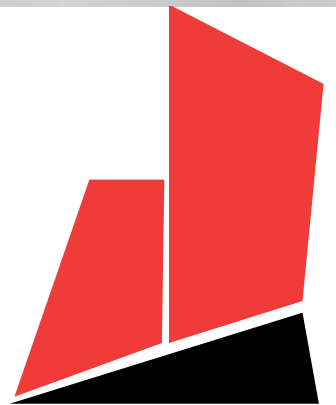


Site Compatibility Certificate for Serviced Self-Contained Dwellings

Bankstown Golf Club

70 Ashford Avenue, Milperra

23 September 2019



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PROJECT PARTICULARS

Project No. 2018136

Client Bankstown Golf Club

Site Address 70 Ashford Avenue, Milperra

Date	Document Name	Authorisation	
		Name/Position	Signature
1 September 2019	Report001_SCC_V1	Kristy Hodgkinson <i>Director</i>	
23 September 2019	Report001_SCC_V2	Kristy Hodgkinson <i>Director</i>	

In the event that this document is not signed, this is not representative of a final version of the document, suitable for assessment purposes.

RELIANCE ON CONSULTANT INFORMATION

As part of undertaking this project, Hamptons has relied on the professional advice provided by third party consultants. No responsibility is taken for the accuracy of the information relied upon by these consultants assisting the project. It is assumed that each of the consultants has made their own enquiries in relation to technical matters forming part of their expertise.



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Appendix 4	Arboriculture Impact Assessment
Appendix 5	Traffic Impact Assessment
Appendix 6	Bushfire Impact Assessment
Appendix 7	Stormwater Impact Assessment
Appendix 8	Bus timetables



1. INTRODUCTION

Hamptons Property Services (Hamptons) has been retained by the property owner, Bankstown Golf Club (the Applicant), in relation to the land known as 70 Ashford Avenue, Milperra (the site). The purpose of this application is to seek a Site Compatibility Certificate (SCC) on land that contains an existing registered club, in accordance with State Environmental Planning Policy (Housing for Seniors & People with a Disability) 2004 (the Seniors SEPP).

This SCC application is made to the NSW Department of Planning, Industry and Environment (DPIE) and will be determined by the Sydney South Planning Panel (SSPP). The site is, however, located in the Canterbury-Bankstown Local Government Area.

The purpose of the SCC is to establish the suitability of the land for the intended purpose, in this case, a **serviced self-care housing**, comprising independent living units (ILUs), which would be provided with access to meals, cleaning services, personal care, nursing care on site. Detailed design of each of the ILU's would occur at the development application stage; however, the purpose of the SCC is to establish that, based on general principles pertaining to character, compatibility and overall design principles, the subject site is suitable for the intended purpose.

Objectives of the SCC

The objective of SCC for the site as a whole is to provide an integrated land use outcome which includes retention of the existing 18-hole golf course, establishment of a new clubhouse and associated member facilities; a new swimming centre (recreational facility (indoor)) for general public use and approximately 149 independent living units (ILUs) availed of on-site services. It will also include basement car parking to service all aspects of the development, as well as expansive common open space areas and landscaping to service the development.

Project Team

This SCC application has been prepared in conjunction with the consultant team as set out below.

Table 1: Project Consultant Team

Discipline	Consultant
Urban Design	PTW Architects
Architecture	Altis Architects
Survey	LTS Lockley Surveyors
Flooding	Warren Smith & Partners
Bushfire	Travers Bushfire & Ecology
Traffic	Varga Traffic Planning



2. SITE AND CONTEXT ANALYSIS

Details of the site and its surrounding context are provided below.

Site Particulars

The site is located at 70 Ashford Avenue and is legally described as Lot 13 in Deposited Plan 584447 and Lot 612 Deposited Plan 837981 (the golf course site).

Figure 1: Aerial photograph of subject site, located at 70 Asford Avenue, Milperra (Source: www.maps.six.nsw.gov.au)



The golf course site has a total area of 46.844 hectares.

The Section 10.7 Certificate for the golf course site highlights the key technical matters which are set out below.

Table 2: Section 10.7 Certificate

Zoning	RE2 Private Recreation
Heritage Item	No
Conservation Area	No
Coastal Protection	No
Mine Subsidence	No
Road Widening or Realignment	No
Hazard Risk Restriction	No
Flood Planning	Yes
Threatened Species	<i>Acacia Pubescens</i> – Schedule 2 of the Threatened Species Conservation Act. Consultation with NPWS required where activity will result in the Pick of threatened plant species. Note that the site does not contain any such species as identified in the Arborist Report.
Acquisition	No
Biodiversity Certified Land	No
Bushfire Prone Land	No
Property Vegetation Plan	No

Contamination	No
ANEF	Affected by aircraft noise between the 20 and 25 ANEF levels

For the purpose of this SCC application, the portion of the golf course site to be redeveloped is generally limited to the eastern section of the land, which generally comprises Lot 612 Deposited Plan 837981; there is, however, a minor encroachment over Lot 13. This is identified as the development site in the below figure and herein referred to as *the site* for the remainder of this report for ease of reference.

Figure 2: The Development Site as highlighted in purple (Source: Altis Architects)



In terms of Lot 612, entry to the allotment (and the site as a whole) is from Ashford Avenue, *via* an existing driveway which is 12.07 m wide. This has a general fall of approximately 1.5 m into the car parking area, , which is located on the eastern side of the allotment.

An existing stormwater pipe aligns the eastern property boundary which is 87.33 m. The pipe then turns on a 90° angle and aligns the northern boundary of the development site, which is 103.91 m in length. An existing steel post fence aligns this boundary.

An existing gravel, unformed road, is also located adjacent the southern site boundary, providing access to the site from Bullecourt Lane, which extends from Bullecourt Road. The length of the southern boundary from Ashford Avenue to this point with Bullecourt Lane is 199.86 m.

Photograph 1: Existing driveway entry from Ashford Avenue, to car park, demonstrating existing vegetation aligning the southern site boundary



Photograph 2: Existing condition of Bullecourt Lane, looking west towards Bullecourt Road



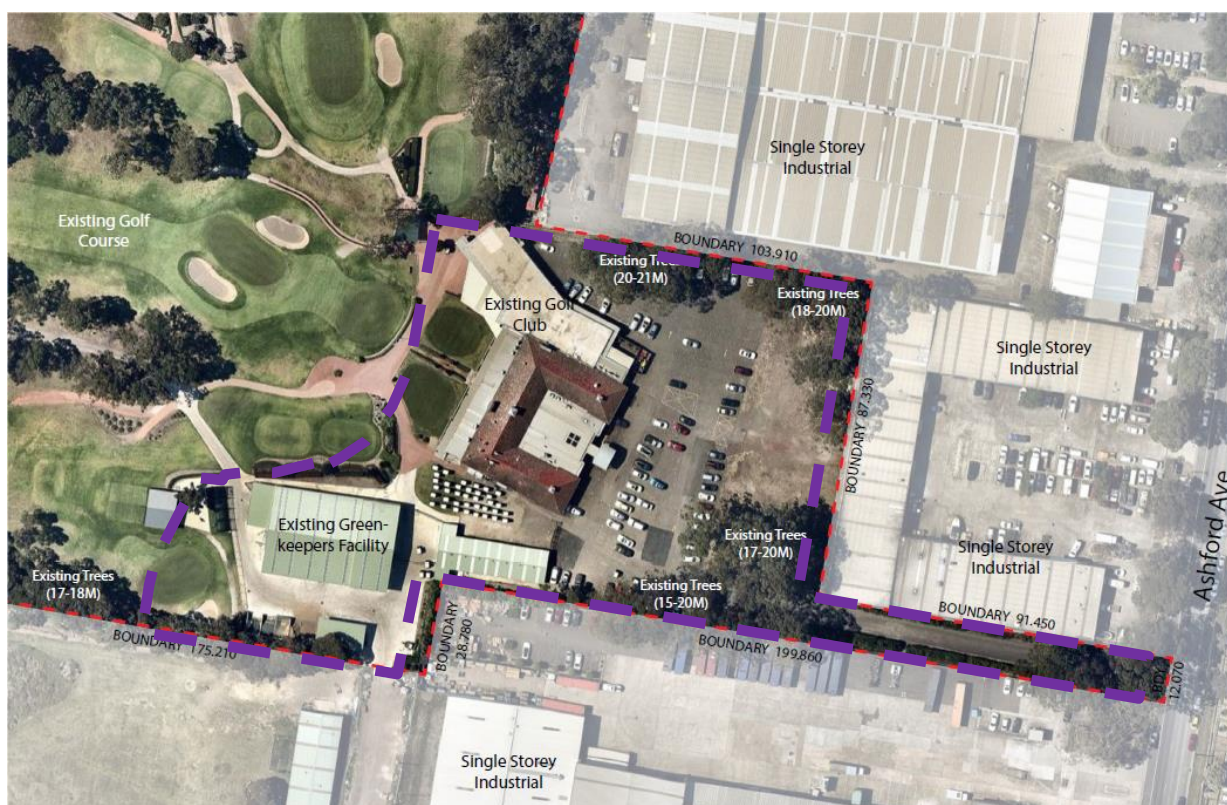
There is a large quantum of existing mature trees located around the northern, eastern and southern property boundaries which have been assessed for their safe useful like expectancy (SULE) and impact on the development outcomes.



Figure 3: Example of existing vegetation in north-eastern corner of the site

In terms of built structures, the site is occupied by an existing club house, located towards the western side of Lot 612, where the club house is generally accessible from the car parking area and opens to the golf course. To the south-west of the club house are two sheds, either side of the driveway entrance. Both of the structures are constructed of metal, with the one on the western side of the driveway accommodating the principal maintenance facility for the site.

Figure 4: Existing site plan showing built form and structures which currently form part of the registered club (Source: Altis Architects)



The golf course proper is located to the north and west of the club house and maintenance facilities and includes a practice bunker, a practice green, practice nets and the 18-hole course itself.

The car parking area is located to the east of the clubhouse and contains approximately 180 informal car parking spaces. On the southern side of the car parking area is also a 'Return and Earn' station.

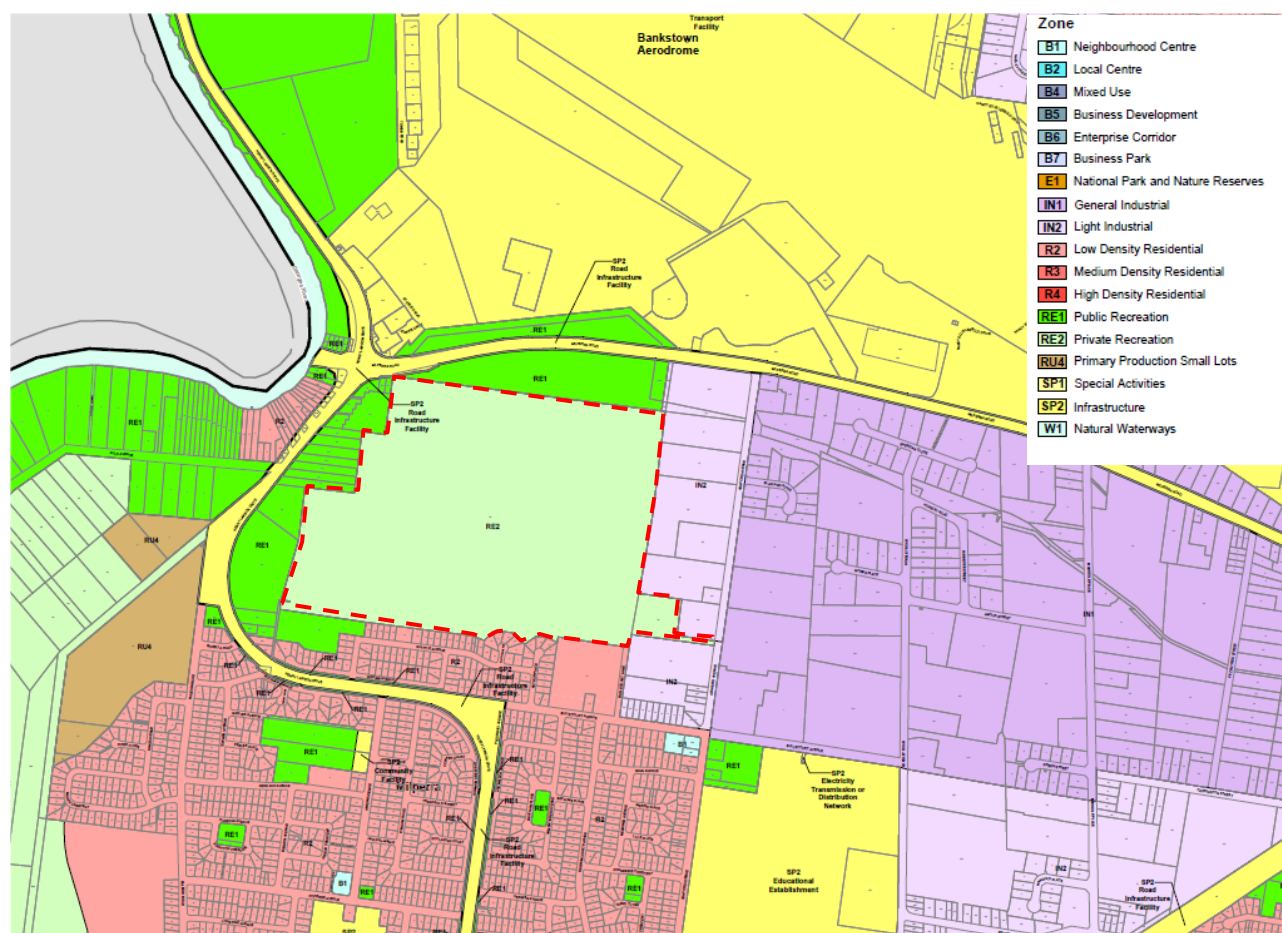
The club house is the oldest building on the site, with the maintenance facilities having been constructed in more recent times.

There is an array of easements which traverse Lot 13 for drainage purposes, as well as an easement for batter in the south-western corner of the golf course. There is also a right of way from Henry Lawson Drive which enables access to the western side of the site and a Right of Carriageway which burdens lot 612 and benefits Lot 13. The title certificates may be found at Appendix 1 and the Site Survey at Appendix 2.

Context Surrounding the Site

The extract of the Bankstown Local Environmental Plan 2011 (the LEP) demonstrates the extent of varying uses that are within the vicinity of the site.

