Statement of Environmental Effects 1-13 Coleridge Street, Riverwood

Construction of a 4-storey affordable housing residential flat building containing 42 units over basement car parking, including associated tree removal, landscaping, site works and dedication of land.

1-13 Coleridge Street, Riverwood
(Lots 7, 8, 9, 10, 11, 12 in DP35640)

December 2024

NSW GOVERNMENT

Homes NSW

Acknowledgement of Country

Homes NSW acknowledges the Traditional Custodians of the lands where we work and live. We celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW.

We pay our respects to Elders past, present and emerging and acknowledge the Aboriginal and Torres Strait Islander people that contributed to the development of this report.

We advise this resource may contain images, or names of deceased persons in photographs or historical content.

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

Copyright and disclaimer

DOCUMENT CONTROL REGISTER

The following register documents the preparation and issue of this Statement of Environmental Effects for Homes NSW.

No	Date	Version	Change since last version	Pages
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2	December 2024	Final	Various	Various

DOCUMENT SIGN-OFF

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1 Executive Summary

This Statement of Environmental Effects (SEE) has been prepared pursuant to Section 4.12 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to accompany a Crown Development Application (DA) being lodged by Homes NSW for an affordable housing residential flat building (RFB) development at 1-13 Coleridge Street, Riverwood. The development will be undertaken by, or on behalf of, Homes NSW (NSW Land and Housing Corporation). The proposal is described as:

> *Construction of a 4-storey affordable housing residential flat building comprising 42 apartments over basement carparking with 19 spaces, including associated tree removal, landscaping, site works and dedication of land.*

The site is zoned R4 High Density Residential under the *Georges River Local Environmental Plan 2021* (GR LEP 2021). Development for the purposes of a residential flat building is permitted with consent in the zone. The development is for the purposes of affordable housing and is to be carried out pursuant to Chapter 2 Part 2 Division 1 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP).

The proposal is consistent with the objectives and provisions of the EP&A Act and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), as well as relevant State Government policies and local controls.

The proposed Crown development has an estimated development cost over $5 million. It is therefore considered regionally significant under *State Environmental Planning Policy (Planning Systems) 2021* and will be determined by the Sydney South Planning Panel.

The proposed development has been designed to respond and contribute positively to the existing and desired future character of the locality. Careful consideration has been given to the massing of the built form and the relationship of the proposal with surrounding properties and streetscape. Careful consideration has also been given to the specific characteristics of the site, including slope and orientation of the lots to minimise environmental impacts and maximise tenant amenity.

Pre-lodgement comments were received from Council's Development Assessment team on 30 January 2023. The proposal has been designed in consideration of Council's comments.

The assessment of the proposed development indicates that the height, bulk and scale will not result in any significant adverse impacts on the surrounding natural or built environment and the development will result in a positive social and economic contribution to the locality.

Accordingly, it is requested that the DA be determined favourably.

2 Introduction

This SEE has been prepared under Section 4.12 of the EP&A Act to accompany a Crown DA being lodged by Homes NSW for an affordable housing residential flat building development at 1-13 Coleridge Street, Riverwood.

The development is for the purposes of affordable housing and is to be carried out pursuant to Chapter 2 Part 2 Division 1 of the Housing SEPP.

This development application seeks consent for the redevelopment of the land pursuant to the Housing SEPP, Georges River LEP 2021 and DCP 2021, and involves the following:

- Construction of a 4-storey residential flat building comprising 42 apartments, as follows:
  - 22 x one-bedroom units, and
  - 20 x two-bedroom units,
- Basement car parking for 19 vehicles (including 5 accessible spaces), 6 bicycle spaces, storage, and services,
- Provision of a photovoltaic solar system on the rooftop,
- Vehicular and pedestrian access to the site from Coleridge Street,
- Secure waste enclosure that accommodates 5 x 1100L recycling bins, 5 x 1100L waste bins, and 4 x 1100L FOGO bins and a bulky waste storage room,
- Removal of 17 trees (including 7 exempt species) across the site, including 1 street tree,
- Associated landscaping and civil works,
- Consolidation of 6 existing lots into a single title,
- Provision of private and communal open space areas,
- Landscaping and deep soil zones, particularly at side and rear boundaries,
- FSR of 1.16:1 and maximum height of approximately 14.85m, and
- Dedication of land to Council for the provision of a through-site link along the western side boundary.

