

Report to the Sydney Western City Planning Panel on an application for a site compatibility certificate – State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

SITE: The site compatibility certificate (SCC) proposal is located at 50 Raby Road, Gledswood Hills (Part Lot 50 DP 1221870). The land has an area of approximately 1.38ha (refer to Figure 1 below) and is part of the larger Lakeside Golf Club in Camden.



Figure 1: Site context.

The Lakeside Golf Club (Lot 50 DP 1221870 and Lot 101 DP 1206855) is approximately 100ha and bounded by Camden Valley Way to the north, Raby Road to the east, the Sydney Water Upper Canal to the south and rural land to the west. The club site contains a club building, an 18-hole golf course, a car park and four large dams. The remaining portions of the land form part of the Camden Lakeside Development (Lot 101 DP 1206855), which is zoned R1 General Residential and is yet to be constructed. A TransGrid transmission line and Rileys Creek traverse the site.

The land to the east of the site is Emerald Hills Estate, which was rezoned in 2014 and is proposed to deliver approximately 1200 dwellings. The El Caballo Blanco/Gledswood Hills Precinct is located to the south and west of the site and was recently rezoned to provide approximately 860 dwellings, a golf course and the restoration of the state heritage-listed Gledswood Homestead. To the north of the site is the Catherine Field Precinct in the South West Growth Area, which is zoned rural. Refer to Figure 2 (below) for the proposed development of the surrounding area.



Figure 2: Proposed development of surrounding area.

APPLICANT: The applicant is Hawes & Swan Town Planning Consultants Pty Ltd on behalf of Narellan Property Holdings Pty Ltd.

PROPOSAL: The SCC application (**Attachments B1–B6**) seeks to enable the development of a seniors housing village at the site. The proposed concept plan for the village includes the following development (refer to Figure 3 below):

- 99 self-contained dwellings comprising:
 - 72 apartments within three two-storey apartment buildings; and
 - 27 single-storey villas within 13 attached dwellings and a single detached dwelling;
- basement-level car parking (number of spaces unspecified);
- a community facility building and a multipurpose hall;
- a single-storey café; and
- landscaping and open space.



Figure 3: Proposed concept plan.

LGA: Camden

PERMISSIBILITY STATEMENT

The site is zoned RE2 Private Recreation under the Camden Local Environmental Plan (LEP) 2010 (refer to Figure 4 overleaf). Seniors housing is not permitted in the RE2 zone.

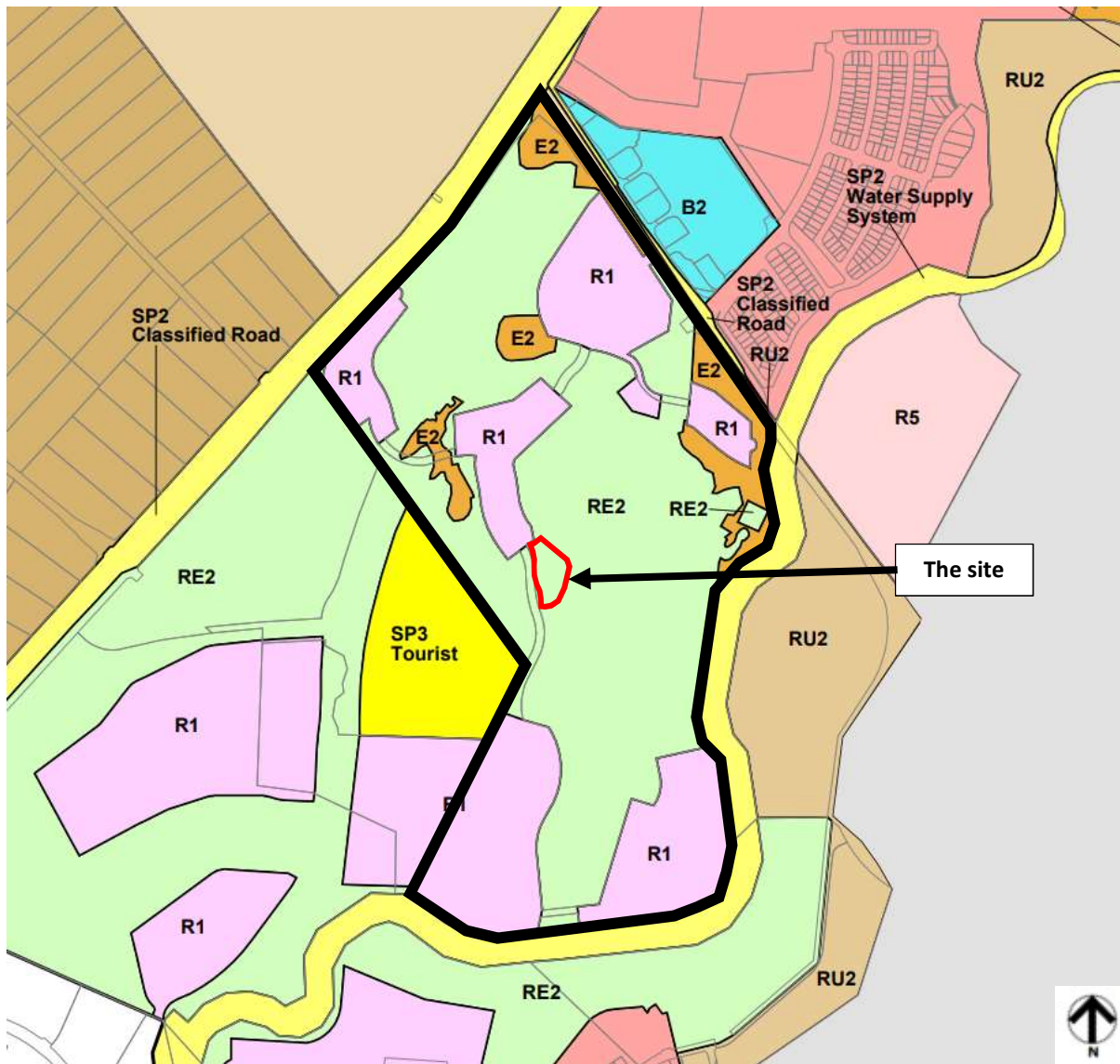


Figure 4: Land zoning map extract.

Clause 4(1) of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors Housing SEPP) provides that the SEPP applies where the subject land adjoins land zoned primarily for urban purposes, but only if the land is being used for the purposes of a registered club (i.e. clause 4(1)(b)). An SCC can be issued for the site because:

- the site immediately adjoins land to the north that is primarily zoned for urban purposes, being R1 General Residential, which permits the development of dwelling houses;
- the site is being used for the purposes of a registered club, identified as Lakeside Golf Club – Camden with licence number LIQC30010007 issued by the Independent Liquor & Gaming Authority; and
- the land is not identified by any exclusions listed in schedule 1 of the SEPP.

