



REVIEW OF ENVIRONMENTAL FACTORS



Proposed Seniors Housing Development

at

2-8 Glenn Avenue, Northmead NSW, 2152

December 2022

Prepared by:
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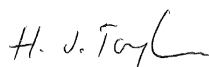
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2. I do not consider I have any personal interests that would affect my professional judgement.
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Date:

24 January 2023

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1. Executive Summary

The subject site is located at 2-8 Glenn Avenue, Northmead NSW, 2152 and is legally described as Lots 73 – 76 in Deposited Plan 35845.

The proposed activity is described as follows:

Demolition of 4 existing dwellings and associated structures, removal of trees, and the construction of a 16 dwelling seniors housing development comprising 8 x 1-bedroom and 8 x 2-bedroom independent living units, associated landscaping and fencing, surface parking for 8 cars and consolidation into a single lot

The proposed activity is located in a prescribed zone (R2 Low Density Residential) and can therefore be carried out by the NSW Land and Housing Corporation (LAHC) without consent under the provisions of Part 5, Division 8 of *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) as it does not result in more than 40 dwellings on the site and does not exceed 9.5 metres in height.

Demolition has been considered as part of the proposed development activity. Demolition is permitted with consent under the provisions of the *Parramatta Local Environmental Plan 2011* (PLEP 2011) as amended 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).

A Review of Environmental Factors (REF) has been undertaken of the proposed development activity under Part 5 of the EP&A Act and Part 8 of the EP&A Regulation.

The REF demonstrates the following:

- from an analysis of the environmental impacts associated with the proposed activity, it has been determined that preparation of an Environmental Impact Statement is not required;
- based on a review of 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 Parramatta City 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;
- Sydney Water was consulted under section 57 of the *Heritage Act 1977*; 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.

City of Parramatta Council and occupiers of adjoining land were notified of the proposed activity under the provisions of the Housing SEPP. A response was received from Council dated 24 August 2022. Comments on the response are provided in Section 7.1 of this REF. Submissions were received from 3 occupiers of adjoining land. Comments on the submissions are provided in Section 7.2 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 REF under Part 5 of the EP&A Act is for an activity involving the demolition of 4 existing dwellings and associated structures, removal of trees, and the construction of a 16 dwelling seniors housing development comprising 8 x 1-bedroom and 8 x 2-bedroom independent living units, associated landscaping and fencing, surface parking for 8 cars and consolidation into a single lot at 2-8 Glenn Avenue, Northmead, NSW 2152.

The activity* is to be carried out by, or on behalf of, LAHC and is 'development without consent' under the Housing SEPP.

This REF has been prepared by LAHC in satisfaction of the provisions of Part 5 of the EP&A Act and Part 8 of the EP&A Regulation.

A Statement of Compliance accompanying this REF certifies that in accordance with the requirements of Part 5 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.*

3. Project Description

3.1 Summary of Proposed Activity

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

Architectural

- Barry Rush and Associates Pty Ltd -
 - A01, Rev A dated 12.04.2022 – Cover Sheet
 - A02, Rev A dated 12.04.2022 – Site Analysis Plan
 - A03, Rev A dated 12.04.2022 – Demolition Plan
 - A04, Rev B dated 11.10.2022 – Site and Ground Floor Plan
 - A05, Rev A dated 12.04.2022 – First Floor Plan
 - A06, Rev A dated 12.04.2022 – Roof Plan
 - A07, Rev B dated 11.10.2022 – Elevations
 - A08, Rev B dated 11.10.2022 – Sections
 - A09, Rev A dated 12.04.2022 – Areas of Excavation and Fill
 - A10, Rev A dated 12.04.2022 – Finishes Schedule
 - A11, Rev A dated 12.04.2022 – Shadow Diagrams Mid-Winter
 - A12, Rev A dated 12.04.2022 – Views from Sun Diagram
 - A13, Rev A dated 12.04.2022 – Street Perspective
 - A14, Rev A dated 12.04.2022 – Block Analysis Plan

Landscape

- Greenland Design Pty Ltd, landscape consultant –
 - LA 1 of 2, Rev H dated 12.10.2022 – Landscape Plan
 - LA 2 of 2, Rev H dated 12.10.2022 – Landscape Details and Specifications

Soil and water management

- ACOR Consultants (CC) Pty Ltd, consulting engineers –
 - C1, Rev D dated 09.10.2022 – Cover Sheet & Notes
 - C2, Rev D dated 09.10.2022 – On Site Detention Catchment Plan
 - C3, Rev D dated 09.10.2022 – Stormwater Management Plan – Part 1
 - C4, Rev D dated 09.10.2022 – Stormwater Management Plan – Part 2
 - C5, Rev D dated 09.10.2022 – Stormwater Management Plan Details Sheet No. 1
 - C6, Rev D dated 09.10.2022 – Stormwater Management Plan Details Sheet No. 2
 - C7, Rev D dated 09.10.2022 – Erosion & Sediment Control Plan
 - C8, Rev D dated 09.10.2022 – Erosion & Sediment Control Notes & Details
 - C9, Rev D dated 09.10.2022 – OSD Calculation Sheet & Maintenance Schedule
 - C10, Rev D dated 09.10.2022 – On Site Detention Checklist Sheet 1 of 2
 - C11, Rev D dated 09.10.2022 – On Site Detention Checklist Sheet 2 of 2
 - C12, Rev D dated 09.10.2022 – Pipe Long Section
 - C13, Rev D dated 09.10.2022 – Stormwater Quality Report Sheet 1 of 2
 - C14, Rev D dated 09.10.2022 – Stormwater Quality Report Sheet 2 of 2

Survey

- Indiya Geospatial Survey Consultants Pty Ltd, consultant surveyors –
 - Sheet 1 of 4, Rev B dated 23.09.2020 – Site Detail Survey (2 Glenn Avenue)
 - Sheet 2 of 4, Rev B dated 23.09.2020 – Site Detail Survey (4 Glenn Avenue)
 - Sheet 3 of 4, Rev B dated 23.09.2020 – Site Detail Survey (6 Glenn Avenue)
 - Sheet 4 of 4, Rev B dated 23.09.2020 – Site Detail Survey (8 Glenn Avenue)
 - Sheet 1 of 1, Rev A dated 22.10.2020 – Long Section
 - Sheet 1 of 1, Rev A dated 20.10.2020 – Site Detail Survey ‘Sewer Protection Report’

BASIX / NatHERS

- Building Sustainability Assessments, accreditation no. DMN/13/1491
 - BASIX Certificate No 1230456M_02, dated 22 April 2022
 - NatHERS Certificate No 0007598450, dated 22 April 2022

Specialist reports

- STS Geotechnics Pty Ltd, geotechnical consultant –
 - Geotechnical Investigation, dated October 2020
- Apex Engineers, traffic consultant –
 - Traffic Impact Assessment, dated June 2022
- Redgum Horticultural, arborist –
 - Arboricultural Impact Assessment, dated 19 May 2022
- BCA Access, access consultant –
 - Access Assessment Report dated 15 May 2022
- BCA Vision Pty Ltd, BCA consultant –
 - BCA Design Compliance Report dated 27 April 2022
- Barry Rush and Associates Pty Ltd, architectural consultant –
 - Site Waste Minimisation and Management Plan dated 25 October 2021

Design compliance and checklists

- Seniors Living Policy: Urban Design Guidelines for Infill Development Checklist
- Housing SEPP Design Compliance Table
- Architect’s Certificate of Building Design Compliance, dated 03.06.2022
- Engineer’s Certificate of Design Compliance, dated 21.04.2022
- Landscape Architect’s Certificate of Design Compliance, dated 01.06.2022

Supporting Information

- City of Parramatta Council:
 - Section 10.7(2) Planning Certificate No 2022/3808 – No. 2 Glenn Avenue, Northmead, NSW, 2152, Lot 76 DP 35845, dated 25.05.2022
 - Section 10.7(2) Planning Certificate No 2022/2946 – No. 4 Glenn Avenue, Northmead, NSW, 2152, Lot 75 DP 35845, dated 26.04.2022
 - Section 10.7(2) Planning Certificate No 2022/2945 – No. 6 Glenn Avenue, Northmead, NSW, 2152, Lot 74 DP 35845, dated 26.04.2022

- Section 10.7(2) Planning Certificate No 2022/3809 – No. 8 Glenn Avenue, Northmead, NSW, 2152, Lot 73 DP 35845, dated 25.05.2022
- Title search and Deposited Plans –
 - Certificate of Title, Folio 73/35845, dated 06.04.2020
 - Certificate of Title, Folio 74/35845, dated 06.04.2020
 - Certificate of Title, Folio 75/35845, dated 06.04.2020
 - Certificate of Title, Folio 76/35845, dated 06.04.2020
 - Deposited Plan 35845
- Heritage NSW (f.k.a NSW Office of Environment & Heritage) –
 - AHIMS Search, dated 15 November 2022

3.2 Demolition

This development includes demolition of 4 single storey brick and tiled roof dwellings and associated structures, as identified on the Demolition Plan (refer to **Appendix D**).

3.3 Removal of Trees

An Arboricultural Impact Assessment has been prepared for the site by Redgum Horticultural (**Appendix G**). The report recommends the removal of 5 existing trees (Tree Nos. 2, 3, 4, 5 and 10) on the site.

Tree removal within the site boundaries is recommended primarily to accommodate the proposed development and the individual species are recommended for removal as they are not considered to be significant or worthy of retention.

More appropriate tree plantings, including trees with mature heights between 5-12m, will be provided as part of the proposed landscaping scheme to compensate for the loss of these trees (refer to Landscape Plan in **Appendix D**).

3.4 Proposed Dwellings

The proposal is for 16 independent living units, comprising 8 x 1-bedroom dwellings and 8 x 2-bedroom dwellings. Access to the 8 ground floor units has been designed to be accessible. The ground floor 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. Refer to Development Plans at **Appendix D**.

The dwellings are contained within three separate two-storey buildings. Two of the buildings front Glenn Avenue and the other building is located at the rear of the site. Vehicular access is via a shared driveway located along the northern boundary of the site off Glenn Avenue. Pedestrian access is also from Glenn Avenue.

