



**Amaroo Care Services Inc**

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29 October 2109  
David Schober  
Acting Chief Executive Officer  
Shire of Denmark  
PO Box 183, Denmark WA 6333

**Re : Lot 366, #68 Horsely Road, Denmark  
Development Application – Change of Use/Proposed Use  
Aged care facility and associated uses**

Dear David,

This correspondence is provided as support for the attached Application for Development Approval.

**Purpose :** Amaroo Care Services Inc (Amaroo) seek the approval (absolute majority) of the Council of the Shire of Denmark to the proposed uses for Lot 366 Horsley Road.

**Background**

Lot 366 (#68) Horsley Road, Denmark is 7.1581ha in area and is zoned Residential 'R20' by the Shire of Denmark Town Planning Scheme No.3. The property is covered by an adopted Structure Plan (Horsley/Rockford Road Local Structure Plan – as attached) that establishes the future subdivision pattern for this property.

Amaroo have selected Lot 366 as their preferred location to build a new aged care facility, on a part of the land. Whilst the overall land area of Lot 366 is far more than Amaroo need for this purpose, it well situated in terms of proximity to the centre of Town and also the local hospital. It is also a very attractive piece of land with excellent views across to the Inlet (south) and the valley (east to north). Amaroo propose to utilize about 2-2.5Ha of the land to build an aged care facility, with associated uses. Amaroo are not land developers and would later seek to sell the residual land to land developers to complete the future subdivision in accordance with the Structure Plan.

**Allocation of Licenses**

In the evaluation by the Commonwealth to award Amaroo a conditional allocation of bed licences, our submission required us to nominate a particular allotment of land. At that time Lot 3002 Hardy Street was nominated in the submission. Following a BAL assessment, it was evident that a substantial section of land would be lost to development, due to the buffer required from the bushfire assessment. Accordingly it was necessary for Amaroo to source an alternate location for the project. Amaroo will seek the approval of the Commonwealth to the selection

19 November 2019 - Attachment 8.1.1a



of Lot 366 as the alternate preferred site. Amaroo will require the endorsement of the Shire as supporting evidence, in order for Amaroo to approach the Commonwealth and seek a Variance as to the nominated land site.

#### **Proposed use of Lot 366.**

Amaroo have received an allocation of Licenses to provide aged care places from the Commonwealth for 40 residents. Aged care facilities, particularly in a regional location, need to be more than just an arrangement of beds. The buildings and design need to accommodate a range of service offerings to promote the quality of life and wellbeing of the residents and their stakeholder families and social relationships within the community. Accordingly there are other activities that take place within and around a care facility to embrace social interaction and activities, including –

- occupational therapy and physiotherapy,
- wellness programs
- Day centre activities

Also, given the regional nature of the facility, Amaroo is also intending to incorporate accommodation options for spouses/partners and shift staff . Assisted living units can allow the partners and spouses of care residents to reside in very close proximity and not be separated at a time of life when their needs are greatest.

A small number of units for staff accommodation are planned in order to be able to attract and retain staff from the surrounding community. Staff retention is critical to be able to successfully operate in this industry.

Typically a facility of this type also requires adequate functional amenities including carparking areas and maintenance and workshop space.

As a regional centre, Amaroo would also base their administration in this facility for other service activities, including Home care and Village Management.

#### **Growth**

Amaroo would intend to allocate enough land as a part of this project to ensure that the facility and or amenities could be increased and grow, should the demand from the community increase over time. This may allow for more care options or more accommodation for seniors.

#### **Supporting Local Resources**

Amaroo are very strong supporters of sourcing local resources. It is anticipated that Amaroo would seek the involvement of local health care and service professionals in order to run the care support business and services. These would include;

- General medical practitioners
- Pharmacy
- Physio and OT
- Massage and podiatry
- Hairdresser
- Cleaners
- Contract gardeners etc



By proposing a composite type facility, it should not be construed that Amaroo may take business away from other business and services in town or the local community. Instead, the reality is the opposite – Amaroo would use those local services within their operations.

