

Our ref: SUB23/42940

65 Pegler Avenue
SOUTH GRANVILLE NSW 2142

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02 March 2023

Subject: 66-70 Pegler Avenue, South Granville

Dear ###

I am writing to you from the NSW Land and Housing Corporation (LAHC) to update you about our plans to redevelop the housing site at 66-70 Pegler Avenue, South Granville and seek your feedback on our detailed design.

What we are proposing

We are proposing to replace the existing aged properties with new two to three storey seniors' housing development that better suit the needs of residents. This will include:

- 24 homes in total – 13 x one-bedroom units and 11 x two-bedroom units
- 11 on-site car parking spaces
- landscaping and fencing across the site

What we have done so far

In October 2022 we invited the community to provide preliminary feedback about the proposal. The key themes raised in feedback received related to:

- anti-social behaviour and future tenant selection
- waste collection
- onsite parking, street parking and local traffic
- privacy

In response to this feedback, I can confirm:

- The majority of tenants are good neighbours and law-abiding people. Nevertheless, the Department of Communities and Justice (DCJ) has in place a policy for dealing with disruptive tenants. More information about the policy can be found at <https://www.facs.nsw.gov.au/housing/policies/antisocial-behaviour-management-policy>. In addition, DCJ has a dedicated 24 hour hotline, 1800 422 322, where local residents can report any tenancy related matters, or you can email the Parramatta DCJ Housing Team at T803@facs.nsw.gov.au with concerns about antisocial behaviour or property care issues.

- The proposed design will include two communal bin-waste areas to store the required number of bins within the property and the bins will be taken to the site street frontage for collection and returned to the bin-waste areas in compliance with Council requirements.
- As part of the planning process, LAHC has commissioned a traffic and parking report to assess the potential impacts of the proposed development. The traffic and parking report concludes that the additional traffic movements are not expected to have any negative impacts on the local street network.

In relation to car parking, the development provides 11 car parking spaces on the site, which is consistent with the amount of car parking required for a seniors housing development located in an accessible area under State Environmental Planning Policy (Housing) 2021.

- The proposed design maintains privacy for the neighbouring properties by minimising visual and acoustic impacts on neighbouring properties, through careful window placement, translucent glazing on the awning style windows and privacy screening to balconies where required. The screen planting along the side and rear boundaries will reach a mature height of 2 -5 metres and will be both aesthetically pleasing whilst also adding privacy.

What is happening now?

We have recently completed a detailed design process for 66-70 Pegler Avenue, South Granville and we invite your feedback. All submissions received will be considered by the project team before a decision is made on whether the project will proceed.

Please find enclosed:

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

How you can submit your feedback

After reading through the enclosed materials, we invite you to have your say by contacting the Community Engagement Team via email: CommunityEngagement@facs.nsw.gov.au or phone: 1800 738 718.

All feedback should be received **by 27 March 2023** to give us enough time to consider it and you will receive confirmation that your feedback has been received.

Department of Planning and Environment

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Lynne Welch".

Lynne Welch
Manager, Community Engagement
NSW Land and Housing Corporation

About the NSW Land and Housing Corporation

Delivering housing is much more than providing people with a roof over their head. Having access to safe housing assists people to pursue health, education and employment opportunities, allowing them to thrive and strengthen the communities where we all live.

At the NSW Land and Housing Corporation, our role is to actively grow and manage the supply of the right types of housing, at the right time, in the right areas, for people in need in our communities.

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



Department of Planning and Environment

Our ref: SUB23/42935

Peter J Fitzgerald
The General Manager

Cumberland City Council
PO Box 42
MERRYLANDS NSW 2160

02 March 2023

Subject: Notice of proposed seniors housing – Attention: Planning

Dear Peter J Fitzgerald

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

Property: 66-70 Pegler Avenue, South Granville
Lots 14-16 in DP 36280

Proposal: Construction of a seniors housing development containing twenty four (24) dwellings, comprising 13 x 1-bedroom and 11 x 2-bedroom units, parking for eleven (11) vehicles, associated site works and landscaping, and consolidation of three (3) lots into a single lot.

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

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

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

Please email Council's comments to Frances Beasley Planner, LAHC at **Frances.Beasley@facns.nsw.gov.au** by **27 March 2023**.

