

12 November 2020

council@campbelltown.nsw.gov.au

Attn: Emma Page
Senior Development Planner
Campbelltown City Council
PO BOX 57
CAMPBELLTOWN NSW 2560

Dear Emma,

RE: Request for Additional Information – 1227/2019/DA-M– 12-16 Francis St & 121 Minto Rd, Minto

This letter has been prepared on behalf of the applicant, Urban link Architects and responds to an additional information request received 9 June 2020 for **1227/2019/DA-M**. The DA in question proposes the demolition of existing dwellings and construction of a multi-dwelling housing development consisting of 23 dwellings and basement carparking under the provisions of State Environmental Planning Policy (Affordable Rental Housing) 2009 at 12-16 Francis St & 121 Minto Rd, Minto. The request outlined additional information required to progress the determination of the DA.

This letter provides details on the amended design and provides a response to the issues raised in Council's request for additional information and should be read in conjunction with the following amended documentation:

- Amended Architectural Plans;
- Amended Landscape Plans;
- Further Waste Management Report;
- Amended Stormwater Plans;

- Traffic Response; and
- Contamination Response.

A response to each issue raised by Council is provided below.

1.0 Affordable Rental Housing

1. *The specific units to be used for affordable housing are to be nominated on the plans and within the revised Statement of Environmental Effects. The floor area of the units determines the FSR for the development. In the revised submission, ensure a statement regarding clause 13 of SEPP (Affordable Rental Housing) is provided.*

Comment

A total of 9 units (Units 13-16 and Units 18-23) are proposed to be used for affordable rental housing under the provisions of State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP). The units are clearly identified within the Amended Architectural Plans prepared by Urbanlink provided as an attachment to this letter.

In line with Clause 13 of the ARH SEPP the Floor Space Ratio bonus for the proposed development is based on the percentage of the development to be used for the purposes of affordable rental housing. A total of 41.49% (1,247m²) of the gross floor area (GFA) is to be used for the purposes of affordable rental housing and therefore a bonus FSR of 0.41:1 is afforded to the development.

Based on the applicable FSR control for the development at the time of lodgement under the Campbelltown Local Environmental Plan (LEP) 2015 of 0.45:1 for multi dwelling housing in the R2 zone the maximum allowable FSR for the proposed development is 0.86:1. The proposed development has a total FSR of 3,005m² / 4,106m² = 0.73:1 which complies with the maximum FSR of 0.86:1.

2. *The 'bonus' FSR is incorrectly calculated on Drawing No. 6001. The cover letter provided indicates that 5 units are to be affordable housing, not all units as previously indicated. Provide an amended plan to reflect the correct bonus calculation, as less than 50 per cent of the gross floor area of the development is to be used for affordable housing.*

Comment

The bonus FSR afforded under the ARH SEPP has been updated and is correctly identified within the Amended Architectural Plans provided as an attachment to this letter.

2.0 Clause 16A of State Environmental Planning Policy (Affordable Rental Housing) 2009

3. *The surrounding development is characterised by detached dwellings, most single storey, with pitched roofs and a large amount of private open space located in the rear of the dwellings. The proposed*

development includes four large buildings, for the full length of the individual blocks, with no open space in the rear of the allotments. The proposed development does not appear to be in harmony with the adjoining low density residential development or character of the surrounding area.

Comment

The proposed development has been designed with regard to Clause 16A of the ARH SEPP ensure the development is compatible with the character of the local area.

The development has been orientated and designed to be compatible with and complement the existing low-density residential character of the area. Due to the site's shape and depth the development has been designed to present to the Francis Street and Minto Road frontages as two storey single dwellings that are reflective of the desired low-density residential nature of the area and do not adversely impact adjoining properties. The proposed development has been designed to sit well within the maximum building height and the apparent bulk of the development is not readily apparent from the streetscape and has been appropriately setback and landscaped to ensure it does not impact the adjoining residential properties.

The development has been sited and designed to provide a consistent built form within a landscaped setting that integrates the development into the surrounding locality. The development allows for large landscaped setbacks and private open space areas that afford the development and surrounding properties with a high level of residential amenity and ensure appropriate softening and screening of the bulk of the development from adjoining properties.

