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REVIEW OF ENVIRONMENTAL FACTORS

Proposed Seniors Housing Development

at

289 – 293 Beauchamp Road, Matraville NSW 2036

March 2023





Acknowledgement of Country

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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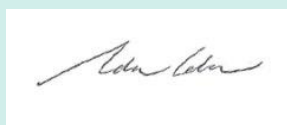
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2	20.02.2023	V2 (Final)	Updates in response to design changes following Council submission
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DOCUMENT SIGN-OFF


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1 Executive Summary

The subject site is located at 289 – 293 Beauchamp Road, Matraville, and is legally described as Lots 8 & 9 in Deposited Plan 36253.

The proposed seniors housing development is described as follows:

Demolition of existing dwellings and structures, removal of trees, and the construction of 10 independent living seniors housing units comprising 4 x 1-bedroom and 6 x 2-bedroom units, with associated landscaping and fencing, surface parking for 5 cars, and consolidation into a single lot.

The proposed activity is located in a prescribed zone, and seniors housing can therefore be carried out by the NSW Land and Housing Corporation (LAHC) without consent under the provisions of Part 5, Division 8 of *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 9.5m in height.

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

The removal of trees on the site is covered by the definition of consent under Section 6 of the Housing SEPP. It has therefore been incorporated in this review of environmental factors under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Part 8 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation).

The REF demonstrates the following:

- from an analysis of the potential environmental impacts associated with the proposed activity, it has been concluded that the preparation of an Environmental Impact Statement is not required;
- based on a review of the potential environmental impacts resulting from the proposed activity, it has been determined that, subject to implementation of mitigation measures to be incorporated as Identified Requirements, the activity will not have any significant adverse impact on the environment;
- the proposed activity will not have any effect on matters of national significance and its approval under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* is not required;
- the design of the proposed activity has adequately taken into account design principles and better practices set out in the Seniors Living Policy: Urban Design Guidelines for Infill Development and taken into consideration Good Design for Social Housing and LAHC's Dwelling Requirements;
- the site planning and design of the proposed activity adequately address the applicable local environmental planning and development controls of Randwick 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;
- 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; and
- Randwick City Council and occupiers of adjoining land were notified of the proposed activity under the provisions of Housing SEPP. A response was received from Council dated 18 December 2022. Comments on the response are provided in Section 6.1 of this REF. No submissions were received from owners or occupiers of adjoining land. Comments on the submissions are provided in Section 6.2 of this REF.

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

2 Introduction

This Review of Environmental Factors (REF) under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) is for an activity involving demolition of existing dwellings and structures, removal of trees, and the construction of 10 independent living seniors housing units comprising 4 x 1-bedroom and 6 x 2-bedroom units, with associated landscaping and fencing, surface parking for 5 cars, and consolidation into a single lot at 289 – 293 Beauchamp Road, Matraville.

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

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

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

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

2.1 Summary of Proposed Activity

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

Plans, Drawings & Supporting Document Details

The development is outlined in the following plans and drawings:

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date	Prepared by:
Architectural – Appendix E				
Cove Page	A-000	J	07.02.2023	Collard Maxwell Architects
Notes	A-001	B	21.02.2022	Collard Maxwell Architects
Site Analysis	A-002	C	01.11.2022	Collard Maxwell Architects
Site Amalgamation Plan	A-003	A	10.12.2021	Collard Maxwell Architects
Kerb Ramp Upgrade	A-004	A	03.11.2022	Collard Maxwell Architects
Site Plan	A-100	J	03.02.2023	Collard Maxwell Architects
Ground Floor Plan	A-101	K	03.02.2023	Collard Maxwell Architects
First Floor Plan	A-102	K	03.02.2023	Collard Maxwell Architects
Roof Plan	A-103	G	01.11.2022	Collard Maxwell Architects

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date	Prepared by:
Unit Layout Units 1 & 2	A-121	D	04.04.2022	Collard Maxwell Architects
Unit Layout Units 3 & 4	A-122	D	04.04.2022	Collard Maxwell Architects
Unit Layout Units 5 & 10	A-123	E	03.02.2023	Collard Maxwell Architects
Unit Layout Units 6 & 7	A-124	D	04.04.2022	Collard Maxwell Architects
Unit Layout Units 8 & 9	A-125	D	04.04.2022	Collard Maxwell Architects
Cut/Fill Plan, Demolition	A-151	F	01.11.2022	Collard Maxwell Architects
Elevations North/East	A-201	K	03.02.2023	Collard Maxwell Architects
Elevations South/West	A-202	K	03.02.2023	Collard Maxwell Architects
Sections A-A, B-B	A-301	G	04.04.2022	Collard Maxwell Architects
Shadow Diagrams	A-501	E	08.03.2022	Collard Maxwell Architects
Sun Angle Diagrams 9am-12pm	A-510	C	18.02.2022	Collard Maxwell Architects
Sun Angle Diagrams 1pm-3pm	A-511	C	18.02.2022	Collard Maxwell Architects
Perspectives	A-701	G	07.02.2023	Collard Maxwell Architects
Landscape Plan – Appendix R				
Landscape Plan	L - 01	F	10.02.2022	Eco Design
Engineering Plans – Appendix S				
Stormwater Services Legend, Details & Calculations	STW-00	B	03.12.2021	EI Australia
Stormwater Services Erosion Sediment Control Plan	STW-01	B	03.12.2021	EI Australia
Stormwater Services Ground Floor	STW-03	D	09.02.2022	EI Australia
Hydraulic Plans – Appendix T				
Drawing Schedule and Legend	H000	1	04/03/2022	Knox Advanced Engineering
Ground and First Floor Fire Hydrant Coverage	H101	1	04/03/2022	Knox Advanced Engineering
First Floor Plan – Drainage Services	H102	1	04/03/2022	Knox Advanced Engineering
First Floor Plan – Water and Gas Services	H201	1	04/03/2022	Knox Advanced Engineering
Ground Floor Plan – Water and Gas Services	H202	1	04/03/2022	Knox Advanced Engineering

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date	Prepared by:
Roof Level – Drainage Services	H301	1	04/03/2022	Knox Advanced Engineering
Hot & Cold Water Details	H401	1	04/03/2022	Knox Advanced Engineering
Notification Plans – Appendix B				
Cover Page	N01	C	08.03.2022	Collard Maxwell Architects
Site/Landscape Plan	N02	D	08.03.2022	Collard Maxwell Architects
Development Data	N03	E	04.04.2022	Collard Maxwell Architects
Elevations	N04	E	04.04.2022	Collard Maxwell Architects
Schedule of Finishes	N05	D	08.03.2022	Collard Maxwell Architects
Shadow Diagrams	N06	D	08.03.2022	Collard Maxwell Architects
Survey – Appendix P				
Detail and Level Survey	-	-	18.02.2021	SJ Surveying Services
Footpath Gradient	-	-	18.02.2021	SJ Surveying Services
Footpath Gradient	-	-	18.02.2021	SJ Surveying Services
Sustainability – Appendix H				
BASIX Certificate	1263679M_02	-	11.11.2022	Efficient Living Pty Ltd
NatHERS Certificate	No. 0006910400	-	11.11.2022	Efficient Living Pty Ltd
Specialist Reports				
Arborist's Impact Assessment and Tree Management Plan - Appendix F	7540	N/A	22.02.22	Redgum Horticultural
Access Report - Appendix G	21316	D	19.11.2022	Vista Access Architects
BCA Design Compliance Assessment - Appendix I	P210147	2	20.02.2022	BCA Vision
Flood Advice Letter – Appendix U	2-000279-LTR-CMA-2022-11-16	N/A	16.11.2022	Calibre
Noise Impact Assessment - Appendix J	210528	1	30.11.2021	PWNA
Geotechnical Investigation and Infiltration Testing- Appendix K	21/0520	N/A	March 2021	STS Geotechnics
NatHERS and BASIX Assessment – Appendix H	22-3942R	B	11/11/2022	Efficient Living
Traffic and Parking Impact Assessment- Appendix M	092/2021	F	November 2022	TTPA
Waste Management Plan – Appendix L	N/A	N/A	10.12. 2022	Collard Maxwell Architects

Design Compliance and Checklists – Appendix Q

Part 5 Activity Package Submission, Checklist for Development Proposals under the Housing SEPP, prepared by Sean Meyler dated 18.11.2022.

Architect's Certificate of Building Design Compliance – prepared by Collard Maxwell Architects dated 02.11.2022.

Certificate of Landscape Documentation Compliance – prepared by Ecodesign Pty Ltd dated 01.02.23,

Certificate of Civil Documentation Compliance – prepared by EI Australia dated 4.03.2022.

Certificate of Hydraulic Documentation Compliance – prepared by Knox Advanced Engineering dated 4.03.2022,

Seniors Living Urban Design Guidelines, LAHC Dwelling Requirements & Good Design for Social Housing – Appendix D

Housing for seniors checklist, prepared by Sean Meyer, dated 8 March 2023,

Section 10.7 Planning Certificates – Appendix A

Planning Certificate, Certificate No 5083881, 289 Beauchamp Road, Matraville– Issued by Randwick Council dated 19 October 2022.

Planning Certificate, Certificate No 5083882, 291-293 Beauchamp Road, Matraville– Issued by Randwick Council dated 19 October 2022.

Titles and Deposited Plans – Appendix O

Title Search, Folio: 9/36253, Search date 22/11/2022, First Schedule: New South Wales Land and Housing Corporation,

Title Search, Folio: 8/36253 Search date 22/11/2022 First Schedule: New South Wales Land and Housing Corporation. Second Schedule: AB229267 Lease to Eastern Suburbs Community Youth Association. Limited Expires: 31/7/2009.

Deposited Plan 36253, Search Date 25 February 2019,

LAHC Historical Layout Plan No. L1087/5 dated 18 August 1947,

AHIMS – Appendix N

AHIMS Search Result, 289 Beauchamp Road, Matraville – 1000m search buffer, date 10 January 2023,

2.2 Demolition

The proposed activity includes demolition of all existing structures on the site, as identified in the Cut/Fill, Demolition Plan (refer to **Appendix E**).

Refer to **Section 5.1.6** of this REF for further assessment of the proposed demolition works.

2.3 Removal of Trees

Four trees are located within the site, and the proposal includes the removal of 3 of those trees. Trees external to the site within the Beauchamp Road reserve and adjoining properties will be retained and protected.

The tree removal within the site boundaries is recommended primarily to accommodate the proposed development, or the individual species are recommended for removal as they are not considered to be high retention value (refer to submitted Arboricultural Impact Assessment and Tree Management Plan in **Appendix F**).

To compensate for the loss of these trees, the development will provide for 5 new canopy trees plus numerous screening plants and ground cover, comprising a total of 623 plants, which will provide for a superior landscaped outcome compared to the existing environment (refer to submitted Landscape Plan in **Appendix R**).

2.4 Proposed Dwellings

The proposed Seniors Housing development will deliver 10 independent living units, comprised of 6 x one bedroom and 4 x two bedroom dwellings, in 1 building. The 2 storey building presents as two distinct forms from the streetscape. A driveway on the eastern side of the site provides access to the rear communal car parking area.

The proposed development will provide accessible entrances to all 10 units and all units have been designed to meet the design requirements of Schedule 4 of the Housing SEPP.

The proposed housing represents a contemporary, high-quality design, and will replace the existing aging, not fit for purpose dwellings. The use of face brick for external walls and Colorbond metal roofing is consistent with the existing and developing character of the Matraville suburb. Six of the 10 proposed units will address the street (Units 1, 3 & 4 on the ground floor and Units 6, 8 & 9 on the first floor) with habitable rooms, living area windows and upper-level balconies facing the street for passive surveillance.

Minor cut and fill is proposed to provide a level building platform. Retaining walls below 1m high are proposed to assist with stability of the site as shown on the Site Plan and Cut/Fill Plans (refer to **Appendix E**).

A variety of new landscape plantings are proposed to offset the proposed tree removal and enhance the appearance of the site. New plantings will consist of a mixture of 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 5 surface car parking spaces will be provided on the site, including 2 accessible spaces.

Stormwater will be collected via a series of stormwater pits and gutters on the site connected to an underground stormwater absorption trench located in the rear setback under the at-grade parking spaces. Roof water will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground absorption trench.

Existing colorbond and paling fencing will be retained to the side and rear boundaries of the site. 1.5m high metal slatted privacy screen fencing is provided to the private open space areas of each ground floor. A combination of face brick and aluminium slatted fencing will be provided to Beauchamp Road. The front of the development is generally orientated to Beauchamp Road.

Figures 1 - 5 include extracts from the architectural plans illustrating the proposed development.

