![SGS Economics & Planning]

LAKEMBA CARE FACILITY PEER REVIEW, 20-21 BOOREA AVENUE LAKEMBA

FINAL
NOVEMBER 2017

Prepared for
City of Canterbury Bankstown

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2. EXECUTIVE SUMMARY

SGS has undertaken a peer review of two supporting documents for the proposed development of a residential care facility at 20 – 21 Boorea Avenue, Lakemba, prepared by Premier Consulting in April 2015. The first document outlines a "Key Aged Care Demographic Analysis" and the second a "Workforce Supply Analysis" for Western Sydney.

Broadly, given the data focus of these reports, SGS has no major concerns with the data provided as much of it is directly sourced from government data sources such as the 2011 census and aged care service lists. However, some methodological concerns are raised:

- Inconsistency of catchment definitions used in the studies.
- Lack of justification for the very large catchment used for much of the analysis given planning policy goals for aging in place and allowing people to live close to their place of work.
- Lack of clarity around relevance of some report sections and no clear link between reports and the planning application.
- Lack of justification for high growth rates applied to forecasting the Muslim population.

With respect to the bigger issue in question here – whether there is sufficient evidence to justify introducing a non-industrial use into an industrial precinct, SGS has identified gaps in the information provided in relation to the proposed use. Although the reports provide evidence of demand for a Muslim specific residential aged care facility, they do not provide:

- Justification for the proposed use with regards to conflict with strategic policy objectives to protect industrial land.
- An understanding of whether the Canterbury Bankstown LGA has sufficient industrial land supply to meet future demand and so demonstrate that the site under its current use could be surplus to requirements
- Comparison between the wider social benefits of the proposed use over the existing industrial use on site.
- Consideration of alternative sites and why this site is required.

In conclusion SGS recommends that a clearer understanding of the impact that the introduction of a non-industrial use on this site be presented, by comparing the benefits of the proposed use over the current use.

As the two reports by Premier Consulting currently stand, SGS finds that there is insufficient justification to warrant rezoning or change of use on site.

1. INTRODUCTION

SGS Economics and Planning has been commissioned by the City of Canterbury Bankstown to undertake a peer review of two supporting documents for the proposed development of a residential care facility at 20 – 21 Boorea Avenue, Lakemba, prepared by Premier Consulting in April 2015.

The proposed development is for 112 residential care beds, 28 being dementia specific, to provide culturally-appropriate, gender segregated age-care facilities for the Muslim community in Western Sydney[1]. The site is located just inside the southern edge of the Lakemba industrial precinct.

SGS's report structure mirrors that of the two Premier Consulting reports in question:

- Chapter two references the document entitled "Key Aged Care Demographic Analysis, Western Sydney NSW".
- Chapter three of the document "Workforce Supply Analysis, Western Sydney, NSW".

Chapters two and three contain the following for each section of the original reports:

- A brief summary of the findings in the original documents under review.
- An assessment of the validity of the stated findings in reference to its methodology, assumptions and calculations.

Chapter four contains an assessment of the information provided against the strategic intent of the objectives for industrial and employment lands in the draft Greater Sydney Regional Plan, draft South District Plan and the Canterbury Economic Development Strategy. In addition, the information provided is assessed in context of the sequential test framework for rezoning or non-industrial development on industrial land. This test asks three questions:

- Is the land surplus to requirements?
- Is the proposed use needed?
- Is the site a logical place for the proposed use?

Chapter Five contains the conclusions of this report.

SGS's approach to this peer review is not based in any pre-conceived position of what the site should or should not be. The scope of this assessment is limited to the content contained within the supporting documents. This assessment is focused on the validity and quality of the evidence presented, and whether it is sufficient to justify an amendment to the Local Environmental Plan to allow for the development of a residential care facility at this location, currently zoned as a mix of R4 (High Density Residential) and IN2 (Light Industrial).

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[1] Willana Associates, Planning proposal report, 20 – 21 Boorea Avenue, Lakemba – June 2017

2. REVIEW OF KEY AGED CARE DEMOGRAPHIC ANALYSIS

This chapter reviews the data and assumptions presented by Premier Consulting in the supporting document 'Key Aged Care Demographic Analysis'.

