

CONCORD RSL SITE COMPATABILITY CERTIFICATE

**1 NULLAWARRA DRIVE,
CONCORD**

4 JUNE 2018
SA7245
FINAL
PREPARED FOR CONCORD RSL

URBIS

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Project Code	SA7245
Report Number	SA7245 – SCC1 updated

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1. INTRODUCTION

This report constitutes an application to the NSW Department of Planning and Environment (DPE) for a Site Compatibility Certificate (SCC) under clause 24 of *State Environmental Planning Policy (Housing For Seniors and People with a Disability) 2004* (the Seniors SEPP).

A SCC is required to be issued prior to the lodgement of a DA with a local Council for seniors housing as:

- The site is presently being used for the purposes of an existing registered club.
- The site “adjoins” land zoned primarily for “urban purposes”, being land zoned R2 Low Density Residential, because the Site would directly adjoin that R2 land but for the presence of a public road, being part of Nirranda Street and there is direct vehicular and pedestrian access from the R2 land to Nirranda Street. Legal advice has been obtained from Addisons confirming this (separately submitted). Canada Bay Council have also advised in meetings that they are of the opinion that the adjoining land is land zoned primarily for urban purposes.
- The proposed seniors development is not permissible under the relevant environmental planning instrument (*Canada Bay Local Environmental Plan 2013*)

The application relates to the site of the Concord RSL Club (the Club), located at 1 Nullawarra Road, Concord West which is legally described as Lot 5 in DP217073 (the subject site).

The subject site is zoned RE2 Private Recreation under the *Canada Bay Local Environmental Plan 2013* (the LEP) and prohibits seniors housing. Therefore, this SCC application has been made to demonstrate the site is suitable for seniors housing and upon which development consent can subsequently be sought.

The site compatibility criteria that are required to be assessed are addressed in **Section 6** of this report, and relate to:

- The environment.
- Impact on the likely future uses of the land.
- Availability of services and infrastructure.
- Impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing, approved or future uses of the land in the vicinity of the development.
- Clearing of native vegetation and the impact the proposed development is likely to have on the conservation and management of native vegetation.

In summary, this application seeks certification for 110 *serviced self-care housing* units where meals, cleaning services, personal care and nursing care are available on site. The proposal will incorporate the following indicative concept components:

- A 2 storey club building plus 2 levels of residential uses above Building A.
- An 8 storey residential built form element (Building B).
- A 5 storey residential built form element (Building C).
- 1.5 levels parking below the ground,

The SCC does not give development consent for the seniors living development, but rather provides a contextual assessment and certification that the future development of the site in the manner shown within this application is appropriate for the site and compatible with the surrounding context. Following the issue of the SCC, a DA will be lodged with Canada Bay Council seeking consent for the construction of detailed building forms within the parameters assessed and approved by the SCC.

Canada Bay Council has been consulted via a series of meetings. Meetings were held with Councils planners on 25 October 2016, 9 November 2016 and 23 February 2018. A councillor briefing was held on 22 November 2016 at the direction of the planning staff.

Council have verbally expressed support for the proposal in these meetings. Council planning staff and the former Director of Planning also advised in these meetings that in their opinion the Site “adjoins” land zoned primarily for urban purposes.

This report is accompanied by a range of plans and reports prepared by specialist consultants to provide a comprehensive analysis of the site, which is summarised in the Table 1.

Table 1 – Consultant Team

Input	Consultant	Appendix
Survey Plan	Linker Surveying	A
Urban Design Study and Built Form Layout	GM Urban Design and Architecture	B
Geotechnical Report	JK Geotechnics	C
Contamination Report	Environmental Investigation Services	D
Social Infrastructure Assessment	Urbis	E
Traffic Impact Assessment	The Transport Planning Partnership	F
Flood Assessment	GRC Hydro	G
Stormwater Management Plan	Sparks and Partners	H

2. SITE DESCRIPTION AND CONTEXT

2.1. SITE DESCRIPTION

The site is located at 1 Nullawarra Road, Concord West and is legally described as Lot 5 in DP217073 and is known as Concord RSL and Community Club.

The development within the site comprises a club house with sporting and health facilities, food and beverage, function and meeting rooms and two bowling greens. The site has a primary frontage to Nirranda Street and is surrounded by open space, sporting facilities and low density residential development.

To the north-east and east the Club is the Ron Routley Oval used as a cricket or soccer field, and Majors Bay Reserve comprising two hockey fields, a reserve, dog off-leash area and children's playground. To the immediate west is Arthur Walker Reserve which contains a cricket oval. The Concord Golf Club is located further to the south of the site.

Low density residential development is located further west and south-west of the subject site, on the opposite side of Nullawarra Road.

Concord West train station is located approximately 1.2km south-west of the site and Rhodes Shopping Centre is located approximately 1.6km north-west of the site.

Figure 1 – The site



Source: Six maps

2.2. DEMOGRAPHIC PROFILE

To understand the social context that the proposed development will operate in, a community profile has been developed for the study area (2km radius from the site) based on 2016 Australian Bureau of Statistics (ABS) Census data. For comparison purposes, the study area has been compared to the Canada Bay LGA and Greater Sydney. The full demographic profile is provided as par

In 2016, the study area had a population of 41,926 persons, representing 47% of the Canada Bay LGA population. Key demographic trends for the study area include:

- Young adults are the highest population group in the study area, with 34.0% of the Canada Bay LGA and 35.7% of the study area aged between 20 and 39.
- Canada Bay LGA has higher rates of those aged 65 years and older, representing 14.7% of the population, compared with 13.0% for the study area and 13.9% for Greater Sydney.
- The study area and LGA have higher rates of cultural diversity when compared with Greater Sydney. Overseas born residents represent 46.3% of the study area and 46.7% of Canada Bay LGA compared with 42.9% for Greater Sydney. Approximately half (51.8%) of the study area speak English only, which is lower than the LGA (53.4%) and Greater Sydney (58.4%).
- Chinese born residents represent 12.2% of the study area which is higher than Canada Bay LGA (9.8%) and Greater Sydney (4.7%).
- Family households are the dominant household structure in the study area (76.0%) which is higher than Canada Bay LGA (71.6%) and Greater Sydney (73.6%).
- The current family structure in the study area is predominately couple families with no children (38.9%), followed by families with children (31.3%). Comparatively, the family structure for Canada Bay LGA is predominately couple families with children (45.5%), followed by couple families with no children (39.85%).
- Approximately half of the dwellings in the study area are flat, units or apartments (49.3%), followed by separate houses (41.3%). This is similar for Canada Bay LGA, however comparatively only 28.1% of dwellings in Greater Sydney are flat, units or apartments.
- The study area has similar rates (5.3%) of unemployment when compared with Canada Bay LGA (5.0%) and Greater Sydney (5.7%). Approximately a third (33.0%) of the study area are professionals, followed by managers (17.5%), which is similar for Canada Bay LGA.
- Over one third (37.9%) of the study area have a bachelor degree or higher, which is similar for Canada Bay LGA (38.0%) and higher than Greater Sydney (24.1%).

