



REVIEW OF ENVIRONMENTAL FACTORS



Proposed Seniors Housing Development:

Demolition of existing dwellings and structures, removal of trees, and the construction of 8 independent living seniors housing units comprising 4 x 1 bedroom and 4 x 2 bedroom units, with associated landscaping and fencing, surface parking for 4 cars, and consolidation into a single lot.

at

15 - 17 Cecily Street, Belfield NSW 2191

October 2022

Department of Planning & Environment
Land & Housing Corporation
Postal address: Level 17, 4 Parramatta Square, Parramatta, NSW 2150
Locked Bag 5112, Parramatta NSW 2124
W www.dpie.nsw.gov.au

ABN 45 013 643 721

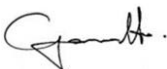

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The following register documents the preparation and issue of this Part 5 Review of Environmental Factors (REF), prepared by Barker Ryan Stewart for the New South Wales Land & Housing Corporation.

No	Date	Version	Change since last version
1	26.09.2022	v1	Prepared by BRS (AS)
2	11.10.2022	v2	NSW LAHC review (GH)

DOCUMENT SIGN-OFF

REF Prepared & Peer Reviewed by:	
Having prepared the Review of Environmental Factors:	
<ol style="list-style-type: none">1. I have declared any possible conflict of interests (real, potential or perceived) to the Acting Head of Policy and Innovation.2. I do not consider I have any personal interests that would affect my professional judgement.3. I will inform the Acting Head of Policy and Innovation as soon as I become aware of a possible conflict of interest.	
Name:	Ashlee Ryan
Designation:	Senior Town Planner – Barker Ryan Stewart
REF Reviewed by:	
I certify that I have reviewed this Review of Environmental Factors:	
Name:	Gavin Ho
Designation:	Planner, NSW Land & Housing Corporation
Signature:	
	Date: 11 October 2022
REF Reviewed by:	
I certify that I have reviewed this Review of Environmental Factors:	
Name:	Carolyn Howell
Designation:	Executive Planner, NSW Land & Housing Corporation
Signature:	
	Date: 21 October 2022
REF Endorsed by:	
I certify that I have reviewed and endorsed this Review of Environmental Factors:	
Name:	Ambrose Marquart
Designation:	A/Director, Portfolio Services, NSW Land & Housing Corporation

Signature: 	Date: 1.11.2022
REF Authorised for Issue by:	
Having endorsed the Review of Environmental Factors:	
<ol style="list-style-type: none">1. I have declared any possible conflict of interests (real, potential or perceived) to the Acting Head of Policy and Innovation.2. I do not consider I have any personal interests that would affect my professional judgement.3. I will inform the Acting Head of Policy and Innovation as soon as I become aware of a possible conflict of interest.	
Name: Peter Brackenreg	
Designation: Executive Director, Delivery South - NSW Land and Housing Corporation	
Signature: 	Date: 2/11/2022

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1. Executive Summary

The subject site is located at 15 – 17 Cecily Street, Belfield NSW 2191, and is legally described as Lots 17 & 18 in Deposited Plan 35173.

The proposed seniors housing development is described as follows:

Demolition of existing dwellings and structures, removal of trees, and the construction of 8 independent living seniors housing units comprising 4 x 1 bedroom and 4 x 2 bedroom units, with associated landscaping and fencing, surface parking for 4 cars, and consolidation into a single lot.

The proposed activity is located in a prescribed zone and seniors housing can therefore be carried out by the NSW Land and Housing Corporation (LAHC) without consent under the provisions of Part 5, Division 8 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) as it does not exceed 9.5 metres in height and will not result in more than 40 dwellings on the site.

Demolition has been considered as part of the proposed activity. Demolition is permitted with consent under the provisions of the applicable local environmental planning instrument and is therefore permitted without consent under the provisions of the Housing SEPP.

The removal of trees on the site is covered by the definition of consent under Section 6 of the Housing SEPP. It has therefore been incorporated in this review of environmental factors under Part 5 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation). Strathfield Council have also agreed to the removal of 1 street tree in the Cecily Street frontage.

The REF demonstrates the following:

- from an analysis of the potential environmental impacts associated with the proposed activity, it has been concluded that the preparation of an Environmental Impact Statement is not required;
- based on a review of the potential environmental impacts resulting from the proposed activity it has been determined that, subject to implementation of mitigation measures to be incorporated as identified requirements, the activity will not have any significant adverse impact on the environment;
- the proposed activity will not have any effect on matters of national significance and its approval under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* is not required;
- the design of the proposed activity has adequately taken into account design principles and better practices set out in the *Seniors Living Policy: Urban Design Guidelines for Infill Development* and taken into consideration *Good Design for Social Housing* and LAHC's *Dwelling Requirements*;
- the site planning and design of the proposed activity adequately address the applicable local environmental planning and development controls of Strathfield Council;
- a BASIX certificate and NatHERS certificate and stamped plans have been submitted for the proposed activity demonstrating compliance with the State Government's environmental sustainability targets; and
- there are no separate approvals, authorisations or notifications required in relation to the proposed activity prior to determination under Part 5 of the EP&A Act or under any other Acts.

Strathfield Council and occupiers of adjoining land were notified of the proposed activity under the provisions of Housing SEPP. A response was received from Council dated 16 September 2022. Comments on the response are provided in Section 6.1 of this REF. Five submissions were

received from occupiers of adjoining land. Comments on the submissions are provided in Section 6.2 of this REF.

The proposed activity, if carried out in accordance with the environmental mitigation measures outlined in the REF, will not result in any significant and long-term negative impacts on the environment and can proceed subject to the implementation of the identified requirements of determination in **Appendix C**.

2. Introduction

This Review of Environmental Factors (REF) under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) is for an activity involving the demolition of existing dwellings and structures, removal of trees, and the construction of an 8 unit seniors housing development comprising 4 x 1 bedroom and 4 x 2 bedroom independent living units, with associated landscaping and fencing, surface parking for 4 cars, and consolidation of the 2 lots into a single lot at No.15 – 17 Cecily Street, Belfield NSW 2191.

The activity* will be carried out by, or on behalf of, NSW Land and Housing Corporation (LAHC) and is 'development without consent' under the Housing SEPP.

This REF has been prepared by Barker Ryan Stewart on behalf of LAHC in satisfaction of the provisions of Part 5 of the Environmental Planning & Assessment Act 1979 (EP&A Act) and Part 8 of the Environmental Planning & Assessment Regulation (EP&A Regulations) 2021.

A Statement of Compliance accompanying this REF certifies that in accordance with the requirements of the EP&A Act, all matters affecting or likely to affect the environment by reason of the proposed activity have been taken into account to the fullest extent possible and the activity will not have a significant impact on the environment.

***Note:** *The proposed development is permitted without consent and is therefore subject to environmental impact assessment as an 'activity' under Part 5 of the Environmental Planning and Assessment Act 1979.*

2.1 Summary of Proposed Activity

The proposal is detailed in the following plans, drawings and specialist reports and supporting information:

Plans, Drawings & Supporting Document Details

The development is outlined in the following plans and drawings:

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
Architectural				
Cover Page	A00	D	10.06.2022	DKT Studio
Site Analysis	A01	D	10.06.2022	DKT Studio
Demolition Plan	A02	D	10.06.2022	DKT Studio
Site Plan	A03	D	10.06.2022	DKT Studio
Ground Floor Plan	A04	D	10.06.2022	DKT Studio
First Floor Plan	A05	D	10.06.2022	DKT Studio
Roof plan	A06	D	10.06.2022	DKT Studio
Elevations	A07	D	10.06.2022	DKT Studio
Elevation – Sections and Fence Details	A08	D	10.06.2022	DKT Studio
Ground Floor Circulation Space Plan	A09	D	10.06.2022	DKT Studio
First Floor Circulation Space Plan	A10	D	10.06.2022	DKT Studio
Cut and Fill Plan	A11	D	10.06.2022	DKT Studio
Shadow Diagrams	A12	D	10.06.2022	DKT Studio
Shadow Analysis	A13	D	10.06.2022	DKT Studio
View from the Sun	A14	D	10.06.2022	DKT Studio
Schedule of Finishes	A15	D	10.06.2022	DKT Studio
Landscape				
Landscape Plan	L01	F	20.06.2022	DKT Studio
Civil				
Notes and Legends	C01	5	23.11.2021	Greenview Consulting Pty Ltd
Ground Floor Drainage Plan	C02	7	34.11.2021	Greenview Consulting Pty Ltd
Site Stormwater Details Sheet 1	C03	5	23.11.2021	Greenview Consulting Pty Ltd
Road Frontage Plan	C04	7	23.11.2021	Greenview Consulting Pty Ltd
Survey				
Site Detail and Level Survey	Sheet 1 of 1	-	22.04.2021	S.J Surveying Services
Footpath Gradient	Sheet 1 of 1	-	22.04.2021	S.J Surveying Services
BASIX / NatHERS				
BASIX Certificate	1254522M_02		20.06.2022	Greenview Consulting Pty Ltd
NatHERS Certificate	0006723550		28.10.2021	Greenview Consulting Pty Ltd

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
Specialist Reports				
Arborist's Report	6886	1	29.10.2021	Redgum Horticultural
BCA Design Compliance Assessment	P210138	3	21.06.2022	BCA Vision
Geotechnical Investigation	21/1262	-	05.2021	STS Geotechnics
Traffic and Parking Impact Assessment	21252	-	04.07.2022	Varga Traffic Planning
Access Report	21265	C	07.07.2022	Vista Access Architects
Waste Management				
Waste Management Report	-	-	14.04.2022	DKT Studio

Design compliance and checklists

- Certificate of Building Design Compliance – DKT Studio dated 10/06/2022

Section 10.7 Planning Certificates

- Section 10.7(2) & (5) Planning Certificate, Certificate No 457, Lot 18 DP 35173, 15 Cecily Street, Belfield – Issued by Strathfield Council 20/04/2022
- Section 10.7(2) & (5) Planning Certificate, Certificate No 458, Lot 17 DP 35173, 17 Cecily Street, Belfield – Issued by Strathfield Council 20/04/2022

Titles and Deposited Plans

- Title Search, Folio: 17/35173, Search date 20/4/2022, First Schedule: New South Wales Land and Housing Corporation
- Title Search, Folio: 18/35173, Search date 20/4/2022, First Schedule: New South Wales Land and Housing Corporation, Second Schedule: Lease to St John of God Casa Venegas Limited of 15 Cecily Street, Belfield

AHIMS

- AHIMS Search Result, Lot: 17 DP: DP35173 – 50m search buffer, date 09/12/2020
- AHIMS Search Result, Lot: 18 DP: DP35173 – 50m search buffer, date 09/12/2020

Dial Before You Dig

- Dial Before You Dig search, dated 18/11/2020

2.2 Demolition

The proposed activity includes demolition of 2 single storey detached dwelling houses and associated structures, as identified in the Demolition Plan (refer to **Appendix E**).