In addition, car parking has been provided in a basement level to reduce the scale and intensity of the development and avoid large expanses of impervious surfaces or garage dominance on the street frontage.

Streetscape Perspectives that include the adjoining properties are currently being prepared to provide a detailed streetscape analysis that demonstrates how the proposed development is compatible with the low-density residential character of the area. The Streetscape Perspectives will be provided under separate cover.

4. *The response provided to Clause 16A does not include an assessment of the existing streetscape character and elements that contribute to this character.*

Comment

The existing streetscape character of both Francis Street and Minto Road comprises single and double storey detached dwellings with large landscaped front setbacks. The dwellings are characterised by a range of roof forms with windows and dwelling entrances addressing the streetscape.

The development has been orientated and designed to be compatible with and complement the existing low-density residential character of the area. Due to the site's shape and depth the development has been designed to present to the Francis Street and Minto Road frontages as two storey single dwellings that are

reflective of the desired low-density residential nature of the area and do not adversely impact adjoining properties. The proposed development provides windows and entrances fronting the street consistent with the existing streetscape.

The development has been sited and designed to provide a consistent built form within a landscaped setting that integrates the development into the surrounding locality. The development allows for large landscaped setbacks and private open space areas that afford the development and surrounding properties with a high level of residential amenity and ensure appropriate softening and screening of the bulk of the development from adjoining properties.

Streetscape Perspectives that include the adjoining properties are currently being prepared to provide a detailed streetscape analysis that demonstrates how the proposed development is compatible with the low-density residential character of the area. The Streetscape Perspectives will be provided under separate cover.

5. *Photomontages are required to be provided at different points along both Francis Street and Minto Road which include the development within the existing streetscape.*

Comment

Streetscape Perspectives that include the adjoining properties are currently being prepared to provide a detailed streetscape analysis that demonstrates how the proposed development is compatible with the low-density residential character of the area. The Streetscape Perspectives will be provided under separate cover.

3.0 Clause 10(2) of State Environmental Planning Policy (Affordable Rental Housing) 2009

6. *In response to the above, “accessible area” means land this is within –*

(c) 400 metres walking distance of a bus stop used by a regular bus service (within the meaning of the Passenger Transport Act 1990) that has at least one bus per hour servicing the bus stop between 06.00 and 21.00 each day from Monday to Friday (both days inclusive) and between 08.00 and 18.00 on each Saturday and Sunday.

Provide timetables as an appendix demonstrating that the services are at least every hour in accordance with Clause 10(2) of SEPP (Affordable Rental Housing). Ensure it is noted how many buses provide an accessible service.

Comment

The bus stops located on Minto Road are serviced by Routes 870, 871 and 872 which provide regular services between Liverpool and Campbelltown. As detailed in the Bus timetables provided as an

attachment to this letter routes 870, 871 and 872 provide a service at least every hour between 6am and 9pm Monday to Friday and 8am and 6pm Saturday and Sundays.

As detailed in the bus timetables every service provided to Minto Road near Ohlfsen Road (Stop ID: 2566145 & 2566411) by routes 870, 871 and 872 is an accessible service.

7. *In order to demonstrate that pedestrians can safely walk to the nominated bus stops, a road safety engineer must review the existing pedestrian facilities on route to and from the nominated bus stops with the new of improving crossing points and further pedestrian infrastructure. This will require the assessment of existing footpath and crossing points of Minto Road, Burford Street and Ohlfsen Road and must include the following:*

- *the needs of senior residents and pedestrians with vision impairment and other mobility issues.*
- *take into account pedestrian/ vehicle conflicts and traffic turning movements at the intersections of Burford Street and Minto Road, and Ohlfsen Road and Minto Road.*
- *intersection performance analysis is required with the view of determining whether the intersections can be upgraded to traffic signals. Notwithstanding, the applicant is to explore the option of pedestrian crossing signals at a suitable location.*

Comment

It is understood that Minto Road is identified for road widening and upgrades in the future. The road widening and upgrades will include upgrades to the existing pedestrian infrastructure and bus stops along Minto Road and will improve accessibility to and from the subject development.