2.1   Canterbury SLA Analysis

Population and Population Projection

The Premier Consulting report analyses the current and projected population of the Canterbury Statistical Local Area (SLA). 2011 population by age group is given using ABS census data. Population projections for the population aged 70 years and over are sourced from the Commonwealth Department of Social Services[2] (DSS).

It is noted that the analysis by Premier Consulting was completed in 2015 using 2011 census data and an outdated statistical geography (SLA). Since this time 2016 census data has been published.

In the intervening period 2016 census data has been released with up to date statistical boundaries. It is recommended that thought be given to using these to ensure data is most up to date.

The Canterbury SLA has been used in this section of the report as it encompassed the Local Government area at the time the report was completed. No commentary is provided about the definition of this catchment regarding the likely distance potential residents would be willing to relocate given the goal of 'ageing in place'.

More clarification is sought with regards to the definition of catchment areas and their rationale, particularly considering different boundaries used further into the report, as well as a more general comment on the willingness of target residents to relocate to utilise aged care facilities.

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[2] Commonwealth Department of Social Services - Survey of Disability, Ageing and Carers, 2012: Modelled estimates for small areas, projected 2015. Prepared by the Regional Statistics National Centre, ABS (Release 1: February 2015).

The population projections used by Premier Consulting appear reasonable. Although the DSS projections by SLA no longer appear to be available, small area population projections published by Transport for New South Wales (produced by SGS) have estimated a similar, although slightly higher, number of people in the 70+ age group across the forecast period.

Demand of Residential Places

Demand of residential places is calculated for the Canterbury SLA using the demand ratios published in the DSS Aged Care (Living Longer Living Better) Act 2013.

The calculation of demand for residential places applies a simple ratio of places per 1,000 people aged 70 years and over, and is the same method used by the Commonwealth Department of Social Services. The method has been applied correctly.

It is noted that although aged care provision target ratios are very similar to the 2015 report, a report released by the Department of Health in 2016 sets the 2020 target provision ratio at 78 places, slightly lower than the 80 places set in the 2015 target, with an additional 2 places to be allocated to 'restorative care' aimed at enhancing the physical and cognitive function of people who have lost, or are at risk of losing, condition and independence to improve their capacity to stay independent and living in their own homes.

The release of updated ratios be noted however it is not recommended that the work be amended given the marginal change that it would provide.

Australian Government Department of Health 2016, 2016 Report on the Funding and Financing of the Aged Care Industry, https://agedcare.health.gov.au/2016-report-on-the-funding-and-financing-of-the-aged-care-industry

Existing Supply of Residential Places

Existing supply of residential places is determined for the Canterbury SLA using the Aged Care Service List. A subset of this list, including the suburbs, within the Canterbury Statistical Local Area is given with a total of 687 places.

Analysis and data sourced noted. Note that the June 2016 release of the Aged Care Service list indicates 753 places with the addition of the CASS Residential Aged Care Facility in Campsie.

No action required.

Aged Care Approvals Round (ACAR) Results

Additional approved places are listed in the report using the results published for the 2012-13 and 2014 round. The report identifies an additional 78 places.

Analysis noted. No additional ACAR places were identified in Canterbury by this review in the 2015 and 2016-17 ACAR rounds published since the report was written.

Demand versus Supply

A simple difference between the projected demand and current/approved supply is calculated for each projection period. This analysis shows a shortfall of 491 beds in 2011 increasing to 822 in 2026.

> Analysis noted. The use of Canterbury SLA as a closed catchment to determine the difference between supply and demand does not consider movement from people outside the area or supply in neighbouring suburbs.
>
> **It is recommended that more clarification is provided regarding the definition of catchment areas with regards to willingness of target residents to relocate. This is particularly important given the specific cultural nature of the proposed facility. A district-level catchment may be considered to be more appropriate.**

Refundable Accommodation Deposit (RAD) and Median House Price

The report lists the RAD by room type for several facilities within the SLA using the 'My Aged Care' website. The report states the median house price for the SLA, noting the difference between it and the RAD charged citing the Domain Real Estate Agency.