Figure 5: Land Zoning Map demonstrating the different land uses within the immediate vicinity of the site



As evidenced above, land directly north of the site is zoned for public recreation purposes, before interfacing with Hume Highway; beyond this is the Bankstown Aerodrome. Directly east of the site, on the same side of

Ashford Avenue as the site, the land is zoned IN2 and generally for light industrial purposes, whereas the eastern side of Ashford Avenue transitions to heavier industrial land (General Industrial).

To the south-west of the site is the intersection of Bullecourt Road and Ashford Avenue, where the intersecting uses including heavy industrial, recreational, educational and low scale retail uses.

To the south of the site the land is zoned R2 Low Density Residential Use, with the block immediately adjoining the southern boundary currently vacant. This is currently subject to a development application which is under assessment for independent living units and a residential care facility.

To the west of the site is land zoned for public recreational purposes, before adjoining Henry Lawson Drive, which provides access to the arterial road network, including the M5 Motorway. This connects with the M7 motorway approximately 15 kilometres from the subject site and provides regional access to Sydney's primary vehicular transport corridor.

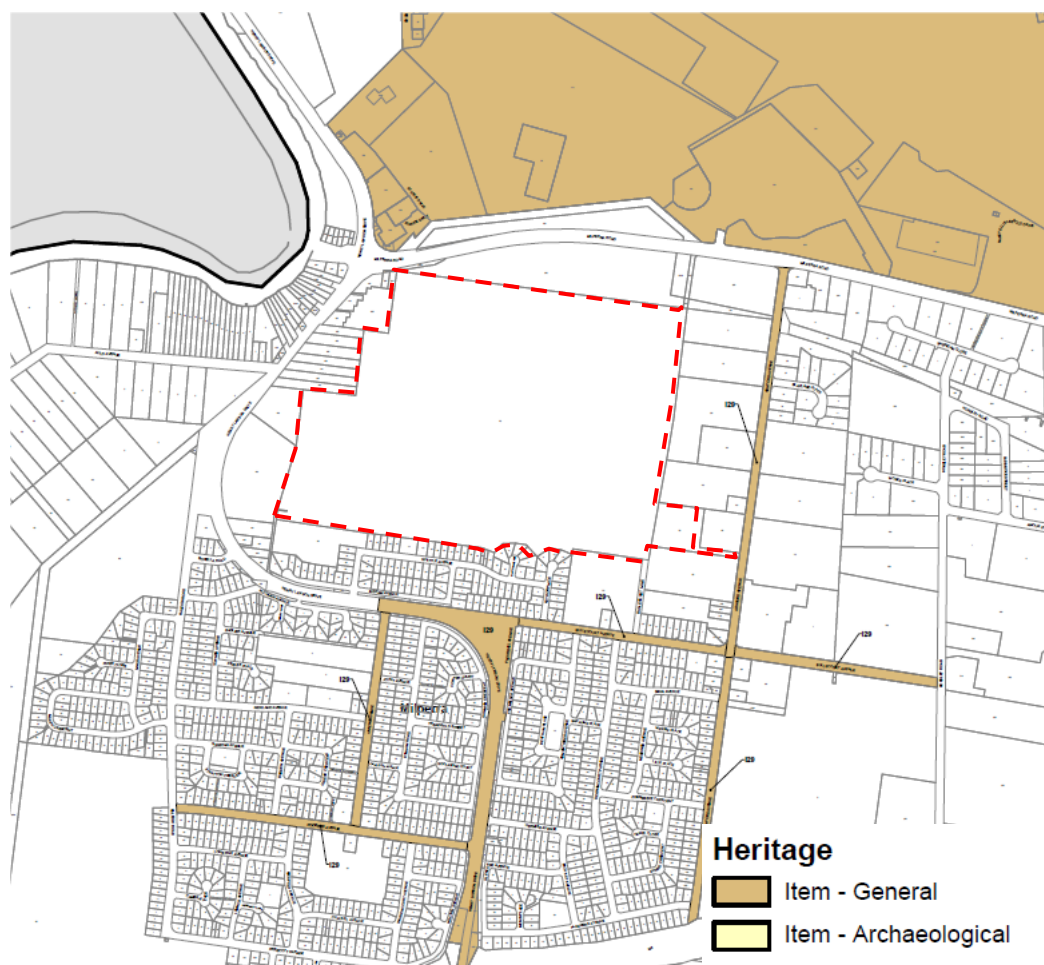
Figure 6: Regional and local road network within the vicinity of the site (Source: Altis Architects)



Heritage

The site is located in the vicinity of a heritage item, known as I29 on the accompanying map and is known as the former Milperra Soldier Settlement. The boundary of the item is defined by Ashford Avenue, Bullecourt Avenue and Fleurbaix Avenue.

Figure 7: Heritage Map demonstrating heritage items within the vicinity of the site



The heritage item, as the former settlement, is now only recognizable in terms of the road system. The proposed development will have no adverse consequence in that regard.

What is relevant is the social significance of the item as it relates to it reflecting a period in time where a specific social group was drawn together. The area was:

part of a national scheme that was intended to repatriate returning servicemen during and after World War I. It reflects then-current attitudes towards the appropriate ways to develop the country and ensure its growth and prosperity.

Figure 8: Feed store, a potato field and a typical settlers quarters contained within the Settlement



Source: <https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=1060223>

The intended use of the land provided for collective living arrangements for people in similar circumstances; the proposed use of this site will reinstate a similar ethos as previously attributable to the site.

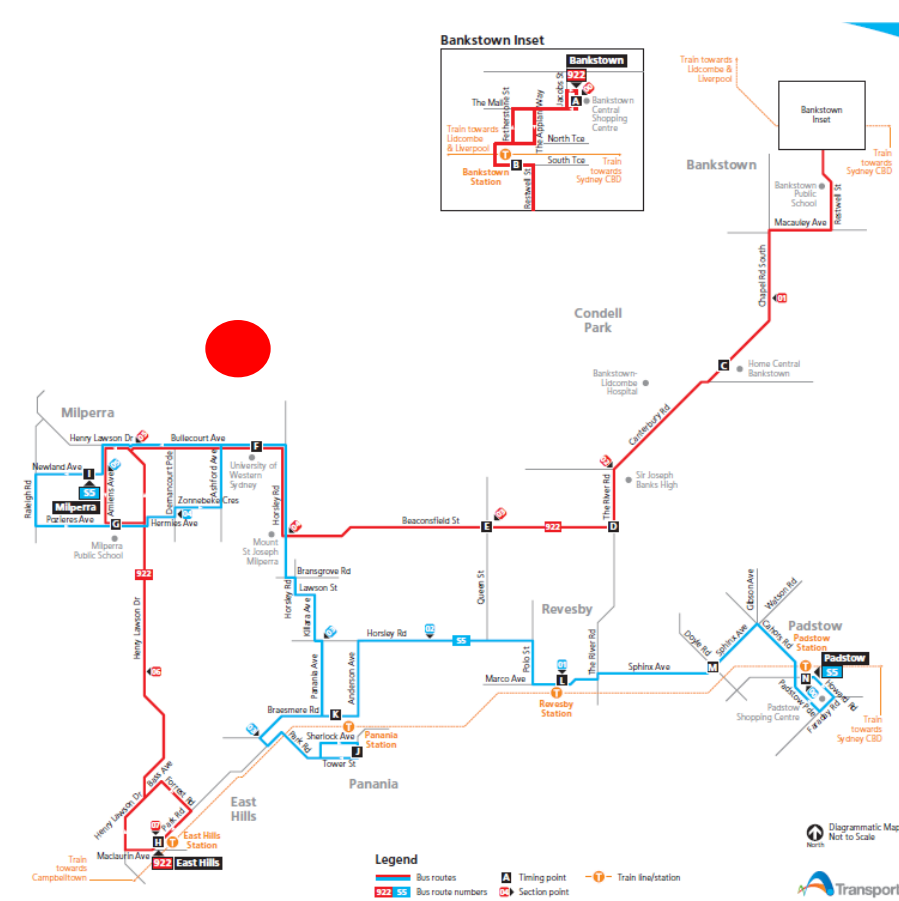
The site is also located within the vicinity of the heritage item known as Bankstown Aerodrome.

Proximity to Facilities & Services

One of the fundamental aspects to an SCC application is its accessibility to facilities and services. These are available within the vicinity of the site to ensure adequate access for future residents.

Basic retail facilities are located 250 m south of the site at the Milperra Shopping Village and Ashford Village, which include a pharmacy, mixed business which provides general and convenience grocery items and newsagent, as well as take away food outlets.

Further afield, such services are available at Milperra and Bankstown Centre which are accessible by bus.



A bus stop is located to the south of the site, just east of the intersection of Bullecourt Lane with Bullecourt Avenue, being just over 200 m from the site boundary. This is known as the S5 route and travels from Milperra Town Centre to Panania, Revesby and Padstow Railway Stations. A second route (922) travels from Milperra to Bankstown Central, located to the north east of the site.

Figure 9: S5 and 922 Bus Routes located within 400 metres of the subject site

There is also a bus stop located on Ashford Avenue, to the north of the driveway entry, being not less than 50m from the driveway entrance. This is serviced by the M90 bus route which goes from Burwood to Liverpool, and traverses Bankstown Centre.

Figure 10: M90 Bus Route located within 400m of the subject site

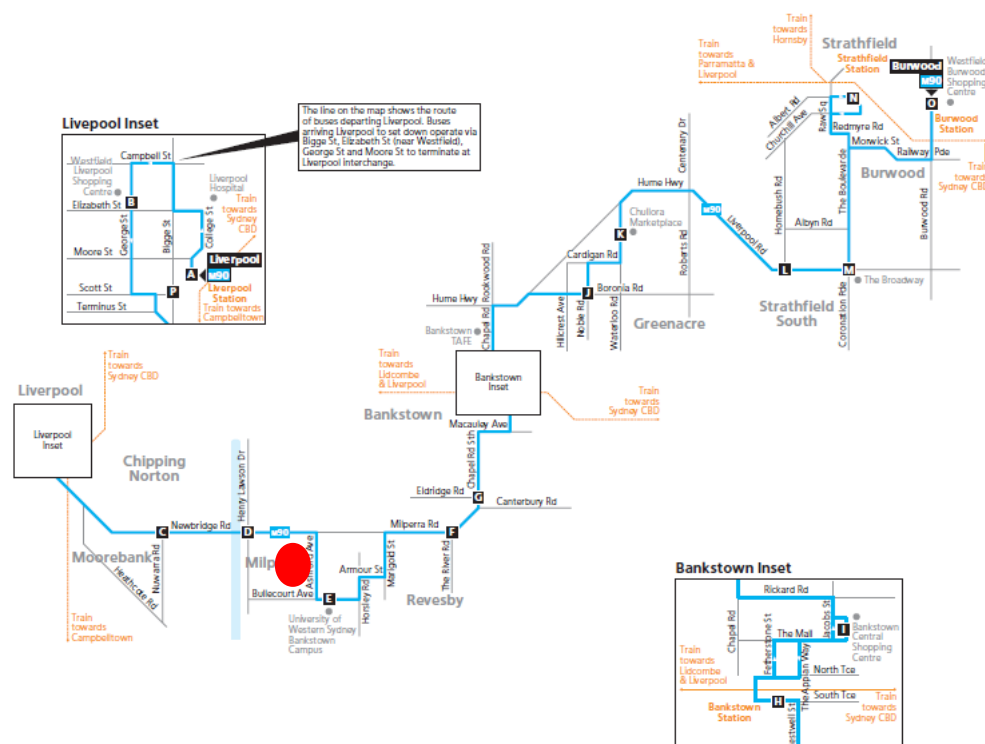


Figure 11: Ashford Avenue Medical Practice (Source: Altis Architects)

Ashford Avenue Medical Practice is located less than 400 m from the site, being located directly south of Ashford Village.

The bus stops in direct proximity also provide access to medical services further afield at Milperra and Bankstown Central and Liverpool.

Site Constraints

Flooding

Matters pertaining to flooding have been considered, determining that the site is not subject to the 1% AEP flooding level.

The western and southern perimeter of the site are partially affected (less than 250mm) by the PMF level. Further, the PMF construction level is likely the result of minor drainage and not flooding; as such, addressing the PMF level is considered unnecessary.

Most importantly, the site is not located in a high hazard flood area.



Figure 1 1% AEP Extract (Source: BMT WBM)

Figure 12: Flood prone designations (Source: Warren Smith & Partners) (note that the area for development purposes has been reduced)



Figure 2 PMF Extract (Source: BMT WBM)

Threatened Species

The Arborist Report demonstrates that the threatened species known as *Acacia Pubescens* is not located within that part of the site where works will take place; as such, this species will not be affected in association with this development.

Bushfire

The northern and western side of the golf course site is classified as Vegetation Category 1 and Vegetation Buffer; however, these are located some 400 m distance from that portion of the site to be developed.

Figure 13: Vegetation categories for bushfire protection purposes Source: Bushfire Impact Assessment, Travers Bushfire & Ecology



Figure 1.4 – Bushfire Prone Land Map
(source: Planning Portal, 2019)

Adequate asset protection zones must therefore be applied to the site to ensure adequate protection to future development.

Contamination

A detailed contamination assessment has not been prepared as part of the SCC. However, given the long term use of the land as a golf course, it is highly likely that there may be contaminants affecting the site, as a result of pesticide spraying and upkeep of the golf course.

A full assessment of soil quality would be undertaken as part of the development application stage to ensure that the land may be made suitable for the development purpose.

Water & Sewer

Water and sewer services are available to the site. Augmentation required as part of any future application would be undertaken in accordance with relevant conditions of development consent.

3. THE PROPOSAL

The SCC seeks to achieve building forms that are expressed between three and six storeys across the site, with an estimated yield of 149 ILUs, based on the current analysis and documentation. The number of ILUs is indicative only at this stage and the end sequence would be predicated on consideration of this application.

Of the 149 ILUs currently shown, it is proposed that there would be 16 x 1-Bed; 96 x 2-Bed and 37 x 3-Bed dwellings. The buildings will be divided into four separate forms, with 16 ILUs in Building A; 44 ILUs in Building B; 33 ILUs in Building C; and 56 ILUs in Building D.

In addition to the ILUs, the site would also accommodate the following:

- Replacement of the existing clubhouse with a new clubhouse facility, which would include a pro shop, amenities and storage areas for necessary equipment and maintenance facilities. This will also likely contain the residents services in accordance with the requirements for serviced self-contained housing
- A new learn to swim centre, located on the ground floor of the northern side of the site, to be available to the community, with an independent operator
- Basement car parking for each of the uses proposed on the site
- Designated drop off and pick up areas for the individual uses associated with the site
- Extensive landscaping and common open space works surrounding the built form.

