



Aboriginal Housing Office, NSW Government  
Level 5, 4 Parramatta Square,  
12 Darcy Street Parramatta NSW 2150

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9 June 2023

**Review of Environmental Factors, pursuant to Part 5 of the  
Environmental Planning and Assessment Act 1979**

**Proposed Seniors Housing, at 56 Fuller Street Mount Druitt**

***Introduction***

This *Review of Environmental Factors* (REF) is provided under Part 5 of the Environmental Planning and Assessment Act 1979. The review is required by the Aboriginal Housing Office as part of the assessment process that may occur for some types of development. The intention of this REF is to examine the significance of likely environmental impacts of a proposal and the measures required to mitigate any adverse impacts to the environment.

The proposed subject works may be assessed by way of State Environmental Planning Policy SEPP (Housing) 2021 (Housing SEPP). The Housing SEPP permits some works to be carried out by relevant authorities without the need for development approval from a local authority. Instead the works can be self-assessed by the relevant authority under Part 5 of the Environmental Planning and Assessment Act 1979. In effect the relevant Authority is able to authorise the building works provided that it is satisfied that the works fall within the parameters of the noted works that may be carried out, and also satisfied that the works have no unreasonable adverse impacts to neighbours or to the area or environment generally. In order to determine whether the works are satisfactory in terms of environmental and amenity impacts, the various relevant legislative requirements and considerations are provided below.

This advice will provide an assessment of the proposal in these terms and will advise as to whether the works will likely cause any harm to the amenity of the area and environment generally.

## DOCUMENT SIGN-OFF

### REF Prepared by:

Having prepared the Review of Environmental Factors:

1. I have declared any possible conflict of interests (real, potential or perceived) to the Director, Property, Aboriginal Housing Office.
2. I do not consider I have any personal interests that would affect my professional judgement.
3. I will inform the Director, Property as soon as I become aware of a possible conflict of interest.

Name: Damian O'Toole

Designation: Principal

Signature: 

Date: 9.6.2023

### Peer Reviewed by:

Name: Sophie Litherland

Designation: Senior Associate, Willowtree Planning Pty Ltd

Signature: 


Date: 13 June 2023

### REF Endorsed by:

I certify that I have reviewed this Review of Environmental Factors.

Name: Ash Livingston

Designation: Director - Property, Aboriginal Housing Office

Signature: 

Date: 22/06/2023

### REF Authorised for Issue by:

Having endorsed the Review of Environmental Factors:

1. I have declared any possible conflict of interests (real, potential or perceived) with the Director, Property.
2. I do not consider I have any personal interests that would affect my professional judgement.
3. I will inform Famey Williams, Chief Executive, Aboriginal Housing Office as soon as I become aware of a possible conflict of interest.

Name: Loshana Karthikeya

Designation: Director Performance and Finance

Signature: 

Date: 10 July 2023

***The Site***

The subject site is known as 56 Fuller Street, Mount Druitt.

The site is on the northern side of Fuller Street, close to the junction with Dixon Street, and opposite Rupertswood Park. The site is within the local government area of Blacktown City Council.

The site is rectangular in shape and has a site area of 1011.7m<sup>2</sup>, with dimensions of approximately 20.1m in width and 50.3m in length.

The site is within the R2 Low Density Residential Zone under Blacktown Local Environmental Plan 2015. The immediately adjoining sites contain low density residences.

The dwelling shown on the site in figure 1 below, has been demolished.



**Fig 1 – Aerial image of subject site.**

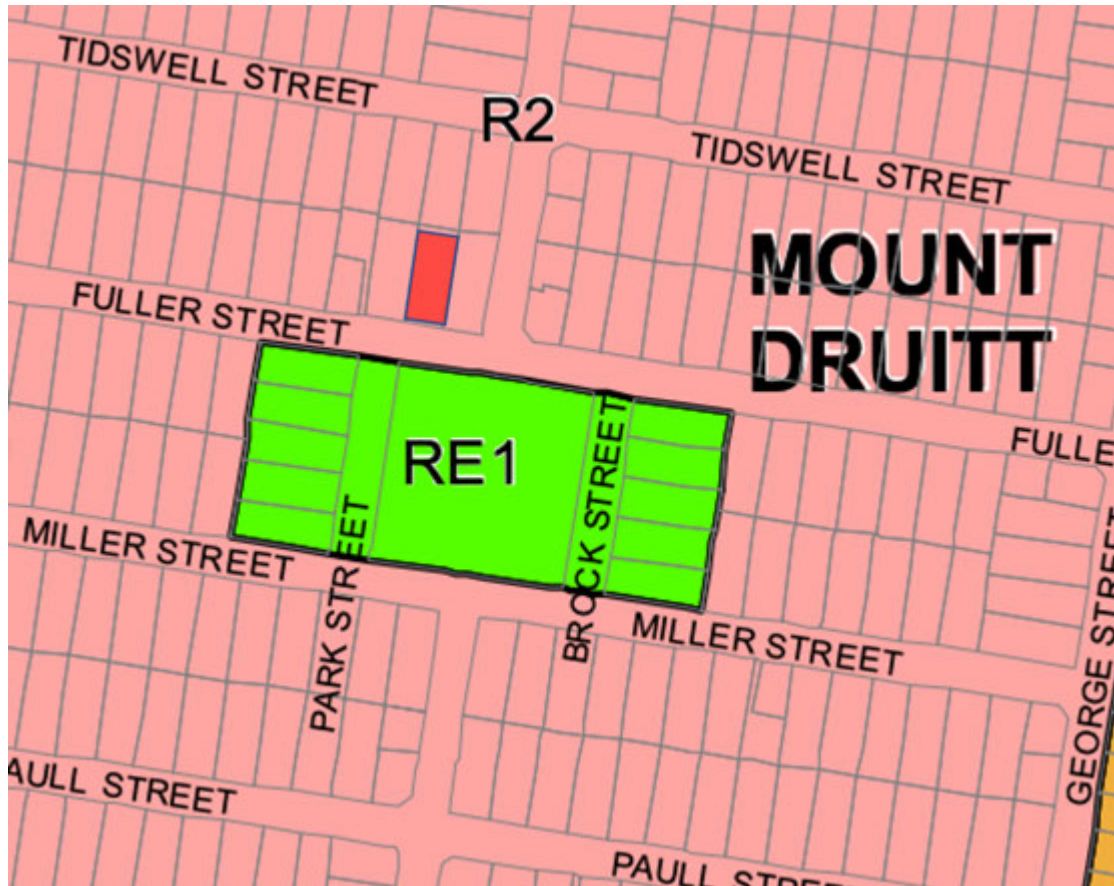


Fig 2 – Land Use Zoning Map – Extract from Blacktown LEP 2015 (Map 9). Subject site is highlighted.

### ***Proposal***

The project will provide a multi-unit development containing 6 x two-bedroom units. Three off street parking spaces are provided.

The development will be two storeys in height within two distinct and separate buildings. A small building containing two dwellings is closest to the street and four dwellings within a larger building is provided further to the rear of the site.

Landscaping is provided within the front and rear setbacks and additionally some screen planting is provided along the side setbacks. The driveway is provided to the eastern side of the site, providing access to the three parking spaces.

The building form is contemporary with a gable roof form facing the street. The walls are masonry to the ground level and have lightweight cladding to the upper level. The roof material is metal sheeting and openings are aluminum framed. Habitable room windows face the street.

The buildings will present well to the street and make a positive contribution to the area.

The works will provide six separate units, each with two bedrooms and one bathroom. Each unit has a private open space area. The private open spaces are separated from the dwelling



The dwellings are set well away from the side boundaries with the upper-level balconies set at least 6m from side boundaries. Each balcony/terrace is screened to provide privacy.

