

Kerry Robinson  
The Chief Executive Officer  
Blacktown City Council  
62 Flushcombe Road  
BLACKTOWN NSW 2148

Our ref: SUB22/235025

23 November 2022

## NOTICE OF PROPOSED SENIORS HOUSING

### Attention: Duty Planner

This letter is to notify Council of a proposal by the NSW Land and Housing Corporation (LAHC) to carry out a seniors housing development, and invite Council's written comments on the development proposal:

**Property:** 62 – 66 Pank Parade, Blacktown NSW 2148  
Lots 46, 47 & 48 in DP 32163

**Proposal:** Demolition of three (3) dwellings, associated structures and tree removal, and construction of a seniors housing development containing twelve (12) dwellings, comprising 6 x 1-bedroom and 6 x 2-bedroom units, parking for six (6) vehicles, associated site works and landscaping, and consolidation of three (3) lots into a single lot.

The proposal is considered 'development without consent' under the *State Environmental Planning Policy (Housing) 2021*. LAHC is seeking feedback from Council and neighbours for consideration before deciding whether the development should proceed.

The following plans and documents are enclosed for Council's review and comments:

- Survey plan
- Site analysis plan
- Architectural plans
- Architectural Statement
- Demolition plan
- Block analysis plan
- Landscape plan
- Stormwater plan
- Erosion and sediment control plan
- BASIX & NatHERS Certificate
- Building Code of Australia Report
- Access Report
- Arborist Report
- Geotechnical Report
- Traffic Report
- Waste Management Plan

Please email Council's comments to Carolyn Howell, Executive Planner, LAHC at [Carolyn.Howell@fac.s.nsw.gov.au](mailto:Carolyn.Howell@fac.s.nsw.gov.au) by 16 December 2022.

Should you wish to discuss the proposal, please contact LAHC by emailing [CommunityEngagement@fac.s.nsw.gov.au](mailto:CommunityEngagement@fac.s.nsw.gov.au) or calling 1800 738 718.

Yours sincerely



Ben Grogan  
Director, Community Engagement  
NSW Land and Housing Corporation

Our reference: SUB22/234968

The Resident(s)  
55 Pank Parade  
BLACKTOWN NSW 2148

If you need help reading this letter, call the Translating and Interpreting Service (TIS National) on **131 450**



23 November 2022

Hello Neighbour

I recently wrote to you about the NSW Land and Housing Corporation redeveloping the social housing site at 52 – 56 Pank Parade and 62 – 66 Pank Parade Blacktown.

### What we are proposing

At 52 – 56 Pank Parade, Blacktown we are proposing to replace the existing aged properties with a two-storey senior's housing development to better suit the needs of residents. This will include:

- 12 homes in total — 6 x one-bedroom units and 6 x two-bedroom units
- 6 on-site car parking spaces
- landscaping and fencing across the site
- lot consolidation

At 62 – 66 Pank Parade, Blacktown we are proposing to replace the existing aged properties with a two-storey senior's housing development to better suit the needs of residents. This will include:

- 12 homes in total — 6 x one-bedroom units and 6 x two-bedroom units
- 6 on-site car parking spaces
- landscaping and fencing across the site
- lot consolidation

### What we heard from you

We'd like to thank the community who provided feedback during the first round of consultation in October 2022. The key themes raised included the proposed two-storey designs and potential privacy impacts, on-site car parking and potential local traffic and street parking impacts. In response to this feedback I can confirm:

- The size of the development along with the placement and type of windows, privacy screening, screen planting along the site boundaries and other design requirements are carefully considered during the design to minimise visual and acoustic privacy impacts to neighbouring properties.
- The traffic and parking report concludes that the additional traffic movements are not expected to have any negative impacts on the local street network.
- In relation to car parking, the proposed developments are provided with 6 car parking spaces on each of the sites, which meets the requirements of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP).

## Department of Planning and Environment

### Why we are redeveloping the site

Redeveloping the site is important to:

- create more social housing properties to help reduce the waitlist, which includes more than 50,000 households from NSW
- help people and families in need by providing them with a safe place to call home
- improve the appearance of the ageing housing to better match the character of the local area

### What we'd like to hear from you

We would like your feedback on the proposed designs for new housing.

