

3 September 2019

Mr Greg Sullivan
Hunter and Central Coast Planning Panel
Acting Director Central Coast and Hunter
Planning Assessments
Po Box 1226
Newcastle NSW 2300

Your ref: SCC 2019 MCOAS 002
Enquiries: Petula Bowden

Dear Sir

Site Compatibility Certificate - 333 Diamond Beach Road, Diamond Beach.

Council's Planning Team has reviewed the Site Compatibility Certificate Application for Lot 321 DP 1242093 (No. 333 Diamond Beach Road Diamond Beach) and offers the following comments:

Strategic

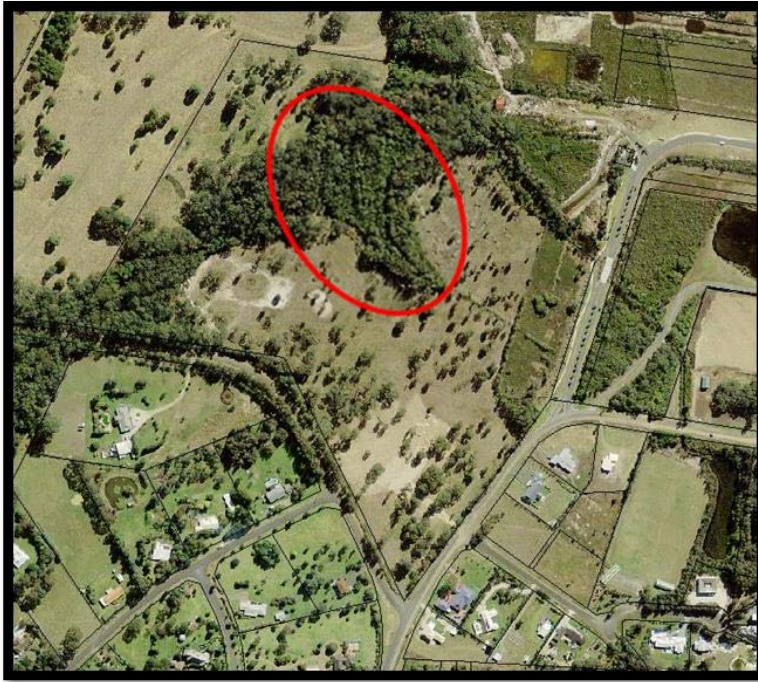
Council's draft Housing Strategy is anticipated to be reported to Council on 25 September 2019 seeking endorsement for progression to exhibition. This strategy will identify land to the immediate east of this land (Ramada and Seashells Resorts) to be rezoned from SP3 -Tourist to R3- Medium Density Residential as part of the new MidCoast LEP. If supported by Council and DPIE this would see land to the east of the site accommodating a medium density built form with 3-4 storey development.

In the longer term long-term Council envisages that subsequent housing strategies would recommend rezoning the remaining rural land between the current SP3 zone to the east and the Nature Reserve to the west (i.e. the rural zone in this location is not seen as appropriate long-term as it has minimal agricultural value and is more suited to residential and environmental zones reflective of the site constraints). Indicative residential zones would be R2 or R1.

Taking into consideration the future likely character of this immediate area, a Seniors Living development on 333 Diamond Beach Road would be in keeping with the desired future character in regard to built form.

Ecology

This property is currently under investigation by the EPA in relation to the removal of native vegetation. Photos below show evidence of significant clearing on the property over the last 6 years, particularly from the Moor Creek riparian area and the previously identified Swamp Sclerophyll Forest Endangered Ecological Community, which is now proposed for development (see area circled in red on photo below). [Photos of the clearing and associated damage to Moor Creek can be provided at DPIE's request.] The current consent which relates to this property includes conditions to retain and regenerate this area in accordance with an approved Ecological Site Management Plan. The current consent also contains conditions around the retention of a 30m wide habitat corridor for the threatened Wallum Froglet, which has also been cleared and now proposed for development.



On page 7 of the Site Compatibility Certificate Report it is stated that the vegetation cover across the site has been modified as a result of past activities which include low intensity grazing and rural residential occupation. There is no dwelling on the site and it has not been occupied for residential purposes. The cleared status of the land is being relied upon to facilitate the development footprint.

Figure 9 on page 19 does not accurately map the native vegetation surrounding the site, nor the E2 zoned land to the East which is significant for ecological connectivity purposes.

The SCC does not acknowledge the EEC vegetation mapped on the site in the context of the additional clearing required. The tree removal plan clearly shows a number of trees to be



removed, however the Vegetation Assessment Report states that only native grassland is to be cleared.



Please note that the Site Compatibility Certificate Report refers to the *Native Vegetation Act* which has been repealed by the *Local Land Services Act* and no longer requires dual consent for developments on rural zoned land. Any subsequent DA will need to address the provisions of the new *Biodiversity Conservation Act*.

The Vegetation Assessment Report is outdated and references a site layout applicable to the previous application for a SCC on this site.

Density

The current proposal indicates dwelling numbers of 240 across a land area of 20.5 ha.

While the density is not inconsistent with that typical of other seniors living developments, in this locality the density is inconsistent with the character of the existing surrounding development. The proposed layout does not demonstrate adequate consideration of immediately adjoining development types in terms of setbacks, separation, and clustering to emulate a rural residential style of development.

In the event that a Site Compatibility Certificate is issued it is Council's preference that it not specify the number of dwellings permitted on the site, but rather excludes certain sensitive areas of the site from development and reinforces that the development achieve objectives focused on density and compatibility with adjoining developments.

Facilities and Services

The availability of services to the development are restricted by the location of the site at the northern most end of Diamond Beach Road and the distance of some 3.4km to the Hallidays Point shops.

Existing Development Approvals

632/2010/DA and 317/2008/DA currently exist on this land in conjunction with Lot 320.

The proposed development layout does not reflect the current approved development footprint (317/2008/DA) which incorporates a much larger conservation area referred to as the Moor Creek Environmental Corridor (refer to APZ & Riparian Zone Site Plan prepared by Austin McFarland Architects and dated 4/11/11). Previously a 50m wide riparian corridor was proposed (which has now been reduced to 40m) and a 30m wide Wallum Froglet Corridor, which is absent from the proposal.

Site layout

The proposal does not provide a development footprint that indicates all required roadways, dwellings, stormwater management devices etc to enable the comprehensive assessment of the total site impacts. The location of detention devices may increase the need for further vegetation removal, or reduced dwelling numbers.

Additional justification to demonstrate how the applicant has addressed the issues raised by the Department in the previous refusal of a SCC on this land is considered necessary (see 1.3 of Report). Specifically:

- a. It is not clear how the proposed development is 'in keeping' with the existing large lot residential development to the south;
- b. The proposed layout plan does not demonstrate clustering of lots. It is also not considered that the 'Edgewater Shores' development can be characterised as a 'medium density residential subdivision' and form justification for the subject proposal; and
- c. The Lake Cathie shopping centre is not an equivalent facility to the Hallidays Point Shops and cannot be used as justification for the distance of the proposed development to suitable facilities.