> The data provided appears accurate however the issue Premier Consulting are seeking to articulate is not clear. SGS understands this is a way of demonstrating that given the relatively high RAD coupled with the relatively low median house price and level of home ownership that this is used as an argument for additional supply of residential aged care facilities targeted at a lower socio-economic market, however, this is not made explicit in this section.

Weekly Income of Population Aged 70+; Need for Assistance, Home Ownership;

The report summarises 2011 ABS census data on these topics in relation to the 70+ population. This data reports lower home ownership rates, lower incomes and higher need for assistance in the SLA when compared to state-wide measures.

> Analysis noted. Note that 2016 census data is now available.

2.2   Catchment Area Analysis

Catchment Area Rationale

Premier Consulting have defined a larger catchment for their analysis of the target demographic for the proposed aged care facility, namely 70+ aged Lebanese Muslims, Arabic Speaking Muslims and Muslims. They have used three Commonwealth defined Aged Care Planning Regions spanning Western Sydney.

The use of a larger catchment in this section of the report than for section one (Canterbury SLA) is justified given the unique nature of the proposed facility as one of the only residential aged care facilities catering specifically to Muslim residents. Nevertheless, the chosen catchment is very large and no commentary is provided as to whether this catchment is the most appropriate with regards to the likely distance potential residents would be willing to relocate given the goal of 'ageing in place'.

It is recommended that more clarity could be provided regarding the justification for the size of the catchment for the Key Aged Care Demographic Analysis. The catchment should consider of any existing or additional proposed Muslim specific residential care facilities since the report was written.

The report states that the facility is intended to service Muslim communities in the broader Western Sydney Area and has used three aged care planning regions. Nevertheless, the site sits in the South-Eastern corner of this catchment and is closer to planning regions to the east and south than the southern extent of the West Sydney Aged Care Planning region (see Figure 1). Further clarification could be provided regarding the selection of this catchment.

If it can be demonstrated that the facility will attract residents from all over greater Sydney, it is recommended that all aged care planning regions in the metropolitan region are used instead.

In addition, Aged-Care planning regions are based on the most recent statistical geographies (Australian Statistical Geography Standard (ASGS)) produced by the ABS. The analysis by Premier Consulting has utilised 'Statistical Local Areas' from the older 'Australian Standard Geographical Classification' retired in 2011 which reflect the chosen catchment area less closely.

If the analysis were to be redone it is recommended that Statistical Area 2 (SA2s), the most recent statistical geographies from the Australian Statistical Geography Standard (ASGS) are used.

FIGURE 1 – CATCHMENT USED BY PREMIER CONSULTING (MAPPED BY SGS)
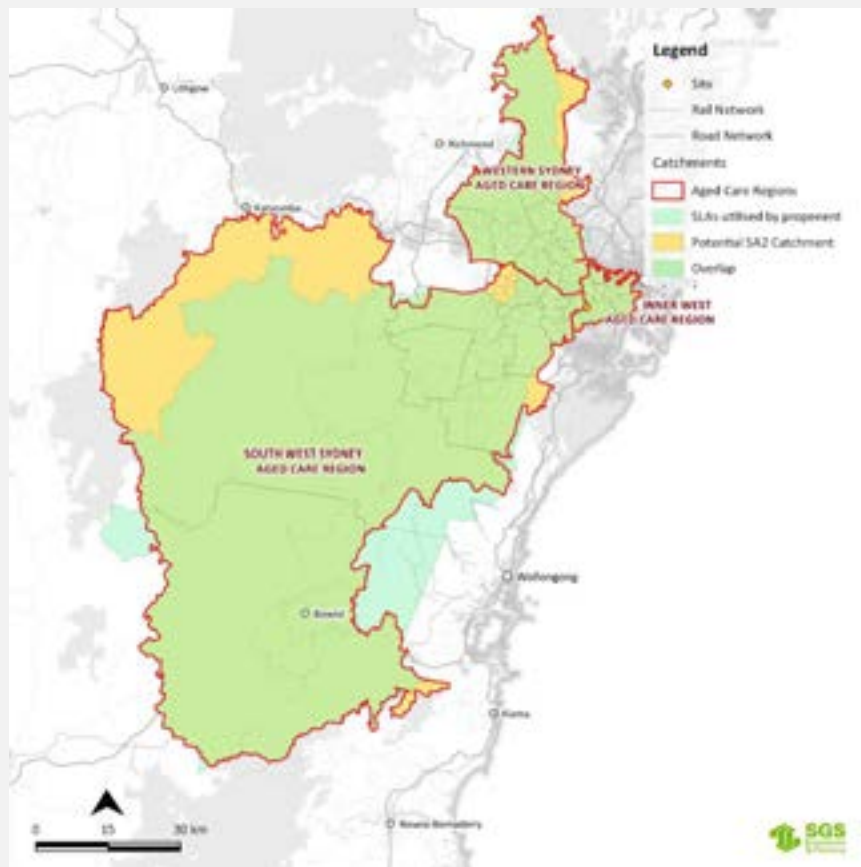
Source: SGS Economics and Planning 2017

