

Revised Planning Report in Support of Site Compatibility Certificate Application for Seniors Living

170 RESERVOIR ROAD,
ARNDELL PARK

21 FEBRUARY 2020



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EXECUTIVE SUMMARY

This Planning Report has been prepared in support of an application for a Site Compatibility Certificate for a portion of the existing Blacktown Workers Club at 170 Reservoir Road, Arndell Park.

The Blacktown Workers Club has a long successful and community based relationship with the local residents within Blacktown. To serve their members they are planning to bring a new level of retirement living to Blacktown in the form of the proposed seniors housing proposal which includes a residential aged care facility as well as a range of serviced self-care housing. The proposal is framed around a 'living' road as an active shared space, giving pedestrians priority, the buildings provide high levels of amenity and look out on framed views of landscape spaces. The site will provide all of the services necessary to support the aged residents and be transformed into a vibrant new retirement community.

The development site is located within the southern portion of the existing Blacktown Workers Club precinct. The site which is currently operated as a sporting facility and is bound by Reservoir Road to the east and Penny Place to the south, with a site area of 5.41 hectares.

The development proposed comprises:

- 480 Independent Living Units (ILUs) with a gross floor area of 59,690m² - note these are classified as serviced infill
- 160 Retirement Aged Care Facility (RACF) with a GFA of 7,670m²
- 652 car parking spaces
- Communal facilities with a GFA of 3,220m²
- Common open space 14,475m².

The strategic planning framework clearly calls for the provision of new and diverse housing opportunities in existing urban areas that enjoy good accessibility to public transport, community and retail facilities. The analysis undertaken as part of this report reveals that the subject lands possess these qualities. It also reveals that urban conversion of the subject land could be readily absorbed into the existing urban environment as it would represent a simple and small extension of the existing urban footprint.

An assessment against key statutory and strategic considerations has also been undertaken as part of the report and reveals that the development concept satisfies the relevant Site Compatibility Certificate criteria along with the various State and Local Government strategic documents and will deliver additional housing for seniors or people with a disability.

The application for a Site Compatibility Certificate is therefore submitted to the NSW Department of Planning and Environment for assessment. Think Planners recommends that a Site Compatibility Certificate be issued for the development.

This application for a Site Compatibility Certificate is submitted with various supporting statements and technical studies including:

1. Urban Design Report by Allen Jack Cottier
2. Flora fauna assessment by Ecological Australia
3. Flooding assessment by GRC Hydro
4. Heritage Assessment by Ecological Australia
5. Acoustic Report by Acoustic Logic
6. Traffic and Parking Assessment by Traffix
7. Arborist Report by Australis
8. Asbestos Management Plan by Trace Environmental
9. Electrical Services Infrastructure Report by Haron Robson
10. Geotechnical Report by JK Geotechnics
11. Hydraulic Services Statement by Warren Smith and Partners
12. Remediation Action Plan by Trace Environmental
13. Social Infrastructure Assessment by Urbis.
14. Hydraulic Concept Plan by Warren Smith and Partners.
15. Supporting letter from Vision Lifestyle Projects.

DEVELOPMENT HISTORY

The site has been in operation since November 2014, with a brief summary of the key development stages and time frames provided below.

Development History	
Date	Action
November 2014	Development commences of a site concept masterplan across whole of Sports Club lands
September 2015	Strategy agreed with Club to go forward based on: Prepare and lodge SCC for approximately 800 retirement units on Club RE2 land Detailed design for sporting facilities Prepare and submit Planning Proposal for zoning amendments to Club IN1/2 land
January 2016	Presentation made to Blacktown Council Planning Proposal submitted to DPE SCC application submitted to DPE
July 2016	SCC approved by DPE – valid for 2 years.
August 2017	Urbis request whether an extension to SCC can be sought, following consultation with Club General Manager Neale Vaughan
March 2018	New SCC application made to Department of Planning
October 2018	DPE announces changes to legislation that affect approval of SCC's. SCC currently with DPE will now be sent to Sydney Central Planning Panel for approval. DA cannot be lodged until the SCC is approved.
January 2019	Planning Panel secretariat advises matter will be determined on 23 January 2019. Advice received after is that this was a briefing only.

The Blacktown Workers Sports Club has undertaken a review of their landholdings and established there is an opportunity to diversify the uses on the site to assist with long term financial viability for their operations. The Blacktown Workers Sports Club has more than 54,000 members and out of these members 52% or 28,000 are over the age of 55 years.

On 1 April 2019 the Sydney Central City Planning Panel recommended refusal the issue of a Site Compatibility Certificate for the following reasons:

- *The site is not zoned primarily for urban purposes as indicated in the application. The Panel considered, amongst other things, the specific objectives of the zoning of the site, RE2 Private Recreation in the Blacktown LEP, and is of the opinion that it is not zoned primarily for urban purposes.*
- *The proposal is for, amongst other things, 800 self-contained dwellings. Clause 13 of the Seniors SEPP provides that development for the purposes of in-fill self-care housing, a subset of self-contained dwellings, may only be carried out on land*

zoned primarily for an urban purpose (also see Clause 15(b) and 17 of the Seniors SEPP).

- *The site is adjoined by land zoned R2 Low Density Residential to the immediate east. The Panel is satisfied that the site can therefore be characterised as land adjoining land zoned primarily for urban purposes. This therefore constrains the type of seniors housing as defined by Clause 15(b) and 17 of the Seniors SEPP.*
- *The Panel is of the opinion that the site of the proposed development is suitable for more intensive development for purposes of seniors housing under the Seniors SEPP.*
- *The Panel is, however, of the opinion that the proposed development is not compatible with the surrounding environment and land uses having regard to the criteria in Clause 25(5)(b)(v) of the Seniors SEPP. This is principally because building height, building bulk and dwellings yield is not compatible with the existing or future desired character of the area.*

The determination issued by the Panel makes it clear the Panel is, of the opinion the land is not zoned primarily for urban purposes and is not zoned primarily for urban purposes. The Panel agrees the site is adjoined by land zoned R2 Low Density Residential and can therefore be characterised as land adjoining land zoned primarily for urban purposes as required by Clause 15(b) and 17 of the Seniors SEPP.

However, the Panel is also of the opinion the site the proposed development is incompatible with the surrounding environment and land uses having regard to Clause 25(5)(b)(v) of the Seniors SEPP.

The key development statistics of the revised scheme presented under this application are presented in the table overleaf.

Principally, the yield has been reduced for the significantly from 880 self-contained dwellings to 480 dwellings. The building heights and forms are also reduced to ensure the proposal relates better to surrounding development and established precinct character. The building height along Penny Place has dropped to 3 storeys with a tower setback from the street wall cognisant of the existing built form character along Penny Place. Previously the presentation to Penny Place comprised high retaining walls. The revised scheme represents a more integrated approach to the established character along Penny Place. The larger residential aged care facility has been relocated on the site from the dominant corner at Reservoir Road to the north western part of the site.

More details are provided in the following table which provides a comparison of the previous SCC application and the revised scheme which forms this application.

Proposed changes to the previous scheme		
Component	Previous	Proposed
Self-contained dwellings	880	480 (noting reduction by 45.5%)
Residential aged care beds	160	No change
Floor space	Indicative residential floor space of 103,516m ² .	Indicative residential floor space of 67,630m ²
Number of buildings	13	12
Parking spaces	880 cars	652 cars
Basement	Seven individual basements to enable appropriate construction staging.	Same number of basements however, the basements are all linked in future stages for ease of waste collection.
Access	Three access points from Penny Place. All basement access is gained via at grade circulation hardstand.	Access from Penny Place to the residential aged care facility basement only with minor service road – see Road 5. Remaining access from internal road network accessed off Reservoir Road and the norther part of the site.

SERVICED SELF CARE HOUSING

There was also an issue raised at the Sydney Central City Planning Panel about whether the proposal is for infill self care housing or serviced self care housing. The proposal is for serviced self care housing which is permitted on the site which has been deemed to not be zoned for urban purposes by the Planning Panel.

Serviced self care housing as described in Clause 13 of the SEPP is:

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 proposed development has been designed with the future servicing needs of the residents in mind. To demonstrate how the servicing for the future residents has been a prime consideration for the Club a letter is supplied with this report from Vision Lifestyle Projects who confirm that detailed consideration that has gone into the level of service to be provided to the residents of this development.