To help, we have attached a set of plans for each development for you to consider which can also be emailed to you by contacting the Community Engagement Team. In these plans, you will find:

- an artist's impression of the proposed designs to give you an idea of what it will look like
- site and landscape plan
- building elevations
- proposed materials and colour finishes
- shadow diagrams

### How to give feedback

You are welcome to give your feedback to the Community Engagement Team by emailing [CommunityEngagement@facns.nsw.gov.au](mailto:CommunityEngagement@facns.nsw.gov.au) or calling 1800 738 718.

Any feedback will be kept confidential and should be provided **by 16 December 2022** to give us enough time to consider it. We will respond to all feedback that is submitted.

### Next steps

Feedback will help us understand what is important to the community and will be considered by the project team before a decision is made on whether the project will proceed.

If you have any questions or would like more information about the Land and Housing Corporation, please visit our website via the QR code or URL or contact the Community Engagement Team using the details above.

Yours sincerely,

A blue ink signature of Ben Grogan.

Ben Grogan  
Director, Community Engagement  
NSW Land and Housing Corporation



Scan for more information or visit:  
<https://www.dpie.nsw.gov.au/land-and-housing-corporation>

#### About the Land and Housing Corporation

Delivering housing is much more than providing people with a roof over their head. Having access to safe housing assists people to pursue health, education and employment opportunities, allowing them to thrive and strengthen the communities where we all live. At NSW Land and Housing Corporation, our role is to actively grow and manage the supply of the right types of housing, at the right time, in the right areas, for people in need in our communities.

To find out more about our story please visit our website via the QR code or visit <https://www.dpie.nsw.gov.au/land-and-housing-corporation>



Your ref: SUB22/235025  
File no: C22/58516

16 December 2022

NSW Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Recipient Delivery Carolyn.Howell@fac.s.nsw.gov.au

**Attention: Carolyn Howell**

Dear Carolyn

**SUB22/235025 - Notification of a proposal by the NSW Land and Housing Corporation to carry out a seniors housing development at 62 - 66 Pank Parade, Blacktown**

Thank you for your correspondence dated 23 November 2022 requesting our written comments on the above proposal.

The supporting documents have been reviewed by Council officers and we object to the proposal in its current form. Council officers have indicated that a number of issues need to be addressed as outlined in the attachment to this letter.

Council requests that these matters are comprehensively addressed and returned back to Council for further comment and consideration before any determination is made on whether to proceed with this development by the Land and Housing Corporation.

If you would like to discuss this matter further, please contact Jared Spies, our Senior Development Assessment Planner on 9839 6000.

Yours faithfully

Judith Portelli  
Manager Development Assessment

**Connect - Create - Celebrate**

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148



# Blacktown City Council's submission to SUB22/235025

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## 1. Planning

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- a. It is noted that the development has 2 storeys, but there is no mechanism to access the 1<sup>st</sup> floor in the event that a resident on the 1<sup>st</sup> floor becomes frail or develops a mobility issue over time that would prevent them from using the stairs. It is unclear how will Land and Housing Corporation ensure residents are able to age in place in line with the Seniors Housing Adaptable standards.
- b. More information is required to show how the internal stairs can be adapted to include chair lifts.
- c. Provide a justification for exceeding the maximum Floor Space Ratio of 0.5:1 prescribed by Clause 108 of State Environmental Planning Policy (Housing) 2021, noting that the density and scale of Pank Parade is predominantly characterized by single storey dwellings.
- d. The development should provide a suitable common room facility. The common room shall be centrally located and easily accessible to all residents.
- e. The roof will benefit from additional solar panels as environmentally sustainable development is encouraged.

