

REVIEW OF ENVIRONMENTAL FACTORS

Proposed Seniors Housing Development

at

20-22 Raymond Street, Eastwood NSW 2122

March 2024





Acknowledgement of Country

Homes NSW 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.

Published by Homes NSW

REVIEW OF ENVIRONMENTAL FACTORS

First published: March 2024

Department reference number: D24/580126

On February 1 2024, Homes NSW, a division of the Department of Communities and Justice (DCJ) was formed. It has brought together the housing and homelessness services of DCJ with the NSW Land and Housing Corporation (LAHC), Aboriginal Housing Office (AHO) and key worker functions from across government under one roof.

Homes NSW Postal address: Locked Bag 5022, Parramatta NSW 2124

nsw.gov.au/homes-nsw

ABN 24 960 729 253

This document may only be used for the purposes associated with the subject activity to which this Part 5 Review of Environmental Factors relates and to the extent authorised under the provisions of the Environmental Planning and Assessment Act 1979 and Environmental Planning and Assessment Regulation 2021, for the express purposes set out under that legislation, and may not otherwise be copied, reproduced, distributed or used without the written permission of the authors.

DOCUMENT CONTROL REGISTER

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

No	Date	Version	Change since last version	Pages
1	21.11.2023	v1	Not applicable – initial version	
2	21.03.2024	v2	LAHC Final edits	Various

DOCUMENT SIGN-OFF

REF prepared and peer reviewed by:

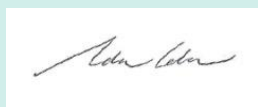
Having prepared the Review of Environmental Factors:

- I have declared any possible conflict of interests (real, potential or perceived) to the A/Executive Director of Portfolio Strategy and Origination, Housing Portfolio, Homes NSW.
- I do not consider I have any personal interests that would affect my professional judgement.
- I will inform the A/Executive Director of Portfolio Strategy and Origination, Housing Portfolio, Homes NSW as soon as I become aware of a possible conflict of interest.

Name: Adam Coburn

Designation: Managing Director NSW Meccone Group Pty Ltd

Signature:



Date: 18 March 2024

REF peer reviewed by:

Name: Rithy Ang

Designation: Planner, Homes NSW

Signature:



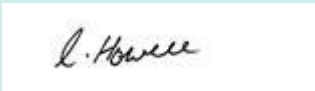
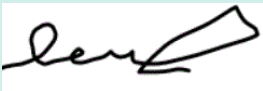
Date: 20 March 2024

REF reviewed and endorsed by:

I certify that I have reviewed and endorsed the contents of this REF document and, to the best of my knowledge, it is in accordance with the EP&A Act, the EP&A Regulation and the Guidelines approved under clause 170 of the EP&A Regulation, and the information it contains is neither false nor misleading.

Name: Carolyn Howell

Designation: Manager, Planning & Assessment, Homes NSW

Signature: 	Date: 21 March 2024
REF authorised for issue by:	
<p>Having authorised the issuing of this Review of Environmental Factors:</p> <ul style="list-style-type: none"> • I have declared any possible conflict of interest (real, potential or perceived) to the A/Executive Director of Portfolio Strategy and Origination, Housing Portfolio, Homes NSW. • I do not consider I have any personal interests that would affect my professional judgement. • I will inform the A/Executive Director of Portfolio Strategy and Origination, Housing Portfolio, Homes NSW as soon as I become aware of a possible conflict of interest. <p>Name: Ambrose Marquart</p> <p>Designation: Acting Director, Portfolio Services, Homes NSW</p> <p>Signature:  Date: 27.03.2024</p>	

Contents

1	Executive Summary	9
2	Introduction.....	11
2.1	Purpose of this Review of Environmental Factors (REF)	11
2.2	Assessment Methodology	11
3	Existing Site & Locality.....	13
3.1	Existing Site and Immediately Adjoining Development	13
3.2	Site Description	16
3.3	Neighbouring Development and Locality.....	17
4	Project Description	20
4.1	Demolition.....	20
4.2	Removal of Trees	20
4.3	Proposed Dwellings.....	20
4.4	Supporting information.....	24
5	Zoning and Permissibility	27
6	Planning and Design Framework.....	29
6.1	Environmental Planning and Assessment Act 1979	29
6.2	Biodiversity Conservation Act 2016 (BC Act)	29
6.3	Other Acts	29
6.4	Environmental Planning and Assessment Regulation 2021.....	30
6.5	State Environmental Planning Policy (Housing) 2021.....	32
6.6	Other State Environmental Planning Policies.....	50
6.7	Ryde Local Environmental Plan 2014 (RLEP 2014).....	54
6.8	Ryde Development Control Plan 2014.....	54
7	Notification, Consultation and Consideration of Responses	57
7.1	Council Notification	57
7.2	Notification of Occupiers of Adjoining Land and Other Persons.....	61
7.3	Notification of Specified Public Authorities	62
8	Review of Environmental Factors	63
8.1	Neighbourhood Character	63
8.2	Bulk and Density.....	63
8.3	Streetscape	64
8.4	Visual Impact	64
8.5	Privacy	65
8.6	Solar Access	65
8.7	Overshadowing	65
8.8	Traffic & Parking	66
8.9	Flora and Fauna	66
8.10	Heritage (European / Indigenous).....	67
8.11	Soils / Contamination / Acid Sulfate Soils / Salinity	67
8.12	Drainage / Flood Prone Land / Hydrology/ Water Quality	68
8.13	Bushfire Prone Land.....	69
8.14	Noise and Vibration.....	69
8.15	Air Quality.....	69

8.16	Waste Minimisation.....	69
8.17	Resource Use & Availability	71
8.18	Community / Social Effects	71
8.19	Economic Impact.....	71
8.20	Cumulative Impact Assessment	72
9	Conclusion.....	73
9.1	Summary of Key Issues Raised in Assessment.....	73
9.2	Recommendation	73
10	Appendices.....	74

List of Figures

Figure 1 Location Plan (Source: SIX Maps)	13
Figure 2 - Aerial Mapping of subject site outlined in red (Source: Nearmap)	14
Figure 3 Development site – 20 Raymond Street (Source: Nearmap, Streetview, December 2023)	14
Figure 4 Development site – 22 Raymond Street (Source: Nearmap, Streetview, December 2023)	15
Figure 5 Adjoining development – 18 Raymond Street (Source – Nearmap)	15
Figure 6 Adjoining development – 24/24A Raymond Street (Source – Nearmap)	16
Figure 7 More recent dual occupancy development at 7 & 9A Raymond Street (northeast of the site) (Source – Nearmaps)	17
Figure 8 More recent development at 3-5 Desmond Ave (northeast of the site) (Source – Google Maps)	17
Figure 9 - Multi-dwelling housing development at 4-6 Lincoln Street (southwest of the site) (Source - Google Maps)	18
Figure 10 - Recently completed LAHC owned seniors housing development at 8-10 Raymond Street (east of the site) (Source – LAHC records)	18
Figure 11 Extract from Architectural Plans – Site Plan (Source: Architectural Plans, DTA Architects, dated 09/10/2023)	21
Figure 12 Extract from Architectural Plans – Ground Floor Plan (Source: Architectural Plans, DTA Architects, dated 09/10/2023)	22
Figure 13 Extract from Architectural Plans – First Floor Plan (Source: Architectural Plans, DTA Architects, dated 09/10/2023)	23
Figure 14 Extract from Architectural Plans – Raymond Street Elevation (Source: Architectural Plans, DTA Architects, dated 09/10/2023)	24
Figure 15 Extract from Architectural Plans – Raymond Street Perspective (Source: Architectural Plans, DTA Architects, dated 09/10/2023)	24
Figure 16 Land zoning map (Source: Ryde LEP Land Zoning Mapping)	27
Figure 17 Map of Properties Notified of the Proposed Development (Source: LAHC)	61

List of Tables

Table 1 Supporting information	24
Table 2 Compliance with subsection 3 of Section 5.5 of the EPA&Act 1979	29
Table 3 Environmental Planning and Assessment Regulation 2021 [Section 171]	30
Table 4 Factors to be taken into account concerning the impact of an activity on the environment	30
Table 5 Compliance with relevant provisions under Chapter 3, Part 5, Division 8 of the SEPP for ‘seniors housing development without consent’ carried out by LAHC	33
Table 6 Compliance with section 84(2) (c) (iii), 85, 88, 89 of the Housing SEPP 2021	35
Table 7 Non-Discretionary standards for Independent Living units (Section 108)	36
Table 8 Accessibility and useability standards [Schedule 4]	38
Table 9 Seniors Living Urban Design Guidelines departures	44

Table 10 Response to Design Principles (Part 5, Division 8)	47
Table 11 Compliance with other applicable State Environmental Planning Policies.....	50
Table 12 Ryde Local Environmental Plan 2014	54
Table 13 Ryde Development Control Plan 2014	54
Table 14 Issues raised in Council submission	57
Table 15 Issues raised by adjoining owners / neighbours	62

1 Executive Summary

The subject site is located at 20-22 Raymond Street, Eastwood, and is legally described as Lots 34 & 35 in Deposited Plan 35375. The proposed seniors housing development is described as follows:

Demolition of existing dwellings and structures, tree removal, and the construction of a 10 dwelling senior housing development containing 5 x 1 bedroom and 5 x 2 bedroom independent living units, with associated landscaping and fencing, surface parking for 5 cars, and consolidation into a single lot.

The proposed activity is located in a prescribed zone and seniors housing can therefore be carried out by the NSW Land and Housing Corporation (LAHC) without consent under the provisions of Chapter 3, Part 5, Division 8 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) as it does not result in more than 40 dwellings on the site and does not exceed 9.5 metres in height.

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

The removal of trees on the site is covered by the definition of consent under Section 6 of the Housing SEPP. It has therefore been incorporated in this Review of Environmental Factors (REF) 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 Ryde 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;
- Ryde 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 12 January 2024. Comments on the response are provided in Section 7.1 of this REF. One submission was received from occupiers of adjoining land. Comments on the submission is provided in Section 7.2 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 within the Activity Determination.

State Environmental Planning Policy Amendment (Housing) 2023

On 14 December 2023, amendments were made to *State Environmental Planning Policy (Housing) 2021* (Housing SEPP). This amending policy is referred to in Schedule 7A Savings and transitional provisions as *State Environmental Planning Policy Amendment (Housing) 2023*.

Clause 8(2) of Schedule 7(A) of Housing SEPP 2021 provides that the amendments made on 14 December 2023 do not apply to an activity by the Land and Housing Corporation where notice of the activity has been provided to Council under section 108C(1)(b)(i) before the amending policy was made and further that the activity is determined before 20 December 2024. This activity for seniors housing satisfies both requirements and therefore *State Environmental Planning Policy Amendment (Housing) 2023* does not apply to this activity. The assessment of this activity has been undertaken against the Housing SEPP that was in force immediately before *State Environmental Planning Policy Amendment (Housing) 2023* was made.

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 the demolition of existing dwellings and structures, removal of trees, and the construction of 10 independent living seniors housing units comprising 5 x 1 bedroom and 5 x 2 bedroom units, with associated landscaping and fencing, surface parking for 5 cars, and consolidation of 2 lots into a single lot at 20-22 Raymond Street, Eastwood.

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 Meccone on behalf of LAHC in satisfaction of the provisions of Part 5 of the *Environmental Planning & Assessment Act 1979* (EP&A Act) and Part 8 of the *Environmental Planning & Assessment Regulation 2021* (EP&A Regulation).

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 Purpose of this Review of Environmental Factors (REF)

The purpose of this REF is to assist LAHC to fulfil its obligations as a determining authority for the proposed activity in accordance with Part 5 of the EP&A Act and Section 171 of the EP&A Regulation by:

- describing the existing environment;
- describing the proposed activity;
- analysing the potential impacts of the activity on the environment;
- identifying measures to mitigate those impacts;
- analysing whether the activity, with the mitigating measures in place, will have a significant impact on the environment; and
- recommending identified requirements to ensure the mitigating measures are implemented if the activity were to proceed.

2.2 Assessment Methodology

The following methodology was applied in undertaking this REF for the proposed development activity under Part 5 of the EP&A Act:

- Section 10.7 Planning Certificates were obtained for each lot comprising the site. The zoning was confirmed against the current applicable environmental planning instrument, which is the *Ryde Local Environmental Plan 2014*;
- it was determined that the subject site is within a prescribed zone and can be carried out 'without consent' under the provisions of the Housing SEPP 2021;

¹ The proposed development is permitted without consent and is therefore subject to environmental impact assessment as an 'activity' under Part 5 of the EP&A Act.

- a desktop analysis and investigation of the site and surrounds was undertaken based on site clearance information provided by LAHC to determine the suitability of the site for the proposed development activity, particularly taking into account the existing site conditions, constraints and local context;
- a site inspection was undertaken;
- relevant local planning controls and State and Commonwealth Government legislation were considered in the environmental assessment of the proposed development activity;
- an environmental impact analysis was undertaken to determine if an Environmental Impact Statement was required;
- potential environmental impacts identified in the analysis and measures to mitigate these impacts were subsequently discussed in the Review of Environmental Factors; and
- identified requirements incorporating the mitigation measures for undertaking the proposed development activity were identified for inclusion in the recommendation for approval of the activity.

3 Existing Site & Locality

3.1 Existing Site and Immediately Adjoining Development

The site is located in the Ryde local government area (LGA) and comprises 2 residential allotments. A location plan is provided at **Figure 1**.