3. INDICATIVE CONCEPT

The Concord RSL Club seeks to develop the site as a 110 *serviced self-care housing* where meals, cleaning services, personal care and nursing care are available on site. This will be complemented by a new registered club and gym facilities.

Figure 2 – Proposed Concept Layout Plan



Source: GM Urban Design and Architecture

The indicative concept upon which this SCC application is based (which is the subject of further design development as part of the subsequent DA process) comprises the following elements:

- A 2 storey club building plus 2 levels of residential uses above Building A.
- An 8 storey residential built form element (Building B).
- A 5 storey residential built form element (Building C).
- 1.5 levels parking below the ground,

4. STRATEGIC PLANNING CONTEXT

The following provides a summary of the key and relevant strategic planning documents.

4.1. EASTERN CITY DISTRICT PLAN

The District Plans divide Greater Sydney into five districts which represent their common locality and future planning opportunities. The district plans relate to longer term metropolitan planning for Greater Sydney. The site is located within the Eastern City District, covering Bayside, Burwood, City of Sydney, Canada Bay, Inner West, Randwick, Strathfield, Waverley and Woollahra local government areas.

The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social, and environmental matters and supports the 40-year vision for Greater Sydney. It is a guide for implementing the Sydney Regional Plan at a district level and is a bridge between regional and local planning.

The District Plan contains four key themes that represent the planning priorities for the district, with ten directions to guide delivery. The four key themes are:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

The priorities relevant to the proposed seniors housing development relate to the plans *liveability* themes which outlines the following in relation to seniors living:

District is expected to see a 102% proportional increase in people aged 85 and over and a 64% increase in the 65-84 age group by 2036.

16% of the District's population will be aged 65 years or over in 2036, up from 12% in 2016.

Housing targets for City of Canada Bay between 2016 and 2021 are 2,150 dwellings to include all types of housing including seniors housing.

More compact housing types and medium-density housing, as well as the design of walkable neighbourhoods to create opportunities for people to continue living in their community.

4.2. CITY OF CANADA BAY FUTURES PLAN 20 (COMMUNITY STRATEGIC PLAN)

This Plan enables residents to respond in a positive way to the challenges the community faces. The vision was initially developed in 2008 and involved consultation with the community and stakeholder meetings. In 2012 legislation required a further review of *FuturesPlan20*. A number of structural and content changes were made to the plan to ensure clarity of the goals and directions provided under each key theme. The final *FuturesPlan20* was adopted by Council in June 2013.

The key themes are intended to express the “desired look and feel of the city in twenty years’ time”. The four key themes are:

- Active and vibrant
- Sustainable spaces and places
- Innovative and engaged
- Thriving and connected

The *Thriving and Connected* theme is relevant to the proposal as it outlines the direction to “*encourage and support the provision of a diverse range of housing stock which responds to changing needs*”. Additionally, the plan recognises a number of challenges that the community faces including the need to maintain and renew ageing infrastructure.

4.3. CITY OF CANADA BAY POSITIVE AGEING STRATEGY 2010

The City of Canada Bay Positive Ageing Strategy 2010 is a plan to “*reflect the diversity amongst older people and recognise that although each of us is ageing, we will all experience this process in different ways*”. The plan addresses arising health issues for the ageing population and outlines Council's role and actions to address present challenges. The plan also creates a linkage to the *FuturePlan20* by providing a range of actions to address the directions in the *FuturesPlan20*.

Of most relevance to this report is *Section 24 Appropriate Housing* which outlines a number of challenges and key issues relevant to seniors living in Canada Bay as well as the wider ageing community, as sources from The Australian Local Government Association (ALGA). The plan outlines the following key challenges:

- The only age group moving out of the City of Canada Bay in more numbers than they are moving in is the older aged groups, particular those over 65 years. Majority are moving to close-by suburbs of Ryde and Burwood due to the lack of affordable and appropriate housing for older people in the Canada Bay LGA.
- Most people do not want to live in residential care – typically associated with ‘old people’s homes’, ‘care homes’ or ‘nursing homes’.
- Reports suggest that people are likely to be attached to their local area, but not necessarily to their home and most rejected the idea of living with extended family.
- Canada Bay is a desirable area and so rents and houses are unaffordable
- Barrier for older people is the need to find housing that is close to public transport, shops and other essential services.
- A belief amongst the community that Council is losing a lot of opportunities to build retirement villages, and that they should work in partnerships with Churches and other organisations that may have land available.
- Council identified a number of options to improve the supply and development of senior's accommodation, some of which are listed below:
 - Investigate the possibility of villa development; and
 - Investigate the extension of Affordable Housing Policy to encompass low cost seniors' accommodation.

5. STATUTORY FRAMEWORK

5.1. STATE ENVIRONMENTAL PLANNING POLICY (HOUSING SENIORS AND PEOPLE WITH A DISABILITY) 2004

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (the Seniors SEPP) permits development on certain land for housing for seniors and people with disabilities.

In our opinion, for the reasons which we set out below, the Seniors SEPP applies to the Site because the Site “adjoins” land zoned primarily for urban purposes and the Site is being used for the purposes of an existing registered club.

Clause 4 of the Seniors SEPP applies in NSW relevantly to land that is being **used for the purposes of an existing registered club** (clause 4(1)(b) of the Seniors SEPP) and **land that adjoins land zoned primarily for urban purposes**. For the purposes of this Seniors SEPP, land that adjoins land that is zoned primarily for urban purposes includes (but is not limited to) land that would directly adjoin land that is zoned primarily for urban purposes **but for the presence of a public road to which there is direct vehicular and pedestrian access from the adjoining land** (clause 4(4) of the Seniors SEPP).

