



planning consultants

Statement of Environmental Effects

Senior Housing and Affordable Housing Development
Masterplan and Stage I Works
49 Lodges Road, Narellan



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Contents

Executive Summary	v
1 Introduction	1
1.1 Commission	1
1.2 Purpose of this Statement	1
1.3 Project Team	1
1.4 Material Relied Upon	2
2 Background	3
2.1 Registered Community Housing Provider	3
2.2 Previous Development Consents	3
2.3 Pre-DA Meeting	3
3 Site Context	4
3.1 Location	4
3.2 Site Description	5
3.3 Surrounding Development	7
3.4 Site Analysis	7
4 Proposed Development	9
4.1 Masterplan	9
4.2 Stage 1 Development	9
4.2.1 Seniors and Affordable Housing	9
4.2.2 Community Centre	10
4.2.3 Landscaping	11
4.2.4 Internal Road Network	11
4.2.5 Car Parking	11
4.2.6 Stormwater Infrastructure	11
4.2.7 Subdivision	12
4.3 Proposed Future Development	12
4.3.1 Residential Aged Care Facility	12
4.3.2 Retirement Village Villas	12
4.4 Demolition and Site Preparation	12
5 Approvals, Permits and Licences	13
5.1 Mining Subsidence	13
5.2 Water Management Act 2000	14
6 Environmental Planning Assessment	15
6.1 Planning Controls	15
6.1.1 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	15
6.1.2 State Environmental Planning Policy (Affordable Rental Housing) 2009	20
6.1.3 State Environmental Planning Policy No. 55 – Remediation of Land	21

Contents

6.1.4	State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	21
6.1.5	Camden Local Environmental Plan 2010	21
6.1.6	Camden Development Control Plan 2011	24
6.2	Likely Impacts of the Development	29
6.2.1	Site Preparation Works	29
6.2.2	Urban Design Considerations	30
6.2.3	Water Quantity and Quality	30
6.2.4	Civil Engineering	32
6.2.5	Solar Access	32
6.2.6	Traffic and Parking	33
6.2.7	Waste Management	33
6.2.8	Servicing	34
6.2.9	Crime and Safety	34
6.2.10	Acoustic Considerations	35
6.2.11	Construction Management	35
6.2.12	Social Impact/Demand Assessment	36
6.2.13	Economic Impact	41
6.3	Section 94 considerations and SIC	42
6.3.1	Section 94/94A Contributions	42
6.3.2	Special Infrastructure Contribution (SIC)	42
6.4	Suitability of the Site for Development	43
6.5	Public Interest	43
7	Conclusion	44

Figures

Figure 1	Site Location	4
Figure 2	Aerial Photograph	4
Figure 3	View across site, looking north west	6
Figure 4	View of existing dam	7
Figure 5	Extract from Site Analysis Plan	8
Figure 6	South Campbelltown Mining Subsidence District Map	13
Figure 7	Zoning Map Extract.	22
Figure 8	Height of Buildings Map Extract.	23
Figure 9	Extract from Camden DCP 2011 Elderslie master plan (Figure C12)	26
Figure 10	Development option based on collaborative subdivision – Option 1	27
Figure 11	Development option based on Lot 300 being developed in isolation – Option 2	28
Figure 12	Typical Elevation of a 3 tier retaining wall	30
Figure 13	Extract from draft South West District Plan – The Housing Continuum	39
Figure 14	Extract from BOSCAR crime mapping statistics website	40
Figure 15	Extract from Camden Contributions Plan 2011 (Figure 2.2 Elderslie and Spring Farm Contributions Precinct	42

Contents

Tables

Table 1	The Project Team	1
Table 2	Assessment against Relevant Provisions of SEPP Seniors	15
Table 3	Assessment against Relevant Provisions of Camden LEP 2010	22
Table 4	Assessment against Relevant Provisions of DCP	24
Table 5	Location of Services and Facilities	37

Appendices

1.	Site Survey
2.	Pre lodgement meeting minutes
3.	Architectural Plans
4.	Urban Design Assessment
5.	Landscape Plans
6.	Civil Engineering Report and Plans
7.	Community Title Plan of Subdivision
8.	MSB Preliminary Advice
9.	Geotechnical Assessment
10.	Accessibility Assessment
11.	BASIX Certificates
12.	Letter of advice from Sydney Water
13.	Electrical servicing advice
14.	Waste Management Plan
15.	Noise Impact Assessment
16.	Traffic and Parking Assessment
17.	Construction Management Plan
18.	BaptistCare Certificate of Registration

Executive Summary

DFP has been commissioned by LendLease on behalf of BaptistCare to prepare a Statement of Environmental Effects to lodge with a development application (DA) for proposed seniors living dwellings and affordable housing for families at 49 Lodges Road, Narellan (the site).

BaptistCare NSW & ACT is a Class 2 Community Housing Provider, registered under the National Regulatory System for Community Housing.

BaptistCare has advised that a development mix including self-contained seniors housing units together with some housing suitable to accommodate single parent families is the desired outcome for this site.

The development has been designed having regard to the characteristics of the site including:

- Prevailing topography
- Character of nearby and adjoining development
- Location of significant vegetation and landscape features
- Existing development on the site
- Site constraints

This SEE is to accompany a DA submission to Camden Council for a staged DA and concurrent Stage 1 DA. The Stage 1 work will comprise:

- 84 x 1 bedroom seniors villas; and
- 38 x 2 bedroom affordable housing town houses to be provided as group homes;
- A community room;
- Site infrastructure, including roads and drainage; and
- Community title subdivision.

Other development included in the master plan for the site includes a residential aged care facility and 46 retirement village villas. These facilities will be subject to separate development applications.

The DA has been prepared having regard to the following environmental planning instruments (EPIs):

- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (SEPP Seniors) for the seniors dwellings; and
- State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP) for the affordable housing dwellings for families.

Regard has also been had to Camden Local Environmental Plan (LEP) 2010 and Camden Development Control Plan (DCP) 2011.

It is considered that the proposed development is well designed and will make a positive contribution to the Elderslie release area and will complement the existing development on the site and in the locality.

The siting and location of the buildings has had regard to the prevailing topography of the site and the accessibility requirements of future residents. Ample landscaping opportunities, including large communal open space areas which are easily accessible by all future residents have been provided.

The proposed development will contribute positively to the Narellan community and will present an appropriate urban form in the area. Accordingly, the proposal is considered to satisfactorily respond to the opportunities and constraints of the site and is consistent with the character of the area.

A Stormwater Management Strategy has been prepared for the site and includes rainwater tanks and on-site detention to ensure the development meets the objectives of the Camden DCP.

The proposed development will not result in unreasonable impacts on adjoining properties, both future and existing, and will not have any negative environmental impacts. The site is serviced by essential infrastructure and services, which will be augmented to service the development.

There are no Section 94 contribution plans applicable to this site or the proposed development.

1 Introduction

1.1 Commission

DFP has been commissioned by Lend Lease on behalf of BaptistCare to prepare a Statement of Environmental Effects (SEE) for the proposed Masterplan and Stage 1 Works for an Affordable Housing development at 49 Lodges Road, Narellan (the site).

This report is to accompany a staged development application (DA) to Camden Council (Council) for a Masterplan and concurrent Stage 1 development comprising the construction of an Affordable Housing development. The Stage 1 work will comprise:

- 84 x 1 bedroom seniors villas;
- 38 x 2 bedroom affordable housing town houses to be provided as group homes;
- A community room;
- Site infrastructure, including roads and drainage; and
- Community title subdivision.

Other development included in the master plan for the site includes a 134 bed residential aged care facility and 46 retirement village villas. These facilities will be subject to separate development applications.

The site is zoned R1 General Residential (the R1 Zone) under Camden Local Environmental Plan (LEP) 2010, and development for seniors housing and group homes is permitted with consent under the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 Seniors SEPP) and State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP) respectively.

1.2 Purpose of this Statement

The purpose of this report is to provide Council and relevant NSW State Government Agencies with all relevant information necessary to assess the subject development proposal and to determine the DA in accordance with Section 80 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2000* (the Regulation).

The proposed development is also Integrated Development pursuant to Part 4 Division 5 of the EP&A Act as it involves development on land within an area identified as being Mine Subsidence Area and works on land within 40m of a water course.

1.3 Project Team

The preparation of the DA has been a collaborative effort by a team of consultants as specified in **Table 1**.

Table 1 The Project Team

Project Management	Lend Lease
Town Planning	DFP Planning Pty Limited
Architectural	DWP Suters
Landscape	Scape Design Pty Ltd
Civil Engineering and Stormwater Design	SCP Consulting Pty Ltd
Traffic	Seca Solution
Acoustic	Acoustic Logic
Electrical Servicing	Webb Australia

1 Introduction

Table 1 The Project Team

Survey and Subdivision	Linker Surveying
Salinity	Douglas Partners
BASIX	Efficient Living
Geotechnical	Douglas Partners and Geo Enviro
Accessibility	Morris Godding Accessibility Consulting (NSW)
Waste Management	Waste Audit and Consultancy Services
Urban Design	DFP Planning Pty Ltd

1.4 Material Relied Upon

This SEE has been prepared by DFP based on information referred to herein and/or appended to this report and site inspections of the property.

2 Background

2.1 Registered Community Housing Provider

BaptistCare NSW & ACT is a Class 2 Community Housing Provider, registered under the National Regulatory System for Community Housing.

BaptistCare has determined that a development mix including self-contained seniors housing units together with some housing suitable to accommodate families is the preferred outcome for this site. The existing seniors housing development on the site would be maintained.

A copy of BaptistCare's certificate of registration as a community housing provider is included at **Appendix 18** to this SEE.

2.2 Previous Development Consents

In September 2011, the JRPP approved DA393/2011 under 2010SYW028 which sought consent for the following development on that part of the site proposed to be occupied by the new development:

Alterations and additions to the existing aged care facility to consist of a four stage development. Works to include demolition and redevelopment of limited existing villas, construction of 27 self-care villas, 6 serviced self-care accessible apartments and a partial three storey building to consist of a 64 place Residential Aged Care Facility. Associated works to include earthworks, tree removal, drainage, parking and landscaping.

The development did not proceed and the consent has now subsequently lapsed, however approval of this DA demonstrates that the site has the environmental capacity to accommodate additional development.

2.3 Pre-DA Meeting

On 27 September 2016, a pre-development application meeting (meeting 117/2016) was held with Camden Council to discuss the Stage 1 plans for the seniors housing and affordable housing facility and the scope of the Masterplan. A copy of the meeting minutes is included at **Appendix 2**.

The primary points of discussion arising from the Pre-DA meeting were:

- The proposed Masterplan will be a staged development application under the provisions of Clause 83B of the EP&A Act;
- Permissibility and relevant EPIs for the proposed development;
- Variation to the Indicative Layout Plan for the area;
- Traffic and engineering issues; and
- Advice regarding Development Contributions and potential exemptions.

The comments provided by Council at that meeting and in the minutes have been taken into account in the preparation of the DA documentation and the design of the development. These matters are addressed in further detail in the body of this SEE.

3 Site Context

3.1 Location

The site is known as 49 Lodges Road, Narellan and is located on the southern side of Lodges Road approximately 1.5km from the Narellan town centre and shopping centre. **Figure 1** shows the site's location and surrounds.

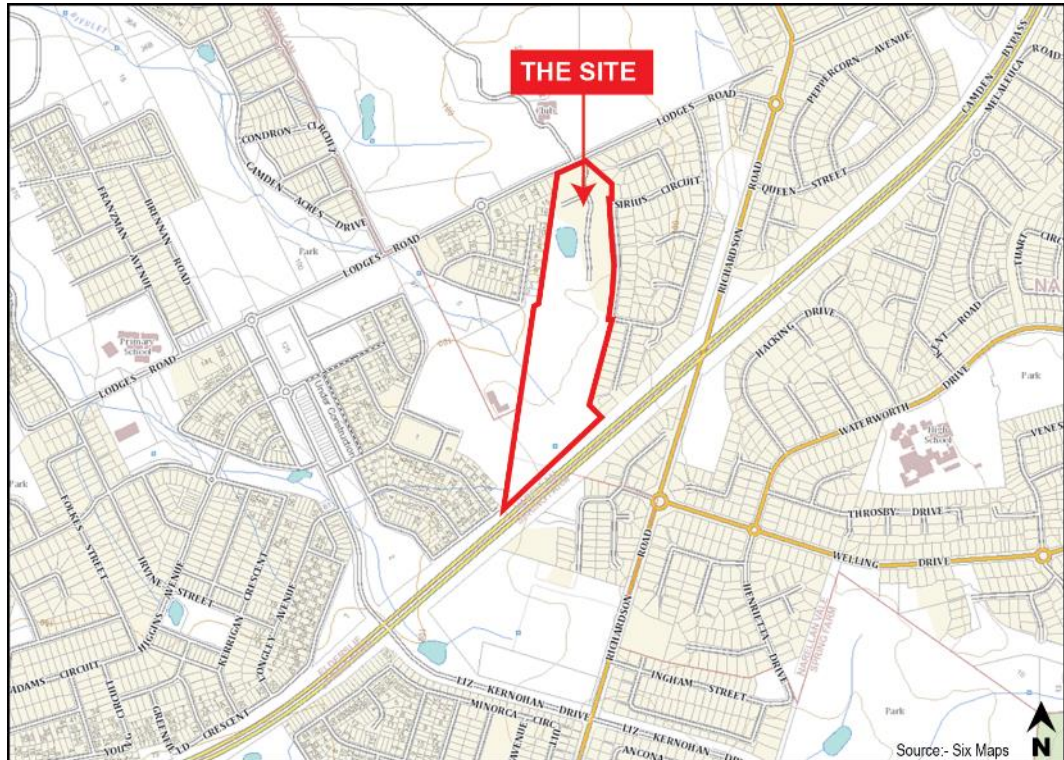


Figure 1 Site Location



Figure 2 Aerial Photograph

3 Site Context

3.2 Site Description

The site comprises two allotments and is legally described as Lot 200 in DP 1022680 and Lot 13 DP 242250. The site is bound by Lodges Road to the north, Sirius Circuit (and residential properties with frontage to Sirius Circuit) to the east and the Camden Bypass to the south. The Elderslie release area and associated residential subdivision (under construction) adjoins the site to the west. **Figure 2** is an aerial image of the site and its immediate surrounds.

