



Your Ref: Draft Position Statement - Residential Aged Care

Western Australian Planning Commission  
infrastructure@dplh.wa.gov.au

Dear Sir/Madam

### **Draft Position Statement – Residential Aged Care – City of Kalamunda Submission**

Thank you for the opportunity to review and provide comments on the recently released Draft Position Statement for Residential Aged Care.

Aged residential care and accommodation is a key consideration for the City of Kalamunda (City) with around 15.8% of our residents being aged over 85. Between 2011 and 2036, there may be a need for 800 – 900 additional aged care beds in the City, of which less than half are accounted for in current forecasts. The City is supportive of a coordinated State Government approach to delivering aged residential care but found the Position Statement falls short with regard to the statutory role of the document and takes a narrow view of the complex needs of aged care.

In summary the key points for consideration include:

1. Definitions are considered appropriate.
2. The strategic led approach to aged care needs through the local housing and planning strategies is supported.
3. Identifying aged care development as a 'P' (Permitted) use may not result in faster approvals as the works component of developments will often require public advertising.
4. Identifying aged care development as an 'A' (Advertise) or a 'D' (Discretionary) use in rural areas should only be supported subject to the proposal meeting a set of requirements relating to matters such as wastewater, bushfire and other relevant considerations.
5. The recommendation for developments to be supported by a Local Development Plans is supported but it should be acknowledged that there may be instances where one may not necessarily be required.
6. Further exploration of key industry trends in aged care like inter-generational aged care facilities and alternative forms of housing accommodation would help provide innovative options.
7. The document could further assist by acknowledging the inherent constraints of delivering aged care in rural areas by providing specific technical guidance around services such as minimum lot sizes requirements, minimum standards for effluent disposal where not connected to sewer, preferred built form outcomes or specifying ancillary uses.
8. Further guidance around facilitating private-public partnerships is needed.

Due to the experience of the City of Kalamunda with aged care proposals particularly in relation to residential and semi-rural locations, the City kindly requests to be involved in any future iterations of the Draft Position Statement.



Please see the attached comments table, Appendix 1 - Background Summary and Appendix 2 - Case Study Summary submitted for your consideration.

Yours faithfully,

Rhonda Hardy  
**Chief Executive Officer**



City of Kalamunda Table of Comments  
Draft Position Statement - Residential Aged Care

Section	Comment
1. Policy intent	<p>The Policy intent states that the draft Position Statement outlines the WAPC's "interim requirements". This suggests that further requirements are likely to be released by the WAPC in the future. It would be useful at this stage to lay out the ultimate planning policy changes envisaged by the WAPC on this matter.</p> <p>The City requests clarification regarding the statutory role of this document as a draft Position Statement or State Planning Policy. The document consistently refers to policy intent, application of policy and policy measures. Should this be read, and applied, as a State Planning Policy or Position Statement?</p> <p>In which case, if only a position statement, how does this relate to statutory actions by local government and would they be mandatory or voluntary?</p> <p>The document notes it may be integrated into the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> in the future and under '3. Application of this policy' states it would apply to local planning strategies, local planning schemes and local planning policies throughout Western Australia.' How does this document relate to the Local Planning Manual which requires Local Governments to review aged accommodation data and demographic trends as part of the Local Planning Strategy preparation process?</p>
5.2 Statutory Planning Requirements.	<p><b>Land use Definitions</b></p> <p>The City raises no objections to the proposed definitions for 'residential aged care facility' and 'retirement village'. The City of Kalamunda Local Planning Scheme No. 3 (LPS 3) currently includes a use for 'Aged Residential Care', however the definition defers to the <i>Aged Care Act 1997</i>.</p> <p>The LPS 3 does not currently have a definition for retirement village. However, the LPS 3 currently includes a land use for 'Aged Dependent Dwellings', which is not defined. It is requested that further clarification be provided to distinguish the retirement village land use from aged/dependent dwellings.</p> <p><b>Changing land use permissibility of residential aged care facility and retirement village from an 'A' or 'D' use to a 'P' use.</b></p> <p>The City, theoretically, does not object to changing the land use classification from an 'A' or 'D' use to a 'P' use in a Residential zone, however, is of the view that this is unlikely to fundamentally change the process required for planning approval. While, under normal circumstances, the use would be</p>



