

# WILLOWTREE PLANNING



ACN: 146 035 707 ABN: 54 146 035 707  
Level 2, 165 Walker Street  
North Sydney, NSW 2060

enquiries@willowtp.com.au  
willowtreeplanning.com.au  
02 992 9 6974

3 September 2024

REF: WTJ24-213

NSW Department of Planning and Environment  
Housing and Key Sites Assessment  
Locked Bag 5022  
Parramatta NSW 2124

**Attention: Ben Lusher – Executive Director**

**RE: REQUEST FOR INDUSTRY-SPECIFIC SEARS  
PROPOSED SENIORS LIVING DEVELOPMENT  
PROPERTY AT 2-32 JUNCTION STREET FOREST LODGE**

Dear Ben,

We write on behalf of Corio Projects Pty Ltd (the Proponent) to the NSW Department of Planning, Housing, and Industry (DPHI) in support of a request for industry-specific Secretary's Environmental Assessment Requirements (SEARs), under the Rapid Assessment Framework (RAF). The intent of this letter is to demonstrate that the proposal is eligible for industry-specific SEARs.

The proposal involves the construction of Integrated Seniors Living at 2-32 Junction Street Forest Lodge, legally described as the following allotments (subject site).

- Lot A, B & C DP 439209
- Lot 1 DP 1092420
- Lot 1 DP 103720
- Lot 1 DP 613650
- Lot 1 DP 584394
- Lot B DP 87371
- Lot 1 DP 575200

The subject site is located within the City of Sydney Local Government Area (LGA) and is zoned MUI Mixed Use, pursuant to the *Sydney Local Environmental Plan 2012* (SLEP2012). The proposed development falls within the definition of 'seniors housing', which is permissible with consent in the zone and under SLEP2012.

The proposed development seeks consent for an integrated seniors living development, with a total Estimated Development Cost (EDC) of approximately \$80,290,876 million (ex GST).

The proposed development satisfies the definition of State Significant Development (SSD) pursuant to:

ACN: 146 035 707 ABN: 54 146 035 707  
Suite 204, Level 2, 165 Walker Street  
North Sydney, NSW 2060

enquiries@willowtp.com.au  
willowtreeplanning.com.au  
02 9929 6974



SYDNEY | BRISBANE

## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

- Schedule 1, Clause 28 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development for the purpose of seniors housing including a residential care facility with a EDC of more than \$30 million.

This letter provides an overview of the proposed development and the relevant planning framework that applies to enable the issuance of industry-specific SEARs, which will then guide the preparation of a formal Environmental Impact Statement (EIS) for development of the subject site.

The proposal is considered to meet the criteria for industry-specific SEARs, based on the following:

- It does not constitute Designated Development
- It is wholly permissible pursuant to the T&I SEPP
- It does not involve a concept development application (DA)

The following sections provide an overview of proposal to inform the NSW DPHI's decision making for the issuance of industry-specific SEARs.

### 1.0 THE SITE

The Site is identified as 2-32 Junction Street, Forest Lodge, legally described as the allotments listed in **TABLE 1**. The subject site is zoned MUI Mixed Use zone pursuant to SLEP2012.

The site contains a three storey Federation warehouse used for office purposes fronting Junction Street with a contemporary addition to the rear. The remainder of the site is open, covered in asphalt and concrete and used for storage and car parking purposes.

#### 1.1 Site Context

The Site, 2-32 Junction Street, Forest Lodge, is on a quiet street between two main roads; Bridge Street located 60 m to the north, and Parramatta Road located 250 m to the south of the site.

The site is situated in a predominantly residential area with a mix of low to medium-density housing that transitions in height from 5-6 storeys to the west to 1-2 storeys to the east, complemented by commercial and light industrial uses.

- to the north, the site is bounded by a battle axe shaped property on Kimber Lane, a single-level terrace house at 34 Junction Street, a workshop at 1 Kimber Lane, and further north, more single-level terraces and a two-storey office/warehouse on Pyrmont Bridge Road.
- to the east, the site is bounded by Junction Street, lined with approximately twelve 1-2 storey residential terrace houses on the opposite side of the road to the subject site.
- to the south, the site is adjacent to a residential complex at 2A Short Street comprising two-storey terrace houses accessed via Short Street and Sparkes Lane.
- to the west, the site is bordered by Larkin Street Reserve, a seven-storey residential building at 1-3 Larkin Street, a 5-6 storey residential building at 5-13 Larkin Street, and a light industrial building at 12-14 Larkin Street to the southwest.

**TABLE 1. SITE IDENTIFICATION**

Site Address	Legal Description(s)
2 – 10 Junction Street, Forest Lodge	Lot A DP 439209
	Lot B DP 439209
	Lot C DP 439209
	Lot 1 DP 1092420
12 Junction Street, Forest Lodge	Lot 1 DP 1035720
18 – 32 Junction Street, Forest Lodge	Lot 1 DP 613650
	Lot 1 DP 584394



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

TABLE 1. SITE IDENTIFICATION	
Site Address	Legal Description(s)
	Lot B DP 87371
	Lot 1 DP 575200
Site Area	<b>4,824 m<sup>2</sup></b>

The Site and its context are shown in **Figure 1** and **Figure 2**.