The proposed development represents a contemporary, high quality design, which will be an improvement on the existing dwellings located at the site. The proposed development is predominantly of face brick construction on the ground floor with metal wall cladding on the upper floor. Colorbond is proposed for the roof covering. The proposed materials, colours and finishes are consistent with the existing and developing character of the locality being a residential area with single and double storey attached and detached dwellings, of high-quality materials with consistent but variable natural colours.

Units 1 to 10 will address Glenn Avenue, with outdoor terraces on the ground floor, decks on the upper floor and living room windows facing the street for passive surveillance. Terraces and decks at the rear of these units, including the first floor balcony of unit 12, provide passive surveillance to the open space at the centre of the proposal.

To establish a suitable development footprint for the site and to provide access in accordance with the requirements of the Housing SEPP, the building footprint has been stepped across the site to minimise the extent of cut and fill required. The deepest extent of the cut is located toward the rear of the site, underneath the proposed carpark and units 12 and 13, where the depth of cut exceeds 1m over a total area of approximately 80m² or 2.8% of the site area (refer to the Areas of Excavation & Fill Plan in **Appendix D**). Some retaining walls, up to 1.4m in height, are proposed across the site to assist with stability (refer to Landscape Plans in **Appendix D**).

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 new trees, shrubs and groundcovers, which will enhance landscaped setbacks and contribute to the streetscape.

Each unit will be provided with its own enclosed private open space area. All these spaces are directly accessible from the living areas.

A total of 8 surface car parking spaces will be provided on the site, including 4 accessible spaces.

Stormwater will be collected via a series of stormwater pits and gutters on the site connected to an underground detention tank draining to the street drainage pit on the site frontage. Roof water will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground detention tank.

A new 1.8m high Colorbond fence is proposed along the side and rear boundaries. A combination horizontal and vertical slatted fence is proposed at the front of the development orientated to Glenn Avenue.

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

4. Existing Site & Locality

4.1 Existing Site and Immediately Adjoining Development

The site is commonly known as 2-8 Glenn Avenue, Northmead and is legally described as Lots 73 – 76 in Deposited Plan 35845. It is located in the Parramatta local government area (LGA) and comprises 4 residential allotments. Refer to Location Plan at **Figure 1** and aerial photo at **Figure 2**, below.

The site is located on the eastern side of Glenn Avenue, within a predominantly low-density residential neighbourhood, characterised by mid to late 20th century dwelling houses and developing 1-2 storey dual occupancy and townhouse style developments.

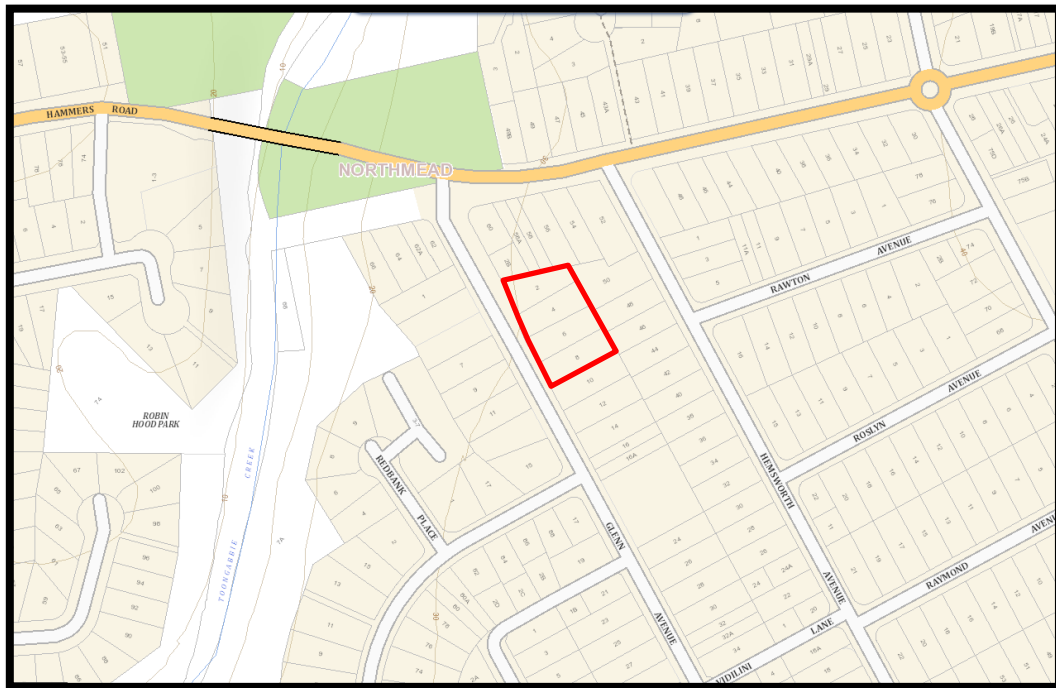


Figure 1: Location Plan
(Source: Six Maps)



Figure 2: Aerial photo of site
(Source: Sixmaps)

The site is currently occupied by 4 single storey brick and tiled roof dwellings (refer to photographs at **Figures 3, 4, 5 and 6**). The existing dwellings and associated structures on the site will be demolished to accommodate the proposed development.



Figure 3: Development site – 2 Glenn Avenue, Northmead
(Source: SMEC 2022)



Figure 4: Development site – 4 Glenn Avenue, Northmead (image left)
(Source: SMEC 2022)



Figure 5: Development site – 6 Glenn Avenue, Northmead
(Source: SMEC 2022)



Figure 6: Development site – 8 Glenn Avenue
(Source: SMEC 2022)

The property immediately to the north, 2B Glenn Avenue, contains a single storey detached dwelling (refer to **Figure 7**):



Figure 7: Adjoining Development – 2B Glenn Avenue, Northmead
(Source: SMEC 2022)

Immediately to the south, 10 Glenn Avenue contains a single storey weatherboard and tiled roof dwelling (refer to **Figure 8**).



Figure 8: Adjoining Development – 10 Glenn Avenue, Northmead
(Source: SMEC 2022)

4.2 Site Description

Copies of the Section 10.7(2) & (5) Planning Certificates (Nos. 2022/3808, 2022/2946, 2022/2945 and 2022/3809) are provided in **Appendix A**.

The development site has a total area of 2,813.7m², a frontage to Glenn Avenue of 69.57m, a southern side boundary of 45.42m, a northern side boundary of 42.27m and an eastern rear boundary of 57.285m (refer to the submitted Site Detail Survey – Sheets 1 to 4, **Appendix E**).

The site falls from a high point of RL35.6 in the south-east corner, to a low point of RL30.7 in its north-west corner, thus resulting in an elevation difference of approximately 4.9m across the site.

An easement for drainage of stormwater is not required.

Excluding trees that are exempt due to height or species, there are 7 trees within the site. There are also 10 trees located within adjoining properties and 1 tree located within the adjoining road reserve.

Water, electricity, sewer and communication services are available to the site (refer to the submitted Site Detail Survey – Sheets 1 to 4 at **Appendix E** for the location of available services). These services are located along the Glenn Avenue frontage of the development site, with the exception of the sewer.

Inter-allotment sewer lines traverse the front the site and the southern boundary of 6 Glenn Avenue.

The Northern Suburbs Ocean Outfall Sewer (NSOOS), which takes waste water from Blacktown to the North Head Water Resource Recovery Facility in Manly, is an item of heritage significance listed on Sydney Water's section 170 heritage register (**Appendix R**) and runs underneath the site at a depth of approximately 17-20 metres (invert). The location of the NSOOS is shown on the Site Detail Survey 'Sewer Protection Report' – Sheet 1 of 1, Rev A dated 20.10.2020 (**Appendix E**).

There are no other encumbrances on title, section 10.7 certificates or indicated on the submitted Site Detail Survey.

4.3 Neighbouring Development and Locality

The site is located within an established residential area which is characterised by predominantly older style single storey brick dwelling houses with tiled roofs. Some newer development is located in the immediate area, such as 16/16A Glenn Avenue, which is a modern-style dual occupancy development located south-east of the site (refer to **Figure 9**). Other examples of one and two-storey residential developments, including seniors housing, are shown in the photographs at **Figures 10, 11, 12 and 13**.



Figure 9: Development at 16/16A Glenn Avenue
(Source: SMEC 2022)



Figure 10: LAHC seniors housing development at 18-22 Glenn Avenue
(Source: SMEC 2022)



Figure 11: 46 Hemsworth Drive (immediately behind 8 Glenn Avenue)
(Source: SMEC 2022)



Figure 12: 50 Hemsworth Drive (immediately behind 4 Glenn Avenue)
(Source: SMEC 2022)



Figure 13: 7 Glenn Avenue, Northmead (directly opposite the site)
(Source: SMEC 2022)

4.4 Access to Services – Shops and Transport

There are 2 bus stops located on both sides of Glenn Ave, approximately 63m and 83m walking distance from the site as shown on the Long Section survey in **Appendix E**. These stops are serviced by Transdev Route 606 which connects Winston Hills to Parramatta via Northmead and Old Toongabbie, including other local centres.

5. Zoning and Permissibility

The site is zoned R2 Low Density Residential pursuant to *Parramatta Local Environmental Plan 2011* (PLEP 2011) (refer **Figure 14**).