The existing 18-hole golf course would be retained.

To improve the site's relationship with its broader context, it is intended that day-to-day access to and from the site will be *via* a new entry from Bullecourt Lane, to the west of the site, to provide a better level of presentation to the development, than the existing interface from the adjoining industrial area. This will then enable service vehicles to enter and leave the site through the existing Ashford Avenue egress point and ensure that service vehicles continue to dominant that frontage, with more localised traffic coming through Bullecourt Lane.

The built form would result in a floor space ratio of 1.25:1, based on a nominal site area of 17,045m², where the development will take place. The FSR when the whole of the golf course site is taken into consideration is 0.045:1.

The maximum building height is between three (3) and six (6) storeys; an approximate height of between 15.5 m and 21 m, including building services and lift overruns. The three-storey form is represented by Building A, adjacent the south-western corner of the site, with the highest forms behind this, through the eastern section of the site.



4. STRATEGIC PLANNING CONTEXT & JUSTIFICATION

Greater Sydney Region Plan

The site is subject to the strategic planning foundations which are sought to be delivered by the Greater Sydney Plan, designed to set a 40-year planning framework to manage growth and change in terms of economic, social and environmental matters. It is also designed to inform district and local planning provisions, as well as guide infrastructure agencies on how to deliver for growth and change.

The plan is based on several key principles which relate to:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

The future use of the land as intended, aligns with these principles and objectives is addressed below, as it relates to this SCC application.

Infrastructure and collaboration

Changes in technology mean that car parking within the development can be accommodated that allows for electric vehicle recharging.

The site is also highly accessible to public transport which will enable continued use of existing infrastructure assets that service the site.

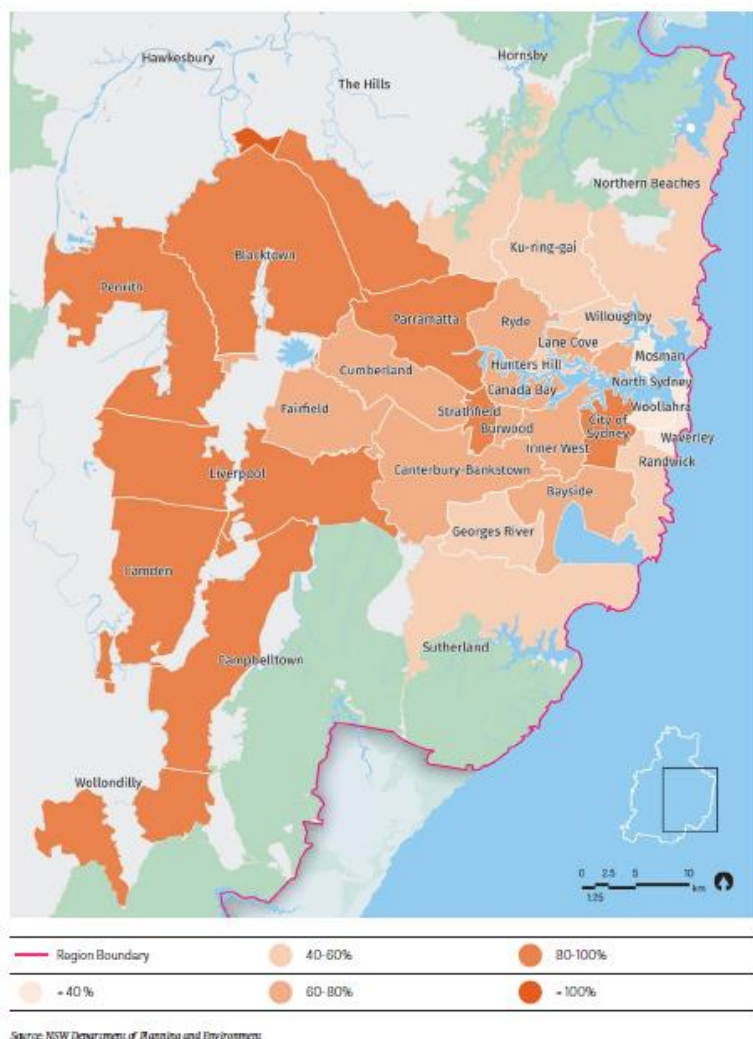
It is also relevant to note that the Priority Collaboration Areas include Bankstown Airport/Milperra industrial and urban services precinct is likely to include the subject site. While this has not progressed at this stage, the SCC process does not derogate from the intentions of the landholding, that would otherwise impact upon industrial land supply, nor employment.

Liveability

The below figure demonstrates the projected spatial pattern of population increase that will be over the age of 65 years between 2016 and 2036. In the case of the Canterbury/Bankstown LGA, this growth is anticipated to increase by between 60-80%. The areas of both Strathfield and Liverpool, which adjoin the Canterbury/Bankstown LGA have an even higher projected rate of 80-100%. With this concentration in growth occurring, there will be an increasing demand for health, social and aged care services than currently exists. The benefits of this development will ensure that demand for accommodation is aided with the additional provision of residential dwellings on this site in an area where the residential population aged over 65 is likely to increase over the next 20 years.



Further, the nature of development will aid the diversity of housing choice that is offered to the community.



The nature of the development will also accord with Objective 7 which seeks to ensure that communities are healthy, resilient and socially connected. The nature of the development allows for a strong social network to be established, not only by virtue of the community living within the development, but also as a result of the facilities offered on the site which again assist to establish and continue strong social networks.

The demand assessment prepared for this application demonstrates that there is a strong need for housing of this type, design and co-location of facilities due to the increase in the ageing population, consistent with servicing housing needs under the policy. This type of housing is also generally more affordable and allows for availability of more disposable income upon the sale of a primary residence.

Productivity

The productivity objectives are generally centred around the need to live and work within a 30-minute radius. The age cohort within developments such as this proposed is generally one where people are no longer working. However, the proposed development will not place pressure on existing infrastructure or services

that would compromise accessibility, nor will it impede the priority role of the road network servicing the industrial area.

Most importantly, additional development on this site will not deplete industrial landholdings which are deemed as important from both an industry and employment perspective, where industrial land is to be protected and managed. As the existing landholding is not used for such purpose, there will be no nett change as a result of this development.

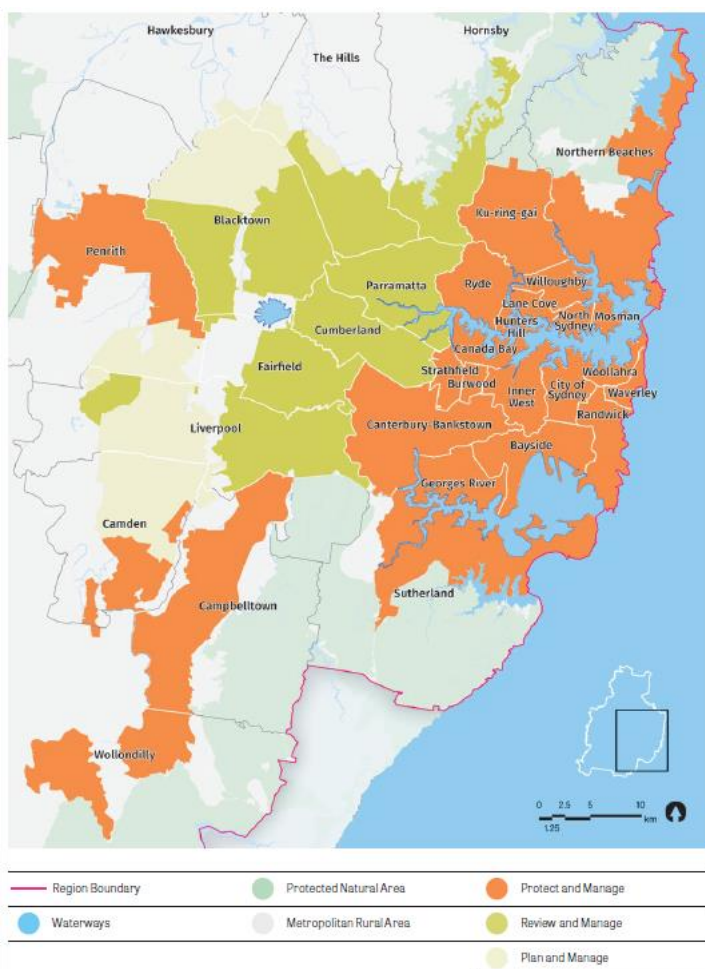


Figure 15: Industrial land approaches (Source: Draft Greater Sydney Plan 2017)

Implementation of the development will also result in local employment opportunities in association with all of the proposed uses within the development.

Sustainability

The principles of sustainability will be explored in more detail as part of the development application stage. However, fundamental to this will be:

- Compliance with BASIX requirements
- Water reuse strategies
- Implementation of solar panels
- Orientation of development to ensure that reliance on mechanical ventilation is reduced
- Provision of electric car charging points within the basement to embrace improved vehicle technology.

There will also be significant opportunities for additional planting across the site, not only to compensate for the extent of tree removal, but also to replace the extent of hard stand areas that currently comprise the site.

South District Plan

There are four objectives for Liveability under the South District Plan, which are:

- Providing services and social infrastructure to meet people's changing needs
- Fostering healthy, creative, culturally rich and socially connected communities
- Providing housing supply, choice and affordability with access to jobs and services
- Creating and renewing great places and local centres, and respecting the District's heritage

The proposed development will respond to changing needs of the intended community, as well as diversifying housing choice and affordability for incoming residents, with a range of one, two and three bedroom dwellings. It will also allow for people of similar ages to form their own social connections and activities in association with the development.

For Productivity, the main priority is S8 which is *Growing and investing in health and education precincts and Bankstown Airport trade gateway as economic catalysts for the District*. The site is located, in part, in the Bankstown Airport – Milperra Industrial Collaboration Area as shown below. The area is described as:

The airport site occupies 313 hectares and adjoins the Milperra industrial area, one of the most important centres of economic activity in the South District. Approximately 15,700 people work in the Milperra industrial area, with a third of jobs in manufacturing, including advanced manufacturing operations¹². Sectors of specialisation include aviation/aerospace and electronics. Advanced manufacturing is identified in Jobs for the Future as a priority globally tradeable segment which offers strong prospects for high-value and accelerated jobs growth and to develop globally competitive capability in skills and technology.

The Bankstown Airport Masterplan 2014 sets aside 130 hectares of land adjacent to Milperra for future development for non-aviation uses, with the aim of developing an industrial economic and employment hub. Together with the established Milperra industrial area, this area is well located with access to air transport, the road and rail freight network; the proposed Moorebank intermodal terminal; Liverpool; Bankstown; and the Liverpool health and education precinct. Public transport for workers could improve with the potential expansion of the Sydney Metro City & Southwest from Bankstown to Liverpool. Given the strategic opportunities associated with Bankstown Airport and Milperra industrial area, it has been identified as a Collaboration Area (refer to Figure 18). The Commission will work with Canterbury-Bankstown Council, the NSW Government, the Australian Government, Bankstown Airport Limited, industry and the community to develop a long-term economic strategy. This will: • improve transport connections to the broader District • integrate planning for the airport with planning of surrounding lands



- coordinate infrastructure delivery
- facilitate advanced manufacturing and innovation
- expand opportunities stemming from Western Sydney University Bankstown Campus and the University of NSW Aviation School



Figure 16: Bankstown Airport - Milperra Collaboration Area (Source: South District Plan)

Development on the subject site will not impede the growth of this area, nor will it deplete existing land supply for that purpose. Further, the focus for growth is on advanced manufacturing and innovation industries which will be less environmentally intrusive than more traditional industrial operations that are decreasing with technological improvements. Further, the design of the development ensures that potential impacts may be mitigated, particularly with the position and extent of screening through design elements that is proposed.

The proposal will not compromise the quantum of land that is available for economic and employment purposes in accordance with the Principles for managing industrial and urban land services and local employment opportunities will be increased through the proposed development's various activities.

With regard to Sustainability, opportunities will be available to enhance the existing site conditions, with further attributes to respond to the natural landscape.

Local Area Plan

The Local Area Plan for the Specialised Centre of Bankstown Airport – Milperra is yet to be prepared by the Council.

5. THE REQUIREMENTS OF THE SENIORS SEPP

Aims of the Policy

Clause 2 of the Seniors SEPP addresses the Aims of the Policy and requires the provision of housing that will:

- (a) increase the supply and diversity of residences that meets the needs of seniors or people with a disability*
- (b) make efficient use of existing infrastructure and services*
- (c) be of good design.*

The purpose of this SCC application is to ensure the provision of ILUs (approximately 149) of a diverse size and scale to meet the needs of seniors or people with a disability, in a location that is accessible in terms of infrastructure and services. The architectural design and urban form of the development will be of a high-quality architectural design outcome that is enhanced by the natural features of the site and capitalises on these through style, configuration, orientation and urban form.

Land to which the Policy applies

Clause 4 deals with Land to which this Policy applies. In accordance with clause 4(1), the site is *land that is land that adjoins land zoned primarily for urban purposes* and is *land being used for the purposes of an existing registered club*.

Does the land join land primarily zoned for urban purposes?

Yes. By reference to the zoning map attaching to the LEP (Figure 5), the subject site is zoned RE2 Private Recreation. To the immediate east of the site, the land is zoned IN2 Light Industrial and to the immediate south is zoned R2 Low Density Residential pursuant to the LEP. As such, the land adjoins land zoned for urban purposes.

Are dwelling houses, residential flat buildings, hospitals or special uses permitted in the adjoining urban purposes zone?

Yes. Dwelling houses and hospitals are permitted in the R2 zone.

Directly south of the site, aligning the boundary, but for a small portion towards the eastern end thereof, the land is zoned R2 Low Density Residential. As dwelling houses are permitted in the R2 Low Density Residential zone, in accordance with Clause 4(1)(a)(i), the land is evidently land adjoining land zoned for urban purposes.

Does the land contain an existing registered club?

Yes. A registered club is defined at clause 3, as *a club in respect of which a certificate of registration under the Registered Clubs Act 1976 is in force*. Pursuant to the Registered Clubs Act, a *certificate of registration* is no longer issued. Instead, the Registered Clubs Act provides that:



- 'Registered club' means a 'club that holds a club licence' and
- 'Club licence' means a club licence granted under the Liquor Act 2007.

The subject site holds a club licence under the Liquor Act 2007 which applies to the whole of the golf course site.

