



planning consultants

13 February 2014
Our Ref: 8231B.2JM

Sutherland LEP Review
NSW Department of Planning and Infrastructure
PO Box 39
SYDNEY NSW 2001

Attention: Ms Marian Pate

By Email: sutherlandlepreview@planning.nsw.gov.au

Dear Ms Pate,

**Part Lot 22 DP 715660 - 31 Bay Road, Taren Point
Justification for Seniors Housing to be included in Schedule 1 of Draft Sutherland
Shire Local Environmental Plan 2013 as an Additional Permitted Use**

DFP Planning Consultants (DFP) has been engaged by Anglican Retirement Villages (ARV) to prepare a submission to the Planning Assessment Commission (PAC) in response to the Review of Draft Sutherland Shire Local Environmental Plan 2013 (Draft SSLEP 2013).

Please find attached copy of submission lodged with Sutherland Shire Council (Council) dated 22 October 2013.

This submission supports the inclusion of seniors housing at Part Lot 22 DP 715660, No. 31 Bay Road, Taren Point within Draft SSLEP 2013 as an additional permitted use within Schedule 1.

Please contact the writer on 9980 6933 should you wish to discuss.

Yours faithfully,
DFP PLANNING CONSULTANTS

**JOHN MCFADDEN
PARTNER**

jmcfadden@dfpplanning.com.au

enc.

Attachment 1: Submission prepared by DFP dated 22 October 2013



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ATTACHMENT I



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22 October 2013
Our Ref: 8231B.1JM
Your Ref: LP/03/79340

General Manager
Sutherland Shire Council
Environmental Planning Unit
Locked Bag 17
SUTHERLAND NSW 1499

Attention: Mr Mark Carlon

By Email: ssc@ssc.nsw.gov.au

Dear Sir,

Part Lot 22 DP 715660 - 31 Bay Road, Taren Point - Justification for Seniors Housing to be included in Schedule 1 as an Additional Permitted Use Pursuant to Clause 2.5 of Amended Draft Sutherland Shire Local Environmental Plan 2013

DFP has been engaged by Anglican Retirement Villages (ARV) to prepare a submission to Sutherland Shire Council (Council) in response to the exhibition of Amended Draft Sutherland Shire Local Environmental Plan 2013 (Draft SSLEP 2013) in support of the inclusion of seniors housing at Part Lot 22 DP 715660, No. 31 Bay Road, Taren Point within Draft SSLEP 2013 as an additional permitted use within Schedule 1.

Background

The Department of Planning and Infrastructure (DoPI) considered Draft SSLEP 2013 during a Gateway Determination and requested that justification be provided for adding seniors housing as a Schedule 1 – Additional Permitted Use at Part Lot 22 DP 715660, No. 31 Bay Road, Taren Point pursuant to Clause 2.5 of Draft SSLEP 2013.

The purpose of this submission is to respond to the request by DoPI by supporting the inclusion of Part Lot 22 DP 715660 as an additional permitted use pursuant to Clause 2.5 and Schedule 1 of Draft SSLEP 2013.

Subject Site

The site is an irregular shaped 3.03 hectare (ha) allotment within Lot 22 DP 715660 known as Part Lot 22 (Proposed Lot 5), No. 31 Bay Road, Taren Point (**Figures 1 and 2**).