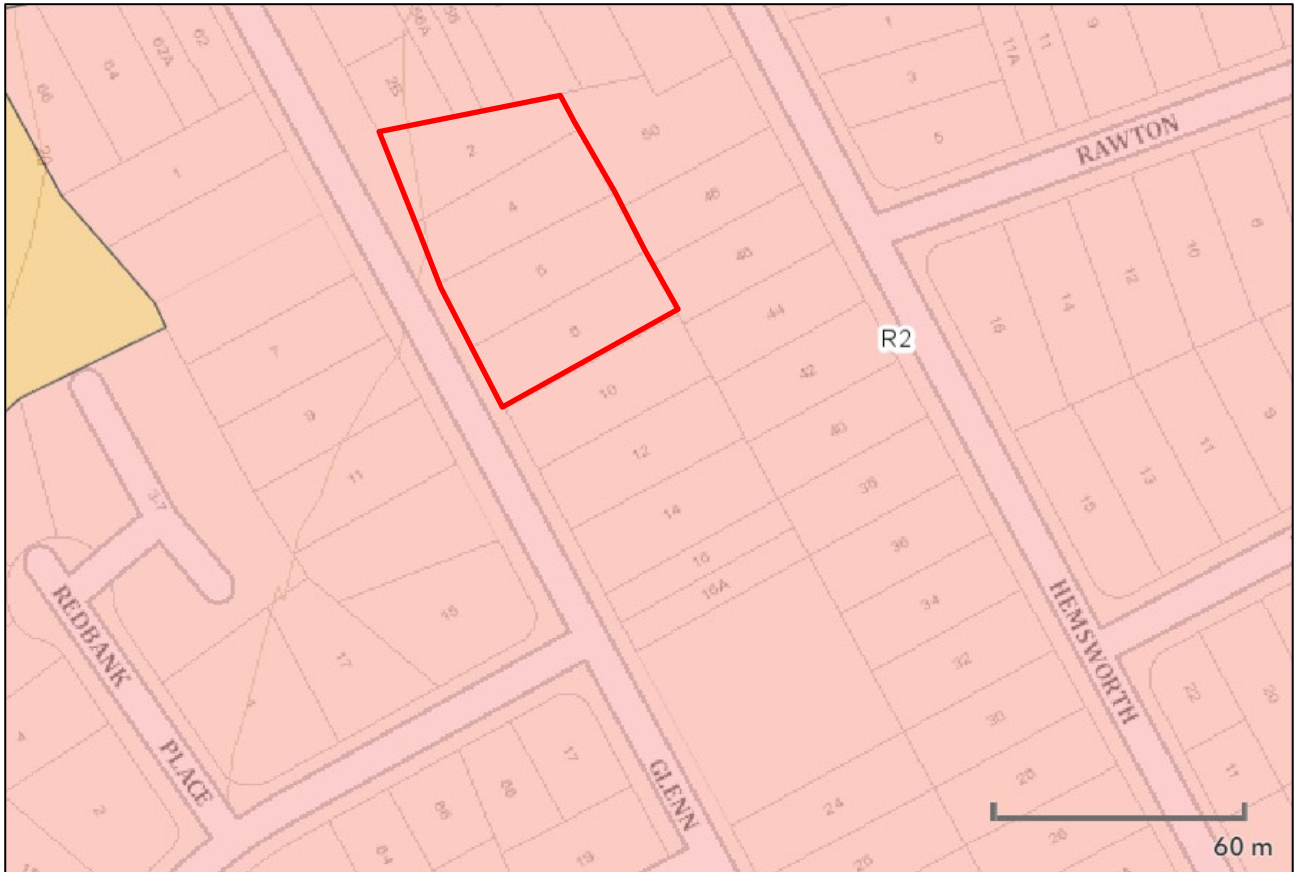


Figure 14: Land Zoning Map

(Source: ePlanning Spatial Viewer, extracted 28 June 2022)

The proposed development is defined as 'seniors housing' under the provisions of PLEP 2011 and is permissible with Council's consent in the R2 zone.

Seniors housing is permitted in the R2 zone under PLEP 2011, and 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 specific 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 objective of the R2 zone, as set out in PLEP 2011 is:

- *To provide for the housing needs of the community within a low density residential environment.*

The proposed development provides housing that meets the identified needs of the community and will be consistent with the objective.

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 section 6.1.5 of this REF demonstrates compliance with the relevant provisions of section 108B of the SEPP.

6. Planning and Design Framework

6.1 State Legislation

6.1.1 Environmental Planning and Assessment Act 1979

Duty to consider environmental impact [Section 5.5]

Section 5.5(1) of the EP&A Act states that, for the purpose of attaining the objects of the 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 of the EP&A Act.

Table 1: Matters for consideration under subsection 3 of Section 5.5 of the EP&A Act	
Matter for consideration	Effect of Activity
<p><i>Subsection 3</i></p> <p>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.</p>	<p>No effect, as the site and surrounding areas are not within a wilderness area (within the meaning of the <i>Wilderness Act 1987</i>).</p>

6.1.2 Biodiversity Conservation Act 2016

Part 7 of the *Biodiversity Conservation Act 2016* (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, the proposed activity is unlikely to significantly 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 ecologic community. The proposed activity will not be a key threatening process and the land is not part of, or in the vicinity of any, declared area of outstanding biodiversity value.

6.1.3 Other Acts

Heritage Act 1977

The Northern Suburbs Ocean Outfall Sewer (NSOOS) tunnel, a heritage item listed on the Sydney Water S.170 heritage register crosses the southern part of the site as shown on the Site Detail Survey (Heritage Protection Report) in **Appendix E**.

Pursuant to section 57 of the *Heritage Act 1977*, LAHC consulted with Sydney Water by letter dated 7 September 2022 (**Appendix B**)

Sydney Water – Environment and Heritage, responded by email dated 13 October 2022 and noted that:

‘...your proposed development / works are over the Northern Suburbs Ocean Outfall Sewer (NSOOS) that is listed as a heritage item by Sydney Water at the LOCAL level.

Ensuring that the works do not impact the NSOOS there are no heritage constraints.’

Identified requirement (No. 86) is recommended requiring a Specialist Engineering Assessment (SEA) to be undertaken and submitted to Sydney Water in accordance with the requirements set out in the Feasibility Letter to demonstrate there will be no adverse impact, or to nominate protection measures to prevent any adverse impact to the NSOOS.

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

6.1.4 Environmental Planning and Assessment Regulation 2021

Factors that must be taken into account concerning the impact of an activity on the environment [Clause 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 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 in force, the following must be taken into account:

(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	

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]
(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 or endangered animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)	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 future activities.	Y		x	
(p) impact on coastal processes and coastal hazards, including those under projected climate change conditions. [Note 3]	N/A			
(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 will trigger the need for an Environmental Impact Statement.

Note 2: This means guidelines in force under clause 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 6.1.5** of this report.

6.1.5 Strategic Planning Framework

Parramatta Community Strategic Plan 2018-2038

The Parramatta Community Strategic Plan 2018-2038 (CSP) was adopted by Council in June 2018.

The CSP sets out a 20 year plan that outlines a strategic vision for the community derived from an extensive community engagement process. The strategic vision is supported by six goals: 'fair', 'accessible', 'welcoming', 'green', 'thriving' and 'innovative', for Council to facilitate via strategic actions in partnership with the community, government agencies and business. Notably, the goal 'fair' includes the following strategic action:

'Plan and advocate for quality housing options, including affordable housing that support the needs of our diverse community through all life stages.'

The proposed development for 16 seniors living units is not in conflict with the CSP as it will contribute to the provision of new affordable housing within the LGA.

Local Strategic Planning Statement City Plan 2036

The Local Strategic Planning Statement City Plan 2036 (LSPS) which came into effect on 31 March 2020, sets out a 20-year land use planning vision for the Parramatta LGA.

The LSPS identifies 16 Planning Priorities for the LGA, focused around local planning, liveability, productivity and sustainability. Notably, Planning Priority 7 seeks to promote diverse housing options.

The proposed development is consistent with Planning Priority 7 as it contributes to the provision of a diversity of residential uses in the LGA with the provision of housing for seniors and people with a disability.

6.1.6 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 undertaken 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 section 108B 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
<p>108A – This Division applies to development for purposes of senior housing involving the erection of a building on land —</p> <p>(a) on which development for purposes of seniors housing is permitted with consent under another environmental planning instrument, or</p> <p>(b) in a prescribed zone</p> <p>108B - Seniors housing permitted without</p>	<p>The site is zoned R2 Low Density Residential pursuant to the PLEP 2011, under which seniors housing is permissible, with consent.</p>

<p>development consent</p> <p>(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-</p> <p>(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</p> <p>(b) will not result in a building with a height of more than 9.5 m, and</p> <p>(c) the development will result in more than 40 dwellings on the site.</p>	<p>Consideration of the standards is provided in Table 6 below.</p> <p>The proposed maximum building height is 7.6 metres.</p> <p>The development proposes the construction of 16 dwellings.</p>
<p>(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—</p> <p>(a) a reference in clause 16 to “this Policy” is taken to be a reference to this section, and</p> <p>(b) a reference in the clauses to a public authority is taken to be a reference to the Land and Housing Corporation.</p>	<p>Noted</p>
<p>108C – Requirements for carrying out residential development</p> <p>(1) Before carrying out development under this Division, the Land and Housing Corporation must—</p> <p>(a) request the council nominate a person or persons who must, in the council’s opinion, be notified of the development, and</p> <p>(b) give written notice of the intention to carry out the development to—</p> <p>(i) the council, and</p> <p>(ii) the person or persons nominated by the council, and</p> <p>(iii) the occupiers of adjoining land, and</p> <p>(c) take into account the responses to the notice that are received within 21 days after the notice is given, and</p> <p>(d) take into account the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i>, March 2004, published on the Department’s website, to the extent to which it is not inconsistent with this Division, and</p> <p>(d1) if the relevant authority is the Aboriginal Housing</p>	<p>Advice was sought from Council regarding additional persons or properties that should be notified of the development via an email sent to Council on 8/09/2021. Council provided a response advising it was satisfied with the neighbour notification map.</p> <p>A letter notifying City of Parramatta Council of the proposed development activity was sent by LAHC on 24 August 2022. Letters notifying landowners and occupiers of adjoining land of the proposed development activity were sent by LAHC on the same date. A letter notifying City of Parramatta Council of the proposed development activity was sent by LAHC on 19 July 2022. Letters notifying occupiers of adjoining land of the proposed development activity were sent by LAHC on the same date.</p> <p>Council responded to LAHC’s notification by letter dated 24 August 2022. Comments on the response are provided in Section 7.1 of this REF. Submissions were received from 3 adjoining occupiers. Comments on the submissions are provided in Section 7.2 of this REF.</p> <p>Refer to checklist in Appendix M and section 6.1.6 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 section 6.1.4 of this REF. In these cases, suitable alternatives are proposed which are necessary due to site specific constraints.</p> <p>Not applicable.</p>

<p>Office—consider the relevant provisions of the <i>Aboriginal Housing Design Guidelines</i>, published by the Aboriginal Housing Office in January 2020, and</p> <p>(e) consider the <i>Good Design for Social Housing</i> and the <i>Land and Housing Corporation Dwelling Requirements</i>, September 2020, published on the website of the Land and Housing Corporation, to the extent to which it is not inconsistent with this Division, and</p> <p>(f) consider the design principles set out in Division 6 (i.e. Sections 99-104</p>	<p>Refer to section 6.1.8 and 6.1.9 and the Architect's Statement and Certificate of Building Design Compliance in Appendix O which indicate that the design and dwelling requirements have been considered.</p> <p>Consideration of these principles is discussed in Table 5 below.</p>
<p>(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.</p> <p>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.</p> <p>108E – Subdivision of seniors housing not permitted- Development consent must not be granted for subdivision of seniors housing.</p>	<p>Noted</p> <p>Noted</p> <p>No subdivision is proposed.</p>

6.1.7 Seniors Living Policy: Urban Design Guidelines for Infill Development

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

- **2.16 Increase front, rear and/or side setbacks?**

Comment: The front and side setbacks comply with DCP requirements. The rear setback is non-compliant however, privacy and protection of amenity for the neighbour adjoining the rear boundary are protected as the units along the rear boundary are single storey and fencing and landscaping are provided. These factors provide visual and acoustic mitigation.

