

File Ref: PRE2023/0043

12 September 2023

Community Engagement  
NSW Land and Housing Corporation

CommunityEngagement@fac.s.nsw.gov.au

Dear Carmen,

**Property:** 7-9 Brighton Road, Peakhurst and 21 Charles Street, Riverwood  
**Proposal:** Demolition of 3 existing dwellings and associated structures, and the construction of a 14 dwelling seniors housing development containing 6 x 1-bedroom and 8 x 2-bedroom independent living units, associated landscaping and fencing, parking for 7 cars, and consolidation into a single lot.

Thank you for the opportunity to provide feedback on the proposal at the above address. The below advice is provided for your consideration in the detailed design of the development.

### **Planning and Urban Design**

The proposal involves construction of 14 dwellings over two storeys with a single circulation core. The subject site is located within the R2- Low Density Residential zone and Seniors Living is permitted with Consent. However, given the scale of development, setbacks prescribed for medium density development have been applied to the development. However, none of the ground floor units have direct access from the street as required for medium density developments as well as residential flat buildings. The proposed building is an interpretation of a residential flat building typology rather than any building types permitted in the low density residential zone.

Following urban design comments rely on SEPP Housing, GRDCP and sound urban design principles in making recommendations.

### **1.0 Topography**

The site generally slopes down from the southwest corner to the northeast corner at the corner of Charles Street and Brighton Road. The site has a cross fall of around 4.1m (RL38.62 southwest corner to RL 34.52 northeast corner).

The proposal involves a centrally located service core with apartments organised to its either side (west – Ground Upper and east – Ground Lower). The finished floor levels (FFL) of Ground Upper is at RL37.1, while the Ground Lower is at RL 35.55. Stairs are proposed to bridge the 1.55m level difference between the two ground levels as well as the to access the at grade car parking from Ground Lower. Based on the information provided (Refer Drawing A106, prepared by SARM Architects), it is established that the proposal will result in extensive excavation up to a depth of between 0.3m to 1.4m.

In addition, excavation is also proposed along the southern boundary and the driveway off Brighton Road located around 1.4m below the existing natural ground requiring a 1.5m high retaining wall. This is considered entirely unnecessary (Refer Figure 01). Excavation to a depth of 2.7m is also proposed to accommodate a rainwater tank (RWT) and ODS, which is considered appropriate (Refer Figure 2).

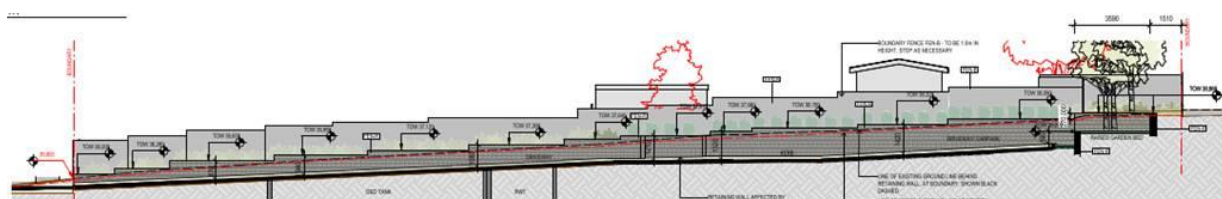


Figure 01 – Proposed excavation along the Southern Boundary



Figure 02 – Proposed excavation to accommodate rainwater tank and OSD



Part 3.5.1 of GRDCP requires developments to not alter natural or existing ground levels by more than 1m in low density areas. The objective is to *ensure that the natural topography and landform is maintained, and the amount of excavation is minimised*.

The proposal does not comply with the GRDCP requirements. It is considered that the split level / lowering of the Ground Lower is proposed not to address existing topography but for the proposal to comply with the maximum permitted building height. The proposed excavation is not considered an appropriate response to the existing topography and inconsistent with the GRDCP objectives. Hence, the extend of the proposed excavation for the driveway and the units is not supported.

**It is recommended** that the proposal should be amended to provide an appropriate response to the existing topography. Steps are a barrier to visual and physical engagement with the public domain, car parking and open space. Hence, the design should be amended for the proposed ground floor FFLs to be relative to the existing topography and the habitable areas above the existing natural ground to provide the required amenity. The building should be designed to minimise the number of steps across the site. The driveway should also be located above the natural ground with gradual gradients to address the slope.

## **2.0 Building Entry / Communal Circulation Space / Public Private Interface**

A single pedestrian building entry is proposed off Charles Street (The FFL of the building entry is not provided). The main entry door is inset (around 14m from the street) with access from a 1.5m – 2m wide open to sky communal circulation space (CCS) between U01 and U07. The CCS leads to the main building door and the split level lift lobby (Refer Section 1.0 for detail on level changes) with the sightlines terminating at the blank wall. The stairs adjacent the lift that bridges the 1.55m level difference between the lobbies also leads to the at grade car parking and the bin room to the south of the Ground Upper lobby. The ground floor apartments along both the streets do not have direct access from the streets.

The CCS is cluttered with garden beds, while the building entry is not visible from the public domain. Accordingly, the design presents safety and trip hazard concerns for the residents. Lack of individual access to ground floor units also fails to enhance street activation. The building entry is not clearly identifiable, and its design does not contribute to the identity of the building or enhance the streetscape. In addition, the lift lobby has interface with the bin room and car parking area. This is a missed opportunity to provide landscaped area/communal open space at the interface of the lobby to provide direct visual and physical access to the landscaped area and enhance amenity.

**It is recommended that** the building entry should be designed to be identifiable and contributes to the identity of building and character of the streetscape. The building entry should be at the same level as the footpath to enhance public/private connection and any level changes should be incorporated within the design of the building. The ground floor units should have direct access from the street to enhance street activation.



The pedestrian access (CCS) should be direct and devoid of obstructions providing direct sight lines between the public / private domain and lifts enhancing safety. Relocating the bin room and the 3 car parking spaces adjacent the bin room and replacing them with landscaping should be considered with visual and physical connection with the lift lobby. This will require designing the building to address existing topography as per recommendation under Section 1.0 (Landscaping is discussed further under Section 3.1). The lift lobby at ground should also have access to natural light and ventilation.

### 3.0 Amenity

#### 3.1 Landscape Area / Communal Open Space

Clause 108 (d) of State Environmental Planning Policy (Housing) 2021 (SEPP Housing) requires the following:

*(d) for a development application made by a social housing provider—at least 35m<sup>2</sup> of landscaped area per dwelling*

For the subject site minimum 490m<sup>2</sup> landscaped area / communal open space (COS) is required. Information provided has the proposed landscaped area to be 673m<sup>2</sup> (Refer Drawing A000). The proposed landscape area numerically complies with the requirement. However, concerns are raised on the quality of the majority of the landscaped area, which is not considered to be well integrated with the built form and not well designed consolidated spaces with adequate amenity. The landscaped areas in the four corners of the site have limited access. For example, Unit U04 residents will either have to go all the way outside the building to access the landscaped area in the northeast corner or through the parking to access the landscaped area in the southeast corner. This is not considered a good design outcome.

In addition, some of the spaces are not wide enough to either grow trees or serve as passive recreational spaces / communal open spaces (COS). For example, the narrow linear space in the northwest corner between U06 and the parking space along the western boundary is neither usable nor desirable. The proposed landscaped area is more a “left over” space with no direct OR equitable access from communal circulation spaces. As discussed under Section 2.0, the lift lobby has interface with the bin room and car parking area instead of landscaped space. In addition, the level difference between the Ground Lower disconnects the landscape area from the built form and makes is less desirable.

Lastly, lack of landscaping along the western and southern boundaries is also of concern as it does not provide appropriate transition or visual/acoustic buffer to the neighbouring properties.



