

Planning Proposal Report



53A – 59A Gloucester Road, Hurstville

On behalf of
Regis Aged Care Pty Ltd
April 2022



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1 Executive Summary

Introduction

Regis Aged Care (the Proponent) is one of the largest providers of aged care in Australia. It operates 65 facilities Australia wide and is committed to providing the highest quality of care.

This Planning Proposal relates to the redevelopment of the existing Regis Aged Care facility at Hurstville known as 'Regis Hurstville'. This facility supports 96 beds and offers ageing-in place, palliative care and respite care services.

The Proponent has identified the need to modernise Regis Hurstville to ensure the facility continues to provide the highest quality services for the community's ageing population. This Planning Proposal has been prepared to request amendments to the *Georges River Local Environmental Plan 2021 (GRELP 2021)* to assist the Proponent in achieving their vision for the site and community.

The Site

The site is located at 53A – 59A Gloucester Road, Hurstville within the Georges River Local Government Area (LGA). It is located approximately 1.2km from the Hurstville Central Business District (CBD) and 24km from Sydney CBD. It is strategically located approximately 400m from the Hurstville Strategic Centre which functions as one of the Southern District's largest commercial centres and sources of local employment.

The site is well serviced by public transport and is positioned approximately 950m away from Hurstville Railway Station, 1.3km from Penshurst Station and 9.6km from Sydney Kingsford Airport. It is also located in proximity to Hurstville Private Hospital and open space comprising Hurstville Oval located approximately 210m and 500m from the site, respectively.

The site is located within and surrounded by land zoned R2 Low Density Residential. Notwithstanding this, the developments to the south, east and west consists of medium density residential flat buildings that typically reach three (3) storeys in height. Areas of R4 High Density Residential are also located directly adjacent to the site to the north-west.

The nearby Hurstville CBD has a transitional character where aged building stock is being redeveloped for contemporary high to medium scale commercial and mixed use tower developments. These developments are highly visible from the site and frame the setting of the development envisaged by this Planning Proposal.

Intent of the Planning Proposal

The existing aged care facility contained within the site is required to be upgraded and expanded in response to the unprecedented demand for aged care facilities. The facility at present has capacity to support a limited number of occupants, with it only capable of accommodating 96 beds. It also provides few ancillary services to support the needs of residents and contains building stock that is in need of replacement.

The demand for aged care facilities and the changing built form context resulting from the densification of the Hurstville CBD as well as the dominant three storey building typology in the immediate surrounds provide the opportunity to intensify the site's uses and deliver a denser built form.

In this context, the Proponent's vision is to redevelop the site for an aged care facility that meets contemporary standards, is of high quality design and provides an array of ancillary uses that will improve the quality of life and care for occupants. The aged care facility envisaged by this Planning Proposal will also continue to provide ageing-in place, palliative care and respite care services; however, is capable of supporting a greater number of occupants as well as staff. In this regard, it will further improve the community's access to quality aged care facilities and facilitate job creation.

To facilitate the achievement of the Proponent's vision, the Planning Proposal seeks to add a local provision in the local planning instrument as follows:

6.17 Development on land at 53A-59A Gloucester Road, Hurstville

- (1) The objective of this clause is to enable a residential aged care facility with minimal adverse impacts.*
- (2) This clause applies to land at 53A-59A Gloucester Road, Hurstville, being Lot 10, DP1077198 and Lot Y, DP411930.*
- (3) Despite clause 4.3 (2), the maximum building height for development for the purposes of a residential aged care facility on land to which this clause applies may range from 12m, 14m and 16.9m as guided by the site-specific development control plan for the land.*
- (4) Despite clause 4.4 (2), the maximum floor space ratio for development for the purposes of a residential aged care facility on land to which this clause applies is 1.6:1.*

Strategic and Site Specific Merit

As demonstrated by this Planning Proposal, the development facilitated by the proposed LEP amendments has strategic and site specific merit in that it will:

- Facilitate the provision of high quality aged care facilities that respond to changing demographic trends, including the unprecedented growth of the ageing population;
- Facilitate investment in health services and social infrastructure that will support the liveability and productivity Planning Priorities for the South District;
- Provide scope for a future development to achieve best practice sustainability measures in accordance with the aspirations of the local and regional strategic planning framework;
- Foster collaboration between government, community and business by delivering a development outcome that has been prepared in close consultation with Council and community;
- Result in a suitably scaled built form that responds to the scale of the surrounding development without compromising the amenity of surrounding residential properties;

- Encourage job creation that will assist in meeting local jobs targets; and
- Not give rise to any adverse environmental, economic or social impacts as evidenced by the environmental assessment set out in this report and supporting subconsultant reports.

Conclusion

The Planning Proposal is consistent with the directions and priorities nominated by the applicable strategic policies and statutory plans. It has been submitted to the Gateway for determination and is now to be placed on public exhibition.

1 Introduction

This Planning Proposal has been prepared by Mecone on behalf of the Proponent in relation to the site located at 53A – 59A Gloucester Road, Hurstville (the site).

The Planning Proposal seeks to amend the *Georges River Local Environmental Plan 2021* (GRLEP 2021) to permit an additional local provision specifically for a residential aged care facility at the site. The proposed LEP amendments are as follows:

6.17 Development on land at 53A-59A Gloucester Road, Hurstville

- (1) *The objective of this clause is to enable a residential aged care facility with minimal adverse impacts.*
- (2) *This clause applies to land at 53A-59A Gloucester Road, Hurstville, being Lot 10, DP1077198 and Lot Y, DP411930.*
- (3) *Despite clause 4.3 (2), the maximum building height for development for the purposes of a residential aged care facility on land to which this clause applies may range from 12m, 14m and 16.9m as guided by the site-specific development control plan for the land.*
- (4) *Despite clause 4.4 (2), the maximum floor space ratio for development for the purposes of a residential aged care facility on land to which this clause applies is 1.6:1.*

While the GRLEP 2021 building height and FSR maps are not proposed to be amended, the building heights are proposed to be distributed within the site as illustrated in **Figure 1** below.



Figure 1 - Maximum Building Height

Source: Mecone

The Planning Proposal has been prepared in accordance with Section 3.33 of the EP&A Act and the NSW Department of Planning and Environment's (DPE's) '*Local Environmental Plan Making Guideline*'.

Specifically, the Planning Proposal includes the following information:

- A description of the site in its local and regional context;
- Part 1 – A statement of the objectives of the proposed instrument;
- Part 2 – An explanation of the provisions that are to be included in the proposed instrument;
- Part 3 – The justification of strategic and potential site-specific merit, outcomes, and the process for implementation;
- Part 4 – Maps where relevant to identify the effect of the planning proposal and the area to which it applies;
- Part 5 – Community Consultation; and
- Part 6 – Project Timeline to detail the anticipated timeframe for the proposed instrument.

The Planning Proposal is accompanied by the following reports:

- **Appendix 1** – Indicative Architectural Concept;
- **Appendix 2** – Survey Plan;
- **Appendix 3** – Traffic Impact Assessment;
- **Appendix 4** – Urban Design Principles; and
- **Appendix 5** – Landscape Statement.
- **Appendix 6** – Site Specific Development Control Plan

1.1 Proponent and Project Team

The planning proposal has been informed by the following accompanying reports prepared by the project team:

Table 1. Project Team	
Urban Planning Assessment	Mecone
Urban Design Principles	Mecone and O'Neil Architecture
Architects	O'Neill Architecture
Traffic Impact Assessment	JMT Consulting
Surveyor	RPS Group
Landscape	Arcadia

1.2 Background and Consultation with Council

The Proponent has collaborated closely with Georges River Council (Council) over a number of years to develop the Planning Proposal and the associated Indicative Architectural Concept design included at **Appendix 1**.

The Proponent originally submitted a Planning Proposal for the site in February 2018. The Planning Proposal sought amendments to the previous Hurstville LEP 2012 to facilitate a residential aged care facility with 160 beds and 51 car parking spaces. The proposal sought an FSR of 1.6:1 and a maximum height of 13.6m.

To facilitate Council's assessment of the Planning Proposal, Architectus was commissioned to undertake a peer review of the Planning Proposal and associated Indicative Architectural Concept.

In response to the peer review and consultation with Council, including follow up meetings and the submission of responses to Request for Further Information, the Proponent has amended the scheme. The current Planning Proposal seeks to facilitate a residential aged care facility with 110 beds and 41 car parking spaces. The proposal seeks an FSR of 1.6:1 and a maximum building height of 16.9m (variable across the site).

Gateway Determination was granted by DPE on 28 February 2022 which requested that the Planning Proposal be updated to address the current legislation including Georges River LEP 2021, the new SEPP (Housing) 2021 and the Georges River Housing Local Strategy 2020. These changes have been captured within this revised report.

2 Site Information

2.1 Site Context

The site is located at 53A-59A Gloucester Road, Hurstville within the Georges River LGA. It is located approximately 1.2km from the Hurstville CBD and 24km from Sydney CBD.

The site is well serviced by public transport. It is positioned 950m distance from Hurstville Railway Station, 1.3km from Penshurst Station and 9.6km from Sydney Kingsford Airport. It is also located in proximity to Hurstville Private Hospital and open space including Hurstville Oval located approximately 210m and 500m from the site, respectively.

The locality is characterised by a mix of uses, including low to medium residential dwellings and high density residential flat buildings. The nearby Hurstville CBD has a transitional character whereby traditional built forms are being redeveloped for high to medium scale commercial and mixed use tower developments.

The site's location and context are shown in **Figures 2 and 3**.

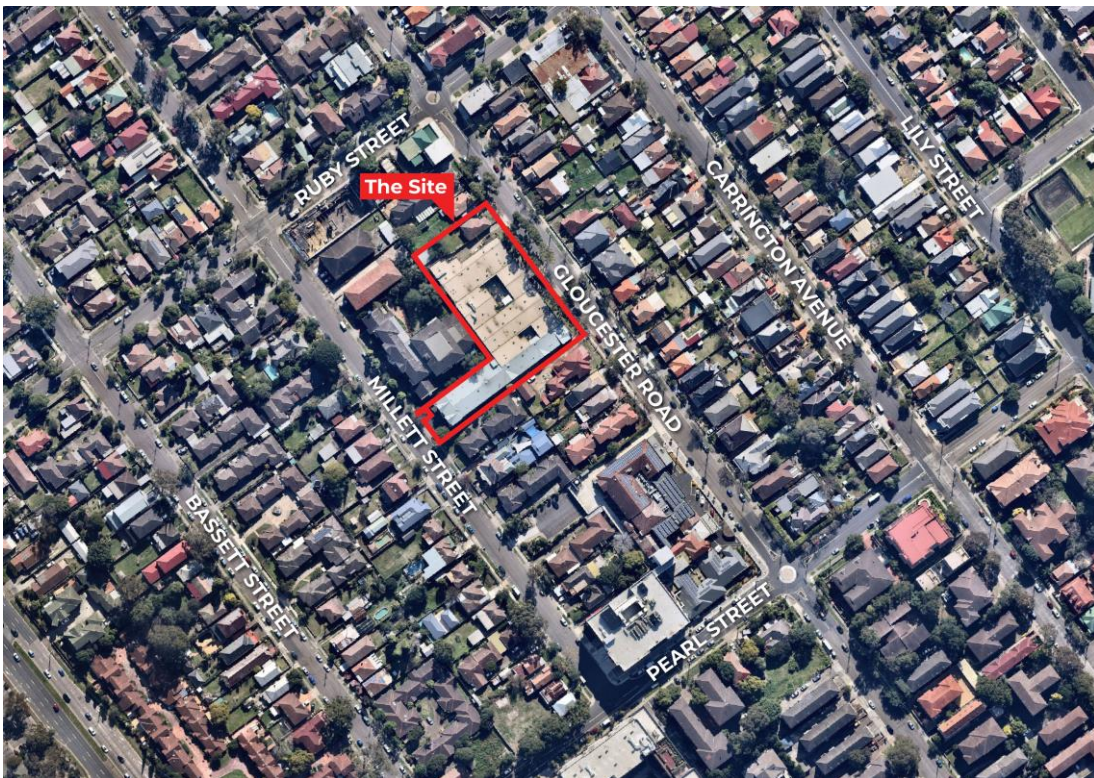


Figure 2 – Site Aerial Map

Source: Mecone/Mosaic



Figure 3 – Site Context Map

Source: Mecone/Mosaic

2.2 Site Description

The table below provides a description of the subject site.

Table 2. Site Description	
Item	Description
Legal description	<p>The site is legally described as:</p> <ul style="list-style-type: none"> • 53A Gloucester Road, Hurstville – Lot 10 in DP 1077198 • 59 A Gloucester Road, Hurstville – Lot Y in DP 411930
Total area	5,267m ²
Address	53A – 59A Gloucester Road, Hurstville.
Existing use	Aged Care Facility operated by Regis Aged Care
Surrounding Development	<p>The surrounding development is as follows:</p> <ul style="list-style-type: none"> • North: A mix of one and two storey detached dwellings positioned beyond Gloucester Road; • East: Single storey detached dwellings with shop top housing developments reaching two storeys located at the intersection of Gloucester Road and Ruby Street; • West: Single storey detached dwellings and Hurstville Private Hospital and three storey residential flat buildings; and • South: Low scale detached housing, inter-war flat buildings and medium scale residential flat buildings reaching a maximum of three storeys. To the south east lies Hurstville Private Hospital and high density residential development that occupies the fringe of the Hurstville CBD.
Heritage	<p>The site is not listed as a heritage item nor is it located in a Heritage Conservation Area (HCA). The site is however located in the vicinity of two heritage items - these being I122 positioned to the south and I123 to the west. Both consist of detached single storey dwellings.</p>
Access and Public Transport	<p>The site is within walking distance of the following railway stations:</p> <ul style="list-style-type: none"> • 12 minutes walk of Hurstville Station (950m) • 17 minutes walk of Penhurst Station (1.3km). <p>The site is located in proximity to a number of bus routes including route 450 directly adjacent to the site on Gloucester Road which provides connections to Strathfield and Hurstville CBD.</p> <p>It is also located in proximity to a range of bus services along Forest Road and Bridge Street (M91, 940, 941, 943, 945) which provide connections to Parramatta, Bankstown, Punchbowl and Padstow.</p>

2.3 Existing Development

The existing development contained within the site comprises an aged care facility known as Regis Hurstville that is presently owned and operated by Regis Aged Care.