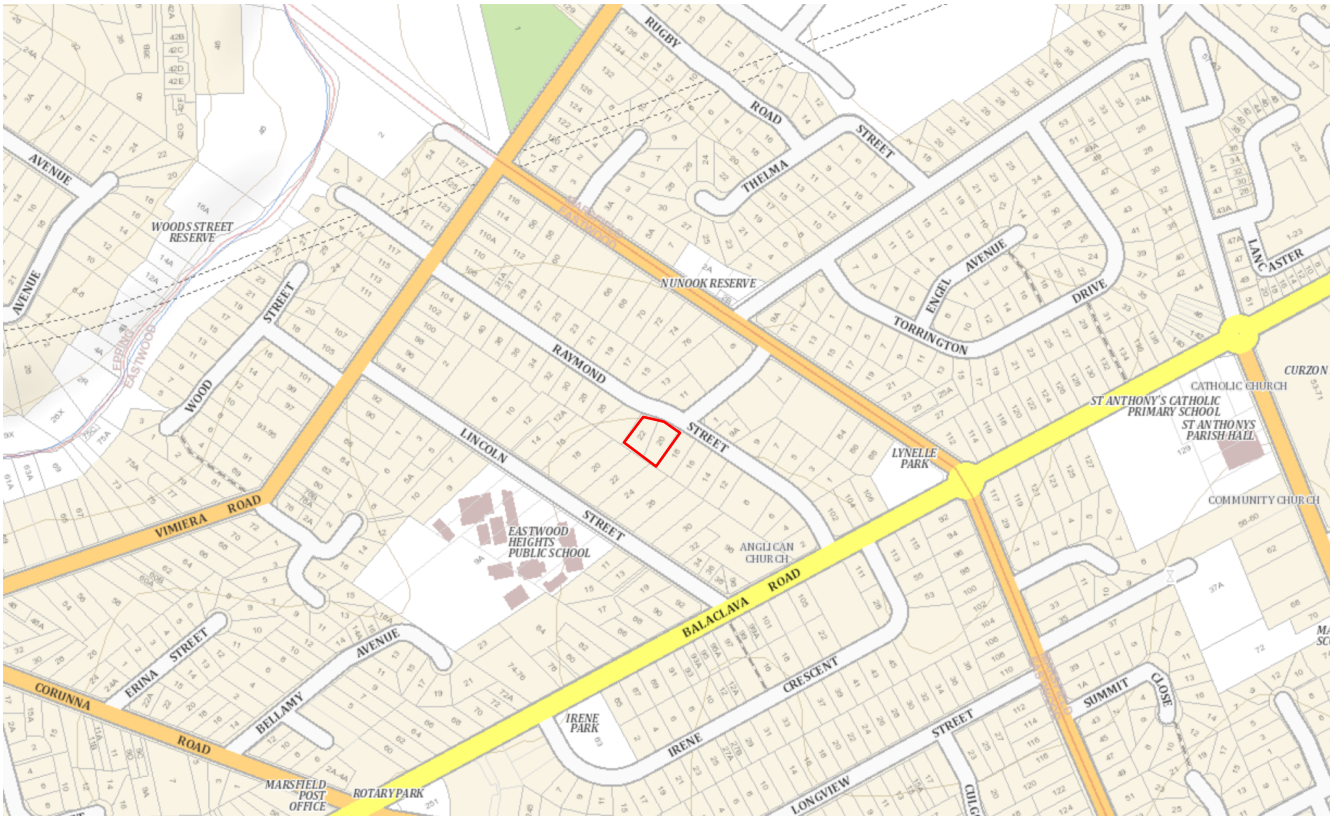


Figure 1 Location Plan (Source: SIX Maps)

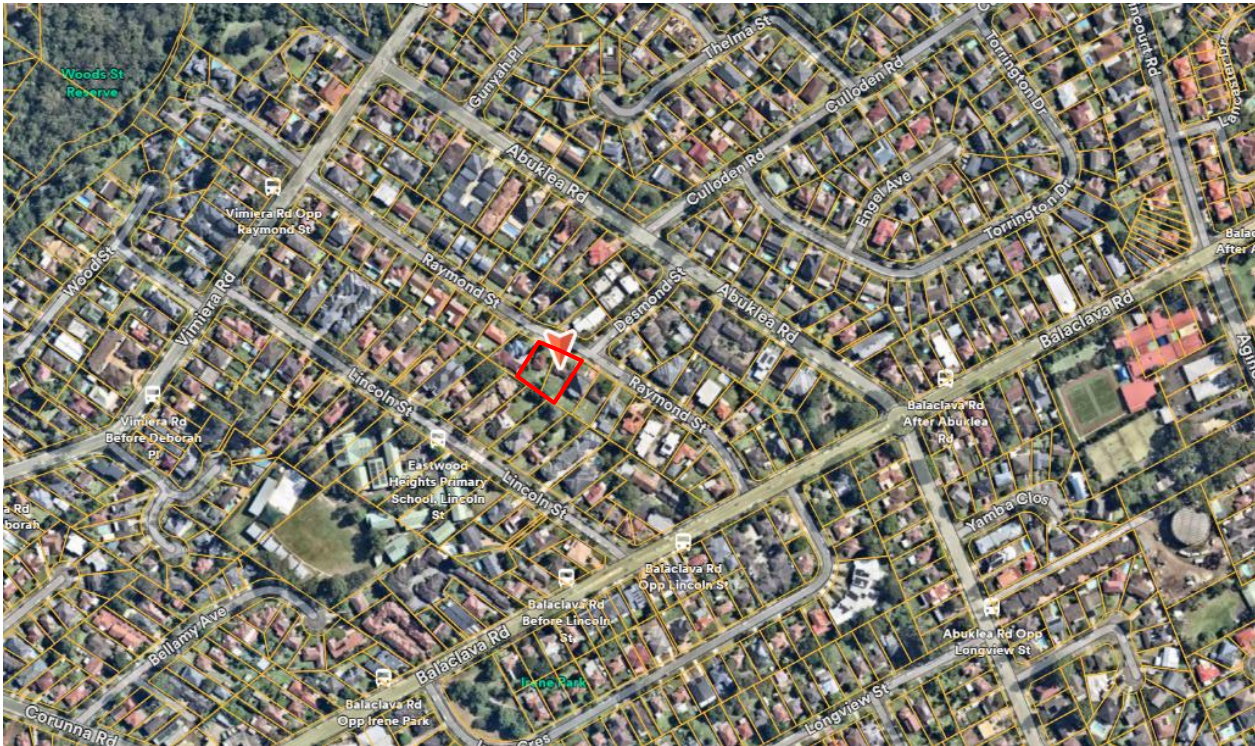


Figure 2 - Aerial Mapping of subject site outlined in red (Source: Nearmap)

The site is currently occupied by 2 single storey brick dwellings with tiled roofs (refer to photographs at **Figure 3** and **Figure 4**).



Figure 3 Development site – 20 Raymond Street (Source: Nearmap, Streetview, December 2023)



Figure 4 Development site – 22 Raymond Street (Source: Nearmap, Streetview, December 2023)

The property immediately to the east (18 Raymond Street) contains a two-storey detached dwelling house (refer photograph at **Figure 5**). The property to the west (24 and 24A Raymond Street) features a single storey, brick attached dual occupancy (refer to photograph at **Figure 6**).



Figure 5 Adjoining development – 18 Raymond Street (Source – Nearmap)



Figure 6 Adjoining development – 24/24A Raymond Street (Source – Nearmap)

3.2 Site Description

Copies of the Section 10.7(2) & (5) Planning Certificates (Nos 4885 and 4886) dated 31 October 2023 are provided in **Appendix F**.

The site has a total area of 1454.55m² by survey calculation (1448m² in DP). It has a frontage to Raymond Street of 37.72m, side (eastern) boundary of 41.76m, side (western) boundary 35m and a rear (southern) boundary of 36.945m (refer to the submitted Detail and Contour Survey Plan in **Appendix D**).

The site falls from the rear boundary down toward the front (northern) boundary approximately 3.5m. An easement for stormwater drainage is not required.

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

There are 19 trees located within the site. Three trees are located within the front setback to Raymond Street, 3 trees are located towards the middle of the site along the western boundary, 1 tree is located in the middle of the site and 12 trees are located towards the rear along the southern boundary.

Water, sewer, electricity, gas and telephone facilities are available to the site (refer to the submitted Detail and Contour Plan for the location of available services at **Appendix D**). Water, electricity and telephone services are located along the road alignment of Raymond Street. The sewer is located at the front boundary of the property, connecting to an inspection manhole situated within the north western corner of the site and is then further connected to the broader sewer network. A stormwater inlet pit is located along the frontage of the site in front of 22 Raymond Street. A power pole and Telstra pit are also located within the road reserve.

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

3.3 Neighbouring Development and Locality

The site is located within an established residential area which is characterised by older style single storey detached dwelling houses of brick construction with tiled roofs interspersed with more recent 2-storey dwelling houses, dual occupancy developments, seniors housing developments and multi dwelling developments (refer to photographs at **Figure 7 – Figure 10**).



Figure 7 More recent dual occupancy development at 7 & 9A Raymond Street (northeast of the site) (Source – Nearmaps)



Figure 8 More recent development at 3-5 Desmond Ave (northeast of the site) (Source – Google Maps)



Figure 9 - Multi-dwelling housing development at 4-6 Lincoln Street (southwest of the site) (Source - Google Maps)



Figure 10 - Recently completed seniors housing development at 8-10 Raymond Street (east of the site) (Source – LAHC)

There are numerous bus stops located within proximity of the site. Two bus stops are located on each side of Balaclava Road between 350m – 375m walking distance to the east of the site (refer to the Long Section Surveys provided at **Appendix D**). Access to these stops is reliant on the completed footpath works undertaken for the recently completed seniors housing development at 8-10 Raymond Street.

These stops are serviced by Sydney Buses Network Routes 544 and 545, in which both routes offer to and from services to train stations, local centres, community facilities and schools. Bus route 544 provides services from Macquarie Park to Auburn via Eastwood whilst bus route 545 provides services from Parramatta to Macquarie Park via Telopea and Eastwood. This is a regular bus service operating daily from 5am to 12am (midnight), with a frequency of one service every 10 minutes (during the morning and evening commuter peak period).

The surrounding land use is predominately residential with other surrounding land uses including open space, educational establishments and commercial development. Eastwood Shopping Centre is located approximately 2.4km south-west of the site comprising of supermarkets, bakery, liquor store, food and drink premises and other retail development. Lynelle Park is located to the east and Eastwood Heights Public School is located south-west of the site.

4 Project Description

The proposed activity can be described as follows.

4.1 Demolition

The proposed activity includes demolition of 2 single storey detached dwelling houses and associated structures, as identified in the Demolition Plan (refer to **Appendix A**).

4.2 Removal of Trees

There are 19 trees currently located within the site and the proposal includes the removal of 17 of those trees. Trees external to the site within the Raymond Street Road reserve will be removed and replaced with 4 additional street trees.

The tree removal within the site boundaries is recommended primarily to accommodate the proposed development or the individual species are recommended for removal as they are not considered to be significant or worthy of retention (refer to submitted Arboricultural Impact Assessment in **Appendix J**). All trees to be removed have been assessed as having low significance and many are exempt species.

More appropriate tree plantings, including trees capable of reaching mature heights of 10m, will be provided as part of the proposed landscaping plan to compensate for the loss of these trees (refer to submitted Landscape Plan in **Appendix B**).

4.3 Proposed Dwellings

The 10 independent living units include a mix of 1 and 2 bedroom units distributed across the ground and first floor. Lift access is provided to the first floor and all units are capable of being adapted to suit persons with a disability should the need arise in the future.

The proposed housing represents a contemporary, high-quality design. The use of face brick for external walls, metal roofing and a subdued colour palette is consistent with the existing and developing character of the locality. Of the 10 proposed units, 6 will address the street (Units 1, 2, 3 on the ground floor and Units 7, 8 and 9 on the first floor) with habitable rooms, living area windows and upper-level balconies facing the street for passive surveillance.

Due to the level changes across the site, cut and fill is required to provide a level building platform. Retaining walls are required, particularly along the driveway access and around the car park to stabilise the site and provide appropriate access grades. Retaining walls proposed are to a maximum height of 1.7m (to private open space of Unit 1) and 1.675m (around ramp to car park) as shown on the Site Plan, Civil Plans and Cut and Fill Plan (refer to **Appendix A** and **Appendix E**).

A variety of new landscape plantings are proposed to offset the proposed tree removal and enhance the appearance of the site. New plantings will consist of a mixture of new trees, shrubs and groundcovers, which will enhance landscaped setbacks and contribute to the streetscape.

Each unit will be provided with its own enclosed private open space area in the form of a paved and landscaped courtyard for ground floor units and a balcony for first floor units. All these spaces are directly accessible from the living areas. The majority of proposed balconies project beyond the main roofline to provide articulation. The roof pitch of the balcony to Unit 6 is proposed to be reduced from 10 degrees to

3 degrees to reduce visual bulk and improve buildability and waterproofing. An identified requirement (No. 78) is recommended in this regard.

A total of 5 surface car parking spaces will be provided on the site, including 2 accessible spaces.

Stormwater will be collected via a series of stormwater pits and gutters on the site connected to a 36.23m³ underground detention tank draining to the existing kerb inlet pit in the road reserve on the site frontage. Roof water will be collected from downpipes and connected to a 12kL underground rainwater tank for recycling with overflow connected to the underground detention tank.

Metal fencing is proposed along the side and rear boundaries to a maximum 1.8m in height. Horizontal metal slat fencing is provided to the private open space areas of each ground floor unit to the side and rear of the site, to a maximum 1.8m in height. A combination of metal picket fencing and brick retaining walls will be provided to private open space areas of ground floor units facing the street.

Figure 11 to Figure 15 include extracts from the architectural plans illustrating the proposed development.

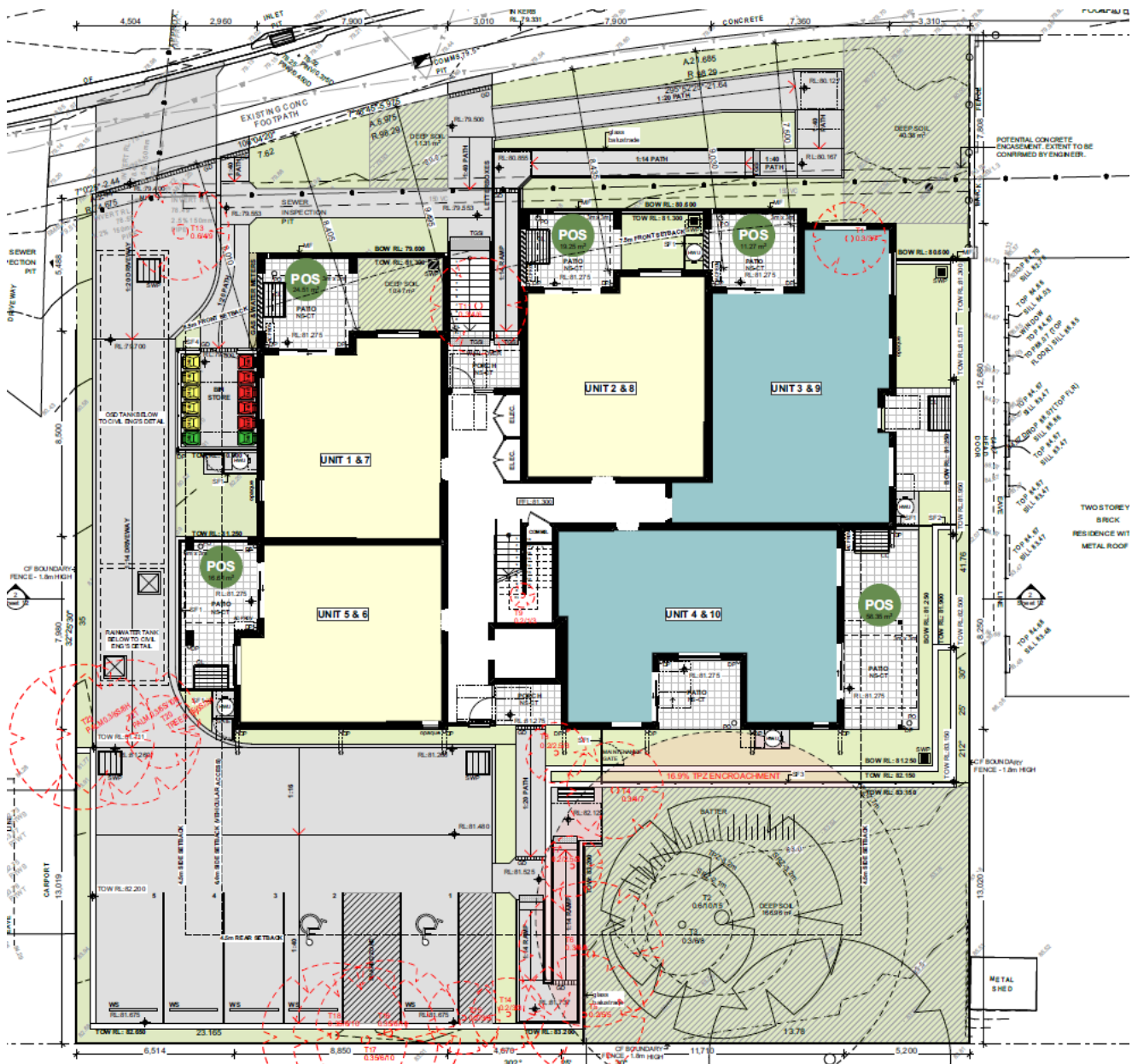


Figure 11 Extract from Architectural Plans – Site Plan (Source: Architectural Plans, DTA Architects, dated 09/10/2023)