Therefore, as the Club holds a *club licence* that has been granted pursuant to the Liquor Act 2007 and it applies to the whole of the land known as 70 Ashford Avenue, Milperra, the site satisfies that part of clause 4 which requires that there is a registered club on the land.

Is the registered club an existing club?

An *existing registered club* is defined at clause 3, as *a registered club in existence on land immediately before the date on which State Environmental Planning Policy (Seniors Living 2004) (Amendment No. 2) commenced.*

The Club commenced trading more than 90 years ago and again meets the criteria of this clause.

Therefore, the site is used as an *existing registered club*, on *land adjoining land zoned for urban purposes* and on which *dwelling houses* and *hospitals* are permitted with development consent. Therefore, the site is *Land to which the policy applies.*

Is the land classified as being environmentally sensitive?

No. The site does not fall within the classification as being environmentally sensitive. In particular, the site is not located in a high flooding hazard, is not in a flood way and is not identified for conservation.

The land is not shown as cross-hatched on the bush fire evacuation risk map.

Therefore, the site is not *environmentally sensitive* and development for seniors housing under this Policy is permitted.

What is Seniors Housing?

Seniors housing is *residential accommodation that is, or is intended to be, used permanently for seniors people with a disability consisting of:*

- (a) *a residential care facility, or*
- (b) *a hostel, or*
- (c) *a group of self contained dwellings, or*
- (d) *a combination of these,*

but does not include a hospital.

In this case, it is proposed to provide a group of self-contained dwellings, which are defined as:



a dwelling or part of a building (other than a hostel), whether attached to another dwelling or not, housing seniors or people with a disability, where private facilities for significant cooking, sleeping and washing are included in the dwelling or part of the building, but where clothes washing or other facilities for use in connection with the dwelling or part of the building may be provided on a shared basis.

As the site is classified as *land adjoining land zoned for urban purposes*, for the development to be permissible, it must be *serviced self-care housing*, which is defined as:

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

Such development must be provided in conjunction with accommodation for people with a disability, in combination with a residential care facility, or as a retirement village. It is anticipated that the third aspect would apply. The detailed design stage, as part of the development application process would detail access to meals, cleaning services, personal and nursing care.

Development on land used for the purpose of an existing registered club

It is proposed that the existing registered club would operate in a new facility on the site and the existing golf course would be retained. For this to occur, at the development application stage, the consent authority must be satisfied that:

- a) the proposed development provides for appropriate measures to separate the club from the residential areas of the proposed development in order to avoid land use conflicts, and*
- b) an appropriate protocol will be in place for managing the relationship between the proposed development and the gambling facilities on the site of the club in order to minimise harm associated with the misuse and abuse of gambling activities by residents of the proposed development.*

The Applicant will be able to demonstrate these aspects as part of the development application process. The concept plans accompanying this application demonstrate that there are separate access points into the club facility to the residential component of the development.

Site Compatibility Certificates

What is an SCC?

A SCC is a certificate that is issued under the Seniors SEPP in accordance with clause 25.

When is an SCC required?

An SCC is required when development is proposed on land that adjoins land zoned for urban purposes or is used for an existing registered club. Both circumstances apply to this site.

Who issues an SCC?



An SCC is issued by the relevant Sydney district or regional planning panel.

When can an SCC be issued?

An SCC may only be issued where the relevant panel is satisfied that:

- (a) the site of the proposed development is suitable for more intensive development, and*
- (b) development for the purposes of seniors housing of the kind proposed in the development application is compatible with the surrounding environment having regard to (at least) the criteria specified in clause 25(5)(b).*

How is an application for an SCC made?

In this case, the application for an SCC is made by Hamptons Property Services Pty Ltd on behalf of the owner of the land.

This application is made in writing.

There are no previous SCCs pertaining to the site.

There are no known SCC applications issued, or applications made, but not determined, on proximate site land that the Applicant is aware of.

In the event that a cumulative impact study is required by the relevant panel, this would be supplied upon request.

What are the timeframes for an SCC?

Within 7 days of lodging an SCC application, the Planning Secretary must refer the application to Canterbury-Bankstown Council, whom have 21 days to provide comments. In addition, the SCC must be referred to the relevant Panel within 35 days of lodgement with the Planning Secretary.



6. SITE RELATED REQUIREMENTS

Clause 26-28 of the SEPP addresses those matters which must be considered to ensure that the site is suitably accessible, safe and can benefit from infrastructure services. These requirements and the proposal's response to these is set out below.

Table 3: Site -related requirements

Control	Comment	Compliance
26 Location and access to facilities		
1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to:	This clause does not apply at the SCC stage. However, for the benefit of demonstrating site suitability, it has been considered accordingly as part of the SCC application.	✓
(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and	<p>Services requirements are suitably available within the vicinity of the site to ensure adequate access for future residents.</p> <p>Basic retail facilities are located 250m south of the site at the Milperra Shopping Village and Ashford Village, which include a pharmacy, mixed business which provides general and convenience grocery items and newsagent, as well as take away food outlets.</p> <p>Vehicular access to the site can be obtained from Bullecourt Lane, onto Bullecourt Avenue.</p> <p>Access and egress is also provided to the site from Ashford Avenue.</p> <p>Further afield, such services are available at Milperra and Bankstown Central which are accessible by bus.</p> <p>A bus stop is located to the south of the site, just east of the intersection of Bullecourt Lane with Bullecourt Avenue, being just over 200m from the site boundary. This is known as the S5 route and travels from Milperra Town Centre to Panania,</p>	✓



	<p>Revesby and Padstow Railway Stations.</p> <p>A second route (922) travels from Milperra to Bankstown Central, located to the north east of the site.</p> <p>There is also a bus stop located on Ashford Avenue, to the north of the driveway entry, being not less than 50m from the driveway entrance. This is serviced by the M90 bus route which goes from Burwood to Liverpool, and traverses Bankstown Central.</p>	
(b) community services and recreation facilities, and	Community services and recreation facilities will be provided on-site. This will be provided in the form of the new club house facilities in association with the golf club that residents can avail of and utilize, along with the proposed swimming pool. In addition, on-site facilities such as a gym and recreational rooms will provided for the exclusive use of residents.	✓
(c) the practice of a general medical practitioner.	<p>Ashford Avenue Medical Practice is located less than 400 m from the site, being located directly south of Ashford Village.</p> <p>The bus stops in direct proximity provide access to medical services further afield at Milperra and Bankstown Central.</p>	✓
(2) Access complies with this clause if:		
(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable:	<p>It is anticipated that any application would require upgrade works be undertaken to the footpaths within the vicinity of the site that lead to the most proximate bus stops. Given that these services are already generally flat, these gradients would be achievable.</p> <p>Such matters may be detailed on any future conditions of development consent.</p>	✓



(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,		✓
(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,		✓
(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time, or		✓
(b) in the case of a proposed development on land in a local government area within the Greater Sydney (Greater Capital City Statistical Area)—there is a public transport service available to the residents who will occupy the proposed development:	The site is located in the Greater Sydney region.	✓
(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and		✓
(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and		✓
(iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive),		✓
(iv) and the gradient along the pathway from the site to the public transport services (and from the public transport services to the facilities and services referred to in subclause (1)) complies with subclause (3), or		✓
3) For the purposes of subclause (2) (b) and (c), the overall average gradient	Addressed above.	✓



along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable:		
(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,		
(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,		✓
(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time.		✓
(4) For the purposes of subclause (2):		
(a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and	Addressed above.	✓
(b) distances that are specified for the purposes of that subclause are to be measured by reference to the length of any such pathway.	Addressed above.	✓
27 Bush fire prone land		
1) A consent authority must not consent to a development application made pursuant to this Chapter to carry out development on land identified on a bush fire prone land map certified under section 10.3 of the Act as “Bush fire prone land—vegetation category 1”, “Bush fire prone land—vegetation category 2” or “Bush fire prone land—vegetation buffer” unless the consent authority is satisfied that the development complies with the requirements of the document titled Planning for Bush Fire Protection, ISBN 0 9751033 2 6, prepared by the NSW Rural Fire Service in co-operation with the Department of Planning, dated December 2006.	<p>The northern and western side of the site is classified as Vegetation Category 1 and Vegetation Buffer.</p> <p>The Bushfire Impact Assessment accompanying this application demonstrates that Planning for Bushfire Protection and the more recent 2018 version, can be complied with.</p> <p>Adequate asset protection zones are comfortably achieved.</p>	✓



28 Water and sewer		
1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that the housing will be connected to a reticulated water system and have adequate facilities for the removal or disposal of sewage.	These aspects will be achieved.	✓
2) If the water and sewerage services referred to in subclause (1) will be provided by a person other than the consent authority, the consent authority must consider the suitability of the site with regard to the availability of reticulated water and sewerage infrastructure. In locations where reticulated services cannot be made available, the consent authority must satisfy all relevant regulators that the provision of water and sewerage infrastructure, including environmental and operational considerations, are satisfactory for the proposed development.	Reticulated services access is available.	✓



7. DESIGN REQUIREMENTS FOR DEVELOPMENT

Part 3 of the Seniors SEPP provides detailed requirements that must be considered when designing such development. This includes a detailed site analysis to demonstrate the site constraints and opportunities, as well as design principles. These matters are set out below and addressed accordingly.

Table 4: Design Related Requirements

30 Site analysis		
1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied that the applicant has taken into account a site analysis prepared by the applicant in accordance with this clause.	A Site Analysis has been prepared by Altis Architects and PTW.	✓
2) A site analysis must:		
(a) contain information about the site and its surrounds as described in subclauses (3) and (4), and	Refer to Site Analysis, prepared by Altis Architects and PTW.	✓
(b) be accompanied by a written statement (supported by plans including drawings of sections and elevations and, in the case of proposed development on land adjoining land zoned primarily for urban purposes, an aerial photograph of the site):	Refer to Site Analysis, prepared by Altis Architects and PTW.	✓
(i) explaining how the design of the proposed development has regard to the site analysis, and	The fundamental physical constraints that derive the design of the built form are rendered in the following: <ul style="list-style-type: none"> ○ Asset protection zones required for bushfire protection purposes ○ Retention of existing trees ○ Location of stormwater drainage systems, tanks and pits ○ Site access ○ Surrounding land uses of an industrial nature ○ Ensuring cohesive relationships between the intended land uses on the site. 	✓
(ii) explaining how the design of the proposed development has regard to the design principles set out in Division 2.	These matters are addressed below.	✓
3) The following information about a site is to be identified in a site analysis:		

<p>(a) Site dimensions:</p> <ul style="list-style-type: none"> ○ length ○ width 	Refer to Site Analysis, prepared by Altis Architects and PTW.	✓
<p>(b) Topography:</p> <ul style="list-style-type: none"> ○ spot levels and/or contour ○ north point ○ natural drainage ○ any contaminated soils or filled areas 	<p>Refer to Site Survey</p> <p>Detailed matters pertaining to contamination would be addressed at the development application stage. It is, however, acknowledged that a contamination assessment would be required in association with any future application. Remediation works may be required given the use of the land which has involved chemical spraying etc., in association with the upkeep of the golf course, as well as the adjoining land uses, for industrial purposes, where contamination issues may have derived over time from the adjoining land uses.</p>	✓
<p>(c) Services:</p> <ul style="list-style-type: none"> ○ easements ○ connections for drainage and utility services 	<p>Details regarding the location of services are annotated on the stormwater plans.</p> <p>Easements affecting the properties are also provided on the title certificate and deposited plan. These generally relate to drainage; rights of carriageway; batters and supports.</p>	✓
<p>(d) Existing vegetation:</p> <ul style="list-style-type: none"> ○ location ○ height ○ spread of established trees ○ species 	Refer to Arborist Report	✓
<p>(e) Micro climates:</p> <ul style="list-style-type: none"> ○ orientation ○ prevailing winds 	Refer to Site Analysis, prepared by Altis Architects and PTW.	✓
<p>(f) Location of:</p> <ul style="list-style-type: none"> ○ buildings and other structures ○ heritage features and items including archaeology ○ fences ○ property boundaries ○ pedestrian and vehicle access 	Refer to Site Analysis, prepared by Altis Architects and PTW.	✓



(g) Views to and from the site	Refer to Site Analysis, prepared by Altis Architects and PTW, as well as the visual analysis at Section 6 of the Urban Design Report which also provide numerous angles of the context of surrounding development.	✓
(h) Overshadowing by neighbouring structures	Refer to Section 7 of the Urban Design Report	✓
4) The following information about the surrounds of a site is to be identified in a site analysis:		
(a) Neighbouring buildings: <ul style="list-style-type: none"> ○ location ○ height ○ use ○ balconies on adjacent properties ○ pedestrian and vehicle access to adjacent properties 	Buildings surrounding the subject site are industrial to the north, east and directly south. The land to the south is also underutilized in part, but is currently subject to a development application in accordance with the Seniors SEPP. Development further to the south-west interfaces with the golf course but not with the intended development. This is of a low-density residential context.	✓
(b) Privacy: <ul style="list-style-type: none"> ○ adjoining private open spaces ○ living room windows overlooking site ○ location of any facing doors and/or windows 	There are no interfaces from adjoining buildings that directly overlook that section of the site where the development will take place. The only immediate interface is the open car parking area which is adjacent the Ashford Avenue driveway. The proposed built form instead, turns its back to this interface such that the privacy of dwellings may be maintained, or screened accordingly.	✓
(c) Walls built to the site's boundary: <ul style="list-style-type: none"> ○ location ○ height ○ materials 	No walls are proposed to be built to the boundary. The built form relies on setbacks to ensure that there is adequate separation, given that residential development is proposed on the subject site, which is a more sensitive land use than those adjoining. The height of neighbouring buildings are generally two storeys in height;	✓



	<p>however, as industrial premises, the height and scale of these is in the order of 10+ metres, instead providing what appears as a three/four storey interface with the subject site. Particularly to the north and east of the site, the buildings are proximate to, if not on, the boundary with the subject site and provide a high degree of visual dominance to the subject site, even in its current form, as heavy brick, unarticulated structures.</p> <p>In identifying this as a constraint to positioning built form on the subject site, the appropriate opportunity exists for development on the subject site to turn its back on this interface and maximise the benefits of the orientation towards the open space that is provided by the golf course, as well as the north and western orientation to maximise amenity into the development.</p>	
(d) Difference in levels between the site and adjacent properties at their boundaries	Refer to Site Survey.	✓
(e) Views and solar access enjoyed by neighbouring properties	<p>Matters of solar access are addressed in Section 5 of the UDR.</p> <p>There are no significant view corridors within the vicinity of the site that would be impeded by the built form as sought.</p> <p>Further, the design of the built form ensures that views towards the golf course are capitalized on.</p>	✓
(f) Major trees on adjacent properties	There are no major trees on adjoining properties that would be impacted by this proposal.	✓
(g) Street frontage features: <ul style="list-style-type: none"> ○ poles ○ trees ○ kerb crossovers ○ bus stops ○ other services 	Refer to Site Survey	✓

