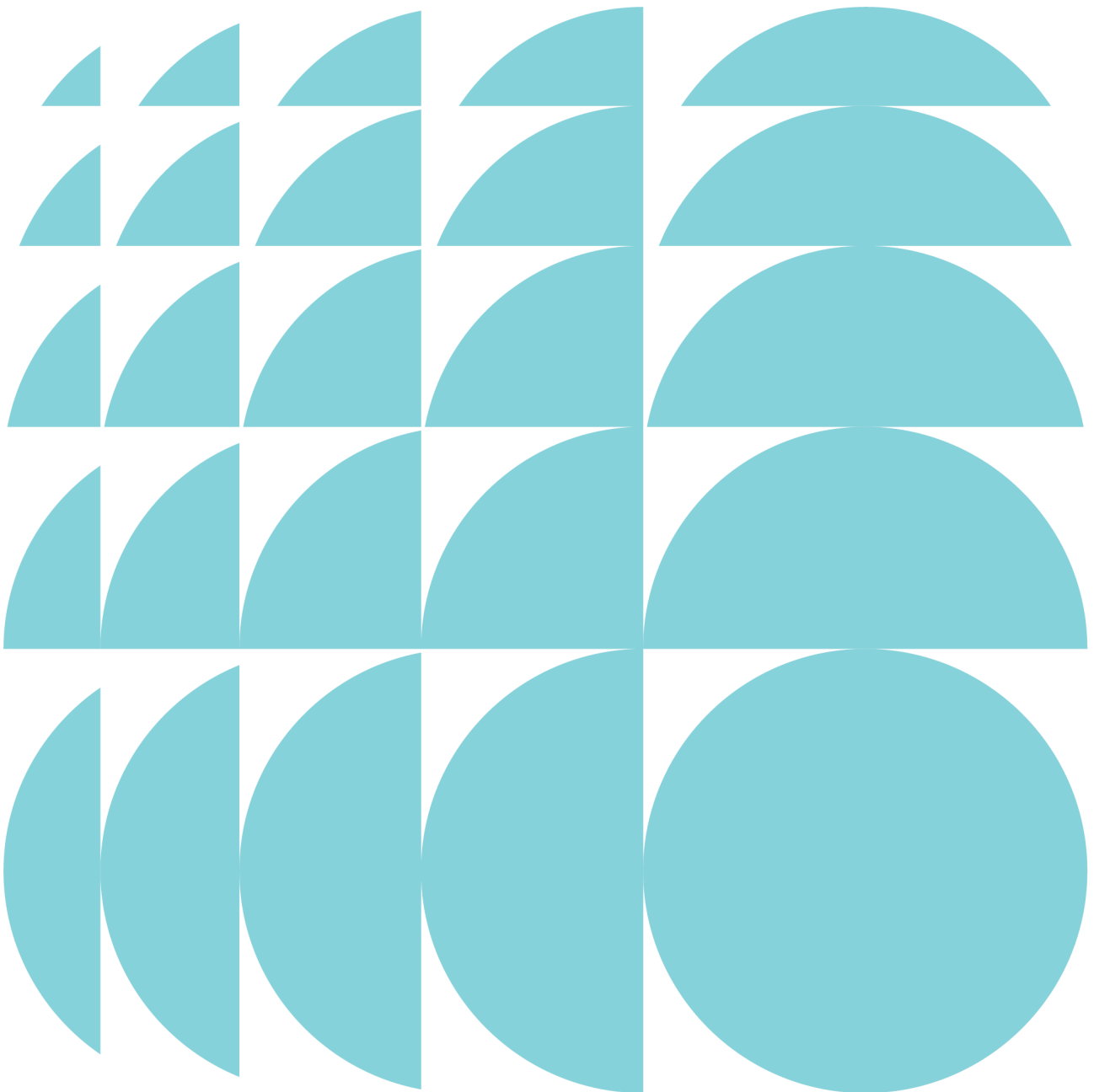


55 Fox Hill Crescent, Prospect  
Seniors Development

Submitted to Blacktown City Council  
On behalf of Integrated Projects Pty Ltd

13 April 2021 | 218967



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## 1.0 Introduction

This Site Compatibility Certificate (SCC) application has been submitted to the NSW Department of Planning, Industry and Environment (DPIE) to demonstrate compatibility of the proposed development of part of the Site at 55 Fox Hills Crescent, Prospect (the Site) for the purposes of seniors housing. The site is currently being used as the Fox Hills Golf Course, which will be reconfigured to allow the proposed development.

This SCC application has been prepared in accordance with the provisions of Clause 25 of the *State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004* (Seniors Housing SEPP). The purpose of the SCC application is to facilitate the preparation of a Development Application (DA) lodged with Blacktown Council City housing for seniors, in addition to a concurrent development application for the reconfiguration of the golf course and associated works.

This SCC application describes the Site, its environs, the proposed development concept, and demonstrates that development for the purposes of seniors housing is compatible with the surrounding land uses, having regard to the criteria specified in Clause 25(5)(b) of the Seniors Housing SEPP. This SCC document has been prepared to address the relevant matters and is supported by various technical studies.

This SCC has been prepared by Ethos Urban on behalf of Integrated Projects Pty Ltd and should be read in conjunction with the information contained within and appended to this report (see Table of Contents).

## 1.1 Background

This project is a result of an overall strategy for the revitalisation of the existing Fox Hills Golf Club to ensure the long-term sustainability and ongoing viability of the golf course and club. The Fox Hills Golf Club was established in 1964 under private ownership and it has been open to the public since its inception, becoming an important community asset.

The Fox Hills Golf Course is competing with others in the area to retain and attract membership to maintain business. Maintenance of the 18-hole golf courses is expensive, and playability is highly weather dependant, meaning the course is often closed during times of heavy rain. In more recent times, the economic viability of the club has declined due to the COVID-19 pandemic turnaround and with the course also requiring sustainable upgrade works to keep it a competitive and high-quality golf course.

The proposed strategy is a long-term solution to the club's financial feasibility to facilitate a seniors housing development on a portion of the golf course. The proposal will allow Fox Hills the opportunity to invest resources into improving the quality of the golf course, thereby ensuring its attractiveness and viability into the future.

## 1.2 The Proposal

As noted, this SCC application relates to the proposed seniors housing development at 55 Fox Hills Crescent, Prospect. The proposed development is located at the Fox Hills Golf Course, however, is limited to the south western corner of the site, as shown at **Figure 4**.

Specially, the proposal is for a seniors housing development comprising 14 buildings which include:

- 403 independent living units (serviced self-care housing) including:
  - 90 one-bedroom apartments.
  - 246 two-bedroom apartments.
  - 67 three-bedroom apartments.
- The provision of 475 car parking spaces within basement car parks (and 74 on-street parking spaces).
- Associated amenities including spaces for the delivery of following services are available on the site: meals, cleaning services, personal care, nursing care.
- Site works, landscaping, and public domain works.

### **1.3 Pre-Lodgement Consultation**

On 3 March 2021, the applicant and the project team met with DPIE during design development of the current proposal to discuss the overall vision for the site, including the SCC application. Key matters raised during that meeting included:

- Vehicle access and egress.
- Landscaping and vegetation.
- The proposed interface between the Golf Course and seniors housing development.
- Public transport and pedestrian access in accordance with the Seniors Housing SEPP.