Figure 12 Extract from Architectural Plans – Ground Floor Plan (Source: Architectural Plans, DTA Architects, dated 09/10/2023)



Figure 13 Extract from Architectural Plans – First Floor Plan (Source: Architectural Plans, DTA Architects, dated 09/10/2023)



Figure 14 Extract from Architectural Plans – Raymond Street Elevation (Source: Architectural Plans, DTA Architects, dated 09/10/2023)



Figure 15 Extract from Architectural Plans – Raymond Street Perspective (Source: Architectural Plans, DTA Architects, dated 09/10/2023)

4.4 Supporting information

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

Table 1 Supporting information

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd/mm/yyyy]:	Prepared by:
Architectural – Appendix A				
Coversheet	2022.016 Sheet 01 of 16	A	09/10/2023	DTA Architects
Block Analysis Plan	2022.016 Sheet 02 of 16	A	09/10/2023	DTA Architects
Site Analysis Plan	2022.016 Sheet 03 of 16	A	09/10/2023	DTA Architects
Demolition Plan	2022.016 Sheet 04 of 16	A	09/10/2023	DTA Architects
Development Data	2022.016 Sheet 05 of 16	A	09/10/2023	DTA Architects
Site Plan	2022.016 Sheet 06 of 16	A	09/10/2023	DTA Architects
Ground Floor Plan	2022.016 Sheet 07 of 16	A	09/10/2023	DTA Architects
First Floor Plan	2022.016 Sheet 08 of 16	A	09/10/2023	DTA Architects
Roof Plan	2022.016 Sheet 09 of 16	A	09/10/2023	DTA Architects
Elevations – Sheet 1	2022.016	A	09/10/2023	DTA Architects

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
	Sheet 10 of 16			
Elevations – Sheet 2	2022.016 Sheet 11 of 16	A	09/10/2023	DTA Architects
Sections	2022.016 Sheet 12 of 16	A	09/10/2023	DTA Architects
Shadow Diagrams (21 June)	2022.0156 Sheet 13 of 16	A	09/10/2023	DTA Architects
Solar Access – View from Sun	2022.016 Sheets 14 & 15 of 16	A	09/10/2023	DTA Architects
Perspective Images	2022.016 Sheet 16 of 16	A	09/10/2023	DTA Architects
Landscape Plan – Appendix B				
Landscape Plan	2022.016 Sheet 1 of 1	B	22/01/2024	Ray Fuggle & Associates Pty Ltd
Civil Plans – Appendix C				
Standard Notes	Job No. 22142 Sheet 1 of 6	E	31/01/2024	MSL Consulting Engineers
Roof Drainage Plan	Job No. 22142 Sheet 2 of 6	E	31/01/2024	MSL Consulting Engineers
Site Drainage Plan	Job No. 22142 Sheet 3 of 6	E	31/01/2024	MSL Consulting Engineers
Stormwater Details	Job No. 22142 Sheet 4 of 6	E	31/01/2024	MSL Consulting Engineers
OSD/RW Tank Section and Stormwater Details	Job No. 22142 Sheet 5 of 6	E	31/01/2024	MSL Consulting Engineers
Sediment & Erosion Control Plan	Job No. 22142 Sheet 6 of 6	E	31/01/2024	MSL Consulting Engineers
Detail and Contour Survey – Appendix D				
Detail and Contour Survey	Sheet 1 of 3 [sic]	D	04/08/23	RPS Group
Detail and Contour Survey – Cross Sections	Sheet 2 of 3 [sic]	D	04/08/23	RPS Group
Detail and Contour Survey - Longitudinal Sections to Nearest Bus Stops	Sheet 3 of 4	D	04/08/23	RPS Group
Detail and Contour Survey – Longitudinal Sections to Nearest Bus Stops	Sheet 4 of 4	D	04/08/23	RPS Group
Notification Plans – Appendix E				
Cover Page	Sheet N01	A	09/10/2023	DTA Architects
Site & Landscape Plan	Sheet N02	A	09/10/2023	DTA Architects
Development Data	Sheet N03	A	09/10/2023	DTA Architects
Elevations	Sheet N04	A	09/10/2023	DTA Architects
Schedule of Finishes	Sheet N05	A	09/10/2023	DTA Architects
Shadow Diagrams	Sheet N06	A	09/10/2023	DTA Architects

Title / Name:	Drawing No. / Document Ref	Revision / Issue:	Date [dd.mm.yyyy]:	Prepared by:
Access Report – Appendix H				
Access Report	22151-DA	R1.2	18/10/2023	AI Consultants
AHIMS Web Search – Appendix I				
AHIMS search – 20 Raymond Street	-	-	30/10/2023	NSW Government
AHIMS search – 22 Raymond Street	-	-	30/10/2023	NSW Government
Arboricultural Impact Assessment and Tree Management Plan – Appendix J				
Arboricultural Impact Assessment and Tree Management Plan	-	-	23/10/2023	Advanced Treescape Consulting
BASIX – Appendix K				
BASIX Certificate	1389777M_02	-	23/10/2023	Greenview Consulting
BCA report – Appendix L				
BCA Compliance Assessment	P230072	-	16/10/2023	BCA Vision
NatHERS Certificate – Appendix N				
NatHERS Certificate	0009014780	-	23/10/2023	Greenview Consulting
Geotechnical Investigation Assessment - Appendix P				
Geotechnical Investigation Assessment	10530/2802	-	10/11/2014	SMEC Testing Services Pty Ltd
Waste Management Plan – Appendix R				
Waste Management Plan	-	-	08/09/2023	DTA Architects
Traffic Impact Assessment - Appendix S				
Traffic Impact Assessment	-	3	12/10/2023	Park Transit

Section 10.7 Planning Certificates – Appendix F

Lot 34 DP 35375, dated 31 October 2023 – City of Ryde Council

Lot 35 DP 35375, dated 31 October 2023 – City of Ryde Council

Design compliance and checklists – Appendix M

Architect's Certificate of Building Design Compliance – DTA Architects, dated 08/04/2024

Certificate of Landscape Documentation Compliance – Ray Fuggle & Associates Pty Ltd, dated 18/10/2023

Certificate of Stormwater Documentation Compliance – MSL Consulting Engineers, dated 17/10/2023

Housing for seniors checklist – Appendix O

Seniors Living Urban Design Guidelines, LAHC Design requirements & Good design for social housing, prepared by DTA Architects, undated.

Titles and Deposited Plans – Appendix Q

Title Search, Folio: 34/35375, Search date 20.4.2023, First Schedule: New South Wales Land and Housing Corporation

Title Search, Folio: 35/35375, Search date 20.4.2023, First Schedule: New South Wales Land and Housing Corporation

5 Zoning and Permissibility

The site is zoned R2 Low Density Residential under *Ryde Local Environmental Plan 2014* (Ryde LEP 2014) (**Figure 16**). The proposed development is defined as 'seniors housing' under the provisions of Ryde LEP 2014 and is prohibited in the R2 zone.

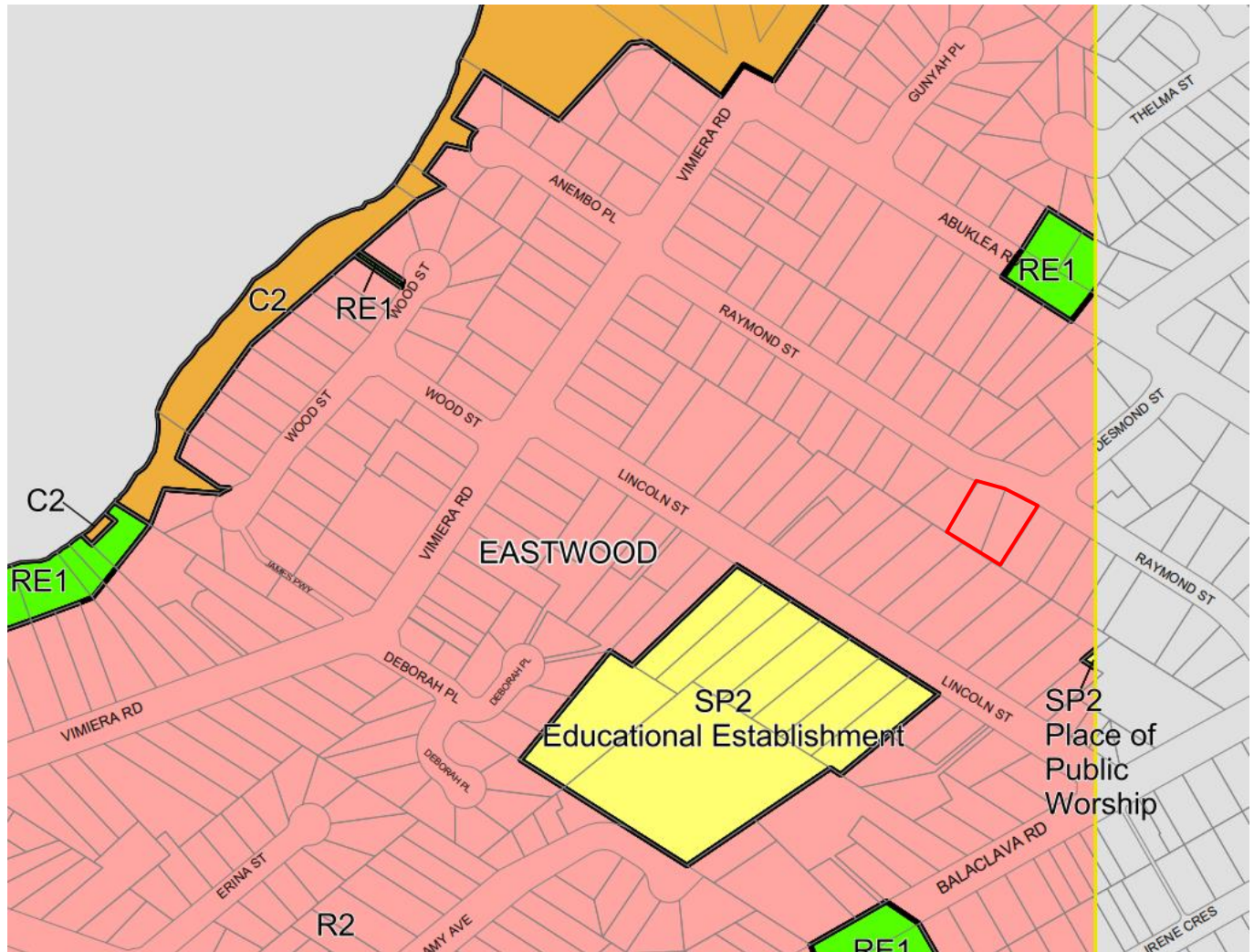


Figure 16 Land zoning map (Source: Ryde LEP Land Zoning Mapping)

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

The relevant objectives of the R2 zone, as set out in Ryde LEP 2014 are:

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

The proposed development provides seniors housing that meets the identified needs of the community and includes a mix of 1 and 2 bedroom units. The proposal has also been sympathetically designed to fit within its context and complement the surrounding area. The proposed seniors housing contributes towards providing

additional housing diversity in the Eastwood area. The proposal is therefore consistent with the relevant objectives of the R2 zone.

Section 108B of the Housing SEPP permits seniors housing development to be carried out by LAHC as 'development without consent' subject to the provisions set out under that section. Table 5 in subsection 6.5.1 of this REF demonstrates compliance with the relevant provisions of Chapter 3 Part 5 Division 8 of the SEPP.

6 Planning and Design Framework

6.1 Environmental Planning and Assessment Act 1979

6.1.1 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 2 below demonstrates the effect of the proposed development activity on the matters listed for consideration in subsection 3 of Section 5.5.

Table 2 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
Sub-section 3 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.	No effect, as the site and surrounding areas are not within a wilderness area (within the meaning of the <i>Wilderness Act 1987</i>).

6.2 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.

6.3 Other Acts

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

6.4 Environmental Planning and Assessment Regulation 2021

6.4.1 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 3** and Error! Reference source not found. 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 3 Environmental Planning and Assessment Regulation 2021 [Section 171]

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 EPA regulation 2021

Table 4 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;	NA			
(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	

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]
(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 Section 6.4.2		x	
(r) other relevant environmental factors.	Yes – discussed in Section 8.	x	x	

Note 1: A 'significant' impact will trigger the need for 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 seniors housing development is not expected to generate any significant or long-term impacts on the environment. The short-term impacts, during construction, will be offset by positive social outcomes in the long-term social benefits of providing affordable housing that meets the needs of the community. The applicable Local Strategic Planning Statement (LSPS) and Community Strategic Plan are considered below at Section 6.4.2 of this report.

6.4.2 Strategic Planning Framework

Planning Ryde – Local Strategic Planning Statement

The *Planning Ryde Local Strategic Planning Statement* was endorsed by Ryde Council in March 2020. It is a 20 year plan that identifies key planning priorities for the LGA, focused around infrastructure, collaboration, liveability, productivity and sustainability.

Notably, Priority H1 seeks to deliver housing supply to satisfy housing needs to 2039, in areas which are well serviced by public transport and community infrastructure. Priority H3 seeks to protect the character of low density residential areas, aiming to strike a balance between maintaining valued local character and providing appropriate opportunities for medium density outcomes.

The proposed development of 10 seniors housing units provides a valuable contribution towards housing supply, introducing a new housing option to accommodate the ageing population in the locality and is well serviced by existing public transport options. The design response is sympathetic to the existing low density character, consistent with the objectives of the Local Strategic Planning Statement.

