

# SITE COMPATIBILITY CERTIFICATE APPLICATION

Proposed Extension to Existing Seniors Housing

9 Old Glenhaven Road, Glenhaven (Lot 100 DP1230439)

For – CCR Interiors Pty Ltd

*30 October 2017*

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## SECTION 1 - EXECUTIVE SUMMARY

### SITE DETAILS

Address	9 Old Glenhaven Road, Glenhaven, NSW, 2156
Lot and Plan	100 DP1230439
Subject Area	52,610sqm (5.261 hectares)
Local Authority	The Hills Shire Council
Current use	Existing dwelling and associated outbuildings

### LOCAL PLAN – THE HILLS LOCAL ENVIRONMENTAL PLAN (LEP) 2012

Zoning	Rural – RU6 Transition
Overlays	Biodiversity Bushfire

### APPLICATION DETAILS

Application Type	Site Compatibility Certificate for an extension to an Existing Seniors Housing
Proposed Dwellings	Maximum of 140 dwellings

### APPLICANT DETAILS

Applicant	CCR Interiors Pty Ltd
Town Planner	Innovative Planning Solutions

## SECTION 2 – APPLICATION DETAILS

### Background

1. This report has been prepared on behalf of CCR Interiors Pty Ltd in relation to an application to the NSW Department of Planning & Environment (DP&E) for a Site Compatibility Certificate (SCC) as required by the provisions of clause 25 of the *State Environmental Planning Policy (Housing for Seniors or People with Disability) 2004* (SEPP Seniors).
2. The subject land is located at 9 Old Glenhaven Road, Glenhaven and has an area of 5.2610 hectares (refer to Survey Plan at **Attachment 1**). The land has frontage to both Old Glenhaven Road and Edgecliff Road and is adjacent to the existing Living Choice Glenhaven Retirement Community. The Services Context Plan included at **Attachment 2** shows the site and surrounding context which includes other retirement village / aged care activities, local bus stops and a local centre within short walking distance of the subject site. The site is located in an area that accommodates a range of urban services and activities and is in a state of transition away from rural residential activities.
3. The adjacent Glenhaven retirement village is a successful facility experiencing a high demand for retirement dwellings. A letter provided by Living Choice Australia (the proposed operator) at **Attachment 9** provides a brief summary of the current statistics for their existing Glenhaven retirement facility identifying the overwhelming demand for retirement dwellings being experienced. This correspondence identifies that Living Choice Glenhaven currently have a waitlist of 147 people for dwellings within the existing facility. This correspondence also identifies an occupancy rate of 98% with properties typically re-leased within 90 days of refurbishment occurring and also an extensive list of people who have expressed interest in the facility. This information coupled with the broader demographic trends for the region showing an increased demand for retirement and aged care options over the next 20 years which are compelling factors to demonstrate that the need for retirement living uses in the surrounding area is strong.
4. The subject land is currently zoned Rural (RU6 Transition) under The Hills Local Environmental Plan (LEP) 2012. The proposal seeks a Site Compatibility Certificate 'SCC' to permit the land to be used for Seniors Housing (for up to 140 dwellings). The purpose of this report is to detail the site features, land use context, constraints and provide an assessment of the proposal against the SCC assessment criteria outlined in section 25 of the SEPP for Seniors Housing.
5. This report seeks an SCC approval to accommodate up to 140 retirement living dwellings on the subject land. Development Concept Plans for the proposed aged care extension have been prepared and are included at **Attachment 1**. These plans demonstrate the following key concepts:

- a) 45% of the land is provided as environmental or landscape areas;
- b) Landscaped setbacks are provided to rural transition land in the surrounding area;
- c) Up to 140 dwellings are delivered on a footprint of approximately 55% of the land area; and
- d) Access for all new dwellings is via the internal retirement village roads (with no direct road access to surrounding streets).

The specifics of the development concept are discussed in further detail in Section 4 of this report.

## Consultation

6. In investigating the proposed extension, the applicant has held a pre-lodgement meeting with the Hills Shire Council. The Hills Shire Council have indicated they are willing to consider an expansion to the existing village provided relevant technical matters can be appropriately addressed. Specific matters to be addressed include – environmental, bushfire, engineering, landscaping, environmental health and planning. The Hills Shire Council pre-lodgement meeting minutes are included at **Attachment 5** to this report for the Department's reference.

