

Department of Planning and Environment

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REVIEW OF ENVIRONMENTAL FACTORS

Boarding House

at

3-5 Kelloway Avenue, Camden NSW 2570

December 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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Department of Planning & Environment

Land & Housing Corporation

Postal address: Locked Bag 5022, Parramatta NSW 2124

W www.dpie.nsw.gov.au | E facsinfo@fac.nsw.gov.au

ABN 24 960 729 253




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DOCUMENT CONTROL REGISTER

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

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2	31.10.2023	v2	LAHC Senior Planner Review	All
2	05.12.2023	v3	LAHC Senior Planner Review	All
3	05.12.2023	v4	LAHC Manager Review	All

DOCUMENT SIGN-OFF

REF Prepared & Peer Reviewed by:	
Having prepared the Review of Environmental Factors: <ul style="list-style-type: none">I have declared any possible conflict of interests (real, potential or perceived) to the A/Head of Policy and Innovation, NSW Land and Housing Corporation.I do not consider I have any personal interests that would affect my professional judgement.I will inform the A/Head of Policy and Innovation, NSW Land and Housing Corporation as soon as I become aware of a possible conflict of interest.	
Name:	Callum Sangkuhl
Designation:	Associate Planner, WSP Australia Pty Ltd
Signature:	 Date: 30/08/2023
Peer reviewed by:	
Name:	Gavin Ho
Designation:	Senior Planner, NSW Land & Housing Corporation
Signature:	 Date: 5/12/2023
REF Reviewed & Endorsed by:	
I certify that I have reviewed and endorsed this Review of Environmental Factors:	
Name:	Carolyn Howell
Designation:	Manager, Planning and Assessment, NSW Land & Housing Corporation
Signature:	 Date: 5 December 2023

REF Authorised for Issue by:

Having endorsed the Review of Environmental Factors:

1. I have declared any possible conflict of interests (real, potential or perceived) to the A/Head of Policy and Innovation, NSW Land and Housing Corporation.
2. I do not consider I have any personal interests that would affect my professional judgement.
3. I will inform the A/Head of Policy and Innovation, NSW Land and Housing Corporation as soon as I become aware of a possible conflict of interest.

Name: Yolanda Gil

Designation: Director, Portfolio Services, NSW Land & Housing Corporation

Signature:



Date: 15 Dec. 2023

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1 Executive Summary

The subject site is located at 3-5 Kelloway Avenue, Camden NSW 2570, and is legally described as Lot 17 DP 219782 and Lot 18 DP 219782.

The proposed development is described as follows:

Consolidation of lots and construction of a 2 storey boarding house consisting of 12 new generation boarding house rooms, on-site parking for 3 cars, 1 motorbike and 4 bicycles, landscaping and tree removal.

The proposed activity is permitted on the site under the provisions of Chapter 2, Part 2, Division 3 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) and can therefore be carried out by the NSW Land and Housing Corporation (LAHC) without consent as it does not result in more than 12 boarding rooms.

Demolition is not required as part of the proposed activity; demolition activities have already been undertaken previously at the site to remove structures. There are no current structures on site.

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 the *Good Design for Social Housing* and *NSW Land and Housing Corporation Design Requirements*;
- the site planning and design of the proposed activity adequately address the applicable local environmental planning and development controls of Camden 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.
- Camden 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 26 July 2023. Comments on the response are provided in Section 6.1 of this REF. 1 submission was received from 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 and long-term negative impacts on the environment and can proceed subject to the implementation of the Identified Requirements of determination contained in the **Activity Determination**.

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 site preparation including removal of trees, and the construction of a Boarding House Development with 12 x boarding rooms and communal living area, with associated landscaping and fencing, surface parking for 3 cars, and consolidation into a single lot at 3-5 Kelloway Avenue, Camden NSW 2570.

The activity¹ 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 *WSP Australia Pty Ltd* 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* (EP&A Regulations) 2021.

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

2.1 Summary of Proposed Activity

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

Plans, Drawings & Supporting Document Details

The development is outlined in the following plans and drawings:

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
Architectural Plans – Appendix A				
Coversheet	A000	01	8/12/2022	Sam Crawford Architects
Block Analysis Plan	A101	01	8/12/2022	Sam Crawford Architects
Site Analysis Plan	A102	01	8/12/2022	Sam Crawford Architects
Development Data	A104	01	8/12/2022	Sam Crawford Architects
Site Plan	A105	01	8/12/2022	Sam Crawford Architects
Ground Floor Plan	A106	01	8/12/2022	Sam Crawford Architects
First Floor Plan	A107	01	8/12/2022	Sam Crawford Architects
Roof Plan	A108	01	8/12/2022	Sam Crawford Architects
North Elevation (Street)	A201	01	8/12/2022	Sam Crawford Architects
South Elevation (Rear)	A202	01	8/12/2022	Sam Crawford Architects
East Elevation	A203	01	8/12/2022	Sam Crawford Architects
West Elevation	A204	01	8/12/2022	Sam Crawford Architects
Section (Long)	A301	01	8/12/2022	Sam Crawford Architects
Section (Cross 01)	A302	01	8/12/2022	Sam Crawford Architects
Section (Cross 02)	A303	01	8/12/2022	Sam Crawford Architects
Shadow Diagrams	A401	01	8/12/2022	Sam Crawford Architects

¹ Note: The proposed development is permitted without consent and is therefore subject to environmental impact assessment as an 'activity' under Part 5 of the Environmental Planning and Assessment Act 1979.

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
Solar Diagrams North West	A402	01	8/12/2022	Sam Crawford Architects
Solar Diagrams North East	A403	01	8/12/2022	Sam Crawford Architects
Solar Diagrams South West	A404	01	8/12/2022	Sam Crawford Architects
Solar Diagrams South West	A405	01	8/12/2022	Sam Crawford Architects
Material Schedule	A501	01	8/12/2022	Sam Crawford Architects
Photomontage	A601	01	8/12/2022	Sam Crawford Architects
Landscape Plans - Appendix B				
Note: Place Design Group have made an error in the title block for the revision date, as it is listed as "07/106/2023", as should read "07/06/2023"				
Extent of works	Page No.3	02	7/06/2023	Place Design Group Pty Ltd
Landscape Plan	Page No.4	02	7/06/2023	Place Design Group Pty Ltd
Fencing Strategy and Materials Schedule	Page No.5	02	7/06/2023	Place Design Group Pty Ltd
Materials Schedule	Page No.6	02	7/06/2023	Place Design Group Pty Ltd
Landscape Key Plan and Sections	Page No.7	02	7/06/2023	Place Design Group Pty Ltd
Planting Schedule	Page No.8	02	7/06/2023	Place Design Group Pty Ltd
Typical Landscape Details	Page No.9	02	7/06/2023	Place Design Group Pty Ltd
Civil Plans – Appendix C				
Civil Construction Notes	80822228-CI-0002	3	12/12/2022	Cardno Pty Ltd
Proposed Drainage Stormwater Ground Floor Plan	80822228-CI-0101	5	4/09/2023	Cardno Pty Ltd
Proposed Drainage Stormwater Pits and Grated Drains Schedule	80822228-CI-0102	4	31/08/2023	Cardno Pty Ltd
Cut and Fill Plan	80822228-CI-0111	1	12/12/2022	Cardno Pty Ltd
Sedimentation and Erosion Control Plan	80822228-CI-0121	3	12/12/2022	Cardno Pty Ltd
Stormwater Standard Details Sheet 1	80822228-CI-0201	3	12/12/2022	Cardno Pty Ltd
Stormwater Standard Details Sheet 2	80822228-CI-0202	2	12/12/2022	Cardno Pty Ltd
Sedimentation and Erosion Control Details	80822228-CI-0221	3	12/12/2022	Cardno Pty Ltd
Survey Plan – Appendix D				
Detail & Contour Survey	201805-2 SHT1	2	8/11/2022	Total Surveying Solutions
Detail & Contour Survey	201805 SHT1	-	30/10/2020	Total Surveying Solutions
Detail & Contour Survey	201805 SHT1	-	12/10/2020	Total Surveying Solutions
Notification Plans – Appendix E				
Cover Page	A801	01	8/12/2022	Sam Crawford Architects

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
Site/Landscape Plan	A802	01	8/12/2022	Sam Crawford Architects
Development Data	A803	01	8/12/2022	Sam Crawford Architects
Elevations	A804	01	8/12/2022	Sam Crawford Architects
Schedule of Finishes	A805	01	8/12/2022	Sam Crawford Architects
Shadow Diagrams	A806	01	8/12/2022	Sam Crawford Architects
Specialist Reports				
Access Review – Appendix H	-	05	05/05/2022	Morris Goding Access Consulting
Arboricultural Assessment and Tree Protection Plan – Appendix J	-	03	12/09/2022	Vertical Tree Management & Consultancy
BASIX Certificate – Appendix K	1295786M_02	-	28/04/2023	Northrop Consulting Engineers Pty Ltd
BCA Report – Appendix L	202241-01	D	24/04/2023	Mckenzie group
NatHERS Certificate – Appendix N	No.0008288610	-	11/12/2022	Northrop Consulting Engineers Pty Ltd
Character Statement – Appendix O	-	C	08/12/2022	Sam Crawford Architects
Geotechnical Investigation – Appendix P	9557/1-AA-R3	R3	02/08/2023	Geotech Testing Pty Ltd
Waste Management Plan – Appendix R	20165	-	00/12/2022	Dickens Solutions
Traffic and Parking Impact Assessment Report – Appendix S	80822228:HC	-	09/12/2022	Cardno Pty Ltd
Traffic Noise Impact Assessment – Appendix T	20220223	3	27/02/2023	Building Services Engineers
Soil Characterisation Report – Appendix U	3387	0	16/04/1963	ADE Consulting Group
Cost Estimate	MBM0579-0017	01	22/12/2023	MBM

Design Compliance and Checklists – Appendix M

Architect's Certificate of Building Design Compliance – Sam Crawford Architects dated 21/04/2023.