	<p>permitted as of right, the development is more than likely to require detailed consideration, and possibly the exercise of discretion, in relation to matters such as the parking, building design and bulk, setbacks, landscaping and amenity impacts on neighbours.</p> <p>Under the City of Kalamunda – Local Planning Scheme No. 3, if aged care was changed to a ‘P’ use, it would still require a development application to be considered under the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> (Regulations) as the works component of the development is not exempt from planning approval. Furthermore, it would likely be deemed a ‘Significant Application’ under the City’s Local Planning Policy 11 – Public Notification of Planning Proposals and be required to follow certain advertising procedures, regardless of its identification as a ‘P’ use. It is also worth considering, developments worth over \$2 million can be determined by JDAPs and are required to go through the same ‘Significant Application’ advertising process. These situations are predominant in the City of Kalamunda and would likely be similar in other outer metropolitan local governments if investigated.</p> <p>Currently, an ‘A’ or ‘D’ use does not prohibit aged care, but means it requires a level of discretion to determine if it fits within the character of an area or requires advertising prior to a determination. However, as indicated above, in the City this would also apply to a ‘P’ use because of the likely scale of any aged care proposal, the regard required to be given through the Regulations and its trigger for public advertising under Local Planning Policy No.11.</p> <p>By their very nature, aged care facilities, particularly in rural zoned areas, are often controversial due to size, scale, design, traffic and many other valid planning considerations. Retaining the land use permissibility to an ‘A’ or ‘D’ use in Residential zones provides, through the advertising of the proposal, a more open and transparent planning process where other local government do not have specific local planning policies guiding the requirements for public advertising. This is particularly relevant when considered from a built form/design perspective, where residential aged care in residential and non-residential areas will likely have different outcomes with respect to height, scale and massing compared to surrounding developments.</p> <p>The proposed approach taken in the Position Statement appears to be from a perception that there is resistance from local government to approve aged care, however, in the City’s experience, this is not the case. The City has demonstrated that it is very supportive of residential aged care and has considered it a key priority since 2008 when the first Aged Care Accommodation Strategy was adopted by Council.</p> <p>The City has a number of examples that could provide benefit to the draft Position Statement if analysed. Analysis of the case studies provided would also serve to identify key restraints which could be assessed with a view to</p>
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	<p>finding solutions at this stage in the final drafting of the Position Statement rather than at a later stage when the Position Statement has been finalised.</p> <p>Changing aged care to a 'P' use is unlikely to result in more aged care accommodation, as it is primarily driven by the market and the availability of suitable sites, which is mostly unrelated to land use permissibility.</p> <p><b>Rural Areas</b>                  The proposal to have residential aged care designated an 'A' or 'D' use in Rural zoned areas is a complex scenario. The barriers facing aged care in a Rural zone are very different than what they would be in a Residential zone. Applicants need to consider the provision of wastewater treatment or reticulated sewer, the logistics of evacuating numerous vulnerable residents in a bushfire emergency, traffic impacts; impact on Public Drinking Water Source Areas, proximity to medical support, conflicting land uses such as agricultural production, rural residential holdings and impact on rural landscape amenity and views of significance. Access to medical, social, hospitality, retail and entertainment services for the residents of the aged care site is also a key consideration and in rural environments these services are sparse. Further, evacuation of a vulnerable aged care community from bushfire prone areas is a significant risk. Therefore, rural aged care sites should be carefully considered against the risks of isolation and the lack of service infrastructure. The Policy should acknowledge that isolated rural locations will struggle to meet the normal minimum infrastructure requirements and this needs to be balanced with the need, in some instances, to deliver aged care in such locations. The Policy should therefore provide direction as to an acceptable level of service infrastructure for such areas and provide a set of criteria that should be met in order for aged care facilities to be considered in the Rural zone.</p>
<p>5.2 Development approvals for residential aged care facilities and retirement villages</p>	<p>The City agrees that the provisions of a Local Development Plan (LDP) will give affected residents some comfort that controls over the built form, setbacks and landscaping will be applied through an overarching plan. In some cases where the local government has confidence the provider will deliver a high-quality outcome, a LDP may not be required. For example; Karingal Green in High Wycombe was subject to a Structure Plan but was approved without the need for a LDP after advertising to adjoining residential neighbours and a preliminary assessment by the City's Design Advisory Committee. The LDP process, whilst ensuring greater certainty in the outcome, could also delay approval timeframes. The requirement for an LDP needs to be considered on a case by case basis.</p>
<p>Additional comments</p>	<p><b>Innovative Aged Care Options</b>                  The Position Statement is narrow in relation to considering options for aged care in residential areas. The Position Statement contains no reference to inter-generational aged care where young people and seniors can live together. It also does not reference adapting single dwellings for multi-</p>