**Figure 1. The Site.** Source: SIX Maps, 2024.





## REQUEST FOR INDUSTRY-SPECIFIC SEARS

### Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

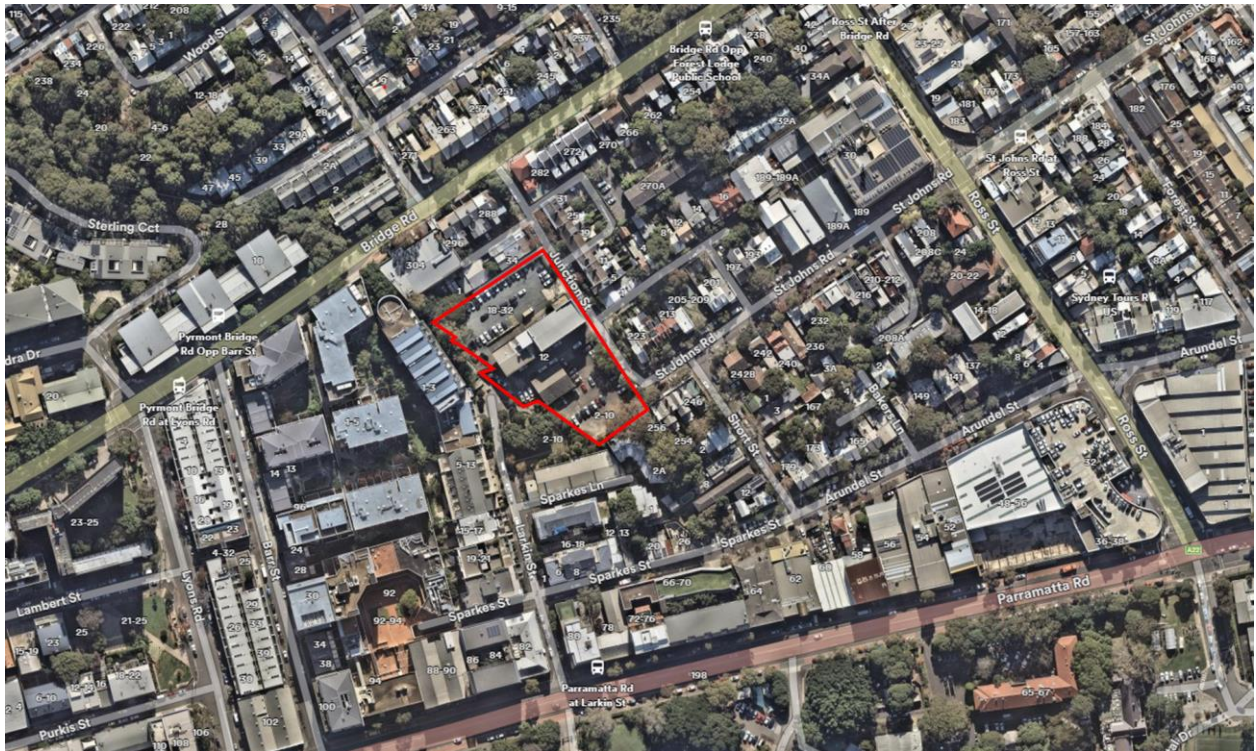


Figure 2. Site Context Map. Source: Nearmaps, 2024.

## 2.0 PROPONENT DETAILS

The Proponent for this proposal is Corio Projects Pty Ltd, refer to **TABLE 2**.

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	Corio Projects Pty Ltd
Contact Name	Jim McBirnie
Position	Development Director
Contact Number	0409 782 764
Email Address	jimm@corioproperties.com.au

## 3.0 ESTIMATED DEVELOPMENT COST

The EDC of the proposed development in accordance with the EDC definition under the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation), is estimated based on the scope of works outlined in **Section 4.0** below.

A preliminary Construction Cost Review has been prepared by FDC, and included in **Appendix 2**, which estimates a total EDC of \$80,290,876 million (ex GST).

## 4.0 PROJECT DETAILS

The proposal will seek development consent for the construction and operation of an Integrated Seniors Living Facility. The current preliminary proposal plan, prepared by WMK Architecture is included within **Appendix 1**.

The particulars of this proposal are summarised below:

## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

Construction of a single building, integrated with and expanding the existing mid-century building located in the centre of the site on Junction Street. The proposed 5-storey building will include:

- 83 (inclusive of 5 accessible) car parking spaces for use by residents and staff, including 63 on the ground floor and 20 on Level 1.
- 71 Independent Living Units, including 42 two-bedroom units and 29 3-bedroom units, split across Levels G - 4.
- A residential care unit with 10 beds, located on Level G.
- Publicly accessible open space located to the rear of the building and expanding on the existing Larkin Street Reserve.
- A paved accessway along the north boundary of the site.
- A dedicated pedestrian laneway along the south boundary of the site.