#### **Traffic Management**

Amaroo management have been involved in many more substantial care facility projects in the metropolitan area. Traffic management has been proven on all occasions to not be an issue in such a project. It has been established on all occasions that the traffic generated from an aged care facility, is substantially less than the normal traffic movements produced by a typical residential (R20) development. Whilst Horsley Road is very low in current traffic levels, it is obviously due to the location being on the very fringe of the developed Denmark township and not connecting to any other built up areas. Once the overall ODP is fully developed in many years to come, then the traffic in Horsley Road will be at normal levels. Vehicular traffic that services an aged care facility is generally focussed across two shift change times per day. Neither of these time conflict with either peak hour traffic for workers, nor school start/finish times. Accordingly traffic management of potential conflicts is not an issue.

#### **Preferred location of land**

Amaroo have elected to locate the aged care facility and associated uses on the highest section of the property, abutting Horsely Road. The main reasons for this are;

1. The land in this area has the least contour( ie it has the least slope),
2. It has the most appealing outlooks for the benefits of the residents,
3. It has dual street frontage , which can assist with access and egress and best positioning of driveways,and
4. It can practicably and easily be aligned with the Structure plan such that the overall intent and layout of the structure plan is preserved.

#### **Availability of Services**

All services are available to the land. It is noted that the land has a current subdivisional approval for the development of residential allotments. All servicing and geotechnical studies have already been undertaken that demonstrate the suitability of the land and these have previously been submitted to the Shire/Council and the WAPC through the previous process.

#### **Contour and elevation**

Lot 366 is an elevated site. Almost all land in Denmark is elevated and has a substantial contour/slope. Whilst the difference in ground levels between the township and the site may be more than some other land options in Denmark, this is not of significance given the mobility profile of the future residents. By the time that a typical resident is assessed as requiring the higher levels of aged care and is then admitted into a care facility, they are highly unlikely to have any pedestrian capability. Unfortunately the current profile of aged care residents across the country is more aligned to end of life scenarios.

#### **Alignment with Structure Plan**

Amaroo are currently developing concept plans that will best utilise the site for the designated uses, whilst integrating with the current Structure Plan and the layout principles.



## Summary

The Shire has previously provided the following supporting advice in regard to the site, location and proposed use.

"Having regard to the purpose and intent of zones in Town Planning Scheme No. 3 (Clause 3.1.3) and the reference in the Shire's Local Planning Strategy (2011) under "Future Residential" which states "Council support private and public developments of aged accommodation in suitable locations having regard to issues including but not limited to close proximity to commercial and community facilities, good accessibility (both vehicular and pedestrian access) and topography of the site having regard to the nature of the occupants", it is considered that the most appropriate zone for an Aged Person Village would be in the 'Residential zone' as it pertains to the Denmark townsite, thus this site does have merits accordingly."

Amaroo have a Conditional Contract of sale for Lot 366 and in the very near future have to determine to proceed to purchase the land, or not. There are a few critical aspects which Amaroo require certainty on, prior to committing to the purchase of the land.

Those that involve the Shire/Council include;

- Endorsement/Approval of the Council to ;
  - the proposed land uses
  - The partitioning of an area of land of approximately 2-2.5Ha on the western portion of Lot 366 for the proposed uses.

Once having received the support of Council for this proposal and land use, then Amaroo have to consult with the Commonwealth to seek their support to change the nominated location for the aged care facility.

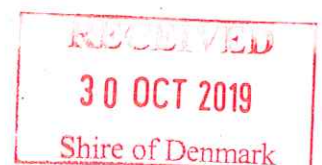
Amaroo fully appreciate that a detailed Development Application would be required at the appropriate time, once design plans have been completed. This submission would need to address;

- Amending the existing Horsley/Rockford Local Structure Plan to include the proposed development whilst clearly showing how the major elements of the structure plan would be retained (i.e. drainage, road connections, Public Open Space, etc).
- Addressing the quite steeply sloping nature of the site to ensure development meets the gradient requirements for access and universal design of buildings.
- Would be subject to public advertising and the final decision of the Council of the Shire of Denmark.

## Request for Recommendation;

That Council approve this proposal by Amaroo to build an aged care facility, with associated and ancillary uses, which may include but may not be limited to;

- occupational therapy and physiotherapy,
- wellness centre and programs



- day centre activities
  - Administration( regional)
  - Assisted living units
  - Overnight staff accommodation
  - Maintenance and workshop
  - Spaces for local service provisions -eg Pharmacy, GP, Podiatry, Hairdresser, Massage etc
- on a portion of Lot 366 Horsley Road, Denmark.

If there is any further information that we can provide, please contact the writer.

