

Department of Planning and Environment

Our ref: SUB23/41104

Gail Connolly

Chief Executive Officer

City of Parramatta

PO Box 32

PARRAMATTA NSW 2124

03 October 2023

Subject: Notice of proposed residential housing – Attention: Planning

Dear Gail Connolly

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

Property: 18-28 Simpson Street, Dundas Valley

Lots 1707 - 1712 in DP 31846

Proposal: Demolition of three (3) existing manor homes. Consolidation of the existing 6 lots into 1 lot; subdivision of 1 lot into 4 new allotments. A total of 4 manor homes are proposed, with 1 manor home on each newly created lot. Each manor home will contain 4 units (2 x 2 bedroom units and 2 x 1 bedroom units). Therefore, a total of 16 dwellings are proposed. 2 new driveway crossings are proposed with 1 driveway shared via a right of carriageway between 2 allotments. A total of 8 car parking spaces are proposed across the 4 proposed lots. Each newly created lot will have 2 on-site car parking spaces.

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 available via this [Dropbox link](#) for Council's review and comments:

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

Department of Planning and Environment

Please email Council's comments to Gavin Ho, Planner, LAHC at Gavin.Ho@facsnsw.gov.au by **27 October 2023**.

For general enquiries, please contact our Community Engagement team on 1800 738 718 or by email at CommunityEngagement@facsnsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Lorna O'Shane".

Lorna O'Shane

Manager, Community Engagement
NSW Land and Housing Corporation

Our ref: SUB23/41059

DUNDAS VALLEY NSW 2117

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



03 October 2023

Subject: 18-28 Simpson Street, Dundas Valley

Dear The Resident(s)

I am writing to you from the NSW Land and Housing Corporation to update you about our plans to redevelop the site at 18-28 Simpson Street, Dundas Valley. We seek your feedback on our detailed design.

What we are proposing

We're proposing to replace the existing aged properties with four manor homes to better suit the needs of residents. The proposal includes

- The consolidation of the existing 6 lots into 1 lot, and the subdivision of 1 lot into 4 new allotments.
- A total of 4 manor homes are proposed, 1 on each new lot. Each manor home will comprise 4 units (2 x 2-bedroom units and 2 x 1-bedroom units) and 2 car parking spaces. A total of 16 units and 8 car parking spaces will be provided across the entire development site.
- Landscaping, fencing and associated works.

What is happening now?

We have recently completed a detailed design process for 18-28 Simpson Street. We invite your feedback, which our design and planning team will consider when they assess this project. Where possible, we will incorporate your feedback in the designs.

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, you can 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 October 2023** to give us enough time to consider it. You will receive confirmation that we have your feedback.

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink that reads "Lorna O'Shane".

Lorna O'Shane
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>





Your Reference: SUB23/41104
Our Reference: NCA/18/2023
Contact: Maya Sarwary
Telephone: 9806 5578

2 November 2023

Dear Gavin

SUB23/41104– Manor House Development – 18-28 Simpson Street Dundas Valley

City of Parramatta Submission

I refer to the proposal for demolition of three (3) existing manor homes, consolidation of the existing 6 lots into 1 lot; subdivision of 1 lot into 4 new allotments and construction of 4 manor homes with 1 manor home on each newly created lot at 18-28 Simpson Street Dundas Valley.

Council officers have reviewed the documentation as submitted by the Department of Planning and Environment with respect to this application and wish to make the following comments.

TELOPEA PRECINCT

The subject site is located in the Telopea Precinct under the provisions of the Parramatta DCP 2023.

The development should comply with the building envelope controls of this precinct where applicable. In this regard the development does not comply with the following envelope controls stipulated for development within the Telopea precinct:-

- Rear Setback
- Separation Distances
- Deep Soil, Area Landscaped Area and Communal Open Space

The development is also to comply with the Sustainability Clause (Clause 8.2.7.5) of the Telopea Precinct in relation to dual water systems, Urban Heat, Roof Surfaces, Vertical Facades, Heating and Cooling Systems, Green Roofs or Walls, Solar Light Reflectivity and Water Sensitive Urban Design.