The current condition of the pedestrian infrastructure along Minto Road will require upgrades between Burford Street and the identified bus stops to achieve the required accessibility as detailed in the Amended Architectural Plans and Traffic Response provided as attachments to this letter. The applicant is happy to provide temporary upgrades to the pedestrian infrastructure to support the proposal until such time Minto Road is widened. This is considered to be reasonable and can be suitably conditioned.

In addition, Varga Traffic has undertaken an analysis of the Minto Road intersections with Burford Road and Ohlfsen Road and concludes that it is unlikely that the level of traffic activity at those intersections would meet the RMS warrants for traffic signals in any event, and it is therefore proposed that pedestrian refuge islands be provided in both Burford Street and in Ohlfsen Road to assist pedestrians when crossing the road. It is considered that if any upgrades are required to the existing road network these will be undertaken through the future widening and upgrade of Minto Road.

8. *The levels of the proposed pedestrian infrastructure (i.e. footpaths) are to be provided. Any traffic facilities proposed on Minto Road would require RMS approval and would be referred to the RMS for review.*

Comment

It is understood that Minto Road is identified for road widening and upgrades in the future. The road widening and upgrades will include upgrades to the existing pedestrian infrastructure and bus stops along Minto Road and will improve accessibility to and from the subject development.

The current condition of the pedestrian infrastructure along Minto Road will require upgrades between Burford Street and the identified bus stops to achieve the required accessibility as detailed in the Amended Architectural Plans and Traffic Response provided as attachments to this letter. The applicant is happy to provide temporary upgrades to the pedestrian infrastructure to support the proposal until such time Minto Road is widened. This is considered to be reasonable and can be suitably conditioned.

4.0 Emergency Evacuation Situation

- 9.** The subject site is contained within a suburban area that contains one combined ingress/egress from Burford Street onto Minto Road. The wider residential area is mapped as bushfire prone lands. Provide an assessment on whether the egress of the neighbourhood is compromised in relation to emergency evacuation situations.

Comment

The subject site is not identified as being bushfire prone land and adequate vehicular access has been provided to the subject site. Given that the site is not identified as being bushfire prone land it is not considered to impede on the ingress and egress of surrounding properties in the event of an emergency.

- 10.** Detail emergency services access for the proposed development.

Comment

The emergency service access for the proposed development is to be provided via the vehicular access to the site from Francis Street. A dedicated Emergency Service vehicle space is provided within the basement level as detailed in the Amended Architectural Plans provided as an attachment to this letter.

5.0 Clause 15 – Seniors Living Policy: Urban Design Guidelines for Infill Development

- 11.** As requested by the Planning Panel, provide an assessment of the development against Senior Living Policy: Urban Design Guidelines for Infill Development as required by clause 15 of State Environmental Planning Policy (Affordable Rental Housing).

Comment

The proposed development has been designed with consideration of the Seniors Living Policy: Urban Design Guidelines for Infill Development in accordance with Clause 15 of the ARH SEPP. The Seniors Living Policy: Urban Design Guidelines for Infill Development provides guidance for general design of senior's

housing development and was prepared to supplement State Environmental Planning Policy (Seniors Living) 2004. Under Clause 15(1) of the ARH SEPP the consent authority is required to consider the relevant provisions of the policy. The proposed development has been designed with consideration of the policy where the provisions are consistent with the ARH SEPP.

An assessment of the proposed development against the key design principles of the policy is provided below:

1. Responding to Context

The development has been orientated and designed to be compatible with and complement the existing low-density residential character of the area. Due to the site's shape and depth the development has been designed to present to the Francis Street and Minto Road frontages as two storey single dwellings that are reflective of the desired low-density residential nature of the area and do not adversely impact adjoining properties. The proposed development has been designed to sit well within the maximum building height and the apparent bulk of the development is not readily apparent from the streetscape and has been appropriately setback and landscaped to ensure it does not impact the adjoining residential properties.

The development has been sited and designed to provide a consistent built form within a landscaped setting that integrates the development into the surrounding locality. The development allows for large landscaped setbacks and private open space areas that afford the development and surrounding properties with a high level of residential amenity and ensure appropriate softening and screening of the bulk of the development from adjoining properties.

