

Mr Marlon Zunac
CYRE Projects Pty Ltd
Suite 18/100 Walker St
NORTH SYDNEY NSW 2060

15 March, 2017

Dear Mr Zunac,

**RE: Social Impact Comment – Catholic Healthcare’s Residential Aged Care Facility
Casula**

Under Section 7.1.3 of Liverpool Council’s Social Impact Assessment Policy, a Social Impact Comment is required for residential development applications for housing for seniors or people with a disability, within the meaning of the SEPP (Housing for Seniors or People with a Disability) 2004. Under the SEPP:

seniors housing is residential accommodation that is, or is intended to be, used permanently for seniors or people with a disability consisting of:

- (a) a residential care facility, or*
- (b) a hostel, or*
- (c) a group of self-contained dwellings, or*
- (d) a combination of these,*

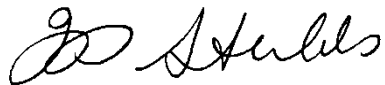
but does not include a hospital.

Note. The concept of seniors housing is intended to be a shorthand phrase encompassing both housing for seniors and for people with a disability.

The Social Impact Comment is to be completed by a suitably trained professional. In this regard, I have over thirty years' experience in Social Impact Assessment and have previously prepared Social Impact Assessments and Comments for submission to Liverpool City Council. I have been accepted as an expert witness in the Land and Environment Court with regard to social impacts for over 20 years.

The completed Social Impact Comment Initial Assessment Form is attached.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Dr Judith Stubbs'.

Dr Judith Stubbs

Principal

APPENDIX A – SOCIAL IMPACT COMMENT INITIAL ASSESSMENT FORM

SOCIAL IMPACT COMMENT INITIAL ASSESSMENT FORM			
Applicant's details:		Owner's details (if different to applicant):	
Name		Name	
Catholic Healthcare Limited		Catholic Healthcare Limited	
Postal address		Postal address	
Suite 1, Level 5, 15 Talavera Road, Macquarie Park NSW 2113		Suite 1, Level 5, 15 Talavera Road, Macquarie Park NSW 2113	
Email		Email	
afahey@chcs.com.au		afahey@chcs.com.au	
Phone	Mobile	Phone	Mobile
8876 2142		8876 2142	
Proposal details:			
Lot number & Registered plan number			
Lots 1 & 5-7 DP28819, Lots 139-141 DP26304, Lots 2-4 DP28819 and Lot 1 DP577831			
Site address			
11, 13 & 15 Lang Road Casula; 76, 78 & 80 Marsh Parade Casula; and 536,538,540 & 542 Hume Highway Casula			
Brief description of development proposal			
The proposal is for the construction of a 144 bed two storey residential aged care facility with basement parking, reception and administration area.			

1. Population change	
<p>Will the development result in significant change/s to the local area's population (either permanently and/or temporarily)?</p> <p><i>Explanation: Changes to the size, structure and capacity of the population can have significant implications for the provision and adequacy of community facilities, services, community cohesion and/or social sustainability</i></p>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Impacts</p> <p>At the 2011 Census, on average there were 3.0 people per separate house in Casula Suburb. The development will result in the loss of ten separate houses and the addition of a 144 bed residential aged care facility, with a net estimated population gain in Casula Suburb of 114 people. In 2011 the population of Casula suburb was 14,696, so the additional population is a 0.8% increase.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>The additional population will require a pro-rata increase in services although this is relatively minor. Services and facilities will be provided on site including residential aged care, café and hair saloon, chapel and multifunction activity room, exercise and physiotherapy services, community care and healthcare services, meals and room servicing. Outdoor space will be provided as part of the development. The provision of services within the new facility will be a public benefit to the extent that residents in the locality, who are currently users of community based services, enter the facility.</p>
2. Housing	
<p>Will the proposal increase or reduce the quantity, quality, mix, accessibility and/or affordability of housing?</p> <p><i>Explanation: A mix of housing types, sizes and costs is necessary for social diversity (in terms of age, family life cycles, income, cultural background) and social inclusiveness. Retention or expansion of affordable housing is necessary for social equity and to avoid displacement of individuals and families on lower incomes</i></p>	