Yours sincerely



Petula Bowden
Senior Town Planner
Development Services



Legal Advice

To Ben Holmes, A/Team Leader, Hunter Region
From Kritika Naidu, Legal Officer, Legal Service Division
Phone: (02) 9373 2823 Fax: (02) 9228 6388 Email: kritika.naidu@planning.nsw.gov.au
Date 18 October 2017

**Legal Advice – Senior Housing SEPP – Lot 200 in Deposited Plan 740455 known as 333
Diamond Beach Road, Diamond Beach NSW 2430**

Contents

Advice sought	Page 2
Summary of advice	Page 2
Background	Page 2
Advice	Page 3

Advice sought

We refer to your memorandum dated 6 October 2017 requesting legal advice in relation to whether the *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (SEPP)* applies to land at Lot 200 in Deposited Plan 740455 known as 333 Diamond Beach Road, Diamond Beach NSW 2430 (**Land**).

The question you have asked for advice and a summary of our advice in response to the question is set out below.

Summary of advice

Questions: Does the SEPP apply to the Land?

Answer: The better view is 'yes' because, while the Land itself is not zoned for urban purpose, it "adjoins" land zoned R1 General Residential, which we consider to be land zoned primarily for urban purposes.

Background

We understand that a site compatibility certificate has been sought for the Land under clause 24 of the SEPP for a seniors housing proposal. Clause 24 provides, where the development is proposed to be executed on land that "adjoins land zoned primarily for urban purposes", the consent authority will not be able to grant consent unless the Secretary has issued a site compatibility certificate.

We are instructed, via the map provided in the request for legal advice that:

- a) the Land is zoned RU1 Primary Production, under the *Greater Taree Local Environmental Plan 2010 (LEP)*; and
- b) the land immediately to the southern extremity of the Land (i.e. at the point immediately opposite the intersection of Diamond Beach Road and Old Soldiers Road), is zoned R1 General Residential.

We note we have not been instructed on the distance between the Land and the land zoned R1.

You have asked us to advise whether the SEPP applies to the Land, in particular, on the basis that the Land 'adjoins land zoned primarily for urban purposes'.

In preparing this advice, we have considered the following documents:

- a) legal advice prepared for the Applicant by Counsel, dated 3 February 2016; and
- b) site compatibility certificate application as provided to us as Attachment A.

Advice

We have reviewed the advice received by the Applicant from Counsel and agree with that advice. The advice which follows is our view on the matter.

Is the land zoned primarily for urban purposes?

Under clause 4(1) of the SEPP, the SEPP applies to land within New South Wales that is land zoned primarily for urban purposes or land that adjoins land zoned primarily for urban purposes, but only if:

- a) development for the purpose of any of the following is permitted on the land:
 - (i) dwelling-houses,
 - (ii) residential flat buildings,
 - (iii) hospitals,
 - (iv) development of a kind identified in respect of land zoned as special uses, including (but not limited to) churches, convents, educational establishments, schools and seminaries, or
- b) the land is being used for the purposes of an existing registered club

Under clause 4(2) of the SEPP, land is not zoned primarily for urban purposes if it is:

- a) identified as principally for rural uses;
- b) a zone that is identified as principally for urban investigation; or
- c) a zone that is identified as principally for residential uses on large residential allotments (for example, zones R5 large Residential and RU6 Transition referred to in the standard instrument for principal local environmental planning instruments).

It is important to consider the objectives of the LEP, the objectives of the zone and the permitted purposes under the zone when determining whether the Land is identified as principally for rural purposes.

The Land is zoned RU1, which has the objectives of, amongst other objectives, encouraging sustainable primary industry production by maintaining and enhancing the natural resource base, encouraging diversity in primary industry enterprises and systems appropriate for the area and permitting small scale rural tourism uses associated with primary production and environmental conservation with minimal impact on primary production and the scenic amenity of the area. RU1 zoned land in the LEP permits use of the land without consent for extensive agriculture, forestry, home occupations and intensive plant agriculture.

In our view, having regarded the objective of the LEP and the permitted and prohibited uses of RU1 zoned land in the LEP, the Land is zoned principally for rural purposes and pursuant to clause 4(2)(a) of the SEPP, the Land is not zoned primarily for urban purposes.

Given the above, the relevant question is then whether the Land 'adjoins' land 'zoned primarily for urban purposes', such that the SEPP applies.

Does the Land adjoin land zoned primarily for urban purposes?

The land to the northern end of the Land is zoned RU1 under the LEP. As stated above, RU1 land is not characterised as land which is primarily zoned for urban purposes. The land to the southern end of the Land is zoned R5 under the LEP. Pursuant to clause 4(2)(c) of the SEPP, land zoned R5 is not land zoned primarily for urban purposes

The southern extremity of the Land borders the road intersection of Diamond Beach Road and Old Soldiers Road which leads to land which is zoned R1 under the LEP. The relevant questions are whether:

- a) the land zoned R1 is 'zoned primarily for urban purposes'; and
- b) the land zoned R1 'adjoins' the Land, such that the SEPP applies.

We have reviewed a number of cases that have considered whether the land is zoned primarily for urban purposes. The Oxford English Dictionary defines 'urban' as meaning 'pertaining to, or constituting a city or town'.

An interpretation of 'urban purpose' being a purpose 'pertaining to a city or town' has also been adopted by the Courts in various cases including:

- a) *Modog v Baulkham Hills Shire Council* [2000] NSWLEC 180; (2000) 109 LGERA 443 at [12];
- b) *Murlan Consulting v Ku-ring-gai Municipal Council* [2007] NSWLEC 182 at [23]; and
- c) *Warriewood Properties Pty Ltd v Pittwater Council* [2010] NSWLEC 215.

The courts have held that these 'purposes' will include:

- a) dwelling houses, residential flat buildings, hospital, churches, schools etc¹;
- b) public recreational purposes including parks, gardens, recreation area, playgrounds, sports ground etc²; and
- c) development for the purposes of utility installation, including the supply of water, electricity and gas etc³.

Under the LEP, objectives of land zoned R1 include providing for housing needs of the community, providing for a variety of housing types and densities and enabling other land uses that provide facilities or services to meet the day to day needs of residents. Furthermore, R1 zoned land under the LEP permits (amongst others) dwelling houses, places of public worship such as churches and residential flat buildings which categorises the land as land primary for urban purposes. Therefore, considering the above, our conclusion is that land zoned R1 under the SEPP is land zoned primarily for urban purposes.

¹ *Modog v Baulkham Hills Shire Council* [2000] NSWLEC 180; (2000) 109 LGERA 443.

² *Dougruby Pty Ltd v Wingecarribee Shire Council* [2004] NSWLEC 192 at [17].

³ *Murlan Consulting v Ku-ring-gai Municipal Council* [2007] NSWLEC 182.

As for whether it 'adjoins' the Land, under clause 4(4) of the SEPP,

"land that adjoins land that is zoned primarily for urban purposes includes (but is not limited to) land that would directly adjoin land that is zoned primarily for urban purposes but for the presence of a public road to which there is direct vehicular and pedestrian access from the adjoining land".

The Courts has considered what constitutes land 'adjoining' land zoned primarily for urban purposes. The Courts have considered the term "adjoin" is not restricted to land that directly adjoins or abuts urban land and is intended to bear its loose sense of 'near to' or 'neighbouring on' rather than its exact meaning of 'is conterminous with'⁴.

In the case of *ACN 115 840 509 Pty Limited v Kiama Municipal Council* [2006] NSWLEC 151 (**Kiama**), the court held that the urban land was held to be 'adjoining' despite being approximately 65 meters away from the subject land, and was separated by the Princess Highway and Illawarra railway line. The Court also held that it was irrelevant that direct vehicular and pedestrian access across the Highway and railway line to the residential zoned land did not exist and that the connecting road involved a distance of over 1 kilometre.