The Site is zoned RE2 Private Recreation under *Canada Bay Local Environmental Plan 2013* (LEP). The site is surrounded by land zoned RE1 Public Recreation and land zoned R2 Low Density Residential. The Site is separated from the R2 land by a small triangular parcel of land (Triangular Parcel), which is zoned RE1 Public Recreation.

It is clear from the Deposited Plan for the Site, being DP 217073, and from survey information provided by Linker Surveying dated 14 December 2017 (submitted as part of the legal advice), that the Triangular Parcel is part of Nirranda Street, being a public road.

Legal advice provided by Addisons (submitted separately) states:

- The Site is being used for the purposes of an existing registered club. Therefore, the relevant test is whether the Site “adjoins” land zoned primarily for urban purposes.
- The NSW Land and Environment Court⁷ and the NSW Court of Appeal have both “*adopted a loose sense of the word [adjoins] rather than its exact meaning*”, emphasising that its meaning depends upon its context.⁹ “Adjoins” means “*near to*”, “*in the neighbourhood of*” or “*in sufficient proximity to*” land zoned primarily for urban purposes. The Site does not need to be “*conterminous with (that is, having a common boundary with) or be immediately adjoining ... Residential land*”.
- Where, as is the case here, there is a public road which separates the Site from adjoining land zoned for urban purposes, clause 4(4) of the SEPP provides that the subject land adjoins land zoned primarily for urban purposes **if the subject land would “directly adjoin land that is zoned primarily for urban purposes but for the presence of a public road to which there is direct vehicular and pedestrian access from the adjoining land”**.
- Having regard to the Court’s interpretation of the word “adjoins” and clause 4(4) of the SEPP, and the factual matters set out above, in Addisons opinion, the Site would directly adjoin land zoned primarily for urban purposes being the R2 Low Density Residential land *but for* the presence of a public road, being part of Nirranda Street.

Clause 17 of the Seniors SEPP allows serviced self-care housing to be carried out with consent on land that adjoins land zoned primarily for urban purposes. The serviced self-care housing must also be provided:

- (a) for people with a disability, **or**
- (b) in combination with a residential care facility, **or**
- (c) as a retirement village (within the meaning of the *Retirement Villages Act 1999*).

The application seeks consent for 110 *serviced self-care housing* as seniors housing that consists of self-contained dwellings but also where meals, cleaning services, personal care and nursing care are available on site. Serviced self-care housing is defined under the Seniors SEPP as:

“serviced self-care housing is seniors housing that consists of self-contained dwellings where the following services are available on the site: meals, cleaning services, personal care, nursing care”.

The seniors housing will operate as a retirement village (within the meaning of the *Retirement Villages Act* 1999).

Clause 23 of the Seniors SEPP includes special provisions for the development of seniors housing on land used for an existing registered club. This clause requires that the club use is distinctly separate from the senior’s development, and that appropriate protocols are in place to manage misuse and abuse of gambling by senior’s residents. As identified on the indicative concept plan, the seniors housing subject to the SCC application is separated from the Club. The detailed DAs to follow will be required to address detailed design matter and appropriate protocols to minimise harm associated with gambling.

Clause 24 requires that a site compatibility certificate (SCC) be obtained from the DPE for seniors housing on land that is used for the purposes of an existing registered club where the proposed development is not permissible under the relevant environmental planning instrument. As such, a SCC is required for the proposed development.

Clause 25(5)(b) lists criteria be addressed in an application for a SCC. These criteria are addressed, in respect to the proposed development, in **Section 6** of this report.

The contextual assessment and satisfaction of the various criteria under Clauses 24 and 25 of the Seniors SEPP within this SCC application provides the basis for a positive assessment of the proposed development that will be articulated in further detail in the relevant DA documentation required to be submitted to Canada Bay Council following SCC approval.

Clause 42 of the Seniors SEPP requires the consent authority to be satisfied that residents of such housing have reasonable access to services. Clause 42 also provides that if services are limited to those provided under Government provided or funded community based care packages, this does not constitute reasonable access to services.

The Clubs intend to provide *served self-care housing* where meals, cleaning services, personal care and nursing care, bus service for at least 10 passengers are available on site.

5.2. STATE ENVIRONMENTAL PLANNING POLICY NO 65—DESIGN QUALITY OF RESIDENTIAL APARTMENT DEVELOPMENT

State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development (SEPP 65) aims to improve the design quality of residential flat development in New South Wales, having regard to its economic, environmental, cultural and social benefits, including sustainability, the public domain, amenity and the changing needs of the population.

SEPP 65 applies to the residential accommodation component of seniors housing. Further detailed assessment of the proposal against SEPP 65 and the ADG will be undertaken at DA stage.

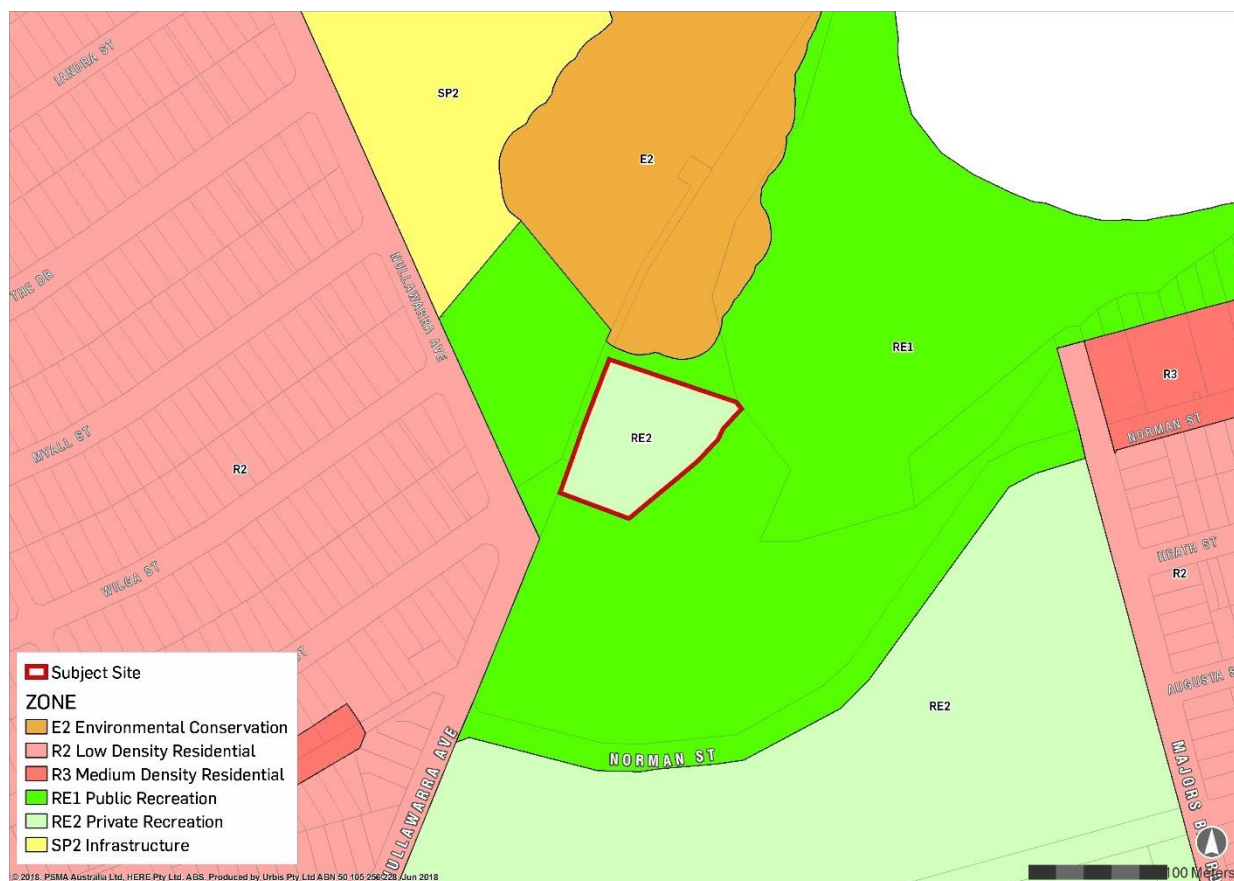
5.3. CANADA BAY LOCAL ENVIRONMENTAL PLAN 2013