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If yes, briefly describe the impacts below</p> <p>Quantity</p> <p>The proposal will decrease the number of separate dwellings in Casula Suburb by 10 dwellings and provide an additional 144 residential accommodation beds for seniors, including 40 dementia care beds and 104 residential main stream care beds.</p> <p>Quality</p> <p>The quality of housing will be improved to the extent that the facility will be newly constructed and will be purpose built to cater to the needs of seniors. In contrast the existing 10 houses appear to be around 50 years old consisting of a mix of weatherboard, fibro cement and brick veneer and in varying states of repair, are unlikely to be accessible for older people without modification and are unlikely to be suitable for those seeking smaller more manageable dwellings.</p> <p>Mix</p> <p>The mix of housing will be improved, particularly in the context of wider trends including ageing of the population, and the commensurate demand for residential aged care accommodation. The Aged Care Approval Round (ACAR) is an annual competitive assessment process for releasing and allocating aged care places to approved aged care providers. The number of places released is governed by the Commonwealth's population-based aged care service provision target ratio.ⁱ</p> <p>The residential aged care target ratio is reducing from 88 to 78 places per 1,000 people aged 70 and over, with that target to be achieved by 2021-22.ⁱⁱ As at June 2016, there were 77.5 residential care places in south west Sydney, less than the target of 78 places for 2021-22.ⁱⁱⁱ The provision of aged care places is closely targeted, with the 2016-17 Aged Care Approvals Round Essential Guide identifying target locations at the SA3 level.^{iv} The adjacent Fairfield and Campbelltown LGAs were identified as targets in the <i>2016-17 Aged Care Approvals Round Essential Guide</i>.^v</p> <p>The SA3 of Liverpool is currently classified as an ACAR Category 2 – High Need, with the SA2 subgroup of Casula forecast to have a shortfall of 655 places in 2021 and 2,276 places in 2026. A gap of 1,135 beds is forecast in the Liverpool LGA by 2026.^{vi}</p> <p>Accordingly, it can be concluded that the approval of the aged care places will assist in meeting the demand for such accommodation in the locality.</p> <p>Accessibility</p> <p>The proposed building will be been designed to comply with the relevant access provisions of the Building Code of Australia 2017 and provide easy access and useable areas in accordance with the Disability Discrimination Act.</p> <p>The bedrooms are provided across two levels (Levels 1 and Levels 2), with the basement level containing room for administration, kitchen, utility, staff rooms, administration and other communal spaces. A lift connects the floors.</p> <p>Two accessible car spaces will be provided in close proximity to basement parking entrance.</p>
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	<p>Affordability</p> <p>Payment for residential aged care services consists of three charges:</p> <ul style="list-style-type: none"> • a basic daily fee set at 85% of the single aged care pension and payable by all residents;^{vii} • an accommodation payment payable either by lump sum, daily payments or a combination of both. This payment is supported by the Federal Government,^{viii} based on a means test. People with income of less than \$24,731.20 per week and assets of less than \$45,000 receive a full subsidy, while those with assets of greater than \$154,179.20 or income of \$62,943.92, (or combination) receive no subsidy.^{ix} When the payment is by lump sum it is refundable subject to agree deductions. Where it is a daily payment, it is similar to a rental payment; and • a means tested care fee, which is an additional fee payable by those above the asset or income thresholds. <p>All aged care services, whether or not they are certified, are required to meet the supported resident ratio - formerly known as the concessional resident ratio - which applies to their region. Sanctions may be applied to those services that do not meet the required ratio. Exceptions to the requirement are homes that provide only extra service or the distinct part of a home that provides extra service. Supported, concessional and assisted residents count towards the supported resident ratio.^x</p> <p>The minimum supported ratio for South West Sydney is 26.7%,^{xi} meaning that as a minimum 39 beds (assuming no extra service beds are provided) will be available as supported accommodation. Catholic Healthcare Limited would generally cater for a higher proportion of supported residents.</p> <p>Hence the development will provide affordable accommodation (based on the means test) to a minimum of 39 low income and/or asset poor people. For those people above the asset or income threshold, a typical accommodation payment in a similar nearby development is \$70 per day, or \$490 per week.^{xii} This payment is within the affordable rental range for a moderate income household of \$380-\$560 per week.</p> <p>Due to the government subsidy to those with limited incomes and assets, the development is generally expected to provide affordable accommodation to very low, low and moderate income single person households.</p> <p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>Overall, the development will make a positive contribution in the areas of housing supply, quality, mix, accessibility and affordability. Importantly, the development enables older people with higher support needs to age in place within their community to the extent that residents of the facility come from those living in the locality. The availability of subsidised places means that lower income people seeking residential care will not be displaced from the locality. We are advised that 40 concessional beds will be offered. No further mitigations are proposed.</p>
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3. Accessibility	
<p>Will the development improve or reduce physical access to and from places, spaces and transport?</p> <p><i>Explanation: 'Access for all' is an essential component of a fair and equitable society. Accessible developments encourage inclusive communities, improve affordability of goods and services, maximise access to public transport, pedestrian and cycle networks and provide convenient and continuous paths of travel (thereby promoting healthy, sustainable lifestyles).</i></p> <p><i>Consideration must also be given to accessibility for people with a disability. Refer to Council's Disability Strategy 2012-2017 available for download from Council's website</i></p>	
<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>(but constrained for less mobile or frail people)</p>	<p>If yes, briefly describe the impacts below</p> <p>The proposed development is adjacent to a high frequency bus service operating along the Hume Highway providing access to extensive services in Liverpool CBD on routes 870, 871, 872, 855, 856 and 857. A bus service is typically available six times an hour on weekdays and Saturdays, and three times an hour on Sundays. Services operate between 6.00 am and 10.00 pm. Access to the southbound bus stop (buses coming from Liverpool) is good, with the bus stop located 100 metres along a concrete footpath from the proposed pedestrian entry to the complex. Access to the northbound bus stop (buses to Liverpool) is problematic, with the nearest bus stop 200 metres away, but across six lanes of the Hume Highway (noting the availability of a wide grassed median to assist in crossing). The nearest northbound bus stop accessible using a signalised crossing of the Hume Highway is 530 metres to the north outside Casula Shopping Centre, near the intersection with Ashcroft Avenue. By comparison, SEPP (Housing for Seniors and People with a Disability) 2004 adopts an access criteria of 400 metres to the nearest bus stop along a suitable access path.</p> <p>Casula Railway Station is 750 metres from the proposed development by foot. Access to the station is quite steep, with the pedestrian path from Canberra Avenue to the station containing 95 steps.</p> <p>Access to the regional road network is available on the adjacent Hume Highway.</p> <p>Shops and facilities are available on:</p> <ul style="list-style-type: none"> • Marsh Road, 200 metres by concrete footpath with shops including a hairdresser, day spa and butcher; • Hume Highway near Casula Road, 340 metres by concrete footpath with shops including a newsagent and cheesecake shop; • Casula Shopping Centre near De Meyrick Avenue, 450 metres by concrete footpath and signalised pedestrian crossing of the Hume Highway with shops including fruit market, fish market, mixed business, take away food, food market, butcher, baker, newsagent and chemist. <p>While there are extensive parklands and bushland along Glenfield Creek and Georges River, pedestrian access is problematic due to distance and steepness, being similar to the access to Casula Railway Station described above.</p> <p>The development will provide a range of onsite services as listed previously. Outdoor space will be provided as part of the development.</p> <p>The impacts of poor physical accessibility to public transport would be less relevant if the residents of the aged care facility are not ambulatory or are significantly disabled.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>No mitigation is proposed.</p>