2.3 Removal of Trees

3 trees are located within the site and the proposal includes the removal of 2 of those trees. 2 trees are located within the Cecily Street road reserve at the frontage of the site and 1 of these street

trees are proposed to be removed. The remaining street tree and trees within adjoining properties will be retained and protected.

The tree removal within the site boundaries is recommended primarily to accommodate the proposed development or the individual species are recommended for removal as they are not considered to be significant or worthy of retention (refer to submitted Arboricultural Impact Assessment in **Appendix F**).

It should be noted that tree permits will be required from Strathfield Council for the removal of street trees prior to construction. However, in principle agreement for the removal of street trees has been provided by Council (refer to correspondence in **Appendix B**).

More appropriate tree plantings, including trees capable of reaching mature heights of 8m to 12m, will be provided as part of the proposed landscaping plan to compensate for the loss of these trees (refer to submitted Landscape Plan in **Appendix E**).

2.4 Proposed Dwellings

Site, ground floor, first floor and elevation plans of the proposed development are contained within **Appendix E**. All units, have been designed as liveable units which are capable of being adapted to suit persons with a disability should the need arise in the future.

The proposed housing represents a contemporary, high quality design, which will be an improvement on the existing dwellings. The use of face brick and cement render for external walls and Colorbond metal roofing is consistent with the existing and developing character of the Belfield suburb. Six of the 8 proposed units will address the street (Units 1, 2 & 3 on the ground floor and Units 5, 6 & 7 on the first floor) with habitable rooms, living area windows or upper level balconies facing the street for passive surveillance. Each unit will be provided with its own enclosed private open space area. All these spaces are directly accessible from the living areas.

Minor cut and fill is proposed to provide a level building platform. Small retaining walls a maximum of 600mm high are proposed to assist with stability of the site as shown on the Site Plan (refer to **Appendix E**).

A variety of new landscape plantings are proposed to offset the proposed tree removal and enhance the appearance of the site. New plantings will consist of a mixture of trees, shrubs and groundcovers, which will enhance landscaped setbacks and contribute to the streetscape.

Four surface car parking spaces will be provided on the site, including 2 accessible spaces.

Stormwater will be collected via a series of stormwater pits and pipes on the site connected to an underground detention tank draining to the proposed inlet pit on the site frontage. A new street stormwater inlet pit at the front of 14 Cecily Street is also proposed, with pipes within Cecily Street connecting the development site to the existing pit at the frontage of 8 Cecily Street. Roof water will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground detention tank.

Colorbond fencing is proposed along the side and rear boundaries maximum 1.8m in height. Colorbond fencing is also provided to the private open space areas of each ground floor unit. A combination of concrete block and aluminium slatted fencing will be provided at the front of the development orientated to Cecily Street.

3. Existing Site & Locality

3.1 Existing Site and Immediately Adjoining Development

The site is located in the Strathfield local government area (LGA) and comprises 2 residential allotments. A location plan is provided at **Figure 1**.



Figure 1: Location Plan
(Source: SIX Maps)

The site is currently occupied by 2 single storey brick dwellings with tiled roofs (refer to photographs at **Figures 2 & 3**).



Figure 2: Development site – 15 Cecily Street



Figure 3: Development site – 17 Cecily Street

The property immediately to the north (13 Cecily Street) contains a single-storey brick with tile roof dwelling house with secondary dwelling at the rear (refer photograph at **Figure 4**). The property to the south (19 Cecily Street) contains a single-storey brick dwelling house with tile roof (refer to photograph at **Figure 5**).



Figure 4: Adjoining development – 13 Cecily Street



Figure 5: Adjoining development – 19 Cecily Street

3.2 Site Description

Copies of the Section 10.7(2) & (5) Planning Certificates (No.457 and 458) dated 20 April 2022 are provided in **Appendix A**.

The site has a total area of 1,348.1m², a frontage to Cecily Street of 34.479m, side boundaries of 40.21m (northern) and 40.22m (southern) and a rear boundary of 34.515m (refer to the submitted Detail and Level Survey Plan in **Appendix P**).

The site is relatively flat with a very minor fall from the rear boundary down toward Cecily Street of approximately 0.4m. An easement for stormwater drainage is not required.

The site is not within a flood planning area and is not subject to flood related development controls.

There are 3 trees located within the site; 2 trees located within the Cecily Street road reserve adjacent to the site and 1 tree is located within an adjoining property in proximity to the southern boundary of the site.

Water, sewer, electricity, gas and telephone facilities are available to the site (refer to the submitted Detail and Level Survey Plan for the location of available services at **Appendix P**). Water, electricity, telephone and gas services are located along the road alignment of Cecily Street, with Sewer located within an adjoining property parallel to the rear boundary of the site.

There are no encumbrances on title, section 10.7 certificates or indicated on the Detail and Level Survey Plan.

3.3 Neighbouring Development and Locality

The site is located within an established residential area which is characterised by older style single storey detached dwelling houses of brick construction with tiled roofs interspersed with more recent 2-storey dwelling houses, dual occupancy and residential flat building developments (refer to photographs at **Figures 6 & 7**).

There are numerous bus stops located within proximity of the site. Two bus stops are located on opposite sides of Punchbowl Road approximately 200m walking distance south of the site (refer to the Long Section Surveys provided at **Appendix P**). These stops are serviced by Punchbowl Bus Co Route 450, which connects Hurstville to Strathfield via Beverly Hills, Roselands, Lakemba and Belfield including train stations, major shopping centres and local centres in these areas.

The area, although residential in nature is also close to industrial / railway uses as well as some open space areas that run along Coxs Creek to the north of the site, including Begnell Field and Cooke Park. Approximately 700m to the north east of the site is the small town centre of Belfield along Burwood Road, which provides most day to day needs of residents. There are also a number of community-based land uses including child care centres, medical centres and churches.



Figure 6: More recent 2-storey unit development at 8 – 10 Cecily Street (north of the site)



Figure 7: More recent two storey development at 25 – 27 Cecily Street (east of the site)

4. Zoning and Permissibility

The site is zoned R2 Low Density Residential under *Strathfield Local Environmental Plan 2012* (SLEP2012). The proposed development is defined as 'seniors housing' under the provisions of SLEP2012 and is prohibited in the R2 zone.

Nevertheless, the provisions of the Housing SEPP prevail where there is an inconsistency with another environmental planning instrument. Seniors housing is permitted with consent under Section 81 of the Housing SEPP as the R2 zone is a prescribed zone under Section 79 of the SEPP. The subject land is not excluded from the provisions of the Housing SEPP set out under Section 80(1)(b). The site satisfies the site related requirements set out in Section 93 of the Housing SEPP. Therefore, seniors housing is permitted on the subject land with consent under the provisions of the SEPP pursuant to Section 79.

The relevant objectives of the R2 zone, as set out in SLEP2012 are:

- *To provide for the housing needs of the community within a low density residential environment.*
- *To ensure that development of housing does not adversely impact the heritage significance of adjacent heritage items and conservation areas.*

The proposed development provides seniors housing that meets the identified needs of the community and includes a mix of 1 and 2 bedroom units. The proposal is not located near heritage items or conservation areas and the development has also been sympathetically designed to fit within its context and complement the surrounding area. The proposal is therefore consistent with the relevant objectives of the R2 zone.

Section 108B of the Housing SEPP permits seniors housing development that may be carried out 'with consent' to be carried out by LAHC as 'development without consent' subject to the provisions set out under that clause. **Table 3** in subsection 5.1.5 of this REF demonstrates compliance with the relevant provisions of Section 108B of the SEPP.

5. Planning and Design Framework

5.1 State Legislation

5.1.1 Environmental Planning and Assessment Act 1979

Duty to consider environmental impact [Section 5.5]

Section 5.5(1) states that, for the purpose of attaining the objects of the EP&A Act relating to the protection and enhancement of the environment, a determining authority in its consideration of an activity shall, notwithstanding any other provisions of the Act or the provisions of any other Act or of any instrument made under the EP&A Act or any other Act, examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity.

Table 1 below demonstrates the effect of the proposed development activity on the matters listed for consideration in subsection 3 of Section 5.5.

Table 1: Matters for consideration under sub-section 3 of Section 5.5 of the EP&A Act	
Matter for consideration	Effect of Activity
<i>Sub-section 3</i> Without limiting subsection (1), a determining authority shall consider the effect of an activity on any wilderness area (within the meaning of the <i>Wilderness Act 1987</i>) in the locality in which the activity is intended to be carried on.	No effect, as the site and surrounding areas are not within a wilderness area (within the meaning of the <i>Wilderness Act 1987</i>).

5.1.2 Biodiversity Conservation Act 2016 (BC Act)

Part 7 of the BC Act sets out the test for determining whether a proposed development or activity is likely to significantly affected threatened species, ecological communities or their habitats. For the purposes of Part 5 of the EP&A Act, an activity is to be regarded as an activity likely to significantly affect the environment if it is likely to significantly affect threatened species.

Based on the criteria set out in Section 7.3 of the BC Act, it is considered that the proposed activity is unlikely to affect threatened species, ecological communities or their habitats and therefore no further assessment is necessary. This is because the land does not contain threatened species, endangered ecological communities or constitute habitat of threatened species or ecological communities. The proposed activity will neither be a key threatening process and the land is not part of or in the vicinity of any declared area of outstanding biodiversity value.

5.1.3 Other Acts

No other State and Commonwealth Acts are applicable to the proposed activity.

5.1.4 Environmental Planning and Assessment Regulation 2021

Factors that must be taken into account concerning the impact of an activity on the environment [Section 171]

For the purposes of Part 5 of the EP&A Act, the factors in **Table 2** below have been taken into account in considering the likely impact of the proposed activity on the environment. The table and comments made in this section of the REF are not mutually exclusive and are to be read in conjunction with the other sections of the REF dealing with the environmental impacts of the proposed development activity.