Canada Bay Local Environmental Plan 2013 (the LEP), prepared in accordance with the State Government’s Standard Instrument template, came into effect in July 2013. The following assesses the proposal against relevant provision of the LEP.

5.3.1. Zoning

The site is zoned RE2 Private Recreation under the LEP as shown in **Figure 3**. Seniors housing is not identified as a permissible use in the RE2 zone, and is as such prohibited on the site unless a SCC is granted.

Figure 3 – Canada Bay LEP 2013 Zoning



The objectives of the RE2 Private Recreation zone are:

- To enable land to be used for private open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.
- To conserve private open space that enhances the scenic and environmental quality of Canada Bay.

The proposal is consistent with the RE2 Private Recreation zone objectives for the following reasons:

- The indicative concept plan will complement the existing recreation land uses in the locality which are adjacent to the site in a manner which is consistent with what is presently occurring on the site.
- The provision of accessible private open space at ground level and a range of ancillary community uses on site provides a variety of settings in which recreational activities can occur.
- The provision of a through site link will allow for a clearer connection between Nullawarra Avenue and the Parramatta River.
- The proposal will improve the scenic qualities of Canada Bay by providing an updated and modern club facility in conjunction with the seniors facility;

5.3.2. Building Height and Floor Space Ratio

There is no maximum building height or floor space ratio applicable to the subject site.

6. SITE COMPATIBILITY CRITERIA

Clause 25(5)(b) of the Seniors SEPP contains the 'heads of consideration' to be addressed in a SCC application. These are listed below:

25(5) The Director-General must not issue a site compatibility certificate unless the Director-General:

(b) is of the opinion that the proposed development is compatible with the surrounding land uses having regard to (at least) the following criteria:

(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,

(ii) the impact that the proposed development is likely to have on the uses that, in the opinion of the Director-General, are likely to be the future uses of that land,

(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 any proposed financial arrangements for infrastructure provision,

(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,

(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,

(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.

Each of these heads of consideration is addressed below, in respect to the proposed development.

6.1. THE NATURAL ENVIRONMENT

6.1.1. Natural Hazards

6.1.1.1. Geotechnical

JK Geotechnics have assessed the site for geotechnical issues that may result from the proposal and have provided design and civil engineering recommendations in response. The Due Diligence Geotechnical Investigation report, attached at **Appendix C** demonstrates the proposal can be designed and constructed to respond to the geotechnical constraints of the site.