Camden Council noted that the site does not comply with clause 4(1)(b) of the Seniors Housing SEPP due to its distance from the clubhouse building, which is approximately 330m from the proposed site in a direct line (page 2, **Attachment C2**).

Council also referred to clause 4(5)(b) of the SEPP, which provides that land being used for the purposes of a registered club cannot be treated as being land zoned primarily for urban purposes unless the consent authority is satisfied that most of the land it adjoins is land zoned for urban purposes.

While the separation of the clubhouse from the site is acknowledged, the SEPP does not prescribe a minimum or maximum distance.

Furthermore, the application is not dependent on the club site being treated as land zoned primarily for urban purposes as the site adjoins land zoned for urban purposes.

PREVIOUSLY ISSUED SITE COMPATIBILITY CERTIFICATE ON THE LAND

An SCC has not been previously issued for the subject site.

PROXIMITY OF SITE TO WHICH THERE IS A CURRENT SITE COMPATIBILITY CERTIFICATE, OR AN APPLICATION HAS BEEN MADE BUT NOT YET DETERMINED

There are no issued SCCs or undetermined SCC applications within a 1km radius of the site.

CLAUSES 24(2) AND 25(5)

The panel must not issue a certificate unless the panel:

- (a) has taken into account any written comments concerning the consistency of the proposed development with the criteria referred to in clause 25(5)(b) received from the general manager of the council within 21 days after the application for the certificate was made;
- (b) is of the opinion that:
 - (i) the site of the proposed development is suitable for more intensive development; and
 - (ii) the proposed development for the purposes of seniors housing is compatible with the surrounding environment and surrounding land uses having regard to the criteria specified in clause 25(5)(b).

CLAUSE 25(2)(C)

A cumulative impact study has not been prepared as there are no issued SCCs or undetermined applications for an SCC within a 1km radius of the site.

COUNCIL COMMENTS

The Department of Planning and Environment received comments on the SCC application from Council. Council's report is at **Attachment C1** and its submission is at **Attachment C2**.

Council raised concerns regarding: the location of the development within the Lakeside Golf Club site; gradients along access pathways; access to public transport and other services; and overdependence on the construction of a new road.

In summary, Council opposes the development for the reasons below.

Consistency with the SEPP

Council considers that the Seniors Housing SEPP does not apply to this application as the site is isolated from the clubhouse (there is a 330m distance in a direct line from the proposed development site to the clubhouse).

Council notes that most of the land adjoining the site is zoned RE2 Private Recreation and only a minor portion of the boundary of the site adjoins the R1 General Residential-zoned land.

Surrounding land uses

Council advised that the surrounding RE2-zoned land provides for private open space and/or recreational purposes, with permitted land uses being compatible with the protection and enhancement of the natural and recreational environment.

There is also land within the surrounding area that is zoned for residential purposes, providing for a mix of housing.

Access to services

Council is concerned with the heavy reliance on the development of a new road, i.e. Golf Course Drive, to provide access from the site to Raby Road. There is no certainty that the road will be delivered within two years in accordance with the SCC time frame.

While consent has been issued for the development of a neighbourhood centre in the nearby Emerald Hills Estate (east of the site), the time frame for completion of the centre is unknown, thereby limiting access to services in the immediate future.

The site is relatively distant from other services and facilities, necessitating adequate transport services, and the current bus services are limited during the weekend.

The site does not comply with the access requirements of the Seniors Housing SEPP, which states that a seniors housing development must not be more than 400m from public transport services via a suitable pathway. Council notes the location of the site does not meet the access requirements as follows:

- the site is approximately 500m from Raby Road and approximately 570m from Camden Valley Way;
- there is no road or an accessible pathway from the site to either Raby Road or Camden Valley Way;
- bus stops on Raby Road and Camden Valley Way have limited services on the weekends; and,
- the nearest shops, banks and medical centres are in Gregory Hills, approximately 2.8km away, and the Emerald Hills neighbourhood centre is not constructed.

Visual impacts

Council considers there are unacceptable visual impacts on a key viewpoint from the state heritage-listed Gledswood Homestead west of the site. Residential boundaries within the broader golf course site have been introduced to maintain the landscape's visual importance and protect identified view corridors, and there is uncertainty over whether the proposal would encroach on key viewpoints, particularly from the state heritage item.

Council considers the proposed development would be better positioned near the clubhouse to better use the club's facilities, thereby reducing the scale of the development and resulting in a reduced visual impact on Gledswood Estate and view corridors.

Applicant's response to Council comments

The applicant provided a response addressing Council's concerns (**Attachment E**) as follows:

Consistency with the SEPP

The proposed location is suitable as it adjoins land zoned for urban purposes and contains a registered club. It is argued that the distance between the registered club and the proposed development is not a consideration under the SEPP.

SCCs have been issued for another seniors housing development on the Castle Hill Country Club Golf Course, which does not immediately adjoin a registered club.

Surrounding land uses

The development does not adversely impact on existing or approved developments in the locality and the site will continue to operate as an 18-hole golf course. The maximum height of the proposed buildings is in keeping with future residential dwellings in the area and is of a similar scale to other seniors housing developments on golf courses.

Access to services

The applicant states that the site is proven to be suitable for accommodating a seniors housing development that would provide high-quality housing on a golf course near a range of services and facilities. Primarily, the following is offered in support:

- the bulk and scale of the development is comparable to that of other seniors housing developments approved on golf course land;
- the imminence of a proposed internal road network;
- in the interim, a shuttle bus service will be available to transport residents to surrounding services/facilities; and
- a large-scale hospital and medical facilities are under construction in Gledswood Hills and development of the adjoining Emerald Hills suburb is already underway, with the town centre likely to be completed within the next two years, providing residents with nearby services.

Consequently, the development will provide adequate access to services, infrastructure and facilities.

Visual impacts

The proposal does not result in unacceptable visual and/or heritage impacts, recognising a moderate visual impact on the Gledswood Homestead heritage item that may be ameliorated by proposed landscaping.

Comments from adjoining landowner

SJB Planning, on behalf of SH (Sekisui House) Lakeside Pty Ltd (landowners of the Camden Lakeside Development), submitted comments on the proposed seniors housing development (**Attachment F**) following Council's Meeting as outlined below:

- the proposed location is not in a precinct nominated for development, noting Council's policies and strategic intent for the Camden Lakeside Development being set around the careful balance of built form and landscaped outcomes;

- the proposal contravenes the site-specific outcomes and objectives for the site, as well as intended objectives for the RE2 Private Recreation zone;
- the proposal disregards the character and outcomes for the Camden Lakeside Development, diminishing the ability of the development across the site to align with Council's LEP and development control plan;
- the scale and location of this proposal, being outside nominated residential development precincts, further places increasing pressure on the setting and heritage significance of the adjoining state heritage-listed Gledswood Homestead; and
- there is no road access to the part of the site on which the SCC is sought, and this is the wrong land use in the wrong location.