Table 2: Factors to be taken into account concerning the impact of an activity on the environment.	Relevant?	Impact		
	Yes/ NA	Temporary	Minor	Significant [Note 1]
Is the activity of a kind for which specific guidelines are in force? If so the factors to be taken into account when considering the likely impact of the activity on the environment are those referred to in the guidelines. [Note 1]	N/A			
Is the activity of any other kind for which general guidelines are in force? If so the factors to be taken into account when considering the likely impact of the activity on the environment are those referred to in those guidelines. [Note 2]	N/A			

If no guidelines are in force, have the following been taken into account and any likely impact considered:

(a) environmental impact on the community	Y	x	x	
(b) transformation of a locality;	Y		x	
(c) environmental impact on the ecosystems of the locality;	Y	x	X	
(d) reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality;	Y	x	x	
(e) effect on a locality, place or building having aesthetic, anthropological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations;	N/A			
(f) impact on the habitat of protected animals (within the meaning of Biodiversity Conservation Act 2016);	N/A			
(g) endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air;	N/A			
(h) long-term effects on the environment;	Y		x	
(i) degradation of the quality of the environment;	Y	x	x	
(j) risk to the safety of the environment;	N/A			
(k) reduction in the range of beneficial uses of the environment;	N/A			
(l) pollution of the environment;	Y	x	x	
(m) environmental problems associated with the disposal of waste;	Y		x	
(n) increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply;	Y		x	
(o) cumulative environmental effect with other existing or likely	Y		x	

Table 2: Factors to be taken into account concerning the impact of an activity on the environment.	Relevant?	Impact		
	Yes/ NA	Temporary	Minor	Significant [Note 1]
future activities.				
(p) impact on coastal processes and coastal hazards, including those under projected climate change conditions. [Note 3]	NA			
(q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	Y			
(r) other relevant environmental factors.	Y			

Note 1: A significant impact triggers the preparation of an Environmental Impact Statement.

Note 2: This means guidelines in force under Section 171, not guidelines such as the *Seniors Living Urban Design Guidelines*, that are in force under other legislation or instruments.

Note 3: The *NSW Coastal Planning Guideline: Adapting to Sea Level Rise* provides guidance on considering projected climate change conditions such as sea level rise.

The proposed seniors housing development is not expected to generate any significant or long-term impacts on the environment. The short term impacts, during construction, will be offset by positive social outcomes in the long term social benefits of providing affordable housing that meets the needs of the community. The applicable Local Strategic Planning Statement (LSPS) and Community Strategic Plan are considered below at Section 5.1.5 of this report.

Environmental Planning Instruments and Codes

5.1.5 Strategic Planning Framework

Strathfield 2040 Local Strategic Planning Statement

The Strathfield Local Strategic Planning Statement was endorsed by Strathfield Council in March 2020. It is a 20 year plan that identifies 18 Planning Priorities for the LGA, focused around infrastructure, collaboration, liveability, productivity and sustainability.

Notably, Priority 8 seeks to promote diverse housing options. The proposed development will be contributing 8 seniors living units to the affordable housing supply in the Strathfield LGA. It is diversifying the residential uses in Strathfield by introducing a seniors living housing options to accommodate the ageing population in the locality and is well serviced by existing public transport options.

The proposed development, of 8 seniors living units contributes to the objectives of the Strathfield Local Strategic Planning Statement, and will increase the provision of affordable and seniors living units.

Strathfield 2030 Community Strategic Plan

The Strathfield 2030 Community Strategic Plan was adopted by Council on 6 April 2021. It is a 10 year plan that outlines five broad inter-related themes that are derived from an extensive community engagement process, which identified priorities for the community's future. Under the five themes there are key goals and subsequent strategies for Council to facilitate in partnership with the community, government agencies and business. These five key strategic directions are supported by key goals that will guide the Strathfield area in the next 10 years. The themes are focused around; connectivity, community wellbeing, civic pride and place management, liveable

neighbourhoods and responsible leadership. The proposed development for 8 seniors living units is not in conflict with the Strathfield 2030 Community Strategic Plan and will provide new affordable housing within the LGA

5.1.6 State Environmental Planning Policy (Housing) 2021

Development without Consent

Section 108B of the Housing SEPP permits certain development that may be carried out 'with consent' to be carried out by LAHC as 'development without consent' subject to the provisions set out under that section. **Table 3** below demonstrates compliance with the relevant provisions of Part 5, Division 8 of the SEPP.

Table 3: Compliance with relevant provisions under sections Part 5, Division 8 of the SEPP for 'seniors housing development without consent' carried out by LAHC	
Provision	Compliance
108A – Development to which Division applies This Division applies to development for purposes of senior housing involving the erection of a building on land - <ul style="list-style-type: none"> (a) on which development for purposes of seniors housing is permitted with consent under another environmental planning instrument, or (b) in a prescribed zone 	Not applicable. The R2 zone is a prescribed zone under the SEPP. Part 5, Division 8 of the SEPP therefore applies.
108B – Seniors housing permitted without development consent (1) Development to which this Division applies may be carried out by or on behalf of the Land and Housing Corporation without development consent if - <ul style="list-style-type: none"> (a) the Land and Housing Corporation has considered the applicable development standards specified in sections 84(2)(c)(iii), 85, 88, 89 and 108, and (b) will not result in a building with a height of more than 9.5 m, and (c) the development will result in more than 40 dwellings on the site. (2) State Environmental Planning Policy (Transport and Infrastructure) 2021, sections 2.15 and 2.17 apply to the development and, in the application of the clauses— <ul style="list-style-type: none"> (a) a reference in section 2.15 to "this Chapter" is taken to be a reference to this section, and (b) a reference in the sections to a public authority is taken to be a reference to the relevant authority. 	Consideration of the development standards are provided in Tables 7-10 below. The maximum building height is 8m. The development is for 8 dwellings on the site. Sections 2.15 and 2.17 of State Environmental Planning Policy (Transport and Infrastructure) 2021 not applicable to the site or development. Noted. Noted.
108C – Requirements for carrying out seniors housing (1) Before carrying out development to which this Division applies, a relevant authority must – <ul style="list-style-type: none"> (a) request the council to nominate a person or persons who must, in the council's opinion, be notified of the 	Advice was sought from Strathfield Council regarding the scope of notification required for such development. On 29 September 2021, Strathfield Council requested that all

development, and	properties within a 500m radius of the development site, be notified of the development.
(b) give written notice of the intention to carry out the development to—	Following subsequent emails from Strathfield Council on 2 August 2022 and 9 August 2022, it was agreed that notification to a radius of properties within 100m is acceptable and is in line with the Strathfield Council Community Participation Plan.
(i) the council, and	
(ii) the person or persons nominated by the council, and	A letter notifying Strathfield Council of the proposed development activity was sent by LAHC on 10 August 2022. Letters notifying landowners and occupiers of adjoining land of the proposed development activity were sent by LAHC on the same date.
(iii) the occupiers of adjoining land, and	
(c) take into account the responses to the notice that are received within 21 days after the notice is given, and	Council responded to LAHC's notification by letter dated 16 September 2022. Comments on the response are provided in Section 6.1 of this REF. Five submissions were received from adjoining occupiers. Comments on the submissions are provided in Section 6.2 of this REF.
(d) take into account the relevant provisions of the Seniors Living Policy: Urban Design Guidelines for Infill Development, published by the Department in March 2004, and	Refer to checklist in Appendix D and subsection 6.1.5 of this REF. These conclude that the development complies with all relevant development standards relating to the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i> with the exception of the minor variations discussed in subsection 5.1.7 of this report. In these cases, suitable alternatives are proposed which are necessary due to site specific constraints.
(d1) if the relevant authority is the Aboriginal Housing Office—consider the relevant provisions of the Aboriginal Housing Design Guidelines, published by the Aboriginal Housing Office in January 2020, and	Not applicable.
(e) if the relevant authority is the Land and Housing Corporation—consider the relevant provisions of—	Refer to section 5.1.7 and 5.1.8 and the Architect's Statement and Certificate of Building Design Compliance in Appendix Q which indicate that the design and dwelling requirements have been considered
(i) Good Design for Social Housing, published by the Land and Housing Corporation in September 2020, and	
(ii) Land and Housing Corporation Dwelling Requirements, published by the Land and Housing Corporation in September 2020, and	
(f) consider the design principles set out in Division 6	Consideration of these principles is discussed in Table 4 .
(2) In this section, a reference to the council is a reference to the council for the land on which the development is proposed to be located.	Noted.
108D - Exempt development Development for purposes of landscaping and gardening is exempt development if it is carried out by or on behalf of the Land and Housing Corporation in relation to seniors housing.	Noted.
108E - Subdivision of seniors housing not permitted	No subdivision proposed.

Development consent must not be granted for subdivision of seniors housing.	
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5.1.7 Seniors Living Policy: Urban Design Guidelines for Infill Development

An assessment of the design of the activity against the *Seniors Living Policy: Urban Design Guidelines for Infill Development* is provided at **Appendix D**. The design has followed the Guidelines, except in relation to the following justifiable departures outlined in **Table 4**.

Table 4: Good Design for Social Housing – Relevant Goals & Principles	
Guideline Requirement	Response
2.23 Maintain, where possible, existing crossings and driveway locations on the street?	The proposed driveway has been appropriately positioned to maximise safety and accessibility to and from the site. The buildings, driveway and car parking areas have been designed in a coherent manner to ensure the visual impact of hardstand surfaces is reduced.
3.06 Set back upper levels behind the front building façade?	The upper level is not set back behind the building line at ground level as this is not typically a characteristic in the locality and for efficiency of layout and construction. A mixture of materials and finishes are provided for the front façade including use of articulation which makes a positive contribution to the streetscape and provides the variety needed to fit within the locality. The stepping of the first floor is not considered desirable or appropriate for the scale of the building.
3.29 Provide gates at the head of driveways to minimise visual 'pull' of the driveway	Gates at the head of driveways is not typical within the locality and would not complement the existing streetscape. The layout of the driveways, landscaping and buildings ensures the driveways are not the focal point of the development and reduces potential for visual pull.
4.03 Set upper storeys back behind the side or rear building line	Not required by DCP setbacks. The upper storeys follow the building line of the lower level that has a setback of 3m to the side. Similar, to the rear with a large setback of 8.8m. Upper floors have not been setback to simplify construction.
4.05 Incorporate second stories within the roof space and provide dormer windows?	Second storeys within roof spaces are not a characteristic in the locality. The proposed second storey complies with height and setback requirements and does not give rise to any adverse streetscape or amenity impacts.
4.16 Design dwellings around internal courtyards?	The front dwellings are facing the street with the rear dwellings designed towards common internal rear area. The design of the proposed development will allow for general surveillance of all common areas, particularly Units 1, 4, 5 and 8. Units 1, 2, 3, 5, 6 and 7 also have habitable rooms, living areas or balconies facing Cecily Street providing casual surveillance of the street.