## The Proponents

7. This application is made on behalf of CCR Interiors Pty Ltd who are the applicant and registered owners of the land however it is intended that Living Choice Australia will be the operators of the extended facility as an operational continuation of the existing facility on adjoining land. Living Choice is a welcoming organisation providing aged care and retirement accommodation within pleasing and stimulating living environments that offer rewarding and fulfilling lifestyles for the senior community. The Living Choice Mission Statement is one that values providing superior housing and an excellent care programme by:
  - *Designing and building quality lifestyle environments in superior locations*
  - *Offering choices in design and services*
  - *Providing the best care and support to residents*
  - *Ensuring the operation and management of the villages exceeds the quality set by the industry*
  - *Promoting residents' individuality and right to choice*
8. Living Choice Australia values dignity, respect, choice and opportunity. As an organisation, Living Choice Australia provides high quality care and support to more than 2,065 residents in retirement homes across three States.
9. Living Choice Australia operates and manages its own villages and has a policy of dealing directly with residents, with open lines of communication between resident committees, village managers,

operations managers and the Managing Director. This has resulted in a positive relationship with residents and a spirit of co-operation.

10. Within New South Wales there are 5 retirement villages, including Living Choice Glenhaven Retirement community. Glenhaven is Living Choice's fastest growing village and takes full advantage of its location, offering luxury living set in a rural environment yet which also has easy access to extensive shopping facilities and a scheduled bus service that stops at the entrance to the village.
11. There is currently an extensive wait list for the existing Glenhaven village, with more than 70 people waiting for dwellings to become available. As such, this SCC application is the first step in seeking to accommodate the current shortfall in retirement accommodation in the area.



## SECTION 3 – LOCALITY AND SITE ANALYSIS

### Site Context

12. The subject land currently accommodates some dwellings and associated infrastructure which would be removed to accommodate the extension to the retirement village (Refer to the Aerial Plan provided at **Attachment 1**). The site is an L-shaped parcel of land located within a varied land use setting and adjacent to the existing Living Choice Glenhaven Retirement Community.
13. The surrounding area is clearly in transition away from rural activities and is emerging as a retirement and aged care activity hub with the immediate area currently accommodating 2 retirement villages and 2 aged care facilities within an 800m distance. The Services Context Plan included at **Attachment 2** shows the context of the subject site including the following uses that directly adjoin the subject site:

Direction	Land use
North	Large dwellings on RU6 zoned land
East	Large dwellings on RU6 zoned land
South	Conventional low density residential development
West	Existing retirement village and aged care facility

### Physical Features

14. The site has immediate frontages to Old Glenhaven Road and Edgecliff Road. The site typically falls to the north-east towards Dooral Dooral Creek. Currently single residential dwellings and associated infrastructure are located on the subject site which are generally located towards the respective road frontages. Such structures would be removed to accommodate the proposal.

### Access to Services

15. The subject land is located in close proximity to the full range of urban services including doctors, shops and other retail and commercial services, community services and recreational facilities. Many of these facilities are support services are located within the immediate township of Glenhaven, with a major centre available at Castle Hill (Castle Towers). The closest bus stop to the site is in front of the existing Living Choice Glenhaven retirement village, with a regular bus service (603) provided to this bus stop. The Services Context Plan included at **Attachment 2** shows the location of bus stops in relation to the subject site.
16. The land has good accessibility to the full range of services and facilities expected for the type and scale of development proposal and is capable and suitable of accommodating retirement activities. The land also has availability of the full range of urban infrastructure including water, sewer, electricity and telecommunications which would be required to service any expansion to the existing village. Infrastructure availability and provision are discussed later in this report.