**It is recommended** that the design should be amended for the landscape area to be well integrated with the design of the building with equitable and seamless access from all apartments. The landscape areas should be a network of well connected spaces providing opportunity for group and individual recreation and activities and not fragmented spaces with limited amenity. As discussed under Section 2.0, a design option could be for the main building entry / lift lobby to connect/lead to the landscaped area to the south.

It is acknowledged that the SEPP (Housing) 2021 is silent on the sunlight access to landscaped area. However, 2 hours of sunlight to minimum 50% of landscaped areas is considered a minimum requirement for all other developments and should be adopted.

Windows and private open spaces should be provided with aspects of landscape area to provide passive surveillance to the COS. If any fencing is proposed for the courtyards at ground, it should be a palisade fence. This will not only make the COS more appealing and usable but will also contribute to the appeal of the development.

Lastly, parking and driveways should be consolidated and located away from the boundary to accommodate planting to provide visual / acoustic buffer as well as for the proposal to be consistent with the future desired character of the area.

### 3.2 Deep Soil

Clause 108 (f) of (SEPP Housing) requires the following:

*(f) a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 3m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site*

The subject site requires a minimum 287.385m<sup>2</sup> deep soil area with minimum 3m dimensions. The deep soil area calculations provided has included areas between 1.2m-2m in the deep soil calculation (area along Charles Street frontage), which is not accurate. In addition, 65% of the deep soil is also not located to the rear.

Hence, the proposal does not comply with the SEPP Housing deep soil requirement.

**It is recommended** that the proposal should be amended for it to comply with the SEPP Housing minimum deep soil area requirements including the minimum 3m dimensions and location to the rear.

### 3.3 Solar Access

SEPP (Housing) 2021, Clause 108 Non-discretionary development standards for independent living units prescribes the following:





(g) at least 70% of the dwellings receive at least 2 hours of direct solar access between 9am and 3pm at mid-winter in living rooms and private open spaces,

(h) for a dwelling in a single storey building or a dwelling located, wholly or in part, on the ground floor of a multi-storey building—

(i) at least 15m<sup>2</sup> of private open space per dwelling, and

(ii) at least 1 private open space with minimum dimensions of 3m accessible from a living area located on the ground floor,

The Seniors Living Check List provided states that 10/14 dwellings receive minimum 3 hours of sunlight. However, a shadow study has not been provided to confirm the solar access compliance.

### 3.4 Natural Ventilation

SEPP (Housing) 2021, Clause 101 under Design Principles states the following:

*The design of seniors housing should -*

*(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 Seniors Living Check List provided states that *natural ventilation is used as much as possible. Landscaping design incorporates trees to help in natural ventilation, softening winds and breezes entering the building.*

However, it should be noted in addition to landscaping, appropriate window and door openings appropriately located and of appropriate size should be provided to facilitate natural cross ventilation. Unit U01, 04, 05, 07, 08, 11, 12 and 14 are considered to not have access to cross ventilation (6 of 14 - 42.85% are cross ventilated).

**It is recommended that** the design should be amended for at least 60% of the units to be naturally cross ventilated as a good urban design practice.

### 4.0 Vehicular Access and Parking

The proposal in total provides for 7 at grade car parking spaces, 6 of which are located immediately south of U05 and the lift lobby. A driveway within the southern side boundary off Brighton Road provides vehicular access to the rear car parking spaces. An additional driveway is also proposed along the western boundary off Charles Street to access 1 disabled space. As discussed under Section 1.0, the driveway to the south is located below the existing natural ground requiring excavation to a depth of around 1.5m (FFLs not provided).



The 2 at grade car parking areas, associated driveways and the footpath for the garbage bin room results in extensive area of impervious surface resulting in separating the landscape area and its potential to provide a consolidated and connected network of open space. This is inconsistent with GRDCP objective under Section 6.2.12, which requires developments to minimise the adverse impact of vehicles on the amenity of the development, streetscape and neighbourhood. Provision of two driveways especially to access a single car parking space is considered excessive. While the location of the driveways adjacent the southern and western boundaries without adequate setbacks, inhibits inclusion of planting to enhance privacy and character of the area. The driveways along the boundaries are a visual intrusion and disrupts the streetscape.

The rear car parking also takes up the prime location with views from the lift lobby. The separation between the vehicles and the pedestrian path to the south is not considered adequate and inconsistent with GRDCP Objective under Section 6.2.12: *to ensure pedestrian ways provide safe and convenient access.*

**It is recommended that** the 2 proposed car parking areas should be consolidated to minimise the extent of impervious surface and eliminate the need for an additional driveway off Charles Street. It is acknowledged that cut and fill is discouraged in the low density residential area. However, given the scale of the development and lack of desirable COS / landscaping; provision of basement car parking, instead of at grade car parking should be considered especially since extensive excavation is proposed for the OSD and RWT. It is considered that 7 cars can easily be accommodated under This will minimise conflict between pedestrians and vehicles and also provide opportunity for a well-connected and accessible network of open space area for the residents.

Any basement parking and driveway should be contained within the building footprint, should be wholly below the natural ground and the proposal should comply with the deep soil and landscaping requirements especially planting along the southern and western boundaries.

## 5.0 Architectural Expression

An effort has been made to break the horizontality and the flat roof by introducing pitched roof forms at intervals. The building also Articulation also includes projecting and recessing elements, which is encouraging. However, the overall façade treatment and built form still lacks design excellence (Refer Figure 03).





*Figure 03: 3D View of the Proposed Development*

The east and west elevations lack thoughtful consideration of architectural detailing to make them interesting. The east and west elevations lack cohesive as the combination of built form with flat and pitched roofs appear as disconnected. The east and west elevations are dominated by brown receding metal cladding blank walls which are perceived as bulky. All elevations should be carefully designed to present interesting and aesthetically pleasing frontages and not just the street elevations. The recessing and projecting elements should follow a certain rhyme to make the facades interesting combined by change in materiality and architectural detailing.

The design of the corner of Charles Street and Brighton Road does not identify the corner / provide any prominence to identify the corner. The location of building services (substation, FH Booster etc) has not been identified on either the plans or elevations.

**It is recommended** that the bulk of the built form especially to the west and east should be broken by variation in architectural detailing or materiality. The roof form should add to the built form as well as the skyline and streetscape and form an integral part of the whole development. The northern façade should be enhanced by clearly distinguishable building entry and the street activated by incorporating separate building entries to the ground floor units.

This corner of Charles Street and Brighton Road should be redesigned to give prominence to the corner.

Detail design of the building services required to service the proposed building should be provided. The building services included should be integrated into the development and the façade design without compromising street activation and minimise the impact on the streetscape.





## Conclusion

The **proposal is not supported** in its current form. The proposal will require considerable amendments in order for it to be supportable from an urban design perspective.

## Trees and Landscaping

Council's Senior Landscape and Arboricultural Assessment Officer has undertaken a desktop assessment and provided the following comments:

### 1.0 Landscape Comments

I have reviewed Urban Design Comments and agree that the proposed landscaping is insufficient and does not meet the minimum SEPP Housing deep soil area requirements.

The landscape plans propose eleven (11) *Hymenosporum flavum* (Native Frangipanni) trees along the south-western boundary in a raised narrow garden bed between the boundary fence and retaining wall. This is an inappropriate growing environment that lacks sufficient soil volumes for these trees to reach their full growth potential (approx. 12 metres tall with a canopy spread of 6 metres). It is recommended that the proposed design is amended to better incorporate tree planting with the adjacent carpark, which would provide much needed canopy cover / shade and aid in reducing the effects of 'Urban Heat Island Effect'.