5.1.8 Good Design for Social Housing

An assessment of the proposed development against the *Good Design for Social Housing* document, published in September 2020, indicates that the proposed development has adequately considered the goals and principles as outlined in **Table 5** below. Refer to Housing for Seniors Checklist in **Appendix D**.

Table 5: Good Design for Social Housing – Relevant Goals & Principles		
Goals	Principles	Comment - Discussion on how the design responds to the principles:
Wellbeing	<ul style="list-style-type: none"> Healthy environments Good for tenants Quality homes 	<ul style="list-style-type: none"> Safe access is provided from the car park to entries of the building. The units have been designed to ensure residents have privacy and feel safe.

Table 5: Good Design for Social Housing – Relevant Goals & Principles		
Goals	Principles	Comment - Discussion on how the design responds to the principles:
		<ul style="list-style-type: none"> Development compliant with BASIX requirements (Appendix H). The proposal includes high quality landscaping and outdoor areas to enhance the site amenity for residents and the streetscape.
Belonging	<ul style="list-style-type: none"> Mixed tenure Good shared and public spaces Contribute to local character 	<ul style="list-style-type: none"> Easily identified front entrances. Attractively designed landscaping along street frontage. The development is generally small in scale which minimises the resident density. The building design and landscaping integrates with the surrounding residential neighbourhood.
Value	<ul style="list-style-type: none"> Whole of lifecycle approach Sustainability and resilience Make every dollar count 	<ul style="list-style-type: none"> Low maintenance landscape species. Durable building materials. The orientation of each dwelling and private open space area has been designed to optimise natural light to these areas. An underground rainwater tank is provided for the development to assist with sustainability and on-site water retention. Development meets BASIX requirements for building sustainability. Collaboration and consultation with key stakeholders was also incorporated at critical design milestones.

5.1.9 Land and Housing Corporation Dwelling Requirements

An assessment of the proposed development against the *Land and Housing Corporation Dwelling Requirements* document has been undertaken and deemed to achieve compliance, refer to Certificate of Compliance from the Architect in **Appendix Q**. Further detail will be incorporated in the construction documentation.

5.1.10 Housing SEPP Design Principles

The Housing SEPP articulates a range of design principles that the LAHC must consider in determining whether or not to proceed with a proposed seniors housing activity. **Table 6** below demonstrates how the principles were considered in the design of the proposal.

Table 6: Response to Design Principles (Part 5, Division 8)	
Design Principle	Response
<p>Neighbourhood amenity and streetscape [section 99]</p> <p>Seniors housing should be designed to— (a) recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, and</p>	<p>The proposal incorporates a low scale two storey residential development with an FSR of 0.43:1 (calculated using the SEPP definition of FSR), which is generally compatible in form, scale and character with more contemporary and likely future residential development in the locality. The bulk of the development is broken up through the placement of the driveway, upper storey balconies, variety of materials and finishes as well as significant landscape plantings.</p> <p>The building setbacks do not detract from the streetscape character of the locality and are consistent with Council's DCP requirements and setbacks within the surrounding area.</p> <p>A suitable balance of cut and fill, consistent with Council's codes, is proposed to address the access requirements of the SEPP.</p> <p>In addition, it is considered that the proposed development</p>

	represents a reasonable balance between the optimal development potential of the site, the site constraints and the environmental considerations and also has the benefit of an additional 8 unit(s) for seniors housing.
(b) recognise the desirable elements of— (i) the location's current character, or (ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area, and	The proposal is generally compatible in form, scale and character with more contemporary residential development in the locality as illustrated in Figures 6 and 7 above.
(c) complement heritage conservation areas and heritage items in the area, and	The site is not located within a heritage conservation area nor are there any heritage items within proximity of the site.
(d) maintain reasonable neighbourhood amenity and appropriate residential character by— (i) providing building setbacks to reduce bulk and overshadowing, and (ii) using building form and siting that relates to the site's land form, and (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and	Building setbacks allow for substantial landscape plantings, are consistent with newer style developments in the area and generally comply with Strathfield DCP 2012 objectives and controls. A suitable balance of cut and fill is proposed to address the access requirements of the Seniors SEPP. The street front buildings will be two storey with the bulk of the development broken up through the use of a variety of materials and finishes, extensive landscaping, open space areas and appropriate setbacks. No buildings are located on the boundary.
(e) set back the front building on the site generally in line with the existing building line, and	The building line is consistent with the setbacks of dwelling houses in the locality, particularly more contemporary development. It is also noted that the front setback is provided in accordance with the DCP objectives.
(f) include plants reasonably similar to other plants in the street, and	Refer to the submitted Landscape Plan. The proposed high quality landscape design will enhance the appearance of the site and represents a positive outcome for the streetscape. Seven semi mature trees are also proposed with mature heights of 8 – 12m to soften visual impact. Native species have been chosen to complement existing vegetation within the surrounding locality including brush box and blue berry ash trees.
(g) retain, wherever reasonable, significant trees, and	3 trees (1 within the site, 1 on Council verge and 1 within adjoining property) are to be retained in accordance with the recommendations of the Arboricultural Impact Assessment report. All other trees (2 onsite and 1 in the Council verge) are to be removed and replaced by more suitable landscaping.
(h) prevent the construction of a building in a riparian zone.	The site is not located within or adjacent to a riparian zone.
Visual and acoustic privacy [section 100] Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and residents by— (a) using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and (b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from	The proposed development has been designed to maintain visual and acoustic privacy to adjoining properties and within the development. Design solutions include appropriate building setbacks and heights, dwelling layouts, placement and sizes of window openings and location and future mature height of landscaping, particularly along the southern boundary adjacent to proposed parking provisions. Boundary fencing to a height of maximum 1,800mm will assist with mitigation of visual and acoustic impacts associated with the internal hard stand car parking. Perimeter landscaping will also act as a visual and acoustic buffer between the car park and adjacent development. The generous rear building setback to the western boundary of the site will further limit any unacceptable impacts associated with vehicle movements within

<p>driveways, parking areas and paths.</p>	<p>the subject site.</p> <p>The proposed dwellings have been designed in accordance with the requirements of the <i>Building Code of Australia</i> for sound and impact transmission so that acceptable noise levels between dwellings and adjoining properties are achieved.</p>
<p>Solar access and design for climate [section 101]</p> <p>The design of seniors housing should—</p> <p>(a) for development involving the erection of a new building—provide residents of the building with adequate daylight in a way that does not adversely impact the amount of daylight in neighbouring buildings, and</p> <p>(b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation, solar heating and lighting by locating the windows of living and dining areas in a northerly direction.</p>	<p>The design and siting of the proposed development will provide adequate daylight access to its living areas and private open spaces and the living areas and private open spaces of adjoining properties. The northern orientation of proposed living and open space areas will maximise solar access. 100% of the proposed dwellings will receive a minimum of two hours sunlight between 9am and 3pm on June 21 to their living area and private open space.</p> <p>The windows on the northern aspect of the dwelling to the south (No 19 Cecily Street) will retain sunlight during the morning. Part of the private open space will be overshadowed in the morning although more than 50% of the private open space is provided with solar access from 9am to 3pm mid winter. The northern aspect of the dwelling will be overshadowed from 12pm to 3pm. The development will not generate any additional adverse solar impacts on neighbouring properties. The shadow impacts of the development are limited and No 19 Cecily Street is provided with an appropriate level of solar access to both the private open space and living room windows on the northern aspect. Refer to the shadow diagrams at Appendix E.</p> <p>Landscaping will also assist in microclimate management.</p>
<p>Stormwater [section 102]</p> <p>The design of seniors housing should aim to—</p> <p>(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and</p> <p>(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.</p>	<p>Impervious surfaces have been minimised in the design to reduce the potential impact from stormwater. Site stormwater will be drained as shown on the submitted stormwater drainage plans and incorporates on-site detention and a rainwater tank (refer to the submitted stormwater drainage plans at Appendix E).</p>
<p>Crime prevention [section 103]</p> <p>Seniors housing should—</p> <p>(a) be designed in accordance with environmental design principles relating to crime prevention, and</p> <p>(b) provide personal property security for residents and visitors, and</p> <p>(c) encourage crime prevention by—</p> <p>(i) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and</p> <p>(ii) providing shared entries, if required, that</p>	<p>Fencing will be constructed along the side and rear site boundaries, and along the edges of the ground floor private open space to each dwelling to provide an appropriate level of safety and security to proposed residents.</p> <p>The design of the proposed development will allow for general surveillance of all common areas, particularly Units 1, 4, 5 and 8. Units 1, 2 and 3 and 5, 6 and 7 also have habitable rooms, living areas or balconies facing Cecily Street providing casual surveillance of the street.</p> <p>Peep-holes will also be provided on the front doors of each dwelling to enable residents to view approaches to their dwelling without having to open the door.</p>

<p>serve a small number of dwellings and that are able to be locked, and</p> <p>(iii) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.</p>	
<p>Accessibility [section 104]</p> <p>Seniors housing should—</p> <p>(a) have obvious and safe pedestrian links from the site that provide access to transport services or local facilities, and</p> <p>(b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.</p>	<p>The proposed development is well located with safe pedestrian links within and adjacent to the site that provide access to transport services, local facilities and will provide an attractive and safe environment for pedestrians and motorists with convenient access to car parking areas for residents.</p> <p>Refer to the Access Report attached in Appendix G for confirmation.</p>
<p>Waste management [section 105]</p> <p>Seniors housing should include waste facilities that maximise recycling by the provision of appropriate facilities.</p>	<p>Waste and recycling facilities will be provided in accordance with Council's requirements. The proposed development provides shared waste and recycling collection facilities on the site.</p>

5.1.11 General Requirements and Development Standards Applying to Seniors Housing

The Housing SEPP is very specific in terms of the matters that LAHC must consider in determining whether or not to proceed with a seniors housing development that meets the thresholds for self approval under the SEPP. There are locational and detailed design requirements that also need to be considered. These are discussed below.

The proposed activity is located in an established urban area and there are no known natural environmental considerations affecting the subject land (including known significant environmental values, resources or hazards). The existing uses and approved uses of land in the vicinity of the proposed development are for residential purposes.

A site analysis was undertaken as part of the design process. The impact of the bulk, scale and built form is considered to be compatible with the existing uses, approved uses and the likely future character of the area.