The proposal is categorised as serviced self-care housing in accordance with Clause 42 of the Seniors Housing SEPP because:

- A home delivered meal service will be available to the residents. Meals can be provided to the residents from either the kitchen located within the Workers Club or from the kitchen within the Residential Aged Care Facility. Three meals a day can be provided to the resident, depending on their individual care needs.
- Personal care and home nursing services will be available.
- Assistance with housework will also be available to the residents.
- The residents will also have access to a bus as per the requirements of Clause 43 of the Seniors Housing SEPP.

There are also a series of additional services that are to be provided to the residents which are listed in the accompanying letter from Vision Lifestyle Projects. The Club is fully committed to ensuring residents can aged comfortably in place and will ensure services to meet the needs of residents are available at all times.



SITE AND LOCALITY DESCRIPTION

The subject site is legally described as being part of Lot 201 DP880404, is currently occupied by the Harold Laybutt Sporting Complex. The location of the site on the broader allotment is shown below.

Figure 1: Aerial Map Extract of Subject Site (AJC Report).



Located within the Blacktown Workers Club Precinct, the site is bounded by the workers sports club and parking areas to the north, industrial units to the west, is separated by Penny Place from industrial units to the south and is separated by Reservoir Road from single dwellings and townhouse developments to the east.

The site has a frontage to Reservoir Road of 225m on the east and is approximately 594m wide along the frontage to Penny Place which is on the southern side of the site. Reservoir Road serves to divide the site from the suburban residential precinct which is located to the east of the site.

The site itself is surrounded by open playing fields which contain mature trees. There is a maintenance shed structure associated with the playing fields located within the site.

The site is afforded a northerly aspect with only a small amount of overshadowing resulting from the existing Worker Club buildings within the land to the north. The

Reservoir Road frontage is impacted by road traffic noise and there is likely to be some road traffic noise coming from the nearby Great Western Highway.

The main access to the site is provided from the internal road network off Reservoir Road. There is an opportunity to provide access to the site from Penny Place with minimal disruption to the local network.

Figure 2: Context Aerial Map Extract of Subject Site (AJC Report).



The portion of the site on which the development is located, is 5.41 hectares in size.

The site contains several small trees that are to be removed and a few existing street trees are also to be removed.

Photographs are provided below that give context to the site.



Photograph 1: Shows the subject site as viewed from the workers club viewing south west.



Photograph 2: Shows the subject site as viewed the workers club viewing south.





Photograph 3: Shows the subject site as viewed from the intersection of Penny Place and Reservoir Road, viewing north west.



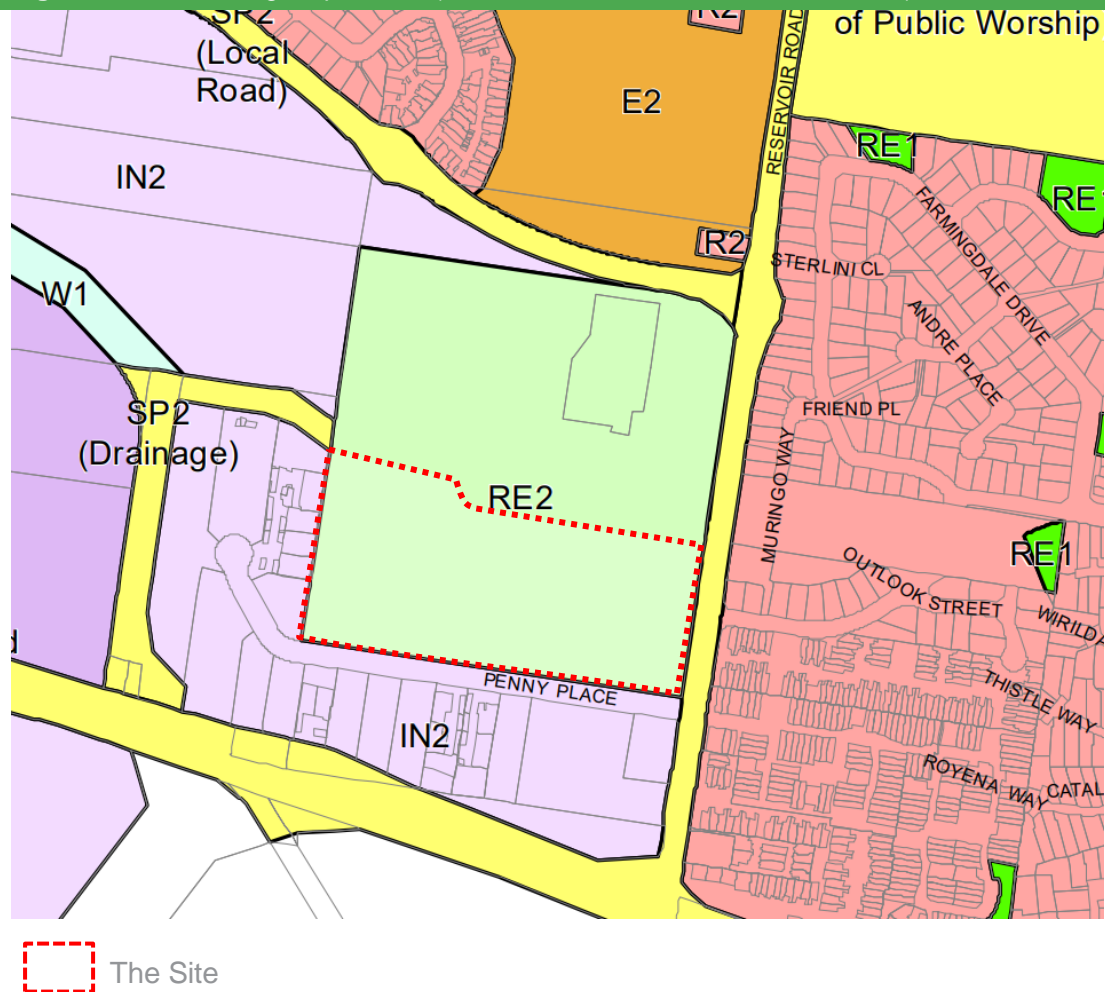
Photograph 4: Show Blacktown Workers Club, located adjacent to the site to the north.



LAND ZONING

As shown on the mapping extract the site zoned RE2 Private Recreation. In addition, the extract below shows the site is adjacent land zoned IN2 Light Industrial, R2 Low Density Residential, SP2 Classified Road and E2 Environmental Conservation.

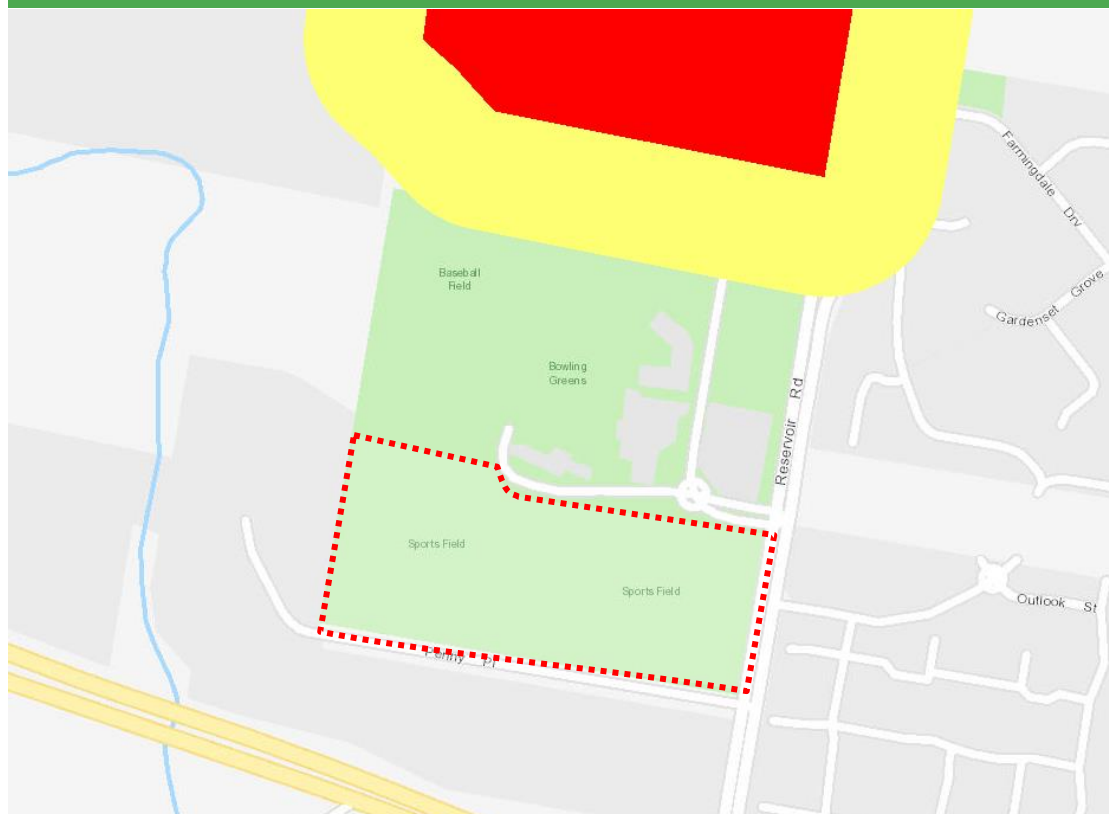
Figure 3: Land Zoning map extract (Source: Blacktown LEP 2015 LZN_014).