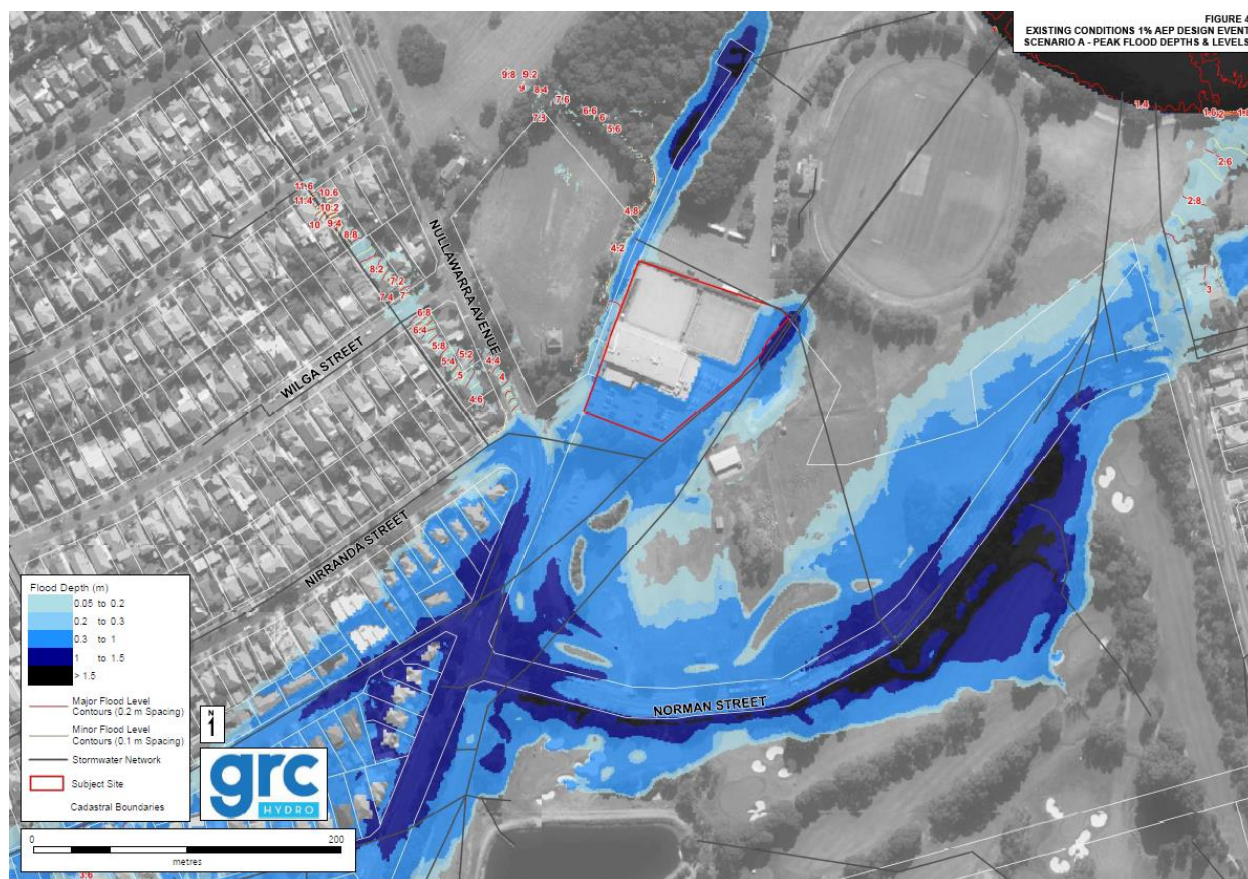
6.1.1.2. Flooding

GRC Hydro have modelled the existing one in 100 year flood levels for the site (refer to **Figure 4**). The 100 year flood waters are generally contained within the existing car park of the site in the eastern and southern portion of the site. **Figure 4** below shows the flood levels. The image demonstrates that the site can be developed for the purposes proposed subject to appropriate floor levels being adopted.

The Flood Assessment included at **Appendix G** finds:

Based on the above analysis then and the FDM criteria articulated herein, it is clear that the proposed development can be achieved with flood risks kept at acceptable levels

Figure 4 – Existing 1 in 100 Year Flood Depths



Source: GRC Hydro

6.1.1.3. Stormwater

The redevelopment of the site will warrant a review of the existing stormwater management of the site. Sparks and Partners have been engaged by the Concord RSL to prepare a concept stormwater management plan for the site to ensure that any proposal could be capable of being managed on the site in accordance with the requirements of Canada Bay Council.

The Stormwater Management Report at **Appendix H** concludes:

The conditions outlined above indicate that there are no factors to restrict the proposed development from complying with Canada Bay Council's stormwater requirements. Further investigation into the site constraints will be required at the detailed design stage in order for the proposed development to be assessed by council.

Based on these findings it is considered that the proposal is capable of complying the requirements of Canada Bay Council subject to detailed design undertaken at the DA stage.

6.1.2. Existing and Approved Uses Surrounding the Site

- The surrounding locality is characterised by low density residential uses to the south and with recreational facilities to the north and east.
- The proposed seniors housing is compatible with the character of the area and at the interface with the low-density residential area to the east. The proposal has is capable by virtue of siting and the existing tree canopy to be screened from the residential land uses adjacent to the site.
- The use of the site for the purpose of a seniors living and a registered club and the preferred masterplan which has been adopted as part of this application is considered to maintain or enhance the amenity of the adjacent recreational facilities due to the following design considerations:
 - Building separation to enhance the view corridor from the main entrance along Nirranda Street to the oval.

- A high level landscape/deep soil area to the boundaries of the subject site to enhance the landscape character of the site and integrate it better with the surrounding context.
- Variety of separate communal open spaces between buildings for club patrons and residents.
- A northern aspect communal open space to achieve the required solar access.
- Publicly accessible pedestrian pathways across the site to enhance the connectivity between Nirranda Street, the oval and the existing walking pathway to the north along the water
- There are no known relevant approvals within the immediate vicinity of the site that would be compromised by the proposed development.

6.2. IMPACT ON THE LIKELY FUTURE USES OF THE LAND

6.2.1. A Metropolis of Three Cities

- A Metropolis of Three Cities does not identify any specific uses on the subject site or the land immediately surrounding.
- The proposal is consistent with the goal of the plan to increase housing choice and allows the local aging population who choose to downsize their homes to remain within the Canada Bay area.

6.2.2. Eastern City District Plan

- The Eastern City District Plan does not identify any specific uses on the subject site or the land immediately surrounding.
- The proposal is consistent with the priority to 'accelerate housing supply, choice and affordability and build great places to live' through the provision of new seniors housing

6.2.3. Canada Bay Local Environmental Plan 2013

- A range of suitable land uses are permissible within the RE2 Private Recreation zone.
- As stated in **Section 5.3** of this report, the proposal is consistent with the RE2 Private Recreation zone objectives for the following reasons:
 - The indicative concept plan will complement the existing recreation land uses in the locality which are adjacent to the site in a manner which is consistent with what is presently occurring on the site.
 - The provision of accessible private open space at ground level and a range of ancillary community uses on site provides a variety of settings in which recreational activities can occur.
 - The provision of a through site link will allow for a clearer connection between Nullawarra Avenue and the Parramatta River.
 - The proposal will improve the scenic qualities of Canada Bay by providing an updated and modern club facility in conjunction with the seniors facility;
- It is considered that the proposed use of the site for *serviced self-care housing* will have minimal significant impacts on the future use of the site or of surrounding sites.

6.2.4. Continued Use as a Club Site

- The diversification of uses (including the provision of seniors housing) on the site is necessary to allow for the continued financial viability of the existing registered club.

- The club is committed to continuing to provide community facilities to its members and the wider community.
- The proposed seniors living component of the development, and the distinctly separate function of both the club use and the seniors housing will not result in any significant impact on the future use of the site for registered club and community uses.