There are services, facilities and infrastructure that will be available to meet the demands arising from the proposed activity

(i) General Development standards [Section 84, 85 and Schedule 4]

The SEPP contains general development standards relating to minimum site size, site frontage and building height (Section 84), which must be taken into consideration for all developments, and development standards specifically for independent living units (Section 85 & Schedule 4), which must also be considered. Consideration of Section 84 of the SEPP is demonstrated at **Table 7** below:

Table 7: Minimum site size, site frontage and building height standards [section 84]

Development Standard	Required	Comment
Site size (sec 84(2)(a))	At least 1,000m ²	1,348.1m ² , although not applicable to LAHC (cl 84(4)(a))
Site frontage (sec 84(2)(b))	At least 20m	34.515m, although not applicable to LAHC (cl 84(4)(a))
Height in zones where residential flat buildings are not permitted: - height (sec 84(2)(c)) - buildings adjacent to rear site boundary (sec 84(2)(c))	9.5m or less 2 storeys	Max 8m Max 2 storeys in height

Consideration of the development standards for accessibility set out in Section 85 and Schedule 4 is demonstrated in **Table 8** below (Note: where referenced 'subject to identified requirement' in the table, refer to **Appendix C**).

It should be noted that pursuant to Section 85(2), LAHC is exempt from the siting standards for wheelchair access and access to common area / facilities set out below in relation to a unit or part of a unit that is located above the ground floor in a multi-storey building.

Table 8: Accessibility and useability standards [Schedule 4]

Development Standard	Required	Comment
Siting Standards:		
Wheelchair access	N/A	N/A
'Non-sloping' sites i.e. with gradients entirely <1:10	100% of ground floor dwellings to have wheelchair access by a continuous accessible path of travel as per AS 1428.1 to an adjoining public road	100% of ground floor units have accessible paths of travel in accordance with AS1428.1 to the front boundary.
'Sloping' sites i.e. with gradients entirely or partially >1:10	% of ground floor dwellings, equal to % of site with gradient <1:10 or minimum 50% (whichever is greater), to have wheelchair access by a continuous accessible path of travel as per AS 1428.1 to driveway or public road that is accessible to all residents	Not applicable, as the site does not have a gradient of more than 1 in 10.
Common areas	All common areas and facilities to have wheelchair accessibility as per AS 1428.1	All common areas have accessible paths of travel in accordance with AS1428.1.
Security:		
Pathway lighting	Pathway lighting to be designed and located to avoid glare for pedestrians and adjacent dwellings and to provide min 20 lux at ground level	All lighting will be designed as per requirements at tender stage (subject to Identified Requirements).
Letterboxes:	To be lockable, located in central location adjacent to street entry or in one or more central locations on a hard standing area and have wheelchair access and circulation by a continuous path of travel (as per AS 1428.1)	Letterboxes have been provided in one location adjacent to the Cecily Street entry on hardstand areas and have wheelchair access and circulation by a

Table 8: Accessibility and useability standards [Schedule 4]

Development Standard	Required	Comment
		continuous path of travel in accordance with AS1428.1.
Private car accommodation:		
Disabled car parking	Car parking spaces must comply with the requirements for parking for persons with a disability set out in AS 2890 and at least 5% of the total number of car parking spaces (or at least 1 space if there are fewer than 20 spaces) must be designed to enable the width of the spaces to be increased to 3.8m	Two accessible car parking spaces are provided, which meet the requirements of AS2890.
Garages	Must have power-operated door or there must be a power point and an area for motor or control rods to enable a power-operated door to be installed at a later date	Not applicable, as the proposal does not incorporate garages.
Accessible entry (every entry, whether front entry or not):	Must comply with clauses 4.3.1 and 4.3.2 of AS 4299	All entries comply with external doorways to be designed to comply with AS1428.1 where flush access is not provided at tender stage (subject to Identified Requirements).
Garbage:	To be provided in accessible location	One bin storage area has been provided at the rear of the parking area. These areas are compliant with AS1428.

Consideration of the specific development standards for useability set out in Schedule 4 of the SEPP, i.e. the standards for internal design and fittings, is outlined in **Table 9** below. It should be noted that pursuant to section 85(2), LAHC is exempt from those development standards in relation to a unit or part of a unit that is located above the ground floor in a multi-storey building, these being Sections 2, 7 to 13 & 15 to 20, including the requirement to provide lift access for units above the ground level in multi-storey buildings. The following standards therefore only apply to ground floor units.

Table 9: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Comment
Interior: general	<p>Internal doorways must have a minimum clear opening that complies with AS 1428.1</p> <p>Internal corridors must have a minimum unobstructed width of 1,000 millimetres</p> <p>Circulation space at approaches to internal doorways must comply with AS 1428.1</p>	<p>Internal doorways comply with AS 1428.1</p> <p>Internal corridors meet the minimum 1000mm width.</p> <p>Circulation spaces will be required to comply (refer to Identified Requirement no.73)</p>
Bedroom:	<p>At least one bedroom within each dwelling must have:</p> <p>(a) an area sufficient to accommodate a wardrobe and a bed sized as follows:</p>	Complies.

Table 9: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Comment
	<ul style="list-style-type: none"> (i) in the case of a dwelling in a hostel-a single - size bed, (ii) in the case of a self -contained dwelling - a queen-size bed, and (b) a clear area for the bed of at least: <ul style="list-style-type: none"> (i) 1,200 millimetres wide at the foot of the bed, and (ii) 1,000 millimetres wide beside the bed between it and the wall, wardrobe or any other obstruction, and (c) 2 double general power outlets on the wall where the head of the bed is likely to be, and (d) at least one general power outlet on the wall opposite the wall where the head of the bed is likely to be, and (e) a telephone outlet next to the bed on the side closest to the door and a general power outlet beside the telephone outlet, and (f) wiring to allow a potential illumination level of at least 300 lux 	<p>Not applicable.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p>
Bathroom:	<p>At least one bathroom within a dwelling must be on the ground (or main) floor and have the following facilities arranged within an area that provides for circulation space for sanitary facilities in accordance with AS 1428.1:</p> <ul style="list-style-type: none"> (a) a slip-resistant floor surface, (b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1, (c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future: <ul style="list-style-type: none"> (i) a grab rail, (ii) portable shower head, (iii) folding seat, (d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it, (e) a double general power outlet beside the mirror <p>The requirement under item (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility</p>	<p>Bathrooms within ground floor dwellings comply with circulation requirements as per AS 1428.1.</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p>
Toilet:	A dwelling must have at least one toilet on the ground (or main) floor and be a visitable toilet that complies with the requirements for sanitary facilities	All ground floor dwellings will be provided with a visitable toilet within the combined bathroom /

Table 9: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Comment
	of AS 4299	laundry that complies with AS 4299.
Surface finishes:	Balconies and external paved areas must have slip-resistant surfaces	Will be required to comply (refer to Identified Requirement no.73)
Door hardware:	Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299	Will be required to comply (refer to Identified Requirement no.73)
Ancillary items:	Switches and power points must be provided in accordance with AS 4299	Will be required to comply (refer to Identified Requirement no.73)
Living room and dining room:	<p>A living room in a self-contained dwelling must have:</p> <p>(a) a circulation space in accordance with clause 4.7.1 of AS 4299, and</p> <p>(b) a telephone adjacent to a general power outlet.</p> <p>A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux</p>	<p>All living rooms comply with circulation requirements.</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p>
Kitchen:	<p>A kitchen in a self-contained dwelling must have:</p> <p>(a) a circulation space in accordance with clause 4.5.2 of AS 4299, and</p> <p>(b) a width at door approaches complying with clause 7 of this Schedule, and</p> <p>(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299:</p> <p>(i) benches that include at least one work surface at least 800 millimetres in length that comply with clause 4.5.5 (a),</p> <p>(ii) a tap set (see clause 4.5.6),</p> <p>(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,</p> <p>(iv) an oven (see clause 4.5.8), and</p> <p>(d) "D" pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and</p> <p>(e) general power outlets:</p> <p>(i) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and</p> <p>(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed</p>	<p>All units comply with kitchen circulation requirements.</p> <p>Not applicable, as kitchens are open plan.</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p>

Table 9: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Comment
Access to kitchen, main bedroom, bathroom and toilet:	In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level	Not applicable, as dwellings are not multi-storey.
Laundry:	<p>A self-contained dwelling must have a laundry that has:</p> <p>(a) width at door approaches that complies with cl 7 of this Schedule, and</p> <p>(b) provision for the installation of an automatic washing machine and a clothes dryer, and</p> <p>(c) a clear space in front of appliances of at least 1,300 millimetres, and</p> <p>(d) a slip-resistant floor surface, and</p> <p>(e) an accessible path of travel to any clothes line provided in relation to the dwelling</p>	<p>Laundries are located within bathrooms and comply with AS1428.</p> <p>Complies.</p> <p>Complies.</p> <p>Will be required to comply (refer to Identified Requirement no.73)</p> <p>Complies.</p>
Storage for linen:	A self-contained dwelling must be provided with a linen storage in accordance with Clause 4.11.5 of AS 4299	Linen storage (min 600mm wide) will be available in all of the proposed dwellings.
Garbage	A garbage storage area must be provided in an accessible location.	Complies.

(ii) Site related requirements

The proposed development complies with Section 93 of the SEPP which relates to the accessibility of the site to services and facilities such as shops and other retail/commercial services, community services recreation facilities and the practice of a general medical practitioner.

The site is within 400m walking distance of a bus stop that is suitably serviced to provide access to facilities and services. The bus stops are located approximately 200m from the site within Punchbowl Road that have accessible gradients of path of travel (see submitted Footpath Gradient Plan included at **Appendix P**). *Punchbowl Bus Co* operates a regular bus service from this stop (Route 450) during weekdays and on weekends that would take residents to and from the necessary services and facilities in the Hurstville, Roselands, and Strathfield centres.

An access consultant report indicates that the overall gradient of the path of travel for a person in a wheelchair is adequate. One section of the path (kerb ramp) is steeper than 1:8 which will need minor adjustment. The Footpath Gradient Plan including the proposed regrade to the kerb ramp is provided in **Appendix R**. The access report confirms that the existing and proposed grades of the pathway are within the range as required and details are to be verified during tender documentation. .

Therefore, given the above Section 93 of the SEPP is satisfied.

(iii) Non-discretionary Development Standards

The following **table** outlines the standards that for self-contained dwellings as set out in Section 108 of the SEPP, that if complied with, a consent authority cannot require compliance with more onerous standards.