The proposed tree species on the Landscape Plans are predominately small canopy spread with a maximum spread of 5-6metres (2.5m / 3m radius). Given the scale of the project and many of the trees being located adjacent Brighton Road and Charles Street, there is scope to plant larger canopy trees that will provide greater benefits to the local area and to the amenity of the housing users. An opportunity exists to provide new street tree plantings on both Brighton Road and Charles Street.

### 2.0 Arboriculture Comments

The Arboricultural Impact Assessment (AIA) report assessed nine (9) existing trees within or adjacent the site that will be impacted by the proposed development. All existing trees within the site (5 trees) are proposed to be removed. These trees are not considered high value or a development constraint.

The AIA has not assessed the proposed Landscape Plans or any other subsurface Plans (except for Stormwater).

### Neighbouring Trees

T1 is a large mature *Juniperus communis* (Juniper) located in the neighbouring yard of 40 Bungalow Road. The tree has grown hard against the existing boundary fence with the subject site. The Juniper tree has a medium retention value and landscape rating. The



proposed soil cut to construct the new retaining wall (carpark) will have a 'major' encroachment within the Tree Protection Zone (TPZ).

T2 is a mature *Ligustrum lucidum* (Broad-leaf Privet) located in the rear yard of No. 40 Bungalow Road. The AIA states that a 'major' encroachment within the TPZ to facilitate the new retaining wall (carpark) will result in the Broad-leaf Privet becoming unstable and requiring removed. This species is on Council exempt species list; however landowners' consent will be required before the tree can be removed.

T3 is a mature *Syzygium paniculatum* (Magenta Lilly Pilly), that also located in the rear yard of No. 40 Bungalow Road. The proposed soil cut to construct the new retaining wall (carpark) will have a 'major' encroachment within the Tree Protection Zone (TPZ).

T4 is a mature *Archontophoenix cunninghamiana* (Bangalow Palm) in the front yard of No. 19A Charles Street. The Bangalow Palm has a high retention value and landscape rating. Due to the dense bulbous root system, unlike the branching roots systems of typical trees, the Bangalow Palm is unlikely to be affected by the proposed development if adequate tree protection measures are in place.

## Recommendations

- 1) That the proposed landscaping is amended to meet the minimum SEPP Housing deep soil area requirements.
- 2) That the design of the south-western retain wall is amended to provide adequate soil volumes for tree planting adjacent carpark, that would provide much needed canopy cover / shade and aid in reducing the effects of 'Urban Heat Island Effect'.
- 3) As recommended above, that the south-western retain wall be amended to reduce the 'major' impacts to neighbouring trees in the rear yard of No. 40 Bungalow Road. Note: T2 in rear yard of No. 40 Bungalow Road cannot be removed without Landowners Consent – if consent is not given, the proposed design must be amended to facilitate its retention.
- 4) Recommended that the Architect liaise with an AQF Level 5 Arborist to reduce 'major' impacts to neighbouring trees and to provide greater tree planting opportunities.
- 5) That the proposed tree species as detailed in the Landscape Plans are amended to tree species with larger canopies that will provide greater benefits to the local area and to the amenity of the housing users.
- 6) That the Landscape Plans are amended to include new street tree plantings on both Brighton Road and Charles Street.

From an Arboricultural and Landscape perspective the proposal is not supported in its current form.



## **Traffic and Parking**

Council's Senior Traffic Engineer has reviewed the site and provided the following comments:

### **1.0 Car Parking – Provision**

Car parking requirements are assessed using the SEPP (Housing)2021 as follows:

| Unit Type    | No. of Units | Rate/Unit | No. of Spaces Required | No. of Spaces Proposed  |
|--------------|--------------|-----------|------------------------|-------------------------|
| One bedroom  | 6            | 0.4       | 2.4                    |                         |
| Two bedrooms | 8            | 0.5       | 4                      |                         |
|              |              | TOTAL     | <b>6.4</b>             | <b>7</b> (3 accessible) |

**COMMENT:** The quantum of car parking proposed is **satisfactory**

### **2.0 Car Parking Areas – Access, Layout and Design**

The 7 on site car parking spaces are provided in two, separate at grade car parks with one car park catering for the parking of 6 vehicles and the other catering for the parking of 1 vehicle.

The largest car parking area containing 6 car spaces (with 2 being accessible) is located in the south-western corner of the site accessed via a single vehicle width driveway from Brighton Road.

The second car parking area providing a single vehicle (accessible) parking space is located adjacent to the western boundary with access via a single vehicle crossing from Charles Street.

Both car park area parking space dimensions, access aisle widths, driveway widths, driveway gradients and vehicle manoeuvring are considered satisfy the technical requirements of *AS/NZS 2890.1:2004 Parking Facilities Part 1 – off street car parking*.

**COMMENT:** Although the layout and design of the car parking areas satisfy the technical requirements of the Australian Standard, the proposed parking arrangements are **unsatisfactory** and the proposal is not supported for the following reasons:



- (a) The proposal for at grade parking in the south-west corner of the site with its associated 26m long driveway from Brighton Road and single vehicle space with associated 9m long driveway from Charles Street is considered creates an excessive area of hard paved surfacing and is contrary to the requirements of *GRDCP2021- s6.2.7 (c) "Landscaped Area and Private Open Space"* which states at (c) *"Minimise the extent of hard paved areas and facilitate rainwater infiltration to the water table"*
- (b) The car parking area and driveway adjacent to the southern boundary involves excavating existing ground levels to a depth of some 1.4m. Such excavation is contrary to the objectives and controls of s3.5.1 and s6.2.11 of *GRDCP2021* whereby excavation is to be minimized and the depth of excavation must not exceed 1m from existing ground levels. It is considered the depth of excavation proposed is as a result of the ground floor level of the building being lowered in order for the building to comply with maximum building heights. The southern boundary when viewed from within the site will have retaining walls of some 1.4m in height with a 1.8m high fence on top of that again. A boundary fencing height over 3m is excessive and unnecessary.

It is considered the topography of the site does not justify the extent of excavation proposed and proposed driveways and car parking areas should better match existing ground levels.

- (c) The proposal for two points of vehicle entry to this corner site is contrary to the requirements of *GRDCP 2021 s6.2.12 (3)* which states for corner sites, vehicular access should be provided to the street with the lesser traffic volumes which in this case is Brighton Road and s6.2.12 (6) which states vehicle crossings are to be positioned so that on street parking is maximised. The additional crossing on Charles Street unnecessarily reduces the availability for parking by other residents of that street.
- (d) Reversing a vehicle out of the site from the single, accessible parking space adjacent to the western boundary is considered unsatisfactory on pedestrian safety grounds. The resident using the space may have severe mobility issues and restricted movements and unable to sight pedestrians when crossing the Charles Street footpath. It is considered vehicle movements into and out of this accessible space should be in a forward direction at all times with manoeuvring to cater for such taking place within the site.
- (e) The washing of vehicles in the car park area without proper pollution control facilities results in pollutants entering the stormwater system and local waterways. Council's *GRDCP2021* requires multi-unit developments be provided with a designated vehicle wash bay.

Having regard to the above, it is considered the proposal should be amended in design to cater for the parking of all 7 vehicles, including the provision a separate vehicle wash bay, in a basement under the footprint of the building.



Such parking will improve landscaping and outside recreational areas for residents and have waste and recyclable storage areas removed from view and away from the southern, resident and visitor entry/exit point.