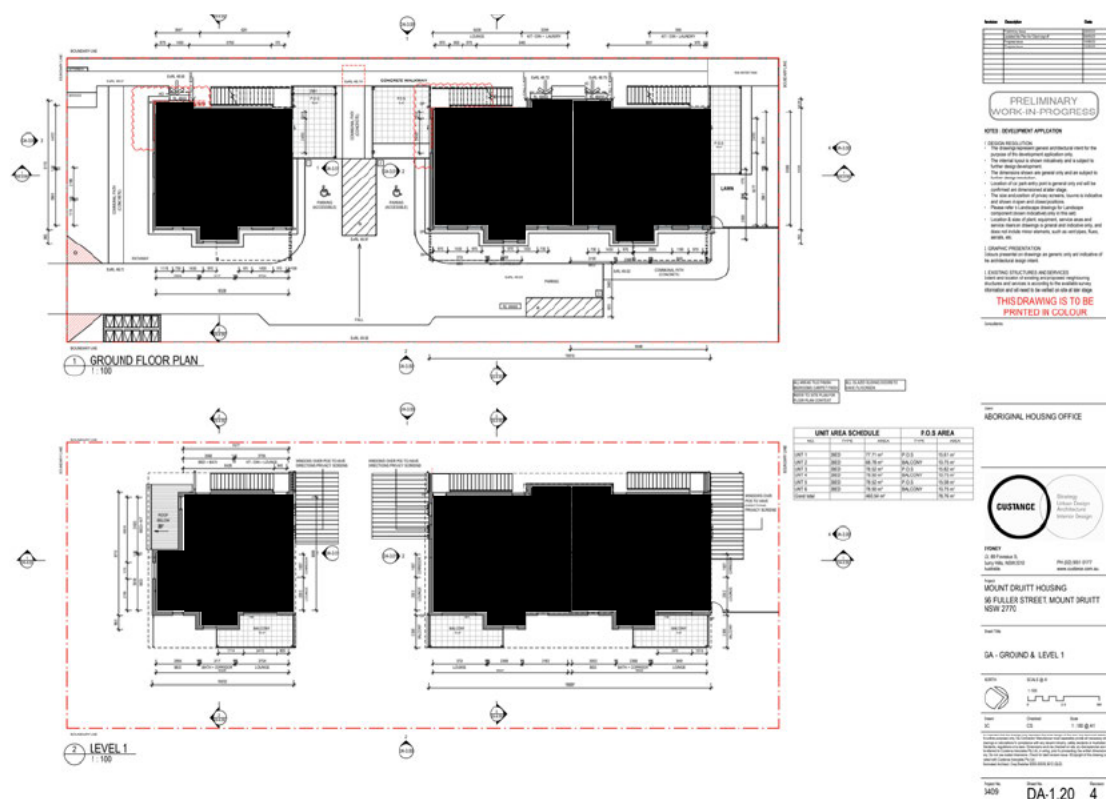
Communal open space is provided to the rear of the site.

Access to the units is via a pedestrian access along the western edge of the site. The upper-level units are accessed from stairs along the western side. Separate vehicular access is provided via the driveway along the eastern edge.

A waste bin enclosure is provided to the front of the driveway.

The site does not contain a critical habitat or any threatened species.

The project is part of a wider program of providing improved housing to the Aboriginal community.



**Fig 3 – Ground and first floor plans.**



Fig 4 – Perspective images of the subject proposal.

### Other Reports

This REF should be read in conjunction with the following consultants reports and drawings:

Architect and Landscape Architect	Custance
Structural	Jones Nicholson
Civil and stormwater	Jones Nicholson
Electrical	Jones Nicholson
Hydraulic/ Fire Services	Jones Nicholson
Acoustic	To be nominated (most likely Acoustic Logic)
Access	Accessi
BCA	Formiga 1
BASIX/ Natthers	Jones Nicholson
Traffic	Traffix
Quantity Surveyor	Mitchell Brandtman
Arborist	Advanced Treescape Consulting

### Stakeholder Consultation

The proposal has been notified to adjoining neighbours during the notification process. The views of adjoining landowners and occupiers were requested and no submissions were received. Council was also consulted, and Council confirmed that no comments were to be provided in respect of the proposal. Appropriate notification has been undertaken.

### Legislation - State Environmental Planning Policy (Housing) 2021

Division 6 of SEPP (Housing) 2021 permits the Aboriginal Housing Office (AHO) to carry out some building works without the need for development approval.

The works can be assessed by the AHO under Part 5 of the Environmental Planning and Assessment Act 1979. In effect the AHO is able to authorise the building works provided that it is satisfied that the works fall within the parameters of the noted works that may be carried out, and also satisfied that the works have no adverse impact to the amenity of the area and environment generally. Subdivision 2 of Part 5 of the EP&A Act 1979 requires the determining authority (AHO) to consider the environmental impacts of the development.

Matters for consideration in Division 6 of the Housing SEPP are considered later in this REF.

***Matters to be considered for Assessment using relevant planning controls and relevant legislation for Part 5 Assessment***

In order to undertake the assessment of the proposed works, a Review of Environmental Factors (REF) under Part 5 Division 1 (Part 5 assessment) of the Environmental Planning and Assessment Act 1979 (EP&A Act), must be provided. This document provides the considerations that must be taken into account when determining this assessment. These considerations are contained within various Environmental Planning Instruments, and other relevant legislation. These works will need to be determined by the 'public authority' as the nominated determining authority under the Act.

The REF should address all relevant factors of the Environmental Planning and Assessment Regulation 2021 (as amended) and the Commonwealth Environmental Protection and Biodiversity Conservation Act (as amended).

The Environmental Planning and Assessment Act 1979 provides for the creation and implementation of State Environment Planning Policies (SEPPs) and Local Environment Plans (LEP) – (Environmental Planning Instruments, or EPIs) and can be used to determine whether an activity is permissible and desirable.

The relevant EPIs and other legislation are addressed below as required to be addressed under Clause 171(2) of the Environmental Planning and Assessment Regulation Act (as amended) and the Commonwealth Environmental Protection and Biodiversity Conservation Act (as amended) are addressed below.

**Environmental Factors as noted in Clause 171(2) of the EP&A Regulation**







<p>determining authority's website or the NSW planning portal if—</p> <p>(a) the activity has a capital investment value of more than \$5 million, or</p> <p>(b) the activity requires an approval or permit as referred to in any of the following provisions before it may be carried out—</p> <p>(i) <a href="#">Fisheries Management Act 1994</a>, sections 144, 201, 205 or 219,</p> <p>(ii) <a href="#">Heritage Act 1977</a>, section 57,</p> <p>(iii) <a href="#">National Parks and Wildlife Act 1974</a>, section 90,</p> <p>(iv) <a href="#">Protection of the Environment Operations Act 1997</a>, sections 47–49 or 122, or</p> <p>(c) the determining authority considers that it is in the public interest to publish the review.</p> <p>(5) The review must be published under subsection (4)—</p> <p>(a) before the activity commences, or</p> <p>(b) if publishing the review before the activity commences is not practicable—as soon as practicable, and no later than 1 month, after the activity commences.</p> <p>(6) Subsection (4) does not apply in relation to a review of an activity—</p> <p>(a) that belongs to a class specified by the Planning Secretary in a notice published on the Department's website for the purposes of this section, or</p> <p>(b) to which an approved code under Division 6 applies.</p> <p>(7) If a provision of an approved code under Division 6 applies to a determining authority's exercise of functions under the Act, section 5.5, the provision of the approved code prevails to the extent of an inconsistency with a provision of this section.</p>	<p>N/A. The capital value is less than \$5 million.</p> <p>N/A.</p> <p>N/A.</p> <p>N/A.</p> <p>N/A.</p> <p>The development is not significant.</p> <p>N/A.</p> <p>N/A.</p> <p>N/A.</p> <p>N/A.</p> <p>N/A.</p>	
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(8) Subsection (4) applies on and from 1 July 2022.	Noted.	
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## State Environmental Planning Policy (Housing) 2021

### Chapter 2, Part 2, Division 6 Residential development—Aboriginal Housing Office and Land and Housing Corporation

Clause/Requirement	Summary of proposal	Compliance/Non-Compliance
<b>42 Development may be carried out without consent</b> (1) This Division applies to residential development if— (a) the development is permitted with consent on the land under another environmental planning instrument, and (b) all buildings will have a height of not more than 9m, and (c) the development will result in 60 dwellings or less on a single site, and (d) for development on land in an accessible area—the development will result in at least the following parking spaces— (i) for each dwelling containing 1 bedroom—0.4 parking spaces, (ii) for each dwelling containing 2 bedrooms—0.5 parking spaces, (iii) for each dwelling containing at least 3 bedrooms—1 parking space, and (e) for development on land that is not in an accessible area—the development will result in at least the following parking spaces— (i) for each dwelling containing 1 bedroom—0.5 parking spaces, (ii) for each dwelling containing 2 bedrooms—1 parking space,	<p>The development is permitted with consent under Blacktown LEP 2015. The use falls into the definition of Seniors Housing. The height of the development is up to 8.8m from ground level. Six dwellings are proposed.</p> <p>N/A.</p> <p>The site is within an accessible area. 3 car spaces are provided, being 0.5 space per unit (6 units).</p> <p>N/A.</p> <p>N/A.</p> <p>N/A.</p>	<p>Complies. The development is for Seniors Housing which may take the form of a group of independent living units. Complies.</p> <p>Complies.</p> <p>Complies.</p>