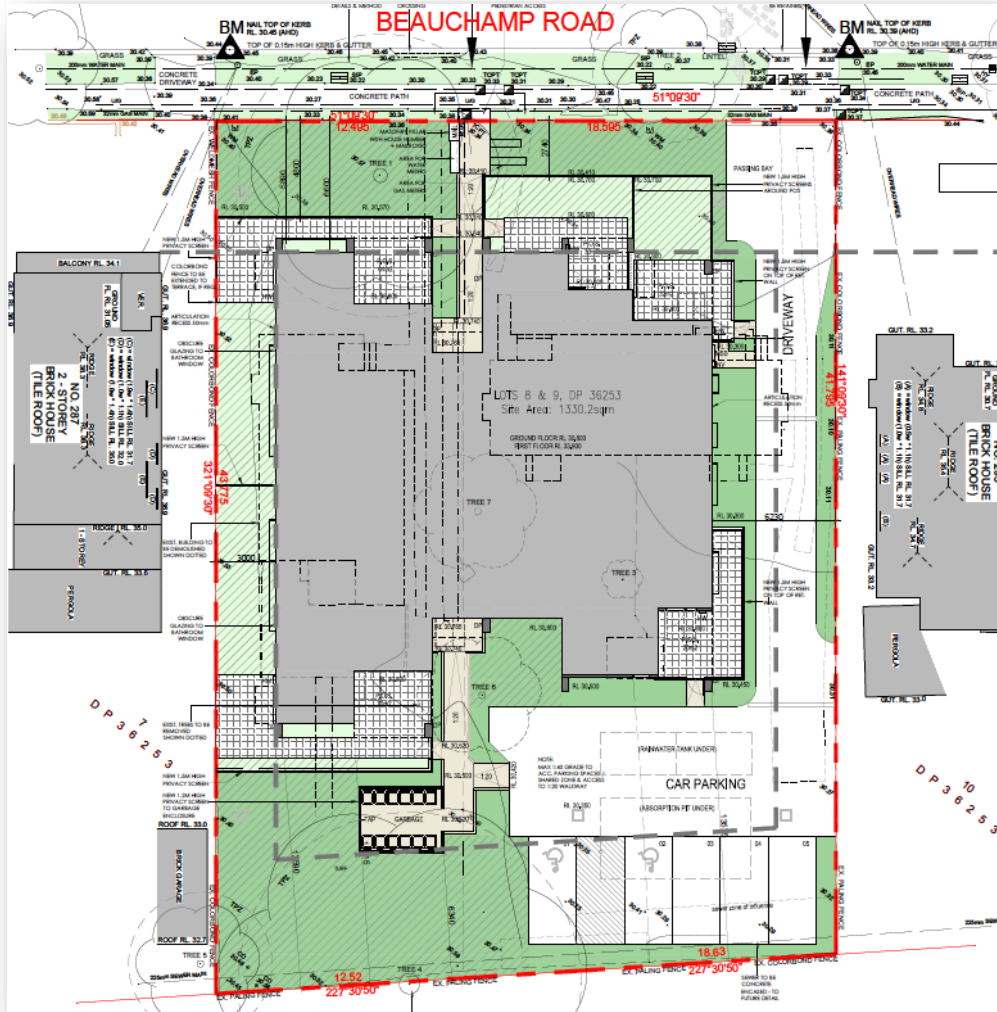


Figure 1 Extract from Architectural Plans – Site Plan
(Source: Architectural Plans, CMA, dated 03/02/2023)

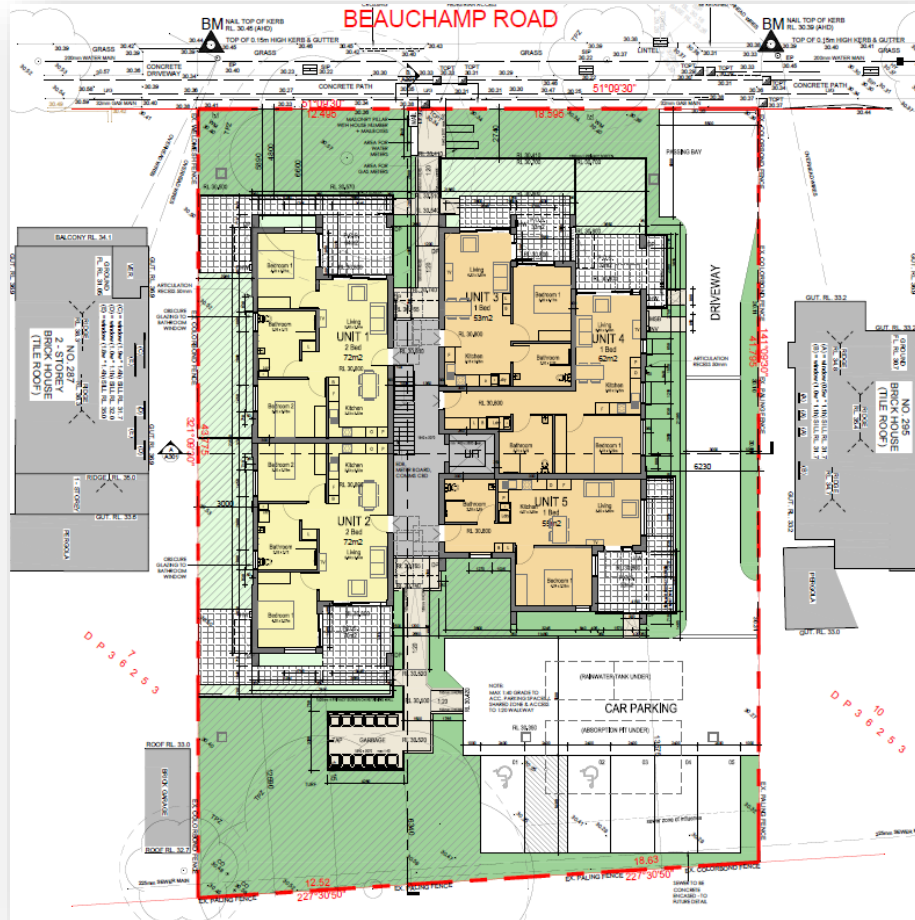


Figure 2 Extract from Architectural Plans - Ground Level
(Source: Architectural Plans, CMA, dated 03/02/2023)

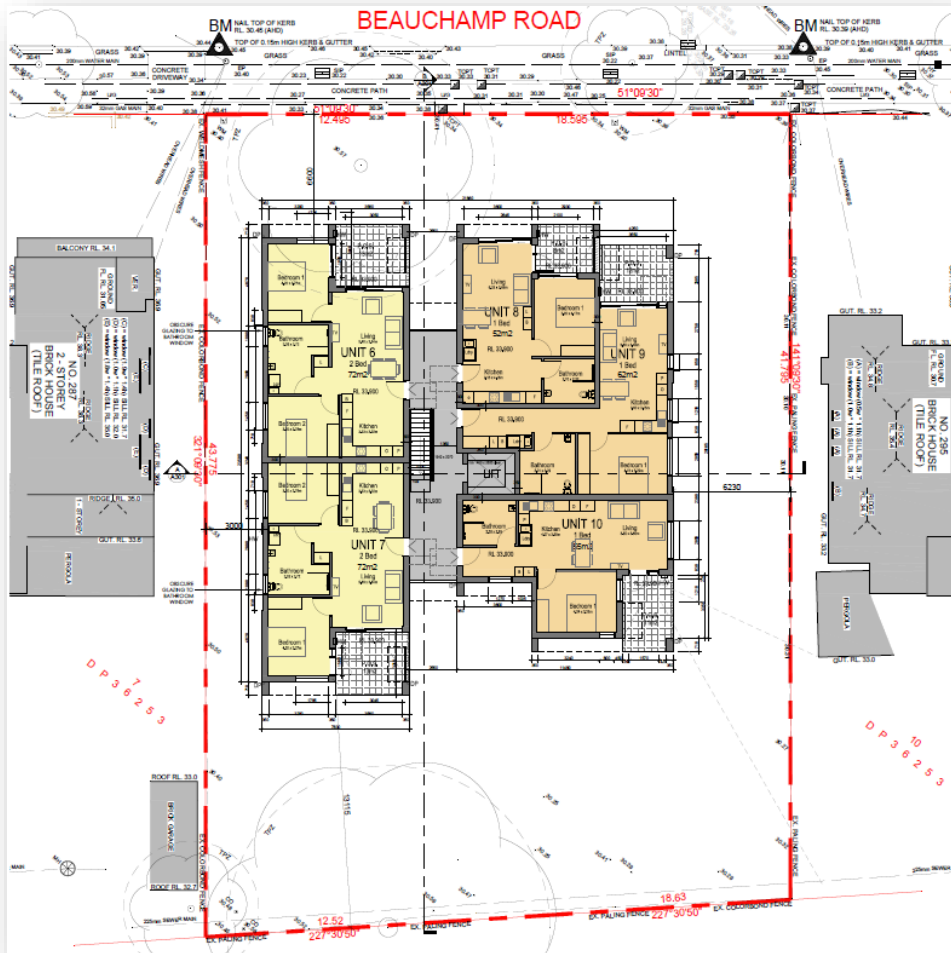


Figure 3 Extract from Architectural Plans – First Level
(Source: Architectural Plans, CMA, dated 03/02/2023)



Figure 4 Extract from Architectural Plans – Beauchamp Road Streetscape Perspective
(Source: Architectural Plans, CMA, dated 07/02/2023)

3 Existing Site & Locality

3.1 Existing Site and Immediately Adjoining Development

The site is located in the Randwick local government area (LGA) and comprises 2 residential allotments. A location plan is provided at **Figure 5**.

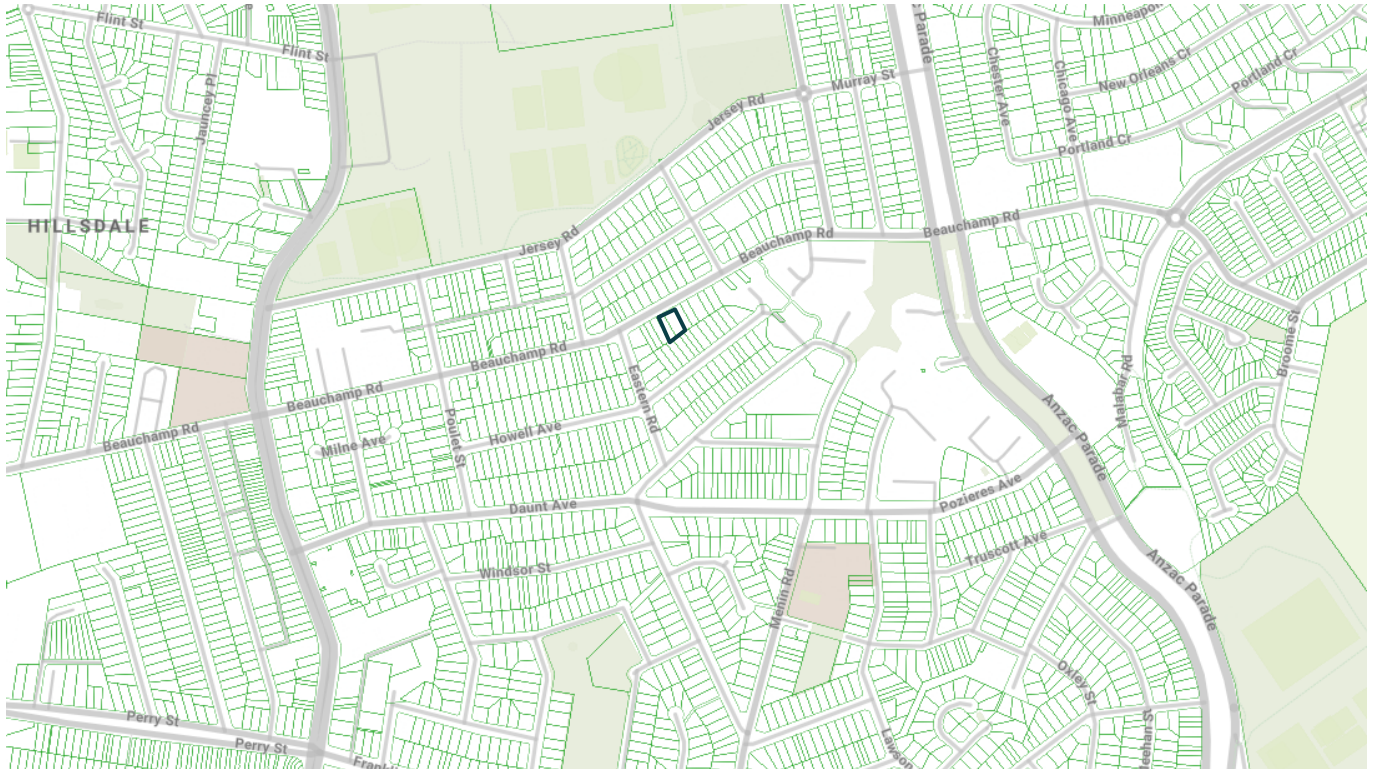


Figure 5 Location Plan
(Source: Mecone Mosaic)

The site is currently occupied by 2 single-storey brick dwellings with tiled roofs (refer to photographs below).