- **2.20 Use semi-pervious materials for driveways, paths and other paved areas?**

Comment: Semi-permeable materials have not been used in this instance to meet LAHC's accessibility, maintenance and durability requirements.

- **3.06 Setback upper levels behind the front building façade?**

Comment: The upper levels have not been setback behind the front building façade, however the development has been designed and articulated to ensure it is in context with the existing streetscape and the existing and likely future character of the area. Front decks on the upper levels are proposed to achieve this.

- **3.07 Where it is common practice in the streetscape, locating second storeys within the roof space and using dormer windows to match the appearance of the existing dwelling houses?**

Comment: This is generally not within the character of the local area, therefore is not proposed as part of the development.

• **3.27 Vary the driveway surface material to break it up into a series of smaller spaces?**

Comment: Visual delineation of the driveway surface is not considered necessary as the majority of the driveway is 3m in width with a landscape curtilage, ensuring the visual dominance and 'pull' of the driveway is adequately reduced.

• **3.29 Provide gates at the head of driveways to minimise visual 'pull' of the driveway?**

Comment: A gate would be out of character with the locality, creating the appearance of a gated community which is undesirable. Further, a gate on the common driveway would be difficult to manage and is not supported by the LAHC design standards.

• **5.30 Provide communal open space that is clearly and easily accessible to all residents and easy to maintain and includes shared facilities, such as seating and barbeques to permit resident interaction?**

Comment: No designated communal open space is provided, however a landscaped, centralised area of open space is provided, including two bench seats, providing opportunities for resident interaction.

6.1.8 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 4** below. Refer to Certificate of Compliance from the Architect in **Appendix O**.

Table 4: 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"> • The design provides accessible features to all ground floor units and provision to adapt to the tenants' changing needs over time. • All units are provided with generous private open space with attractive gardens predominantly planted with low maintenance native species that attract birds and require minimal watering. • Ample parking is provided and pedestrian movement throughout the site is accessible. • The design achieves a high BASIX/NatHERS score so provides appropriate thermal comfort year-round and solar panels are provided to reduce operating costs. • 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"> • The design has good streetscape appeal and is of comparable quality to private

Table 4: Good Design for Social Housing – Relevant Goals & Principles

Goals	Principles	Comment - Discussion on how the design responds to the principles:
		<p>developments in the immediate neighbourhood.</p> <ul style="list-style-type: none"> Materials to be used are high quality and low maintenance and will hold their appeal over time. The mixed unit sizing caters to diverse accommodation needs of tenants. Ample landscaping is provided, including deep soil zones to enable the establishment of gardens of significant size and variety that can be appreciated from both inside and outside the development.
Value	<ul style="list-style-type: none"> Whole of lifecycle approach Sustainability and resilience Make every dollar count 	<ul style="list-style-type: none"> The scheme incorporates sustainable features such as insulation, improved glazing, clothes lines, native planting, solar panels, ceiling fans and a design that can be modified to accommodate the tenants changing needs. Durable materials have been chosen. The site is well utilized to attain a high yield whilst providing a comfortable place to live and age in place.

6.1.9 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 O**. Further detail will be incorporated in the construction documentation.

6.1.10 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 5** below demonstrates how the principles have been considered in the design of the proposal.

Table 5: Response to Design Principles (Part 5, Division 8)

<p>Neighbourhood amenity and streetscape [section 99]</p> <p>Seniors housing should be designed to—</p> <p>(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>(b) recognise the desirable elements of—</p> <p>(i) the location's current character, or</p> <p>(ii) for precincts undergoing a transition—the future character of the location so new</p>	<p>N/A</p> <p>The proposal incorporates low scale one and two storey residential development with an FSR of 0.46:1, which complies with the PLEP 2011 development standard of 0.5:1. The FSR using the LEP definition equates to 0.42:1.</p> <p>The proposal is generally compatible in form, scale and character with more contemporary residential development in the locality, which are indicative of likely future development (see examples at Figures 9 – 13 above). In addition, it is considered that the proposed development represents a reasonable balance between</p>
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<p>buildings contribute to the quality and identity of the area, and</p> <p>(c) complement heritage conservation areas and heritage items in the area, and</p> <p>(d) maintain reasonable neighbourhood amenity and appropriate residential character by—</p> <p>(i) providing building setbacks to reduce bulk and overshadowing, and</p> <p>(ii) using building form and siting that relates to the site's land form, and</p> <p>(iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and</p> <p>(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and</p> <p>(e) set back the front building on the site generally in line with the existing building line, and</p> <p>(f) include plants reasonably similar to other plants in the street, and</p> <p>(g) retain, wherever reasonable, significant trees, and</p> <p>(h) prevent the construction of a building in a riparian zone.</p>	<p>the optimal development potential of the site, the site constraints and the environmental considerations and also has the benefit of an additional 16 units for the local area.</p> <p>There are no items of heritage significance in proximity to the site that the design of the development would need to complement, noting that the NSOSS, an item of state heritage significance, would not impact the aesthetic design of the development given its location beneath the site.</p> <p>The building setbacks do not detract from the streetscape character of the locality and the side and front setbacks are consistent with Council's DCP requirements.</p> <p>A suitable balance of cut and fill, generally consistent with Council's codes, is proposed to address the access requirements of the SEPP.</p> <p>The street front buildings will be 2-storey with the bulk of the development broken up through the placement of the buildings on the site and side setbacks being provided in accordance with the DCP. The 2-storey form of the buildings is in keeping with the emerging character of the area.</p> <p>No buildings are proposed to be located on boundaries.</p> <p>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 requirements.</p> <p>Refer to the submitted Landscape Plan in Appendix D. The proposed high quality landscape design will enhance the appearance of the site and represents a positive outcome for the streetscape. Six semi-mature trees (45L size) will be planted to provide immediate softening of the appearance of the development. These will include a Red Head Lilly Pilly, Tuckeroo, Blueberry Ash, Native Frangipani, Pinnacle Lilly Pilly and Water Gum, all of which are native, evergreen trees, with mature heights from 6m to 12m.</p> <p>Within the site, 2 trees are to be retained and 5 trees are to be removed and replaced by more suitable landscaping, in accordance with the recommendations of the Arboricultural Impact Assessment report.</p> <p>The site is not located within or adjacent to a riparian zone.</p>
<p>Visual and acoustic privacy [section 100]</p> <p>Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and residents by—</p> <p>(a) using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and</p> <p>(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.</p>	<p>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 rear and front boundaries adjacent to the car park and the Glenn Ave frontage respectively.</p>

	<p>Boundary fencing to a height of 1.8m will assist with mitigation of visual and acoustic impacts associated with the development, including the internal hard stand car parking. Perimeter landscaping will also act as a visual and acoustic buffer between the development and adjacent properties.</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 open space areas will maximise solar access. Fourteen of the 16 units (87.5%) will receive a minimum of 2 hours sunlight between 9am and 3pm on June 21 to their living and private open space areas.</p> <p>Shadows to the neighbouring property to the south at No. 10 Glenn Ave will be largely confined to the afternoon period with only minimal impact generated prior to 12pm (refer to shadow diagrams at Appendix D).</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 rainwater tank (refer to the submitted stormwater drainage plans at Appendix D).</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 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>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 from all dwellings.</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>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>There are bus stops located approximately 63m and 83m from the site that have accessible gradients of path of travel (refer to the Long Section, Appendix E). Transdev operates regular bus services from these bus stops (Route 606) during weekdays and on weekends that would take residents to and from the necessary services and facilities in the Winston Hills and Parramatta town centres.</p> <p>However, the Access Report has identified a section of footpath north of the existing bus shelter that does not comply with the gradient requirements. Site specific identified requirement (No. 80) is recommended requiring LAHC to remedy sections of pathway to provide a continuous accessible path of travel, in accordance with the recommendations of the Access Report.</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>

6.1.11 General Requirements and Development Standards Applying to Seniors Housing

The Housing SEPP is very specific in terms of 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 development 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 is 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 in **Table 6** below:

Table 6: Minimum site size, site frontage and building height standards [section 84]		
Development Standard	Required	Proposed
Site size (sec 84(2))	At least 1,000m ²	2,813.7m ² , although not applicable to LAHC (cl 84(4)(a))
Site frontage (sec 84(2))	At least 20m	69.57m, 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 7.6m Single storey at rear.

Consideration of the development standards for accessibility set out in section 85 and Schedule 4 is demonstrated in **Table 7** 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 7: Development standards for hostels and independent living units [Clause 85 & Schedule 4]		
Development Standard	Required	Proposed
Siting Standards: (cl 2)		
Wheelchair access		
'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: (cl 3)		
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 (identified requirement No. 78).
Letterboxes: (cl 4)	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).	An accessible path of travel is provided between the letterboxes located at the site entrance on Glenn Avenue, to the unit entrances at ground floor level in accordance with AS1428.1.
Private car accommodation: (cl 5)		
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.	Four accessible car parking spaces are provided.
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): (cl 6)	Must comply with clauses 4.3.1 and 4.3.2 of AS 4299.	Adequate circulation is provided at entry doorways for compliance with AS1428.