### 3.0 Traffic Generation

The assessment of traffic movements generated by the existing residential dwellings and those generated by the proposed unit development is carried out using the following industry standard documents:

- (a) Existing dwellings: “*Guide to Traffic Generating Developments*” – Issue 2.2 (RTA 2002)
- (b) Proposed development: *Technical Direction TDT 2013/04a – “Updated Traffic Surveys”* - RMS (August 2013)

| Dwelling Type                   | Traffic Generation Rates<br>(A.M. and P.M. Peak hours) | Vehicle Movements<br>(A.M. and P.M Peak hours) |
|---------------------------------|--|--|
| Existing dwellings (3)          | 0.85 trips per dwelling                                | 2.6  |
| Proposed Development (14 units) | 0.4 trips per unit                                     | 5.6  |
|                                 | <b>NET INCREASE</b>                                    | <b>3</b>                                       |

**COMMENT:** A net increase of 3 vehicle trips in both the A.M. and P.M. peaks is unlikely to have any noticeable impact on roads and intersections both close to and removed from the site. The proposal is **satisfactory** on traffic generation grounds.

### 4.0 ADDITIONAL MATTERS

#### Survey Plan prepared by TSS dated 26/5/2022.

Errors have been found in the above as follow:

#### **Incorrect boundary line – corner lot 15 in DP 35818:**

Sheets 1 and 2 of the “Detail & Contour Survey” prepared by TSS (Ref 220469 dated 26/05/2022) do not show the correct property boundaries for corner lot 15 (No. 9 Brighton Road) at the intersection of Charles Street and Brighton Road.

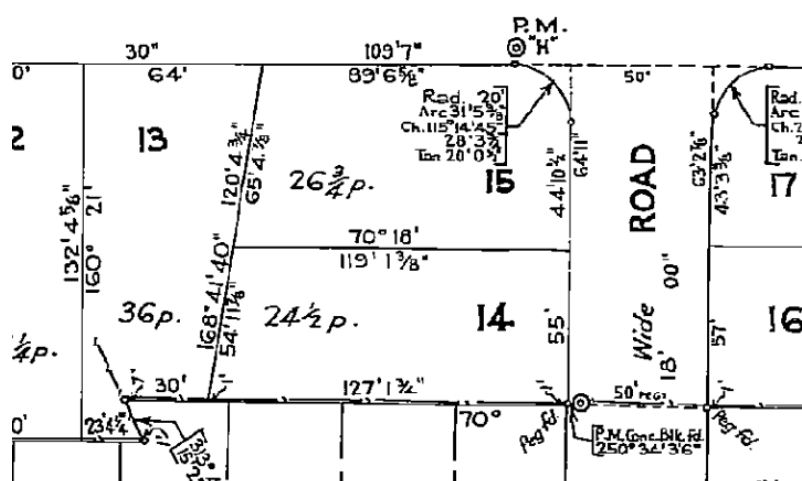




At "NOTE" in the top left corner of sheet 1 it states regarding boundary information that "...the location of property boundaries has been taken from the titled deposited plan".

Deposited Plan DP 35818 for corner lot 15 shows it has a 6.1m (20 foot) radius at the intersection of Charles Street and Brighton Road and not a straight boundary line as shown on the survey and architectural plans- see the extract below from Council's records relating to lot 15 DP 35818.

It is assumed in the consolidation of the 3 lots into 1 that the applicant is proposing to delete the curve and replace it with the straight boundary line however the survey plan showing what is understood to be existing boundaries should show them as per the DP.



**Incorrect site areas- lot 14 and lot 15:** There are discrepancies in the survey plan for the site areas of lots 14 and 15 compared to the DP as follows:

| Lot Number<br>in DP35818 | DP Site Area<br>(Perches) | DP Site Area<br>(Conversion to sqm) | TSS Survey<br>Plan Site Area<br>(sqm) | Survey Plan<br>Difference<br>(sqm) |
|--------------------------|---------------------------|-------------------------------------|---------------------------------------|------------------------------------|
| 14                       | 24.5                      | 619.67                              | 625.9                                 | +6.23                              |
| 15                       | 26.75                     | 676.58                              | 669.9                                 | -6.68                              |

**COMMENT:** It is considered the survey plan should be amended to reflect correct boundary lines for Lot 15 and correct site areas for lots 14 and 15.

## ***Stormwater Management***

*To be provided under separate cover when received.*

Should you need any further assistance, please do not hesitate to contact Georges River Council on 9330-6400.

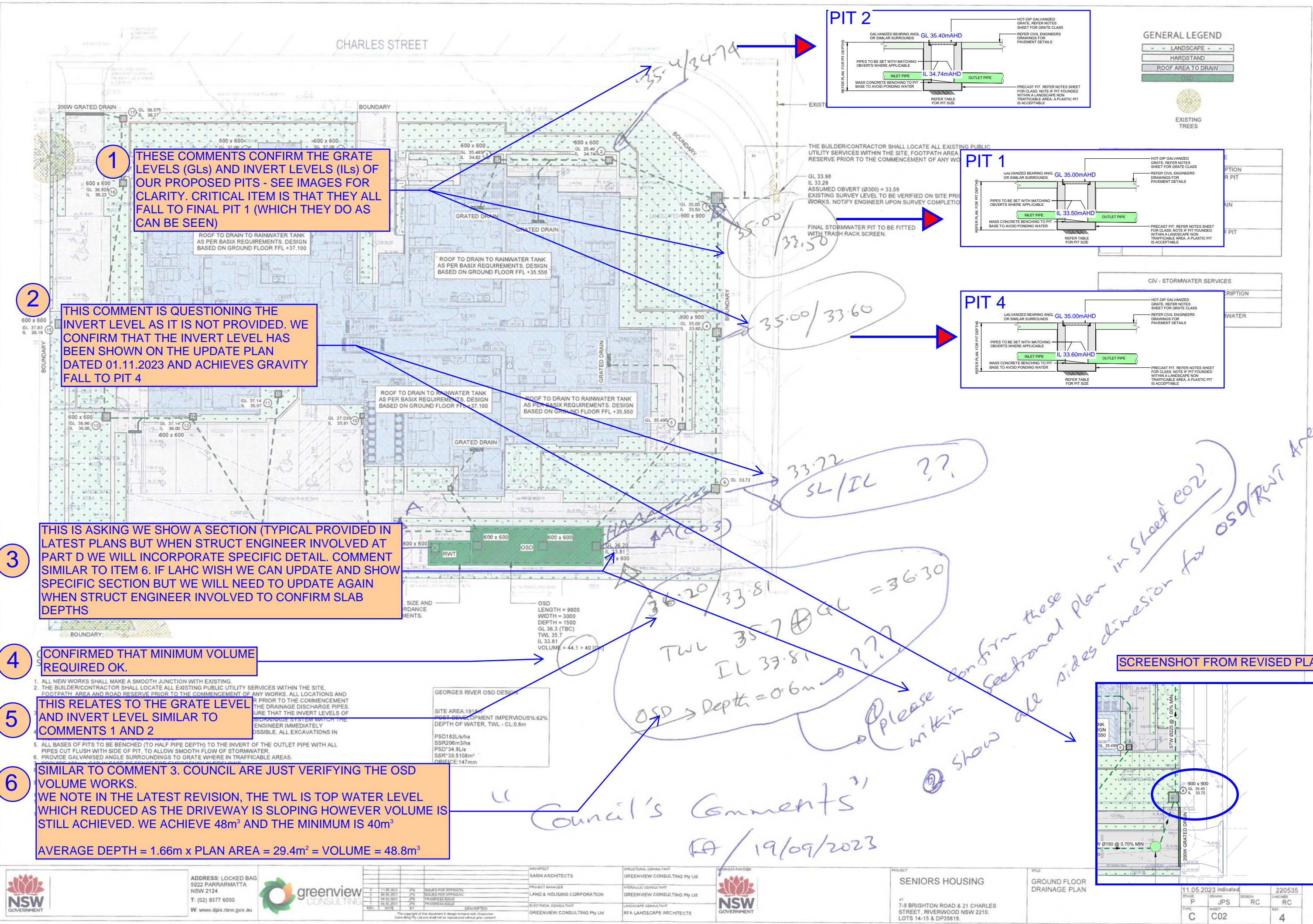
Yours sincerely



Linley Love  
**Coordinator Advisory & Specialist Assessment**







1 THESE COMMENTS CONFIRM THE GRATE LEVELS (GLs) AND INVERT LEVELS (ILs) OF OUR PROPOSED PITS - SEE IMAGES FOR CLARITY. CRITICAL ITEM IS THAT THEY ALL FALL TO FINAL PIT 1 (WHICH THEY DO AS CAN BE SEEN)