	<p>generational families where the elderly can live in the same home with the children or family, or cooperative village type developments for independent living but with shared facilities.</p> <p>The City would like to know the extent of public consultation undertaken to determine the community's preference about what kind of aged care they would prefer, and what the design of that might look like? ie; single story grouped dwellings, multiple dwelling, intensive care unit with lodgings (such as Valencia Nursing Homes in Carmel), mixed-use or inter-generational living, cooperative aged care village, multi-generational at home care, or externally assisted home care?</p> <p>Has there been research into how WA is performing in comparison to other states or global leaders in aged care, and what can be implemented from successful case studies from a strategic and statutory planning perspective?</p> <p>The City of Kalamunda has an Aged Care Advisory Committee made up of community leaders either working in, or with knowledge of, the industry. There are also two aged care advocacy groups formed within the City,</p> <ol style="list-style-type: none"> <li>1. Aged Care Today; (ACT) being managed by Mr Malcolm Roberts (JP)</li> <li>2. Friends of Aged Care (FOAC) being managed by Ms. Iris Jones (freeman)</li> </ol> <p>These two community groups also hold significant knowledge and could provide suitable guidance to the Position Statement if consultation could be extended directly to them.</p>
<p>Additional comments</p>	<p>This document also does not include any specific references about how to incentivise private development or facilitate private-public partnerships with aged care providers through planning mechanisms. Setting the land aside for such purpose is only part of the solution. For example, when the Hales by Satterley development was implemented in Forrestfield, it was agreed there would be a site set aside for aged care purposes. The area was the subject of a local structure plan and a site was set aside, however there were no parties who expressed interest in developing the lot for aged care at a price-point that Satterly was willing to sell the lot at and, after many years, it was subsequently disbanded and identified for standard residential uses. In contrast Karingal Green (refer Appendix 2) was set-aside by the developer and, after a lengthy period of time commenced development when it became viable. The Karingal Green case demonstrates aged care can be successfully delivered with appropriate long term planning and commitment from an aged care provider.</p>
<p>Additional comments</p>	<p>It would be helpful to include guidelines around the typical size required for an aged care site, incentivise high level design, locational criteria, typical ancillary uses, supporting infrastructure or effluent disposal parameters required to guide and strengthen decision making on the provision of aged care and assist local government in identifying appropriate land.</p>