In the case of *Hornsby Shire Council v Malcom* [1986] 60 LGERA 29 at [433-434] (**Malcom**), the Court of Appeal held that 'adjoining' is not intended to mean that immediate physical contiguity must exist. Instead, it denotes proximity to the land in question. In that case Kirby P observed that road reserved exist as a normal feature of urban development. Kirby P went on to stated that in determining whether the subject land 'adjoins' the urban land, one must consider the purpose of the policy which is to ensure that homes for the aged or disabled should be constructed in urban area both for the interests of residents and for the saving of costs to the community.

Both the Kiama and Malcom case and clause 4(4) of the SEPP support the proposition that where non-urban land is separated from urban land by an intervening lot, such as a road, and/or a minor distance, the non-urban land may reasonably be found to be in 'sufficient proximity' to the urban land so as to satisfy clause 4(4) of the SEPP.

The advice received by the Applicant from Counsel states that the extent to which the lands would be directly adjoined by a common boundary, but for the road, is relatively minimal. Counsel's advice concludes that in the circumstances the Land both 'directly adjoins' (but for the presence of the public road) and is also near to or is neighbouring or is in sufficient proximity to the land which is zoned R1.

Based on our analysis above, we agree with Counsel's advice in that there appears to be a reasonable basis that the Land can be considered to 'adjoin' land zoned primarily for urban purposes because:

- a) The land zoned R1 can be categorised as land zoned primary for urban purposes and satisfies clause 4(1) of the SEPP;
- b) While the Land and land zoned R1 are not directly connecting to one another, they can be said to be both 'near', 'neighbouring on' and in 'close proximity' to one another, fitting the scope of 'adjoining';
- c) Similar to the Kiama case, the southern extremity of the Land would adjoin land zoned R1 but for the presence of the public road; and

⁴ *Auckland Lai v Warringah Shire Council* (1985) 58 LGERA 276 at 9283-284].

- d) we do not believe the land zoned R1 falls under any of the exclusions in Schedule 1 of the SEPP, having regards to the Court of Appeal decision in *Pepperwood Ridge v Newcastle City Council* [2006] NSWCA 122.

For this reason, our view is that the SEPP does apply to the Land.



Kritika Naidu
Legal Officer
Legal Services Division



Margaret Cheung
Principal Legal Officer
Legal Services Division

Date: 4 October 2019

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T +61 2 4940 4200

Department of Planning, Industry and Environment
Level 2
26 Honeysuckle Drive
NEWCASTLE NSW 2300

Attention: James Shelton, Acting Team Leader

Dear James,

Additional information for site compatibility certificate – SCC_2019_MCOAS_002_00

RPS wishes to provide the following additional information to the Department of Planning, Infrastructure and Environment (DPIE) in relation to the above site compatibility certificate application.

The information relates to the assessment of the likely demands arising from the proposed development (particularly retail, community and medical services having regard to the location and access requirements set out in clause 26 of the *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004*). The information provides data of 50 existing seniors living developments in relation to their location to retail nodes, GPs / medical practises and hospitals.

It is requested that the additional information is considered in the DPIE assessment of the above-mentioned application as it clearly illustrates the subject site is well within normal distances as defined by similar existing developments in the area.

Location and access to facilities from the site

The site is located within the MidCoast local government area (LGA) approximately 650m from the Diamond Beach shops and approximately 3.8km from the Hallidays Point Village Square. The Village Square includes a Foodworks Supermarket, Chemist, Bakery and Café, Butchery, Newsagent, Automatic Teller Machine and Post Office. The Hallidays Point Tavern is located 200 metres to the west of the Village Square.

A medical centre is located immediately to the east of the Hallidays Point Tavern which includes GP services and pathology. Medical specialists and public and private hospitals are also available in Taree, Forster and Tuncurry and the area is served by several home nursing care services.

Road access from the site to the retail and medical services is along Diamond Beach and a shorter leg along Blackhead Road.

A regular minibus service will be provided by the Resort, linking future residents to retail, community and support services in the area including but not limited to shops, banks, health and wellbeing and recreational facilities. The minibus service will provide services multiple times each and every day to not only the Hallidays Point Village Square but also the Tallwoods Golf Club, Foster-Tuncurry and Taree. Residents will therefore have an obvious and reliable alternative to the use of private vehicles. This

operational aspect of the site / Resort negates the need for residents to rely on local public transport and will further strengthen the community feel of the development. Indeed, this type of community transport will be a factor in ensuring strong community bonds are formed within the Resort.

A daily local bus service from Eggins Comfort Coaches services Diamond Beach along Diamond Beach Road. The evolving and more urbanised character of the broader area will increase demand for further and more frequent bus services in the future.

Reticulated water and sewer are available to the land and are provided by MidCoast Water. Electricity and telecommunications are also available in the area.

Other seniors living developments in the region

RPS has carried out a locational analysis of 50 constructed senior living developments in the region. The analysis was confined to predominately coastal locations being the eastern side of the Pacific Highway within the MidCoast local government area (35 sites), the Tomaree Peninsula and eastern side of the Port Stephens LGA (10 sites) and other examples within Port Macquarie-Hastings, Lake Macquarie and Maitland LGAs (5 sites).

Methodology

Utilising the data bases contained within NSW Six Maps, Google Earth and Google RPS identified 51 existing seniors living sites. Utilising the same data bases RPS then identified retail, hospitals, GP's and medical practices in the closest proximity to each of the locations. Distances between each of the existing seniors living sites and the closest retail, hospital and medical practices were then calculated. The results from the data collection were converted into an Excel spreadsheet.

Comparisons were then made against the location distances applicable to the project site being 333 Diamond Beach Road. The site is 3,800 metres from the Hallidays Point Village Square (noting two small shops exist at Diamond Beach some 650 metres from the site), 3,800 metres from the closest GP / medical practice and 19 kilometres from the nearest hospital. All data is contained in **Attachment 1**.

Aerial plans indicating the location of the existing seniors living sites within the MidCoast LGA are contained in **Attachment 2**.

In relation to the data contained in **Attachment 1** it has been acknowledged by the planning profession that 800 metres represents a typical 10-minute walk. Studies into urban design and pedestrian movement indicates that pedestrian movement to retail and medical services beyond 800 metres drops significantly and alternate modes of movement such as public transport, bicycles and private vehicles are chosen by individuals. Hence the data in **Attachment 1** refers to 10-minute walking distances for comparison purposes.

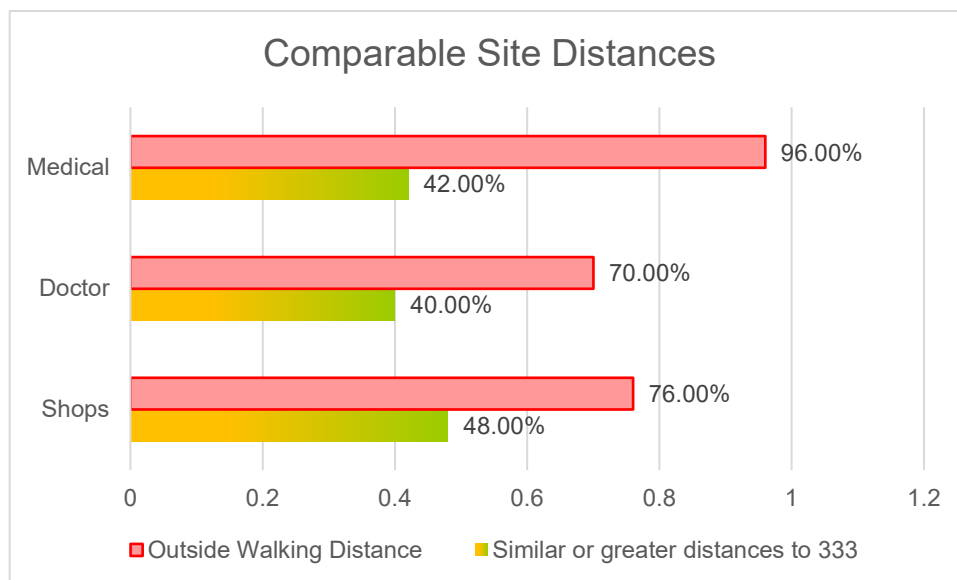
Results of the location analysis of other seniors living developments