General Profile of Catchment Area

Summary of 2011 census statistics regarding ancestry, language spoken at home, country of birth and proficiency in English in the study catchment area.

Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Lebanese Muslims & Arabic Speaking Muslims & Muslims

Tables of statistics by SLA within the catchment relating to the male and female population numbers for each interest group, ending with a statistic for the total 70+ Muslim population.

Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Projected Growth in the Aged Population

A demand analysis is undertaken by applying the DSS demand ratios to projected population for each gender and group (Lebanese Muslims, Arabic speaking Muslims and Muslims).

The grow rates applied to the 2011 70+ population in each demographic group for each forecast period are very high (50-70%). The report does not outline a specific methodology for determination of the growth rate applied. Although the DSS projections by SLA used in the report no longer appear to be available for download, numbers extracted earlier in the report for Canterbury SLA indicate a growth rate in the general 70+ population for each forecast period closer to 10-20%. Small area population projections published by Transport for New South Wales (produced by SGS) for the catchment area indicate a growth rate in the catchment of the general 70+ population of between 15-25% for each forecast period.

It is recommended that more clarity is provided regarding the methodology used to determine the growth rate for the target demographic and ensure its accuracy. Premier Consulting should provide the data either through a link or in an appendix.

Weekly Income, Home Ownership and Need for Assistance

The report summarises 2011 ABS census data on these topics in relation to the 70+ population within the broader Western Sydney Catchment. This data reports lower home ownership rates, lower incomes and higher need for assistance for the Muslim population within the catchment when compared to the NSW average.

Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

2.3   National Trends

This section of the report estimates the prevalence of dementia among the Lebanese Muslim, Arabic Speaking Muslim and Muslim populations assuming the same ratio as reported by the Alzheimer's Australia organisation.

Analysis and data source noted.

2.4　Summary of Key Aged Care Demographic Analysis

The report has demonstrated demand in the general population for aged care in the immediate catchment (former Canterbury LGA boundaries) although it has not specified whether places at the proposed facility are open to those outside the Muslim faith.

The report has demonstrated a demand for aged care in the Muslim population within a very large catchment of Western Sydney extending south of Wollongong. The report has not specified whether the catchment is an accurate reflection of how far intended residents are anticipated to relocate. Although it is anticipated that such a specialist facility would attract residents from a wider catchment, conventional aged care policy promotes 'aging in place' for which the current catchment is too large.

In addition, growth rates applied to the various Muslim demographic groups are much higher than the forecast rate for the general 70+ population. The report does not outline a specific methodology for determination of the growth rate applied.

It is recommended that the report provides additional information regarding:

- Whether the facility is open to the general population
- The amendment of, or justification for, the existing catchment used
- The amendment of, or justification for, the growth rates applied to target demographic groups within the catchment.

3. REVIEW OF WORKFORCE SUPPLY ANALYSIS

This chapter reviews the data and assumptions presented by Premier Consulting in the supporting document 'Workforce Supply Analysis'.

3.1 Catchment Area Rationale

Catchment Area Rationale

Premier Consulting have defined a larger catchment for their analysis of the target demographic for the proposed aged care facility, namely 70+ Lebanese Muslims, Arabic Speaking Muslims and Muslims. They have used three Commonwealth defined aged care planning regions.