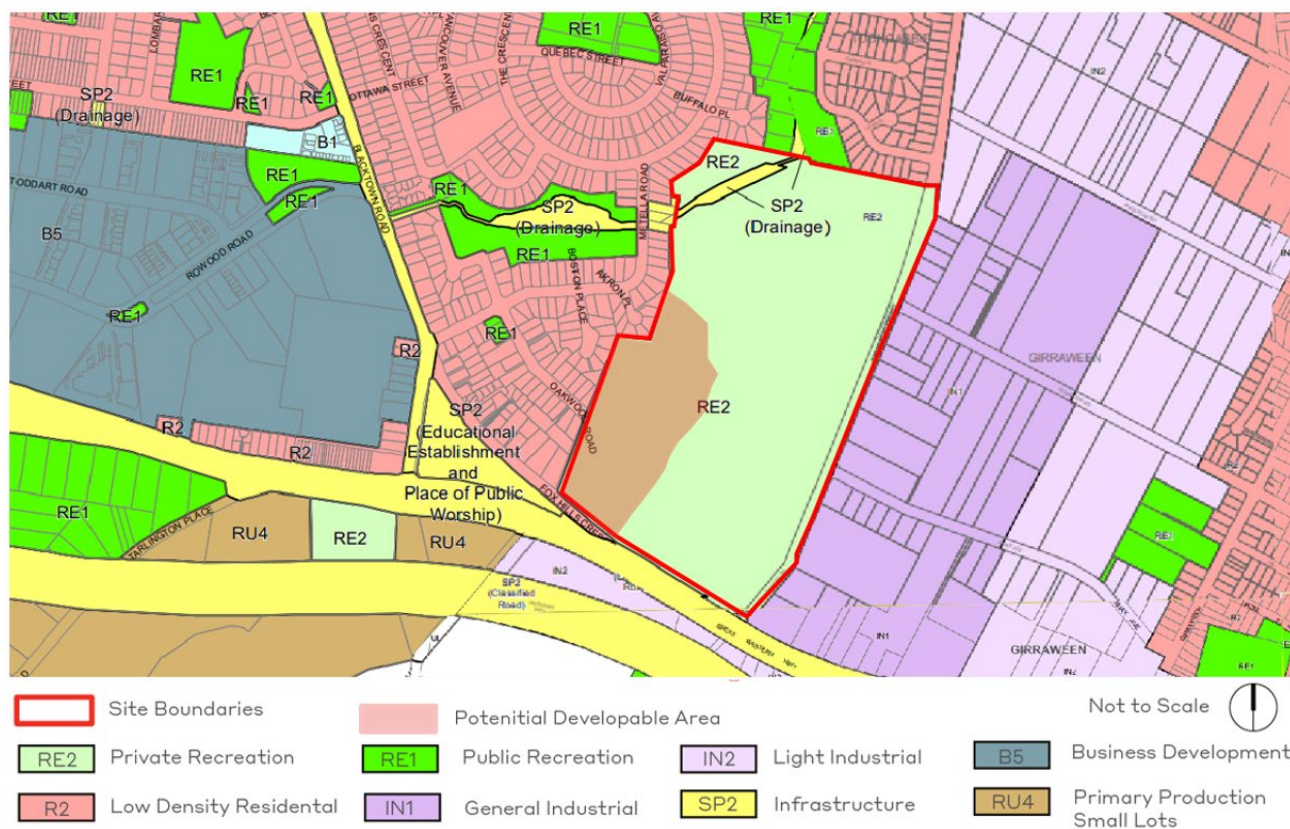
These matters have been addressed throughout this report and are supported by accompanying technical information.

The applicant also met informally with key members of Blacktown City Council staff prior to meeting the DPIE to discuss the broader intent of the proposal. All items raised in the meeting have been addressed in the specialist reports to support this application.

## 2.0 Planning Context

### 2.1 Blacktown Local Environmental Plan 2015

The *Blacktown Local Environmental Plan 2015* (Blacktown LEP) is the primary local environmental planning instrument controlling development on the site. The site is zoned RE2 Private Recreation under the Blacktown LEP. A zoning extract is shown at **Figure 1**.



**Figure 1 Land Zoning Map**

Source: Blacktown Local Environmental Plan / Ethos Urban

The relevant planning considerations under the Blacktown LEP are listed below in **Table 1**.

**Table 1 Planning Considerations Under the Blacktown LEP**

Control	Blacktown LEP
Zone	RE2 Private Recreation
Zone objectives	<ul style="list-style-type: none"> <li>To enable land to be used for private open space or recreational purposes.</li> <li>To provide a range of recreational settings and activities and compatible land uses.</li> <li>To protect and enhance the natural environment for recreational purposes.</li> </ul>
Permissible uses in the B5 zone	Aquaculture; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Educational establishments; Environmental facilities; Environmental protection works; Flood mitigation works; Function centres; Hotel or motel accommodation; Information and education facilities; Kiosks; Pubs; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Respite day care centres; Restaurants or cafes; Roads; Water reticulation systems.
Prohibited Uses in the B5 zone	Any other development not specified in Item 2 or 3.



Control	Blacktown LEP
Maximum Height Control	Maximum building height control does not apply to majority of the Site. The eastern section of the Site (outside of that part of the Site proposed to be developed) is subject to a 10m maximum building height control.
Maximum FSR Control	An FSR control does not apply to the Site

## 2.2 State Environmental Planning Policy (Infrastructure) 2007

Clause 104 of the State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP) relates to traffic generating development. It is applicable to traffic generating developments that exceed the relevant dwelling capacity for a site with access to a road or classified road listed in Schedule 3.

Under the provisions of the Infrastructure SEPP, the proposed development will trigger the criteria in terms of numbers of dwellings prescribed in Schedule 3, Columns 2 and 3 – being Residential accommodation that delivers 300 or more dwellings. Therefore any subsequent DA for the detailed design of the proposal would be referred to Transport for NSW (TfNSW).

## 2.3 State Environmental Planning Policy No. 55 – Remediation of Land

SEPP 55 promotes the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. The SEPP specifies when consent is required for remediation work.

A Preliminary (Stage 1) Site Investigation has been prepared by JK Geotechnics and is provided at **Appendix G**. Contamination is further addressed at **Section 5.2**.

## 2.4 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

### Application of Seniors Housing SEPP

Clause 4(1) of the Seniors Housing SEPP identifies land to which the SEPP applies, being land within NSW that is zoned primarily for urban purposes or land that adjoins land zoned primarily for urban purposes, but only if:

...  
(b) *the land is being used for the purposes of an existing registered club.*

The Site is being used for the purposes of a golf course which is an existing registered club in accordance with the definitions provided at Clause 3 of the Seniors Housing SEPP, as follows:

**existing registered club** means a registered club in existence on land immediately before the date on which State Environmental Planning Policy (Seniors Living) 2004 (Amendment No 2) commences.

**registered club** means a club in respect of which a certificate of registration under the Registered Clubs Act 1976 is in force.

Clause 4(5) of the Seniors Housing SEPP states that a consent authority must not treat land that is being used for the purposes of an *existing registered club* as being *land zoned primarily for urban purposes* unless it is satisfied that most of the land that it adjoins is land zoned for urban purposes.

To that end, the land surrounding that part of the site proposed to be developed for the purpose of seniors housing is described as follows:

- Land to the immediate west, is zoned R2 Low Density Residential which is land zoned primarily for urban purposes.
- Land to the immediate north and east will be the retained golf course, which is zoned RE2 Private Recreation. Having regard to the permitted uses, the RE2 Private Recreation zone is also land zoned primarily for urban purposes. More specifically, the permitted uses in the RE2 zone are:

*Aquaculture; **Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Educational establishments; Environmental facilities; Environmental protection works; Flood mitigation works; Function centres; Hotel or motel accommodation; Information and education facilities; Kiosks; Pubs; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Respite day care centres; Restaurants or cafes; Roads; Water reticulation systems** (emphasis added)*

The permissible uses in the RE2 zone clearly support urban usage and the Site is situated in an urban location (being those bolded in the above), close to public transport and services and is adjoined by dwellings which collectively constitute an urban setting. Importantly, the prohibition of residential buildings within the zone does not disqualify the land from being able to be categorised primarily for urban purposes as it is not a pre-requisite pursuant to Seniors Housing SEPP.

Furthermore, that part of the Site proposed to be developed is not identified as environmentally sensitive land, within the meaning of Schedule 1.

Having regard to the above analysis, the Seniors Housing SEPP applies. Should a view be formed that the surrounding land is not zoned primarily for urban purposes, it is noted that serviced self-care housing is proposed. With reference to Clause 13(2) of the Seniors Housing SEPP, this is a form of seniors housing that does not have to be on land zoned primarily for urban purposes, as distinct from “in-fill self-care housing”.

#### 2.4.1 Requirements for a Site Compatibility Certificate

Clause 24 of the Seniors Housing SEPP applies to a DA made for the purpose of seniors housing where there is an existing registered club. Clause 24(2) outlines that a consent authority must not consent to a DA to which Clause 24 applies unless it is satisfied that the relevant panel has certified in a current site compatibility certificate that, in the relevant panel's opinion:

- (a) the site of the proposed development is suitable for more intensive development, and*
- (b) development for the purposes of seniors housing of the kind proposed in the development application is compatible with the surrounding environment having regard to (at least) the criteria specified in clause 25 (5) (b).*

Accordingly, this SCC application has been prepared to demonstrate that the Site is suitable for more intensive development, and that the proposal is compatible with the surrounding land uses. The proposed concept, pending the issuing of an SCC, will form the basis of a future DA.

Clause 25(5)(a)-(b) of the Seniors Housing SEPP lists criteria for the consideration of the relevant panel prior to issuing an SCC. The criteria is addressed in **Section 6.1** and **6.2** of this report.

Clause 25 (6) also states that the relevant panel may refuse to issue a SCC if it considers that the development is likely to have an adverse effect on the environment. The proposed concept will not have an adverse effect on the environment, as outlined throughout this report, and addressed in **Section 5**.