4. Community and Recreation Services / Facilities	
<p>Will the development increase, decrease or change the demand or need for community, cultural and recreation services and facilities?</p> <p><i>Explanation: Access to diverse and adequate community and recreation services and facilities is necessary for physical and mental health, well-being, personal productivity, social cohesion and social sustainability. Examples of facilities include community centres, leisure centres, recreation centres, sports fields and playgrounds</i></p>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If yes, briefly describe the impacts below</p> <p>The proposal is estimated to increase the population of Casula by 114 people, thereby increasing the demand on community and recreation services and facilities. Residents are likely to have limited mobility and so will generally rely on services provided on site. The additional population will require a small pro-rata increase in services and facilities in the locality.</p> <p>There will be an increase in services and facilities in the locality as the development will provide a range of services including residential aged care, café and hair saloon, chapel and multifunction activity room, exercise and physiotherapy services, community care and healthcare services, meals and room servicing. Outdoor space will be provided as part of the development.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>Additional services will be provided within the facility. The provision of services within the new facility will be a public benefit to the extent that residents in the locality, who are currently users of community based services, enter the facility.</p>
5. Cultural and Community Significance	
<p>Will the development impact on any items or places of cultural or community significance?</p> <p><i>Explanation: There may be certain places, items or qualities that are culturally valuable or significant to the community. They provide significant meanings and reference points for individuals and groups. This may include specific sites of Aboriginal significance. The acknowledgement and protection of these places, items or qualities is a key element in building strong and resilient communities. For information about Liverpool's cultural and linguistically diverse communities, refer to Council's LEAPS Multicultural Plan available for download from Council's website</i></p>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>No items or places of cultural significance have been identified on the site.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>None proposed.</p>

