

Your Ref: IRF18/85

19 February 2018
Catherine Van Laeren
GPO Box 39 Sydney 2001

Attention: Ryan Klingberg

Dear Ms Van Laeren

SITE COMPATIBILITY CERTIFICATE UNDER STATE ENVIRONMENTAL PLANNING POLICY (HOUSING FOR SENIORS OR PEOPLE WITH A DISABILITY) 2004 - 121-133 PRAIRIE VALE ROAD, BOSSLEY PARK (150 DWELLINGS)

Council is writing in response to application IRF 18/85 for a site compatibility certificate for Lot 7 DP 664803, Lot 5 Sec B DP 6934, Lot 6 Sec B DP 6934, Lot 3B DP 407243, 121 – 133 Prairie Vale Road, Bossley Park under State Environmental Planning Policy (Housing for seniors or people with a disability) 2004.

Council has referred the application internally to the relevant departments including Environmental Management, Environmental Health, Social Development, Traffic and Waste Services. The comments from each department are provided below.

Strategic Land Use Planning Comments

The site is zoned RE2 Private Recreation. Seniors housing (other than dual occupancies) is permitted on "*land that is used for the purposes of an existing registered club*" under clause (1) (a) ((iii)) Section 24 Chapter 3 Part – 1A of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.

The development is proposed to take place in Part Lot 7 DP 664803 to the North East of the site. Currently the site contains a multi deck car park which will be demolished for 150 self – contained dwellings within multiple buildings ranging in height between 10 to 20 metres.

Council understands that this proposal sits within a broader framework of redevelopment of Club Marconi. On Friday 17 November 2017 Council met with representatives of Club Marconi. The meeting detailed 4 stages regarding the master planning of the club site including:

Stage 1 – Aged Care Housing development to provide 150 independent living units;

Stage 2 – Creation of a new defined food and beverage precinct over ground level and first floor area of existing club building;

Stage 3 – Hotel building comprising 230 rooms over 6 levels which will be located above the existing club building including conference spaces;

Stage 4 – Sports precinct which is proposed to include an aquatic centre medical centre, pharmacy and child care expansion.

A SCC is required to have regard to Clause (5) (b), (i), (ii), (iii), (iv), (v), (vi), of chapter 3 part 1A SEPP (Housing for seniors or people with a disability) 2004 prior to Director General Approval.

Council officers' have undertaken a desk top assessment in relation to the above requirements and notes the following:

- The site is not bushfire prone;
- It is not affected by overland or main stream flooding;
- The site is not located on or within proximity to a heritage item;
- The site is not located within a heritage conservation area;
- The site is not subject to geotechnical land slip;
- The site does not contain ecologically endangered communities or species;
- The site is not within a SEPP 44 Koala habitat.

Clause (1) (a) (i) chapter 3 part 1A SEPP (Housing for seniors or people with a disability) 2004 stipulates that the land must adjoin land primarily for residential purposes. It is noted that the surrounding land uses are residential accommodation zoned R2 Low Density Residential.

Council officer recommendations: Council notes that this SCC is looking at stage 1 aged care facility in isolation. Clause 7 chapter 3 part 1A SEPP (Housing for seniors or people with a disability) 2004 stipulates that, *"A certificate may certify that the development to which it relates is compatible with the surrounding land uses only if it satisfies certain requirements specified in the certificate."*

It is noted that the Applicant lodged a *"Proposed Seniors Housing Design Package"* as there are no FSR controls for the site under Fairfield LEP 2013 and the current RE2 zoning did not anticipate a development of the extent identified in the design package. A master plan which identifies the cumulative impacts of the developments proposed on the site (club expansion, seniors housing, aquatic centre, pharmacy and associated parking and landscaping) should be prepared prior to the lodgement of the development application with Council. This would allow the master plan to be reported to Council and for it to provide guidance in lieu of development standards.

Subject to the above clause Council would request that the department considers conditioning that a detailed urban design master plan for the site be prepared and submitted with any future development application for stage 1. This will ensure that the future redevelopment of Club Marconi is guided and held accountable to established development controls and urban design principles. This will ensure a better development outcome for the community. SEPP 65 would apply to any future development onsite. Any future development application would have to ensure compliance with Schedule 1 Design quality principles of SEPP 65.

Environmental management comments

The site adjoins Marconi Park zoned RE1 Public Recreation Lot 3 DP 1022782. The site contains Downy Wattle *Acaia Pubescence*, Shale Plains Woodland and Shale Hills Woodland. These are classified as endangered species under the Biodiversity Conservation Act 2016.

Council officer recommendations: Council would request that any subsequent Development Application be accompanied by a detailed ecological assessment under the Biodiversity Conservation Act 2016 and a detailed landscape plan that ensures a landscape buffer between the eastern boundary on Part lot 7 DP 664803 and Marconi Park. The plant species should be native species endemic to the locality. This will provide support to the Endangered Ecological Communities within Marconi Park.

Traffic comments

The traffic report prepared by The Transport Planning Partnership (TTPP) has been reviewed and the following comments are provided:

The applicant has undertaken a parking survey to analyse the capacity of the existing club car park within the Marconi Club on a Friday and Saturday afternoon. The club has a total car parking supply of 1,681 spaces. Based on the surveys, the club has reached a maximum car parking capacity of 57% (959 occupied spaces) during 8.30pm on a Saturday.