#### 2.4.2 Consistency with Aims of the Seniors Housing SEPP

Clause 2(1) of the Seniors Housing SEPP identifies the following aims of the Policy. It states as follows:

*This Policy aims to encourage the provision of housing (including residential care facilities) that will:*

- (a) increase the supply and diversity of residences that meet the needs of seniors or people with a disability, and*
- (b) make efficient use of existing infrastructure and services, and*
- (c) be of good design.*

The Seniors Housing SEPP identifies a number of means to achieve these objectives, which are contained in the subsequent Clause 2(2). Specifically:

- (2) These aims will be achieved by:*

*(a) setting aside local planning controls that would prevent the development of housing for seniors or people with a disability that meets the development criteria and standards specified in this Policy, and*

*(b) setting out design principles that should be followed to achieve built form that responds to the characteristics of its site and form, and*

*(c) ensuring that applicants provide support services for seniors or people with a disability for developments on land adjoining land zoned primarily for urban purposes.*

The proposal is consistent with the aims of the Seniors Housing SEPP as it will:

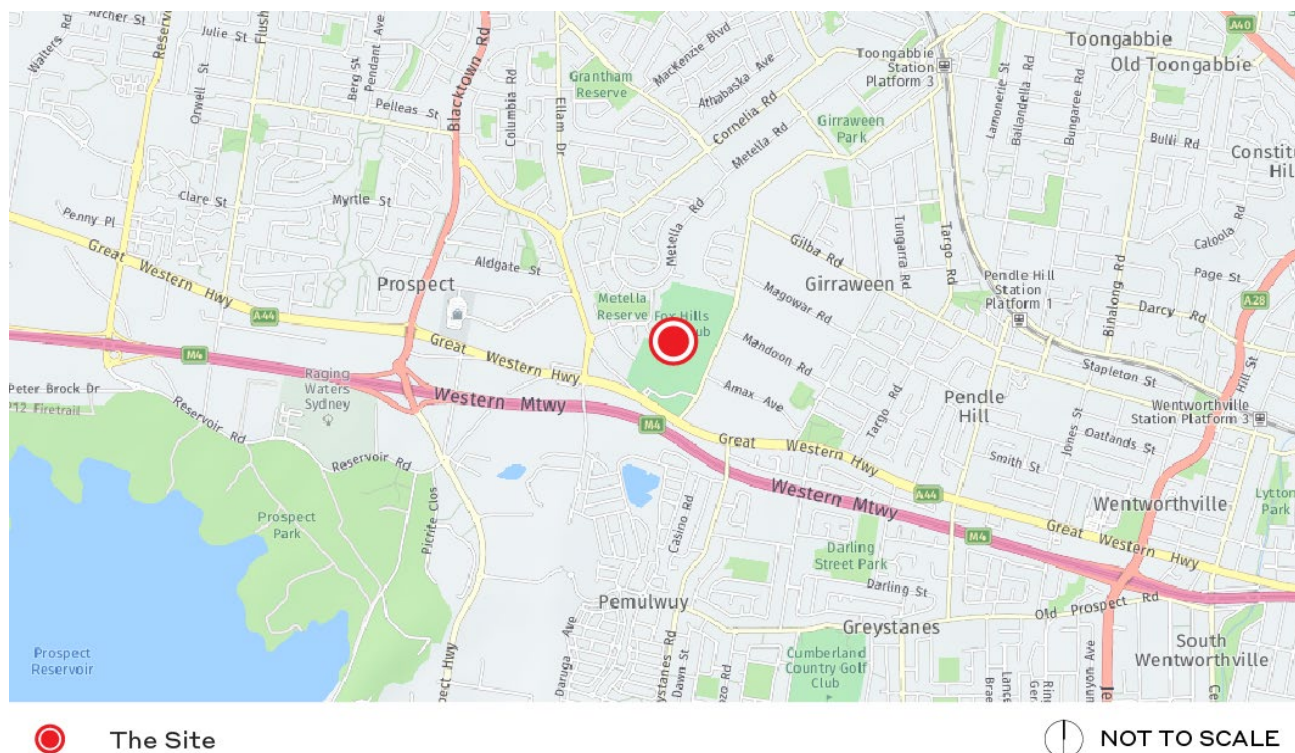
- Provide for 403 independent living units, increasing the supply and diversity of residences which meet the needs of seniors or people with a disability within the Blacktown LGA.
- The Site of the proposal enjoys good access to local services and therefore, the proposed seniors housing development is well located and will make efficient use of existing infrastructure and services.
- The proposed concept demonstrates high quality design, with living units designed to maximise the amenity of future residents with regards to solar access, permeability, cross ventilation and walkability to ancillary services.

### 3.0 Site Context

The Fox Hills Golf Course is located on Fox Hills Crescent, Prospect. It is legally known as Lot 100 DP 834672.

The Site is located in the Blacktown Local Government Area (LGA) except for a small portion along the eastern boundary which is located in the Cumberland LGA (former Holroyd LGA). No part of the scheme is within the Cumberland LGA.

The Fox Hills Golf Course is bound by Toongabbie Road to the east and the Great Western Highway to the south and it is surrounded by low density residential development to the west and north. The locational context of the Fox Hills Golf Course is shown at **Figure 2**.



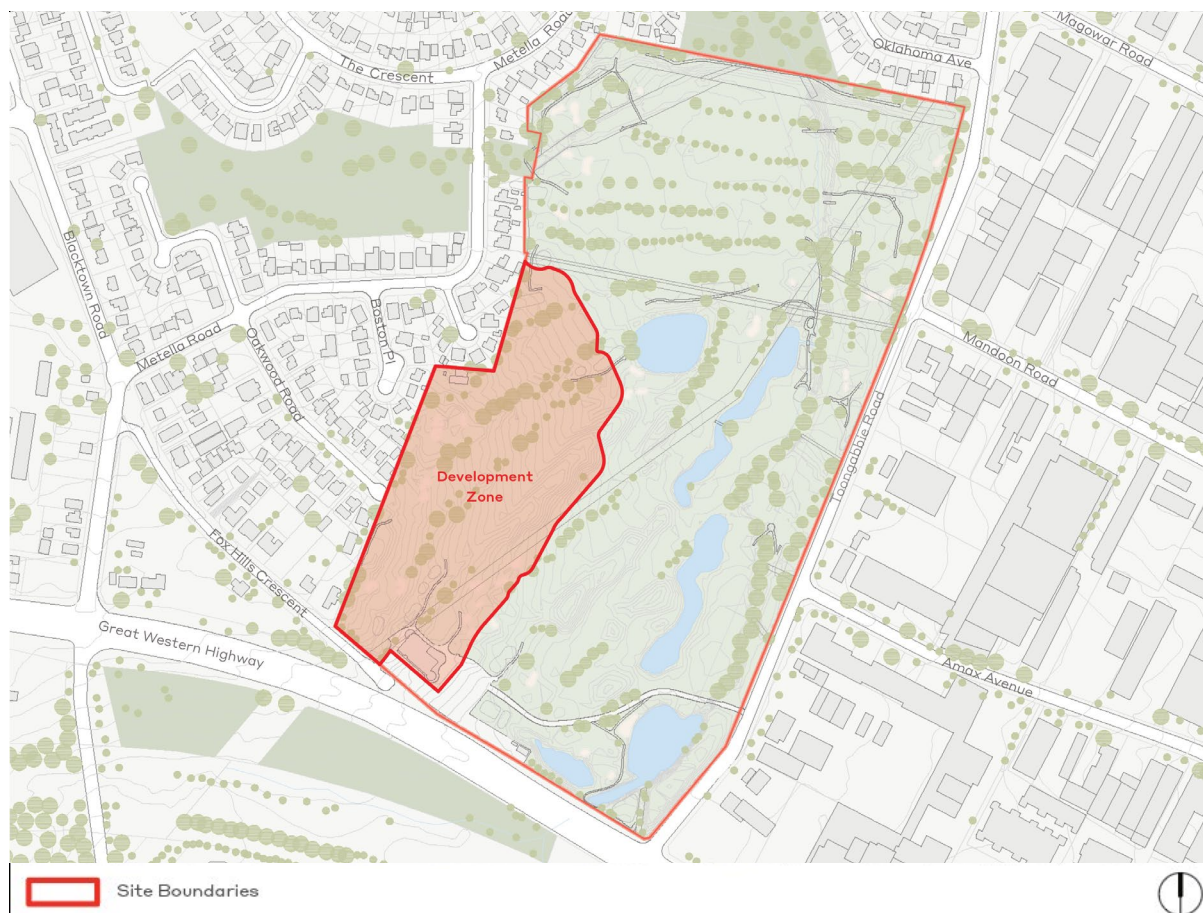
**Figure 2 Context Map**

Source: Nearmap and Ethos Urban



### 3.1 Site Description

The Site has a total area of 31.23 hectares. That part of the Site proposed to be developed for seniors housing is located in the south western and it has an area of 6.55 hectares, as shown at **Figure 3** below. A future DA will seek development consent for subdivision to create separate allotments for the golf course, as well as golf course works and the seniors housing development.



**Figure 3 Map Showing the Seniors Housing Development Site in relation to the broader Fox Hills Golf Course**  
Source: Ethos Urban

The proposal, including its siting and arrangement, has been informed by a detailed site analysis, with input from a range of consultants in fields of flooding, flora and fauna assessment, geotechnical, servicing and traffic. The constraints and opportunities identified are detailed in the Urban Design Report prepared by Ethos Urban at **Appendix C**.