	<p>NDIS describe “thin markets” will exist where there is a gap between the needs of participants and the services available in the market. This description is also suitable for aged care needs. The Perth’s Hills is a very thin market in the provision of aged care beds. The shortage in aged care in the City of Kalamunda is nearing 800 and growing.</p> <p>Another way that would facilitate aged care development in thin markets would be to provide a funding stream that discounts land identified suitable for aged care purposes. This could be achieved through a public private partnership arrangement between the State and Local government and the Developer.</p> <p>Some examples of public private partnerships include:</p> <p><b>Local Government Example – Bethanie at Dalyalup</b>              City of Bunbury (CoB) had a site they wanted to facilitate for aged care. Bethanie - Dalyalup. – Joint Venture with Department of Housing and CoB. Funded through a Federal stimulates package. With a cancer respite centre for chemo therapy with St Johns as a partnership model.</p> <p><b>State Government Example - Claremont on the Park</b>              State allocated a portion of Claremont Oval for aged care rise development. Claremont on the park - State Government land provisioned for aged care - serviced apartment with a weekly service fee. Compulsory. 30-40% can be offset by HACC package</p> <p><b>University Example – ECU University Campus - Joondalup</b>              Site allocated for Aged Care and a Retirement Village to assist with facilitating Student Placements.</p> <p>The City of Kalamunda believes that the emerging aged care accommodation crisis will require a shared responsibility that involves all tiers of government, the Not-For-Profit, and academic sectors and the aged care development industry to work together to identify and overcome constraints through creative solutions.</p> <p>The aged care developers require certainty in the provision of suitable land parcels. For example, Bethanie have advised the City as follows:</p> <p>Bethanie Facts:</p> <ul style="list-style-type: none"> <li>• 63 years old</li> <li>• The most recognised aged care brand in Western Australia</li> <li>• One of the largest aged care and retirement living operators in Western Australia</li> <li>• Design and supervise construction in-house</li> <li>• 24 sites:</li> <li>• 12 Aged Care Facilities</li> </ul>
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	<ul style="list-style-type: none"> <li>• 14 retirement villages</li> <li>• 3500 community care customers,</li> <li>• 9 Social Centres,</li> <li>• Social Housing provider for the Western Australian Government</li> </ul> <p>Site Selection:</p> <ul style="list-style-type: none"> <li>• Brownfields</li> <li>• Maximise your stock</li> <li>• Look for other opportunities in Greenfields</li> <li>• Government</li> <li>• Private</li> <li>• Others</li> <li>• Partnerships</li> </ul> <p>Bethanie only build campus style Retirement Village and Residential Aged Care Together – this provides for a continuum of care.</p> <p>Colliers International advise the following development requirements are common:</p> <ul style="list-style-type: none"> <li>• Land Size: 8,000 –12,000 sqm</li> <li>• Building Height: Max 2 Stories</li> <li>• Number of Beds: 80 –140</li> <li>• Number of Jobs: 70 –110</li> <li>• Cost of Development: \$28m –\$35m</li> </ul> <p>It is important for the State in establishing its position on aged care to have considered the varied requirements of the aged care sector.</p>
	<p>The Position Statement could consider evidence based and innovative examples of where aged care has worked well; i.e. is it better in higher density areas, close to public transport, close to community facilities, mixed use developments or is it best in a more isolated or semi or rural settings? The City is of the view that there needs to provision across all these areas as community needs are diverse and the elderly want to be near their families, and families want to be near their elderly. This is a very significant social issue and if not addressed quickly will create loneliness and suffering for our aging community.</p> <p>In conclusion, the draft Position Statement does not really address the looming problem and should be more innovative and aspirational in solutions other than changes to land use permissibility.</p>





## Appendix 1 - Kalamunda Background Summary

To assist with providing some context the City has prepared a background summary for your consideration. The City of Kalamunda, in recognising the emerging issue of an aging population in 2008, commissioned its first Aged Care Accommodation Strategy to provide strategic direction to Council. The Strategy outlines the following details in regards to aged care accommodation:

### 6.2 Aim

Effectively address the housing and accommodation needs of the Shire of Kalamunda's ageing population over the next twenty years.

### 6.3 Objectives and Strategies

#### Objective 1 – Housing Choice

Improve the choice in housing for older people by increasing the number of smaller homes and unit dwellings, maintaining a balanced supply of housing stock to meet demand over time.

#### Strategies

- Review planning policies and building guidelines to ensure these enable a range of housing options, including smaller dwellings, units within the community and units within designated senior's villages.
- Encourage aged persons housing around the town centres of Kalamunda and Forrestfield and other shopping and commercial hubs.
- Encourage smaller lots sizes and aged persons unit sites in all new subdivisions, which is in close proximity to convenience shops and other services.
- Advocate for increasing seniors public and community housing stock as the population ages and increase affordable housing opportunities through the provision of housing and planning policy.

**In 2016 the City of Kalamunda commissioned MacroPlan Dimasi to undertake a review of the 2008 Aged Accommodation Strategy and the following key recommendations were made which have been adopted by Council.**

MacroPlan Dimasi recommended that the City of Kalamunda:

- should not directly undertake any retirement or aged care developments. The sector has become increasingly demanding in terms of regulation, cost efficiency pressures, operational requirements and market demands that both the retirement living and aged care sectors have become more demanding of their owner/operators;
- encourage providers that will provide a 'hub and spoke' approach to aged care which means they will have one or more home bases within the Shire and be able to use these to provide home (community) care services and therefore encourage ageing in place; and
- use government assets (including State Government land) to encourage retirement living and aged care developments (similar to the Carine Rise and Ridgewood Seniors Affordable Housing development examples); and



- prioritise sites close to existing amenities (shops, public transport) which also helps to address the social isolation that some residents have with retirement villages that are suitable for a ground lease to a retirement/aged care operator.