State Environmental Planning Policy (SEPP) 2004, Chapter 3 Development for Senior Housing, has a parking rate of 0.5 spaces for each bedroom for a self-contained dwelling. This will require the provision of 143 car parking spaces. The applicant is proposing 144 new car parking spaces for the senior housing. Also, the applicant has advised that the visitors to the senior housing can use the car parking spaces allocated for Club Marconi.

Council officer recommendations: Council raises no objections to visitors using the car parking spaces of Club Marconi. The traffic generated by the proposed senior housing during the peak hours will be 60 vehicle trips during the peak hours. It is considered that this trip generation will not have any impacts on the adjacent road network. Any subsequent development application shall provide adequate disabled parking spaces and comply with Schedule 3 of SEPP 2004 during the separate development application stage.

One scenario which has not been tested in the traffic survey is large events on game days which may result in more car parking spaces being utilised as a result.

Community development comments

Higher density – up to 7 stories is concerning for older people as ageing can come with reduced mobility. Whilst we appreciate lifts will be available what happens to frail older or disabled older people in the event of an evacuation. Access can be an

issue in higher density developments as well for care staff entering and leaving a multi-story building and having access to onsite parking.

Proximity to the Marconi club: It is noted that the Marconi club provides services and activities for its older members. It has a thriving social program and also experience in providing for its existing seniors community. Its low cost accessible meals are a positive feature. However the club has both a poker and gaming room and will provide easy access to gambling options for the housed community.

Proximity to transport: It is noted that a bus service is available on Prairie Vale road, some 400 metres from the furthest point in the proposed housing development. A pathway is available to access this bus stop through the grounds of the club and one of the bus stops is outside the gate. However the other stop is across the road and there does not appear to be any pedestrian measures for crossing. Consideration on how the older residents will access this is required at DA stage. It is also noted that the incline is referred to as relatively level walk however this could be challenging to an older frailer person.

As the housing development is located on the northern side of the site it is essential that an internal pathway is provided within the site connecting to the 817 bus stop on Prairie Vale Road. Access along existing streets does not provide readily accessible distances to the bus stops.

Proximity to open space: the proposed plans for the site include additional plantings and access for residents to an Environmental conservation area. It is appreciated that the residents have access to Orphan Creek and the Western Sydney Parkland but these are not short walking distances for older residents.

The planned inclusion of a landscaped open space on the future podium level will provide areas for older residents to enjoy the open space and meet. It would be hoped that seating and shade would be included in this space. It is also noted that whilst the housing is located within the grounds of Marconi's ovals, and some units will have views over these ovals the activities of these ovals would not be senior based.

Fairfield has an ageing population and the Bossley Park area has 30% of the population over 55 years. An option to live within their community in independent housing is important and this development will meet a community need of ageing in place. Anecdotally people want to live near their families and downsizing within the local area would meet this need.

There is mention in the submissions about the unit layout, 30 x 1 bedrooms, 105 x 2 bedrooms and 15 x 3 bedrooms. There is no provision for higher care needs of residents although it appears the earlier development of aged housing catered for a mix of needs. It is noted a higher care facility on the Horsley Drive is currently in for DA consideration by Council.

Council officers' recommendations: Councils Community Development section raises concerns in relation to access to public transportation (bus services),

proximity of the aged to gambling services and aged care compatibility of the building design.

It is noted that within SEPP (Housing for seniors or People with a Disability) 2004 separation must be provided between the club and residential portion of a site and that they cannot be linked. This needs to be clearly outlined in the SCC.

Council raises no objections to the proposed development subject to the above concerns being dealt with during the master planning and DA stage.

Environmental health comments

Documents submitted in support of the proposal include the Preliminary Contamination and Salinity Report dated 19 October 2017 prepared by Ground Technologies Pty Ltd.

Council officers concur with the conclusions and recommendations contained within the report. The initial results indicate a low risk of wide spread contamination as all samples taken were below the Health Investigation Levels (HIL) for all four different exposure settings.

In addition also supported is the recommendation that an additional detailed investigation be conducted to determine the full extent of contamination within the areas known to have imported fill, in particular around borehole BH5 where potential asbestos contamination was observed. Therefore the site would be suitable for its intended use of seniors housing.

Waste Services

There will be a significant increase in the traffic for waste collection (including garbage and recycling) in the area. An estimate of additional 31,000 L of waste and recycling per week is anticipated for the proposal.

If the units are operated under the same RE2 zoning and no Strata title, then these units will be serviced as commercial waste meaning that Waste and Recycling services can be serviced by a contractor onsite without Council involvement.

If the units are Strata title, then these units should be serviced as domestic waste with waste levy. Kerbside collection will be provided (including garbage, recycling and bulky waste). There will be significant numbers of bins to be presented at the kerbside for collection. This would not be supported by Council and would affect the Club operation. A Waste Management Plan must be developed for the DA.

Conclusion

Council generally raises no objection to the proposal subject to the issues raised by the relevant internal departments of Council being dealt with at the DA stage or conditioned as part of the Site Compatibility Certificate Approval.

As discussed it is recommended that the SCC be conditioned for an urban design master plan to be submitted to Council prior to the lodgement of a development application to guide the staged redevelopment of the site i.e. stages 1 through 4 in lieu of existing development standards.

If you have any questions in relation to this please do not hesitate to contact me on 9725 0215.

Patrick Warren
STRATEGIC LAND USE PLANNER