Homes NSW provides social housing for people living in NSW on low incomes who are unable to access suitable accommodation in the private rental market. Homes NSW therefore plays a key role in implementing the objective of providing and maintaining affordable (social) housing under the EP&A Act. Demand for social and affordable rental housing is increasing. The current social housing waitlist in NSW currently exceeds 62,500 households.

The proposed development will contribute to the growth of the State Government's social housing portfolio that is fit for purpose, well located, and offers a better tenant experience.

The proposed development is also consistent with the *Greater Sydney Region Plan — A Metropolis of Three Cities* by accelerating the supply of housing in suitable locations.

The following sections of this report describe the site and an analysis of the surrounding locality, details the proposed development and provides an assessment of the proposal against the statutory and strategic planning framework as required under Section 4.15 of the EP&A Act; the EP&A Regulation; and associated legislation.

The proposal is considered to have planning merit, and it is therefore requested that the DA be recommended for approval.

3 Site Details

3.1 Site Description

The subject development site is commonly known as 1-13 Coleridge Street, Riverwood and is legally referred to as Lots 7-12 in DP 35640. The site is located on the southern side of Coleridge Street, has an area of 2,911m^2 and is irregular in shape (**Figure 1**). It has a frontage (northern boundary) of 115.3m to Coleridge Street, and west and southeast side boundaries of 35.3m and 74.9m respectively. The southeast boundary adjoins the 'T8 Airport and South' railway line and Council's Phillip Street Reserve, and is approximately 124.25m in length.

Each lot forming the development site is currently vacant, with all dwellings and structures having been previously demolished (refer to **Figure 2** & **Figure 3**).

Figure 1 – Aerial image of subject site (red). (Source: NearMap, image date 21 September 2024)

Figure 2 – Subject site as viewed from the northeast corner (Source: Homes NSW Site Inspection, May 2022)

Figure 3– Subject site looking towards 15 Coleridge Street. (Source: Homes NSW Site Inspection, May 2022)

Figure 4 Subject site looking south towards Phillip Street Reserve. (Source: Homes NSW Site Inspection, May 2022)

Figure 5 Subject site looking southeast towards the railway corridor. (Source: Homes NSW Site Inspection, May 2022)

3.2 Topography

The detailed survey shows that the site has a gentle cross fall toward the street from a high point of RL 27.31m at the northeast corner to a low point of RL 23.09m at the north western boundary. Refer to **Figure 6** below for an extract of the Survey Plan.

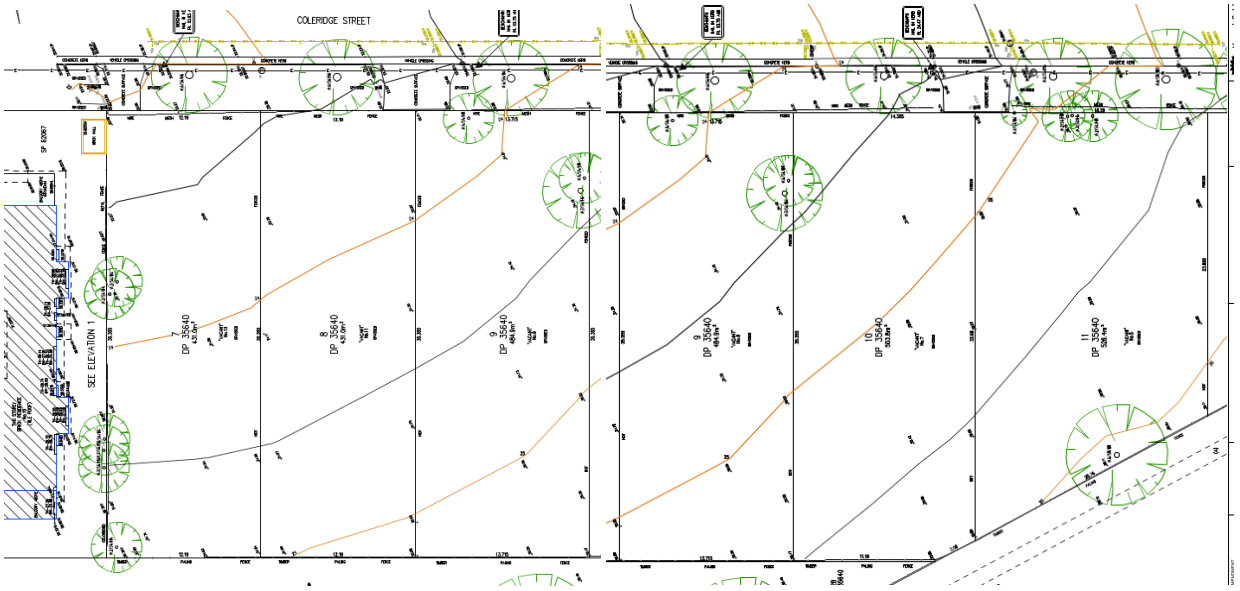

Figure 6 - Extract of Survey Plan. (Source: Total Surveying Solutions, dated 29 September 2021)