The number of aged care beds in Kalamunda was estimated in 2017 as shown in Table1 below.

*Table 1: Table showing current aged care sites and corresponding number of beds provided*

Name	Address	Owner	Beds 2017	New ACAR beds allocated	Expected Delivery	Beds Expected
Sunshine Park	Brady Road Lesmurdie	Baptistcare	36			36
Parry House	Warlingham Drive Lesmurdie	Amana living	40	60	2020	90
Villa Maria	Lesmurdie Road Lesmurdie	Mercy health	36	90	2020	122
Valencia Nursing Home	Valencia Road Carmel	Roshana Pty Ltd	66	60	2019	120
Donavan Village	Lewis Road Forrestfield	Southern Cross	65			50
Karingal Green	Calophylla Way High Wycombe	Hall and Prior		160	2020	160
Gavour Road	Gavour Road	Ross Leighton			2020	100
			<b>249</b>	<b>470</b>		<b>678</b>



The following graph shows the number of Aged Care and Retirement accommodation in the City of Kalamunda and the 'gap' or number of beds required to meet future demand.

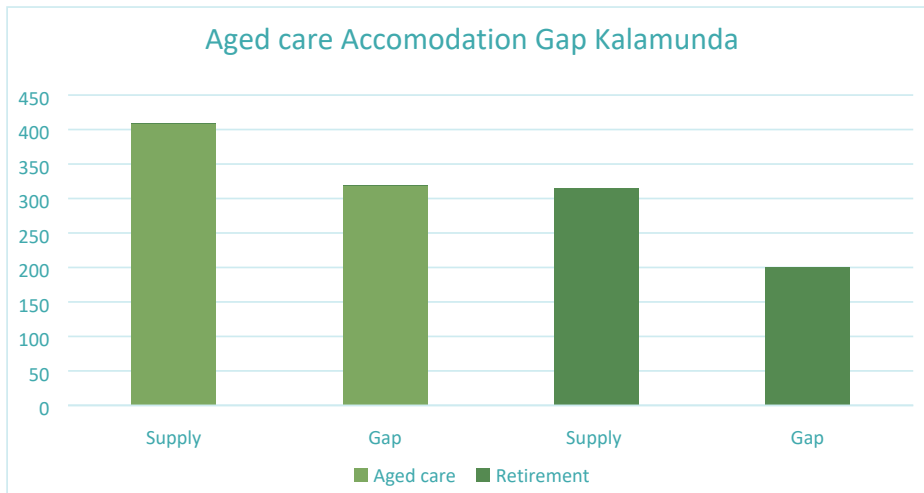
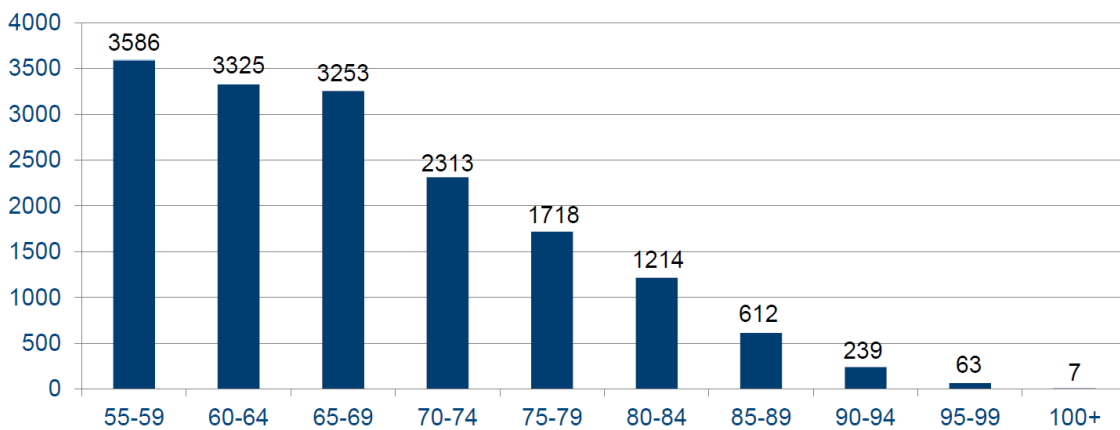


Figure 1. Graph showing the number of beds required (gap) for Aged Care and Retirement accommodation in the City of Kalamunda

The following chart demonstrates the population profile of the aging Kalamunda community. The City can expect a huge demand for aged care within 10 years that will grow exponentially for 2 decades.