Table 10: Standards that cannot be used for refusal for self-contained dwellings		
Development Standard	Required	Comment
Building Height:	9.5m or less	Maximum height 8m
Density and Scale:	Floor Space Ratio 0.5:1 or less	0.43:1
Landscaped Area:	Minimum 35m ² per dwelling (8 x 35m ² = 280m ²)	349m ²
Deep Soil Zone:	Minimum 15% of area of site (15% x 1,348.1m ² = 202m ²)	294m ² or 21.8%
	Minimum 65% (131m ²) to be preferably located at rear of site	151.65m ² provided at rear of site
	Minimum dimension 3m	Minimum dimension 3m
Solar Access:	Seventy percent (70%) of living areas & main private open space to receive minimum 2 hrs direct solar access between 9 am and 3 pm at mid-winter	100% of living areas and private open space (8 units) achieve 2 hours of direct solar access to private open space and living areas between 9am and 3pm mid-winter
Private Open Space:	Ground level: Minimum 15m ² per dwelling	Minimum 34m ²
	One area minimum 3m x 3m, accessible from living area	Minimum 3m x 3m
	Upper level/s: 1 bedroom: Minimum 6m ² Minimum dimensions 2m 2 or more bedrooms: Minimum 10m ² Minimum dimensions 2m	 Minimum 8m ² Minimum 2m Minimum 10m ² Minimum 2m
Car parking:	Minimum 1 car parking space for each 5 dwellings (LAHC concession) – 2 car parking spaces required	4 car parking spaces for 8 dwellings, including 2 accessible parking spaces.

5.1.12 5.1.11 Other State Environmental Planning Policies

Table 11 below outlines applicability of, and compliance with, other State and Environmental Planning Policies (SEPPs).

Table 11: Compliance with other applicable State and Environmental Planning Policies

State Environmental Planning Policy	Applicability
SEPP (Building Sustainability Index: BASIX) 2004	A BASIX Certificate has been obtained for the development proposal, as required under the SEPP (refer to Appendix H).
SEPP (Transport and Infrastructure) 2021	The site is not located in close proximity to a State Classified Road nor is it defined as traffic generating development.
SEPP (Biodiversity and Conservation) 2021	Clause 2.6(1) of this SEPP requires a permit from Council for clearing of vegetation required under the policy. Notwithstanding, Clause 6 of Housing SEPP specifies that development permitted without consent may be carried out without another consent or a licence, permission, approval or authorisation otherwise required under another environmental planning instrument. This means the proposed removal of trees within the site can be included within the REF scope and does not require a permit from Council. Tree removal is proposed within Cecily Street and a tree permit will be required to be issued by Strathfield Council for removal of the street tree.
SEPP (Resilience and Hazards) 2021	Section 4.6 of this SEPP requires the consent authority to consider whether land is contaminated prior to granting development consent. The site is located within a developed residential area of Belfield. The s10.7 Planning Certificates have not identified the site as potentially contaminated (refer to Appendix A). A standard recommended identified requirement requires implementation of management measures in the event of contamination during construction works.

5.2 Local Planning Controls

5.2.1 Strathfield Local Environmental Plan 2012 (SLEP 2012)

Compliance with the relevant provisions / development standards set out in the SLEP 2012 is demonstrated in **Table 12** below.

Table 12: Strathfield Local Environmental Plan 2012 Relevant Provisions / Development Standards for Seniors Housing			
Clause	Provision / Development Standard	Required	Provided
4.3	Height of Buildings	The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map (9.5 metres).	Maximum building height (measured in accordance with the LEP definition) is 8 metres.
4.4	Floor Space Ratio	The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map. The site is not mapped as containing a maximum floor space ratio on the Floor Space Ratio Map.	Proposed FSR is 0.43:1 (calculated in accordance with the LEP definition). The proposed FSR is compliant under the Seniors SEPP (as addressed above) and does not result in any substantive adverse impacts on adjoining properties or the streetscape.

5.2.2 Strathfield Development Control Plan 2005

Strathfield Development Control Plan 2005 (SDCP 2005) does not contain specific development controls for seniors housing. As such, the building setbacks for multi-unit housing have been used for comparative purposes to demonstrate the suitability of the site for the proposed scale of the development as shown in **Table 13** below.

The general controls for all development set out in SDCP 2005 have generally been addressed in the various sections of this REF that address compliance with the provisions of the Housing SEPP.

Table 13: Strathfield Development Control Plan 2005 Compliance with setback controls for multi-unit housing		
Multi-unit housing		
Clause	Requirement	Proposed
2.2 Density, Bulk and Scale Building Envelope	<p><u>Front setbacks</u></p> <p>Subject to exceptions set out below, a minimum setback to the street alignment of 9m is required for all new buildings.</p> <p>Notwithstanding the above requirement, developments may be setback less than 9m where the predominant setback in the street block is less than 9m or the setback would not conflict with the existing streetscape.</p>	<p>Minimum 8.8m setback to Cecily Street.</p> <p>The site is located within a low density residential area where dwellings are setback significantly less than 9.0m from the street (refer to adjoining development at No. 13 and 19 Cecily Street). It is therefore appropriate to apply the exception provided within the DCP controls for this development. The proposed front setbacks complement the existing setbacks along Cecily Street. The setbacks are considered appropriate as they protect existing amenity for neighbouring residents and provide a high quality residential development for future residents of the seniors housing units. The proposed front setbacks are considered compliant with the exception provided within the DCP controls and consistent with the density, bulk and scale objectives.</p>
	<p><u>Side and rear setbacks</u></p> <p>Buildings shall be sited within a building envelope determined by a plane projected at an angle of 45 degrees over a site from a height of 3.5m above natural ground level along the side and rear boundaries of the land.</p>	<p>Rear setback of 11.4m for ground floor and upper level, exceeding DCP requirement.</p> <p>Minimum side setback of 3.0m, and compliant with DCP requirement.</p>

6. Notification, Consultation and Consideration of Responses

Copies of the notification letters sent to the local council and to the adjoining occupiers are provided in **Appendix B**, together with copies of all responses received and a record of any verbal responses.

6.1 Council Notification

In accordance with Section 108C of the Housing SEPP, Strathfield Council was notified of the development by letter dated 10 August 2022 (refer to **Appendix B**). The notification response period formally closed on 4 September 2022 and Council responded to the notification by letter dated 16 September 2022, with primary matters raised outlined in **Table 14** below. A response is provided in relation to the comments and matters raised in Council's letter and where appropriate, these matters have been addressed in the identified requirements in **Appendix C**.

Table 14: Issues raised in Council submission	
Issues raised	Response
<p><i>Tree removal – Council's Arborist has reviewed the submitted Arborist report and raised no concerns in relation to the proposed street tree removal. We encourage LAHC to refer to Council's tree planting web page for a list of trees preferred by Council if LAHC are proposing a replacement street tree.</i></p> <p>https://www.strathfield.nsw.gov.au/live/trees/selecting-and-planting-trees/</p> <p><i>Included as an attachment to this letter are a number of standard Strathfield Council conditions of consent that LAHC may want to consider in preparing the Identified Requirements. Relevant conditions relating to tree removal, compliance with the submitted arborist report and tree pruning are among these conditions.</i></p>	<p>Noted. The proposed replacement street tree is a <i>Lophostemon conferta</i> (Brush box), which is a recommended tree species as per Strathfield Councils Recommended Tree List.</p> <p>Refer to Identified Requirements no.18, 19, 20, 44, 79 & 80.</p>
<p><i>It is noted that the proposed vehicle crossing is consistent with Council's driveway crossing width standards, being 3m. The attachment to this letter includes a number of conditions relating to driveway crossovers for LAHC'S reference.</i></p>	<p>Noted. Refer to Identified Requirements no.10, 11 and 12.</p>
<p><i>It is noted that the southern setback is approximately 3m to the building façade line, which is considered adequate. However, the courtyard areas for Units 3, 4, 7 and 8 are close to the side boundary and typically Council encourages such areas to be at the rear. Noting the site constraints, Council encourages LAHC to introduce landscaping embellishments that will create a visual buffer for the southern neighbor to these spaces. The imagined outcome is similar to the outcome proposed for the eastern boundary at 97-99 Punchbowl Road, with feature trees and dense planting.</i></p>	<p>Landscaping for the development has been designed to provide dense shrub plantings between the courtyard areas and the southern side boundary. The species selected within this area are considered to be appropriate for the landscape area available.</p> <p>Furthermore, to maximise privacy and reduce the visual bulk of the proposed development to the southern adjoining property, the planter bed with <i>Lushious Frangipani</i> (Hyl) that runs along the southern boundary adjacent to the pedestrian pathways associated with Unit 3 and Unit 4 must be extended in continuous length. This will require the re-alignment of the retaining wall to run entirely parallel to the side boundary and the re-location of the Unit 3 and Unit 4 clothes line to be setback a minimum of 1m from the side boundary. Refer to Identified Requirement no.81.</p>

Table 14: Issues raised in Council submission

Issues raised	Response

6.2 Notification of Occupiers of Adjoining Land and Other Persons

Under Section 108C(1)(a) of the Housing SEPP, the Council for the area was requested to nominate any other persons who should, in the Council's opinion, be notified of the development.

Advice was sought from Strathfield Council regarding the scope of notification required for such development. On 29 September 2021, Strathfield Council requested that all properties within a 500m radius of the development site, be notified of the development.

Following subsequent emails from Strathfield Council on 2 August 2022 and 9 August 2022, it was agreed that notification to a radius of properties within 100m is acceptable and is in line with the Strathfield Council Community Participation Plan.

Under section 108C(1)(b) of Housing SEPP, occupiers of adjoining land within 100m of the development site (as required by Strathfield Council Community Participation Plan) and within the LGA, were notified of the proposed development activity, by letter dated 10 August 2022. Copies of the notification letters are provided at **Appendix B**.

The notification response period formally closed on 4 September 2022. 5 neighbour submissions were received during this period and are discussed in **Table 15**.