BUSHFIRE HAZARD

The subject land is not identified as bushfire affected however the broader site, Blacktown Workers Club site, is marginally impacted by bushfire affectation as shown below.

Figure 4: Bushfire Mapping



 The Site

Future development applications for the site will initially propose subdivision of the land to excise the land shown in red above which means ultimately the subject site will not be the subject of a bushfire affectation.

The future proposed subdivision will be identified as a special fire protection purpose and will require a bushfire assessment report to be undertaken as is the normal protocol for any proposed subdivision of bushfire affected land.

FLORA AND FAUNA

A flora and fauna assessment report is included with this submission as prepared by Ecological Australia. The report concludes there are no threatened flora within the study area and the removal of Eucalyptus and Casuarina species will occur as part of the future development. However, these existing species are of low ecological constraint and not part of a native vegetation community as these species were planted as a landscape feature when the playing fields were established.

There are a range of mitigation measures to be implemented on the site to mitigate against the impacts which would be implemented at the development application stage.

An arborist report prepared by Australis Tree Management reveals that 38 trees can be retained within a future development scheme and 4 of these have high retention value. There are 24 trees to be removed to facilitate the proposed development.

FLOODING AND STORMWATER

A flood assessment is included with this application which shows the site has been modelled to show if the land is impacted by the 1 in 100 year flood level.

The site is impacted by very shallow overland flow only. Water that is excess of the existing drainage system capacity will flow down the northern and southern flow paths. Flooding at the subject in the 1% AEP event is minor in extent. The development has the lowest habitable floor levels above the PMF level and evacuation in place is the default position. If egress is required, this is possible even in the PMF event and can be safely undertaken via Penny Place and Reservoir Road.

The flood report confirms that access to the site is possible during both the 1 in 100 year flood event and the PMF event and as such seniors living can be achieved with risks kept to an acceptable level.

ABORIGINAL HERITAGE

An extensive search has been undertaken (and is provided with this submission) for the site by Ecological Australia. This assessment has concluded the site does not contain potential archaeological sites, as the natural ground surface has been filled and levelled to create the existing sporting field.

The development for a Seniors Living Village is an appropriate use of the site from an archaeological aspect and the details in the enclosed report can be considered for the Site Compatibility Certificate application.

EUROPEAN HERITAGE

As evident via the heritage map extract in the following the site is not a heritage item, it is not located within a heritage conservation area and it is not within proximity of any surrounding heritage listed items that are likely to be affected by the proposal.

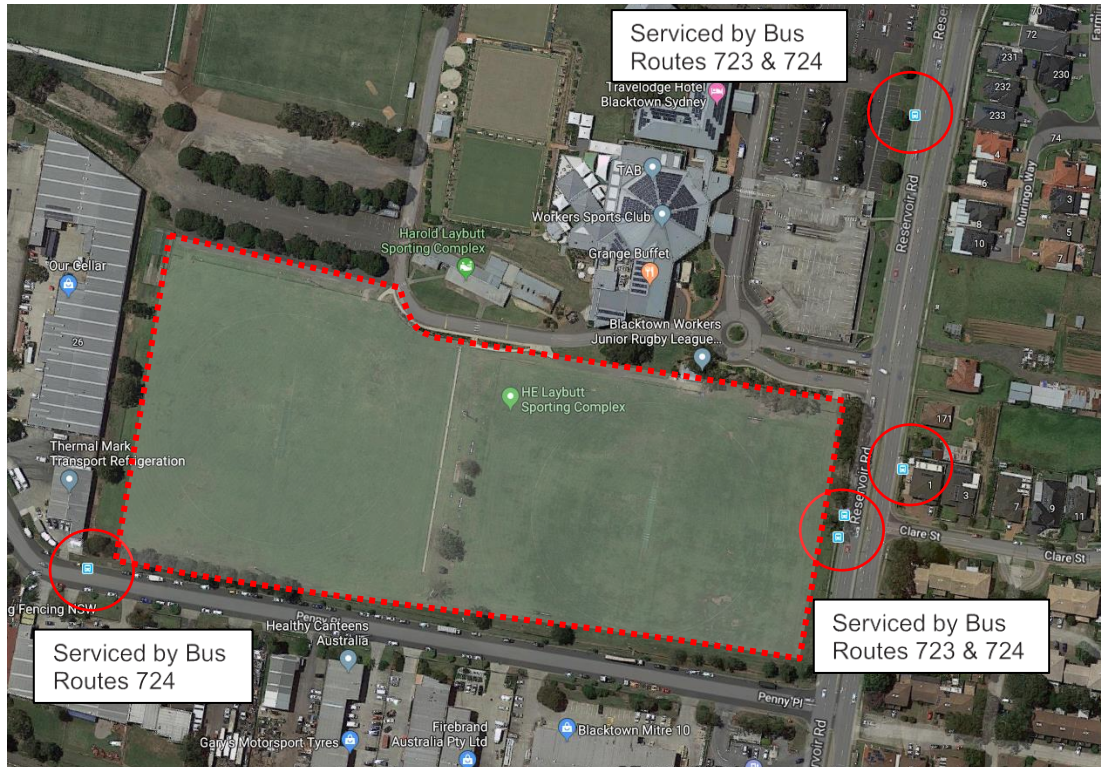
Figure 5: Heritage Mapping



ACCESS AND TRANSPORTATION

The subject site is within a 400m walking distance of several bus stops, located on Reservoir Road and Penny Place, which provide services to Blacktown Train Station, Westpoint Shopping and Centre bus interchange, as well as services in the other direction to Mount Druitt Station and Westfields. A map of the site and its proximity to local bus stops is provided overleaf.

Figure 6: Local Bus Stops.