<p>(iii) for each dwelling containing at least 3 bedrooms—1.5 parking spaces.</p> <p>(2) This Division applies to the following development if the development is permitted on the land under another environmental planning instrument—</p> <p>(a) the demolition of buildings and associated structures if the building or structure is on land—</p> <p>(i) that is non-heritage land, and</p> <p>(ii) that is not identified in an environmental planning instrument as being within a heritage conservation area,</p> <p>(b) the subdivision of land and subdivision works.</p> <p>Note — Section 32 prohibits the subdivision of a boarding house.</p> <p>(3) This Division does not apply to—</p> <p>(a) development to which this Part, Division 5 applies, or</p> <p>(b) development that is part of a project, or part of a stage of a project, that the Minister determined under the Act, former section 75P to be subject to the Act, Part 4.</p> <p>(4) Development to which this Division applies may be carried out by or on behalf of a relevant authority without development consent.</p> <p>(5) <a href="#">State Environmental Planning Policy (Transport and Infrastructure) 2021</a>, sections 2.15 and 2.17 apply to the development and, in the application of the sections—</p> <p>(a) a reference in section 2.15 to “this Chapter” is taken to be a reference to this section, and</p>	<p>Site is not a heritage item or within a heritage area.</p> <p>Subdivision is not proposed.</p> <p>N/A. The form is not a residential flat building. N/A.</p> <p>Noted that development consent is not required.</p> <p>2.15 - This section does not apply.</p>	<p>Complies. Complies.</p> <p>Complies.</p> <p>Complies.</p>
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<p>(ii) Land and Housing Corporation Dwelling Requirements, published by the Land and Housing Corporation in September 2020, and</p> <p>(g) if the development is for the purposes of manor houses or multi dwelling housing (terraces)—consider the relevant provisions of the Codes SEPP, Part 3B.</p> <p>(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.</p> <p><b>44 Exempt development</b></p> <p>(1) Development for the following purposes is exempt development if it is carried out by or on behalf of a relevant authority in relation to housing and does not involve the use of external combustible cladding, within the meaning of the <a href="#">Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021</a>—</p> <p>(a) repairs and maintenance work,</p> <p>(b) non-structural renovations and building alterations.</p> <p>(2) Development for the purposes of landscaping and gardening is exempt development if it is carried out by or on behalf of a relevant authority in relation to residential development.</p>	<p>N/A.</p> <p>N/A. The development is for independent living units.</p> <p>Noted.</p> <p>N/A. The work does not fall under Exempt development.</p>	
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## State Environmental Planning Policy (Housing) 2021

### Chapter 3, Part 5, Housing for seniors and people with a disability

Clause/Requirement	Summary of proposal	Compliance/Non-Compliance
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<p><b>Land to which Part applies</b></p> <p><b>Division 1</b></p> <p><b>79</b> This Part applies to land in the following zones—</p> <p>(a) Zone RU5 Village,</p> <p>(b) Zone R1 General Residential,</p> <p>(c) Zone R2 Low Density Residential,</p> <p>(d) Zone R3 Medium Density Residential,</p> <p>(e) Zone R4 High Density Residential,</p> <p>(f) Zone B1 Neighbourhood Centre,</p> <p>(g) Zone B2 Local Centre,</p> <p>(h) Zone B3 Commercial Core,</p> <p>(i) Zone B4 Mixed Use,</p> <p>(j) Zone B5 Business Development,</p> <p>(k) Zone B6 Enterprise Corridor,</p> <p>(l) Zone B7 Business Park,</p> <p>(m) Zone B8 Metropolitan Centre,</p> <p>(n) Zone SP1 Special Purposes, (o) Zone SP2 Infrastructure, (p) Zone RE2 Private Recreation.</p> <p><b>81 Seniors housing permitted with consent</b></p> <p>Development for the purposes of seniors housing may be carried out with development consent—</p> <p>(a) on land to which this Part applies, or</p> <p>(b) on land on which development for the purposes of seniors housing is permitted under another environmental planning instrument.</p>	<p>The site is within the R2 Low Density Residential Zone under Blacktown LEP 2015.</p> <p>Seniors Housing is permitted under Blacktown LEP 2015.</p> <p>Definition of Seniors Housing is taken from the Standard Instrument.</p> <p><b>seniors housing</b> means a building or place that is—</p> <p>(a) a residential care facility, or</p> <p>(b) a hostel within the meaning of <a href="#">State Environmental Planning Policy (Housing) 2021</a>, Chapter 3, Part 5, or</p> <p>(c) a group of independent living units, or</p> <p>(d) a combination of any of the buildings or places referred to in paragraphs (a)–(c),</p>	<p>Complies.</p> <p>Complies. The built form takes that of a group of independent living units.</p>
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<p><b>Division 3</b>  <b>Development Standards</b>  <b>84 Development standards—general</b></p> <p>(1) This section applies to development for the purposes of seniors housing involving the erection of a building.</p> <p>(2) Development consent must not be granted for development to which this section applies unless—</p> <p>(a) the site area of the development is at least 1,000m<sup>2</sup>, and</p> <p>(b) the frontage of the site area of the development is at least 20m measured at the building line, and</p> <p>(c) for development on land in a residential zone where residential flat buildings <b>are not permitted</b>—the development will not result in a building—</p> <p>(i) with a height of more than 9.5m, or</p> <p>(ii) with more than 2 storeys if the building is adjacent to the boundary of the site area.</p> <p>(3) The development may result in a building with a height of not more than 11.5m if servicing equipment on the roof of the building—</p> <p>(a) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and</p>	<p>and that is, or is intended to be, used permanently for—</p> <p>(e) seniors or people who have a disability, or</p> <p>(f) people who live in the same household with seniors or people who have a disability, or</p> <p>(g) staff employed to assist in the administration of the building or place or in the provision of services to persons living in the building or place, but does not include a hospital</p> <p>The site area is 1011.7m<sup>2</sup>.</p> <p>The site frontage is 20.1m.</p> <p>RFBs are not permitted in the R2 Zone.</p> <p>Building height is 8.8m.</p> <p>The development is 2 storeys.</p> <p>N/A in this instance.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
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<p>(b) is limited to an area of no more than 20% of the surface area of the roof.</p> <p>(4) Subsection (2)(a) and (b) do not apply to development the subject of a development application made by the following —</p> <p>(a) the Land and Housing Corporation,</p> <p>(b) another social housing provider.</p>	<p>A social housing provider (AHO) will provide these dwellings in any case.</p>	<p>Complies.</p>
<p><b>Schedule 4 Standards</b></p> <p><b>2 Siting standards</b></p> <p>(1) Wheelchair access If the whole of the site has a gradient of less than 1:10, 100% of the dwellings must have wheelchair access by a continuous accessible path of travel (within the meaning of AS 1428) to an adjoining public road or an internal road or a driveway that is accessible to all residents.</p> <p>(2) If the whole of the site does not have a gradient of less than 1:10,</p> <p>(a) the percentage of dwellings that must have wheelchair access must equal the proportion of the site that has a gradient of less than 1:10, or 50%, whichever is the greater, and</p> <p>(b) the wheelchair access provided must be by a continuous accessible path of travel (within the meaning of AS 1428.1) to an adjoining public road or an internal road or a driveway that is accessible to all residents.</p>	<p>Refer to the access report.</p> <p>The site is accessible throughout at ground floor level.</p> <p>The development is compliant with AS 1428:1.</p> <p>The site is flat.</p>	<p>Complies.</p> <p>Complies.</p>
<p>(3) Common areas</p> <p>Access must be provided in accordance with AS 1428.1 so that a person using a wheelchair can use common areas and common facilities associated with the development.</p>	<p>Provided.</p>	<p>Complies.</p>