## SECTION 4 – PROPOSAL DETAILS

### Summary of Proposal

17. As indicated in the Zoning Map extract included at **Attachment 4** the subject site is included within the Rural (RU6) Transition Zone under the provisions of The Hills Local Environmental Plan (LEP) 2004. Adjoining land to the south of Old Glenhaven Road is included in the Residential – R2 Low Density Residential Zone and therefore the land adjoins land that is located in an urban zoning.
18. It is proposed that a *Site Compatibility Certificate* be granted allowing the subject land to be used for the purposes of Seniors Housing (up to 140 dwellings).
19. Development Concept Plans for the proposed retirement village extension have been prepared and are included at **Attachment 1**. These plans show the following:
  - a) A total of approximately 134 dwellings can be accommodated comfortably within the development footprint whilst providing ample landscape setbacks and retained environmental areas. It is noted that 140 dwellings have been applied for as part of the SCC in case the applicant elects to make some changes to accommodate more diverse dwelling sizes as part of future detailed design.
  - b) Low rise villas are proposed on the rear portion of the site adjacent to Edgecliffe Road, these dwellings have a built form and height that is consistent and compatible with development in the broader area. Two storey villas are proposed in the parts of the land that are adjacent to the existing village and adjoining the environmental zone. Single storey villas are proposed where the land fronts or adjoins rural transition land to the north and west to provide an appropriate interface in this regard.
  - c) Low rise apartments are proposed adjacent to the existing village fronting Old Glenhaven Road. Apartments in this location are considered to be an appropriate site response as a bus stop is available immediately at the front of these apartments and a local centre is within 400m walking distance. The bulk and scale of the low rise apartments which accommodate a semi basement are in keeping with other development in the area including a recently constructed multi level aged care facility on the corner of Edgecliffe Road and Old Glenhaven Road and also existing multi level unit development that exists adjacent to the local centre on the corner of Glenhaven Road and Hyde Road. For these reasons the proposed low rise apartment product is considered to be an appropriate site response in this regard.
  - d) As shown on the section diagrams included in the Concept Plan Series the majority of the development will have a building height of less than 8m in line with the SEPP requirements however it is noted that the current building height applying to the land under the Hills Shire Council Local Environmental Plan is 10 metres. Some of the built form is proposed marginally higher (up to 8.5m



in height) however a variation to the SEPP requirements is intended to be applied for and sought as part of a future consent application.

- e) The retirement dwellings will be set in heavily landscaped grounds with ample buffers and setbacks provided to adjoining RU6 transition land;
- f) A large proportion of the site will be retained as an environmental area in line with advices from bushfire and ecology specialists.
- g) The retirement dwellings will all be accessed via internal roads from the existing Glenhaven retirement village to minimise impacts on the external road network.

### Assessment of Mapped Environmental Constraints

20. Ecological and Bushfire assessments have been undertaken by appropriately qualified consultants to assess the proposed development in relation to the mapped environmental constraints. The findings of these reports are summarised below:

21. **Ecological Assessment** – The memorandum included at **Attachment 6** outlines how environmental matters have been assessed and considered in relation to the proposed development. A full environmental assessment will be submitted as part of any future consent application to Hills Shire Council. The findings of the environmental memorandum are summarised as follows:

- The site is mapped by the Hills Council LEP Vegetation mapping;
- On site ecological assessment confirms that no threatened flora or fauna species were discovered;
- A constraints analysis map was prepared to illustrate areas of the site that were considered to have low, moderate and high ecological constraint;
- The areas of the site mapped as being 'low constraint' are the areas that accommodate the majority of the proposed development footprint;
- The areas mapped as being of 'high and moderate constraint' generally do not accommodate development infrastructure however some parts of these areas will form part of the asset protection zone required for bushfire maintenance purposes. The parts of the site located in the APZ will be required to be subjected to regular understorey clearing and maintenance for bushfire purposes however such maintenance would be by non-intensive hand maintenance rather than machinery to ensure the environmental integrity of the area is maintained.
- Any impacts associated with clearing undertaken in the APZ zone is proposed to be offset by an environmental contribution calculated in accordance with the state government approved bio banking strategy.
- This biobanking strategy will be submitted to council as part of a future consent application.
- A consent application is expected to be submitted prior to cessation of the transitional provisions for the new environmental legislation to ensure the assessment remains current.

- Therefore the proposed development has appropriately responded to matters of environmental constraint on the subject site.