Bus Stops: ○



Figure 7: Bus Route 723 Map

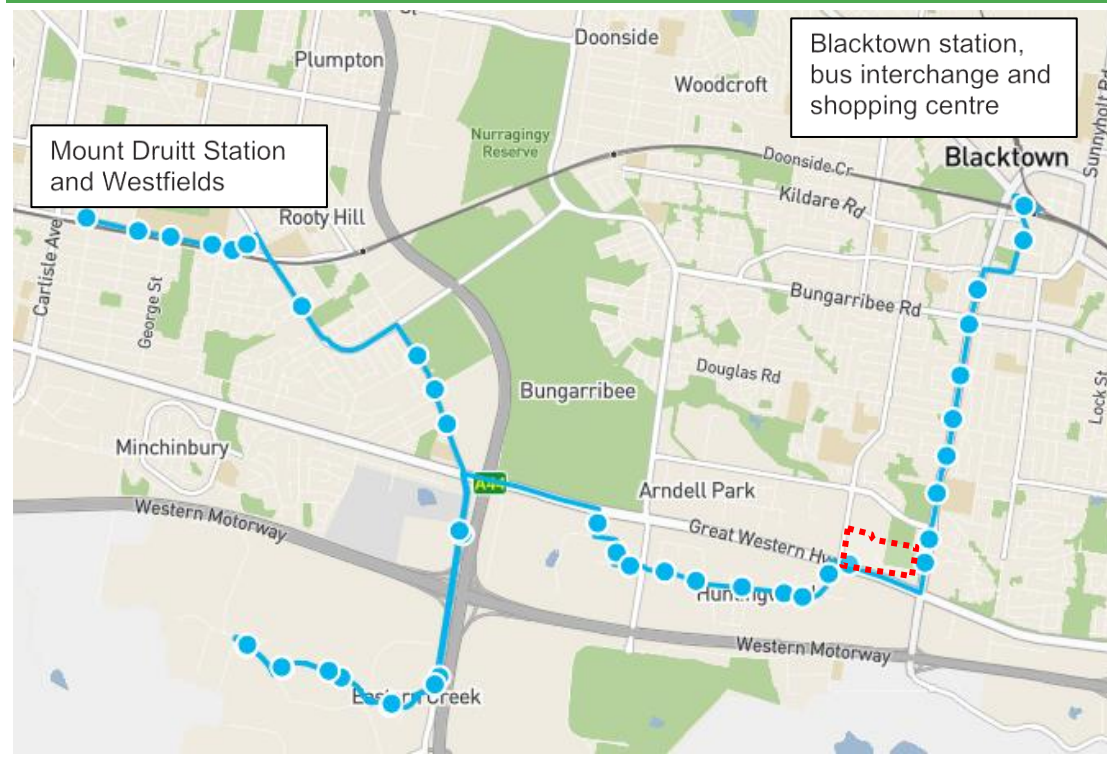
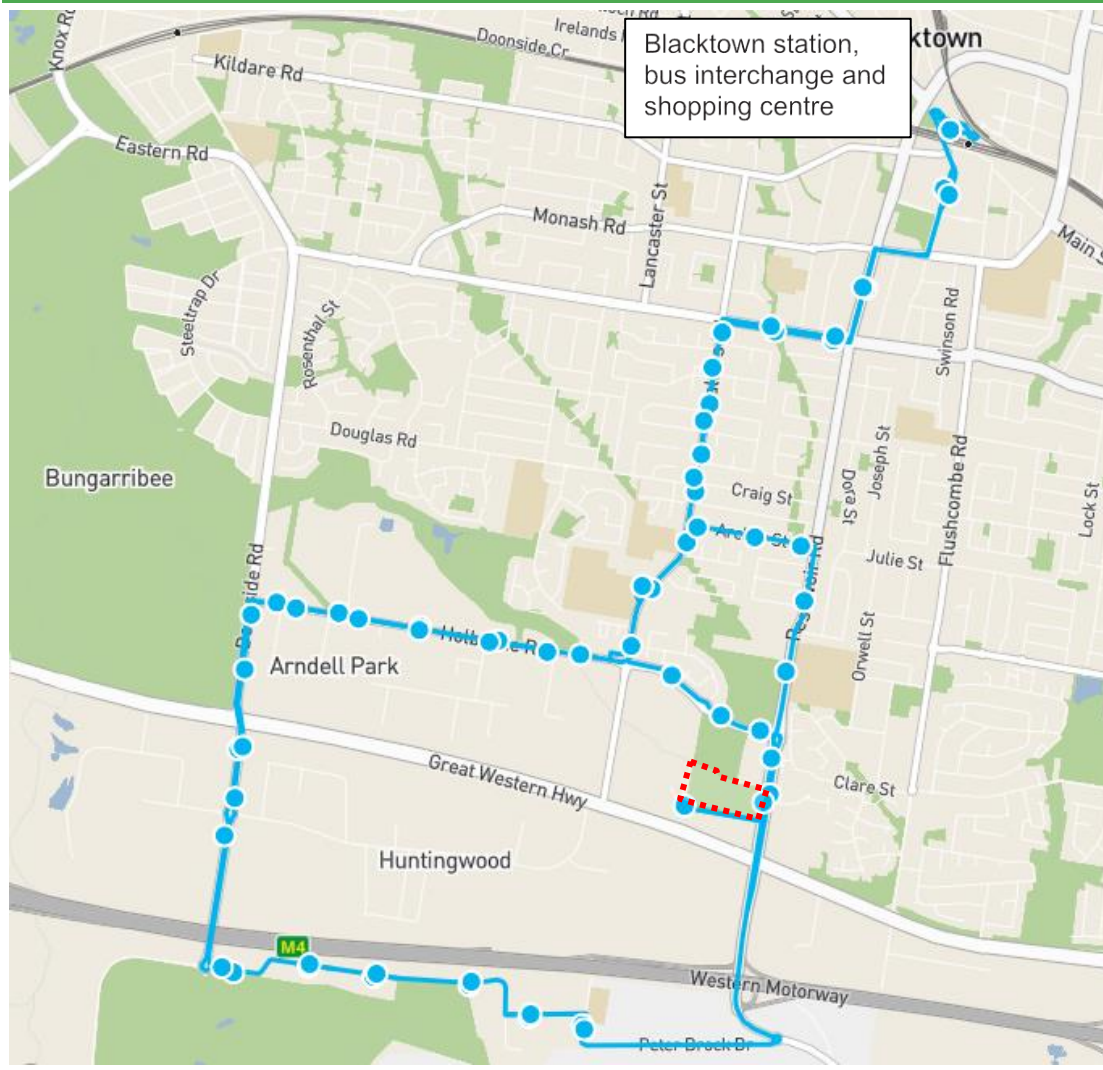


Figure 8: Bus Route 724 Map

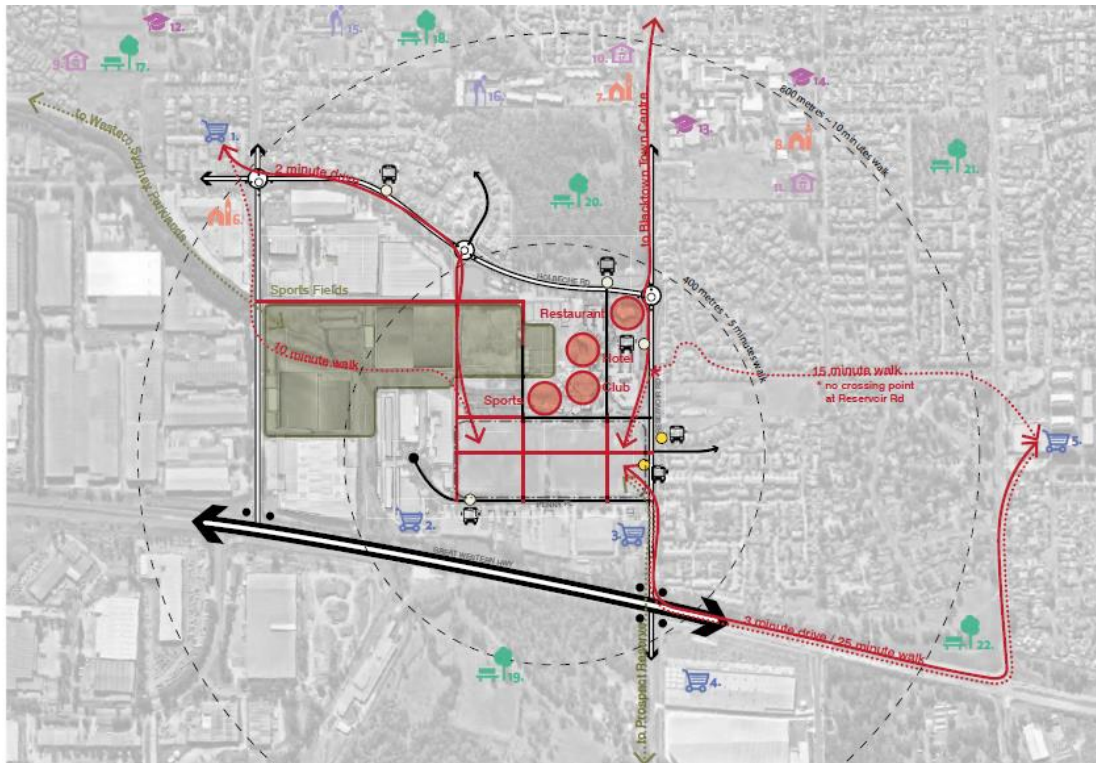


The bus routes provide regular services to 2 regional centres being Blacktown and Mount Druitt, with Blacktown being within very close proximity.

These regional centres provide a full range of services and facilities inclusive of:

- A wide mix of retail and commercial services
- Community facilities
- General and specialist medical practitioners
- Bus interchanges
- Train stations.

Figure 9: Local Context for Local Amenities (AJC Report)



As demonstrated in the local context diagram prepared by AJC Architects, the site is near several local amenities including:

- pharmacy
- supermarkets
- parks
- walking and cycling tracks which provide access to the Western Sydney parklands.

There are also various community related facilities located within proximity to the site including:

- Blacktown Workers Sports Club
- sporting facilities
- hotel
- restaurant.

The site is ideally located with access to shopping, sporting and club facilities as well as local food outlets. The proposed Seniors Living Village is also ideally located adjacent to an existing residential area.

SERVICES AND UTILITIES

The subject lands and adjoining urban development all enjoy access to the Sydney Water reticulated water and sewer networks.

Further the site and adjacent lands are served by a full range of energy and telecommunication facilities as well as access to both regional and local road networks.

There are currently no known capacity constraints relating to those local services and infrastructure, however these will be further investigated as part of the future planning process.