The area designated for seniors housing development is designed to maximise spatial separation between residential properties and the golf course land, minimising the proposal's impact on the environment and ensuring that buildings are located outside golf course "hitting zones".

Along the southern boundary, the Site is developed with a hard stand car parking area which has access to Fox Hills Crescent, and the existing Fox Hills Golf Club which comprises a two-storey building. Beyond this is the Fox Hill Golf Course which consists of maintained grassed fairways and canopy trees that are both scattered and lining fairways. The Golf Course also includes small bodies of water.

### 3.2 Description of Surrounding Environment

The surrounding environment of the golf course is characterised by industrial and residential development and road infrastructure. More specifically, The Fox Hills Golf Course is bordered by Toongabbie Road to the east, and beyond this an industrial area developed with warehouses and workshops, as shown at Error! Reference source not found.. The Site is bordered by the Great Western Highway to the south, and an industrial warehouse and residential neighbourhood beyond. Development to the west and north comprises a low-density residential area, characterised by one and two storey dwelling houses, as shown in **Figure 5** below.



**Figure 4** Photographs of Various Industrial Buildings to the East of the Fox Hills Golf Course

Source: Ethos Urban





**Figure 5** Photographs of Various Dwelling to the West of the Site

Source: Ethos Urban

### 3.3 The Natural Environment

#### 3.3.1 Ecological Environmental

A Flora and Fauna Constraints Report prepared by Land Eco Consulting accompanies this application and is provided at **Appendix H**. Key findings of the report are as follows:

- Blacktown and South Creek soil landscapes underlie the Site, however much of the original soil surface has been altered to fabricate the golf course, with extensive areas of altered topography and imported infill.
- The Site is located in the Girraween Creek sub-catchment of the Parramatta River catchment. Several large, ponded waterbodies are also located within the Site.
- The Site consists of largely planted exotic and native species, with a small area considered as being comprised of remnant trees.
- Three vegetation community assemblages were identified within the study area including some that correspond to Plant Community Types.
- Approximately 0.23 hectares of vegetation in the study area corresponds to Cumberland Plain Woodland Critically Endangered Ecological Community (CEEC).
- One species of threatened fauna was observed in the study, this being the Little Lorikeet. There is potential for remnant native vegetation to provide habitat in the form of small hollows and represent a highly modified Endangered Ecological Community.
- The condition of native vegetation across the study area was poor and typical of a historically cleared, landscaped, and manicured golf course.
- The existing vegetation is likely to provide occasional foraging, shelter and potential breeding habitats for a variety of both common and threatened native fauna species.

The conclusions of the report are addressed at **Section 5.4**.

### 3.3.2 Flooding

A portion of the Fox Hills Golf Course has been identified as flood prone land. The golf course generally falls towards Girraween Creek which is subject to flooding that can affect the north eastern section of the broader site. This north eastern section contains high, medium and low risk flood precincts. 1% AEP flood level range between RL 38.69 and RL 44.39 and PMF level ranges between RL 39.60 and RL 45.55.

That part of the site proposed to be developed for seniors housing is not identified as flood prone land.

### 3.4 Location and Description of Available Services

The site is located approximately 4km from Blacktown Centre. Therefore, the site relies upon access to a public transport service to access the required range of shops and services. The site is within 400m of bus stops along Blacktown Road and Metella Road, which are serviced by routes that provide access to Blacktown, Seven Hills and Fairfield.

A private bus will also be provided by the Club, available to all residents.

Blacktown Centre provides access to all the required services under the Seniors Housing SEPP such as shops, bank service providers, retail and commercial services, community services and recreational facilities and general practitioners. A detailed breakdown of the available infrastructure is provided in **Section 5.8** of this report.



## 4.0 Proposal

### 4.1 Description of Proposal

The seniors housing development comprises serviced self-care housing that consists of self-contained dwellings where the following services are available on the site:

- Meals.
- Cleaning services.
- Personal care.
- Nursing care.

The proposal comprises 14 buildings which include the following:

- 403 independent living units including:
  - 90 x one-bedroom apartments.
  - 246 x two-bedroom apartments.
  - 67 x three-bedroom apartments.
- The provision of 475 car parking spaces within basement car parks throughout the Site, with 74 on-street car parks.
- Associated amenities, landscaping, and public domain works

An Architectural Concept Package including drawings illustrating the proposed development have been prepared by Altis Architecture and are provided at **Attachment A**. A photomontage of the proposal is also shown at **Figure 6**.



**Figure 6 Photomontage of Seniors Housing Concept**

Source: Altis Architecture

The SCC, if issued by the Department, will result in a DA being submitted to Blacktown Council for the detailed design of the seniors housing development, in accordance with the Plan provided in this application. A subsequent

development application will also be lodged for subdivision creating two separate lots for the golf course and the seniors housing development, and upgrade works to the Fox Hills Golf Course, which is discussed further in **Section 3.5** below.

The proposed concept has been informed and prepared having regard to the detailed opportunity and constraints analysis having been completed by the various design experts including flooding, ecology, planning, traffic, accessibility, servicing and geotechnical.

As a consequence of the site analysis, the proposed seniors housing development has been positioned to ensure the buildings elements are outside of flooding zones and the hitting zones associated with the golf course and are appropriate in terms of accessibility. The proposed building footprints ensure the retention of identified significant habitat and threatened species. These and other key assessment matters are further discussed at **Section 5** below.

Ensuring each unit achieves high levels of amenity has driven the design layout and the provision of facilities and landscaping. Internal pathways provide accessible pedestrian and cycling paths to travel between buildings and throughout the Site, with lift access provided from the basement car parking area to all residential levels of the development.

Ancillary facilities will be constructed over 3 levels and will be available for use by the residents and their guests. These include the following:

- Upgrades to the Fox Hills Clubhouse comprising:
  - Games room
  - Resident dining
  - Communal kitchen
  - Café
  - Lounge
  - Library/co-working space
  - Arts and crafts room
  - Cinema
  - Alfresco Terrace
- Pool and Fitness centre
- Community centre and kitchen
- Bowling green
- Various outdoor community areas with barbeque facilities.

## 4.2 Building Envelopes and Form

The proposed buildings envelopes for each of the 14 buildings have been designed to respond to the site's constraints and to deliver the best urban outcome for both future residents of the site and the surrounding properties. The proposal steps the height of the buildings from 3 storey adjacent to the existing R2 zoned residential neighbourhoods to a 4-storey height along the main access spine, stepping down in response to the sloping topography.

The buildings have been setback from the boundary by an average of 28m which exceeds the required 12m setback to provide generous separation between the proposed buildings and the existing residential area.

## 4.3 Landscaping

The development will be extensively landscaped to reflect the Fox Hills brand, with height proposed to ensure all building elements sit within a lightly landscaped setting that is compatible with the surrounding ecology and environment. Materials such as natural stone, timber features and recessed colour pallet are intended to design into the natural surroundings and context. A Landscape Masterplan prepared by Site Image Landscape Architects is provided at **Appendix D**, which details the landscape concept.



#### 4.4 Golf Course Upgrade

Upgrades to the Fox Hills golf course are also proposed, which will be subject to a subsequent development application separate to that for the detailed design of the seniors housing development. The upgrades include its reconfiguration into a 12 to 15 hole golf course, and general landscaping and associated works, shown at **Figure 7**.



**Figure 7** Proposed Golf Course Upgrade

Source: Altis Architecture

## 5.0 Strategic Justification

This section considers the issues relevant to the proposed development and provides an assessment of the relevant matters prescribed in section 4.15(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

### 5.1 Relationship with Regional and Local Strategies

#### 5.1.1 The Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan is a strategy for managing growth and change to guide integrated land use planning and infrastructure delivery for Greater Sydney to 2056. The Site is located within the Central River City and directly addresses the vision to invest in a wide variety of housing, infrastructure and services and improving amenity. The proposal for a seniors housing development will support the following objectives of the Greater Sydney Region Plan:

- Objective 10 – Greater Housing Supply: The proposal will provide 403 new units within the seniors housing development.
- Objective 11 – Housing is more diverse and affordable: The proposal will include a variety of housing types such as independent living units, accessible units, liveable housing to a silver level, and assisted living.
- Objective 12 – Create Places that bring people together: The proposal for a seniors housing development will include high quality apartments and a wide range of ancillary uses to create a new community with high amenity standards.

The Plan details principles for housing strategies, which includes the principle of diversity, which states as follows. Principles for Housing strategies

*Diversity: including a mix of dwelling types, a mix of sizes, universal design (refer to Objective 6), seniors and aged-care housing, student accommodation, group homes, and boarding houses.*

The proposal will directly address this principal through providing a new seniors housing development that includes a variety of housing types such as independent living units, accessible units, liveable housing to a silver level, and assisted living.

#### 5.1.2 Central Sydney District Plan

The Central Sydney District Plan is a guide for implementing the Greater Sydney Region Plan at a District level, structured around the strategies for infrastructure and collaboration, liveability, productivity, sustainability and implementation. The District Plan acknowledges the aging population and its implications on the changing needs of the Central River City, as it states as follows.