Results from the analysis, based upon the 50 sites, include the following:

- 76% of the sites are outside the nearest retail (shops) node in terms of walking distance;
- 70% of the sites are outside the nearest GP / medical in terms of walking distance;
- 96% of the sites are outside the nearest hospital in terms of walking distance;
- 48% of the total number of sites have similar or greater distances from the nearest shops;

- 40% of the total number of sites have similar or greater distances from the nearest GP / medical practice; and
- 42% of the total number of sites have similar or greater distances from the nearest hospital.

The above is illustrated in the bar chart below.



Conclusion

The information provided clearly indicates that the vast majority of the existing seniors living developments identified by RPS are beyond a 10 minute (800 metre) walk from the respective site to shops, GP / medical practice and hospital.

At a minimum 40% of the nominated sites have similar or greater distances between them and retail nodes (shops), GP's / medical practices and hospitals.

The underlying theme from this analysis is that the proposed site is well within normal limits when compared to distance from important services.

We request that the additional information provided be considered in the DPIE assessment of the above-mentioned application particularly in relation to retail, community, medical and transport services having regard to the location and access requirements set out in clause 26 and clause 25(5)(b)(iii) of *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004*.

Our ref: PR141436-1



Yours sincerely,
for RPS Australia East Pty Ltd

A handwritten signature in black ink, appearing to read 'Rob Dwyer'.

Rob Dwyer
Planning Manager - Newcastle
rob.dwyer@rpsgroup.com.au
4940 4200
0425 285 778

- Attachment 1 – Locational data
- Attachment 2 – Aerial plans

ATTACHMENT 1 – LOCATIONAL DATA

FID	Type	Name	LGA	Dist_Shops	Dist_Doc	Dist_Medic
9	Retirement Village	GREAT LAKES NURSING HOME	MC	940	186	76
4	Nursing Home	GREAT LAKES AGED CARE BULAHDELAH	MC	880	133	133
21	Community Home	TRANSITIONAL AGED CARE SERVICE-LOWER MID NTH COAST	MC	100	390	390
19	Retirement Village	TAREE GARDENS TAREE	MC	1800	1500	1500
31	Nursing Home	BAPTISTCARE KULAROO CENTRE	MC	850	440	1600
15	Retirement Village	STORM RETIREMENT VILLAGE	MC	1800	2000	2000
14	Retirement Village	TAREE LEGACY VILLAGE	MC	1900	2200	2200
0	Nursing Home	ESTIA HEALTH TUNCURRY	MC	720	720	2500
29	Retirement Village	GLAICA GARDENS	MC	930	930	2800
30	Retirement Village	GLAICA LION'S VILLAGE	MC	930	930	2800
27	Community Home	GLAICA HOUSE	MC	1000	1000	2900
28	Retirement Village	TUNCURRY LEGACY VILLAGE	MC	1200	1200	3000
3	Nursing Home	ESTIA HEALTH FORSTER	MC	1800	1300	3000
25	Retirement Village	GOLDEN PONDS RETIREMENT RESORT	MC	1900	1400	3000
33	Tourist Park / Home Village	CRYSTAL WATERS ESTATE	MC	1500	1570	3150
16	Retirement Village	BUSHLAND PLACE VILLA UNITS	MC	2800	944	3200
17	Community Home	BUSHLAND PLACE HOSTEL	MC	2800	870	3200
18	Community Home	ANGLICAN CARE STORM VILLAGE	MC	2800	820	3200
11	Community Home	KARINGAL GARDENS	MC	2880	3300	3300
20	Retirement Village	C C DRURY VILLAS	MC	3000	3300	3300
1	Nursing Home	ESTIA HEALTH TAREE	MC	4400	4000	4000
26	Retirement Village	SUNRISE SUPPORTED LIVING TUNCURRY	MC	2400	2400	4200
10	Retirement Village	NULAMA VILLAGE	MC	3800	4200	4200
13	Retirement Village	WARRANA PLACE	MC	4500	4200	4200
12	Retirement Village	NULAMA VILLAGE	MC	3950	4400	4400
3	Retirement Village	Oak Tree Retirement Village Rutherford	OT	1600	1600	4900
2	Nursing Home	CALVARY ST PAULS RETIREMENT COMMUNITY	MC	6000	6000	6000
24	Community Home	ANGLICAN CARE BISHOP TYRRELL PLACE	MC	6000	6000	6000
6	Retirement Village	Gateway Lifestyle Sea Winds, Anna Bay	PS	4200	4200	7500
5	Retirement Village	Middle Rock Home Village, Anna Bay	PS	3800	3800	7700
3	Retirement Village	Gateway Lifestyle Homestead, Salamander Bay	PS	400	400	10400
7	Retirement Village	Gateway Lifestyle Salamander Bay	PS	500	500	10900
2	Retirement Village	Ingenia Lifestyle Latitude One, Anna Bay	PS	2500	2500	10900
4	Retirement Village	Birubi Sands Anna Bay	PS	2500	2500	11000
9	Retirement Village	Anna Bay Village	PS	2600	2600	12000
8	Retirement Village	Gateway Lifestyle Birubi	PS	500	500	12100
32	Retirement Village	HALLIDAY SHORES	MC	287	450	13260
22	Retirement Village	BANYULA VILLAGE	MC	660	660	13500
23	Community Home	BANYULA LODGE	MC	660	660	13500
34	Retirement Village	CLIFFTON OLD BAR	MC	750	750	14000
1	Retirement Village	Palm Lake Resort Fern Bay	PS	6000	0	14600
		333 DIAMOND BEACH RD	MC	3800	3800	19000
2	Retirement Village	Ocean Club Resort, Lake Cathie	OT	2900	1400	20700
10	Retirement Village	Banskia Grove, Williamtown	PS	4400	4400	22300
1	Retirement Village	Ingenia Lifestyle The Grange Morisset	OT	1070	1070	26100
5	Nursing Home	ESTIA HEALTH TEA GARDENS	MC	566	566	28000
6	Retirement Village	TEA GARDENS GRANGE LIFESTYLE RESORT	MC	710	710	28000
8	Retirement Village	PALM LAKE RESORT TEA GARDENS	MC	1041	1041	30000
7	Community Home	PETER SINCLAIR GARDENS	MC	427	440	30500
4	Retirement Village	Laurieton Residential Resort, Laurieton	OT	650	6000	31800
5	Retirement Village	79 Batar Creek Road Kendall Woodglen Lifestyle Resort	OT	1850	9500	32000

Total sites	50	50	50
Similar or greater distances to 333	24	20	21
Distances in orange or green	48.00%	40.00%	42.00%
Outside Walking Distance	38	35	48
Distances greater than 800m	76.00%	70.00%	96.00%

