

Your Reference: SUB22/121568  
Our Reference: NCA/14/2022  
Contact: Deepa Randhawa  
Telephone: 9806 5248

5/September/2022

Dear Rajlaxmi,

**SUB22/121568– Senior's Housing Development – 1-5 Brown Street North & 8 Jeffrey Avenue North Parramatta**

**City of Parramatta Submission**

I refer to the proposal for demolition of three (3) existing dwellings and associated structures, tree removal and construction of twelve (12) unit seniors living development comprising six (6) one bedroom and six (6) two-bedroom self-contained units with associated landscaping and fencing, surface parking for nine (9) cars and consolidation into one lot and proposed stormwater easement at 8 Jeffery Avenue, North Parramatta.

Council officers have reviewed the documentation as submitted by the NSW Land and Housing Corporation with respect to this application and wish to make the following comments.

**URBAN DESIGN**

**Density**

- The development appears to be an overdevelopment of the site.  
0.5:1 FSR maximum is permitted under the SEPP Housing. A detailed density calculation as per Council Standards needs to be undertaken and submitted.  
For GFA yield calculations assume:  
Residential GFA = 75% of GBA (GBA includes external walls, internal voids, circulation space and balconies)

**Built Form**

- The bulk and scale of the proposed development is not considered compatible with low scale context (R2 zone).  
The site planning should be reconsidered with the break at the centre of the development to create 2 separate buildings and reducing the perceived density.
- Prevailing setback on Brown Street is approximately 7m; the proposed development appears not to be in line with this setback and should be rectified. A plan with context and its dimensions should be submitted to confirm.  
The location of facilities in the front setback is to be minimised to maximise opportunities for tree planting and screening. Bin enclosure's locations should be relooked at as they are currently in the front setback and in front of proposed houses. Walls, fences, and other structures in the front setback are to be minimised
- It is recommended that the floor-to-floor height is 3.1m (use ADG as a guide)
- The senior housing SEPP 2021 allows 9.5m max height excluding servicing equipment on the roof of a building. For servicing equipment

- (i) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and
  - (ii) is limited to an area of no more than 20% of the surface area of the roof, and
  - (iii) does not result in the building having a height of more than 11.5m
- The proposed housing is compliant with both above controls.


#### **Solar Access and cross ventilation**

- Diagrams showing solar access and cross ventilation should be submitted to show the quality and amenity of the dwellings. ADG and SEPP Housing should be used as a guide.

#### **Materials**

- The use of colorbond is not encouraged. Masonry elements and roof tiles should prevail to achieve a character which is more sympathetic with the local context.

Pitched roof to be explored.



#### **Communal Open Space**

- It is recommended to have at least 25% of the site area as communal open space which is contiguous with deep soil where possible. Use of landscaping to ensure privacy of dwellings from the communal open space is encouraged and should be reflected in the landscape plan.
- The Communal Open space should offer gathering areas to provide opportunity for social interaction amongst residents and provide a variety of informal recreation and outdoor opportunities for residents, connection to the natural environment and valuable 'breathing space' for the senior housing blocks

#### **Carpark**

- City Design recommend that the carpark is relocated in a basement under one of the two separated blocks. This would create a consolidated communal open space area, associated to deep soil zone.

#### **PUBLIC DOMIAN**

##### **Built form setbacks:**

- Front setback is to be in line with prevailing existing street setbacks. The setbacks are compliant. However, the location of facilities in the front setback is to be minimised to maximise opportunities for tree planting and screening. Bin enclosure's locations should be relooked at as they are currently in the front setback and in front of proposed houses. Walls, fences, and other structures in the front setback are to be minimised. Booster valves are to be carefully designed and located so they are not visually obtrusive and do not obstruct opportunity for planting large trees.

##### **Existing Trees**

- Retention of as many existing trees as possible is supported and the proposed development should not impinge on TPZ requirements for significant existing trees that are to be retained. This should be reflected in the drawings with tree protection measures in line with AS standards and the arborist's drawing. Some of the new

proposed trees have been shown too close to neighbouring trees which will affect their growth and these should be relocated

### Deep Soil and Internal landscape

- The SEPP housing 2021 requires for a development application made by a social housing provider—at least 35m<sup>2</sup> of landscaped area per dwelling otherwise at least 30% of the site area is landscaped. Both the developments are compliant in terms of landscape area
- Another requirement of the SEPP is a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 3m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site. A reconfiguration of the site planning will help to achieve this.
- In accordance with council's aspiration to facilitate development in a way that provides for mature tree vegetation and natural shade in the LGA, the applicant is required to provide trees at a rate of 1/80m<sup>2</sup> of landscape area (additional to any existing trees to be retained). The trees must be species capable of reaching a mature height of more than 13m (min dimension 4x4m). The trees are to be planted more than 3m away from any proposed built structure.
- The current landscape plans show many small trees which will not facilitate above aspiration to plant trees capable of reaching more than 13m height. The landscape plan should be modified to reflect larger tree species and updated plan should be submitted to Council.

