

THE HILLS SHIRE COUNCIL

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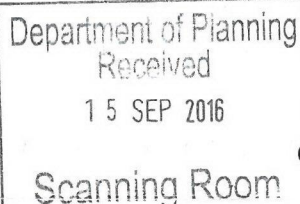
ABN No. 25 034 494 656

12 September 2016



PCU067037

Mr Terry Doran
Team Leader, Sydney Region West
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001



Our Ref: 161022868 / FP85

Dear Mr Doran

Application for Site Compatibility Certificate – SEPP (Housing for Seniors or People with a Disability) 2004, 589-593 Old Northern Road, Glenhaven (Lots 2 and 3 DP 225754 and Lot 1 DP 13598)

I refer to your letter dated 24 August 2016 seeking comments with respect to an application for a Site Compatibility Certificate for seniors housing at 589 – 593 Old Northern Road, Glenhaven which is located within the Hornsby Shire LGA. It is understood that the subject proposal will facilitate the extension of the existing aged care facility known as 'Glenhaven Green Retirement Village' at 599 – 607 Old Northern Road, Glenhaven.

The proposal involves the construction of a 120 bed residential care facility and 114 serviced self-care dwellings. This will comprise of seventy (70) x two and three bedroom dwellings, plus forty-four (44) x two bedroom dwellings in several 2 and 3 storey apartment buildings. The residential care facility will be located in the vicinity of Old Northern Road and be part two / part three storeys in design.

The subject site is zoned RU2 Rural Landscape under the Hornsby Local Environmental Plan 2013. The property is located opposite land zoned E4 Environmental Living under The Hills Local Environmental Plan 2012. SEPP (Housing for Seniors or People with a Disability) 2004 was recently amended to apply to the subject site.

There are a number of concerns associated with the proposal including traffic generation, the suitability of the future built form, and the continued expansion of aged care facilities into rural land, as outlined below.

• **Traffic Generation**

Old Northern Road is a Classified Road, and any future development application requiring a new access onto Old Northern Road will require the concurrence of the Roads and Maritime Services. However, insufficient information has been provided to assess the potential traffic generation associated with the proposal. A Traffic and Parking Study that identifies anticipated traffic generation, including the number of vehicles (staff, residents, deliveries etc) that will utilise any proposed Old Northern Road intersection should be submitted for comment.

In addition, proposed road design plans showing future road and intersection upgrades are required. Concern is raised regarding the proximity of the proposed new access point on Old Northern Road to the Gilbert Road intersection and the potential for vehicle conflicts, particularly as there is a merge lane in close proximity to the subject site.

- **Future Built Form**

Future development on the site will comprise of a mix of one and two storey self-care dwellings, several two and three storey self-care apartment buildings and a part two/ part three storey residential care facility. Elevations of the proposed development have not been submitted for comment. Concern is raised regarding the suitability of apartment style development on rural zoned land, which could create a precedent for surrounding sites. The design of future development on the site should reflect the low density, rural character of the area. It is also important that the design, built form and road access integrates well, and is compatible with, potential future land uses within the South Dural Precinct. Further, the siting of future buildings should provide an appropriate setback to Old Northern Road to allow high quality landscape screening.

There are a number of other details that have not been addressed which would allow a more comprehensive assessment of the impacts of the development proposal, including a flora and fauna report, landscaping and fencing plan (for land in the vicinity of Old Northern Road) and plans showing building elevations and setbacks to Old Northern Road. Further, it is noted that Sydney Water raised some concern regarding the potential for odour impacts arising from a lengthy private sewer main that may be required for the proposed development. Documentation to confirm that there will be no such adverse impacts on Hills Shire residents would be required to accompany a development application.

Concern is raised regarding the encroachment of aged care facilities into rural zoned land. State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 aims to increase the supply and diversity of dwellings that meet the needs of seniors or people with a disability by making efficient use of existing infrastructure and services. Whilst there is demand for aged care services and residential care facilities in appropriate locations to meet the needs of an ageing population, given the abovementioned concerns Council objects to the issue of a Site Compatibility Certificate for the proposed development. It is also recommended that the Department of Planning and Environment consider options to close the 'loophole' in legislation that, in effect, allows the unintended and piecemeal expansion of residential aged care facilities into rural land.

Thank you for the opportunity to comment on the proposal. Please contact Bronwyn Inglis, Senior Town Planner, on 9843 0530 if you require any additional information.

Yours faithfully



Brent Woodhams
FORWARD PLANNING COORDINATOR