Shops

Doctor

Hospital

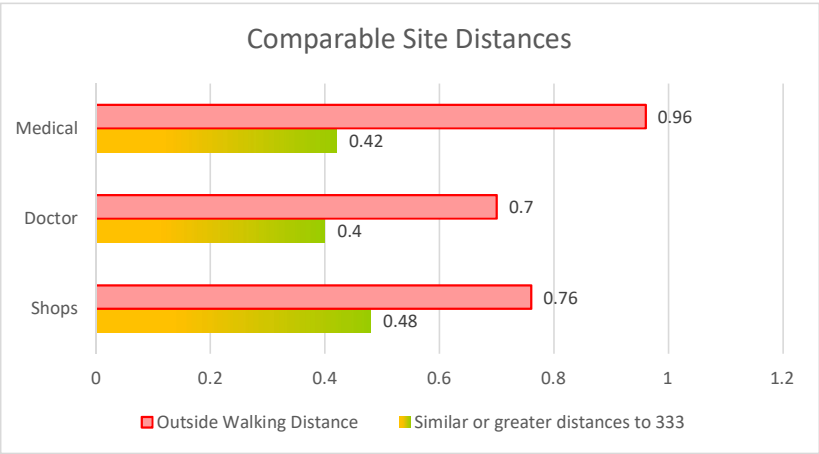
Legend

Dist_Shops column = distance to nearest shops
Dist_Doc column = distance to nearest GP or medical practice
Dist_Medic doc = distance to nearest hospital

	Distances in red highlight is for 333 Diamond Beach Road, Diamond Beach
	Distances greater than walking distance but less than similar distances
	Distances in green highlight is for villages further from services than 333 DBR
	Distances in orange - Villages in comparable range (1800m - 3700m) to 333 DBR
	Medic in comparable range 10km to 19km

Walking Distance

This refers to a typical 10 minute (800 m) walk.



Walking distance

This refers to a typical 10 minute (800 m) walk.

FID	poitype	poilabel	supplydate	Dist_Shops	Dist_Medic	Dist_Doc	Local Shops
0	Nursing Home	ESTIA HEALTH TUNCURRY	2018-01-31	720	2500	720	
1	Nursing Home	ESTIA HEALTH TAREE	2018-01-31	4400	4000	4000	
2	Nursing Home	CALVARY ST PAULS RETIREMENT COMMUNITY	2018-01-31	6000	6000	6000	
3	Nursing Home	ESTIA HEALTH FORSTER	2018-01-31	1800	3000	1300	
4	Nursing Home	GREAT LAKES AGED CARE BULAHDELAH	2018-01-31	880	133	133	
5	Nursing Home	ESTIA HEALTH TEA GARDENS	2018-01-31	566	28000	566	
6	Retirement Village	TEA GARDENS GRANGE LIFESTYLE RESORT	2018-01-31	710	28000	710	
7	Community Home	PETER SINCLAIR GARDENS	2018-01-31	427	30500	440	
8	Retirement Village	PALM LAKE RESORT TEA GARDENS	2018-01-31	1041	30000	1041	
9	Retirement Village	GREAT LAKES NURSING HOME	2018-01-31	940	76	186	
10	Retirement Village	NULAMA VILLAGE	2018-01-31	3800	4200	4200	
11	Community Home	KARINGAL GARDENS	2018-01-31	2880	3300	3300	
12	Retirement Village	NULAMA VILLAGE	2018-01-31	3950	4400	4400	
13	Retirement Village	WARRANA PLACE	2018-01-31	4500	4200	4200	
14	Retirement Village	TAREE LEGACY VILLAGE	2018-01-31	1900	2200	2200	
15	Retirement Village	STORM RETIREMENT VILLAGE	2018-01-31	1800	2000	2000	
16	Retirement Village	BUSHLAND PLACE VILLA UNITS	2018-01-31	2800	3200	944	
17	Community Home	BUSHLAND PLACE HOSTEL	2018-01-31	2800	3200	870	
18	Community Home	ANGLICAN CARE STORM VILLAGE	2018-01-31	2800	3200	820	
19	Retirement Village	TAREE GARDENS TAREE	2018-01-31	1800	1500	1500	
20	Retirement Village	C C DRURY VILLAS	2018-01-31	3000	3300	3300	
21	Community Home	TRANSITIONAL AGED CARE SERVICE-LOWER MID NTH COAST	2018-01-31	100	390	390	
22	Retirement Village	BANYULA VILLAGE	2018-01-31	660	13500	660	
23	Community Home	BANYULA LODGE	2018-01-31	660	13500	660	
24	Community Home	ANGLICAN CARE BISHOP TYRRELL PLACE	2018-01-31	6000	6000	6000	
25	Retirement Village	GOLDEN PONDS RETIREMENT RESORT	2018-01-31	1900	3000	1400	
26	Retirement Village	SUNRISE SUPPORTED LIVING TUNCURRY	2018-01-31	2400	4200	2400	
27	Community Home	GLAICA HOUSE	2018-01-31	1000	2900	1000	
28	Retirement Village	TUNCURRY LEGACY VILLAGE	2018-01-31	1200	3000	1200	
29	Retirement Village	GLAICA GARDENS	2018-01-31	930	2800	930	
30	Retirement Village	GLAICA LION'S VILLAGE	2018-01-31	930	2800	930	
31	Nursing Home	BAPTISTCARE KULAROO CENTRE	2018-01-31	850	1600	440	
32	Retirement Village	HALLIDAY SHORES	2018-01-31	287	13260	450	
33	Tourist Park / Home Village	CRYSTAL WATERS ESTATE	2018-01-31	1500	3150	1570	
34	Retirement Village	CLIFFTON OLD BAR	2019-09-30	750	14000	750	
0		333 DIAMOND BEACH RD	2019-09-30	3800	19000	3800	650

Legend

Dist_Shops column = distance to nearest shops
Dist_Doc column = distance to nearest GP or medical practice
Dist_Medic doc = distance to nearest hospital

	Distances in red highlight is for 333 Diamond Beach Road, Diamond Beach
	Distances greater than walking distance but less than similar distances
	Distances in green highlight is for villages further from services than 333 DBR
	Distances in orange - Villages in comparable range (1800m - 3700m) to 333 DBR
	Medic in comparable range 10km to 19km

Walking Distance

This refers to a typical 10 minute (800 m) walk.

Observations

35 examples above

6 examples of villages further away than 333 DBR from shops and medical services / GPs.

17 examples of villages either further away from or in comparable range (1800m - 3700m) with 333 DBR to shops and medical services / GPs.

4 examples homes / villages further away than 333 DBR from hospital facilities

				Dist_Shops	Dist_Medic	Dist_Doc	Local Shops
1	Retirement Village	Palm Lake Resort Fern Bay	INHOUSE MEDICAL	6000	14600	0	
2	Retirement Village	Ingenia Lifestyle Latitude One, Anna Bay		2500	10900	2500	
3	Retirement Village	Gateway Lifestyle Homestead, Salamander Bay		400	10400	400	
4	Retirement Village	Birubi Sands Anna Bay		2500	11000	2500	
5	Retirement Village	Middle Rock Home Village, Anna Bay		3800	7700	3800	
6	Retirement Village	Gateway Lifestyle Sea Winds, Anna Bay		4200	7500	4200	
7	Retirement Village	Gateway Lifestyle Salamander Bay		500	10900	500	
8	Retirement Village	Gateway Lifestyle Birubi		500	12100	500	
9	Retirement Village	Anna Bay Village		2600	12000	2600	
10	Retirement Village	Banskia Grove, Williamtown		4400	22300	4400	
		333 DIAMOND BEACH RD		3800	19000	3800	650

Legend

Dist_Shops column = distance to nearest shops
Dist_Doc column = distance to nearest GP or medical practice
Dist_Medic doc = distance to nearest hospital

Distances in red highlight is for 333 Diamond Beach Road, Diamond Beach

Distances greater than walking distance but less than similar distances

Distances in green highlight is for villages further from services than 333 DBR

Distances in orange - Villages in comparable range (1800m - 3700m) to 333 DBR

Medic in comparable range 10km to 19km

Walking Distance
This refers to a typical 10 minute (800 m) walk.