Figure 6 Development site – Looking southeast toward the site from Beauchamp Road
Source – Google maps

The property immediately to the east (295 Beauchamp Road) contains a single-storey brick dwelling house with tile roof (refer photograph at **Figure 7**). Further to the east is a double storey Seniors Housing development, similar in scale to the proposed development (refer photograph at **Figure 7**). The property to the west (287 Beauchamp Road) contains a double storey brick dwelling (refer to photograph at **Figure 8**).



Figure 7 Adjoining development - 295 & 297-301 Beauchamp Road viewed from the Beauchamp Road
(Source – Google maps)



Figure 8 287 Beauchamp Road viewed from Beauchamp Road
(Source – Google maps)

3.2 Site Description

Copies of the Section 10.7(2) & (5) Planning Certificates (Nos 63851 and 63852) dated 19 October 2022 are provided in **Appendix A**.

The site has a total area of 1,330.2m², a frontage to Beauchamp Road of 31.09m, a side (eastern) boundary of 41.795m, a side (western) boundary of 43.775m and a rear (southern) boundary of 31.15m (refer to the submitted Detail and Level Survey Plan in **Appendix P**).

The site falls slightly from the rear portion of the site in all directions by 50mm, with a low point in the north-eastern portion of the site. An easement for stormwater drainage is not required.

The site is within a flood planning area and is subject to flood related development controls.

There are 4 trees located within the site. One tree is located within the Beauchamp Road reserve. Two trees are located within adjoining properties in proximity to the side and rear boundaries of the site.

Water, sewer, electricity, gas and telephone facilities are available to the site (refer to the submitted Contour and Detail Plan for the location of available services at **Appendix P**). Water, electricity and telephone services are located along the road alignment of Beauchamp Road. Sewer is located along the rear boundary of the site.

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

3.3 Neighbouring Development and Locality

The site is located within an established residential area which is characterised by older style single-storey detached dwelling houses of brick construction with tiled roofs interspersed with more recent 2-storey dwelling houses, dual occupancy and multi-dwelling developments (refer to photographs at **Figure 9** and



Figure 10).



Figure 9 More recent 2-storey duplex development at 288-392 Beauchamp Road (north of the site)
(Source – Google maps)



Figure 10 More recent 2-storey multi-dwelling housing development at 297-301 Beauchamp Road (east of the site)
(Source – Google maps)

There are numerous bus stops located within proximity of the site. Two bus stops are located on Beauchamp Road approximately 15m and 266m walking distance opposite and west of the site (refer to the Long Section Surveys provided at **Appendix P**). These stops are serviced by Route 375, which connects Eastgardens to Randwick via Maroubra Beach, South Coogee and UNSW.

The area is close to open space uses, including Heffron Park, approximately 200m north of the site. Approximately 600m to the northeast of the site is the small town centre of Matraville along Bunnerong Road, which provides most day-to-day needs of residents.

4 Zoning and Permissibility

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

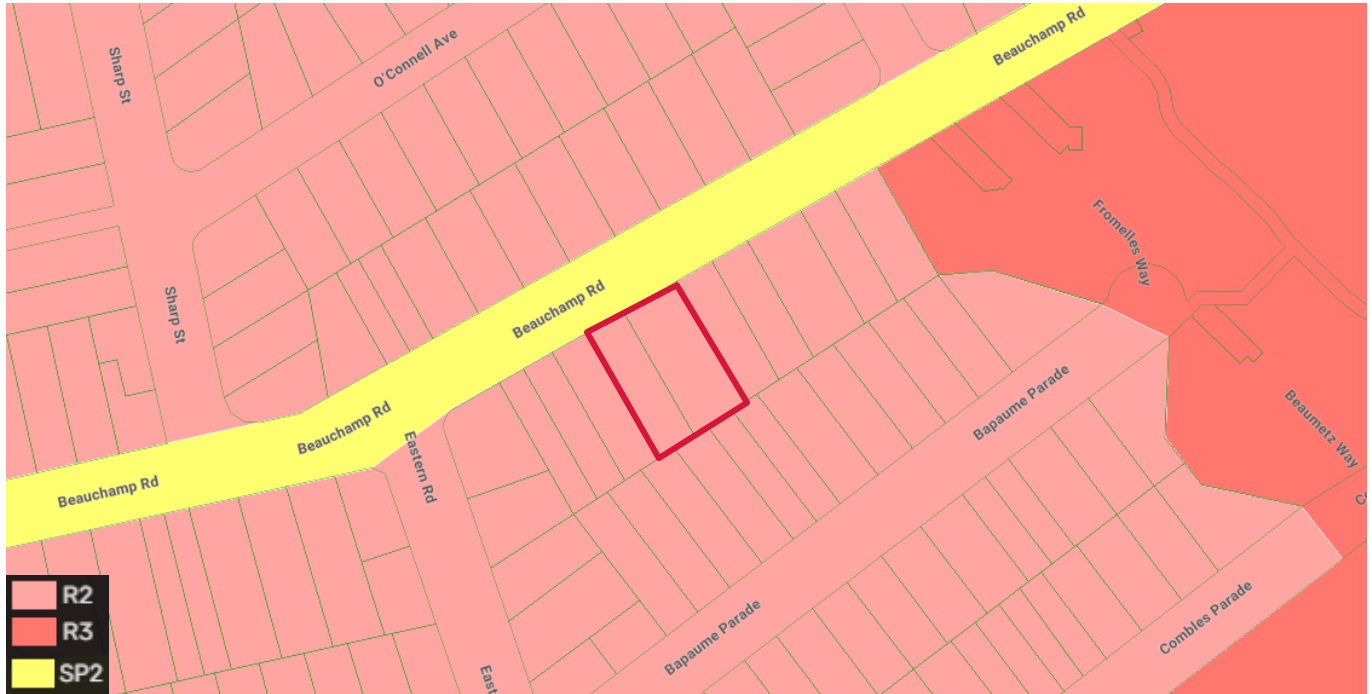


Figure 11 Land zoning map
(Source: Mecone Mosaic)

Nevertheless, the provisions of the Housing SEPP prevail where there is an inconsistency with another environmental planning instrument. Seniors housing is permitted with consent under section 81 of the Housing SEPP as the R2 zone is a prescribed zone under section 79 of the SEPP. The subject land is not excluded from the provisions of the Housing SEPP set out under section 80(1)(b).

The relevant objectives of the R2 zone, as set out in RLEP 2012, are:

- To provide for the housing needs of the community within a low density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To recognise the desirable elements of the existing streetscape and built form or, in precincts undergoing transition, that contribute to the desired future character of the area.
- To protect the amenity of residents.
- To encourage housing affordability.
- To enable small-scale business uses in existing commercial buildings.

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

Section 108B of the Housing SEPP permits seniors housing development to be carried out by LAHC as ‘development without consent’ subject to the provisions set out under that clause.

Table 3 in subsection 5.1.5 of this REF demonstrates compliance with the relevant provisions of section 108B of the SEPP.

5 Planning and Design Framework

5.1 State Legislation

5.1.1 Environmental Planning and Assessment Act 1979

Duty to consider environmental impact [Section 5.5]

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

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

Table 1 Compliance with subsection 3 of Section 5.5 of the EP&A Act 1979

Matters for consideration under sub-section 3 of Section 5.5 of the EP&A Act	
Matter for consideration	Effect of Activity
<p><i>Sub-section 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>

5.1.2 Biodiversity Conservation Act 2016 (BC Act)

Part 7 of the BC Act sets out the test for determining whether a proposed development or activity is likely to significantly affect 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 affect threatened species, ecological communities or their habitats, and therefore no further assessment is necessary. This is because the land does not contain threatened species, endangered ecological communities or constitute habitat of threatened species or ecological communities. The proposed activity will 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.

5.1.3 Other Acts

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

5.1.4 Environmental Planning and Assessment Regulation 2021

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

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

Table 2 Compliance with Section 171 of the EPA Regulations 2021

Table 2 Environmental Planning and Assessment Regulation 2021 Section 171

Factors to be taken into account concerning the impact of an activity on the environment.	Yes / No	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 2]	No			
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]	Yes	x	x	

Table 3a: Factors to be taken into account concerning the impact of an activity on the environment.

If there are no environmental factors guidelines in force have the following been taken into account:	YES/NO	Impact Assessment			
		Nil /NA	Temporary	Minor	Significant [Note 1]
(a) environmental impact on the community	Yes		x	x	
(b) transformation of a locality;	Yes			x	
(c) environmental impact on the ecosystems of the locality;	Yes	x			
(d) reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality;	Yes		x	x	
(e) effect on a locality, place or building having aesthetic, anthropological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations;	Yes	x			
(f) impact on the habitat of protected animals (within the meaning of Biodiversity Conservation Act 2016);	Yes	x			
(g) endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air;	Yes	x			
(h) long-term effects on the environment;	Yes			x	

Table 3a: Factors to be taken into account concerning the impact of an activity on the environment.

(i) degradation of the quality of the environment;	Yes		x	x	
(j) risk to the safety of the environment;	Yes		x	x	
(k) reduction in the range of beneficial uses of the environment;	Yes	x			
(l) pollution of the environment;	Yes		x	x	
(m) environmental problems associated with the disposal of waste;	Yes		x		
(n) increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply;	Yes			x	
(o) cumulative environmental effect with other existing or likely future activities.	Yes			x	
(p) impact on coastal processes and coastal hazards, including those under projected climate change conditions. [Note 3]	Yes	x			
(q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	Yes – discussed below in Section 6.1.5				
(r) other relevant environmental factors.	Yes	x			

Note 1: A 'significant' impact will trigger the need for an Environmental Impact Statement.

Note 2: This means the Department of Planning and Environment's Guidelines for Division 5.1 assessments (June 2022) in force under Section 171; not guidelines such as the Seniors Living Policy: Urban Design Guidelines for Infill Development that are in force under other legislation or instruments.

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

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

5.1.5 Strategic Planning Framework

Randwick 2040 Local Strategic Planning Statement

The Randwick Local Strategic Planning Statement was endorsed by Randwick Council in March 2020. It is a 20-year plan that identifies 23 Planning Priorities for the LGA, focused around infrastructure, collaboration, liveability, productivity and sustainability.

Notably, Priority 1 seeks to promote diverse housing options. The proposed development will be contributing 10 seniors' living units to the affordable housing supply in the Randwick LGA. It is diversifying the residential

uses in Randwick by introducing seniors living housing in a locality that is well serviced by existing public transport options.

The proposed development of 10 seniors living units contributes to the objectives of the Randwick Local Strategic Planning Statement, and will increase the provision of affordable and seniors living units.

Randwick 2032 Community Strategic Plan

The Randwick 2032 Community Strategic Plan was adopted by Council in May 2022. It is a 10-year plan that outlines 7 broad inter-related themes that are derived from an extensive community engagement process, which identified priorities for the community's future. These 7 key strategic directions are supported by key goals that will guide the Randwick area in the next 10 years. The themes are focused around environment, arts and culture, housing, integrated transport, open space and recreation, inclusion, and economic development. The proposed development for 10 seniors' living units is not in conflict with the Randwick 2032 Community Strategic Plan and will provide new affordable housing within the LGA.

5.1.6 State Environmental Planning Policy (Housing) 2021

Development without Consent

The proposed activity includes demolition of existing structures on the site. Section 42(2)(a) of the Housing SEPP permits LAHC to undertake demolition as "*development without consent*" provided the land the structures are located on is "*non-heritage land*" and is not "*identified in an environmental planning instrument as being within a heritage conservation area*". The subject site contains neither of these heritage notations and therefore demolition can be undertaken by LAHC as "*development without consent*". A waste management plan has been prepared which makes various recommendations and there are various Identified Requirements recommended in **Appendix C** which deal with site safety and environmental protection during demolition and construction works.