6.3. THE AVAILABILITY OF SERVICES AND INFRASTRUCTURE (PARTICULARLY TRANSPORT, MEDICAL, RETAIL AND COMMUNITY)

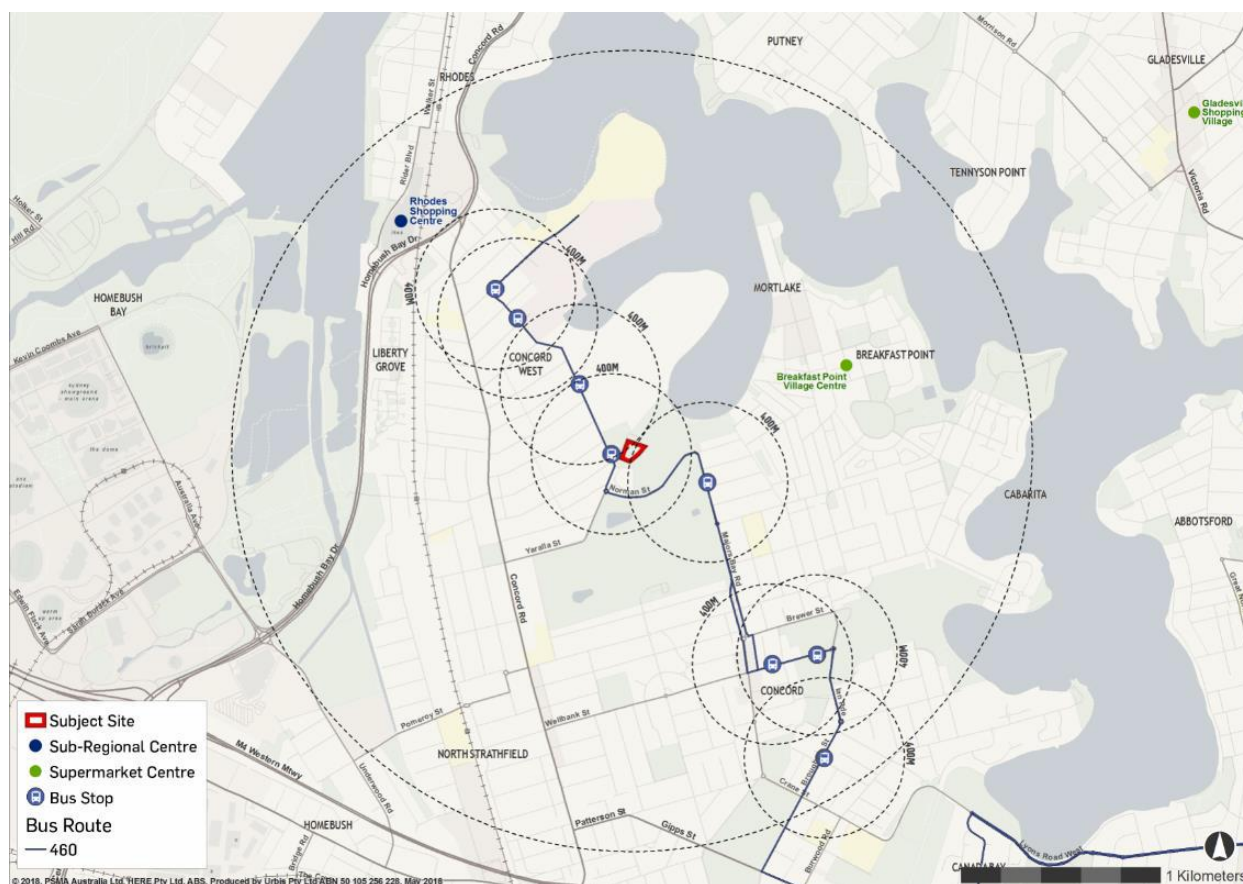
The Social Infrastructure Assessment attached at **Appendix E** identifies the existing social infrastructure within the vicinity of the subject site and considers the extent to which existing provision in the surrounding catchment can cater for any additional demand, and how any on site provision may cater to future demand.

The following discussion captures the findings of the Social Infrastructure Assessment report.

6.3.1. Public Transport

- The site is located within 50 metres of a bus stop on Nullawarra Road which provides access to the 460 bus route. The bus route connects the site to services located on Majors Bay Road, such as Coles, restaurants, bank services and a post office.
- **Figure 5** and **Table 2** show the bus routes for the 460 bus route. The bus route provides southbound access to services located along Majors Bay road via Nullawarra Avenue. The first southbound service from the site arrives at 10:09am and the last departs at 3:09pm. The first northbound service from the bus stop adjacent to the site arrives at 9:54am and the last at 2:54pm.
- The 460 bus service takes approximately 8 minutes from the site to the bus stop located on Wellbank St, opposite Bent Street providing access to the Coles on Majors Bay Road. A wheelchair accessible bus with low-level floors and space for wheelchairs is available hourly.

Figure 5 – Bus Route



Source: Transport NSW

The table below provides the Monday to Friday bus schedule.

Table 2 – Bus Routes Servicing the Surrounding Area

Operator	Route	Schedule (Mon-Fri)	Timing
Transport NSW	460 Concord Hospital to First Ave, Five Dock	AM: 10:09, 11:09 PM: 12:09, 1:09, 2:09, 3:09	Arriving to Wellbank Street, opposite Bent Street, approximately 8 minutes after departure from site.
Transport NSW	460 First Ave, Five Dock to Concord Hospital	AM: 9:54, 10:54, 11:54 PM: 12:54, 1:54, 2:54	Arriving at the site approximately 6 minutes after departure.

The bus routes above provide accessibility to the range of services detailed **Section 6.3.4** - □ proceeding.

6.3.2. Private Bus Services

A bus service for at least 10 passengers will be available on site.

6.3.3. Roads

TTPP have undertaken a Traffic Impact Assessment of the proposed seniors living development. The senior living component is estimated to generate up to 107 vehicle trips per hour during AM and PM peak periods. Traffic have completed a SIDRA analysis of estimated trips of the proposed development with existing intersection performance and finds:

The proposed development of the redeveloped club, the 110 seniors housing apartments (serviced self-care housing) and the increase in the gym floor area is not expected to result in any adverse parking and/or traffic implications on the surrounding road network. As such, the proposed development is considered broadly compatible with the surrounding road network.

Refer to the Traffic Impact Assessment at **Appendix F**.

6.3.4. Medical Practitioners and Hospitals

There are no general medical practitioners or hospitals located within a 400 metre radius of the site.

- There are a range of medical services located in the Majors Bay Road precinct accessible via the 460 route, as well as the Rhodes Shopping Centre.
- The two large medical centres located within 400m of a bus stop on Majors Bay Road, and Wellbank Street as detailed below:
 - Wellbank Street Medical Practice is located at 28 Wellbank Street and is open Monday to Saturday. Five doctors are available to patients, as well as on-site pathology, three psychologists and nurses. The medical centre also provides after hours care and both doctor and nursing home visits.
 - Concord Medical Centre is located at 1-2/114 Majors Bay Road and is open seven days a week. There are five doctors available as well as a Chiropractor, Diabetes Clinic, Dietitian, Kids Clinic, Podiatrists, psychologist and travel vaccine clinic.
- Concord Hospital, located on Hospital Road, Concord, is located approximately 1km from the site and available via the 460 bus route

Figure 6 shows the locations of surrounding medical facilities. Refer to the Social Infrastructure Assessment attached at **Appendix E** for a larger image.