Source: ABS 2016 Census

Figure 3. Graph showing number of residents aged over 55 in 2016.

**Current Status**

- The majority of the existing aged care stock may be nearing the end of its economic life.



- Amana Living are planning to redevelop Parry House with the additional 60 beds in ACAR.
- Hall and Prior are commencing a new development in High Wycombe expected to open in 2020.
- Valencia Nursing Home was approved with 120 beds in 2019.
- Karingal Green was approved with 132 beds for 160 residents in 2019.
- Gavour Road rezoning was approved in 2017 but has yet to submit a development application.
- Cambridge reserve is undergoing a Local Planning Scheme Amendment and POS transfer to rezone.
- Heidelberg Park is undergoing an MRS Amendment and POS transfer to rezone.



## Appendix 2 - City of Kalamunda Aged Care Case Study Examples

To assist with providing some context around existing aged care the City has prepared a summary of case studies which may help highlight some of the key challenges.

### Valencia Nursing Home



Valencia Nursing Home is located at Lot 7 (24) Valencia Road, Carmel. The site contained an existing aged care facility and in November 2017 the applicant lodged a development application for expansion to the site. The proposal was considered by the City of Kalamunda Design Advisory Committee (DAC Meeting 1 of 3). In January 2018 the proposal was advertised and received 29 submissions including 24 objections, 4 comments and 1 non-objection.

Key concerns with the design included:

- Proximity to a poultry farm
- Effluent disposal concerns (despite Ministerial exemption)
- Building bulk and height (3-storeys)
- Screening for adjoining neighbours
- Increase to 146 beds which exceeded the maximum number allowed under the approved license.
- Car park design and parking bays

In June 2018, the application was considered by the Metro East JDAP and unanimously refused. Despite Aged Residential Care being a 'P' permitted use in a Private Clubs and Institutions zone the application was still refused based on design flaws and insufficient information. It is also worth noting that this occurred in an area surrounded by Special Rural and Residential Bushland lots so the impact of such a high intensity facility was more apparent than if located in an urban area. An application for review was lodged with SAT in July 2018 and further to mediation, amendments to the design were made and lodged to the City in Feb 2019 for reconsideration. Further to advertising the amendments the City received 13 submissions all of which were objections. In March 2019 the Design Advisory Committee considered the amended design (DAC meeting 2 of 3). In April 2019 the City recommended modifications to the design and the applicant engaged a new architect to undertake a comprehensive re-design of the proposal.

After preliminary review by the Design Advisory Committee in May 2019 (DAC meeting 3 of 3) the amended proposal was lodged with the City of Kalamunda for reconsideration and was approved by Metro East JDAP on 21 June 2019. The amendments included reducing the height to 2-storeys, second level setback a greater distance to reduce bulk, 120 beds in accordance with the license, approval from the Department of Health for the effluent disposal system, additional fencing and vegetative screening and amended car park design.



This shows that while the local government or community may be supportive of increasing aged care facilities it still requires a high level of discretion and it is important to engage with neighboring landowners to understand the impact of these sites. It also highlights that sometimes barriers to aged care relate to design and how it fits with the surrounding character as opposed to planning processes. In this case the applicant was eventually willing to incorporate feedback and address concerns which resulted in a more appropriate design outcome and interface with surrounding properties whilst delivering a much needed increase in beds for residential aged care.