Similar to section 2.2 above, further clarification is required regarding catchment selection. By using aged care planning regions in the selection of the catchment for the workforce analysis, Premier Consulting has not addressed the concept of reasonable travel time.

Figures 2 and 3 below based off the Transport for New South Wales Strategic Transport Model allow comparison between the geographical extent of the chosen catchment and catchments based on a 30 or 60-minute travel time to the site, based on private and public transportation. Although it may be reasonable to extend the travel time catchment for workers given the specialised nature of the facility it is considered that the current catchment is too large.
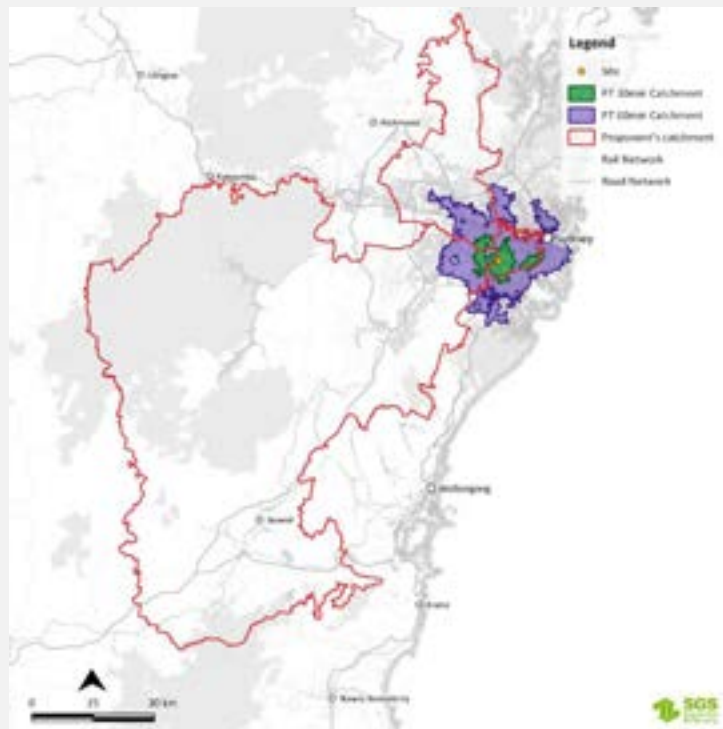
It is recommended that the catchment definition take workforce movement better into account.

FIGURE 2 – PRIVATE TRANSPORTATION 30 AND 60 MINUTE TRAVEL TIME CATCHMENT (MAPPED BY SGS)
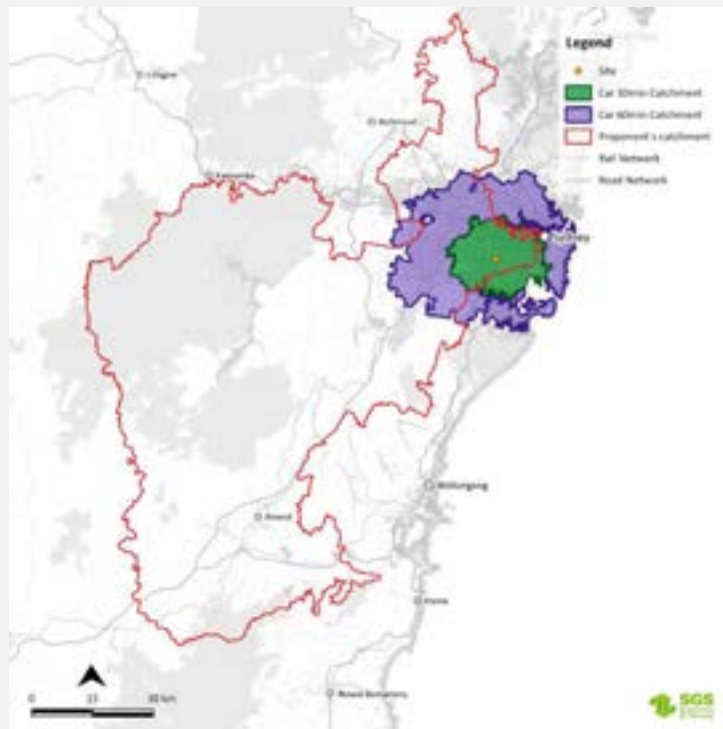
Source: SGS Economics and Planning 2017