Ryde 2028 Community Strategic Plan

The Ryde 2028 Community Strategic Plan was published by Council in March 2018. It is a 10 year plan that outlines 7 broad inter-related themes that are derived from an extensive community engagement process, which identified priorities for the community's future. Under the 7 themes there are key goals and subsequent strategies for Council to facilitate in partnership with the community, government agencies and business. These 7 key strategic directions are supported by key goals that will guide the Ryde area in the next 10 years. The themes are focused around:

- Our vibrant and liveable city;
- Our active and healthy city;
- Our natural and sustainable city;
- Our smart and innovative city;
- Our connected and accessible city;
- Our diverse and inclusive city;
- Our open and progressive city.

The plan recognises that the number of people reaching retirement age within the LGA will increase by 60% over the life of the plan and that accessible housing is needed for these populations as they get older. As noted above, the development will contribute to a greater supply of housing for seniors while responding to the low density character and maintaining local amenity.

6.4.3 Activities in catchments [Section 171A]

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

LAHC, as 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.

An assessment of these controls on development is provided in **Table 111** of this REF. The assessment concludes that the proposed activity is unlikely to significantly impact the Sydney Harbour Catchment.

6.5 State Environmental Planning Policy (Housing) 2021

State Environmental Planning Policy Amendment (Housing) 2023

On 14 December 2023, amendments were made to State Environmental Planning Policy (Housing) 2021 (Housing SEPP). This amending policy is referred to in Schedule 7A Savings and transitional provisions as State Environmental Planning Policy Amendment (Housing) 2023.

Clause 8(2) of Schedule 7(A) of Housing SEPP 2021 provides that the amendments made on 14 December 2023 do not apply to an activity by the Land and Housing Corporation where notice of the activity has been provided to Council under section 108C(1)(b)(i) before the amending policy was made and further that the activity is determined before 20 December 2024. This activity for seniors housing satisfies both requirements and therefore State Environmental Planning Policy Amendment (Housing) 2023 does not apply to this activity. The assessment of this activity has been undertaken against the Housing SEPP that was in force immediately before State Environmental Planning Policy Amendment (Housing) 2023 was made.

6.5.1 Development without Consent

Demolition

The proposed activity includes demolition of existing structures on the site. Section 42(2)(a) of the Housing SEPP permits LAHC to undertake demolition as “*development without consent*” provided the land the structures are located on is “*non-heritage land*” and is not “*identified in an environmental planning instrument as being within a heritage conservation area*”. The subject site contains neither of these heritage notations and

therefore demolition can be undertaken by LAHC as “*development without consent*”. A waste management plan has been prepared, and there are several Identified Requirements recommended in the Activity Determination which deal with site safety and environmental protection during demolition and construction.

Further, the notification requirements of section 43 of the Housing SEPP mimic those in 108C of the Housing SEPP. Details with compliance with 108C are detailed in table 5 below.

Development for Seniors Housing

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

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

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

Provision	Compliance
108A – Development to which Division applies This Division applies to development for purposes of senior housing involving the erection of a building on land -	
(a) on which development for purposes of seniors housing is permitted with consent under another environmental planning instrument, or	The development is not permissible within the R2 Low Density Residential zone under the RLEP 2014.
(b) in a prescribed zone or an equivalent land use zone.	The R2 zone is a prescribed zone under the SEPP. Chapter 3, Part 5, Division 8 of the SEPP therefore applies.
108B – Seniors housing permitted without development consent (1) Development to which this Division applies may be carried out by or on behalf of a relevant authority without development consent if -	
(a) the relevant authority has considered the applicable development standards specified in sections 84(2)(c)(iii), 85, 88, 89 and 108, and	Consideration of the development standards are provided in Table 6 and Table 77 below.
(b) the development will not result in a building with a height of more than- (i) 9.5m, or (ii) 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, and	The maximum building height is 8.75m.
(c) the seniors housing will not contain more than 40 dwellings on the site.	The development is for 10 dwellings on the site.
(2) <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> , sections 2.15 and 2.17 apply to the development and, in the application of the clauses –	Sections 2.15 and 2.17 of <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> not applicable to the site or development.
(a) a reference in section 2.15 to “this Chapter” is taken to be a reference to this section, and	Noted.

Provision	Compliance
(b) a reference in the sections to a public authority is taken to be a reference to the relevant authority.	Noted.
108C – Requirements for carrying out seniors housing (1) Before carrying out development to which this Division applies, a relevant authority must –	
(a) request the council to nominate a person or persons who must, in the council's opinion, be notified of the development, and	Advice was sought from City of Ryde Council regarding additional persons or properties that should be notified of the development via an email sent to Council on 24 April 2023. Council provided a response on 27 April 2023 advising that the extent of notification is considered satisfactory. City of Ryde Council were asked to reconfirm the scope and provide owners details on 26 October 2023, which they did on 22 November 2024.
(b) give written notice of the intention to carry out the development to – (i) the council, and (ii) the person or persons nominated by the council, and (iii) the occupiers of adjoining land, and	A letter notifying City of Ryde Council of the proposed development activity was sent by LAHC on 23 November 2023. Letters notifying occupiers and owners of adjoining land and those properties nominated by council of the proposed development activity were sent by LAHC on the same date.
(c) take into account the responses to the notice that are received within 21 days after the notice is given, and	Council responded to LAHC's notification by letter dated 12 January 2024. Comments on the response are provided in Section 7.1 of this REF. One submission, in the form of a phone call, was received from adjoining owners or occupiers. Comments on the submission are provided in Section 7.2 of this REF.
(d) take into account the relevant provisions of the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i> , published by the Department in March 2004, and	Refer to checklist in Appendix O and subsection 6.5.3 of this REF. These conclude that the development complies with all relevant development standards relating to the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i> with the exception of the minor variations discussed in subsection 6.5.3 of this report. In these cases, suitable alternatives are proposed which are necessary due to site specific constraints, site and locality characteristics and specific LAHC design requirements and policies.
(d1) if the relevant authority is the Aboriginal Housing Office – consider the relevant provisions of the <i>Aboriginal Housing Design Guidelines</i> , published by the Aboriginal Housing Office in January 2020, and	Not applicable.
(e) if the relevant authority is the Land and Housing Corporation – consider the relevant provisions of – (i) <i>Good Design for Social Housing</i> , published by the Land and Housing Corporation in September 2020, and (ii) the <i>NSW Land and Housing Corporation Design Requirements</i> , published by the Land and Housing Corporation in February 2023, and	Refer to subsections 6.5.4 and 6.5.5 of this REF and the Architect's Statement and Certificate of Building Design Compliance in Appendix M which indicate that the design and dwelling requirements have been considered.

Provision	Compliance
(f) consider the design principles set out in Division 6	Consideration of these principles is discussed in Table 10 .
(2) In this section, a reference to the council is a reference to the council for the land on which the development is proposed to be located.	Noted.
108D - Exempt development Development for purposes of landscaping and gardening is exempt development if it is carried out by or on behalf of a relevant authority in relation to seniors housing	Noted
108E - Subdivision of seniors housing not permitted Development consent must not be granted for subdivision of seniors housing.	No subdivision proposed.

The Housing SEPP requires LAHC to consider the applicable development standards specified in sections 84(2) (c) (iii), 85, 88, 89 and 108. Consideration of these sections of the SEPP is demonstrated in the **Table 6** and **Table 7** below.

Table 6 Compliance with section 84(2) (c) (iii), 85, 88, 89 of the Housing SEPP 2021

Provision	Compliance
84 Development standards — general (2) Development consent must not be granted for development to which this section applies unless — (c) for development on land in a residential zone where residential flat buildings are not permit (iii) if the development results in a building with more than 2 storeys — the additional storeys are set back within planes that project at an angle of 45 degrees inwards from all side and rear boundaries of the site.	Proposed development is in R2 zone where residential flat buildings are not permitted. NA. Proposed development is 2 storey only.
85 Development standards for hostels and independent living units (1) Development consent must not be granted for development for the purposes of a hostel or an independent living unit unless the hostel or independent living unit complies with the relevant standards specified in Schedule 4. (2) An independent living unit, or part of an independent living unit, located above the ground floor in a multi-storey building need not comply with the requirements in Schedule 4, sections 2, 7–13 and 15–20 if the development application is made by, or by a person jointly with, a social housing provider. Note — Development standards concerning accessibility and usability for residential care facilities are not specified in this Policy. For relevant standards, see the Building Code of Australia.	The proposed development complies with relevant standards specified in Schedule 4 as demonstrated in Table 8 below. Noted.

Provision	Compliance
<p>88 Restrictions on occupation of seniors housing</p> <p>(1) Development permitted under this Part may be carried out for the accommodation of only the following —</p> <p>(a) seniors or people who have a disability,</p> <p>(b) people who live in the same household with seniors or people who have a disability,</p> <p>(c) staff employed to assist in the administration and provision of services to housing provided under this Part.</p> <p>(2) Development consent must not be granted under this Part unless the consent authority is satisfied that only the kinds of people referred to in subsection (1) will occupy accommodation to which the development relates.</p>	Complies. An Identified Requirement No. 74 is recommended to ensure compliance.
<p>89 Use of ground floor of seniors housing in business zones</p> <p>(</p>	Not applicable. The proposed development is in an R2 low density residential zone.

Table 7 Non-Discretionary standards for Independent Living units (Section 108)

Development Standard	Required	Comment
Building Height:	9.5m or less	Maximum height 8.75m
Density and Scale:	Floor Space Ratio 0.5:1 or less	0.54:1, however non-compliance does not result in any adverse impacts on adjoining properties or the streetscape (refer to variation discussion below).
Landscaped Area:	Minimum 35m ² per dwelling (10 x 35m ² = 350m ²)	437m ²
Deep Soil Zone:	Minimum 15% of area of site (15% x 1,448m ² = 217.2m ²)	230.6m ² or 15.9%
	Minimum 65% to be preferably located at rear of site (65% x 217.2m ² = 141.18m ²)	167m ² or 76.7% provided at rear of site
	Minimum dimension 3m	Minimum dimension 3m
Solar Access:	70% of living areas & main private open space to receive minimum 2 hrs direct solar access between 9 am and 3 pm at mid-winter	9/10 (90%) living areas achieve 2 hours solar access mid winter. 9/10 (90%) private open space areas achieve 2 hours solar access mid winter.
Private Open Space:	Ground level:	
	Minimum 15m ² per dwelling	Minimum 16.6m ²
	One area minimum 3m x 3m, accessible from living area	Minimum 3m x 3m
	Upper level/s:	
	1 bedroom:	

Development Standard	Required	Comment
	Minimum 6m ² Minimum dimensions 2m	Minimum 9.9m ² Minimum 2m
	2 or more bedrooms: Minimum 10m ² Minimum dimensions 2m	Minimum 10.16m ² Minimum 2m
Car parking:	Minimum 1 car parking space for each 5 dwellings (LAHC concession) – 2.4 car parking spaces required	5 car parking spaces for 10 dwellings, including 2 accessible spaces

Non-Compliance with FSR Standard

The development proposes a total gross floor area (GFA) of 780.15m² calculated in accordance with the definition in section 82 of the Housing SEPP. This translates to an FSR of 0.54:1 and represents an exceedance of 56.15m² to the 0.5:1 FSR development standard provided in section 108(2)(c) of the SEPP.

In this instance it is considered that the density of the development is still appropriate and compatible with the development site and locality. That is, despite this minor exceedance, it is considered the bulk and scale of the proposed development is compatible with the emerging character of the locality, maintains appropriate visual relationships with the existing area, will not adversely affect the streetscape, skyline or landscape, and does not result in adverse environmental effects on adjoining lands, as demonstrated below.

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

- appropriate setbacks and building separation to reflect the nature of existing detached development within the locality;
- significant landscaping within the site, particularly to front and rear setbacks to provide a visual and acoustic buffer;
- provision of considered dwelling layouts, including the careful placement and sizes of window/door openings, the treatment of windows and balconies with privacy screens and substantial buffer landscaping along boundaries to ensure no overlooking of adjoining residential private open space areas or living areas occurs;
- ensuring dwellings are provided with a high level of amenity demonstrated through compliance with the seniors housing design principles and standards prescribed by the Housing SEPP, e.g. high levels of solar access, natural ventilation, accessibility etc;
- materials and finishes including brick walls and sheet metal roofing are similar to the materials and finishes of recent developments in the street with a variety of materials used for external walls, balcony balustrades and external privacy screens to add visual interest to the development; and
- the development has been stepped along the frontage and includes landscaped deep soil zones to minimise the bulk and scale of the development.

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

The proposed development will also not generate any significant adverse amenity impacts on surrounding properties in terms of overlooking or overshadowing. Shadows cast as a result of the proposed development to the adjoining property to the west (24 Raymond Street) will be confined to the morning period. No solar impact will be generated to development south of the site due to the substantial rear setback provided. The proposed deep soil zone at the rear of the site will achieve reasonable solar access throughout the day. The property to the east will receive adequate solar access in the morning and midday periods with solar impacts to the western elevation of the dwelling at 18 Raymond Street limited to the afternoon. The proposal therefore generates no unacceptable solar impacts to surrounding development.

The proposed development accommodates the variation to FSR while providing appropriate side setback and building separation between adjacent development. Adequate side setbacks are provided to mitigate overlooking and privacy impacts with perimeter landscaping to be implemented to further soften the built form.

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

- contributes to the increase in supply of suitable accommodation for seniors;
- meets the current and future accommodation needs of Sydney's ageing population;
- delivers a well-designed development which reflects and enhances the locality while providing a reasonable level of amenity for residents;
- provides seniors accommodation close to existing infrastructure;
- is well located to public transport connections.

The proposed exceedance of the floor space ratio therefore has significant environmental benefits as the development increases the supply of seniors housing while positively contributing to the streetscape and surrounding area. Given the above, the minor numerical non-compliance in relation to FSR is supportable.

6.5.2 Development standards for Accessibility

Consideration of the development standards for accessibility set out in section 85 and Schedule 4 is demonstrated in **Table 8** below.

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

Table 8 Accessibility and useability standards [Schedule 4]

Development Standard (Sch 4)	Required	Comment
2.Siting Standards:		
Wheelchair access 'Non-sloping' sites i.e. with gradients entirely <1:10	100% of ground floor dwellings to have wheelchair access by a continuous accessible path of travel as per AS 1428.1 to an adjoining public road	100% of ground floor units have accessible paths of travel in accordance with AS1428.1 to the front boundary as confirmed by the submitted Access Report prepared by Ai Consultancy (Appendix H).
'Sloping' sites i.e. with gradients entirely or partially >1:10	% of ground floor dwellings, equal to % of site with gradient <1:10 or minimum 50% (whichever is greater), to have wheelchair access by a continuous accessible path of travel as per	Not applicable, as the site does not have a gradient of more than 1 in 10.