Certificate of Landscape Documentation Compliance – Place Design Group dated 09/12/2022.

Certificate of Civil Documentation Compliance – Cardno Pty Ltd dated 12/12/2022.

AHIMS – Appendix I

AHIMS Search Result, 3-5 Kelloway, Camden – 200m search buffer, date 06/06/2023

Section 10.7 Planning Certificates - Appendix F

Planning Certificate, Certificate No 20223549, 5 Kelloway Avenue, Camden – Issued by Camden Council dated 07/06/2023.

Planning Certificate, Certificate No 20223551, 5 Kelloway Avenue, Camden – Issued by Camden Council dated 07/06/2023.

Titles and Deposited Plans – Appendix Q

Title Search, Folio: 17/219782, Search date 23/05/2023, First Schedule: New South Wales Land and Housing Corporation

Title Search, Folio: 18/219782, Search date 23/05/2023, First Schedule: New South Wales Land and Housing Corporation

Title Search, Folio: 19/219782, Search date 23/05/2023, First Schedule: New South Wales Land and Housing Corporation

Deposited Plan Lot 17,18, 19/DP 219782, Search Date 23/05/2023

2.2 Demolition

No demolition activities are proposed.

The site has already undergone demolition works and handling and removal of asbestos contained within the demolition works has been carried out. The surface of the site is level and free from all demolition materials with services capped.

2.3 Removal of Trees

There are 19 trees located within the site and the proposal includes the removal of 10 of those trees. Trees external to the site within Kelloway Avenue 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 due to being neglected, poorly maintained and pruned (refer to submitted Arboricultural Assessment and Tree Protection Plan in **Appendix J**).

More appropriate tree plantings, including trees capable of reaching mature heights of 5-12m, will be provided as part of the proposed landscape plan to compensate for the loss of these trees (refer to submitted Landscape Plan in **Appendix B**).

2.4 Proposed Dwellings

Of the 12 boarding rooms, 10 rooms have been designed as Livable Housing Australia Silver Level liveable boarding rooms and 2 rooms have been designed as Livable Housing Australia Gold Level liveable boarding rooms, all of which are capable of being adapted to suit persons with a disability should the need arise in the future.

The proposed development represents a contemporary, high-quality design, which will complement the existing character of Kelloway Avenue. The use of face brick for external walls, cladding and sheeting and corrugated metal roof is consistent with the existing and developing character of the Camden suburb. Of the 12 proposed rooms, 8 will address the street (Rooms 1, 2, 3 & 4 on the ground floor and Rooms 7, 8, 9 & 10 at the first floor) with balconies, windows and living areas facing the street for passive surveillance.

Minor cut and fill is proposed to provide a level building platform between (maximum cut of between 1.5m – 2m and maximum fill of between 1m–1.5m). Small retaining walls are proposed to assist with the stability as shown on the Landscape Plans (refer to **Appendix B**).

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, hedges, medium to low shrubs and groundcovers, which will enhance landscaped setbacks and contribute to the streetscape.

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

A total of 3 surface car parking spaces will be provided on the site, including one accessible space.

Stormwater will be collected via a series of stormwater pits and gutters on the site connected to the street drainage pit on the site frontage.

A new 0.8m high Aluminium palisade fence will be provided at the side boundaries forward of the building line at the Kelloway Avenue frontage. A new 1.8m high Colorbond fence is proposed along the remaining side and rear boundaries (refer to **Appendix B** fencing strategy and materials schedule).

Figures 1 – 4 include extracts from the architectural plans illustrating the proposed development.

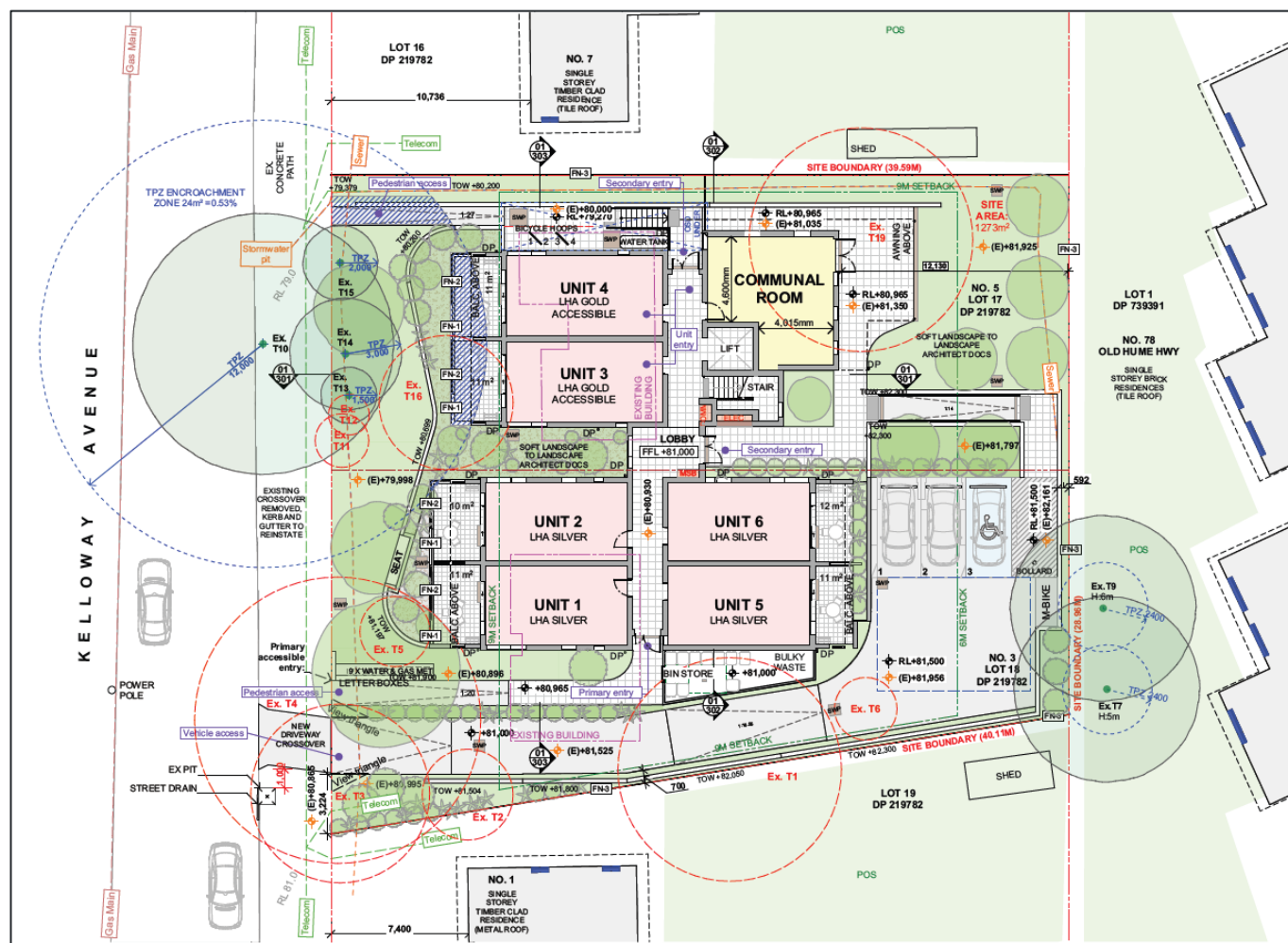


Figure 1 Extract from Architectural Plans – Site Plan (Source: Architectural Plans, Sam Crawford Architects, dated 8/12/2022)