In addition, car parking has been provided in a basement level to reduce the scale and intensity of the development and avoid large expanses of impervious surfaces or garage dominance on the street frontage.

2. Site Planning and Design

The proposed development has been designed to best respond to the existing site context, minimise impacts on surrounding development and provide a high level of amenity for the development. This has been achieved through the siting and design of the proposal to appropriately address the site's two street frontages, the protection and retention of existing landscaping where possible and the provision of car parking in a basement level to reduce the scale and intensity of the development and avoid large expanses of impervious surfaces or garage dominance on the street frontage.

3. Impacts on Streetscape

The existing streetscape character of both Francis Street and Minto Road comprises single and double storey detached dwellings with large landscaped front setbacks. The dwellings are characterised by a range of roof forms with windows and dwelling entrances addressing the streetscape.

The development has been orientated and designed to be compatible with and complement the existing low-density residential character of the area. Due to the site's shape and depth the development has been designed to present to the Francis Street and Minto Road frontages as two storey single dwellings that are reflective of the desired low-density residential nature of the area and do not adversely impact adjoining properties. The proposed development provides windows and entrances fronting the street consistent with the existing streetscape.

The development has been sited and designed to provide a consistent built form within a landscaped setting that integrates the development into the surrounding locality. The development allows for large landscaped setbacks and private open space areas that afford the development and surrounding properties with a high level of residential amenity and ensure appropriate softening and screening of the bulk of the development from adjoining properties.

4. Impacts on Neighbours

The proposed development has been designed to ensure impacts on adjoining properties are minimised and an appropriate level of residential amenity is maintained. This has been achieved through the siting and design of the development to ensure opportunities for overlooking are minimised and an appropriate level of acoustic privacy is maintained. This has been achieved through the appropriate siting and design of private open space areas, communal areas and the windows and openings of the dwellings. The proposed dwellings will also be constructed best manage and minimise the acoustic impact of the proposal.

Extensive landscaping is proposed within the front and side setback areas to provide a high level of amenity for the development and provide appropriate screening that will provide visual interest and amenity for the wider area.

A detailed Shadow Analysis is provided in the Amended Architectural Plans that demonstrates the proposed development does not adversely impact on the solar access to the private open space and living areas of adjoining properties.

5. Internal Site Amenity

Internal site amenity was a key consideration in the design of the proposal. The proposed development is provided with a high level of residential amenity through the provision of well-designed communal areas, provision of large landscaped private open space areas, a high level of visual and acoustic privacy and provision of appropriate solar access to private and communal areas.

In addition, the proposed development was designed in accordance with the Crime Prevention Through Environmental Design (CPTED) principles and incorporates a number of crime prevention measures such as:

- The building and associated landscaping provide for high levels of natural surveillance;

- The introduction of the proposed development will promote enhanced neighbourhood security and safety through the presence of new development and activity within the site that addresses both street frontages;
- The design of the development delivers an activated streetscape on all frontages, reducing likelihood of anti-social behaviour;
- The building and associated landscaping clearly delineate between public and private spaces; and
- An appropriate maintenance and management regime will be implemented for the building and streetscape areas.

It is noted that in accordance with Clause 15 of the ARH SEPP the consent authority must take into consideration the provisions of the Seniors Living Policy: Urban Design Guidelines for Infill Development and therefore shall undertake their own assessment.

6.0 State Environmental Planning Policy 55 – Remediation of Land

12. A revised preliminary contaminated site assessment is to be provided addressing the following information gaps in the EI Australia report (No. E24391.E01) dated 23/10/19:

- a. A NSW SafeWork authority search
- b. The Title History of the subject lots
- c. The information from the enquiries to Council
- d. Local Knowledge from the current and readily available previous owners (if any)

Comment

A Contamination Response has been prepared by ei Australia and is provided as an attachment to this letter. The response addresses each of Council's concerns raised with the previous Preliminary Site Investigation.

7.0 State Environmental Planning Policy (Sydney Region Growth Centres) 2006

13. The subject site is identified within the Greater Macarthur Growth Area. Accordingly, address the relevant clauses in State Environmental Planning Policy (Sydney Region Growth Centres) 2006.