## 2. Environmental Health

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- a. No acoustic report or site contamination report have been provided

## 3. Waste

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- a. In accordance with BDCP 2015 Part G (adopted March 2022), onsite collection of waste is required from a designated loading bay with waste rooms incorporated into the building footprint at ground level. Kirk McDonald was provided this information on 14/11/22 when he called for waste advice.
- b. Waste management plan states that "the development will adopt Council's waste management policy" however, the proposal seeks kerbside collection (page 5), which is not supported and does not comply with our new waste DCP.
- c. Traffic report also states kerbside collection arguing that collections will be "infrequent" and will "occur outside peak periods" (excerpt below). This is incorrect.
  - residents will be getting a third bin for organics in 2025 where all 3 bins will be collected fortnightly from 3 different trucks. Each rateable property is entitled to 12 'on call' household clean ups a year for discarded bulky waste such as furniture. That is a collected by a 4th truck. Each rateable property is entitled to mattress collections (conducted as part of our 'on call' household clean up service) which are collected by a 5th truck. There are 5 separate trucks that will be servicing this site for waste alone. This does not include removalists and

delivery trucks that also need to attend the site and could use the loading bay so they are not blocking the street by parking in the road.

- Council does not provide waste collection windows due to staff shortages, truck breakdowns, traffic delays and other unforeseen circumstances. We cannot support development designs reliant on waste collection windows.
- 28m of suitable unobstructed frontage is required clear of driveways, light and power poles, traffic management devices, street furniture, bus stops, landscaping and trees for kerbside collection of bins in single file. This consumes the entire frontage and will detract from the streetscape. Bulky waste items placed for collection will also take up additional space on the same day as the bins are collected if also placed at the kerbside.
- the issue of kerbside collection is further exacerbated by the high potential for missed services with so many bins presented kerbside being blocked by parked cars. Trucks then need to return to the site again to service them. A designated loading bay is the requirement to ensure safe, efficient and effective collection of waste and to reduce unnecessary truck movements.

#### Refuse Collection

The development proposes all refuse collection be undertaken utilising the existing on-street collection service on Pank Parade. Bin storage areas are proposed along the northern frontage of the site from which, bins would be transferred onto Pank Parade for collection.

It is emphasised that refuse collection will occur on an infrequent basis and typically outside on-street peak periods. As such, the existing on-street collection is considered appropriate and supportable, given the nature and scale of the proposed development.

- d. Waste storage areas in the front set-back (as proposed – excerpt below) are no longer supported. These are older, problematic designs we have moved away from to:
- protect streetscape
  - reduce manual handling as storage and collection are now co-located onsite
  - prevent missed services due to competition with parked cars at the kerbside
  - avoid challenges in getting approval for “no parking” signage on public roads
  - eliminate litter from wind/over-flowing bins as bins stored inside buildings
  - avoid anti-social behaviour such as illegal dumping, graffiti and/or arson by incorporating waste rooms into the building footprint so they ‘belong’
  - allow smoother waste collection that is safe, efficient and cost effective





- e. Generation rates are inadequate. Only 6 bins have been provided for waste for 12 units. Therefore, the number of bins and the size of the bin storage areas are also insufficient. Generation rates have been provided to assist with amended design.
- f. Applicant must consult Part G of the BDCP 2015 and associated waste guideline for more detailed information. Both are on our website and both are used to assess waste proposals in new developments. Kirk was advised of this during our call on 14/11/22. Website link here - <https://www.blacktown.nsw.gov.au/Plan-build/Stage-2-plans-and-guidelines/Blacktown-planning-controls/Blacktown-Development-Control-Plan-2015>
- g. If design is not compliant with the BDCP 2015 Part G and waste guideline requirements, the site will need to be serviced by a private waste and recycling contractor at the Body Corporate's/operator's expense in perpetuity where residents will not be able to access Council's waste, recycling, organics, mattress or household clean up services for the life of the development.
- h. Allow for the following waste and recycling generation rates:
  - 240L/week/unit for waste (to be collected in 1100L bulk bins onsite)
  - 80L/week/unit for recycling (to be collected in 240L bins onsite)
  - 240L/week/unit for organics (to be collected onsite)
- i. Allow for the following bin capacities for communal waste arrangements:
  - 1100L bulk bins for waste
  - 240L bins for recycling
  - 240L bins for organics
- j. Cater for the following collection frequencies (for the required onsite bulk bin arrangement):
  - waste to be collected up to 3 times a week