<p><b>3 Security</b></p> <p>(a) Lighting must be designed and located so as to avoid glare for pedestrians and adjacent dwellings, and</p> <p>(b) must provide at least 20 lux at ground level</p> <p><b>4 Letterboxes</b></p> <p>Letterboxes -</p> <p>(a) must be situated on a hard standing area and have wheelchair access and circulation by a continuous accessible path of travel (within the meaning of AS 1428.1), and</p> <p>(b) must be lockable, and</p> <p>(c) must be located together in a central location adjacent to the street entry or, in the case of independent living units, must be located together in one or more central locations adjacent to the street entry.</p> <p><b>5 Private car accommodation</b></p> <p>If car parking (not being car parking for employees) is provided:</p> <p>(a) car parking spaces must comply with the requirements for parking for persons with a disability set out in AS 2890.6, and</p> <p>(b) 10% of the total number of car parking spaces (or at least one space if there are fewer than 10 spaces) must be designed to enable the width of the spaces to be increased to 3.8 metres, and</p> <p>(c) any garage must have a 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.</p> <p><b>6 Accessible entry</b></p>	<p>Designed to comply.</p> <p>Lighting level will be at least 20lux.</p> <p>Appropriate letter box is provided.</p> <p>Designed to comply. Designed to comply.</p> <p>Designed to comply. Refer to the access report.</p> <p>1 space is provided to comply.</p> <p>N/A.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies. Complies.</p> <p>Complies.</p> <p>Complies.</p>
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<p>Every entry (whether a front entry or not) to a dwelling, not being an entry for employees, must comply with clauses 4.3.1 and 4.3.2 of AS 4299.</p>	<p>Designed to comply. Refer to the access report.</p>	<p>Complies.</p>
<p><b>7 Interior: general</b></p> <p>(1) Internal doorways must have a minimum clear opening that complies with AS 1428.1.</p> <p>(2) Internal corridors must have a minimum unobstructed width of 1,000 millimetres.</p> <p>(3) Circulation space at approaches to internal doorways must comply with AS 1428.1.</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p><b>8 Bedroom</b></p> <p>At least one bedroom within each dwelling must have—</p> <p>(a) an area sufficient to accommodate a wardrobe and a bed sized as follows—</p> <p>(i) in the case of a dwelling in a hostel—a single-size bed,</p> <p>(ii) in the case of an independent living unit—a queen-size bed, and</p> <p>(b) a clear area for the bed of at least—</p> <p>(i) 1,200 millimetres wide at the foot of the bed, and</p> <p>(ii) 1,000 millimetres wide beside the bed between it and the wall, wardrobe or any other obstruction, and</p> <p>(c) 2 double general power outlets on the wall where the head of the bed is likely to be, and</p> <p>(d) at least one general power outlet on the wall opposite the wall where the head of the bed is likely to be, and</p> <p>(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</p>	<p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>

<p>(f) wiring to allow a potential illumination level of at least 300 lux.</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p><b>9 Bathroom</b></p>		
<p>(1) At least one 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 AS 1428.1—</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p>(a) a slip-resistant floor surface, (b) a washbasin with plumbing that would allow, either immediately or in the future, clearances that comply with AS 1428.1,</p>	<p>Designed to comply with all. Refer to the access report.</p>	<p>Complies. Complies.</p>
<p>(c) a shower that complies with AS 1428.1, except that the following must be accommodated either immediately or in the future—</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p>(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.</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p>(2) Subsection (1)(c) does not prevent the installation of a shower screen that can easily be removed to facilitate future accessibility.</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p></p>	<p>Noted.</p>	<p>Complies.</p>
<p><b>10 Toilet</b></p>		
<p>A dwelling must have at least one toilet on the ground (or main) floor and be a visitable toilet that complies with the requirements for sanitary facilities of AS 4299.</p>	<p>Designed to comply. Refer to the access report.</p>	<p>Complies.</p>
<p><b>11 Surface finishes</b></p>		
<p>Balconies and external paved areas must have slip-resistant surfaces.</p>		

<p><b>12 Door hardware</b> Door handles and hardware for all doors (including entry doors and other external doors) must be provided in accordance with AS 4299.</p> <p><b>13 Ancillary items</b> Switches and power points must be provided in accordance with AS 4299.</p> <p><b>Part 2 Additional standards for independent living units</b></p> <p><b>14 Application of standards in this Part</b> The standards set out in this Part apply in addition to the standards set out in Part 1 to any seniors housing consisting of independent living units.</p> <p><b>15 Living room and dining room</b> (1) A living room in an independent living unit must have— (a) a circulation space in accordance with clause 4.7.1 of AS 4299, and (b) a telephone adjacent to a general power outlet. (2) A living room and dining room must have wiring to allow a potential illumination level of at least 300 lux.</p> <p><b>16 Kitchen</b> A kitchen in an independent living unit must have— (a) a circulation space in accordance with clause 4.5.2 of AS 4299, and (b) a circulation space at door approaches that complies with AS 1428.1, and (c) the following fittings in accordance with the relevant subclauses of clause 4.5 of AS 4299— (i) benches that include at least one work surface at least 800 millimetres</p>	Refer to the access report.	Complies.
	Designed to comply.	Complies.
	Designed to comply.	Complies.
	Noted.	
	Designed to comply.	
	Refer to the access report.	Complies.
	Designed to comply.	Complies.
	Designed to comply.	Complies.

<p>in length that comply with clause 4.5.5(a),</p> <p>(ii) a tap set (see clause 4.5.6),</p> <p>(iii) cooktops (see clause 4.5.7), except that an isolating switch must be included,</p> <p>(iv) an oven (see clause 4.5.8), and</p> <p>(d) “D” pull cupboard handles that are located towards the top of below-bench cupboards and towards the bottom of overhead cupboards, and</p> <p>(e) general power outlets—</p> <p>(i) at least one of which is a double general power outlet within 300 millimetres of the front of a work surface, and</p> <p>(ii) one of which is provided for a refrigerator in such a position as to be easily accessible after the refrigerator is installed.</p>	<p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p> <p>Designed to comply.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
<p><b>17 Access to kitchen, main bedroom, bathroom and toilet</b></p> <p>In a multi-storey independent living unit, the kitchen, main bedroom, bathroom and toilet must be located on the entry level.</p>	<p>Designed to comply.</p>	<p>Complies.</p>
<p><b>18 Lifts in multi-storey buildings</b></p> <p>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.</p>	<p>Provided.</p>	<p>Complies.</p>
<p><b>19 Laundry</b></p> <p>An independent living unit must have a laundry that has—</p>	<p>There is an exemption for LAHC/AHO developments for no lift to be provided.</p>	<p>Complies via exemption.</p>

<p>(a) a circulation space at door approaches that complies with AS 1428.1, and</p> <p>(b) provision for the installation of an automatic washing machine and a clothes dryer, and</p> <p>(c) a clear space in front of appliances of at least 1,300 millimetres, and</p> <p>(d) a slip-resistant floor surface, and</p> <p>(e) an accessible path of travel to any clothes line provided in relation to the dwelling.</p>	<p>Laundry provided to each dwelling that satisfies these requirements.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
<p><b>20 Storage for linen</b></p> <p>An independent living unit must be provided with a linen storage in accordance with clause 4.11.5 of AS 4299.</p>	<p>N/A.</p>	<p>Complies.</p>
<p><b>21 Garbage</b></p> <p>A garbage storage area must be provided in an accessible location.</p>	<p>Linen storage area provided.</p>	<p>Complies.</p>
<p><b>88 Restrictions on occupation of seniors housing</b></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</p>	<p>Garbage storage provided.</p> <p>Senior's housing provided. The use is permitted.</p>	<p>Complies.</p> <p>Complies.</p>



<p>accommodation to which the development relates.</p> <p><b>93 Location and access to facilities and services—-independent living units</b></p> <p>(1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services —</p> <p>(a) by a transport service that complies with subsection (2), or</p> <p>(b) on-site.</p> <p>(2) The transport service must—</p> <p>(a) take the residents to a place that has adequate access to facilities and services, and</p> <p>(b) for development on land within the Greater Sydney region—</p> <p>(i) not be an on-demand booking service for the transport of passengers for a fare, and</p> <p>(ii) be available both to and from the site at least once between 8am and 12pm each day and at least once between 12pm and 6pm each day, and</p> <p>(c) for development on land that is not within the Greater Sydney region—be available both to and from the site during daylight hours at least once each weekday.</p> <p>(3) For the purposes of subsections (1) and (2), access is adequate if—</p> <p>(a) the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and</p> <p>(b) the distance is accessible by means of a suitable access pathway, and</p>	<p>Noted.</p> <p>The site is within an accessible area which is 350m of bus stop which is served by 729/739, with greater frequency than the minimum required. The bus timetable and map showing proximity of the bus stops are provided with this submission.</p> <p>The bus goes to Mount Druitt and Blacktown.</p> <p>It is a public service, not on demand.</p> <p>The frequency is greater than this minimum requirement.</p> <p>N/A.</p> <p>The bus stop is 350m from the site.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
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<p>(c) the gradient along the pathway complies with subsection (4)(c).</p> <p>(4) In subsection (3)—</p> <p>(a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and</p> <p>(b) the distance is to be measured by reference to the length of the pathway, and</p> <p>(c) the overall average gradient must be not more than 1:14 and the gradients along the pathway must be not more than—</p> <p>(i) 1:12 for a maximum length of 15m at a time, or</p> <p>(ii) 1:10 for a maximum length of 5m at a time, or</p> <p>(iii) 1:8 for a maximum length of 1.5m at a time.</p>	<p>The access is by level footpath.</p> <p>The pathway is flat.</p> <p>Noted.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
<p><b>Division 6 Design principles</b></p> <p><b>99 Neighbourhood amenity and streetscape</b></p> <p>Seniors housing should be designed to—</p> <p>(a) recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, and</p> <p>(b) recognise the desirable elements of—</p> <p>(i) the location's current character, or</p> <p>(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</p>	<p>The units will be created with this specific function in mind.</p> <p>The development is small in scale and will sit well in this low density residential area.</p>	<p>Complies.</p> <p>Complies.</p>