Observations
10 examples above
4 examples of villages further away than 333 DBR from shops and medical services / GPs (includes Palm Lake Reort Fern Bay which has
7 examples of villages either further away from or in comparable range (1800m - 3700m) with 333 DBR to shops and medical services / GPs
1 village further away than 333 DBR from hospital facilities

			Dist_Shops	Dist_Medic	Dist_Doc	Local Shops
1	Retirement Village	Ingenia Lifestyle The Grange Morisset	1070	26100	1070	
2	Retirement Village	Ocean Club Resort, Lake Cathie	2900	20700	1400	
3	Retirement Village	Oak Tree Retirement Village Rutherford	1600	4900	1600	
4	Retirement Village	Laurieton Residential Resort, Laurieton	650	31800	6000	
5	Retirement Village	79 Batar Creek Road Kendall Woodglen Lifestyle Resort	1850	32000	9500	
		333 DIAMOND BEACH RD	3800	19000	3800	650

Legend

Dist_Shops column = distance to nearest shops
Dist_Doc column = distance to nearest GP or medical practice
Dist_Medic doc = distance to nearest hospital

	Distances in red highlight is for 333 Diamond Beach Road, Diamond Beach
	Distances greater than walking distance but less than similar distances
	Distances in green highlight is for villages further from services than 333 DBR
	Distances in orange - Villages in comparable range (1800m - 3700m) to 333 DBR
	Medic in comparable range 10km to 19km

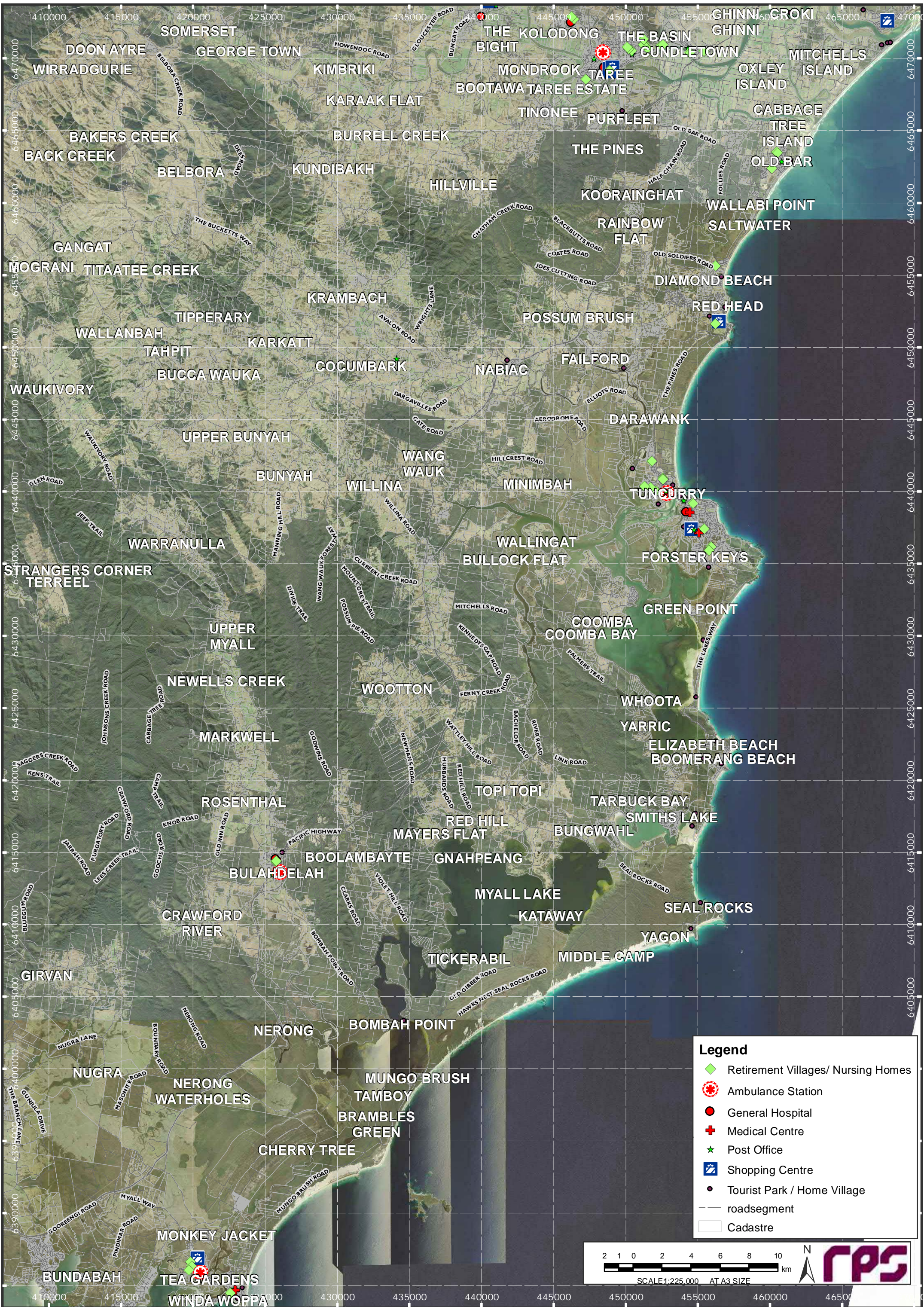
Walking Distance

This refers to a typical 10 minute (800 m) walk.

OBSERVATIONS

5 examples above
2 examples of villages further away than 333 DBR
3 examples of villages either further away from or in comparable range (1800m - 3700m) with 333 DBR to shops and medical services / GPs
4 villages further away than 333 DBR from hospital facilities