Figure 6 – Medical Facilities



Source: Urbis GIS

6.3.5. Shopping Centres and Supermarkets

- There are no shopping centres or supermarkets located within a 400 metre radius of the site.
- Coles Supermarket is located on Majors Bay Road which can be accessed using the 460 bus route
- Rhodes Shopping Centre also provides a range of food and convenience stores, with anchor tenants including Ikea, Coles, Bing Lee, Target and Reading Cinemas.
- **Figure 7** shows the retail opportunities that surround the site. Refer to the Social Infrastructure Assessment attached at **Appendix E** for a larger image.

Figure 7 – Retail



Source: Urbis GIS

6.3.6. Community Centres and Senior Citizens Clubs

- There are no senior citizens clubs within 400m of the subject site.
- Concord RSL provides a range of community related activities including entertainment and community events.
- There are number of community halls available for hire for community functions, occasions, training sessions or corporate events within Canada Bay LGA.
- The Concord Senior Citizens Centre is located on the corner of Wellbank Street and Bent Street and has an auditorium and meeting room available for private and corporate functions. The Concord Memorial Hall is located on the corner of Davidson Avenue and Majors Bay Road and provides capacity for up to 30 people in the main hall. Both community centres are accessible via the 460 bus route.

6.3.7. Parks and Recreational Facilities

- Residents of the proposed senior's development will have access to a range of open space and recreation facilities located adjacent to the site and in the surrounding area. The proposed development includes a public pedestrian through link which will allow access to Majors Bay Reserve to the east and Arthur Walker Reserve to the west. Concord Golf Club is also located to the south of the proposed development.
- Whilst the proposed development is located adjacent to two large open space areas, there are also other opportunities for passive and active recreation, available via the 460 bus route. This includes Edwards Park, Queen Elizabeth Park, Rhodes Park and Massey Park Golf Course.

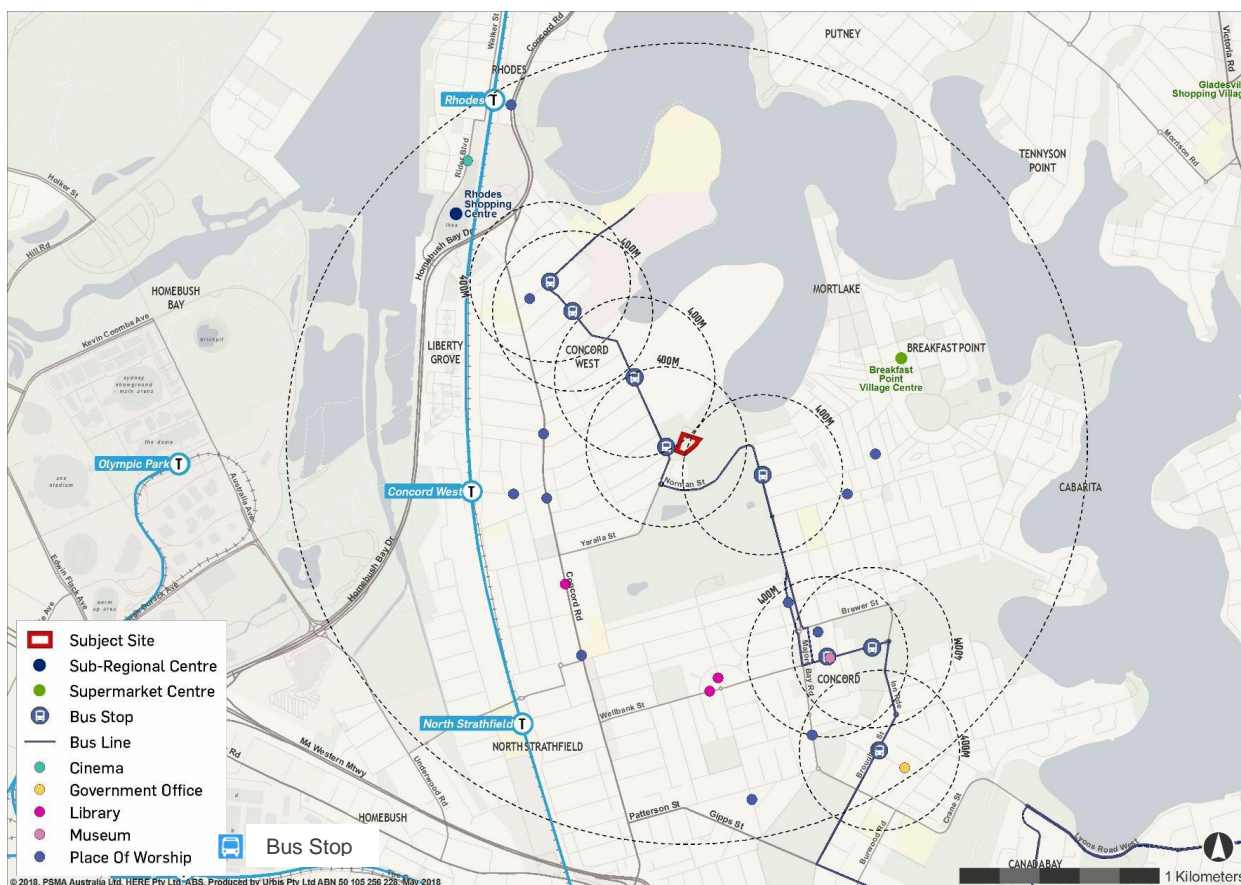
6.3.8. Libraries

- There are no libraries located within a 400 metre radius of the subject site.

- Concord Library is located on Flavelle Street, Concord. The library provides book lending services, as well as CD, DVDs and magazines. Other library services are offered for a range of interests, ages and languages. Some examples include multicultural language group meetings, home library service to hostels and nursing home and aged care facilities.