<p>(c) complement heritage conservation areas and heritage items in the area, and</p> <p>(d) maintain reasonable neighbourhood amenity and appropriate residential character by—</p> <p>(i) providing building setbacks to reduce bulk and overshadowing, and</p> <p>(ii) using building form and siting that relates to the site's land form, and</p> <p>(iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and</p> <p>(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and</p> <p>(e) set back the front building on the site generally in line with the existing building line, and</p> <p>(f) include plants reasonably similar to other plants in the street, and</p> <p>(g) retain, wherever reasonable, significant trees, and</p> <p>(h) prevent the construction of a building in a riparian zone.</p>	<p>The building form is contemporary and contributory to the area.</p> <p>N/A.</p> <p>The setbacks to the side boundaries have maintained good solar access to neighbouring sites.</p> <p>The 2 storey scale is appropriate and compliant.</p> <p>The buildings are set well away from boundaries.</p> <p>Existing building line is generally maintained, as per the wording of the requirement.</p> <p>The landscaping is well considered.</p> <p>No significant trees are affected.</p> <p>N/A.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
<p><b>100 Visual and acoustic privacy</b></p> <p>Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and residents by—</p> <p>(a) using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and</p> <p>(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.</p> <p><b>101 Solar access and design for climate</b></p>	<p>The design has set balconies and windows well away from the side boundaries so as to maintain neighbour's amenity.</p> <p>Given the constraints of the site a reasonable effort has been</p>	<p>Complies. Existing planting maintains privacy to the western neighbour.</p>

<p>The design of seniors housing should—</p> <p>(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</p> <p>(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.</p>	<p>made to keep noise sensitive areas away from the driveway.</p> <p>Good access to daylight and sunlight is provided. The dwellings have at least in part a northerly orientation.</p> <p>Due to the site's orientation the neighbouring dwellings receive good solar access to their rear gardens and rear facing living spaces.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
<p><b>102 Stormwater</b></p> <p>The design of seniors housing should aim to—</p> <p>(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</p> <p>(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.</p>	<p>The development has been assessed by a hydraulic engineer and OSD is provided.</p> <p>The proposal has minimal stormwater impacts.</p>	<p>Complies.</p>
<p><b>103 Crime prevention</b></p> <p>Seniors housing should—</p> <p>(a) be designed in accordance with environmental design principles relating to crime prevention, and</p> <p>(b) provide personal property security for residents and visitors, and</p> <p>(c) encourage crime prevention by—</p> <p>(i) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of</p>	<p>The development has considered CPTED principles.</p> <p>There is a common accessway along the western side that has a security entry.</p>	<p>Complies.</p>

<p>public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and</p> <p>(ii) providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and</p> <p>(iii) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.</p>	<p>Areas for concealment are minimal. Casual surveillance is provided to all orientations.</p>	<p>Complies.</p>
<p><b>104 Accessibility</b></p> <p>Seniors housing should—</p> <p>(a) have obvious and safe pedestrian links from the site that provide access to transport services or local facilities, and</p> <p>(b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.</p>	<p>Lighting is provided along pathways and entries.</p> <p>Good sightlines are provided.</p> <p>Windows are provided adjacent to entry doors to allow sightline outside the door.</p>	<p>Complies.</p>
<p><b>105 Waste management</b></p> <p>Seniors housing should include waste facilities that maximise recycling by the provision of appropriate facilities.</p>	<p>Well signposted pedestrian and car entries are provided.</p>	<p>Complies.</p>
<p><b>108 Non-discretionary development standards for independent living units—the Act, s 4.15</b></p> <p>(1) The object of this section is to identify development standards for particular matters relating to development for the purposes of independent living units that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.</p>	<p>Provided.</p>	<p>Complies.</p>
<p>(2) The following are non-discretionary development standards in relation to development</p>	<p>Waste and recycling facilities are provided. Bins are near the street frontage in an enclosure.</p>	<p>Complies.</p>



<p>for the purposes of independent living units—</p> <p>(a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building,</p> <p>(b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m—</p> <p>(i) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and</p> <p>(ii) is limited to an area of no more than 20% of the surface area of the roof, and</p> <p>(iii) does not result in the building having a height of more than 11.5m,</p> <p>(c) the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,</p> <p>(d) for a development application made by a social housing provider—at least 35m<sup>2</sup> of landscaped area per dwelling,</p> <p>(e) if paragraph (d) does not apply—at least 30% of the site area is landscaped,</p> <p>(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,</p> <p>(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,</p> <p>(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—</p>	<p>The building height is up to 8.8m.</p> <p>N/A.</p> <p>FSR is 0.5:1.</p> <p>280m<sup>2</sup> of landscaping is provided, which exceeds the minimum requirement of 210m<sup>2</sup></p> <p>N/A as compiled above.</p> <p>Deep soil area is 257.3m<sup>2</sup> = 25% of site area.</p> <p>Deep soil area to the rear = 98.9m<sup>2</sup> = 38% of deep soil area.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>
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<p>(i) at least 15m<sup>2</sup> of private open space per dwelling, and</p> <p>(ii) at least 1 private open space with minimum dimensions of 3m accessible from a living area located on the ground floor,</p> <p>Note—</p> <p>The open space needs to be accessible only by a continuous accessible path of travel, within the meaning of AS 1428.1, if the dwelling itself is an accessible one—see Schedule 4, section 2.</p> <p>(i) for a dwelling in a multi-storey building not located on the ground floor—a balcony accessible from a living area with minimum dimensions of 2m and—</p> <p>(i) an area of at least 10m<sup>2</sup>, or</p> <p>(ii) for each dwelling containing 1 bedroom—an area of at least 6m<sup>2</sup>,</p> <p>(j) for a development application made by, or made by a person jointly with, a social housing provider—at least 1 parking space for every 5 dwellings,</p> <p>(k) if paragraph (j) does not apply—at least 0.5 parking spaces for each bedroom.</p>	<p>All dwellings receive 2hrs of direct solar access between 9am and 3pm at midwinter, except unit No.4 which receives 1 hour. Refer to solar access diagrams.</p> <p>Ground floor units have a minimum POS of 15.08m<sup>2</sup>. POS are well proportioned and usable. Where 3m dimension is not achieved good usable proportions are provided and the overall area requirement is achieved resulting in good amenity.</p> <p>The first floor units have a minimum POS area of 10.72m<sup>2</sup> with minimum dimensions of 2m.</p> <p>N/A.</p> <p>Complies. 3 spaces are provided.</p> <p>N/A.</p>	<p>Complies. 88% of units achieve compliance.</p> <p>Complies with the objective to provide good amenity. Usable outdoor areas are provided.</p> <p>Complies.</p> <p>Complies.</p>
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<b>Division 8 Seniors housing—Aboriginal Housing Office and Land and Housing Corporation</b>		
<p>108A Development to which Division applies</p> <p>This Division applies to development for the purposes of seniors housing involving the erection of a building on land—</p> <p>(a) on which development for the purposes of seniors housing is permitted with consent under another environmental planning instrument, or</p> <p>(b) in a prescribed zone or an equivalent land use zone.</p> <p>108B Seniors housing permitted without development consent</p> <p>(1) Development to which this Division applies may be carried out by or on behalf of a relevant authority without development consent if—</p> <p>(a) the relevant authority has considered the applicable development standards specified in sections 84(2)(c)(iii), 85, 88, 89 and 108, and</p> <p>(b) the development will not result in a building with a height of more than—</p> <p>(i) 9.5m, or</p> <p>(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</p> <p>(c) the seniors housing will not contain more than 40 dwellings on the site.</p> <p>(2) <a href="#">State Environmental Planning Policy (Transport and Infrastructure) 2021</a>, sections 2.15 and 2.17 apply to</p>	<p>The use is permitted with consent.</p> <p>The zoning is appropriate to the proposal.</p> <p>The development complies with the relevant standards.</p> <p>The building height is 8.8m.</p> <p>6 units are proposed.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p>