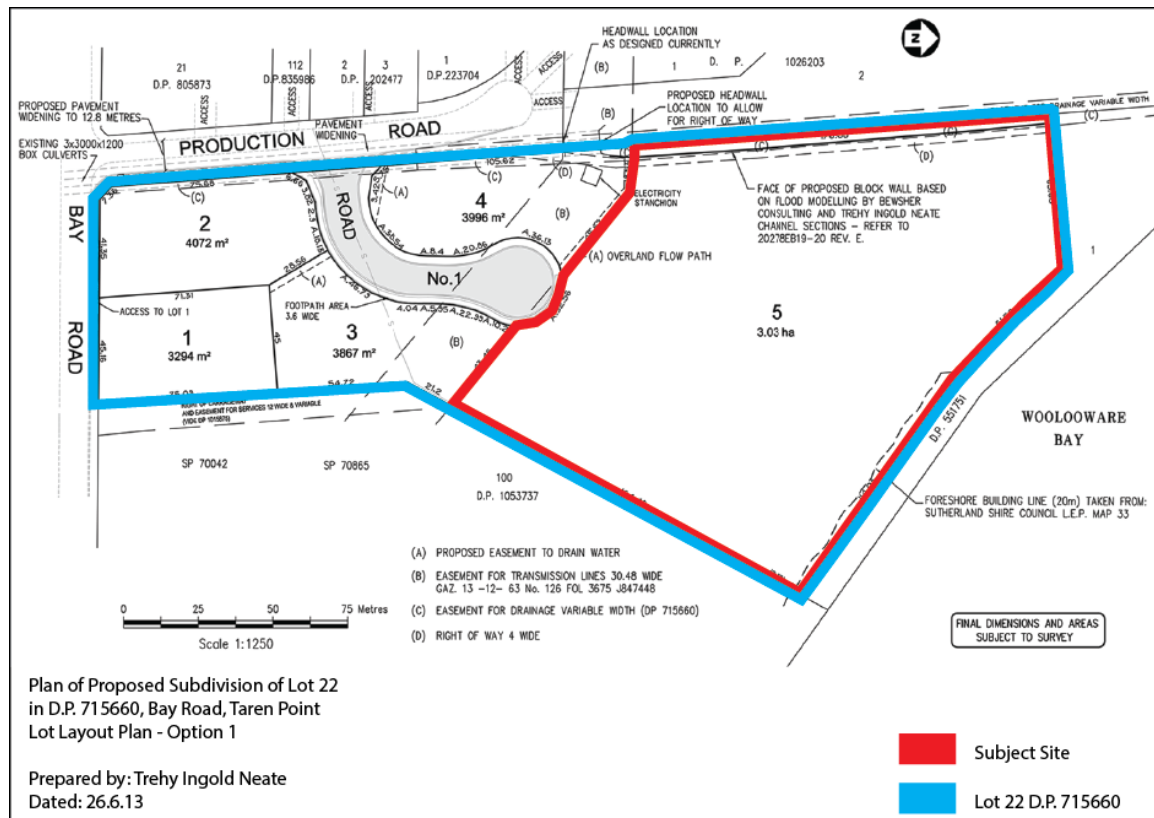


Figure 1: Subject Site - Part Lot 22 DP 715660 No. 31 Bay Road, Taren Point



Figure 2: Subject site as viewed from adjoining foreshore land towards the west (adjoining ARV seniors housing in background)

The site is predominantly surrounded by industrial development with the exception of public open space/foreshore land and Woollooware Bay to the north and ARV's Woollooware Shores seniors housing development located to the north-west at Lot 2 DP 1026203 Alexander Avenue, Taren Point (**Figures 3 and 4**).



Figure 3: Adjoining Foreshore Land and Woollooware Bay to the North



Figure 4: Adjoining ARV seniors housing development to the north-west of the site as viewed from the Woollooware Bay foreshore

Clause 4(11) of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 recognises the Woollooware Shores site at Lot 2 DP 1026203 Alexander Avenue, Taren Point.

Proposed Use of Part Lot 22 DP 715660, No. 31 Bay Road, Taren Point for Seniors Housing

The proposed use of Part Lot 22 DP715660 for seniors housing will generate significant employment opportunities when compared with the site's long term status as vacant industrial land. ARV envisages that approximately 150 direct full-time jobs will be created and a further 100 positions would also be created for contractors, carers, and other health care workers in the locality (similar to the adjacent Woollooware Shores seniors housing development).

Demand

1. Census data estimates that by 2031, 20% of the population in the Sutherland Local Government Area (LGA) will be over 65 years of age. Based on the current population being approximately 220,000, a further 44,000 people are likely to require seniors housing accommodation.
2. Council's Housing Strategy 2012 identified housing for the aged as being in high demand with a clear desire for aging residents to relocate to, or down size within, the Sutherland LGA.



3. Using ARV's Woollooware Shores seniors housing development as an example, currently the village is 100% occupied and the waiting list has at least 500 applicants waiting for an independent living unit (ILU). The proposed sale of Apartment No. 3B recently attracted over 100 people and 16 prospective purchasers priced at \$830,000.00. ARV's Donald Robinson Village (DRV) is similar, with at least 300 applicants on the waiting list and the proposed sale of Unit No. 2B recently attracted 88 people with 9 prospective purchasers priced at \$450,000.
4. The high demand associated with this site for the purposes of seniors housing is buoyed by its location within Sutherland LGA east of Taren Point Road, adjoining waterways, parks, and being proximate to infrastructure such as shops, buses and roads whilst also offering the opportunity for residents to enjoy quiet surroundings with a high level of amenity.

Supply

1. In the Sutherland LGA, Woollooware Shores is the newest combined care retirement village featuring a modern design and a range of apartment sizes that are not readily found elsewhere as other stock is much older and often in need of renovation. There is an estimated 1,200 self-care units in seniors housing developments in the Sutherland LGA with only another 120 self-care units planned for the foreseeable future.
2. New Residential Aged Care Facilities (RACFs) have been built at Miranda, Jannali and Kirrawee and another is currently under construction at Engadine, yet more seniors housing is still required in order to satisfy the demand extrapolated from the above Census data for the Sutherland LGA.

Proposed Design

1. An opportunity exists to include a RACF in the future design of a seniors housing development on the site with a minimum of 28 dementia bed placements and 90 ILU's.
2. An opportunity also exists to face the ILU's away from employment generating activities and it is noted that no land use conflicts burden the existing Woollooware Shores seniors housing development which is located to the north-west, adjacent to the subject site.
3. There are opportunities to explore access to the site *via* Production Road with a link over the canal and provide enhancement of the adjoining foreshore land without interfering with the access to the Anglers Club facilities and access.
4. Site constraints such as flooding, contamination and heritage are able to be addressed in detail with the submission of a DA to Council.