VISUAL AND ACOUSTIC PRIVACY

Concern is raised that the upper floor rear private open space areas (balconies) and living/dining area windows on the side and rear elevations of the development will result in unacceptable visual and acoustic privacy impacts to adjoining residential properties.

URBAN DESIGN COMMENTS

- Although permitted, it is questioned whether the manor house typology is appropriate for seniors housing. 12 out of 16 of the proposed units are accessible via stairs (including all 1 bedroom units) and first floor units have no lift access, which may result in accessibility issues for residents. The location of parking spaces away from dwelling entries could also impact amenity for seniors.
- It is recommended that the ground and first floor levels for each manor house be at the same finished floor level and not be stepped. This will limit the overall number of stairs to the first floor and provide uniform window and sill heights.
- The proposed streetscape design is supported, with each manor house appearing as a residential dwelling from Simpson Street. City Design recommend the following to further improve this design:
 - o The ground floor setback should be increased from 5.5m to a minimum 7m to better align with the existing context of the street,
 - o Finished floor level should align with ground level of street. Where the topography does not allow this, private open space at levels below that of the street should have an increased minimum depth to improve amenity.
 - o Ground floor apartments facing Simpson Street should have individual entries and private gardens off Simpson Street to improve activation,
 - o Driveway widths should be minimised, especially at the kerb crossing to mitigate their impact on the streetscape.
- It is recommended that unrelieved walls along the driveways and side setbacks should be broken down with breaks and articulation after 10m wall lengths to reduce their impact.
- The 'gun barrel' driveways are not supported as they visually dominate the site. Alternative designs should be considered that avoid the driveways running the length of the site and dominating the landscape.
- It is unclear whether areas of landscaping between manor houses and along the side setbacks are provided as private open space or communal open space (it appears that there is no communal space proposed on the site). It is recommended these areas be utilised as usable space. It is also recommended that the proposal include some area of communal open space (possibly at the rear of the property) designed with appropriate furniture, amenities and shade.

- Visitor parking spaces should be considered.

ENGINEERING COMMENTS

Retaining Walls

The fill in the Eastern corner is excessive and should not increase from the existing fill condition on the site. In this regard, the filled area shall be reduced to appropriately respond to the topography of the site and surrounds. If the maximum OSD bypass could not be achieved, Council would support the development if the combined OSD bypass was less than 15%, while minimising bypass where possible.

UNIVERSAL ACCESS COMMENTS

1. A comprehensive Access Report by Loka Consulting Engineers Pty Ltd has been provided identifying several issues that will be required to be addressed at the construction certificate (CC) stage of the project. These additional comments are not limited to or replace those mentioned within the access report and does not relinquish the applicant from its obligation to provide a fully compliant detailed universally accessible design.
2. No accessible access through the front door/door/principal entrance of the 02 units and upper levels within the four manor houses, therefore only 4 of the 16 units have compliant access. The lack of access promotes social isolation for those who can't manage stairs.
3. There is a difference of 680mm between the floor levels on the ground and first floor levels addressed by stairs denying access throughout the site.
4. Ensure all handrails to stairs and ramps within the common areas follow AS1428.1.
5. Ensure low level thresholds are provided at the doors providing access to the outdoor areas.
6. The abutments of varying surfaces are to provide level transitions.
Design transition shall be 0 mm. Construction tolerances shall be as follows:
 - (a) 0 ±3 mm vertical.
 - (b) 0 ±5 mm, provided the edges have a bevelled or rounded edge to reduce the likelihood of tripping. **AS1428.1.7.2.**

Summary

- Ensure compliance with the Loka Consulting Engineers Pty Ltd Access Report.
- Address the lack of access through the entry doors of the units.
- Address the 680mm difference in the ground floor levels.
- Ensure the stairs and handrails comply with AS1428.1.

- Ensure low level thresholds are provided at the doors accessing the outdoor areas.
- The abutments of varying surfaces are to provide level transitions.

