

9 June 2016

Department of Planning and Environment
PO Box 5475
WOLLONGONG NSW 2520

Email to: mark.parker@planning.nsw.gov.au

Dear Mark,

SUBMISSION – APPLICATION FOR SITE COMPATIBILITY CERTIFICATE
BLACKTOWN WORKERS' SPORTS CLUB – 170 RESERVOIR ROAD, ARNDELL PARK

Thank you for the opportunity to comment on the above application. Having considered the documentation provided by the Department on 3 May 2016 and the compatibility of the proposed development with surrounding land uses, Council provides the following comments.

1.0 NATURAL ENVIRONMENT AND EXISTING/APPROVED USES

This section provides comments in relation to the natural environment and the existing uses and approved uses of land in the vicinity of the proposed development.

1.1 Traffic and parking

Having considered the Traffic Impact Assessment prepared by Traffix dated February 2016, Council agrees that additional traffic generated by the proposal can be accommodated within the existing road network capacity. However, the proponent must:

- i. Provide vehicular access into the seniors living development for residents and visitors off Reservoir Road via the main access point into the Club site. The current proposal provides for at least 6 driveways off Penny Place, including a *porte corche* driveway. Council does not support this access arrangement as it is likely to create traffic issues

with the industrial estate located directly to the south. The only access that should occur off Penny Place is for emergency vehicles and service vehicles. Entry to the basements of the various units is to be via the internal access road within the site and not direct off Penny Place

- ii. Provide traffic lights for the Reservoir Road access to ensure safe right-turn movements and improve safety for all users, including pedestrians and cyclists. The traffic light intersection must comply with NSW Roads and Maritime standards
- iii. The proposal must comply with the car parking requirements set out in the *State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004*. Based on the nature and scale of the proposed development, the Applicant would need to provide 272 car parking spaces in total; however, the current proposal only provides 227 car parking spaces. Therefore, there is a shortfall of 45.

1.2 Engineering requirements

Any future development application must comply with Council's *Engineering Guide for Development* which is available on Council's website. Specific attention should be applied to site drainage, access, on-site detention and stormwater water quality treatment.

1.3 Waste management

Any future development application in relation to the proposal must be supported by a Waste Management Plan for the demolition and construction stages of development, and the ongoing use of the site. The Plan must demonstrate that there will be adequate waste service provision including removal from each unit, storage and collection. In developing this Plan, the Proponent is to consider the following requirements:

- i. Bin collections must be onsite either from the basement or from an onsite, ground level loading bay
- ii. All truck maneuvering must be accommodated onsite to allow for forward in, forward out movement of collection vehicles – no reversing into or out of the site will be supported
- iii. Access to be based on a medium rigid vehicle with a 4.5m headroom allowance
- iv. Truck access to comply with the Australian Standards (AS2890.1 and AS2890.2) for ramp grades and headroom allowances

- v. Separate waste storage areas are to be provided for the various uses onsite (e.g senior living development and childcare centre)
- vi. Waste storage rooms should be provided for each building.

2.0 IMPACT ON FUTURE USES

This section provides comments in relation to the impact that the proposed development is likely to have on likely future uses of the land.

2.1 Temporary loss of sporting fields

It is noted that the construction of the proposed seniors living development would require the demolition of existing sporting fields which are proposed to be relocated to the north-west of the site. It is recommended that the fields are relocated prior to the demolition of the existing fields as Council does not have any other sporting fields available for use by the sports teams that currently use the Club's fields. Should this recommendation not be adopted, the teams will be without sports fields for at least one season.

3.0 SERVICES AND INFRASTRUCTURE

This section provides comments in relation to the services and infrastructure that are or will be available to meet the demands arising from the proposed development and any proposed financial arrangements for infrastructure provision.

While Council agrees that there is a need for affordable accommodation for the over 55s population within the Blacktown local government area, including this particular location, there are concerns about the availability of services and infrastructure as set out below.