Draft Sutherland Shire Local Environmental Plan 2013

The site will remain zoned B7 Business Park under Draft SSLEP 2013 (**Figure 5**).

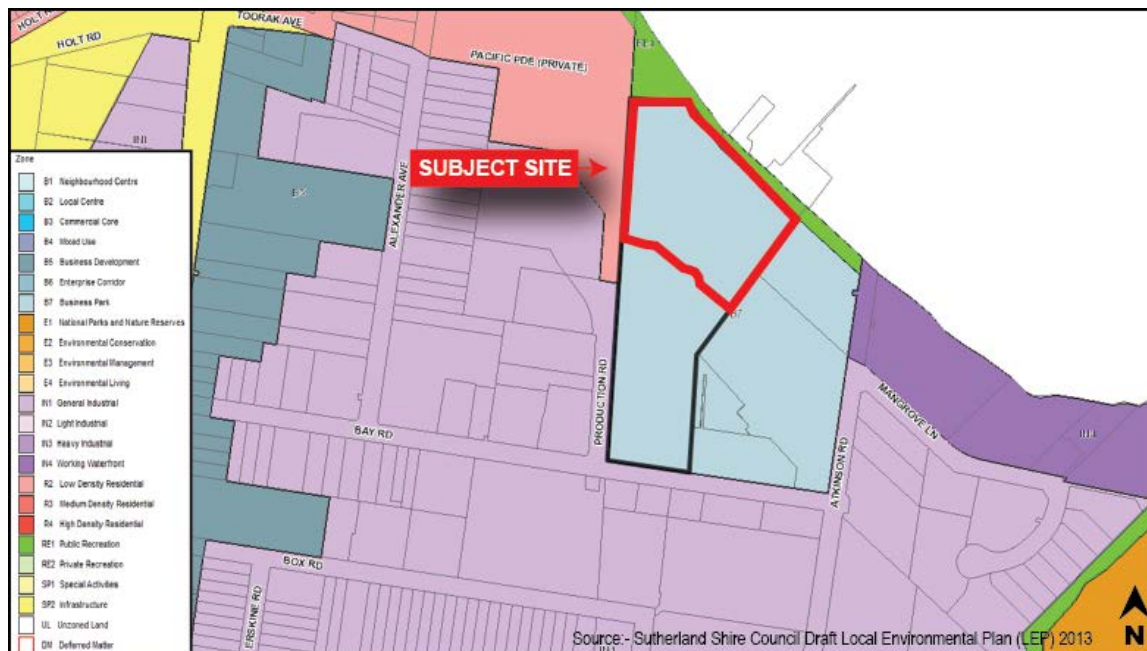


Figure 5: Draft SSLEP 2013 Zoning Map Extract

The objectives of the B7 Business Park zone are:

- To provide a range of office and light industrial uses.
- To encourage employment opportunities.
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.
- To prevent the fragmentation of large sites and to realise their economic strategic advantage.
- To provide opportunities for the erection of buildings requiring large floor areas and to discourage small scale uses unless they are of an ancillary or service nature.
- To enhance the visual appearance of the employment area by ensuring new development achieves a high architectural and landscape standard.
- To minimise the impact of development within the zone on areas of environmental or heritage significance.

'Residential accommodation' includes 'seniors housing' which is defined under Draft SSLEP 2013 as:

- "a building or place that is:*
- (a) a residential care facility, or*
 - (b) a hostel within the meaning of clause 12 of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004,*
 - or*
 - (c) a group of self-contained dwellings, or*
 - (d) a combination of any of the buildings or places referred to in paragraphs (a)–(c),*
- and that is, or is intended to be, used permanently for:*

- (e) seniors or people who have a disability, or*
- (f) people who live in the same household with seniors or people who have a disability, or*
- (g) staff employed to assist in the administration of the building or place or in the provision of services to persons living in the building or place, but does not include a hospital."*

Seniors housing is prohibited in the B7 Business Park zone under Draft SSLEP 2013. Notwithstanding, Clause 2.5 of Draft SSLEP 2013 pertains to additional permitted uses for particular land as follows:

- (1) Development on particular land that is described or referred to in Schedule 1 may be carried out:*
 - (a) with development consent, or*
 - (b) if the Schedule so provides—without development consent, in accordance with the conditions (if any) specified in that Schedule in relation to that development.*
- (2) This clause has effect despite anything to the contrary in the Land Use Table or other provision of this Plan.*

Clause 41 of Schedule 1 pertains to the use of certain land at 31 Bay Road, Taren Point as follows:

- (1) This clause applies to 31 Bay Rd, Taren Point being part lot 22, DP715660.*
- (2) Development for the purpose of seniors housing is permitted with consent.*

Seniors housing is able to be appropriately designed to avoid being affected by (or creating) land use conflicts such as noise, odour and visual blight. Design options including building setbacks with landscape screening and the efficient location of infrastructure, roads and services will also assist with reducing the potential for land use conflicts. There is also scope for access to be gained from/through ARV's Woollooware Shores seniors living housing development, or from Production Road.