SUITABILITY OF THE SITE FOR MORE INTENSIVE DEVELOPMENT

The panel must not issue a certificate unless the panel is of the opinion that the site of the proposed development is suitable for more intensive development (clause 24(2)(a)):

1. The site of the proposed development is suitable for more intensive development (clause 24(2)(a))

The proposed seniors development is in the centre of the Lakeside Golf Club site (refer to Figure 2 on page 2 of this report) and has an area of approximately 1.38ha. The proposed seniors development will be located within the golf course.

The Lakeside Golf Club site is bounded by Camden Valley Way to the north, Raby Road to the east, the Sydney Water Upper Canal to the south and rural land to the west. The club site is approximately 100ha and contains a club building, an 18-hole golf course, a car park and four large dams. The club site also contains the Camden Lakeside Development, which is zoned R1 General Residential and is yet to be constructed. In addition, a TransGrid transmission line and Rileys Creek traverse the site. There are two access points to the club site via Raby Road.

The surrounding land is predominantly rural land transitioning to urban uses. The land to the east of the site is Emerald Hills Estate, which was rezoned in 2014 and is proposed to deliver approximately 1200 dwellings. The El Caballo Blanco/Gledswood Hills Precinct is located to the south and west of the site and was recently rezoned to provide approximately 860 dwellings, a golf course and the restoration of the state heritage-listed Gledswood Homestead. To the north of the site is the Catherine Field Precinct in the South West Growth Area, which is zoned rural. Refer to Figure 5 (overleaf) for an aerial view of the undergoing development of the surrounding area.

The Department considers that the site of the proposed development may not be suitable for more intensive uses until adjacent residential development is constructed to enable access to the site and delivery of associated utility services. The following concerns are raised with the intensification of the site:

- there is a reliance on the provision of an internal road (Golf Course Drive) by the adjacent Camden Lakeside Development for access to the proposed seniors housing development. However, there is no certainty regarding the timing of this proposed new road. Council has not received a development application for the construction of the internal road or the residential precinct directly adjacent to the SCC proposal;

- the proposal does not comply with the access requirements of the Seniors Housing SEPP as follows:
 - the site is approximately 794m from the nearest bus stop, which is more than the required 400m distance from public transport services; and
 - the site does not have a road or an accessible pathway from the site to either Raby Road or Camden Valley Way;
- access to utility services such as water, sewerage and electricity is based on the extension of these connections from the surrounding areas once they are developed for residential purposes. However, the timing of these services is unknown; and
- there are visual impacts of the proposed seniors housing development on the adjacent state heritage-listed Gledswood Homestead, which are inconsistent with the Gledswood Conservation Management Plan (September 2011).

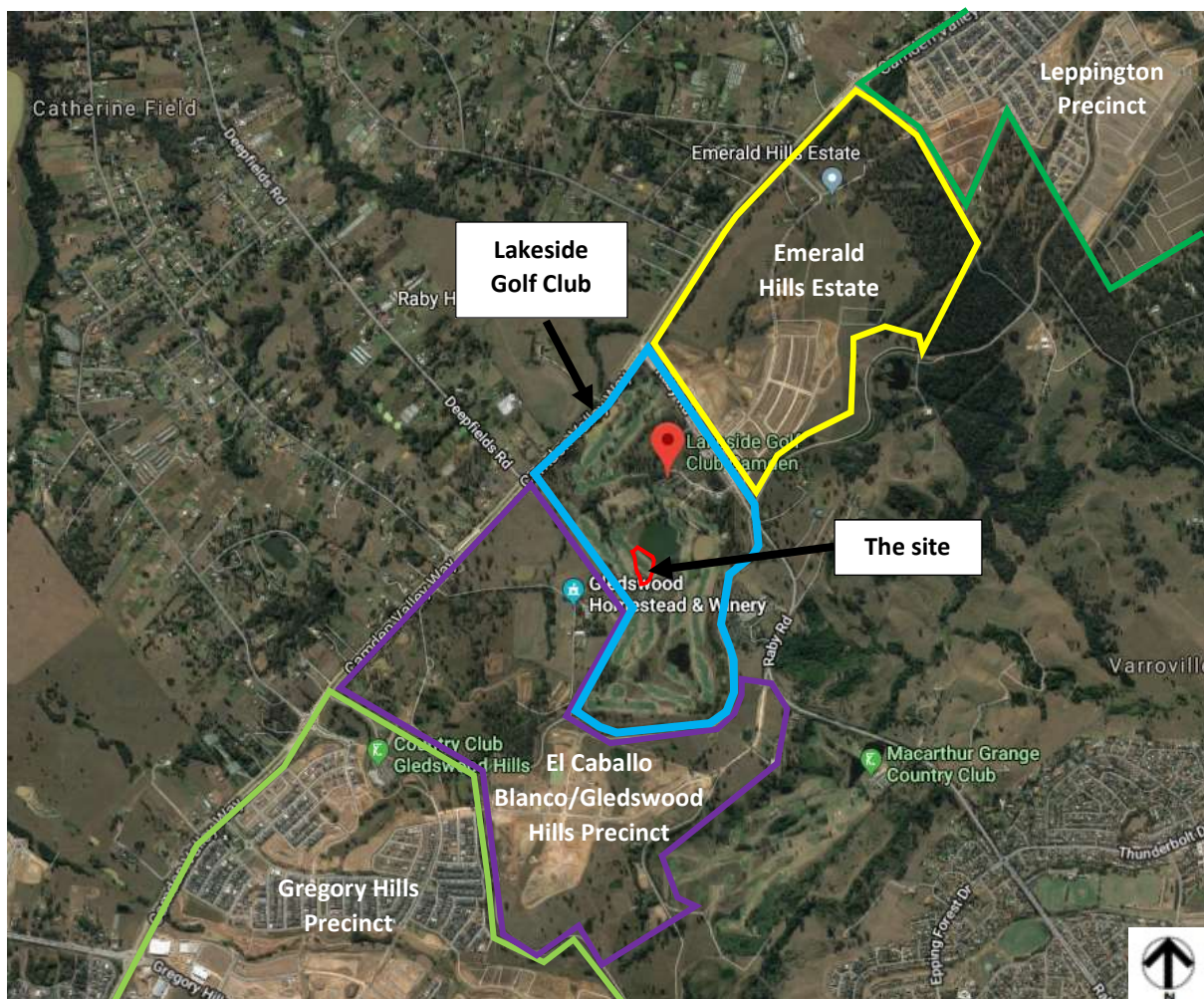


Figure 5: Undergoing development of the surrounding area

In regard to heritage, Council has drawn attention to the planned residential development of the wider Camden Lakeside Development. Council advised that the boundaries of the residential precincts were configured to maintain the landscape's visual importance and protect identified view corridors from the state heritage-listed Gledswood Homestead. Council also contends that the location of the SCC proposal would be better positioned near the clubhouse to better use the club's facilities,

thereby reducing the scale of the development and resulting in a lesser visual impact on Gledswood Homestead.