3.3 Services

The survey plan indicates that water, sewer, overhead electricity, and telephone services are available to the site. NBN Co indicates that NBN is available in this locality.

Three power poles are located across the frontage of the site. The existing power poles are likely to remain unaffected by the works and the proposed driveway access.

3.4 Drainage

The site slopes approximately 4.2m from the north-eastern corner to the north-western corner of the site. Stormwater drainage directly to Coleridge Street is therefore achievable, and a stormwater design has been developed in accordance with Council's stormwater management controls.

Stormwater will be collected via a series of stormwater pits and pipes on site, connected to a 71m^3 underground on-site detention tank (OSD) and 5000L rainwater tank within the basement. The OSD will be connected to a kerb inlet pit located to the west of the site in front of 15 Coleridge Street.

3.5 Flooding

The development site is not identified as being within the Flood Planning Area.

Notwithstanding, the driveway entry & footpath falls at Coleridge Street and all lobby entries have been designed to provide freeboard protection to external levels.

3.6 Vegetation

An Arboricultural Impact Assessment, prepared by Creative Planning Solutions, has identified 34 trees within and adjoining the subject site, including within the road reserve in front of the site (refer to extract of tree constraints plan in **Figure 7**). A total of 17 trees are proposed for removal to facilitate the proposed development, including one (1) street tree and one (1) tree located on the front boundary of the site and the road reserve (tree 22). 7 trees that are proposed for removal are exempt species under the provisions of the Georges River Tree Management Policy 2024.

Within the site and adjoining properties, 19 low retention value trees have been identified, 14 of which are proposed to be removed (Trees 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 25, 29, 33, 34). The remaining low retention value trees are located on adjoining properties at 15 Coleridge Street and the rear rail corridor, and therefore are proposed to be retained and protected through the works. Tree 13 (*Photinia robusta*) was observed to be in severe decline as evidenced by substantial basal decay and high levels of epicormic growth. As such, it is not expected that this tree will remain viable beyond the short term. Trees 15, 16, 17, 23, 25, 29 & 34 (*Ligustrum lucidum, Ligustrum sinense, Schefflera actinophylla & Syagrus romanzoffiana*) are identified as weed species of low landscape significance and are exempt from the need to obtain approval for their removal under the provisions of *Georges River Council Tree Management Policy 2024*. Trees 14 & 33 (*Pittosporum undulatum*) are likely self-seeded and are not significant within the surrounding landscape. Trees 19, 20 & 21 (*Cupressus sempervirens*) are generally of low landscape significance. Tree 22 (Cupressus sempervirens) is a mature tree which straddles the front boundary of the subject site. As shown on the site survey, greater than 50% of the trunk of this tree is positioned within the adjacent street verge and therefore it falls under Council ownership. However, this tree does not form part of the uniform planting alignment of street trees 1 to 10. This tree is of low landscape significance and is located within the proposed building footprint and therefore identified for removal.

Three (3) medium retention value trees have been identified within the subject site and within the road reserve at Coleridge Street (Trees 5, 18, 24). 2 medium retention value trees are proposed to be removed. Tree 5, as a street tree, will be retained and protected during the works.

Trees 18 and 24 will experience encroachment by the proposed building footprint and therefore are proposed to be removed and replaced.

Twelve (12) high retention value trees have been identified within the road reserve located on Coleridge Street and the Council reserve at the rear of the site. All high retention value trees are proposed to be retained and protected during the works, except for Tree 3 (*lophostemon confertus)* which will experience major impacts to its tree protection zone (TPZ) and structural root zone (SRZ) as a result of the proposed stormwater system and driveway crossover. Accordingly, this street tree is proposed for removal.

A detailed Arboricultural Impact Assessment has been provided as part of the DA submission at **Appendix D** that assesses impacts of the proposed development on existing trees, identifies the trees to be removed and recommends appropriate tree protection measures for the trees being retained.