Table 15: Issues raised by adjoining owners / neighbours

Issues raised	LAHC Response
Submission 1: Development Plans for 15-17 Cecily Street not enclosed in the envelope received.	A copy of the development plans for 15-17 Cecily Street, Belfield provided to the respondent by email on 15 August 2022. No additional response required.
Submission 2: Support of the proposals and design. Expression of interest in quoting these projects as the appointed contractor.	Response provided to submitter identifying that the project is in statutory notification and the tendering phase for builders is not yet reached. It was advised that should this proposal be approved, as a local supplier it would be encouraged to participate in the tendering options.
Submission 3: Concerns of car parking adequacy for residents and visitors. Previous unruly tenants and concerns for this reoccurring.	The proposal meets the requirements for car parking in the Housing SEPP. An independent traffic impact assessment has been undertaken and is provided at Appendix M . This assessment has concluded that the proposal is unlikely to have significant parking and traffic impacts for the street and immediate locality. The submitter was advised of the policy that the Department of Communities and Justice (DCJ) has in place for dealing with disruptive tenants and that DCJ has a dedicated 24 hour hotline, 1800 422 322, where local residents can report any tenancy related matters.
Submission 4: Plans for the development at 15-17 Cecily Street not included within the distribution package. Seniors Housing Development at 8-10 Cecily Street should have been included in the letter to the residents dated 10 August 2022.	The submitter was provided copies of the plans and specialist consultant reports via email. The proposal meets the requirements for car parking in the Housing SEPP. An independent traffic impact assessment has been undertaken and is provided at Appendix M . This assessment has concluded that the

Table 15: Issues raised by adjoining owners / neighbours

Issues raised	LAHC Response
<p>Car parking spaces for development at 8-10 Cecily Street closed off.</p> <p>The Parking Assessment Report makes no reference to the existing development in the area. Questioning validity of the report.</p> <p>Supportive of the building design.</p> <p>Concerns for local residents being relocated.</p>	<p>proposal is unlikely to have significant parking and traffic for the street and immediate locality. Section 3 of the Traffic report outlined the existing traffic conditions and road hierarchies.</p> <p>The NSW Department of Community and Justice and NSW LAHC will be responsible for managing the current tenant relocations.</p>
<p>Submission 5: Plans for the development at 15-17 Cecily Street not included within the distribution package.</p> <p>Parking concerns on Cecily Street and existing development at 8-10 Cecily Street.</p>	<p>The submitter was provided copies of the plans and specialist consultant reports via email.</p> <p>The proposal meets the requirements for car parking in the Housing SEPP. An independent traffic impact assessment has been undertaken and is provided at Appendix M. This assessment has concluded that the proposal is unlikely to have significant parking and traffic for the street and immediate locality. Section 4 of the Traffic report outlined the existing and proposed parking conditions.</p>

6.3 Notification of Specified Public Authorities

The development is “seniors housing” under Section 108A of the Housing SEPP. As required by Section 108B(2) of the Housing SEPP, consideration has been given to the need to notify the “specified public authorities” identified in State Environmental Planning Policy (Transport and Infrastructure) 2021, Sections 2.15 and 2.17. The development is not located in an area that triggers the requirement to notify public authorities other than Council.

7. Review of Environmental Factors

Environmental factors associated with the proposed activity in terms of location, character, bulk and density, privacy, solar access and overshadowing have been considered in accordance with the provisions of the Housing SEPP and discussed in Section 5.1.9 of this REF. A review of other environmental factors associated with the proposed activity, and the measures required to mitigate any adverse impacts to the environment, are provided below.

7.1 Neighbourhood Character

The site is located within an established residential area which is characterised by older style single storey detached dwelling houses of brick construction with tiled roofs interspersed with more recent 2-storey dwelling houses, dual occupancy and residential flat building developments (refer to photographs at **Figures 6 & 7**). The area, although residential in nature, is also close to industrial / railway uses as well as some open space areas that run along Coxs Creek to the north of the site, including Begnell Field and Cooke Park. Approximately 700m to the north east of the site is the small town centre of Belfield along Burwood Road, which provides most day to day needs of residents. There are also a number of community-based land uses including child care centres, medical centres and churches.

The proposed 2-storey seniors housing development comprised of 8 units is consistent with the bulk and scale of the existing and desired future character of the locality. The siting, layout and landscape setting of the proposed development aligns with that of emerging development in the locality.

No mitigation measures are required, as the design of the proposed development is sympathetic to the neighbourhood character, providing setbacks to neighbouring development that are consistent with surrounding development. Suitable design treatments, including fencing, landscaping and a considered planting mix ensure the proposal will generate benefits to neighbourhood character.

Mitigation measures

No mitigation measures are required.

7.2 Bulk and Density

The proposed development is consistent with the bulk and scale of surrounding development in the locality. The design has incorporated appropriate setbacks, articulation, external finishes, materials and landscaping to reduce the visual bulk of the development.

The proposal is 8.5m in height which is below the maximum permitted height of building (9.5m) and has a FSR of 0.434:1 (585.2m²), which is below the maximum permitted FSR (0:5.1), development standards under the Housing SEPP.

The proposal will suitably increase housing density which is consistent with State and regional strategies and the development controls applying to the site, without contributing to any significant adverse impacts in terms of bulk, scale and density.

Mitigation measures

No mitigation measures are required.

7.3 Streetscape

The architectural style of the proposed development activity is compatible with the built form and character of the locality. The articulation, choice of materials, setback and landscaped design at the front setback area contributes to the proposal having a positive contribution to the streetscape.

Mitigation measures

No mitigation measures are required.

7.4 Visual Impact

The proposed development will generate some short-term visual impact on the surrounding area during construction, with a long-term positive visual impact associated with the establishment of new dwellings in an existing urban residential context.

The proposed development will make a positive contribution to the residential streetscape through construction of new contemporary dwellings that respond to the site context and neighbourhood character. Articulation, diverse mix of materials and colour palette will assist with the overall aesthetic of the site as well as the improved landscaped design.

Mitigation measures

No mitigation measures are required.

7.5 Privacy

A high level of internal and external privacy is maintained by the proposed development activity through a range of measures including careful and considered site landscaping, fencing, adequate site setbacks and strategic placement of windows so as to avoid direct overlooking of neighbours.

Mitigation measures

No mitigation measures are required.

7.6 Solar Access

The design and siting of the proposed development will provide adequate daylight access to both of the proposed dwellings living areas, private open spaces and the private open space areas of neighbouring properties in accordance with the *Seniors Living Policy: Urban Design Guidelines for Infill Development*.

Shadow diagrams also confirm the proposed development will facilitate sunlight to living areas and private open space of the dwellings on adjoining sites.

Proposed living and open space areas have been carefully sited to maximise solar access and the proposal is consistent with the Housing SEPP requirements.

Mitigation measures

No mitigation measures are required.

7.7 Overshadowing

The shadow diagrams confirm the development has been designed to minimise overshadowing of surrounding development. Shadow diagrams in **Appendix E** confirm the proposed development will not generate unacceptable shadow impacts to living areas and private open space of dwellings on adjoining sites, and that solar access to the neighbouring site's living and POS areas are largely unaffected by the proposal.

Mitigation measures

No mitigation measures are required.

7.8 Traffic & Parking

Four surface car parking spaces for residents, including 2 accessible spaces, will be available on site to serve the proposed development. The level of provision of on-site car parking satisfies the parking requirements set out in the Housing SEPP for developments carried out by LAHC. Unrestricted street parking is available on Cecily Street to accommodate any overflow parking demand generated by the proposed development.

Proposed on-site parking provision (4 spaces) exceeds the Housing SEPP parking rate requirements by 2 spaces.

The Traffic and Parking Assessment Report (**Appendix M**) indicates that the development will have a projected nett decrease of 2 vehicles per hour in the AM peak hour and a nett increase in 1 vehicle per hour in the PM peak hour. The projected nett change in traffic activity as a consequence of the development proposal is negligible and will not have any unacceptable implications in terms of road network capacity.

The Traffic and Parking Assessment Report examined the adequacy of the proposed internal driveway and parking arrangement. The assessment confirmed that the design is suitable based on an assessment of the project vehicle movements. The proposed development is expected to generate 3.2 vehicles per hour during peak periods, which is significantly less than the 30 vehicles per hour threshold for two-lane roadways. A passing bay on the driveway is therefore not required and the proposed access arrangement is considered acceptable.

Mitigation measures

No mitigation measures are required.

7.9 Flora and Fauna

An Arboricultural Impact Assessment has been prepared for the site by Redgum Horticultural (**Appendix F**). The report considers 6 trees, 3 of which are located within the subject site while 2 are street trees in the Cecily Street road reserve and the remaining tree is within a neighbouring property.

The report recommends the removal of 2 existing trees within the site that are either located within the proposed development footprint or that would be impacted by an unavoidable major encroachment within the tree protection zone (Tree No. 3 and 6). The report also recommends the removal of 1 tree within the Cecily Street road reserve that would be impacted by the proposed driveway and vehicle access (Tree No 4).

The report recommends retention of 3 trees, one being within the site, another within the road reserve and the third being within a neighbouring property (Tree No. 1, 2 and 5). These trees will be retained and protected in accordance with Tree Management Plan contained within the Arboricultural Impact Assessment (**Appendix F**).

More appropriate replacement planting of tree species are proposed, as indicated on the landscape plan and details. The new plantings will provide replacement tree cover on the site and increase the variety of species, including flowering trees, which will provide additional habitat for fauna in the long-term.

There will be no significant impact on native fauna as a result of the proposed development, given that compensatory planting is proposed.

Mitigation measures

Works within the Tree Protection Zone of retained trees on the site are to be undertaken using tree sensitive excavation and construction techniques such as pier and beam construction with suspended sections to reduce any impact on their stability, with piers to be dug by hand using non-motorised machinery to further assist in their protection. Retained trees are to be protected in accordance with the Tree Protection Plan contained within the Arboricultural Impact Assessment (refer **Appendix F**).

If associated infrastructure (pipe works) are to be installed within the Tree Protection Zone of any retained specimen, they are to be installed by hand with non-motorised machinery. If structural roots are found within the trench, they are to be left intact and dug around retaining this specimen's structural integrity with works to be undertaken in consultation with the project arborist (refer to Identified Requirement no.79).

Any excavations must be supervised and certified by the Project Arborist in accordance with AS4970 (2009) (refer to Identified Requirement no.44).

7.10 Heritage (European / Indigenous)

No heritage items are identified in Strathfield Council's Section 10.7(2) & (5) Planning Certificates located on or in the vicinity of the site.

Aboriginal Heritage

An Aboriginal Heritage Information Management System (AHIMS) search, dated 9 December 2020 (**Appendix N**) did not find any record of Aboriginal Sites or Places on the site or in the surrounding locality and the site is considered to be disturbed land. Consideration of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*, determined that no additional investigation was warranted. Discovery of cultural material during development activities cannot be ruled out, however, an identified requirement has been applied should any Aboriginal relics be discovered on the site during excavation/construction.

Other Cultural Heritage

No cultural heritage items have been identified in Strathfield Council's Section 10.7(2) & (5) Planning Certificates and the likelihood of any heritage relics being discovered during excavation / construction is considered to be minimal.

Mitigation Measures

A standard identified requirement (no.46) has been applied should any cultural heritage relics be discovered on the site during excavation / construction.

7.11 Soils / Contamination / Acid Sulfate Soils / Salinity

Geotechnical

A Geotechnical Site Investigation and Acid Sulfate Soil Assessment Report, prepared by STS Geotechnics indicates the following:

- The subsurface conditions generally consist of topsoil overlying silty clays and weathered shale. The topsoil is present to depths of 0.3 to 0.4 metres. Firm to stiff becoming very stiff silty clays underlie the topsoil to depths of 1.2 to 1.7 metres. Weathered shale underlies these soils to the depth of auger refusal, 1.5 to 2.1 metres.
- Groundwater was not observed during drilling works.