COMPATIBILITY WITH THE SURROUNDING ENVIRONMENT AND LAND USES

The panel must not issue a certificate unless the panel is of the opinion that the proposed development for the purposes of seniors housing is compatible with the surrounding environment and surrounding land uses having regard to the following criteria (clause 25(5)(b)) and clause 24(2)(b)):

1. The natural environment (including known significant environmental values, resources or hazards) and the existing and approved uses of land in the vicinity of the proposed development (clause 25(5)(b)(i))

Flora and fauna

The club site contains significant vegetation throughout the golf course including Shale Hills Woodland, Shale Plains Woodland and Alluvial Woodland.

However, the applicant has advised there is no significant vegetation within the area of the proposed seniors housing development as it has been cleared for the golf course purposes. Instead, the site is covered by exotic grassland as part of the golf course landscaping and does not contain Cumberland Plain Land Snail Habitat.

Bushfire-prone land

The site of the proposed seniors development is not identified as bushfire-prone land (refer to Figure 6 below). However, the club site contains bushfire-prone land (Vegetation Category 2 and Vegetation Buffer) in its northern, southern and eastern portions.

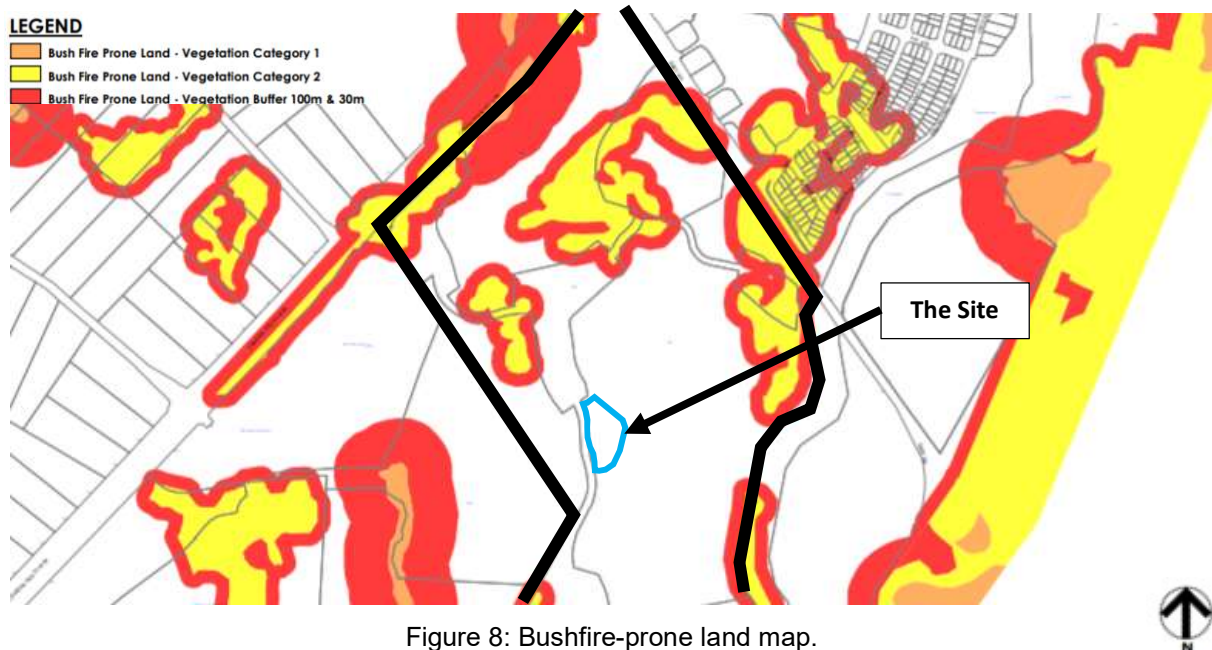


Figure 8: Bushfire-prone land map.

Slope constraints

The topography map suggests the site could be located within a flow path for stormwater runoff (refer to Figure 7 overleaf). A ridge line runs east to west and extends north, with a high point of 140m AHD to the south and east of the site.

The site of the proposed seniors housing development is approximately between level 100 to 110 AHD. The Department notes that if an SCC is issued then the matter of flooding could be appropriately addressed at the development application stage.

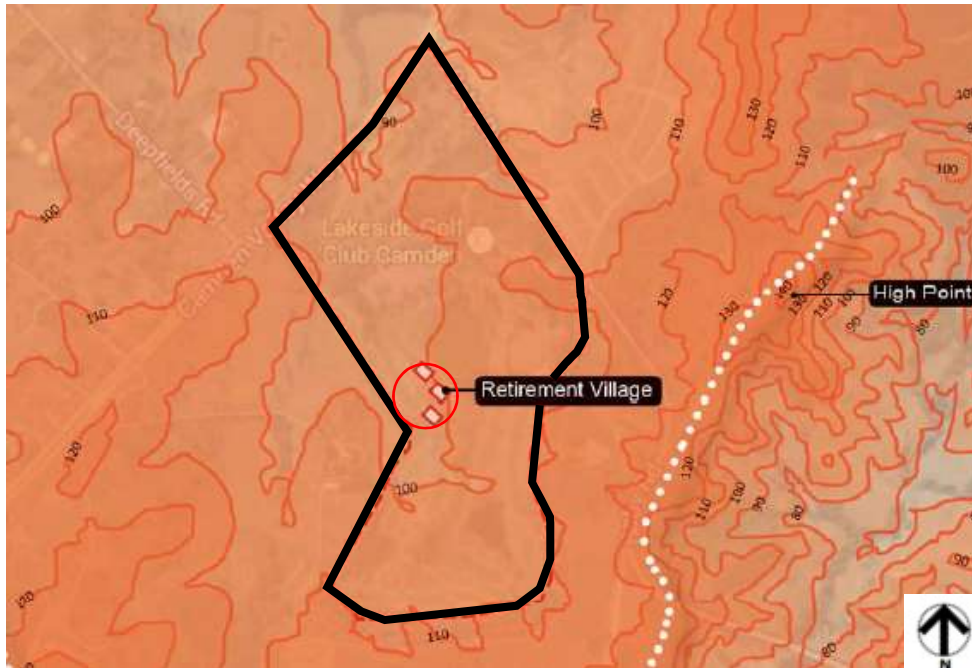


Figure 7: Topography map.

Flood-prone land

As shown in Figure 8 (below), the proposed seniors development adjoins the largest waterbody on the site.