The building envelope adopts an irregular 'L' shape configuration and has a primary frontage to Gloucester Road of approximately 88m. The building extends to southern rear boundary where it has a frontage to Millett Street of 20m. At this frontage, the building provides a vehicular entrance point for ingress/egress that facilitates access to an internal carpark.

The existing aged care facility consists of a brick-clad building that is orientated towards Gloucester Street. It is setback from the street frontage and presents as being a single storey building. The building increases to two storeys towards the rear where it fronts Millett Street. Landscaping consisting of open lawn and low-lying shrubs are accommodated within the front, side and rear setbacks.

Photos of the existing development contained within the site are provided below.



Figure 4 – Site viewed looking South from Gloucester Road
Source: Mecone



Figure 5 – Site viewed looking North from Millett Street
Source: Mecone



Figure 6 – Existing interior view of Facility
Source: Mecone



Figure 7 – Site viewed from Gloucester Road
Source: Mecone

2.4 Surrounding Development

The development in the immediate surrounds is predominantly characterised by a mix of detached residential dwellings and multi storey residential flat buildings.

East

To the immediate east of the site is Gloucester Road, which provides connections to Hurstville CBD to the south and Beverly Hills CBD to the north. Adjacent to the east of Gloucester Road, the development faces one and two storeys attached and detached dwelling houses with brick facades. The development is also located within proximity of public recreation including Hurstville Oval Park to the south-east of the site. A nursing home known as 'Shangri-La Nursing Home' is positioned to the north-west along Carrington Avenue.

West

To the immediate west, the site directly interfaces with a residential town house complex with a height of three (3) storeys. Its windows and balconies are orientated towards the Millett Street away from the site. Further westward along Millett Street, the development relates to low density dwelling houses of one storey in height.

King Georges Road is located approximately 230m west of the development, which serves as a major arterial road and provides connection to Blakehurst to the south and Roselands to the north. Hurstville Aquatic Leisure Centre is located approximately 200m west of the site.

North

To the immediate north, the site is adjacent to low density residential dwelling houses of one storey in height. Beyond this lies low scale residential flat building of two (2) storeys and mix-used building of 2 storeys comprising retail shops at ground floor and residential use at upper floor.

Commercial premises are located at the intersection of Gloucester Road and Ruby Street.

South

To the immediate south, the development predominantly consists of single storey detached residential dwellings, as well as a child care centre. Beyond this lies Hurstville Private Hospital which accommodates buildings of varying scales ranging from one (1) and five (5) storeys.

Further south, the development relates to Hurstville CBD which comprises a range of residential and commercial towers that are highly visible from the site.

Hurstville Train Station is located approximately 940m to the south of the development, which provides good connection to Sydney CBD.

Photographs of the surrounding development are shown below.



Figure 8 – Towers within Hurstville CBD
Source: Mecone



Figure 9 – 3 Storey Flat along Millett Street
Source: Mecone



Figure 10 – Hurstville Private Hospital
Source: Mecone



Figure 11 – Dwellings to the immediate East
Source: Mecone

3 Planning Context

3.1 Strategic Planning Context

The Planning Proposal is informed by the planning priorities nominated by the local and regional strategic planning framework.

The framework identifies that the unprecedented growth of the ageing population is an anticipated demographic shift that will necessitate the provision of more diverse housing options as well as social and health infrastructure.

In addition, the strategic framework identifies the need to prioritise the retention of employment generating uses that will facilitate job creation to meet jobs targets and provide necessary services for the community.

A detailed discussion of the key strategic plans is provided below. The Planning Proposal's consistency with each plan is addressed in **Section 7**.

A Metropolis of Three Cities

The Greater Sydney Region Plan – A Metropolis of Three Cities (the Plan) was released in March 2018. It provides a 40-year vision (to 2056) for the Greater Sydney Region and establishes a 20-year plan to manage the growth of Greater Sydney. It identifies a vision for Greater Sydney to emerge as a metropolis of three cities comprising the Western Parkland City, the Central River City and the Eastern Harbour City.

The concept of three cities is predicated on the aspiration of its residents to live within 30-minutes of education, facilities, city-scale infrastructure and services and employment opportunities. To achieve this vision, the Plan nominates 10 Directions centred around a framework based on the core themes of liveability, productivity and sustainability. These include:

1. A city supported by infrastructure
2. A collaborative city
3. A city for people
4. Housing the city
5. A city of great places
6. A well-connected city
7. Jobs and skills for the city
8. A city in its landscape
9. An efficient city
10. A resilient city

Each direction is supported by objectives and indicators that support the implementation of the Plan and respond to population growth and changing demographics.

The Plan forecasts that the population is projected to grow to 8 million over the next 40 years, with almost half of this population growth residing beyond Parramatta. As

such, there is a need to ensure infrastructure, services and housing meet changing needs and to ensure facilities such as those for the ageing population are delivered equitably across Greater Sydney.

The Plan identifies that there is a growing demand for community and health infrastructure due to shifting demographics, including the record number of births each year and the growing ageing population. With respect to the ageing population, the proportion of individuals over the age of 65 years is projected to increase from 13 to 18 percent over the next 20 years. The projected growth in the ageing population will increase the demand for services, housing and infrastructure that must be tailored to meet the varying needs of population groups.

South District Plan

The South District Plan (the District Plan) is intended to guide the implementation of the Plan at a district level and bridge regional and local planning by influencing Local Environmental Plans and Planning Proposals.

The District Plan provides detailed planning priorities which integrate relevant objectives, strategies and actions in response to identified challenges and opportunities. The planning priorities relate to three key aims of the District Plan, with these being:

- A productive city;
- A liveable city; and
- A sustainable city.

The District Plan's overarching vision reflects the priorities of the Plan. This vision is for residents in the South District to have improved access to a wide range of jobs, housing types and activities and to improve the District's lifestyle and environmental assets. This vision will be achieved by delivering on a range of priorities, including the need to match growth with infrastructure, including social infrastructure.

In accordance with the District Plan, the site is located within proximity to the Hurstville Strategic Centre. Strategic Centres serve as key nodes of activity that are instrumental to providing job opportunities in proximity to key services and housing. In light of this, the Plan establishes a baseline jobs target of 15,000 and a higher target of 20,000 by 2035.

Hurstville is a centre that serves as a community hub of activity. It supports some of the District's key health and education facilities as well as a large concentration of the District's knowledge-intensive jobs. A priority for the South District and Hurstville Strategic Centre is to increase the number of jobs in health and education and population servicing industries, which is particularly important in the context of the South District's declining industrial sector.

The South District Plan identifies that the district will be affected by significant demographic changes. It is anticipated that there will be an 85% increase in the proportion of people aged over 85 years. This represents the greatest growth of any age group. The rapidly ageing population will generate a demand for more diverse housing and aged care facilities located close to essential services.

NSW Ageing Strategy 2016 – 2020

The *NSW Ageing Strategy 2016 - 2020* (the Strategy) prepared by the NSW Department of Family and Community Services responds to the opportunities and challenges of the ageing population. It nominates five priority areas, including:

1. Health and wellbeing;
2. Working and retiring;
3. Housing choices;
4. Getting around; and
5. Inclusive communities.

Priority 3 Housing Choices is of key relevance to the proposal and relates to the need to ensure the ageing population has access to quality housing. It is supported by the following objective:

'Older people in NSW live in affordable, accessible, adaptable and stable housing'.

The Strategy notes that the ageing population has a preference for residing in their own communities where they are close to quality services, friends and relatives. To deliver on the above objective, the Strategy identifies that the NSW Government is committed to working with the businesses and the not-for-profit sector to improve access to a diversity of housing types for the ageing population.

3.2 Local Planning Context

Georges River LSPS 2040

The *Georges River Local Strategic Planning Statement (LSPS) 2040* (the LSPS) was formally adopted in March 2020. It will inform land use planning in the LGA over the next 20 years until 2040. It draws upon the priorities nominated by the Greater Sydney Region Plan – *A Metropolis of Three Cities* and the South District Plan and provides a framework for implementing a range of actions that respond to the local community's needs.

It identifies key opportunities, including the potential to locate medium to high density housing around transport nodes to promote accessibility and the opportunity to increase access to housing and jobs near new transport links.

Key challenges for the LGA include the prevailing mismatch between household composition and housing supply, and the barriers to facilitating housing diversity.

The LSPS identifies that the existing population comprises a greater proportion of older adults (75 years +). By 2036 the LSPS forecasts that there will be a greater share of older people relative to all other age groups. The LSPS notes that as the population increases, there has not been a corresponding increase in the delivery of community facilities and social infrastructure. The LSPS identifies that there is a pressing need to deliver social infrastructure, including services for the ageing population, ahead of population growth.

Georges River Community Strategic Plan 2018 – 2028

The *Georges River Community Strategy Plan 2018 – 2028* (CSP) is the result of extensive community consultation and is intended to inform the activities and design-making pertaining to the LGA's future development. It is predicated on six pillars or themes that relate to environment, accessible places and spaces, development, the economy and the community's needs.

With respect to the community's needs and the LGA's economy, it identifies the objectives for a harmonious and proud community with strong social services and the need to foster a diverse and productive economy. The objectives are supported by the findings of extensive community consultation, which confirm that 92% of respondents surveyed during the development of the CSP consider that the provision of local aged care facilities is a critical issue for Council.

The CSP nominates a number of strategies to delivery on its objectives. It identifies that instrumental to achieving a diverse and productive economy is the need to ensure critical infrastructure accompanies significant residential and employment growth. In light of this, seniors housing represents a form of critical social infrastructure. It will be required in order to respond to the growing ageing population's demand for housing and health care.

In addition, the CSP nominates a jobs target of 20,000 jobs by 2036 for the Hurstville Strategic Centre, with no net decrease in commercial, retail and industrial zoned/employment land capacity. The provision of seniors housing as sought by this Planning Proposal will ensure that land historically used for employment generating purposes is retained and redeveloped to support a greater number of jobs that will assist in meeting Council's jobs target.

Georges River Local Housing Strategy 2020

The *Georges River Local Housing Strategy 2020* (LHS) identifies the housing demand, gaps and issues, and establishes housing objectives to manage future growth over the next 20 years.

The population growth in the LGA is significantly lower than other LGAs within Greater Sydney, with a growth rate by 2036 of 0.9%. The population is ageing in the LGA and by 2036, there will be a significantly larger proportion of residents aged 65 years and older who will comprise 18% of the LGA's population, an increase from 14.9% in 2016. The increase in the proportion of older dependent residents will impact on housing requirements, such as an increase in demand for adaptable housing and aged care facilities. The provision of residential care facilities, such as the one subject to this Planning Proposal, will deliver housing to cater to the demand of older residents.

The LHS identifies an increase in population for all household types (couples with children, single parents families, couples without children, lone person households, etc.), resulting in a planning framework that needs to provide housing choice from adaptable housing to low density suburbs to family-friendly dwellings. The housing demand comes with the importance of bringing liveability in the LGA. As such, Georges River LGA focuses on providing greater access to green spaces, commercial areas with cafes, restaurants, shops and entertainment and in close proximity to transport.

The LHS encourages design excellence through the provision of housing choices in the LGA, to ensure new developments achieves high standards of architecture and urban design.

The 'Evidence base for the Local Housing Strategy' (the demand analysis) identifies a significant increase in adults aged 50-69 years between 2006 and 2016 and an *ageing population*.

The Planning Proposal is consistent with *Objective 4: Provide greater housing choice and diversity* of the Local Housing Strategy, in response to changing demographics and a mismatch between housing supply and demand. The *Greater Sydney Region Plan* and the *South District Plan* describe *Diversity* as a mix of dwelling types, a mix of sizes, universal design, seniors and aged care housing, student accommodation, group homes, and boarding houses.

Further, in response to the objectives of the LHS, the proposal aims to provide an opportunity to deliver an upgraded residential aged care facility to strengthen housing diversity and affordability in the area. The site is to be redeveloped for an aged care facility that meets contemporary standards, is of high-quality design and provides an array of ancillary uses that will improve the quality of life and care for occupants, therefore, being consistent with the LHS.

4 Current Planning Controls

4.1 Georges River LEP 2021

The GRLEP 2021 is the principal environmental planning instrument applying to the site. The key applicable Development Standards are outlined below.

4.1.1 Zoning

The site is zoned R2 Low Density Residential under the GRLEP 2021 (refer to **Figure 12**). Seniors housing is a use that is permitted with consent.



Figure 12 – Existing Zoning Map

Source: Mecone/GRLEP 2021

4.1.2 Height of Buildings

Under the GRLEP 2021 a maximum building height of 9m applies to the site, as shown in **Figure 13**.



Figure 13 – Existing Height of Buildings Development Standard Map

Source: Mecone/GRLEP 2021

4.1.3 Floor Space Ratio

Under the GRLEP 2021, a maximum Floor Space Ratio (FSR) of 0.55:1 applies to the site (refer to **Figure 14**).



Figure 14 – Existing Maximum FSR Development Standard Map
Source: Mecone/GRLEP 2021

4.1.4 Heritage Conservation

The GRLEP 2021 does not designate the site as being a heritage item or located within an HCA.

The site is however located in proximity to two heritage items, including 18 Millett Street known as 'Erina' (Item I122) and 29 Millett Street known as 'Alinda' (I123) (refer to **Figure 15**). Both items comprise detached residential dwellings.

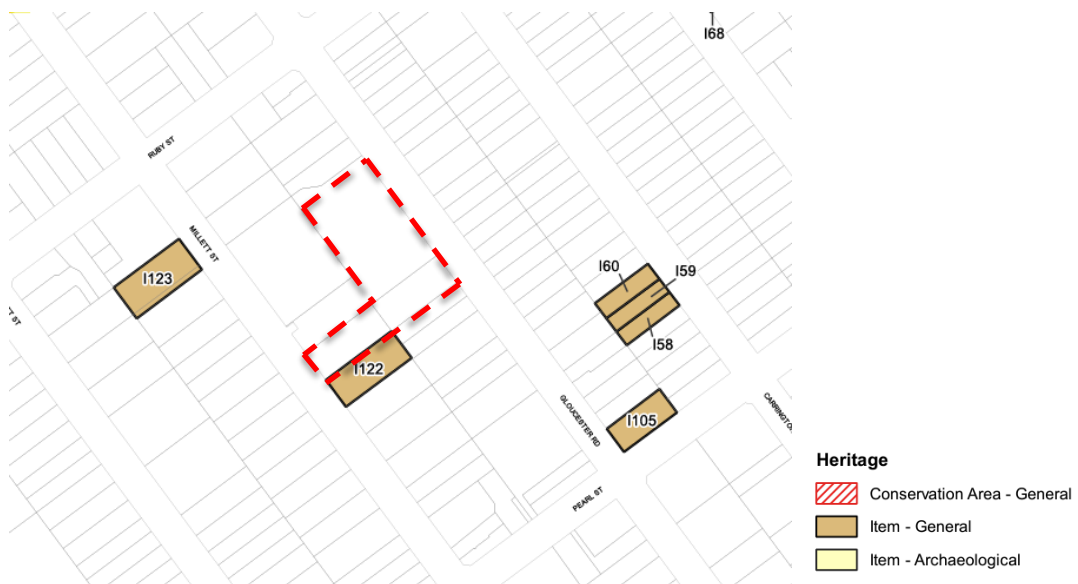


Figure 15 – Existing LEP Heritage Map
Source: Mecone/GRLEP 2021

5 Indicative Development Concept

5.1 Overview of Indicative Development Concept

This Planning Proposal is supported by an Indicative Architecture Concept that has been prepared following extensive consultation with Council and design testing.