22. **Bushfire Assessment** – A bushfire assessment is included at **Attachment 7** that outlines how bushfire matters have been assessed and considered in relation to the proposed development. A full bushfire assessment and management report will be submitted as part of any future consent application to Hills Shire Council. The findings of the bushfire memorandum can be summarised as follows:

- The site is partially mapped as being affected by the Hills Council LEP bushfire mapping
- An on site assessment has assessed the bushfire risk for the proposed development
- The assessment concluded that the vegetation to the north-east of the site and the slope of the land presents some risk of bushfire however such risk could be appropriately mitigated through the implementation of an Asset Protection Zone (APZ) around the proposed development footprint.
- An APZ is proposed around the periphery of the proposed dwellings to manage the risk of bushfire. This APZ is proposed in two zones – an inner protection zone and an outer protection zone.
- The inner protection zone would require the most maintenance with regular clearing and weed maintenance to occur in accordance with a prescribed schedule.
- The outer protection area would require a lower level of maintenance at less frequent intervals but in accordance with a prescribed schedule.
- A full bushfire assessment and management strategy would be lodged as part of any future development application. This report would need to be approved by both the Rural Fire Service and Council in order for the development to be approved. For current purposes the memorandum indicates that there is an acceptable strategy for resolving bushfire risk on the subject site.

#### Consultation with Council and State Government

23. A meeting was held with The Hills Shire Council on 13 February 2017 to discuss the proposed development and obtain Council feedback on the proposal prior to lodging a SCC application. The pre-lodgement minutes for this meeting are included at **Attachment 5** and demonstrate that the proposed development is considered appropriate provided various technical matters can be addressed.

24. A meeting was also had on 13 February 2017 with State Government officers to discuss the proposed SCC application. As a result of the meeting the subject site (which was previously 2 properties) was amalgamated into one land holding to ensure that it was capable of fulfilling the SCC assessment criteria in s. 25 of the SEPP particularly in relation to *“adjoining a zone for urban purposes”*. The amalgamated Survey Plan is included at **Attachment 1**.

## SECTION 5 – STRATEGIC JUSTIFICATION

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

25. The subject site is capable of being considered for a Site Compatibility Certificate as it meets the criteria outlined in the SEPP. Each of the criteria from s. 24 and s. 25 of the SEPP are addressed below:

*(1) This clause applies to a development application made pursuant to this Chapter in respect of development for the purposes of seniors housing (other than dual occupancy) if:-*

*(a) the development is proposed to be carried out on any of the following land to which this Policy applies:-*

*(i) and that adjoins land zone primarily for urban purposes;*

**Response** – The land adjoining the site to the south is zoned for urban purposes (Low Density Residential) as per the LEP Zoning Map Extract included at **Attachment 4**. Therefore the subject site is considered to adjoin land zoned for urban purposes in accordance with (1)(a)(i).

*(ii) land that is within a zone that is identified as “special uses” under another environmental planning instrument (other than land on which development for the purposes of hospitals is permitted),*

**Response** – This criteria is not applicable to the subject site.

*(iii) land that is used for the purposes of an existing registered club, or*

**Response** – This criteria is not applicable to the subject site.

*(b) the development application involves building having a floor space ratio that would require the consent authority to grant consent under clause 45*

**Response** – This criteria is not applicable to the proposed development as the development is not for a vertical retirement village.

*(1A) Despite subclause (1), this clause does not apply to a development application made pursuant to this Chapter in respect of development for the purposes of seniors housing if the proposed development is permissible with consent on the land concerned under the zoning of another environmental planning instrument.*

**Response** – This is not applicable to the subject site as the development is not currently permissible with consent under the current LEP.

*(2) A consent authority must not consent to a development application to which this clause applies unless the consent authority is satisfied that the Director-General has certified in a current site compatibility certificate, that, in the Director-General's opinion:-*

*(a) the site of the proposed development is suitable for more intensive development,*

**Response** – The subject land is considered suitable for more intensive development on the following grounds:

1. **Unsuitability of the land for Rural Purposes** – The small size of the land at 5.261 hectares makes it unviable for any rural or agricultural purpose which typically require a much a larger land area. In the event that a Rural or agricultural use was conducted on the land it would likely have visual, odour and acoustic amenity impacts on the surrounding area which is largely urban in nature including density residential development opposite the site and existing retirement village units immediately adjacent the site. The subject land and all the parcels in the area have not hosted any rural activities for a number of years and currently accommodate large dwellings on acreage style blocks. The granting of a SCC over the land would not result in a reduction of land for agricultural purposes as the land has not been used for Rural purposes in recent times and would not be used for such purposes in the future irrespective of whether a Site Compatibility Certificate was granted due to the predominantly urban context of the land.
2. **Urban location and proximity to services** – The subject land is located in close proximity to the full range of urban services including doctors, shops and other retail and commercial services, community services and recreational facilities. Many of these facilities are support services located within the immediate township of Glenhaven, with a major centre available at Castle Hill (Castle Towers). As shown on the Services Context Plan included at **Attachment 2** the subject site is within 200-300m of the nearest bus stop (on Old Glenhaven Road) and 400-800m to a local centre at 78 Glenhaven Road. The bus stop at the front of the site is serviced by a local bus service (603) running regularly during weekdays.
3. **Serviceability by infrastructure** – The land has availability of the full range of urban infrastructure including water, sewer, electricity and telecommunications which would be required to service any expansion to the existing village. Included at **Attachment 8** is a Services Advice Statement prepared by the project's engineer to confirm that the site can be serviced by all required urban infrastructure including water, sewer, electricity, gas, telecommunications and fire services. The report details how these services will be connected along with details regarding any proposed infrastructure upgrades that will be required to facilitate the extension. This report confirms that the proposed extension to