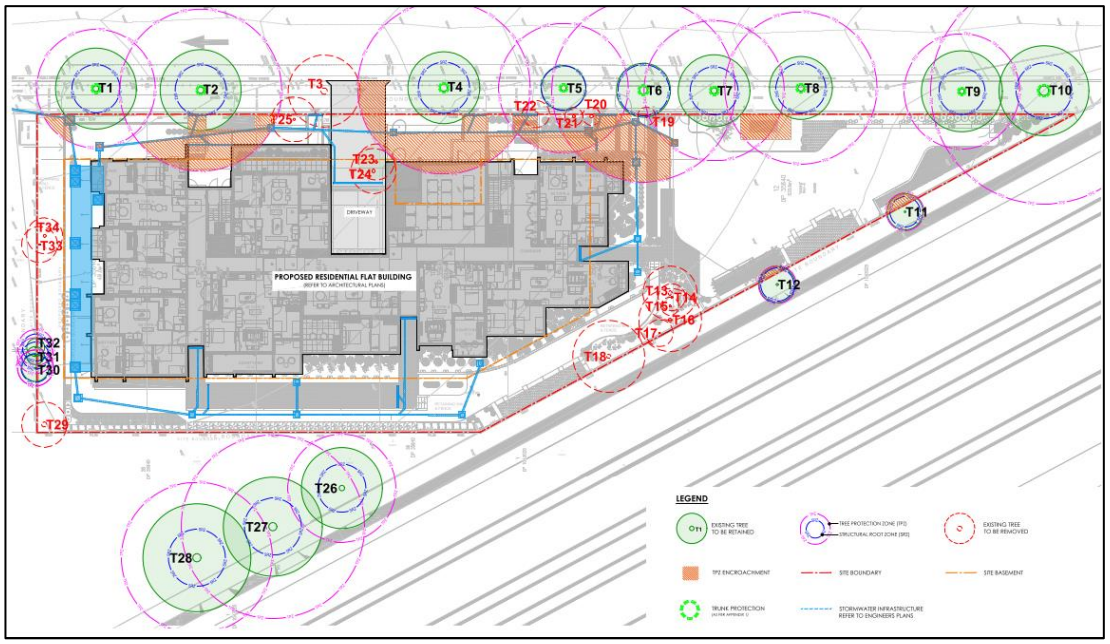

Figure 7 Extract of Arboricultural Impact Assessment. (Source: *Creative Planning Solutions, dated 01 November 2024)*

4 Site Context and Locality

4.1 Context

The site is situated in an established medium-high density residential area which is undergoing significant growth, with several recently constructed residential flat building developments in vicinity of the site. The surrounding streetscape is characterised by a mix of older style and newly constructed residential flat buildings, single and double storey residential dwellings and multi dwelling housing as shown in **Figure 8** to **Figure 13** below.

The site is located at the eastern end of the Coleridge Street cul-de-sac, with an established multi dwelling housing development located to the west, and Phillip Street Reserve to the rear southern boundary as shown in Figure 1 above.

Figure 8. Existing RFBs at 15 and 17 Coleridge Street (Source: Homes NSW Site Inspection, May 2022)

Figure 9. Existing RFB at 4-6 Coleridge Street (Source: Homes NSW Site Inspection, May 2022)