The Indicative Architectural Concept demonstrates how the site may be developed within the parameters of the proposed LEP amendments. A detailed Development Application would be submitted following the finalisation of the Planning Proposal.

The Indicative Development Concept provides for the following:

- Demolition of existing structures and excavation to facilitate the delivery of a basement;
- Construction of a part 3 and 4 storey residential aged care facility with a GFA of 8,203m² (FSR 1.6:1) comprising:
 - 94 residential care beds;
 - 16 dementia beds;
 - Communal facilities;
 - Staff amenities;
 - Ancillary uses including a café, hairdresser, day spa, and function rooms;
- A basement with 41 vehicular spaces, comprising:
 - 20 staff spaces;
 - 11 residential spaces; and
 - 10 additional spaces above the minimum requirement.
- Provision of outdoor communal areas and landscaping.

The Indicative Architectural Concept is included at **Appendix 1**. A detailed numerical summary of the Indicative Development Concept is provided below:

Table 3. Numerical Overview of Indicative Development Concept	
Component	Proposed
Site area	5,267m ²
Maximum overall height (storeys)	<ul style="list-style-type: none"> • Gloucester Road: 4 storeys • Millet Street: 3 storeys
Maximum height	16.88m (including lift overrun)
Total Gross Floor Area	8,203m ²
Floor Space Ratio	1.6:1
Car Parking	41 spaces, including: <ul style="list-style-type: none"> - 20 staff; - 11 residential;

Table 3. Numerical Overview of Indicative Development Concept

	- 10 additional spaces; and
Solar Access	70% during Winter Solstice
Landscaping	1,500m ² / 28.5%
Deep Soil (minimum 6m wide)	1,200m ² / 22.7%

5.2 Building Envelope and Built Form

The envelope proposed as part of the Indicative Architectural Concept which informs the proposed LEP amendments is the consequence of iterative design testing. It has sought to minimise overshadowing impacts to the surrounding area and create a perceptible height that is keeping with the predominant three (3) storey height in the surrounds.

The proposed building envelope for the 'residential care facility' includes 12m, 14m and 16.9m building heights as illustrated in **Figure 16** below. The building envelope reaches a maximum height of 16.88m in the location of the lift core that occupies the western portion of the floorplate which is not perceptible from street level (refer to **Figure 17**). The envelope's building line predominantly reaches 14m (three (3) storeys). A fourth (4) storey is proposed in the central portion of the floorplate and reaches 16.33m. It is setback from the building line to minimise its visibility from the surrounds (refer to **Figure 18**).



Figure 16 - Maximum Building Height
Source: Mecone



Figure 17 – Proposed Massing from the Gloucester Road Frontage
Source: O'Neill Architecture



Figure 18 – Proposed Massing from the Millett Street Frontage
Source: O'Neill Architecture

The building footprint reflects the existing building footprint contained within the site; however, adopts an irregular 'W' shaped floorplate where it interfaces with Gloucester Road (refer to **Appendix 1**). The intent of the envelope configuration is to minimise the intensity of development across the site and provide opportunities for internal communal areas and landscaping.

5.3 Gross Floor Area

The Indicative Architectural Concept proposes a gross floor area (GFA) of 8,203m². Based on the site area of 5,267m², this represents an FSR of 1.56:1. However, given the conceptual nature of the proposal, a maximum FSR of 1.6:1 is desirable to allow for refinement of the architectural design at the detailed DA phase (refer to **Appendix 1** and **Appendix 2**).

The GFA relates to the provision of residential care bedrooms, staff facilities, and a range of complementary ancillary uses for occupants and staff.

The distribution of floor space per level is detailed in the table below.

Table 4. GFA Per Level and Uses		
Level	Uses	Gross Floor Area (m ²)
Basement	<ul style="list-style-type: none"> • Car Parking • Laundry Facilities • Kitchen • Workshop • Staff Room and Amenities 	622
Ground Level	<ul style="list-style-type: none"> • Bedrooms • Common Areas • Staff Facilities • Back of House Facilities • Nurses Office and Station • Medication Room • Servery • Reception • Manager's Office • Workshop 	2,418
Level One	<ul style="list-style-type: none"> • Bedrooms • Living / Dining Areas • Activity Room • Pedestrian Entrance • Common Areas • Staff Amenities 	2,465
Level Two	<ul style="list-style-type: none"> • Bedrooms • Staff Amenities • Servery • Storage • Utilities Room 	2,048
Level Three	<ul style="list-style-type: none"> • Hairdresser • Function / Cocktail Room 	650

Table 4. GFA Per Level and Uses		
	<ul style="list-style-type: none"> • Day Spa • Cinema • Private Dining • Family Room • Servery • Bar 	
Total		8,203m²

5.4 Communal Areas and Landscaping

The envelope is configured to allow for the provision of comprehensive landscaping, deep soil and outdoor communal areas.

Landscaping is accommodated within all setbacks at all aspects of the site. The total landscape area amounts to 1,500m², amounting to 28.5% of the site (refer to **Figure 19**). Of this landscaping 1,200m² comprises deep soil area, representing 22.7% of the site.

The proposal accommodates two communal areas located adjacent to Gloucester Road. The courtyard has a northerly aspect to maximise access to solar (refer to **Figure 19**). Each courtyard is capable of accommodating seating, sun shading and outdoor facilities. Approximately two thirds of each communal area is capable of supporting deep soil planting.

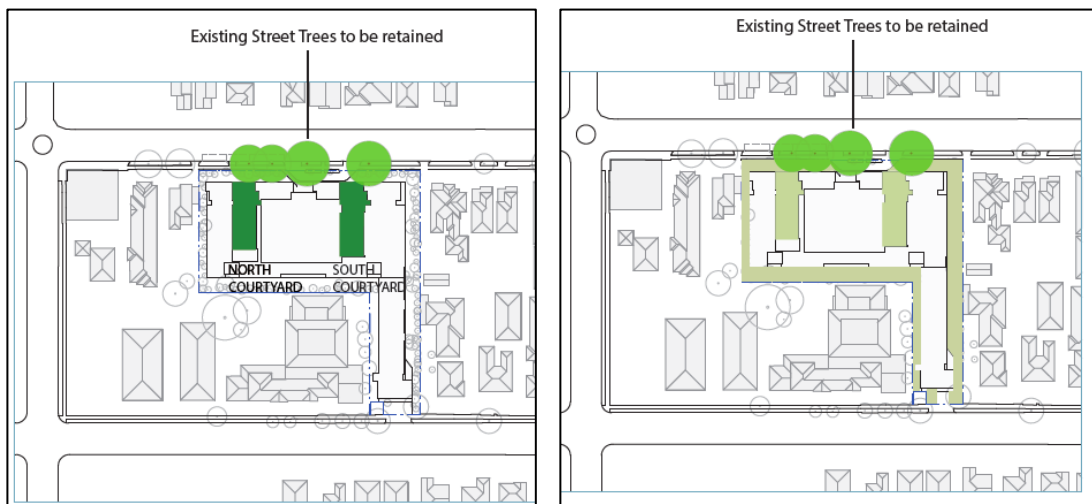


Figure 19 – Location of Communal Areas (left) and Landscaping (right)

Source: O'Neill Architecture

5.5 Access and Parking

The primary pedestrian entry is located centrally to the site adjacent to the Gloucester Road frontage (refer to **Figure 20**). It is complemented by a Porte Cochere which will function as a drop-off and pick-up area.

Vehicular ingress and egress are provided from Millett Street via a clearly defined ingress/egress driveway. The driveway permits entry to the basement which provides off-street parking for private vehicles, staff vehicles and service vehicles. Waste collection will also occur in the basement.

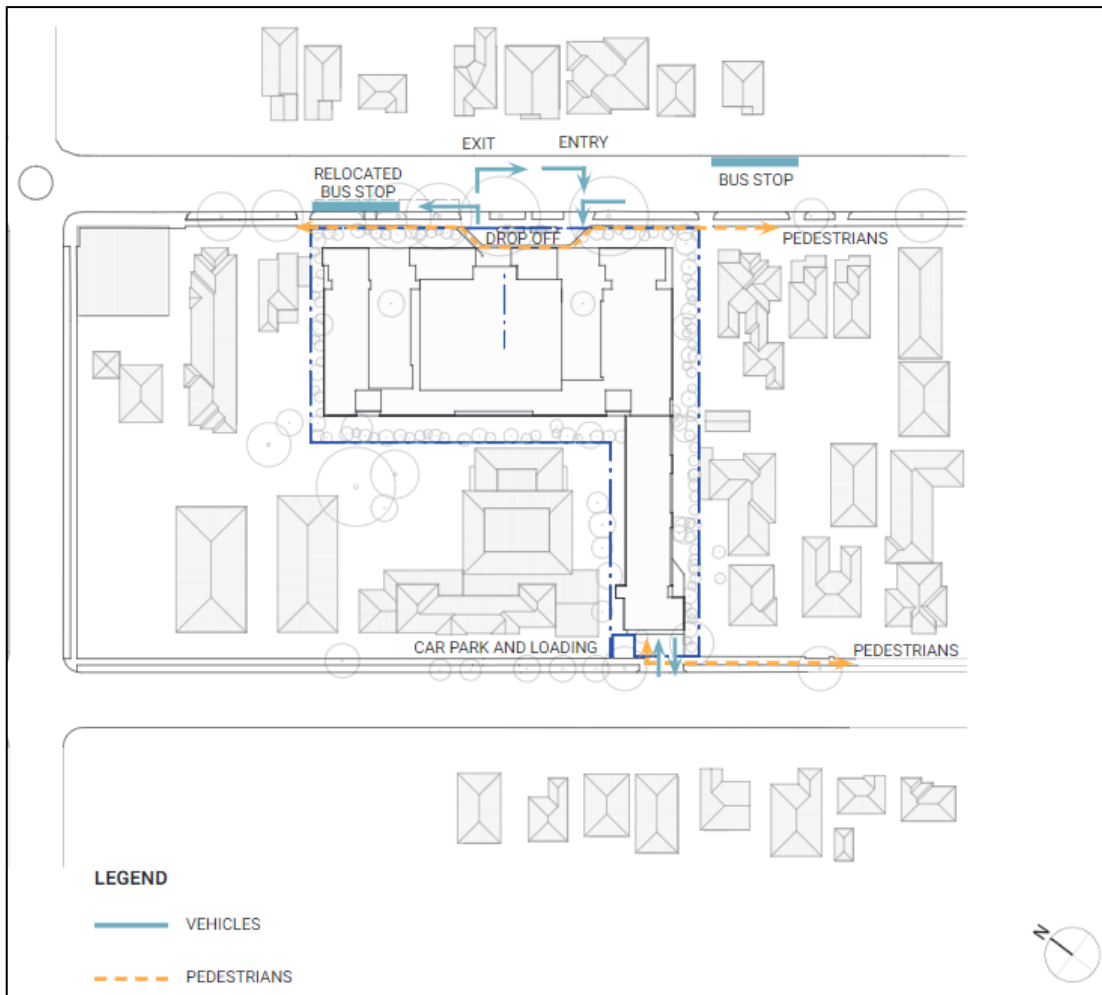


Figure 20 – Proposed Pedestrian and Vehicular Access Arrangements

Source: O'Neill Architecture

6 Planning Proposal Overview

6.1 Part 1- Objectives of the Proposed Instrument

The Planning Proposal represents a site specific amendment to the GRLEP 2021 to provide alternative FSR and Height of Buildings development standards and to enable a residential care facility as an additional local provision for the site at 53A-59A Gloucester Road, Hurstville.

The alternative controls for the use are a maximum FSR of 1.6:1, and maximum building heights of 12m, 14m and 16.9m.

The Planning Proposal is predicated on the following objectives and intended outcomes:

- To redevelop the site for a high quality aged care facility that provides state-of-the-art facilities that align with contemporary standards;
- To continue the site's historical legacy as an aged care facility and capitalise on the opportunity to replace the outdated building stock contained within the site;
- To minimise the perceived massing of the development by strategically distributing the mass across the site and adopting a mix of building heights;
- To limit overshadowing impacts to adjoining properties by concentrating the greatest bulk away from the street frontages;
- To provide a distribution of uses across the site that mitigate possible visual privacy impacts;
- To deliver centrally located and easily accessible communal areas that are internally orientated to protect occupant's privacy and enhance useability;
- To accommodate sensitive habitable space areas (such as dementia and residential bedrooms) in appropriate locations that promote amenity and prevent onlooking to surrounding developments;
- Provide a range of pedestrian connections that facilitate connectivity across the site and its internal communal areas;
- To facilitate a development outcome with areas sufficient to support comprehensive landscaping and tree planting;
- To contribute towards the achievement of Council's strategic planning objectives and to deliver on the directions supported by the regional strategic planning framework;
- Address the growing demand for high quality seniors housing operated by a reputable aged care provider; and
- Provide for an increased number of employment opportunities that will contribute to meeting the LGA's jobs targets.

Through the proposed amendments, the Planning Proposal will facilitate the delivery of a high quality seniors living accommodation and provide improved services that will better address the needs of the ageing community.

6.2 Part 2 – Explanation of Provisions

This Planning Proposal proposes to make the following amendments to the GRLEP 2021:

- Pursuant to Part 6 of the GRLEP 2021, introduce an additional local provision for the site at 53A-59A Gloucester Road, Hurstville to permit additional building height (ranging from 12m, 14m and 16.9m) and FSR (1.6:1) for the purpose of a 'residential care facility'.