For general enquiries our Community Engagement team can be contacted on 1800 738 718 or by email at CommunityEngagement@facns.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Lynne Welch".

Lynne Welch

Manager, Community Engagement
NSW Land and Housing Corporation



CUMBERLAND
CITY COUNCIL

OA2023/0002

21 April 2023

Department Of Planning Industry & Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Sir/Madam,

Subject: Council commentary regarding notification of proposed residential development for the purposes of seniors housing.

Application No: OA2023/0002

Property: 66 - 70 Pegler Avenue, South Granville

Proposal: Construction of a seniors housing development containing twenty four (24) dwellings, comprising 13 x 1-bedroom and 11 x 2-bedroom units, parking for eleven (11) vehicles, associated site works and landscaping, and consolidation of three (3) lots into a single lot.

Reference is made to the Department of Planning, Industry and Environment referral received on 4 April 2023 inviting Council's comments for the proposed development.

Council has reviewed the submitted information and the following response is provided.

A. Planning Comments

State Environmental Planning Policy (Housing) 2021

The proposal is considered 'development without consent' pursuant to State Environmental Planning Policy (Housing) 2021. In this regard, Chapter 3 - Diverse Housing, Part 5 (Housing for Senior and people with a disability), Division 8 - Seniors Housing -Aboriginal Housing Office and Land and Housing Corporation applies for the subject development. The following comments are provided regarding the State Policy:

Clause 108B(1)(b)

Clause 108B(1b)(i) and (ii) state that the development will not result in a building with a height of more than 9.5m or if the roof of the building contains servicing equipment resulting in the building having a height of more than 9.5m and the servicing equipment complies with section 84(3)—11.5m.

It is noted that the proposal provides a building height of 9.5m excluding the lift overrun (to be maintained under 11.5m) on the roof of the building, which is considered satisfactory.

16 Memorial Avenue, PO Box 42, Merrylands NSW 2160
T 02 8757 9000 E council@cumberland.nsw.gov.au W cumberland.nsw.gov.au
ABN 22 798 563 329

Welcome *Belong* Succeed

Clause 108B(1)(c)

Clause 108B(1)(c) states that the senior housing will not contain more than 40 dwellings on the site.

The proposal provides 24 dwellings and therefore complies with this clause.

Clause 108C (1)(d)

Clause 108C (1)(d) states that the relevant authority must take into account the relevant provisions of the *Seniors Living Policy: Urban Design Guidelines for Infill Development*, published by the Department in March 2004.

Clause 108C (1)(e) and (f)

Clause 108C (1)(e) state that 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) the *NSW Land and Housing Corporation Design Requirements*, published by the Land and Housing Corporation in February 2023, and
- (f) consider the design principles set out in Division 6.

In relation to the above, Council notes that a completed assessment of the proposed development against the Seniors Living Policy: Urban Design Guideline for Infill Development, March 2004, Design Requirements and the Design Principles has been considered and is provided with the proposal.

Apartment Design Guide

For the proportion of the Development which is three storeys or greater, Part 3 (Sitting the development) and Part 4 (Designing the building) of the Apartment Design Guide is applicable.

Building Separation

Bedroom 1 of Ground floor Unit 10 shall be provided with a compliant building separation of 6m along the northern boundary to ensure amenity of the adjoining neighbours is reasonably maintained.

Communal Open Space

Communal Open Space shall be consolidated into a well designed and usable area with a minimum dimension of 3m. In this regard, location of COS within the front setback in close proximity to the garbage bins shall be reconsidered.

The development is generally considered appropriate in terms of appearance and consistent with the surrounding developments. The bulk and scale of the development is considered acceptable for the proposed use and compatible with the streetscape and desired future character of the locality.

B. Environmental Health Unit (EHU)

It is recommended that the following documents be submitted for review to ensure that the site would be suitable for the development and to ensure that there won't be ongoing issues for the surrounding area and sensitive receivers once the development is complete.

1. An acoustic assessment should be carried out from a suitably qualified acoustic consultant with the proposal. The acoustic assessment must demonstrate that the development will comply with the NSW EPA's Noise Policy for Industry (NPfI) and any relevant noise requirements of Council's DCP. The report should consider the noise impacts on any sensitive receivers in the vicinity of the proposed development that may be caused by the development

including, but not limited to, mechanical plant, traffic noise, communal areas, operational noise from the site. The report must also give recommendations where noise attenuation measures are required.