Given the large number of residents associated with the proposed development, including elderly residents with dementia and limited mobility, it is vital that adequate services and facilities are available in close proximity to the site and can be easily accessed.

3.1 Retail and medical services

There is a lack of existing retail and medical services within close walking distance of the proposed development. Therefore, we support the recommendation for a small medical facility and/or convenience retailing on the site to meet the needs of the incoming residents. We also recommend the developer consults with NSW Health (Western Sydney Local Health District) and Wentwest about the capacity of Blacktown Hospital, General Practitioners and

after-hours medical care to meet needs of any future residents of the individual living units and residential aged care facility.

3.2 Transport

We do not agree with Social Infrastructure Audit insofar as it states that there are good transport connections to facilities nearby. Any future development application must be supported by a Statement of Environmental Effects that addresses the following questions.

- i. Does Blacktown Community Transport have capacity to offer a community bus service available for Independent Living Unit residents only?
- ii. Is the Independent Living Unit identified as an aged care facility?
- iii. The study states BWSC operates a 16 person shuttle from the sports club to their main club in Blacktown Centre approximately 15-20 times a day. Will this service continue and will it be available for use by all incoming residents?
- iv. Would it be possible to expand the above service and include Blacktown Hospital, Marcel Crescent (community health services), Westpoint, Blacktown CBD retail and medical services in Campbell Street?
- v. Can we please have further details about the accessibility of the shuttle service and whether or not it includes storage area for walkers etc.?
- vi. Can we please have confirmation from Sydney Buses that they will be willing and able to expand services if there is significant demand generated by the development?

3.3 Community facilities

Council supports the proposal insofar that it includes a range of community facilities to provide for the social needs of incoming residents and promotes health and active ageing including:

- i. Onsite supported common open space with seating and barbeque facilities for use by incoming residents
- ii. The BWSC site provides passive recreation opportunities for walking and cycling along Bungarribee Creek
- iii. A small shopping or medical centre, dedicated swimming pool, four dedicated community facility tenancies which may include an on-site library, activity and games room or cinema room, Sports Centre of Excellence and associated sporting fields and sports related practices including physiotherapy
- iv. Dedicated swimming pool and wading pool for children

- v. A child care centre which could cater to a total of 130 children, located as close as possible to the existing outdoor club dining area. This is a positive inclusion to link the proposed development with family and or the wider community.

3.4 Accessibility

Council also supports the following recommendations to improve accessibility and further meet the needs of the incoming population:

- i. Access consultant or the architect to confirm the proposed site design complies with the gradient requirements and the definition of a suitable access pathway within the Seniors Housing SEPP
- ii. A Welcome pack to be given to all new residents that provide details on where services are located and how to access them. Documents including bus timetables, community shuttle details, seniors' services details, BWSC membership, any details of services provided on the site, or the like
- iii. Explore whether a dedicated community shuttle for residents only could be provided from the site to Blacktown Centre and associated hospitals
- iv. Explore opportunity of working with Blacktown Community Transport Incorporated to provide shuttle services.

3.5 Developer contributions

Any future development application for the proposed seniors living development would be subject to Council's Section 94 Contributions Plan No.1 – 1980's Release Areas.

4.0 OPEN SPACE AND SPECIAL USES

This section provides comments in relation to 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.

4.1 Common open space within the development

Full compliance with the requirements of the *State Environmental Housing Policy (Housing for Seniors and People with a Disability) 2004* is required. Council will not consider any variations to the required common open space. In view of the large number of seniors living units proposed the development needs to include substantial community facilities and activities to cater for the special needs of the elderly including persons with dementia and to

provide suitable transport so that residents can access other facilities and services in the community.

4.2 Site B - Building and Units

In terms of landscaping of the private passive recreation open space, the proponent would be required to cater for the following:

- Intergenerational play spaces for senior citizens
- Park furniture – seating, picnic shelters
- Circuit paths
- Shade trees and associated landscaping works
- Community art - to interpret the play space, environment or historic aspects.
- Disability access
- Water Sensitive Urban Design treatments
- Outdoor fitness stations, as suitable.