6.2.1 Site Specific Provision

The Planning Proposal seeks to amend Part 6 of the GRLEP 2021 to insert the following site specific provision:

Part 6 Additional Local Provisions

6.17 Development on land at 53A-59A Gloucester Road, Hurstville

- (1) The objective of this clause is to enable a residential aged care facility with minimal adverse impacts.
- (2) This clause applies to land at 53A-59A Gloucester Road, Hurstville, being Lot 10, DP1077198 and Lot Y, DP411930.
- (3) Despite clause 4.3 (2), the maximum building height for development for the purposes of a residential aged care facility on land to which this clause applies may range from 12m, 14m and 16.9m as guided by the site-specific development control plan for the land.
- (4) Despite clause 4.4 (2), the maximum floor space ratio for development for the purposes of a residential aged care facility on land to which this clause applies is 1.6:1.

Note: While the GRLEP 2021 building height and FSR maps are not proposed to be amended, the building heights are proposed to be distributed within the site as illustrated in **Figure 1** below.



Figure 21 - Maximum Building Height

Source: Mecone

6.3 Site Specific Development Control Plan

The Proponent has prepared a Site Specific Development Control Plan (Site Specific DCP) to provide surety that the built form outcome reflects the requirements of the Indicative Architectural Concept and the Urban Design Principles included at **Appendix 1** and **Appendix 4**, respectively.

The Site Specific DCP is included at **Appendix 6**.

7 Part 3 - Strategic Justification

7.1.1 Section A – Need for the Proposal

Q1. Is the Planning Proposal a result of any strategic study or report?

The Planning Proposal is not the result of any specific strategy, study or report. The proposal has been initiated by the Proponent and is predicated on the need to revitalise the existing building stock contained within the site to deliver a high quality residential aged care facility that meets contemporary standards.

The Planning Proposal is the outcome of iterative design testing and seeks to provide a suitably scaled built form that is sympathetic to the character of the surrounds and delivers on the aspirations of the strategic planning framework.

However, the proposal is also strongly consistent with both local and state strategic studies such as the Regional Plan, South District Plan and Georges River Local Strategic Planning Statement (LSPS).

Q2. Is the Planning Proposal the best means of achieving the objectives and outcomes, or is there a better way?

The Planning Proposal represents the best mean of achieving the intended outcomes established in **Section 6.1**.

In preparing this Planning Proposal, alternative options have been explored. These are listed and discussed below:

- Option 1: Do nothing
- Option 2: Alternative designs
- Option 3: The proposal

Option 1: Do Nothing

Option 1 relates to the 'do nothing' option and entails leaving the site in its current undeveloped state. The existing building stock contained within the site is outdated and does not make a positive contribution to the streetscape. Further, its facilities are in need of replacement.

The proposal represents a significant upgrade of the existing aged care facility. Not undertaking the work would not be an appropriate outcome for a project of this nature, which seeks to provide new and improved facilities that will meet the needs of the ageing population.

Option 2: Alternative Designs

The proposal is the consequence of ongoing design development from a previous scheme prepared for the site that accompanied a former Planning Proposal. It has also been prepared following consultation with Council and with consideration given to the findings of an Independent Peer Review undertaken by Architectus as well as the Urban Design Principles prepared by Mecone to guide the redevelopment (refer to **Appendix 4**).

The previous scheme prepared for the site was discounted as it was considered to achieve a less optimal standard of amenity for both occupants and adjoining property owners. Specifically, the proposed distribution of bulk, including a four storey massing adjacent to either street frontage, provided overshadowing impacts to surrounding properties such as 20 and 24 Millet Street.

In light of this, the scheme was amended to provide an improved design outcome with reduced amenity impacts. In particular, greater consideration has been given to the massing, setbacks and orientation of apartments to maximise solar access, minimise the bulk of the development, limit overshadowing and to enhance building separation.

Option 3: Proposal

Option 3 involves undertaking the proposed development as outlined in this Planning Proposal.

The following key design amendments are proposed to achieve an improved design outcome relative to the scheme that accompanied the previous Planning Proposal:

- A reduced massing with a three storey street wall to either frontage to provide for an improved transition in scale;
- Concentration of the greatest bulk (i.e. the fourth storey) within the central portion of the site to reduce the perceived bulk of the development;
- Orientation of a greater proportion of residential care units to the north to maximise solar access; and
- Further refinement of the architectural expression to break up the façade.

In addition, the proposal is to be redeveloped in accordance with the Urban Design Principles included at **Appendix 4** and the site specific DCP at **Appendix 6**. The Urban Design Principles and site specific DCP will provide Council with surety that the redevelopment of the site in accordance with the requested amendments will provide suitably scaled form with minimal environmental impacts.

7.1.1 Section B – Relationship to strategic planning framework

Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

The Planning Proposal's consistency with the regional strategic planning framework is addressed in the table below.

Table 5. Consistency with Regional Strategic Planning Policies	
Regional Plan	Comment
<i>A Metropolis of Three Cities – Greater Sydney Region Plan</i>	In accordance with the Greater Sydney Region Plan (the Plan) the site is located within the Eastern Harbour City. Future demographic changes affecting the Eastern Harbour City include the growth of the ageing population, which is projected to increase from 18% to 21% by 2036. This represents the greatest growth of any population segment.

Table 5. Consistency with Regional Strategic Planning Policies

	<p>To support the needs of the growing population and guide the implementation of the Plan, it establishes a framework of 10 Directions centred around the themes of liveability, productivity and sustainability to guide the implementation of the Plan. The Planning Proposal aligns with the 10 Directions for the following reasons:</p> <ul style="list-style-type: none"> • A City Supported by Infrastructure - By providing additional aged care accommodation and jobs, the proposal will provide extra patronage to the existing public transport network. • A Collaborative City – The proposal represents a proponent initiated Planning Proposal that responds to the feedback received by Council following an extensive consultation process. • A City for People – The proposal will provide a state-of-the-art residential aged health care facility that will support the growing ageing population and therefore responds to the community's changing needs. • A City of Great Places – The proposal includes a range of communal areas that will foster interaction. The development facilitated by the proposal is considered to exhibit good design and has been designed to respond to the locality's identity. • A Well Connected City – The proposal will increase the supply of jobs and provide needed services in proximity to public transport. It will therefore support the emergence of a 30-minute city. • Jobs and Skills for the City – The proposal will increase the provision of jobs close to a Strategic Centre. It will increase investment in local health services and social infrastructure. • An Efficient City – The proposal is of high quality design. It is envisaged it will be constructed of durable materials and will adopt best practice sustainability principles.
<p><i>South District Plan</i></p>	<p>As noted above, the South District Plan guides the implementation of the Greater Sydney Region Plan at a district level. The proposal is consistent with the District Plan and the associated Planning Priorities of relevance to the proposal include:</p> <ul style="list-style-type: none"> • Planning Priority S3 - Providing services and social infrastructure to meet people's changing needs: The proposal will deliver a high quality residential aged care facility and in turn will address the demand for health

Table 5. Consistency with Regional Strategic Planning Policies

	<p>services and residential accommodation options for the growing ageing population.</p> <ul style="list-style-type: none"> • Planning Priority S4 – Fostering healthy, creative, culturally rich and socially connected communities: The proposal will foster a healthy and socially connected community by delivering health and care services that support the local community. The proposed aged care accommodation will increase the diversity of seniors housing options in the community and will allow prospective residents to live in proximity to friends and family. • Planning Priority S5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport: The proposal will provide residential aged care accommodation in proximity to public transport and services, particularly those concentrated within the nearby Hurstville Strategic Centre. • Planning Priority S6 – Creating and renewing great places and local centres, and respecting the District’s heritage: The development facilitated by the proposal will revitalise a site containing outdated building stock by delivering a high quality built form outcome with comprehensive landscaping that will positively contribute to the visual amenity of the streetscape. • Planning Priority S9 - Growing investment, business opportunities and jobs in strategic centres: The proposal will encourage job creation and investment in health services on a site that lies in direct proximity to the Hurstville Strategic Centre. • Planning Priority S12 – Delivering integrated land use and transport planning and a 30-minute city: The proposal will provide services and housing in proximity to transport and therefore will support the District Plan’s 30-minute city concept. • Planning Priority S17 – Reducing carbon emissions and managing energy, water and waste efficiently: The development facilitated by the Planning Proposal has the potential to adopt best practice sustainability measures that will assist in reducing carbon emissions.
<p><i>Future Transport Strategy 2056</i></p>	<p>The Planning Proposal is consistent with the <i>Future Transport Strategy 2056</i> in that it will locate needed health services and residential accommodation for the ageing population on a site that is highly accessible due to its proximity to transport and the Hurstville Strategic Centre.</p>
<p><i>NSW Ageing Strategy 2016 – 2020</i></p>	<p>The Planning Proposal is consistent with the <i>NSW Ageing Strategy 2016 – 2020</i> in that it will facilitate the provision of a new high quality</p>

Table 5. Consistency with Regional Strategic Planning Policies	
	<p>residential aged care facility that meets contemporary standards in a highly accessible location.</p> <p>The development facilitated by the Planning Proposal provides high quality communal areas and state-of-the-art facilities that will promote active and healthy lifestyles.</p>
<i>The NSW State Plan 2021</i>	<p><i>The NSW State Plan 2021</i> sets the strategic direction and goals for the NSW Government across a broad range of services and infrastructure. The current focus of the Government is outlined in 12 Premier's priorities and 18 State priorities.</p> <p>The Planning Proposal supports the Premier's priorities and aligns with the State priorities in that it will:</p> <ul style="list-style-type: none"> • Provide employment floor space facilitating jobs growth; • Provide social and health infrastructure; and • Create construction jobs.

Q4. Will the planning proposal give effect to a council's endorsed local strategic planning statement, or another endorsed local strategy or strategic plan?

Georges River Local Strategic Planning Statement 2040 (LSPS)

The LSPS identifies the need for community facilities and social infrastructure to address demographic changes, including the growth of the ageing population. The proposal is consistent with the LSPS as it will provide high quality social infrastructure in the form of a residential aged care facility.

The LSPS nominates a range of Planning Priorities to guide long term growth and deliver on the directions nominated by the South District Plan.

The relevant Planning Priorities and the proposal's consistency with each are detailed in the table below.

Table 6. Consistency with the Relevant LSPS Planning Priorities		
Planning Priority		Consistency
<i>P4</i>	<p>Collaboration supports innovation and delivers infrastructure, services and facilities.</p>	<p>The Planning Proposal is consistent with the Planning Priority as it is a consequence of consultation with Council and seeks to deliver needed health and social infrastructure to support the growing ageing population.</p> <p>The proposal will accommodate a range of ancillary services, including a hairdresser, café, day spa and function facilities. These facilities are complementary to the proposed use and will further assist in</p>

Table 6. Consistency with the Relevant LSPS Planning Priorities

		contributing needed services to the ageing population.
P7	Residential suburbs will be protected and retained unless identified as areas of change or investigation.	<p>The proposal is within the R2 Low Density Residential Zone; however, seeks to continue the site's historical use as an aged care facility and delivery new upgraded facilities.</p> <p>The design has been well considered to ensure acceptable impacts to the surrounding residential area. This is achieved through the provision of generous street and side setbacks; a reduced scale at the street frontages; and the strategic placement of the greatest density to the central portion of the site.</p>
P8	Place-based development, quality building design and public art deliver liveable places.	<p>The design adopts a place-based approach that considers the surrounding context and responds to the feedback provided by Council. The design is suitably scaled. Its architectural expression has been refined to ensure it seamlessly integrates with the surrounds.</p> <p>Comprehensive landscaping will be included and will positively contribute to the streetscape.</p>
P10	Homes are supported by safe, accessible, green, clean, creative and diverse facilities, services and spaces.	<p>The development as facilitated by the Planning Proposal will help to diversify the facilities in the area and improve access to safe and accessible health and aged care facilities.</p> <p>The proposal as envisaged by this Planning Proposal includes comprehensive landscaping that will promote a green outlook.</p>
P12	Land is appropriately zoned for ongoing employment growth.	<p>The Planning Proposal is consistent with the Planning Priority as it seeks to retain the site's employment generating use. It will intensify the development on the site while accommodating the approved beds; which in turn will support the provision of additional employment opportunities.</p>
P13	Planning, Collaboration and Investment delivers employment	<p>The Proponent has collaborated closely with Council to develop the scheme associated with the Planning Proposal. It</p>

Table 6. Consistency with the Relevant LSPS Planning Priorities

	<p>growth and attractive, lively, accessible and productive centres.</p>	<p>represents a Proponent initiated planning proposal that will support investment in health, social infrastructure and aged care accommodation that will also foster job creation. It will revitalise the site and facilitate a high quality built form outcome. For these reasons, the Planning Proposal will directly support the productivity of the Hurstville Centre.</p>
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The Georges River Community Strategic Plan 2018 – 2028 (CSP)

The Planning Proposal is consistent with the CSP and will contribute to its goals. A detailed discussion is provided in the table below.

Table 7. Consistency with the Relevant CSP Goals	
Goal	Consistency
Pillar 1 - A Protected Environment and Green Open Spaces	
1.1) Council's environmentally sustainable practices inspire everyone to protect and nurture the natural environment.	The proposal will not give rise to unacceptable environmental impacts and is capable of supporting Ecologically Sustainable Development (ESD) practices at the detailed design phase.
1.4) Local heritage is protected and promoted.	The site is not a heritage item nor is it located in a heritage conservation area. The proposal is suitably scaled and will have no impact on the heritage items located in the surrounds which are situated a significant distance from the site.
Pillar 2 – Quality, Well Planned Development	
2.1) Sustainable development delivers better amenity and liveability for the community and the environment.	The development facilitated by the Planning Proposal has the capacity to incorporate best practice sustainability measures.
Pillar 3 – Active and Accessible Places and Spaces	
3.2) Roads, footpaths and cycleways are safe, accessible and free of congestion.	The proposal will not produce unacceptable traffic related impacts. Further discussion is provided in the Traffic Impact Assessment at Appendix 3 .
3.4) Everyone has access to a range of active and passive recreation facilities.	The Planning Proposal will ensure future occupants have access to a range of outdoor and indoor communal activities as well as nearby open space area located in the vicinity of the site.
Pillar 4 – A Diverse and Productive Economy	
4.1) Local businesses are supported to help protect jobs and create employment opportunities.	The proposal will facilitate job creation and will bolster the local health services sector. It also seeks to provide a range of ancillary uses which will further facilitate job creation.
4.2) Outcomes from an Employment Lands Study ensure sufficient land is available for future employment growth .	The proposal seeks to retain and increase the supply of employment generating floor space across the site.