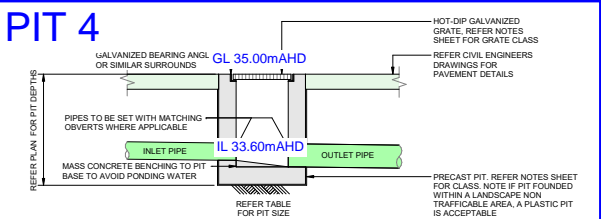
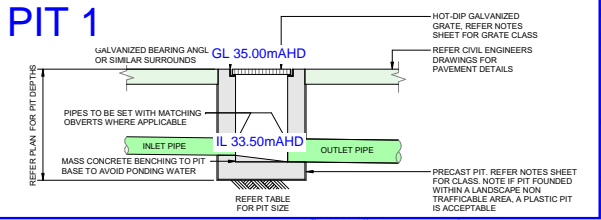
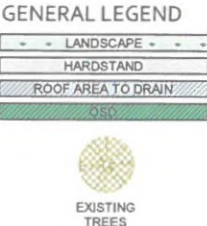
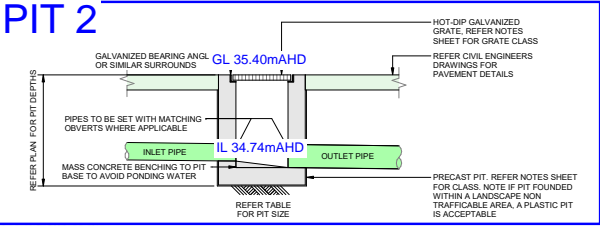
2 THIS COMMENT IS QUESTIONING THE INVERT LEVEL AS IT IS NOT PROVIDED. WE CONFIRM THAT THE INVERT LEVEL HAS BEEN SHOWN ON THE UPDATE PLAN DATED 01.11.2023 AND ACHIEVES GRAVITY FALL TO PIT 4

3 THIS IS ASKING WE SHOW A SECTION (TYPICAL PROVIDED IN LATEST PLANS BUT WHEN STRUCT ENGINEER INVOLVED AT PART D WE WILL INCORPORATE SPECIFIC DETAIL. COMMENT SIMILAR TO ITEM 6. IF LAHC WISH WE CAN UPDATE AND SHOW SPECIFIC SECTION BUT WE WILL NEED TO UPDATE AGAIN WHEN STRUCT ENGINEER INVOLVED TO CONFIRM SLAB DEPTHS

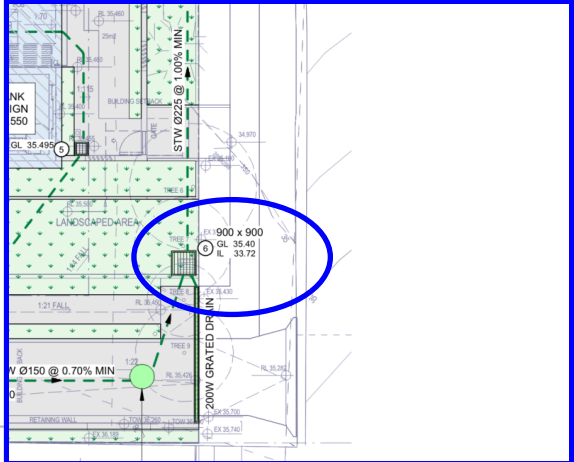
4 CONFIRMED THAT MINIMUM VOLUME REQUIRED OK.

5 THIS RELATES TO THE GRATE LEVEL AND INVERT LEVEL SIMILAR TO COMMENTS 1 AND 2

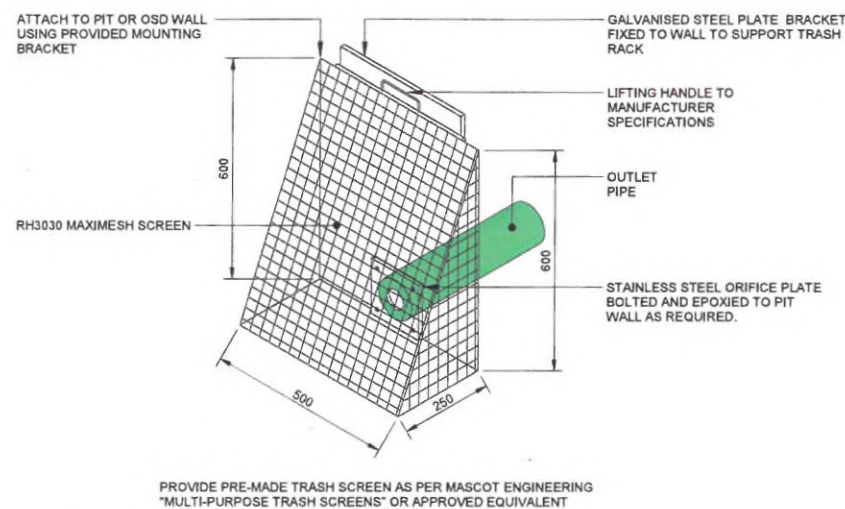
6 SIMILAR TO COMMENT 3. COUNCIL ARE JUST VERIFYING THE OSD VOLUME WORKS. WE NOTE IN THE LATEST REVISION, THE TWL IS TOP WATER LEVEL WHICH REDUCED AS THE DRIVEWAY IS SLOPING HOWEVER VOLUME IS STILL ACHIEVED. WE ACHIEVE 48m³ AND THE MINIMUM IS 40m³  
AVERAGE DEPTH = 1.66m x PLAN AREA = 29.4m² = VOLUME = 48.8m³



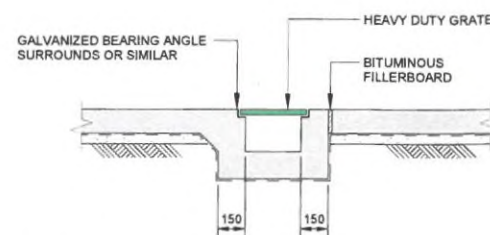
SCREENSHOT FROM REVISED PLANS



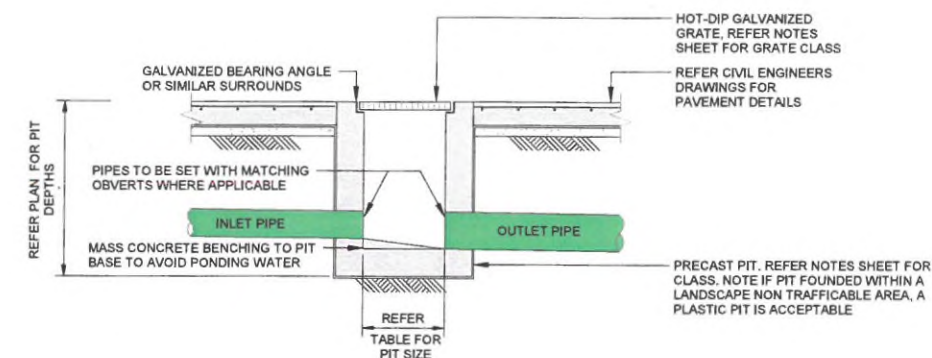




TYPICAL TRASH SCREEN DETAIL  
Scale: 1:10



TYPICAL GRATED DRAIN DETAIL  
Scale: 1:20



1. ENSURE CLIMB IRONS ARE PROVIDED UNDER LID AT 300 CTS TO COUNCIL'S SPECIFICATIONS WHERE PIT DEPTH IS DEEPER THAN 1000.
2. GREENVIEW RECOMMENDS THE PLUMBER PROVIDES 900mm x 3000mm LONG SUBSOIL DRAINAGE STUB PIPE SURROUNDED WITH 100mm THICKNESS OF NOMINAL 20mm COARSE FILTER MATERIAL WRAPPED IN GEOTEXTILE FILTER FABRIC. (BIDUM A24 OR APPROVED SIMILAR), TO BE PARALLEL TO UPSTREAM SIDE OF EACH INLET PIPE.