ENVIRONMENTAL SITE INVESTIGATION

A detailed site investigation was conducted by Trace Environmental for this site which identified asbestos in the form of asbestos-containing materials, friable asbestos and or asbestos fines within fill material at concentrations exceeding the adopted human health assessment criteria at site locations on the upper playing field and at one location at the northern boundary of the lower playing field.

These locations require remediation and or management to make the site suitable for the proposed residential development. The proposed remediation strategy for the site comprises retaining of asbestos impacted materials on site (i.e. beneath basement hardstands within on-site building footprints and roads/hardstand areas).

Further details of the proposed remediation strategy are including in the Remediation Action Plan submitted with this proposal as prepared by Trace Environmental. The proposed remediation strategy will be supervised by a suitably qualified and experienced environmental consultant and following completion of the work all certificates and validation reports will be finalised.

ACOUSTIC ENVIRONMENT

There is an acoustic assessment provided with this submission which considered the external noise impacts on the proposed seniors living development and residential aged care facility. The report demonstrates the internal noise requirements of the Department of Planning's Development Near Rail Corridors and Busy Roads (Interim Guideline) and Australian Standard AS2107:2000, as outlined in the acoustic report.

Importantly, the report concludes that all the acoustic treatments will be determined at the development application stage.

PROPOSAL

DESCRIPTION OF DEVELOPMENT PROPOSAL

The Blacktown Workers Club has a long successful relationship with the local community. To serve their members they are planning to bring a new level of retirement living to Blacktown. The proposal has been designed to frame around a 'living' road as an active shared space, giving pedestrians priority, the buildings provide high levels of amenity and look out onto framed views of landscape spaces. The site will be transformed into a vibrant new retirement community.

The vision is to create a modern senior living residential precinct which has a strong network of community facilities with through site connection to create the framework for the building form. The block planning comprises perimeter blocks with courtyard apartments to provide a landscape presentation to all the ground floor apartments. This seeks to enhance the landscape presence of the development and soften the appearance of the buildings and to create a sense of community for the residents. There are a variety of new landscaped areas proposed within the development scheme including:

- shared central road to promote a pedestrian village
- landscape courtyards which combine deep soil and on deck planting
- communal landscape open spaces which include facilities such as barbeques and rest areas
- green roof
- village green spaces
- wellness courtyard which is accessible from the pool and gym.

The development has been reduced in scale since the previous proposal. The figure overleaf shows a 3D aerial view of the proposed development and provides context to its surrounding locality.

Figure 10: 3D aerial view of the proposed development and its surrounding context
(Source: Architectural Plans).



A brief summary of the proposal details is provided below:

- 480 Independent Living Units (ILUs) with a gross floor area of 59,690m²
- 160 Retirement Aged Care Facility (RACF) with a GFA of 7,670m²
- 652 car parking spaces
- Communal facilities with a GFA of 3,220m²
- Common open space 14,475m².

Figure 11: Proposed Block layout and building storeys (Source: Architectural Plans).



Architectural concept plans form part of the package of documentation accompanying the application. The design provides for separate building blocks to break up the bulk and scale of the proposal to be more consistent with the built form of the area.

CONSISTENCY OF PROPOSAL WITH STATUTORY CONTROLS

The relevant Statutory Planning Controls include:

- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004
- State Environmental Planning Policy No. 65 Design Quality of Residential Apartment Development
- Blacktown Local Environmental Plan 2015.

STATE ENVIRONMENTAL PLANNING POLICY (HOUSING FOR SENIORS OR PEOPLE WITH A DISABILITY) 2004

The site forms part of the larger Blacktown Workers Club which is an existing registered club pursuant to the Registered Clubs Act 1976. Accordingly, State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 applies to the subject lands as a consequence of the operation of clause 4(1)(b) of that planning instrument.

This report demonstrates that the site adjoins land zone for urban purposes therefore pursuant to Clause 4(5)(b) of the SEPP, the subject site can be treated as land zoned primarily for urban purposes. The significance of this is that the SEPP operates in a manner that allows the site to be developed for serviced self care seniors housing.

However, Clause 4(6)(a) in tandem with Schedule 1 of that planning instrument provides circumstances where the policy does not apply. Importantly, lands listed at the schedule must be identified as such in another environmental planning instrument.

An assessment against this schedule is provided over the page that demonstrates that the Schedule 1 provisions are not triggered by the proposal.

The SEPP also provides other criteria inclusive of requirements for access to transport, retail and community services. The site analysis undertaken previously in this report reveals that the subject lands satisfy all identified criteria. Detailed consideration of the proposal under Clause 25(5)(b) of the SEPP is provided later in this report.

It is therefore considered that under the existing statutory planning framework the site could accommodate Seniors Housing Development pursuant to this SEPP.

Schedule 1: Environmentally Sensitive Lands

Consideration against the Schedule 1 matters is provided below to confirm that the site is not excluded from the operation of the SEPP.

Schedule 1 Matters	Commentary
(a) coastal protection,	Not identified.
(b) conservation (but not land identified as a heritage conservation area in another environmental planning instrument),	Not identified.
(c) critical habitat,	Not identified.
(d) environment protection,	Not identified.
(e) open space,	Not identified as public open space, noting the site comprises private recreation land.
(f) escarpment,	Not identified.
(g) floodway,	Not identified.
(h) high flooding hazard,	Not identified.
(i) natural hazard,	Not identified.
(j) (Repealed)	-
(k) scenic (but not land that is so identified if:	
(i) the land is within a residential zone in which development of two storeys or more in height is permitted, or	Not identified.
(ii) an adjacent residential zone, also identified as scenic, permits development of two storeys or more in height),	Not identified.
(l) water catchment,	Not identified.
(m) natural wetland.	Not identified.
Land shown cross-hatched on the bush fire evacuation risk map.	Not identified. Noting the broader site is marginally affected by bushfire however the subject land is not shown as cross-hatched on the bushfire evacuation risk map.

STATE ENVIRONMENTAL PLANNING POLICY NO 65 DESIGN QUALITY OF RESIDENTIAL APARTMENT DEVELOPMENT (SEPP 65)

SEPP 65 seeks 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 seniors housing and further details as well as assessment is to occur at the detailed development application stage.

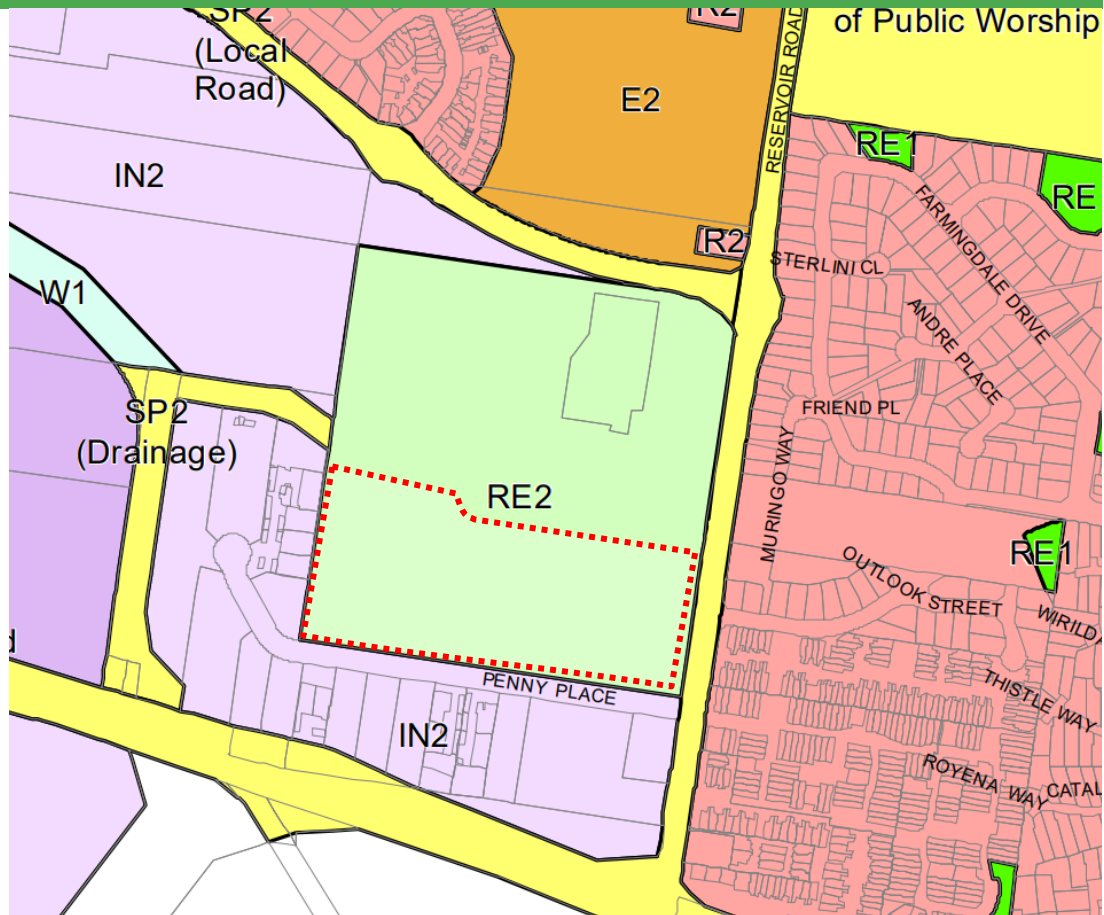
BLACKTOWN LOCAL ENVIRONMENTAL PLAN 2010

Zoning of Site and Adjacent Land

As shown on the mapping extract the site zoned RE2 Private Recreation, noting the location shown in indicative. In addition, the extract below shows the site is adjacent

land zoned IN2 Light Industrial, R2 Low Density Residential, SP2 Classified Road and E2 Environmental Conservation.