Draft SSLEP 2013 contains various clauses pertaining to height, floor space ratio (FSR) foreshore building line, flood prone land, acid sulphate soils, contaminated land management and heritage items which are all able to be addressed as part of a DA submission to Council. Likewise, impacts on the built environment such as allotment layout, overshadowing, height, bulk and scale and streetscape presentation are also able to be addressed when a DA for a proposed seniors housing development is assessed by Council under Section 79C of the Environmental Planning and Assessment Act 1979 (EP&A Act 1979).

Seniors Housing as an Additional Permitted Use in Schedule 1 of Draft SSLEP 2013.

The inclusion of a seniors housing development on the site as a Schedule 1 Additional Permitted Use is generally consistent with the broader objectives of the Draft Metropolitan Strategy for Sydney and will indirectly assist with its implementation whilst also providing an opportunity for ARV to take advantage of a more efficient use of a site that offers good amenity for future residents adjacent to existing public open space and the foreshore of Woollooware Bay.

Relevant State Environmental Planning Policies and their relationship with the proposed seniors housing development on the site are outlined in the table below:

SEPP	Requirement	Seniors Housing (Schedule 1 – Additional Permitted Use)	Comply
SEPP(Kurnell Peninsula) 1989	<p>Schedule 3 of State Environmental Planning Policy (Kurnell Peninsula) 1989 (SEPP Kurnell) identifies an oyster jetty at the end of Atkinson Road, Shell Point as an item of heritage significance.</p> <p>The nearby heritage item is recognised in Draft SSLEP 2013 as an oyster jetty known as Item No. 2508 at Lot 2 DP 879760, end of Atkinson Road, Shell Point, Kurnell.</p>	Future development of the site for seniors housing purposes is unlikely to create an adverse impact on the nearby item of heritage significance.	Yes
SEPP 32 – Urban Consolidation	The Minister must, when considering the making of environmental planning instruments relating to urban land, implement the aims and objectives of this Policy to the fullest extent practicable.	Able to be consistent with SEPP 32 in providing the opportunity for urban development in areas where there is existing public infrastructure, transport and community facilities, close to employment, transport, retail, services, leisure and other opportunities.	Yes
SEPP 55 – Remediation of Land	When carrying out planning functions under the Act (including undertaking LEP amendments), SEPP 55 requires that a planning authority must consider the possibility that a previous land use has caused contamination of the site as well as the potential risk to health or the environment from that contamination.	Contamination can be addressed and any remediation measures as part of a DA.	Yes
SEPP (Infrastructure) 2007	The relevant matters for consideration include the requirement to refer a development application to the RTA on the basis that the proposal will contain more than 300 dwellings (Schedule 3).	Where relevant, detailed compliance with SEPP is able to be demonstrated at the time of making a DA.	Yes
SEPP 65 – Design Quality of Residential Flat	This Policy aims to improve the design quality of residential flat	Where relevant, detailed compliance with SEPP 65 is able to be demonstrated at	Yes

SEPP	Requirement	Seniors Housing (Schedule 1 – Additional Permitted Use)	Comply
Development	development in New South Wales.	the time of making a DA.	
SEPP (BASIX) 2004	The aim of this Policy is to ensure consistency in the implementation of the BASIX scheme throughout the State.	Where relevant, detailed compliance with SEPP (BASIX) is able to be demonstrated at the time of making a DA.	Yes
SEPP (Major Development 2005)	Specifies that residential, commercial or retail projects with a capital investment of more than \$100 million are State Significant Development.	Where future development of a site exceeds a capital investment value of \$100 million, the proposal will be State Significant Development.	Yes

Consideration of seniors housing as a Schedule 1 additional permitted use on the site is unlikely to create any inconsistency with any relevant State Environmental Planning Instrument. The relevant Section 117 Directions contained within the EP&A Act 1979 are outlined in the table below:

S.117 Direction No. and Title	Contents of S.117 Direction	Seniors Housing (Schedule 1 – Additional Permitted Use)	Comply
1.1 Business and Industrial Zones	A draft LEP shall retain the areas and locations of existing business and industrial zones.	B7 Business Park Zone to be retained with 'Seniors Housing' as an additional permitted use pursuant to Clause 2.5 and Schedule 1 of Draft SSLEP 2013. Therefore, as noted in the Economic Assessment prepared by DFP provided at Attachment 1 , opportunities to develop the site for business purposes will not be lost as the range of permissible uses will not be reduced by the proposal to include seniors housing as a permissible use.	Yes
2.1 Environment Protection Zones	A draft LEP must facilitate the protection and conservation of environmentally sensitive areas and must not reduce the environmental protection standards that would otherwise apply. A draft LEP may be inconsistent with the terms	N/A	N/A