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

Table 3 Compliance with relevant provisions under sections Part 5, Division 8 of the SEPP for 'seniors housing development without consent' carried out by LAHC

Provision	Compliance
108A – Development to which Division applies This Division applies to development for purposes of senior housing involving the erection of a building on land -	
(a) on which development for purposes of seniors housing is permitted with consent under another environmental planning instrument, or	Not applicable.
(b) in a prescribed zone	The R2 zone is a prescribed zone under the SEPP. Part 5, Division 8 of the SEPP therefore applies.
108B – Seniors housing permitted without development consent (1) Development to which this Division applies may be carried out by or on behalf of the Land and Housing Corporation without development consent if -	

(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	Consideration of the development standards are provided in Tables 7-10 below.
(b) will not result in a building with a height of more than 9.5 m, and	The maximum building height is 8.4m.
(c) the development will result in more than 40 dwellings on the site.	The development is for 10 dwellings on the site.
(2) State Environmental Planning Policy (Transport and Infrastructure) 2021, sections 2.15 and 2.17 apply to the development and, in the application of the clauses –	Sections 2.15 and 2.17 of <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> is not applicable to the site or development.
(a) a reference in section 2.15 to “this Chapter” is taken to be a reference to this section, and	Noted.
(b) a reference in the sections to a public authority is taken to be a reference to the relevant authority.	Noted.
108C – Requirements for carrying out seniors housing (1) Before carrying out development to which this Division applies, a relevant authority must –	
(a) request the council to nominate a person or persons who must, in the council’s opinion, be notified of the development, and	Advice was sought from Randwick City Council regarding additional persons or properties that should be notified of the development via an email sent to Council on 28 October 2021. Council provided a response on 10 November 2021 advising that the scope of notification is to be expanded to include all properties within 40m of the site and should also include landowners in addition to the occupiers of the properties in accordance with Council’s Community Participation Plan.
(b) give written notice of the intention to carry out the development to – (i) the council, and (ii) the person or persons nominated by the council, and (iii) the occupiers of adjoining land, and	A letter notifying Randwick City Council of the proposed development activity was sent by LAHC on 24 November 2022. Letters notifying landowners and occupiers of land within 40m of the proposed development activity were sent by LAHC on the same date. Correspondence from Randwick City Council and LAHC, dated 07.03.23, confirmed owners details remain current.
(c) take into account the responses to the notice that are received within 21 days after the notice is given, and	Council responded to LAHC’s notification by letter dated 18 December 2022. Comments on the response are provided in Section 6.1 of this REF. One submission was received in response to this notification, refer to Section 6.2 .
(d) take into account the relevant provisions of the Seniors Living Policy: Urban Design Guidelines for Infill Development, published by the Department in March 2004, and	Refer to checklist in Appendix D and subsection 6.1.5 of this REF. These conclude that the development complies with all relevant development standards relating to the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i> with the exception of the minor variations discussed in subsection 5.1.6 of this report. In these cases, suitable alternatives are proposed which are necessary due to site-specific constraints.
(d1) if the relevant authority is the Aboriginal Housing Office – consider the relevant provisions of the Aboriginal Housing Design Guidelines, published by the Aboriginal Housing Office in January 2020, and	Not applicable.

(e) if the relevant authority is the Land and Housing Corporation – consider the relevant provisions of – (i) Good Design for Social Housing, published by the Land and Housing Corporation in September 2020, and (ii) Land and Housing Corporation Dwelling Requirements, published by the Land and Housing Corporation in September 2020, and	Refer to section 5.1.6 and 5.1.7 and the Architect's Statement and Certificate of Building Design Compliance in Appendix Q , which indicate that the design and dwelling requirements have been considered
(f) consider the design principles set out in Division 6	Consideration of these principles is discussed in Table 4 .
(2) In this section, a reference to the council is a reference to the council for the land on which the development is proposed to be located.	Noted.
108D - Exempt development Development for purposes of landscaping and gardening is exempt development if it is carried out by or on behalf of the Land and Housing Corporation in relation to seniors housing	Noted
108E - Subdivision of seniors housing not permitted Development consent must not be granted for subdivision of seniors housing.	No subdivision proposed.

5.1.7 Seniors Living Policy: Urban Design Guidelines for Infill Development

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

Table 4 Seniors Living Urban Design Guidelines departures

Guideline Requirement	Response
2.20 Use semi-pervious materials for driveways, paths and other paved areas?	Semi-pervious materials are not recommended for Seniors Living. However, paving has been minimised on the site.
3.06 Setback upper levels behind the front building façade?	Upper levels are not setback further than the front building façade. This is consistent with the existing streetscape character, which features a number of 2-storey dwellings with no upper-level setback (287 Beauchamp Road and 301 Beauchamp Road). A mix of materials and finishes allow for a varied façade that works well within the streetscape.

5.1.8 Good Design for Social Housing

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

Table 5 Good Design for Social Housing – Relevant Goals & Principles

Goals	Principles	Comment - Discussion on how the design responds to the principles:
<i>Wellbeing</i>	Healthy environments Good for tenants Quality homes	Safe access is provided from the car park to entries of the building. The units have been designed to ensure residents have privacy and feel safe. The development complies with BASIX requirements (Appendix H). The proposal includes high quality landscaping and outdoor areas to enhance the site amenity for residents and the streetscape.
<i>Belonging</i>	Mixed tenure Good shared and public spaces Contribute to local character	Front entrances are easily identified from the streetscape. Attractively designed landscaping has been located along street frontage. The development is low-density in scale which minimises apparent bulk and scale. The building design and landscaping integrates with the surrounding residential neighbourhood.
<i>Value</i>	Whole of lifecycle approach Sustainability and resilience Make every dollar count	Low-maintenance landscape species and durable building materials have been selected. The orientation of each dwelling and private open space area has been designed to optimise natural light to these areas. An underground rainwater tank is provided for the development to assist with sustainability and on-site water retention. Development meets BASIX requirements for building sustainability. Collaboration and consultation with key stakeholders was also incorporated at critical design milestones.
<i>Cooperation</i>	A good partner Place Making Continuous improvement	The proposal is of a scale and character that assists with place making, by ensuring integration with the surrounding development. Collaboration with a number of stakeholders has been undertaken during the design and assessment process, with the development shaped by input from a wide range of consultants and stakeholders.

5.1.9 Land and Housing Corporation Dwelling Requirements

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

5.1.10 Housing SEPP Design Principles

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

Table 6 Response to Design Principles (Part 5, Division 8)

Design Principle	Response
Neighbourhood amenity and streetscape [section 99] Seniors housing should be designed to – (a) recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, and	All units have been designed to be independent accessible units. However, care was taken to not design the building to look like a facility specifically for older people.
(b) recognise the desirable elements of – (i) the location's current character, or (ii) for precincts undergoing a transition – the future character of the location so new buildings contribute to the quality and identity of the area, and	The proposed design responds to the neighbourhood character, which is a mix of 1 and 2-storey brick buildings of various scales with some contemporary forms. The proposed 2-storey building has been designed with a contemporary form using traditional materials in non-traditional ways, e.g. bricks with large openings laid on the rake. It also has some bold forms and incorporates metal window surrounds and louvres, all contributing to a contemporary feel.
(c) complement heritage conservation areas and heritage items in the area, and	The site is not located within a heritage conservation area nor are there any heritage items within proximity of the site.
(d) maintain reasonable neighbourhood amenity and appropriate residential character by – (i) providing building setbacks to reduce bulk and overshadowing, and (ii) using building form and siting that relates to the site's land form, and (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and	The scale and bulk of the proposed building is consistent with the surrounding streetscape. The proposed building is articulated to the street and broken down into several smaller forms, presenting as 2 distinct buildings. The setbacks have been designed to follow the building pattern in the street and provide privacy to the subject and adjacent dwellings. Proposed building height is consistent with surrounding buildings.
(e) set back the front building on the site generally in line with the existing building line, and	The building line is consistent with the setbacks of dwelling houses in the locality.
(f) include plants reasonably similar to other plants in the street, and	Refer to the submitted Landscape Plan. The proposed high quality landscape design will enhance the appearance of the site and represents a positive outcome for the streetscape. Several semi mature trees are also proposed with mature heights of 5m to soften visual impact. Native species have been chosen to complement existing vegetation within the surrounding locality including flowering gum, bull bay magnolia and kanooka gum.

(g) retain, wherever reasonable, significant trees, and	The proposal shows a generous amount of planting in common and private open spaces to the front, sides and rear of the proposed building. Three large trees are able to be retained, the trees to be removed are mostly smaller.
(h) prevent the construction of a building in a riparian zone.	The site is not located within or adjacent to a riparian zone.
<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>(a) Impact onto neighbours has been minimised by locating private open space (POS) away from neighbours. Screens have been incorporated to the sides of balconies to prevent overlooking of adjacent private open spaces.</p> <p>(b) Good street setback and landscaping provides for separation from street noise for front facing units. Landscaped strips are provided to create a buffer along all paths, driveway and parking area.</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>(a) The proposed building has been designed to maximise direct sunlight access in midwinter. Eight of the 10 units (80%) will achieve at least 3 hours of solar access to their living areas and POS at midwinter. Shadow diagrams have been provided demonstrating minimal impact onto adjacent properties.</p> <p>(b) Good natural ventilation is provided to all units and cross-ventilation is maximised, where possible. With 6 of 10 units facing north, the number of dwelling with a northerly aspect has been maximised.</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>(a) Semi-pervious materials are not recommended for seniors living. Paving has however been minimised on the site with the amount of landscaped and deep soil areas significantly greater than required.</p> <p>(b) A 10,000L below-ground rainwater tank is proposed as well as a stormwater absorption trench (refer to the submitted stormwater drainage plans at Appendix S).</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</p>	<p>(a) CPTED principles have been considered and incorporated into the design. Paths are direct, clear and well-lit. Building entry is visible from the street.</p> <p>(b) Entry into the building is secure and single central foyer serves all residential units.</p> <p>(c) The main entry is clearly visible from the street, and 6 units face the street. Pedestrian entry is central on the site and directly off the footpath. Low fences are proposed to the front with a range of planting, allowing</p>

dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and
(ii) providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and
(iii) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.

surveillance of the street whilst providing filtered privacy.

Accessibility [section 104]

Seniors housing should –

- (a) have obvious and safe pedestrian links from the site that provide access to transport services or local facilities, and
- (b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.

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.

While technically not a consideration for LAHC the site related requirements contained within section 93 of the SEPP, which relates to the accessibility of the site to facilities and services such as shops and other retail/commercial services, community services recreation facilities and the practice of a general medical practitioner, have been considered.

The site is within 400m walking distance of a bus services that can take future residents to and from the required services. There are bus stops located approximately 15m and 266m from the site on Beauchamp Road that have accessible gradients of path of travel (see submitted Footpath Gradient Plan included at **Appendix P**). A regular bus service from this stop (Route 375) during weekdays and on weekends can take residents to and from the necessary facilities and services in Eastgardens and Mascot, in accordance with relevant requirements under Clause 93 and 104 of the Housing SEPP 2021.

An access consultant report indicates that the overall gradient of the path of travel for a person in a wheelchair is adequate. The report notes that a 'LIP' is shown on both sides of the crossing at Beauchamp Road as per the Footpath Gradient Plan. These crossings need to be via an AS1428.1 compliant kerb ramp on both sides of the street. Also, a section of -13.1% is provided which is 1:7.36 which is inconsistent with the SEPP. This area appears to be associated with a non-compliant kerb, and provision of an AS1428.1-compliant kerb ramp will resolve this non-compliance. The Footpath Gradient Plan including a longitudinal section to the bus stops is provided in **Appendix P**.

An Identified Requirement (No. 76) has been applied to ensure the kerbs are upgraded as required by the access report.

	Refer to the Access Report attached in Appendix G for confirmation.
Waste management [section 105] Seniors housing should include waste facilities that maximise recycling by the provision of appropriate facilities.	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.

5.1.11 General Requirements and Development Standards Applying to Seniors Housing

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

The proposed activity is located in an established urban area, and there are no known adverse natural environmental considerations affecting the subject land (including known significant environmental values, resources or hazards). The existing 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 the **Table 7** below:

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

Development Standard	Required	Comment
Site size (s.84(2))	At least 1,000m ²	1,330.2m ² , although not applicable to LAHC (cl.84(4)(a))
Site frontage (s.84(2))	At least 20m	31.09m, although not applicable to LAHC (cl.84(4)(a))
Height in zones where residential flat buildings are not permitted: height (s.84(2)(c))	9.5m or less	Max 8.4m
Buildings adjacent to rear site boundary (s.84(2)(c))	2 storeys	Max 2 storeys in height

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

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

Table 8 Accessibility and useability standards [Schedule 4]

Development Standard (Sch 4)	Required	Comment
2. Siting Standards:		
Note: consideration only required for ground floor units in accordance with clause 85(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 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 AS1428.1 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 AS1428.1.	All common areas have accessible paths of travel in accordance with AS1428.1.
3. Security:		
Pathway lighting	Pathway lighting to be designed and located to avoid glare for pedestrians and adjacent dwellings and to provide min 20 lux at ground level.	All lighting will be designed as per requirements at tender stage (subject to Identified Requirements).
4. Letterboxes		
	To be lockable, located in central location adjacent to street entry or in one or more central locations on a hard standing area and have wheelchair access and circulation by a continuous path of travel (as per AS1428.1).	Lockable letterboxes are proposed to be located at entry to site, accessible from AS1428.1 compliant hardstand area.
5. Private car accommodation		
Disabled car parking	Car parking spaces must comply with the requirements for parking for persons with a disability set out in AS2890 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.	2 accessible car parking spaces have been provided in accordance with these requirements.
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.