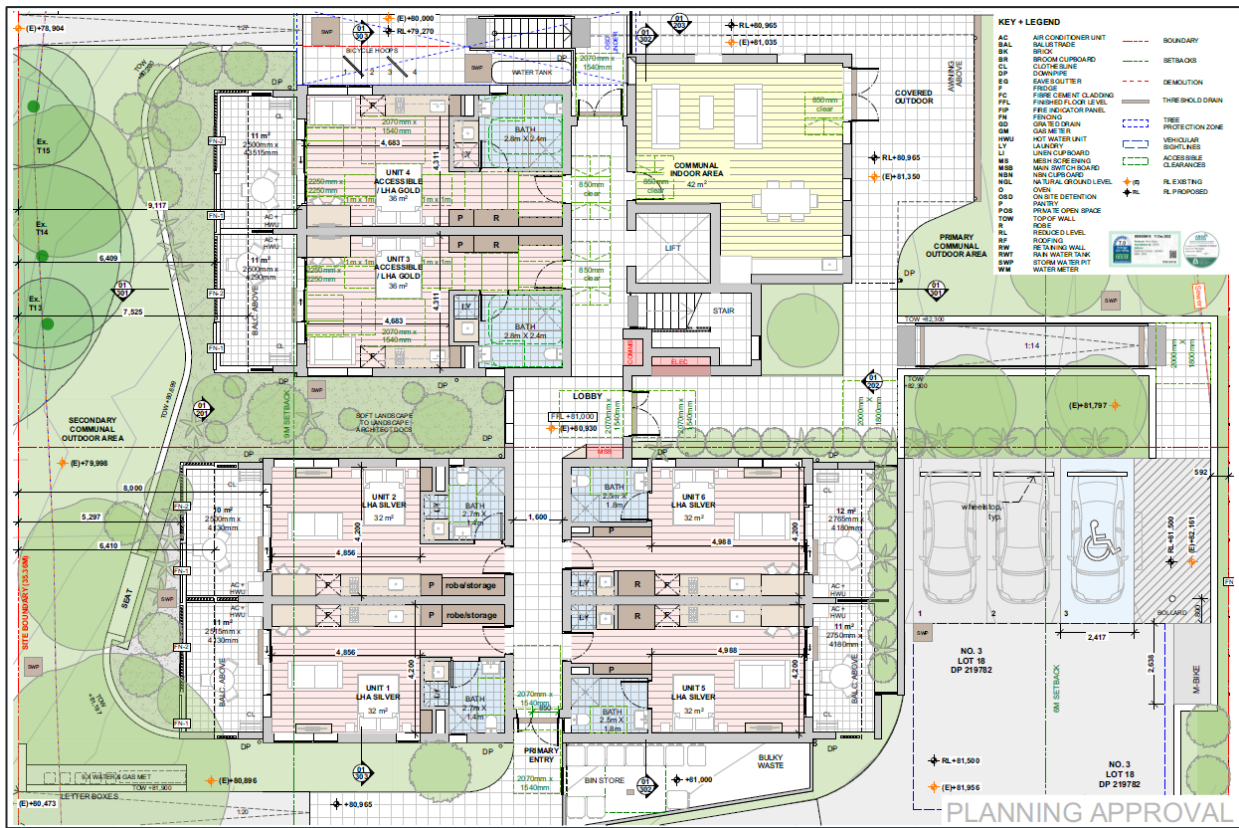


Figure 2 Extract from Architectural Plans –Ground Floor Plan (Source: Architectural Plans, Sam Crawford Architects, dated 8/12/2022)

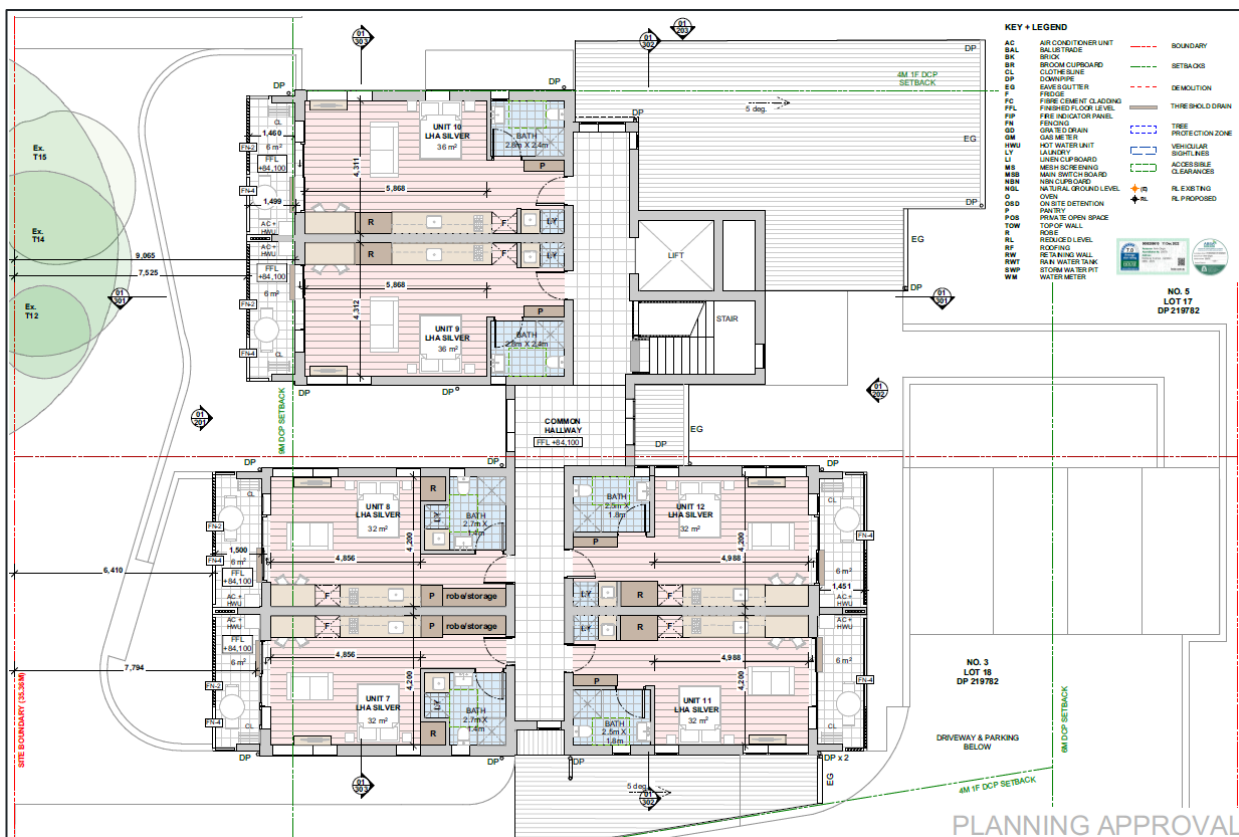


Figure 3 Extract from Architectural Plans – First Floor Plan (Source: Architectural Plans, Sam Crawford Architects, dated 8/12/2022)



Figure 4 Extract from Architectural Plans – Photomontage (Source: Architectural Plans, Sam Crawford Architects, dated 8/12/2022)

3 Existing Site & Locality

3.1 Existing Site and Immediately Adjoining Development

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



Figure 5 Location Plan (Source: SIX Maps)

The site is currently vacant and only contains trees and minor landscaping elements (refer to photographs at **Figure 6 & Figure 7**).



Figure 6 Development Site – Kelloway Avenue (Source – LAHC November 2022)



Figure 7 Development Site – Kelloway Avenue (Source – LAHC November 2022)

The property immediately to the west (1 Kelloway Avenue) contains a single-storey weatherboard with corrugated iron roof dwelling house (refer photograph at **Figure 8**). The property to the east (7 Kelloway Avenue) contains a single-storey weatherboard dwelling house with tile roof (refer to photograph at **Figure 9**).



Figure 8 Adjoining development – 1 Kelloway Avenue (Source – Google Earth)



Figure 9 Adjoining development – 7 Kelloway Avenue (Source – Google Earth)

3.2 Site Description

Copies of the Section 10.7(2) & (5) Planning Certificates (Nos 20223549 and 20223551) dated 7 June 2023 are provided at **Appendix F**.

The site has a total area of 1,274m², a frontage to Kelloway Avenue of 35.35m, side (eastern) boundary of 39.59m, side (western) boundary of 40.11m and rear (southern) boundary of 28.955m (Detail and Survey Plan in **Appendix D**).

The site rises from the north-eastern corner of the site fronting Kelloway Avenue to the south-western corner by approximately 2.63m.

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

Water, sewer, electricity, gas and telephone facilities are available to the site (Detail and Survey Plan for the location of available services at **Appendix D**).

There are no encumbrances on title, Section 10.7 certificates or indicated on the Detail and 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 interspersed with more recent 2-storey dwelling houses (refer to photographs at **Figure 10** and **Figure 11**).



Figure 10 recent double storey development at 74 Old Hume Highway, Camden (West of the Site) (Source – Google Earth)



Figure 11 recent double storey development at 89 Old Hume Highway, Camden (West of the Site) (Source – Google Earth)

There are numerous bus stops located within proximity of the site. Two bus stops are located on Old Hume Highway 85m and 175m walking distance west of the site. These stops are serviced by Route 49, 894, 894X, 895 and 900 providing connections to train stations and the surrounding area. An additional bus stop (service 895) is located on Belgenny Avenue 200m away from the site to the east. The site is located within the distance and is serviced by the bus frequency to be classified as an “accessible area” as defined within the Housing SEPP.

The area, although residential in nature, also comprises a number of other land uses including a school, child care centres, aged care facility, public open space areas and churches.

4 Zoning and Permissibility

The site is zoned R2 Low Density Residential under *Camden Local Environmental Plan 2010* (Camden LEP 2010). The proposed development is defined as 'boarding house' which under the provisions of Camden LEP 2010 is a form of "Residential development" and is prohibited in the R2 zone.

The proposed activity is permitted on the site under the provisions of Chapter 2, Part 2, Division 3, Section 28 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) and can therefore be carried out by the NSW Land and Housing Corporation (LAHC) without consent as it does not result in more than 12 boarding rooms.



Figure 12 Land zoning map (Source: Camden LEP 2010)

The relevant objective of the R2 zone, as set out in Camden LEP 2010 is:

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

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

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>	No effect, as the site and surrounding areas are not within a wilderness area (within the meaning of the <i>Wilderness Act 1987</i>).

5.1.2 Biodiversity Conservation Act 2016 (BC Act)

Part 7 of the BC Act sets out the test for determining whether a proposed development or activity is likely to significantly 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 neither be a key threatening process and the land is not part of or in the vicinity of any declared area of outstanding biodiversity value.

5.1.3 Other Acts

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

5.1.4 Environmental Planning and Assessment Regulation 2021

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

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

Table 2 Compliance with Section 171 of the EP&A Regulations 2021

Factors to be taken into account concerning the impact of an activity on the environment.	Comment
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.	No specific guidelines This does not include guidelines such as the Seniors Living Urban Design Guidelines, that are in force under other legislation or instruments.
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.	Yes - Department of Planning and Environment issued "Guidelines for Division 5.1 assessments" made under Section 170 of the EP&A Regulation 2021.