Thank you for your consideration.

Yours faithfully,



Rob Spencer

Manager Property & Assets.





Department of Planning,  
Lands and Heritage



# Draft Position Statement: Residential aged care

October 2019

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This document is available in alternative  
formats on application to the  
Communications Branch.

19 November 2019 - Attachment 8.1.1b

## 1. Policy intent

This document outlines the Western Australian Planning Commission's (WAPC) interim requirements to support the consideration and provision of residential aged care within the local government planning framework in Western Australia. It seeks to remove planning process barriers and encourage the provision of an appropriate supply and diversity of residential aged care options by establishing a consistent, simplified and streamlined approvals framework supported by a strategically-led system. It is proposed to complement existing government policies and services for the aged.

When reviewed and where relevant, the WAPC will support amendments to incorporate the statutory content from this Position Statement into the Planning and Development (Local Planning Schemes) Regulations 2015 as model or deemed provisions.

## 2. Residential aged care in Western Australia

Our population is ageing at a faster rate than ever before. The number of older Australians will more than double in the next 40 years. At a State level, WA Tomorrow forecasts an 86 per cent increase in people aged over 85 by 2031. The challenges arising from this trend in population demographics is often recognised as one of the megatrends affecting global society.

An ageing population impacts on all aspects of community life, including the economy, and options to address these impacts are complex and multi-faceted. The implications of inadequate planning to support the needs of our ageing population are significant and include, but are not limited to, increased Federal and State government housing and health care services and associated funding, and increased costs to retrofit existing developments to accommodate aged persons' needs.

Within the State planning framework, State Planning Policy 7.3 Residential Design Codes Volume 1 (R-Codes) provides density bonuses to encourage greater provision of housing developed for aged or dependent persons. However, these provisions alone are not expected to meet the growing demand and changing

needs of the industry, including increased consumer desire for choice and flexibility to age in place and expectations in relation to lifestyle, entertainment options and affordability.

The growth in an ageing population, coupled with more complex needs due to increases in life expectancy and changing patterns of disease, will result in an increased demand for options that support a flexible transition from independent living to residential aged care.

Residential aged care facilities provide a range of care options and accommodation for older people who are unable to continue living independently in their own homes. The type of care provided ranges from personal care to assist with activities of daily living through to nursing care on a 24-hour basis. Flexible aged care delivery models that provide for transitioning needs are desirable for consumers and assist in creating a competitive and viable business product.

The provision of personal and/or nursing care within residential aged care facilities is what distinguishes this type of land use from other types of accommodation for the aged, such as retirement villages where residents live independently. Retirement villages are complexes of residential units or separate complexes of residential units on common land. They may be privately owned or owned by not-for-profit organisations.

A strategically-led planning system that incorporates appropriate incentives to encourage investment in the provision of aged persons' housing and residential aged care, is considered the key to facilitating a streamlined approval process and consistent decision-making.

### 3. Application of this policy

This position statement applies to the preparation and assessment of local planning strategies, local planning schemes and local planning policies throughout Western Australia.

### 4. Policy objectives

This position statement seeks to achieve:

- consistent strategic planning consideration of aged care needs in local planning/housing strategies
- consistent statutory planning guidance to standardise aged care-related land-use definitions and zoning permissibility in local planning schemes.

All other inter-related issues that impact on seniors' housing, affordable housing and changes to the R-Codes are outside the scope of this position statement.

### 5. Policy measures

#### 5.1 Strategic planning considerations

##### Local planning strategies and/or local housing strategies

All local planning strategies and/or local housing strategies should consider, evaluate and provide for future aged care needs by incorporating a dedicated section within the strategy that details:

- existing and future projected demographic profiles for aged persons applying WAPC's WA Tomorrow data
- existing and future projected aged persons' housing and residential aged care needs across the municipality
- medium to long-term aged persons' housing and residential aged care (beds) provision targets aligned to projected future demand
- incentives intended to be outlined in local planning schemes, local planning policies and other long-term local government strategies to facilitate increased supply, including:
  - development-based incentives such as density, height and plot ratio bonuses
  - other mechanisms such as surplus land sales/lease/joint venture programs



- the identification of suitable sites based on appropriate locational criteria such as zoning, proximity and accessibility to services
- consideration of acceptable development standards, including built form outcomes, design criteria, streetscape requirements, permissible height, density and development setbacks.