Table 7: Development standards for hostels and independent living units [Clause 85 & Schedule 4]		
Development Standard	Required	Proposed
Garbage: (cl 21)	To be provided in accessible location.	Two accessible garbage storage areas are provided at the northern and southern ends of the site, within the frontage onto Glenn Ave.

Consideration of the specific development standards for useability set out in Schedule 4 of the Housing SEPP, i.e. the standards for internal design and fittings, is outlined in **Table 8** 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 8: Internal design and fittings standards [Schedule 4]		
Development Standard	Required	Proposed
Interior: general (cl 7)	<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>All doorways within the unit types meet the circulation requirements of AS1428.1.</p> <p>All corridors within meet the required width of 1000mm minimum.</p> <p>Circulation spaces will be required to comply (refer to identified requirement No. 76).</p>
Bedroom: (cl 8)	<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> <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 <p>(b) a clear area for the bed of at least:</p> <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 <p>(c) 2 double general power outlets on the wall where the head of the bed is likely to be, and</p> <p>(d) at least one general power outlet on the wall opposite the wall where the head of the bed is likely to be, and</p>	<p>The main bedroom within each unit type offers adequate circulation area as shown on drawings at Appendix D.</p> <p>Power, lighting and telephone outlets will be addressed at the detailed design stage.</p> <p>Will be required to comply (refer to identified requirement No 76).</p>

Table 8: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Proposed
	<p>(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</p> <p>(f) wiring to allow a potential illumination level of at least 300 lux</p>	<p>Will be required to comply (refer to identified requirement No 76).</p> <p>Will be required to comply (refer to identified requirement No 76).</p>
Bathroom: (cl 9)	<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> <p>(a) a slip-resistant floor surface,</p> <p>(b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1,</p> <p>(c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future:</p> <ul style="list-style-type: none"> (i) a grab rail, (ii) portable shower head, (iii) folding seat, <p>(d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it,</p> <p>(e) a double general power outlet beside the mirror</p> <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. 76).</p> <p>Will be required to comply (refer to identified requirement No. 76).</p> <p>Will be required to comply (refer to identified requirement No. 76).</p> <p>Will be required to comply (refer to identified requirement No. 76).</p> <p>Will be required to comply (refer to identified requirement No. 76).</p>
Toilet: (cl 10)	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 of AS 4299	All ground floor dwellings will be provided with a visitable toilet within the combined bathroom / laundry that complies with AS 4299.
Surface finishes: (cl 11)	Balconies and external paved areas must have slip-resistant surfaces	Will be required to comply (refer to identified requirement No. 76).
Door hardware: (cl 12)	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. 76).
Ancillary items: (cl 13)	Switches and power points must be provided in accordance with AS 4299	Will be required to comply (refer to identified requirement No 76).
Living room and dining room:		

Table 8: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Proposed
(cl 15)	<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>(c) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux</p>	<p>All ground floor dwellings will be provided with a living room that complies with AS 4299.</p> <p>Will be required to comply (refer to identified requirement No. 76).</p> <p>Will be required to comply (refer to identified requirement No. 76).</p>
Kitchen: (cl 16)	<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 76).</p> <p>Will be required to comply (refer to identified requirement No 76).</p> <p>Will be required to comply (refer to identified requirement No 76).</p> <p>Will be required to comply (refer to identified requirement No 76).</p> <p>Will be required to comply (refer to identified requirement No 76).</p> <p>Will be required to comply (refer to identified requirement No 76).</p>
Access to kitchen, main bedroom, bathroom and toilet:	In a multi-storey self-contained dwelling, the kitchen, main bedroom,	Not applicable, as dwellings are not multi-storey.

Table 8: Internal design and fittings standards [Schedule 4]

Development Standard	Required	Proposed
(cl 17)	bathroom and toilet must be located on the entry level	
Laundry: (cl 19)	<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 clothesline provided in relation to the dwelling</p>	<p>All doorways within the unit types meet the circulation requirements of AS1428.1.</p> <p>Complies</p> <p>Complies</p> <p>Complies</p> <p>Will be required to comply (refer to identified requirement No 76).</p>
Storage for linen: (cl 20)	A self-contained dwelling must be provided with a linen storage in accordance with Clause 4.11.5 of AS 4299	The requirement for adjustable shelving is to be implemented during detailed design.

(ii) Site related requirements

The proposed development complies with section 93 of the Housing 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 not within 400m walking distance of the facilities and services listed in section 93(1) of the SEPP and therefore must be accessible to bus services that can take future residents to and from the required services.

There are bus stops located approximately 63m and 83m from the site. Transdev operates regular bus services from these bus stops (Route 606) during weekdays and on weekends that would take residents to and from the necessary services and facilities in the Winston Hills and Parramatta town centres.

An access consultant report (**Appendix H**) indicates that the overall gradient of the path of travel for a person in a wheelchair is adequate. However, the report identifies a section of footpath that does not comply with the gradient requirements. Identified requirement (No. 80) requires that the section of footpath identified in the Access Report be upgraded to provide a continuous accessible path of travel to and from the site to the nearest bus stops on Glenn Avenue. The Long Section survey is provided in **Appendix E**.

(iii) Non-discretionary Development Standards

The following table outlines the standards that cannot be used by councils to refuse development consent for self-contained dwellings as set out in section 108 of the SEPP.

Table 9: Standards that cannot be used for refusal for self-contained dwellings		
Development Standard	Required	Proposed
Building Height:	9.5m or less	Maximum height 7.6m
Density and Scale:	Floor Space Ratio 0.5:1 or less	0.42:1
Landscaped Area:	Minimum 35m ² per dwelling (16 x 35m ² = 560m ²)	1,034m ²
Deep Soil Zone:	Minimum 15% of area of site (15% x 2,813.7m ² = 422m ²) if practicable, at least 65% of the deep soil zone is located at the rear of the site 65% x 422 = 274m ² Minimum dimension 3m	454.8m ² or 18% 260.5m ² provided at rear of site 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	Fourteen of the 16 dwellings (87.5%) receive the required amount of solar access to their living and private open space areas between 9am and 3pm on June 21.
Private Open Space:	Ground level: Minimum 15m ² per dwelling One area minimum 3m x 3m, accessible from living area	Minimum 22m ² Minimum 3m x 3m
	Upper level/s: 1 bedroom: Minimum 6m ² Minimum dimensions 2m 2 or more bedrooms: Minimum 10 m ² Minimum dimensions 2m	Minimum 11m ² Minimum 2m Minimum 10m ² Minimum 2m
Car parking:	Minimum 1 car parking space for each 5 dwellings (LAHC concession) – 4 car parking spaces required	8 car parking spaces for 16 dwellings, including 4 accessible parking spaces.

6.1.12 Other State Environmental Planning Policies

Table 10 below outlines compliance and applicability with State and Environmental Planning Policies (SEPPs).

Table 10: 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 K).

Table 10: Compliance with other applicable State and Environmental Planning Policies

State Environmental Planning Policy	Applicability
SEPP (Transport and Infrastructure) 2021	The site is not located in close proximity to a State Classified Road nor is the proposed development defined as traffic generating development.
SEPP (Biodiversity and Conservation) 2021	Tree removal is proposed and is addressed within this REF.
SEPP (Resilience and Hazards) 2021	The site is located within a developed residential area of Northmead. The s10.7 planning certificates have not identified the site as potentially contaminated. Standard identified requirement No. 17 requires implementation of management measures in the event of contamination being found during construction works.

6.2 Local Planning Controls

6.2.1 Parramatta Local Environmental Plan 2011

The applicable environmental planning instrument for the site is *Parramatta Local Environmental Plan 2011* (PLEP 2011). The site is zoned R2 Low Density Residential under the provisions of PLEP 2011.

The proposed development is defined as 'seniors housing' under the LEP, which is a permissible use under the R2 zone.

Consideration of the relevant provisions/ development standards set out in PLEP 2011 is demonstrated in **Table 11** below.

**Table 11: Parramatta Local Environmental Plan 2011
Relevant Provisions / Development Standards for Seniors Housing**

Clause	Provision / Development Standard	Required	Proposed
4.3	Height of Buildings	(2) 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 metres).	Maximum building height measured in accordance with the LEP definition is 7.6 metres.
4.4	Floor Space Ratio	(2) 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 mapped as containing a maximum floor space ratio of 0.5:1 on the Floor Space Ratio Map.	Proposed FSR is 0.42:1 (calculated in accordance with the LEP definition).

6.2.2 Parramatta Development Control Plan 2011

Parramatta Development Control Plan 2011 (PDCP 2011) does not contain specific development controls for seniors housing. As such, the building setbacks and other controls for multi dwelling 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 12** below.

The general controls for all development set out in PDCP 2011 have generally been addressed in the various sections of this REF that address compliance with the provisions of the Housing SEPP.

Table 12: Parramatta Development Control Plan 2011 Relevant Provisions / Development Standards for Multi Dwelling Housing		
Provision / Development Control	Required	Provided
Building setbacks	Multi dwelling housing: Front setback: 5 – 7 metres or correspond with existing prevalent building setbacks or emerging setbacks. Side setback: 3m Rear setback: Minimum 15% of length of site. 15% x 45.42m = 6.81metres	Front: 6.67 metres – complies. 3 metres – complies. 4 metres – does not comply. Refer to justification beneath this table.

Rear setback

There is a minor 2.8 metre encroachment into the rear setback requirement of 6.8 metres. The non-compliance is considered acceptable given that there are no privacy impacts due to the building being single storey and finished floor levels approximately 500mm below existing ground levels at the boundary are proposed. A 1.8m high Colorbond fence and proposed plantings (20 x Hairpin Banksia (mature height 2-3m) and 12 x Moonlight Grevillea (mature height 4-5m)) at the rear boundary will mitigate any potential acoustic impacts from the private open space areas.