**TABLE 3 DEVELOPMENT CONTROLS OVERVIEW**

Aspect	Control	Compliance
<b>Zoning and permissibility</b>	MU1 Mixed Use	Yes. Seniors housing is permitted with consent in the zone. It is noted however that permissibility is also achieved under the Housing SEPP and that instrument is to be invoked for the purpose of the SSDA.
<b>FSR</b>	<ul style="list-style-type: none"><li>• 1:1 – Base FSR.</li><li>• 1.56:1 – where public open space and through site links are provided.</li><li>• 1.195:1 – where public open space and through site links are provided, and a FSR bonus under the Housing SEPP is granted.</li></ul>	Yes. The proposal has an FSR 1.95:1. The proposal meets the preconditions for additional FSR under both the site-specific LEP clause and the Housing SEPP.
<b>Height of Buildings</b>	Varying height control 3 m to RL 35.5 – refer to image below (RL 35.5 = approximately 25 m above ground).	The proposal sits fully within the height of building envelope in the SLEP2012. The proposal has a maximum height of RL 32.7.
<b>Heritage</b>	The site is located within the Hereford and Forest Lodge Conservation Area, listed under SLEP 2012.	Yes. The existing building on the site is a contributory item and is being retained. This is consistent with what was envisaged under the
<b>EPBC Act / BC Act</b>	It is anticipated no approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is required/ A waiver to the requirement for the preparation of a Biodiversity Development Assessment Report (BDAR) is requested.	TBC

## 5.0 STATUTORY CONTEXT

This section sets out the statutory planning framework and controls relevant to the proposal.

The following statutes, strategic plans and policies have been considered as part of the development planning phase:

### State Planning:

- *Environmental Planning and Assessment Act 1979*



- *Water Management Act 2000*
- *Biodiversity Conservation Act 2016*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *State Environmental Planning Policy (Housing) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022.*

### Local Planning:

- *Sydney Local Environmental Plan 2012*
- *Sydney Development Control Plan 2015.*

## 5.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing statute for all development in NSW and pursuant to Part 4, the proposal is considered SSD under the Planning Systems SEPP.

### 5.1.1 Section 4.15(1) of the EP&A Act 1979

Section 4.15(1) of the EP&A Act specifies the matters, that a consent authority must consider when determining a DA. The forthcoming EIS will consider and address all matters outlined in Section 4.15 of the EP&A Act.

### 5.1.2 Section 4.46 of the EP&A Act 1979 – Integrated Development

Section 4.46 of the EP&A Act defines ‘Integrated Development’ as matters which require consent from the consent authority and one or more authorities under related legislation. Integrated development does not apply to SSD.

## 5.3 Environmental Planning and Assessment Regulation 2021

### 5.3.1 Section 7 – Designated Development

Section 7(1) of the EP&A Regulation states that:

*“Development described in Schedule 3, Part 2 is declared to be designated development unless it is not designated development under Schedule 3, Part 3.”*

The proposal, being seniors housing, does not trigger Designated Development pursuant to Schedule 3 of the EP&A Regulation.

## 5.4 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seek to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the EP&A Act.



Pursuant to Section 7.2(l) of the BC Act, development or an activity is likely to significantly affect threatened species if:

- (a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) it is carried out in a declared area of outstanding biodiversity value.*

Pursuant to Section 7.9 of the BC Act, an SSD “is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values”.

It is anticipated that the proposed development will not have any significant impact on the environment, and as a result the proponent will seek a waiver to the preparation of a BDAR.

### 5.5 Water Management Act 2000

The objective of the WM Act is the sustainable and integrated management of the state's water for the benefit of both present and future generations.

Section 91 relates to Activity Approvals and outlines that an aquifer interference approval confers a right on its holder to carry out one or more specified aquifer interference activities at a specified location, or in a specified area,

For the purposes of the WM Act, aquifer interference activity means an activity involving:

- a) the penetration of an aquifer,*
- b) the interference with water in an aquifer,*
- c) the obstruction of the flow of water in an aquifer,*
- d) the taking of water from an aquifer in the course of carrying out mining, or any other activity prescribed by the regulations,*
- e) the disposal of water taken from an aquifer as referred to in paragraph (d).*

Should the proposed development involve excavation that is below the existing ground water level, it may require an aquifer interference approval under the WM Act. Consultation with Water NSW and DPHI Water will be undertaken.