<p>(i) Good Design for Social Housing, published by the Land and Housing Corporation in September 2020, and</p> <p>(ii) the NSW Land and Housing Corporation Design Requirements, published by the Land and Housing Corporation in February 2023, and</p> <p>(f) consider the design principles set out in Division 6.</p> <p>(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.</p> <p>108D Exempt development Development for the 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.</p> <p>108E Subdivision of seniors housing not permitted Development consent must not be granted for the subdivision of seniors housing.</p>	<p>Noted.</p> <p>Subdivision is not proposed.</p>	<p>Complies.</p>
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#### Seniors Living Policy: Urban Design Guidelines for Infill Development

Clause/Requirement	Summary of proposal	Compliance/Non-Compliance
<p><b>Responding to Context</b></p> <p>Does the development contribute to the area?</p> <p>Is the development a good fit?</p> <p>Does the development address the street?</p> <p>Is the scale and massing appropriate?</p> <p><b>Site planning and Design</b></p>	<p>The form is appropriate, being two storeys in height and with a front setback that generally mimics that of adjoining sites. The development will address the street.</p> <p>The height and massing are appropriate.</p>	<p>Complies. The development will sit well within the low density context.</p> <p>Complies.</p> <p>Complies.</p>

Locate the bulk of development towards the front of the site to maximise the number of dwellings with frontage to the public street.	Given the width and proportions of the site, the development responds well to the site's proportions with 2 dwellings fronting the street.	Complies.
Parts of the development towards the rear of the site should be modest in scale to limit the impacts on adjoining properties.	The rear form is modest being 2 storeys and being well set back from the side and rear boundaries.	Complies.
Orientate dwellings to maximise solar access to living areas and private open space.	All living rooms and open spaces are orientated north, east or west and receive good solar access.	Complies.
Locate dwellings to buffer quiet areas within the development from noise.	Reasonable separation is provided between noise sensitive areas and open spaces and driveway.	Complies.
Retain trees and planting on the street and in front setbacks go stop the paragraph retain trees and planting at the rear to minimise impact on neighbours.	Neighbouring trees will not be impacted except potentially for Tree No.11 as identified in the Arborist report. Tree root mapping will be required and is included in the Identified recommendations as suggested by the Arborist.	Complies.
Retain large or significant trees.	All trees on the site will be removed. This is supported by the Arborist.	Complies.
Replaced trees with new mature or semi mature trees.	New trees provided, within the front and rear setbacks. 2 trees are provided within the front setback.	Complies.
Increased landscaping where appropriate.	An appropriate degree of planting is provided.	Complies.
Provide deep soil zones.	Deep soil planning is provided with the front and rear setbacks in particular, with additional planting in the side setbacks to	Complies.

<p><b>SEPP Controls</b></p> <p>Minimum site area 1000 square metres.</p> <p>Minimum site width 20 metres.</p> <p>The development cannot be refused if proposed buildings:</p> <ul style="list-style-type: none"> <li>- do not exceed 8 metres in height</li> <li>- the floor space ratio does not exceed 0.5:1.</li> <li>- the landscaped area has a minimum of 30% of the site</li> <li>- the deep soil area is a minimum 15% of the site</li> <li>- one visitor parking spaces provided for development of six or less dwellings.</li> </ul> <p>Additional site related requirements regarding access to services, bushfire prone land and water and sewerage are contained in clause 25 to 27 <b>(now clauses 93-96 in the Housing SEPP 2021)</b>.</p> <p><b>93 Location and access to facilities and services— independent living units</b></p> <p>(1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services—</p> <p>(a) by a transport service that complies with subsection (2), or</p> <p>(b) on-site.</p> <p>(2) The transport service must—</p>	<p>create a buffer with adjoining development.</p> <p>The site area is 1011.7m<sup>2</sup>.</p> <p>The site width is 20.1m.</p> <p>These are not prescriptive planning controls.</p> <p>The height is 8.8m.</p> <p>The FSR is 0.5:1.</p> <p>The landscaped area is 27.7%.</p> <p>The deep soil area is 25%.</p> <p>Not provided.</p> <p>The site is within an accessible area which is within 350m of bus stop ID 2270514 and bus stop 2270513 which is served by bus numbers 729/739, with greater frequency than the minimum required. The bus timetable and map showing proximity of the bus stops are provided with this submission.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Minor non-compliance.</p> <p>Complies.</p> <p>Not provided but acceptable.</p> <p>Complies.</p>
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<p>(a) take the residents to a place that has adequate access to facilities and services, and</p> <p>(b) for development on land within the Greater Sydney region—</p> <p>(i) not be an on-demand booking service for the transport of passengers for a fare, and</p> <p>(ii) be available both to and from the site at least once between 8am and 12pm each day and at least once between 12pm and 6pm each day, and</p> <p>(c) for development on land that is not within the Greater Sydney region—be available both to and from the site during daylight hours at least once each weekday.</p> <p>(3) For the purposes of subsections (1) and (2), access is adequate if—</p> <p>(a) the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and</p> <p>(b) the distance is accessible by means of a suitable access pathway, and</p> <p>(c) the gradient along the pathway complies with subsection (4)(c).</p> <p>(4) In subsection (3)—</p> <p>(a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and</p> <p>(b) the distance is to be measured by reference to the length of the pathway, and</p> <p>(c) the overall average gradient must be not more than 1:14 and the gradients along the pathway must be not more than—</p> <p>(i) 1:12 for a maximum length of 15m at a time, or</p>	<p>The bus goes to Mount Druitt and Blacktown centres.</p> <p>It is a public service, not on-demand.</p> <p>The frequency is greater than this minimum requirement.</p> <p>N/A.</p> <p>The bus stop is within 350m.</p> <p>The access is by level footpath.</p> <p>The pathway is generally flat. There are sections of the footpath that require upgrading to comply with gradient requirements. These requirements are included within the Identified Recommendations.</p> <p>Noted.</p> <p>Noted.</p> <p>The gradients are noted within the access report.</p>	<p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies.</p> <p>Complies following upgrade works.</p> <p>Complies.</p>
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<p>(ii) 1:10 for a maximum length of 5m at a time, or</p> <p>(iii) 1:8 for a maximum length of 1.5m at a time.</p>		
<p><b>95 Water and sewer</b></p> <p>(1) A consent authority must not consent to development under this Part unless the consent authority is satisfied the seniors housing will—</p> <p>(a) be connected to a reticulated water system, and</p> <p>(b) have adequate facilities for the removal or disposal of sewage</p>	<p>The site will be connected to water and sewerage services.</p>	<p>Complies.</p>
<p><b>96 Bush fire prone land</b></p> <p>(1) A consent authority must not consent to development under this Part on bush fire prone land unless the consent authority is satisfied the development complies with the requirements of Planning for Bushfire Protection.</p>	<p>The site is not noted as being bush fire prone.</p>	<p>Complies.</p>
<p><b>Impacts on Streetscape</b></p> <p>Design new do new development to be sympathetic to the existing streetscape terms of sighting height separation driveway locations pedestrian entries.</p>	<p>The 2 storey form is appropriate.</p>	<p>Complies.</p>
<p>Providing a front setback that relates to adjoining development.</p>	<p>The front setback complies with Council's DCP (6m) which will align with future development in the street.</p>	<p>Complies.</p>
<p>Reduce the physical bulk of development by breaking up building massing. Using variation in materials colours and openings. Using a roof pitch sympathetic to that of existing buildings in the street. Avoiding</p>	<p>The building is well articulated with changes in materials, openings, to break up the mass. The roof form is pitched. There are no large expanses of blank facades.</p>	<p>Complies.</p>

uninterrupted building facades including large areas of painted render.		
Provide open space in front setbacks.	Communal open space is provided in the front setback (and to the rear).	Complies.
Design dwellings at the front of the site to address the street.	The front 2 dwellings have openings to the street.	Complies.
Avoid long straight driveways.	The driveway is not long and is landscaped to its edges to break up its appearance.	Complies.
Provide some articulation, planting, altering driveway materials, to break up the appearance of the driveway.		Complies.
Screen parking from the street.	The parking is not readily visible from the street. 2 of the 3 spaces are completely screened.	Complies.
<b>Impacts on neighbours</b>		
Maintain neighbour's privacy by setting back from boundaries.	The form is setback 6m to the eastern neighbour and 3m from the western neighbour.	Complies.
Reduce visual bulk by breaking up into smaller elements.	Appropriate articulation is provided.	Complies.
Offset windows to neighbour's openings.	The degree of openings is modest. The first floor level balconies have a setback of 6m to neighbours.	Complies.
Use vegetation and mature planting to provide buffers to neighbours.	Some screen planning is provided along the side setbacks.	Complies.
Maintain solar access to neighbouring living areas and private open spaces.	Given the orientation, very good solar access is maintained.	Complies.
Design so not to directly overlook neighbouring living areas and private open spaces.	Good setbacks are provided. It is noted that there are existing trees along the western neighbour's boundary which	Complies.