7. Notification, Consultation and Consideration of Responses

Copies of the notification letters sent to City of Parramatta Council and to the adjoining occupiers are provided in **Appendix B**, together with copies of all responses received.

7.1 Council Notification

In accordance with section 108C of the Housing SEPP, City of Parramatta Council was notified of the development by letter dated 19 July 2022 (refer to **Appendix B**). The notification response period formally closed on 12 August 2022. Council responded to the notification by letter dated 24 August 2022 which has been extracted below in **Table 13**. 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 13: Issues raised in Council's submission		
Topic	Council submission	LAHC Response
Built form, separation and privacy / overlooking	The buildings have a good breakup of massing, and the articulated facades reduce the impacts of development.	Noted
Setbacks	<p>Front setback is to be at least 6m and in line with prevailing existing street setbacks. A plan with context and dimensions should be submitted to confirm.</p> <p>The location of facilities in the front setback is to be minimised to maximise opportunities for tree planting and screening. Bin enclosure locations should be relooked at as they are currently in the front setback and in front of proposed houses. Walls, fences, and other structures in the front setback are to be minimised. Booster valves are to be carefully designed and located so they are not visually obtrusive and do not obstruct opportunities for planting large trees.</p> <p>Rear setback is to be minimum 15% of site length. Required setback is 6.6m but provided is only 4m. This is not supported.</p>	<p>The proposed setback of 6.67 metres is considered appropriate.</p> <p>The Block Analysis Plan (Appendix D) indicates that front setbacks along the eastern side of Glenn Avenue vary between approximately 3 and 6 metres.</p> <p>Amended plans have reduced the gas and water meter enclosure, with the area converted to an additional area of deep soil equating to approximately 12.5m². The combined bin and water/gas metre enclosure structure is screened by a combination of Red Hot Bottlebrush (mature height 1-1.5metres) and Gynea Lily (mature height 1.5 – 2metres).</p> <p>In addition, 5 x Blueberry Ash are proposed in the front setback area and 2 existing mature trees (T8 and T9), also in the front setback area are to be protected and retained.</p> <p>The majority of the rear setback is 4.9m, while the bedrooms of units 15 and 16 have a 4m setback. Privacy and protection of amenity for the neighbour adjoining the rear boundary are able to be protected as the units along the rear boundary are single storey only and fencing and landscaping are provided. These factors provide visual and acoustic mitigation.</p>

Building separation	<p>Separation between dwellings 16 and 11/12 is considered not adequate as it's only 6m and should be reconsidered.</p>	<p>The BCA Report (Appendix I) demonstrates compliance with the relevant requirements of the BCA in relation to building separation.</p> <p>As noted in Table 5 of this REF, the development is consistent with the design principles for visual and acoustic privacy set out in section 100 of the Housing SEPP.</p>
Building Height and FSR	<p>The permissible FSR under Housing SEPP is 0.5:1 and the proposed development appears to comply.</p> <p>Gross dwelling per hectare should be indicated and calculated, as should population density.</p> <p>The Housing SEPP 2021 permits 9.5m maximum height excluding servicing equipment on the roof of a building.</p>	<p>Noted.</p> <p>There is no prescribed minimum dwelling density applicable to the site. LAHC aims to optimise the number of dwellings in the development derived from the available FSR and the minimum dwelling size requirements specified for Seniors housing under the Housing SEPP, factoring amenity and site constraints.</p> <p>The gross dwelling density/ Hectare for this project is approx. 57dwellings. This was calculated on the 16 dwellings proposed and site area of approx. 0.28Ha.</p> <p>The anticipated population density is approximately 8,500people/km². Based on 24 residents occupying a site of 0.0028km².</p> <p>Given the small scale of development it is not considered appropriate to use either measures as reliable indicators of population density or to calculate additional impacts on the community</p> <p>Noted. The proposed development has a maximum building height of 7.6m.</p>
Existing subsurface heritage tunnel and zone of influence	<p>Units 7/8, 9/10 and 11/12 are located directly above a heritage sewer tunnel and within the zone of influence. It is recommended to avoid housing directly over the structure.</p>	<p>Part of the site is located above the Northern Suburbs Ocean Outfall Sewer (NSOOS) tunnel. A Feasibility Letter dated 4 November 2021 and obtained from Sydney Water (refer Appendix R), includes a diagram which indicates that the depth of the sewer underneath the site varies between 17.1 and 20.1m.</p> <p>Pursuant to section 57 of the <i>Heritage Act 1977</i>, LAHC consulted with Sydney Water by letter dated 7 September 2022 (Appendix B).</p>

		<p>Sydney Water – Environment and Heritage, responded by email dated 13 October 2022 (Appendix B) and noted that:</p> <p><i>‘...your proposed development / works are over the Northern Suburbs Ocean Outfall Sewer (NSOOS) that is listed as a heritage item by Sydney Water at the LOCAL level.</i></p> <p><i>Ensuring that the works do not impact the NSOOS there are no heritage constraints.’</i></p> <p>Identified requirement (No. 86) is recommended requiring a Specialist Engineering Assessment (SEA) to be undertaken and submitted to Sydney Water in accordance with the requirements set out in the Feasibility Letter to demonstrate there will be no adverse impact, or to nominate protection measures to prevent any adverse impact to Sydney Water assets.</p>
Solar access and cross ventilation	<p>The shadow diagrams show impacts of the development on the dwelling to the south of the site. The suggested site layout reconfiguration would help to solve this issue.</p> <p>Diagrams showing solar access and cross ventilation should be submitted to show the quality and amenity of the dwellings.</p>	<p>The property to the south of the site is impacted by minimal overshadowing up until noon at mid-winter. Refer to ‘Shadow Diagrams Mid Winter’ and ‘View from Sun Diagrams’ in Appendix D.</p> <p>The shadow diagrams (Appendix D) indicate that 14 of the 16 dwellings (87.5%) receive a minimum 2 hrs direct solar access between 9 am and 3 pm at mid-winter.</p> <p>The dwellings achieve an average 6.8 NatHERS thermal performance rating.</p>
Deep soil and internal landscape	<p>The development complies with the DCP in that at least 35m² landscaped area is provided per dwelling or at least 30% of site area.</p> <p>Deep soil area complies with requirement to be at least 15% of site area, however does not comply with at least 65% being located at rear of the site.</p> <p>Trees should be provided at a rate of 1/80m² of landscape area and capable of reaching a mature height of more than 13m. Trees capable of reaching more than 13m in height are not sufficiently provided.</p>	<p>Noted.</p> <p>Deep soil area provided is 454.8m² which exceeds the 422m² minimum requirement. The development standard in the Housing SEPP also requires 65% of the deep soil zone to be located at the rear, where practicable. The proposal provides for 260.5m² at the rear of the site, equating to a shortfall of 13.8m². Given the minor variation, the proposal is considered to achieve the intent of this development standard.</p> <p>The number of trees required by Council equates to 1034m² / 80 = 13 trees.</p>

		Twenty-two new trees with mature heights varying between 6 and 12 metres are proposed for the site. Larger trees have not been proposed as they would pose a maintenance issue for LAHC in the longer term.
Communal open space	At least 25% of site area should be provided as communal open space, contiguous with deep soil where possible and retaining as many existing trees as possible.	Formal communal open space is not provided as each dwelling is provided with a substantial private open space area. However, the plans have been amended to provide accessible bench seating within the centrally located common landscaped area.
Private open space	For a dwelling located on the ground floor of a multi-storey building, the development should provide at least 15m ² of private open space per dwelling, with minimum dimensions of 3m accessible from a ground floor living area. The open space needs to be accessible only by a continuous accessible path of travel if the dwelling itself is an accessible one – see Schedule 4, section 2 of the Housing SEPP 2021.	Each ground floor dwelling complies with these requirements, as shown on the architectural plans in Appendix D . In accordance with Schedule 4, section 2 of the Housing SEPP, all ground floor dwellings in the development are accessible via a continuous accessible path of travel from Glen Avenue. Each ground floor dwelling is provided with an accessible private open space area.
Public domain	A minimum 1.5m new footpath is to be constructed partly along the boundary to replace the existing footpath to accompany the removal of existing redundant driveways and construction of new kerb and footpath sections. Five new street trees should be planted at 8-10m centres along the length of the frontage on Glenn Ave in the verge to match the existing dominant large tree species along the street. Driveways are to have preferred width of maximum 6m. Details of the public domain landscape drawings should show the public domain including alignment drawings resolving all levels and showing proposed indicative public domain treatments as outlined in the Parramatta Public Domain Guidelines.	Identified requirement (No. 84) is recommended requiring a new 1.5m wide pathway to be constructed across the site frontage. Standard identified requirement (No. 18) requires LAHC to consult with Council in relation to tree plantings within the road reserve. The Traffic Impact Assessment (Appendix J) confirms that the design of the driveway complies with the relevant Australian Standards. Identified requirement (No. 85) is recommended requiring the preparation of detailed drawings, in accordance with the Parramatta Public Domain Guidelines, to be submitted to LAHC and a copy provided to Council.
Universal access	Comments are provided in addition to the issues identified in the Access Report by BCA Access.	