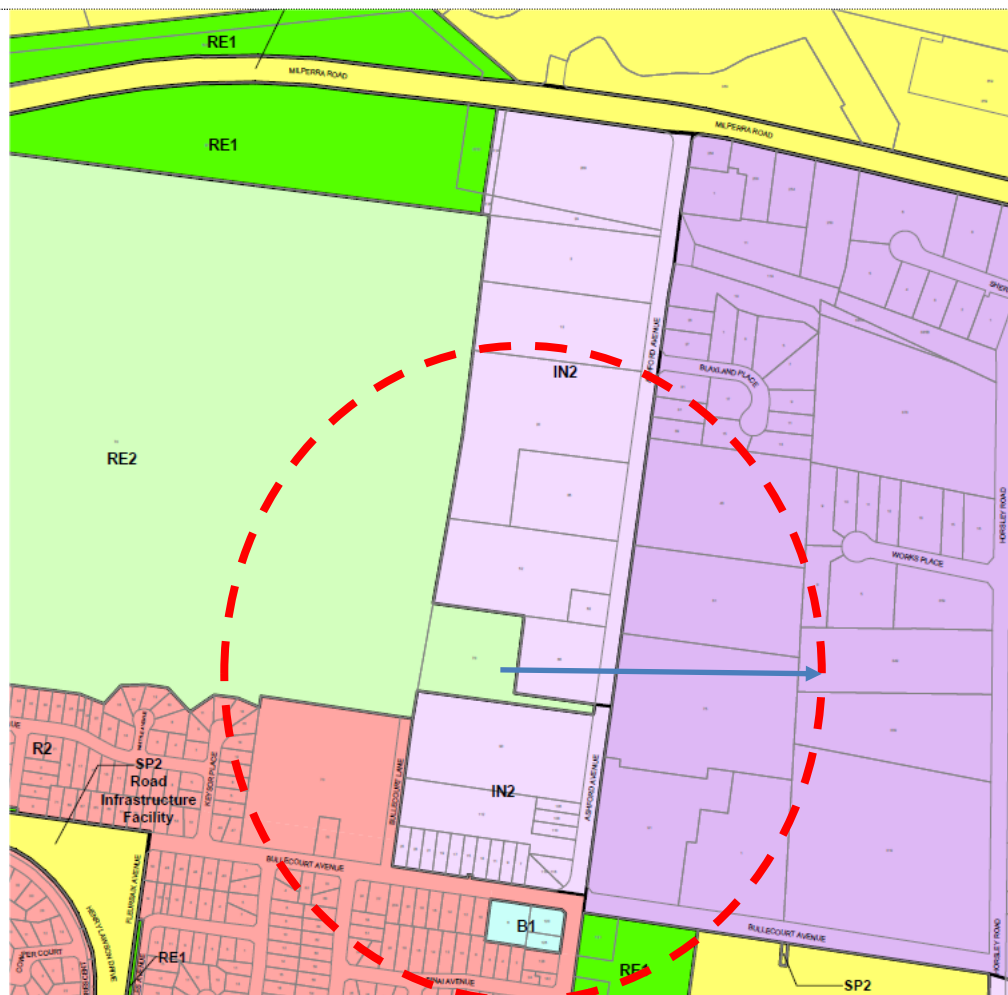


<p>(h) The built form and character of adjacent development (including buildings opposite on both sides of the street(s) fronted):</p> <ul style="list-style-type: none"> ○ architectural character ○ front fencing ○ garden styles 	<p>Refer to Site Survey and photographs at Section 2 of the UDR.</p>	<p>Yes</p>
<p>(i) Heritage features of surrounding locality and landscape</p>	<p>The site is located in the vicinity of a heritage item, known as I29 on the accompanying map. This is known as the former Milperra Soldier Settlement and is defined by Ashford Avenue, Bullecourt Avenue and Fleurbaix Avenue.</p> <p>The heritage item, as the former settlement, is now only recognizable in terms of the road system. The proposed development will have no adverse consequence in that regard.</p> <p>What is relevant is the social significance of the item as it relates to it reflecting a period in time where a specific social group was drawn together. The area was <i>part of a national scheme that was intended to repatriate returning servicemen during and after World War I. It reflects then-current attitudes towards the appropriate ways to develop the country and ensure its growth and prosperity.</i></p> <p>The intended use of the land provided for collective living arrangements for people in similar circumstances; the proposed use of this site will reinstate a similar ethos as previously attributable to the site.</p>	<p>Yes</p>
<p>(j) Direction and distance to local facilities:</p> <ul style="list-style-type: none"> ○ local shops ○ schools ○ public transport ○ recreation and community facilities 	<p>This is addressed above.</p>	<p>✓</p>
<p>(k) Public open space:</p> <ul style="list-style-type: none"> ○ location ○ use 		<p>✓</p>



(l) Adjoining bushland or environmentally sensitive land	Refer to Site Analysis, prepared by Altis Architects and PTW.	✓
(m) Sources of nuisance: <ul style="list-style-type: none"> ○ flight paths ○ noisy roads or significant noise sources ○ polluting operations 	<p>The site is within the flight path of Bankstown Airport. Adequate noise mitigation measures would be factored into the design at the development application stage.</p> <p>The height of the proposed buildings will not impinge airspace utilized in association with Bankstown Airport. With respect to roads, the proposed development is set away from classified road within the vicinity of the site that may otherwise impact noise conditions.</p> <p>With respect to polluting operations within 300 m of the site, there is land zoned for both IN1 General Industrial and IN2 Light Industrial uses. The portion of the site where the development is located will immediately interface with lighter industrial operations which are inherently of a less polluting nature than land located in an IN1 General Industrial zone. While there is the potential for impact from heavier industrial uses further east of the site, the land to be developed is tucked within other broader land uses, which effectively assist to screen potential impacts.</p> <p>A similar co-hort of land uses interaction exists to the south of the site along Bullecourt Avenue, where heavier industrial land interfaces directly with residential development, as well as directly interfacing with light industrial development. The subject site will have a greater degree of screening and separation than other residential locations within the immediate vicinity.</p>	✓





(n) Adjoining land uses and activities (such as agricultural activities)		✓
32 Design of residential development		
A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied that the proposed development demonstrates that adequate regard has been given to the principles set out in Division 2.	Noted.	✓
33 Neighbourhood amenity and streetscape		
The proposed development should:		
(a) recognise the desirable elements of the location's current character (or, in the case of precincts undergoing a transition, where described in local planning controls, the desired future character) so that new buildings contribute to the quality and identity of the area, and	The desirable elements of the location's current character include: <ul style="list-style-type: none"> the ability to integrate a variety of land uses including retail/commercial, industrial and lower density residential development without adverse impact 	✓

	<ul style="list-style-type: none"> ○ the role that the natural landscape must play through existing vegetation, as well as the availability of private and public open space in the vicinity of the site ○ to capitalize on the proximity to public transport services by improving related infrastructure such as pedestrian pathways to enhance the experience of the locality. <p>The proposed use and associated design of the development will continue to ensure that the private open space areas derived on the site are maintained and enhanced in this location where there is a myriad of land uses. The golf course proper will continue to act as a separator to the industrial uses, both in a physical and visual sense to ensure that this desirable landscape element remains a key feature of this locality.</p>	
(b) retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity and any relevant heritage items that are identified in a local environmental plan, and	<p>As detailed above, the site is located in a heritage conservation area, being the former Milperra Soldier Settlement. The proposed development will not have any impact in terms of retaining the elements of this, which is largely derived by the street composition. However, the settlement was reflective of post-war living arrangements in a community network; the proposal will derive a similar outcome by establishing a community for the aged and/or disabled, creating a social linkage to the historical composition of this location. As such, the proposal will not compromise the physical characteristics and layout derived by</p>	✓



	the former settlement and will also provide a social linkage returning to the historical composition of living arrangements.	
(c) maintain reasonable neighbourhood amenity and appropriate residential character by:		
(i) providing building setbacks to reduce bulk and overshadowing, and	<p><u>Bulk</u></p> <p>The proposed development has taken the approach of utilising the ADG for the purpose of establishing appropriate building setbacks to site boundaries. Particularly in terms of the industrial land holdings to the north and east, while these building are intended for industrial use for the foreseeable future, the setbacks recognize a future opportunity for commercial or residential development, having had particular regard for these setback distances to enable adequate separation to avoid unnecessary visual bulk in the event of future redevelopment of these properties.</p> <p><u>Overshadowing</u></p> <p>With regard to overshadowing from the proposed development, and taking account of the future development of the Anglicare site, the proposed development will not adversely impact upon the proposed Building A on that site, which is at the direct interface. There would be a minor reduction in solar enjoyment caused by the Club building between 9am and 10am at the winter solstice; however, access to sunlight to this rear boundary is available from 11am, such that a greater quantum of solar access than that generally required in an urban context, is achieved despite the proposed development. This is achieved with the building setback of 12 m to the property boundary, which is consistent with the ADG</p>	✓



	requirements for built form up to four storeys in height.	
(ii) using building form and siting that relates to the site's land form, and	<p>The evolution of the urban design analysis for this project is demonstrated in Section 2 Urban Design Philosophy of the UDR.</p> <p>The site is relatively flat, as are the properties within the vicinity of the site.</p> <p>This has enabled a courtyard style approach that is consistent with building forms within the vicinity of the site, including those of an industrial nature.</p> <p>In utilising the courtyard opportunity that is presented from the flat land form has enabled the composition of buildings to maximise the opportunities towards both sunlight and view.</p> <p>This has also enabled the building forms to be separated within the development itself, by using the courtyard space to maximise the opening between buildings within the development and create a strong sense of landscape that overrides any dominant presence of built form. This internalized courtyard area then blends directly into the golf course proper, such that there is an overall visual linkage that is not obstructed by built form and siting.</p> <p>The siting of the buildings also ensures that the high value frontage, on the northern and western axis of the building is maximised as is the view, without compromising the vantage of neighbouring properties.</p> <p>The curvilinear building form is also sited to create a sense of flow in built form that is similar to the softness derived by the landscape character and principle use of the site as a golf course.</p>	✓



	Therefore, the form and siting of the buildings is highly responsive to the land form of the site.	
(iii) adopting building heights at the street frontage that are compatible in scale with adjacent development, and	<p>The subject site has a very limited composition with street frontages, with the development area being set well into the site, away from Ashford Avenue.</p> <p>Its main interface, in terms of street frontage is the site entrance on the southern side, from Bullecourt Lane. While the adjoining site to the south is currently vacant, it is the subject of a development application for a seniors living development. Not yet determined, the proximate building to the site is known as Building A. This is setback from the northern site boundary, at its closest point, by approximately 6 m and a building height of 7.35 m.</p> <p>The closet building composition within the site is the club house, and two storey composition of ILU's above which is located at that interface with the Anglicare's Building A. The built form is set back 12 m from the site boundary; in conjunction with the minimum setback of balconies on Building A of the adjoining site, an overall separation distance of 18 m is achieved.</p> <p>The separation distance between the two forms and the rounded composition of the building form, as proposed on the subject site, provides a sympathetic relationship in terms of scale and design that is not visually intrusive in the landscape, nor out of scale when viewed from surrounding vantage points.</p> <p>When entering the site from Bullecourt Lane, given the extent of future development along the western side of the Lane, and the inverted curve of the Club building, that form will not be visually</p>	✓



	dominant when one traverses this street frontage, with the development form only becoming visible as one gets closer to, and then moves into the site. The scale of the buildings moves along Bullecourt Lane and the height of Building A does not become prevalent until quite late in the visual experience from this street frontage.	
(iv) considering where buildings are located on the boundary, the impact of the boundary walls on neighbours, and	<p>The composition of built form on the subject site is directly responsive to the context of built form on the neighbouring industrial land, where buildings are proximate, if not almost on, the property boundary, such that these force built form on the subject site to be set back from these and turn their back to those neighbouring properties, due to the bland and unarticulated facades that present to the site. This is the composition of the northern and eastern boundaries.</p> <p>As such, the built form has been designed to orientate itself away from these less desirable interfaces.</p> <p>At the ground floor, the swimming pool is setback 1.5m from the property boundary; above the ground floor, the upper levels are set back 9 m from the boundary to ensure adequate built form separation, particularly in the event of future redevelopment.</p> <p>Similarly, to the eastern and southern interfaces, the building form is set back 12 m, again to ensure adequate separation.</p> <p>Aside from four apartments, located on the southern side, all ILUs are designed as cross-through apartments such that service areas and less habitable spaces can derive a position on the interface with industrial buildings and the habitable spaces within dwelling can appreciate</p>	✓



	<p>the more pleasant visual aspect of the site.</p> <p>The utilisation of the U-shaped design ensures that the industrial interface is limited through building orientation and design, such that the proposed development is not inhibited or impeded by the poor design outcomes of the surrounding industrial buildings as they interface with the subject site.</p>	
(d) be designed so that the front building of the development is set back in sympathy with, but not necessarily the same as, the existing building line, and	<p>As detailed previously, the site has a limited interface with the street frontage of Ashford Avenue, such that there is no prescriptive building line to the street frontage that warrants dictation of an informed building line where development on the subject site should be positioned.</p> <p>The ILUs are confined to that section of the site that aligns with the boundaries of the industrial land to the north and south and does not impede upon the private recreation area of the golf course. This is aside from the golf club building (Building A) which interfaces with the Anglicare site to the south and in particular, their proposed Building A.</p>	✓
(e) embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and	<p>Detailed landscape design will be provided at the development application stage. Tree removal will be required due to basement structures; however, all planting will be complementary to the extensive landscape experience that is currently derived from the existing golf course.</p>	✓
(f) retain, wherever reasonable, major existing trees, and	<p>This matter is addressed in the Arborist Report. While tree removal will be required due to basement structures, suitable replacement planting will be achieved that is complementary to the landscape characteristics of the site and its overall composition.</p> <p>This will be addressed at the development application stage.</p>	✓