BaptistCare has been in discussions with the adjoining land owner, AV Jennings with respect to a land swap to rationalise the boundaries between the two land holdings. In this regard, a DA to facilitate that land swap has been prepared and will shortly be lodged with Council.

The subdivision provides for a realignment of boundaries between the BaptistCare land and proposed Lot 500 in DA970/2015. Upon completion of the boundary realignment, the BaptistCare site will be known as Lot 100 and will have a total area of 9.548ha. **Figure 3** is an extract from the subdivision plan that will be submitted with the boundary adjustment DA.



Figure 3 Extract from plan of subdivision prepared by Proust and Gardener to accompany boundary adjustment application.

For the purposes of this assessment, any reference to the site will be a reference to Lot 100.

The site (i.e. – Lot 100) has a total area of 9.548ha and the major western boundary of the site is over 500m in length. The site frontage to Lodges Road is 64.6m and the southern boundary which abuts the Camden bypass is almost 140m in length.

An existing seniors housing development known as Angus Bristow Village is currently located on the northern part of the site. The remainder of the site is undeveloped.

Existing development on the site comprises 48 self-contained dwellings. The breakup of these 48 dwellings is as follows:

- 2 x 1 bedroom units
- 32 x 2 bedroom units
- 14 x 3 bedroom units

It is proposed to retain existing accommodation on the site as part of any future development scheme. In addition to the residential accommodation, there is also a community centre (in which the village administration offices are located) and a club room located on the site.

3 Site Context

Access to the site is currently provided from Lodges Road. As part of a previous development approval (which was never acted upon and has now lapsed) access through the new residential area to the west via Vicary Avenue was approved (See **Section 2.1**). Although the site has frontage to Sirius Circuit, no formal vehicular access to this road is currently provided. Camden Bypass is a classified road and therefore direct vehicular access to this road from the site would not be permitted. In any event, the road carriageway of the Camden Bypass in the vicinity of the site is approximately 5m below the level of the site at its southern end.

As shown in **Figure 3**, the vacant part of the site is mainly vegetated with grasses. There are three stands of trees on the site – one adjacent to the existing dam towards the northern part of the site, a second stand located adjacent to the eastern boundary in the southern part of the site and the third stand is located in the extreme south western corner of the site, adjacent to Camden Bypass. This stand of trees is located on land which will be transferred to AV Jennings as part of the land swap/boundary adjustment.

The topography of the site is such that there are district views from the site to the west. There is a low point which runs east-west roughly through the centre of the site. The existing dam functions as a temporary water storage basin and has a surface area of approximately 1,200m² (See **Figure 4**).



Figure 3 View across site, looking north west

3 Site Context



Figure 4 View of existing dam

3.3 Surrounding Development

The subject site is located in an area of Narellan characterised by low density residential development that is interspersed with undeveloped fields reflecting its former rural land use. It adjoins the existing Narellan residential area and is located at the eastern edge of the Elderslie release area. Surrounding development comprises:

- Camden golf course to the north
- Camden Bypass and the suburb of Narellan Vale to the south
- The Bicentennial residential estate to the east
- New residential subdivisions and housing associated with the development of the Elderslie release area to the west.

There is a bus stop for Route No. 895 on Lodges Road immediately adjacent to the site. The Route 895 buses provide access to Campbelltown and Camden South via the Narellan town centre. The Narellan town centre shopping precinct which is located approximately 1.5km by road from the site which includes many services and facilities needed to meet the day to day needs of residents in the area.

3.4 Site Analysis

A site analysis plan has been produced by DWP Suters which details the key natural and built environment features, opportunities and constraints of the site. This drawing is included with the architectural plans at **Appendix 3** and is reproduced in **Figure 5** below for reference.

3 Site Context

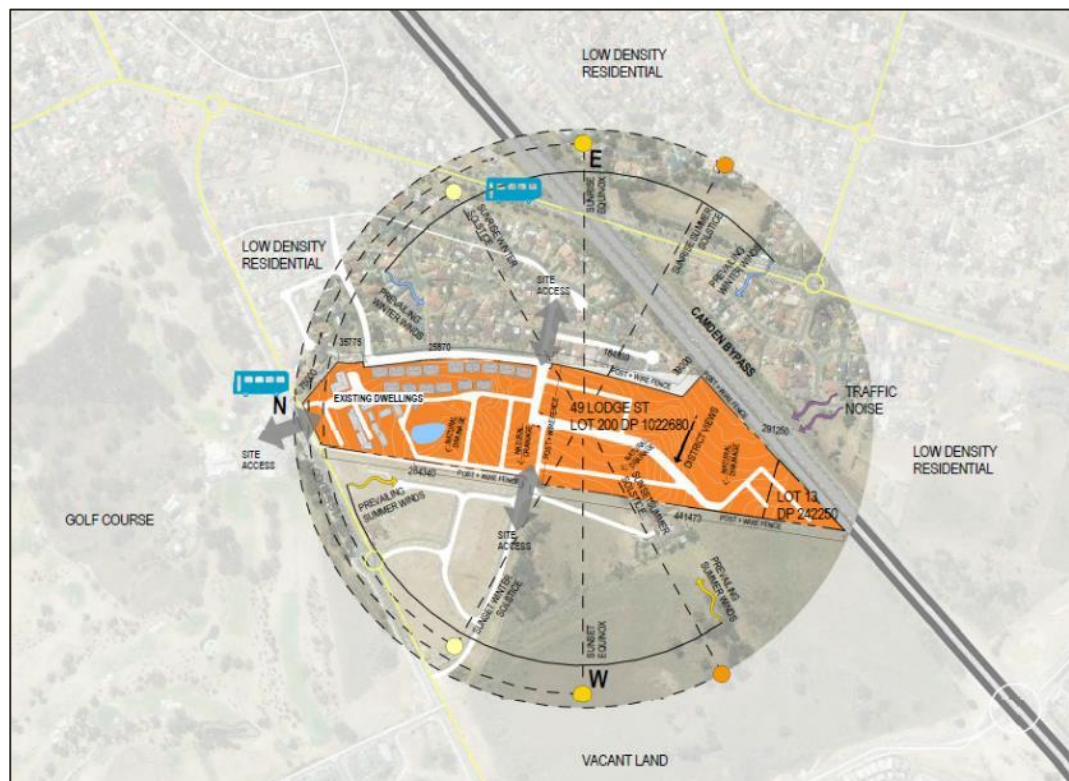


Figure 5 Extract from Site Analysis Plan

4 Proposed Development

Pursuant to the provisions outlined in Section 83B of the *Environmental Planning and Assessment Act 1979*, this proposed masterplan will be a staged development application. The staged DA will relate to the development of that part of the site that is currently undeveloped and will also include changes to the existing retirement village. This staged application is submitted with a concurrent development proposal for stage 1 works.

4.1 Masterplan

The proposed masterplan provides for the following:

- Stage 1 works comprising:
 - Development of 122 affordable housing dwellings comprising:
 - 84 x 1 bedroom villas which will be provided as affordable housing to seniors; and
 - 38 x 2 bedroom townhouses which will be occupied as affordable housing for families who are socially disadvantaged.
 - A new community centre/site manager's office.
 - Road infrastructure to service the development.
 - Essential infrastructure, including stormwater drainage, electrical substation and maintenance shed.
 - Site landscaping, including landscaping with each dwelling 'lot' and landscaped common areas.
 - Community title subdivision to create development parcels within the site.
- A 128 room/134 bed residential aged care facility (RACF). The design of the RACF building is currently being finalised. The RACF component and associated facilities will form part of a future development application.
- Expansion of the existing retirement village. It is notionally proposed to provide 46 villas however the composition and ultimate number of retirement villas to be provided will be determined in the future and will form part of a future development application.
- Expansion of community services offered on site, including day respite centre (within an existing building).

Architectural plans of the proposed development have been prepared by DWP Suters Architects and are included at **Appendix 3** to this SEE.

The following subsections provide a more detailed description of the proposed development.

4.2 Stage 1 Development

4.2.1 Seniors and Affordable Housing

It is proposed to undertake the seniors and affordable housing components of the development, as well as the infrastructure and landscaping works, as part of the Stage 1 DA.

The residential components of the development will comprise:

- 84 x 1 bedroom villas which will be provided as affordable housing to seniors; and
- 38 x 2 bedroom townhouses which will be occupied as affordable housing for families who are socially disadvantaged.

A 'salt and pepper' approach to providing the townhouses throughout the affordable housing development has been undertaken to provide a mix of dwelling styles throughout the site, as well as social inclusion and greater community cohesion.

4 Proposed Development

A variety of roof styles is proposed to provide diversity within the development and the range of materials and colours has been selected to provide cohesive yet interesting streetscapes throughout the development site.

An Urban Design Assessment and Design Statement for the development have been prepared. A copy of the Urban Design Assessment report is included at **Appendix 4** to this SEE. The design statement has been prepared by Dwp Suters and is at **Appendix 3** to this SEE.

Each dwelling unit will be located on its own 'allotment'. The typical villa lot will have dimensions of 10m x 20m and a total area of 200m². The typical townhouse lot will have a width of 7.5m and a depth of 20m and a total area of 150m².

The dwellings have been designed as a duplex with two dwellings within each building.

Each villa will have a combined kitchen/dining/living area, a separate bedroom and bathroom. A laundry will be provided within a cupboard. The gross floor area (GFA) of each typical villa will be 55m² and a maximum floor space ratio (FSR) (to its own lot) of 0.275:1. A minimum of 120m² of landscaped area will be provided within the allotment for each villa.

The townhouse floorplan will comprise a combined kitchen/dining/living area, together with a separate toilet and laundry cupboard on the ground floor and two bedrooms and a bathroom on the upper level. The GFA of each typical townhouse will be 80m² with a maximum FSR of 0.53:1 to its own allotment. Typically, minimum of 75m² of landscaped area will be provided for each townhouse.

Each villa and townhouse will have frontage to a road or access way (which will have a minimum width of 10m) and a car port which will be setback approximately 2.5m from the lot frontage.

The kitchens in both the villas and townhouses have been positioned to the front of each dwelling. The setback to the dwellings will be generally 5.5m (in the case of the villas) and 4m in the case of the townhouses.

The rear setbacks will vary depending on the configuration of the lots but will typically be a minimum of 5m (to the rear wall of the villas) and approximately 5.7m to the rear wall of the townhouses.

The dwellings have been designed so that the living areas have direct access to the rear private open space areas. A paved area will be directly accessible from the living areas of both dwelling styles within the rear yards. Each dwelling will be provided with a clothes line and garbage bins will be able to be stored within each lot behind a screening fence.

Behind the building line of each dwelling, it is proposed to fence each allotment. Fencing will comprise 1.8m paling fencing or similar. Fencing is not proposed forward of the building line or along the frontage of each allotment.

The architectural plans at **Appendix 3** to this SEE include typical floorplans for both dwelling types.

4.2.2 Community Centre

A centrally located community centre for use by all residents will be provided.

Facilities within the centre will include a manager's office, administration and reception area, meeting rooms, common room, toilets, a hall and kitchen area. A covered deck is proposed to be provided directly off the hall. This will in turn lead to an adjoining landscaped park which will act as a breakout area from the hall component of the community centre.

Nine car parking spaces, including two accessible spaces are proposed to be provided directly adjacent to the community centre

4 Proposed Development

4.2.3 Landscaping

Landscape plans for the development have been prepared by Scape Design and are included at **Appendix 5** to this SEE.

The plans provide details for landscaping throughout the development site as well as detailed plans for the landscaping within each dwelling allotment, embellishment of the pocket parks throughout the development site and street tree planting.

A planting regime which identifies when the various species proposed to be planted will flower is also included together with a furniture palette detail plan also showing details of paving and equipment to be provided within some of the pocket parks.

Street tree planting will be provided along the proposed link road and accessways. In addition, lawn areas and trees will also be provided within the front setbacks of each dwelling unit and within each back yard.

Several central communal open space areas are proposed to be provided. The landscaping to be provided within these areas will vary depending on their location and function.

A series of accessible paths linking the dwellings with the communal open space areas, car parking areas, community room and public roads are also proposed to be provided. The topography of the site is proposed to be modified so that all paths within the development will have a maximum gradient of 1 in 20 to avoid the need to install hand rails.

4.2.4 Internal Road Network

All roads to service the master plan development are proposed to be provided within Stage 1.

Three vehicular access points to the development site are proposed. These will comprise:

- The existing access to Lodges Road
- A new access point from Sirius Circuit (to the east)
- A new access point from the proposed Bowerman Road at the southern extremity of the site.

A link road between the Sirius Circuit access and Bowerman Road access is proposed to be provided. This link road will have a road reserve width of 16 and a carriageway width of 8m. This road will be constructed to a local road standard in accordance with Council's standards. Footpaths and landscape verges are proposed to be provided within the 4m reservations either side of the link road carriageway. It is proposed that this road will be publicly accessible.

Other minor accessways will be provided off this link road to service the dwellings within the development. The accessways will have a width of 10m and a carriageway width of 6m.

Designs for the road and accessway network throughout the site are included as part of the Civil Engineering package of plans and drawings at **Appendix 6** to this SEE.

4.2.5 Car Parking

Each dwelling within Stage 1 will be provided with a covered car parking space. The villa car ports will be 5.4m long x 4.06m wide. The townhouse car ports will measure 5.2m x 3.2m.

