

Our Ref: 103/153  
Your Ref: SSC\_2019\_MAITL\_001\_00

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16 September 2019

Department of Planning Industry & Environment  
Hunter Region  
PO Box 1226  
NEWCASTLE 2300

Att: Ken Phelan

**RE: SITE COMPATIBILITY CERTIFICATE FOR SENIORS HOUSING AT 474 PHOENIX  
PARK RD BEING LOT 3 DP 807949**

I refer to your letter to Council dated 7 August 2019 requesting comments from Council on the consistency of the proposal with the criteria in clause 25(5) of the Housing for Seniors or People with a Disability SEPP.

Council has viewed the material supporting the application. The following comments are provided for your consideration in determining the consistency of the proposal with clauses 24(2) and 25(5)(b) of the SEPP.

Firstly, the Site Compatibility Certificate (SSC) application nominates a total of 40 serviced self-care dwellings, a community centre and associated site infrastructure as the proposed development. The supporting information submitted by the proponent identifies 46 serviced self-care dwellings. Clarification on this point needs to occur as a reduction by (6) six dwellings from the proposal would provide a more realistic, usable flood free space for farm implement storage and stock refuge for the RU1 zoned residue portion of land.

Strategic Context

1. The subject land is located within the agricultural corridor of the Hunter River, between the villages of Morpeth and Largs. The site is situated on the eastern edge of the older residential area of Largs and extends into the Hunter and Paterson River flood plain.

Whilst urban expansion is occurring in the Largs and Bolwarra Heights areas, this is mainly to the north and west. Suitably zoned vacant residential land is available in these growth areas to accommodate seniors housing development. The Greater Newcastle Metropolitan Plan 2036 and Maitland Urban Settlement Strategy do not identify urban growth in this direction. The issue of providing urban growth, in the form of seniors housing, in predominantly rural areas without having the benefit of

more holistic planning is an issue that has previously been raised by Council. The consideration of such proposals through a broader strategic context which properly considers and balances the various constraints and opportunities of the wider area needs to occur.

The proposal does not form a logical or direct extension to land zoned for urban purposes. Instead it would intrude into the rural landscape with only a minor connection point to residential land fronting Phoenix Park Rd.

Both the GNMP and MUSS direct future urban growth toward a more compact sustainable development outcome. This can be achieved through “infill” type development utilising existing infrastructure and increasing population around growth centres and transport nodes. The proposal deviates from this principle.

Sufficient residential zoned land is available Maitland for a development of this size to be situated, without having to resort to the issuing of a SCC.

#### Access/Traffic

1. It is noted that the application for the SCC addresses location and access to facilities through nominating site proximity to public transport routes and bus stops, providing access to Greenhills shopping precinct, Lorn and Central Maitland commercial precinct. Bus stops are located on High Street Largs, within the prescribed distances; however there are no formed or designated pedestrian linkages along Morpeth Rd or High Street to meet the required access standards identified in cl.26 of the SEPP. Compliance with the design and construction standards for the pedestrian path network would need to be demonstrated in detail as part of any future development assessment process. It is noted that a private bus service will be provided on site for residents to access wider services not located in the immediate locality of Largs, e.g. medical centre.
2. The subject land gains access from Phoenix Park Rd. The proposal, including the site layout, identifies six (6) residences gaining access directly from Phoenix Park Rd with no internal access provisions. The configuration of Phoenix Park Rd in this location is not conducive to this outcome or the proposed location of the main entrance/exit point for the proposal. A detailed traffic impact assessment is required and should include a traffic safety analysis with all dwellings gaining access from an internal road network.

#### Service Infrastructure

1. Whilst water and sewer infrastructure is available in the village of Largs, it has not been demonstrated whether there is sufficient capacity in the system to accommodate the proposal or whether the existing infrastructure can be feasibly extended to the site.

### Locality and Built Form

1. The supporting information has not adequately addressed the context of the proposal in the wider rural environment or potential land use conflicts. A more detailed visual and adjoining land use analysis is required.

### Conclusion

It is noted that the frontage of the site that adjoins the residential zone is only 60m of a total frontage of 190m to Phoenix Park Road, and that the area that adjoins the residential zone does not contain any buildings. This is due to the irregular shape of the lot. Attachment A illustrates this.

Council has previously raised such concerns with the Department regarding the inappropriateness of such development on productive agricultural land, achieved merely through the site being located in proximity to an existing residential area. These concerns extend to the suitability of Largs as a supportive commercial centre, given the limited services, and the poor public transport connectivity to other areas.

It is also noted that the site is not identified by Council for inclusion in the Maitland Urban Settlement Strategy, and would likely not be supported for a rezoning to residential purposes.

Given the above, Council has significant concerns regarding the impacts of Site Compatibility Certificates in general in the LGA. However, if the SCC is supported then the following should be noted:

Detailed site studies pertaining to the following will need to be submitted with any development application for the site:

- Traffic Impact Assessment
- Stormwater Management Plan
- Contamination Report
- Site and building design details addressing compliance with the design criteria of the Housing for Seniors or People with a Disability SEPP
- Visual Impact Assessment
- Servicing Strategy
- Land use conflict analysis

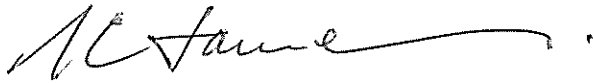
Council wishes to advise that in addition to the above, clarification on the number of dwellings proposed, re-configuration of the site layout to ensure all dwellings have internal

access and a larger flood free stock refuge/implement storage areas are required to be provided.

Additional information and reports pertaining to the above listed issues will need to be addressed as part of any future development application for the site.

Should you require any additional information or wish to discuss the matter further please contact Council's Mark Roser on 49349848.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris James', with a long, sweeping horizontal line extending to the right.

CHRIS JAMES

ACTING GENERAL MANAGER