### Communal Open Space

- The SEPP housing 2021 refers to the *Seniors Living Policy: Urban Design Guideline for Infill Development*, March 2004. One of the design objectives of this guide is to provide internal amenity by providing quality and usable private and communal open space to all residents
- The Public Domain team supports City Project's recommendation to have at least 25% of the site area as communal open space which is contiguous with deep soil where possible. Use of landscaping to ensure privacy of dwellings from the communal open space is encouraged and should be reflected in the landscape plan.
- The Communal Open space should offer gathering areas to provide opportunity for social interaction amongst residents and provide a variety of informal recreation and outdoor opportunities for residents, connection to the natural environment and valuable 'breathing space' for the senior housing blocks

### Private Open Space

- The senior housing should follow the below private open space requirements for a dwelling located on the ground floor of a multi-storey building
  - (i) at least 15m<sup>2</sup> of private open space per dwelling, and
  - (ii) at least 1 private open space with minimum dimensions of 3m accessible from a living area located on the ground floor,
- The open space needs to be accessible only by a continuous accessible path of travel, within the meaning of AS 1428.1, if the dwelling itself is an accessible one—see Schedule 4, section 2 of the Housing SEPP 2021

- (i) for a dwelling in a multi-storey building not located on the ground floor a balcony accessible from a living area with minimum dimensions of 2m
- (ii) and an area of at least 10m<sup>2</sup>, or
- (iii) for each dwelling containing 1 bedroom—an area of at least 6m<sup>2</sup>
- Public Domain team has concerns regarding the usability and required area for the private open spaces in both the developments as the landscape plan shows dense planting in the private open spaces which would make these spaces inaccessible and non-usable and not meeting the design objectives of the SEPP housing 2021 and the *Seniors Living Policy: Urban Design Guideline for Infill Development*, March 2004 to provide internal amenity by providing quality and usable private and communal open space to all residents

### Public Domain

- Public footpath: in accordance with the PPDG 2017. A minimum 1.5m new footpath is to be constructed partly along the boundary to replace the existing footpath is to accompany the removal of existing redundant driveways and construction of new kerb and footpath sections in place is to be carried out in accordance with Councils standard construction drawings (Details available on request).
- Plant new street trees at 8-10m centres along the length of the frontage on in the verge to match the existing dominant large tree species along the street.
- Driveways: maximum preferred width 6m.
- Details of the public domain are to be included in the landscape plan and alignment plans and details are to be submitted to council.

### UNIVERSAL ACCESS

- 1) A comprehensive Access Report by Accessibility Solutions (D08625005) has been provided identifying several issues that will be required to be addressed at the construction certificate (CC) stage of the project. These additional comments are not limited to or replace those mentioned within the access report and does not relinquish the applicant from its obligation to provide a fully compliant detailed universally accessible design.
- 2) Low level thresholds should be provided at all doors accessing outdoor areas.
- 3) The Abutment of differing surfaces shall have a smooth transition. *Design transition shall be 0 mm. Construction tolerances shall be as follows:*
  - (a) 0 ±3 mm vertical.
  - (b) 0 ±5 mm, provided the edges have a bevelled or rounded edge to reduce the likelihood of tripping. **AS1428.1.7.2.**
- 4) Equipment and furniture within outdoor common and recreation areas will require accessible and inclusive features suitable for a person with a mobility and other impairments.
 

Note: AS1428.2 provides guidance on accessible furniture including, reach ranges and varying heights of tables and seats with back and arm rests.

## Summary

1. Ensure compliance with the Accessibility Solutions Access Report.
2. Ensure low level thresholds are provided at the doors accessing the outdoor areas.
3. The abutments of varying surfaces are to provide level transitions.
4. Ensure equipment and furniture provide accessible and inclusive features.

## LANDSCAPE/TREE MANAGEMENT

### Trees

- There are 20 trees located on the site and within the adjoining properties. Of these, 10 trees are proposed to be removed. These are predominantly small / young or exempt and are supported for removal.
- Tree protection will be required to the street (tree 1 *Liquidambar styraciflua*) and the remaining trees located within the adjoining properties.
- Only 3 replacement trees are shown. The number of replacement trees should be increased to reflect 1:1 replacement (10 replacement trees required). Of the replacement trees, it is recommended 2 x replacement street tree planting of *Liquidambar styraciflua* to be planted in the grass verge adjacent to the development to help ensure replacement tree canopy is achieved.
- Within the proposed easement, the SW pipes will impact 4 small fruit trees. Non-destructive construction method such as hydrovac or under-boring will be required to ensure roots over 25mm are retained and minimal impact to occur to the trees. Pipes can be treaded through the roots. Works within the Tree Protection Zone of these trees to be monitored by a qualified AQF Level 5 Consulting Arborist to ensure the trees are adequately protected.