Comment

The subject is located approximately 120m to the east of the Minto Precinct as identified in the Minto Precinct Plan of the Greater Macarthur Growth Area. The site is therefore not located within the Greater Macarthur Growth Area and there are no relevant clauses in State Environmental Planning Policy (Sydney Region Growth Centres) 2006 to be addressed.

8.0 Waste Management

14. *Despite the relocation of the bin storage area, there is an excessive travel distance between the bin storage area and a number of proposed units. In some cases, this distance is approximately 90m (in the case of unit 13). Eleven units in total exceed the maximum travel distance of 40m, as specified in Part 3.6.6.9 (h) of Council's (Sustainable City) Development Control Plan 2015. This excessive non-compliance is not supported.*

Comment

A Further Waste Management Report has been prepared by Dickens Solutions in response to the issues raised by Council and is provided as an attachment to this letter. A detailed response on the travel distances is provided in the Further Waste Management Report

15. *The bin storage area is located further than the maximum distance of 25m from the collection point. The caretaker responsible for the presentation of the bins to the street would be required to wheel the bins (individually given the width of the access path) from the basement storage area up through the bin lift and then travel approximately 65 metres to Francis Street and approximately 63 metres to Minto Road. This distance is excessive and exceeds the maximum distance of 25m as stipulated in Council's (Sustainable City) Development Control Plan 2015.*

Comment

A detailed response on the travel distances to the collection points is provided in the Further Waste Management Report provided as an attachment to this letter.

16. *There is concern in relation to the width of the footpaths provided, as they will need to accommodate foot traffic from residents entering and exiting the development, as well as the caretaker presenting and retrieving bins each week. The lack of setback between the footpaths and building frontages within the development provides little room for manoeuvring and passing of pedestrians while bins are being wheeled through the development. Adequate clearance is to be provided to allow for both pedestrian access and caretaker access while presenting and retrieving bins.*

Comment

The proposed footpaths have been amended to ensure they are designed and will be constructed in line with Council's specifications. The footpaths are deemed to be appropriate to accommodate foot traffic and the caretaker presenting and retrieving bins from the collection points.

The caretaker will present the bins to the relevant collection points in advance of the trucks arriving which will be undertaken at times there is minimal foot traffic within the site. The retrieval of bins will be undertaken by the caretaker who will appropriately collect the bins and return them to the storage areas

and will exercise vigilance to minimise conflict between other foot traffic within the site. The proposed arrangement is not deemed to cause undue negative impacts on residents and will be undertaken in an appropriate manner.

9.0 Development Engineering

17. *Council requires information to justify that the overland flow paths proposed in the stormwater plan would not impact on the adjacent units. Finished ground levels shall be provided on the architectural plans and stormwater plan addressing the freeboard requirement specified in Cl. 4.5 of Council's Engineering Design for Development guide.*

Comment

Amended Stormwater Plans have been prepared by SGC Engineering Value in response to the issues raised by Council and are provided as an attachment to this letter.

18. *The driveway gradients shall be redesigned to comply with the gradients and the change of gradient as specified in AS 2890.1. A driveway longitudinal section between the gutter invert in Francis Street and the basement entrance at the critical driveway location shall be provided in accordance with the Council and AS 2890.1 requirements. The gradients of the road verge (between gutter invert to site front boundary) shall be in accordance with the gradients specified in the Council standard drawing SD-R08.*

Comment

The design of the driveway has been amended to ensure compliance with the relevant standards and specifications as detailed in the Amended Architectural Plans and Traffic Response provided as attachments to this letter.

19. *Swept path diagram shows clearance lines of some of the swept paths encroach the adjacent wall/garage door due to the insufficient apron width. It is required to increase either apron width or garage door width to comply with the Cl. 5.4 of AS 2890.1.*

Swept paths for Unit 13 parking space has not been provided and some of the clearance line of parking spaces encroach the adjacent parking space. It is recommended to provide the swept path of entering and exiting parking spaces in different colours with legend for clarity. Colour coded swept paths shall be provided for all parking spaces especially for critical spaces. All the clearance lines should contain within the relevant parking space.

Comment

Updated Swept Path Diagrams have been prepared by Varga Traffic Planning in support of the proposal and are provided in the Traffic Response provided as an attachment to this letter.