Factors to be taken into account concerning the impact of an activity on the environment

Guidelines for Division 5.1 assessments require the following Environmental factors to be taken into account:	Relevant?	Impact Assessment		
	YES/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;	NA			
(f) impact on the habitat of protected animals (within the meaning of Biodiversity Conservation Act 2016);	NA			
(g) endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air;	NA			
(h) long-term effects on the environment;	Yes		x	
(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;	NA			
(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 2]	NA			
(q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	Yes – discussed below in subsection 5.1.5 below		x	
(r) other relevant environmental factors.	Yes – discussed in Section 7		x	

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

Note 2: 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 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

Camden - Local Strategic Planning Statement

The Camden Local Strategic Planning Statement (LSPS) was released in March 2020 and is a 20-year plan emphasising land use, transport and sustainability objectives for the Camden Local Government Area. The LSPS contains 21 Local Priorities to guide the 20-year plan.

Notably, Local Priority L1 seeks to promote housing choice and affordability for Camden's population. The proposed development will be contributing 12 boarding rooms to the housing supply in the Camden LGA.

The proposed development, of 12 boarding rooms contributes to the objectives of the Camden LSPS and will increase the provision of housing supply to support the population. The Camden Local Strategic Planning Statement is available on the [Camden Council Strategic Policies webpage](#).

Connecting Camden Community Strategic Plan 2036

The Connecting Camden Community Strategic Plan 2036 was adopted by Council on the 14 June 2022. The plan outlines key planning, investment, operational and leadership decisions to 2036. The plan includes five key directions being Welcoming, Liveable, Prosperous, Balanced and Leading. A key objective is to ensure that homes are well planned, delivered and maintained to create high quality urban environments.

The proposed development, of 12 boarding units is not in conflict with the Connecting Camden Community Strategic Plan 2036 and will provide new housing within the LGA.

5.1.6 Activities in Catchments (Section 171A)

The site is located within a regulated catchment, namely the Hawkesbury Nepean Catchment, as defined in Part 6.2 of the *State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP)*.

LAHC, as a determining authority, when considering the likely impact on the environment of an activity proposed to be carried out in a regulated catchment, must take into account the controls on development set out in Part 6.2, Division 2 of the Biodiversity and Conservation SEPP.

As assessment of these controls on development is provided in Table 6 of this REF. The assessment concludes that the proposed activity is unlikely to significantly impact the Hawkesbury Nepean Catchment.

5.1.7 State Environmental Planning Policy (Housing) 2021

The HSEPP, Chapter 2, Part 2, Division 3, Section 28 applies to development for the purposes of boarding house in the R2 Low Density Residential Zone. Section 29 outlines that boarding houses are permitted without development consent if the development complies with the development standards specified within Section 24(2) and 25(1), the relevant authority considers the matters set out in section 25 (2) and the development will not result in a building with a height of more than 9m and the boarding house will not have more than 12 boarding rooms.

Table 3 below demonstrates compliance with the relevant provisions of Division 3 of the HSEPP.

Table 3 Compliance with relevant provisions under sections Chapter 2, Part 2, Division 3 of the HSEPP for 'Boarding houses permitted without development consent' carried out by LAHC and Chapter 2, Part 2, Division 2.

Provision	Compliance
<p>28 (1) – This Division applies to development for the purposes of boarding houses on land –</p> <p>(a) on which development for the purposes of boarding houses is permitted with consent under another environmental planning instrument, or</p> <p>(b) in Zone R2 Low Density Residential or an equivalent land use zone.</p>	<p>Compliant.</p> <p>The proposal is compliant with (b) as the site is within the R2 Low Density Zone.</p>
<p>2) This Division does not apply to development for the purposes of boarding houses on land in Zone R2 Low Density Residential or an equivalent land use zone unless –</p> <p>(a) for land in the Greater Sydney region – the land is within an accessible area, or</p> <p>(b) otherwise – all or part of the boarding house is within 400m walking distance of land in Zone E1 Local Centre, Zone MU1 Mixed Use, Zone B2 Local Centre or Zone B4 Mixed Use, or an equivalent land use zone.</p>	<p>Compliant.</p> <p>The proposal is compliant as the site is within an accessible area. The site is located within Greater Sydney, is within 400m walking distances of bus stops providing a regular bus service, and is well serviced by existing road infrastructure providing connections to the surrounding context.</p>
<p>29(1) Development to which this Division applies may be carried out by or on behalf of a relevant authority without development consent if –</p> <p>(a) the development complies with the development standards specified in sections 24(2) and 25(1), and</p> <p>(b) the relevant authority considers the matters set out in section 25 (2), and</p> <p>(c) the development will not result in a building with a height of more than 9m, and</p> <p>(d) for development on land in Zone R2 Low Density Residential or an equivalent land use zone – the boarding house will not have more than 12 boarding rooms.</p>	<p>Compliant.</p> <p>The proposal is compliant with section 24(2) and 25(1). The proposal is compliant with section 25 (2). The proposal will not result in a building with a height more than 9m. The proposal is on land within the R2 Low Density Residential land use zone and will not have more than 12 boarding rooms.</p>

Provision	Compliance
<p>24(2) The following are non-discretionary development standards in relation to the carrying out of development to which this Division applies —</p> <p>(a) for development in a zone in which residential flat buildings are permitted — a floor space ratio that is not more than —</p> <p>(i) the maximum permissible floor space ratio for residential accommodation on the land, and</p> <p>(ii) an additional 25% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of the boarding house,</p> <p>(b) if paragraph (a) does not apply — a floor space ratio that is not more than the maximum permissible floor space ratio for residential accommodation on the land,</p>	<p>Compliant.</p> <p>Residential flat buildings are not permitted within the R2 low density zone.</p> <p>The Camden LEP 2010 does not provide a FSR for the site. The Camden DCP 2019 does not provide a FSR for the site. Notwithstanding, the DCP does set site coverage controls for residential types. The highest order residential development permitted within the R2 zone is Seniors Housing. The DCP controls outline that the controls for multi-dwelling housing or residential flat buildings should be applied to Seniors Housing, as appropriate to the proposed development. Controls relating to multi-dwelling housing are considered to be the most appropriate to apply to the proposed boarding house, but notwithstanding this, the site coverage requirements are consistent for both multi-dwelling and residential flat buildings, imposing a maximum 50%.</p> <p>The proposed site coverage for the boarding house is 28%, and complies with this control. On this basis, clause 24(2) is complied with.</p>
<p>(c) for development on land in Zone R2 Low Density Residential or Zone R3 Medium Density Residential — the minimum landscaping requirements for multi dwelling housing under a relevant planning instrument,</p>	<p>Compliant.</p> <p>The Camden LEP 2010 does not stipulate a minimum landscape area. However, the Camden DCP 2019 sets a minimum 30% landscaped area on the site for multi-dwelling housing.</p> <p>The proposed landscaped area for the boarding house is 30%, which includes only landscaped areas having a minimum 1.5m. Clause 24(2)(c) is complied with.</p>
<p>i(d) for development on land in Zone R4 High Density Residential — the minimum landscaping requirements for residential flat buildings under a relevant planning instrument,</p>	<p>Not applicable.</p> <p>The site is not within a R4 High Density Zone.</p>
<p>(e) at least 3 hours of direct solar access provided between 9am and 3pm at mid-winter in at least 1 communal living area,</p>	<p>Compliant.</p> <p>The proposal receives 3 hours direct solar access into the communal living area.</p>
<p>(f) for a boarding house containing 6 boarding rooms —</p> <p>(i) a total of at least 30m² of communal living area, and</p> <p>(ii) minimum dimensions of 3m for each communal living area,</p>	<p>Not applicable.</p>
<p>g) for a boarding house containing more than 6 boarding rooms —</p> <p>(i) a total of at least 30m² of communal living area plus at least a further 2m² for each boarding room in excess of 6 boarding rooms, and</p> <p>(ii) minimum dimensions of 3m for each communal living area,</p>	<p>Compliant.</p> <p>The proposal provides the following:</p> <ul style="list-style-type: none"> Minimum. 30m² + 12m² per room in excess of 6 rooms Based on 12 rooms= 30m² + 12m²= total 42m² Minimum dimension = 3m.