FIGURE 3 - PUBLIC TRANSPORTATION 30 AND 60 MINUTE TRAVEL TIME CATCHMENT (MAPPED BY SGS)

Source: SGS Economics and Planning 2017

3.2 Existing Workforce Analysis

Workforce Analysis by Employment Labour Status

This section of the report presents 2011 census data relating to the workforce within the catchment, identifying the number of people employed in the aged care residential services industry.

> Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Workforce Analysis by Supply Level Comparisons

Calculates the number of workers in the aged care residential services industry per 1000 people aged 70+ in the catchment using 2011 census data. Concludes that there is a higher level of workforce supply than the NSW average.

> Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Workforce Analysis by Age

Calculates the number of workers in the aged care residential services industry by broad age group in the catchment using 2011 census data. Concludes that the average age of the aged care residential services workforce is higher than the all-industries average.

> Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Workforce Analysis by Gender

Calculates the number of workers in the aged care residential services industry by gender in the catchment using 2011 census data. Shows that the female proportion of the aged care workforce is significantly larger than the male population.

> Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Arabic Speaking Workforce

Calculates the number of workers in the aged care residential services industry who are Arabic speakers in the catchment using 2011 census data. Shows that most Arabic speaking aged care workers are located within the Western Sydney Catchment.

Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

Workforce Analysis by Occupation

Breakdown of direct care occupations as a proportion of the total aged care workforce showing Personal Care Attendants make up most of the workforce.

Analysis noted and extracted census data appears to be correct, allowing for small differences created through randomisation of small category counts. Note that 2016 census data is now available.

3.3   The Aged Care Workforce in Australia

Assesses the profile of the aged care workforce in Australia through reports by aged care industry organisations. The information presented highlights several issues including staff and skills shortages in the industry, retention and gender balance. Gender balance of nursing staff is particularly a concern given gender segregation of the proposed facility. Premier Consulting then summarises many future issues discussed by the ACSA.

Analysis noted. Conclusions appear reasonable, nevertheless, more clarity is requested regarding the relevance of skills shortages and recruitment difficulties for the development approval.

It is recommended that the relevance of the information presented in the analysis in the context of the proposed development approval is made clearer.

3.4   Summary of Workforce Analysis

The report has demonstrated that the proposed facility would provide employment on site.

The report demonstrates that it may be difficult to source Arabic speaking staff for the proposed gender-segregated facility within the defined catchment, although the relevance of the information presented in context of the proposed development approval should be made clearer. In addition, the catchment selected for the analysis covers a very large area of Western Sydney extending south of Wollongong, exceeding a reasonable travel time catchment for a daily commute.

It is recommended that the relevance of the information presented in the analysis in the context of the proposed development approval is made clearer and that the catchment area is redefined for any new workforce information provided.

4. POLICY REVIEW

4.1 Strategic Policies

Strategic planning objectives for employment lands are laid out in the draft Greater Sydney Regional Plan (2017), revised draft South District Plan (2017) (both from the Greater Sydney Commission) and the Canterbury Economic Development Strategy (2009).

Draft Greater Sydney Region Plan

The Draft Greater Sydney Region Plan sets the strategic planning vision for Sydney as a metropolis of three cities. The site and LGA is within the South District. While the Plan does not specifically assign districts to the three cities, the plan summary indicates that the South District forms the lower part of the Eastern Harbour City (page 7 of the Draft Greater Sydney Region Plan).

Objective 23 of the Plan seeks to ensure that industrial and urban services land is planned, protected and managed and takes a metropolitan perspective. Due to land use pressures in the Eastern Harbour City, the plan recommends to "Protect all industrial zoned land from conversion to residential development, including conversion to mixed-use zonings". The report supporting this Objective, prepared by SGS Economics and Planning in 2017[3], indicates that urban services land in the South District is under pressure and should be protected.

