

Draft North District Plan

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Organisation name: Little Company of Mary Health Care Ltd

Organisation type: Industry

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Submission content: See attached.

Number of attachments: 1



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Greater Sydney Commission
PO Box 257
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Attention: Deborah Dearing – North District Commissioner

Town Planning Submission in relation to the draft North District Plan

Dear Ms Dearing,

This letter has been prepared on behalf of Little Company of Mary Health Care Ltd (Calvary) and forms a submission to the draft North District Plan. This submission specifically relates to the Calvary Ryde Retirement Community, which is located within the Ryde Local Government Area (LGA) (refer **Figure 1** for site location). Further to the submission made in March of this year to the original draft District Plan, this letter responds to the updated content of the draft District Plan released for public comment in October.

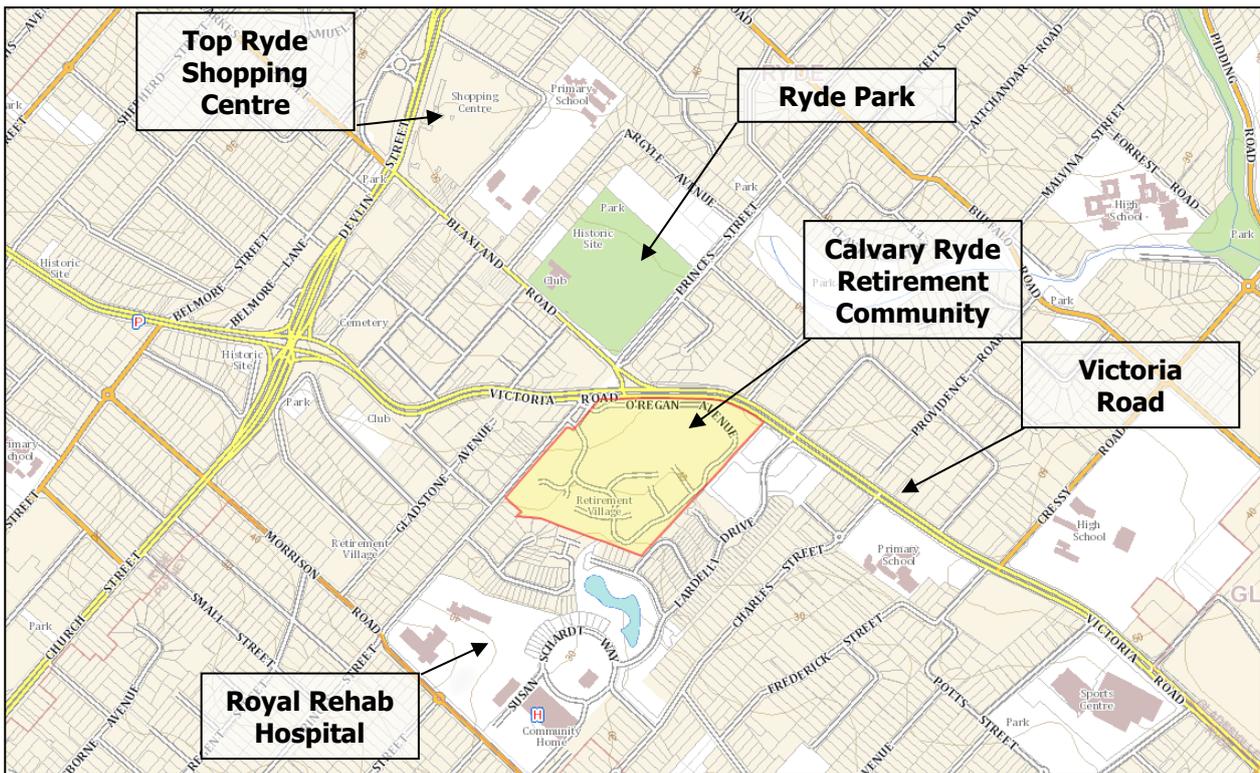


Figure 1. Site Context Map (SIX Maps 2017)

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Calvary Ryde Retirement Community

Seniors Housing is recognized as forming a component of the dwelling targets for the North District. In light of the ageing population, 54% increase in the number of people aged 65+ years in the next twenty (20) years, and growing proportion of couple-only and single-person households, the need for additional smaller homes, group homes, adaptable homes of universal design and aged care facilities, is also acknowledged.

To support the growth of the ageing demographic, the District Plan particularly emphasizes the role of compact housing types, medium density housing, walkable neighbourhoods and universal design. Whilst it is acknowledged that the provision of smaller and accessible housing typologies will suit some older persons, completely independent living will not be conducive to the needs of a large number of ageing Australians. For many older persons, additional facilities that are particularly tailored to the needs of ageing populations, the availability of on-site support and assistance, the presence of like-community, and options for individuals and couples experiencing different stages of ageing and health, will all be required.