(g) be designed so that no building is constructed in a riparian zone.		Not Applicable.
34 Visual and acoustic privacy		
The proposed development should consider the visual and acoustic privacy of neighbours in the vicinity and residents by:		
(a) appropriate site planning, the location and design of windows and balconies, the use of screening devices and landscaping, and	<p>Given the interface of the site to the north, east and south, careful site planning has been fundamental to a sound development outcome for this site.</p> <p>The orientation for all bar four dwellings is to the northern and western aspects of the site, such that they do not interface with outcomes that may otherwise compromise the visual or acoustic privacy of the proposed dwellings. Instead, by turning their back to these adjoining land uses, this provides an automatic design feature for screening purposes, which will be further enhanced with landscaping treatment to ensure that maximum privacy is achieved.</p> <p>Window openings and glazing treatment will be designed to further reinforce such aspects.</p>	✓
(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.	The layout of individual dwellings will be addressed at the development application stage; however, such constraints may be managed accordingly.	✓
35 Solar access and design for climate		
The proposed development should:		
(a) ensure adequate daylight to the main living areas of neighbours in the vicinity and residents and adequate sunlight to substantial areas of private open space, and	<p>This is achieved to neighbouring properties as set out previously.</p> <p>Within the development itself, the sun eye diagrams at Section 7 demonstrate that more than sufficient solar access is achieved within the development itself.</p>	✓
(b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation solar heating and lighting by locating the windows of	This will be achieved as part of the detailed design at the development application stage.	✓



living and dining areas in a northerly direction.		
36 Stormwater		
The proposed development should:		
(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and	Refer to Stormwater Concept Plan	✓
(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.	Refer to Stormwater Concept Plan	✓
37 Crime prevention		
The proposed development should provide personal property security for residents and visitors and encourage crime prevention by:		
(a) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins any such area, driveway or street, and	This will be provide as part of the development application stage, in conjunction with a CPTED assessment. However, the evident configuration of building forms demonstrate that there is sound opportunities for observation of public areas associated with the development.	✓
(b) where shared entries are required, providing shared entries that serve a small number of dwellings and that are able to be locked, and	The building forms have been designed into small segments with individual entries to a small number of dwellings and are lockable.	✓
(c) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.	This will be achieved as part of the detailed design at the development application stage.	✓
38 Accessibility		
The proposed development should:		
(a) have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities, and	The pedestrian links to and from the site, particularly to local facilities, services and transport will be clearly discernable.	✓
(b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.	New pedestrian connections will be established as well as clearly designated car parking areas for residents, the golfing community and visitors to the site.	✓



39 Waste management		
The proposed development should be provided with waste facilities that maximise recycling by the provision of appropriate facilities.	To be resolved at the development application stage.	✓
40 Development standards—minimum sizes and building height		
1) General A consent authority must not consent to a development application made pursuant to this Chapter unless the proposed development complies with the standards specified in this clause.		Noted.
2) Site size The size of the site must be at least 1,000 square metres.		✓
3) Site frontage The site frontage must be at least 20 metres wide measured at the building line.		✓
4) Height in zones where residential flat buildings are not permitted If the development is proposed in a residential zone where residential flat buildings are not permitted:	The site is located in the RE2 Recreation zone.	Not Applicable
(a) the height of all buildings in the proposed development must be 8 metres or less, and		Not Applicable
(b) a building that is adjacent to a boundary of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) must be not more than 2 storeys in height, and		Not Applicable
(c) a building located in the rear 25% area of the site must not exceed 1 storey in height.		Not Applicable
5) Development applications to which clause does not apply Subclauses (2), (3) and (4) (c) do not apply to a development application made by any of the following:		Not Applicable
(a) the Department of Housing,		
(b) any other social housing provider.		



41 Standards for hostels and self-contained dwellings		
1) A consent authority must not consent to a development application made pursuant to this Chapter to carry out development for the purpose of a hostel or self-contained dwelling unless the proposed development complies with the standards specified in Schedule 3 for such development.	Refer to Schedule 3 assessment.	✓
46 Inter-relationship of Part with design principles in Part 3		
1) Nothing in this Part permits the granting of consent to a development application made pursuant to this Chapter if the consent authority is satisfied that the proposed development does not demonstrate that adequate regard has been given to the principles set out in Division 2 of Part 3.	Adequate regard has been given to the principles set out in Division 2 of Part 3.	✓
2) For the avoidance of doubt, nothing in this Part limits the matters to which the relevant panel may have regard in refusing to issue a site compatibility certificate.		Noted
50 Standards that cannot be used to refuse development consent for self-contained dwellings		
A consent authority must not refuse consent to a development application made pursuant to this Chapter for the carrying out of development for the purpose of a self-contained dwelling (including in-fill self-care housing and serviced self-care housing) on any of the following grounds:		
(a) building height: if all proposed buildings are 8 metres or less in height (and regardless of any other standard specified by another environmental planning instrument limiting development to 2 storeys),	The proposed buildings exceed 8 m in height.	X
(b) density and scale: if the density and scale of the buildings when	The proposed density exceeds 0.5:1.	X



expressed as a floor space ratio is 0.5:1 or less,		
(c) landscaped area: if:		
(i) in the case of a development application made by a social housing provider—a minimum 35 square metres of landscaped area per dwelling is provided, or		Not Applicable.
(ii) in any other case—a minimum of 30% of the area of the site is to be landscaped,	If one limits the site area to the development site, 46% of the site is provided with landscaped area.	✓
(d) Deep soil zones: if, in relation to that part of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) that is not built on, paved or otherwise sealed, there is soil of a sufficient depth to support the growth of trees and shrubs on an area of not less than 15% of the area of the site (the deep soil zone). Two-thirds of the deep soil zone should preferably be located at the rear of the site and each area forming part of the zone should have a minimum dimension of 3 metres,	If one limits the site area to the development site, 15% of the site is provided with deep soil planting.	✓
(e) solar access: if living rooms and private open spaces for a minimum of 70% of the dwellings of the development receive a minimum of 3 hours direct sunlight between 9am and 3pm in mid-winter,	The sun access diagrams and orientation of built form demonstrate that this will be achievable. Further information would be provided at the development application stage.	✓
(f) private open space for in-fill self-care housing: if:		
(i) in the case of a single storey dwelling or a dwelling that is located, wholly or in part, on the ground floor of a multi-storey building, not less than 15 square metres of private open space per dwelling is provided and, of this open space, one area is not less than		Not Applicable



3 metres wide and 3 metres long and is accessible from a living area located on the ground floor, and		
(ii) in the case of any other dwelling, there is a balcony with an area of not less than 10 square metres (or 6 square metres for a 1 bedroom dwelling), that is not less than 2 metres in either length or depth and that is accessible from a living area,	This will be achieved and demonstrated at the development application stage.	✓
(h) parking: if at least the following is provided:		
(i) 0.5 car spaces for each bedroom where the development application is made by a person other than a social housing provider, or	Sufficient car parking will be provided in alignment with the number of bedrooms proposed. An indicative layout has been provided demonstrating that this is achievable.	✓
(ii) 1 car space for each 5 dwellings where the development application is made by, or is made by a person jointly with, a social housing provider.		Not Applicable.

Therefore, the design the subject of the SCC achieves, or is capable of achieving, the design requirements associated with the Seniors SEPP.



8. STATUTORY PLANNING CONSIDERATIONS

State Environmental Planning Policy 65 – Design Quality of Residential Apartment Development

SEPP 65 applies to seniors housing developments. While further details will be provided at the development application stage, the following provides a summary of the proposed development having regard to the key design principles.

Building Depth

The depth of individual ILUs will be capable of achieving the maximum apartment depths of between 12 m and 18 m.

Building Separation

Within the site, the built form will exceed the minimum separation distances required.

To the site boundaries, the plans reflect that suitable building separation distances can be achieved having regard to the land uses on adjoining properties which have a non-habitable interface to the north, east and south. On the Anglicare land, the proposed setback distance of 12m complies with this requirement and is complemented by a 6 m setback on the Anglicare site, in total exceeding the minimum shared requirement of 12m for buildings up to four storeys.

Siting the Development

Matters relating to site analysis, orientation, communal open space, deep soil zones, visual privacy, and pedestrian and vehicle access have all been addressed under the Seniors SEPP requirements.

Designing the Building

These matters will be considered in detail at the development application stage. However, the apartment sizes are able to accommodate the necessary requirements in accordance with this clause.

Bankstown Local Environmental Plan 2015

By virtue of the development proposed, the SEPP Seniors Housing is the prevailing instrument. However, the provisions as relevantly contained in the BLEP are addressed below.

Aims of the LEP

The proposed seniors housing development is consistent with the relevant aims as set out below (Clause 2).

- (a) *to manage growth in a way that contributes to the sustainability of Bankstown, and recognises the needs and aspirations of the community,*



The proposed development provides a structured form of residential development, enabling the creation of a community for older or disabled persons, consistent with local needs and aspirations

- (b) to protect and enhance the landform and vegetation, especially foreshores and bushland, in a way that maintains the biodiversity values and landscape amenity of Bankstown,*

As demonstrated previously, the proposal will retain existing vegetation wherever possible and reinforce this with new landscaping and natural elements that maintains the biodiversity values and landscape amenity of this site.

- (c) to protect the natural, cultural and built heritage of Bankstown,*

The site is located in the heritage conservation area, known as Milperra Solider Settlement and will contribute to this by retaining the street pattern that reflects this area, while providing a positive return to the social heritage of the site, being for a communal living arrangement that was traditionally employed in this location.

- (d) to provide development opportunities that are compatible with the prevailing suburban character and amenity of residential areas of Bankstown,*

The Seniors SEPP provides the opportunity for residential development to be located on sites where there are existing registered clubs. As demonstrated by this report, the site has two predominant interfaces – one to residential development and one to industrial development, the latter of which is to be retained based on strategic planning goals. This being the case, the design outcome presented is responsive to this diversity in urban character and is positioned and sited such that amenity within the development and to neighbouring residential properties is suitably maintained.

- (e) to minimise risk to the community in areas subject to environmental hazards by restricting development in sensitive areas,*

There are no environmental hazards pertaining to the developable portion of the site that require risk minimisation. These aspects have been suitably considered, particularly as they relate to flooding and bushfire, with the land being deemed fit for purpose.

- (f) to provide a range of housing opportunities to cater for changing demographics and population needs,*

The proposal seeks to provide a diversity in accommodation for seniors and people with a disability. This responds to changing demographics as an ageing population becomes increasingly present. The varied design in apartment configuration will ensure that a diversity of needs are satisfied in this regard.



(g) to provide a range of business and industrial opportunities to encourage local employment and economic growth,

The retention of this site for the purpose of a registered club, including the golf course, will continue to reinforce and expand upon opportunities for local employment and economic growth. The in situ population associated with the development, along with the inclusion of learn to swim will reinforce these aspects.

(h) to provide a range of recreational and community service opportunities to meet the needs of residents of and visitors to Bankstown,

The proposed use of the site will retain its existing recreational use as a golf course and registered club, to be complemented by learn to swim facilities. This ensures that the needs of residents and visitors to the site are retained and enhanced in association with this application.

(i) to achieve good urban design in terms of site layouts, building form, streetscape, architectural roof features and public and private safety,

These matters are addressed as a requirement of the Seniors SEPP.

(j) to concentrate intensive trip-generating activities in locations most accessible to rail transport to reduce car dependence and to limit the potential for additional traffic on the road network,

The Traffic Impact Assessment associated with this applications demonstrates that the site does not derive intensive trip-generating activities and is well serviced by public transport opportunities.

(k) to consider the cumulative impact of development on the natural environment and waterways and on the capacity of infrastructure and the road network,

The technical reports demonstrate that the proposed use of the land will not result in an adverse cumulative impact on the natural environment nor local infrastructure.

(l) to enhance the quality of life and the social well-being and amenity of the community.

This proposal provides a significant opportunity to enhance the quality of life and social well-being of the local community. It allows for the provision of housing to service the needs of an ageing population, where people are able to move from larger homes into a smaller domestic arrangement and form part of a localised community that is age and need specific. This attracts like for like and derives a community that will form a strong social network, where people are able to help each other, particularly where there are like-minded needs. The proposal is representative of a strong community being able to be established on the site.

As such the proposed development is consistent with the Aims of the LEP.



Zoning

The site is located in the RE2 Private Recreation zone. The proposal complies with the objectives of the zone as follows:

- *To enable land to be used for private open space or recreational purposes.*

The proposed development will retain the existing use of the land for a golf course and will increase recreational opportunities through a learn to swim facilities.

- *To provide a range of recreational settings and activities and compatible land uses.*

By virtue of the provisions contained within the Seniors SEPP, the recreational uses will be complemented by the proposed self care residential accommodation on the site.

- *To protect and enhance the natural environment for recreational purposes.*

The proposed development will protect, retain and enhance the natural environment attributable to the site.

The proposal is therefore consistent with the zone objective.

The indoor recreation facility, outdoor recreation facility and registered club are permitted uses, with development consent.

Height of Buildings

Clause 4.3 of the BLEP stipulates that there is no permitted building height on the land.

Floor Space Ratio

Clause 4.4 of the BLEP stipulates that there is no floor space ratio on the land.

Heritage

Clause 5.10 addresses Heritage. As identified previously, the subject site is located in a heritage conservation area known as the Milperra Soldier Settlement. The proposed development will have no adverse impact on the conservation area.

Acid Sulphate Soils

That part of the site to be developed is located on Class 5 Acid Sulphate Soils; the proposed works are not likely to result in a lowering of the water table.



Earthworks

As part of the development application process, consent will be sought for the necessary earthworks to accommodate the development.

Flood Planning

As stated previously, the site is not subject to the 1% AEP flooding level.

The western and southern perimeter of the site are partially affected (less than 250mm) by the PMF level. Further, the PMF construction level is likely the result of minor drainage and not flooding; as such, addressing the PMF level is considered unnecessary.

Most importantly, the site is not located in a high hazard flood area.

Biodiversity

The subject site is not located on the Terrestrial Biodiversity Map; as such, clause 6.4 does not apply to this proposal.

Development in areas subject to aircraft noise

The subject site is located in the vicinity of Bankstown Airport, located to the north of the site. At the development application stage, detailed information will be required in terms of acoustic treatment to ensure that the amenity of residential dwellings within the development is not compromised.



9. CONSULTATION

As part of preparing this SCC, Hamptons provided a presentation to the members of the Club to explain to them the intentions of the SCC and how this would integrate with the continued use of the registered club and the golf course moving forward.

This was well-received by the majority of members.