6. Accessible entry		
Accessible entry (every entry, whether front entry or not):	Must comply with clauses 4.3.1 and 4.3.2 of AS4299	Both front and rear entries have a roof over, a low threshold at the door and a landing with 1:50 fall. All unit entries are from the internal lobby.
21. Garbage		
	To be provided in accessible location	One bin storage area has been provided at the rear of the parking area. These areas are compliant with AS1428. A bin storage enclosure is proposed to be located to the rear of the proposed building. Paths have been designed to provide accessible pathways between the building entries, garbage storage area and car park.

Consideration of the specific development standards for useability set out in Schedule 4 of the SEPP, i.e. the standards for internal design and fittings, is outlined in **Table 9** below.

Table 9 Internal design and fittings standards [Schedule 4]

Development Standard	Required	Comment
7. Interior: general		
Note: consideration only required for ground floor units in accordance with clause 85(2)		
	<p>Internal doorways must have a minimum clear opening that complies with AS1428.1</p> <p>Internal corridors must have a minimum unobstructed width of 1,000mm</p> <p>Circulation space at approaches to internal doorways must comply with AS1428.1</p>	<p>Internal corridors and circulation at all doorways has been designed to comply with AS1428.1, circulation areas are shown on plans.</p> <p>Circulation spaces will be required to comply (refer to Identified Requirement No 72).</p>
8. Bedroom		
Note: consideration only required for ground floor units in accordance with clause 85(2)		
	<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> <p>(i) in the case of a dwelling in a hostel-a single - size bed,</p> <p>(ii) in the case of a self-contained dwelling - a queen size bed, and</p> <p>(b) a clear area for the bed of at least:</p> <p>(i) 1,200mm wide at the foot of the bed, and</p>	<p>Bed, wardrobe and circulation areas around the bed have been designed to comply and are shown with dimensions on the plans.</p> <p>Power outlets will be specified to comply with the requirements. Lighting will be specified to comply with or exceed required illumination levels.</p> <p>Bedrooms will be required to comply (refer to Identified Requirement No.72).</p>

- (ii) 1,000mm wide beside the bed between it and the wall, wardrobe or any other obstruction, and
- (c) 2 double general power outlets on the wall where the head of the bed is likely to be, and
- (d) at least 1 general power outlet on the wall opposite the wall where the head of the bed is likely to be, and
- (e) a telephone outlet next to the bed on the side closest to the door and a general power outlet beside the telephone outlet, and
- (f) wiring to allow a potential illumination level of at least 300 lux

9. Bathroom

Note: consideration only required for ground floor units in accordance with clause 85(2)

At least 1 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 AS1428.1:	All units in the development are on a single level and have one bathroom each. The bathrooms have been designed to comply with the requirements in AS1428.1.
(a) a slip-resistant floor surface,	Circulation spaces are shown on plans.
(b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS1428.1,	Slip-resistant flooring will be specified as required.
(c) a shower that complies with AS1428.1, except that the following must be accommodated either immediately or in the future:	Power outlets will be specified to comply with the requirements. Lighting will be specified to comply with the requirements.
<ul style="list-style-type: none"> (i) a grab rail, (ii) portable shower head, (iii) folding seat, (d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it, 	Will be required to comply (refer to Identified Requirement No.72).
(e) a double general power outlet beside the mirror	
The requirement under item (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility	

10. Toilet

Note: consideration only required for ground floor units in accordance with clause 85(2)

Toilet:	A dwelling must have at least 1 toilet on the ground (or main) floor and be a visitable toilet that complies with	All units in the development are single level and have one bathroom. The bathrooms have been designed
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	the requirements for sanitary facilities of AS4299	to comply with the requirements in AS4299. Circulation spaces are shown on plans.
11. Surface finishes Note: consideration only required for ground floor units in accordance with clause 85(2)		
	Balconies and external paved areas must have slip-resistant surfaces	Will be required to comply (refer to Identified Requirement No.72).
12.. Door Hardware Note: consideration only required for ground floor units in accordance with clause 85(2)		
	Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS4299	Will be required to comply (refer to Identified Requirement No.72).
13. Ancillary Items Note: consideration only required for ground floor units in accordance with clause 85(2)		
	Switches and power points must be provided in accordance with AS4299	Will be required to comply (refer to Identified Requirement No.72).
15. Living and dining room Note: consideration only required for ground floor units in accordance with clause 85(2)		
	<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 AS4299, and</p> <p>(b) a telephone adjacent to a general power outlet.</p> <p>A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux</p>	<p>All living rooms comply with circulation requirements.</p> <p>Will be required to comply (refer to Identified Requirement No.72).</p>
16. Kitchen Note: consideration only required for ground floor units in accordance with clause 85(2)		
	<p>A kitchen in a self-contained dwelling must have:</p> <p>(a) a circulation space in accordance with clause 4.5.2 of AS4299, 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 AS4299:</p> <p>(i) benches that include at least one work surface at least 800mm 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>The proposed kitchens have been designed to have a circulation space in accordance with AS4299.</p> <p>Circulation spaces are shown on the plans.</p> <p>Circulation at all doorways has been designed to comply with AS1428.1, circulation areas are shown on plans.</p> <p>Benches and required dimensions are shown on the plans. Tap set, cooktop, wall oven, all compliant with the relevant clauses in AS4299 are shown on the plans.</p> <p>D-pull cupboard handles will be specified as required.</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 300mm 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>Power outlets will be specified to comply with the requirements.</p> <p>Will be required to comply (refer to Identified Requirement No.72).</p>
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17. Access to kitchen, main bedroom, bathroom and toilet

Note: consideration only required for ground floor units in accordance with clause 85(2)

In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level	Not applicable, as dwellings are not multi-storey.
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18. Lifts in Multi storey buildings

Note: consideration only required for ground floor units in accordance with clause 85(2)

In a multi-storey building containing separate independent living units on different storeys, lift access must be provided to dwellings above the ground level of the building by way of a lift complying with clause E3.6 of the Building Code of Australia.	This project incorporates a lift.
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19. Laundry

Note: consideration only required for ground floor units in accordance with clause 85(2)

<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 1,300mm, and</p> <p>(d) a slip-resistant floor surface, and</p> <p>(e) an accessible path of travel to any clothes line provided in relation to the dwelling</p>	<p>The proposed laundries have been designed to:</p> <p>(a) have a circulation space in accordance with AS4299. Circulation spaces are shown on plans,</p> <p>(b) have space and provision for a washing machine and dryer (above) with a laundry tub beside it,</p> <p>(c) have a clear space of min 1300mm in front of the laundry,</p> <p>(d) have a floor compliant with the required slip-resistance</p> <p>(e) have an accessible path of travel to the clothes line on the terrace or balcony of the unit.</p> <p>Will be required to comply (refer to Identified Requirement No.72).</p>
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20. Storage for Linen

Note: consideration only required for ground floor units in accordance with clause 85(2)

A self-contained dwelling must be provided with a linen storage in accordance with Clause 4.11.5 of AS 4299	The proposed linen cupboards have been designed to AS4299 and are shown on the plans.
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(iii) Consideration of non-discretionary Development Standards

The following table outlines the non- discretionary standards that LAHC must consider.

Table 10 Consideration of non-discretionary standards for self-contained dwellings

Development Standard	Required	Comment
Building Height:	9.5m or less	Maximum height 8.4m
Density and Scale:	Floor Space Ratio 0.5:1 or less	Development's FSR is 0.56:1; however, non-compliance does not result in any adverse impacts on adjoining properties or the streetscape (refer discussion below).
Landscaped Area:	Minimum 35m ² per dwelling (10 x 35m ² = 350m ²)	445m ²
Deep Soil Zone:	Minimum 15% of area of site (15% x 1,330m ² = 199m ²)	341m ² or 25.6%
	Minimum 65% (129.7m ²) to be preferably located at rear of site	160m ² provided at rear of site
	Minimum dimension 3m	Minimum dimension 3m
Solar Access:	70% of living areas & main private open space to receive minimum 2 hours direct solar access between 9am and 3pm at mid-winter	80% of living areas and private open space (8 units) achieve 2 hours of direct solar access to private open space and living areas between 9am and 3pm mid-winter
Private Open Space:	Ground level:	
	Minimum 15m ² per dwelling	20 - 70m ² per dwelling
	One area minimum 3m x 3m, accessible from living area	Minimum 3m x 3m
	Upper level/s:	
	1 bedroom: Minimum 6m ² Minimum dimensions 2m	Minimum 8m ² Minimum dimension 3m
	2 or more bedrooms: Minimum 10m ² Minimum dimensions 2m	Minimum 13m ² Minimum 3m
Car parking:	Minimum 1 car parking space for each 5 dwellings (LAHC concession) – 2 car parking spaces required	5 car parking spaces for 10 dwellings, including 2 accessible parking spaces, plus one turning bay

Non-Compliance with FSR Standard

The development proposes a total gross floor area of 741m² calculated in accordance with the Housing SEPP definition. This translates to an FSR of 0.56:1 and represents an exceedance of 75.9m² to the 0.5:1 FSR development standard provided in section 108(2)(c) of the Housing SEPP.

The variation is acceptable as the proposed development is not incongruous in its surroundings. The design has implemented a range of measures as follows:

- articulation of building form to reflect the nature of existing 1- to 2-storey detached development within the locality;
- significant landscaping within the site to break up hard surfaces and building bulk;
- existing vegetation along the edges of the site including within adjoining properties and the road reserve are to be retained;
- materials and finishes including brick walls and sheet metal roofing are similar to the materials and finishes of existing recent development in the street with a variety of materials used for wall sheeting, balcony balustrades and external privacy screens to add visual interest to the development; and
- the development has been stepped along the frontages to minimise the bulk and scale of the development.

The above measures illustrate that the development has appropriately considered the context of the site and has been designed to complement its surroundings. The proposal exceeds the minimum landscaped area, private open space and deep soil requirements, which ensures the development makes a positive contribution to the streetscape and general locality.

The considered design and articulation of the streetscape elevation ensures the proposal presents at a similar scale to existing development in the immediate locality. The development will present similarly to existing multi-dwelling units at 301 Beauchamp Road, and the multiple duplexes opposite the site at 288-292 Beauchamp Road, Matraville. The large existing tree in the front setback will be retained, screening the development and integrating the new development into the landscape and landform of the locality.

The proposed development is unlikely to generate any significant adverse amenity impacts on surrounding properties in terms of overlooking or overshadowing due to its north/south orientation and considered design. Shadows to neighbouring development to the west (No.287 Beauchamp Road) will be confined to the morning period, with full solar access between 12pm and 3pm. No overshadowing will result to the adjoining properties to the south or east of the subject site.

The proposed development accommodates the variation to FSR without impacting front setback and building separation between adjacent developments. Whilst a minor side setback variation is proposed to the western elevation (No. 287 Beauchamp Road), as discussed above, this does not result in adverse overshadowing or privacy impacts. The variation is a result of the need to accommodate the access driveway to the rear parking area along the eastern side of the development, requiring a 6.2m setback, which is more than the 4m requirement. In addition, significant landscaping is proposed across the site and within the side setbacks, reducing perceived bulk and scale and screening the development to reduce overlooking. First-floor windows have also been limited to bedrooms and bathrooms, with the main living areas oriented to the rear of the site. Refer to **Section 5.2.2** for further justification of the side setback variation.

Notwithstanding the side setback non-compliance, the FSR variation is considered acceptable on balance as it is unlikely to result in adverse environmental impacts. A compliant FSR, that provides a compliant side setback, is considered unnecessary as it would reduce the delivery of social housing in the absence of adverse environmental impacts.

The development is consistent with the principles of the Housing SEPP in that it:

- contributes to the increase in supply of suitable accommodation for seniors;
- meets the current and future accommodation needs of Sydney's ageing population;
- provides seniors accommodation with an appropriate level of amenity;

- is well-located to public transport connections; and
- provides for a design that reflects and enhances the locality.