Provision	Compliance
<p>(h) communal open spaces —</p> <p>(i) with a total area of at least 20% of the Site area, and</p> <p>(ii) each with minimum dimensions of 3m,</p>	<p>Compliant.</p> <p>The proposal provides the following:</p> <ul style="list-style-type: none"> Minimum. 20% of Site area $20\% \times 1274 = 254.8\text{m}^2$ Minimum dimension = 3m.
<p>(i) if a relevant planning instrument does not specify a requirement for a lower number of parking spaces — at least the following number of parking spaces —</p> <p>(i) for development on land within an accessible area — 0.2 parking spaces for each boarding room,</p> <p>(ii) otherwise — 0.5 parking spaces for each boarding room,</p>	<p>Compliant.</p> <p>The proposal provides the following: $12 \times 0.2 = (2.4) = 3$ car spaces.</p>
<p>(j) if a relevant planning instrument specifies a requirement for a lower number of parking spaces — the lower number specified in the relevant planning instrument.</p>	<p>Not applicable.</p>
<p>(25)(1) - Development consent must not be granted under this Division unless the consent authority is satisfied that —</p> <p>(a) no boarding room will have a gross floor area, excluding an area, if any, used for the purposes of private kitchen or bathroom facilities, of more than 25m^2, and</p>	<p>Compliant.</p> <p>The boarding house does not provide any boarding rooms which exceed 25m^2 excluding kitchen and bathroom areas.</p>
<p>(b) no boarding room will be occupied by more than 2 adult residents, and</p>	<p>Compliant.</p> <p>No boarding room will be occupied by more than 2 adult residents.</p>
<p>(c) adequate bathroom, kitchen and laundry facilities will be available within the boarding house for the use of each resident, and</p>	<p>Compliant.</p> <p>Adequate bathroom, kitchen and laundry facilities are available within the boarding house rooms for use of each resident.</p>
<p>(d) for a boarding house on land in Zone R2 Low Density Residential or an equivalent land use zone — the boarding house will not have more than 12 boarding rooms, and</p>	<p>Compliant.</p> <p>The proposal is compliant with (d) as the site is within the R2 Low Density Zone and will not have more than 12 boarding rooms.</p>
<p>(e) for a boarding house on land in a business zone — no part of the ground floor of the boarding house that fronts a street will be used for residential purposes unless another environmental planning instrument permits the use, and</p>	<p>Not applicable.</p> <p>The site is not within a business zone.</p>
<p>(f) for a boarding house containing at least 6 boarding rooms — the boarding house will have at least 1 communal living area, and</p>	<p>Compliant.</p> <p>One communal living area is proposed</p>
<p>(g) the minimum lot size for the boarding house is not less than —</p> <p>(i) for development on land in Zone R2 Low Density Residential — 600m^2, or</p> <p>(ii) for development on other land — 800m^2.</p> <p>(iii) (Repealed)</p>	<p>Compliant.</p> <p>The site has a total lot size of 1274m^2.</p>

Provision	Compliance
<p>(h) each boarding room has a floor area, excluding an area, if any, used for the purposes of private kitchen or bathroom facilities, of at least the following –</p> <p>(i) for a boarding room intended to be used by a single resident – 12m²,</p> <p>(ii) otherwise – 16m², and</p>	<p>Compliant.</p> <p>The boarding rooms exceed the minimum requirements of 12m².</p>
<p>(i) the boarding house will include adequate bicycle and motorcycle parking spaces.</p>	<p>Compliant.</p> <p>The boarding house includes 4 bicycle and 1 motorcycle parking space which is considered appropriate.</p>
<p>(2) Development consent must not be granted under this Division unless the consent authority considers whether –</p> <p>(a) the design of the boarding house will be compatible with –</p> <p>(i) the desirable elements of the character of the local area, or</p> <p>(ii) for precincts undergoing transition – the desired future character of the precinct, and</p>	<p>Compliant.</p> <p>The design of the boarding housing is compatible with the character of the local area and provides a positive and modern addition.</p>
<p>(b) the front, side and rear setbacks for the boarding house are not less than –</p> <p>(i) for development on land in Zone R2 Low Density Residential or Zone R3 Medium Density Residential – the minimum setback requirements for multi dwelling housing under a relevant planning instrument,</p> <p>(ii) for development on land in Zone R4 High Density Residential – the minimum setback requirements for residential flat buildings under a relevant planning instrument,</p>	<p>Compliant.</p> <p>The proposal provides the following setbacks in respect of the Camden DCP 2019, Part 4.6 MDH Table 4-7:</p> <ul style="list-style-type: none"> • Front Setback: 9.0m average <ul style="list-style-type: none"> – Western Block: 8m – Eastern Block: 9.1m • Side Setback: <ul style="list-style-type: none"> – 4m Eastern boundary – 5.5m Western boundary • Rear Setback: <ul style="list-style-type: none"> – 13.5m (ground) – 12m (1st floor)
<p>(c) if the boarding house has at least 3 storeys – the building will comply with the minimum building separation distances specified in the Apartment Design Guide.</p>	<p>Not applicable.</p> <p>The boarding house is not 3 storeys.</p>
<p>(d), (e) (Repealed)</p>	<p>Not applicable.</p>

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 4** below.

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

Goals	Principles	Comment - Discussion on how the design responds to the principles:
<i>Wellbeing</i>	<ul style="list-style-type: none"> • Healthy environments • Good for tenants • Quality homes 	<p>The proposal includes a communal room and high-quality landscaping and outdoor areas. The boarding rooms have been designed to ensure that passive surveillance is provided balanced with resident privacy. Safe and direct access is provided from the car park area to the entries of the building. The proposal is compliant with BASIX requirements (Appendix K).</p>
<i>Belonging</i>	<ul style="list-style-type: none"> • Mixed tenure • Good shared and public spaces • Contribute to local character 	<p>The proposal provides an easily identifiable walkway to the entrance of the building. The proposal provides attractive landscaping along the street frontages and setbacks. The development is generally small in scale which minimises the resident density and impact on local character. The building design and landscaping integrates with the surrounding residential neighbourhood.</p>
<i>Value</i>	<ul style="list-style-type: none"> • Whole of lifecycle approach • Sustainability and resilience • Make every dollar count 	<p>The proposal has provided low maintenance landscape species. The proposal has provided durable building materials to increase sustainability and resilience. The orientation of the boarding rooms, private and communal open space area has been designed to optimise natural light to these areas.</p>
<i>Collaboration</i>	<ul style="list-style-type: none"> • A good partner • Sustainability and resilience • Make every dollar count 	<p>The proposal is of a scale and character that assists with place making, by ensuring integration with the surrounding development. Collaboration and consultation with key stakeholders was also incorporated at critical design milestones.</p>

5.1.9 Land and Housing Corporation Design Requirements 2023

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

5.1.10 Other State Environmental Planning Policies

Table 5 below outlines applicability of, and compliance with, other State and Environmental Planning Policies (SEPPs).

Table 5 Compliance with other applicable State and Environmental Planning Policies

State Environmental Planning Policy	Applicability
SEPP (Sustainable Buildings) 2022.	<p>As of 1 October 2023, the SEPP (Building Sustainability Index: BASIX) 2004 was repealed and replaced by the SEPP (Sustainable Buildings) 2022.</p> <p>Certificate has been obtained for the development proposal, as required under Chapter 2 and Schedule 1 the Sustainable Buildings SEPP (refer to Appendix K).</p>
SEPP (Transport and Infrastructure) 2021	<p>The Transport and Infrastructure SEPP provides planning controls relating to development for the purposes of essential services infrastructure (hospitals, roads, water supply, telecommunications and electrical networks), educational establishments and child care facilities and major infrastructure corridors.</p> <p>The site is located within a proximity to a State Classified Road, being the Camden Bypass. Appendix T includes the traffic noise impact assessment and concludes that building construction to Category 2 levels under AS3671 will result in the proposed boarding house achieving compliance with this SEPP in regard to road noise impacts on residential development.</p> <p>The proposal is not defined as traffic generating development.</p>
SEPP (Biodiversity and Conservation) 2021	<p>This Biodiversity and Conservation SEPP provides planning controls related to conservation and management, to ensure protection of the natural environment.</p> <p>There are 19 trees located within the site and the proposal includes the removal of 10 of those trees. As the development proposes tree removal, the provisions of the SEPP related to vegetation clearing do apply. Clause 2.6(1) of this SEPP requires a permit from Council for clearing of vegetation required under the policy.</p> <p>Clause 6 of Housing SEPP specifies that development permitted without consent may be carried out without any other 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> <p>Hawkesbury Nepean Catchment: The site is located within a regulated catchment, namely, the Hawkesbury Nepean Catchment. Accordingly, the controls for development set out in Division 2 of Part 6.2 of the Biodiversity and Conservation SEPP apply to the activity. Under Section 171A(1) of the EP&A Regulation, LAHC as determining authority for the activity, when considering the likely impact on the environment, must consider <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>, sections 6.6(1), 6.7(2), 6.8(2) and 6.9(2).</p> <p>Clause 6.6 Water quality and quantity This clause requires the consent authority to consider whether the development will: Have a neutral or beneficial effect on the quality of water entering a waterway</p>

State Environmental Planning Policy	Applicability
	<p>Have an adverse impact on water flow in a natural waterbody Increase the amount of stormwater run-off from a site, and Incorporate on-site stormwater retention, infiltration or reuse.</p> <p>The consent authority is also required to assess the impact of the development</p> <ul style="list-style-type: none"> on the level and quality of the water table; the cumulative environmental impact of the development on the regulated catchment: and whether the development makes adequate provision to protect the quality and quantity of ground water. <p>Further this clause also requires that consent is not issued unless the consent authority is satisfied the development ensures:</p> <ul style="list-style-type: none"> the effect on the quality of water entering a natural waterbody will be as close as possible to neutral or beneficial, and the impact on water flow in a natural waterbody will be minimised. <p><u>Comment:</u> Stormwater will be collected via a series of stormwater pits and gutters on the site connected to a 30m³ underground on-site detention tank which drains to the Kelloway Avenue frontage. Similarly, the roof water is connected to this underground ground tank.</p> <p>Identified Requirement (No. 13) recommends that sediment control measures be implemented during construction in accordance with Council requirements and/or the guidelines contained in the Blue Book Managing Urban Stormwater: Soils and Construction (4th edition, Landcom, 2004).</p> <p>Identified Requirements (Nos 6 and 39) are applied to the Activity Determination recommending that stormwater management of the activity is designed in accordance with Camden Council's technical guidelines and policies.</p> <p>Clause 6.7 Aquatic ecology</p> <p>This clause requires the consent authority to consider whether the development:</p> <ul style="list-style-type: none"> will have a direct, indirect or cumulative adverse impact on terrestrial, aquatic or migratory animals or vegetation, involves the clearing of riparian vegetation and, if so, whether the development will require either a controlled activity approval under the <u>Water Management Act 2000</u>, or a permit under the <u>Fisheries Management Act 1994</u>, will minimise or avoid the erosion of land abutting a natural waterbody, or the sedimentation of a natural waterbody, or will have an adverse impact on wetlands that are not in the coastal wetlands and littoral rainforests area,