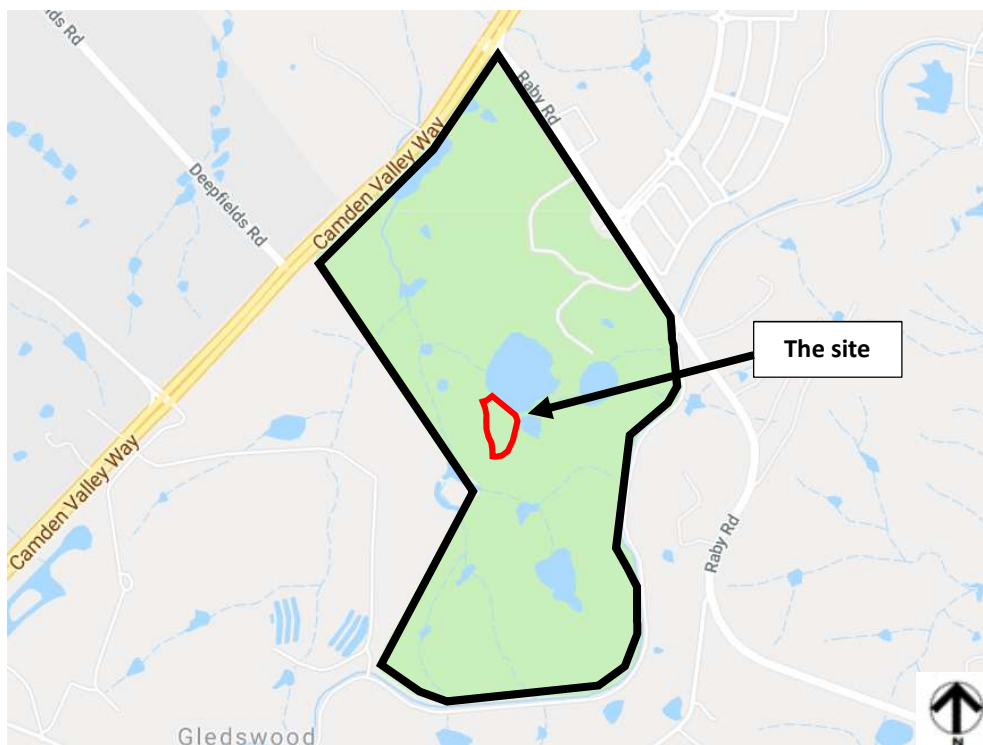


Figure 8: Map of waterbodies and watercourses.

Although the site is not identified as flood-prone land, a site inspection by Department staff indicated the site lies within a slight depression, which may lead to the possibility of localised flooding. It is unknown whether this dam is prone to flooding or the broader club site is subject to localised overland flows. This could be addressed as part of a development application should the panel decide to issue an SCC.

Other constraints

The SCC proposal has not considered on-site contamination and salinity. The Department notes that this can be addressed at the development application stage if an SCC is issued.

2. The impact that the proposed development is likely to have on the uses that, in the opinion of the Panel, are likely to be the future uses of that land (clause 25(5)(b)(ii))

Current land zoning

The site is zoned RE2 Private Recreation and the key objective of this zone is to provide land for public open space or recreational purposes. This zone permits (with consent) land uses such as: community facilities; function centres; kiosks; recreation areas and facilities; and registered clubs.

The proposal would have a minimal impact on the recreational use of the site as a golf course. The proposed seniors housing development would be located across two of the golf fairways and a slight reconfiguration of the fairways would be required.

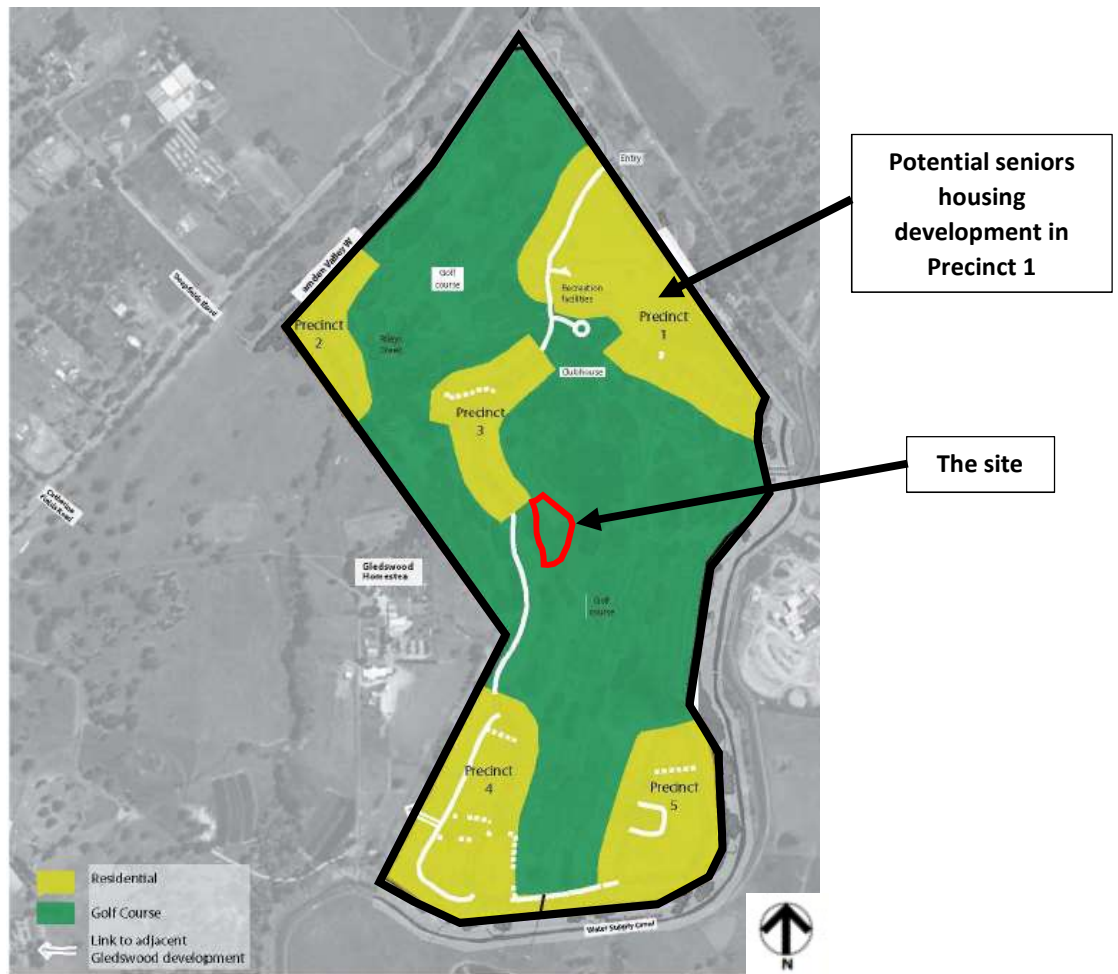
However, the SCC proposal would not have a negative impact on the continued use of the site as a golf course.

Adjacent residential development

As noted previously, the site adjoins the Camden Lakeside Development, which is zoned R1 General Residential and is yet to be constructed. This development provides for residential uses set among a golf course and clubhouse facilities and environmental assets, including watercourses and water bodies, and scattered remnant Cumberland Plain Woodland vegetation.