The proposed exceedance of the floor space ratio therefore has significant environmental benefits as the development increases the supply of seniors housing while positively contributing to the streetscape and surrounding area.

5.1.12 Other State Environmental Planning Policies

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

Table 11 Compliance with other applicable State and Environmental Planning Policies

State Environmental Planning Policy	Applicability
SEPP (Building Sustainability Index: BASIX) 2004	A BASIX Certificate has been obtained for the development proposal, as required under the SEPP (refer to Appendix H).
SEPP (Transport and Infrastructure) 2021	<p>The development is sensitive to traffic noise and vehicle emissions. However, it has been appropriately located and designed to ameliorate potential traffic noise and vehicle emissions within the site arising from Beauchamp Road. Refer to the specific design and construction measures outlined within the Acoustic Report (refer to Appendix M).</p> <p>The development is not traffic generating in accordance with section 2.122 and Schedule 3 of this SEPP. Those other aspects of <i>Chapter 2 Infrastructure</i>, including <i>Division 15 Railways</i> and <i>Division 5 Electricity transmission or distribution</i>, have been reviewed and not considered applicable, or requiring further consideration/assessment.</p>
SEPP (Biodiversity and Conservation) 2021	<p>Clause 2.6(1) of this SEPP requires a permit from Council for clearing of vegetation required under the policy.</p> <p>Notwithstanding, Clause 6 of Housing SEPP specifies that development permitted without consent may be carried out without another consent or a licence, permission, approval or authorisation otherwise required under another environmental planning instrument. This means the proposed removal of trees within the site can be included within the REF scope and does not require a permit from Council.</p>

SEPP (Resilience and Hazards) 2021

The site is located within a developed residential area of Matraville, which has a history of residential uses. LAHC historical layout plan No. L1087/5 (**Appendix O**) indicates that the area was being developed for residential purposes from as early as 1947. Given the long-term continuous use of the land for residential purposes, the highly disturbed nature of the site, and given that the Section 10.7 Planning Certificates (**Appendix A**) have not identified the site as being potentially contaminated, it is unlikely that the subject land is affected by contamination. A standard recommended Identified Requirement (No. 17) requires implementation of management measures in the event of contamination being discovered during construction works.

5.2 Local Planning Controls

5.2.1 Randwick Local Environmental Plan 2012 (RLEP 2012)

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

Table 12 Randwick Local Environmental Plan 2012

Relevant Provisions			
Clause	Provision / Development Standard	Required	Provided
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 (9.5 metres)	Maximum building height (measured in accordance with the LEP definition) is 8.4m.
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.	Proposed FSR is 0.55:1, a 64.9m ² or 9.75% variation. For justification regarding the development's FSR, refer to the FSR discussion at Section 5.1.11 of this REF.

5.2.2 Randwick Development Control Plan 2013

Neither the Draft Comprehensive Development Control Plan nor the Randwick Development Control Plan 2013 (RDCP 2013) contains specific development controls for seniors housing. As such, the building setbacks for multi-unit housing have been used for comparative purposes to demonstrate the suitability of the site for the proposed development as shown in **Table 13** below.

The general controls for all development set out in RDCP 2013 have generally been addressed in the various sections of this REF that address compliance with the provisions of the Housing SEPP.

Table 13 Randwick Development Control Plan 2005

Compliance with setback controls for multi-unit housing		
Multi-unit housing		
Clause	Requirement	Proposed
2.2 Density, Bulk and Scale Building Envelope	<u>Front setbacks</u> The front setback on the primary and secondary property frontages must be consistent with the prevailing setback line along the street. Notwithstanding the above, the front setback generally must be no less than 3m in all circumstances to allow for suitable landscaped areas to building entries.	6.6m setback to Beauchamp Road. The proposal is setback 6.6m from Beauchamp Road, consistent with the prevailing front setback of locality.
	<u>Side setbacks</u> Lot frontage 20m and above – 4m	The setback to the eastern side boundary is approximately 6.2m, in excess of the requirement. The western side boundary is setback 3m, 1m below the requirement. The variation is discussed in further detail below.
	<u>Rear setbacks</u> Minimum rear setback of 15% of allotment depth or 5m, whichever is the greater.	The 13.1m rear setback equates to 29% of the allotment depth of 43m, which easily meets the minimum requirement.

Non-Compliance with Side Setback Control

The development proposes a 3m setback to the western elevation, 1m less than the 4m development control contained within the RDCP 2013.

It should be noted that the RDCP does not provide controls specifically for Seniors Living; rather, the controls for 'Medium Density Residential' have been adopted per Section C2 of the DCP.

The variation is acceptable as the proposed development is not incongruous in its surroundings. The design has implemented a range of measures as follows:

- first-floor windows to the western elevation have been limited to bedrooms and bathrooms, with habitable rooms oriented towards the rear to minimise occurrence of overlooking;
- the windows have been sited to avoid direct overlooking with the existing windows of the adjoining dwelling at 287 Beauchamp Road;
- significant landscaping within the site to break up building bulk and reduce potential for overlooking;
- existing vegetation along the edges of the site including within adjoining properties and the road reserve are to be retained; and
- materials and finishes including brick walls and sheet metal roofing are similar to the materials and finishes of existing recent development in the locality with a variety of materials used for wall sheeting, balcony balustrades and external privacy screens to add visual interest to the development.

The above measures illustrate that the development has appropriately considered the context of the site and has been designed to ameliorate potential privacy and visual impacts. The proposal exceeds the minimum landscaped area, private open space and deep soil requirements, which ensures the overall bulk and scale of the development is acceptable.

The development has been designed to comply with *Seniors Living Policy: Urban design guidelines for infill development*. The policy does not provide numerical controls for side setbacks but rather requires the siting of the building envelope to minimise visual, privacy and overshadowing impacts on neighbours, increase landscaped areas between driveways, dwellings and boundaries and provide planting within side setbacks.

The variation is a result of the need to accommodate the access driveway to the rear parking area in the eastern elevation, requiring a 6.2m setback, greatly in excess of the 4m requirement. Significant landscaping is proposed across the site and within the side setbacks, reducing perceived bulk and scale, and screening the development to reduce overlooking.

First-floor windows are limited to bedrooms and bathrooms, with the main living areas oriented to the rear of the site. The windows have been sited to avoid direct overlooking with the adjoining first floor windows, as shown in the extract below. The development, despite the non-compliance, is therefore not expected to result in unreasonable privacy impacts.

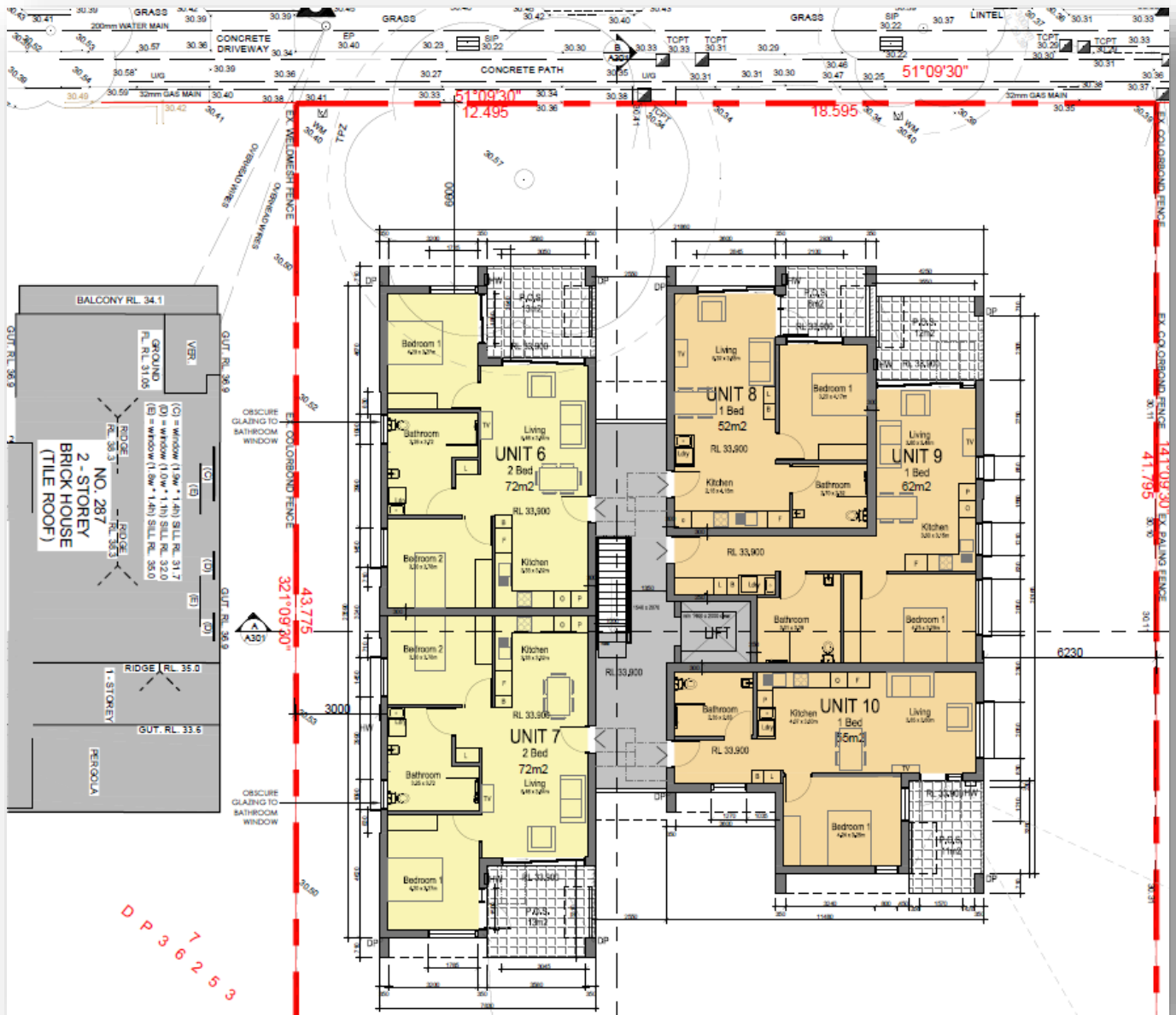


Figure 12 First-floor extract showing sited windows – First Level
(Source: Architectural Plans, CMA, dated 03/02/2023)

As previously discussed, the proposed development will also not generate any significant adverse amenity impacts on surrounding properties in terms of overshadowing due to its north/south orientation. Shadows to neighbouring development to the west (No.287 Beauchamp Road) will be confined to the morning period. The proposal therefore generates no unacceptable solar impacts to surrounding development and the minor numerical non-compliance in relation to side setback is appropriate.

The side setback variation is considered acceptable on balance as it does not result in any adverse environmental impacts and satisfies the intent of *Seniors Living Policy: Urban design guidelines for infill development*.

The development is also consistent with the objectives of the Seniors SEPP in that it:

- contributes to the increase in supply of suitable accommodation for seniors;

- meets the current and future accommodation needs of Sydney's ageing population;
- provides seniors accommodation close to existing infrastructure;
- is well-located to public transport connections; and
- does not affect any heritage assets.

The proposed variation of the side setback control therefore has significant environmental benefits as the development increases the supply of seniors housing while positively contributing to the surrounding area.

6 Notification, Consultation and Consideration of Responses

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

6.1 Council Notification

In accordance with section 108C of the Housing SEPP, Randwick City Council was notified of the development by letter dated 10 August 2022 (refer to **Appendix B**). The notification response period formally closed on 16 December 2022, and Council responded to the notification by letter dated December 18 2022, with matters raised outlined in **Table 14** below. The identified requirements have been prepared taking into consideration Council standard conditions of consent (refer to **Appendix C**).