	AS1428.1 to driveway or public road that is accessible to all residents	
Common areas	All common areas and facilities to have wheelchair accessibility as per AS1428.1	All common areas have accessible paths of travel in accordance with AS1428.1 as confirmed by the submitted Access Report prepared by Ai Consultancy (Appendix H).
3. Security:		
Pathway lighting	Pathway lighting to be designed and located to avoid glare for pedestrians and adjacent dwellings and to provide min 20 lux at ground level	All lighting will be designed as per requirements at construction documentation stage (subject to Identified Requirement No. 75). Compliance is readily achievable as per the submitted Access Report prepared by Ai Consultancy (Appendix H).
4. Letterboxes:		
	To be lockable, located in central location adjacent to street entry or in one or more central locations on a hard standing area and have wheelchair access and circulation by a continuous path of travel (as per AS1428.1)	Letterboxes have been provided at the centralised pedestrian entry at ground floor. Further details to be provided at construction documentation stage but compliance is readily achievable as per the submitted Access Report prepared by Ai Consultancy (Appendix H).
5. Private car accommodation:		
Disabled car parking	Car parking spaces must comply with the requirements for parking for persons with a disability set out in AS2890 and at least 10% of the total number of car parking spaces (or at least 1 space if there are fewer than 10 spaces) must be designed to enable the width of the spaces to be increased to 3.8m	2 accessible car parking spaces have been provided, which meet the requirements of AS2890.6.1 car-parking space is capable of being widened to 3.8m. Compliance indicated as per the submitted Access Report prepared by Ai Consultancy (Appendix H).
Garages	Must have power-operated door or there must be a power point and an area for motor or control rods to enable a power-operated door to be installed at a later date.	Not applicable, as the proposal does not incorporate garages.
6. Accessible entry		
Every entry, whether front entry or not:	Must comply with clauses 4.3.1 and 4.3.2 of AS4299	Entry doors have adequate landings, clear opening widths and circulation. Compliance indicated as per the submitted Accessibility Report prepared by Ai Consultancy (Appendix H).
7. Interior: general		
Note: consideration only required for ground floor units in accordance with clause 85(2)		
	Internal doorways must have a minimum clear opening that complies with AS1428.1	Capable of Compliance Door circulation and corridors are suitably wide, with compliance indicated as per the submitted

Internal corridors must have a minimum unobstructed width of 1,000mm

Circulation space at approaches to internal doorways must comply with AS1428.1

Accessibility Report prepared by Ai Consultancy (**Appendix H**).

Details will be required to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance.

8. Bedroom

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

At least one bedroom within each dwelling must have:

- (a) an area sufficient to accommodate a wardrobe and a bed sized as follows:
 - (i) in the case of a dwelling in a hostel-a single - size bed,
 - (ii) in the case of a self-contained dwelling - a queen size bed, and
- (b) a clear area for the bed of at least:
 - (i) 1,200mm wide at the foot of the bed, and
 - (ii) 1,000mm wide beside the bed between it and the wall, wardrobe or any other obstruction, and
- (c) 2 double general power outlets on the wall where the head of the bed is likely to be, and
- (d) at least 1 general power outlet on the wall opposite the wall where the head of the bed is likely to be, and
- (e) a telephone outlet next to the bed on the side closest to the door and a general power outlet beside the telephone outlet, and
- (f) wiring to allow a potential illumination level of at least 300 lux

Capable of compliance.
Bedroom designs provide suitable layouts

Details will be required to be verified at construction documentation stage specifically in relation to subclauses (c) to (f).

Identified Requirement No. 73 imposed to ensure compliance

9. Bathroom

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

At least 1 bathroom within a dwelling must be on the ground (or main) floor and have the following facilities arranged within an area that provides for circulation space for sanitary facilities in accordance with AS1428.1:

- (a) a slip-resistant floor surface,
- (b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS1428.1,
- (c) a shower that complies with AS1428.1, except that the following must be accommodated either immediately or in the future:

Capable of compliance.
Bathroom designs provide suitable layouts subject to further review at the construction documentation stage specifically in relation to subclauses (1)(a) to (e).

Identified Requirement No. 73 imposed to ensure compliance

- (i) a grab rail,
- (ii) portable shower head,
- (iii) folding seat,
- (d) a wall cabinet that is sufficiently illuminated to be able to read the labels of items stored in it,
- (e) a double general power outlet beside the mirror

The requirement under item (c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility

10. Toilet

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

A dwelling must have at least 1 toilet on the ground (or main) floor and be a visitable toilet that complies with the requirements for sanitary facilities of AS4299

All toilets are readily capable of compliance as indicated per the submitted Accessibility Report prepared by Ai Consultancy (**Appendix H**).

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance

11. Surface finishes

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

Balconies and external paved areas must have slip-resistant surfaces

Capable of compliance.

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance

12. Door Hardware

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

Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS4299

Capable of compliance.

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance.

13. Ancillary Items

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

Switches and power points must be provided in accordance with AS4299

Capable of compliance.

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance

15. Living and dining room

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

A living room in a self-contained dwelling must have:

(a) a circulation space in accordance with clause 4.7.1 of AS4299, and

(b) a telephone adjacent to a general power outlet.

A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux

Capable of compliance.

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance

16. Kitchen

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

A kitchen in a self-contained dwelling must have:

(a) a circulation space in accordance with clause 4.5.2 of AS4299, and

(b) a width at door approaches complying with clause 7 of this Schedule, and

(c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS4299:

(i) benches that include at least one work surface at least 800mm in length that comply with clause 4.5.5 (a),

(ii) a tap set (see clause 4.5.6),

(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,

(iv) an oven (see clause 4.5.8), and

(d) "D" pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and

(e) general power outlets:

(i) at least one of which is a double general power outlet within 300mm of the front of a work surface, and

(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed

The Access Report prepared by Ai Consultancy refers to a separate marked-up plan contained in the report in relation to kitchen spaces for individual units. Further confirmation was therefore sought in which Ai Consultancy confirmed that the referenced plan is not applicable, and the kitchen circulation is capable of compliance, subject to detailed design plans

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance

17. Access to kitchen, main bedroom, bathroom and toilet

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

In a multi-storey self-contained dwelling, the kitchen, main bedroom, bathroom and toilet must be located on the entry level

Not applicable, as dwellings are not multi-storey.

18. Lifts in Multi storey buildings

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

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

Not applicable, as application is made on behalf of a Social Housing Provide, however a lift is provided.

19. Laundry

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

A self-contained dwelling must have a laundry that has:

- (a) width at door approaches that complies with cl.7 of this Schedule, and
- (b) provision for the installation of an automatic washing machine and a clothes dryer, and
- (c) a clear space in front of appliances of at least 1,300mm, and
- (d) a slip-resistant floor surface, and
- (e) an accessible path of travel to any clothes line provided in relation to the dwelling

Laundries are located within bathrooms and are capable of compliance

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance.

20. Storage for Linen

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

A self-contained dwelling must be provided with a linen storage in accordance with Clause 4.11.5 of AS 4299

Linen storage (min 600mm wide) is to be provided to each unit. Linen storage is capable of compliance

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance.

21. Garbage

A garbage storage area must be provided in an accessible location.

A garbage enclosure has been provided on the western elevation within an accessible location. Compliance indicated as per the submitted Accessibility Report prepared by AI Consultants.

Details to be verified at construction documentation stage.

Identified Requirement No. 73 imposed to ensure compliance.

6.5.3 Seniors Living Policy: Urban Design Guidelines for Infill Development

The *Seniors Living Policy: Urban Design Guidelines for Infill Development* (SLUDG) (March 2004) has been prepared to assist in the design and assessment of applications for development under the Housing SEPP and is used for all Part 5 applications, excluding group homes and boarding houses.

The SLUDG outlines the design issues, principles and better practices that must be considered when designing a development for assessment under the Housing SEPP. There are 5 sections in the document, each corresponding to a key issue when designing development under the Housing SEPP. These include:

- Improving neighbourhood fit
- Improving site planning and design
- Reducing impacts on streetscape
- Reducing impacts on neighbouring properties; and
- Improving internal site amenity.

Section 108C(1)(d) of the Housing SEPP requires the relevant authority to take into account the relevant provisions of the SLUDG when assessing a proposed seniors housing development under Chapter 3, Part 5, Division 8 of the Housing SEPP.

An assessment of the design of the activity against the SLUDG is provided at **Appendix O**. The design has followed the Guidelines, except in relation to the following justifiable departures outlined in **Table 9**.

Table 9 Seniors Living Urban Design Guidelines departures

Guideline Requirement	Response
2.07 Retain trees and planting on the street and in front setbacks to minimise the impact of new development on the streetscape?	A total of 3 trees within the front setback are proposed to be removed to accommodate the new driveway crossover and proposed building envelope. To compensate for the loss of the trees, 3 replacement trees are proposed to be planted within the front setback of the property. With the additional street trees proposed to be planted within the road reserve, the overall canopy cover is considered appropriate as a result of the proposed development.
2.20 Use Semi Pervious materials for driveways, paths and other paved areas.	Driveways and paths are concrete to meet LAHC maintenance and durability requirements.
3.06 Setback upper levels behind the front building facade	Increases to the first floor setback were not considered necessary to reduce visual bulk as the proposal is only two storeys in height. Visual bulk of the development has been minimised by providing a well-considered landscaping scheme and through the inclusion of architectural design elements in the façade such as the provision of balconies that provide relief to the first floor façade, variations in the building materials and modulation/variations in the façade setback.
3.22 Vary the alignment of driveways to avoid a 'gun barrel' effect.	Landscaping is employed to soften and reduce the visual impact of the driveway. Car parking spaces are located to the rear behind the building.

Guideline Requirement	Response
3.24 Consider alternative site designs that avoid driveways running the length of the site.	Car parking spaces are located to the rear behind the building. The main driveway is located along the side boundary. Landscaping is provided to the side and rear of the driveway to reduce the visual impact.
3.27 Vary the driveway surface material to break it up into a series of smaller spaces? (eg to delineate individual dwellings).	Driveways and paths are concrete to meet LAHC maintenance and durability requirements. Parking is not allocated to individual units.
3.29 Provide gates at the head of driveways to minimise visual 'pull' of the driveway.	No gate has been provided. Driveway gates to common parking areas are not consistent with the LAHC Design Requirements for maintenance reasons.
4.03 Set upper storeys back behind the side or rear building line.	Upper floors have not been set back behind the side or rear building line to simplify construction, however all setbacks are consistent with the requirements of the DCP and solar access requirements are met.
5.07 Provide a sense of address for each dwelling.	Entry to dwellings is provided by the direct pathways to the common foyer area as opposed to individual street access to each dwelling. However, the elevation of the building has been articulated to mimic the rhythm of townhouse style dwellings to create a sense of individuality for each dwelling.
5.10 Avoid large uninterrupted areas of hard surface.	Driveways and paths are concrete to meet LAHC maintenance and durability requirements. The driveway and car park have been designed to minimise the extent of hard surface areas whilst still providing sufficient area for the movement of pedestrians and vehicles.

6.5.4 Good Design for Social Housing

Good Design for Social Housing establishes the 4 key goals and their underpinning principles to delivering better social housing outcomes for NSW.

Section 108C(1)(e)(i) of the Housing SEPP requires the relevant authority to consider the relevant provisions of the *Good Design for Social Housing policy* (September 2020) when assessing a proposed seniors housing development under Chapter 3, Part 5, Division 8 of the Housing SEPP.

The following assessment against the *Good Design for Social Housing* demonstrates that the proposed development has adequately considered the goals and principles outlined. Each goal is individually addressed below, and detailed responses are provided by the architect in the Housing for Seniors Checklist in **Appendix O**.

Wellbeing

The proposed development supports the wellbeing of future tenants by providing safe and accessible housing where residents have privacy and feel safe. The floor plan design allows for future adaptation to accommodate the changing needs of tenants over time, allowing them to age in place.

The development incorporates passive and active sustainable design, durable and low maintenance materials and appropriately sized units to reduce running costs. The proposal achieves a high NatHERS rating with an average of 8.2 stars. PV solar panels are positioned on the roof to maximise solar gain.

Each unit is provided with an area of private open space that accommodates a paved area for outdoor dining and attractive gardens planted with low maintenance species at ground floor level. High quality landscaping

across the site will enhance the amenity for residents, and the common seating area at the rear will encourage social interaction in a peaceful landscaped setting.

The new development provides a variety of modern finishes, and each unit incorporates an open-planned design whereby tenants are provided with the flexibility to make the space their own. Neutral colours to internal spaces will enable the tenant to affect the character of the unit with their own furniture. All of the above is done to instil a sense of pride of place for the tenant.

Belonging

The form and materiality of the proposed development have been selected to respond to the style and character of the local area, and will make a high quality contribution to the streetscape. The use of predominantly exposed brickwork and a neutral colour palette will ensure the visual appeal of the development is maintained over time.

The pedestrian entry, central foyer and communal spaces have been designed as welcoming, pleasant environments that create a sense of place for tenants and a safe transition from public to private spaces. Lighting, visual surveillance and fencing provides a sense of security within the development.

The mixed unit sizing caters to the needs of a diverse range of tenants and meets the requirements for seniors housing to cater for seniors or people with disabilities and their household members now and into the future.

Value

The development exceeds sustainability targets, with 6 of the 10 dwellings achieving a NatHERS score of 8 or above. The building materials, construction method and services have been selected to ensure that the development is durable, minimises ongoing maintenance and contributes to the low on-going running costs of the dwellings.

The scheme incorporates a modern, understated design which will date well into the future. The scheme incorporates sustainable features including insulation, high-quality glazing, clothes lines, native plantings and good solar access and cross-ventilation. Solar panels, heat pump and electric boosted solar hot water systems, and rainwater re-use will assist in minimising the use and cost of access to natural resources.

The yield is compatible with the planning provisions and the capability of the site, whilst providing a comfortable space for tenants and a positive streetscape contribution for the wider community.

Collaboration

The project involved a rigorous design process in collaboration with design professionals and engineers to ensure that the development incorporates the current best practice in affordable housing design. The development is in keeping with current government initiatives to deliver quality housing stock.

The design and assessment process involved close collaboration with a number of stakeholders, including input from a consultation process with Ryde Council and occupants of adjoining properties.

6.5.5 Land and Housing Corporation Design Requirements

The *Land and Housing Corporation Design Requirements* (LAHC Design Requirements) (February 2023) are used to inform the design and development of the LAHC social housing portfolio. These requirements apply to all new LAHC developments and are driven by tenant wellbeing, design quality, environmental performance and operational effectiveness within cost parameters.

Section 108C(1)(e)(ii) of the Housing SEPP requires the relevant authority to consider the relevant provisions of the *Land and Housing Corporation Design Requirements* when assessing a proposed seniors housing development under Chapter 3, Part 5, Division 8 of the Housing SEPP.

An assessment of the proposed development against the LAHC Design Requirements 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.

6.5.6 Housing SEPP Design Principles

The proposed activity is located in an established urban area and there are no known natural environmental considerations affecting the subject land (including known significant environmental values, resources or hazards). The existing and approved uses of land immediately adjoining the proposed development is for residential purposes.