Figure 12: Land Zoning map extract (Source: Blacktown LEP 2015 LZN_014).



The prescribed zone objective are as follows:

- 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.

The current proposal is aligned with the primary use of the site for private recreation, noting that the proposal is for the development of part of the broader site conducive to residential development and noting that the development is proposed in order to ensure the ongoing viability of the Blacktown Workers Club.

The following land uses are permitted in the zone:

Building identification signs; Caravan parks; Child care centres; Community facilities; Environmental facilities; Environmental protection works; Function centres; Hotel or motel accommodation; Information and education facilities; Kiosks; Recreation areas;

Recreation facilities (indoor); Recreation facilities (outdoor); Registered clubs; Respite day care centres; Restaurants or cafes; Roads

All other forms of development are prohibited on the site, including residential accommodation and therefore an SCC continues to be required for Seniors Housing.

Other Relevant Instrument Provisions

The table below deals with the remaining provisions of the LEP in a table format to confirm whether clauses are relevant to the site and consideration of the Site Compatibility Certificate.

Blacktown Local Environmental Plan 2015 – Compliance Table			
Clause	Controls	Comments	Complies
Part 4 Principal Development Standards			
4.1	Minimum Subdivision Lot Size.	No minimum lot size is identified for the site under the Blacktown Local Environmental Plan 2015 Map Sheet 014.	N/A
4.3	Height of Buildings	No Maximum Building Height control applies to the subject site under the Blacktown Local Environmental Plan 2015 Map Sheet 014.	N/A
4.4	Floor Space Ratio	No FSR control applies to the subject site under the Blacktown Local Environmental Plan 2015 Map Sheet 014.	N/A
Part 5 Miscellaneous Provision			
5.10	Heritage Conservation	The site is not impacted by heritage. See earlier section for detail.	N/A
Part 7 Additional Local Provisions			
7.1	Flood Planning	The site is not identified as being flood prone under the Blacktown Local Environmental Plan 2015 Map Sheet 014.	N/A
7.2	Terrestrial Biodiversity	The site is not identified on the Terrestrial Biodiversity Map under the Blacktown Local Environmental Plan 2015 Map Sheet 014.	N/A
7.3	Riparian land and watercourse	The site does not comprise any riparian land or watercourses.	N/A
7.4	Action street frontages	The site is not affected by the active street frontage controls.	N/A

Clause	Controls	Comments	Complies
7.5	Essential services	The development site is well serviced by water and sewer and the required utility clearances will be obtained prior to works commencing on site.	Yes
7.6	Converting serviced apartments to residential flat building	Not applicable to the proposal.	N/A
7.7	Design excellence	Not applicable to the proposal.	N/A
7.8	Development on certain land in zone IN1	Not applicable to the proposal.	N/A
7.9	Development with frontage to certain roads in zone SP2	<p>Vehicle access is provided from the internal road network and not from Reservoir Road as such the safety, efficiency and ongoing operation of the road will be adversely affected by the development as a result of:</p> <ul style="list-style-type: none"> (i) the design of the vehicular access to the land, or (ii) the emission of smoke or dust from the development, or (iii) the nature, volume or frequency of vehicles using the road to gain access to the land. <p>An acoustic report is provided with this submission which considers both the existing and future land uses on the proposed development. The report concludes that:</p> <p>(c) whether the development is of a type that is sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the road.</p> <p>Acoustic Logic assessed the impact of surrounding existing and future land uses on the proposed development. There is also assessment of external noise impacts on the proposal. In conclusion the detailed acoustic treatments will be determined at DA stage.</p> <p>The acoustic report recommends that potential noise impacts can be effectively managed for the future residents of the development.</p> <p>A traffic and parking assesment (see enclosed) has been carried out for the proposal in accordance with the Blacktown Development Control Plan 2015 and State Environmental Planning Policy (Housing for</p>	Yes

Clause	Controls	Comments	Complies
		<p>Seniors or People with a Disability) 2004. This has revealed there is a requirement for 491 car parking spaces. The preliminary concept designs show there is sufficient area for basement level car parking with access possible from Penny Lane and other internal roads from within the Blacktown Workers Sports Club site.</p> <p>A detailed traffic impact analysis has demonstrated that the full development will result in minimal increases in delays for the wider network. Noting that an upgrade is proposed to Reservoir Road with traffic signals and pedestrian facilities. With the proposed upgrades, the resultant traffic impacts are considered to be acceptable.</p>	
7.10-7.13	Various	<p>The site is not subject to any of the controls contained in these clauses as they are area or site specific clauses and are not relevant to the proposal having regard to relevant mapping and the areas nominated by each Clause.</p>	N/A

STRATEGIC JUSTIFICATION & PUBLIC INTEREST

The below contains detail regarding the Strategic Justification and relationships with regional and local strategies.

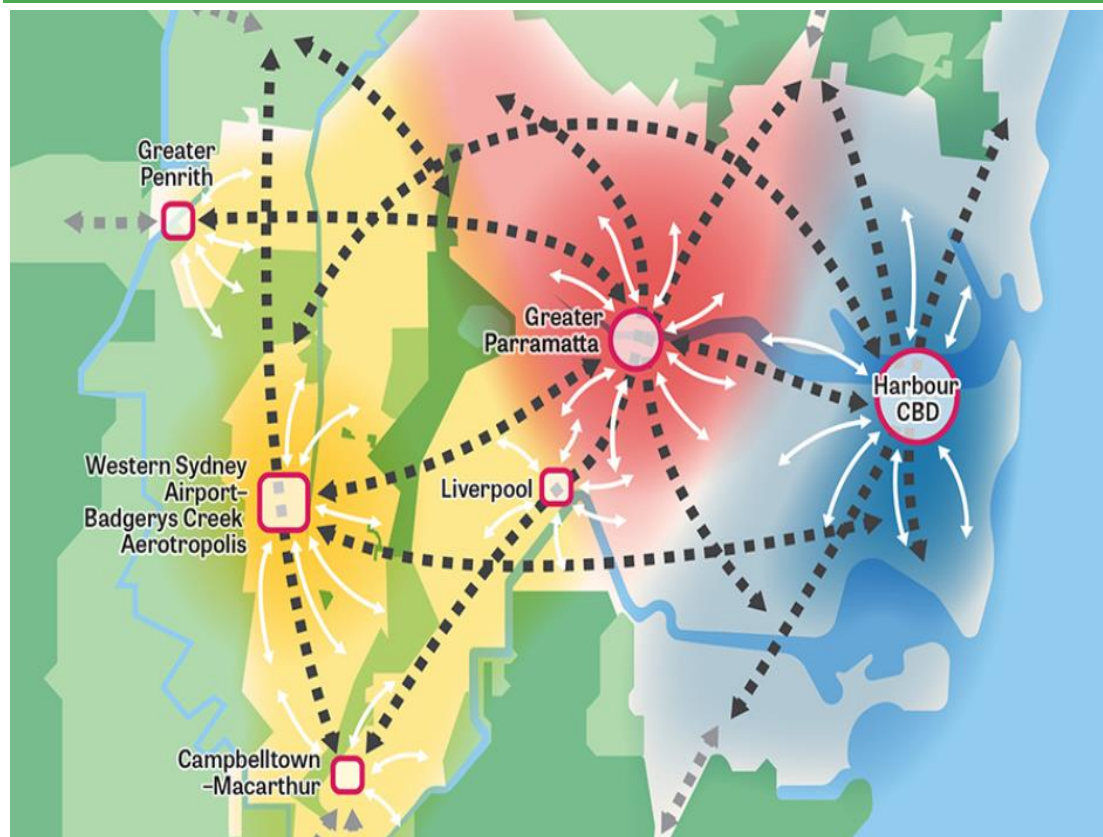
RELATIONSHIP WITH REGIONAL AND LOCAL STRATEGIES

A Metropolis of Three Cities – Greater Sydney Region Plan (Greater Sydney Commission March 2018)

The Metropolis of Three Cities – Greater Sydney Region Plan provides a framework for the predicted growth in Greater Sydney.