	<p>The accessible path from the carparking area to unit 1 is approximately 30m longer than the non-accessible pathway which could be identified as discriminatory.</p> <p>Low level thresholds should be provided at all doors accessing outdoor areas.</p> <p>The abutment of differing surfaces is to have a smooth transition.</p> <p>Equipment and furniture within the outdoor common and recreation areas will require accessible and inclusive features suitable for a person with a mobility and other impairments.</p>	<p>The Access Report confirms that access to the dwellings complies with the relevant parts of the BCA.</p> <p>Noted. The detailed design will be further reviewed by the Access consultant to ensure compliance with the relevant sections of Schedule 4 of the Housing SEPP; the <i>Disability (Access to Premises – Buildings) Standards 2010</i>; and the BCA.</p>
Building typology	<p>The building typology is not sympathetic to the surrounding character due to the length of the development along the eastern and western sides of the lot, the number of dwellings proposed and the surface parking at the rear.</p> <p>The proposed development will appear as four attached dwellings on the streetscape rather than the prevailing single dwelling character. Further design development is required to ensure that the development is complimentary to the existing character of the streetscape.</p> <p>The proposed 16 dwelling development is not compatible with the local planning controls for the area (R2 zone therefore 2 dwellings permitted in the zone).</p> <p>The provision of a hard stand car parking area at the rear of the site is uncharacteristic of the low density R2 zoned area. The car parking area also results in potential adverse acoustic impacts to adjoining properties and results in minimal deep soil areas at the rear of the site.</p>	<p>Seniors housing is permissible, with consent, in the R2 Low Density Residential zone under the PLEP2011 and under the Housing SEPP.</p> <p>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, including detailed design requirements that need to be considered.</p> <p>The proposed development complies with the development standards prescribed by the Housing SEPP for Seniors housing and is consistent with the design principles set out in Part 5, Division 6 of the Housing SEPP.</p> <p>The development also complies with all relevant development standards relating to the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i> (SLUDG) with the exception of the minor variations discussed in section 6.1.7 of this REF. In these cases, suitable alternatives are proposed which are necessary due to site specific constraints.</p> <p>Refer to the SLUDG checklist at Appendix M for more information about how the development responds to the detailed considerations of the SLUDG; and to section 6.1.10 of this REF for more details about how the proposal has responded to section 99 – Neighbourhood amenity and streetscape of the Housing SEPP.</p>

		<p>The provision of the hard stand car parking area at the rear of the site is consistent with the SLUDG, which requires car parking to be located behind the building line. A 3m wide strip of deep soil zone is proposed between the car court and the rear boundary fence, which will provide opportunity for substantial tree plantings (5 No. Red Head Lily Pily with mature height of 5-6m combined with shrubs and ground covers) which will soften the appearance of the driveway. The 1.8m high Colorbond fence at the rear boundary, together with proposed plantings will attenuate noise.</p>
Engineering / Stormwater	<p>The proposed location of the OSD tanks on the high side of the property is not supported. OSD should be relocated to the front of the site in the form of an above ground basin.</p> <p>If additional storage is required, OSD tank 2 should be relocated further downstream of the driveway to minimise bypass.</p> <p>The proposal appears to be located within the path of the natural runoff caused by the localised upstream catchment from the south east direction. The engineer should demonstrate that the water caused from the upstream catchment can be captured via a swale and pipe system and disposed separately without discharging in the proposed OSD system. Calculations for the upstream catchment and the proposed swale shall demonstrate that the proposed scale and pipe system have sufficient capacity for the 1% AEP storm event. However, if the upstream property incorporates OSD then the swale is not required.</p> <p>The stormwater plan shall include all proposed surface and invert levels of the pits on the site to ensure bypass is limited to 15%.</p>	<p>A comprehensive assessment of alternate locations for the OSD system was undertaken by ACOR Consultants, consulting stormwater engineers, on behalf of LAHC.</p> <p>In summary, relocating the OSD tank to within the front setback area would result in additional retaining structures within the front setback area and the loss of two significant trees (T8 and T9).</p> <p>In addition, the anticipated storage volume within the area suggested by Council is in the order of 38 cubic metres. The required storage volume is 133 cubic metres.</p> <p>It is considered that the proposed location of OSD tanks provides an appropriate response to the site constraints and meets the intent of the relevant controls and Upper Parramatta River Catchment Trust's requirements.</p> <p>With regard to the suggested relocation of Tank T2, the allowable bypass area of 15% is not exceeded, consequently there is no requirement to relocate the tank. Notwithstanding, relocation of Tank T2 towards the front boundary will result in the lowering of the tank invert and resulting in a submerged outlet.</p> <p>In relation to the upstream catchment flow, it is noted that the subject site is impacted by an upstream catchment of 2,363m². The 100 year ARI flow anticipated from this catchment is approximately 110 Litres per second.</p> <p>It is considered that a table drain across the rear boundary and a 225mm diameter pipe located along the northern boundary will resolve this</p>

	<p>Stormwater plans should incorporate WSUD and stormwater harvesting measures within the plans and submit a MUSIC model to council. Also provide cross-sectional and plan view details for all the proposed infrastructure and WSUD measures.</p>	<p>issue. The plans have been updated accordingly.</p> <p>Refer to Appendix B for the consultant engineer's detailed response to Council's comments.</p> <p>The stormwater plans have been updated to provide detailed WSUD and stormwater harvesting measures – refer to Appendix D.</p>
Tree removal	<p>No objection raised to removal of vegetation located within the site. The proposed landscape plan is considered satisfactory for the scale of development.</p> <p>Any OSD relocated to front of site is to be outside the recommended tree protection areas and is to be incorporated into the proposed bin bays in the first instance, or to have sufficient soil depth coverage to allow for shrub, ground cover or turf above.</p> <p>Appropriate street tree planting shall be incorporated in the final design.</p>	<p>Noted.</p> <p>As noted above under the heading 'Engineering / Stormwater', above, the OSD tanks have not been relocated to the front of the site due to the loss of storage volume and the visual impact of additional structures on the front setback area and the resulting loss of two existing trees (T8 and T9).</p> <p>Identified requirement no. 18 requires Council to be consulted with in relation to street tree planting.</p>
Traffic	<p>Sight line along the driveway into the carpark area is restricted due to a 90 degree bend where the access driveway turns in to the car park area. A convex mirror should be installed at the end of the driveway.</p>	<p>Identified requirement no. 83 requires a convex mirror to be installed at the end of the driveway where it turns into the car park, in consultation with the Traffic consultant.</p>
Waste	<p>The proposed Waste Management Plan (WMP) does not contain adequate details of the proposed waste infrastructure or management arrangements. An updated WMP should be prepared in accordance with Parramatta DCP 2011.</p>	<p>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.</p>

7.2 Notification of Occupiers of Adjoining Land and Other Persons

Pursuant to section 108C(1)(a) of the Housing SEPP, Council was requested to nominate any other persons who should, in their opinion, be notified of the development.

Advice was sought from Council regarding additional persons or property that should be notified of the development via an email dated 08 September 2021. Council provided an email response on 22 September 2021 noting that it was satisfied with the parties to be notified. Refer notification map below at **Figure 15**:

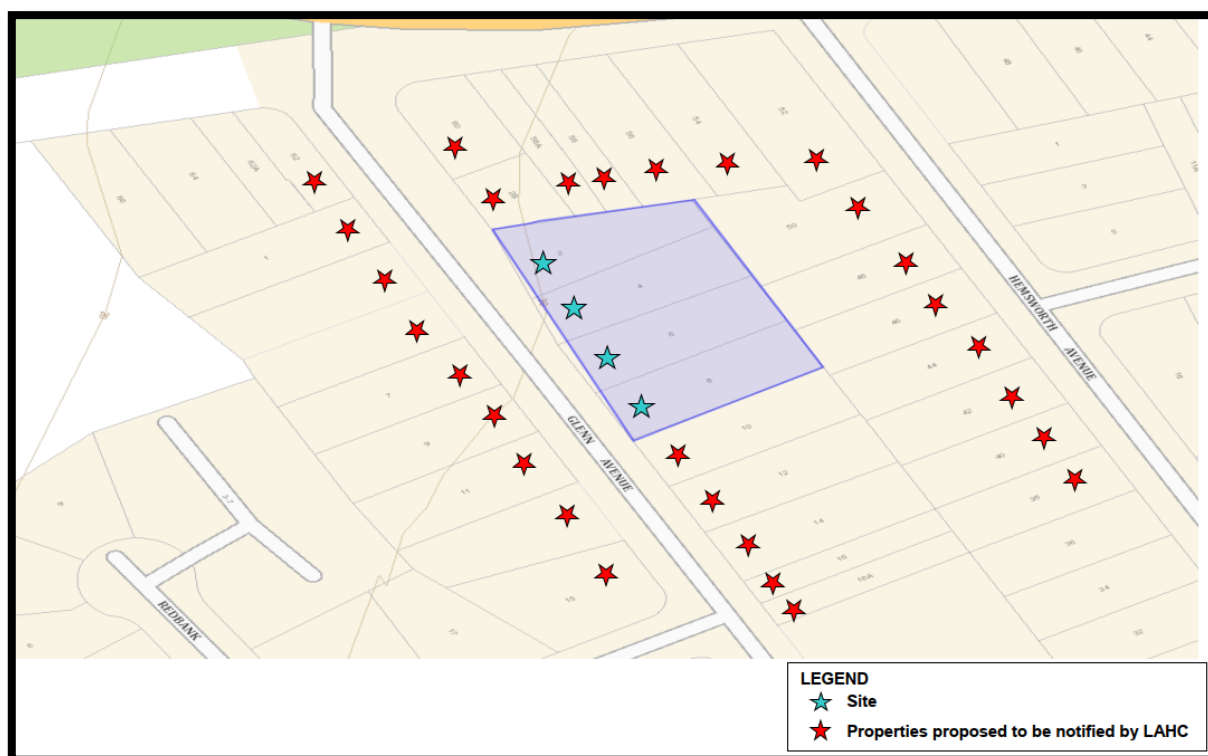


Figure 15: Map of Properties Notified of the Proposed Development
(Source: LAHC, 2022)

Under section 108C(1)(b) of the Housing SEPP, occupiers of adjoining land, as identified in the above map, were notified of the proposed development activity by letter dated 19 July 2022. Copies of the notification letters are provided at **Appendix B**.

The notification response period formally closed on 12 August 2022 and submissions are discussed in **Table 14**.

Table 14: Issues raised by adjoining owners / neighbours	
Issue	LAHC response
1. Concern regarding asbestos and demolition	Standard identified requirements (Nos 34-36, 45 and 49-53) are recommended to ensure demolition and asbestos handling and removal will be carried out in accordance with relevant standards and legislation.
2. Increased congestion/ lack of parking on Glenn Avenue	The proposed development provides 8 car parking spaces, which exceeds, by 4, the number of car parking spaces required for a development for senior housing under the Housing SEPP. A Traffic Impact Assessment (Appendix J) confirms that the development will not exceed the capacity of the surrounding street network.
3. Excessive noise (particularly in the construction phase)	Identified requirement (No. 62) is recommended to require any noise generated during the construction of the development not to exceed the limits specified in the July 2009 Interim Construction Noise Guidelines, published by the Department of Environment and Climate Change (now Department of Environment, Energy and Science).