*A 183 per cent proportional increase in people aged 85 and over, and a 95 per cent increase in the 65–84 age group, is expected by 2036. This means 16 per cent of the District's population will be aged 65 or over in 2036, up from 11 per cent in 2016.*

*...More diverse housing types and medium density housing, as well as the design of walkable neighbourhoods, will create opportunities for older people to continue living in their community, where being close to family, friends and established health and support networks improves people's wellbeing.*

The proposal will provide a diversity of housing types within the seniors housing development. The development will include several ancillary uses and services catered to seniors living that support the health and well-being of the residents. The development has been designed to create a liveable and walkable community with a high level of amenity and design quality.

The proposal will support the following objectives of the Central Sydney District Plan:

- Planning Priority C3 – Providing services and social infrastructure to meet people's changing needs.
- Planning Priority C5 – providing housing supply, choice and affordability with access to jobs, services and public transport: The proposal will provide 403 new units, increasing housing supply in a location that is easily accessible by public transport and services.



The Plan details principles for housing strategies, which includes the principle of diversity, which states as follows. Principles for Housing strategies

*Diversity: including a mix of dwelling types, a mix of sizes, universal design (refer to Objective 6), seniors and aged-care housing, student accommodation, group homes, and boarding houses.*

The proposal will directly address this principal through providing a new seniors housing development that includes a variety of housing types such as independent living units, accessible units, liveable housing to a silver level, and assisted living.

### 5.1.3 Blacktown Local Strategic Planning Statement 2020

The Blacktown Local Strategic Planning Statement (Blacktown LSPS) provides a 20-year land use vision for Blacktown City and outlines how growth will be managed sustainably through infrastructure and collaboration, liveability and productivity. The Site is located in the Blacktown Precinct. The Plan describes targeted improvement to the liveability of the Blacktown Precinct, as follows:

*Place-based planning in Blacktown Strategic Centre, Seven Hills, Doonside and Toongabbie, with more density and diversity in housing types including aged and retirement living.*

The proposal will provide a medium density seniors housing development in the Toongabbie area to increase both density and diversity of housing types in the Blacktown Precinct. The proposal supports the following targets of the Blacktown LSPS:

- Promoting high quality design outcomes: The proposed seniors housing development has been designed to exhibit high quality urban design, with apartments and associated amenities providing high quality amenity.
- Promoting diverse and affordable housing: The new seniors housing development includes a variety of housing types such as independent living units, accessible units, liveable housing to a silver level, and assisted living to provide diversity of housing.

### 5.1.4 Blacktown Housing Strategy 2020

The Blacktown Housing Strategy 2020 outlines how continued growth in the population and housing market will be managed. The Strategy describes the need for increased seniors housing, as follows:

*An estimated 34,769 people who are 65 years and over reside in our city. The majority of our older residents are long term residents...*

*The residential aged care room capacity in our City is 1,762. The growth of over 80-year-olds will be substantial by 2041 (373% growth in people over 85+ years and 263% growth in people 80–84 years). While the life expectancy and independence of older people in Australia is improving generally, people over 80 years of age are considered in the frail aged category and often require care at some stage. Based on projected growth, frail persons and the number of places currently available, there could be a deficit of approximately 3,500 aged care places by 2041.*

*We are committed to working with all levels of government and government agencies, social and community organisations and the private sector on a range of mechanisms to ensure there are sufficient dwelling options available to meet the needs of our residents. These will include affordable rental housing, boarding houses, student accommodation, social housing, rent-to-buy and seniors housing.*

The proposal will deliver 403 seniors housing units at an appropriate location, thereby reducing the shortage of aged care places forecast by the Housing Strategy.

## 6.0 Key Assessment Matters

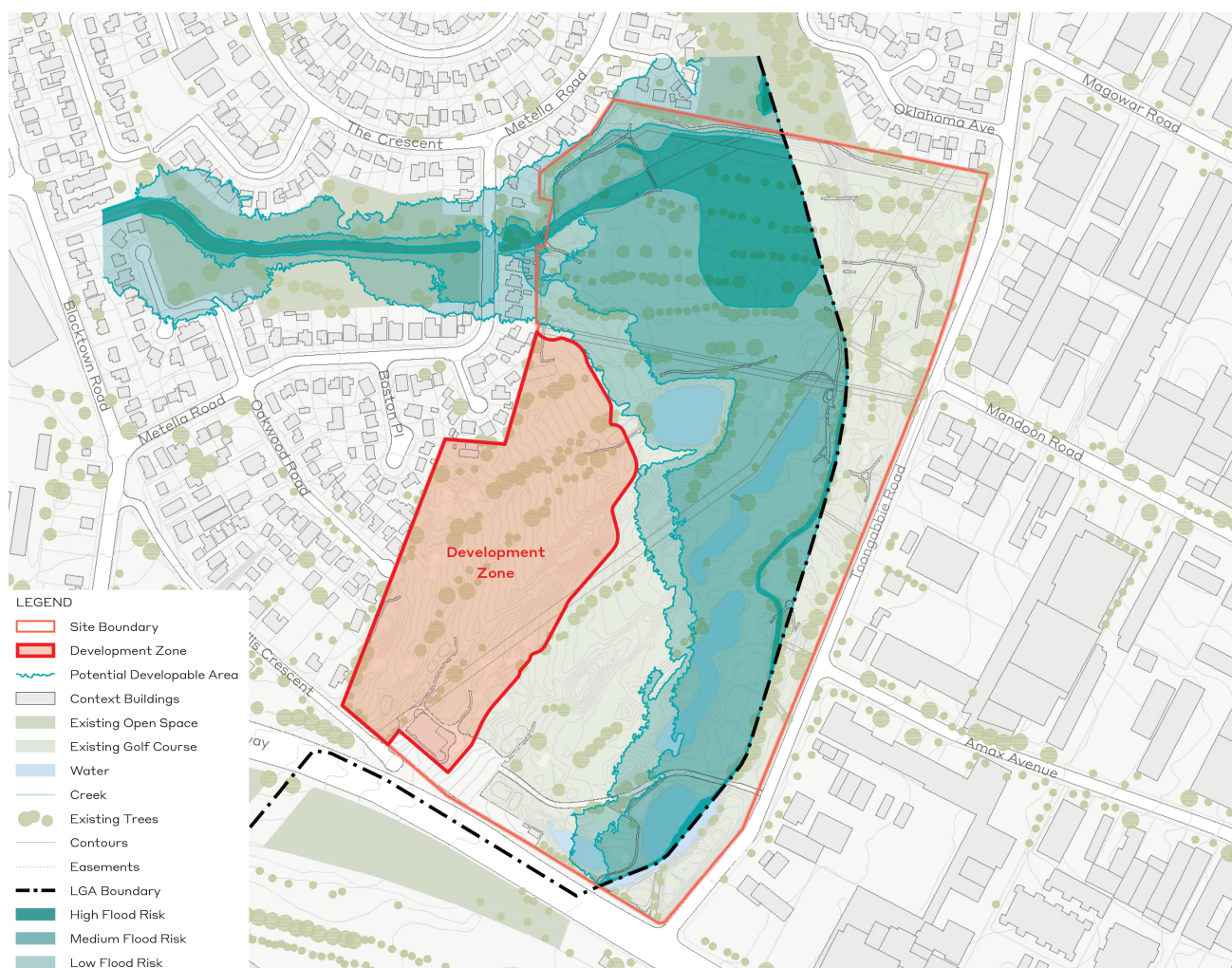
### 6.1 Compatibility, Flooding and Ecology

A portion of the Fox Hills Golf Course has been identified as flood prone land. The Site generally falls towards Girraween Creek which is subject to flooding that can affect the golf course. Accordingly, the Golf Course as a whole site contains high, medium and low risk flood precincts, as shown at **Figure 8**. 1% AEP flood level range between RL 38.69 and RL 44.39 and PMF level ranges between RL 39.60 and RL 45.55.

An integrated Water Cycle Management and Flood Report has been prepared by Sparks + Partners Consulting Engineers and is provided at **Appendix E**. The report confirms that:

*The proposed Seniors Living development is located outside of the flood zones. Freeboard will be provided to the ground floor habitable levels to the local flood levels within the site. Similarly, basement carparking will be flood protected to Council policy requirements. Pedestrian and vehicular access to the Seniors Living development is available during the 1% AEP flood via Fox Hills Crescent and Oakwood Road.*

*During detailed design development it will be demonstrated that all Council flooding policy requirements for flood safety and evacuation will be satisfied.*



**Figure 8 Map Showing Flood Prone Land in Relation to the Proposed Developable Area**

Source: Ethos Urban

The Integrated Water Cycle Management and Flood Report also outlines a general integrated water management strategy that includes rainwater reuse, and stormwater quality and quantity.

## 6.2 Contamination and Remediation

Clause 7 of the *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55) requires that consideration be given to whether the site on which development is proposed is contaminated, and if so, whether remediation is required to accommodate the proposed use. The accompanying PSI, which is provided at **Appendix G**, T concludes as follows.