State Environmental Planning Policy	Applicability
	<ul style="list-style-type: none"> includes adequate safeguards and rehabilitation measures to protect aquatic ecology, if the site adjoins a natural waterbody – whether additional measures are required to ensure a neutral or beneficial effect on the water quality of the waterbody. <p>Further this clause also requires that consent is not issued unless the consent authority is satisfied the development ensures:</p> <ul style="list-style-type: none"> that the direct, indirect or cumulative adverse impact on terrestrial, aquatic or migratory animals or vegetation will be kept to the minimum necessary for the carrying out of the development, the development will not have a direct, indirect or cumulative adverse impact on aquatic reserves, if a controlled activity approval under the <i>Water Management Act 2000</i> or a permit under the <i>Fisheries Management Act 1994</i> is required in relation to the clearing of riparian vegetation – the approval or permit has been obtained, the erosion of land abutting a natural waterbody or the sedimentation of a natural waterbody will be minimised, the adverse impact on wetlands that are not in the coastal wetlands and littoral rainforests area will be minimised. <p><u>Comment:</u> The subject site is not located on riparian land and will not require a controlled activity permit. The site does not adjoin a natural waterbody. Suitable erosion and sedimentation controls will be required to minimise erosion and maintain water quality, as discussed above. The proposed development includes planting of suitable native indigenous vegetation. In addition, the scale and nature of the activity, together with its location, is unlikely to have significant impacts upon aquatic ecology.</p> <p>Clause 6.8 Flooding</p> <p>This clause relates to flood liable land.</p> <p><u>Comment:</u> The site is not located on flood liable land.</p> <p>Clause 6.9 Recreation and public access</p> <p>This clause relates to development on recreational land and public access to natural water bodies and foreshores</p> <p><u>Comment:</u> The proposed activity will not impact recreational land uses or alter public access to recreational land or foreshores.</p>
SEPP (Resilience and Hazards) 2021	<p>The Resilience and Hazard SEPP provides provisions for development in the coastal zone, management of hazardous and offensive development and remediation of contaminated land.</p> <p>Section 4.6 of this SEPP requires the consent authority to consider whether land is contaminated prior to granting development consent.</p>

State Environmental Planning Policy	Applicability
	<p>The site is located within a developed residential area of Camden and a review of aerial imagery of the site identifies that the site had been occupied by dwelling houses between 1970 to 2022. In July 2022 the dwelling houses were demolished. The Section 10.7 Planning Certificates have not identified the site as potentially contaminated. Furthermore, consideration of the draft Contaminated Land Planning Guidelines (draft Guidelines) prepared by the Department of Planning and Environment and the Environment Protection Authority is at Table 12 within this report.</p> <p>A recommended Identified Requirement No.17 requires implementation of management measures in the event of unexpected finds of contamination during construction works.</p>

5.2 Local Planning Controls

5.2.1 Camden Local Environmental Plan 2010 (CLEP 2010)

Compliance with the relevant provisions / development standards set out in the CLEP 2010 is demonstrated in **Table 6** below.

Table 6 Camden Local Environmental Plan 2010

Relevant Provisions / Development Standards			
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)	Compliant. Maximum building height (measured in accordance with the LEP definition) is 8.8m.
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 not mapped as containing a maximum floor space ratio on the Floor Space Ratio Map.	N/A The Site is not mapped as containing a maximum floor space ratio on the Floor Space Ratio Map. Proposed FSR is 0.45:1.

5.2.2 Camden Development Control Plan 2019

Camden Development Control Plan 2019 (CDCP 2019) does not include development controls relating to boarding houses, so the controls contained within the multi-dwelling housing chapter have been relied upon as this is the built form that is most comparative to the proposed boarding house. The setback, landscaped area and site coverage controls are the most relevant controls which has been considered in the design and development of this proposal. The setback controls are tabulated at Error! Reference source not found.7 below.

Table 7 Camden Development Control Plan 2019

Camden Development Control Plan 2019

Setbacks

Clause	Requirement	Proposed
Part 4.6 MDH	<p><u>Front setbacks</u> 4.5m</p> <p>or</p> <p>In established areas, the front setback must be consistent with the prevailing setback established by adjacent development. The prevailing setback is calculated as being the average distance of the setbacks of the nearest two dwelling houses having a boundary with the same primary road.</p> <p><u>Side setbacks</u> Ground floor: 0.9m</p> <p>Upper floor: 4m</p> <p><u>Rear setbacks</u> Ground floor: 4m</p> <p>Upper floor: 6m</p>	<p>Compliant.</p> <p>The proposal provides the following setbacks in respect of the Camden DCP 2019, Part 4.6 MDH Table 4-7:</p> <p><u>Front Setback:</u> 9.0m average</p> <ul style="list-style-type: none"> Western Block: 8m Eastern Block: 9.1m <p><u>Side Setback:</u></p> <ul style="list-style-type: none"> 4m Eastern boundary 5.5m Western boundary <p><u>Rear Setback:</u></p> <ul style="list-style-type: none"> 13.5m (ground) 12m (1st floor)

Site Coverage

Part 4.6 MDH	50% maximum	<p>Compliant</p> <p>29% site coverage is proposed.</p>
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Landscaped Area

Part 4.2.6 General Residential Development Controls	<p>A minimum 30% of the site must consists of landscaped area.</p> <p>Areas less than 1.5m in width are not to be included in the calculation of landscaped area.</p> <p>A minimum of 40% of the front setback (as measured from the building line) must be landscaped area.</p>	<p>Compliant</p> <p>30% landscaped area is proposed. Note: Areas with a width of less than 1.5m have been excluded from this calculation.</p> <p>Approximately 40% of the front setback will be provided as landscaped area.</p>
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6 Notification, Consultation and Consideration of Responses

6.1 Council Notification

In accordance with the Housing SEPP requirements, Camden Council was notified of the development by letter dated 13 June 2023. The notification response period formally closed on 20 July 2023 and Council responded to the notification by letter dated 26 July 2023. A full copy of Council's submission is contained within **Appendix G** and their comments have been extracted in **Table 8** below. A response is provided in relation to the matters raised in Council's letter and where appropriate, these matters have been addressed in the identified requirements in the **Activity Determination**.

Table 8 Issues raised in Council submission

Issues raised	Response
<p><i>The plans do not identify another street pit located at the western corner of the Site (please see image below), which is adjacent to the proposed driveway.</i></p> <p><i>The driveway will need to demonstrate that it is 1 metre minimum clear from the street pit.</i></p>	<p>The Site Plan (Plan No A105 Rev 01) has been amended so that the driveway achieves a 1m minimum clearance from the stormwater street pit located at the street frontage, as requested by Council.</p> <p>An Identified Requirement has been included (No.62) which requires that all Architectural, Landscape and Civil Plans be updated to reflect the 1 metre minimum clearance from the driveway from the stormwater street pit located at the street frontage as per the Site Plan (Plan No A105 Rev 01).</p>
<p><i>The proposed pipe diameter connecting to the eastern street pit needs to be a minimum 375mm diameter pipe within the road verge with a pit located wholly within the boundary connecting the 225mm pipe from within the site.</i></p>	<p>Following Council's comment on this matter, LAHC has updated the Civil Plans at Appendix C so that the pipe within the street verge is a minimum 375mm diameter and that there is a pit to pit connection from the site to the street.</p>

6.2 Notification of Occupiers of Adjoining Land and Other Persons

Advice was sought from Council regarding additional persons or property that should be notified of the development via an email dated 13 June 2023. Council provided an email response on 14 June 2023 advised that the notification map be consistent with Council's Community Participation Plan and that additional properties requested by Council be added. **Figure 14** illustrates the properties which were notified of the development.