	In addition, identified requirement (No. 60) requires standard construction hours to apply, being 7.00am to 5.00pm Monday to Saturday with no work permitted on Sundays or public holidays.
4. Roof colour to be a very light colour as its better for the environment to reflect heat.	Colorbond "Basalt" is being used for the roof colour. This is a mid-grey which is used for its recessive appearance and as it not a significant heat receptor.
5. Seeking permission to transplant one of the orange trees before they are removed.	LAHC has agreed to the transplant of one orange tree, subject to evidence being provided to LAHC of appropriate insurances.

7.3 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 other public authorities other than Council.

8. 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 6.1.3** 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.

8.1 Traffic & Parking

Surface car parking for 8 vehicles is proposed, including 4 accessible spaces. The amount of car parking proposed exceeds, by 4 spaces, the amount of car parking required for seniors housing under the Housing SEPP.

A Traffic and Parking Impact Assessment has been prepared by Apex Engineers (refer **Appendix J**). This assessment states that the projected net increase in traffic as a consequence of the proposed housing development is acceptable and any increase can be accommodated within the capacity of the existing local street network.

Based on AS 2890.1, the proposed access to the car parking area (off Glenn Avenue) is categorised under access category 1 (<25 car spaces, frontage road local). Therefore, the entry/exit combined access points should provide at least 3m in width. However, provision has been made at the driveway entry point (first 6m length) to accommodate two-way movements. This vehicle storage bay at the driveway entry point will ensure that the motorists entering the car park from Glenn Avenue can give way to another motorist exiting the car park, thus preventing vehicles queuing back to the frontage road.

Council, in its submission, raised concern that the sight line along the driveway into the carpark area is restricted due to a 90 degree bend where the access driveway turns in to the car park area and requested a convex mirror be installed at the end of the driveway. Council's concerns are noted and an identified requirement is recommended in this regard.

The development will not likely give rise to any significant traffic and parking impacts on the local road network.

Mitigation measures

Standard identified requirements (nos. 10-12) are included in **Appendix C** to ensure vehicular access and parking is provided in accordance with Council requirements and other relevant standards.

Identified requirement (No. 83) is recommended to require the installation of a convex mirror where the driveway turns into the car park.

8.2 Flora and Fauna

An Arboricultural Impact Assessment has been prepared for the site by Redgum Horticultural (**Appendix G**).

The report recommends the removal of 5 existing trees (Tree Nos. 2, 3, 4, 5 and 10) on 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. The report also recommends retention of 3 existing trees within the site (T8 and T9) and 1 in the road reserve (T7).

Tree Nos 7, 8 and 9, together with the 10 trees located on neighbouring properties are to be retained and protected through the implementation of adequate measures as set out in the Arboricultural Impact Assessment.

More appropriate replacement planting of tree species is 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, 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

Identified Requirements (no. 1, 18, 19, 20 and 44) are recommended to require the implementation of the Landscape Plan and tree protection measures as recommended in the arborist report and associated tree protection plan for trees identified for retention on the approved Landscape Plan and in the Arborist Report; and for LAHC to consult with Council in relation to any trees to be planted within the road reserve.

8.3 Heritage (European/ Indigenous)

No heritage items are identified on the sites in the Section 10.7(2) & (5) Planning Certificates and none are located on or in the vicinity of the sites as checked within PLEP 2011 heritage mapping, however, part of the site is located above the Northern Suburbs Ocean Outfall Sewer (NSOOS), an item of heritage significance listed on the Sydney Water S.170 heritage register.

European Heritage

The Northern Suburbs Ocean Outfall Sewer (NSOOS) tunnel, a heritage item listed on the Sydney Water section 170 heritage register traverses the site as shown on the survey in **Appendix E**.

Pursuant to section 57 of the *Heritage Act 1977*, LAHC consulted with Sydney Water by letter dated 7 September 2022.

Sydney Water – Environment and Heritage, responded by email dated 13 October 2022 and noted that:

‘...your proposed development / works are over the Northern Suburbs Ocean Outfall Sewer (NSOOS) that is listed as a heritage item by Sydney Water at the LOCAL level.

Ensuring that the works do not impact the NSOOS there are no heritage constraints.’

Mitigation Measures

Identified requirement (No. 86) is recommended requiring a Specialist Engineering Assessment (SEA) be undertaken and submitted to Sydney Water in accordance with the requirements set out in the Feasibility Letter dated 4 November 2021, prepared by Sydney Water, to demonstrate there will be no adverse impact, or to nominate protection measures to prevent any adverse impact to Sydney Water’s assets.

Aboriginal Heritage

An Aboriginal Heritage Information Management System (AHIMS) search, dated 15 November 2022 (**Appendix P**), 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 is warranted. Discovery of cultural material during development activities cannot be ruled out, however, identified requirement (no. 47) 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 City of Parramatta 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. 47) has been applied should any cultural heritage relics be discovered on the site during excavation / construction.

8.4 Soils / Contamination / Acid Sulfate Soils / Salinity

Geotechnical

A Geotechnical Investigation Report, prepared by STS Geotechnics Pty Ltd dated October 2020, states the following:

"The subsurface conditions generally consist of topsoil and fill overlying silty sandy clays, gravelly sandy clays, silty clays and weathered sandstone. Topsoil and fill were encountered to approximate depths of 0.2 to 0.6 metres. Natural silty sandy clays, gravelly sandy clays and silty clays underlie the topsoil and fill to approximate depths of 1.0 to 2.4 metres. The consistency of these materials range between firm to stiff and hard. Weathered sandstone bedrock underlies the natural soils to the auger refusal depths of 0.7 to 2.9 metres."

No groundwater was observed in the boreholes during the fieldwork.

Mitigation Measures

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

Contamination

Given the long-term continuous use of the land for residential purposes, the highly disturbed nature of the site and given that Council's Section 10.7(2) & (5) Planning Certificates indicate that the land is not affected by a policy restriction relating to contaminated land, it is unlikely that the subject land is affected by contamination.

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 Soils Map under the PLEP 2011.

Clause 6.1 of PLEP 2011 requires an Acid Sulfate Soils 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.

The site is not within 500m of Class 1-4 Land. Therefore, an Acid Sulfate Management Plan is not required.

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.

The Geotechnical Investigation Report (**Appendix F**) indicates that the site is consistent with the presence of non-saline soils.

Mitigation Measures

No mitigation measures are required.

8.5 Drainage / Flood Prone Land / Hydrology / Water Quality

Notwithstanding Council's submission, which is addressed in section 7.1 of this REF, stormwater drainage for the proposed development has been designed to achieve the intent of Council's policies and guidelines and the requirements of the Upper Parramatta River Catchment Trust's On-Site Stormwater Detention Handbook.

Generally, site stormwater will be collected via a series of stormwater pits and gutters on site. The stormwater drainage strategy incorporates 2 underground on-site detention tanks (107m³ and 40m³) under the carparking area and driveway to manage stormwater prior to discharge into the outlet pipe, which is then drained to an existing Council street pit. Roof water will be collected from downpipes and connected to an underground rainwater tank (12m³) located alongside on-site detention tank 1 for recycling of water (refer to the submitted Stormwater Plans at **Appendix D**).

The Section 10.7(2) & (5) Planning Certificates 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, 29 and 75) have been recommended to ensure that stormwater drainage is managed in accordance with legislative requirements.

8.6 Bushfire Prone Land

The Section 10.7(2) & (5) Planning Certificates issued by City of Parramatta Council for the site state the land is not bushfire prone.

Mitigation Measures

No mitigation measures are required.

8.7 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 Building Code of Australia* 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 (Nos. 2, 60 & 62) have been applied to ensure compliance with the above mitigation measures.

8.8 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. 66 and 67) have been applied that will satisfactorily mitigate any potential or adverse impacts on air quality.

8.9 Waste Minimisation

The following waste minimisation and management elements 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.

A Waste Management Plan has been prepared by Barry Rush & Associates Pty Ltd, dated 25 October 2021 (refer **Appendix N**).

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 crushed to be reused for filling, levelling or temporary road base;
- 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 should be recycled, as follows:

- bricks shall be crushed and reused for filling, levelling or temporary road base;
- 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 re-used on site, where possible, or mulched or sent to second hand suppliers;
- plasterboard shall be returned to the supplier for recycling; 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 residents 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 residents for collection by Council's waste services.

Mitigation Measures

Standard identified requirements (nos. 49-56) are recommended to ensure construction/demolition

waste is appropriately managed and disposed of.

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.

8.10 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.

8.11 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 Parramatta 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.

8.12 Economic Impact

The proposed development will contribute to a range of economic benefits in the Parramatta 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 tradespeople and other construction-related professionals;
- ongoing consumption from new/ additional households;
- the reduced maintenance costs of the newer housing; and
- savings associated with improved energy and water efficiency.

8.13 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.

9. Conclusion

9.1 Summary of Key Issues Raised in Assessment

The proposed activity, given its scale, location and design, will be sympathetic with the surrounding residential area. 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, it should be noted that 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 consistent with the relevant objectives and standards set out in the Housing SEPP, PLEP 2011, and the design principles and better practices set out in the relevant guidelines.

In addition, and as demonstrated by the environmental impact analysis and assessment undertaken in this REF, the proposed activity will have environmental impacts that can be mitigated to an acceptable level in accordance with current applicable standards. In addition, it will have 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 is clearly in the public interest.

9.2 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 (2) and (5) Planning Certificates

Appendix B Consultation and notification

Appendix C Identified requirements

Appendix D Development Plans

Appendix E Survey Plans

Appendix F Geotechnical Report

Appendix G Arboricultural Impact Assessment

Appendix H Access Report

Appendix I BCA Report

Appendix J Traffic Report

Appendix K BASIX and NatHERS Certificates

Appendix L Housing SEPP Design Compliance Table

Appendix M Seniors Living Policy: Urban Design Guidelines

Appendix N Waste Management Plan

Appendix O Design compliance checklists

Appendix P AHIMS Search

Appendix Q Deposited Plan and Title Searches

Appendix R Sydney Water