A pre-development application meeting was also held with Canterbury-Bankstown Council (CBC). Having regard to Clause 25(2) of the SEPP, the Council raised concerns in relation to the compatibility of the development with surrounding land uses in terms of the natural environment; existing and approved uses; services and infrastructure; bulk, scale, built form and character; and native vegetation. The Council specifically raised concern with the following:

- Suitability of the development with respect to flood prone land
- Impact on existing trees, including potentially threatened species on Lot 13, DP 584447
- Compatibility with the existing industrial and low density residential development surrounding the site
- Compatibility with the bulk, scale, built form and character of the surrounding land uses, particularly due to the proposed building height and number of storeys.

In addition to the above, the Council indicated that the site forms part of the Bankstown Collaboration Area project, which will result in a strategy for future land uses, including industrial land. The Council also advised that this land will remain for industrial purposes on an indefinite basis.

The Council also raised concern that the proposed development has the potential to significantly limit or restrict future industrial land uses, given that seniors living is a highly sensitive land use. Further, any change to industrial activities would require an assessment on the potential impacts on the seniors housing development on that portion of the industrial zoning to the north, south and east.

The application was not considered supportable by the Council.

In response to the Council's concerns, the following comments are made:

- The evidence accompanying this application addresses the matters of flooding and confirms that there are no limitations in this regard.
- The impact on existing trees is also limited and the proposal seeks to limit the extent to which there is any interference with existing vegetation. The proposal also provides a significant opportunity to reduce the extent of hard surfaces, such as that derived by the extent of the existing car park, and provide material improvements to landscape and planting that is consistent with the balance of the subject site and would improve the overall appearance of the precinct, which has a heavy built form to landscape ratio given the extent of industrial development occupy nearby sites



- With respect to threatened species, there is no evidence of these being located within the site to which is to be developed.
- Matters of compatibility are addressed in this report.

While we accept the Council's concerns in relation to the use of this site for a residential purpose, which may potentially conflict with the industrial land uses within the vicinity of the site, residential land use is not precluded on the subject site by virtue of the Seniors SEPP. It instead provides a direct opportunity for registered clubs to create a cohesive form of development which can underpin the ongoing use of land for a recreational purpose in association with a registered club while complementing this with an *in situ* population that can utilise these elements, as well as the broader community being able to do so. Therefore, it is essential to recognise that while industrial land uses may seek to expand, the opportunity for land containing a residential club also has the opportunity to expand into a residential land use and is considered available to do so through a higher order planning instrument. While the compatibility test must still be achieved, it is inherent to recognise that private recreational land has the express provision to accommodate residential development and this is just as worthy of consideration in strategic planning terms as is the preservation of industrial land. As such, a balanced approach to ensure that the two uses are compatible is what should be considered by the consent authority and not one dominating over the other.

To some extent this is a question of compatibility, but it also one of buyer-be-ware and can be addressed through titling.

Consultation with government agencies has not occurred at this stage and would be undertaken as required during the development application process.

Contact was made with the DPIE to set up a meeting to discuss the proposal with them. Preference was instead indicated for the application to be lodged and the DPIE would contact the applicant during the assessment of the SCC.



10. COMPATIBILITY OF THE SITE

For an SCC application to proceed, it must satisfy the matters contained in clause 25(5)(b) of the Seniors SEPP. This requires the Panel to be of the opinion that the proposed development is compatible with surrounding land uses, having regard to the matters below.

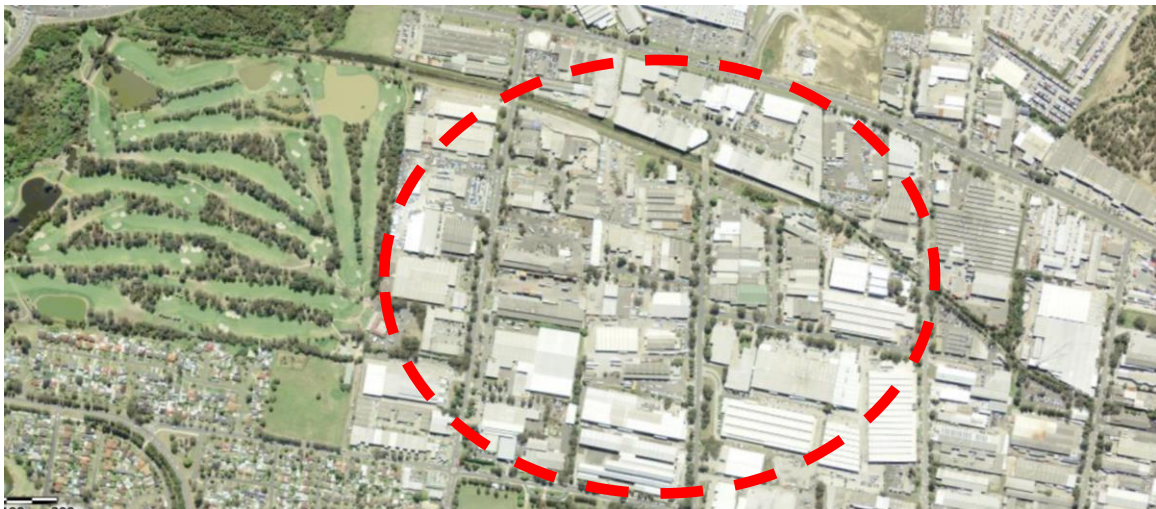
The Natural Environment

Matters pertaining to the natural environment relate to its physical condition and potential constraints that may inhibit development on the land.

As detailed above, there are potential, identified constraints, which include bushfire, threatened species and flooding. However, the reports accompanying this application demonstrate that the site is fit for purpose and will not compromise the suitability of the land for the intended use, both from an occupant perspective, nor from the perspective of impeding the natural environment.

With respect to existing uses within the vicinity of the site, these are detailed below.

To the north and east of the site, the land is zoned for both light and industrial land use purposes, which is evident when one traverses north-south along Ashford Avenue and further afield to the east.



The types of business range from trucking sales businesses, through to container storage. In terms of urban form, these generally comprise car parking areas towards the street, with built form set beyond this, generally of single or two storeys in height. The building forms are, however, of substantial height, such that the general appearance is of three and four storey building forms.

Vegetation to the street is relatively limited, with planting along the street frontage and rear sections of the site, which result in a substantial presence of concreted forms to the street frontage, presented on larger landholdings. The outcome is a harsh presentation of building form to the streetscape, with limited opportunities for passive surveillance or visibility to the frontages, particularly given that there is fencing to the street frontage for security purposes.

Pedestrian pathways are limited, and it is not an attractive or inviting streetscape, as one heads back towards the Hume Highway.

Directly south of the site are two separate land uses, divided by Bullecourt Lane.

Existing & Approved Uses

Within the vicinity of the site, as identified by the zoning map and previous descriptions, land within proximity to the site is generally zoned for residential or industrial purposes.

Research of current development applications within the vicinity of the site indicates only one major development that would bear relationship with the subject site. That application is at 27 Bullecourt Avenue, Milperra, which is the large vacant landholding, directly south-west of the site. The land is owned by Anglicare Retirement Villages.

The development application lodged in December 2017 has been significantly modified, and now seeks development consent for 81 independent living units and 107 residential care facility beds, as per amended plans, lodged with the Council in January 2019. The development application contains four buildings, with an overall floor space ratio of 0.6:1 (16,887m²) and buildings up to three storeys in height.

The application does not provide for extensive communal resident facilities on site but does satisfy the locational requirements for access to facilities and services within the vicinity of the site.

Aside from this application, there are no other substantial matters that would change the land use composition within the vicinity of the site.

Is the proposed development compatible with the surrounding land uses (existing and approved)?

Inherent in the SEPP (Seniors Living) is the ability for a seniors living development to be located on land where there is an existing registered club. This is the circumstances of this case. Therefore, as the higher order instrument over a local environmental plan, and given the recency of the LEP, it is reasonable to suggest that, in strategic planning terms, the Council has turned its mind, in preparing the LEP, to the fact that a seniors living development is permissible on the land and contemplated that such use is a possibility that may be derived in terms of not only its location, but also potential impacts.

The benefit of the subject site, in its physical composition, is that the landholding is set back from the industrial interface beyond Ashford Avenue. One is led down the driveway, which takes you away from the industrial interface and, due to the composition of surrounding built form on neighbouring sites, sends you into an isolated enclave of private recreational land that has limited physical or visual interaction with neighbouring sites which have turned their back to the subject site. This has had the benefit of internalising the golf club site, such that it externalises impacts that may otherwise derive from neighbouring industrial use.



Given the northern and western orientation of the allotment, the development of the subject site is able to turn its back to the adjoining industrial interface and similarly limit its interactive facades to the boundaries with industrial development, instead taking significant advantage of the golf course as a natural landform which derives a highly significant and positive outlook for the development that is without perceived impact or land use conflict.

The interface of the site with the proposed Anglicare development is extremely positive given that a similar type of development is proposed on that landholding such that there is the opportunity for a holistic aged care community to develop in this location, that is proximate to facilities and services. Further, the benefit of the golf course and Club facilities will foster social interaction and provide broader spaces for establishing a sense of community as a result of the development on these two sites. Therefore, there is no potential for conflict between these two land uses, being entirely compatible with each other.

On the southern side of Bullecourt Lane, where industrial uses remain and extend to Bullecourt Road, it is acknowledged that careful traffic management will be required having regard to the users of the subject site. Carefully designed pedestrian priority spaces along this interface will be important in ensuring the safety of residents of the development (and those of the Anglicare site), but will only result in an improved urban outcome, over what is currently an *ad hoc* stretch of road that is left unkept due to its lack of visibility. This will result in a nett improvement for residential properties within the vicinity of the site which are currently affected by the unsightliness of this laneway, particularly when viewed from the western side of Bullecourt Road.

To the west of the site, the proposed area of development is distant from the residential land holdings that align the southern boundary of the golf course, beyond the Anglicare land. This area is dominated by single and two storey dwellings and dual occupancy development. Given the physical distance, the proposal will not have any impact on these land uses that would otherwise affect the compatibility between the two. The existing recreational use will remain at the direct interface and the nature of the residential use is a softer use, entirely compatible with the existing residential character and use of that land to the west.

Therefore, the proposal satisfies criteria (b)(i).

Impact on Future Uses

Our discussions and investigations with the Council indicate that the land to the north and east will remain as industrial land uses for the foreseeable future as the demand for industrial land in this location is significantly high, being strategically positioned convenient to the arterial road network that is availed by the Milperra Road (A34) to the north and the M5 motorway to the south-west, off Henry Lawson Drive, the entrance of which is approximately five minutes' drive.



This then begs the question of potential land use conflict between the subject site and neighbouring industrial uses to the north, east and south, that may cause residents of any future development on the land to be concerned, or raise complaint associated with these uses.

As detailed above, the subject site has the benefit of turning its back to the directly adjoining industrial land uses, particularly to the north and east which have blank facades at the interface. Similarly, the composition of the built form on the subject site seeks to do the same, so that there is no direct visual relationship, nor opportunity for conflict at this lower level.

To the site directly south, the separation distances that are afforded between the boundary and the position of dwellings, as well as the general orientation of dwellings facing in the opposite direction to these, ensures that the potential or perceived adverse impacts are mitigated.

Further, the enclave of the landholding in which the proposed development will be positioned ensures that it is set well back from Ashford Avenue, and away from vehicular movements and, in turn, potential adverse noise conditions, that are associated with the industrial use of land. As detailed above, once entering the current arrangement into the site from Ashford Avenue, enables a high degree of separation, both visually and in terms of potential or perceived impacts associated with the industrial use of land that does not affect the proposed development's compatibility in this context.

In terms of the industrial use's south of the site on Bullecourt Lane, similar to the Anglicare landholding, this too will have an interface and, in some respects a more direct interface with that industrial land, than the proposed development. The designation of that land for residential purposes, through the LEP, reflects that an acceptable relationship is considered achievable in land use planning and potential conflict terms, without compromising the operation and amenity of either land uses.

Will the proposed development impact on the future use of surrounding land?

No. The proposed development is located on land that contemplates interaction with a private recreational facility, in this case a golf club. In a strategic planning sense, the potential use of this land must have been contemplated by the Council as a possible future use when the LEP was developed.

The on-going demand for industrial land is clearly evident in the LGA, with the Council's strategic direction seeking to ensure that the quantum of industrial land is not depleted. This, however, has not stopped the designation of industrially zoned land at the interface with residentially zoned land, such as that presented at the interface with both Bullecourt Road and Bullecourt Lane. In both circumstances, the likely future uses, being for industrial and residential uses have been contemplated in terms of their interaction with each other and considered acceptable. By introducing a residential use on the subject site, as a future use, will retain use of that land that is similar to the composition of land use that is directly south of the site. that



relationship, by virtue of zoning, has been considered acceptable and the use of the land, in this case, for a residential purpose, has the same outcome.

In many ways, the future use of this land for residential purposes has greater opportunity to turn its back on, and screen itself from the adjoining industrial uses given the composition of building forms on those adjoining sites and the ability for the proposed residential development to turn its back to those uses, given the size of the landholding and the visual and spatial opportunity that the golf course presents, as a key lifestyle feature in association with this development.

That being the case, the proposal is compatible with the surrounding future uses in accordance with (b)(ii).

Services & Infrastructure

An indicative stormwater concept plan accompanies this SCC, including on site detention and rainwater tank location, as well as connecting locations to the existing stormwater system.

With respect to electricity supply, should there be a need for substation works, these would be advised upon at the development application stage. There is, however, sufficient space on the site, to accommodate a new substation should this be required.

Water and sewer services are available to the property and augmentation will be undertaken as necessary to accommodate the density as sought.

The Traffic Impact Assessment accompanying this SCC demonstrates that the vehicle movements entering and leaving the site, and the associated effect on the road network in the vicinity of the site will not decrease below a level of service 'A'.

It is acknowledged that works would be required to Bullecourt Lane, not only to formalise the roadway, but also to provide sufficient pedestrian access through to Bullecourt Road and on to the local shopping centres at the corner with Ashford Avenue to ensure compliance with the relevant gradients as stipulated at Clause 26. Further, the bus service timetables provided at Annexure 7 demonstrating that the service provision achieves the requirements of Clause 25(2)(b)(iii).

Access to facilities and services has been addressed at Chapter 2 of this report with these achieved both within 400 m of the site and within 400 m of a public transport stop nearby to the site to provide access the facilities and services, as set out at Clause 26(1). Further location maps are prepared in the SCC Report prepared by Altis Architects, which also assist to demonstrate the achievement of this criteria.