Mitigation Measures

An identified requirement (no.13) recommends that sediment control measures be implemented during demolition/construction in accordance with Council requirements and/or the guidelines contained in the Blue Book *Managing Urban Stormwater: Soils and Construction* (4th edition, Landcom, 2004).

Contamination

According to Council's Section 10.7(2) & (5) Planning Certificates, the land is not affected by a policy restriction relating to contaminated land.

Mitigation Measures

A standard identified requirement (no.17) has been recommended to cover the possibility of discovering site contamination during demolition / construction works.

Acid Sulfate Soils

According to Council's Section 10.7(2) & (5) Planning Certificates, the land is identified as being within Class 5 Land on the Acid Sulfate Soil Map under the SLEP2012.

Clause 6.1 of SLEP 2012 requires an Acid Sulfate Soil Management Plan for works on Class 5 Land that is within 500m of adjacent Class 1-4 Land below 5m AHD and by which the water table on adjacent Class 1-4 Land is likely to be lowered by 1m AHD.

A Geotechnical Site Investigation and Acid Sulfate Soil Assessment Report, prepared by STS Geotechnics assessed the significance of potential acid sulfate soils and determined that considering there is minimal proposed bulk excavation together with the absence of potential acid sulfate soils and that dewatering will not be required, an Acid Sulfate Management Plan is not required for the development.

Mitigation Measures

No mitigation measures are required.

Salinity

Council's Section 10.7(2) & (5) Planning Certificates indicate that the site is not affected by salinity.

Mitigation Measures

No mitigation measures are required.

7.12 Drainage / Flood Prone Land / Hydrology/ Water Quality

Stormwater drainage for the proposed development has been designed in accordance with Council's requirements. Stormwater will be collected via a series of stormwater pits and gutters on the site connected to an underground detention tank draining to the proposed street drainage pit within Cecily Street at the site frontage. A new stormwater drainage line is proposed within Cecily Street to cater for the development. The proposed stormwater infrastructure within the road reserve will connect to the existing pit at the frontage of 8 Cecily Street. Roof water from the subject development will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground detention tank.

The Section 10.7(2) & (5) Planning Certificates issued by Council for the subject site indicate that the land is not subject to flood related development controls.

The proposed development has been designed to have no adverse impact on the hydrology or water quality within the local area.

Mitigation Measures

Identified requirements (No.6-9, 14 & 34) have been recommended to ensure that stormwater drainage is managed in accordance with legislative requirements.

7.13 Bushfire Prone Land

The Section 10.7(2) & (5) Planning Certificates issued by Strathfield Council for the subject site advise that the land is not bushfire prone.

Mitigation Measures

No mitigation measures are required.

7.14 Noise and Vibration

During Demolition / Construction

During demolition/construction typical noise levels associated with demolition/ building works will be generated within the hours prescribed under Department of Environment, Energy and Science guidelines and/or in accordance with the local council requirements.

During Occupation

Noise generated when the proposed buildings are completed and occupied will be entirely in keeping with their residential surroundings. No major plant or equipment, which would generate unacceptable noise during occupation, will be installed in the proposed development.

Buildings will be constructed to comply with the deemed-to-comply provisions of the *National Construction Code* with respect to noise transmission.

Mitigation Measures

Demolition/construction noise will be controlled to within acceptable limits by sound attenuation measures and undertaking construction activities within EPA/local council requirements.

Buildings will be constructed to comply with the deemed-to-comply provisions of the *Building Code of Australia* and EPA criteria with respect to noise transmission.

Appropriate standard identified requirements (no.2, 59, & 60) have been applied to ensure compliance with the above mitigation measures.

7.15 Air Quality

Temporary and localised air quality impacts including dust, smoke, grit, odours, and fumes might be generated during the clearing and excavation of the site and construction of the proposed development.

Mitigation Measures

Appropriate standard identified requirements (no.64 & 65) have been applied that will satisfactorily mitigate any potential or adverse impacts on air quality.

7.16 Waste Minimisation

The following waste minimisation and management measures have been identified and are to be considered in conjunction with the specific details, including the estimated quantities of waste, provided in the final waste management plan to be prepared by the demolition/building contractor.

During Demolition

Demolition materials will be stored wholly within the site prior to removal for recycling or disposal. Demolition waste will be removed from the site to an approved waste management facility or will be recycled, as follows:

- concrete and bricks will be transported to an approved building waste collection facility;
- any asbestos sheeting and fibrous insulation will be handled according to SafeWork NSW requirements and disposed of to an approved building waste collection facility;
- mixed demolition materials will be transported to an approved building waste collection facility; and
- timber, metal, wall and roof cladding and other salvageable materials will be resold to various salvage yards where appropriate or disposed of at an approved building waste collection facility.

Specific intentions for recycling / re-use / disposal of demolition waste will be determined by the demolition contractor prior to commencement of demolition.

During Construction

Construction materials must be stored wholly within the site prior to removal for recycling or disposal. Construction materials waste must be removed from the site to an approved waste management facility or shall be recycled as follows:

- bricks, tile and concrete to be transported to building recycling facility;
- concrete shall be crushed and reused for filling, levelling or temporary road base;
- tiles shall be crushed and reused for filling, levelling or temporary road base;
- timber shall be sent to second hand suppliers;
- plasterboard shall be sent to building recycling facility; and
- metal offcuts from gutter and downpipes, etc. shall be recycled wherever possible.

During Occupation

General and non-recyclable waste will be disposed of in Council's standard waste storage bins located in the garbage storage enclosures and placed on the street kerb by LAHC contractor for collection by Council's waste services.

Paper / metal / glass will be disposed of in Council's standard waste recycling bins to be located in the garbage storage enclosures and placed on the street kerb by LAHC contractor for collection by Council's waste services.

Mitigation Measures

Standard identified requirements (no.39b & 48-56) are recommended to ensure construction/demolition waste is appropriately managed and disposed of.

A standard identified requirement (no.45) is recommended to require the preparation of a final waste management plan for the demolition, construction and occupation phases of the development.

7.17 Resource Use & Availability

The proposed activity will not result in any discernable depletion or degradation of natural resources. The proposal has been designed to meet water and energy efficiency targets as demonstrated by the BASIX certificate for the proposal.

The recycling and reuse of materials during demolition, construction and on-going occupation of the proposed development will reduce the consumption of natural resources.

The proposed development is for replacement of existing housing that has reached the end of its economic lifespan. The proposed development will provide contemporary housing that will satisfy current State Government environmental sustainability requirements, particularly through improved energy and water efficiency. These factors will ensure reduced depletion and degradation of natural resources in the long term.

Mitigation Measures

No additional mitigation measures are required.

7.18 Community / Social Effects

The proposed development will generate a number of positive community and social effects. The proposed development will:

- assist LAHC in meeting its significant, long-standing and continually-growing demand for social housing in the Strathfield local government and surrounding area;
- assist LAHC in improving the amenity of accommodation for its tenants, by providing new, more appropriate housing aligning with demand for social housing;
- improve the environmental sustainability of housing on the site, particularly through improved energy and water efficiency; and
- provide more accessible housing on the site.

Mitigation Measures

No mitigation measures are required.

7.19 Economic Impact

The proposed development is likely to contribute to a range of economic benefits in the Strathfield local government and surrounding areas through:

- more efficient use of land resources, existing infrastructure and existing services;
- local sourcing of construction materials;
- the local sourcing of tradesmen and other construction-related professionals;
- on-going consumption from new/ additional households;
- the reduced maintenance costs of the newer housing; and
- savings associated with improved energy and water efficiency.

Mitigation Measures

No mitigation measures are required.

7.20 Cumulative Impact Assessment

The proposed activity is not likely to have singular or cumulative environmental impacts which would result in unacceptable adverse effects for the following reasons:

- The proposed activity will not result in any adverse cumulative impact when considered in conjunction with any other proposals or developments in the area;
- there will be no synergistic effects of individual project impacts from the proposed activity when considered in combination; and
- there are no known environmental stresses in the area of the proposed activity that would be increased.

Mitigation Measures

No mitigation measures are required.

8. Conclusion

8.1 Summary of Key Issues Raised in Assessment

The proposed activity, given its scale, location and design, will be sympathetic with its residential environment. Following a review of the site constraints, it has been determined that the subject land does not contain any significant environmental hazards and that there are no key issues that have been identified that require further assessment.

The proposed activity has been considered in terms of the provisions of Section 5.5 of the EP&A Act and Section 171 of the EP&A Regulation. In this regard, following an analysis of the potential impacts associated with the proposed activity it was determined that an environmental impact statement is not required.

As demonstrated in this REF, the proposed activity is consistent with the relevant objectives and standards set out in the Housing SEPP, SLEP2012, and the design principles and better practices set out in the relevant guidelines.

The environmental impact analysis and assessment undertaken in this REF demonstrates that, any negative environmental impacts resulting from the proposed activity can be mitigated to an acceptable level in accordance with current applicable standards. Further, the activity will result in a number of positive environmental effects in terms of the built environment and will deliver a range of social and economic benefits.

The proposed development will enable LAHC to meet the increasing demand for one and two bedroom seniors housing dwellings in the local area. Therefore, the proposed development clearly in the public interest.

8.2 Recommendation

Given the above review of environmental factors, it is recommended that LAHC proceed with the proposed activity subject to the implementation of the Identified Requirements listed in **Appendix C** of this REF.

APPENDIX A – SECTION 10.7 CERTIFICATES

APPENDIX B – NOTIFICATION & CONSULTATION

APPENDIX C – IDENTIFIED REQUIREMENTS

APPENDIX D – SENIORS LIVING

APPENDIX E – DEVELOPMENT PLANS

APPENDIX F – ARBORIST REPORT

APPENDIX G – ACCESS REPORT

APPENDIX H – BASIX & NATHERS CERTIFICATES

APPENDIX I – BUILDING CODE OF AUSTRALIA COMPLIANCE REPORT

APPENDIX J – DBYD

APPENDIX K – SITE INVESTIGATION GEOTECHNICAL

APPENDIX L – WASTE MANAGEMENT PLAN

APPENDIX M – TRAFFIC REPORT

APPENDIX N – AHIMS SEARCH

APPENDIX O – TITLES & DP

APPENDIX P – SURVEY

APPENDIX Q – DESIGN COMPLIANCE CERTIFICATE & PART 5 CHECKLIST

APPENDIX R – FOOTPATH RECONSTRUCTION FOR BUS PATHWAY