Key themes based on delivering a metropolis of three 30-minute cities which are a follow on from the ten directions envisioned by the Greater Sydney Commission. This vision is set out in the structure plan shown in Figure 13 below.

Figure 13: Extract from A Metropolis of Three Cities



The four key themes are focused on infrastructure and collaboration, liveability, productivity and sustainability. The proposal is aligned with these key themes, directions, metrics and objectives by:

1. Infrastructure and collaboration. The subject land is located within an existing urban area. The site is located within proximity to the Blacktown CBD which is within the 30-minute city scenario.
2. Liveability. The reference architectural design drawings provided with this proposal show that liveability for the future residents is a primary consideration for the future building design. Solar access and cross ventilation have been maximised along with general compliance with the relevant planning controls.
3. Productivity. The proposal capitalises on the use of existing urban land and seeks to create an accessible and walkable city with pedestrian links and bike paths as well as promoting additional local employment within the urban context.
4. Sustainability. The proposal facilitates building capacity based on existing and committed infrastructure. This seeks to shape strong, connected community making the revitalised precinct at Blacktown and Arndell Park more resilient.

Central City District Plan (Greater Sydney Commission March 2018)

The Central City District Plan sets out the priorities and actions for the Central River City and these are structured around the same key themes as highlighted in the Greater Sydney Region Plan. As relevant to the subject site the importance of supporting sustainable growth within Blacktown in terms of both jobs and housing are continually emphasised in the District Plan. Particularly with reference to the 30-minute city. The proposal seeks to deliver both additional housing but also jobs within a 30-minute city scenario.

The proposal seeks to make a valuable contribution to Blacktown and more specifically Arndell Park and its continued growth as a strategic centre. This will facilitate the creation of additional jobs and vast benefits to the local economy as well as providing much needed housing for senior people within the community.

Expediting the delivery of housing brings more dwellings to the market which in turn assist with lowering the cost of seniors housing. Delivering more dwellings and within shorter timeframes aims to respond to the current housing crisis in Western Sydney where scarcity has resulted in an affordable housing shortage and in particular housing for the ageing community.

Development and activation of this land will bring far reaching benefits to this local community as well as the opportunity to bring on board interesting and high quality seniors housing to cater for an ageing population.

In summary, this proposal seeks to deliver on the vision set forward in the Central City District Plan by:

1. Creating conditions for a stronger economy by investing in the establishment of seniors housing on land that is already serviced urban land.
2. Development of a more accessible and walkable city through the injection of new housing within walking distance of community infrastructure.
3. Delivering housing to meet both the 5 and 20-year strategic housing supply targets. Blacktown LGA is scheduled to deliver more than 13,950 new homes over the coming 5 years which is ambitious target that can only be met with delivery of development as contained in this proposal.
4. Expediting the delivery of new housing stock to ease the pressure of demand resulting in a generally more affordable housing product.
5. Reduced emissions through both building environmental performance that will be fully integrated into the future development scheme.
6. Enhancing the role of Greater Blacktown as the economic anchor by delivering both jobs and housing.
7. The objectives of the proposal are considered to align closely with the documented priorities for the Central City.

Our Blacktown 2036

Our Blacktown 2036 is a community based vision document which provides a roadmap of what's important to the Blacktown City community. Overarching priorities identified in this policy seek to:

- Improve housing choice
- Improve housing affordability
- Create great places
- Foster cohesive communities
- Respond to people's needs for services.

The proposal is entirely aligned with this vision in providing highly sort after seniors housing in an ideal location that will be well serviced to deliver the day to day needs for the future residents. The proposed building layout and arrangement of green spaces throughout the reference scheme demonstrates the desire to deliver a high quality and highly amenable residential environment.

The site is well located to services and public transport and is not affected by constraints of topography or flooding. Therefore, the proposal aligns with the strategy in providing housing diversity.

CONSIDERATION OF SECTION 9.1 DIRECTIONS

Consideration of Section 9.1 Directions		
Consideration of s. 9.1 Directions	Relevance	Comment
1. Employment and Resources		
1.1 Business and Industrial Zones	✓	The proposal does not seek to reduce any land that is currently zoned for business or industrial uses. The proposal is consistent with this Direction.
1.2 Rural Zones	-	The proposal does not relate to rural zoned land.
1.3 Mining, Petroleum Production and Extractive Industries	-	The proposal does not relate to land that is likely to be useful for extractive industries.
1.4 Oyster Aquaculture	-	The proposal will not impact on any priority oyster aquaculture areas.
1.5 Rural Lands	-	The proposal does not relate to rural land.
2. Environment and Heritage		
2.1 Environment Protection Zones	-	The site is not currently zoned for environmental protection purposes.
2.2 Coastal Protection	-	The land is not within a coastal zone.
2.3 Heritage Conservation	✓	The proposal does not seek any changes to the existing heritage conservation provisions of the LEP and DCP. A heritage assessment is provided with this submission demonstrating there are no expectant heritage impacts resulting from this development.
2.4 Recreation Vehicle Areas	-	The proposal does not relate to recreation vehicles or land with a high conservation value.
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs This direction applies to the local government areas of Ballina, Byron, Kyogle, Lismore and Tweed.	-	This direction does not apply in the Blacktown Local Government Area.
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones	✓	The proposal is consistent with the direction. The proposal seeks to facilitate the development of

		seniors housing through a site compatibility certificate.
		The proposal represents a more efficient use of existing infrastructure and services and reduces the consumption of land for housing through urban renewal.
3.2 Caravan Parks and Manufactured Home Estates	-	The proposal does not seek amend the current prohibition of caravan parks on this site.
3.3 Home Occupations	-	No changes to the existing provisions.
3.4 Integrating Land Use and Transport	✓	The proposal is consistent with the direction. The subject site is within proximity of public transport infrastructure. The site is well serviced by transport infrastructure and has optimal access to employment opportunities within the core of the Blacktown CBD.
3.5 Development Near Licensed Aerodromes	-	The land is not within the vicinity of an aerodrome.
4. Hazard and Risk		
4.1 Acid Sulfate Soils	-	The site is not known as containing acid sulfate soils.
4.2 Mine Subsidence and Unstable Land	-	The site is not within a mine subsidence district.
4.3 Flood Prone Land	-	The proposal does not seek to change the existing Council controls relating to flooding. Flood impact is to be further considered in detail at development application stage.
4.4 Planning for Bushfire Protection	-	The larger site is affected by bushfire planning provisions and further details of this will be considered at the detailed application stage. Noting there is a fringe area at the northern part of the larger site that is affected by bushfire however the subject land is not shown as hatched and impacted by a bushfire evacuation risk map.
5. Regional Planning		
5.2 Sydney Drinking Water Catchments	-	This direction does not apply to land within Blacktown local government area.
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	-	This direction does not apply to land within Blacktown local government area.
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	-	This direction does not apply to land within Blacktown local government area.
5.8 Second Sydney Airport: Badgerys Creek	-	The site is not near the Second Sydney Airport: Badgerys Creek.

5.9 North West Rail Link Corridor Strategy	✓	This direction does not apply to the subject land.
5.10 Implementation of Regional Plans This direction applies when a relevant planning authority prepares a planning proposal.	-	Not applicable to the current planning proposal.
6. Local Plan Making		
6.1 Approval and Referral Requirements	✓	The proposal is consistent with the direction. The proposal does not trigger the need for any additional concurrence, consultation or referral to a Minister or Public Authority.
6.2 Reserving Land for Public Purposes	-	The proposal does not seek to reduce any land that is zoned for public recreation purposes.
6.3 Site Specific Provisions	-	The proposal is not inconsistent with this direction.
7. Metropolitan Planning		
7.1 Implementation of A Plan for Growing Sydney	✓	<p>This proposal is consistent with the objectives and strategies of A Plan for Growing Sydney.</p> <p>The Proposal achieves the overall intent of the Plan and seeks to implement the achievement of its vision, land use strategy, policies, outcomes or actions.</p> <p>This Proposal seeks to facilitate development of this key parcel of land within Arndell Park which will encourage economic investment in this strategic centre, employment generation and delivery of new housing opportunities.</p>
7.2 Implementation of Greater Macarthur Land Release Investigation	-	This direction does not apply to land within the Blacktown Council.
7.3 Parramatta Road Corridor Urban Transformation Strategy	-	The site is not located on land subject to the Parramatta Road Corridor Urban Transformation Strategy.
7.4 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	-	The site is not located within the North West Priority Growth Area.
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure	-	The site is not located within this Growth Area.
7.6 Implementation of Wilton Priority Growth	-	The site is not located in the Wilton Priority Growth Area.

