

8 November 2017

15666

The General Manager
Georges River Council
PO Box 205
Hurstville NSW 2220

Attention: Ms Meryl Bishop

Dear Ms Bishop,

73 Vista Street San Souci – Planning Proposal

We refer to the above matter on which we act for the applicant, Nanevski Developments.

We understand that Council Officers intend to present a report to the Council Meeting on 9 October 2017 recommending the Planning Proposal not be supported.

As you are aware the Planning Proposal was presented to Council's Design Review Panel (DRP) and subsequently referred to Council's Independent Hearing and Assessment Panel (IHAP) before we were able to lodge an amended scheme that responded to the DRP comments.

Development Options

We acknowledge Council's concerns and the issues raised by the DRP with the Height and Floor Space and note that the amendments to the Foreshore Building Line and the Zoning are supported by Council Officers.

The options available for development of the site under the current planning controls with the amendments supported by Council Officers are:

2-3 Detached Dwelling Houses @ 0.533:1 FSR;

4 Attached Dual Occupancy Houses @ 0.430:1 FSR; or

10-12 Seniors Housing Units @ 0.5:1 FSR.

Given the extraordinary amenity of the site on the waterfront and the very high value of land in this location it is likely that options for individual dwelling houses would present as a significant built form. The site is of sufficient scale to permit subdivision for up to four dwellings which would result in development at the lower waterfront and higher street contours. This form is evidenced by recent development at 65 and 67 Vista Street.

Development for the purposes of seniors living is permissible under Council's LEP and the Seniors SEPP. Seniors housing must generally be presented at a discount to the general local housing market, be of a superior quality, and must also offer seniors living services to be an attractive option and to encourage the turnover of local housing stock.

A compliant senior housing development could take the form of either single storey villas or two storey apartments. Villas do not present a viable development option for the site given the underlying value of the land. Two storey apartments present a substandard design response to the local market given that elevators and basement carparking would not be a viable option for development at this scale.

It is also significantly more costly to develop to comply with the additional building standards required for seniors housing. In addition the consumer protections afforded seniors housing purchasers, such as extended contract termination periods and "settling-in" periods, present a greater settlement risk profile for property developers.

A compliant scheme presents a subordinate development option and the development of the site for standard housing provides greater certainty and viability.

Proposed Development

We enclose an amended urban design concept that reduces the scale of the proposal from the street and the waterway commensurate with the likely outcome for the site had it been subdivided and developed for detached waterfront houses.

The amended proposal significantly reduces the number of units and presents as two building forms to the street and to the waterfront. The front setback has been increased and is further increased to retain a greater setback to the existing tree. Additionally the setback to the upper floors has been increased such that when combined with the steep topography of the site, the building now presents as a two storey form to the street.

The side setback to the adjacent property on the northern boundary has been increased to six metres increasing opportunities for views of the water from the street and the dwelling houses across Vista Street. We note that the existing dwelling house provides very little view to the water and a complying proposal for detached dwellings would almost certainly obliterate any view corridor as has been the case with other development on Vista Street.

The side setback to Anderson Park has also been increased to five metres to provide for significant tree planting to this boundary that will provide screening to the development and supplement planting within the park. The upper floors on this side of the building have also been setback to provide balconies that address and overlook this park.

The building form fronting the waterfront has been significantly reduced and articulated as two distinct forms. They are provided as a series of terraces that reflect the topography of the site and enable landscaping at the edges that will soften the building. This form, particularly when viewed from the foreshore on the opposite bank of the bay, presents similarly

The amended scheme balances the critical mass required to provide seniors living services such as an on-site caretaker, communal meeting room and on-site services with an urban form that is not dissimilar to standard housing on the site and is an appropriate response to the waterfront, streetscape, and topography.

Seniors Living Services

The proposed development intends to provide a superior level of seniors living amenity including personal care services, indoor communal recreation room and swimming pool. The ability of seniors living developments to include these services is directly related to the scale of the development scheme.

We have reviewed the available seniors housing in Sydney to gauge the critical mass for these types of seniors living services. Seniors housing developments with these facilities are usually significant in scale as indicated in Table 1 with approximately 80 dwellings being the typical minimum.

Table1- Seniors Housing with Comparable Facilities

Development	# units	Development	# units
Belrose Country Club	200	Baldwin Lane Cove Gardens, Retirement Village, Lane Cove	83
Macarthur Gardens	206	The Landings, Retirement Village, North Turramurra	220
Windsor Gardens Chatswood	84	Constitution Hill, Retirement Village, Northmead	437
Lifestyle Manor Bondi	84	Beauty Point Resort, Retirement Village, Padstow Heights	148
Castle Ridge Resort, Retirement Village, Castle Hill	114	St Stephens , Retirement Village, Penrith	60
Willandra Village & Bungalows, Retirement Village, Cromer	358	Greglea, Retirement Village, Penshurst	81
Living Choice Glenhaven, Retirement Village, Glenhaven	236	Woolooware Shores, Retirement Village, Taren Point	228
Glenhaven Green, Retirement Village, Glenhaven	84	Queens Park Assisted Living at Waverley, Retirement Village, Waverley	42
Donald Robinson , Retirement Village, Kirrawee	120	Goodwin, Woollahra	172

Source: <https://www.villages.com.au> and <https://www.seniorshousingonline.com.au>

Notwithstanding the design implications of a complying development the facilities presented by the proposed development require a significantly greater dwelling yield than a compliant development could present if support facilities are to be provided.

Given the critical shortage of seniors housing in the Georges River LGA it would be disappointing for Council to prematurely determine the Planning Proposal on the basis of the current scheme which has not had the benefit of amendments to respond to the DRP.

We therefore respectfully request that Council staff withdraw consideration of the Planning Proposal from the meeting of 9 October 2017 pending an assessment of the amended design scheme.

Alternately, if Council is of a mind to proceed to making a decision on the Planning Proposal, we respectfully request that Council amend the recommendation to support the proposed changes to the Foreshore Building Line and the Zoning, and forward the Planning Proposal to the delegate of the Greater Sydney Commission for a Gateway determination.

If you have any questions regarding the above information do not hesitate to contact me on 0419 845 089 or by email at ncroft@ethosurban.com.

Yours sincerely,



Nathan Croft
Associate Director