<p>Provide new private open spaces away from noise sensitive areas.</p>	<p>obscure views from the balconies of Units 4 and 6 to the western neighbour's rear garden. Reasonable privacy is maintained. Noted.</p>	
<p>Provide planting and trees to driveways to provide a buffer to neighbours.</p>	<p>This has been provided. Refer to landscaping plan.</p>	<p>Complies.</p>
<p><b>Internal site amenity</b></p>		
<p>Design to maximise solar access to living areas and private open spaces.</p>	<p>All living areas and open spaces receive good solar access.</p>	<p>Complies.</p>
<p>Design dwelling entries so that they: Are clearly identifiable from the street or driveway.</p>	<p>Unit numbering will be signposted.</p>	<p>Complies.</p>
<p>Provide a buffer between communal and private dwellings.</p>	<p>Appropriate fencing is provided.</p>	<p>Complies.</p>
<p>Are orientated to not directly look into other dwellings.</p>	<p>Sufficient separation and orientation is provided.</p>	<p>Complies.</p>
<p><b>Parking, garaging and vehicular circulation:</b></p>		
<p>Locate noise sensitive areas away from driveways.</p>	<p>This is not a heavily used driveway with only 3 car spaces provided. Screens and planting are provided.</p>	<p>Complies with intent.</p>
<p>Provide screening to driveways.</p>		
<p>Provide landscaping screening to driveways.</p>		
<p><b>Residential amenity</b></p>		
<p>Provide distinct and separate pedestrian and vehicular circulation on the site.</p>	<p>Provided.</p>	<p>Complies.</p>
<p>Minimising opportunities for concealment.</p>	<p>Limited opportunities for concealment are provided.</p>	
	<p>Well-proportioned open spaces are provided.</p>	<p>Complies.</p>

Provide private open space that is generous in proportion and adjacent to the main areas living areas of the dwelling.	Provided.	Complies.
Is orientated predominantly North East or West.	One space per dwelling is provided.	Complies.
Comprises multiple spaces for larger dwellings.	Screening is provided. The open spaces between ground and first floor units are separated to allow for privacy.	Complies.
Uses screening for privacy but also allows for casual surveillance.		Complies.
Provide communal open space that is clearly accessible to all residents and easy to maintain. Includes shared facilities such as seating or barbecues.	Communal open spaces are provided in the front and rear setbacks.	Complies.

### Aboriginal Housing Office Design Guidelines NSW 2020

Clause/Requirement	Summary of proposal	Compliance/Non-Compliance
<b>D Siting Principles</b>		
Minimise cut and Fill.	Minimal cut and fill required because the site is flat.	Complies.
Maintain existing topography.	Topography is maintained.	Complies.
Shade west facing windows and walls if necessary.	Appropriate shading is provided to openings facing west, east and north, in order to optimise thermal performance.	Complies.
Maximise north facing living areas.	All dwellings have some openings to the north.  This is unavoidable on a narrow site.	Complies.
Avoid west facing bedrooms.		Complies.

Maximise airflow through homes.	Cross ventilation is provided throughout.	Complies.
Provide appropriate building separation to maintain privacy.	Good separation is provided. Open spaces are separated. Living rooms do not look on to neighbours.	Complies.
Offset windows to maintain privacy.	Windows are offset and sufficiently separated.	Complies.
Ensure good drainage away from buildings.	Good drainage is provided.	Complies.
Use sediment control devices.	Will be provided during construction.	Complies.
Cover stockpiles of materials to prevent runoff.	Will be provided during construction.	Complies.
Separate pedestrian and vehicle entries.	Provided.	Complies.
Parking dimensions min 3.2m x 5.4m. Driveway crossover clear of trees by min. 1.5m.	Provided.	Complies.
Habitable rooms to address the street.	Front 2 dwellings have windows that face the street.	Complies.
Detailing to the front of sites, landscaping to front setback, low front fences.	Landscaping, low fences provided.	Complies.
Security screens provided to windows and doors.	Provided.	Complies.
Security view to entry door.	Windows provided adjacent to entry.	Complies.
Adequate external lighting provided.	Lighting provided with Lux 20 minimum.	Complies.
<b>E. Building Envelope Principles</b>		

Use conventional roof forms.	Pitches provided.	Complies.
Avoid multiple changes in materials in facades.	Brick and metal sheeting is provided.	Complies.
Use prefinished materials to reduce maintenance costs.	Exposed brick used.	Complies.
Habitable room windows to face the street.	Provided.	Complies.
Pitched roofs are acceptable.	Noted.	Complies.
Insulate roofs.	Insulation provided as per NATHERS.	Complies.
Provide eaves.	Eave shading provided.	Complies.
Provide landscape screening.	Landscape provided to screen and improve amenity.	Complies.
Room layout should assist with privacy.	Layout is appropriate.	Complies.
Outdoor living to not open to the street.	Outdoor living spaces designed away from the street.	Complies.
Provide cross ventilation.	Provided throughout.	Complies.
Where single aspect ventilation room length max 2.5 x that of height of room. Where dual aspect ventilation room length max 5 x that of height of room.	No single aspect living rooms provided. Single aspect rooms are small in depth.	Complies.
Minimum 5 star NATHERS required.	Min. 5 star provided.	Complies.
Limit number of material changes.	Changes in material are appropriate.	Complies.
Locate most glazing to north if feasible and provide overhangs.	Provided.	Complies.
Avoid overuse of glazing.	Ratio of solid to void is appropriate.	Complies.
	Noted.	Complies.

<p>Allow dwellings to be adapted to be used by families, people with a disability and seniors.</p> <p>Corridors 1200mm wide.</p> <p>Clearance of 1200mm to foot of bed and 1000mm to sides.</p>	<p>Provided.</p> <p>Provided.</p>	<p>Complies.</p> <p>Complies.</p>
<b>F. External Design Principles</b>		
Letterbox adjacent to main entry.	Provided adjacent to entry.	Complies.
The outdoor area should have some cover.	Shading provided.	Complies.
Front fence 900mm high.	Provided.	Complies.
Side and rear fence 1800mm high.	Provided.	Complies.
<b>G. Internal Design principles</b>		
All rooms to have operable windows.	All rooms have openable windows.	Complies.
Internal door to at least 1 bedroom to have an opening of 850mm.	Min. 850mm provided.	Complies.
Bedroom min dimension 3m clear of wardrobes.	Min dimension is 3m.	Complies.
Wardrobes with sufficient space.	All bedrooms have BIRs.	Complies.
Kitchen bench depth 750mm-900mm Provide generous internal space and proportions.	Bench is 750mm.	Complies.
Provide connection between main living space and outdoor area.	Provided.	Complies.
Design principles for bathrooms, showers 800mm x 800mm internally, mirrored cabinets, vanities on stainless steel legs, bath min. 1600m long x 750mm wide by 380mm deep.	Provided in all units.	Complies.

Design principles for laundries, bench separate to sink, space for washing machine, storage space.	Provided with all.	Complies.
Provide a linen cupboard.	All units have a linen cupboard.	Complies.
Use low maintenance materials.	Noted.	
Floor to ceiling height to be 2700mm to habitable spaces and 2400mm to non-habitable areas.	2700mm provided.	Complies.

### Other SEPPS/SREPS for Consideration

Environmental Assessment – Other legislation and considerations as noted under Clause 171 (2) of the Environmental Planning and Assessment Regulation Act, are addressed below.