2. A Preliminary Site Investigation (Stage 1) report should be prepared to accompany the development application with respect of the suitability of the site for the proposed site. The report shall be prepared by a suitably qualified consultant in accordance with relevant EPA guidelines. Please be advised that depending on the findings of the Preliminary Site Investigation (Stage 1) report, it may be necessary to conduct further contamination investigations and furnish Council with more reports namely a Detailed Site Contamination Investigation (Stage 2) Report and/or Remediation Action Plan and/or Site Audit Statement. If this is required, it is recommended to submit all reports with the application, so the assessment of the DA is not delayed.
3. A Hazardous Materials Survey Report should be prepared by a suitably qualified person (such as a certified Occupational Hygienist) The report must identify and record the type, location and extent of any hazardous materials on the site and make recommendations as to the safe management and/or removal to ensure the site is safe for demolition, construction and future use/occupation.
4. Indicate if there will be warm water systems and/or cooling water systems installed at the development.

C. Tree Management Section

Tree protection plan for site

As per the recommendations of the Arboricultural Impact Assessment, all trees within the site and within adjoining properties are to be protected as per AS490 - 2009 'Protection of Trees on Development' except where otherwise stated.

Landscape works

All soft and hard landscaping works to be undertaken on the site should be carried out by a minimum AQF3 landscaper. The final inspection of works should be signed off by an individual other than the person carrying out the works.

D. Development Engineering Section

Stormwater

1. The proposed driveway is likely to impact on the existing RHS outlet pipe from the neighbouring property (335 Blaxcell Road). The exact location and levels (invert level, obvert level, and the Finished surface level) should be investigated and shown on the amended stormwater plan for clarity. The conflict must be resolved with appropriate remedial measures which must be clearly outlined.
2. The OSD Cross-sectional drawing lacks detail information. The various levels (surface level invert levels), dimensions etc are missing.
3. The layout plan of the OSD tank with the chamber and pipe line layouts, connection are to be provided.

4. The detail of the pipeline (long-section profile details, and any service crossing details such as invert and over levels in mAHD, sizes/offsets, type of crossings, etc. that may conflict with the proposed pipe line) along the kerb & gutter (within the public domain) up to the connection point with council's kerb inlet pit has not been provided. The pipe size within the public domain must not be less than 375mm RCC class IV pipe. Further, the detail of the proposed new kerb inlet pit in front of the subject site and the connection detail into the downstream existing kerb inlet pit must also be provided for clarity.
5. The arrangement of the OSD tank incorporating the filtration system does not appear to function as intended and the pollutants are likely to escape the treatment system. (for clarification and detail the comments outlined below in "Water Sensitive Urban Design (WSUD)" Section should be referred).
6. The on-site detention (OSD) system does not appear to be designed in accordance with the upper parramatta river catchment trust's (UPRCT) design guideline.

The design must take account for the following:

- a. The stormwater system must be designed in accordance with the council's stormwater policy, guidelines etc.
- b. The stormwater runoff from the site must be managed by provision of the On-site detention (OSD) system. The on-site detention system must be designed using the OSD calculation summary sheet with the site storage requirement (SSR) of $470\text{m}^3/\text{ha}$ and the Permissible site discharge (PSD) of 80 l/s/ha as the OSD parameters. The OSD storage volume provided must be sufficient to surpass the peak storm event.
- c. Unless the runoff is directed into the rainwater tank or the water quality treatment system, all the runoff from the site must be directed to the High Early Discharge (HED) control pit of the OSD system and the outflow from the OSD system must be disposed by gravity onto the appropriate council's stormwater system.
- d. All the runoff from the site is to be directed into the OSD system. In some very exceptional circumstances where the surface runoff may not be directed into the OSD system, up to 15% of site area is allowed to bypass the OSD system. However, the runoff from the bypassed area is still required to be managed appropriately and cannot be left to run on its own.
- e. The OSD underground tank must incorporate a HED chamber and an overflow chamber to control and maintain the top water level (TWL) within the underground OSD tank.
- f. The OSD system must be designed based on the Tail-water level at the point of discharge and the OSD storage adjusted accordingly. The tailwater level to be considered will be the 1%AEP flood level, if the location is being affected by flood, or the grate level of the pit if proposed to be connected into the pit.
- g. The total runoff exceeding 30 l/s from the site must be discharged into the nearby stormwater pipe system. Discharging of flow exceeding 30 l/s onto kerb & gutter is not permitted.