### Karingal Green

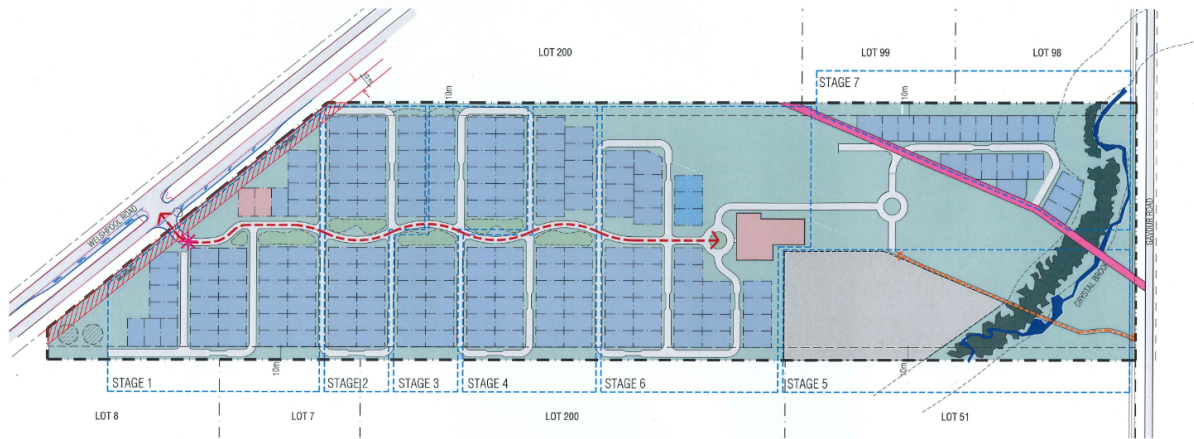


Karingal Green is a precinct within High Wycombe which is subject to an overarching Structure Plan (Karingal Green ODP U2). In this case an Aged Care site was successfully identified through the structure planning process including a nursing home, retirement village, private clubs and institutions zone and Activ housing. In this case the provider, Activ Foundation, owned the land and the site has since been successfully developed for aged care. This shows the critical need to engage with aged care providers early for a coordinated approach to identify land in collaboration with aged care providers and provide a planning framework that supports the land use on specific sites

deemed suitable.



## Gavour Road



The proposal to rezone Lot 500 Gavour Road from Special Rural to Special Use [20] under Scheme Amendment 18, commenced in 2004. The amendment was refused by the Minister for Planning in November 2012, on the grounds the proposal:

- could not connect to sewer;
- was premature given the lack of strategic planning for the area; and
- would constitute an urban land use in a rural zone, which would set an undesirable precedent for development in the locality.

The proposal to rezone the subject site under Scheme amendment 57 commenced in July 2013, specifically addressing the grounds for refusal of Scheme amendment 18. The local community opposition to the proposal and the issues raised remained unchanged to that of Scheme Amendment 18, namely amenity impacts arising from the bulk and scale, traffic and access, loss of native vegetation, bushfire, waste water management.

Amendment 57 was approved by the Minister in July 2017, subject to a number of specific conditions, namely, connection to sewer or an alternative on site wastewater treatment system approved by the Department of Health, a Water Management Plan approved by the Department of Water and Environmental Regulation with connection to sewer required when available, a cap on the number of independent living units to be constructed until such time as the residential aged care component had been constructed, and requirement for an LDP to guide future development on the site particularly in regard to vehicle access, building height limitations, building setbacks and buffer requirements to the creek line.