Table 7. Consistency with the Relevant CSP Goals	
4.3) <i>The ambitions for Hurstville and Kogarah as Strategic Centres are realised.</i>	The site is located in proximity to the Hurstville Strategic Centre. The proposal will deliver critical health and social infrastructure necessary to support projected population growth and the expanding ageing population.

The Georges River Local Housing Strategy (LHS) 2020

The Planning Proposal is consistent with the LHS and will contribute to its objectives. A detailed discussion is provided in the table below:

Table 8. Consistency with the Relevant LHS Objectives	
Objectives	Consistency
1. <i>Accommodate additional housing growth</i>	The Planning Proposal will ensure housing growth in the area by providing a residential care facility on site.
2. <i>Coordinate growth with infrastructure</i>	The site is located in proximity to public transport including Hurstville Station (950m) and Penshurst Station (1.3km). The site is located in proximity to major roads including Forest Road to the south-west, King George Road to the west.
3. <i>Provide affordable and inclusive housing</i>	The Planning Proposal recognises the importance of providing the local population with housing choices by providing housing that is more diverse and affordable, particularly for the elderly.
4. <i>Provide greater housing choice and diversity</i>	The Planning Proposal is consistent with this objective as it aims to provide housing choice and diversity in the area by providing a high-quality aged care facility.
5. <i>Have consistent LEP zoning and controls across the LGA</i>	The proposal is consistent with this objective. Residential aged care facility is a use that is permitted with development consent under the R2 Low Density Residential zone. The Planning Proposal aims to add a local provision for the site to enable the land to increase the height and FSR in order to achieve high-quality urban design outcome.
6. <i>Enhance and protect the local character</i>	The Planning Proposal will provide an improved facility and a higher quality built form outcome that is more compatible with the locality and does not

Table 8. Consistency with the Relevant LHS Objectives	
	give rise to any measurable environmental impacts to surrounding land uses.
7. Facilitate good design and sustainable development practice	The Planning Proposal is guided by a set of Urban Design Principles that have been prepared in close consultation with Council. These principles will ensure the proposal delivers a high quality outcome

Georges River Local Environmental Plan 2021

The Proposal's consistency with the relevant aims and objectives of the GRLEP 2021 are addressed in the table below.

Table 9. Assessment of Compliance Against GRLEP 2021 Aims and Objectives	
LEP Provisions	Comment
Aims	
aa) to protect and promote the use and development of land for arts and cultural activity, including music and other performance arts,	Not applicable
a) to provide for housing choices to cater for changing demographics and population needs,	The development facilitated by the Planning Proposal will increase the supply of residential aged care housing. The proposed use represents a continuation of the site's existing use but seeks to provide improved facilities and a higher quality built form outcome that is more compatible with the locality.
b) to provide for a range of business uses which promote employment and economic growth and contribute to the viability and vibrancy of centres	The Planning Proposal will keep promoting employment and economic growth as it is proposed to keep its existing use as a residential aged care facility.
c) to promote and facilitate an ecologically and economically sustainable and vegetated urban environment in which the needs and aspirations of the community are realised,	The proposal will have no impact on the vegetated urban environment located in the surrounds.
d) to provide for a range of recreational, social, cultural and community service opportunities to meet the needs of the Georges River community,	The proposal relates to the provision of high quality aged care facilities that directly respond to the needs of the ageing population. The proposal will directly enable a range of other uses and services as it seeks consent for a range of ancillary commercial uses (i.e. hairdressers, café

Table 9. Assessment of Compliance Against GRLEP 2021 Aims and Objectives

	etc.). These uses are internal to the development and are intended to be used by occupants of the facility.
e) to protect and preserve the natural, built, cultural and Aboriginal heritage of Georges River and to build upon and enhance the character of local areas	The proposal will have no impact on the natural, built and cultural and Aboriginal heritage in the area.
f) to promote a high standard of urban design and built form,	The development facilitated by the Planning Proposal is guided by a set of Urban Design Principles that have been prepared in close consultation with Council. These principles will ensure the proposal delivers a high quality outcome (refer to Appendix 4).
g) to protect, preserve and enhance the natural landform, vegetation and open space, especially foreshores or bushland, in order to maintain landscape amenity and public access and use,	The proposal relates to a site in a highly urbanised environment that will have no impact on bushland, habitats or environmentally sensitive land.
h) to protect, maintain and improve waterway health to achieve the environmental values of the community and uses for waterways,	Not applicable.
i) to facilitate infrastructure to support new development	Not applicable.
j) to promote and facilitate transit-oriented development that encourages the use of public transport, cycling and walking.	<p>The site is within walking distance of Hurstville Station (950m) and Penshurst Station (1.3km).</p> <p>The site is located in proximity to a number of bus routes including route 450 directly adjacent to the site on Gloucester Road which provides connections to Strathfield and Hurstville CBD.</p> <p>It is also located in proximity to a range of bus services along Forest Road and Bridge Street (M91, 940, 941, 943, 945) which provide connections to Parramatta, Bankstown, Punchbowl and Padstow.</p>
R2 Low Density Residential Zoning Objectives	
<ul style="list-style-type: none"> To provide for the housing needs of the community within a low density residential environment. 	The proposal will address the housing needs of the ageing population.

Table 9. Assessment of Compliance Against GRLEP 2021 Aims and Objectives

<ul style="list-style-type: none"> To enable other land uses that provide facilities or services to meet the day to day needs of residents. 	<p>The proposal is consistent with the objective as it will provide needed residential aged care accommodation options to address the needs of the ageing population.</p>
<ul style="list-style-type: none"> To promote a high standard of urban design and built form that enhances the local character of the suburb and achieves a high level of residential amenity. 	<p>The proposal relates to the provision of high quality aged care facilities that directly respond to the needs of the ageing population.</p>
<ul style="list-style-type: none"> To provide for housing within a landscaped setting that enhances the existing environmental character of the Georges River local government area. 	<p>Comprehensive landscaping and street tree planting is accommodated at the frontage within the setback to soften the appearance of the built form.</p>
<p>FSR Development Standard Objectives</p>	
<p>a) To ensure that buildings are compatible with the bulk and scale of the existing and desired future character of the locality,</p>	<p>In consultation with Council, the proposal has been reduced in scale. At either street frontage the proposal now presents as having a three storey street wall. The proposed scale needs to be understood in the context of the surrounding development, including the three (3) storey developments in the surrounds and Hurstville Private Hospital to the south which accommodates a building along the Gloucester Street frontage that registers as being three (3) storeys. In addition, high rise mixed use towers occupy the background which inform the visual setting of the development.</p> <p>The proposal massing strategy (i.e. to concentrate the greatest bulk centrally to the site) combined with the landscaping and adequate setbacks will ensure the proposal seamlessly integrates with the surrounds.</p>
<p>b) to ensure that development provides appropriate built form transition between new buildings and—</p> <ul style="list-style-type: none"> (i) adjoining land uses, or (ii) heritage items, heritage conservation areas or Aboriginal places of heritage significance, 	<p>The Planning Proposal seeks to govern the distribution of bulk across the site by prescribing varying height limits across the site. In addition, a site specific DCP has been prepared along with the Planning Proposal to ensure a suitable built form outcome at the detailed DA phase. The bulk is also guided by a set of Urban Design</p>

Table 9. Assessment of Compliance Against GRLEP 2021 Aims and Objectives

	<p>Principles that accompany the Planning Proposal.</p> <p>The proposal is not listed as a heritage item or within a heritage conservation area or Aboriginal significance.</p>
<p>c) to control development density and intensity of land use, taking into account—</p> <ul style="list-style-type: none"> (i) the environmental constraints and values of the site, including retaining the scenic, visual, and landscape qualities of the area, and (ii) the amenity of adjoining land and the public domain, and (iii) the availability of infrastructure to service the site, and (iv) the capacity of the road network to accommodate the vehicular and pedestrian traffic that a development will generate. 	<p>Due consideration has been given to ensuring the proposal integrates with the low scale residential development in the surrounds. Specifically:</p> <ul style="list-style-type: none"> • The upper level is recessed behind the building line and located centrally to the site; • The proposal has been reduced in scale to provide a three storey street wall to either frontage; • The façade adopts a strong horizontal articulation; and • The bulk of the building has been located towards the centre of the development. <p>The proposal will enable a range of other uses and services as it seeks consent for a range of ancillary commercial uses (i.e. hairdressers, café etc.). These uses are internal to the development and are intended to be used by occupants of the facility, and will not generate traffic.</p>
<p>Height Objectives</p>	
<p>a) To ensure that buildings are compatible with the height, bulk and scale of the existing and desired future character of the locality,</p>	<p>As noted above, the setbacks, massing strategy and landscaping will ensure the future development is compatible with the scale of the residential development in the immediate surrounds and the higher density development associated with Hurstville Private Hospital located further eastward.</p>
<p>b) To minimise the impact of overshadowing, visual impact, disruption of views and loss of privacy on adjoining properties and open space areas,</p>	<p>The proposal is not located in the immediate vicinity of parks and significant public areas.</p> <p>The principal habitable rooms and windows of the neighbouring residential developments are orientated from the site towards the south and north. In</p>

Table 9. Assessment of Compliance Against GRLEP 2021 Aims and Objectives

	<p>consequence, the proposed bulk will not give rise to private view loss impacts.</p> <p>The proposal is setback from the street frontage and respects the established building alignments along either street frontage. In turn, it will not impact views and vistas obtained from the streetscape.</p> <p>Further discussion regarding visual privacy and visual impacts is provided in Section 11.</p>
<p>c) To ensure an appropriate height transition between new buildings and—</p> <ul style="list-style-type: none"> (i) adjoining land uses, or (ii) heritage items, heritage conservation areas or Aboriginal places of heritage significance. 	<p>Refer above.</p>

Q5. Is the planning proposal consistent with applicable State Environmental Planning Policies?

The Planning Proposal would address and/or be consistent with all relevant Environmental Planning Policies (SEPPs). The following outlines the intent of the relevant SEPPs and consistency of the Planning Proposal.

Table 10. State Environmental Planning Policies

SEPP	Consistent	Comments
SEPP (Primary Production) 2021	N/A	The proposal is not for a primary production or rural development.
SEPP (Resilience and Hazards) 2021	N/A	The proposal is not located within a coastal management area and is not a hazardous or offensive development.
SEPP (Exempt and Complying Development) 2008	N/A	The Codes SEPP does not apply to the proposed development.
SEPP (Building Sustainability Index: BASIX) 2004		Will be addressed at the Development Application Phase.
SEPP No 65 – Design Quality of Residential Apartment Development	Consistent	While SEPP 65 is not strictly applicable to the proposed development, due to the nature and scale of the desired development outcome for the site, the ADG (Apartment Design Guide) and SEPP 65 design principles have been used as a guide in

Table 10. State Environmental Planning Policies

		determining appropriate setbacks and building separation.
Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment	Consistent	This Planning Proposal does not derogate or alter the application of the SEPP to future development.
SEPP (Housing) 2021	Consistent	<p>The delivery of seniors housing across the site is permissible with consent pursuant to Part 5 of the SEPP. Notwithstanding, seniors housing is permitted with consent in the R2 zone of the GRLEP 2021. Therefore, any future development application may be lodged under the GRLEP 2021 and not be constrained by the building height and FSR standards of the SEPP. This is discussed further at the end of this table.</p> <p>Further, the proposal is generally consistent with the site standards to be complied with as set out in clause 84 for the following reasons:</p> <ul style="list-style-type: none"> • Site Area: Consistent with the clause, the site's area exceeds 1,000sqm; • Site frontage: The site has a frontage of 88m (Gloucester Road) which exceeds the 20m minimum requirement;
SEPP (Planning Systems) 2021	N/A	The Planning Proposal is not a State Significant development.
SEPP (Biodiversity and Conservation) 2021	N/A	The site is not within a biodiversity conservation area.
SEPP (Resilience and Hazards) 2021	N/A	The site is not within a coastal zone
SEPP (Transport and Infrastructure) 2021	Consistent	<p>This SEPP is relevant to particular development categories. This Planning Proposal does not derogate or alter the application of the SEPP to future development.</p> <p>The full requirements of the SEPP will be considered at the detailed development application phase once the full design parameters of the proposal are known.</p>

Table 10. State Environmental Planning Policies		
SEPP (Industry and Employment) 2021	Consistent	Chapter 3 – Advertising and Signage, will apply to the Planning Proposal at a later date.
SEPP (Resources and Energy) 2021	N/A	The proposal is not a Resources or Energy development.
SEPP (Precincts - Eastern Harbour City) 2021	N/A	The site does not form part of any precinct in the Eastern Harbour City.
SEPP (Precincts - Western Parkland City) 2021	N/A	The site does not form part of any precinct in the Western Parkland City
SEPP (Precincts – Central River City) 2021	N/A	The site does not form part of any precinct in the Central River City
SEPP (Precincts – Regional) 2021	N/A	The site does not form part of any precinct in the Regional area.

The Housing SEPP 2021

The State Environmental Planning Policy (Housing) 2021 (Housing SEPP) provides provisions for housing for seniors and people with disability. The intended outcomes of the Planning Proposal are to provide high quality seniors living accommodation and provide improved services that will better address the needs of the ageing community. The Housing SEPP includes controls relating to seniors housing which apply to the proposal as discussed below.

- **Clause 8** (*Relationship with other environmental planning instruments*) provides that:

Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, **this Policy prevails to the extent of the inconsistency.**
- **Clause 81** (*Seniors housing permitted with consent*) provides that **development for the purposes of seniors housing may be carried out with development consent–**

(a) on land to which this Part applies, **or**

(b) on land on which development for the purposes of seniors housing is **permitted under another environmental planning instrument.**

As provided above, clause 81 of the Housing SEPP allows development for **seniors housing to be carried out under the SEPP or another EPI**, such as the Georges River LEP 2021. Accordingly, the DA would be lodged under the Georges River LEP 2021 as it would be permitted at the site and compliant with the relevant site-specific development standards under the LEP.

- **Clause 86 (2)** (*Development standards for seniors housing—Zones RE2, SP1, SP2, RU5 and R2*) provides that:

*Nothing in this section prevents a consent authority from granting development consent for development for the purposes of seniors housing **on land on which development for the purposes of seniors housing is permitted under another environmental planning instrument.***

A 'Residential care facility' is permissible under the R2 Low Density Residential zone of the GRLEP 2021. The Planning Proposal seeks an increase in the height and FSR at the subject site specifically linked to a 'residential care facility'. Accordingly, the applicant is seeking to utilise the proposed provisions under the GRLEP 2021 for a 'residential care facility' with the increased height and FSR, rather than the provisions of the Housing SEPP.

