

18 March 2026

**Department of Planning, Housing and Infrastructure (DPHI)**

Dear Sir/Madam,

**Re: Management of Non Seniors Housing at IRT Moruya**

We write in response to the Department's comment that the Environmental Impact Statement (EIS) does not clearly address how the essential worker housing component will be managed alongside the seniors housing development. The comment further requests clarification as to how the cabins and manor houses will be made exclusively available to essential workers.

By way of clarification, the cabins and manor houses are intended to provide accommodation primarily for essential (key) workers. These dwellings will be managed separately from the seniors housing component of the development.

**Management and Operation**

The essential worker accommodation (being the cabins and manor houses) will be managed directly by IRT Group. IRT will be responsible for allocation, tenancy management, rental arrangements, and ongoing maintenance of these dwellings, with IRT staff being on-site to manage.

**Intended Occupants**

The multi dwellings (cabins and manor houses) will be primarily used by key workers employed by IRT, including but not limited to:

- Nurses and staff working within the Residential Care Facility (RCF);
- Staff supporting the Independent Living Units (ILUs);
- Local health professionals servicing both the IRT Moruya facility and local hospitals; and
- Other essential support personnel as required for the operation of the broader facility.

In some circumstances, accommodation may also be allocated on a short-term basis (anticipating 1–2 nights) for the visiting family and friends of the residents on-site. Such short-term use will remain ancillary to, and consistent with, the primary use of the site for a co-located seniors housing community together with a component of essential worker housing. .

**Availability and Tenure**

The cabins and manor houses will not be subdivided from the broader development. There will be no separate titling of these dwellings. IRT Group will remain the single title holder and whole owner of the site.

As a consequence of this ownership structure, IRT will retain management over occupancy and allocation of the multi dwellings, ensuring that they are made available exclusively for the purposes as described above.

The accommodation will be rented at market rates and rental arrangements will be administered directly by IRT in accordance with its internal housing and workforce management policies.

We trust this clarification addresses the Department's concerns. Should any further detail be required, we would be pleased to provide additional information.

Kind regards,



**Kevin Pillay**  
**Group Head of Property Development**  
IRT Group