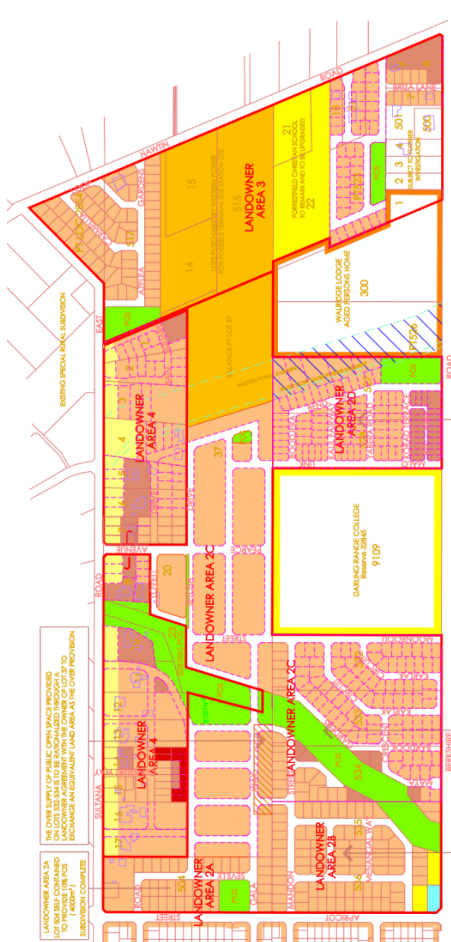
## The Hales

The Hales refers to a residential redevelopment precinct within Forrestfield by Satterley on a site previously owned by Western Power. The Hales is a 28.9ha area of urban land situated approximately 1.5 kilometres north-east of the Forrestfield District Centre. In 2016 Satterley Developments progressed a Local Structure





Plan (LSP) for the site and has since progressed multiple Local Development Plans (LDP's). Council originally approved redevelopment of the area provided some land was set aside for Aged Care purposes.



The City considered the site an opportunity to facilitate aged care in accordance with the initiatives envisaged through the Aged Accommodation Strategy (2008) and the Local Planning Strategy (adopted by the WAPC 2013). The City attempted to achieve an aged care outcome through the LSP process, requesting that the applicant engage with aged care operators to gauge interest in developing a site for aged care, and identify land in the LSP to accommodate a future integrated aged care development. At the time the LSP was progressed, the City understands that the applicant was not in a position to develop the site for aged care, however the City had contacted an aged care provider to determine feasibility for an aged care site in the new development.

Prior to the City finalising its recommendations on the LSP, the applicant advised that an aged care proposal will need to provide an acceptable return for the development in order to be progressed. A 1.8ha parcel of land identified on the LSP map, formerly identified as a potential aged care site, was finalised as a grouped dwelling development.

The City included in recommendations to the WAPC that the LSP be modified to designate the 1.8ha site that was identified as a grouped dwelling lot, as 'Residential Aged Care'. While the City had identified through the Local Planning Strategy and Aged Accommodation Strategy, a need to identify and facilitate appropriate locations for residential aged care, the WAPC was not supportive of the City's recommendation. The LSP was ultimately approved without a Residential Aged Care site.

This case shows indicates that the state planning framework does not appropriately provide for a process to secure and facilitate aged care outcomes.

**Heidelberg Park**

Heidelberg Park is zoned Parks and Recreation under the Metropolitan Region Scheme. The site was previously used for orcharding activity and contained three dwellings, until the late 1990's when the orchards and houses were removed. Heidelberg Park was identified within a report commissioned by the City, prepared by Hester Property Solutions in 2011. The report recommended the site be upgraded as the north-eastern portion of the park is relatively degraded, has low functional or amenity value and is currently used by off-road motorcyclists for recreation. The City undertook community consultation in July 2019 to with a view of understanding the community's vision and values for the site. During this process a number of submissions received indicated support for aged care development on the site.





The City is currently developing a concept plan which includes retention of high quality bushland located adjacent to a National Park Regional Reserve and inclusion of managed parkland areas, residential lots, independent living units for over 55's, and a high care nursing home facility.

The DPLH and the City recently met and agreed, in principle, to support an MRS Amendment request to change the MRS zoning from Parks and Recreation to Urban for a portion of the site. Discussions with DPLH in January 2019 found there was no opposition to developing Heidelberg Park as a mixed residential and aged care site, however the preference was to incorporate it as part of a wider strategic approach to delivering aged care in the hills. In November 2019 Council approved initiation of the MRS Amendment.

This case is an example of the City and the State actively looking to use government assets (including State Government land) to encourage retirement living and aged care developments.



### **Cambridge Reserve**

Cambridge Reserve is zoned Urban under the MRS and Local Open Space under the Local Planning Scheme. The site was identified for a potential aged care site and after extensive community consultation the Cambridge Reserve Concept Plan was adopted by Council on 26 February 2019.

In March the City forwarded the concept plan to the DPLH to initiate the public open space transfer process and received a response with concerns regarding environmental values on the north-eastern portion of the site. The City has since engaged independent consultants to undertake a spring flora survey, hydrology study, bushfire management plan and concept re-design which will likely be referred back to DPLH in mid-2020.

This case is an example of the City actively looking to use government assets (including State Government land) to encourage retirement living and aged care developments.