### 5.6 State Environmental Planning Policy (Planning Systems) 2021

Schedule 1 of the Planning Systems SEPP includes provisions for developments to be undertaken as SSD. Clause 28, Schedule 1 is relevant to the proposed development:

#### *28 Seniors housing*

*Development for the purposes of seniors housing if—*

- (a) the seniors housing component has an estimated development cost of—*
  - (i) for development on land in the Greater Sydney region—**more than \$30 million**;*
  - or*
  - (ii) otherwise—more than \$20 million, and*
- (b) **the seniors housing component includes a residential care facility**, and*
- (c) other components of the proposed development are not prohibited on the land under an environmental planning instrument.*

### 5.10 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to:





- land use planning within the coastal zone, in a manner consistent with the objects of the *Coastal Management Act 2016*.
- management of hazardous and offensive development.
- remediation of contaminated land and to minimise the risk of harm.

In relation to the subject site, the following matters are highlighted.

### 5.10.1 Remediation of land

Under Chapter 4 of the Resilience and Hazards SEPP, where a DA is made, the consent authority must not grant consent unless:

- (a) it has considered whether the land is contaminated, and*
- (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

A Preliminary Site Investigation will form part of the forthcoming EIS. It is noted that the site assessment will be thoroughly reviewed, and a Remedial Action Plan (RAP) may be required depending on the outcomes of the site assessment outcomes.

### 5.11 Sydney Local Environmental Plan 2012

The subject site is zoned MU1 Mixed Use under the provisions of SLEP2012. Error! Reference source not found. below provides a representation of the subject site and surrounding land zoning under the SLEP2012.

#### 5.11.1 Land use zoning

Under the *Standard Instrument – Principal Local Environmental Plan* the proposal would be considered ‘seniors housing, which is defined as follows:

**seniors housing** means a building or place that is—

- (a) a residential care facility, or*
- (b) a hostel within the meaning of [State Environmental Planning Policy \(Housing\) 2021](#), Chapter 3, Part 5, or*
- (c) a group of independent living units, or*
- (d) a combination of any of the buildings or places referred to in paragraphs (a)–(c), and that is, or is intended to be, used permanently for—*
- (e) seniors or people who have a disability, or*
- (f) people who live in the same household with seniors or people who have a disability, or*
- (g) staff employed to assist in the administration of the building or place or in the provision of services to persons living in the building or place but does not include a hospital.*

#### 5.11.2 Permissibility

Seniors housing is permitted with consent in the zone. It is noted however that permissibility is also achieved under the Housing SEPP and that instrument is to be invoked for the purpose of the SSDA.







**Figure 3. SLEP2012 Zoning Map.** Source: NSW Legislation, 2024.

TABLE 4. LAND USE ZONE	
MU1 Mixed Use	
<b>1 Objectives of zone</b>	<ul style="list-style-type: none"> <li>To encourage a diversity of business, retail, office and light industrial land uses that generate employment opportunities.</li> <li>To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.</li> <li>To minimise conflict between land uses within this zone and land uses within adjoining zones.</li> <li>To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.</li> <li>To ensure land uses support the viability of nearby centres.</li> <li>To integrate suitable business, office, residential, retail and other land uses in accessible locations that maximise public transport patronage and encourage walking and cycling.</li> </ul>
<b>2 Permitted without consent</b>	Home occupations
<b>3 Permitted with consent</b>	Amusement centres; Boarding houses; Car parks; Centre-based child care facilities; Commercial premises; Community facilities; Entertainment facilities; Function centres; Information and education facilities; Light industries; Local distribution premises; Medical centres; Oyster aquaculture; Passenger transport facilities; Places of public worship; Recreation areas; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Shop top housing; Tank-based aquaculture; Tourist and visitor accommodation; Vehicle repair stations; <b>Any other development not specified in item 2 or 4</b>
<b>4 Prohibited</b>	Extractive industries; Heavy industrial storage establishments; Heavy industries; Pond-based aquaculture



**5.11.3 Design Excellence**

Under SLEP2012, the following would trigger the requirement for a competitive design process:

- the Estimated Development Cost of the proposed development is more than \$100 Million; or
- the height above ground level is 25 metres or more, or
- Clause 7.20 applies to the site.

It is noted that for the proposed development:

- the Estimated Development Cost is less than \$100 Million;
- The proposal has a maximum building height of RL 32.7, which is equivalent to less than 25m above ground level; and
- The site is less than 5,000m<sup>2</sup>, and hence Clause 7.20 does not apply.

In summary, given none of the above thresholds are met, a design competition is not required.

**5.11.4 Site-specific LEP Clause**

SLEP2021 Chapter 6 includes *Clause 6.40 2-32 Junction Street, Forest Lodge*, a site-specific clause applying to the subject site.

Clause 6.40 permits additional FSR on the site, where development on the subject land provides for publicly accessible open space and other links through the site.

The proposed development includes public open space and through site links, consistent within the site layout plan in the site-specific DCP clause (Refer **Section 5.12** below). It is understood that the proposal would be eligible for an FSR of up to 1.56:1 on this basis.