S.117 Direction No. and Title	Contents of S.117 Direction	Seniors Housing (Schedule 1 – Additional Permitted Use)	Comply
	of this direction only if council can satisfy the Director-General of the Department of Planning based on one or more grounds contained within the Circular.		
2.3 Heritage Conservation	Planning proposal must facilitate conservation of places of heritage significance. A draft LEP may be inconsistent with the terms of this direction only if council can satisfy the Director-General of the Department of Planning based on one or more grounds contained within the Circular.	Oyster jetty at Lot 2 DP 879760 is identified as an item of heritage significance within Schedule 3 of SEPP (Kurnell Peninsula) 1989 (Ref: B312). Council has subsequently recognised this heritage item within Draft SSLEP 2013 (Ref: 2508). The impact on the heritage item adjacent to foreshore of Woollooware Bay is likely to be minimal.	Yes.
3.1 Residential Zones	Planning proposal must broaden the choice of building types in the housing market, make more efficient use of infrastructure and services, reduce consumption of land on the fringe, and be of good design.	Opportunity for development to provide more seniors housing choices, efficient use of infrastructure and services, and to direct some demand for housing away from the fringe, and provide good urban design to improve the locality.	Yes
3.3 Home Occupations	Planning proposal must permit home occupations to be carried out in dwelling houses without consent.	Nil impact.	Yes
3.4 Integrating land use and transport	Planning proposal must be consistent with DUAP publications "Improving Transport Choice" and "The Right Place for Business and Services".	Generally consistent.	Yes
4.1 Acid Sulphate Soils	The relevant planning authority must consider the Acid Sulphate Soils Planning Guidelines adopted by the Director-General of the Department of Planning when preparing a planning proposal that applies to any land identified on the	Acid sulphate soils analysis is able to be provided as part of any future DA submission.	Yes

S.117 Direction No. and Title	Contents of S.117 Direction	Seniors Housing (Schedule 1 – Additional Permitted Use)	Comply
	Acid Sulphate Soils Planning Maps as having a probability of acid Sulphate soils being present.		
4.3 Flood Prone Land	Planning proposal must be consistent with the NSW Government's Flood Prone Policy and the principles of the Floodplain Development Manual 2005, and the provisions of an LEP on flood land is to be commensurate with flood hazard and include consideration of the potential flood impacts both on and off the subject land.	The site is identified as being flood prone in Council's Gwawley Bay Catchment Flood Study and Plan, as well as on Council's Flood Prone Land Map. Investigation by a specialist hydraulic engineering consultant is able to be undertaken as part of any future DA.	Yes
6.2 Reserving Land for Public Purposes	Planning proposal to facilitate the provision of public services and facilities by reserving land for public purposes and to facilitate the removal of reservations of land for public purposes where the land is no longer required for acquisition.	Seniors housing will not alter the existing zonings and reservations of land for public purposes.	Yes
6.3 Site Specific Provisions	The objective of this direction is to discourage unnecessarily restrictive site specific planning controls.	No restrictive site specific provisions are to be proposed in Draft SSLEP 2013 that are associated with the site.	Yes

Further to Direction No. 1.1 above, the Economic Assessment prepared by DFP at **Attachment 1** concludes the following:

“The above discussion demonstrates that the development of this land in accordance with the proposed B7 zoning, whilst likely to generate employment opportunities in the Sutherland LGA, might not necessarily result in the land being developed due to circumstances beyond the control of Council. This risk is also acknowledged in the Employment Strategy.

There is an element of uncertainty associated with the type of development envisaged for this land, as to whether developers will take the opportunity to develop the subject site for the purposes of a commercial office development due to the potential risks associated with a speculative development of this nature in terms of initial investment costs, difficulty in sourcing finance and the possibility of the building



remaining vacant due to its out of the centre, metropolitan location being unattractive to the types of firms and companies that require large floorspace areas.

A seniors housing development could provide in excess of 250 jobs as part of the ongoing operation of the development. In addition, direct and indirect jobs would be created during the construction phase of the project.

By including the proposed development of the site for the purposes of seniors housing as a permitted additional use, the potential development of the site for B7 type uses is not negated. It may be appropriate for at least part of the development to include uses which are permissible in the B7 zone particularly where these are appropriate and provide support services to the seniors housing development.

The use of the site for the purposes of a seniors housing development does provide some certainty with respect to the land being used for a viable economic activity which may also provide the catalyst to other associated activities being developed on vacant adjoining lands.

Therefore, the inclusion of seniors housing as an additional permitted use on this land is supported and will produce results in the form of a viable economic use of the land, which cannot be guaranteed even with a proposed B7 zoning of the land."

The inclusion of 'seniors housing' as a Schedule 1 additional permitted use pursuant to Clause 2.5 of Draft SSLEP 2013 is generally consistent with the Section 117 Directions prescribed by the Minister contained within the EP&A Act 1979 and an Economic Assessment of the proposal prepared by DFP at **Attachment 1** indicates that it is satisfactory having regard to the benefits that are likely to create a positive impact in the Sutherland LGA.

Objects of the EP&A Act 1979

A seniors housing proposal on the site is able to uphold the Objects of Section 5(a)(i) and (ii) of the EP&A Act 1979 which are:

"(a) to encourage:

- (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
- (ii) the promotion and co-ordination of the orderly and economic use and development of land".*

Sutherland Shire Development Control Plan (SSDCP) 2006

Sutherland Shire Development Control Plan (SSDCP) 2006 includes some controls which apply to the Taren Point employment area that are relevant to this site and a proposed seniors housing development as follows:



The economic development strategy for Taren Point requires the evolution of the locality from a traditional industrial area into a broad based employment area.