- For the reason outlined above, while the Housing SEPP prescribes differing building height and FSR development standards for seniors housing compared to those sought under this planning proposal, the development standards of the GRLEP 2021 may still prevail where a DA is lodged under the standards of the GRLEP 2021.

Notwithstanding the above, the Planning Proposal is consistent with the design principles in **clauses 99-105** of the Housing SEPP as guided by a set of Urban Design Principles that have been prepared in close consultation with Council and can be found at **Appendix 4**. In this respect, the Planning Proposal has been designed to provide the following outcomes that align with the design principles of the Housing SEPP including:

- To minimise the perceived massing of the development by strategically distributing the mass across the site and adopting a mix of building heights;
- To limit overshadowing impacts to adjoining properties by concentrating the greatest bulk away from the street frontages;
- To provide a distribution of uses across the site that mitigate possible visual privacy impacts;
- To deliver centrally located and easily accessible communal areas that are internally orientated to protect occupant's privacy and enhance useability;
- To accommodate sensitive habitable space areas (such as dementia and residential bedrooms) in appropriate locations that promote amenity and prevent onlooking to surrounding developments;
- Provide a range of pedestrian connections that facilitate connectivity across the site and its internal communal areas; and
- To facilitate a development outcome with areas sufficient to support comprehensive landscaping and tree planting.

Further, the non-discretionary standards under **clause 107** of the Housing SEPP, not relating to building height and FSR, are capable of being satisfied within the Planning Proposal scheme.

Q6. Is the planning proposal consistent with applicable Ministerial Directions under Section 9.1 of the Act

The Planning Proposal is consistent with all relevant section 9.1 Directions. The assessment of these is outlined in the table below.

Table 11. Section 9.1 Ministerial Directions					
Direction	Yes	No	NA	Comments	
1. Planning Systems					
1.1	Implementation of Regional Plans	✓			This Planning Proposal is consistent with the Regional and District Plan.
1.2	Development of Aboriginal Land Council Land			✓	
1.3	Approval and Referral Requirements			✓	No new concurrence provisions are required.
1.4	Site Specific Provisions	✓			The objective of this direction is to discourage unnecessarily restrictive site specific planning controls. In contrast, the proposed provisions seek to provide a specific incentive only for 'residential care facility', not other permissible uses. A more general control applying to all permissible uses would remove the incentive for 'residential care facility'.
1.5	Parramatta Road Corridor Urban Transformation Strategy			✓	
1.6	Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan			✓	
1.7	Implementation of Greater Parramatta			✓	

Table 11. Section 9.1 Ministerial Directions

	Priority Growth Area Interim Land Use and Infrastructure Implementation Plan				
1.8	Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation			✓	
1.9	Implementation of Glenfield to Macarthur Urban Renewal Corridor			✓	
1.10	Implementation of the Western Sydney Aerotropolis Plan			✓	
1.11	Implementation of Bayside West Precincts 2036 Plan			✓	
1.12	Implementation of Planning Principles for the Cooks Cove Precinct			✓	
1.13	Implementation of St Leonards and Crows Nest 2036 Plan			✓	
1.14	Implementation of Greater Macarthur 2040			✓	
1.15	Implementation of the Pyrmont Peninsula Place Strategy			✓	
1.16	North West Rail Link Corridor Strategy			✓	
1.17	Implementation of the Bays West Place Strategy			✓	

Table 11. Section 9.1 Ministerial Directions

3. Biodiversity and Conservation					
3.1	Conservation Zones	✓			The proposal does not seek to alter the existing environmental protection standards that apply to the subject site.
3.2	Heritage Conservation		✓		The site is not a heritage item nor is it located in a heritage conservation area. The proposal is suitably scaled and will have no impact on the heritage items located in the surrounds which are situated a significant distance from the site. Further matters associated with heritage impacts can be addressed as part of any future development application.
3.3	Sydney Drinking Water Catchments			✓	
3.4	Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs			✓	
3.5	Recreation Vehicle Areas			✓	
4. Resilience and Hazards					
4.1	Flooding			✓	The site is not identified by Council's Overland Flow Flood Study mapping as being affected by flooding.
4.2	Coastal Management			✓	
4.3	Planning for Bushfire Protection			✓	The site is not identified on Council's Bushfire Prone Land mapping.
4.4	Remediation of Contaminated Land			✓	

Table 11. Section 9.1 Ministerial Directions

4.5	Acid Sulfate Soils			✓	The GRLEP 2021 does not identify the site as containing acid sulfate soils.
4.6	Mine Subsidence and Unstable Land			✓	The site is not identified to be affected by mine subsidence or unstable land.
5 Transport and Infrastructure					
5.1	Integrated Land Use Transport	✓			<p>The proposal is adequately serviced by public transport consisting of bus services and heavy rail. It will therefore increase the supply of jobs and housing in a location well serviced by public transport.</p> <p>The traffic generation associated with the proposal is considered to be acceptable and will not impact the surrounding road network (refer to Appendix 3).</p>
5.2	Reserving Land for Public Purposes			✓	
5.3	Development Near Regulated Airports and Defence Airfields			✓	
5.4	Shooting Ranges			✓	
6 Housing					
6.1	Residential Zones			✓	The Planning Proposal is to permit an additional local provision specifically for a residential aged care facility at the subject site, which is within the Low Density Residential land zone.
6.2	Caravan Parks and Manufactured Home Estates			✓	The Planning Proposal does not relate to Caravan Parks or Manufactures Home Estates.

Table 11. Section 9.1 Ministerial Directions

7. Industry and Employment					
7.1	Business and Industrial Zones			✓	The Planning Proposal is not within the business or industrial zones.
7.2	Reduction in non-hosted short-term rental accommodation period			✓	
7.3	Commercial and Retail Development along the Pacific Highway, North Coast			✓	
8. Resources and Energy					
8.1	Mining, Petroleum Production and Extractive Industries			✓	
9. Primary Production					
9.1	Rural Zones			✓	
9.2	Rural Lands			✓	
9.3	Oyster Aquaculture			✓	
9.4	Farmland of State and Regional Significance on the NSW Far North Coast			✓	

7.1.2 Section C – Environmental, social and economic impact

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

No.

The Planning Proposal relates to a site in a highly urbanised environment. It does not pertain to environmental sensitive land and is not known to contain significant flora or fauna. The Planning Proposal will not impact critical habitat or threatened species, populations or ecological communities or other habitats. If required, these matters can be appropriately addressed at the DA stage.

Q8. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

No.

The proposed use comprising a residential aged care facility is consistent with the site's existing use. Due consideration has been given to ensuring the proposed mass and scale does not give rise to adverse environmental impacts. Further discussion is provided in **Section 11**.

Q9. Has the planning proposal adequately addressed any social and economic effects?

The proposed development will provide a range of positive social and economic benefits for the local area. Specifically, the proposal will:

- Provide additional employment opportunities on a site in proximity to the Hurstville Strategic Centre;
- Provide improved healthcare services and quality care for residents;
- Replace the outdated building stock contained within the site with a high quality built form outcome;
- Provide an improved interface at the street frontages;
- Contribute to the site's revitalisation by delivering a design that is sympathetic to the surrounding built form and protects the amenity of surrounding properties;
- Provide an intensity of land use commensurate with the growth anticipated for the area and the site's proximity to a Strategic Centre;
- Facilitate a density for the site that can accommodate the approved number of residential aged care units across the site in order to respond to demographic changes associated with the growing ageing population; and
- Increase employment opportunities both during the construction phase and operational phase.

7.1.3 Section D – State and Commonwealth Interests

Q10. Is there adequate public infrastructure for the Planning Proposal?

Yes.

The site is located in proximity to the Hurstville Strategic Centre and is therefore afforded ample access to a range of existing facilities and services. As outlined in **Section 2**, the site is in walking distance of two railway stations, bus services, Hurstville Private Hospital, open space and sporting facilities.

Q11. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

The views of State and Commonwealth public authorities will be known during the community consultation.

8 Part 4 – Mapping

This Planning Proposal does not seek to amend the current maps of the GRLEP 2021. The FSR and Height uplifts associated with the additional 'residential care facility' land use at the subject site is proposed to be enforced through a local provision and is to be determined by the Parliamentary Counsel. The proposed height distribution on the site is illustrated at **Figure 21** and is included in the site specific DCP.

9 Part 5 – Community Consultation

The Planning Proposal will be placed on public exhibition in accordance with the conditions of the Gateway Determination, issued on 28 February 2022.

Any community consultation will be conducted in accordance with Section 3.34 of the EP&A Act and Local Environmental Plan Making Guideline, December 2021. This is likely to involve notification of the proposal:

- Advertisement in a local newspaper;
- Notification letters to relevant State Agencies and other authorities nominated by the DPE;
- Notification (via letter) to land holders of properties within and adjoining the future health precinct;
- Exhibition of the Planning Proposal on Council's website and at relevant Customer Service Centres; and
- Undertaking of any other consultation methods appropriate for the proposal.

A site specific DCP for the site would also be exhibited in accordance with Council's Community Engagement Strategy 2018-2028.

10 Part 6 – Project Timeline

A primary goal of the plan making process is to reduce the overall time taken to gazette LEPs. In order to meet this goal, the inclusion of a project timeline with the Planning Proposal will provide a mechanism to monitor the progress of the Planning Proposal through the plan making process.

The table below provides the project timeline anticipated for the subject Planning Proposal, which is proportionate to the nature and scale of the Planning Proposal.

Table 12. Project Timeline	
Milestone	Date
Submission of the Planning Proposal	November 2017
Planning Proposal Reported to Council	October 2021
Referral to Minister for Gateway Determination	November 2021
Anticipated commencement date (date of Gateway determination)	February 2022
Commencement and completion dates for public exhibition period	May 2022
Timeframe for government agency consultation (pre and post exhibition as required by Gateway Determination)	May/June 2022
Timeframe for consideration of submissions	July/August 2022
Consideration of PP by LPP	September 2022
Consideration of PP by Environmental Planning Committee and Council	October 2022
Date of submission to the DPE to finalise the LEP	November 2022
Anticipated date RPA will make the plan (if delegated) or Anticipated date RPA will forward to the department for notification	Post November 2022
Anticipated date for publishing of the plan	Post November 2022

11 Environmental Assessment

This section provides an environmental assessment of the development facilitated by the Planning Proposal.

To support the Planning Proposal, O'Neill Architecture have prepared an Indicative Architectural Design Concept to test and demonstrate the development that could potentially be delivered within the parameters of the requested amendments.

With reference to the Indicative Architectural Design Concept, the environmental impacts associated with the Planning Proposal are addressed below.

11.1 Built Form

11.1.1 Massing and Scale

The Planning Proposal will facilitate the delivery of a building with a perceptible height of three (3) storeys and a maximum height of four (4) storeys (refer to **Figures 22 – 23**). This results in a maximum height of 16.88m in the location of the western lift core; a height of 16.13m at the fourth storey positioned centrally to the floorplate; and a predominant height of 14m for the remainder of the building (refer to **Appendix 1**).

In light of this, the indicative massing strategy consists of concentrating the greatest bulk within the site's centre and a reduced scale at the street frontages and side boundaries where the site interfaces with the residential development.

The indicative massing strategy is predicated on the need to achieve an appropriate transition in scale to the low density residential uses in the surrounds and needs to be understood in the context of the density in the surrounds (refer to **Figure 23**). The predominant building typology to the south west along Millett Street consists of three (3) storey residential flat buildings. The development to the east fronting Gloucester Road relates to Hurstville Private Hospital which has a perceptible height of three (3) stories when viewed from the street. In this context, the proposed three (3) storey street wall height provides an appropriate urban design response and will sit comfortably in the streetscape.

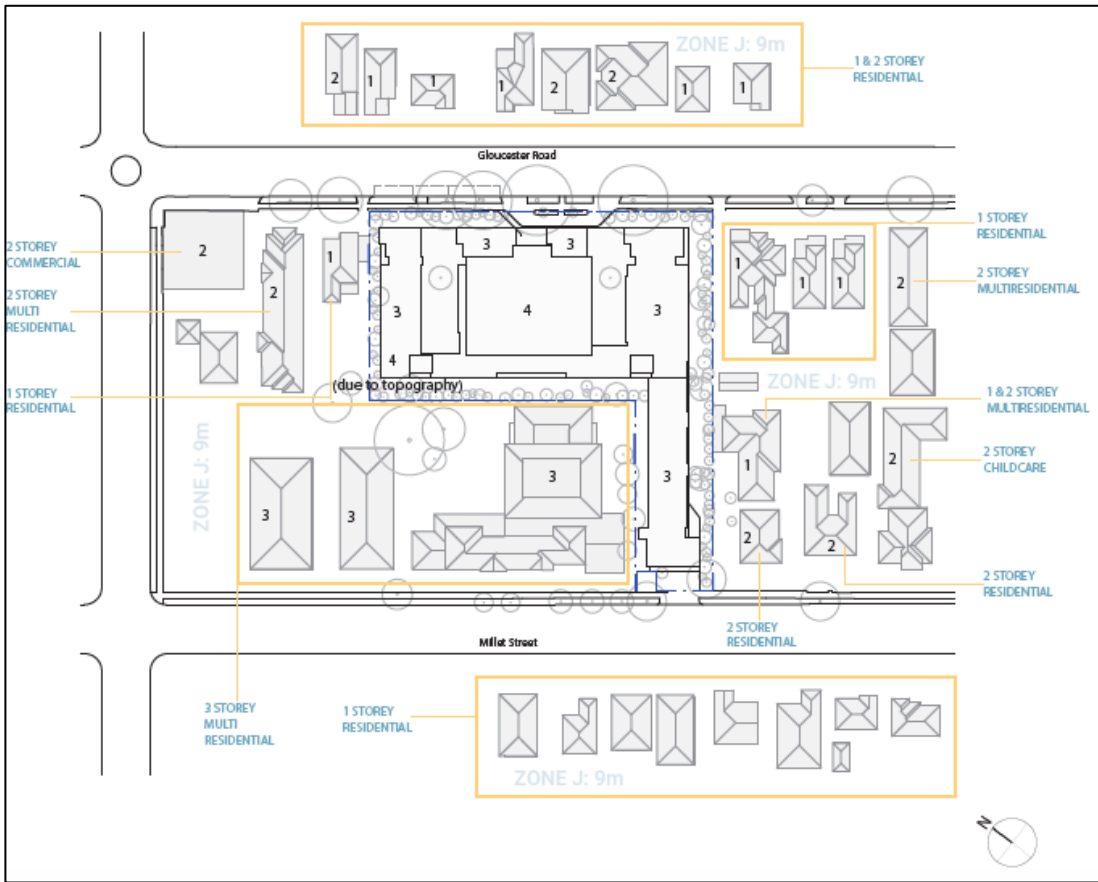


Figure 22 – Proposed and surrounding Storey Heights
 Source: O'Neill Architecture