The site-specific clause is as follows:

*6.40 2-32 Junction Street, Forest Lodge*

- (1) *This clause applies to the following land at Forest Lodge (the subject land)–*
  - (a) *2-10 Junction Street, being Lots A-C, DP 439209 and Lot 1, DP 1092420,*
  - (b) *12-16 Junction Street, being Lot 1, DP 1035720,*
  - (c) *18-32 Junction Street, being Lot 1, DP 613650, Lot 1, DP 584394, Lot B, DP 87371 and Lot 1, DP 575200.*
- (2) *Despite clause 4.4, the consent authority may grant development consent to the erection of a building on the subject land that exceeds the maximum floor space ratio shown for the subject land on the [Floor Space Ratio Map](#) if–*
  - (a) *the floor space ratio for all buildings on the subject land will not exceed 1.56:1, and*
  - (b) *development on the subject land provides for publicly accessible open space and other links through the site, and*
  - (c) *in the case of development that is BASIX affected development–the development–*
    - (i) *exceeds the BASIX commitment for water for the development by not less than 25% of the water target score, and*
    - (ii) *exceeds the BASIX commitment for energy for the development by not less than 25% of the energy target score.*
- (3) *The reference to the floor space ratio shown for the land on the Floor Space Ratio Map in clause 6.21D(3)(b)(i) is taken, in its application to a building on the subject land, to be a reference to the maximum floor space ratio referred to in this clause.*

**5.12 Sydney Development Controls Plan 2012**

The Sydney Development Control Plan 2012 (SDCP2012) applies to the site, however it is understood that given the proposal would be State Significant Development, strict compliance with the DCP is not required. Notwithstanding it is noted that the SDCP contains Chapter 6.3.12 which relates specifically to the site.



The chapter includes design guidance relating to required open space and through site links, maximum building envelopes, solar access, flood risk management, heritage conservation and the arrangement for entries to ground floor dwellings fronting Junction Street. The proposed development is consistent with the design guidance provided in this chapter.

### 3.1.1 Planning Proposal

A Planning Proposal (PP) (Reference: PP-2020-450) was prepared for the site which increased the permissible height of buildings from 12 metres to varying heights RL 17 to RL 35.5, equivalent to 19 to 25 metres above ground level. Increases to FSR was also granted, subject to the future development of the site providing a through site link and publicly accessible open space. The accompanying amendment to SLEP2012 was gazetted on 18 January 2019. In response to the PP, the Sydney Development Control Plan (SDCP2012) was subsequently updated by Council to include a site-specific clause.

The following planning matters were raised during the PP process and were reflected in the site-specific LEP controls and DCP provisions:

- **Open space and through-site link** – The creation of publicly accessible open space and a through-site link are noted as key requirements. The development must expand and integrate Larkin Street Reserve to provide enhanced green space for the community. The planning proposal notes there is a shortfall of high-quality open space and that open space will help to accommodate the increased demand resulting from the new development. Additionally, a new through-site link is required to improve pedestrian connectivity and access between Junction Street and Larkin Street.
- **Heritage conservation** – The approved planning proposal cites the importance of retaining the existing three-storey Federation warehouse building. Council noted during the PP process that the potential restoration of the warehouse's façade would enhance its aesthetic appeal. The SDCP2012 was modified to note the building as a contributory item in the Heritage Conservation Area, where previously it was noted as a detractor.
- **Amenity impacts to neighbouring open space and properties** – There is an acknowledged need to ensure the ongoing amenity of adjoining neighbours and open space areas, in relation to wind and overshadowing. There are detailed controls in the Sydney DCP in relation to this.
- **Flooding** – Flood mitigation is required due to the site's location in a major trapped low point subject to significant flooding. Key concerns raised in the PP included potential inundation from multiple flow paths, with peak flood levels reaching up to 3.5 metres. To mitigate these risks.

The proposal addresses the matters raised through the PP process and is consistent with the relevant provisions in the SLEP2012 and the SDCP2012.



## 6.0 INDUSTRY-SPECIFIC SEARS

This section reviews the relevant industry-specific SEARs and includes commentary on how the Applicant intends to respond to each item, where applicable. Refer to **TABLE 5** for further details.

<b>TABLE 5: INDUSTRY-SPECIFIC SEARS</b>		
<b>Issue and Assessment Requirements</b>	<b>Documentation</b>	<b>Applicant Comments</b>
<b>1. Statutory Context</b> <ul style="list-style-type: none"> <li>Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.</li> <li>Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.</li> <li>Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences.</li> <li>Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination</li> </ul>	Address in EIS.	Noted – the proposal will address the requirement of this item.
<b>2. Estimated Development Cost and Employment</b> <ul style="list-style-type: none"> <li>Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report.</li> <li>The EDC Report must specify the EDC of the seniors housing component of the development.</li> <li>Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.</li> </ul>	Estimated Development Cost Report.	Noted – a EDC Report will support the proposal.
<b>3. Design Quality</b> <ul style="list-style-type: none"> <li>Demonstrate how the development will achieve: <ul style="list-style-type: none"> <li>design excellence in accordance with any applicable EPI provisions.</li> <li>good design in accordance with the seven objectives for good design in <i>Better Placed</i>.</li> </ul> </li> </ul> <p>Demonstrate that the development:</p> <ul style="list-style-type: none"> <li>Where required by an EPI or concept approval, demonstrate how the</li> </ul>	Address in EIS. If required: <ul style="list-style-type: none"> <li>Design Review Summary (where the project has been reviewed by the SDRP).</li> <li>Design Excellence Strategy (where design excellence is required by an EPI).</li> <li>Competition Report (where a competitive</li> </ul>	Design quality will be addressed in the EIS.  The proposal does not meet the relevant thresholds for design excellence or review by the SDRP.





## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
<p>development has been subject to a competitive design process, carried out in accordance with an endorsed brief and Design Excellence Strategy; or</p> <ul style="list-style-type: none"> <li>○ In all other instances, demonstrate that the development has been reviewed by the State Design Review Panel (SDRP) where required under the NSW SDRP: Guidelines for Project Teams.</li> </ul> <ul style="list-style-type: none"> <li>▪ Recommendations of the jury and Design Integrity Panel (where a competitive design process has been held) or the SDRP are to be addressed prior to lodgement.</li> </ul>	<p>design process has been held).</p>	
<p><b>4. Built Form and Urban Design</b></p> <ul style="list-style-type: none"> <li>▪ Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach.</li> <li>▪ Demonstrate how the development considers the design principles in Part 5, Division 6 of <i>State Environmental Planning Policy (Housing) 2021</i> and the <i>Seniors Housing Guidelines 2021</i>.</li> <li>▪ Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality.</li> <li>▪ Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services.</li> <li>▪ Assess how the development complies with the relevant accessibility requirements.</li> </ul>	<p>Architectural drawings. Design Report. Survey Plan. BCA Compliance Report. Accessibility Report.</p>	<p>Noted – the proposal will address the requirements of this item through the listed reports.</p>
<p><b>5. Environmental Amenity</b></p> <ul style="list-style-type: none"> <li>▪ Address how good internal and external environmental amenity is achieved, including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces.</li> <li>▪ Assess amenity impacts on the surrounding locality, including lighting impacts, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential</li> </ul>	<p>Shadow Diagrams. View Analysis. Pedestrian Wind Environment Assessment.</p>	<p>Noted – the proposal will address the requirements of this item through the listed reports.</p>



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
<p>or other sensitive land uses must be demonstrated.</p> <ul style="list-style-type: none"> <li>Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development (if relevant).</li> <li>For any applicable parts of the development, provide an assessment against SEPP 65 and the Apartment Design Guideline</li> </ul>		
<p><b>6. Visual Impact</b></p> <ul style="list-style-type: none"> <li>Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.</li> <li>Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.</li> </ul>	<ul style="list-style-type: none"> <li>Visual Analysis.</li> <li>Visual Impact Assessment.</li> </ul>	<p>Noted – the proposal will be informed by photomontages and perspective drawings, where necessary, and include a Visual Impact Assessment.</p>
<p><b>7. Public Space</b></p> <ul style="list-style-type: none"> <li>Demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department.</li> <li>Demonstrate how the development: <ul style="list-style-type: none"> <li>ensures that public space is welcoming, attractive and accessible for all. <ul style="list-style-type: none"> <li>maximises permeability and connectivity.</li> <li>maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection.</li> <li>minimises potential vehicle, bicycle and pedestrian conflicts.</li> </ul> </li> </ul> </li> <li>Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>Public Space Plan (as part of the Design Report).</li> <li>CPTED Report.</li> </ul>	<p>Noted – the proposal will address the requirements of this item through the listed reports.</p>
<p><b>8. Trees and Landscaping</b></p> <ul style="list-style-type: none"> <li>Assess the number, location, condition and significance of trees to be removed</li> </ul>	<ul style="list-style-type: none"> <li>Arboricultural Impact Assessment.</li> <li>Landscape Plan.</li> </ul>	<p>Noted – the proposal will address the requirements of this item</p>



**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
<p>and retained and note any existing canopy coverage to be retained on-site.</p> <ul style="list-style-type: none"> <li>▪ Provide a detailed site-wide landscape plan, that: <ul style="list-style-type: none"> <li>○ details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage.</li> <li>○ provides evidence that opportunities to retain significant trees have been explored and/or informs the plan.</li> <li>○ demonstrates how the proposed development would: <ul style="list-style-type: none"> <li>▪ contribute to long term landscape setting in respect of the site and streetscape.</li> <li>▪ mitigate the urban heat island effect and ensure appropriate comfort levels on-site.</li> <li>▪ contribute to the objective of increased urban tree canopy cover.</li> <li>▪ maximise opportunities for green infrastructure, consistent with Greener Places and having regard to any bushfire risk.</li> </ul> </li> </ul> </li> </ul>		<p>through the listed reports.</p>
<p><b>9. Ecologically Sustainable Development (ESD)</b></p> <ul style="list-style-type: none"> <li>▪ Identify how ESD principles (as defined in section 193 of the EP&amp;A Regulation) are incorporated in the design and ongoing operation of the development.</li> <li>▪ Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards.</li> <li>▪ Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.</li> </ul>	<ul style="list-style-type: none"> <li>▪ ESD Report.</li> <li>▪ BASIX Certificate</li> </ul>	<p>Noted – the proposal will provide an ESD report.</p>
<p><b>10. Traffic, Transport and Accessibility</b></p> <ul style="list-style-type: none"> <li>▪ Provide a transport and accessibility impact assessment, which includes: <ul style="list-style-type: none"> <li>○ an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure,</li> <li>○ current daily and peak hour vehicle movements, and existing performance levels of nearby intersections.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Transport and Accessibility Impact Assessment.</li> <li>▪ Construction Traffic Management Plan.</li> <li>▪ Green Travel Plan or equivalent.</li> </ul>	<p>Noted – the proposal will address the requirements of this item through the listed reports.</p>