| PIT SIZE   |                 |
|------------|-----------------|
| DEPTH      | PIT DIMENSION   |
| 0 - 600    | 450 mm x 450 mm |
| 600 - 900  | 600 mm x 600 mm |
| 900 - 1200 | 600 mm x 900 mm |
| 1200 +     | 900 mm x 900 mm |

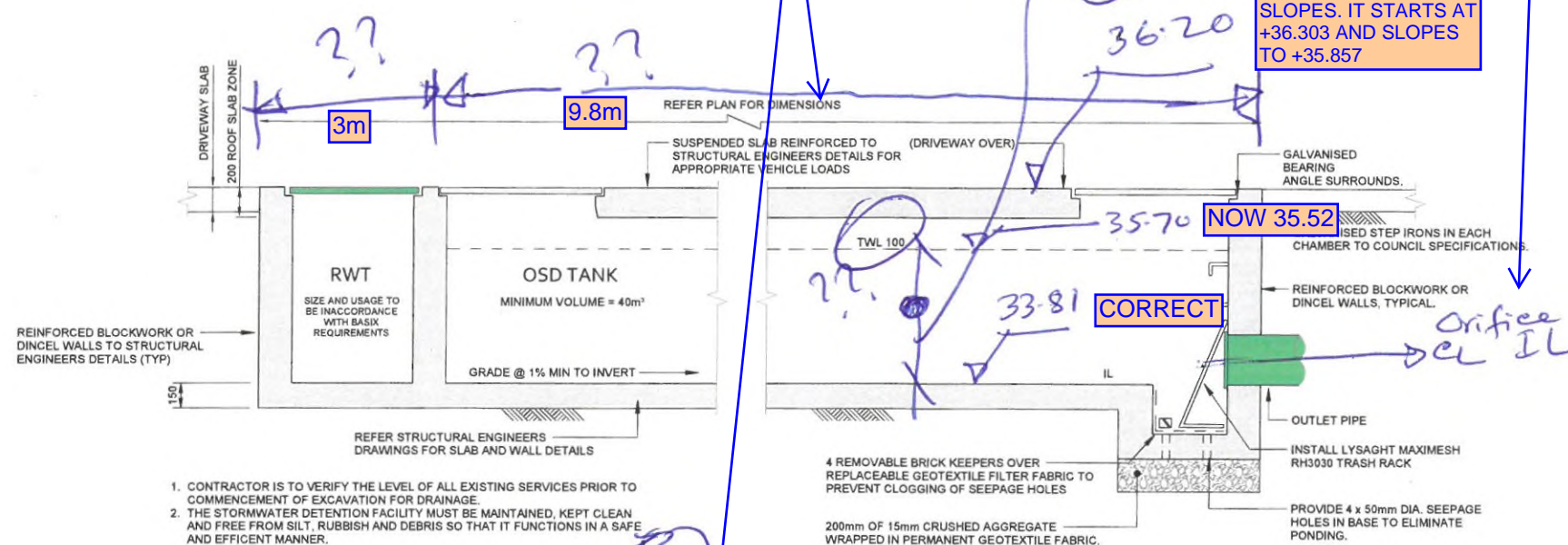
TYPICAL CONCRETE INLET PIT - CONCRETE SURFACE  
Scale: 1:20

5

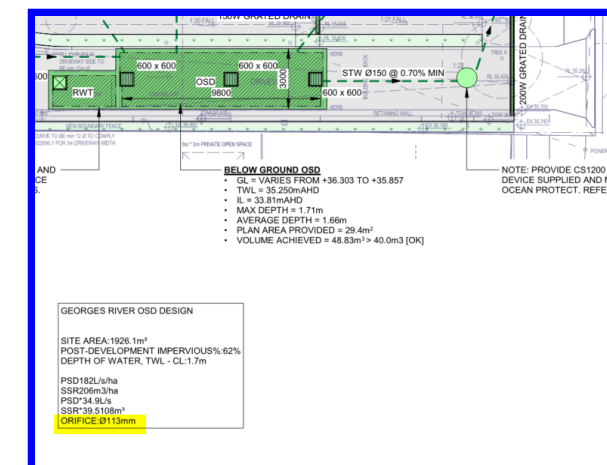
SIMILAR TO COMMENTS 3 AND 6 SPECIFIC SECTION. THIS SHOULD NOT HOLD PART 5 AS VOLUME OF OSD IS ACHIEVED AND THIS DETAILING CAN BE CAPTURED IN STAGE D.

7

THE ORIFICE HAS BEEN NOTED IN THE REVISED PLAN.



ON SITE DETENTION TANK DETAIL - DRIVEWAY AREA WITH ORIFICE PLATE  
Scale: 1:20



ADDRESS: LOCKED BAG  
5022 PARRAMATTA  
NSW 2124  
T: (02) 9377 6000  
W: www.dpie.nsw.gov.au



| REV | DATE       | BY  | DESCRIPTION         |
|-----|------------|-----|---------------------|
| 1   | 11.08.2023 | SPS | ISSUED FOR APPROVAL |
| 2   | 04.09.2023 | SPS | ISSUED FOR APPROVAL |
| 3   | 09.02.2023 | SPS | PROGRESS ISSUE      |

|                       |                              |
|-----------------------|------------------------------|
| ARCHITECT             | SARM ARCHITECTS              |
| PROJECT MANAGER       | LAND & HOUSING CORPORATION   |
| ELECTRICAL CONSULTANT | GREENVIEW CONSULTING Pty Ltd |
| STRUCTURAL CONSULTANT | GREENVIEW CONSULTING Pty Ltd |
| HYDRAULIC CONSULTANT  | GREENVIEW CONSULTING Pty Ltd |
| LANDSCAPE CONSULTANT  | RFA LANDSCAPE ARCHITECTS     |



|         |  |
|---------|--|
| PROJECT | SENIORS HOUSING  |
| AT      | 7-9 BRIGHTON ROAD & 21 CHARLES STREET, RIVERWOOD NSW 2210. LOTS 14-15 & DP35818. |

|       |                                 |
|-------|---------------------------------|
| TITLE | SITE STORMWATER DETAILS SHEET 1 |
|-------|---------------------------------|

|         |                      |
|---------|----------------------|
| STATUS  | PRELIMINARY          |
| DATE    | 11.05.2023 indicated |
| SCALE   |                      |
| FILE    |                      |
| JOB     | 220535               |
| STAGE   | P                    |
| DRAWN   | JPS                  |
| DESIGN  | RC                   |
| CHECKED | RC                   |
| TYPE    | C                    |
| SHEET   | C03                  |
| REV     | 3                    |

Our ref: SUB23/101269

«First\_Name»  
«Company»  
«Address\_Line\_1»  
«Address»

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



17 August 2023

**Subject:** Proposed seniors housing development

Dear «First\_Name»

I am writing to you from the NSW Land and Housing Corporation (LAHC) to update you about our plans to redevelop the housing site at 7-9 Brighton Road, Peakhurst and 21 Charles Street, Riverwood and seek your feedback on our detailed design.

