

THE HILLS SHIRE COUNCIL

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7 December 2017

Mr Stuart McIntosh
Planning Officer, Sydney Region West Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Our Ref: FP231

Dear Mr McIntosh

Application for a Site Compatibility Certificate – SEPP (Housing for Seniors or People with a Disability) 2004 – 9 Old Glenhaven Road, Glenhaven (Lot 100 DP 1230439)

I refer to your letter dated 16 November 2017 seeking comments with respect to an application for a Site Compatibility Certificate for seniors housing at 9 Old Glenhaven Road, Glenhaven (Lot 100 DP 1230439). The subject proposal involves an extension to the existing Living Choice Glenhaven Retirement Community, located at 15 Old Glenhaven Road, Glenhaven (Lot 312 DP 1215810). The proposed extension involves no more than 140 attached villas and low rise apartments along with 15,900m² of existing vegetation to be retained.

The subject site is zoned RU6 Transition under The Hills Local Environmental Plan 2012. While seniors housing is not permissible in the RU6 Transition Zone, the property is located opposite land zoned R2 Low Density Residential and may therefore seek a site compatibility certificate under the SEPP.

There are a number of concerns associated with the proposal including site configuration, continued expansion of seniors housing onto rural land, suitability of built form in the surrounding locality, traffic generation, bush fire threats and the ability to provide a full range of services to residents. These issues are outlined in further detail below.

- **Site Configuration**

The subject site is configured in an L-shape, allowing the lot to wrap around to the rear of the existing seniors facility. In addition, the site area is in excess of 5 hectares. This lot configuration allows for significant encroachment along the urban fringe resulting from a mere 45m frontage that adjoins urban land. The proposed development further extends the distance between residents located at the rear of the site and the local services they may reasonably require access to. If the proposed extension were to be approved, the site would have a total depth of almost 400m from Old Glenhaven Road, which is concerning for the accessibility and mobility of residents within the facility.

- **Continued Expansion of Seniors Housing onto Rural Land**

The Hills Shire Council is one of the local government areas most significantly impacted by permissibility of seniors housing as the Shire comprises an extensive urban-rural interface. Council has repeatedly raised concerns regarding the encroachment of seniors housing into the

Metropolitan Rural Area and it is an outstanding issue that continues to affect the low density rural residential character of the urban fringe. The scope of the land applicable to the SEPP is defined as "*land zoned primarily for urban purposes or land that adjoins land zoned primarily for urban purposes*". This is problematic as it allows the provision of seniors housing developments on rural land that adjoins urban land throughout the Shire, effectively extending the urban interface often into significant vegetation corridors.

Recently exhibited changes to Site Compatibility Certificates were welcomed; however the proposed legislative amendments did not go far enough to stop encroachment from happening. Examples such as this development demonstrate how encroachment may continue to occur along with its associated impacts. A common justification for development of this nature is that the subject land is no longer fit for agricultural purposes. However, the impacts of this development are not confined to the agricultural potential of the area, but that the dominant built form is disturbing the low density rural-residential character of the locality. The justification of agricultural potential is therefore considered unsatisfactory in determining the full extent of the impact of this type of development on the rural fringe.

- **Suitability of Built Form in Surrounding Locality**

The built form proposed by this development is not suitable for the existing low density rural residential character. In addition to having an extensive existing building footprint of 11.4 hectares, the proposed building typology for the extension to the facility comprises two (2) storey villas and low rise apartments. The total proposed footprint of the extension is approximately 2.9 hectares. The site area and built form proposed results in a substantial increase in density, particularly in addition to the current building footprint on site. While it is acknowledged that residents looking to downsize wish to remain in the rural area, the scale and built form of development on these sites results in a density that frequently exceeds the density of the surrounding businesses and services of the local centre.

- **Traffic Generation**

The Glenhaven locality, particularly along Glenhaven Road has significant issues with the demand generated by current traffic volumes. The Site Compatibility Certificate process undermines local zone hierarchies and planning instruments and allows unplanned growth to occur on rural land that adjoins urban land. This intensification of land use is not aligned with the required infrastructure provision, and exacerbates existing local issues, particularly traffic in Glenhaven.

- **Bush Fire Threats**

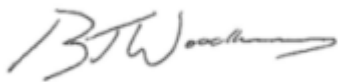
Concerns are raised for the bush fire safety of the site as the proposed extension encroaches onto an extensive vegetation corridor. Elderly residents are considered to be a vulnerable community and have greater difficulties associated with their evacuation procedures in the event of an emergency. The proximity to dense vegetation raises concerns for the ability of residents to respond appropriately to an emergency event, particularly within the apartment typology.

- **Ability to Provide Full Range of Services to Residents**

Seniors housing developments are permitted on the rural fringe where the facility is within close proximity to local shops. However, small rural town centres often fail to provide a full and diverse range of services that senior residents may regularly require such as medical services, post offices, banks, retail shops, community services and recreation facilities. Additional demand is generated from local centres with the continued expansion of existing facilities in rural localities. This is particularly relevant for the Glenhaven locality which has seen the expansion of seniors housing developments on the urban fringe which has become dependent on a small 2000m² local centre that does not comprise the full range of services that senior residents may reasonably require access to.

Thank you for the opportunity to comment on the planning proposal. Please contact Kayla Atkins, Town Planner, on 9843 0404 if you require any additional information.

Yours faithfully

A handwritten signature in black ink, appearing to read 'B Woodhams', with a stylized flourish at the end.

Brent Woodhams
FORWARD PLANNING COORDINATOR