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

TABLE 5: INDUSTRY-SPECIFIC SEARS		
Issue and Assessment Requirements	Documentation	Applicant Comments
<ul style="list-style-type: none"><li>○ details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances, and an explanation of how residents will access facilities and services), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading.</li><li>○ analysis of the impacts of the proposed development during construction and operation (including justification for the methodology used), including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict) and any cumulative impact from surrounding approved developments.</li><li>○ measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms of delivery (including proposed arrangements with local councils or government agencies) of any infrastructure improvements in accordance with relevant standards.</li><li>○ proposals to promote sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle</li></ul>		





## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
<p>parking and high-quality end-of-trip facilities, and implementing a Green Travel Plan.</p> <ul style="list-style-type: none"> <li>Provide a Construction Traffic Management Plan detailing construction vehicle movements, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.</li> </ul>		
<p><b>11. Biodiversity</b></p> <ul style="list-style-type: none"> <li>Assess any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the development is on biodiversity certified land.</li> <li>If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.</li> </ul>	<p>Biodiversity Development Assessment Report or BDAR Waiver.</p>	<p>Noted – the proposal will include a BDAR or waiver.</p>
<p><b>12. Noise and Vibration</b></p> <ul style="list-style-type: none"> <li>Provide a noise and vibration assessment prepared in accordance with the relevant NSW Environment Protect Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.</li> </ul>	<p>Noise and Vibration Impact Assessment.</p>	<p>Noted – the proposal will be supported by a Noise and Vibration Impact Assessment.</p>
<p><b>13. Ground and Water Conditions</b></p> <ul style="list-style-type: none"> <li>Provide an assessment of the potential impacts on soil resources, including related infrastructure and riparian lands on and near the site.</li> <li>Provide an assessment of the potential impacts on surface and groundwater resources (quality and quantity), including related infrastructure, hydrology, aquatic and groundwater dependent ecosystems, drainage lines, downstream assets and watercourses.</li> <li>Provide an assessment of salinity and acid sulfate soil impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Geotechnical Assessment.</li> <li>Surface and Groundwater Impact Assessment.</li> <li>Salinity Management Plan and/or Acid Sulfate Soils Management Plan.</li> </ul>	<p>Noted – the proposal will address the requirements of this item through the listed reports.</p>



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
<p><b>14. Water Management</b></p> <ul style="list-style-type: none"> <li>Provide an Integrated Water Management Plan for the development that: <ul style="list-style-type: none"> <li>is prepared in consultation with the local council and any other relevant drainage or water authority.</li> <li>outlines the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase in servicing demand) and evaluates opportunities to reduce water demand (such as recycled water provision).</li> <li>details the proposed drainage design for the site including any on-site treatment, reuse and detention facilities, water quality management measures, and the nominated discharge points.</li> <li>demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse impacts on any downstream properties.</li> </ul> </li> <li>Where water and drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.</li> </ul>	Water Management Plan.	Noted – the proposal will be supported by an Integrated Water Management Plan.
<p><b>15. Flood Risk</b></p> <ul style="list-style-type: none"> <li>Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the <i>NSW Floodplain Development Manual</i>.</li> <li>Where the development could alter flood behaviour, affect flood risk to the existing community or expose its users to flood risk, provide a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01.</li> <li>Detail design solutions and operational procedures to mitigate flood risk where required.</li> </ul>	Flood Risk Assessment.	Noted – the proposal will be supported by a Flood Risk Assessment.