## What we are proposing

We are proposing to replace the existing aged properties with a new two-storey seniors housing development which will include:

- 14 homes in total — 6 one-bedroom units and 8 two-bedroom units
- 7 on-site car parking spaces
- landscaping and fencing across the site
- internal lift.

## What we have done so far

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

- traffic and parking
- privacy
- pressure on existing stormwater and sewage infrastructure.

In response to this feedback, I can confirm:

- A traffic and parking assessment has been completed and finds that the new development is not expected to have any significant impacts on the local street network, or parking.
- The proposal provides 7 on-site car parking spaces which is consistent with the requirements in the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) for this type of development.
- The proposed development has been designed to maximise privacy and minimise overlooking onto neighbouring yards, through building setbacks, privacy screens, careful window placement and landscaping, including screen plantings at the side and rear boundaries.



## Department of Planning and Environment

- Boundary fencing 1.8 metres high will be provided along the boundaries of the development.
- Stormwater for the development will be designed in accordance with the Georges River Stormwater Management Policy 2020; and Sydney Water will be consulted for their requirements in relation to the works over the existing sewage pipe.

### What is happening now?

We have recently completed a detailed design process for 7-9 Brighton Road, Peakhurst and 21 Charles Street, Riverwood. We invite your feedback, which will be carefully considered by our design and planning team as part of the assessment of this project and where possible we will incorporate your feedback in the designs.

Please find enclosed:

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

### How you can submit your feedback

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

All feedback should be received **by 12 September 2023** to give us enough time to consider it and you will receive confirmation that your feedback has been received.

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Cotterill".

Carmen Cotterill  
**Acting Manager Community Engagement**  
**NSW Land and Housing Corporation**

### About the NSW Land and Housing Corporation

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

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

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



**From:** [Atalay Bas](#)  
**To:** [CommunityEngagement](#)  
**Subject:** RE: NSW Land and Housing | Scope of Notification- 21 Charles Street and 7-9 Brighton Road, Peakhurst  
**Date:** Tuesday, 8 November 2022 11:16:12 AM  
**Attachments:** [image001.png](#)

---

Hi Cindy,

Can the following additional properties also be notified of the proposal:

- 11 to 15 Charles Street
- 54 to 48 Bungalow Road
- 24 to 30 Bungalow Road

Thanks

Atalay



### Atalay Bas Coordinator Advisory and Specialist Assessment

Georges River Council  
Corner of MacMahon and Dora Streets  
Hurstville NSW 2220

**Phone:** +61293306095


**Mobile:** 0438408071

**Email:** [ABas@georgesriver.nsw.gov.au](mailto:ABas@georgesriver.nsw.gov.au)

[www.georgesriver.nsw.gov.au](http://www.georgesriver.nsw.gov.au)



Georges River Council acknowledges that Bidjegal people of the Eora Nation are the original inhabitants

and custodians of all land and water in the Georges River region. 

---

**From:** CommunityEngagement <CommunityEngagement@fac.s.nsw.gov.au>

**Sent:** Tuesday, 25 October 2022 2:17 PM

**To:** Georges River Council Mail <mail@georgesriver.nsw.gov.au>

**Cc:** CommunityEngagement <CommunityEngagement@fac.s.nsw.gov.au>; Elise Clark <Elise.Clark@fac.s.nsw.gov.au>

**Subject:** NSW Land and Housing | Scope of Notification- 21 Charles Street and 7-9 Brighton Road, Peakhurst

Attention: Planning

In accordance with Clause 43(1)(a) of the *State Environmental Planning Policy (Housing) 2021 (Housing SEPP 2021)*, NSW Land & Housing Corporation is requesting if Council would like to nominate any additional persons or property it considers necessary to be notified of a proposed seniors housing development of up to 14 units at 21 Charles Street and 7-9 Brighton Road, Peakhurst.

The proposal is 'development without consent' under the *Housing SEPP 2021*. NSW Land & Housing Corporation will therefore undertake a Review of Environmental Factors of the development under Part 5 of the *Environmental Planning and Assessment Act 1979* and consider any submissions from Council and neighbours before deciding whether or not to proceed with the proposed development.

Please find attached the proposed neighbour notification map and address list.

**Please respond to this email as soon as possible, with:**

1. **advice as to any additional properties Council deems it necessary to notify; or**
2. **confirmation that Council is satisfied with the proposed scope of notification.**

If you have any questions, please don't hesitate to contact the Community Engagement team on 1800 738 718 or via email at [CommunityEngagement@fac.s.nsw.gov.au](mailto:CommunityEngagement@fac.s.nsw.gov.au)

Regards

Cindy

**Cindy Cunningham**

**Community Engagement Officer, Delivery**

**Community Engagement Team**

Land and Housing Corporation | Department of Planning and Environment

T 1800 738 718 | E [CommunityEngagement@fac.s.nsw.gov.au](mailto:CommunityEngagement@fac.s.nsw.gov.au)

Locked Bag 5022 Parramatta NSW 2124

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



**Our Vision:** Together, we create thriving environments, communities and economies.

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

---

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*Georges River Council acknowledges the Bidjigal people of the Eora Nation, who are the traditional inhabitants and custodians of all land, water and sky in the Georges River area. We pay our respects to their Elders past, present and emerging.*

This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. **If you have received this e-mail in error please notify the originator of the message, delete the communication from your system and destroy any copies. Any unauthorised copying, disclosure or distribution is strictly prohibited.** This footer also confirms that this e-mail message has been scanned for the presence of computer viruses. Any views expressed in this message are those of the individual sender, except where the sender specifies and with authority, states them to be the views of Georges River Council. Scanning of this message is performed by Symantec E-mail Filter software in conjunction with virus detection software.

**PLEASE CONSIDER THE ENVIRONMENT BEFORE YOU PRINT THIS E-MAIL**

Our ref: SUB23/94995

«First\_Name»

40 Bungalow Road

Peakhurst NSW 2210

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



<Click here and then tap arrow to enter a date>

---

## Subject: Consent for Tree Removal

Dear «First\_Name»

I am writing to you regarding a proposal for new housing by the NSW Land and Housing Corporation (LAHC) at 21 Charles Street and 7-9 Brighton Road, Riverwood.

LAHC consulted with neighbours in December 2022 and have commenced preparing an updated design. We would like to invite you to meet with us to discuss what we're proposing prior to developing the design further.

As the registered property owners of **40 Bungalow Road, Peakhurst**, we are seeking your consent for the removal of the Broad-leaf Privet tree, at the rear of your property, identified as TREE 2 (T2) on the enclosed aerial photograph (**Figure A**). The root system of T2 extends into the area of excavation required to construct a new retaining wall and driveway for the development, as shown on the enclosed diagram (**Figure B**). A consultant Arborist has advised LAHC that were the retaining wall and driveway to be constructed as proposed, the tree would be destabilised to such an extent that it would likely not survive.

The tree removal would be undertaken by contractors engaged by LAHC and at no cost to you.

LAHC's role is to actively grow and manage the supply of the right types of housing, at the right time, in the right areas, for people in need in our communities. Having access to safe housing assists people to pursue health, education and employment opportunities, allowing them to thrive and strengthen the communities where we all live. This project will help house more vulnerable people in better quality homes.

**We would like to speak with you either by phone or in person about the proposal and ask you to consider providing us with your consent for new fencing along our common boundary and the removal of your tree (T2).**

Could you please call 1800 738 718 or email [CommunityEngagement@facns.nsw.gov.au](mailto:CommunityEngagement@facns.nsw.gov.au) to advise me of your phone number so I can call you to arrange a suitable day and time to discuss this further on site or over the phone?