the existing retirement facility can be achieved without placing strain on existing services or infrastructure.

*(2) A consent authority must not consent to a development application to which this clause applies unless the consent authority is satisfied that the Director-General has certified in a current site compatibility certificate, that, in the Director-General's opinion:-*

...

*(b) development for the purposes of seniors housing of the kind proposed in the development application is compatible with the surrounding environment having regard to (at least) the criteria specified in clause 25 (5)(b).*

**Response** – Each clause of 25(5)(b) of the SEPP has been discussed in detail at the bottom of this page.

*(5) The Director-General must not issue a site compatibility certificate unless the Director-General:*

*(a) has taken into account the written comments (if any) concerning the consistency of the proposed development with the criteria referred to in paragraph (b) that are received from the relevant General Manager within 21 days after the application for the certificate was made, and*

**Response** – A pre-lodgement meeting has been held with Hills Council to obtain feedback on the proposed development prior to applying for a Site Compatibility Certificate. This pre-lodgement feedback is included at **Attachment 5**. These notes given an indication of the local authority's 'in principle' acceptance of the proposed development provided the site constraints and various technical requirements can be appropriately addressed and managed.

*(b) is of the opinion that the proposed development is compatible with the surrounding land uses having regard to (at least) the following criteria:*

*(i) the natural environment (including known significant environmental values, resources or hazards) and the existing uses and approved uses of land in the vicinity of the proposed development,*

**Response** – The proposed development concept has been developed in conjunction with advice from environmental and bushfire consultants who have undertaken detailed site investigations and research. The technical memorandums included at **Attachment 6** and **7** (and discussed earlier in section 4 of this report) demonstrate how the development has been sited on the areas of least environmental constraint and strategies will be put in place to ensure the risk of bushfire risk is mitigated and the environmental values of the site are protected and / or appropriately offset. These memorandums detail appropriate technical solutions to the matters of site constraint however it is also noted that detailed environmental and bushfire assessments will be required to be assessed and approved by both the Rural Fire Service and the Hills Shire Council in order for the development to be approved.

In relation to the environmental memorandum it is recognised that there has been some recent change in environmental legislation however the ecological memo confirms that there is a transitional period for such legislation and as such the original findings of this assessment remain relevant to the subject site provided a consent application is lodged with Hills Council by late November.

*(ii) the impact that the proposed development is likely to have on the uses that, in the opinion of the Director-General, are likely to be the future uses of that land,*

**Response** – The proposed future use of the land will be to accommodate an extension to the existing Glenhaven Retirement Village being the addition of up to 140 dwellings to be used for senior's housing. This pattern of development is consistent with what has already been established in the area by virtue of the immediately adjoining retirement village. In addition landscaped setback zones are proposed to ensure a sensitive interface is provided between the subject land and the surrounding area (refer to the proposed development zones plan included at **Attachment 3**). Whether or not a Site Compatibility Certificate was granted on the site, the land would inevitably continue to transition towards use for urban purposes in some form given the surrounding context and emerging character of the area.

*(iii) the services and infrastructure that are or will be available to meet the demands arising from the proposed development (particularly, retail, community, medical and transport services having regard to the location and access requirements set out in clause 26) and any proposed financial arrangements for infrastructure provision,*

**Response** – The subject land has proximity to existing public transport, retail, community and medical services in the surrounding area. The Site Context Plan included at **Attachment 2** demonstrates the site's walkability to a local bus stop within 200-300m of the site and a local centre within 400-800m of the site. The land is serviced by a local bus service that runs frequently during the week.