10.0 Rear Access and Maintenance

20. *Areas required to satisfy deep soil landscaping cannot be treated as 'low maintenance' areas. The private open space areas of the dwellings listed below are required to achieve the deep soil planting zone requirement of State Environmental Planning Policy (Affordable Rental Housing). Landscaping maintenance of the rear private open space areas cannot be achieved without moving through the habitable areas of the dwellings which is not supported. Separate direct access must be provided for the following proposed dwellings:*

- Units 1–6 inclusive
- Unit 12
- Units 13 and 17
- Units 18 – 23 inclusive

Comment

Rear access has been provided for units 1, 6, 7, 12, 13, 18 and 23. Due to the proposed configuration and landscaped areas provided the remaining units have not been provided with a separate and direct access from the backyard to the front of the dwelling. Minimal lawn maintenance will be required for the rear courtyards of the dwellings and to maintain a consistent and safe built form the rear accessways have therefore not been provided.

11.0 Deep Soil Area

21. Provide plans demonstrating which areas have been included in the deep soil calculations.

Comment

A Plan demonstrating all areas included in the Deep Soil calculations has been provided in the Amended Architectural Plans provided as an attachment to this letter.

12.0 Landscaped Area

22. *Provide plans demonstrating which specific areas have been included in the landscaped area calculations. Provide comment from a suitably qualified professional on the viability of the landscaped areas that are in complete shadow mid-winter, as shown on the landscape plan.*

Comment

A Plan demonstrating all areas included in the Deep Soil calculations has been provided in the Amended Architectural Plans provided as an attachment to this letter. A statement has been prepared by a total concept landscape architects that states that the proposed plant species *Elaeocarpus reticulatus*, *Dianella*

caerulea, Viola hederacea, Cordyline stricta, Parthenocissus tricuspidata and Syzygium australe 'Resilience' are all capable of thriving and surviving within shaded areas of the garden, during winter plant species go into a dormancy-like state where they conserve resources to prepare for the next seasons growth.

13.0 Tree Protection Measures

23. *Provide a revised landscape plan showing trees selected from Council's Native Gardening Guide.*

Comment

Amended Landscape Plans have been prepared by atc Landscape Architects that detail all proposed trees as being native to the area. The Amended Landscape Plans are provided as attachment to this letter.

24. *The proposed major encroachments to Trees 10 and 12 would require consent from the neighbouring landowner as the impact proposed by the development affects an asset located on the neighbouring lot, and could cause damage to their property if the resulting development was to compromise the structural viability of these trees as a result. Owners consent has not been provided, and therefore the proposed development is required to be amended to reduce the impact of the development so that it would not result in a major encroachment to the neighbouring trees.*

Comment

The tree protection issues have been reviewed by Redgum Horticultural the project Arborist who have advised that Council have cited major encroachments to Tree 12x7 as neighbouring trees. We believe this is incorrect as Tree 12x7 are situated within the site. Tree 11x4 are situated within the neighbouring property and according to the information we have, the only encroachment to these trees is by the boundary fence. The building is setback sufficiently and is outside the tree protection zone.

If the major encroachment mentioned relates to Tree 11, the existing natural ground levels are being retained in the deep soil zones of the private open spaces for unit 22 & 23, then the only impact to this group is the boundary fence.

Regarding the impact to Tree 10: It is unclear whether Council considered the root mapping report prepared by Redgum dated 3 October 2019 following their investigation which advised the retention of Tree 10 is achievable given the proposed major encroachment providing the recommendations regarding tree protection within the report were adhered to. Therefore, owner's consent is not deemed to be required.

14.0 Shadow Diagrams

25. *The shadow diagrams do not demonstrate the current solar access received by the adjoining impacted dwellings. The amount of sunlight lost is required to be taken into account as well as the amount of sunlight retained.*

Comment

Amended Shadow Diagrams have been provided in the Amended Architectural Plans that detail the shadow impact of the proposal on existing development on adjoining properties. Refer to the Amended Architectural Plans provided as an attachment to this letter.