The Camden Council Development Control Plan (DCP) 2011 (**Attachment B6**) contains controls for the future subdivision and development of this residential land within the club site. The DCP identifies five residential precincts throughout the golf course (refer to Figure 9 overleaf). Council notes the DCP seeks to establish a framework for the provision of a diverse range of dwelling types, including options for seniors living and other housing types within Precinct 1.

Therefore, it is concluded that the Camden Lakeside Development (which contains the SCC site) has been strategically planned by Council to include the provision of future seniors housing in the proposed residential precincts. The proposal is not consistent with the identified future uses of the site.



3. 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 any proposed financial arrangements for infrastructure provision (clause 25(5)(b)(iii))

Retail and services

The site is approximately 6.3km from the Narellan town centre, 7.6km from the Minto village centre, 11km from Camden regional shopping centre and Camden Hospital, and 12km from Macarthur Square Shopping Centre. These centres contain a range of retail services including supermarkets and shops, medical services such as pharmacies and medical centres, banks, a post office, and food and drink premises.

In addition, a new local centre (i.e. Emerald Hills Shopping Centre) is proposed to be constructed within the Gledswood Hills Precinct approximately 2.8km north of the site along Raby Road. This centre may provide a range of services including medical, café and restaurants, and retail shops.

Therefore, there are adequate retail and series within the vicinity of the site and additional facilities will be provided in the future.

Public transport

The site is more than 400m from the nearest bus stop, which is located along Raby Road near the entrance to the golf course (refer to Figure 10 below). This bus stop is serviced by the 850 bus route, which operates 19 times daily between 8am and 6pm from Minto to Narellan from Monday to Friday, 10 times daily on Saturday and 9 times daily on Sunday and public holidays. The service also runs 17 times daily between 8am and 6pm from Narellan to Minto from Monday to Friday, 10 times daily on Saturday and 9 times on Sunday and public holidays.



Figure 10: Current path from the site to the bus stop.

Clause 26(2)(b) of the Senior Housing SEPP requires that a proposed seniors housing development be within 400m of a public transport service via a suitable access pathway which is sealed and safe for an electric wheelchair.

The Department notes the pedestrian pathway from the site to the bus stops is approximately 794m, which does not comply with this clause. The Department's Regional team conducted a site inspection and concluded that the gradient of the pathway to and from the bus stop on Raby Road and the site would not meet the 1:14 gradient requirements specified under clause 26(b)(iii) of the SEPP.

However, the concept plan for the proposed Camden Lakeside Development within the club site includes a future road (i.e. Golf Course Drive) which will mitigate these accessibility concerns. A bus route is also proposed along Golf Course Drive with a bus stop within 400m of the site (refer to Figure 11 overleaf), which would satisfy the distance requirement of clause 26, although the delivery of this new road and bus route is uncertain and dependant on the Camden Lakeside Development landowners. It is noted that the gradient of the future road is unknown as it is not part of the land owned by the applicant and no development application has been submitted for its construction.

The applicant advises that in the interim, a shuttle bus service is proposed to transport seniors housing residents to the bus stop on Raby Road. While this would assist, this arrangement does not satisfy or comply with the accessibility requirements of the SEPP as public transport services are not within 400m from public transport services via a suitable access pathway.

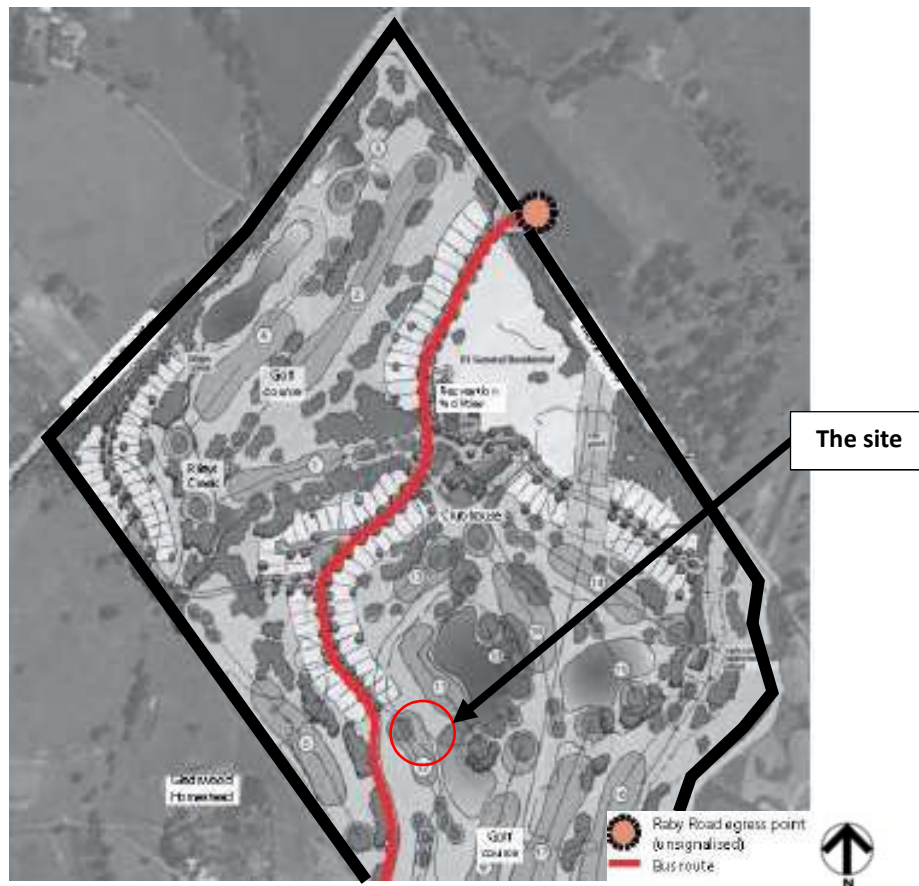


Figure 11: Proposed road and bus route in Camden DCP.

Access and traffic impacts

The Department notes that a traffic impact assessment has not been prepared to support the SCC proposal. It is anticipated that traffic movements generated by the proposal would have minimal impact on the surrounding road network. Should a certificate be issued, it is considered that this issue can be appropriately addressed at development application stage.

However, the Department notes that vehicle access to the proposed seniors development is reliant on the future internal road associated with the Camden Lakeside Development. Council has not received a development application for the construction of the internal road or the residential precinct adjacent to the SCC proposal.

Therefore, the SCC proposal would need to consider alternative vehicle access through the club site to the proposed seniors housing development until the road is constructed. The Department notes that this could cause additional issues in relation to the configuration of the golf course and impact vegetation on the wider club site.

Electricity, water supply and sewer facilities

The site does not have access to adequate electricity, water and sewer services. The applicant notes the site could access these utility services given the future residential precincts on the surrounding land.

However, the Department notes the time frame to construct the adjacent residential precincts is unknown and therefore the timing of connections to utility services for the proposed seniors development may be a concern.