TRAFFIC COMMENTS

Description/Development Control/Design Requirements	Proposal	Comments	Compliance
<p>Parking Requirements - The housing SEPP 2021 "State Environmental Planning Policy".</p> <p><i>Section 42 "Development may be carried out without consent:</i></p> <p><i>(i) for each dwelling containing 1 bedroom—0.4 parking spaces,</i></p> <p><i>(ii) for each dwelling containing 2 bedrooms—0.5 parking spaces,</i></p> <p>Manor houses</p> <ul style="list-style-type: none"> • 8 x 2-Bedrooms $0.5 \times 8 = 4$ • 8 x 1 Bedroom $0.4 \times 8 = 3.2$ <p>Total 7 spaces</p>	<p>8 uncovered parking spaces (2.4m X 5.45m) are provided, as shown on Site Plan.</p>	<p>8 uncovered parking spaces are provided.</p>	Yes
<p>Turning Bay requirements</p> <p>Figure 2.10 and Section 2.5.3 of AS 2890.1</p>	<p>Turning bay is provided for manoeuvring vehicles enter and exit from the driveway in forward direction. The turning bay has a steep cross-fall of 1 in 16 (6.25%) max.</p> <p>The remap has a max Longitudinal grade of 1:20 (5%)</p>	<p>The proposed driveway is 3m wide which is widened at the parking bays (Aisle width of 8m) and has a cross-fall of 1 in 16 (6.25%) max, which complies with AS 2890.1:2004 (figure 2.10).</p>	Yes
<p>Parking Spaces – Layout and dimensions (Figures 2.2 of AS 2890.1-2004)</p>	<p>The dimensions of the uncovered parking space are 5.45m x 2.4m as shown on the Site plan. Additional clearance is provided from high</p>	<p>The proposal meets the requirements of AS2890.1.</p>	Yes

	vertical obstructions in accordance with the Australian Standards.		
On-site manoeuvring (AS 2890.1-2004 Appendix B; Figures B5 and B6)	Swept path plans have been provided with the submitted Traffic management Report	The on-site manoeuvring appears satisfactory.	Yes
Vehicular Access Driveway entry and exit - Clause 3.2; Tables 1.1, 3.1 and 3.2 of AS 2890.1-2004	Both driveways are 5.5m wide driveway near the property boundary from Simpson Street.		Yes
Driveway gradients - Clause 2.5 and Clause 2.6 of AS 2890.1-2004	Driveway gradients are not shown on the submitted. It appears that the existing levels at the layback and boundary are to be retained which is approx. 7.5% (340mm raise over 4.6m long driveway) which is slightly greater than the max 5% gradient as specified in AS 2890.1 and as per Council Requirements. Changing the grades may mean that internal levels of the driveway need to be adjusted.	Driveway long section plans are to be provided on plans submitted with a construction certificate to ensure the levels comply with the requirements of AS 2890.1:2004.	No Can be conditioned
Sight lines	2m x 2.5 sight triangle splay have		Yes

	been shown on plans for both driveways		
<p>Traffic Generation - <i>RMS Guide to Traffic Generating Developments</i></p> <p>Dwelling houses</p> <ul style="list-style-type: none"> • 0.5 vehicle trips per dwelling peak hour = 0.5×16 dwelling = 8 • Less existing traffic: 0.85 vehicle trips per dwelling per peak hour = 0.85×6 dwelling = -5.1(-5) <p>Total additional trips = 3 vehicle trips per peak hour</p>	<p>According to Traffic Generation-RMS Guide to Traffic Generating Developments additional 3 vehicle trip during peak hour by the proposed development which will not have any impact on the existing road network</p>		Noted

Based on the analysis and information submitted by the applicant, the proposed development is not expected to have a significant traffic impact on the surrounding road network. The proposal can be supported on traffic and parking grounds subject to the following traffic related conditions.

- Driveway long section plans are to be submitted showing the RLs and driveway gradients along both edges of both driveways from the kerb line to the car parking area. The grades within the long-section must be compliant with the requirements of AS 2890.1:2004.