A site analysis was undertaken as part of the design process. The impact of the bulk, scale and built form is considered to be compatible with the existing uses and the future character of the area. There are services, facilities and infrastructure that will be available to meet the demands arising from the proposed activity.

The Housing SEPP articulates a range of design principles that the LAHC must consider in determining whether or not to proceed with a proposed seniors housing activity. **Table 10** below demonstrates how the principles have been considered in the design of the proposal.

Table 10 Response to Design Principles (Part 5, Division 8)

Neighbourhood amenity and streetscape [section 99]
Seniors housing should be designed to –
(a) recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, and
N/A no residential care facility proposed.
(b) recognise the desirable elements of –
(i) the location's current character, or
(ii) for precincts undergoing a transition – the future character of the location so new buildings contribute to the quality and identity of the area, and
The existing character is predominantly single and two storey residential development of varying age and architectural style. Face brick with pitched roofs is a prominent feature of housing in the immediate area, particularly dwellings constructed during the mid to late twentieth century. Dispersed throughout the neighbourhood are more recent additions including larger, contemporary rendered dwellings with flat or pitched roofs. A number of dual occupancy developments and seniors housing developments are also evident in the locality.
The local development controls reflect the future desired character of residential development, with a 9.5m height control and density of 0.5:1. The proposed development is below the height limit permitted under the RLEP 2014 and proposes an acceptable variation to the permissible FSR as discussed in Section 6.5.1 of this REF.
The proposed development reflects the existing character of the local area through the use of face brick to all external elevations, subdued colour palette and two storey built form. The proposal is generally compatible in form, scale and character with residential development in the locality, in particular, existing seniors housing developments.
(c) complement heritage conservation areas and heritage items in the area, and
The site is not located within a heritage conservation area nor are there any heritage items that adjoin the site. There are no heritage items within close proximity to the subject site.
(d) maintain reasonable neighbourhood amenity and appropriate residential character by –
(i) providing building setbacks to reduce bulk and overshadowing, and
(ii) using building form and siting that relates to the site's land form, and
(iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and

(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and

The development has been designed to present an appropriate residential character by including landscaped front setbacks, a prominent entry point and face brick to external elevations.

The two storey building form has been sited and set back consistently with the streetscape. The siting of the building reduces visual bulk and excessive overshadowing to neighbouring sites.

Cut and fill has been minimised where possible, however given the slope of the site excavation to a maximum depth of approximately 1.6m is required to provide a level building platform and address the access requirements for seniors housing under the Housing SEPP. Retaining walls have been utilised within the site to achieve a functional and safe layout.

The two storey form is compatible in scale with adjoining and surrounding buildings in the locality.

(e) set back the front building on the site generally in line with the existing building line, and

The building line is generally set back between 7.5m – 9.5m to the main face of the building, consistent with the setbacks of dwelling houses in the locality and the DCP requirements. Balconies on the front façade are set back between 4.2m - 6.8m to provide articulation and create visual interest.

(f) include plants reasonably similar to other plants in the street, and

The proposed landscape design incorporates substantial plantings at the front and rear of the development which will enhance the streetscape and provide a pleasant landscaped space for residents to enjoy at the rear.

The scheme incorporates a mix of trees, ground covers and native shrubs, generally reflective of local plant species and suited to the local climate. Tree species proposed include *Elaeocarpus Eumundi* – Smoothy Leaved Quandong and *Elaeocarpus Reticulatus* ‘Prima Dona’ – Blueberry Ash. Smaller Bottlebrush, Grevillia and Photinia shrubs have also been selected which are evident in the existing streetscape.

(g) retain, wherever reasonable, significant trees, and

Two large established trees will be retained at the rear of the site within a communal open space area. The proposal requires the removal of 17 trees on the site to facilitate the development, however these trees are not of high retention value and many are exempt species. These trees will be adequately replaced by compensatory planting as part of the site landscaping.

(h) prevent the construction of a building in a riparian zone.

The site is not located within or adjacent to a riparian zone.

Visual and acoustic privacy [section 100]

Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and residents by –

- (a) using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and
- (b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.

The proposed development has been designed to maintain visual and acoustic privacy to adjoining properties and within the development. Design solutions include appropriate building setbacks and heights, dwelling layouts, placement and sizing of window openings and location of landscaping, particularly at the side and rear boundaries.

The building has generally been designed so that high use areas such as living rooms and private open space areas are oriented to the street or internally to minimise privacy impacts. Windows are treated with high sills or obscure glazing to maintain privacy to the neighbours. They have been offset where appropriate to avoid a direct line of sight to neighbouring properties. Privacy screens and planting are also employed to aid in providing privacy to the neighbours and tenants alike.

Bedrooms, where possible, are located away from the driveway, parking area and paths to reduce noise levels from vehicle and pedestrian movements.

Solar access and design for climate [section 101]

The design of seniors housing should –

- (a) for development involving the erection of a new building — provide residents of the building with adequate daylight in a way that does not adversely impact the amount of daylight in neighbouring buildings, and
- (b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation, solar heating and lighting by locating the windows of living and dining areas in a northerly direction.

The site benefits from a north east orientation. The development has been designed so that 9 out of the 10 (90%) units have living areas and private open space that capture this northern orientation and achieve good solar access. These units achieve at least 2 hours of solar access between 9am-3pm mid winter. Skylights have been provided to the living area and balcony of unit 10 to improve solar access to this unit. Only one unit (unit 4) does not achieve solar access to living spaces mid-winter. The building has been designed to minimise overshadowing to neighbouring properties so much as reasonably possible, ensuring neighbours continue to meet their solar access requirements. This is demonstrated in the shadow diagrams at **Appendix A**.

Dwellings are designed to maximise the use of natural light, thermal massing and ventilation. Most unit living areas face north. Windows and doors are located in the design of the units to maximise natural ventilation of the units to aid in cooling of the units. Insulation is employed to improve thermal massing of the units. Planting, screens & overhangs are employed to provide shading for the units.

Stormwater [section 102]

The design of seniors housing should aim to —

- (a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and
- (b) include, where practical, on-site stormwater detention or re-use for second quality water uses.

Stormwater catchment design, including rainwater tank and OSD have been provided to achieve council requirements.

Hard surfaces have been minimised in private garden areas, with extensive planting and mulched areas employed to minimise run off to adjoining properties. Pavement has been used where necessary on the driveway, car park and access paths.

Site stormwater will be captured and drained as shown on the submitted stormwater management plans (**Appendix C**), with 12m³ rainwater tank provided to facilitate water re-use.

Crime prevention [section 103]

Seniors housing should —

- (a) be designed in accordance with environmental design principles relating to crime prevention, and
- (b) provide personal property security for residents and visitors, and
- (c) encourage crime prevention by —
 - (i) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and
 - (ii) providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and
 - (iii) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.

The principles of *Crime Prevention Through Environmental Design* have been applied to the design to manage the safety of residents, including surveillance, territorial reinforcement, access control and space management.

The entry point to the site has been designed to allow for observation whilst not imposing on privacy. Individual units are accessed from a central foyer which encourages incidental contact amongst residents and adds to a sense of community. Individual units have been designed to be secured through the use of selected hardware. Peep-holes will also be provided on the front doors of each dwelling to enable residents to view approaches to their dwelling without having to open the door. Privacy screens to private open spaces add to a sense of personal security within units.

Fencing will be constructed along the side and rear boundaries, and all areas of private open space are fenced to create security and delineate between public and private spaces. The design of the proposed development will allow for general surveillance of the rear common space and parking area, particularly from units 4 and 10 which have living spaces and patios looking onto these areas.

Accessibility [section 104]

Seniors housing should –

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

The Access Report (**Appendix H**) demonstrates that obvious and safe pedestrian links are available from the site to transport services and local facilities on Balaclava Road located to the east of the site. The proposal demonstrates compliance with Clause 93 of the Housing SEPP as site is within 400m walking distance of public transport along Balaclava Road. The gradient of the footpath between the site and the bus stops on Balaclava Road has been surveyed. As demonstrated in **Appendix D**, the footpath gradient required for seniors housing under Section 93(4)(c) is not exceeded and therefore, no upgrades to the footpath are required.

Driveways and parking areas within the site are clearly defined and are to be well lit for safety, with landscaping appropriate to create a pleasing environment. Car parking is provided for residents within the site, including 2 accessible parking spaces. Accessible pathways are provided between the car parking area and each unit. There is ample street parking available on Raymond Street for visitors.

Waste management [section 105]

Seniors housing should include waste facilities that maximise recycling by the provision of appropriate facilities.

A waste storage area is provided at the western side of the development (behind the building line) and will accommodate both general waste and recycling waste. The storage area has been appropriately screened to minimise visual impact but still retain good visibility to avoid the creation of entrapment spaces. The site will be serviced by council's standard kerb-side pickup service, with bins moved from the storage area to be collected through Council's runner service.

Ongoing green waste from communal landscaping areas will be removed by a nominated maintenance contractor. General green waste from private open space areas will be removed via green waste bins provided.

6.6 Other State Environmental Planning Policies

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

Table 11 Compliance with other applicable State Environmental Planning Policies

SEPP (Building Sustainability Index: BASIX) 2004

A BASIX Certificate has been obtained for the development proposal, as required under the SEPP (refer to **Appendix K**).

SEPP (Transport and Infrastructure) 2021

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.

The site is not located in close proximity to a State Classified Road, adjacent/near a rail corridor or electricity infrastructure and as such, the provisions of the SEPP do not apply.

SEPP (Biodiversity and Conservation) 2021

This Biodiversity and Conservation SEPP provides planning controls related to conservation and management, to ensure protection of the natural environment.

Clause 2.6(1) of this SEPP requires a permit from Council for clearing of vegetation required under the policy. The proposal includes removal of 17 trees, however these have been assessed by an arborist and deemed to be of low retention value (refer to **Appendix J**).

Notwithstanding, Section 6 of the Housing SEPP specifies that development permitted without consent may be carried out without another consent or a licence, permission, approval or authorisation otherwise required under another environmental planning instrument. This means the proposed removal of trees within the site can be included within the REF scope and does not require a permit from Council.

The site is located within a regulated catchment, namely, the Sydney Harbour 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 of an activity proposed to be carried out in a regulated catchment, must consider *State Environmental Planning Policy (Biodiversity and Conservation) 2021*, sections 6.6(1), 6.7(1), 6.8(1) and 6.9(1), and

Further, as the consent authority LAHC must be satisfied under *State Environmental Planning Policy (Biodiversity and Conservation) 2021*, sections 6.6(2), 6.7(2), 6.8(2) and 6.9(2).

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;
- 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.

The consent authority is also required to assess the impact of the development

- 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.

Further this clause also requires that consent is not issued unless the consent authority is satisfied the development ensures:

- 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.

Comment: Stormwater will be collected within the site and conveyed to an on site detention tank located beneath the driveway. Stormwater flows will be conveyed from the OSD tank to the existing stormwater pit on Raymond Street. 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). Identified Requirements (Nos 6 and 42) are applied to the activity determination recommending that stormwater management of the activity is designed in accordance with Ryde Council's technical guidelines and policies.

6.7 Aquatic ecology

This clause requires the consent authority to consider whether the development:

- 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 Water Management Act 2000, or a permit under the Fisheries Management Act 1994,

- 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,
- 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.

Further this clause also requires that consent is not issued unless the consent authority is satisfied the development ensures:

- 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 *Water Management Act 2000* or a permit under the *Fisheries Management Act 1994* 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.

Comment: 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. 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.

6.8 Flooding

This clause relates to flood liable land.

Comment: The site is not located on flood liable land.

6.9 Recreation and public access

This clause relates to development on recreational land and public access to natural water bodies and foreshores.

Comment: The proposed activity will not impact recreational land uses or alter public access to recreational land or foreshores.

SEPP (Resilience and Hazards) 2021

The Resilience and Hazard SEPP provides provisions for development in the coastal zone, management of hazardous and offensive development and remediation of contaminated land.

Section 4.6 of this SEPP requires the consent authority to consider whether land is contaminated prior to granting development consent.

The site is located within an established residential area of Ryde LGA. There are no known historic activities which would indicate contamination. The s10.7 planning certificates (**Appendix F**) do not identify the site as being potentially contaminated. Notwithstanding, the draft *Contaminated Land Planning Guidelines* (draft Guidelines) prepared by the Department of Planning, Housing and Infrastructure and the Environmental 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 the table below:

Previous evidence of contamination	Yes/ No	Response

a) Was the subject land at any time zoned for industrial, agricultural or defence purposes?	No	LAHC records indicate that the land has been used for residential purposes since the early 1950's.
(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	Each lot contains a single storey detached dwelling and associated structures.
(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	A site inspection has been undertaken did not reveal any evidence of potential contaminating activities.
(g) Are there any contamination impacts on immediately adjacent land which could affect the subject land?	No	Adjoining development is residential, forming part of a larger residential subdivision carried out in the early 1950's.
(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 demolition / construction works.
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.

A recommended Identified Requirement (No. 17) requires implementation of management measures in the unlikely event of contamination prior or during construction works.

6.7 Ryde Local Environmental Plan 2014 (RLEP 2014)

Compliance with the relevant provisions / development standards set out in the RLEP 2014 is demonstrated in **Table 12** below.

Table 12 Ryde Local Environmental Plan 2014

Relevant Provisions / Development Standards for Seniors Housing			
Clause	Provision / Development Standard	Required	Provided
4.3	Height of Buildings	(2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map (9.5 metres)	Maximum building height (measured in accordance with the LEP definition) is 8.75 metres.
4.4	Floor Space Ratio	(2) The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map (0.5:1).	Proposed FSR is 0.54:1. Refer to Section 6.5.1 of this document for discussion around floor space ratio.

6.8 Ryde Development Control Plan 2014

Ryde Development Control Plan 2014 (RDCP 2014) does not contain specific development controls for seniors housing. As such, the building setbacks for multi-unit housing have been used for comparative purposes to demonstrate the suitability of the site for the proposed scale of the development as shown in **Table 13** below.

The general controls for all development set out in RDCP 2014 have generally been addressed in the various sections of this REF that address compliance with the provisions of the Housing SEPP.

Table 13 Ryde Development Control Plan 2014

Compliance with setback controls for multi-dwelling housing		
Multi-dwelling housing		
Clause	Requirement	Proposed
3.5 Setbacks		
3.5.1 Front setbacks	a. Buildings must be setback: <ul style="list-style-type: none"> i. The same distance as one of the buildings on an adjoining allotment, if the difference between the setbacks of the building on the two adjoining allotments is not more than 2 m; or ii. If the difference between the setbacks of the adjoining buildings is more than 2 m the development must be setback the average of the front setback of the two adjoining developments. 	Given the nature of Raymond Street, the site has a curved frontage. The existing buildings on adjoining properties to the east and west are setback approximately 7.5m and 9.2m from their front boundary, respectively. The streetscape is undergoing a transition as more contemporary developments are constructed.