4. 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 (clause 25(5)(b)(iv))

The proposed seniors development would only slightly reduce the area of private open space on the club site. The golf course would need to be reconfigured to accommodate the proposed development (refer to Figure 12) and, following the reconfiguration, the course will continue to operate as an 18-hole golf course, providing recreational opportunities for the residents of the proposed seniors development.

The site is near the Turner Road Precinct, which includes 77ha of open space, and the Catherine Field Precinct, which includes 50ha of open space, recreation and environmental conservation areas (page 34 of **Attachment B2**).

Therefore, although the SCC proposal would reduce the area of private open space within the club site, there is adequate open space provided in the vicinity.



Figure 12: Proposed golf course reconfiguration.

5. 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 (clause 25(5)(b)(v))

Bulk and scale

The surrounding future residential development has a maximum building height of 9.5m under the Camden LEP 2010. The seniors housing proposal comprises the following building types (refer to Figures 13 and 14):

- three two-storey apartment buildings;
- 12 single-storey attached or detached villas;
- a single-level of basement car parking;
- a single-storey community facility building and multipurpose hall; and
- a single-storey café.

From the cross-section plans in the concept and layout plan (**Attachment B3**), the two-storey buildings are proposed to have a building height of approximately 9m, including the roof.

The Department concludes that the bulk and scale of the proposed seniors development would be consistent with the built form of the future residential development in the area and the maximum building height of that land.

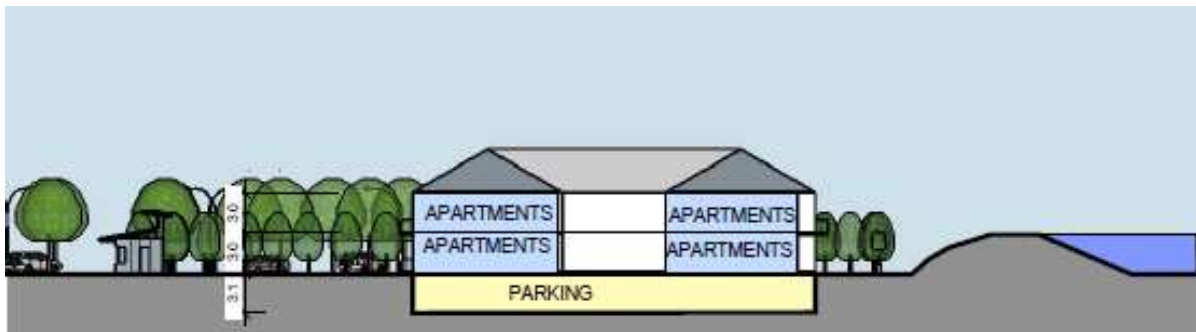


Figure 13: Cross-section extract.



Figure 14: 3D image of the proposed seniors development.

Impacts on the adjacent Gledswood Homestead

The site is located to the east of the State heritage-listed Gledswood Homestead (state heritage item I81) (refer to Figure 15 below) which is an Australian colonial farm with many of its original buildings intact from the early 1800's. The heritage item is supported by the Gledswood Conservation Management Plan (September 2011) (**Attachment G**) which was endorsed by the NSW Heritage Council on 15 February 2012.

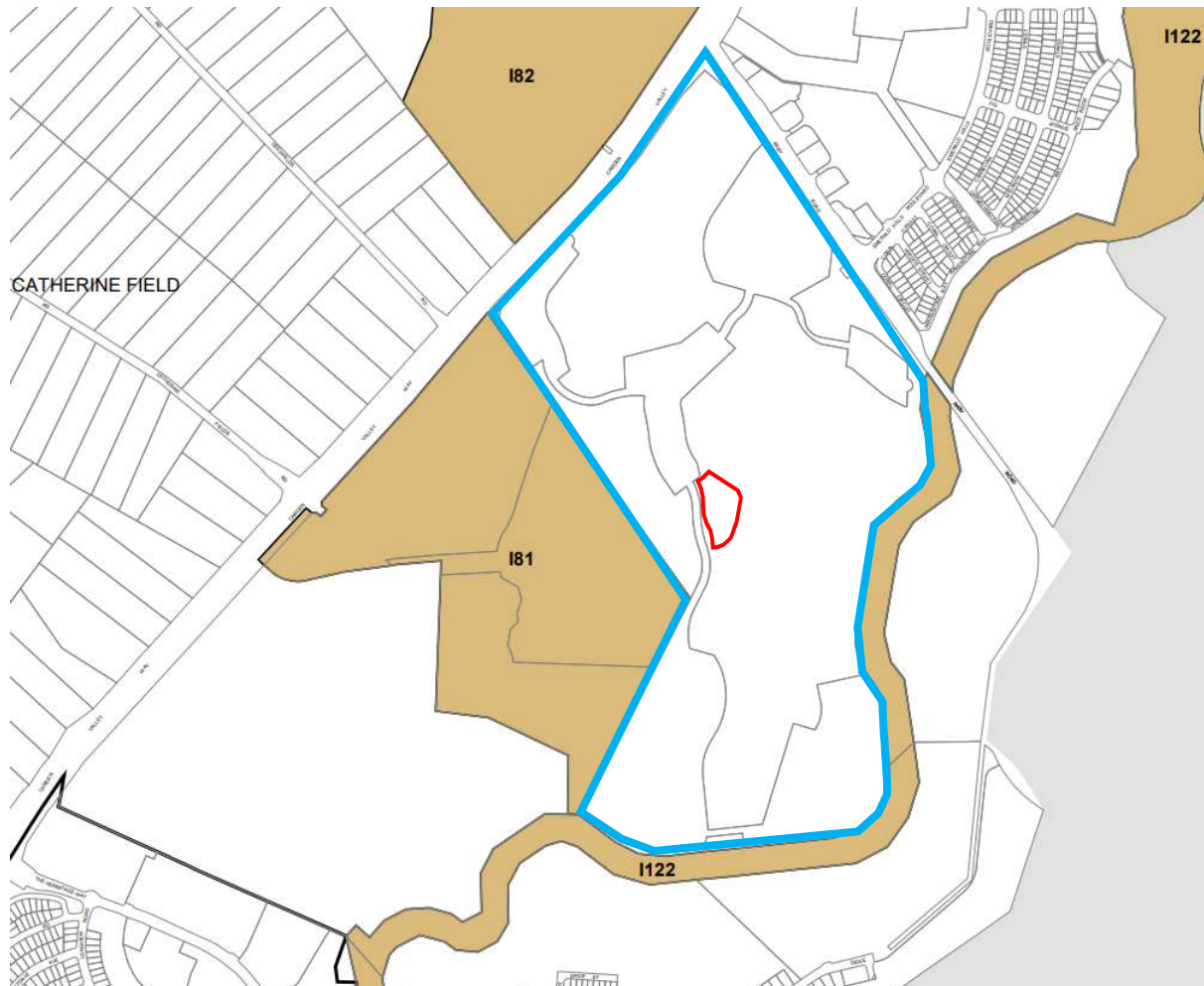


Figure 15: Heritage map extract.