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
<b>16. Hazards and Risk</b> <ul style="list-style-type: none"> <li>Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021.</li> <li>Where required by SEPP (Resilience and Hazards) 2021., provide a Preliminary Hazard Analysis prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis</i>.</li> <li>If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.</li> </ul>	Preliminary Hazard Analysis.  If required: Hazard Analysis	Noted – the proposal will be supported by a preliminary risk screening assessment, and if required a Preliminary Hazard Analysis.
<b>17. Contamination and Remediation</b> <ul style="list-style-type: none"> <li>In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.</li> </ul>	Preliminary Site Investigation. If required: <ul style="list-style-type: none"> <li>Detailed Site Investigation.</li> <li>Remedial Action Plan.</li> <li>Preliminary Long-term Environmental Management Plan.</li> </ul>	Noted – the proposal will be supported by a Preliminary Site Investigation (as a minimum).
<b>18. Waste Management</b> <ul style="list-style-type: none"> <li>Identify, quantify and classify the likely waste streams to be generated during construction and operation.</li> <li>Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.</li> <li>Identify appropriate servicing arrangements for the site.</li> <li>If buildings are proposed to be demolished or altered, provide a hazardous materials survey.</li> </ul>	<ul style="list-style-type: none"> <li>Waste Management Plan.</li> <li>Hazardous Material Survey.</li> </ul>	Noted – the proposal will be supported by a Waste Management Plan and Hazardous Material Survey.
<b>19. Aboriginal Cultural Heritage</b> <ul style="list-style-type: none"> <li>Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site.</li> </ul>	Aboriginal Cultural Heritage Assessment Report.	Noted – the proposal will be supported by an Aboriginal Cultural Heritage Assessment Report.
<b>20. Environmental Heritage</b> <ul style="list-style-type: none"> <li>Where there is potential for direct or indirect impacts on the heritage significance of items of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance</li> </ul>	<ul style="list-style-type: none"> <li>Statement of Heritage Impact.</li> <li>Archaeological Assessment.</li> </ul>	N/A. There are no heritage items on or in close proximity to the subject site. As such a Heritage Impact Assessment is not required.



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

TABLE 5: INDUSTRY-SPECIFIC SEARS		
Issue and Assessment Requirements	Documentation	Applicant Comments
with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.		
<b>21. Social Impact</b> <ul style="list-style-type: none"> <li>Provide a Social Impact Assessment prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>.</li> </ul>	Social Impact Assessment.	Noted – the proposal will be supported by a Social Impact Assessment prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Developments</i> .
<b>22. Infrastructure Requirements and Utilities</b> <ul style="list-style-type: none"> <li>In consultation with relevant service providers: <ul style="list-style-type: none"> <li>assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site.</li> <li>identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained.</li> <li>provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.</li> </ul> </li> </ul>	Infrastructure Delivery, Management and Staging Plan.	Noted – the proposal will be supported by an Infrastructure Delivery, Management and Staging Plan.
<b>23. Bush Fire Risk</b> <ul style="list-style-type: none"> <li>If the development is on bush fire prone land, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.</li> </ul>	Bush Fire Assessment.	The proposal is not located on bushfire prone land, however as a Special Fire Protection Purpose, the proponent will address the relevant provisions of the RF Regulation.
<b>24. Aviation</b> <ul style="list-style-type: none"> <li>If the development proposes a helicopter landing site (HLS), assess its potential impacts on the flight paths of any nearby airport, airfield or HLS.</li> <li>If the site contains or is adjacent to a HLS, assess the impacts of the development on that HLS.</li> </ul>	Aviation Report	N/A. The proposal does not propose an HLS nor are there any HLS adjacent to the site.
<b>25. Construction, Operation and Staging</b> <ul style="list-style-type: none"> <li>If staging is proposed, provide details of how construction and operation</li> </ul>	Address in EIS.	Noted – the proposal will address the requirement of this item.





## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

**TABLE 5: INDUSTRY-SPECIFIC SEARS**

Issue and Assessment Requirements	Documentation	Applicant Comments
would be managed, and any impacts mitigated.		
<b>26. Contributions and Public Benefit</b> <ul style="list-style-type: none"> <li>Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit.</li> <li>Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.</li> </ul>	Address in EIS.	Noted – the proposal will address the requirement of this item.
<b>27. Engagement</b> <ul style="list-style-type: none"> <li>Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: <ul style="list-style-type: none"> <li>the relevant Department assessment team.</li> <li>any relevant local councils.</li> <li>any relevant agencies.</li> <li>the community.</li> <li>if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&amp;A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&amp;A Act, the agency relevant to that approval or authorisation.</li> </ul> </li> </ul>	Engagement report.	Noted – the proposal will be supported by an Engagement Report, in accordance with the <i>Undertaking Engagement Guidelines for State Significant Projects</i> .



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Integrated Seniors Living Development, 2-32 Junction Street Forest Lodge

---

The proposal is considered to meet the eligibility criteria for industry-specific SEARs. As such, it is requested that NSW DPHI issue formal SEARs for the preparation of an EIS for this proposal as SSD.

Should you require any further information to do so, please do not hesitate to contact the undersigned on 0413 555 638 or via email at [acowan@willowtp.com.au](mailto:acowan@willowtp.com.au)

Your sincerely,



Andrew Cowan  
Director  
Willowtree Planning

Willowtree Planning Pty Ltd

enclosed –

<b>Appendix 1</b>	Preliminary Architectural Plans
<b>Appendix 2</b>	Preliminary Construction Cost Estimate