Area Interim Land Use and Infrastructure Implementation Plan		
7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor	-	This direction does not apply to land within the Blacktown Local Government Area.

ADEQUACY OF SERVICES AND INFRASTRUCTURE TO MEET DEMAND

Access to Services

As established previously in this report the site is well located to public transport that provides linkages to local and regional centres that provide a wide range of services for future residents.

Infrastructure

The subject lands and adjoining urban development enjoy access to the Sydney Water reticulated water and sewer networks. Further the site and adjacent lands are served by a full range of energy and telecommunication facilities as well as access to both regional and local road networks.

There are currently no known capacity constraints relating to those local services and infrastructure, however these will be further investigated as part of the future planning process.

Traffic Impacts

A traffic and parking assesment (see enclosed) has been carried out for the proposal in accordance with the Blacktown Development Control Plan 2015 and State Environmental Planning Policy (Housing for Serniors or People with a Disability) 2004. This has revealed there is a requirement for 652 car parking spaces. The prelininary concept designs show there is sufficient area for basement level car parking with access possible from Penny Lane and other internal roads from within the Blacktown Workers Sports Club site.

A detailed traffic impact analysis has demonstrated that the full development will result in minimal increases in delays for the wider network. Noting that an upgrade is proposed to Reservoir Road with traffic signals and pedestrian facilities. With the proposed upgrades, the resultant traffic impacts are considered to be acceptable.

SUITABILITY OF SITE FOR DEVELOPMENT OF SENIORS HOUSING

Suitability of the site for Seniors Housing type development is clearly a critical consideration prior to the issue of a Site Compatibility Certificate. This suitability is primarily determined from a joint analysis of natural and built environment consideration and within the context of key the strategic planning directions.

The strategic planning framework clearly calls for the provision of new and diverse housing opportunities in existing urban areas that enjoy good accessibility to public transport, community and local retail facilities. The analysis undertaken at Section 2 of this report reveals that the subject site possesses those qualities.

It also reveals that urban conversion of the subject land could be readily absorbed into the existing urban environment as it would represent a simple and small extension of the existing urban footprint.

Council own urban growth manages strategies also clearly identify a need for significant new and diverse housing opportunities to cater for increasing demands of an increasingly ageing community.

These strategies also identify the need to provide this housing in fringe locations across the LGA, as opposed to the more problematic outcome of concentrating all denser housing in town centre locations. The proposed development clearly achieves this identified strategic outcome.

Accordingly, so long as natural and built environment constraints are recognised and responded to as part of future planning and development, a compelling case for development of the site for seniors housing exists.

SITE COMPATIBILITY CRITERIA

The below provides a discussion against the matters identified under Clause 25(5)(b) of the SEPP.

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.

The site is not identified as containing any significant environmental values, resources, or hazards in the location of the proposed development.

The proposal removes a small number of trees to facilitate the development however the large areas of trees across the broader site are retained. This is address in the Flora and Fauna Assessment. Therefore, the proposal is suitable when having regard to impacts on the natural environment.

A detailed site investigation has been undertaken which reveals there are some areas where landfill has occurred, and the material has contained asbestos. This application is submitted with both a remediation action plan as we as an asbestos management plan which both demonstrate the site is capable of being made suitable for residential development.

The impact that the proposed development is likely to have on the uses that are likely to be the future uses of the land in the vicinity of the development.

Future uses in the locality are unlikely to change as compared to existing uses given the zoning that applies to the locality and the fact the locality is not identified for future changes in land use through Council studies or strategies.

A social infrastructure assessment has been proposed for seniors housing development at the site and is also included with this submission. The social infrastructure report was prepared for the previous SCC application which also included a child care centre which is no longer proposed. However, the understanding of the infrastructure remains relevant to this revised proposal. The proposal has essentially been reduced in scale as such there are no changes to the principles established in the social infrastructure report.

The services and infrastructure that are or will be available to meet the demands arising from the development (particularly, retail, community, medical, and transport services having regard to the location and access requirements set out in clause 26 of the SEPP) and any proposed financial arrangements for infrastructure provision.

The site is near several local amenities including:

- pharmacy
- supermarkets
- parks
- walking and cycling tracks which provide access to the Western Sydney parklands.

There are also various community related facilities located within proximity to the site including:

- Blacktown Workers Sports Club
- sporting facilities
- hotel
- restaurant.

The site is ideally located with access to shopping, sporting and club facilities as well as local food outlets. The proposed Seniors Living Village is also ideally located adjacent to an existing residential area.

The subject site is within a 400m walking distance of several bus stops, located on Reservoir Road and Penny Place, which provide services to Blacktown Train Station, Westpoint Shopping and Centre bus interchange, as well as services in the other direction to Mount Druitt Station and Westfields.

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 or special uses in the vicinity of the development.

The site is zoned private recreation and the proposal will not impact on the function of the Blacktown Workers Sports Club. The Club has anticipated future development of the sports fields and already completed the relocation and improvement these facilities within the site. This has resulted in an increase in space on the club land that can be used for private recreation.

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.

The proposal has been developed after consideration of a series of site specific responses which has evolved into the scale of the proposed building envelopes that are appropriate for this development. The building form seeks to balance good urban design with the principles of amenity.

The proposal considers the controls for the site as there is no FSR and height control hence the built outcome was considered in relation to existing site conditions and the neighbouring environment, while also seeking to deliver an economically viable outcome for the Club.

The following techniques have been employed to address the principle urban design features of the site:

- Modulate the height and number of storeys across the site to provide visual variety and improve solar access to common open space
- Articulate buildings by height and individual form to signify address and masterplan boulevard entry
- Manipulate the built form to improve amenity and reduce visual bulk, by articulating the facades of buildings to reduce appearance of building mass and to increase through site vistas from outside and within
- Further breaking down these built forms to create a variety of facades, articulation, massing and architectural characters.

The resulting outcome is a development scheme which cohesively integrates with the surrounding development in terms of bulk, scale, built form and character.

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 (nb: this criteria does not apply to land in urban local government areas or urban zones listed under schedule 1 of the native vegetation act 2003).

The site is located on land that has previously been used for sports playing fields and as such native vegetation has virtually been cleared from the site. There are several trees that may need to be removed from the site to facilitate future development and an arborist report prepared by Australis Tree Management reveals that 38 trees can be retained within a future development scheme and 4 of these have high retention value. There are 24 trees to be removed to facilitate the proposed development.

A flora and fauna assessment report is included with this submission as prepared by Ecological Australia. The report concludes there are no threatened flora within the study area and the removal of Eucalyptus and Casuarina species will occur as part of the future development. However, these existing species are of low ecological constraint and not part of a native vegetation community as these species were planted as a landscape feature when the playing fields were established.

There are a range of mitigation measures to be implemented on the site to mitigate against the impacts which would be implemented at the development application stage.

CONCLUSION

The strategic planning framework clearly calls for the provision of new and diverse housing opportunities in existing urban areas that enjoy good accessibility to public transport, community and retail facilities. The analysis undertaken as part of this report reveals that the subject lands possess these qualities.

An assessment against key statutory and strategic considerations has also been undertaken as part of the report and reveals that the development concept satisfies the relevant SCC criteria and the various State and Local Government strategic documents and will deliver additional housing for seniors or people with a disability.

The site possesses important vegetation, drainage and landscape values and the proposal has been designed to ensure that these values are maintained.

Following a review of the relevant criteria, it is concluded that the proposed development is consistent with the objectives, planning strategies and detailed controls of these planning documents.

This site compatibility certificate does not grant development consent for the seniors living development, but rather provides a contextual assessment and certification that the future development of the site is appropriate for the site and compatible with the surrounding context. Following the issue of the SCC, a DA will be lodged with Blacktown Council seeking consent for the construction of detailed building forms within the parameters assessed and approved by the SCC

The application for a Site Compatibility Certificate is therefore submitted to the NSW Department of Planning and Environment for assessment. Think Planners recommends that a Site Compatibility Certificate be issued for the development.