ATTACHMENT 2 – AERIAL PLANS



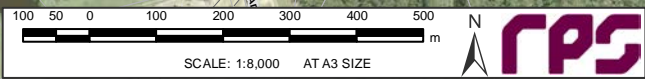


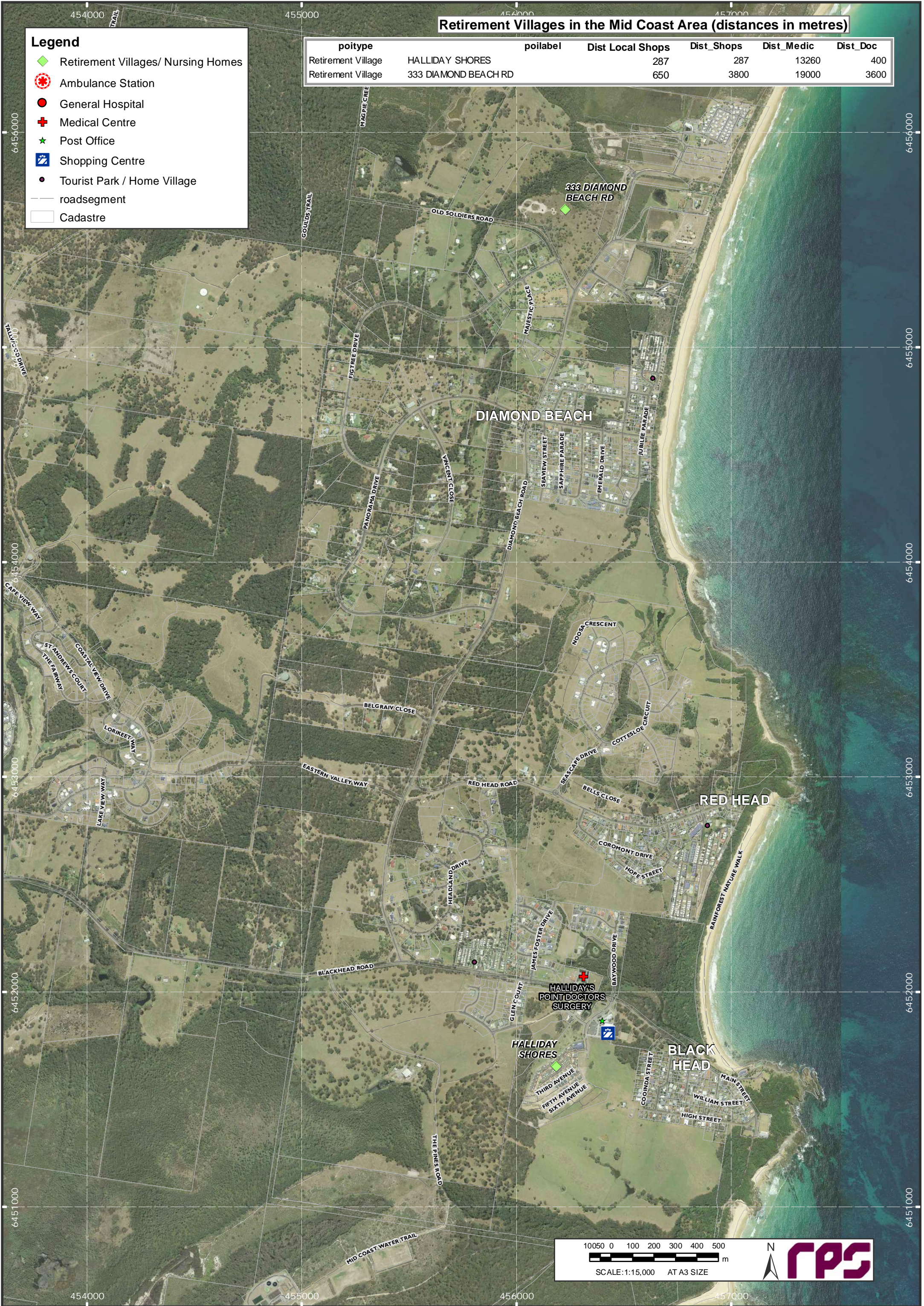
Retirement Villages in the Mid Coast Area (distances in metres)

poitype	poi label	Dist_Shops	Dist_Medic	Dist_Doc
Nursing Home	GREAT LAKES AGED CARE BULAHDELAH	880	133	133
Retirement Village	GREAT LAKES NURSING HOME	940	76	186

Legend

- ◆ Retirement Villages/ Nursing Homes
- ⚡ Ambulance Station
- General Hospital
- ⛶ Medical Centre
- ★ Post Office
- 🛒 Shopping Centre
- Tourist Park / Home Village
- roadsegment
- ▭ Cadastre





Retirement Villages in the Mid Coast Area (distances in metres)

poitype	poilabel	Dist Local Shops	Dist_Shops	Dist_Medic	Dist_Doc
Retirement Village	HALLIDAY SHORES	287	287	13260	400
Retirement Village	333 DIAMOND BEACH RD	650	3800	19000	3600

Legend

Retirement Villages/ Nursing Homes

Ambulance Station

General Hospital

Medical Centre

Post Office

Shopping Centre

Tourist Park / Home Village

roadsegment

Cadastre

10050 0 100 200 300 400 500

m

SCALE:1:15,000 AT A3 SIZE

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Retirement Villages in the Mid Coast Area (distances in metres)

poi type	poi label	Dist_Shops	Dist_Medic	Dist_Doc
Nursing Home	ESTIA HEALTH TUNCURRY	720	2500	720
Nursing Home	ESTIA HEALTH FORSTER	1800	3000	1300
Retirement Village	GOLDEN PONDS RETIREMENT RESORT	1900	3000	1400
Retirement Village	SUNRISE SUPPORTED LIVING TUNCURRY	2400	4200	2400
Community Home	GLAICA HOUSE	1000	2900	1000
Retirement Village	TUNCURRY LEGACY VILLAGE	1200	3000	1200
Retirement Village	GLAICA GARDENS	930	2800	930
Retirement Village	GLAICA LION'S VILLAGE	930	2800	930
Nursing Home	BAPTISTCARE KULAROO CENTRE	850	1600	440
Tourist Park / Home Village	CRYSTAL WATERS ESTATE	1500	3150	1570

Legend

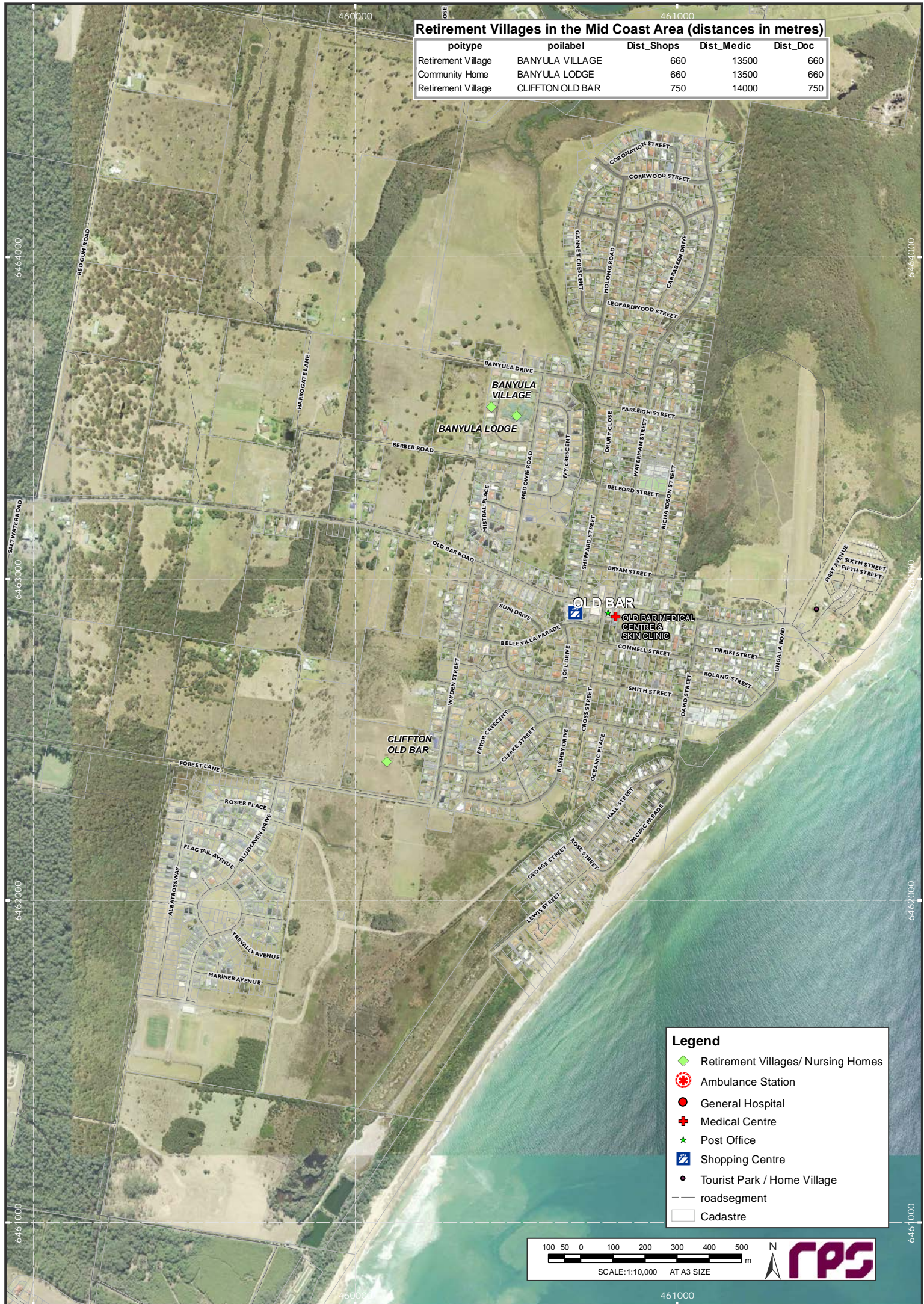
- ◆ Retirement Villages/ Nursing Homes
- ⚡ Ambulance Station
- General Hospital
- ⛶ Medical Centre
- ★ Post Office
- 🛒 Shopping Centre
- Tourist Park / Home Village
- roadsegment
- ▭ Cadastre