In addition to these spaces, nine spaces are proposed to be provided immediately adjacent to the community centre and a further 12 spaces are proposed to be provided as 90° spaces off the proposed link road, near Pocket Park 1.

Car parking will also be available along one side on the link road.

4.2.6 Stormwater Infrastructure

The stormwater infrastructure has been designed based on the total site development as shown in the master plan drawing at **Appendix 3**.

4 Proposed Development

The site stormwater drainage design by SCP Consulting has been provided in accordance with the requirements of Camden Council's DCP 2011, Design Specification, Australian Rainfall and Runoff (1987) and Australian Standard 3500.3 Plumbing and Drainage.

Stormwater infrastructure to be provided includes on site detention (OSD) in the forms of an underground tank, modifications to the existing dam and a dry detention basin at the head of Herbert Rivulet.

The following treatments are proposed to be implemented to ensure the quality of water leaving the site satisfies Council's water quality targets:

- Minimum 3,000L Rainwater Tanks provided for each dwelling;
- 150m² Biofiltration Garden above the Underground OSD Tank (OSD 1);
- 390m² Vegetated Dry Detention Basin and Inlet Swale (OSD 2);
- 1,200m² Wetland with 300m² Biofiltration Zone (OSD 3).

Details of stormwater management measures including OSD and water quality treatment are included in the civil engineering plans and report at **Appendix 6**.

4.2.7 Subdivision

It is proposed to subdivide the site into five development parcels under a community title subdivision.

The pocket parks, community centre and dam, together with access roads, with the exception of the link road (which will be Lot 5 in the community title) will comprise Lot 1 in the community title.

The existing retirement village and proposed additional 46 villas will comprise Lot 2.

The Stage 1 dwellings will be Lot 3.

Lot 4 will be the land to be occupied by the RACF and RACF car park.

A plan of subdivision which identifies the various community parcels within the site is included at **Appendix 7** to this SEE.

4.3 Proposed Future Development

4.3.1 Residential Aged Care Facility

A future DA will be lodged to develop a 134 bed, two storey residential aged care facility (RACF) at the southern end of the site. The RACF will have frontage to the link road and a separate car parking area to service to the RACF will be provided adjacent to that facility.

4.3.2 Retirement Village Villas

It is proposed to expand the existing retirement village component of development on the site. Notionally, it is proposed to develop a further 46 villas on site. BaptistCare will assess the market with respect to the composition and timing of these villas in the future. Although these villas will not form part of the Stage 1 DA, it is proposed that all infrastructure required by these villas, including roads and all services, will be provided as part of the Stage 1 works. The DA will be for the detailed designs and layouts of the villas.

4.4 Demolition and Site Preparation

In order to allow site only works to proceed, a separate DA will be lodged for demolition site, remediation and site works. It is anticipated that this DA will be lodged shortly.

5 Approvals, Permits and Licences

The proposed development requires or may be deemed to require several approvals, consents, licences, permits or permissions from various government departments, pursuant to legislation other than the EP&A Act.

This section outlines relevant other legislation including the approvals, licences and permits which may need to be sought concurrently with the subject DA. This outline is structured under headings relating to the responsible Government departments and approval authorities.

5.1 Mining Subsidence

In accordance with Section 15 of the Mine Subsidence Compensation Act 1961, the subject site is identified as within the South Campbelltown Mine Subsidence District – refer **Figure 6**. As this proposal seeks approval to alter or erect improvements within a mine subsidence district, the application is categorised as ‘Integrated Development’ pursuant to section 91 of the EP&A Act 1979. As such, the proposal requires approval from the Mining Subsidence Board (MSB).

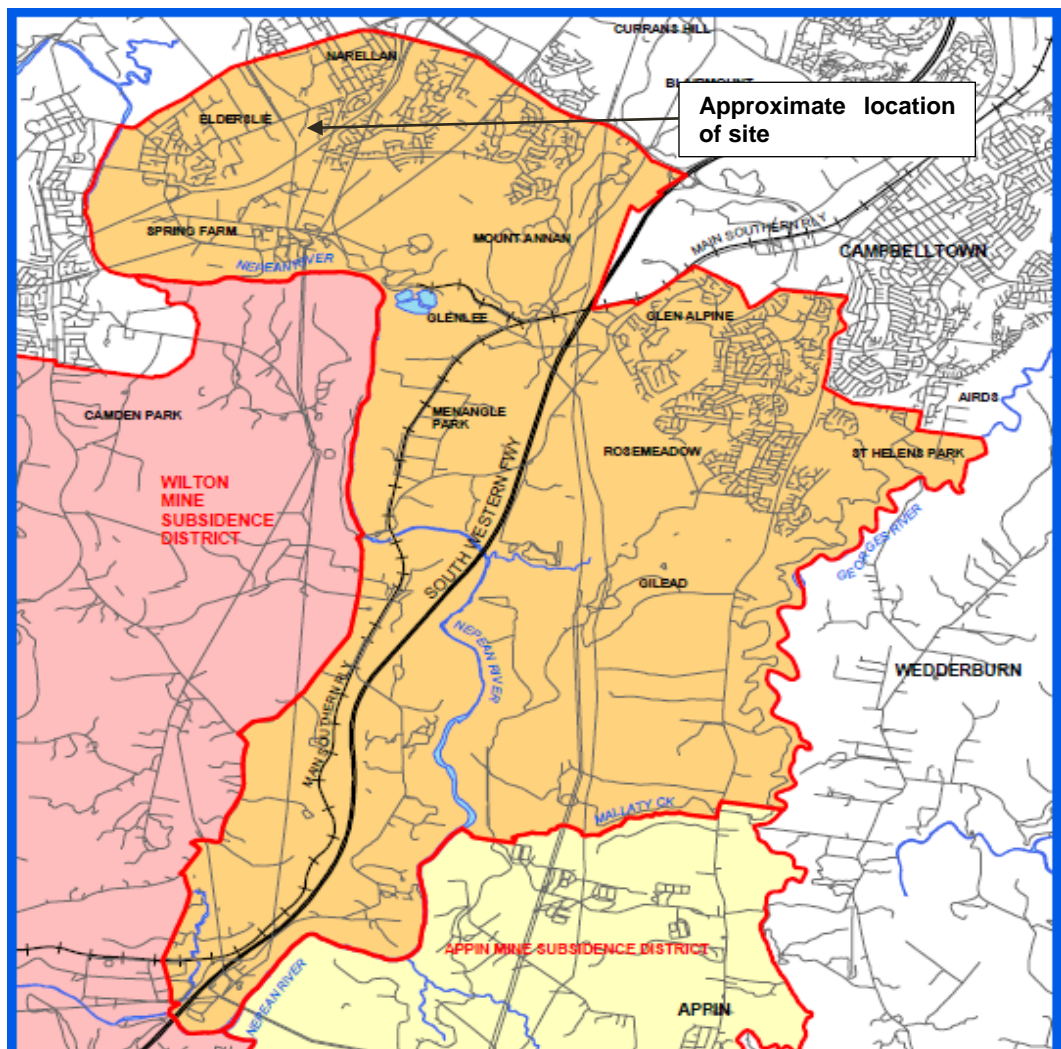


Figure 6 South Campbelltown Mining Subsidence District Map

Initial discussions with the MSB have taken place and MSB has issued preliminary advice. A copy of that advice is included at **Appendix 8** to this SEE.

5 Approvals, Permits and Licences

A geotechnical assessment in relation to an earlier development application (DA393/2011) was undertaken by Geo Enviro and a copy of that assessment is included at **Appendix 9** to this SEE¹.

The geotechnical assessment makes a number of preliminary recommendations with respect to foundations and site preparation. The recommendations of this assessment will be required to be taken into consideration during site preparation works and the structural engineering design of the footings of the retaining walls, roads and buildings.

5.2 Water Management Act 2000

The Office of Water in conjunction with Camden Council has established a Riparian Corridor adjacent to Vicary Avenue located centrally along the western boundary of the Baptist Care site. This Riparian Corridor defines the commencement of the Herbert Rivulet and is considered a First Order Stream.

As the development includes works within 40m of a defined water course, the development is integrated development and will be required to be referred to NSW Office of Water which is an agency of NSW Department of Primary Industries.

¹ The appendices to the GeoEnviro geotechnical report have not been included at Appendix 9 however the appendices are included in the electronic copy of this report which was submitted with this DA

6 Environmental Planning Assessment

This section provides an environmental assessment of the proposed development in respect of the relevant matters for consideration under Section 79C(1) of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

6.1 Planning Controls

The following subsections assess the proposal against the relevant provisions of applicable Environmental Planning Instruments (EPIs), Draft EPIs, Development Control Plans (DCPs), Planning Agreements and matters prescribed by the Regulation in accordance with Section 79C(1)(a) of the EP&A Act.

The proposed development comprises two different forms of affordable residential development – self-contained seniors housing and affordable housing suitable for occupation by families.

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (SEPP Seniors) will apply to that part of the development which is proposed to be developed for the purposes of seniors housing.

The most appropriate land use description for the family housing component of the development would be as group homes. In this regard, each family dwelling is considered to be a group home. An assessment of this component of the development against the provisions of Division 7 of State Environmental Planning Policy (Affordable Rental Housing) 2009 has been undertaken in Section 6.1.2 of this SEE.

Both components of the development have also been assessed having regard to the relevant provisions of Camden Local Environmental Plan (LEP) 2010 and Camden Development Control Plan (DCP) 2011.

6.1.1 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The following is an assessment of the seniors housing component of the proposed development against the relevant provisions of SEPP Seniors.

Table 2 Assessment against Relevant Provisions of SEPP Seniors

Clause	Provision	Assessment	Criteria
4	Land to which the SEPP applies	<p>The site does not constitute environmentally sensitive land pursuant to Schedule 1 of SEPP Seniors.</p> <p>The site is zoned R1 General Residential.</p> <p>Permissible development that can be undertaken in the R1 zone with consent includes:</p> <ul style="list-style-type: none">• Boarding houses;• Community facilities;• Dwelling houses;• Group homes;• Multi dwelling housing;• Places of public worship;• Residential flat buildings;• Respite day care centres;• Semi-detached dwellings; and• Seniors housing	Yes

6 Environmental Planning Assessment

Table 2 Assessment against Relevant Provisions of SEPP Seniors

Clause	Provision	Assessment	Criteria
8	<p>Definition of Seniors:</p> <ul style="list-style-type: none"> a) people aged 55 or more years, b) people who are resident at a facility at which residential care (within the meaning of the Aged Care Act 1997 of the Commonwealth) is provided, c) people who have been assessed as being eligible to occupy housing for aged persons provided by a social housing provider. 	The proposed seniors housing component complies with this definition.	Yes
16	Development consent required	A DA will be required to be submitted to Camden Council	Yes
18	<p>Development allowed by this Chapter may be carried out for the accommodation of the following only:</p> <ul style="list-style-type: none"> a) seniors or people who have a disability, b) people who live within the same household with seniors or people who have a disability, c) staff employed to assist in the administration of and provision of services to housing provided under this Policy. 	The proposed seniors housing component will be made available to persons who meet the criteria as specified in the SEPP.	Yes for seniors housing component
26	<p>Access to Facilities:</p> <ul style="list-style-type: none"> a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and b) community services and recreation facilities, and c) the practice of a general medical practitioner. <p>Requirements for access:</p> <ul style="list-style-type: none"> • Services are within 400m and are accessible via a suitable access pathway; OR • For sites within the Sydney SD, within 400m of public transport which is accessed via a suitable access pathway and is available at least once per day between 8am and 12pm and between 12pm and 6pm Monday to Friday OR • For sites outside the Sydney SD, within 400m of public transport which is accessed via a suitable access pathway and will take residents to within 400m of the facilities and is available during daylight hours at least once per day, Monday to Friday. <p>Refer Clause 26 for more detail regarding gradients of accessible pathways</p>	<p>Refer discussion regarding site suitability in Section 6.4 of this SEE.</p> <p>There is a bus stop immediately adjacent to the site on Lodges Road.</p> <p>The bus service provides access to the Campbelltown regional centre, via the Narellan shopping centre.</p> <p>These centres all include services and facilities described in Clause 26(a), (b) and (c) and the access to the bus stop complies with the provisions of Clause 26.</p> <p>The frequency of bus service complies with Clause 26.</p>	Yes
27	Bush Fire Prone Land	The site is not identified as being bushfire prone land	N/A

6 Environmental Planning Assessment

Table 2 Assessment against Relevant Provisions of SEPP Seniors

Clause	Provision	Assessment	Criteria
28	Housing to be connected to a reticulated water system and have adequate facilities for the removal or disposal of sewage.	These services are available to the site. Some augmentation of services may be required.	Yes
30	Site Analysis: <ul style="list-style-type: none"> • Site details • Topography • Services • Existing vegetation • Micro climate – orientation and winds • Existing structures, access, etc • Views • Overshadowing • Neighbouring buildings • Privacy • Setbacks • Street frontage infrastructure • Character • Location of and distance to services • Parks • Bushland Adjoining land uses	<p>A detailed site analysis plan has been prepared by DWP Suters Architects and a copy of this is included at Appendix 3 to this SEE.</p> <p>A site analysis is also provided in Section 3 of this SEE.</p> <p>An assessment of the suitability of site for the proposed development is included at Section 6.4 of this SEE.</p> <p>The characteristics of the site have informed the design of the development.</p>	Yes
31	Design of Infill self-care housing to take into consideration the provisions of the <i>Seniors Living Policy: Urban Design Guideline for Infill Development</i> published by the Department of Infrastructure, Planning and Natural Resources in March 2004.	The provisions of <i>Seniors Living Policy: Urban Design Guideline for Infill Development</i> will be required to be taken into account	Capable of compliance
33	Neighbourhood Amenity and streetscape	<p>The surrounding character of the area comprises mainly low density detached dwellings.</p> <p>The proposed streetscape as shown in the elevation plans and perspectives in the architectural plan set at Appendix 3 indicate that the bulk, scale and density of the proposed development is appropriate and will not adversely impact on the amenity of the area or the streetscape</p>	Capable of compliance
34	Visual and acoustic privacy	<p>The development has been designed to minimise impacts on adjoining residents.</p> <p>Dwellings 1 – 14 have been positioned to the below the line of sight of dwellings to the east to ensure there are no impacts on views and the privacy of adjoining residents is not affected.</p> <p>Internally, it is considered that the design of the dwellings is such that the privacy of residents can be appropriately addressed.</p>	Capable of compliance