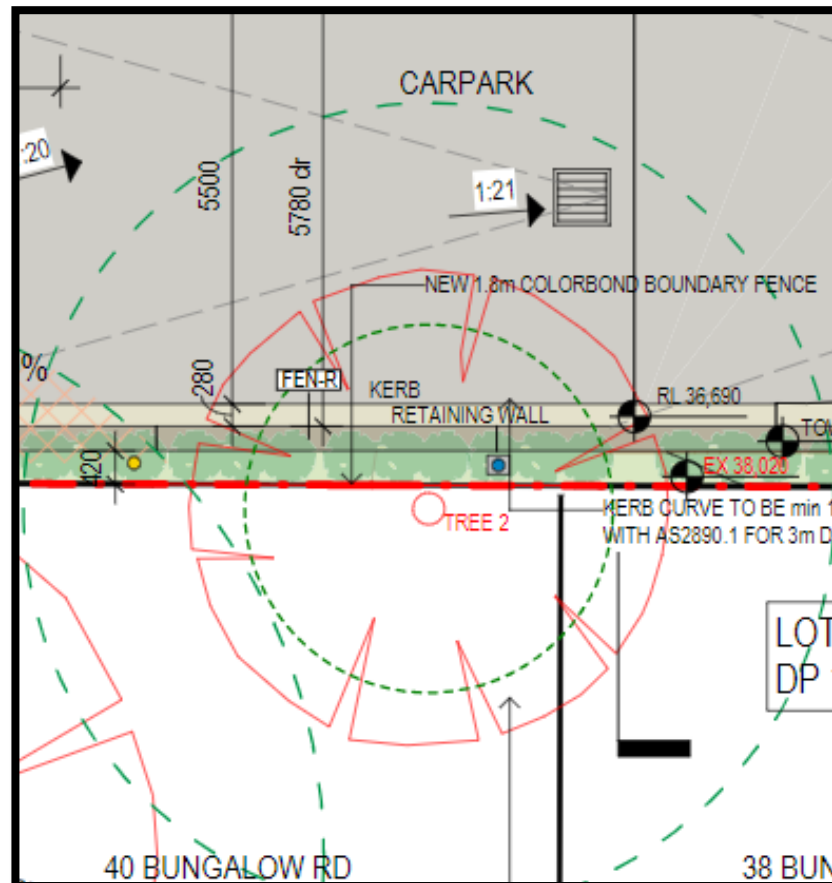


## Department of Planning and Environment

Figure A – Aerial photograph – Development Site and T2



Figure B - TREE 2 (T2) and the proposed new retaining wall and driveway



LAHC will continue to keep you updated on the progress of the development proposal for 21 Charles Street and 7-9 Brighton Road, Riverwood, including writing to you again to invite your feedback on the proposed design.

Yours sincerely,

*Chicomb*

Christine Unicomb

Acting Manager, Community Engagement

NSW Land and Housing Corporation

### About the NSW Land and Housing Corporation

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

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

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



## Department of Planning and Environment

### Consent Form:

I/we, \_\_\_\_\_ (the owner/s of 40 Bungalow Road, Peakhurst) acknowledge and consent to the removal of tree (T2) as detailed in the below diagram, in relation to the redevelopment by NSW Land and Housing Corporation at 21 Charles Street and 7-9 Brighton Road, Riverwood.

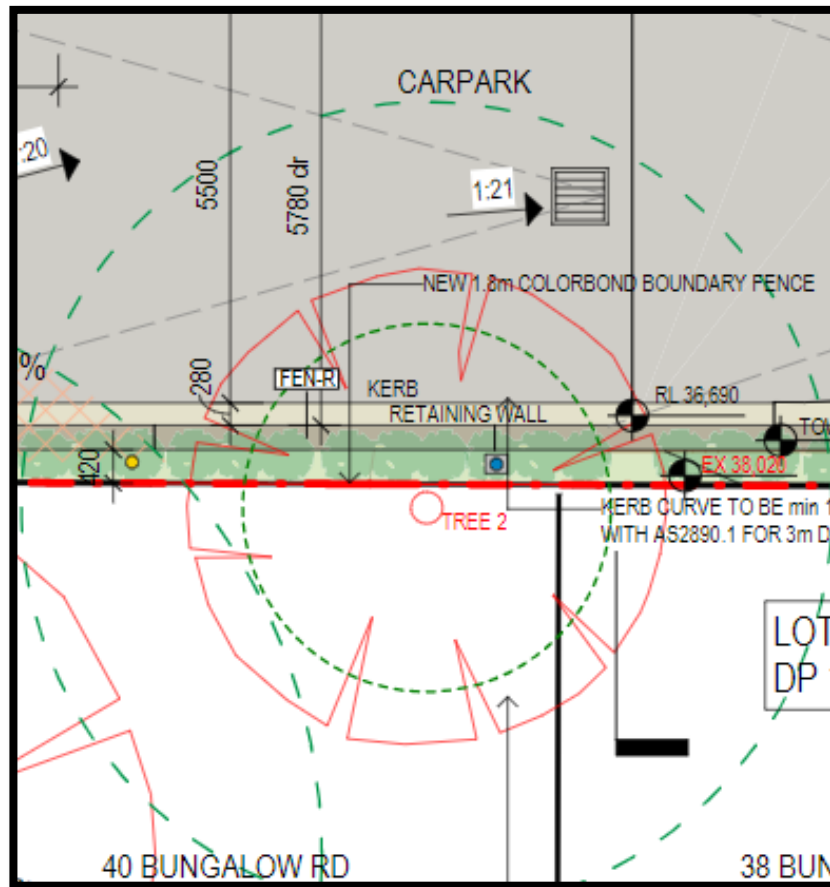
I understand that this consent is subject to the NSW Land and Housing Corporation obtaining development approval to proceed with the redevelopment of the site.

I also understand that the NSW Land and Housing Corporation will incur the costs of removing the tree.

Figure A – Aerial photograph – Development Site and T2



Figure B - TREE 2 (T2) and the proposed new retaining wall and driveway



Insert owners name:

Registered owners of 40 Bungalow Road, Peakhurst

X

X



**From:** [CommunityEngagement](#)  
**To:** [REDACTED]  
**Cc:** [CommunityEngagement](#)  
**Subject:** CM: RE: Consent for tree removal  
**Date:** Wednesday, 31 May 2023 4:05:01 PM  
**Attachments:** [image001.png](#)

---

Good afternoon [REDACTED]

Thank you for sending the copy of the signed consent, in principal, to remove the Broad-leaf Privet tree and root system at the rear of your property at 40 Bungalow Road, Peakhurst. We will write to you again in the coming weeks to share the draft design for the proposed redevelopment at 21 Charles Street and 7-9 Brighton Road, Riverwood, and invite your feedback. If you have any questions please contact the Community Engagement Team at [CommunityEngagement@facs.nsw.gov.au](mailto:CommunityEngagement@facs.nsw.gov.au) or call 1800 738 718.

Thank you again.

Kind regards,

**Elise Clark**

**Senior Community Engagement Officer | Partnerships and Communications**

Land and Housing Corporation | Department of Planning and Environment

T 0477 885 147 | E [CommunityEngagement@facs.nsw.gov.au](mailto:CommunityEngagement@facs.nsw.gov.au)

Locked Bag 5022 Parramatta NSW 2124

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



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

**From:** [REDACTED]

**Sent:** Tuesday, 30 May 2023 8:24 PM

**To:** CommunityEngagement <[CommunityEngagement@facs.nsw.gov.au](mailto:CommunityEngagement@facs.nsw.gov.au)>

**Subject:** CM: Consent for tree removal

**This Message Is From an Untrusted Sender**

You have not previously corresponded with this sender.

Dear Carmen

As per your document SUB23/94995

Attached is the authorisation document and my phone number is [REDACTED] if you need to discuss further.