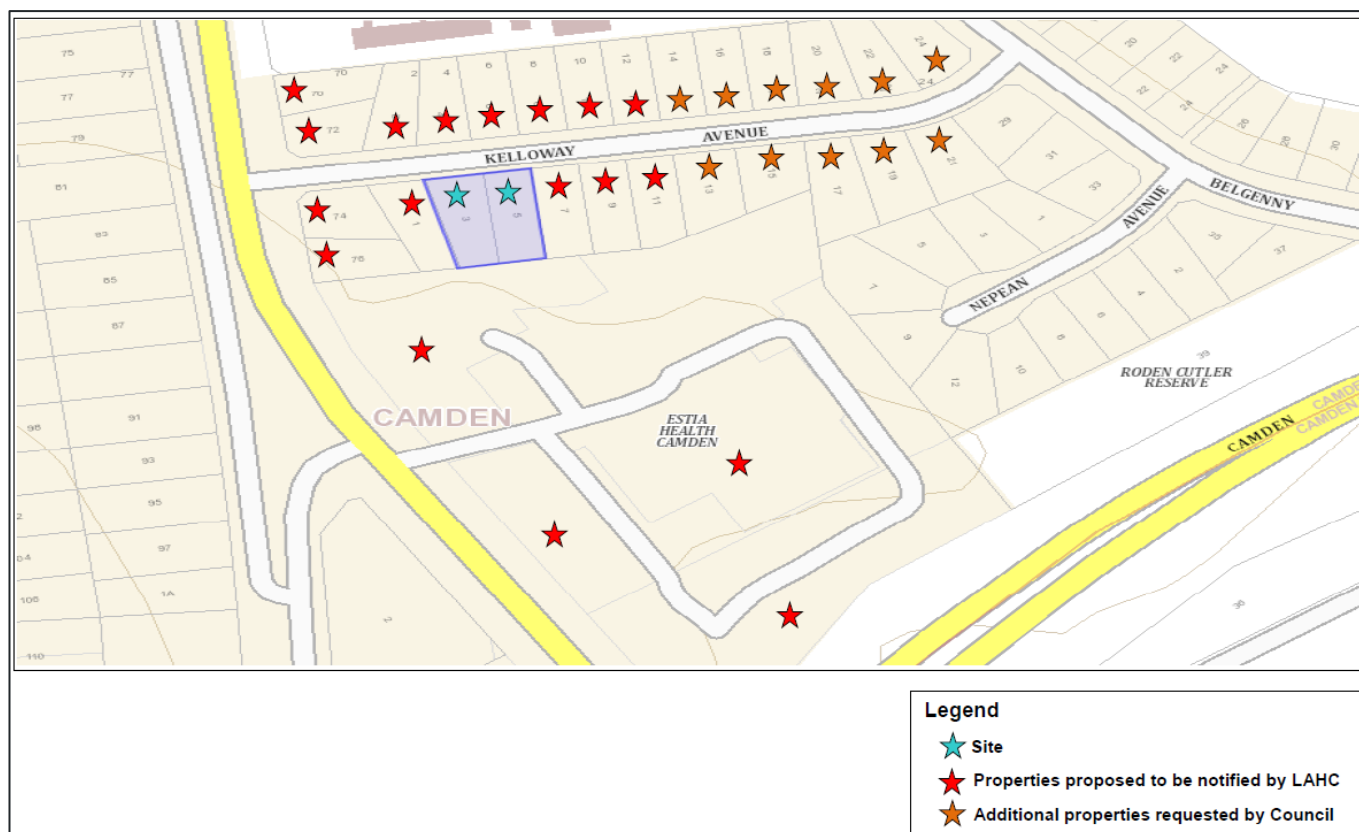


Figure 14 Map of Properties Notified of the Proposed Development (Source: LAHC)

Under section 43(1)(b) of Housing SEPP occupiers and owners of adjoining land, as identified in the above map, were notified of the proposed development activity by letter dated 26 June 2023. Copies of the notification letters are provided at **Appendix G**.

The notification response period formally closed on 20 July 2023 and 1 submission was received, with the matters raised outlined in **Table 9**.

Table 9 Issues raised by adjoining owners / neighbours

Issues raised	LAHC Response
Concern about the on-site parking	The proposed development has been designed in accordance and compliance with legislative requirements for the number of car parking spaces that need to be provided.
Concern with local traffic and parking impacts	<p>A Traffic and Parking Impact Assessment Report (Appendix S) has been prepared to support the proposed development activity.</p> <p>The assessment has concluded that the proposed development will result in a minor increase in the trip generation rate at peak hours and accordingly will not significantly impact traffic on the surrounding road network.</p> <p>The proposed development provides 3 car parking spaces which includes 1 accessible car space which satisfies the Housing SEPP and therefore the Camden Council DCP Parking requirements (as the DCP requests compliance with the applicable SEPP for boarding house developments).</p>

6.3 Notification of Specified Public Authorities

The development is a “boarding house” under section 29 of the Housing SEPP. As required by section 30(1) 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 vacant sites are located within an established residential area generally supporting single detached dwelling houses, however, it is recognised that a number of other developments such as Camden South Public School, Camden Baptist Church, Estia Health (Age Care Facility) and public reserves make up the context of the area. The proposed development has a similar choice of materials as the existing development in the neighborhood, including red brick and weather board cladding. The proposed development includes no front fence which is consistent with other developments along Kelloway Avenue.

Currently, there is a low level of transition from low density housing to 2-storey density development. It is anticipated that the proposed development may act as a catalyst for more contemporary and 2-storey development in the suburb of Camden. The 2-storey design, siting, layout and landscape setting of the proposed development aligns with that of emerging development in the locality.

The bulk and scale of the proposed development is compatible with the future character of the neighbourhood and will deliver a built form outcome consistent with the planning controls for the locality and character statement.

The choice of materials and proposed landscaping will result in a positive contribution to the neighborhood character.

Mitigation Measures

No additional mitigation measures are required.

7.2 Bulk and Density

The proposed development is consistent with the desired future character bulk and scale in the locality of Camden. The 2-storey building incorporates appropriate setbacks distinguished by a variety of articulation features, external finishes and materials to reduce the visual bulk of the development and detailed landscaping. The development is split into two cores of a southern and northern block that is connected by common circulation spaces. The design has incorporated large setbacks from Kelloway Avenue and is designed with suitable façade articulation and roof form to minimise bulk and scale.

The proposal has a floor space ratio (FSR) of 0.45:1 and a maximum height of 8.8m which results in a 2-storey built form that is sympathetic to the surrounding context and is an appropriate response to the desired future character envisaged for the R2 Low Density Residential, zone which seeks to provide for the housing needs of the community within a low density residential environment.

The bulk and density of the proposed development does not give rise to any adverse solar or overshadowing impacts on the surrounding properties. Overall, the FSR and height is considered to be appropriate, and the setbacks are reasonable. The proposal will suitably increase housing density which is consistent with State and regional strategies and the development controls applying to the site.

Mitigation Measures

No mitigation measures are required.

7.3 Streetscape

The architectural style of the proposed development activity is compatible with the form of the surrounding locality and desired future character for the area. The street façade is divided into a number of distinct elements, with substantial landscaping resulting in a softened streetscape appearance. In addition, there will be no adverse visual impact arising from the car parking design as all hardstand car parking spaces are located behind the building and are not visible from the Kelloway Avenue.

The proposed development will replace ageing housing stock which has been since demolished due to it reaching the end of its economic life with a new contemporary residential development. The built form has been designed to address the street frontages through incorporation of street facing windows and doors, as well as courtyards and balconies within the front setback, improving casual surveillance of the street.

Mitigation Measures

No additional mitigation measures are required.

7.4 Visual Impact

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

The proposed development will make a positive contribution to the residential streetscape through construction of new contemporary development that responds to the site context and neighbourhood character. The proposed articulation, diverse mix of materials and a neutral colour palette will assist with the overall aesthetic of the proposal positively contributing to the neighborhood character.

The Kelloway Avenue street verge retains a significant tree (T10) with a height of approximately 20m, and three other smaller on-site trees within the front setback (T13, T14 and T15) are retained. The landscaping proposed in the front setback incorporates a mix of shrubs including *Syzygium australe*, *Melaluca* 'Claret Tops', *Callistemon* 'White Anzac' and *Callistemon viminalis*. The overall landscape plantings in the front, rear and side boundaries of the site will add to the long-term visual amenity of the surrounding properties and improve the appearance of the site and development when viewed from Kelloway Avenue.

Mitigation Measures

No additional mitigation measures are required.

7.5 Privacy

A high level of internal and external privacy is maintained by the proposed development activity through a range of measures including careful and considered landscaping, new 0.5-1.8m high fencing, adequate built form setbacks and strategic placement of windows so as to avoid direct overlooking of neighbours. In particular:

- Balconies associated with rooms 7, 8, 9, 10 are orientated toward Kelloway Avenue with landscaping, including trees and shrubs, proposed within the front setback to improve streetscape amenity and privacy for future residents.
- Balconies associated with rooms 11 and 12 are well setback from the rear southern and side western boundary. Landscaping is provided across the rear boundary to improve amenity and privacy for future residents.
- No balconies are provided within the side boundaries.

Mitigation Measures

No additional mitigation measures are required.

7.6 Solar Access

The design and siting of the proposed development will provide adequate daylight access to the living areas and private open space of each boarding room.. 8 out of the 12 boarding rooms have a northern orientation. On balance, an adequate level of solar access is achieved, in the context of the use of the site as a boarding house.

The submitted Architectural Plans (**Appendix A**) demonstrates that the communal living area and communal open space receives 3 hours direct solar access, meeting the requirements of the SEPP Housing with regards to communal areas.

Mitigation Measures

No additional mitigation measures are required.

7.7 Overshadowing

The shadow diagrams confirm the development has been designed to minimise overshadowing to surrounding development. Shadow diagrams confirm the proposed development will not generate unacceptable shadow impacts to living areas and private open space of dwellings on adjoining sites.

At 9am during the midwinter, shadows generated by the proposed development have a minor impact on the eastern wall within the adjoining dwelling at 1 Kelloway Avenue. Two windows are contained within this eastern wall which serve habitable rooms. These shadow impacts are considered minor and not unreasonable as by approximately 10am, the dwelling at 1 Kelloway Avenue will have unobstructed solar access for the remainder of the day.

At 2pm during the midwinter solstice, some additional overshadowing to the rear garden of 7 Kelloway Avenue. The shadow does not fall upon the façade of this property, and given that the majority of the rear garden of 7 Kelloway Avenue remains unaffected, the impacts are not considered to be material.

The shadow diagrams detail that at 3pm during the midwinter solstice, some additional overshadowing occurs to the property to the rear (south) of the property. The overshadowing is minor, falling predominantly within the existing shadow lines of the dividing fence line and will not materially impact the private open space or façade of the adjoining properties to the south.