> **In accordance with the policy direction of the Draft Greater Sydney Region Plan, the loss of industrial land at this site would not be supported.**

Revised Draft South District Plan

Planning priority S10 in the revised draft South District Plan outlines a number of objectives for 'protecting and managing industrial and urban services land'. The plan acknowledges that the current supply of industrial land per capita is below the benchmark level in 2016 and that this per capita amount is forecast to decrease in the period to 2036. Action 38 of the Draft Strategic Plan states "Manage industrial land in the South District by protecting all industrial zoned land from conversion to residential development, including conversion to mixed-use zones".

> **Based on a review of the information provided, the proposed development for a residential aged care facility use does not meet the planning priority within the Revised Draft South District Plan.**

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[3] SGS Economics and Planning, 2017 'Sydney's Urban Services Land: Establishing a Baseline Provision'

Canterbury Economic Development and Employment Strategy (2008)

The Canterbury Economic Development Strategy was prepared by SGS in 2008 for the former City of Canterbury. It remains the current policy position of the Canterbury Bankstown. The strategy examines employment and employment lands within the former Canterbury LGA boundary and identifies strategies to preserve and enhance these. The site falls within the Lakemba Precinct. The site is within the light industrial zone of the proposed strategy. The strategy indicates that there may be opportunities for new employment uses, residential or live-work arrangements within the area of the precinct fronting Hugh Street.

> **Based on a review of the information provided, the proposed development for a residential aged care facility could fit within the definition of residential as outlined in possible strategic directions for the precinct.**

Strategic Policy Summary

The 2008 study, undertaken by SGS, identifies an opportunity for some sites within the Lakemba industrial precinct to accommodate other, non-industrial uses. However, this was based on the old 2007 Draft Subregional Plans and these have since been superseded by the new Draft Greater Sydney Region Plan and Revised Draft South District Plan. Both these plans identify that industrial lands in South District should be preserved to ensure sufficient supply of land for future demand.

> **On the basis of policy hierarchy, the proposal to introduce new, non-industrial uses into the Lakemba precinct would not be supported.**

4.2   Sequential Test for Land-Use Change

In addition to the strategic policies, a sequential test framework for rezoning to non-industrial development on industrial land is a useful framework from which to assess a proposal on its individual merits. This has been applied in past peer reviews by SGS for Canterbury Bankstown. This test asks three questions:

- Is the land in its current use surplus to requirements?
- Is the proposed use needed?
- Is the site a logical place for the proposed use?

The following sections evaluate the information provided within the two Premier Consulting Reports against these questions.

Is the Land Surplus to Requirements?

Neither report addresses whether the current use on the site is required or whether the land is surplus to requirements. No evidence has been provided to demonstrate that supply of industrial land in the LGA is sufficient to meet future demand, or that the site specifically is unsuitable for continued use under its current zoning. In lieu of evidence provided, this peer review refers to Objective 23 of the Draft Greater Sydney Region Plan and its supporting documentation that indicates a general shortage of land for these types of urban service uses in the South District.

Is the Proposed Use Needed?

Notwithstanding methodological concerns, namely catchment size and forecasted population growth rates, the report appears to indicate that there is both a growing and ageing Muslim population, and therefore a demand for the proposed use. It is noted that the report does not identify whether there are other care facilities for this population in the surrounding area that may be able to accommodate this future demand.

Is the Site a Logical Place for the Proposed Use?

Although the Key Demographic Analysis identifies a need for Muslim specific aged care facilities, the supporting reports do not address why this specific site is required over other sites within the chosen catchment and whether there are alternative locations in appropriately-zoned areas that could satisfy this need.

In addition, the supporting reports do not provide evidence of net community benefit, which would involve a comparison of the benefit of the proposed use against the cost of losing the site for industrial and urban services purposes, for example, using a cost benefit or multi-criteria analysis framework.

SGS acknowledges that site-specific characteristics are often not factored in to District or Metropolitan-level studies. This issue notwithstanding, the information provided in support of this application does not provide site-specific justification for the proposed development in terms of the benefit of the proposed use over the cost of losing the existing industrial use of the site. Based on the information provided, SGS finds insufficient justification to warrant rezoning or change of use on site.

5. CONCLUSIONS

This chapter provides an overview of SGS's conclusions regarding Premier Consulting's two reports and what should be provided to support the proposal.