4.3 Connectivity and landscaping

The development should provide a good connection and standard of pathways that link the buildings to the various other facilities on the site with quality landscaping and outdoor recreation areas.

It is important to provide for an internal shared path that links Site B (building and units), future sports facility, Workers' Club site and Site A (sportsground and grandstand). It is also recommended that Site A sportsgrounds are connected by means of a bridge through riparian corridor/Reserve 754. It is also important to link the whole site with wider open space network by means of shared/bike paths.

4.4 Increased demand for quality open space in the locality

The projected population increase will create demand on quality open space within the locality. While the proposal provides for active and passive recreation facility for its existing members with the proposed relocation/replacement of the exiting sporting facilities, additional open space is required for members of the public who will accommodate the proposed development. Council supports the suggestion that the Proponent contributes to the upgrade of Reserve 740 active reserve and surrounding local parks including walking and cycling tracks. Council's Recreation Planning and Design section would be pleased to meet

with the applicant and Development Services Unit officers to discuss this opportunity prior to any development application being lodged for the sports ground proposal at Site A.

4.5 Reservoir Road

As per Council's Bike path plan, Reservoir Road is demarcated as a state link. Council's Eyes on Blacktown Strategy also identifies Reservoir Road as an important link for entry/ exit to the Blacktown city. RPD recommends that appropriate streetscape landscaping treatment be carried out by the applicant, in line with Council's Eyes on Blacktown Strategy. Council's Recreation Planning and Design section would be pleased to meet with the applicant, Council's Street Tree section and DSU officers to determine the appropriate street frontage landscape requirements.

5.0 BULK, SCALE, BUILT FORM AND CHARACTER

This section provides comments in relation to 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.

5.1 Ensuring good design outcomes

The proposed seniors living development will be required to achieve good design outcomes in accordance with *State Environmental Planning Policy No. 65 (Design Quality of Residential Apartment Development)* and the associated *Apartment Design Guidelines*, as well as the *State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004* to ensure the development provides good amenity for future residents of the site and those in surrounding neighbourhoods, and to avoid overdeveloping the site.

5.2 Special considerations to protect and enhance amenity

To minimise potential visual and acoustic impacts on the proposed development and surrounding land uses and to protect and enhance amenity both on and around the site, the Proponent will be required to:

- i. Ensure building heights on the eastern end of the site are in keeping with the two-storey housing on the eastern side of Reservoir Road, and then graduating building heights so that any higher buildings are located at the western end of the site.
- ii. Provide suitable privacy and acoustic treatments to the facades of any residential buildings facing the adjacent industrially zoned land

- iii. Provide suitable landscaping to any walls of the seniors living development that adjoin the industrial area to create an attractive amenity and outlook for the residents of the seniors living development
- iv. Avoid blank walls where industrial development abuts the site and provide suitable architectural treatments to walls and landscaping around buildings to minimise the visual impact of such walls
- v. Update the acoustic report to factor in noise to be created by the future proposed sporting stadium and sports fields as well as noise from the surrounding industrial area and traffic noise
- vi. Take into consideration the reflectivity and glare off the roofs of industrial buildings when designing the seniors living development particularly when hit by the western sun.
- vii. Also factor in any glare and light spillage from the proposed stadium and sporting field lights on the seniors living units and their outdoor balconies particularly if this is high wattage type lighting on tall poles.

6.0 NATIVE VEGETATION

Not applicable. The development does not involve the clearing of native vegetation subject to the requirements of section 12 of the *Native Vegetation Act 2003*.

Should you require any further information in relation to this matter, please contact Council's Acting Team Leader Planning Policy, Sarah Sheehan on 9839 6094 or sarah.sheehan@blacktown.nsw.gov.au

Yours faithfully,



Trevor Taylor

Manager Development Policy