Compliance with setback controls for multi-dwelling housing

	<p>b. Council may approve a setback of 1 m less than the above standard for not more than 50% of the front elevation of the building in order to provide an irregular front elevation and to add interest to the streetscape provided that this variation does not adversely affect any adjoining property.</p> <p>c. Council may vary this standard if it is satisfied that the existing streetscape is likely to change. In this situation the setback must be not less than 7.5 m for 50% of the frontage and not less than 6.5 m for 50% of the frontage.</p>	<p>The proposal responds to the curvature of the front boundary and the changing streetscape by incorporating a stepped design. The main face of the proposed building is set back between 7.5m – 9.5m, generally consistent with the setbacks of adjoining buildings. Balconies on the front façade are setback between 4.2m - 6.8m to provide articulation and add interest to the streetscape. Balconies represent less than 50% of the front elevation. The placement of proposed balconies along the front façade will not adversely affect any adjoining property.</p>
3.5.4 Side and Rear Setbacks	<p>a. The walls of all buildings must be not less than 4.5 m from side and rear boundaries. Where vehicular access is provided within this area, the minimum setback shall be 6 metres.</p> <p>b. The rear and side setbacks must be adequate to achieve an appropriate level of solar access within all proposed courtyards (see Section 3.9 Overshadowing and Access to sunlight).</p> <p>c. The development must be designed in such a way as to ensure existing substantial trees are not located within proposed courtyard areas (Section 3.6 Private Outdoor Space).</p> <p>d. To promote variation and interest in design Council may allow up to 50% of the wall of any Multi dwelling housing dwelling to be not less than 3 metres from the side and rear boundary.</p>	<p>The site setback on the western side is a minimum of 4.5m with the bulk of the building setback 6.5m. The minimum side setback on the eastern side is 3.04m for approximately 50% of the wall length, consistent with Item d. below. The remainder of the eastern façade is setback 5.15m. The rear setback is 13.02m.</p> <p>The development achieves adequate solar access to proposed private open spaces as per the provisions of the Housing SEPP.</p> <p>No existing substantial trees are located within proposed courtyard areas.</p> <p>Noted. Refer to comment above.</p>
4.8 Location of Bin Enclosures	<p>a. Waste and recycling storage areas and facilities are to be provided and designed for all developments in accordance with the requirements of Part 7.2 Waste Minimisation and Management in this DCP.</p> <p>c. For developments of 6 or more dwellings or where sites are steeply sloping or have a narrow road frontage:</p> <p>i. A central garbage bin enclosure shall be provided.</p>	<p>The waste and recycling storage area and facilities are generally provided in accordance with the provisions outlined in section 7.2 of the DCP.</p> <p>The development contains more than 6 dwellings. Given the slope of the site, a central bin area is provided on the western side of the development and is located behind the building line. The enclosure is suitably concealed through the design of the</p>

Compliance with setback controls for multi-dwelling housing

ii. The garbage bin enclosure is to be located behind the building line and suitably screened by landscaping. A plan indicating the design and location of the garbage bin enclosure must be submitted with the development application. (See Schedule 3 for details on the construction of Garbage Enclosures)

development. A Waste Management Plan is provided in Appendix R.

7 Notification, Consultation and Consideration of Responses

Copies of the notification letters sent to the local council and to the adjoining occupiers are provided in **Appendix G**, together with a copy of the response received from council.

7.1 Council Notification

In accordance with section 108C of the Housing SEPP, Ryde Council was notified of the development by letter dated 23 November 2023 (refer to **Appendix G**). The notification response period formally closed on 20 December 2023 and Council responded to the notification by letter dated 12 January 2024, which has been extracted in **Table 14** 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. In the letter, Council also recommended conditions of consent to maintain compliance with various approvals and legislation. Full comments provided in response to Council's recommended conditions are contained in **Appendix G**.

Table 14 Issues raised in Council submission

Issues raised	Response
Site related requirements <ul style="list-style-type: none"> Insufficient information submitted to determine whether the proposal complies with Section 93 of the Housing SEPP, relating to accessibility of the site to services and facilities. The Access Report does not address this requirement. 	It is noted that compliance with Section 93 of the Housing SEPP is not a statutory requirement for seniors housing carried out without consent by LAHC. Notwithstanding this, adequate access to facilities and services is addressed in Section 6.5.6 of the REF in relation to accessibility requirements of Section 104 of the SEPP, and generally complies with Section 93 of the SEPP.
Non-discretionary development standards <ul style="list-style-type: none"> Clause 4.6 required to be submitted for any non-compliances (in this regard, FSR) to non-discretionary development standards under the Housing SEPP. 	A Clause 4.6 variation for the FSR non-compliance is not a statutory requirement for seniors housing carried out without consent by LAHC under the provisions of Part 5 of the EP&A Act. Notwithstanding this, the FSR exceedance has been considered and addressed in Section 6.5.1 of the REF.
Seniors Living Policy: Urban Design Guidelines for Infill Development <ul style="list-style-type: none"> No detailed assessment of the activity against the Seniors Living Policy provided. The zoning of the site being R2 – Low Density Residential and the applicable built form controls, do not provide for, or encourage apartment or townhouse style buildings in the locality. The appearance of the development is found not to be consistent with the character of the area. If seniors housing development is deemed compatible, future development should present as a detached nature and articulated 	<p>A detailed assessment of the proposal against the <i>Seniors Living Policy for Infill Development</i> has been provided and addressed in Section 6.5.3 of the REF.</p> <p>The proposed seniors housing development is designed in accordance with the requirements under Chapter 3, Part 5, Division 8 of the Housing SEPP and is considered consistent with the built form of the surrounding development in the locality, especially other seniors housing developments and more contemporary dwellings. The 2-storey design, siting, layout and landscape setting of the proposed development aligns with that of emerging development in the locality. This is further addressed in Section 8.1 of the REF.</p>

Issues raised	Response
<p>form to be reflective of adjoining R2 Low Density Zone.</p>	
<p>On-street Waste Collection</p> <ul style="list-style-type: none"> Given that the waste collection arrangement is in the form of kerbside waste collection, it is recommended that on-street parking at the site's street frontage be restricted to "no parking 5am – 11am Thursdays, waste vehicles excepted" to ensure that adequate on-street space is provided for being used by waste trucks on the day of waste collection. <p>Waste</p> <ul style="list-style-type: none"> The plans do not currently demonstrate bulky waste storage. A separate room or undercover caged area of a minimum 5m² must be provided for the storage of bulky discarded items. 	<p>Noted. An Identified requirement No. 82 to this effect is recommended to ensure compliance.</p> <p>Additional bulky waste storage is generally not provided to proposed seniors housing development as it poses security concerns and ongoing maintenance issues for LAHC developments. LAHC's general maintenance contractor will be responsible for removing bulky waste items, if required.</p> <p>Additionally, Section 7.2 <i>Waste Minimisation and Management</i> of RDCP 2014 requires a separate room or undercover caged area of a minimum 5m² for the storage of bulky discarded items for developments comprising 30 or more dwellings. The proposed development is for 10 dwellings only and therefore this requirement is not considered applicable.</p>
<p>Landscaping and trees</p> <ul style="list-style-type: none"> Given the proposed removal of trees, the application should align with the Urban Forest Strategy April 2023. Additional planting of street trees should be provided, with a minimum of 4 trees. Due to the removal of existing trees, 3 x larger canopy trees (mature size larger than 10m) is required to be planted as the new trees identified in the Landscape Plan. 	<p>Noted. An amended Landscape Plan has been prepared to provide additional planting of 4 x street trees and incorporates 3 x larger canopy trees within the site, capable of reaching a mature height of 10m (Appendix B).</p>

Issues raised	Response
<p>Stormwater and Engineering</p> <ul style="list-style-type: none"> The proposed stormwater strategy is inconsistent with Council's stormwater policy. The proposed onsite detention system design parameters have not been correctly implemented, noting the design has simply applied the rates to the net site area. The proposal must refer to Council's DCP Part 8.2 (Stormwater and Floodplain Management) and associated Technical Manual for calculation method 	<p>Noted. Amended Stormwater Concept Plans (Appendix C) have been prepared to address the matters raised by Council. Further consultation with Council confirmed the proposed design is now in accordance with Council's stormwater policy.</p>

Additional Identified Requirements are recommended in the **Activity Determination** to address the following conditions provided by Council:

- **Construction Traffic Management Plan** (Identified Requirement No. 79)

A Construction Traffic Management Plan (CTMP) for all construction works, including demolition activities, shall be prepared by a suitably qualified traffic engineer and submitted to the NSW Land and Housing Corporation by the building contractor prior to the commencement of demolition/construction works. The CTMP shall include any Traffic Control Plans and/or Traffic Guidance Schemes.

All construction works are to be undertaken in accordance with the CTMP. All controls in the CTMP must be maintained at all times and all traffic management controls must be undertaken by personnel having appropriate SafeWork NSW accreditation. A copy of the CTMP is to be kept onsite at all times and made available to the certifier, NSW Land and Housing Corporation or Council on request.

- **Oversize Overmass Approval** (Identified Requirement No. 80)

An Oversize Overmass approval from the National Heavy Vehicle Regulator (NHVR) must be obtained if necessary and submitted to the NSW Land and Housing Corporation. If required, the Oversize Overmass Permit shall be obtained through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal) prior to driving through local roads within the City of Ryde LGA.

- **Works within Public Domain** (Identified Requirement No. 81)

All proposed works within the public road and public domain shall be designed and constructed to Council's standards and specifications and a copy of the details / plans submitted to Council prior to work commencing. The building contractor shall arrange for necessary inspections by Council whilst the work is in progress or after completion of the works.

- **Signage and Linemarking Plan** (Identified Requirement No. 82)

Prior to occupation, a signage and linemarking plan shall be prepared by a suitably qualified traffic engineer, restricting on-street parking at the site's frontage to "No Parking 5:00am-11:00am Thursdays, Waste Vehicles Excepted" to ensure adequate space is provided for waste trucks on the day of waste collection. The plan shall be prepared in consultation with Council and provided to the NSW Land and Housing Corporation.

The installation of the signage and linemarking in accordance with the plan is to be carried out prior to occupation of the development. All costs associated with the supply and construction of the signage and linemarking are to be borne by the building contractor (at no cost to Council).

- **Final Asset Register** (Identified Requirement No. 83)

A Final Asset Register shall be provided to City of Ryde Council prior to occupation, if necessary. The listing shall detail any infrastructure assets constructed on Council land as part of the development works and may include but are not limited to new road pavements, new Multi-Function Poles (MFPs), new concrete or granite footways, new street trees and tree pits, street furniture, bus shelters, kerb and gutter and driveways.

- **Dilapidation Report** (Identified Requirement No. 84)

Prior to the commencement of works and on completion of construction, detailed dilapidation reports are to be prepared to include existing public infrastructure in the vicinity of the proposed development. The report shall detail, but not be limited to, the location, description and photographic record (in colour) of any observable defects to the following infrastructure where applicable.

- a) Road pavement,
- b) Kerb and gutter,
- c) Footpath,
- d) Drainage pits,
- e) Traffic signs, and
- f) Any other relevant infrastructure.

A copy of the report is to be provided to the NSW Land and Housing Corporation and City of Ryde Council.

- **Temporary Footpath Crossing** (Identified Requirement No. 85)

A temporary footpath crossing, if required, shall be provided at the vehicular access points. It is to be 4 metres wide, made out of sections of hardwood with chamfered ends and strapped with hoop iron, and a temporary gutter crossing must be provided.

- **Separate Receptacles** (Identified Requirement No. 86)

Two separate receptacles must be provided inside each dwelling to store up to two days' worth of waste and recyclables awaiting transfer to the communal bin disposal areas to ensure source separation of recyclables.

- **Garbage Storage Details** (Identified Requirement No. 87)

External areas for the storage of garbage must be paved with concrete graded to a floor waste connected to the sewerage system and be roofed to exclude rainwater. The floor waste must be provided with a fixed screen in accordance with the requirements of Sydney Water Corporation and a hose with a trigger nozzle must be provided adjacent to the garbage storage area to facilitate cleaning.

- **Bin Signage** (Identified Requirement No. 88)

Signs shall be placed within the bin area (waste room) to encourage correct recycling and reduce contamination. Signage will be provided by City of Ryde Council.

7.2 Notification of Occupiers of Adjoining Land and Other Persons

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

Advice was sought from Council regarding additional persons or property that should be notified of the development via an email dated 24 April 2023. Council provided an email response on 27 April 2023 advising that the notification map is consistent with Council's Community Participation Plan and acceptable to Council. **Figure 17** illustrates the properties in which the occupiers were notified of the development.



Figure 17 Map of Properties Notified of the Proposed Development (Source: LAHC)

Under section 108C(1)(b) of Housing SEPP, occupiers of adjoining land, as identified in the above map, were notified of the proposed development activity by letter dated 23 November 2023. A copy of the notification letter is provided at **Appendix G**.

The notification response period formally closed on 20 December 2023 and 1 submission in the form of a phone call was received. The submission is discussed in **Table 15**.

Table 15 Issues raised by adjoining owners / neighbours

Issues raised	LAHC Response
<i>2 storey development - concerns regarding suitable accessibility provided to first floor units</i>	Consideration of development standards for accessibility under Section 85 and Schedule 4 of the Housing SEPP have been addressed in Section 6.5.2 of the REF. In this regard, the development incorporates provision for a lift to provide accessibility to first floor units, all of which meet the relevant standards for Seniors Living dwellings.

7.3 Notification of Specified Public Authorities

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

8 Review of Environmental Factors

Environmental factors associated with the proposed activity in terms of location, character, bulk and density, privacy, solar access and overshadowing have been considered in accordance with the provisions of the Housing SEPP and discussed in Section 6.5.6 of this REF. A review of other environmental factors associated with the proposed activity, and the measures required to mitigate any adverse impacts to the environment, are provided below.

8.1 Neighbourhood Character

The site is located within an established residential area generally supporting single and 2-storey detached dwelling houses. Within the local area there are also several examples of more modern style dual occupancies and double storey multi dwelling and seniors housing developments including construction materials of rendered brick, face brick, weatherboard cladding and colorbond steel roofing. Although the neighbourhood is zoned for low density, the age of the housing stock and large lot sizes lends itself to urban renewal which includes more diverse housing typologies including dual occupancies, multi-dwelling style development such as affordable housing and housing for seniors, which is observed within the surrounding locale.

The bulk and scale of the proposed development will be compatible with the existing character of the neighbourhood and will deliver a built form outcome generally consistent with the planning controls for the locality. The 2-storey design, siting, layout and landscape setting of the proposed development aligns with that of emerging development in the locality.

Mitigation Measures

No mitigation measures are required, as the design of the proposed development is sympathetic to the neighbourhood character, providing setbacks to neighbouring development that are consistent with surrounding dwelling houses. Suitable design treatments, including fencing, landscaping and a considered planting mix ensure the proposal will generate benefits to neighbourhood character.

