

31/07/2019

NSW DEPARTMENT OF PLANNING, INDUSTRY AND ENVIRONMENT  
ATTN: MS MONICA GIBSON  
PO BOX 1226  
NEWCASTLE NSW 2300

Dear Ms Monica,

**RE: Application for Site Compatibility Certificate – SCC\_2019\_PORTS\_001\_00 at Muree Golf Club, 7 Walker Crescent, RAYMOND TERRACE NSW**

Reference is made to the abovementioned application for a Site Compatibility Certificate in accordance with *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004*. The Department has requested Council's comment relating to the criteria set out under Clause 25(5)(b) of the SEPP. Council has considered the application and provides the following general information regarding the site and its suitability for the Department's consideration.

*(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,*

Based on the information provided, the proposal would have an impact on the natural environment, however, this could be managed through the development application process. The site is located on the Biodiversity Values Map, triggering the Biodiversity Offsets Scheme. A Biodiversity Development Assessment Report (BDAR) prepared by an accredited assessor in accordance with the Biodiversity Assessment Methodology will need to be prepared and submitted with any future development application. Any future development application will need to address the performance criteria in Appendix 4 of the Port Stephens Comprehensive Koala Plan of Management.

The proposed development site forms part of the Muree Golf Club in Raymond Terrace and is identified as bushfire prone land (category 1 and 2 vegetation and buffer). The bushfire threat is considered able to be addressed as part of any future development application and should not impede the use of the site for senior's housing.

*(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,*

The Draft Port Stephens Demographic and Housing Overview Report identifies Raymond Terrace as a significant growth area for Port Stephens. Raymond Terrace has an ageing population and is forecasted to experience potential land supply constraints in the short to mid-term future. This proposal will respond to the future demand for seniors housing.

Council's Raymond Terrace and Heatherbrae Strategy (RTHS) indicates the suitability of Raymond Terrace in providing seniors living and affordable housing due to its ageing population, affordable land and existing social infrastructure and services. The strategy identifies Raymond Terrace as a major regional centre, forming part of the primary growth corridor with an infill development potential of 800 dwellings. The proposal is located within an infill future growth area for Raymond Terrace. The strategy encourages medium density housing in the immediate vicinity of the regional centre of Raymond Terrace to support medium and higher density residential development. The proposal is consistent with the strategy and meets the 6 principles developed to guide the location of medium density housing (p 84).

Council considers the site suitable for use as senior's housing development. The proposal would retain the operations of the existing Muree Golf Club's operation and would not impact upon the continued and future use of the residue land for private recreation purposes.

*(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,*

The proposed location is on the periphery of the Raymond terrace Town Centre and forms part of the existing low and medium density residential area. The site is located approximately 1000m from the major retail precinct of Raymond Terrace. This area provides for general shopping, banks, community, recreation and health service facilities.

The site is approximately 400m from an existing bus stop which provides services to the Raymond Terrace Town Centre. However, there is currently no footpath linkage. A connecting footpath between the proposed seniors living development and the bus stop would be required as part of any future development application. An assessment and subsequent upgrade of the existing public bus stop on Mount Hall Road, to comply with current Disability Standards for Accessible Public Transport requirements, would also be necessary as part of any future development application in accordance with the requirements of the SEPP.

Any future development application must also provide an impact study to determine the impacts associated with stormwater drainage, stormwater water quality, flooding and traffic. The applicant would need to address stormwater conveyance by identifying flow paths, infrastructure capacity, concept designs for drainage lines and identifying the legal point of discharge. As the golf club sits across a number of independent lots an easement may be required over downstream golf course lots to allow for concentrated discharge of stormwater over these lands.

The above matters are considered standard requirements for such developments and are not an impediment to the future development of the land. Council considers the site suitable for use as senior's housing development.

*(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,*

The proposed location is zoned RE2 – Private Recreation In accordance with the Port Stephens Local Environmental Plan 2013 (PS LEP 2013). The proposal occupies the northern most portion of the 36 hectare Muree Golf Club Site, representing a minimal impact to the land utilised for recreational purposes. The existing golf course is to be retained and the proposal would not impact on the use of this area. The site adjoins Boomerang Park and the potential use of the subject site for seniors housing will not compromise the public use of this area.

*(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,*

The proposal is a form of medium density housing and it is noted that the proposal includes a maximum height of 15.5m. The subject land does not currently have a Height of Building Restriction land under the PS LEP 2013, which is typical of sites zoned RE2 Private Recreation where residential accommodation is not permitted. While it is acknowledged the surrounding R2 Low Density Residential and R3 Medium Density Residential zones are subject to a 9m height of building restriction, Action 15 in the RTHS (p. 28) proposes to increase height limits in medium density areas to 15m. The plan also aims to increase medium density development within Raymond Terrace and the proposal is consistent with this approach.

Despite the RTHS, consideration must be given to impact on existing uses of land in the vicinity of the development. Block A and B interface with the existing Low Density Residential areas to the north. The overall bulk and scale of the proposed built form is not sympathetic to the existing surrounding area which is characterised by low density housing. Block A and B, which include a proposed maximum building height of 12.4m present privacy issues from overlooking of the private open space of residential dwellings on Muree Street to the north.

Impacts to the built environment for stage 3 of the proposal are limited by the adjacent Council Depot. However, the proximity to Council's depot may present issues relating to noise and dust. Increased setbacks may serve to mitigate these impacts. Council would expect the inclusion of an acoustic Impact Assessment and details of building design treatments as part of any future development application.

Impacts relating to the bulk, scale, built form and character of the development would be further assessed as part of any future development application.

*(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.*

The proposal would include the clearing of native vegetation, however, it is considered that this could be managed through the development application process.

### *Conclusion*

In summary, Council is supportive of additional senior's housing within the Local Government Area and sees no impediment for the use of the subject site for such a purpose. The future development of the site would be subject to the development assessment process at which point full consideration of the overall development and potential impacts will be undertaken. Council considers that the proposal is compatible with the site and surrounding land uses.

Should you have any further enquiries or wish to discuss the above, please do not hesitate to contact the undersigned.

Yours faithfully



DYLAN MITCHELL  
SENIOR DEVELOPMENT PLANNER  
PORT STEPHENS COUNCIL

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