Table 14 Issues raised in Council submission

Issues raised	Response
<p><u>Permissibility</u></p> <p>The Housing for Seniors Checklist notes that Seniors Housing is permissible within the R2 Low Residential zone under Randwick LEP 2012. This is incorrect, as Senior Housing is prohibited within the R2 zone.</p> <p>Notwithstanding, the R2 zone is listed as a prescribed zone to which the Part applies in clause 79 of the Housing SEPP. The development is therefore permissible under the SEPP.</p>	<p>An updated checklist has been provided to support the REF package.</p>
<p><u>Streetscape / Front Fence</u></p> <p>The proposal is designed with landscaped front setbacks with 1.5m high privacy screens on to of low retaining walls to enclose the front private open space areas. The total height of the fencing is unclear, as neither the height of the retaining walls nor the total height of fencing is dimensioned on the plans. The screens are constructed of timber-look metal slats that appear to have more generous spacing to the top portion of the fence, however details are limited in this regard.</p> <p>Recommendation</p> <p>Front fencing should comply with Section 7.2 of Part C2 Medium Density Residential of the Randwick DCP. In particular, the overall height of the fencing should exceed 1800mm and the upper two thirds should be partially open. Landscaping should be utilised to provide additional privacy to the front private open space areas if required.</p>	<p>The supporting architectural were amended to provide greater clarity in response to Council's comments.</p> <p>The overall height of retaining walls and privacy screens have now been included on the front elevation. Fencing within the front setback does not exceed 1.8m in height. An Identified Requirement is recommended requiring the design of the fence be amended so that the upper two thirds of the fence (the top 1200mm) is at least 30% open in accordance with Section 7.2 of the Randwick DCP (refer to Identified Requirement 88). Following further consideration the proposed front fencing it is considered to be appropriate in this instance as:</p> <ul style="list-style-type: none"> The fences are set well back from the streetscape, 2.7m on the eastern side and 4.8m on the western side. These substantial setbacks reduce apparent bulk and scale and provide for an attractive, open streetscape. Extensive landscaping is proposed within the frontage forward of the fencing,

Issues raised	Response
	<p>including hedge plantings capable of reaching mature heights of 5m and retention of existing tree.</p> <ul style="list-style-type: none"> • The fencing does not extend continuously across the entire frontage; it is broken in the centre by the entryway to the building and ceases just short of the driveway on the eastern side resulting in fencing across about 70% of the total frontage – with 30% having no fencing. • Passive surveillance of the street / public space-domain is still achievable despite the front fence design both from the POS areas, and from first floor windows and balconies. • The impact of fencing is on the streetscape is ameliorated by the setbacks of the fencing i.e. the fencing in the front setback is not on the front/street boundary as typically seen but rather setback 2.7m from the front boundary, and with extensive landscaping proposed in front of it. <p>The proposal is therefore considered to provide adequate privacy for the front PPOS areas, whilst delivering an acceptable streetscape outcome.</p>
<p><u>Sustainability</u></p> <p>A BASIX certificate has been submitted with the proposal that shows the development meets the minimum Water, Energy and Thermal Comfort targets.</p> <p>Recommendation</p> <p>To improve the overall sustainability performance of the development, Council recommends the proposal be amended to include:</p> <ul style="list-style-type: none"> • replacement of gas hot water heating and cooktops with electric appliances • EV charging points in the car park • installation of solar panels and battery storage to provide power to the entire development. 	<p>The proposed activity has achieved the minimum BASIX requirement however an Identified Requirement is recommended for inclusion on the Activity Approval requiring the development to upgrade to include additional features that would allow each individual dwelling to receive a minimum 6 star NatHERS rating. Refer to Identified Requirement 86.</p> <p>Replacement of gas and the installation of solar panels to power the entire development is not currently required under existing policy guidelines and is therefore not proposed. However an Identified Requirement has been proposed in relation to the provision of solar panels if further analysis in the tender design phase of the project confirms that provision of a <i>solar (photovoltaic electricity generating) energy system</i> is viable for the project, refer to Identified Requirement No. 87.</p> <p>Electrical wiring will be installed so that EV charging points will be easily adaptable in the future.</p>

Issues raised	Response
<p><u>Privacy</u></p> <p>The property contains a number of windows at ground and first floors that have the potential to overlook adjoining properties to the east and west.</p> <p>Recommendation</p> <p>All habitable room windows facing side elevations at ground and first floor levels shall be provided with appropriate privacy measures (i.e. 1.6m sill height or privacy screen).</p>	<p>A number of amendments were made to the architectural plans in response to Council's privacy concerns. These include:</p> <ul style="list-style-type: none"> • Privacy screen to be extended around western side of Unit 1 POS (alongside boundary). • Existing Colorbond fence to be extended if required to meet privacy screen. • Side facing bathroom windows are to be translucent glazing. • Unit 5 privacy screen has been amended to be 1.6m high AFFL. • The living room window of Unit 10 has been amended to 2 double-hung windows (instead of the previously proposed slider) with obscure lower sashes. • Detail has been added to show actual size and orientation of proposed louvres – see A-123 for Unit 10 unit layout plan and detail. <p>It should also be noted that a row of Lilly Pillies (<i>Syzygium australe</i> 'Pinnacle') is proposed along both side boundaries. These are specified as 25L pots with a mature height of 6-10m. They are known to be a fast-growing species and suitable as hedge planting providing good privacy due to its dense foliage.</p> <p>Given the above amendments, and proposed screening landscaping, it is considered that the proposal provides an adequate privacy outcome that does not result in adverse overlooking impacts to adjoining properties.</p>
<p><u>Notification</u></p> <p>Clause 108C(1)(b)(iii) of the Housing SEPP requires LAHC give written notice to the occupiers of adjoining land. Adjoining properties that will be notified include:</p> <ul style="list-style-type: none"> • 287 Beauchamp Road • 295 Beauchamp Road • 6 Bapaume Parade • 8 Bapaume Parade • 10 Bapaume Parade • 12 Bapaume Parade. 	<p>On 25 November 2021 Randwick City Council, via email correspondence, provided a map of all adjoining properties that were required to be notified. This map included all properties subsequently listed in Council's submission. Refer to Section 6.2 of the REF for further details regarding neighbour notification.</p> <p>Confirmation has been obtained from LAHCs Community Engagement Team that notification was undertaken in accordance with Council's comments in relation to notification requirements.</p>

Issues raised	Response
<p>Council's Community Participation Plan requires written notice be provided to properties within a 40m radius of the development site.</p> <p>Recommendation</p> <p>The notification of adjoining properties should be extended to align with the Randwick City Council Community Participation Plan. A list of addresses can be provided by Council if required.</p>	

6.2 Notification of Occupiers of Adjoining Land and Other Persons

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

Advice was sought from Council regarding additional persons or property that should be notified of the development via an email dated 28 October 2021. Council provided an email response on 10 November 2021 advising that the scope of notification is to be expanded to include all properties within 40m of the site and should also include landowners in addition to the occupiers of the properties in accordance with Council's Community Participation Plan. Correspondence from Randwick City Council and LAHC, dated 07.03.23, confirmed owners details remain current. **Figure 13** illustrates the properties in which the occupiers and landowners were notified of the development.



Figure 13 Map of Properties Notified of the Proposed Development
(Source: LAHC)

Under section 108C(1)(b) of Housing SEPP, occupiers of adjoining land, were notified of the proposed development activity, in addition to landowners and occupiers of properties within 40m of the development site, (refer to **Figure 13**), by letter dated 24 November 2022. Copies of the notification letters are provided at **Appendix B**.

The notification response period formally closed on 16 December 2022, with no submissions received from adjoining landowners or occupiers. A late submission however was received from the adjoining property at 10 Bapaume Parade on 3 February 2023. The submission raised the following concerns:

- Wanted to know what was to happen to the rear fence, as it was constructed in 2021. If the fence is to be replaced, what would be the height and colour.
- Can plants along back fence line be reviewed as the mature height is 5m and this will create too much shade in his back yard.

In response, the following clarifications were provided:

- The fence is not to be replaced.
- An **Identified Requirement (No. 90)** has been recommended which will substitute the planting along the rear fence line of this neighbours boundary only, with a different type of Lilly Pilly: *Acmena Smithii* 'Forest Flame' - mature height 2m.

6.3 Notification of Specified Public Authorities

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

7 Review of Environmental Factors

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

7.1 Neighbourhood Character

The site is located within an established low-density residential area characterised by a mix of older style single storey detached dwelling houses of brick construction and newer two storey brick dwelling houses and multi-dwelling houses. A single storey detached dwelling house, similar to those on the subject site, adjoin the site to the east, whilst to the west and directly opposite the development two storey dwellings dominate.

The wider surrounding locality is generally comprised of two-storey dwelling houses with some multi-dwelling developments interspersed.

The proposed development is consistent with the existing character of the neighbourhood. The development has been sufficiently articulated to present as two separate two-storey building forms in an effort to reduce mass. The proposal provides adequate separation between adjoining buildings, consists a sloped roof, consists of brick materials, and provides a front garden setting and perimeter plantings to deliver a built form outcome that is generally consistent with the planning controls and the character of the locality, and makes a positive contribution to the streetscape.

Mitigation Measures

No mitigation measures are required.

7.2 Bulk and Density

The proposed development is compatible with the bulk and scale existing in the area, and satisfies Council's LEP controls for height. Council's LEP specifies a height control of 9.5m, whereas the proposed development provides a total height of 8.4m. A floor space ratio of 0.55:1 is proposed which exceeds the maximum floor space density control of 0.5:1 specified development on the site under the RLEP 2012. A detailed justification has been provided under **Table 7** of this REF. In summary, the proposed FSR variation is considered acceptable on merit given its minor nature, articulation of the development, significant landscaped embellishments proposed, choice of materials and colours to reflect the local character of the area, which all ultimately reduce the apparent bulk and scale of the development.

The development also proposes a 3m side setback to the western elevation, 1m short of the 4m Randwick DCP requirement. The variation is a result of the need to accommodate the access driveway to the rear parking area in the eastern elevation, requiring a 6.2m setback, greatly in excess of the 4m requirement. As discussed in **Section 5.1.11**, the variation is considered acceptable as the development has appropriately considered the context of the site and has been designed to ameliorate potential privacy and visual impacts.

The above measures illustrate that the development has appropriately considered the context of the site and has been designed to complement its surroundings. The proposal exceeds the minimum landscaped area, private open space and deep soil requirements, which ensures the development makes a positive contribution to the streetscape and general locality.

The development has been designed to comply with *Seniors Living Policy: Urban design guidelines for infill development*. This policy requires the siting of the building envelope to minimise visual, privacy and overshadowing impacts on neighbours, increased landscaped areas between driveways, dwellings and boundaries and provides planting within side setbacks.

It is therefore considered that on balance, the proposed development provides an acceptable bulk and scale as viewed from the streetscape, which is consistent with the two-storey residential character of the immediate locality.

Mitigation Measures

No mitigation measures are required.

7.3 Streetscape

The proposed development activity will make a positive contribution to the streetscape of Beauchamp Road, by virtue of the following:

- The proposed development will replace ageing housing stock that has reached the end of its economic life with a new contemporary, architecturally designed residential development.
- Living rooms and balconies address and provide an active frontage to Beauchamp Road.
- The front façade is modulated by projecting and recessed elements and further articulated through the use of different materials and textures.
- Significant landscaping being provided throughout the development, which will benefit the streetscape interactions, including the retention of the existing mature tree in the front setback, and planting of 623 plants, including some that grow to a mature height of 10m.

Mitigation Measures

No mitigation measures are required.

7.4 Visual Impact

The proposed development will have a short-term visual impact on the surrounding area during construction, with an altered long term positive visual impact associated with the establishment of new dwellings in an existing urban residential context. The retention of the existing mature tree within the front setback will help screen impacts during construction, and integrate the new dwelling into the existing streetscape once completed.

The proposed development will make a positive contribution to the residential streetscape through construction of new contemporary dwellings that respond to the site context and neighbourhood character. New landscape plantings within the setbacks and along the boundaries of the site will add to the long-term visual amenity of the surroundings.

Mitigation Measures

No mitigation measures are required.

7.5 Privacy

A reasonable level of privacy will be maintained by the proposed development, by virtue of the following:

- The balconies of Units 6, 8 & 9 are oriented towards the street, and the balconies to Unit 7 and 10 towards the rear setback. The rear setback of 13m is greatly in excess of the required 5m under the RDCP 2012, and is unlikely to result in any direct overlooking of adjoining properties to the rear. No other upper level balconies are proposed to either side elevation.
- First-floor windows to the western elevation have been limited to bedrooms and bathrooms, with habitable rooms oriented towards the rear to minimise occurrence of overlooking. The western elevation windows have been sited to avoid direct overlooking into the existing upper-level windows of the adjoining dwelling at 287 Beauchamp Road.
- Obscure glazing is provided to the bathroom windows of Units 6 & 7 to prevent overlooking between both properties.
- The specified planting is a row of Lilly Pillies (*Syzygium australe* ‘Pinnacle’) along the western boundary. These are specified as 25L pots with a mature height of 6-10m. These are known to be a fast-growing species and suitable as hedge planting providing good privacy due to its dense foliage.
- Ground floor windows facing the side boundaries are adequately set back and boarded by 1.8m high boundary fencing and perimeter landscaping.

Mitigation Measures

No mitigation measures are required.

7.6 Solar Access

The proposed building has been designed to maximise direct sunlight access in midwinter. Eight of the 10 units (80%) will achieve at least 3 hours of solar access to their living areas and POS at midwinter, which complies with the minimum of 70% stipulated in Section 108 of the Housing SEPP.