*The PSI did not identify any soil or groundwater contamination that was assessed to pose a risk to on-site receptors and/or in relation to the proposed development and anticipated land use. However, the intrusive investigation component of the PSI was limited and a Detailed (Stage 2) Investigation (DSI) is required to further characterise the site conditions.*

*The PSI has not identified any triggers for remediation. A DSI is required to confirm site suitability or establish whether remediation is necessary to make the site suitable for the proposed development. Nevertheless, JKE is of the opinion that the site is compatible for the proposed development within a residential-type land use setting. JKE have not identified contamination that would preclude the use of the site for such purpose.*

Accordingly, with the implementation of the recommendations provided in the PSI, it is expected the Site is suitable for seniors housing.

## 6.3 Geotechnical Investigation

A Geotechnical Report has been prepared by JK Geotechnics and is provided **Appendix H**. A primary investigation was undertaken to determine the geotechnical and hydrogeological conditions. The report outlines that the subsurface conditions are considered 'typical' for the region, and no particular issues of geotechnical concern are identified. Subject to recommendations relating to site preparation and earthworks, the report concludes that the site is geotechnically suitable for the proposed development.

## 6.4 Ecology, Flora and Fauna

The accompanying Flora and Fauna Constraints Report by Land and Eco Consulting (refer **Attachment H**) confirms that a seniors housing development would be a suitable and compatible land use for this site because the biodiversity values of the study area are of low condition and /or overall significance. Any requirement for the preparation of a Biodiversity Development Assessment Report would be determined as part of a future DA.

## 6.5 Visual Impact

The urban design principals that form the foundation of the built form has been provided in the Urban Design Report prepared by Ethos Urban (**Attachment C**). The indicative built form of the proposal is shown and described in the Concept Drawings provided at **Appendix A**. The significant size of the site offers flexibility in spatial master planning and built form design that has allowed the development of the proposed concept plan for the site that responds to the site's interfaces with adjoining residential areas by pushing back the massing from the sensitive edges.

The built form responds to the opportunities and constraints of the site and immediate area, which demonstrates its compatibility with the existing uses of the area.

The proposal presents 14 separate buildings located off a central access spine, distributed to create a medium density environment which maintains a generous distance from the residential area to the west, with a setback more than double the compliant width of the Blacktown DCP. Within this significant setback, deep soil zones will be provided, enabling the setback to contain large trees and vegetation. This ensures there is a landscaped buffer between the residential neighbourhood and the seniors housing development.

The proposal presents steps in the building form to respond to the surrounding context and sloping site topography. The proposal utilises the sloping topography to provide even heights of buildings which creates even built form across the development. Buildings above three storeys present a recessed upper level to minimise bulk and scale of the buildings when viewed from the ground plane.

The buildings adjacent to the residential area that face onto and enjoy views over the golf course have been responded to in the site planning through the provisions of greater setbacks, vegetated landscaping and reallocated built form. More than 51% of the site cover dedicated to landscaping and open space. The provision of the central spine running the length of the development, and the various pathways between the buildings create view corridors to break up the mass of the collection of buildings.

Accordingly, the proposal will present a development that is sympathetic with its surroundings and will provide a high-quality environment compatible with its setting on an existing golf course that will not result in undue visual impact.

## 6.6 Traffic

An assessment of the potential traffic impacts on the proposal has been prepared by Traffix and is provided at **Attachment I**. The report considers the existing traffic and road conditions, proposed parking rates, development trip generation, traffic distribution, site vehicular access and internal design. The conclusions of the report are summarised as follows:

- *The subject site is well connected to the public transport network with reliable access to regular bus services. These ensure the site is ideally situated for a seniors living development as it provides a good opportunity to encourage future tenants / visitors to use sustainable transport modes.*
- *The proposed development requires a minimum of 392 parking spaces in accordance with the SEPP (Housing for Seniors or People with a Disability 2004). In response, the development proposes a total of 549 parking spaces, of which 475 spaces are provided within basements and 74 spaces are provided on-street. As such, all normal parking demands are expected to be readily accommodated on-site. The 'additional' parking spaces are justified for the reasons discussed, including the public transport not being appropriate in all circumstances and its distance may discourage some residents, and the DCP generally encouraging higher parking rates for residential development than the SEPP requirements. Furthermore, the SEPP rates does not include parking demands for staff or visitors and as such additional parking is considered necessary to accommodate these demands.*
- *The traffic generation arising from the development has been assessed as a net change over existing conditions. SIDRA modelling shows no change in LoS and only minor increases in average delay for all four (4) intersections during the critical evening peak. As such, the traffic impacts of the proposal are considered acceptable and supportable.*
- *Access for the development is proposed via a new road with intersections at Fox Hills Crescent and Oakwood Road. A detailed design of the internal road network, access arrangements and basement car parks will be conducted at DA stage.*

This traffic impact assessment therefore demonstrates that the subject application is supportable on traffic planning grounds. Traffix anticipates an ongoing involvement during the development approval process. It is further noted that a detailed assessment will occur at development application stage, based on final development yields and associated plans.

Accordingly, it is considered that potential traffic implications of the proposal can be adequately managed.

## 6.7 Access

### 6.7.1 Public Transport

The Site is located within 400m of a bus stop on Blacktown Road which provides access to the 700 and 800 bus routes, as shown at **Figure 9**. The 700 bus route connects Blacktown and Parramatta, as shown at **Figure 10**. The 800 bus route connects Blacktown to Fairfield via Wetherill Park, as shown at **Figure 10**. The site also has access to Bus Stop Route 702 to the north of the site.