6. Community Identity and Sense of Belonging	
<p>Will the development strengthen or threaten opportunities social cohesion and integration within and between communities?</p> <p><i>Explanation: Social cohesion and integration requires places and spaces for informal and safe social interaction. Developments can increase or decrease these interaction opportunities through their provision (or otherwise) of safe and connected pathways and linkages and attractive gathering places (town centres, parks, squares / plazas, civic spaces and streets)</i></p> <p><i>Consideration should be given to incorporating principles of good urban design into the development proposal. Refer to the Creating Places for People: An Urban Design Protocol for Australian Cities, available for download from the Federal government's Urban Design website</i></p>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The development does not impact on places and spaces for informal and safe social interaction and does not impact on pathways and linkages. The surrounding area currently consists of low density separate housing however the R3 zoning and evidence of redevelopment of lots suggests that the character of the area is in transition and so the development is expected to be integrated with the future character of the area. Opportunities for social interaction are available through common rooms and outdoor space within the development. Opportunities are also available for more ambulatory residents to walk to local shops.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>No mitigation is proposed.</p>
7. Health and Well-being	
<p>Will the development strengthen or threaten opportunities for healthy lifestyles, healthy pursuits, physical activity and other forms of leisure activity</p> <p><i>Explanation: Developments can increase or decrease opportunities for healthy lifestyles through improving or reducing the liveability of places (due to things such as safety, noise, dust, aesthetics) or increasing or decreasing opportunities for:</i></p> <ul style="list-style-type: none"> • Walking, cycling, play and other physical activity • Healthy food choices • Drinking, gambling and smoking <p><i>Consideration should be given to incorporating healthy urban design principles into the development proposal. Refer to the Healthy Urban Development Checklist, available for download from the NSW Health website</i></p>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The development provides the opportunity to walk to local services and facilities as listed previously. More able residents could walk to public transport and shops; however pedestrian routes may be problematic for frail or less able people. Pathways within the development will be accessible and open space will be available providing opportunities for physical activity.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>No mitigation is proposed.</p>

8. Crime and Safety

Will the development increase or reduce public safety and opportunities for crime (perceived or actual crime)?

Explanation: Developments can increase or decrease perceived and actual safety. For example, through generating increased traffic, providing venues that may attract unruly behaviour. This can diminish social cohesion and integration however impacts can be mitigated by appropriate design, traffic controls and management.

Safer by Design principles should be considered in the development proposal. Refer to Council's Community Safety and Crime Prevention Strategy available for download on Council's website. The Crime Prevention Through Environmental Design (CPTED) Guidelines are available for download on the [NSW Police website](#)

☐ Yes

The design has been reviewed with regard to CPTED principles.

☒ No

Surveillance

A reception desk is provided overlooking the main entrance to the building. Security Cameras will be provide to the front entrance and access points to the building with 24 hour security surveillance. The facility will be staffed at all times, providing additional surveillance. Outdoor open space is overlooked by residential units, and the complex itself is sited on a major road, with high volumes of passing traffic.

Access Control

Secure fencing will be provided to outdoor space, and access from dwellings to the outdoor space will be available. Roller doors are shown to parking areas.

Territorial Reinforcement

A boundary fence will be provided to the perimeter of the site.