Future residential aged care needs identified in local planning strategies and/or local housing strategies must translate into locations, sites and densities in local planning schemes in accordance with the statutory planning requirements below.

### Local planning policies

It is preferable for a local government's position on aged care to be formalised within a local planning strategy and/or local housing strategy. Where this is not possible, or as an interim measure, local planning policies may be used to supplement the local government's position on aged persons' housing and residential aged care facilities.

## 5.2 STATUTORY PLANNING REQUIREMENTS

### Local planning schemes

Local planning schemes should align to the local planning strategy and/or local housing strategy content to facilitate the streamlined delivery of identified aged care needs.

Where applicable, local planning schemes should contain the following land use definitions:

#### **Residential aged care facility:**

a residential facility providing personal and/or nursing care primarily to aged or dependent persons which, as well as accommodation, includes appropriate staffing to meet the nursing and personal care needs of residents; meals and cleaning services; furnishings, furniture and equipment. This may consist of multiple components that include residential respite (short-term) care, aged or dependent persons' dwellings and a retirement village, but does not include a hospital, rehabilitation or psychiatric facility.

**Retirement village:** a development with self-contained, independent dwellings for aged or dependent persons together with communal amenities and land uses incidental and ancillary to the provision of such

accommodation, but does not include a development which includes these features as a component of a residential aged care facility.

Where applicable, 'residential aged care facility' and 'retirement village' should be classified as permitted 'P' land uses in residential zones in the local planning scheme zoning and land use classification tables, unless sufficient justification on proper and orderly planning and locational grounds is provided by the local government to otherwise allocate a discretionary 'D' or 'A' land use permissibility.

In industrial or similar zones where sensitive land use conflict exists, residential aged care facilities and retirement villages should be prohibited 'X' land uses. In all other zones, such as rural, residential aged care facilities and retirement villages should be discretionary 'D' or 'A' land uses.

Incidental and ancillary amenities and land-uses associated with and supporting residential aged care facilities and retirement villages (for example medical consulting room, pharmacy, café and the like) that are accessible for residents only should be considered and determined under the above new land-use definitions.

Amenities and land uses associated with and supporting residential aged care facilities and retirement villages that are accessible to both residents and the

general public should be considered as separate use classes and determined in accordance with the land use classification table under the local planning scheme.

All other aged care-related development proposals that fall outside the above new land use definitions should be considered and determined under the R-Codes and appropriate zoning and land use classification table in the local planning scheme.

### Development approvals for residential aged care facilities and retirement villages

Residential aged care facilities and retirement villages are encouraged within residential zones, in line with the local strategic planning framework (section 5.1).

A Local Development Plan (LDP) should be prepared if development standards for residential aged care facilities and retirement villages are not specified in the local planning scheme or strategic planning framework.

A LDP should ensure the development is compatible and integrated with streetscape(s) and existing or future desired built form of the locality. LDPs must outline built form requirements, including, but not limited to, building height bulk and scale, open space, setback, access, parking, landscaping, servicing and drainage, visual privacy, solar access and other relevant development requirements.

**Development approvals for proposals that include aged or dependent persons' dwellings assessed under the R-Codes**

Clause 5.1.1 C1.4i of the R-Codes provides a density bonus for aged or dependent persons' dwellings. If desired, this clause may be applied to eligible component(s) of a residential aged care facility or retirement village proposal. In these cases, the calculation to determine the number of permissible dwellings should be limited to the eligible portion(s) of the development only, consisting of self-contained, independent aged or dependent persons dwellings.

## **6. Definitions**

***Aged person***

a person who is aged 55 years or over.

***Dependent person***

a person with a recognised form of disability requiring special accommodation for independent living or special care.

***Residential aged care facility***

a residential facility providing personal and/or nursing care primarily to aged or dependent persons which, as well as accommodation, includes appropriate staffing to meet the nursing and personal care needs of residents; meals and cleaning services; furnishings, furniture and equipment. This may consist of multiple components that include residential respite (short-term) care, aged or dependent persons' dwellings and a retirement village, but does not include a hospital, rehabilitation or psychiatric facility.

***Retirement village***

a development with self-contained, independent dwellings for aged or dependent persons together with communal amenities and land uses incidental and ancillary to the provision of such accommodation, but does not include a development which includes these features as a component of a residential aged care facility.