The plan also notes that the homestead is characterised by the surrounding vegetation, which is a component of a cultural landscape rather than a natural one, including remnant Cumberland Plain Woodland scattered through paddocks, open grassland and planted exotic and non-indigenous vegetation concentrated around the homestead (page 17 of **Attachment G**).

The plan recommends that the key views from the homestead (refer to Figure 16 overleaf) should be conserved, maintained and enhanced (page 120 of **Attachment G**). It is noted that one of the key views from the homestead is towards the land to which the proposed seniors development is located. Therefore, the proposed development encroaches on this view corridor and could potentially diminish the quality of the homestead's easterly view by developing the open grassland landscape.

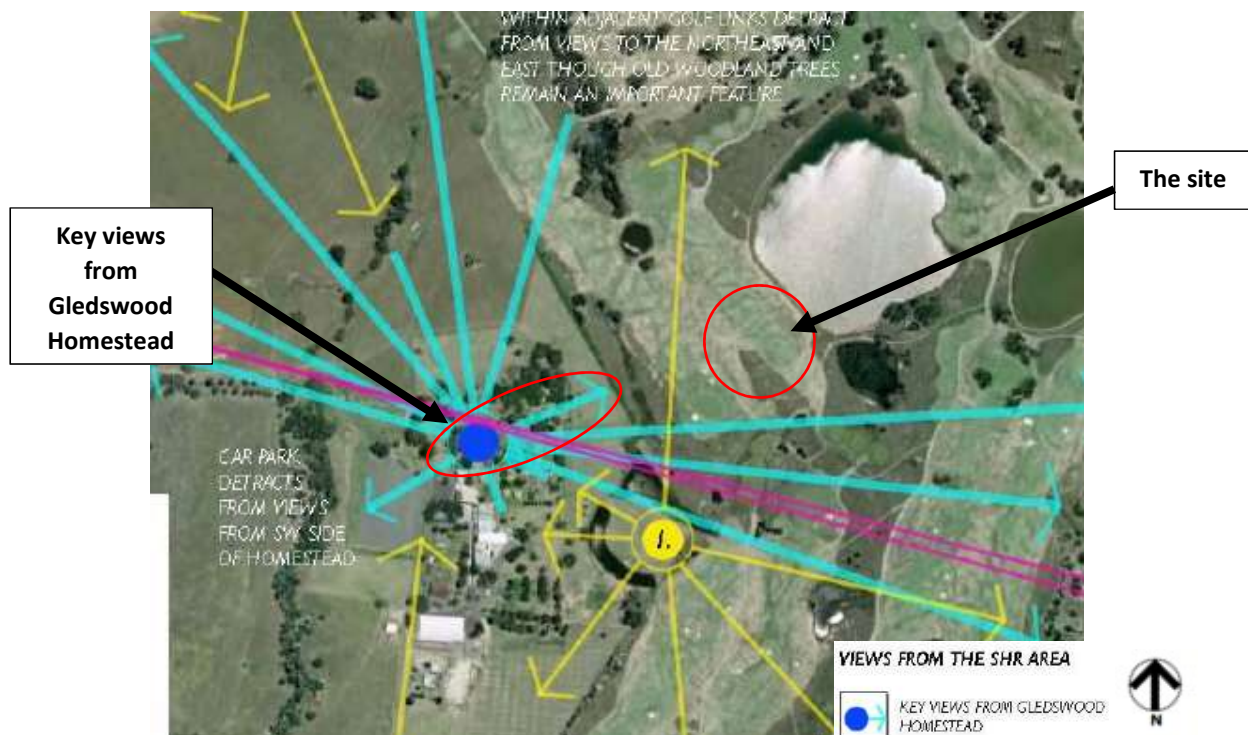


Figure 16: Key views from Gledswood Homestead.

Council has advised that the Camden Lakeside Development was planned and situated to maintain the landscape's visual importance and protect identified view corridors. This arrangement was guided by Council's consideration of the management plan, which aims to guide the conservation and management of the heritage item and surrounding landscape.

The Landscape and Visual Assessment Report (**Attachment B4**) assesses the visual impacts of the proposed seniors development within the existing landscape and visual context from six viewpoints including from the homestead. The report concludes that the visual impacts of the proposed seniors housing development are generally low or negligible however the view from the homestead is classified as being of moderate visual impact (refer to Figure 17 overleaf).

The report recommends the following mitigation measures to help reduce the visual impact of the proposed development from homestead:

- use finishes and materials that complement the locality and landscape;
- minimise reflective surfaces and use muted or less intrusive colours, particularly on the northern and western facades;
- prepare models for the proposed lighting of the proposed development in operation and ensure all light spill is contained within the boundary; and
- use trees and other screening vegetation to reduce the visual prominence of the proposed buildings, particularly along the northern and southern façades (refer to Figure 18 overleaf).

The Department concludes that although mitigation measures have been proposed, the proposed seniors development would still have a negative impact on the key views from the homestead which is inconsistent with the recommendations of the Gledswood

Conservation Management Plan. Therefore it is considered the proposal will impact on existing uses within the vicinity of the land.



Figure 17: View of the proposed seniors development from Gledswood Homestead.



Figure 18: View from Gledswood Homestead with mitigation measures.

6. 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 (clause 25(5)(b)(vi))

The *Native Vegetation Act 2003* has been repealed and does not apply to this site.

7. The impacts identified in any cumulative impact study provided in connection with the application for the certificate (clause 25(5)(b)(vii))

As there are no issued SCCs or undetermined applications for an SCC within a 1km radius of the site, a cumulative impact study is not required to address the impacts of multiple SCCs within the vicinity.

CONCLUSION

The Department concludes that the site is not suitable for seniors housing and recommends an SCC not be issued for the site because:

- there is a reliance on the provision of an internal road by the adjacent Camden Lakeside Development for access to the proposed seniors housing development. Council has not received a development application for the construction of the internal road or the residential precinct directly adjacent to the SCC proposal;
- the proposal does not comply with the access requirements of the Seniors Housing SEPP as follows:
 - the site is approximately 794m from the nearest bus stop, which is more than the required 400m distance from public transport services; and
 - the site does not have a road or an accessible pathway from the site to either Raby Road or Camden Valley Way;
- access to utility services such as water, sewerage and electricity is based on the extension of these connections from the surrounding areas once they are developed for residential purposes. However, the timing of these services is unknown; and
- there are impacts on the current land uses at the adjacent state heritage-listed Gledswood Homestead, which are inconsistent with the Gledswood Conservation Management Plan (September 2011).

ATTACHMENTS

Attachment B1–B6 – SCC application package

Attachment C1–C2 – Camden Council comments

Attachment D1–D2 – Draft determination letters

Attachment E – Applicant's response to Council comments

Attachment F – Adjacent landowner comments

Attachment G – Gledswood Conservation Management Plan

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