Further to the above, Seniors Housing may reduce pressure on hospitals with positive implications for the functionality of health networks within NSW. The provision of independent seniors living and residential aged care also reduces the cost to the state that would otherwise arise from the provision of public hospital beds. By promoting greater independence and a better state of wellbeing, Calvary's model of Seniors Living may also reduce government expenditure on health. Therefore, greater recognition of the importance of designated seniors housing and aged care facilities is required.

Within the District Plan, the importance of providing housing typologies suited to the needs of older persons within their communities, in proximity to family, friends, and established health and support networks, is recognized. Seniors housing and aged care similarly need to be integrated within established communities such that older persons may retain their networks and continue to readily access the places that contribute to socially-connected, active and healthy lives. As well as promoting the co-location of aged care facilities with other infrastructure and services, the District Plan should expressly reference the need for Seniors Housing to be developed in established communities as a form of urban infill development.

To facilitate the delivery of the required growth in Seniors Housing and aged care development within the urban areas comprising the established communities that are vital for older persons to remain in proximity of, specific planning mechanisms (rather than solely generic directions for general housing supply) are required. The amendment of Environmental Planning Instruments (EPIs) to permit Seniors Housing and increased densities of development in strategic locations should therefore be incorporated as a priority or delivery mechanism in the District Plan.

For *existing* retirement communities within established urban areas, possible mechanisms of supporting the required expansion of aged care facilities include bonus heights and FSRs for Seniors Housing and other examples of adaptable and affordable housing.

Specifically, the site of the Calvary Ryde Retirement Community should be rezoned to permit Seniors Housing as an Additional Permitted Use, potentially complemented by a wider range of other uses that are commensurate with the surrounding context. This would ensure the site is statutorily recognised as a significant provider of seniors housing and also as a coherent component of the Victoria Road corridor.

Greater building heights and densities of development should also be allowed on the site of the Calvary Ryde Retirement Community, consistent with surrounding land. It is recommended that the RLEP2014 height controls are amended to permit a maximum building height of 18.5m-21.5m, reflecting the heights allowed on the adjoining Putney Hill apartment building site.

In particular, it is noted that neither the RLEP2014 or SEPP Seniors lend themselves to the provision of seniors housing on the site given that restrictive height controls undermine the viability of providing built form that is responsive to site constraints whilst simultaneously supporting the evolving model of aged care. This evolution of building typology associated with providing housing for the ageing population responds to the diminishing supply of suitable land within Sydney for the provision of seniors housing, and the need to support aging-in-place. Accordingly traditional, sprawling retirement villages no longer meet the needs of seniors living, and

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instead vertical villages incorporating a variety of facilities and services supportive of various levels of care, are required. Therefore, built form controls for the subject site, as well as other sites on which seniors living is permitted, must be revised to allow higher densities of development and therefore to support the delivery of vertical villages.

These zones and development standards are considered an efficient and viable mechanism of ensuring the strategic intent of the draft District Plan (and other relevant strategic planning documents) is translated into implementation.

SUMMARY AND CONCLUSION

In summary, this submission has provided the following recommendations:

- Whilst the District Plan recognizes the need for additional housing supply that is conducive to the needs of older persons, greater recognition of the importance of designated seniors housing and aged care facilities is required.
- In response to the need for Seniors Housing to be integrated within urban areas amongst established communities, and also to support ageing-in-place, vertical villages (as opposed to traditional, sprawling retirement villages) incorporating a variety of facilities and services supportive of various levels of care, are required.
- To achieve the strategic intent of the District Plan and facilitate the required growth of aged care facilities in appropriate locations and for suitable models of care, the amendment of EPIs to permit Seniors Housing and increased densities of development in strategic locations should be incorporated as a priority or delivery mechanism in the District Plan.
- The site of Calvary Ryde should be rezoned to permit Seniors Housing as an Additional Permitted Use within the R2 zone to ensure the site is statutorily recognised as a significant provider of seniors housing and also as a coherent component of the Victoria Road corridor.
- Greater building heights and densities should be allowed on the site of Calvary Ryde, consistent with surrounding land. Expressly, the RLEP2014 height controls should be amended to permit a maximum building height of 18.5m-21.5m, reflecting the heights allowed on the adjoining Putney Hill apartment building site.

The analysis and review undertaken in support of this submission and here-summarised, demonstrate the strategic significance of Seniors Housing within the North District and Greater Sydney. Therefore it is requested that the Greater Sydney Commission pursues the recommendations advised in this submission in order to facilitate a viable and sustainable future.

Yours faithfully,



Chris Wilson
Director
Willowtree Planning