- h. Information on the point of disposal such as the council's stormwater system (Pipe /pit, etc.) on to which the site stormwater is intended to be discharged must be obtained from the relevant authority (Council, Sydney water, or RMS whichever is applicable) or if the information is not available then appropriate survey investigation must be carried out and the details clearly shown on the survey investigation plan. The survey investigation plan should be prepared by the surveyor and relevant supporting information must include with the plan.
 - i. A full set of stormwater plan incorporating the requirements must be submitted with the development proposal application.
- 7. Runoff from the site shall be routed through a sediment trap pit before it is discharged into Council's drainage system. Such sediment trap pits shall have a 200 mm sump below the invert level of the outlet pipe.

Water Sensitive Urban Design (WSUD) measures

- 8. The submitted documents lack sufficient information to determine the appropriateness of the water quality treatment chain/ arrangement. Nevertheless, as outlined above the water quality treatment system does not appear to function as intended. In this respect, the following should be complied with:
 - a. The Water Sensitive Urban Design (WSUD) measures must be designed in accordance with the Section 2.5 & 2.7 of Cumberland DCP2021 part G4. The development must incorporate the appropriate WSUD measures to comply with the controls outlined therein and achieve the pollutant removal targets as specified in the Table 5. The WSUD measure must accompany a MUSIC model.
 - b. The surface runoff from the impervious area such as the roof, car parking area, driveway and roads must be directed to the water quality treatment systems. In this regard:
 - i. Arrangement must be made to collect and separate the first flush, i.e., the initial flow equivalent to 1 in 3 month's flows from each catchment that contains high concentration of pollutants, to be collected and treated fully without being escaped untreated. In this regard, a device known as a high-flow bypass chamber shall be employed to separate the initial flow, i.e., 1 in 3 month's equivalent flow, to be separated through a low-level flow outlet into the water quality treatment / filtration system, and the flow exceeding the rate to be discharged through the high-level overflow or outlet pipe into the OSD system.
 - ii. The flow must be controlled by appropriate mechanism such as orifice (the flow exceeding 1 in 3 months equivalent flow must be directed into to the OSD system).
 - iii. Appropriate number of devices must be provided sufficient treatment rate equivalent to the flow rate of the separated flow containing concentrated pollutants and ensure that no flow escapes or overflows bypassing the treatment system.

- iv. The required provision must be shown on the drawing. In this regard, cross-sectional details of the treatment system with the respective levels, must be prepared to ensure that the HGL from the treatment system is consistent and at a higher level and that there is no backflow into the treatment system.
- v. If the outflow from the treatment system, is not connected back into the OSD system then, the site permissible discharge rate must be reduced by the flow equivalent to the outflow from the treatment system, and the orifice size be adjusted accordingly.
- c. The pollution removal targets must be demonstrated with the supporting documents including the MUSIC model with the input parameters and output results. Further, the removal efficiency parameters input in the model must be consistent with the manufacturer's pollutant removal efficiency.
- d. Electronic copy of the MUSIC models must be submitted accompanying the input and output parameters/ results.
- e. The MUSIC model components and the layout train must be consistent with that shown on the stormwater drawing. A plot of the MUSIC model with the type of sources and their respective catchment area (pervious, impervious) must be shown on the model plot. Additional plot of the model result should also be prepared.
- f. A regular minor and major maintenance schedule must be implemented.

Traffic and the vehicular Access to the site

- 9. Provision must be made for access and parking space for the emergency vehicle (ambulance). The turning /manoeuvring of such vehicle must be demonstrated by swept path clearance diagrams i) at the entry to and from the street, ii) manoeuvring in and out of parking space and iii) turning back to exit to street.
- 10. The pedestrian access (walkway) to and from the car parking spaces to the building must be safe with zero or minimal chances of being in collision with oncoming traffic. They must be marked to guide pedestrian safely to the car spaces.

Should you have any further enquiries please do not hesitate to contact Nighat Aamir on 8757 9972 in relation to this matter.

Yours faithfully,



Harley Pearman
Acting Coordinator Major Development Assessment