Urban Design

The urban design strategy for Taren Point is to improve the quality of the area so that its environmental amenity is enhanced and more attractive streetscapes evolve.

Key to implementing the urban design strategy for Taren Point will be an emphasis on a well designed built form balanced with the functional needs for on site car parking/manoeuvring and the benefits of well designed landscaping.

The Environment

The Taren Point Employment area is adjacent to the aquatic reserve of Woollooware Bay. Water quality controls are urgently needed to lessen the impact of the activities in the area on the environmentally significant ecological communities in Woollooware Bay, as well as providing an upgrade to the drainage infrastructure in the area to help reduce the impact of flooding.

Where relevant, the proposed use of the site for a seniors housing development is able to address SDCP 2006.

Conclusion

On behalf of ARV, DFP supports the inclusion of seniors housing at Part Lot 22, DP 715660, No. 31 Bay Road, Taren Point as an additional permitted use within Schedule 1 of Draft SSLEP 2013.

The provisions contained within Clause 2.5 and Schedule 1 of Draft SSLEP 2013 enable the site to accommodate a more flexible range of uses (including seniors housing which is consistent with ARV's existing Woollooware Shores seniors housing development to the north-west of the site adjacent to the foreshore) without negating the business uses that would otherwise be permissible within the B7 Business Park zone.

Given that the site has been vacant for many years, the proposed use of the site adjacent to the foreshore of Woollooware Bay for a seniors housing development will generate new employment opportunities and provide a high level of amenity for future residents without creating (or being affected by) any significant adverse land use conflict with surrounding development.

The site offers a high level of amenity for residential development adjacent to Woollooware Bay and the public open space land that currently separates the site from the foreshore. Based on the town planning and economic assessment contained herein, the inclusion of seniors housing as a Schedule 1 additional permitted use within the B7 Business Park zone of Draft SSLEP 2013 is satisfactory having regard to the Section 117 Directions under the EP&A Act 1979.



Please contact the writer on 9980 6933 should you wish to discuss.

Yours faithfully,

DFP PLANNING CONSULTANTS

A handwritten signature in black ink, appearing to read 'John McFadden', written in a cursive style.

**JOHN MCFADDEN
PARTNER**

jmcfadden@dfpplanning.com.au

enc.

Attachment 1: Economic Assessment prepared by DFP

Reviewed: _____

A handwritten signature in black ink, appearing to read 'R. Hanger', written in a cursive style.

23 September 2013
Our Ref: 8231B.1ER

The General Manager
Sutherland Shire Council
Locked Bag 17
Sutherland NSW 1499

Attention: Mark Carlon, Environmental Planning Unit
Council's Reference: LP/03/79340

Dear Mark

**Economic Assessment
Re-exhibition of Draft Sutherland Shire Local Environmental Plan 2013
Part Lot 22 DP 715660 - 31 Bay Road, Taren Point**

DFP is assisting Anglican Retirement Villages (ARV) in relation to land at 31 Bay Road, Taren Point and the proposed use of this land for seniors housing.

On 15 August 2013 Sutherland Shire Council (Council) wrote to Mr Peter Paltoo of ARV to indicate that the draft Sutherland Shire Local Environmental Plan 2013 (draft LEP 2013) had been amended to allow Seniors Housing as an additional permitted use on Part Lot 22 DP 715660 (being 31 Bay Road, Taren Point) in Schedule 1 – Additional Permitted Uses.

DFP, on behalf of ARV, supports the proposed amendment to draft LEP 2013.

The Department of Planning and Infrastructure (the Department) as part of the Gateway Determination which allowed for re-exhibition of draft LEP 2013, requested additional justification to support the inclusion of the use of 31 Bay Road, Taren Point for the purposes of seniors housing in Schedule 1 of the draft LEP. The purpose of this letter is to provide that justification.

1.0 Strategic Planning

In order to inform the preparation of draft LEP 2013, Council undertook a number of strategic investigations including:

- A Housing Strategy;
- An Employment Strategy; and
- An Environmental Strategy.

1.1 Housing Strategy

The Housing Strategy is Council's commitment to guide future housing supply in the Sutherland Shire to 2031.

The aims of the Housing Strategy are:

1. *To meet the needs of an ageing population, creating opportunities for people who want to downsize to small dwellings close to shops and services*
2. *To consider environmental constraints when locating additional housing*
3. *To provide suitable dwellings for an increasing number of small households*



4. *To increase housing choice*
5. *To revitalise town centres*
6. *To promote the efficient use of public transport and existing infrastructure*
7. *To retain the established residential character of mostly low density housing in landscaped settings*

The Housing Strategy was developed having regard to the Ageing Strategy which was also prepared by Council. The Ageing Strategy was expressly developed to ensure Council is equipped to meet the needs of the ageing population.