5.1   Summary of Issues

The reports by Premier consulting investigate two specific components of the development namely demand for the proposed facility and size of the aged care workforce. Given these reports on their own don't specifically advocate for change of land use SGS has provided insights in two forms. The first is specific to the data contained within the two reports. The second is through a review of the content against strategic planning objectives and the sequential test lens as a way of assessing additional uses on site.

Broadly, given the data focus of these reports, SGS has no major concerns with the data provided as much of it is directly sourced from government data sources such as the 2011 census and aged care service lists. However, the following reflections are made:

Inconsistency of catchment definitions

Two different catchments are used in the 'Key Aged Care Demographic Analysis' report, the small Canterbury SLA, and then a very large Western Sydney catchment spanning three aged care regions. The use of a catchment larger than the Canterbury SLA is considered justified given the specialised nature of the facility, nevertheless, the chosen catchment is very large, and no commentary is provided as to whether this catchment is the most appropriate with regards to the likely distance potential residents would be willing to relocate given the goal of 'ageing in place'.

The large Western Sydney aged care planning regions catchment is again used in the 'Workforce Supply Analysis' report. By using aged care planning regions in the selection of the catchment for the workforce analysis, Premier Consulting has not addressed the concept of reasonable travel time relevant when estimating the total available workforce.

Lack of clarity around relevance of some report sections and no clear link between reports and the planning application

In the 'Key Aged Care Demographic Report' demand is referred to in broad terms without an understanding of how other non-Muslim specific facilities may meet this demand. In the Workforce Supply Analysis more clarity is requested regarding the relevance of skills shortages and recruitment difficulties for the development approval.

Growth rate calculations

Growth rates used for target demographic groups for each forecast period are very high (50-70%). Population projections for the general 70+ population for each forecast period in the catchment are closer to 10-20%. It is recommended that more clarity is provided regarding the methodology used to determine the growth rate for the target demographic and ensure its accuracy. Premier Consulting should provide the data either through a link or in an appendix.

Inconsistency with strategic policy

The draft Greater Sydney Regional Plan (2017) and revised draft South District Plan (2017) of the Greater Sydney Commission, and the Canterbury Economic Development Strategy (2008) all identify a critical shortage of industrial and urban services land in the district. Based on a review of the information provided, the proposed development for a residential aged care facility use does not meet the strategic objectives to preserve industrial and urban services land.

Site specific justification

Separately, the sequential test approach considers that validity of an argument for rezoning for a change of use in exceptional cases through the following three tests:

- Is the land surplus to requirements?
- Is the proposed use needed?
- Is the site a logical place for the proposed use?

While the two reports demonstrate that there is likely to be demand for this use in the Sydney Metropolitan area, neither report addresses whether the current use is no longer needed and that the site can accommodate an additional use (residential aged care) which, in the case of an IN2 zoning, will fundamentally alter the role and function of the site.

The reports do not compare the wider social benefit of the proposed use over the existing and they do not consider whether there are alternative sites where this facility can locate. In addition, the supporting reports do not provide evidence of net community benefit, which would involve a comparison of the benefit of the proposed use against the cost of losing the site for industrial and urban services purposes, for example, using a cost benefit or multi-criteria analysis framework.

5.2   Conclusion

The information contained within the two reviewed reports and the application itself do not provide sufficient justification for the loss of industrial use on that site at 20-21 Boorea Avenue, Lakemba. The supporting document does not sufficiently establish an argument for necessity and does not provide any evidence as to why the existing industrial use should make way for the proposed age care facility. In LGAs such as Canterbury Bankstown, there is limited to no opportunity to create new industrial land, given the competition such areas have for higher value land uses such as residential. Coupling this with a shortage of supply of industrially-zoned land in the Eastern Harbour and Central Cities creates a necessarily high hurdle to be passed to justify the loss to other uses.

SGS recommends that a clearer understanding of the impact that the introduction of a non-industrial use in this precinct be presented, possibly by comparing the benefits of the proposed use over the current use.

Based on the information provided in support of this application, SGS finds insufficient justification to warrant rezoning or change of use on site.

Contact us