Granting a SCC for up to 140 senior living dwellings would be unlikely to place undue strain on local infrastructure and services with such additional dwellings more likely to improve the viability of the local bus service and the surrounding local centre facilities. Any infrastructure upgrades that may be required as a result of the proposed development would be expected to be dealt with through appropriate conditions on a development consent approval.

An Engineering Services Report is included at **Attachment 8** to this report to provide evidence that the subject site can be serviced by all requisite civil infrastructure. In terms of transport infrastructure, all car parking associated with the additional retirement village dwellings can be accommodated internally on site. Retirement villages typically have lower car parking requirements than typical residential activities as car usage rates are lower and residents tend to utilise public transport at a greater rate. The



standard and width of Old Glenhaven Road has been assessed to be sufficient to cater for the additional traffic to be generated by the proposed development. Any minor augmentation to the road network or frontage works required as a result of the proposed development are able to be conditioned by the local authority as part of the consent application process.

The land has access to public transport by virtue of a bus stop located at the front of Old Glenhaven Road between 200-300m from the subject site. This local bus service runs regularly and is considered to be adequate to cater for the demand created by additional retirement village dwellings on the subject site. Therefore we consider that this SCC clause has been adequately dealt with and responded to.

*(iv) in the case of applications in relation to land that is zoned open space or special uses—the impact that the proposed development is likely to have on the provision of land for open space and special uses in the vicinity of the development.*

**Response** – This criteria is not applicable as the land is not zoned for open space or special uses.

*(v) without limiting any other criteria, the impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the development,*

**Response** – The proposed development will be compatible with the existing built form context of the area which includes the existing Glenhaven Retirement Village directly adjoining the subject site. The proposed development is expected to be a logical continuation of this development with similar built form outcomes. It is noted that the land is also sited amongst other retirement related activities and low density residential development such that it will not be out of keeping with urban development in the surrounding area. Landscaped buffers are proposed to the interface of the development with rural transition areas to the north to ensure character impacts are adequately managed in this regard. The Development Concept Plans included at **Attachment 3** demonstrate the following key concepts:

- a) A total of approximately 134 dwellings can be accommodated comfortably within the development footprint whilst providing ample landscape setbacks and retained environmental areas. It is noted that 140 dwellings have been applied for as part of the SCC in case the applicant elects to make some changes to accommodate more diverse dwelling sizes as part of future detailed design.
- b) Low rise villas are proposed on the rear portion of the site adjacent to Edgecliffe Road, these dwellings have a built form and height that is consistent and compatible with development in the broader area. Two storey villas are proposed in the parts of the land that are adjacent to the existing village and adjoining the environmental zone. Single storey villas are proposed where the land fronts

- or adjoins rural transition land to the north and west to provide an appropriate interface in this regard.
- c) Low rise apartments are proposed adjacent to the existing village fronting Old Glenhaven Road. Apartments in this location are considered to be an appropriate site response as a bus stop is available immediately at the front of these apartments and a local centre is within 400m walking distance. The bulk and scale of the low rise apartments which accommodate a semi basement are in keeping with other development in the area including a recently constructed multi level aged care facility on the corner of Edgecliffe Road and Old Glenhaven Road and also existing multi level unit development that exists adjacent to the local centre on the corner of Glenhaven Road and Hyde Road. For these reasons the proposed low rise apartment product is considered to be an appropriate site response in this regard.
  - d) As shown on the section diagrams included in the Concept Plan Series the majority of the development will have a building height of less than 8m in line with the SEPP requirements however it is noted that the current building height applying to the land under the Hills Shire Council Local Environmental Plan is 10 metres. Some of the built form is proposed marginally higher (up to 8.5m in height) however a variation to the SEPP requirements is intended to be applied for and sought as part of a future consent application.
  - e) The retirement dwellings will be set in heavily landscaped grounds with ample buffers and setbacks provided to adjoining RU6 transition land.
  - f) A large proportion of the site will be retained as an environmental area in line with advices from bushfire and ecology specialists.
  - g) The retirement dwellings will all be accessed via internal roads from the existing Glenhaven retirement village to minimise impacts on the external road network.

For these reasons the bulk, scale and form of the proposed development is considered appropriate in light of the surrounding land use context and will not result in unreasonable amenity impacts for the surrounding area.