6 Environmental Planning Assessment

Table 2 Assessment against Relevant Provisions of SEPP Seniors

Clause	Provision	Assessment	Criteria
35	Solar access and design for climate	The seniors housing dwellings have been oriented to maximise the number of dwellings with access to sunlight.	Yes
36	Stormwater	Stormwater management is addressed in Section 6.2.3 of this SEE.	Yes
37	Crime Prevention	A CPTED assessment of the development has been undertaken – refer Section 6.2.9 of this SEE.	Capable of compliance
38	Accessibility	An accessibility assessment has been undertaken by Morris Godding Access Consultants. A copy of that assessment is included at Appendix 10 to this SEE. That assessment concludes that the development is capable of complying with the requirements of the relevant Australian Standards, Building Code of Australia (BCA), DDA Access to Premises Standards (including DDA Access Code) and ultimately the Commonwealth Disability Discrimination Act (DDA).	Capable of compliance
39	Waste Management	Suitable and appropriate waste management arrangements have been provided. Refer discussion at Section 6.2.7 of this SEE.	Capable of compliance
40 NOTE: BaptistCare is a registered social housing provider. Therefore, there are certain development standards which do not apply. These have not been included	<p>Development Standards:</p> <p>Height:</p> <ul style="list-style-type: none"> If the development is in a residential zone in which residential flat buildings are not permitted, the maximum height of buildings must be 8m or less² <p>AND</p> <p>a building that is adjacent to a boundary of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) must be not more than 2 storeys in height,</p>	<p>The site is within a residential zone in which residential flat buildings are permitted and therefore the provisions of this clause are not applicable.</p> <p>The proposed development is restricted to a maximum height of two storeys.</p>	Yes
41	Standards for hostels and self-contained dwellings NOTE: The following provisions in Schedule 3 of the SEPP Seniors do not apply to social housing providers:	BaptistCare is a registered social housing provider – refer Appendix 18 .	Capable of compliance

² **height** in relation to a building, means the distance measured vertically from any point on the ceiling of the topmost floor of the building to the ground level immediately below that point.

6 Environmental Planning Assessment

Table 2 Assessment against Relevant Provisions of SEPP Seniors

Clause	Provision	Assessment	Criteria
	<p>Clauses 2, 7, 8, 9, 10, 11, 12, 13 and 15–20 of Schedule 3, a self-contained dwelling, or part of such a dwelling, that is located above the ground floor in a multi-storey building does not have to comply with the requirements of those provisions if the development application is made by, or by a person jointly with, a social housing provider.</p> <p>The following standards of Schedule 3 are relevant to the development:</p> <p>3. Security - Pathway lighting:</p> <p>(a) must be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and</p> <p>(b) must provide at least 20 lux at ground level.</p> <p>4. Letterboxes:</p> <p>(a) situated on a hard standing area and have wheelchair access and circulation by a continuous accessible path of travel</p> <p>(b) lockable</p> <p>(c) central location</p> <p>5. Private Car Accommodation</p> <p>If car parking is provided:</p> <p>(a) spaces must comply with parking for persons with a disability as set out in AS2890</p> <p>(b) 5% of spaces to have a minimum width of 3.8m</p> <p>(c) N/A as no garages are proposed</p> <p>6. Accessible Entry</p> <p>Every entry must comply with clauses 4.3.1. and 4.3.2 of AS4299</p>	<p>Street lighting is proposed to be provided</p> <p>Each dwelling will be provided with a letterbox at its front entry.</p> <p>The car ports for the seniors villas will be 4.06m wide.</p> <p>The entries comply with these requirements – refer Accessibility assessment at Appendix 10.</p>	
Part 7	<p>Development Standards that cannot be used as grounds to refuse consent. This Part has no effect if:</p> <ul style="list-style-type: none"> the provisions relating to the design principles in Part 3 (Clauses 30 -39) have not been adequately addressed; and <p>the development is undertaken on land to which an interim heritage order or listing on the State Heritage Register under the Heritage Act 1977 applies.</p>	The site is not a heritage item	N/A

6 Environmental Planning Assessment

Table 2 Assessment against Relevant Provisions of SEPP Seniors

Clause	Provision	Assessment	Criteria
50	Standards that cannot be used to refuse development consent for self-contained dwellings ³ : <ul style="list-style-type: none"> • Building height – 8m • Density and scale – FSR 0.5:1 • Landscaped area – 35m² per dwelling 	<ul style="list-style-type: none"> • Height is less than 8m • Approx. FSR 0.275:1/lot • Each dwelling will be provided with approximately 120m² of landscaped area. In addition to this private open space, pocket parks are also proposed to be provided. 	<ul style="list-style-type: none"> Yes Yes Yes
	<ul style="list-style-type: none"> • Deep soil zones – 15% 	<ul style="list-style-type: none"> • The majority of landscaped areas will function as deep soil zones 	<ul style="list-style-type: none"> Yes
	<ul style="list-style-type: none"> • Solar access – 70% of dwellings to receive at least 3 hours of sunlight between 9am and 3pm. 	<ul style="list-style-type: none"> • The orientation of the villas is such that each dwelling will receive the required solar access. 	<ul style="list-style-type: none"> Yes
	<ul style="list-style-type: none"> • Private open space: <ul style="list-style-type: none"> ○ Ground level 15m², minimum dimension of 3m ○ Balconies – min. 10m² (or 6m² for 1 bedroom units) with min dimension of 2m and directly accessible from the living room 	<ul style="list-style-type: none"> • Each dwelling has access to an area >15m² at ground level 	<ul style="list-style-type: none"> Yes
	<ul style="list-style-type: none"> • Parking – 1 space/5 dwellings 	<ul style="list-style-type: none"> • N/A – no second storey dwellings 	<ul style="list-style-type: none"> N/A
		<ul style="list-style-type: none"> • Each dwelling is provided with at least 1 space. 	<ul style="list-style-type: none"> Yes

6.1.2 State Environmental Planning Policy (Affordable Rental Housing) 2009

The affordable housing dwellings for families have been assessed as group homes against the provisions of Division 7 of the ARHSEPP. In this regard, the development does not satisfy the relevant criteria to be able to be considered as complying development as more than 10 bedrooms are proposed. Notwithstanding, the complying development provisions as specified in Schedule 2 of the ARHSEPP have been considered in relation to the design of these dwellings.

BaptistCare is proposing that single parent families will occupy these dwellings – most likely women and children. Although this cohort is the group BaptistCare will be targeting to use the dwellings, BaptistCare also support a number of other persons who would also be classed as *socially disadvantaged* as defined in the ARHSEPP. The SEPP defines people who are *socially disadvantaged* as those who:

- are disadvantaged because of their alcohol or drug dependence, extreme poverty, psychological disorder or other similar disadvantage, or
- require protection because of domestic violence or upheaval.

Group homes can either be permanent group homes or transitional group homes.

A **permanent group home** means a dwelling:

³ The provisions of Clause 50 are non-compulsory development standards. If a DA complies with these provisions is cannot be refused. If the proposal does not comply with, for example, the building height provisions, the application could be refused on the grounds of height.

6 Environmental Planning Assessment

(a) *that is occupied by persons as a single household with or without paid supervision or care and whether or not those persons are related or payment for board and lodging is required, and*

(b) *that is used to provide permanent household accommodation for people with a disability or people who are socially disadvantaged,*

but does not include development to which State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 applies.

A **transitional group home** means a dwelling:

(a) *that is occupied by persons as single household with or without paid supervision or care and whether or not those persons are related or payment for board and lodging is required, and*

(b) *that is used to provide temporary accommodation for the relief or rehabilitation of people with a disability or for drug or alcohol rehabilitation purposes, or that is used to provide half-way accommodation for persons formerly living in institutions or temporary accommodation comprising refuges for men, women or young people,*

but does not include development to which State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 applies.

There is no time restriction in relation to how long the temporary accommodation within a transitional group home might be provided. It is likely that the group homes to be provided as part of this development will function as transitional group homes, notwithstanding that the occupancy by persons using these homes may extend over a number of years.

Clause 43 of ARHSEPP identifies the prescribed zones within which development for the purposes of permanent group home or a transitional group home may be carried out. The R1 General Residential zone, which applies to the subject site, is identified as prescribed zone and therefore development for the purposes of group homes is permissible on the site.

Clause 46 of ARHSEPP requires the consent authority to assess the community need for the group home. This assessment is included in **Section 6.2.12** of this SEE.

6.1.3 State Environmental Planning Policy No. 55 – Remediation of Land

A site contamination assessment has been undertaken by Douglas Partners. That assessment found that site remediation will be required to make the site suitable for the proposed development.

A separate DA will be lodged for demolition works, site remediation and associated earthworks.

6.1.4 State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

The proposed development is a BASIX affected development under the definitions and provisions of State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004. Pursuant to the provisions of the Environmental Planning & Assessment Regulation 2000, the development application is required to be accompanied by a valid BASIX Certificate. Efficient Living has prepared a BASIX Certificate which indicates that the dwellings achieve the targets for water, thermal comfort and energy.

The BASIX notated plans are attached at **Appendix 11** of this SEE.

6.1.5 Camden Local Environmental Plan 2010

The following section provides an assessment of the proposed development against the relevant provisions of the LEP.

Table 3 provides a summary assessment of the proposed development against the relevant provisions of the LEP.

6 Environmental Planning Assessment

Table 3 Assessment against Relevant Provisions of Camden LEP 2010

Provision	Assessment	Consistent
Clause 2.2 – Zoning - R1 General Residential	A range of residential development types are permitted with consent in the R1 zone, including residential flat buildings, group homes and seniors housing	Yes
Floor space ratio	There is no FSR provision relevant to the site. The concept scheme prepared by DWP Suturs Architects provides for an appropriate FSR of 0.275:1 for each seniors housing dwelling to its lot and 0.53:1 for each group home dwelling.	Yes
Building Height 9.5m for the majority of the site. Part of the site, adjacent to the eastern boundary is subject to a maximum building height of 6.5m – see Figure 8	The building heights comply with the building height maximums as specified in the LEP. The building height lines are shown on the architectural plans at Appendix 3 .	Yes

Zoning

Pursuant to Clause 2.2 of the Camden LEP 2010 the site is zoned R1 Residential (See **Figure 7** below). A range of residential development types are permitted with consent in the R1 zone, including residential flat buildings, group homes and seniors housing. Seniors Housing and Affordable Rental Housing are also permitted in the R1 zone with consent under the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 Seniors SEPP) and State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP) respectively.

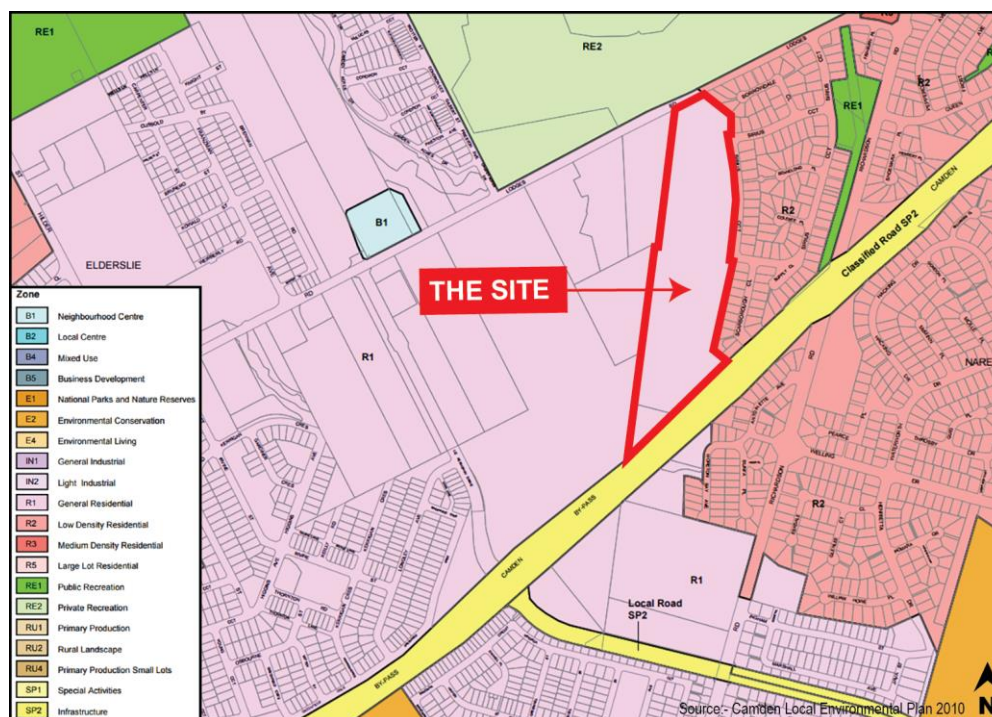


Figure 7 Zoning Map Extract

6 Environmental Planning Assessment

Height of Buildings

Pursuant to Clause 4.3 of the Camden LEP 2013, two maximum height of building controls apply to the site. As shown in **Figure 8** below, the maximum allowable height is 9.5m for the majority of the site and 6.5m for a small parcel at the eastern extent of the site (Labelled F below).