Consideration	Summary of proposal	Compliance/Non-Compliance
<b>Soils and geology</b>		
Will the works require excavation? Depending on the area of ground that will be disturbed an Erosion and Sediment Control Plan or a Soil and Water Management Plan may be required during construction.	Some minor excavation will occur with the works, particularly around the perimeter of the works. No significant cut or fill is required (as shown on submitted drawings). Whilst some very minor fill is required, this degree of fill and excavation is typical.	Complies/No further action is required.
Are the works within a landslip area?	No.	Complies/No further action is required.
Are the works within an area of high erosion potential?	No.	Complies/No further action is required.
Could the works disturb any natural cliff features, rock outcrops or rock shelves?	No.	Complies/No further action is required.
Will the works result in permanent changes to surface slope or topography?	No.	Complies/No further action is required.



<p>Are there acid sulphate soils within or immediately adjacent to the boundaries of the work area? And could the works result in the disturbance of acid sulphate soils?</p> <p>Are the works within an area affected by salinity?</p> <p>Is there potential for the works to encounter any contaminated material?</p>	<p>The site is not noted as being potentially Acid Sulphate soil affected.</p> <p>No.</p> <p>Unlikely. Soil testing has not identified any existing contaminations.</p>	<p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p>
<p><b>Hydrology, flooding and water quality</b></p> <p>Are the works located on the bank of a natural watercourse?</p> <p>Do the works involve a creek crossing? Are the works located within a floodplain?</p> <p>Does the proposal involve the diversion of a creek?</p> <p>Will the works intercept groundwater?</p> <p>Will a licence under the Water Act 1912 or the Water Management Act 2000 be required?</p> <p>Will a Controlled Activity Approval be required?</p> <p>Could the works impact upon a water catchment area?</p> <p>Do any of the work areas drain directly to areas within the Hunter Water special areas?</p>	<p>The site is not noted as being within a 'Flood Planning Area' under Council's LEP.</p> <p>No.</p> <p>No.</p> <p>No.</p> <p>No.</p> <p>No.</p> <p>No.</p> <p>No.</p>	<p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/Licence can be applied for if required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p>

Could the works result in a discharge/overflow of sewage?	No.	Complies/No further action is required.
Will pipe flushing activities result in potable water being discharged to a waterway?	No.	Complies/No further action is required.
<b>Ecology</b>		
Could the works affect any Environment Protection and Biodiversity Conservation Act 1999) listed threatened species, ecological community or migratory species?	The works do not affect any threatened species, ecological community or migratory species.	Complies/No further action is required.
Could the works affect any Biodiversity Conservation Act 2016 listed threatened species, populations or ecological communities?	No significant vegetation will be removed or affected.	Complies/No further action is required.
Could the works affect a National Park or reserve administered by the Office of Environment and Heritage?	No ecologically sensitive place is affected by the works. The works have no impact in this regard.	Complies/No further action is required.
Is there any important vegetation or habitat within or adjacent to the work area? Could the works impact on any aquatic flora or habitat (i.e. seagrasses, mangroves)? Are there any noxious or environmental weeds present within the work area? Will clearing of native vegetation be required?	No.  Minimal clearing of insignificant vegetation will occur.	Complies/No further action is required.  Complies/No further action is required.
<b>Noise and vibration</b>		
Are there residential properties or other sensitive land uses or areas that may be affected by noise from the proposal during construction? (i.e. schools, nursing homes, residential areas or native fauna populations)?	Residential dwellings surround the site. It is unlikely that these residences will be unreasonably affected by the work because of the separation distance and temporary timeframe required for the works.	Complies/No further action is required.
Will any receivers be affected by noise for greater than three weeks?	Building work will occur for approximately 12 months in	

<p>Are there sensitive land uses or areas that may be affected by noise from the proposal during operation?</p> <p>Will the works be undertaken during standard working hours? Monday – Friday: 7am to 6pm Saturday: 8am to 1pm Sunday and public holidays: no work</p> <p>Will the works result in vibration being experienced by any surrounding properties or infrastructure?</p>	<p>total and will occur within typical working hours, 7am - 6pm Monday to Friday and 7am -1pm Saturday. No work will occur on Sunday or Public Holiday.</p> <p>Besides the residential use there are no other sensitive land uses. Impacts to residents are considered reasonable.</p> <p>The works should be undertaken within these hours.</p> <p>No significant or unreasonable level of vibration is expected.</p>	<p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>The works should occur within these hours in order to ensure there are no unreasonable noise impacts.</p> <p>Complies/No further action is required.</p>
<p><b>Air quality and energy</b></p> <p>Could the works result in dust generation?</p> <p>Could the works generate odours (during construction or operation)?</p> <p>Will the works involve the use of fuel-driven heavy machinery or equipment?</p> <p>Are the works located in an area or adjacent to land uses that may be</p>	<p>There would be very minor dust generation from the site preparation and construction phases. The dust generation is not significant and would unlikely materially affect the closest residents or the amenities of the area.</p> <p>No.</p> <p>Some machinery is necessary. Given the scope of works it is unlikely that the use of heavy equipment will be significant.</p> <p>No.</p>	<p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p>





	received in the event there is a need to close or conduct works over a public road.	
<b>Land uses and services</b>  Will the works result in a loss of or permanent disruption of an existing land use?  Will the works involve the installation of structures or services that may be perceived as objectionable or nuisance?  Will the works involve the disturbance or removal of asbestos?  Is the work site located on land that is known to be or is potentially contaminated?  Will the works impact on or be in the vicinity of other services?	The works will safeguard and improve the existing land use.  No. The works are beneficial to the wider community.  Potentially.  There is no history of soil contamination.  A new sewer line is not required.	Complies/No further action is required.  Complies/No further action is required.  Asbestos removal is required if it is found.  Complies/No further action is required.  If services are located during works appropriate action will be taken.
<b>Waste generation</b> <b>Waste Avoidance and Resource Recovery Act 2001</b>  Will works result in the generation of non-hazardous waste?  Will the works result in the generation of hazardous waste?  Will the works result in the generation of wastewater requiring offsite disposal?	Minimal non-hazardous waste will be generated. The proposed activity will generate waste and is required to consider the waste management hierarchy. It is not expected that hazardous waste be found at the site given the prior testing.  No.	Complies/No further action is required.  Complies/No further action is required.  Complies/No further action is required.

It is also prudent to ensure that the proposed works generally comply with Council's most relevant planning controls that relate to the proposed works. The most relevant aspects of Blacktown Local Environmental Plan 2015 and Blacktown Development Control Plan are addressed below.

#### Blacktown LEP 2015 – Relevant Clauses

Clause/Requirement	Summary of proposal	Compliance/Non-Compliance
<b>Zoning</b>	R2 Low Density Residential  This zone allows a variety of uses including Seniors Housing.	Complies.
<b>Floor Space Ratio</b>	N/A.	
<b>Height of Buildings Building Height Limit = 9m</b>	Building height is 8.8m.	Complies. The Housing SEPP 9.5m height overrides this control.
<b>Heritage</b>	The site is not heritage affected. There are no heritage sensitive places near the site.	Complies.
<b>Design Excellence</b>	The development exhibits design excellence in providing high levels of amenity for the occupants and maintaining amenity for neighbours.	Complies.

#### Blacktown DCP – Relevant Clauses

Clause/Requirement	Summary of proposal	Compliance/Non-Compliance
<b>Part A General 6. Parking</b> There is no parking rate for this type of use.	Refer to Traffic Report is provided. The report advises that existing on street parking availability will satisfy parking demand for the use.	Complies/No further action is required.
<b>8 Crime Prevention Through Environmental Design CPTED</b>	The proposal is consistent with the principles of CPTED. Areas for concealment are minimal,	Complies/No further action is required.

<p><b>Part 3</b> <b>Development in Residential Areas</b></p> <p><b>7 Seniors Housing</b></p> <p><b>Compliance with relevant section of the DCP for the type of development e.g. multi dwelling housing or attached dwelling</b></p> <p><b>Part G</b> <b>Site Waste and Minimisation</b></p>	<p>clear sightlines are provided. The structures and their use will increase casual surveillance within the immediate area.</p> <p>Compliance with the development standards in the SEEP.</p> <p>There is no directly relevant type of development that this form of development is described by.</p> <p>A waste management plan will be provided with the submission demonstrating how waste will be minimised during the construction phase and during the ongoing use of the property.</p>	<p>Addressed above. Complies/No further action is required.</p> <p>Complies/No further action is required.</p> <p>Complies/No further action is required.</p>
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### Summary

- The proposed works fall within the scope of works permitted under Clauses 108AA-108E of the State Environmental Planning Policy (Housing). As such AHO may assess the proposal using this REF and other submitted information, as to whether the works have minimal and reasonable environmental impacts.
- Following an appraisal of the works against the relevant legislation, it is considered that the works have minimal environmental impacts.
- The following mitigation measures and recommendations should be considered for the proposal.