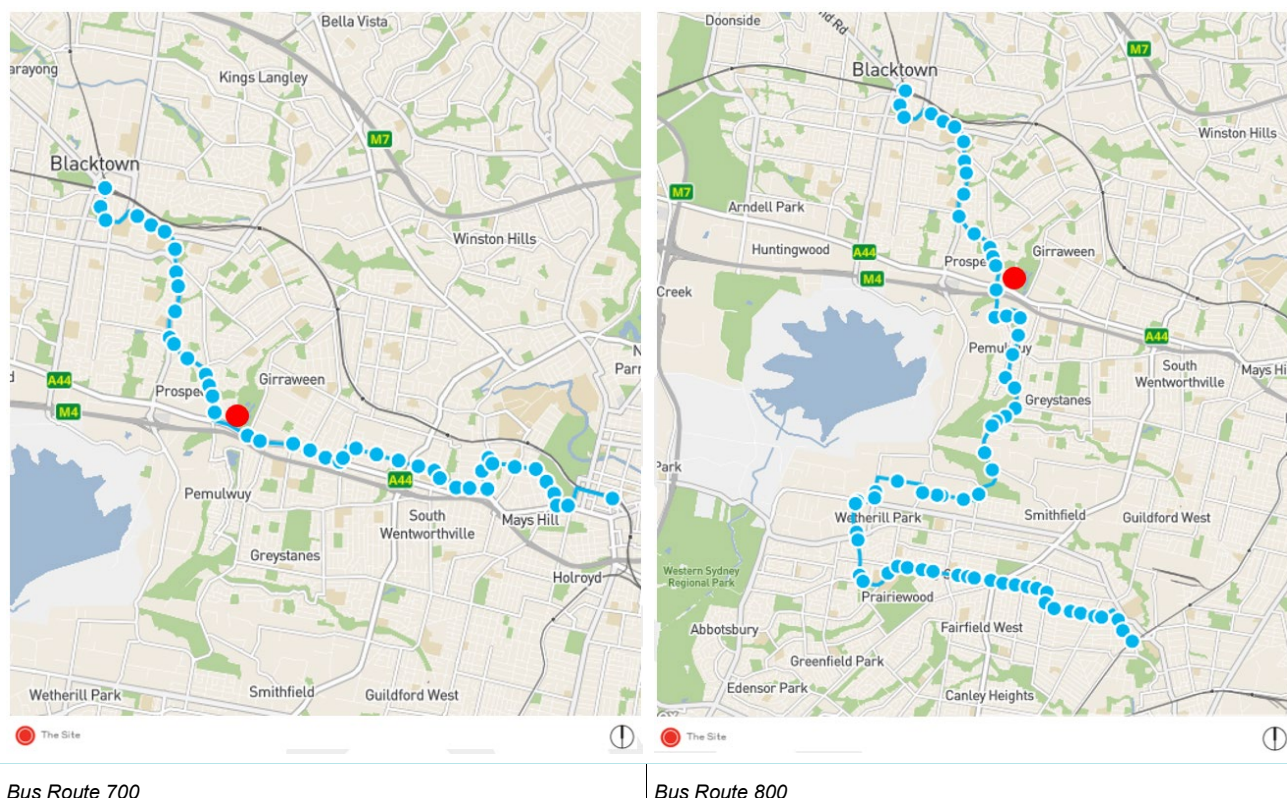




**Figure 9** Bus Stop in Relation to Site

Source: Altis Architecture





**Figure 10 Bus Routes from Nearby Bus Stop**

Source: Transport for NSW

**Table 4** below provides the bus schedule for routes 700 and 800.

**Table 2 Bus Schedules**

Bus Route	Schedule (Mon-Fri)	Timing
700 Parramatta to Blacktown	<p>AM: 5:23, 5:53, 6:08, 6:25, 6:40, 6:55, 7:10, 7:27, 7:44, 8:00, 8:15, 8:32, 8:47, 8:57, 9:03, 9:16, 9:28, 9:43, 9:28, 10:13, 10:28, 10:43, 10:58, 11:13, 11:28, 11:58</p> <p>PM: 12:28, 12:58, 1:31, 2:01, 2:31, 2:46, 3:01, 3:20, 3:36, 3:51, 4:06, 4:21, 4:36, 4:50, 5:05, 5:20, 5:35, 5:50, 6:06, 6:18, 6:31, 6:46, 7:00, 7:12, 7:27, 7:57, 8:26, 8:54, 9:23, 9:53, 10:23, 10:53, 11:23, 11:53</p>	Arriving at Blacktown Interchange – Stand D approximately 25-30 minutes
700 Blacktown to Parramatta	<p>AM: 5:01, 5:31, 5:46, 6:01, 6:17, 6:32, 6:47, 7:03, 7:19, 7:34, 7:50, 8:07, 8:22, 8:37, 8:52, 9:07, 9:22, 9:32, 9:37, 9:52, 9:59, 10:12, 10:27, 10:42, 10:57, 11:12, 11:42</p> <p>PM: 12:12, 12:42, 1:12, 1:42, 2:12, 2:27, 2:42, 2:57, 3:18, 3:38, 3:55, 4:14, 4:29, 4:44, 4:59, 5:14, 5:29, 5:44, 5:59, 6:14, 6:37, 6:52, 7:06, 7:21, 7:36, 8:03, 8:31, 9:01, 9:31, 10:01, 10:31, 11:01, 11:31</p>	Arriving at Blacktown Interchange – Stand D approximately 20-25 minutes
800 Fairfield to Blacktown via Wetherill Park	<p>AM: 5:44, 6:14, 6:23, 6:36, 6:47, 7:03, 7:18, 7:33, 7:47, 8:06, 8:21, 8:36, 8:54, 9:16, 9:45, 10:15, 10:45, 11:15, 11:45</p> <p>PM: 12:15, 12:45, 1:15, 1:45, 2:15, 2:50, 3:20, 3:50, 4:10, 4:21, 4:36, 4:51, 5:06, 5:21, 5:36, 5:51, 6:06, 6:16, 6:46, 7:14, 7:44</p>	Arriving at Blacktown Interchange – Stand D approximately 18-25 minutes

### **6.7.2 Access to Services**

The 700 and 800 bus routes provide access to Blacktown Centre which is both a strategic centre and health and education precinct under the Central District Plan. Services within proximity of the site and within Blacktown Centre are described below.

#### **Medical Facilities**

Medical facilities at Blacktown Centre include the following:

- Blacktown Hospital.
- Blacktown Family Medical Centre (general practitioner).
- Eastbrooke Medical Centre (general practitioner).
- Blacktown Medical Imaging.
- Westpoint Shopping Centre which includes.
  - Dental
  - Optometry
  - Physio
  - Hearing

#### **Shopping Centres and Supermarkets**

Westpoint Shopping Centre within the Blacktown Centre includes a range of supermarkets and retail including Woolworths, Coles, Myer, and Target. The site is wheelchair accessible and provides disable parking.

#### **Community Centres and Senior Citizen Club**

Blacktown Centre provides a range of community facilities including the Blacktown Seniors Citizen Centre, Max Webber Library, and various places of public worship. The proposal will also comprise several community facilities within the Fox Hills Seniors Housing development.

#### **Parks and Recreational Facilities**

The proposal will maintain the adjoining Fox Hills Golf Course which will provide generous open space. The proposal will also provide various facilities to meet the need of the residents including a swimming pool, bowling green, fitness centre and various landscaped communal spaces, gardens, walking and cycling path.

#### **Banks and Post Offices**

Westpoint Shopping Centre in Blacktown Centre includes multiple banking services including ANZ, Bank of Queensland, Bankwest, Commonwealth Bank, Credit Union Australia, Lotus Foreign Exchange, NAB, St George Bank, Suncorp, Travelex and Westpac. Blacktown Post Office is also located within Blacktown Centre, opposite Blacktown Train Station.

A private bus will also be provided by the Club, available to all residents.

## **6.8 Servicing**

As has been noted, the application is accompanied by a Technical Review Statement prepared by Endeavour Energy (refer **Appendix K**). The statement undertakes an assessment of the existing and required services infrastructure which is available to accommodate the proposed development. The statement concludes that the existing network would have available capacity to cater to the required load demand.

A servicing strategy which details the servicing of water, sewer and power available to the site will be undertaken and submitted with the detailed design for the proposed seniors housing.

## 6.9 Potential Land Use Conflicts

The proposal has been sited and designed to mitigate the risks of golf balls entering the seniors housing development through generous building setbacks. At the detailed DA stage, this will be further investigated and the installation of screens, netting and fencing on the golf course interface will all be considered. On the golf course itself, planting of appropriate trees will assist in physical screening.

In addition, the requirements of Clause 23 of the Seniors Housing SEPP ensure appropriate measures are put in place to separate the club from the residential areas of the proposed development to avoid land use conflicts. To assist in ensuring the financial viability of the club, the proposal includes shared ancillary facilities including function rooms, meeting areas, recreational facilities, swimming pool, gym and a communal kitchen. There will be separate entrances for the club and the seniors housing development, and some facilities will be used exclusively by the residents of the seniors housing development.

In this regard, an appropriate protocol document will be prepared as a component of a future DA for the proposal. This protocol document will ensure that there will be no direct or unmanageable social or residential amenity land use conflicts arising because of the proposed development.

## 6.10 Public Interest and Reasons for Applying for Seniors Housing in this Locality

The proposal will deliver residential floor area on a site which is compatible with the surrounding infrastructure and development. As supported by the consultant reports appended to this application, the proposal will result in the following community benefits to both future intended occupants as well surrounding residents:

- Provision of an increased supply and diversity of accommodation that meets the needs of seniors and/or people with a disability on land which is being used for the purposes of an existing registered club;
- Contribution to the ongoing viability of a publicly accessed recreation facility, being the Fox Hills Golf Club;
- Improved environmental outcomes for the site and surrounds, through the provision of generous landscaping within the senior's development and amendments to the eastern portion of the golf course, in accordance with the recommendations from the biodiversity consultants;
- The site is capable of accommodating seniors housing in an appropriate location without causing risk to human life because of flooding or bushfire.

## 7.0 Statement of Compatibility

This section of the report provides a Statement of Compatibility demonstrating the Site's suitability and compatibility for the intended use, having regard to the matters for consideration in Clause 25 and 26 of the Seniors Housing SEPP.

### 7.1 Clause 25 Criteria (Seniors Housing SEPP)

Clause 25(5)(b) of the Seniors Housing SEPP requires that the Director-General must not issue a Site Compatibility Certificate unless he or she is of the opinion that the proposed development is compatible with the surrounding land uses having regard to (at least) the criteria outlined in **Table 3** below. The table provides a response to each criterion in Clause 25(5)(b), demonstrating the proposal's consistency with this Clause of the SEPP.

**Table 3 Assessment of the proposal against Seniors Housing SEPP Clause 25(5)(b)**

Clause 25(5)(b) criteria	Assessment of the Proposed Concept
<i>(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</i>	<p>The proposal has been designed to ensure it is compatible with the natural environment, including applicable hazards such as flooding and bushfire, and surrounding land uses in the vicinity of the site.</p> <p>The impact of potential flooding on the proposal, as well as the proposal's impact on local flooding has been assessed in <b>Section 5.1</b> and in the Integrated Water Cycle Management and Flood Report provided at <b>Attachment E</b>. The assessment concludes that the proposal's footprint is not flood affected in any event up to and including the Probable Maximum Flood event.</p> <p>Potential contamination and remediation are considered in <b>Section 5.6</b> and in the PSI provided at <b>Appendix G</b>. The assessment concludes that there is no evidence of soil or groundwater contamination that was assessed to pose a risk to on-site receptors and/or in relation to the proposed development and anticipated land use. The assessment also did not identify any triggers for remediation. Accordingly, the Site can be made suitable for the proposed development subject to recommendations contained in the PSI.</p> <p>A Geotechnical Report has been prepared and included in <b>Section 5.7</b> and <b>Appendix G</b>. From the Geotechnical Report, it is considered that the Site can be made suitable for the proposed form of development subject to the implementation of recommendations.</p> <p>A Flora and Fauna Constraints Report has been prepared, and the findings of which are included in <b>Section 5.8</b> and in <b>Appendix H</b>. The assessment states that the natural environment and biodiversity values of the study area are of low condition and/or overall significance. The report considers that Seniors Housing development would be a suitable and compatible land use for this site.</p>
<i>(ii) the impact that the proposed development is likely to have on the uses that, in the opinion of the relevant panel, are likely to be the future uses of that land,</i>	<p>The site is zoned RE2 Private Recreation under the Blacktown LEP 2015.</p> <p>The proposed seniors housing concept and development will not impact on the future use of immediately surrounding land as a golf course and golf club (recreation facility and registered club), in fact, the proposed development will enable the course's reconfiguration and continuance as a viable golfing offer.</p> <p>The proposed concept is compatible with the future use of neighbouring land as a golf course and club, is not anticipated to impact on the ability to use surrounding RE2 Private Recreation zoned land for the range of permissible uses listed in the LEP.</p>
<i>(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</i>	<p><b>Section 5.8</b> and the Urban Design Report at <b>Appendix</b> assess the proposed concept for its accessibility to services and facilities identified in Clause 26 of the Seniors Housing SEPP. This is also considered in more detail in <b>Section 6.2</b> below.</p> <p>It is identified that the proposal complies with the accessibility requirements of Clauses 26 and 38 as detailed on Page 23 of the Urban Design Report</p>