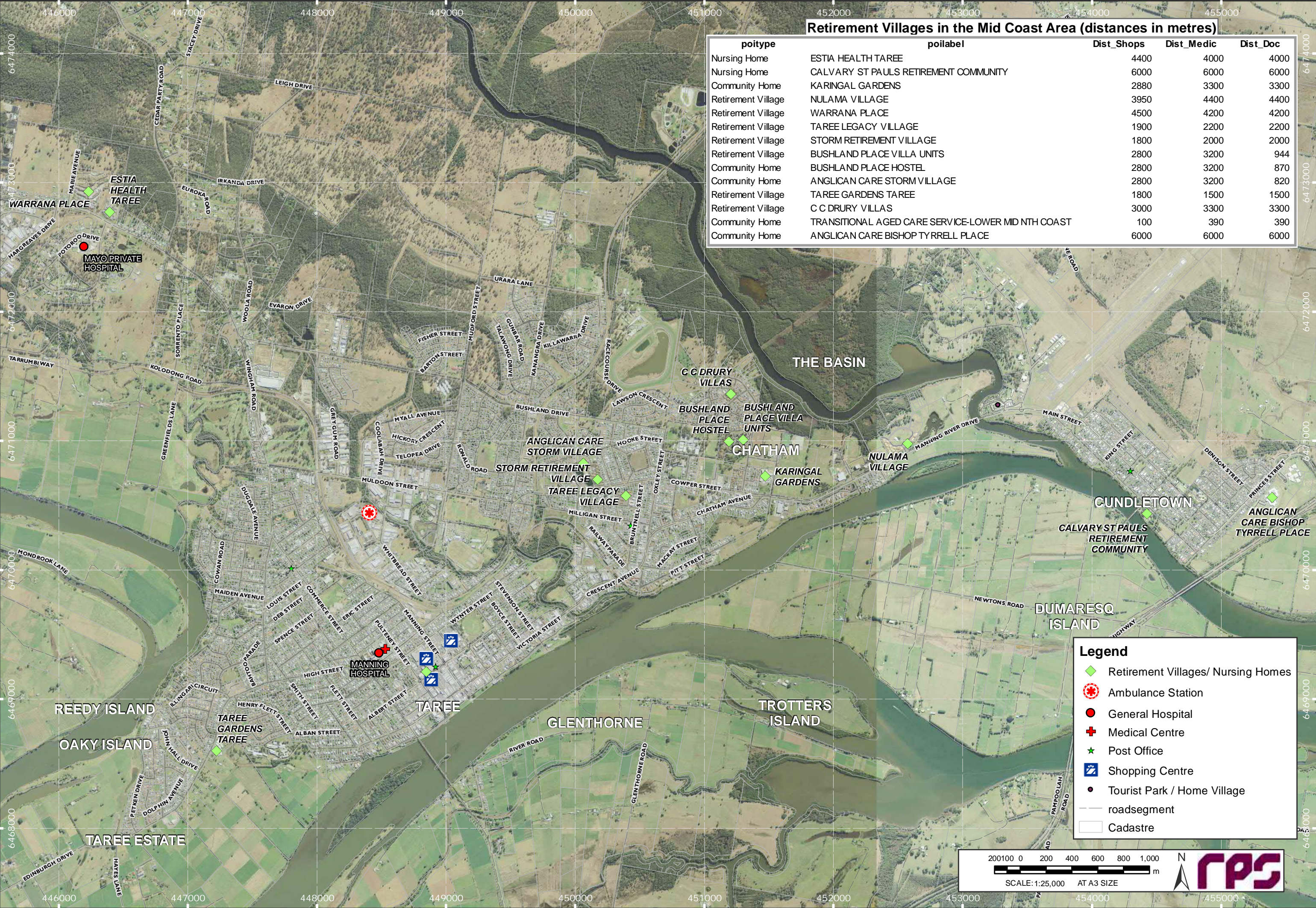
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SCALE: 1:22,000 AT A3 SIZE

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Retirement Villages in the Mid Coast Area (distances in metres)

poitype	poilabel	Dist_Shops	Dist_Medic	Dist_Doc
Retirement Village	BANYULA VILLAGE	660	13500	660
Community Home	BANYULA LODGE	660	13500	660
Retirement Village	CLIFFTON OLD BAR	750	14000	750





Retirement Villages in the Mid Coast Area (distances in metres)

poitype	poilabel	Dist_Shops	Dist_Medic	Dist_Doc
Nursing Home	ESTIA HEALTH TAREE	4400	4000	4000
Nursing Home	CALVARY ST PAULS RETIREMENT COMMUNITY	6000	6000	6000
Community Home	KARINGAL GARDENS	2880	3300	3300
Retirement Village	NULAMA VILLAGE	3950	4400	4400
Retirement Village	WARRANA PLACE	4500	4200	4200
Retirement Village	TAREE LEGACY VILLAGE	1900	2200	2200
Retirement Village	STORM RETIREMENT VILLAGE	1800	2000	2000
Retirement Village	BUSHLAND PLACE VILLA UNITS	2800	3200	944
Community Home	BUSHLAND PLACE HOSTEL	2800	3200	870
Community Home	ANGLICAN CARE STORM VILLAGE	2800	3200	820
Retirement Village	TAREE GARDENS TAREE	1800	1500	1500
Retirement Village	C C DRURY VILLAS	3000	3300	3300
Community Home	TRANSITIONAL AGED CARE SERVICE-LOWER MID NTH COAST	100	390	390
Community Home	ANGLICAN CARE BISHOP TYRRELL PLACE	6000	6000	6000

Legend

Retirement Villages/ Nursing Homes

Ambulance Station

General Hospital

Medical Centre

Post Office

Shopping Centre

Tourist Park / Home Village

roadsegment

Cadastre

200100 0 200 400 600 800 1,000

SCALE: 1:25,000 AT A3 SIZE

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