8.2 Bulk and Density

The proposed development is consistent with the bulk and scale of surrounding development in the locality of Eastwood. 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. The development incorporates a stepped building form, deep soil zones and private courtyards within the front setback to provide visual interest and minimise bulk and scale.

The proposal incorporates a floor space ratio of 0.54:1 and a maximum height of 8.75m which is generally consistent with a low-density residential area. Although the FSR is above the intended 0.5:1 FSR of the RLEP 2014, the additional floor space does not create any unacceptable impacts on adjoining properties or the streetscape. The FSR and 2-storey built form is sympathetic to the surrounding context and is an appropriate response to the desired future character envisaged for the R2 Low Density zone.

The reasonable floor space ratio in conjunction with generous setbacks and landscaped deep soil areas confirms the proposal does not constitute an overdevelopment of the site. The proposal will suitably increase housing density which is consistent with State and regional strategies and the development controls applying to the site. As such, no mitigation measures are required.

Mitigation Measures

No mitigation measures are required.

8.3 Streetscape

The architectural style of the proposed development is compatible with the form of contemporary residential development emerging in the surrounding locality. The two-storey building form is broken up by a number of building recesses and landscape zones. Prominent ground and first floor private open spaces provide surveillance to the streetscape, which is a common feature of more recent developments in the surrounding locale. The hard standing parking area has been located at the rear of the site, generally obscured from street view.

The strong articulation and modulation along the front façade and improved landscaping proposed within the street setback areas will make a positive contribution to the streetscape of Raymond Street. The proposed development will replace ageing housing stock that is nearing the end of its economic life with a new contemporary residential development.

The built form has been designed to address the Raymond Street frontage 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 mitigation measures are required.

8.4 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 dwellings that respond to the site context and neighbourhood character. Articulation, diverse mix of materials and a neutral colour palette will assist with the overall aesthetic of the site.

The landscaping proposed within the Raymond Street front setback includes planting of 3 native trees capable of reaching a height of 10m at maturity. At maturity, these trees will partially screen the first floor from the street, offering additional privacy to first floor units 7 and 9. Extensive low level planting is also proposed which will provide visual amenity and help soften proposed retaining structures, including access ramps. Furthermore, 4 new street trees with a mature height of 10m are proposed along Raymond Street, which will provide additional canopy and shade to pedestrians and improve the aesthetic quality of the streetscape.

Considered tree and shrub planting along the side and rear boundaries of the site will add to the long-term visual amenity of the surrounding properties and improve the appearance of the site from the street. As such, no mitigation measures are required.

Mitigation Measures

No mitigation measures are required.

8.5 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 site landscaping, new 1.2-1.8m high fencing, adequate site setbacks and strategic placement of windows so as to avoid direct overlooking of neighbours.

Courtyards and balconies associated with Units 1, 2, 3, 7, 8 and 9 are orientated toward Raymond Street with landscaping, including trees and shrubs, proposed within the front setback to improve streetscape amenity and privacy for future residents. Courtyards/balconies proposed along the western elevation include privacy screening to ensure that overlooking is mitigated to adjacent development at No. 24 Raymond Street. The private open space proposed along the eastern elevation belonging to Units 3 and 4 also consists of lower finished floor levels than the adjoining development and is further screened by a 1.8m fencing to ensure visual privacy is maintained.

Furthermore, the balcony for Unit 10 is orientated towards the rear area of the site and as such will not directly overlook the windows or private open space of the adjacent southern sites due to the screening provided by existing trees and appropriate building setback.

Mitigation Measures

No mitigation measures are required.

8.6 Solar Access

The design and siting of the proposed development will provide adequate daylight access to the proposed dwellings living areas, private open spaces and the private open space areas of neighbouring properties in accordance with the Seniors Living Policy: Urban Design Guidelines for Infill Development. The submitted Architectural Plans (**Appendix A**) indicate that 9 out of 10 dwellings (90%) receive at least 2 hours direct solar access to the living and POS areas on June 21, which meets the requirement for 70% of dwellings to achieve 2 hours of direct solar access to the living and POS areas on June 21.

Shadow diagrams also confirm the proposed development will enable adjoining sites to maintain reasonable solar access to living areas and private open spaces mid-winter.

Proposed living and open space areas have been carefully sited to maximise solar access and the proposal is consistent with the Housing SEPP requirements.

Mitigation Measures

No mitigation measures are required.

8.7 Overshadowing

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

At 9am, shadows generated by the proposed development are generally contained within the site to the driveway and parking area, with some minor impact to the eastern elevation of 24 Raymond Street. At 12noon, shadows are contained within the subject site to the car park and landscaped area to the rear. At 3pm, shadows are cast to the south-east within the site and the western façade of 18 Raymond Street. While there are some minor impacts to the directly adjoining sites (24 and 18 Raymond Street), the adjoining properties

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 mitigation measures are required.

8.8 Traffic & Parking

The development proposes 5 surface car parking spaces at the rear of the site, including 2 accessible spaces, to serve the needs of residents. The provision of on-site car parking exceeds the parking requirements set out in the Housing SEPP for developments carried out by LAHC by 2 spaces. Unrestricted street parking is available on Raymond Street to accommodate any overflow parking demand generated by the proposed development.

The Traffic Impact Assessment (**Appendix S**) indicates that the development will have a projected nett increase of 5 vehicle trips per hour during the AM and PM peak hour periods. The projected nett change in traffic activity as a consequence of the development proposal is negligible and will not have any unacceptable implications in terms of road network capacity.

The Traffic Impact Assessment examined the adequacy of the proposed internal driveway and parking arrangement. The assessment of the car park layout, including the proposed parking spaces and associated aisle width, indicate the car park layout is compliant with the relevant applicable Standards (AS2890.1-2004). The assessment (including swept path analysis) confirms that the design is suitable based on an assessment of the project vehicle movements. The proposed driveway width is suitable to accommodate one way vehicle movements, however also includes the provision of a passing bay at the site entry to minimise the need for vehicles to reverse onto Raymond Street.

Mitigation Measures

No mitigation measures are required.

8.9 Flora and Fauna

An Arboricultural Impact Assessment has been prepared for the site by Advanced Treescape Consulting (**Appendix J**). The report considers 19 trees within the subject site. Of the 19 trees, 2 trees are identified as medium landscape significance (T2 – *lophostemon confertus* (bottle brush), with a height of 17m and T3 – *angophora costata* (Sydney red gum), with a height of 12m). These trees are located at the rear of the site and will be retained and protected as part of the development. The extent of proposed TPZ encroachment has been addressed in detail in the Arboricultural Impact Assessment (**Appendix J**) and was found supportable, subject to appropriate tree protection zones and tree sensitive construction techniques.

The report recommends the removal of 17 trees which are located within the proposed development footprint or that would be impacted by an unavoidable major encroachment within their tree protection zones.

All 17 trees which require removal have been identified as low landscaping significance, either due to their species or poor health or condition. To offset the loss of existing trees, appropriate replacement planting comprising of 3 tree is proposed, as indicated on the landscape plan and details. The compensatory tree planting will be located within the front setback and will consist of 2 x *Elaeocarpus eumundii* – smooth leaved quandong and 1 x *Elaeocarpus reticulatus* ‘Primar donna’ – blue berry ash, both with mature heights of 10m.

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.

The development will also result in the loss of 1 small street tree on Raymond Street which is proposed to be replaced with 4 street trees – *tristania laurina* ‘Luscious’ also known as water gum as requested by City of Ryde Council.

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 recommendations contained within the Arboricultural Impact Assessment (**Appendix J**) and as required by Identified Requirement No. 36. Tree Protection Zone fencing is required to be erected for all 2 trees proposed to be retained prior to the commencement of works (Identified Requirement No. 36).

8.10 Heritage (European / Indigenous)

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

Aboriginal Heritage

An Aboriginal Heritage Information Management System (AHIMS) search, dated 30 October 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 Ryde 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

Standard identified requirements (No. 46 and 47) have been applied should any cultural heritage relics be discovered on the site during excavation / construction.

8.11 Soils / Contamination / Acid Sulfate Soils / Salinity

Geotechnical

A Geotechnical Site Investigation, prepared by SMEC indicates the following:

- The subsurface conditions generally consist of topsoil/fill overlying silty clays and weathered sandstone. The topsoil is present to depths of 0.2 to 0.25m. In borehole 4, hand auger refusal occurred at a depth of 0.55m. In the remaining boreholes, firm to stiff becoming very stiff natural silty clays were present in depths of 1.7-3m. In boreholes 2 and 3, soils were underlain by weathered sandstone to depth of auger refusal 2.1 and 2.35m.
- Groundwater was not observed during drilling works.

Contamination

According to Council's Section 10.7(2) & (5) Planning Certificates, the land is not affected by a policy restriction relating to contaminated land.

Notwithstanding, 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 were considered in section 6.6 of this report and conclude that it is unlikely that the land is contaminated.

Acid Sulfate Soils

According to Council's Section 10.7(2) & (5) Planning Certificates, the land is not identified as containing acid sulfate soils.

Salinity

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

Mitigation Measures

An identified requirement (No. 13) recommends that sediment control measures be implemented during demolition/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).

Standard Identified Requirement (No. 1) is recommended to require compliance with the recommendations of the Site Investigation Report prepared by SMEC Testing Services Pty Ltd.

A standard identified requirement (No. 17) has been recommended to cover the possibility of discovering site contamination during demolition / construction works.

8.12 Drainage / Flood Prone Land / Hydrology/ Water Quality

Stormwater drainage for the proposed development has been designed in accordance with Council's requirements and was amended following receipt of Council's comments during statutory notification. Stormwater will be collected via a series of stormwater pits on the site connected to an underground detention tank located under the driveway near the Raymond Street frontage. From the OSD tank, stormwater will be conveyed through the road reserve to an existing kerb inlet pit on the southern side of Raymond Street. Roof water from the subject development will be collected from downpipes and connected to an underground rainwater tank for recycling with overflow connected to the underground detention tank.

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 & 35) have been recommended to ensure that stormwater drainage is managed in accordance with legislative requirements.

8.13 Bushfire Prone Land

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

Mitigation Measures

No mitigation measures are required.

8.14 Noise and Vibration

During Demolition / Construction

During demolition/construction typical noise levels associated with demolition/ building works will be generated within the hours consistent with the requirements for Complying Development throughout NSW.

During Occupation

Noise generated when the proposed buildings are completed and occupied will be entirely in keeping with their residential surroundings. No major plant or equipment, which would generate unacceptable noise during occupation, will be installed in the proposed development.

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

Mitigation Measures

Demolition/construction noise will be controlled to within acceptable limits by sound attenuation measures and undertaking construction activities within EPA/local council requirements.

Buildings will be constructed to comply with the deemed-to-comply provisions of the *Building Code of Australia* and EPA criteria with respect to noise transmission.

Appropriate standard identified requirements (Nos. 2, 58 and 60) have been applied to ensure compliance with the above mitigation measures.

8.15 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 (Nos. 64 & 65) have been applied that will satisfactorily mitigate any potential or adverse impacts on air quality.

8.16 Waste Minimisation

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

During Demolition

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

- concrete and bricks will be transported to an approved recycling facility;
- any asbestos sheeting and fibrous insulation will be handled according to SafeWork NSW requirements and disposed of to an approved building waste collection facility;
- mixed demolition materials will be transported to an approved building waste collection facility; and
- timber, metal, wall and roof cladding and other salvageable materials will be recycled where appropriate or disposed of at an approved building waste collection facility.

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

During Construction

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

- surplus bricks, tiles and metal to be returned to supplier or transported to building recycling facility;
- concrete shall be transported to building recycling facility;
- timber shall be reused in concrete formwork where possible or sent to recycling facility; and
- surplus plasterboard shall be returned to supplier or sent to building recycling facility.

During Occupation

General and non-recyclable waste will be disposed of in Council's standard waste storage bins located in the garbage storage enclosure. RDCP 2014 notes that Council does not provide a drive-in onsite collection service however, provides a runner service to take bins from bin storage areas to the kerbside for collection by a collection vehicle where the bin storage area is no more than 15m from the kerbside. Therefore, it is considered that utilisation of Council's runner service is an appropriate method of collection and can be further explored through consultation with Council and incorporated into the final Waste Management Plan during the construction documentation stage.

Paper / metal / glass will be disposed of in Council's standard waste recycling bins to be located in the garbage storage enclosure and will be collected as per above, through Council's waste service.

Mitigation Measures

Standard Identified Requirements (Nos. 49-54) are recommended to ensure construction/demolition waste is appropriately managed and disposed of.

A standard Identified Requirement (No. 37) is recommended to require the preparation of a final waste management plan for the demolition, construction and occupation phases of the development. City of Ryde Council also requested the inclusion of Identified Requirements in relation to waste storage within the dwellings, arrangements for the commencement of waste collection, design of the waste room and signage within the waste room. These have been included as Identified Requirements No. 86-88.

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

Mitigation Measures

No additional mitigation measures are required.

8.18 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 seniors housing in the Ryde 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 seniors 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.

8.19 Economic Impact

The proposed development is likely to contribute to a range of economic benefits in the Ryde 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 tradespeople 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.

8.20 Cumulative Impact Assessment

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

- The proposed activity will not result in any adverse cumulative impact when considered in conjunction with any other proposals or developments in the area;
- there will be no synergistic effects of individual project impacts from the proposed activity when considered in combination; and
- there are no known environmental stresses in the area of the proposed activity that would be increased.

Mitigation Measures

No mitigation measures are required.

9 Conclusion

9.1 Summary of Key Issues Raised in Assessment

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

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

As demonstrated in this REF, the proposed activity is consistent with the relevant objectives and standards set out in the Housing SEPP, RLEP 2014, 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 1 and 2 bedroom seniors housing dwellings in the local area. Therefore, the proposed development is clearly in the public interest.

9.2 Recommendation

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

10 Appendices

APPENDIX A – ARCHITECTURAL PLANS

APPENDIX B – LANDSCAPE PLAN

APPENDIX C – CIVIL PLANS

APPENDIX D – SURVEY PLANS

APPENDIX E – NOTIFICATION PLANS

APPENDIX F – SECTION 10.7 PLANNING CERTIFICATES

APPENDIX G – NOTIFICATION LETTERS, PUBLIC AUTHORITY
SUBMISSIONS AND RESPONSES

APPENDIX H – ACCESS REPORT

APPENDIX I – AHIMS SEARCH

APPENDIX J – ARBORIST REPORT

APPENDIX K – BASIX CERTIFICATE

APPENDIX L – BCA REPORT

APPENDIX M – DESIGN COMPLIANCE CERTIFICATES

APPENDIX N – NatHERS CERTIFICATE

APPENDIX O – HOUSING FOR SENIORS CHECKLIST

APPENDIX P – GEOTECHNICAL INVESTIGATIONS

APPENDIX Q – TITLE SEARCH AND DP

APPENDIX R – WASTE MANAGEMENT PLAN

APPENDIX S – TRAFFIC REPORT