Mitigation Measures

No mitigation measures are required.

7.7 Overshadowing

The shadow diagrams in **Appendix E** indicate that the adjoining dwellings will continue to receive a minimum 3 hours of midwinter solar access to primary living and open space areas, that is:

- The west-adjoining dwelling at 278 Beauchamp Road will be impacted by shadows from the proposed development during midwinter morning, with the shadows generally falling onto the ground floor of the eastern elevation, and receding by 12pm; and
- The east-adjoining dwelling at 295 Beauchamp Road will be not impacted in midwinter between 9am and 3pm; and
- The primary open space at the rear of the adjoining dwelling at 278 Beauchamp Road will be shadow impacted by the proposed development between at 9am, however this clears by 12pm, and achieves 3 hours access until 3pm.
- The adjoining private open space at 295 Beauchamp Road will not be overshadowed between 9am and 3pm.

Mitigation Measures

No mitigation measures are required.

7.8 Traffic & Parking

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

Proposed on-site parking provision (5 spaces) exceeds the Housing SEPP, (section 108), requirement by two spaces. The Traffic and Parking Assessment Report (**Appendix M**) indicates that the development will have a projected nett increase in both the morning and afternoon peak periods. This generation outcome will be slightly more than the existing dwellings on the site however it is apparent that the proposed development will not result in any unsatisfactory traffic implications.

The Traffic and Parking Assessment Report examined the adequacy of the proposed internal driveway and parking arrangement. The assessment confirmed that the design is suitable based on an assessment of the project vehicle movements and complies with the requirements of AS2890.1.

Mitigation measures

No mitigation measures are required.

7.9 Flora and Fauna

An Arboricultural Impact Assessment has been prepared for the site by Redgum Horticultural (**Appendix F**). The report considers 7 trees, 4 of which are located within the subject site. Of the 3 trees outside the site, one is a street tree in the road reserve, and the remaining 2 are within neighbouring properties.

The report recommends the removal of 3 existing trees within the site (Trees 3, 6 & 7) that are either located within the proposed development footprint or that would be impacted by an unavoidable major encroachment within their tree protection zones. The report also recommends retention of one tree within the site (Tree 1), one street tree (Tree 2) and 2 trees within neighbouring properties (Trees 4 and 5).

The assessment notes that, due to the alignment of the development, there will be a major encroachment to Tree 1. A root mapping investigation is recommended to be undertaken along the building footprint closest to the specimen to ascertain the impacts on the tree. Construction methods are to be altered according to ensure the tree's vitality. A site-specific **Identified Requirement (82)** has been added to this effect.

Appropriate replacement planting 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, including flowering trees, which will provide additional habitat for fauna in the long-term.

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

Mitigation measures

The Arboricultural Impact Assessment and Tree Management Plan recommends the following mitigation measures:

- Trees 1, 2, 4 & 5 are to be retained in situ and are to be protected as detailed in Section 7.5 – 7.9 and Section 14 of part B of the arborist report. Tree protection fences, or works, to be situated in accordance with Site Plan B - Trees to be retained and Tree Protection Zones (Appendix F of arborist report). See Tree Protection Plan in Arboricultural Impact Assessment and Tree Management Plan for additional protection measures for the management of retained specimens.
- Trees 3, 6 & 7 are to be removed which is to be undertaken in accordance with 7.10 - 7.11 and Section 13 of Part B of the arborist report.
- Each of the replacement trees are to be a vigorous specimen with a straight trunk, gradually tapering and continuous, crown excurrent, symmetrical, with roots established but not pot bound in a volume container or approved similar and be maintained by an appropriately qualified and experienced landscape contractor for up to one year after planting, or as appropriate.

These 3 mitigation measures have been included in the list of site-specific identified requirements. As noted above, a further measure requiring root mapping of Tree 1 has also been included.

Additionally, standard **Identified Requirements (Nos. 20 and 34)** ensure that tree removal and protection occur in accordance with the landscape plan and arborist report.

7.10 Heritage (European / Indigenous)

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

Aboriginal Heritage

An Aboriginal Heritage Information Management System (AHIMS) search, dated 10 January 2023 (**Appendix N**) did not find any record of Aboriginal Sites or Places on the site or in the surrounding locality and the site is considered to be disturbed land. Consideration of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* determined that no additional investigation was warranted. Discovery of cultural material during development activities cannot be ruled out, however, and therefore an identified requirement has been applied should any Aboriginal relics be discovered on the site during excavation/construction.

Other Cultural Heritage

No cultural heritage items have been identified in Randwick City 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 Requirements (No. 45 & 46)** has been applied should any cultural heritage relics be discovered on the site during excavation / construction.

7.11 Soils / Contamination / Acid Sulfate Soils / Salinity

Geotechnical

A Geotechnical Site Investigation, prepared by STS Geotechnics indicates the following:

- The subsurface conditions generally consist of topsoil, fill and sands overlying weathered sandstone. Topsoil and fill were present to depths of 0.3m to 0.6m.

- In general, loose- to medium-dense becoming medium-dense sands are present to depths of 3m and in excess of 6m. In BH2, loose sands are present to a depth of 3.m. In BH2, weathered sandstone underlies the sands to the depth of auger refusal, 3.5m.
- Groundwater was not observed during drilling works.

Mitigation Measures

No mitigation measures are required.

Contamination

The site is located within a developed residential area of Matraville, which has a history of residential uses. LAHC historical layout plan No. L1087/5 (Appendix O) indicates that the area was being developed for residential purposes from as early as 1947. Given the long-term continuous use of the land for residential purposes, the highly disturbed nature of the site, and given that the Section 10.7 Planning Certificates (Appendix A) have not identified the site as being potentially contaminated, 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

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

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 Report (**Appendix K**) also confirms that reference to DLWC (2002) "Site Investigations for Urban Salinity" indicates that ECe values of 0.1 dS/m and 0.3 dS/m are consistent with the presence of non-saline soils.

Mitigation Measures

No mitigation measures are required.

7.12 Drainage / Flood Prone Land / Hydrology/ Water Quality

Stormwater drainage for the proposed development has been designed in accordance with Council's requirements. Stormwater will be collected via a series of stormwater pits and gutters on the site connected to an underground stormwater absorption trench located in the rear setback under the at-grade parking spaces. Roof water will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground absorption trench.

Roof water from the subject development will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground rainwater tank and absorption tank.

The Section 10.7(2) & (5) Planning Certificates issued by Council for the subject site indicate that the land is located in a flood planning area. A Flood Letter has been prepared to address flooding requirements for development on the site and is provided as **Appendix U**.

The letter advises of the following flood affectations:

- The site is affected by flooding in the 1% AEP event but not in the 5% AEP event. All flooding is categorised as low hazard.
- The site has a localised low point along its eastern boundary with the adjoining site at No. 295 Beauchamp Road, which will be impacted by overland flow.

Based on Council flood modelling, the site is flood-affected to RL30.30. This equates to small, limited areas to the Beauchamp Road frontage associated with an existing stormwater pit in a low point of the footpath in the street frontage.

The proposed development has been designed to have no adverse impact on the hydrology or water quality within the local area. As noted in the Flood Letter, a drainage pit is recommended to be installed at the existing low point between the development and the neighbouring property at No. 295 Beauchamp Road in order to collect any flows from the property and prevent nuisance ponding from occurring along the site boundary. **Identified Requirement No. 83** has been included to ensure the pit is provided.

The supporting Flood Letter confirms that the flooding is low hazard and will not affect the proposed development. The required floor levels for the building are to RL30.80 to provide the required 500mm freeboard. The letter concludes that:

- the site is suitable for seniors housing;
- the site is safe for people;
- the site is safe for the building;
- there will be no displacement of water/flood waters elsewhere; and
- if required, a safe evacuation route can be provided from the site east along Beauchamp Road, which will be through low-hazard flood water of up to 150mm depth.

Mitigation Measures

Identified Requirements (Nos. 6-9, 14, 41, 83 & 85) have been recommended to ensure that stormwater drainage is managed in accordance with legislative requirements.

7.13 Bushfire Prone Land

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

Mitigation Measures

No mitigation measures are required.

7.14 Noise and Vibration

During Demolition/Construction

During demolition/construction, typical noise levels associated with demolition/building works will be generated within the hours prescribed under the former Department of Environment and Climate Change 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 that would generate unacceptable noise during occupation will be installed in the proposed development.

The building will be constructed to comply with the deemed-to-comply provisions of the *Building Code of Australia* with respect to noise transmission. The dwellings are to be designed and constructed to achieve internal noise level design targets.

The site itself is subject to road noise and as discussed above an acoustic report has been prepared in accordance with the requirements of the relevant Australian Standards to ensure that the residential amenity of future residents is appropriate.

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.

To address road noise, the report provides external glass acoustic requirements with a minimum performance of Rw 28-30. The report notes that this can be achieved during detailed design, at the CC stage of the development.

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, 57, & 59)** have been applied to ensure compliance with the above mitigation measures.

7.15 Air Quality

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

Mitigation Measures

Appropriate standard **Identified Requirements (Nos. 60, 61, & 63 - 65)** have been applied that will satisfactorily mitigate any potential or adverse impacts on air quality.

7.16 Waste Minimisation

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

During Demolition

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

- excavation material will be reused to fill areas of landscaping or sent to landscaping suppliers if applicable;
- green waste will be used as fill and landscaping, with excess to be sent to landscaping suppliers;

- all bricks will be recycled/reused by the builder; and
- timber, metal, wall and roof cladding and other salvageable materials will be reused on site or sold to various salvage yards where appropriate.

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

During Construction

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

- bricks, tile and concrete to be transported to building recycling facility;
- concrete shall be crushed and reused for filling, levelling or temporary road base, with excess transported to recycling company;
- timber shall be chipped and reused on site or sent to second hand suppliers;
- plasterboard shall be broken up and used in landscaping or sent to building recycling facility; and
- metal offcuts from gutter and downpipes, etc. shall be recycled wherever possible.

During Occupation

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

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

Mitigation Measures

Identified Requirements (Nos. 44, 47-55) are recommended to ensure construction/demolition waste is appropriately managed and disposed of.

An **Identified Requirement (No. 35)** is recommended to require the preparation of a final waste management plan for the demolition, construction and occupation phases of the development.

7.17 Resource Use & Availability

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

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

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

Mitigation Measures

No additional mitigation measures are required.

7.18 Community / Social Effects

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

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

Mitigation Measures

No mitigation measures are required.

7.19 Economic Impact

The proposed development is likely to contribute to a range of economic benefits in the Randwick 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;
- on-going consumption from new/ additional households;
- the reduced maintenance costs of the newer housing; and
- savings associated with improved energy and water efficiency.

Mitigation Measures

No mitigation measures are required.

7.20 Cumulative Impact Assessment

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

- the proposed activity will not result in any adverse cumulative impact when considered in conjunction with any other proposals or developments in the area;
- there will be no synergistic effects of individual project impacts from the proposed activity when considered in combination; and

- there are no known environmental stresses in the area of the proposed activity that would be increased.

Mitigation Measures

No mitigation measures are required.

8 Conclusion

8.1 Summary of Key Issues Raised in Assessment

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

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

As demonstrated in this REF, the proposed activity is consistent with the relevant objectives and standards set out in the Housing SEPP, SLEP 2012, 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. It will also 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 1 and 2 bedroom seniors housing dwellings in the local area. Therefore, the proposed development is clearly in the public interest.

9 Recommendation

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

APPENDIX A – SECTION 10.7 CERTIFICATES

APPENDIX B – NOTIFICATION

APPENDIX C – IDENTIFIED REQUIREMENTS

APPENDIX D – SENIORS LIVING POLICY CHECKLIST

APPENDIX E – DEVELOPMENT PLANS

APPENDIX F – ARBORIST REPORT

APPENDIX G – ACCESS REPORT

APPENDIX H – BASIX & NATHERS CERTIFICATES

APPENDIX I – BCA COMPLIANCE REPORT

APPENDIX J – ACOUSTIC REPORT

APPENDIX K – SITE INVESTIGATION GEOTECHNICAL

APPENDIX L – WASTE MANAGEMENT PLAN

APPENDIX M – TRAFFIC REPORT

APPENDIX N – AHIMS

APPENDIX O – TITLES & DP

APPENDIX P – SURVEY

APPENDIX Q – DESIGN COMPLIANCE CERTIFICATES

APPENDIX R – LANDSCAPE PLANS

APPENDIX S – CIVIL PLANS

APPENDIX T – HYDRAULIC PLANS

APPENDIX U – FLOOD ADVICE LETTER