The Ageing Strategy was developed with input from key stakeholders from a wide range of services associated with older people. Local residents also played a role in its development. That consultation found provision of appropriate housing to be a crucial need of the ageing population.

The Housing Strategy recognises the challenges facing Council and the community with respect to providing sufficient, appropriate housing for the ageing population. According to the Strategy:

The proportion of residents aged over 65 years was 14.9% of the population in 2011, up from 13% in 2006. Population estimates for 2031 suggest that this proportion will increase to 20% of the population. Older people tend to live alone or in two person households. As older person households become the dominant household type, the Shire's population will fall unless housing supply increases.

Council's Ageing Strategy highlighted the housing needs of the ageing community and demonstrated that the majority of older residents want opportunities to downsize to quality dwellings within their communities.

By allowing seniors housing to be developed on the land at 31 Bay Road, Taren Point many of the objectives of the Housing Strategy and Ageing Strategy will be met.

The site is of sufficient area to accommodate a range of housing types and associated support services. It is anticipated that a residential aged care facility (RACF) together with at least 90 self contained dwellings will be developed should the draft LEP be varied as proposed.

The site is located immediately adjacent to the Woollooware Shores Village which comprises 228 ILUs and a 119 bed RACF. Services provided as part of the Woollooware Shores development include:

- Health services including physiotherapy and medical clinic,
- Café and chaplaincy services
- Mini bus service to Westfield Miranda, Southgate Sylvania, Menai Market Place,
- Maintenance assistance and volunteering opportunities.

The site also benefits from being immediately adjacent to the foreshore reserve of Woollooware Bay which provides a pleasant interface for the site.

Therefore, although the subject site is not located within or adjacent to a centre, there are essential services available providing for the needs of future residents. Therefore, it is considered to be an appropriate location for a seniors housing development.

1.2 Employment Strategy

In January 2013, Council published an Employment Strategy for the purposes of informing the development of the draft LEP 2013. The Employment Strategy notes that:

A core element of Council's planning responsibility is the promotion and co-ordination of the orderly and economic use and development of land. Council needs to ensure that its application of zones and development standards protects the existing employment base while ensuring opportunities for appropriate future expansion. The Employment Strategy



2031 guides the content of the DSSLEP2013 to make sure the planning framework supports good economic, employment and social outcomes.

Therefore, the rationale behind the zonings applied to sites identified as having employment potential was to ensure that there was sufficient land available to increase employment opportunities in Sutherland Shire.

These opportunities will continue to exist even if draft LEP 2013 is amended as proposed as the land will still be zoned B7 Business Park. And as demonstrated in the discussion in Section 2 below, the employment capacity of a seniors housing development on this land will be approximately 150 direct full time jobs with a further 100+ jobs created within associated industries.

2.0 Economic Capability Assessment

The Employment Strategy identified land at Taren Point/Caringbah and the Kurnell Peninsula as having the best employment growth potential.

The Employment Strategy recognises that there has been a shift in focus from traditional manufacturing and industrial activities to more business and knowledge-based industries which have very different needs in terms of building design and services. The trend of 'deindustrialisation' is continuing to result in the net decline of traditional industrial jobs. This is a global trend owing to the greater efficiencies achieved through technology and mechanisation. Following from this trend, as industrial development relocates to areas with better access to motorways, railways and airports, the redundant waterfront land previously occupied by those industries becomes available for redevelopment.

Council has recognised that there are large tracts of vacant employment land in Taren Point (including the subject site) and has sought to encourage the development of these lands for employment-generating activities by applying a B7 Business Park zoning.

Although it is the aim of the Employment Strategy to encourage employment generating uses that will improve employment self containment, the Strategy also recognises that *regardless of the zoning decisions and other strategies council may propose or implement through its DSILEP to attract key employers to the area, many factors influence employers' decisions to relocate, most of which are outside the control of council. Consequently, there is no guarantee that Sutherland Shire's employment future will resemble the forecasts or the Employment Strategy's aspirations.*

Although there have been encouraging signs with respect to economic recovery and investment resulting in new construction work, the development of the subject site for offices (as part of a business park development) is questionable due to its somewhat isolated location in terms of proximity to transport and centres of activity.

If the site was developed as offices as part of a business park development, it could theoretically provide employment for over 3,000 persons (based on one employee per 15m² of gross floor area). This scenario is based on a floorspace ratio of 1.5:1 (as proposed under the draft LEP) and the site's potential to support a commercial development with a gross floor area of around 45,000m².

A more realistic development scenario might be one which involved a development comprising warehousing/logistics with associated office functions. A development of this nature would be unlikely to be able to realise a floor space ratio of 1.5:1 given the large areas required for vehicle manoeuvring and parking.

The employment potential of such a development would be approximately 480 employees. This estimate has been based on a development comprising around 13,500m² of warehouse space (and an employment ratio of 1 employee for every 75m² of warehouse space) and 4,500m² of associated office space (with 1 employee/15m² of associated office space).