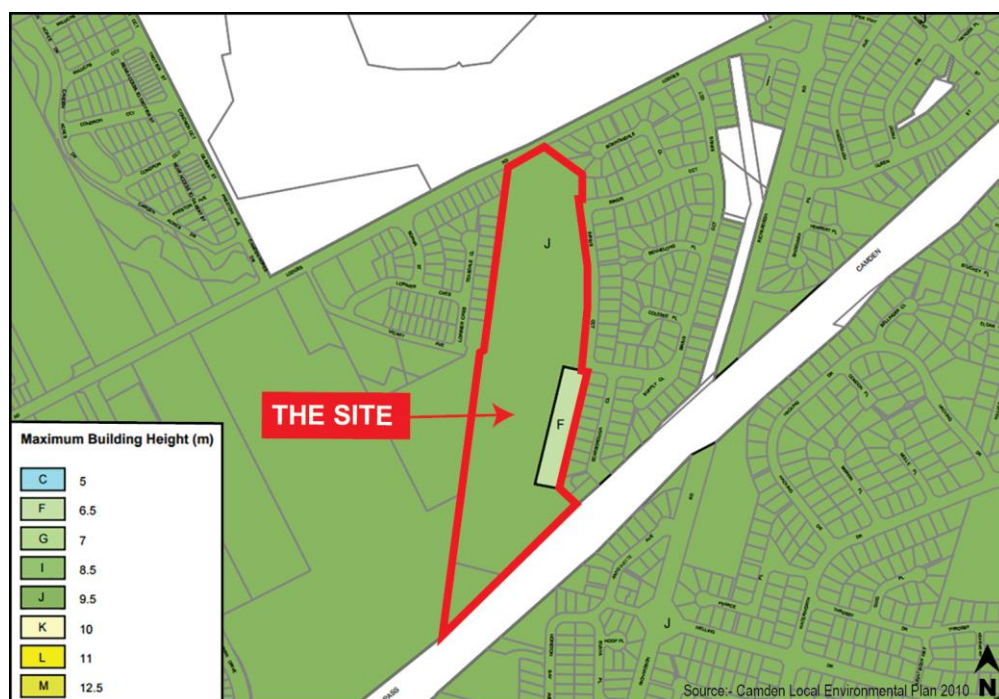


Figure 8 Height of Buildings Map Extract

Urban Release Area

The site has been identified as being within an Urban Release Area pursuant to Part 6 of the Camden LEP 2010.

Clause 6.2 outlines requirements to ensure essential public utility infrastructure for the proposed development is available or that adequate arrangements have been made to make that infrastructure available. In this regard, the site is fully serviced, with all essential infrastructure currently available to the property.

With respect to water and sewer servicing, preliminary advice has been received from Sydney Water which states that potable water connection is available from the existing 200mm Sydney Water main in Lodges Road and the sewer connection is available from the existing Sydney Water Sewer on the adjoining property to the west.

Webb Australia has liaised with the local electricity supply authority who has advised that the development will require a new padmount kiosk substation for the electricity supply. It is proposed to locate this substation on the link road, within Pocket Park 4. The indicative location of the substation is shown on the architectural plan set at **Appendix 3**. A copy of the electrical servicing advice is included at **Appendix 13**.

6 Environmental Planning Assessment

Clause 6.3 requires that development on land in an urban release area occurs in a logical and cost-effective manner, in accordance with a staging plan and a specific development control plan. In this regard, Chapter C6 of the Camden DCP relates to this clause and provides controls to ensure the aforementioned objectives are achieved. **Section 6.1.6** of this SEE discusses the proposed development in relation to the controls outlined in Chapter C6 in further detail.

Earthworks

Clause 7.4 details provisions relating to earthworks and seeks to ensure that environmental impacts associated with proposed earthworks are not unacceptable.

A separate DA will be lodged for site remediation and associated site works, including benching of the site. A geotechnical assessment was undertaken by Geo Enviro in relation to a previous DA (DA393/2011) and this has informed the methodology for the bulk earthworks.

6.1.6 Camden Development Control Plan 2011

Table 4 provides a summary assessment of the proposed development against the relevant provisions of the DCP.

Table 4 Assessment against Relevant Provisions of DCP		
Provision	Assessment	Consistent
A2 Notification and Advertising Requirements	Council is required to notify the proposed development in accordance with Camden DCP 2011 and consider any submissions received during the notification period.	Yes
B1.1 Erosion and Sedimentation	Erosion and sediment control plans have been prepared by SCP Consulting in accordance with the provisions of Section B1.1. Refer Civil Engineering plans and report at Appendix 6 .	Yes
B1.2 Earthworks	A separate DA will be lodged for demolition works, site remediation and bulk earthworks. The provisions of Section B1.2 will be addressed as part of that DA. A geotechnical assessment prepared by GeoEnviro Consultancy Pty Ltd in relation to a previous DA (DA393/2011) and this has informed the methodology for the purposes of undertaking the earthworks on the site. A copy of the geotechnical assessment is included at Appendix 8 . The topography of the site will be required to be modified to ensure accessible paths of travel can be provided throughout the development.	N/A
B1.3 Salinity Management	A separate DA will be lodged for demolition works, site remediation and bulk earthworks. The provisions of Section B1.3 will be addressed as part of that DA. A Salinity Investigation and Management Plan has been prepared by Douglas Partners. The assessment includes management strategies and concludes that if those strategies are implemented, the site can be made suitable for the proposed development.	N/A
B1.4 Water Management	Section 6.2.3 of this SEE includes discussion regarding water management including stormwater drainage management and water quality treatments. The water management regime has been designed having regard to the controls in Section B1.4.	Yes

6 Environmental Planning Assessment

Table 4 Assessment against Relevant Provisions of DCP

Provision	Assessment	Consistent
B1.5 Trees and Vegetation	As part of the earthworks that will be undertaken as part of a separate DA, several trees in the vicinity of the existing dam will be removed. An arborist assessment will be submitted with that DA. That assessment will also include tree protection measures for the trees to be retained.	N/A
B1.9 Waste Minimisation	A waste management plan (WMP) has been prepared by Waste Audit and Consultancy Services. A copy of the WMP is included at Appendix 14. Section 6.2.7 of this SEE includes discussion regarding construction and operational waste management. A separate DA will be lodged for demolition works.	Yes
B1.13 Mine Subsidence	The site is within a mine subsidence district therefore the application will be required to be referred to the Mine Subsidence Board. Refer preliminary advice from MSB at Appendix 8 .	Yes
B1.16 Acoustic Amenity	An acoustic assessment has been undertaken by Acoustic Logic. A copy of that assessment is at Appendix 15 to this SEE. Further discussion regarding acoustic impacts and recommended treatments to mitigate noise impacts is at Section 6.2.10 of this SEE.	
B2 Landscape Design	Landscape plans have been prepared by Scape Design and are included at Appendix 5 to this SEE.	
B5 Access and Parking	A Traffic Impact Assessment has been prepared by Seca Solution – refer Appendix 16 to this SEE. See also discussion at Section 6.2.6 of this SEE.	
C6 Elderslie Release Area	See discussion at the end of this table.	
D2.3.1 Residential Development - Elderslie Release Area	See discussion at the end of this table.	

6 Environmental Planning Assessment

Section C6 - Elderslie Release Area

The site is within the Elderslie release area and therefore the provisions of Section C6 of the DCP will need to be taken into consideration in relation to any future development on the site.

Relevantly, the Elderslie Master Plan (Figure C12 in the DCP) provides for a road pattern across the site and other land within the release area. An extract from the master plan is provided in **Figure 9** below.

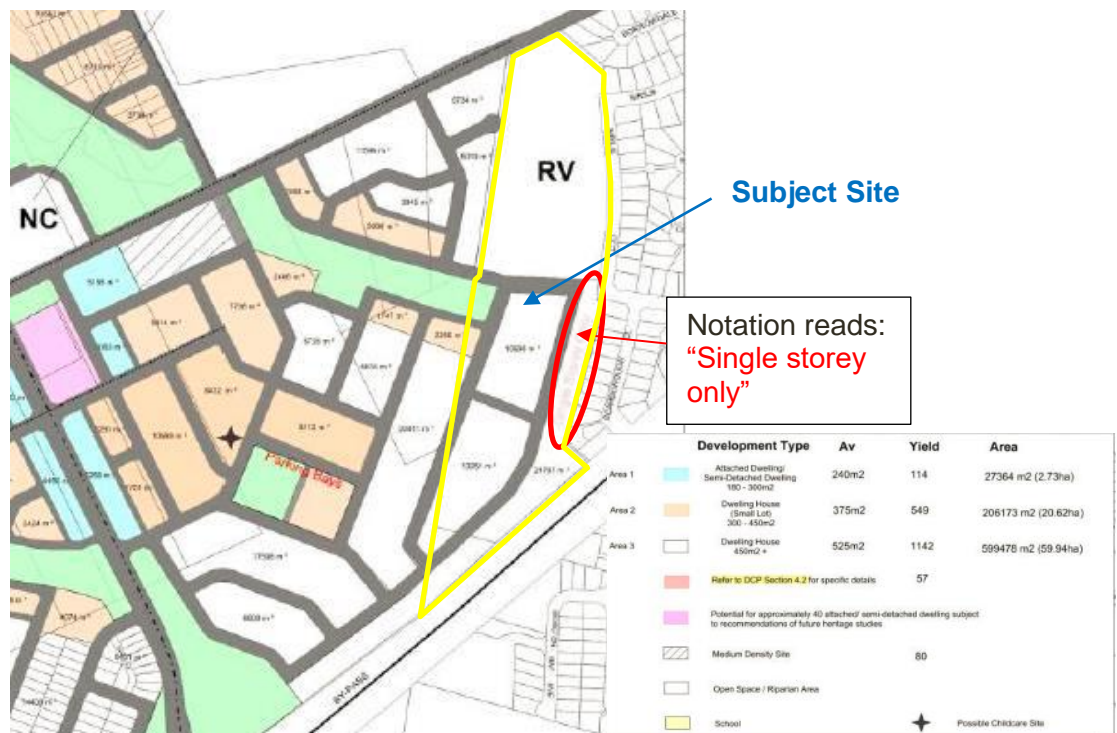


Figure 9 Extract from Camden DCP 2011 Elderslie master plan (Figure C12)

The site is within Area 3. The DCP envisages free standing one and two storey dwellings with some duplexes and buildings containing 3 or 4 apartments on land identified as Area 3. The site has not been identified as the medium density housing site within Elderslie.

Although the density of the proposed development is potentially greater than that envisaged by Council under the DCP, it is considered appropriate in this instance as the development will be wholly owned and operated by BaptistCare and is a planned community with areas of open space throughout the development.

As discussed in the Urban Design Assessment at **Appendix 4** to this SEE, the development will not be out of character with existing surrounding development or future development. In this regard, the Urban Design Assessment notes that:

The street layout, street hierarchy and block layout established by the masterplan is consistent with the street patterns adjacent and provides vehicular and pedestrian connections to the east, north and south-west. Setbacks, scale, form and spacing of the proposed dwellings is responsive to the needs of these special housing types. Whilst the proposed development will have an increased residential density compared to the surrounding development, the new dwellings have been sited to provide adequate setbacks that allow for streetscape plantings. The landscape design prepared by Scape Design establishes an attractive landscape character for the development. The tree planting will provide tree canopies that are higher than the buildings and create a continuity of vegetation.

The proposal provides for single storey villas and two x two storey townhouses (Town Houses 13 and 14) within the area notated on the Elderslie master plan as being "single storey only".

6 Environmental Planning Assessment

As a result of modification of levels within the site, as demonstrated in the section drawing on Drawing No. A150, all development will be below the building height line and the proposed two storey town houses will not impact on adjoining properties to the east in terms of view loss or loss of privacy.

Residential development, including subdivision, in other areas of Elderslie has been undertaken (as evidenced in the aerial photograph at **Figure 2**). There have been several variations to the DCP road pattern as shown in the master plan. For example, the subdivision occurring to the immediate west of the southern part of the BaptistCare site provides for a new road immediately adjoining the southern property boundary, whereas the DCP envisaged dwellings being constructed between this road and the Camden Bypass.

The proposed development will negate the ability for the road pattern as shown in Figure C12 in the DCP (**Figure 9** in this SEE) to be achieved.

As previously noted, a separate DA will be lodged to facilitate a land swap/boundary adjustment for land in the south-western part of the site.

In order to demonstrate that the proposed development and variations to the road pattern will not impact on the develop ability of the residue, privately owned land to the west of the BaptistCare site, being Lot 300 in DP1197621, two subdivision options for this land have been prepared. Option 1 (**Figure 10**) is a subdivision layout which assumes the owner of Lot 300 collaborates with the owner of other residue parcels (being AV Jennings) to create a residential subdivision. Option 2 (**Figure 11**) is a subdivision layout which demonstrates that Lot 300 can be developed in isolation of other land. Both options demonstrate that it is possible to achieve a similar development yield regardless of the road pattern used.

Therefore, although the road pattern on the BaptistCare site as envisaged in the DCP will not be able to be realised if the development proceeds, the above options demonstrate that the development potential of the adjoining land will not be affected. Further, the variation to the traffic network by the non-provision of these roads has also been considered and the traffic consultant has assessed this as being acceptable.