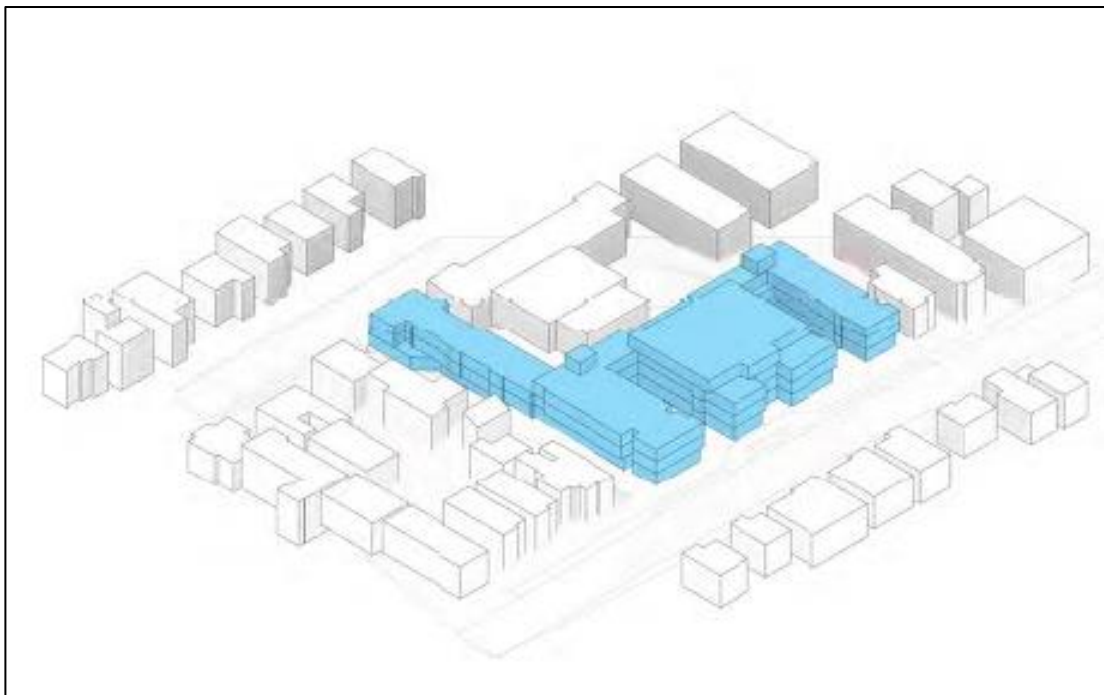


Figure 23 – Proposed Massing looking South West
 Source: O'Neill Architecture

To reduce the perceived massing of the development, the envelope has been modulated and broken down into distinct elements. Deep recesses are incorporated to limit the extent of the development's site coverage and provide opportunities for external communal areas. At the north-eastern elevation fronting Gloucester Street, the proposal adopts a reduced height of three storeys and the façade incorporates recesses. The recesses combined with the strong horizontal articulation and varied materiality will reduce the perceived scale of the development and contribute visual interest to the streetscape.

11.1.2 Setbacks and Building Separation

The Indicative Architectural Concept demonstrates that the proposed development facilitated by the Planning Proposal has the potential to provide adequate building separation, a high level of visual and acoustic privacy along with opportunities for landscaping and deep soil zones.

Street and Side Setbacks

The setbacks proposed by the Indicative Architectural Concept have been designed to respond to the predominant rear and front building alignments established by neighbouring properties and to comply with the requirements of the Georges River DCP (GRDCP) 2021 for the R2 Low Density Residential zone. The DCP requires a minimum 1.2m side setback and a minimum rear setback of 6m.

Whilst not directly applicable to the development, consideration has also been given to the building separation requirements of the Apartment Design Guide (ADG). The proposal generally complies with the ADG's numerical requirements for building separation. Where variations are proposed, appropriate privacy mitigation measures are included to ensure consistency with the associated design guidance. In consequence, the siting of the proposal will not compromise the future development potential of adjoining sites.

The proposed setbacks and the location of uses are illustrated in the figures below and are as follows:

- North-east (Gloucester Road): 4.5m;
- South-west (Millett Street): 6m
- South-east: 6m
- North-west: 3m

The north-eastern and south-western setbacks align with the established building lines along Gloucester Road and Millett Street and comply with the minimum setback requirements of the DCP. The setbacks allow for the provision of comprehensive landscaping that will soften the appearance of the built form. As the built form along either street frontage does not encroach forward of the adjoining developments, views and vistas down either street frontage will be maintained.

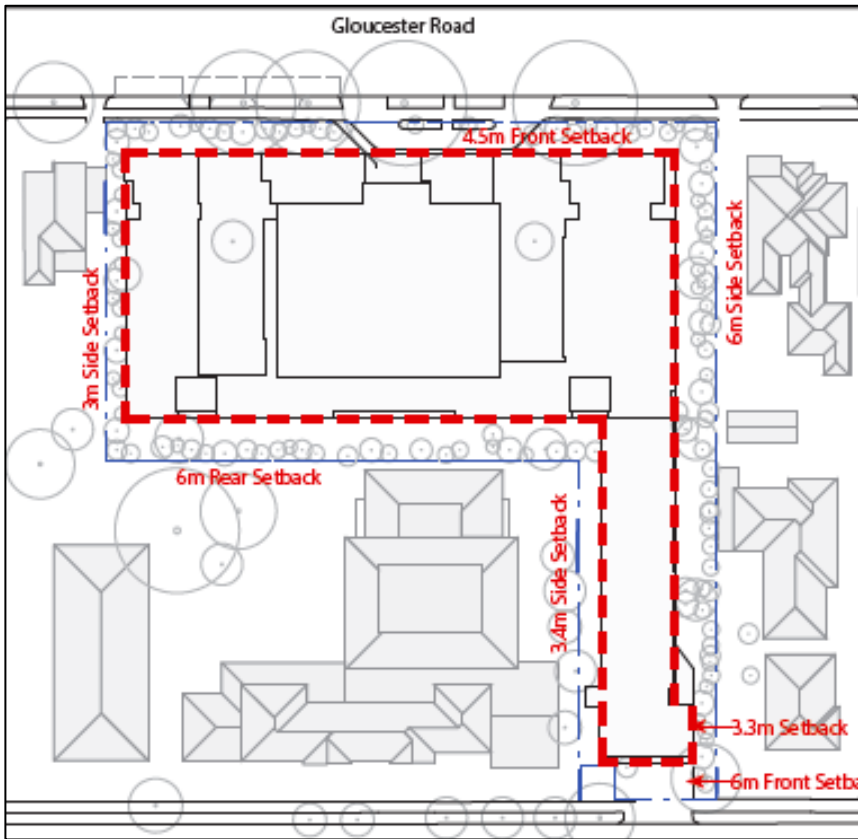


Figure 24 – Proposed Setbacks and Building Separation

Source: O'Neill Architecture

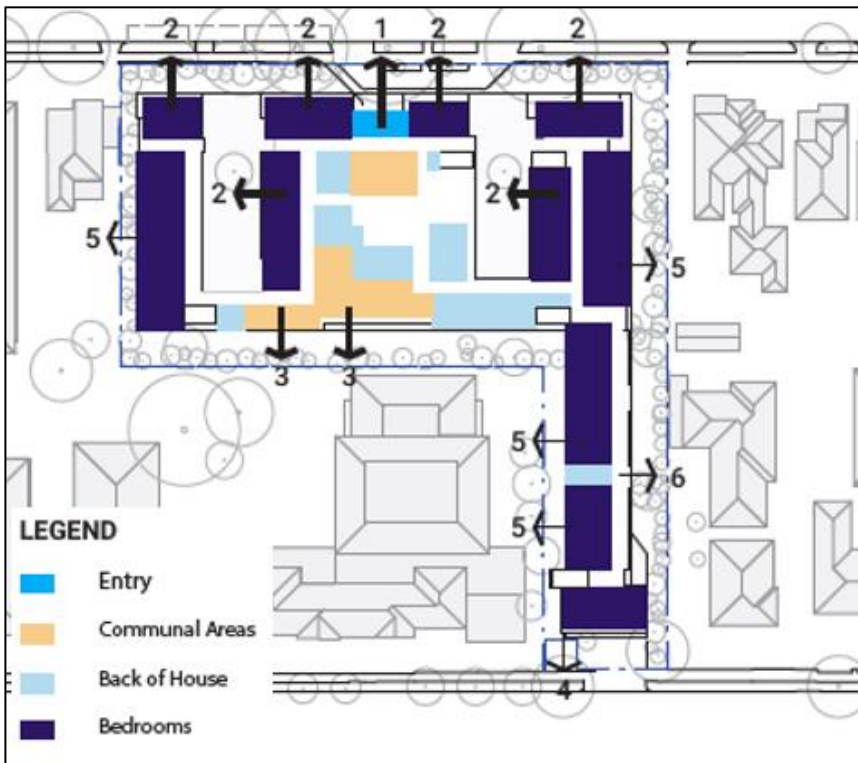


Figure 25 – Proposed Location of Uses

Source: O'Neill Architecture

The site interfaces with low density residential dwellings to the south-east and south-west which provide varying side setbacks to the site. Most dwellings are setback from the site's boundaries. Where a nil setback is provided, it relates to a limited portion of the dwelling's envelope (refer to **Figures 24 - 25**).

These dwellings are orientated towards the north and south away from the development. In consequence, the windows to principal habitable rooms are predominantly orientated away from the subject site.

The proposal provides a 3m setback to its north-western boundary and accommodates residential care units in this portion of the envelope (refer to **Figure 26**). At this interface, the majority of the proposal's envelope is offset from the residential dwelling positioned to the immediate west. This setback is considered appropriate as additional privacy treatment and landscaping are proposed to the boundary of the site to maximise privacy and provide visual relief. This is further illustrated in **Figure 27** below and supported by a landscape statement provided in **Appendix 6**.

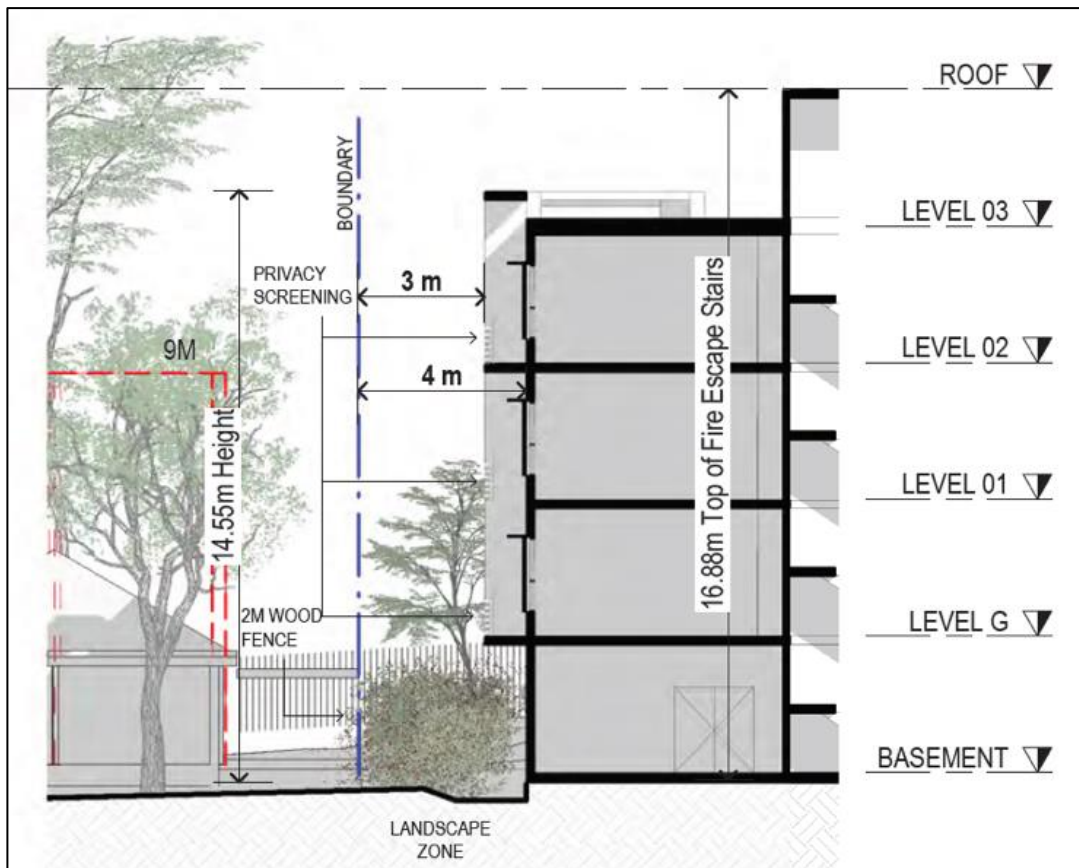


Figure 26 – Western Boundary Section Plan

Source: O'Neill Architecture

The proposal provides a 6m setback to the eastern boundary. The neighbouring dwellings to the north east at 51 Gloucester Road and south east at 20 Millett Street are generally setback from the common boundary. However, the dwelling to the south east provides a nil setback for a portion of its building length (refer to **Figure 27**).

The generous 6m setback will protect the future redevelopment potential of these properties and will ensure amenity is not borrowed from these sites.

Whilst not strictly applicable to the subject site, the proposed 6m setback complies with the building separation requirements nominated by the Apartment Design Guide (ADG) and is considered adequate to prevent onlooking. It also provides the opportunity for screen planting that will prevent onlooking. As shown in **Figure 27**, privacy screening consisting of vertical fins and blank walls are incorporated on the eastern elevation where the proposal interfaces with the dwelling to the south east that provides a nil setback. Combined, the compliant setback, landscaping, blank walls and privacy screening will prevent visual privacy impacts.