- recycling collected once a week
  - organics collected once a week
- k. Provide a suitable enclosed, weatherproof and secure bin storage area incorporated into the building footprint at ground level. This space must also cater for the required bulky waste storage area.
  - l. Provide 4m<sup>2</sup> of storage for discarded bulky waste items such as lounges and fridges etc:
    - must be located adjacent to the loading bay, caged and sign posted for this use
    - doors must be a minimum 1.5m wide
    - waste management plan must be updated to this effect
  - m. Ensure bulky waste storage is the correct size excluding the surface area for the doors. A roller door may be better.
  - n. Ensure any doorway used to move bins and bulky waste around, is a minimum 1.5m wide to aid movement of waste bins and discarded bulky waste such as lounges and fridges.
  - o. Ensure maximum walk distance for residents with bagged rubbish does not exceed 30m.
  - p. Ensure bin transfer grades do not exceed 1:24 for 1100L bulk bins.
  - q. Ensure resident access to the waste room is not via the loading bay where waste collection vehicles are moving and reversing. Waste collection contractors may need a second access to this space through the loading bay.
  - r. Ensure the bin and bulky waste collection point can accommodate all the bins from the other waste rooms without impacting traffic flow onsite. Bins must not spread into the driveway area.
  - s. Provide an onsite loading bay collection point adjacent to the ground level bin and bulky waste storage areas. It must be located towards the rear of the site and behind the building line. Ground level collection in the front set back is not supported by the City Architect.
  - t. Ensure the designated loading bay can accommodate the entire length of the truck plus an additional 3m rear clearance for bin servicing and rotation. The truck must not over hang the loading bay hindering traffic flow onsite.
  - u. Provide physical treatment to the loading bay (eg, lockable, removable bollards), to prevent unauthorised parking:
    - truck turning areas must be maintained
    - access must be coordinated by the building manager
    - the waste management plan must be updated to this effect
  - v. Provide a vertical cross section plan demonstrating a 4m headroom allowance clear of eaves, overhangs, balconies, services, sprinklers etc, for the trucks entire travel path. Please note, your development will also need to comply with Council's traffic



requirements which may require 4.5m in accordance with AS2890.2 for access by removalist and delivery vehicles, and emergency vehicles.

- w. Provide swept paths for a 10.5m long, heavy rigid vehicle with a 24m turning circle for the trucks entire travel path showing forward entry and exit with all manoeuvring onsite. 3 point turns onsite are acceptable.
- x. Amend the demolition and construction section of the waste management plan to:
  - specifically identify off-site reuse and recycling opportunities and landfill destinations.
  - specifically identify volumes of waste generated during demolition activity. Currently the demolition table states “NA” but then also states that waste will “be removed from the site for recycling”.
    - The purpose of this part of the waste management plan is demonstrate that the management of waste from demolition and construction activity has been carefully thought out before any work starts onsite.
- y. Amend the ongoing use section of the waste management plan to include:
  - number of units/dwellings
  - number of bins for the development
  - bin collection frequencies
  - bin capacities
  - proposed service provider
  - waste and recycling generation rates for the proposed use(s)
  - location of onsite waste collection point and loading bay
  - the proposed physical treatment of the loading bay (eg, removable, lockable bollards), to prevent unauthorised parking
  - provision of bulky waste storage, its size and location
  - that access to the loading bay must be coordinated the building manager

#### **4. Drainage**

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- a. The by-pass area of the OSD calculation table is not consistent with the by-pass area on the submitted drawing. The applicant must provide a catchment area plan to confirm the by-pass areas of the OSD.
- b. The OSD calculation table must also be amended as the above. The actual spreadsheet of the OSD calculation should be submitted.
- c. The combined tank details must be provided. The weir of each chamber must be listed and marked on the submitted plan. A detailed plan of the tanks must be provided, including at least 3 sections to indicate the design level of the chamber.

- d. No design details of the WSUD chamber has been submitted. The filtering product in the proposed WSUD chamber must be listed and approved in Council's WSUD developer handbook. The minimum submission requirements must be provided in accordance with Council WUSD Developer Handbook and Council's standard drawing A(BS)175M. And a MUSIC model must also be provided to ensure the water quality target has been achieved.
- e. A new pit and pipe are proposed on Pank Parade. However, Council does not accept 300 mm diameter pipe. The minimum pipe size is 375 mm diameter. Also, the design details of the pit and pipe must be provided in accordance with Engineering Guide for Development 2005.