6.3.9. Banks and Post Offices

- There are no banks or post offices located within a 400 metre radius of the subject site.
- Majors Bay Road provides access to a Commonwealth Bank and St. George Bank ATM service, accessible via the 460 route. Rhodes Shopping Centre also has multiple bank services including ANZ, Commonwealth Bank, HSBC, NAB, St. George and Westpac.
- Figure 8 – Community Facilities



Source: Urbis

6.4. IMPACT ON THE PROVISION OF LAND FOR OPEN SPACE OR SPECIAL USES

The subject site is currently classified as private open space and used for the purposes of a registered club. The Seniors living proposal will ensure the long-term viability of the Concord RSL Club and will not compromise the supply of public open space in the area. The proposal creates an opportunity to improve the quality of private open space on the site and permitted recreation uses on the site (i.e. an upgraded club). All future residents will have access to the facilities and amenities provided as part of the application.

6.5. IMPACT OF BULK, SCALE, BUILT FORM AND CHARACTER

Multiple concept plans have been prepared for the site to consider the appropriate built form which can be accommodated on the site whilst considering the impact of the site itself. The preferred masterplan which has been adopted for the site has resulted from a site analysis and has responded to the opportunities and constraints of the site and immediate area in a manner that demonstrates its compatibility with the existing uses of the area.

The proposed development bulk and scale is considered appropriate due to the following factors:

- The proposed development site is a large prominent site that offers flexibility in spatial master planning. This flexibility has allowed the development of the proposed concept plan for the site that can be amended before developing a detailed final concept plan. The detailed design of the new buildings at DA stage will ensure the buildings are designed in a way that creates a positive architectural expression for the site and the broader area.
- The proposed seniors housing is compatible with the character of the area and at the interface with the low density residential area to the east. The proposal has is capable by virtue of siting and the existing tree canopy to be screened from the residential land uses adjacent to the site.
- The indicative concept plan will complement the existing recreation land uses in the locality which are adjacent to the site in a manner which is consistent with what is presently occurring on the site.
- The provision of accessible private open space at ground level and a range of ancillary community uses on site provides a variety of settings in which recreational activities can occur.
- The provision of a through site link will allow for a clearer connection between Nullawarra Avenue and the Parramatta River.
- The proposal will improve the scenic qualities of Canada Bay by providing an updated and modern club facility in conjunction with the seniors facility;
- The proposal includes significant areas of landscaped open space at ground level. This provision will 'open up' the site visually when viewed from the surrounding residential areas. Further, the provision of a central corridor running the length of the site creates a view corridor to break up the mass and bulk of the collection of buildings.
- The proposed land use is compatible with the surrounding land uses, particularly the residential neighbourhood to the east of site.
- The proposed building envelopes are sited in a manner that allows adequate privacy between these buildings and adjoining buildings. Further design detail showing the amelioration of privacy impacts and compliance with privacy controls in the ADG will be provided with the DA.

6.6. ADDITIONAL ISSUES TO CONSIDER

6.6.1. Land Contamination

Environmental Investigation Services (EIS) conducted a Stage 1 investigation of the site, which included an review of previous reports prepared for the site, a desktop review of historical information, and preparation of a conceptual site model (CSM). The purpose of the investigation was to determine if the site had areas of environmental concern and if the site could be made suitable for the development seeking certification.

Refer to the Stage 1 Environmental Site Assessment (ESA) report for a full description of the results of the site investigation. In summary, the ESA concludes:

The site can be made suitable for the proposed development subject to implementing the following recommendations:

- *Additional sampling and analysis in the vicinity of BH6 to further assess the extent of the hazardous waste both and vertically;*
- *Undertake a Stage 2 ESA. The stage 2 assessment should include groundwater sampling and analysis for the CoPC and address the data gaps identified in Section 11.34;*
- *If deemed necessary, a remediation action plan (RAP) should be prepared (following the Stage 2 investigation) to document the strategy required to reduce the potential risks associated with the site contamination to an acceptable level, and to render the*

site suitable for the proposed development and on-going use as a commercial property and

- *A hazardous building materials assessment should be completed (if not already available) for any parts of the buildings to be demolished. All buildings should be demolished appropriately and clearance certificates should be provided on completion.*

Further contamination testing and the above recommendations will be undertaken at development application (DA) stage. Subject to fulfilling the above recommendations, the site is suitable for use as Seniors Living.

7. SUMMARY AND CONCLUSION

This application for a Site Compatibility Certificate (SCC) under Clause 24 of the Seniors SEPP relates to the site of the Concord RSL Club located at 1 Nullawarra Avenue, Concord, legally described as Lot 5 DP217073.

The indicative concept upon which this SCC application is based (which is the subject of further design development as part of the subsequent DA process) comprises the following elements:

- A 2 storey club building plus 2 levels of residential uses above Building A.
- An 8 storey residential built form element (Building B).
- A 5 storey residential built form element (Building C).
- 1.5 levels parking below the ground,

The required Criteria as stipulated in the Seniors SEPP have been assessed in this report, and it has been demonstrated that the site is appropriate for the following reasons:

An analysis of the existing flora, fauna and aquatic species on site has demonstrated that adequate solutions and mitigation measures are available at DA stage to provide a satisfactory environmental outcome. Further, given the site is currently large expanses of exotic grass and the proposal includes significant landscaping and deep soil zones, the resulting development will be an improvement in terms of flora and fauna.

Initial site investigations have shown that any natural hazards affecting the site (such as geotechnical conditions, flooding and stormwater events) can be appropriately managed and the site is suitable for the proposed seniors use.

The range of existing and future services and facilities will be available to adequately sustain a seniors living development in this location for future senior residents.

The redevelopment of the club site to include a seniors housing component will not have any adverse impacts on the current or likely future uses of the site and surrounding areas.

The proposed built form, scale and character is appropriate in the context of the existing development and the level of impact is also appropriate. Further detail regarding the specific design and architectural expression of the proposed buildings is to be finalised at DA stage.

This report has demonstrated that the proposed redevelopment of the Concord RSL Club land for seniors housing, meets the relevant 'heads of consideration' under Clause 25 of the Seniors SEPP. It is therefore considered that the Minister's consent can be granted to the issue of a Site Compatibility Certificate allowing a DA to be lodged with Council.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A SURVEY PLAN

APPENDIX B URBAN DESIGN STUDY AND BUILT FORM LAYOUT

APPENDIX C GEOTECHNICAL REPORT

APPENDIX D CONTAMINATION REPORT

APPENDIX E

SOCIAL INFRASTRUCTURE ASSESSMENT

APPENDIX F

TRAFFIC IMPACT ASSESSMENT

APPENDIX G FLOOD ASSESSMENT

APPENDIX H STORMWATER MANAGEMENT PLAN



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