### Landscaping

- Access to the lawn area appears restricted to those who can use stairs. DDA compliance and consideration should be given to allow all people to gain access to the limited open space, via a ramp for example.
- Seating within the lawn area should be indicated within a seating / rest area.
- Tree sizes to be increased to minimum 75L, preferably 100L container sizes based on the size and type of development.
- All shrubs and groundcovers to be provided in minimum 200mm pots.
- A proposed *Elaeocarpus eumundi* to rear boundary has been located within a very narrow planting bed, next to an OSD tank. It is recommended this is relocated a minimum 2m away from the SW pipes and preferably within a wider landscape area (minimum 1m).
- It is recommended the bin areas to the front are sufficiently screened by landscape.

In addition to the below email, it is noted that Tree 12 *Jacaranda mimosifolia* located within 2 Jeffrey Ave will require pruning of some of the over-hanging branches. The extent of pruning proposed appears to be very excessive and is not supported (refer to the AIA Appendix I page 31). It is not understood why the extent of branches proposed to be removed has been discussed as the building has been setback and therefore the canopy should not be impacted by the works.

Some pruning is considered acceptable and no objection is raised for selective pruning to be carried out. A separate tree permit application with owners' consent is required to be provided to Council for consideration, prior to the determination of the development.

Should owner's consent not be provided for tree removal, the applicant is required to engage the services of an AQF Level 5 Consulting Arborist to provide guidance and the design amended to reflect an appropriate setback (Tree Protection Zone) to ensure the tree is adequately protected throughout the design and construction phases in accordance with AS4970-2009 *Protection of Trees on Development Sites*.

## **TRAFFIC ENGINEERING**

- The proposed development involves construction of a Senior's Housing development comprising of 6 × 1-bedroom and 6 × 2-bedroom self-contained dwellings with associated surface parking for 9 cars.
- The Traffic Impact Assessment (TIA) report that submitted with the development application was prepared by TEF Consulting dated 5 June 2022.
- Parking provision – based on Clause 108 of the Sepp (Housing) 2021, for a development application made by, or made by a person jointly with, a social housing provider, at least 1 parking space for every 5 dwellings is to be provided. Given that the proposal has been submitted by the NSW Land and Housing Corporation (LAHC) which is a social housing provider, the proposed development is to provide minimum 12 dwellings ÷ 5 = 3 (rounded up from 2.4) off-street parking spaces. It is noted that the proposed development will provide 9 on-site parking spaces which is considered compliance.
- Parking Dimensions – the dimensions of the parking spaces and aisle width comply with the requirements of AS 2890.1-2004.
- Vehicular access – A 3.0m driveway is provided from Brown Street into the carpark. The design of the driveway complies with the requirements of the Australian Standard AS 2890.1:2004. However, the driveway is considered as a one-way driveway. Measures is to be provided at the driveway entry point to ensure that the motorists entering the car park from Brown Street can give way to another motorist exiting the car park (thus preventing vehicles queuing backs to the frontage road). This may be achieved by the provision of a waiting bay at the driveway entry point.
- The TIA provided swept path plans for manoeuvring of vehicles into and out of the site in accordance with Appendix B of AS 2890.1 – 2004. The swept path plans demonstrates that on-site manoeuvring is satisfactory and all vehicles can enter and exit the site in a forward direction.
- Sight lines to pedestrians are provided in accordance with the minimum requirements specified in Figure 3.3 of AS 2890.1-2004 (a splay extending 2m from the driveway edge along the front boundary and 2.5m from the boundary along the driveway). The location of the splay has been illustrated in the TIA.

- The TIA estimates that 5 to 6 vehicular trips per hour will be generated as a result of the proposed development during the peak periods. The report, then, indicates that the estimated peak hour trips will have no discernible effect on the existing road network operation nor on the safety risks.

Based on the above points, Council's Traffic and Transport Services section does not have any objection to the proposed development.

### **ENGINEERING/STORMWATER**

Comments pending. Can be provided at a later date.

Council thank you for the opportunity to provide comment on this application and would also welcome the opportunity to comment on further stages associated with the detailed design development of the site.

If you require any further information regarding this matter, please do not hesitate to contact me.

Kind Regards

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