*(vi) if the development may involve the clearing of native vegetation that is subject to the requirements of section 12 of the Native Vegetation Act 2003—the impact that the proposed development is likely to have on the conservation and management of native vegetation.*

**Response** – As was discussed in section 4 of this report, environmental assessment has been undertaken for the land to determine on site constraints. This assessment concluded that there were no threatened flora or fauna communities present on site. Whilst the proposed development will require some vegetation clearing to accommodate asset protection zones for bushfire management, such clearing largely avoids the areas of high environmental constraint and will be limited to understorey clearing and

weed management by hand clearing only. Environmental offsets calculated in accordance with the State Government Biobanking strategy are proposed to offset the loss of vegetation on site. In relation to the environmental memorandum it is recognised that there has been some recent change in environmental legislation however the ecological memo confirms that there is a transitional period for such legislation and as such the original findings of this assessment remain relevant to the subject site provided a consent application is lodged with Hills Council by late November.

**Summary** – The subject site and the proposed development fulfils the criteria outlined in sections 24 and 25 of the SEPP and has demonstrated it will be compatible with the surrounding land uses in terms of natural hazards, siting, built form and infrastructure provision. On this basis we request a Site Compatibility Certificate for up to 140 dwellings be granted for the subject site.

### Other Considerations

26. **Need and Demand** – As has been discussed earlier in this report, the proposed extension to the existing Glenhaven Retirement Village is in response to high levels of demand for retirement dwellings in the area. In particular the current village has a wait list that exceeds 70 people. Included at **Attachment 9** is a letter from the proposed operator of the extended retirement village (Living Choice Australia). This letter is a brief summary of the current statistics for their existing Glenhaven retirement facility identifying the overwhelming demand for retirement dwellings being experienced. This correspondence identifies that Living Choice Glenhaven currently have a waitlist of 147 people for dwellings within the existing facility. This correspondence also identifies an occupancy rate of 98% with properties typically re-leased within 90 days of refurbishment occurring and also an extensive list of people who have expressed interest in the facility. This information coupled with the broader demographic trends for the region showing an increased demand for retirement and aged care options over the next 20 years which are compelling factors to demonstrate that the need for retirement living uses in the surrounding area is strong.
27. **Job Creation** – The proposed development will stimulate employment opportunities in the area during construction and in the ongoing management and operation of the proposed extended village.
28. **Housing Choice** – The proposed development will deliver additional choice in housing for retirees as it proposes the incorporation of some low rise apartments to fulfil a dwelling demand that is not currently satisfied in the surrounding area.
29. **Efficient use of infrastructure** – the subject land has connection to all relevant urban infrastructure, the proposed development will realise a more efficient use of the land than is otherwise achieved and will assist in improving the viability of surrounding community services and activities.

## SECTION 6 - CONCLUSIONS

30. This report has been prepared to accompany an application to the Director-General of the Department of Planning & Environment for a Site Compatibility Certificate under Chapter 3, Part 1A of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (the SEPP). This application seeks SCC approval for up to 140 dwellings to be permitted on the land.
31. The site is Zoned Rural – RU6 Transition under The Hills Local Environmental Plan 2012, however, is located adjoining land included with the Residential – R2 Low Density Residential Zone. The area is in a state of transition towards urban uses.
32. The site has excellent proximity to local services, facilities and amenities. The land is a short walking distance from a bus stop and local centre and is surrounded by other urban activities including community and commercial uses and services.
33. Retirement activities are compatible with the existing built form and character of the area which includes an existing retirement village immediately adjacent to the site, an aged care facility 500m from the site and a range of other low to medium density developments in the surrounding area. A combination of retained environmental areas and landscaped buffers will be provided to provide a transition between the development and remaining rural transition areas.
34. The proposal was motivated by the significant need and demand for retirement living in this area. The proposal will deliver additional dwelling choice and diversity as well as employment benefits during the construction phase and operational life of the development. The proposed expansion will also assist in adding vibrancy and viability to surrounding services and infrastructure.
35. This report demonstrates that the development will be compatible with development on adjoining land and is unlikely to have any environmental impacts with environmental and bushfire reporting concluding that any constraint is able to be appropriately managed through technical solutions.
36. Having regard to this assessment, it is considered that the subject site and proposed use satisfies the requirements for a Site Compatibility Certificate under the SEPP and should be approved on that basis.