Therefore, the proposal is compatible having regard to clause (b)(iii).

Provision of Open Space



The use of the golf course site is for private recreational purposes. This principal purpose of the land as a golf course will remain, despite the proposed ILUs.

Therefore, there will be no reduction in private open space to service the local community as a result of this SCC.

Further, the new club facilities that would be incorporated into the development will assist to increase the offering that the site provides to ensure a greater opportunity to a broader number of user groups.

The introduction of a learn to swim centre within the development will also add to the provision of private recreational facilities that are availed to the immediate locality. The position of this has no depletion of open space area of the golf course proper, but instead reinforces the role of the site as part of the private open space network servicing the locality.

Will the proposed development impact on the provision of open space, thereby reducing the site's compatibility with surrounding land uses?

No. The proposed development will retain the existing open space network and result in better facilities that will open this up to a broader range of demographic and user groups.

Impacts of Built Form

The SCC assessment requires consideration of the effect of the bulk, scale, built form and character of the proposed development on the existing uses, approved uses and future uses of land in the vicinity of the development.

As detailed above, the site is proximate to industrial and residential uses and, particularly to the west of the site, residential development interfaces with industrial land. Strategic planning policy indicates that this interface will remain for some time.

Therefore, the effects of the bulk, scale, built form and character must be considered in a static context.

The bulk and scale of the development warrants consideration in terms of the immediate context as well as further afield.

Views further afield

Views 2-8 in the Urban Design Report are taken from a larger context and show the visibility of the development from various locations.

View 2 from Henry Lawson Drive, looking north-east, provides a view across the low-density residential environment, with the golf course behind this. The post development outcome shows that there would be a



minor level of visibility as one passes east along Henry Lawson Drive, behind the existing dwellings which dominate the foreground of this view. Given distance from the site, this would not be visually dominant.

View 3, west of the site, again along Henry Lawson Drive, demonstrates that the vista of the golf course and the vegetation thereon will dominate the visual context and presentation of the proposed built form will be of no consequence, when looking east across the site. Therefore, the bulk and scale, when viewed from this location, is of no consequence.

For View 4, taken from a west-north-west location, while there may be some level of visibility, this will be limited in scale, through a slotted view that is dominated by existing vegetation both off site and across the golf course. The effect of the bulk and scale will therefore be very limited given the extent of vegetation which will impede the visual context of the development, such that the bulk and scale has very limited discernibility from this location.

View 5, to the north-west of the site, at the intersection of Henry Lawson Drive and Milperra Road indicates that there is no visibility from this vantage, given the extent of vegetation that avails this intersection. However, even if this were removed, the distance towards the subject site would not result in the built form being a dominant visual element, nor aggressive in terms of bulk and scale. The distance from this intersection, as well as the scaled built form in a westerly direction across the site, sees the alignment of that form intersect with the residential land uses further south and east of the site, such that the bulk and scale is acceptable in this context.

View 6, which is almost directly north of the site, is considered from Milperra Road, to the south of Bankstown Airport. This view encapsulates a southerly view across the golf course and will include a view of the scale of development, as proposed within this SCC application. This view captures the industrial context in which the site is located and again shows that the built form will, by and large, be screened by existing vegetation on the golf course. However, even if this view was not availed of vegetation, similar to View 5, the distance from this viewing location, as well as the scaled built form, as one considers the western view of the site, as it moves towards residential development, which includes both the future redevelopment of 27 Bullecourt Road, as well as the residential environment further west of that, demonstrates that the bulk and scale of the development reduces such that there is a scale and composition that is not obtrusive to the industrial forms that prevail to the east of the site. Instead, there is an appropriate transition to the west to ensure that the pattern of development is responsive to this diverse context, where built form is contrived of solid walls with limited articulation or openings on the industrial land, to a softer and smaller composition of form for the existing residential context. This is refined by the significant lowering of Building A, which decreases in scale and prominence as it arrives closer to its residential context.



View 7, from the intersection of Milperra Road and Ashford Avenue, demonstrates that the existing industrial built form will dominate the view towards the subject site, long before the proposed form, despite being larger in scale.

While it would be taller in a built form context, the dominance of solid industrial buildings will dominate the visual catchment, before the residential context is experienced. Further, the degree of articulation to the proposed building form, will assist to reduce the perceived massing providing a balanced backdrop to the more dominant industrial buildings, before one's eye is drawn to the proposed form.

View 8, north-east of the site demonstrates that the bulk and scale would have no visual presence from this location.

Therefore, of these more distant views, it is evident that the bulk and scale of the development will have limited, if any, discernibility, from various locations within the broader vicinity of the site. This is prevented by the existing landscape character, both across the golf course site, but in the general locality, as well as the dominance of existing built form, generally of an industrial nature which, due to its solidity, dominates the visual landscape, long before the proposed development would. Further, the extent of articulation that would be provided to the proposed development will ensure that there is a much softer built form presence, with suitable transition to adjoining residential developments to the south and east, such that the form is not out of context in this landscape.

In this context, the impact of the bulk and scale of the proposed buildings is limited and acceptable.

Localised Views

Views 1, 9 and 10 also provide vantage of the proposed development, but from locations closer to the subject site. View 1 is from the intersection of Bullecourt Avenue, with Bullecourt Lane, directly south of the site. The view has not transposed the built form that is proposed on 27 Bullecourt Avenue as the development has not been approved. However, inspection of the current plans before the Council indicates that there will be a general scale of development in the order of two storeys, which would impose upon the left-hand side of this montage.

In appreciating that the left-hand side of the photograph may have two storey forms, it is apparent that Building A on the subject site will be slotted comfortably within the building form on the adjoining land. However, even if this development were to never eventuate, the tree-lined aspect along the boundary of the subject site does a large proportion of the work to screen the development. Even if this were, however, depleted, the form of the building rests comfortably within the height of vegetation along this boundary, which sets the appropriate scale. While there is no other residential development immediately adjacent, the scale of Building A will fit comfortably within the context of the industrial buildings to the east of the site and



have a visible sense of being lower in scale, and less dominant, with a high degree of articulation, that is softer in the landscape than the existing industrial forms.

The remaining buildings as they present to Bullecourt Lane will be more prevalent in this context. However, the impact of this form is not negative, instead providing a structured form to the end of the lane, that appears consistent with those properties on the eastern side of the street. The articulation of these forms will break down the building bulk such that there is a balanced composition of overall building form that is delineated with recesses, along with variation in materials that will reduce the perceived composition of the building when viewed from this vantage.

Further, assuming that 27 Bullecourt Avenue is redeveloped, the view towards the subject site will have a lesser prevalence with the visual form being dominated by a stronger presence on this neighbouring site, such that the proposed form is even less reduced. However, even if this development did not proceed, the scale of development which appears no greater in height than the industrial buildings that are closer to the view line, on the southern side of the lane, would remain acceptable.

View 9 is taken from the site entry, looking down the existing driveway, and into the site. Vegetation, by and large, will frame this view, along with the industrial buildings that are located closer to the street frontage than the proposed building form. It is these closer buildings that remain the prevalent feature to the street and there is limited bulk and scale perceptible, from the vantage that would cause any offence, given the setback distance into the site.

View 10 is taken from the intersection of Ashford Avenue and Bullecourt Road. This demonstrates that the bulk and scale of the development would have no visibility from this vantage point due to the scale of the existing buildings, which include a petrol station and industrial buildings adjacent. These existing building effectively screen any view of the development from this location. This is reinforced with Building A being stepped down to the west which further limits is perception from this vantage point.

Therefore, of the more localised views, View 1 is the likely vantage where the proposed bulk and scale would be more evident than other locations within the immediate vicinity of the site. The existing landscape character, transitional built form and scale of existing industrial buildings surrounding the site all contribute to assisting a relatively screened built form as proposed on the subject site. In its own right, the higher building form is tucked into an envelope of land that is not visually prevalent and behind existing industrial forms, meaning that there is a lesser degree of visibility and the otherwise perceived bulk and scale of the building form is reduced.

The consideration of this will be even less if 27 Bullecourt Avenue is developed, as it is this form which will dominate the visual catchment as opposed to the subject site. This SCC does not, however, stand or fall on that site being developed, it simply goes to the question of future character.



That being the case, it is considered that the bulk and scale of the SCC proposal is limited, not offensive when viewed on a short or long term range, and suitably positioned on the site so as not to dominate the adjoining landholdings, or the golf course itself, being tucked into a section of the site that enables it to comfortably fit, while retaining a strong landscape linkage and courtyard experience that is a derivative of other sites within the vicinity.

Leading then to appropriate built form and character, strategic policy, as stated above, dictates that the industrial character is likely to remain for some time to come. Accepting that there are two distinct interfaces with the subject site, being of residential and industrial composition, the built form outcomes have been carefully and skilfully designed to ensure that the interaction of the proposed development with these faces does not result in adverse outcomes.

The size of the land where the proposed development will occur enables the residential composition of the development to turn its back to the existing industrial land uses to avoid adverse amenity impacts, but also to capitalise on the vantage that is available to the west and north of the site, which provides a significantly strong visual landscape afforded by the golf course, which benefits from existing vegetation. Further, the width of this area further assists to enable development to be spread out and blend into this broader landscaping outcome without resulting in a cramped form.

The stepped form of Building A, being lower in scale than the other proposed buildings, along with its semi-circular nature, that enables it to connect with the property to the west of the site, provides a suitable visual transition to the two storey form that is proposed of Building A on the adjoining site (subject to the development proceeding). However, even if the current development proposal did not occur, the scale of the building form as proposed will comfortably fit with the context of proposed Building A, such that the built form will not compromise the residential character of this adjoining parcel of land.

The proposal is therefore acceptable in terms of built form and character having regard to the existing and proposed context of the site.

Impact on Native Vegetation

As detailed previously, while the Section 10.7 certificate pertaining to the land indicates the presence of threatened species on the subject site, the location in which the development is positioned will not have any impact on potentially threatened species.

Matters of tree removal are addressed in the Arborist Report and appropriate replanting would be identified as part of the development application stage.

Will the proposed development impact on native vegetation, thereby reducing the site's compatibility with surrounding land uses?



No. The proposed development will not affect native vegetation that would otherwise compromise the site relationship in this context.

Impacts identified by a cumulative impact study

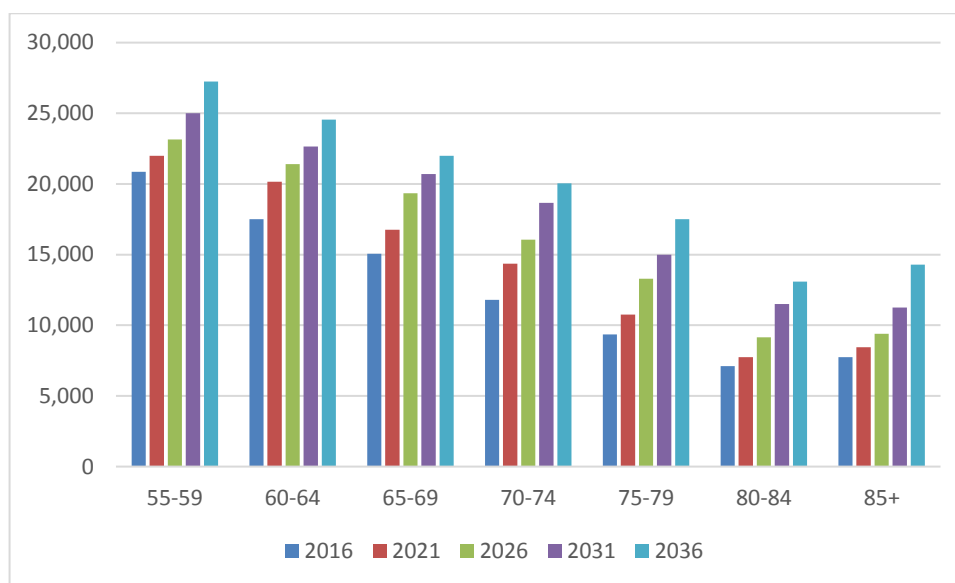
A cumulative impact study is not required as part of this application. Should this be requested by the Panel then this would be supplied accordingly.



11. THE PUBLIC INTEREST

The proposal for a Seniors Living development on the subject site is in much needed supply within the Canterbury Bankstown Area and is well documented, including in the relevant district plans. The then Department of Planning and Environment, in 2016, released population projection data on a local government area basis, the extract for the Canterbury Bankstown area being provided below. This demonstrates the increase in the ageing population that is projected through to 2036, with a steady increase evident in the older age cohorts, particularly in the 55-64, 75-79 and 85+ age groups.

Figure 17: Population Projections for Aged 55+ years (2016-2036)



(Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Demography/Population-projections>)

The proposal will therefore provide a form of housing that will be in high demand in the coming years, particularly as the ageing population grow. By providing housing in locations where seniors are seeking to 'downsize' will allow them to stay close to their existing communities, which is important from a social interest perspective; as such, provision of accommodation on the site for this purpose is considered to be in the public interest.

By enabling development for this purpose will also support the on-going viability of Bankstown Golf Club, ensuring that it continues to provide a valuable private recreational activity to the local community and the broader area.

As such, the development as sought is well within the public interest.



12. CONCLUSIONS

Hamptons has been retained by the property owner, Bankstown Golf Club, in relation to the land known as 70 Ashford Avenue, Milperra. The purpose of this application is to obtain a SCC on land that contains an existing registered club, in accordance with the Seniors SEPP.

The purpose of the SCC is to establish the suitability of the land for the intended purpose, in this case, a serviced self-contained senior's living development, comprising ILUs. Detailed design of each of the ILU's would occur at the development application stage; however, this application establishes that, based on general principles pertaining to character, compatibility and overall design principles, the subject site is suitable for the intended purpose. Most importantly, this SCC application:

- is consistent with the strategic planning considerations that are relevant to this location and, by virtue of site layout, allow a seniors living development on the land that will not compromise adjoining land uses, nor create adverse land use conflict
- is capable of achieving both the site and design related requirements to enable the implementation of the development, including on-site services
- is consistent with the compatibility criteria, having regard to the existing and future uses within the vicinity of the site, the consideration of natural site features which do not impede the proposed use, and provides a bulk and scale of building form that is consistent with the future character of the area that does not impede the visual catchment
- is in the public interest, having regard to the site's proximity to facilities and services, as well as demand for accommodating given the population projections for the local government area which demonstrate that over the next 20 years there will be a significant and material increase in the ageing population within the vicinity of the site.

This being the case, this SCC application should be supported and enabled to proceed to a development application.