Reason: To comply with Council's requirements and Australian Standards

- The PCA shall ascertain that any new element in the at-grade carpark not illustrated on the approved plans such as columns, garage doors, fire safety measures and the like do not compromise appropriate manoeuvring and that compliance is maintained with AS 2890.1, AS2890.2 and AS 2890.6.

Reason: To ensure appropriate vehicular manoeuvring is provided

- Parking spaces are to be provided in accordance with the approved plans and with AS 2890.1, AS2890.2 and AS 2890.6.

Reason: To comply with Council's parking requirements and Australian Standards.

- Sight lines at the property line are to be provided in accordance with the minimum requirements specified in Figure 3.3 of AS 2890.1-2004 (a splay extending 2m from the driveway edge along the front boundary and 2.5m from the boundary along the driveway) on both sides of the access driveway. This splay shall not to be compromised by obstructions greater than 900mm in height such as landscaping, signage fences, walls or any display materials off Morton Street.

Reason: To ensure pedestrians safety

- Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

Reason: To ensure proper management of Council assets.

- Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal), prior to driving oversize vehicles through local roads within the City of Parramatta LGA.

Reason: To ensure maintenance of Council's assets.

TREE AND LANDSCAPING COMMENTS

1. The landscape m2 is inadequate across manor home 2, 3 & 4. It does not meet the minimum DCP landscape requirements as noted in the plans and Design verification Statement.
2. The landscape plans do not show any usable communal open space and are shown instead to be fully planted with shrubs and groundcovers. As per DCP 2023 Part 3.4.3.5 the design must *"provide low maintenance communal open space areas for residents that facilitate opportunities for recreational and social activities, passive amenity, landscaping, and deep soil planting."*
1. The private open spaces (POS) are inadequate within the front units:
 - Manor Home 2, 3, 4 - Unit 1 (2 bed ground level) should be 15sqm but only 12.8 sqm proposed. (12.6sqm for manor home 1)
 - Manor Home 1, 2, 3, 4 - Unit 3 (2 bed first floor) should be 12sqm but only 10.2 sqm proposed.
2. Landscape plans have not been provided for the first floor levels showing the POS.
3. The deep soil zone is inadequate across the site due predominantly to the parking areas and associated long driveway hard standing areas.
4. The parking areas are shown within the rear setback which is not supported.
5. The rear setback areas are for the landscape and deep soil zone only (not parking). It is to be redesigned as a quality, usable and functional landscape private and/or communal open spaces and not for the vehicular parking (refer to the objectives listed in part 3.4.3.5 DCP 2023).
6. Parking should be centralised as per the DCP 2023 requirements (refer part 3 Fig 3.4.3.2.1 page 49 and Fig 3.4.3.7.1 page 54)
7. It is recommended the bin storage areas are relocated to the side setbacks to increase the rear landscape communal and private open spaces.
8. The vehicular crossover is too excessive (shown 5.5m wide) and should only be 3.5m wide at the kerb as per DCP 2023 Part 3.4.3.6 C.07

Trees

- a) All of the 11 x trees on the site are shown to be removed plus 2 x street trees. This includes the proposed removal of a large 19m high mature *Cinnamomum camphora* (Camphor Laurel) T14 located in the rear setback close to the boundary. This tree was recorded to be in good condition with no defects.
- b) The development has shown no consideration to retain and protect any of the existing trees on the site, in particular tree 14 as per the Part 5.3.4 objectives.
- c) It is recommended the design is modified and the buildings adjusted to accommodate this mature tree T14 as part of the development and it is recommended to be incorporated in to the landscape communal open space as a mature living asset.
- d) 2 x replacement street trees are to be shown within the Simpson St road reserve, at a minimum 3m setback from the driveway entrances.

Council thanks you for the opportunity to provide comment on this application and would also welcome the opportunity to comment on further stages associated with the detailed design development of the site.

If you require any further information regarding this matter, please do not hesitate to contact me.

Kind Regards

Maya Sarwary

Senior Development Assessment Officer
Development and Traffic Services

(02) 9806 5578

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