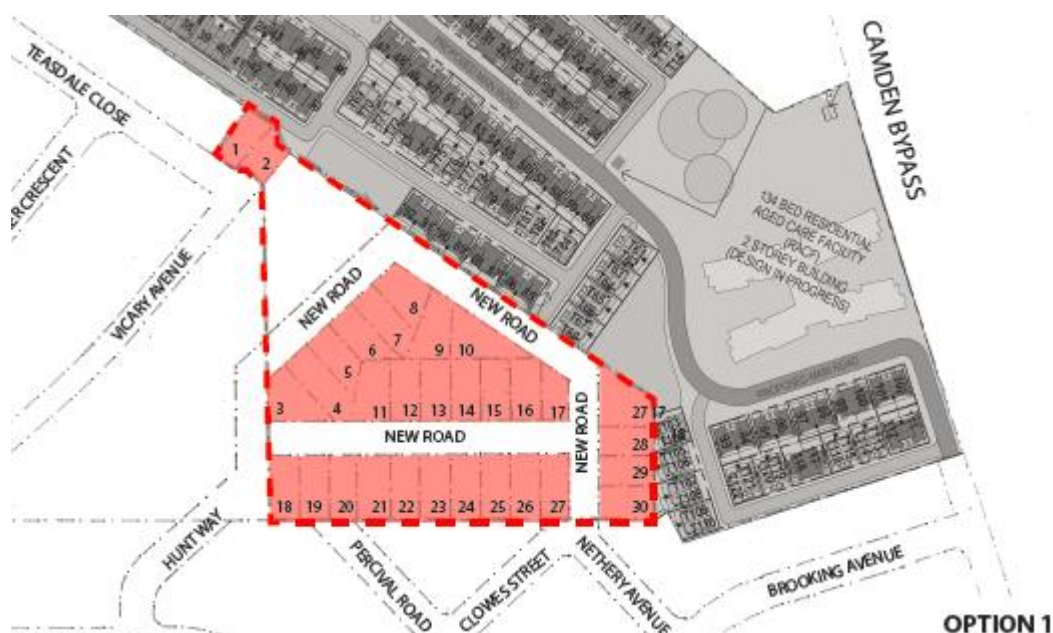


Figure 10 Development option based on collaborative subdivision – Option 1

6 Environmental Planning Assessment

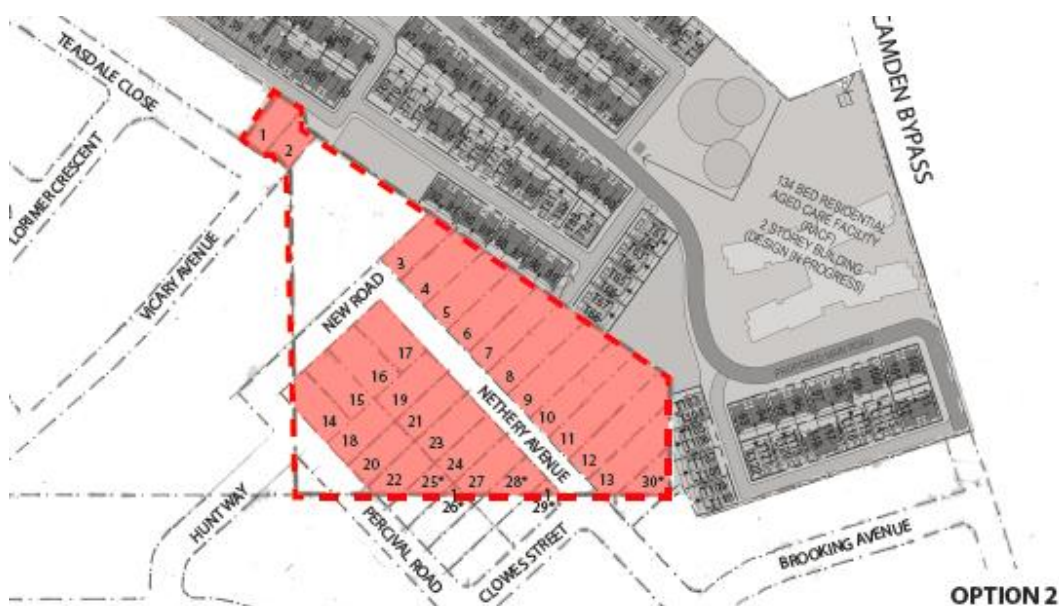


Figure 11 Development option based on Lot 300 being developed in isolation – Option 2

There is an existing electricity easement on land to the west of the site. The location of the electricity easement impacts on the development potential of sections of the residue lots that have been created following residential subdivision of land within the Elderslie release area and also impacts on part of the land on which the proposed development will be located, specifically townhouses 108, 109 and 110.

Advice has been received from Endeavour Energy being the authority responsible for the easement and a copy of that advice is included at **Appendix 13** to this SEE. Endeavour Energy has advised that although there is not infrastructure within the easement it is still of strategic value. Discussions regarding the release of the easement are currently underway with the owner of the adjoining land, AV Jennings. If the easement is not extinguished, construction of townhouses 108, 109 and 110 will be delayed.

The DCP master plan does not provide for access to the site from Sirius Circuit. The Traffic Impact Assessment at **Appendix 16** has considered the traffic generation impacts on the existing residential area to the east of the site by the provision of a link road and considers these impacts acceptable.

Although it is proposed that the link road will be owned by BaptistCare, an easement for public access will be provided to assist with traffic movements within and through the area.

Section D – Residential Development

Section D2.2 of Camden DCP 2011 contains provisions relating to specific forms of residential accommodation. For the purposes of this assessment the provisions relating to multi dwelling housing have been considered. Given the scale and design of the development, some of the provisions of Section D2.2 are not relevant.

The proposed development is considered to be generally consistent with the relevant provisions for multi dwelling housing development in that:

- The maximum site coverage is less than 50%;
- The development is considered to be in keeping with the character of the area;
- The dwellings have been designed to face and address internal private access roads and the new link road;
- The development will result in a single or grouped dwellings that are separated by gardens;

6 Environmental Planning Assessment

- The minimum separation between front facades within the development will exceed the recommended minimum of 12m. The provision of car ports forward of the dwellings, together with on-site landscaping and street planting will avoid gun-barrel vistas. The streetscape impacts are further discussed in the Urban Design Assessment at **Appendix 4**. The streetscape outcomes are demonstrated in the 3D perspectives at **Appendix 3**;
- The dwellings have been designed such that the entrance to each dwelling is clearly identifiable. Visitor car parking has been provided in centralised locations. In addition, Road 1 – the link road - will have sufficient width to allow for car parking along one side of the road. This is demonstrated in the signage plan at **Appendix 6** to this SEE;
- The private open space areas exceed 24m² in area;
- The site will be regraded to ensure the maximum gradient for private open space areas is no greater than 1:10. A separate DA will be lodged for the bulk earthworks component of the development;
- With the exception of townhouses 61 – 68, the private open space areas of all dwellings will receive a minimum of 3 hours between 9.00am and 3.00pm on June 21. To compensate for the lack of solar access to the private open space of these dwellings, they have been located to immediately adjoin one of the pocket parks to be provided within the development; and
- No garages are proposed.

It is considered that the development as shown on the scheme at **Appendix 3** is generally consistent with these provisions.

6.2 Likely Impacts of the Development

The following subsections assess the likely impacts of the development in accordance with Section 79C(1)(b) of the EP&A Act.

6.2.1 Site Preparation Works

A Civil Engineering report has been prepared by SCP Consulting. A copy of this plan is attached at **Appendix 6** to this SEE. The Civil Engineering report is accompanied by a series of plans including:

- Pavement plan
- Erosion and sediment control plan
- Retaining walls details

A separate DA will be submitted to Council for the early works including:

- Site remediation works
- Tree removal
- Bulk earthworks including site benching
- Retaining walls.

Due to the specialised nature of housing to be provided (i.e. affordable housing for seniors, affordable housing for families and (ultimately) a residential aged care facility and additional self-contained seniors housing dwellings), accessible paths of travel along the access roads and pathways are required to be provided throughout the site. The preference is to provide all pathways with a maximum gradient of 1 in 20 to avoid the need to install handrails along the paths. This will avoid the development having an institutional character. Due to the existing topography of the site, in order to provide pathways with a maximum gradient of 1 in 20, significant reshaping of the site is required. The extent of earthworks required is discussed in detail in the early works DA.

6 Environmental Planning Assessment

6.2.2 Urban Design Considerations

An Urban Design Assessment has been undertaken by DFP Planning. A copy of the Urban Design Assessment report is included at **Appendix 4** of this SEE.

Notwithstanding that the development does not wholly comprise seniors housing, the principles of *Seniors Living Policy – Urban Design Guidelines for Infill Development* have been considered as they are also relevant to the group home dwellings and the development as a whole.

In relation to context, the Urban Design Assessment indicates that:

The street layout, street hierarchy and block layout established by the masterplan is consistent with the street patterns adjacent and provides vehicular and pedestrian connections to the east, north and south-west. Setbacks, scale, form and spacing of the proposed dwellings is responsive to the needs of these special housing types. Whilst the proposed development will have an increased residential density compared to the surrounding development, the new dwellings have been sited to provide adequate setbacks that allow for streetscape plantings. The landscape design prepared by Scape Design establishes an attractive landscape character for the development. The tree planting will provide tree canopies that are higher than the buildings and create a continuity of vegetation.

The Urban Design Assessment recognises that the constraints of the site topography and nature of the development proposed necessitate the introduction of retaining walls throughout the development. In order to minimise the impacts of the retaining walls, these have been provided as terraces which serves to reduce their visual impact. **Figure 12** below is a typical elevation view of a 3 tier retaining wall. This demonstrates that the proposed landscape treatment will serve to soften the appearance of the walls.



Figure 12 Typical Elevation of a 3 tier retaining wall

In relation to the design of the development, the Urban Design Assessment notes that:

Dwellings are designed with small scale massing, articulated facades and stepped forms that respond to the topography of the site. The dwellings are broken up with separations between each pair of villas and townhouses. This creates a rhythm of built form to space along the streetscape. Roof forms have been broken into smaller elements to reduce the apparent bulk, scale and visual impact of the dwellings. An overall palette of materials and colours has been developed to create visual interest and a sense of identity.

Overall, it is considered that the proposed development represents an appropriate urban design response having regard to the nature of housing to be provided and the topography of the site.

6.2.3 Water Quantity and Quality

A Civil Engineering report has been prepared by SCP Consulting. A copy of this plan is attached at **Appendix 6** to this SEE. The Civil Engineering report is accompanied by a series of plans including:

6 Environmental Planning Assessment

- Stormwater drainage plan
- Pavement plan
- Erosion and sediment control plan
- Water and sewer plan

These plans are also provided at **Appendix 6** to this SEE.

Flooding and Overland Flow

SCP Consulting has investigated the Nepean River Flood Study dated 2015. Appendix B of that study is the Nepean Flood Maps for the Elderslie area and those maps indicate that the site was not affected by the Probable Maximum Flood (PMF) of the Nepean River or its associated tributaries.

The J. Wyndham Prince Pty Ltd – Elderslie Release Area Water Cycle Master Plan Report dated December 2001 identifies that the site is located within the upper reaches of the Herbert Rivulet and only subject to local flooding such as overland flow along road corridors from Scarborough Close and Sirius Circuit at the very top of the Herbert Rivulet catchment. Figure 3 in the Civil Engineering report at **Appendix 6** shows the extent of the upstream catchment.

The proposed link road will convey these overland flows through the site to the Herbert Rivulet. DRAINS modelling has been undertaken and the road corridor has been designed in accordance with Camden Council Standard Road Sections outlined in DCP 2011 to accommodate the calculated overland flows.

Stormwater Design

The site stormwater drainage design has been provided in accordance with the requirements of Camden Council's DCP 2011, Design Specification, Australian Rainfall and Runoff (1987) and Australian Standard 3500.3 Plumbing and Drainage.

In order to manage stormwater drainage from the site, a management system comprising a series of OSD facilities has been designed. OSD has been developed in accordance with Camden Council DCP 2011 and DRAINS modelling software.

Three OSD systems are proposed:

- An underground storage tank with a capacity of 220m³ and fitted with proprietary drainage cells is proposed within the pocket park in the south-western corner of the site, adjacent to Road 1 (the link road). A non-trafficable biofiltration garden will be provided above this tank. This tank has been designed to accommodate flow from the RACF as well as the Stage 1 development that falls within its catchment.

The tank has been designed having regard to the pre and post development flows for storms up to and including the 100 Year ARI storm event. Pre-development flows have been established as 100% pervious and the post development discharge has been controlled by a 330mm diameter orifice plate.

- The second OSD measure is located adjacent to the Riparian Outlet on the western boundary between Vicary Avenue and Town House 92. It is proposed for this OSD to be provided as a dry vegetated basin.

The proposed detention basin has been designed in accordance with Camden Design Specification Section 3.3.8.

- The third OSD solution is located within the existing dam within the Baptist Care Retirement Village. It is proposed to augment the existing dam and reconstruct the dam into a wetland with a 600mm deep permanent pond.

6 Environmental Planning Assessment

The existing retirement village stormwater drainage system will continue to drain to the wetland including the additional works associated with the redevelopment of the retirement village component (i.e. the 46 additional dwellings).

Water Quality

Camden Council has specified water quality targets for development in relation to gross pollutants (GP), total suspended solids (TSS), total phosphorus (TP) and total nitrogen (TN). In addition, environmental flows are also required to be considered.

The stormwater treatment for the site has been developed to meet the 'Stormwater Management Objective' only and includes the following:

- Minimum 3,000L Rainwater Tanks provided for each dwelling;
- 150m² Biofiltration Garden above the Underground OSD Tank (OSD 1);
- 390m² Vegetated Dry Detention Basin and Inlet Swale (OSD 2);
- 1,200m² Wetland with 300m² Biofiltration Zone (OSD 3).

A MUSIC model was developed incorporating the proposed stormwater treatment items. Each catchment has been assessed individually and the system as a whole has also been considered.

The results meet the Camden Council's Stormwater Management Objectives for GP, TSS, TP and TN.

In addition to these water quality management systems, it is proposed to install erosion and sediment control measures in accordance with Landcom's Soil and Construction Manual (commonly known as the Blue Book).

Erosion and sediment control plans are included at **Appendix 6**.

6.2.4 Civil Engineering

Roads

As part of the Stage 1 works, all services, including road infrastructure for the master planned site will be provided.