Although such a development has a theoretically higher direct employment capacity compared to the proposed seniors housing development (which has an estimated direct employment capability of around 150 persons with a further 100+ jobs created within associated industries), there is certainty associated with the seniors housing development, whereas the development of the site for other uses (including office park) is speculative and dependant on more positive economic circumstances.

We have undertaken previous research in relation to the opportunities for development proposals featuring large office style floorspaces and found that unless a prospective tenant 'pre commits' to a development of this scale, particularly in a metropolitan location, such developments are unlikely to proceed due to the significant risks attached to their speculative nature. Further, without the necessary pre commitment from a tenant, affordable finance would be virtually impossible to secure.

In our experience, companies with floorspace uses of this scale would generally be multi-national business enterprises or large government department. In either instance, such an organisation would be more likely to seek accommodation within an established centre which is well serviced by public transport. From this perspective the subject site would not be an attractive option.

Should the proposed seniors housing development proceed it could provide approximately 150 direct full time jobs and another 100+ jobs to contractors, carers, and other health care workers in the region. This does not include the jobs that would be created during the construction phase of the project.

In addition to these direct and indirect jobs that will be created as a result of the project, significant economic flow on economic benefits will be realised if this land is developed. This is known as the multiplier effect.

2.1 Multiplier Effects

The multiplier effect is that which occurs when an increase in spending produces an increase in national income and consumption which is greater than the initial amount spent.

For example, in the case of the proposed seniors housing development, it will generate work for workers associated with the health care and aged care service industry and will stimulate employment in a variety of other associated service industries such as food catering, laundry services, product suppliers, building maintenance and landscaping services.

In terms of construction related employment, it is estimated that four full time construction positions¹ over 12 months is created for every one million dollars of construction work undertaken. For example, therefore, based on the estimated construction cost of a development being \$200m, approximately 800 'job years' would be directly generated. One job year is the equivalent of one full-time job for one full year.

Taking into account the other production induced effects and consumption induced effects, a development with a construction cost of \$200m has the potential to generate 3,288 job years² in total over the length of the project.

Although multiplier effects are national and not necessarily local, they are useful in demonstrating that development of this land will have significant additional economic benefits beyond the immediate site and that these benefits will not be realised if the land continues to remain vacant and undeveloped.

3.0 Other Economic Planning Considerations

Successful business park enterprises generally occur in cases where there is a clustering of activities and businesses which are mutually supportive of each other. There is an element of

¹ Source: IBIS World Construction Industry Report 2011

² Based on ABS Australian National Accounts: Input-Output Tables 1996-97 (ABS Cat No. 5209.0)



synergy associated with these developments which includes knowledge sharing and spin off business as a result of the co-location of like businesses and companies. Business parks are also generally designed around a 'campus' style of development with large tracts of landscaped areas and attractive gateway approaches.

In this regard, the B7 zoned land within Taren Point may not be sufficiently large enough to be considered a 'business park'. Notwithstanding, there is the potential for some smaller office buildings to be developed on some of the B7 land in accordance with Council's vision as noted in the Employment Strategy. It is considered unlikely however that a large, speculative commercial office development would be viable given the out of centre location.

The development of the land for the purposes of seniors housing is unlikely to result in the adjoining land being sterilised and unable to be developed in accordance with the B7 zoning as the uses envisaged in the land use table to the B7 zone as noted in the draft LEP are not incompatible with a seniors housing development. There is the opportunity as part of any detailed planning for the site to provide adequate buffer areas to ensure the impacts of any future development on adjoining sites can be mitigated.

4.0 Conclusion

The above discussion demonstrates that the development of this land in accordance with the proposed B7 zoning, whilst likely to generate employment opportunities in the Sutherland LGA, might not necessarily result in the land being developed due to circumstances beyond the control of Council. This risk is also acknowledged in the Employment Strategy.

There is an element of uncertainty associated with the type of development envisaged for this land, as to whether developers will take the opportunity to develop the subject site for the purposes of a commercial office development due to the potential risks associated with a speculative development of this nature in terms of initial investment costs, difficulty in sourcing finance and the possibility of the building remaining vacant due to its out of the centre, metropolitan location being unattractive to the types of firms and companies that require large floorspace areas.

A seniors housing development could provide in excess of 250 jobs as part of the on going operation of the development. In addition, direct and indirect jobs would be created during the construction phase of the project.

By including the proposed development of the site for the purposes of seniors housing as a permitted additional use, the potential development of the site for B7 type uses is not negated. It may be appropriate for at least part of the development to include uses which are permissible in the B7 zone particularly where these are appropriate and provide support services to the seniors housing development.

The use of the site for the purposes of a seniors housing development does provide some certainty with respect to the land being used for a viable economic activity which may also provide the catalyst to other associated activities being developed on vacant adjoining lands.

Therefore, the inclusion of seniors housing as an additional permitted use on this land is supported and will produce results in the form of a viable economic use of the land, which cannot be guaranteed even with a proposed B7 zoning of the land.

Yours faithfully

DFP PLANNING CONSULTANTS

A handwritten signature in black ink, appearing to read 'ER', is written over the printed name and title.

ELLEN ROBERTSHAW
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