Space Management/Maintenance

The operator will have a program in place to manage and maintain space.

A review of **BOCSAR crime maps** shows medium intensity hotspots for the following crimes in the area:

- Break and Enter Dwelling

A review of BOCSAR crime maps shows low intensity hotspots for the following crimes in the area:

- Domestic Violence
- Motor Vehicle Theft
- Steal from Motor Vehicle

Typically the area is on the edge of larger hotspots for these crimes, and crime is not expected to be problematic with regard to the type of facility and proposed target group.

Describe your proposed mitigations of negative impacts or enhancements of positive impacts below

Consider opportunities to provide security access to the complex, such as secure perimeter fencing to the outdoor open space and security access to the building and to the underground parking areas.

9. Local Economy and Employment Opportunities	
<p>Will the development increase or reduce the quantity and/or diversity of local employment opportunities (temporary or permanent)?</p> <p>Explanation: <i>Unemployment and low income are associated with poor health and reduced social inclusiveness and resilience. Accessible and diverse local jobs (suited to the capacities of local populations) reduce the risk of unemployment (and the associated poorer health and social sustainability outcomes)</i></p>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If yes, briefly describe the impacts below</p> <p>There will be employment associated with the construction of the dwellings. The quantum of employment has not been estimated.</p> <p>The operation of the aged care facility is expected to employ up to 41 Full Time Equivalent workers including administrative and care staff. Contractors will also provide cleaning services and landscape maintenance services. Many of these jobs will provide employment opportunities for lower skilled people. This is a significant benefit of the proposal.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>No mitigation is proposed.</p>

10. Needs of Specific Population Groups	
<p>Will the development increase or decrease inclusive opportunities (social, cultural, recreational, employment, governance) for groups in the community with special needs?</p> <p>Explanation: <i>Council has a Social Justice Policy, which promotes access to life opportunities (e.g. jobs, education, full participation in the cultural life of the community) and inclusiveness for all (including those with special needs – young people, aged population, CALD communities, Aboriginal community, people with a disability, children and women). Developments can increase inclusiveness through the provision of culturally appropriate facility design and programs, and the avoidance of communication barriers.</i></p> <p><i>Refer to Council's Community Strategic Plan, Growing Liverpool 2023, Social Justice Policy, LEAPS Multicultural Plan, Youth Strategy and Disability Strategy available for download on Council's website.</i></p>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If yes, briefly describe the impacts below</p> <p>The development will provide supported accommodation to seniors including those with dementia. Due to the availability of means tested government subsidies, it is unlikely that anybody will be excluded from the development, subject to available capacity. The proposal is a significant benefit in this regard.</p>
	<p>Describe your proposed mitigations of negative impacts or enhancements of positive impacts below</p> <p>None proposed.</p>

ⁱ Australian Government Aged Care Financing Authority (2016) *Fourth Report on the Funding and Financing of the Aged Care Sector*, Glossary p. i.

ⁱⁱ *Ibid*, pages vii and xxiv.

ⁱⁱⁱ https://agedcare.health.gov.au/sites/g/files/net1426/f/documents/09_2016/op_places_ratios_by_acpr.pdf accessed 6 March 2017.

^{iv} Australian Government Department of Health *2016-17 Aged Care Approvals Round Essential Guide*, page 62.

^v *Ibid*, page 62.

^{vi} Catholic Healthcare Limited (2016) *ACAR submission for Casula*.

^{vii} <http://www.myagedcare.gov.au/costs/aged-care-homes-costs-explained> accessed 9 March 2017.

^{viii} <http://www.myagedcare.gov.au/aged-care-homes-costs-explained/accommodation-payments> accessed 9 March 2017.

^{ix} Department of Social Services (2014) *Information Booklet on Fees for Home Care Packages and Residential Aged Care for People entering care from 1 July 2014*, all rates as at May 2014.

^x <https://agedcare.health.gov.au/tools-and-resources/ageing-and-aged-care-research-and-statistics/residential-care/supported-resident-ratios> accessed 9 March 2017.

^{xi} *Ibid*.

^{xii} <http://www.catholichealthcare.com.au/en/residence/emmaus-village/> accessed 22 March 2017, room rate calculator for standard room with no deposit, rate is \$67.86 per day.