The road pavements have been designed having regard to:

- The findings and recommendations of the geotechnical assessments,
- Camden Council's Engineering Design Specifications,
- Austroads Part 2 – Pavement Structural Design 2012;
- Roads and Maritime Services Guide (2015);
- Austroads Guide to Pavement Technology Part 2 – Pavement Structural Design; and
- Design Traffic

Details of pavement design are included on the plans at **Appendix 6**.

The link road (proposed Lot 5 in the Community Title subdivision) has been designed to satisfy Camden Council's specifications for a public road. However, it is proposed to maintain this road as a publicly accessible private road.

6.2.5 Solar Access

Shadow diagrams for the Stage 1 dwellings have been prepared. These are included at **Appendix 3** to this SEE.

Within the site most dwellings are orientated east-west directly fronting the internal street network. This orientation will maximise solar access to living areas and private open spaces.

6 Environmental Planning Assessment

Solar access to private open spaces is maximised. The majority of dwellings will receive a minimum of 3 hours of solar access to their private open space areas in mid-winter. The only exception to this is the rear private open space areas of town houses 61- 68. To compensate for this, these dwellings have been sited adjacent to a pocket park.

Solar access to living areas is acceptable given the east-west orientation of most of the dwellings. Private open spaces are directly accessible from the principal living spaces of each dwelling.

6.2.6 Traffic and Parking

Seca Solution has undertaken a traffic impact assessment for the proposed development and a copy of that assessment is at **Appendix 16** to this SEE. The assessment has been based on the finished development of the site including existing retirement village units, the proposed Stage 1 development, the RACF and the proposed additional 46 retirement village villas.

In order to consider traffic impacts, Seca Solution collected current traffic data at the site access on Lodges Road during a typical afternoon peak period and reviewed the access and the operation of the road network in this location. Two-way traffic flow along Lodges Road in the vicinity of the site was in the order of 525 vehicles per hour. Based on peak traffic typically representing around 10% of the daily flows, this would indicate that the daily traffic flows on Lodges Road could be in the order of 5,250 vehicles in this location. Traffic flows on the side roads was found to be much lower, reflective of their residential nature. Peak hour flows on Sirius Circuit were less than 150 vehicles per hour in the afternoon peak period.

The provision of the link road between Sirius Circuit and Bowerman Road has been considered and found to be acceptable in terms of traffic movements and design. In this regard, traffic has been assessed for the masterplan for the site applying rates set by the Roads and Maritime Services (RMS) and includes the traffic generated by the future RACF. The additional trips associated with the masterplan development are considered to be within the capacity of Lodges Road and Liz Kernohan Drive whilst the peak hour flows on the Sirius Circuit and Bowerman Road will remain well below the environmental goal of 300 vehicles per hour in the afternoon peak period.

The parking provided is in excess of the SEPP requirements and is considered appropriate for the development.

Overall, the proposed development is considered acceptable in terms of traffic generation, access and parking.

6.2.7 Waste Management

A waste management plan (WMP) which addresses construction and operational waste management is provided at **Appendix 14** to this SEE.

Construction Waste Management

The WMP has assessed the likely volumes and types of waste streams that could be generated from the construction phases of the proposed works and ways in which the generation of waste to landfill can be minimised. The plan also makes recommendations with respect to maximising waste recycling and reuse.

Operational Waste Management

The operational waste management plan includes strategies to ensure waste streams are separated to promote recycling and minimise waste going to landfill.

Each dwelling has provision to store garbage bins within an area screened from the accessways and roads throughout the development. With the exception of dwellings 66 – 68, collection will occur from the road/accessway to which the dwellings have frontage. In this regard, all accessways have been designed to facilitate manoeuvring by a standard waste collection vehicle.

6 Environmental Planning Assessment

A hard stand area collection area will be provided for town houses 66 – 68 in the location indicated on the plans as the accessway servicing these dwellings is a dead end.

A storage area for bins provided for the community centre has also been provided and collection of bins from this facility will also occur from the internal road network.

6.2.8 Servicing

Water and Sewer

Advice has been received from Sydney Water (**Appendix 12**) that indicates water and sewer services are available to the site and proposed development is capable of being serviced.

Electrical

Part of the site is affected by an electricity easement.

Advice has been received from Endeavour Energy being the authority responsible for the easement and a copy of that advice is included at **Appendix 12** to this SEE. Endeavour Energy has advised that although there is not infrastructure within the easement it is still of strategic value. Discussions regarding the release of the easement are currently underway with the owner of the adjoining land, AV Jennings. If the easement is not extinguished, construction of townhouses 108, 109 and 110 will be delayed.

Webb Australia has liaised with the local electricity supply authority who has advised that the development will require a new padmount kiosk substation for the electricity supply. It is proposed to locate this substation on the link road, near pocket park 4. The indicative location of the substation is shown on the architectural plan set at **Appendix 3**.

6.2.9 Crime and Safety

The development has been designed having regard to the four key strategies of Crime Prevention Through Environmental Design (CPTED):

- Surveillance
- Territorial Re-enforcement
- Access Control
- Space/Activity Management

CPTED attempts to minimise the opportunity for crime by design that discourages anti-social and criminal behaviour.

Surveillance

The development includes dwellings which are orientated to street frontages with kitchens and front doors overlooking the footpaths and roadways of the internal streets providing natural surveillance. This contributes to activation of the street frontage and increases effective guardianship of the street.

Natural surveillance of the internal communal open space areas is considered to be high due to the location and orientation of dwellings and the fact that these spaces have frontages to accessways and roads.

Territorial Re-enforcement

This CPTED strategy relates to the community ownership of public space, by re-enforcing the ownership of territories for the site. In this regard, each lot will be fenced behind the 'building line' to define the area for each dwelling, however, it is proposed that the site as a whole will function as an open development

The common open space areas are expected to be well used by residents and their visitors. The use of common areas by residents and visitors provides consistent supervision of these areas which will reduce the opportunities for concealment and entrapment. The proposed

6 Environmental Planning Assessment

landscaping and fencing is considered to effectively promote territorial reinforcement with a clear delineation between private space, common space and public space.

Access Control

The development utilizes a series of tactical features such as pathways, fences, street lighting, signage and landscaping to clearly guide people and vehicles into and around the site. This will provide direction the flow of people while decreasing the opportunity for crime.

Space/Activity Management

This CPTED strategy relates to the use of spaces throughout a development to maintain natural community control of the surrounding areas, as places that are infrequently used are commonly abused. The proposed development has entries from surrounding streets which contribute to activation of the street frontages. The communal open space areas include open grassed area for play and seating which will contribute to the activation of the space. These areas will be managed and maintained by BaptistCare.

6.2.10 Acoustic Considerations

Acoustic Logic has undertaken an acoustic assessment (**Appendix 15**) to addresses potential noise impacts associated with:

- Traffic noise intrusion from residential dwellings in close proximity to Camden Bypass; and
- Mechanical plant in principle.

Noise impacts have been assessed against the requirements of:

- Camden Council Development Control Plan 2011;
- NSW State Environmental Planning Policy (SEPP Infrastructure) 2007.
- The Environment Protection Authority's Industrial Noise Policy.

The assessment concludes that the development is capable achieving the required standards subject to the implementation of acoustic treatments to ensure compliance with the external noise requirements of the ECRTN in some dwellings and installation of additional acoustic treatments to achieve the recommended internal noise levels of AS/NZS 2107 in some dwellings proximate to Camden Bypass.

6.2.11 Construction Management

A preliminary construction management plan (CMP) has been prepared by Lend Lease for the project. A copy of the preliminary CMP is included at **Appendix 17** to this SEE.

The CMP details the scope of works required to be undertaken and sets out a preliminary time frame for construction works.

The CMP also includes principles for construction traffic management. In this regard, the CMP indicates that:

- The loading and unloading of construction material from trucks, associated with the overall construction activity, will be carried out on-site.
- A safe, convenient and appropriate environment for pedestrians will be provided;
- Appropriate safety fencing around the perimeter of the site compound will be provided, with overhead protection where required;
- Construction vehicle movements to and from the site will be managed and controlled by qualified site personnel;
- Construction vehicles will be accommodated on-site;
- Construction vehicles only use designated routes;

6 Environmental Planning Assessment

- The arrival of trucks removing demolition and excavated material from the site will be co-ordinated and managed to avoid peak times.
- Construction vehicle routes to/from the site to the main road network through the area will be managed;

A separate construction traffic management plan (CTMP) has been prepared by Seca Solution. The CTMP concludes that:

- Staff associated with the removal of initial site waste will be minimal.
- There will be no public vehicles within the work site during the construction works, with a fence provided along the entire site boundary to restrict access.
- There will be no pedestrian access to the site for the general public. Existing pedestrian paths along Lodges Road will not be impacted upon by the project works.
- The truck numbers associated with the construction work is lower than the traffic movements associated with the approved development on the site and it is considered that the movement of vehicles in and out of the site for construction works can safely occur with minimal delays to pedestrians and in a safe manner. No limitation on truck access times is considered appropriate for the project.
- There is no requirement to divert traffic as part of this construction work.
- There will be minimal impact upon public transport services with no diversions required. There are no bus stops impacted by the proposal.
- There will be minimal impact for emergency vehicles, heavy vehicles, cyclists with no diversions required.
- There will be minimal impact upon the on-going development within the locality of the site.
- There will be minimal impact upon adjoining Council areas. Traffic routes in and out of the locality will be along the arterial road network which will experience minimal impacts due to the works.
- Due to the nature of the works and the movement of heavy vehicles at the start and finish of the earthworks portion of the project, consultation with the residents in the locality will be completed via a letter drop along properties in Sirius Circuit and Kingsman Avenue / Bowerman Road.

In relation to other environmental considerations associated with construction activities, the CMP includes protocols for the management of air quality and dust control, noise control and vibration minimisation, water quality and site drainage and safety for the general public. In this regard:

- Work associated with the construction activity will be carried out in accordance with the approved hours of construction.
- A 1.8m high fence will be erected around all public faces of the site to protect the public. The contractor will ensure that the fence is free of any graffiti by removing any graffiti and generally kept in good order.

6.2.12 Social Impact/Demand Assessment

Pursuant to Clause 46 of ARHSEPP, an assessment of the community need for the proposed group homes has been undertaken.

Available Services and Facilities

6 Environmental Planning Assessment

Table 5 is a summary of community services and facilities that are available in the vicinity of the site. These are the services that are likely to be required by future residents of the development, including the group homes.

Table 5 Location of Services and Facilities		
Criteria	Services	Location in relation to the site
Access to public transport	<p>Bus service. Route No. 895 provides services between Campbelltown Camden via the Narellan town centre</p> <p>Railway: Campbelltown railway station</p>	<p>Bus stop for Route No. 895 located on Lodges Road frontage of site</p> <p>11km</p>
Access to services – medical, retail, community support, entertainment, churches	<ul style="list-style-type: none"> Camden Hospital Campbelltown Hospital Medical centre in Narellan town centre Retail services in Narellan town centre: <ul style="list-style-type: none"> Supermarkets Hairdressers Pharmacies Specialty food Cafes/restaurants Newsagency Optometrists Banks Cinemas in Narellan town centre Community Support, e.g. Centrelink, Services NSW in Campbelltown regional centre Retail services in Campbelltown, including Macarthur Square Council office – Camden Council St Thomas Catholic Church Narellan Anglican Church Community building 	<ul style="list-style-type: none"> 6km by road 11km by road 1.5km by road 1.5km by road 1.5km by road 11km by road 11km by road 1.5km by road 1.5km by road 3km by road On site
Access to open space and recreational facilities	<p>Camden Golf Course</p> <p>Mt Annan Botanical Gardens</p> <p>Local Parks – Kirkham Park</p>	<p>Immediately north of the site across Lodges Road</p> <p>7km</p> <p>3km</p>
Access to employment centres	<p>Narellan town centre</p> <p>Smeaton Grange – industrial</p> <p>Western Sydney Employment Area (proposed)</p> <p>Campbelltown</p> <p>Sydney</p>	<p>1.5km</p> <p>5km</p> <p>23km</p> <p>11km</p> <p>66km</p>
The mix of existing development in the area	<ul style="list-style-type: none"> The Bicentennial residential estate. New residential subdivisions and housing associated with the development of the Elderslie release area. Land within the vicinity of the site is identified as being within the South West Growth Centre. The area is likely to experience significant growth in population over the next 15-20 years. 	<p>Immediately adjoining to the east</p> <p>Immediately adjoining to the west</p> <p>Approximately 6km to the north</p>
Availability of educational facilities	<ul style="list-style-type: none"> Narellan public school Narellan Vale public school Elderslie High School Elizabeth Macarthur HS Camden High School St Gregorys College, Gregory Hills St Clares Primary School 	<ul style="list-style-type: none"> 1.5km by road 3km by road 3km by road 2.4km by road 8.5km by road 9.5km by road 3.7km by road

6 Environmental Planning Assessment

Table 5 Location of Services and Facilities

Criteria	Services	Location in relation to the site
Availability of essential infrastructure (water, sewer, electricity, roads)	All essential services are available to the site but will need augmenting to provide sufficient capacity. The site is serviced by existing and proposed roads. New internal access roads will be required to be constructed.	
Development likely to impact on amenity	Camden bypass	Immediately adjacent to the site.

The above analysis demonstrates that the site is well located in relation to essential community facilities and services and is well serviced by public transport which provides ready access to a range of centres.

Policy Framework

The draft South West District Plan sets the strategic direction for development within the South West District of Sydney which includes the Camden local government area (LGA).

Chapter 4 – A Liveable City - of the draft District Plan provides an assessment of the characteristics of the future population of the South West District, including the types of housing the future population will require.

In this regard, the draft District Plan notes that:

...the proportional growth in the number of people over 85 is likely to be much higher than that expected for Greater Sydney

This suggests that there will be a demand for the seniors housing and future RACF.