No other overshadowing impacts arise for the other surrounding properties. All adjoining properties will therefore maintain a minimum 3 hours of sunlight to living and principal private open space areas between 9am and 3pm at the mid-winter solstice.

Mitigation Measures

No additional mitigation measures are required.

7.8 Traffic & Parking

Surface car parking is provided for 3 vehicles, including one accessible space. Unrestricted street parking is available on Kelloway Avenue to accommodate any overflow parking demand generated by the proposed development, other than immediately fronting the majority of the site which is a no stopping zone during school drop offs and pickups.

Proposed on-site parking provision of 3 car parking spaces complies with the minimum require rates under the Housing SEPP.

The Traffic and Parking Impact Assessment (**Appendix S**) indicates that the development will have an acceptable impact with regards to traffic generation. The projected net change in traffic activity because of the development proposal is negligible and will not have any unacceptable implications in terms of road network capacity.

Mitigation Measures

No mitigation measures are required.

7.9 Flora and Fauna

An Arboricultural Assessment and Tree Protection Plan has been prepared for the site by Vertical Tree Management & Consultancy (**Appendix J**) and the report considers 19 trees.

The report recommends the removal of 10 existing trees within the site that are either located within the proposed development footprint or that would be impacted by an unavoidable major encroachment within their tree protection zones.

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

Retained trees are to be protected in accordance with the Tree Protection Plan contained within the Arboricultural Assessment (refer **Appendix J**).

7.10 Heritage (European / Indigenous)

No heritage items are identified in Camden 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 6 June 2023 (**Appendix I**) did not find any record of Aboriginal Sites or Places on the Site or in the surrounding locality and the site is considered to be disturbed land. Consideration of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*, determined that no additional investigation was warranted. Discovery of cultural material during development activities cannot be ruled out, however, an identified requirement has been applied should any Aboriginal relics be discovered on the Site during excavation/construction.

Other Cultural Heritage

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

Mitigation Measures

A standard Identified Requirement (No. 43) 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 Investigation (**Appendix P**) indicates that the sub-surface profile across the site is anticipated to comprise a sequence of topsoil/fill and natural soils to depths exceeding 1.5m from existing ground surface. The fill is likely to be well compacted and the presence of topsoil means that the fill is unlikely to be controlled fill. There is no evidence certifying that the fill is controlled; it has been recommended that the suitability of the existing fill as foundation material for the proposed development is confirmed by proof rolling and insitu density tests.

Mitigation Measures

No mitigation measures are required in response to the Geotechnical Site Investigation.

Contamination

The *draft Contaminated Land Planning Guidelines* (draft Guidelines) prepared by the Department of Planning and Environment and the Environment Protection Authority provides a checklist of matters to be considered in an initial evaluation of land in relation to potential for contamination. These matters are considered in **Table 10**, below and do not indicate that any additional investigation is necessary.

Table 10 checklist for guiding an initial evaluation of site

Previous evidence of contamination	Yes/ No	Response
a) Was the subject land at any time zoned for industrial, agricultural or defence purposes?	No	Historical aerial images identify that between 1970 to 2022 the 2 lots were used continuously for residential purposes. In July 2022, the 2 dwellings were demolished. Identified requirements attached to the Activity Determination include protocols to follow should unexpected contamination be found on site during the demolition and construction stages.
(b) Do existing records held by the planning authority show that a potentially contaminating activity listed in Table 1 in Appendix 1 has previously been approved or carried out on the subject land? (The use of records held by other authorities or libraries is not required for an initial evaluation.)	No	LAHC records indicate that the land has not been used for a potentially contaminating activity listed in Table 1, Appendix 1 of the draft Guidelines.
(c) Is the subject land currently used for a potentially contaminating activity listed in Table 1 in Appendix 1?	No	The 2 lots are vacant and not used for any potentially contaminating activities.
(d) Has the subject land ever been regulated through licensing or other mechanisms in relation to any potentially contaminating activity listed in Table 1 in Appendix 1?	No	LAHC records indicate that the land has not been regulated through licensing or other mechanisms.
(e) Are there any land use restrictions on the subject land relating to possible contamination, such as orders or notices issued under the CLM Act?	No	As noted in the section 10.7 certificates, there are no land use restrictions relating to contamination under the CLM Act.
(f) Has a site inspection indicated that the site may have been associated with any potentially contaminating activities listed in Table 1?	No	There is no indication that the site is or has been used by contaminating land activities. A standard Identified Requirement (No. 17) has been recommended to cover the possibility of discovering site contamination construction.
g) Are there any contamination impacts on immediately adjacent land which could affect the subject land?	No	Adjoining development is of a residential nature and no adjoining lots contain historical or current uses which are likely to contribute to contaminated lands.
(h) Are there any human or environmental receptors that could be affected by contamination?	No	A standard Identified Requirement (No. 17) has been recommended to cover the possibility of discovering site contamination during construction.
i) Is the site adjacent to a site on the EPA's list of notified sites under s60 of the CLM Act, or adjacent to a site regulated by the EPA under the CLM Act?	No	A review of the EPA's register of notified sites indicates that the land is not adjacent to a notified site under s60 of the CLM act or a site regulated by the EPA under the CLM Act.

Mitigation Measures

A standard Identified Requirement (No. 17) has been recommended to cover the possibility of discovering Site contamination during demolition / construction works.

Acid Sulfate Soils

According to Council's Section 10.7(2) & (5) Planning Certificates, the land is not identified as being on 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.

Mitigation Measures

No mitigation measures are required.

7.12 Drainage / Flood Prone Land / Hydrology/ Water Quality

Stormwater drainage for the proposed development has been designed in accordance with Council's requirements. Stormwater will be collected via a series of stormwater pits and gutters on the site connected to an underground detention tank draining to the proposed street drainage pit within Kelloway Avenue at the site frontage. During the assessment of this activity and with consideration of the Council submission matters, the stormwater pipe within the street verge has been increased in diameter to the satisfaction of Council.

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

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

Mitigation Measures

Identified Requirements (Nos. 6-9 & 14) 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 Camden Council (**Appendix F**) 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 Construction

During demolition/construction typical noise levels associated with demolition/ building works will be generated within the hours of 7am to 5pm Monday to Saturday, consistent with the requirements for complying development across NSW.

The Traffic Noise Impact Assessment (**Appendix T**) indicates that the development will experience minimal acoustic road impacts from the Old Hume Highway. Windows at the proposed boarding house can be left open and meet internal noise criteria. Following the recommendations made within **Appendix T** the boarding house can meet daytime and night-time internal noise criteria in all spaces.

Noise generated when the proposed development is completed and occupied will be in keeping with the residential surroundings. No major plant or equipment, which 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 and to achieve internal noise level design targets.

Mitigation Measures

The material recommendations contained within the Traffic Noise Impact Assessment (**Appendix T**) are to be implemented as part of the detailed design stages. An Identified Requirement (No. 61) has been applied.

7.15 Air Quality

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

Mitigation Measures

Appropriate standard Identified Requirements (No.52 and 53) 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 Construction

During the construction of the buildings, an area will be set aside on the site as a compound for the on-site storage of materials prior to their removal from the site. This compound will provide for:

- Material sorting;
- Segregation of materials that may be hazardous and which will be required to be disposed;
- Recovery equipment, such as concrete crushers, chippers, and skip bins;
- Material storage; and
- Access for transport equipment.

Construction materials waste must be removed from the site to an approved waste management facility or shall be recycled as follows:

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

During Occupation

General and non-recyclable waste will be disposed of in Council's standard waste storage bins located in the garbage storage enclosure 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

A standard Identified Requirement (No. 34) is recommended to require the preparation of a final waste management plan for the demolition, construction and occupation phases of the development.

7.17 Resource Use & Availability

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

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

The proposed development is for the replacement of existing housing, which has already been demolished, that had 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 Camden 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 Camden local government and surrounding areas through:

- more efficient use of land resources, existing infrastructure and existing services;

- local sourcing of construction materials, where possible;
- the local sourcing of tradesmen and other construction-related professionals, where possible;
- 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 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 and 171A 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, CLEP 2010, 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, will have a number of positive environmental effects in terms of the built environment and will deliver a range of social and economic benefits.

The proposed development will enable LAHC to meet the increasing demand for boarding house rooms 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 the **Activity Determination** accompanying this REF.

APPENDIX A – ARCHITECTURAL PLANS

APPENDIX B – LANDSCAPE PLANS

APPENDIX C – CIVIL PLANS

APPENDIX D – SURVEY PLAN

APPENDIX E – NOTIFICATION PLANS

APPENDIX F – SECTION 10.7 PLANNING CERTIFICATES

APPENDIX G – NOTIFICATION LETTERS

APPENDIX H – ACCESS REPORT

APPENDIX I – AHIMS

APPENDIX J – ARBORIST REPORT

APPENDIX K – BASIX CERTIFICATE

APPENDIX L –BCA REPORT

APPENDIX M – DESIGN COMPLIANCE CERTIFICATE

APPENDIX N –NATHERS CERTIFICATE

APPENDIX O – CHARACTER STATEMENT

APPENDIX P – GEOTECHNICAL INVESTIGATION

APPENDIX Q – TITLES & DEPOSITED PLANS

APPENDIX R – WASTE MANAGEMENT PLAN

APPENDIX S – TRAFFIC AND PARKING IMPACT ASSESSMENT REPORT

APPENDIX T – TRAFFIC NOISE IMPACT ASSESSMENT REPORT

APPENDIX U – SOIL CHARACTERISATION ASSESSMENT REPORT