26. The shadow diagrams do not include all overshadowing impacts on the adjoining impacted residential allotments, which is not an accurate assessment of the solar access received. For example, the shadow diagrams for 18 Francis Street indicate that no overshadowing is occurring at 1pm, however, overshadowing would be caused from the existing dwelling, boundary fencing and development on 20 Francis Street. Revised shadow diagrams must consider overshadowing by fencing, roof overhangs and adjoining development when assessing the overshadowing impacts to the adjoining residential allotments.

Comment

Amended Shadow Diagrams have been provided in the Amended Architectural Plans that detail the shadow impact of the proposal on existing development on adjoining properties. Refer to the Amended Architectural Plans provided as an attachment to this letter.

27. The shadow diagrams are required to be revised to include the location of clothes drying areas of adjoining residential development and include all structures in the rear of the dwelling at 18 Francis Street.

Comment

The Amended Shadow Diagrams included the clothes drying areas and all structures of adjoining properties. Refer to the Amended Architectural Plans provided as an attachment to this letter.

28. The development proposes corners on the internal access paths which are opportunities for concealment. An alternative design is required in these areas. Consideration must also be given to the height of proposed vegetation in these areas and fencing heights. Ensure the revised design includes an assessment of the proposed landscape planting and fencing type and height.

Comment

The design of the proposed development has been amended to remove opportunities for concealment. This has been achieved through the removal of corners on the internal access paths. Refer to the Amended Architectural Plans provided as an attachment to this letter.

15.0 Retaining Walls

29. *Provide revised plans that does not including any structures on the property boundary. In accordance with Part 2.12 of Council's (Sustainable City) Development Control Plan, no retaining walls are to be within 450mm of the property boundary.*

If retaining walls are to be proposed, they must be in accordance with Part 2.12 of Council's (Sustainable City) DCP 2015 and must demonstrate that they do not obstruct the upstream overland flow paths. All plans, including the landscape plan, must show all retaining structures.

Comment

The design of the proposed development has been amended to ensure all retaining structures are setback at least 450mm from the property boundaries and ensure they do not obstruct the upstream overland flow paths. Refer to the Amended Architectural Plans provided as an attachment to this letter.

16.0 Cut and Fill Plan

30. *Provide a revised cut and fill plan which includes the total amount of cut and fill required for the entire development, including the basement area.*

Comment

A revised Cut and Fill Plan has been provided in the Amended Architectural Plans that details the extent of cut and fill required for the development.

17.0 Fencing Plan

31. *The proposed fencing plan is required to be revised to include all proposed retaining walls (all proposed retaining walls to be in accordance with Part 2.12 of Council's (Sustainable City) Development Control Plan 2015.*

Comment

The Cut and Fill Plan includes all proposed retaining walls. Refer to the Amended Architectural Plans provided as an attachment to this letter.

32. *Advise if the proposed 1.8m high decorative privacy fencing is included in the shadow diagrams.*

Comment

All proposed fencing has been included in the Shadow Diagrams provided in the Amended Architectural Plans provided as an attachment to this letter.

33. *It is unclear what is proposed within the space between the two fencing types. Please identify on amended plans.*

Comment

Amended Landscaped Plans have been provided as attachment to this letter. The Landscape Plans detail an amended design that has appropriately addressed the areas of concern raised by Council.

18.0 Acoustic Amenity

34. *Several submissions raised issues regarding acoustic amenity of the surrounding low-density residential allotments. Provide evidence that the acoustic amenity of the surrounding development would not be impacted by the proposed development.*

Comment

The proposed development consists of residential accommodation that has been sited and designed to minimise impacts on the acoustic amenity of surrounding properties. This has been achieved through the appropriate siting and design of private open space areas, communal areas and the windows and openings of the dwellings. The proposed dwellings will also be constructed best manage and minimise the acoustic impact of the proposal.

The only assumed acoustic impact of the development will be during construction which will be temporary in nature and appropriately managed in accordance with the relevant conditions of consent.

19.0 Conclusion

We trust that this further information allows for the progression of the application to public notification and allows for the assessment of the application to progress to determination.

Should you wish to discuss any of the details of this response please do not hesitate to contact **Lachlan** on 9690 0279 or lachlan@theplanninghub.com.au.

Yours sincerely,



LACHLAN RODGERS
SENIOR TOWN PLANNER | THE PLANNINGHUB