The draft District Plan also notes that:

Average median household incomes are lower in the District than those across Greater Sydney, and there are significant spatial variations in socio-economic disadvantage. Our Liveability Profile shows that some neighbourhoods experience greater disadvantage, particularly in the Campbelltown and Liverpool local government areas.

And

The affordability of housing is an issue for people, with our community consultation finding that people in the South West District gave lower ratings to the availability of affordable housing to rent or buy and the overall cost of living.

This indicates that there will be a demand for the affordable housing which is proposed to be provided.

Chapter 4.2 of the draft District Plan outlines the liveability priorities and actions for the South West District and identifies the need to increase the provision of social housing as a mechanism to improve housing diversity and affordability.

Chapter 4.3 identifies that the Community Housing Sector will play a part in providing affordable rental housing.

6 Environmental Planning Assessment

The draft District Plan notes that the supply of different housing types, tenures and price points to meet the needs of different cultural, socio-economic and age groups must be delivered across Greater Sydney and the South West District. The range of housing choices that will need to be delivered is known as the housing continuum. Figure 4-6 of the draft District Plan demonstrates the housing continuum and the various entities who will be charged with the delivery of the various types of housing – **Figure 13**.

Figure 4-6: The housing continuum



Source: Greater Sydney Commission, 2016 adapted from City of Sydney Housing Issues Paper April 2015

Figure 13 Extract from draft South West District Plan – The Housing Continuum

Overall, the proposed development will contribute towards providing a variety of affordable housing types within an accessible location and therefore it is considered that the development supports the objectives of the draft District Plan.

Demographic Characteristics

Camden LGA is located within the South West Growth Centre. Two precincts within the South West Growth Centre which are within Camden LGA have been rezoned for urban development - the Oran Park and Turner Road precincts.

In addition to these precincts, Camden, in its role of assisting to meet the demand for Sydney's greenfield urban housing needs, identified other areas suitable to cater for new urban housing. Elderslie was one of these release areas.

Based on population forecast data available on Council's website:

- In 2016, there were 2,647 single parent households in the Camden LGA. This is forecast to increase by 5,439 households to 8,086 households in 2036.
- Of the 76,184 households in Camden in 2036, 10,601 or 13.9% of all households will be lone person households.
- In 2026, there will be 18,178 persons in the Camden LGA aged 60+. These 18,178 persons will represent 11.5% of the total 2026 population of the LGA.
- By 2036, there will be 10,821 persons aged 70 – 84 years and 2,042 persons aged 85+ in the Camden LGA.
- The population of Elderslie is proposed to grow by 2,560 persons between 2016 and 2036 to 6,967 persons.
- Within Elderslie, there is forecast to be 597 lone person households and 263 single parent households by 2036.
- The population forecasts for Elderslie on Council's website indicate that, by 2036, there will be:
 - 450 children aged 0-4 years
 - 689 children aged 5 – 11 years

6 Environmental Planning Assessment

- 621 children aged 12 – 17 years
- 1,695 persons aged 60+ years of age in Elderslie by 2036,

Persons within the service age groups identified above are the groups that will be targeted by BaptistCare for future residents of the proposed development.

Demographic Profile of Potential Residents

The overwhelming majority of housing proposed as part of the development will be dedicated to seniors (69%). This is a reflection of the changing demographics and demand in the Camden area and Elderslie locality.

The demographic analysis demonstrates that there will be an increasing population within the Elderslie locality generally but certainly within the Camden LGA with the LGA population set to increase by more than 168,000 persons over the next 20 years.

The draft South West District Plan identifies need for housing diversity in locations with good access to transport, health and community services, and more affordable housing. In this regard the proposed development will assist in the supply of 122 affordable dwellings for seniors and families.

Crime Statistics

Figure 14 is an extract from the Bureau of Crime Statistics and Research (BOSCAR) which indicates that within the Camden LGA there were 233 recorded incidents of domestic violence for the year to September 2015. This equated to 347.3 incidents per 100,000 persons. This had reduced to 211 incidents in the year to September 2016 (or 314.5 incidents per 100,000 persons).

Whilst these statistics suggest that the incidence of domestic violence in the Camden LGA might be reducing, there were still 211 incidents recorded last year which indicates a potential need to address the needs of the victims of domestic violence.

NSW Crime Statistics for Oct 2014 to Sep 2016: Incidents of Assault (Domestic assault)

Search this table:

	To Sep 2016	Year to Sep 2015		Year to Sep 2016	
LGA	Trend: 2 year	Count	Rate	Count	Rate
New South Wales	up 0.7% per year	29055	386.4	29244	389.0
CAMDEN	stable	233	347.3	211	314.5

Figure 14 Extract from BOSCAR crime mapping statistics website

Conclusion

The proposed development will have the following positive social impacts:

- The development proposal will provide 84 new seniors housing dwellings and 38 affordable dwellings for families.
- The site is well serviced by public transport which provides convenient and safe access to a range of services and facilities likely to be required by future residents.
- The proposal provides a good level of casual surveillance within the development.
- The proposal provides substantial landscaping within and around the perimeter of the site.
- BaptistCare has identified its site at Narellan as an appropriate location to provide housing for seniors and affordable housing for families.

6 Environmental Planning Assessment

- The population of the region is increasing and ageing.
- The proposed development is an appropriate response to the draft South West District Plan which states, in the liveability priorities in Chapter 4.2 which champions the delivery affordable rental housing and support for social housing by increasing the provision of social housing.

In this regard, the draft District Plan makes the following comments in relation to affordable housing:

Affordability: *building on the direction in A Plan for Growing Sydney by setting a target for the provision of affordable rental housing in new urban renewal and land release areas for the low and very low income households that are the most vulnerable. This also relates to supporting a supply of diverse housing types in the private market that are more affordable to key workers and moderate income households*

- The development will assist in addressing the needs of socially disadvantaged families
- The development has been sensitively and deliberately designed having regard to the surrounding low density residential uses, the existing seniors housing facilities on the site, and the seemingly disparate cohorts of seniors and families. It is considered that the design of the development results in an appropriate social outcome for future and existing residents.

6.2.13 Economic Impact

The proposed development will have several positive economic benefits:

- The development will make use of public transport facilities available in the area.
- The proposal will have positive economic impacts including construction related jobs.
- The additional population will provide demand for shops and services that will be located within the area including the Narellan shopping centre and Campbelltown town centre.
- The site is currently underdeveloped.
- The housing to be provided will be made available to those with limited income and reduced capacity to earn.

6 Environmental Planning Assessment

6.3 Section 94 considerations and SIC

6.3.1 Section 94/94A Contributions

The site is within the area subject to Camden Contributions Plan 2011 (Camden CP 2011). The southern, undeveloped section of the site is within Elderslie Contributions Precinct – see **Figure 15**.

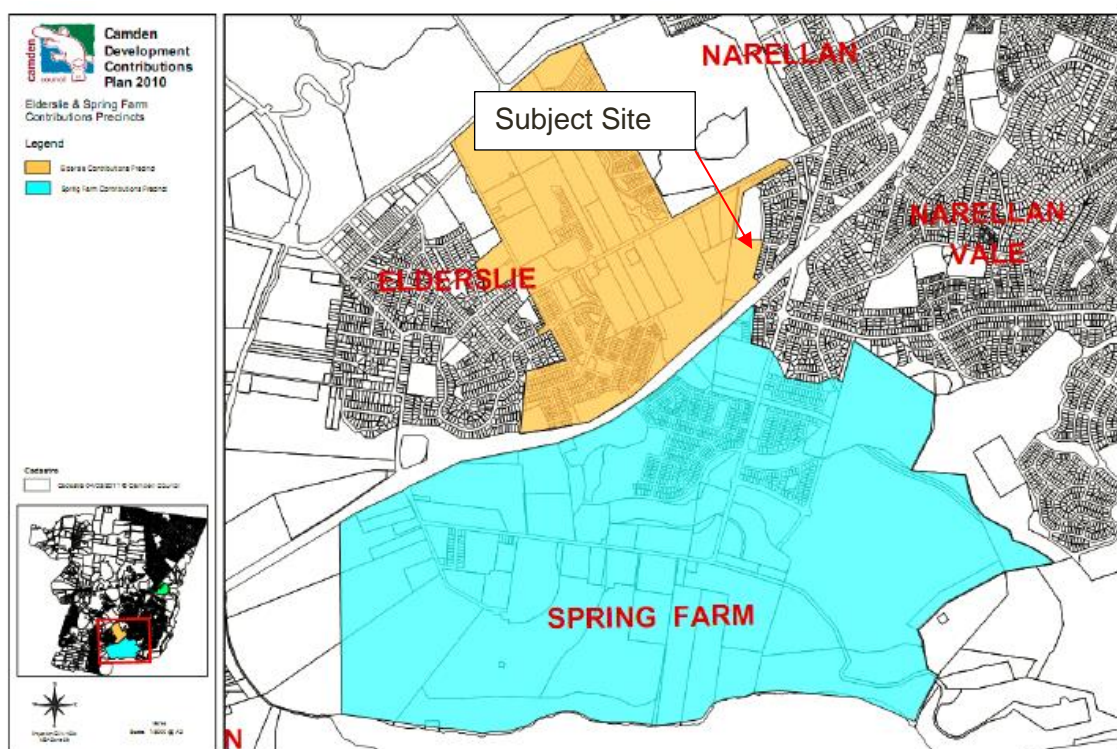


Figure 15 Extract from Camden Contributions Plan 2011 (Figure 2.2 Elderslie and Spring Farm Contributions Precinct)

As a social housing provider, a seniors housing development undertaken by BaptistCare **is not** be subject to section 94 contributions in accordance with the Section 94E Direction dated 14 September 2007.

Further, development for the sole purpose of affordable housing is exempt from the operation of Camden CP 2011 as noted in Section 2.8.1 of that plan. Therefore, there are no s94 contributions payable in relation to the proposed Stage 1 development.

6.3.2 Special Infrastructure Contribution (SIC)

As the site is within the Elderslie release area, it is within the area subject to the *Environmental Planning and Assessment (Special Infrastructure Contribution) – Western Sydney Growth Areas) Determination 2011* (SIC).

The provisions of the Determination are such that residential developments (including seniors housing and affordable housing) within identified areas are levied an additional contribution, a SIC, on top of the Council levied Section 94 contribution (if applicable). There is no dispensation in the Determination for social housing providers to be exempt from payment of the SIC.

6 Environmental Planning Assessment

6.4 Suitability of the Site for Development

The site is considered to be well located for the proposed development and likely future residents because:

- It is proximate to good public transport facilities which provide regular services to shopping centre and other transport modes and employment areas.
- The areas serviced by the buses provide a variety of community facilities and services likely to be required by future residents.
- There are parks, schools and other community based organisations accessible to the site by public transport or walking.
- The development is co-located with existing seniors housing facilities and a residential care facility is proposed which will allow for aging in place for the future senior residents.
- The arrangement of buildings on the site provides for good separation and ample landscaping opportunities
- The site has ready access to all essential services
- The site is within an area undergoing change from a rural area to an urban character. The design of the development is in keeping with the emerging character of the area.
- The development has been designed to maximise privacy for adjoining residents and future residents of the development, whilst maintaining district views to the west.
- The development has been designed as an accessible facility.
- The development is an appropriate response to the current and future demographic profile of the area and will provide 122 affordable housing dwellings for seniors and social disadvantaged families.

6.5 Public Interest

In accordance with Section 79C(1)(e) of the EP&A Act, it is in the public interest to allow the site to be developed as it is consistent with BaptistCare's strategic planning for the site.

The proposed development will provide housing for seniors and affordable housing for families.

The proposed buildings are well designed and will provide an interesting built form within a landscaped setting in the streetscape. The dwellings are provided with a good level of amenity in terms of solar access, cross ventilation, privacy and private open space and the communal open space areas will provide good opportunities for passive recreation.

The development is compatible with the existing character of the area and will not result in any adverse impacts in terms of overshadowing or loss of privacy.

Future residents of the development will be required to adhere to BaptistCare's tenancy conditions.

7 Conclusion

This staged development application and concurrent Stage 1 application seeks consent for the construction of a seniors affordable housing development in the site. The Stage 1 development will comprise of 122 residential dwellings comprising 84 seniors housing dwellings and 38 affordable dwellings for families, roads and site infrastructure and landscape works and subdivision of the site into five community title lots.

This SEE has described the site, surrounding development and provided a detailed description of the proposed development. The environmental assessment of the proposal against the relevant provisions of Section 79C(1) of the EP&A Act has been undertaken. The assessment indicated that the proposed development generally complies with the provisions of the relevant EPIs, draft EPIs and DCP.

It is considered that the proposed development is well designed and will make a positive contribution to the Elderslie area and will complement the existing development on the site and in the surrounding area.

The siting and location of the buildings provides significant landscaping opportunities for deep soil landscaping and communal open space areas which are easily accessible by all future residents.

The proposed development will contribute positively to the Narellan/Elderslie community and will present an appropriate urban form in the area. Accordingly, the proposal is considered to satisfactorily respond to the opportunities and constraints of the site and is consistent with the character of the area.

The Stormwater Management Strategy has been prepared for the site and includes rainwater tanks and on-site detention tanks to ensure the development meets the water objectives of the Camden DCP.

The proposed development will not result in unreasonable impacts on adjoining properties, both future and existing, and will not have any negative environmental impacts. The site can be serviced by the required infrastructure and services, which will be augmented to service the development.

There are no Section 94 contributions applicable to this site or the proposed development.

The proposal is development under Schedule 4A EP&A Act 1997, being community facilities for the purposes of affordable housing and group homes with a capital investment value of greater than \$5 million and therefore the application will be referred to the Sydney South West Planning Panel for determination.

In view of the above, the proposed development is therefore recommended for approval to the Planning Panel and Council subject to appropriate conditions of consent.