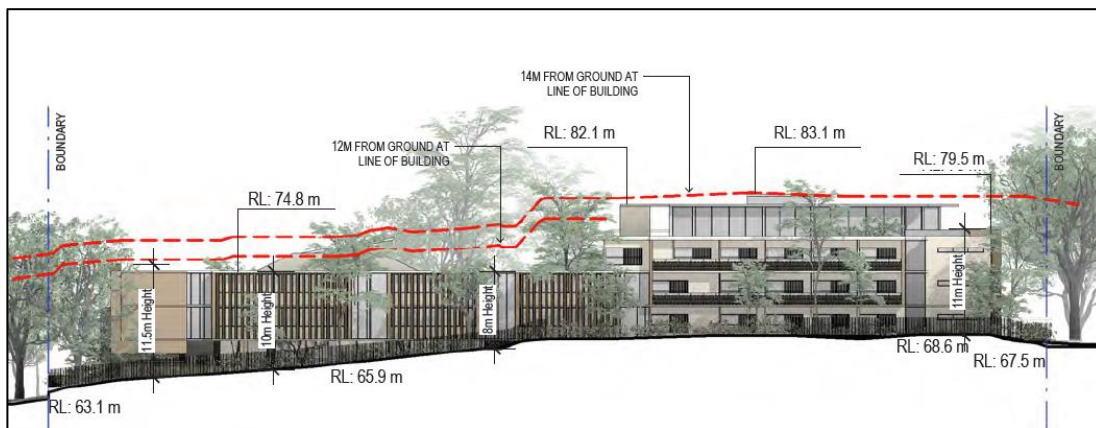


Figure 27 – Eastern Façade Articulation and Privacy Screening

Source: O'Neill Architecture

Internal Building Separation

The proposal adopts an irregular building footprint which requires that consideration be given to internal building separation and visual privacy. Internal floor planning, including the strategic placement of bedrooms, non-habitable spaces and corridors has been used to prevent opportunities for onlooking between habitable rooms.

As shown at **Appendix A** and in **Figure 27**, bedrooms are largely offset from one another at all levels. Further, corridors are concentrated along the building's perimeter to prevent onlooking to habitable rooms. In turn, visual privacy impacts will be prevented.

11.1.3 Overshadowing

An Overshadowing Analysis demonstrates that the development facilitated by the Planning Proposal will provide minimal and compliant overshadowing impacts during the Winter Solstice, which represents the worst-case scenario.

The Overshadowing Analysis confirms that the shadow cast during the morning period predominantly affects the rear communal open space area of the adjacent property to the immediate south (refer to **Figure 28**). Between 9am and 12pm the shadow affects its northern elevation; however, the majority of this elevation is devoid of windows and consists of a blank wall.

During the afternoon period, the shadow affects the dwellings to the immediate east that front Gloucester Road and Millet Street. Whilst the western elevation of these developments accommodates windows, they predominantly relate to secondary habitable space areas, with each development's primary windows orientated towards the north and south (refer to **Figure 28**). In addition, these properties continue to receive a minimum of two hours solar between 9am and 3pm, as addressed at **Appendix 1**.

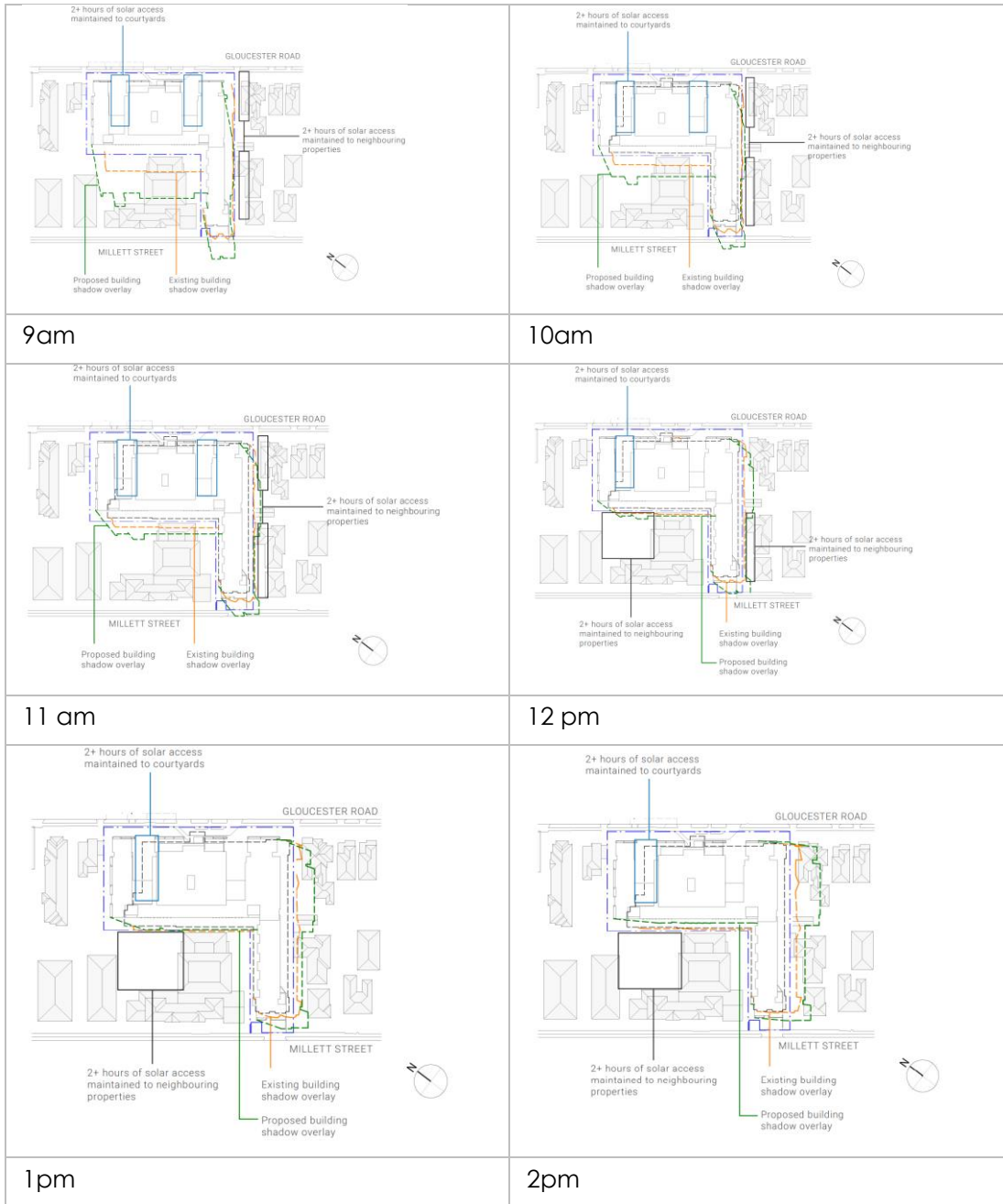


Figure 28 – Shadow Impacts During the Winter Solstice

Source: O'Neill Architecture

The shadow diagrams also provide a comparison of the existing building and proposed building overshadowing effects. While the proposed building envelope does cast a greater shadow compared to the existing, as discussed below, the surrounding properties are still capable of achieving a compliant solar access outcome.

The shadow analysis confirms that the surrounding properties will continue to receive adequate solar access. Specifically:

- The northern windows of the neighbouring apartment building to the south will achieve 3 hours solar access;
- The north eastern property at 51 Gloucester Road will receive 2 hours solar access between 10am and 12pm;
- The south eastern property located at 20 Millett Street will receive 2 hours solar access between 12pm and 1pm; and
- The southern located residential apartment building will continue to receive 2 hours solar. It is noted its northern elevation largely comprises a blank wall.

11.1.4 Solar Access

The proposal has been designed to facilitate adequate daylight to residential care units and principal internal communal space areas.

The Solar Analysis included at **Appendix 1** confirms that more than 70% of resident bedrooms achieve 2 hours solar access in mid winter and less than 15% of resident bedrooms achieve no direct solar access during the same period.

The proposed internal courtyards are also able to receive 2 hours solar access during the Winter Solstice.

11.1.5 Visual Impacts

Views of the proposal are largely obtained from Gloucester Street and Millett Street. The siting of the envelope and the massing strategy will not result in visual impacts. The proposed fourth (4) storey is considerably setback above the street frontage heights. In turn, at both frontages the proposal presents as having a three (3) storey street wall.





Figure 29 – Proposal from Millett Street (Above) and Gloucester Road (Below)
Source: O'Neill Architecture

The proposal as envisaged by the Indicative Architectural Concept adopts a recessive colour pallet. At either street frontage, the envelope is also partially concealed by landscaping and street tree planting. In turn, the proposal will not dominate the streetscape and will integrate with the surrounding built form.

The proposal does not protrude forward of the existing building line provided along Gloucester Road and Millett Street. In turn, the envelope will not reduce views and vistas obtained along either street frontage.

11.2 Traffic Impacts

A Traffic Impact Assessment has been prepared by JMT Consulting and is included at **Appendix 3**. The report provides an assessment of the vehicle and pedestrian access arrangements, the traffic generation associated with the proposal and a statutory parking assessment.

11.2.1 Basement Access Arrangements

The proposed access arrangements consist of a vehicular ingress/egress access point from Millett Street. The report confirms that the access point complies with the relevant Australian Standards.

The detailed layout of the basement car park will be confirmed at the Development Application phase. Notwithstanding, the basement is sufficient in size and configuration to allow for the provision of an adequate quantity of car parking that complies with the necessary standards and allows for adequate manoeuvrability.

11.2.2 Provision of Parking

The Indicative Architectural Concept is capable of providing parking in accordance with the requirements of the Housing SEPP under Clause 107 (2)(h-j).

Based on the proposed quantity of 110 beds and 40 staff members, the proposal is required to accommodate a minimum of 28 vehicle spaces, consisting of 7.3 spaces for residents 20 spaces for staff and 1 space for ambulance parking. The proposal seeks to provide 41 spaces which can readily be accommodated in the basement and is consistent with the Housing SEPP requirements.

11.2.3 Traffic Impacts

JMT Consulting have reviewed the traffic implications associated with the proposal. The assessment has employed trip generation rates prescribed by the RMS Guide to Traffic Generating Development for seniors housing. The rates are as follows:

- 0.1 – 0.2 vehicle trips / dwelling during PM peak hour; and
- 1 – 2 vehicle trips / dwelling per day.

The assessment has adopted a conservative approach by relying on the higher thresholds associated with the above rates.

The assessment accounts for the provision of 110 beds, which represents an increase of 14 from the existing development. The assessment projects that the proposal will generate a total of 220 daily vehicle trips. This represents an increase of 28 trips from the existing scenario. During peak hour, the proposal will increase the existing trips from 19 to 22. The additional traffic generation is considered to be negligible in the context of the surrounding road network and will have no adverse impact on the functioning of the surrounding street network. Accordingly, localised road upgrades are not considered necessary.

11.3 Voluntary Planning Agreement

A voluntary planning agreement (VPA) is a voluntary agreement between a planning authority and a developer, who has sought a change to an environmental planning instrument; or made or proposes to make a development application or application for a complying development certificate, under which the developer is required to:

- dedicate land free of cost;
- pay a monetary contribution;
- provide any other material benefit; or
- provide any combination of the above,

to be used for or applied towards a public purpose.

Council's Policy on Planning Agreements is a matter for consideration in the assessment of any Planning Proposal.

There is no VPA submitted in conjunction with the Planning Proposal as:

- a. The increase in floor space ratio (FSR) and maximum building height on the subject site is linked to a residential care facility land use only – there is no change to the heights and FSRs included in the GRLEP 2021.
- b. There is no increase proposed in the approved number of beds (which is 110) in a new residential care facility, being bedroom space of 3,850sqm of a total development floorspace of 8,203sqm. Thus, there is no increase in development yield, environmental impacts, demand on infrastructure or associated services.
- c. There are site specific provisions in the accompanying site-specific draft DCP that limit the number of beds and bedroom space.
- d. The residential care facility will provide its own services for the occupants and will provide an increase of on-site support and communal facilities.
- e. The proposal is not for independent living – it is for a residential care facility whose occupants are not actively independent.

f. Residential care facilities do contribute to Council's strategic direction and mandate to deliver adequate social infrastructure for the community with an aging population.

As background, the original Planning Proposal was accompanied by a commitment to enter into a VPA and a draft VPA offer was made by the Proponent.

The draft VPA offer was assessed by Council's staff and economic consultants in accordance with Council's Planning Agreements Policy and the NSW Department of Planning and Environment new Practice Note on Planning Agreements (February 2021). Council's Planning Agreements Policy (2016) provides Council's policy and process for negotiating and preparing VPAs.

The draft VPA offer however was later withdrawn by the Proponent stating that the VPA offer does not satisfy the 'Acceptability Test' established within the Department's Practice Note and requested that the Planning Proposal proceed to the Department for a Gateway Determination.

The report to Council's Environment and Planning Committee on 11 October 2021 (ENV045-21) outlines the VPA process that was undertaken. The report notes that the assessment of this Planning Proposal and the VPA offer is different to normal proposals in that although it seeks to increase the development standards for the site under the LEP, the proposal is to replace the existing residential care facility with a new residential care facility with no proposed increase in the number of approved beds/residents.

The Planning Proposal was endorsed by Council with no VPA on the basis that the Planning Proposal/LEP includes a local provision that limits the intensification of the new residential care facility (i.e., there is no increase in the number of beds from the existing nursing home) and there are site specific provisions in the DCP that address these controls.

12 Conclusion

The Planning Proposal will support a high quality aged care facility at the subject site that will achieve a number of positive outcomes for the site and wider community, including:

- Improved access to high quality residential aged care facilities that meet contemporary standards;
- An aged care facility that better addresses the demand for health and social infrastructure associated with the growing ageing population;
- Negligible environmental impacts as demonstrated by the analysis contained within this report and supporting subconsultant reports;
- Increase to the site's employment generating floorspace;
- Job creation that will assist in meeting strategic jobs targets prescribed for the LGA;
- A range of complementary ancillary uses that will provide needed services to the residents;
- A high quality built form that will improve visual interest;
- A density that better relates to the scale of the development in the surrounds, particularly the adjoining three storey developments; and
- Comprehensive landscaping that will improve the visual amenity of the streetscape.

As demonstrated by the above assessment, the proposal satisfies the Site Specific Merit Test and Strategic Merit Test. It also responds to the rapidly growing ageing population and the associated demand for aged care facilities.



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