Clause 25(5)(b) criteria	Assessment of the Proposed Concept
<i>any proposed financial arrangements for infrastructure provision</i>	<p>prepared by Ethos Urban. The Urban Design Report concludes that the Site has adequate access to various town centres which contain services that will be available to meet the demands arising from the proposed development.</p> <p>Furthermore, an assessment of the site's access to infrastructure is included in <b>Section 5.4</b> and <b>Appendix K</b>. The statement concludes that the existing network would have available capacity to cater to the required load demand.</p> <p>A detailed access report will be provided as part of the DA.</p>
<i>(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</i>	<p>The site is zoned RE2 Private Recreation and currently forms part of Fox Hills Golf Course. The overall golf course master plan demonstrates that there is sufficient residual land to accommodate a 12-hole golf course and accordingly the land the subject of this application is surplus to the needs of Fox Hills Golf Club.</p> <p>A statement prepared by Fox Hills Golf Club is included in <b>Section 2.3</b> and the Altis Architectural Package at <b>Appendix A</b>. This statement makes comment to the current issues relating to 18 hole golf courses and the benefits of a more consolidated course. The proposal will allow Fox Hills the opportunity to invest resources into improving the quality of the golf course, thereby ensuring its attractiveness and viability into the future.</p> <p>Accordingly, the proposed development will not impact on the provision of land for open space and special uses in the vicinity of the development and will improve the quality and amenity of the existing open space on the Site.</p>
<i>(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,</i>	<p>The proposal has been designed with consideration to surrounding uses.</p> <p>The Urban Design Report prepared by Ethos Urban (<b>Attachment A</b>) and the Architectural Concept Package prepared by Altis Architecture (<b>Attachment C</b>) describe the urban design principles and design statement behind the proposed concept. The bulk, scale and built form has been designed to minimise the development's impact of existing uses and land within the vicinity of the development. The proposed built form provides a sympathetic and compatible response to the surrounding area, maintaining residential amenity of nearby residential development. This has been further discussed in <b>Section 5.5</b> above.</p> <p>Given the separation distance of the Site from neighbouring dwellings, the proposed height and scale of the proposed seniors housing development limits impacts upon the amenity of existing uses.</p>
<i>(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,</i>	<p>The Blacktown Local Environmental Area is exempt from the provisions of the Native Vegetation Act 2003, in accordance with Part 3 Schedule 1.</p>



## 7.2 Clause 26 Criteria (Seniors Housing SEPP)

Clause 26 of the Seniors Housing SEPP requires that a consent authority not consent to a DA for seniors housing unless it is satisfied that residents of the proposed development will have access that complies with a number of requirements in subclause (2). An assessment of the proposed concept's compliance with the requirements of Clause 26(2) is provided in **Table 4** below with reference to the Urban Design Report included in **Appendix C**.

**Table 4 Assessment of Proposal against Seniors Housing SEPP Clause 26(2)**

Clause 26(2) criteria	Assessment of the Proposed Concept
<p>(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to—</p> <p>(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and</p> <p>(b) community services and recreation facilities, and</p> <p>(c) the practice of a general medical practitioner.</p>	<p>The proposed development site has access to shops, bank service providers and other retail and commercial services that residents may reasonably require, as well as community services and recreation facilities, and the practice of a general medical practitioner.</p> <p>A high level of services will be provided on the site in addition to those available via both public and private transport options.</p> <p>This is further discussed in <b>Section 5.7.1</b></p>
<p>(2)(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable—</p> <p>(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,</p> <p>(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,</p> <p>(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time,</p>	<p>The facilities referred to in Subclause (1) are not within 400 metres of the site, compliance with access is provided in Subclause (2)(b) below.</p>
<p>(b) in the case of a proposed development on land in a local government area within the Greater Sydney (Greater Capital City Statistical Area)—there is a public transport service available to the residents who will occupy the proposed development—</p> <p>(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and</p> <p>(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and</p> <p>(iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive), and the gradient along the pathway from the site to the public transport services (and from the public transport services to the facilities and services referred to in subclause (1)) complies with subclause (3),</p>	<p>The Urban Design Report prepared by Ethos Urban (<b>Attachment C</b>) demonstrates that the site is acceptable in terms of accessibility. In particular, the site is located 390m from the bus stop on Blacktown Road which is serviced by the 700 and 800 bus routes. As outlined on Page 23 of the Urban Design Report the gradients along the pathways from the site to the bus stop comply with the controls listed in Subclause (3). Any necessary pathway and crossing improvements, if required, can be delivered as part of the future DA.</p> <p>The bus routes provide access to Blacktown Centre and Fairfield Town Centre which where the requisite services are available, as outlined at <b>Section 5.7.1</b>.</p> <p>The 700 and 800 bus services will take residents to a bus stop at the Blacktown Bus Interchange that is located less than 400m from the town centre facilities. The Blacktown Centre provides a comprehensive network of footpaths and pedestrian crossings that facilitate appropriate access to shops and services.</p> <p>The 700 and 800 bus routes provide adequate services to satisfy Subclause (1)(b)(iii) as outlined in <b>Section 5.7.1</b> above.</p> <p>A private bus will also be owned and operated by the Club, and available to all residents.</p>
<p>(3) For the purposes of subclause (2) (b) and (c), the overall average gradient along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and</p>	<p>The topography of the pathway from the Site to the bus stop has been demonstrated in the Urban Design Report prepared by Ethos Urban which is provided at <b>Attachment C</b>. The Urban Design Report demonstrates that the gradients of the pathway, which is</p>

Clause 26(2) criteria	Assessment of the Proposed Concept
<p><i>services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable—</i></p> <p><i>(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,</i></p> <p><i>(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,</i></p> <p><i>(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time.</i></p>	<p>based on survey information, comply with the controls outlines in Subclause (3).</p>

In summary, it is evident that:

- The development will provide appropriate pedestrian access to public transport in accordance with Clause 26(2)(3)(4) of the Seniors Housing SEPP.
- The available bus services provided by routes 700 and 800, in conjunction with the abovementioned pedestrian infrastructure, will provide appropriate access to services in a manner consistent with Clause 26(2)(b) of the Seniors Housing SEPP. A private bus will also be provided to all residents.
- The destination shopping centre at Blacktown Centre provides the necessary services to satisfy Clause 26(1) and 26(5) of the Seniors Housing SEPP.



## 8.0 Conclusion

This SCC application is submitted to the Department of Planning Infrastructure and Environment in accordance with the provisions of Clause 25 of the Seniors Housing SEPP. The purpose of the SCC application is to facilitate the preparation of a Development Application for the construction and occupation a seniors housing development comprising 14 buildings which include 403 independent living units; the provision of 515 car parking spaces within basement car parks throughout the site; and ancillary amenities and services, landscaping, and public domain works.

Clause 24(2) of the Seniors Housing SEPP requires that a consent authority must not consent to a development application unless the consent authority is satisfied that the relevant panel has certified in a current site compatibility certificate that, in the relevant panel's opinion:

- the site of the proposed development is suitable for more intensive development, and
- development for the purposes of seniors housing of the kind proposed in the development application is compatible with the surrounding environment having regard to (at least) the criteria specified in Clause 25(5)(b).

Having had regard to the environmental constraints and the environmental assessment contained in this report, it is considered that the site is suitable for more intense development, with the proposed development providing for a contextually appropriate building form and land use for the Site.

It is considered that the proposed concept is compatible with the surrounding environment having regard to not only the criteria specified in Clause 25(5)(b), but having regard to the existing streetscape, environment and surrounding land uses.

The proposed development is consistent with the aims of the Seniors Housing SEPP and meets the requirements of Clause 25 of the Seniors Housing SEPP. Accordingly, a Site Compatibility Certificate can be issued for the proposal.