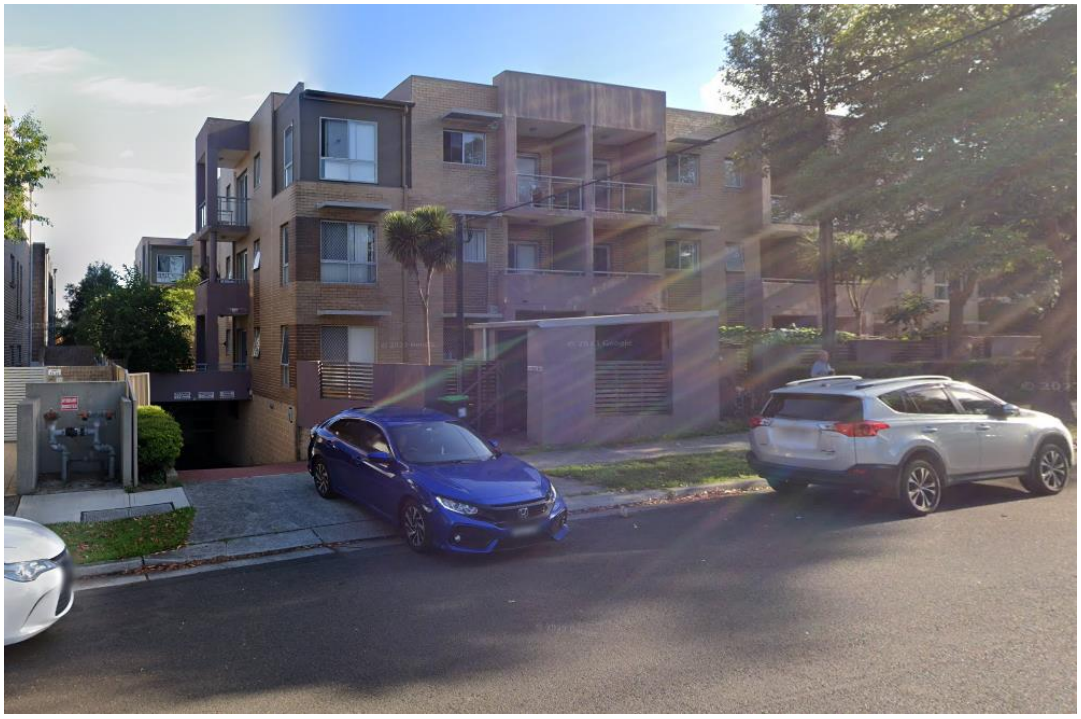

Figure 10: High density residential development located opposite the site (8-12 Coleridge St). (Source: Google Street View January 2023)

Figure 11 High density residential development located opposite the site (14-18 Coleridge St). (Source: Google Street View January 2023)

Figure 12: Low density residential dwellings located opposite the site (20 & 22 Coleridge St) (Source: Google Street View January 2023).

Figure 13: Existing RFBs at 5 and 6 Phillip Street (Source: Homes NSW Site Inspection, May 2022)

The site is located in close proximity to public open space, and public transport (train and bus) services. It is approximately 600m walking distance from Riverwood Plaza and 300m from Riverwood train station (see Figure 14). The closest bus stops are at the intersection of Belmore Road and Coleridge Street (ID 221046 and ID 2210285) and are approximately 185m walking distance or 3 minutes' walk from the site.

Both bus stops are serviced by 4 bus routes that stop at Westfield Hurstville and run at the required frequency in accordance with the Housing SEPP. Given the site's close proximity to both Riverwood train station and the 2 bus stops listed above, the site is in an 'accessible area' as defined in the Housing SEPP.

Figure 14: Subject site (outlined blue) with route to closest bus stop (green line) and Riverwood train station (orange line). Source: NearMap

5 Proposed Development

Homes NSW is proposing the redevelopment of the land for an affordable housing residential flat building pursuant to the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP). The main features of the proposed development are summarised as follows:

- Construction of a 4-storey residential flat building comprising 42 apartments, as follows:
    - 22 x one-bedroom units, and
    - 20 x two-bedroom units,
- Basement car parking for 19 vehicles (including 5 accessible spaces), 19 bicycle spaces, storage, and services,
- Provision of photovoltaic solar system on the rooftop,
- Vehicular access to the site from Coleridge Street,
- Two pedestrian access points from Coleridge Street,
- Secure waste enclosure that accommodates 5 x 1100L recycling bins, 5 x 1100L waste bins, and 4 x 1100L FOGO bins and a bulky waste storage room,

- Removal of 17 trees (including 7 exempt species) across the site, including 1 street tree,
- Associated landscaping and civil works,
- Consolidation of 6 existing lots into a single title,
- Provision of private and communal open space areas,
- Landscaping and deep soil zones, particularly at side and rear boundaries,
- FSR of 1.16:1 and maximum height of approximately 14.85m, and
- Dedication of land to Council for the provision of a through-site link along the western side boundary to Phillip Street Reserve.

A copy of the Architectural Plans prepared by WMK Architecture are provided in **Appendix E**. Excerpts of the 3D street massing diagram, section plan, site plan, floor plans and basement plan are provided in **Figure 15** to **Figure 19** below. The development is proposed to be undertaken by, or on behalf of Homes NSW (LAHC).

Figure 15 – 3D Photomontage of proposed development viewed from the northern side of Coleridge Street. (Source: WMK Architecture, November 2024)

Figure 16. Section view 1 (east-west). Source: WMK Architecture, dated 18 October 2024

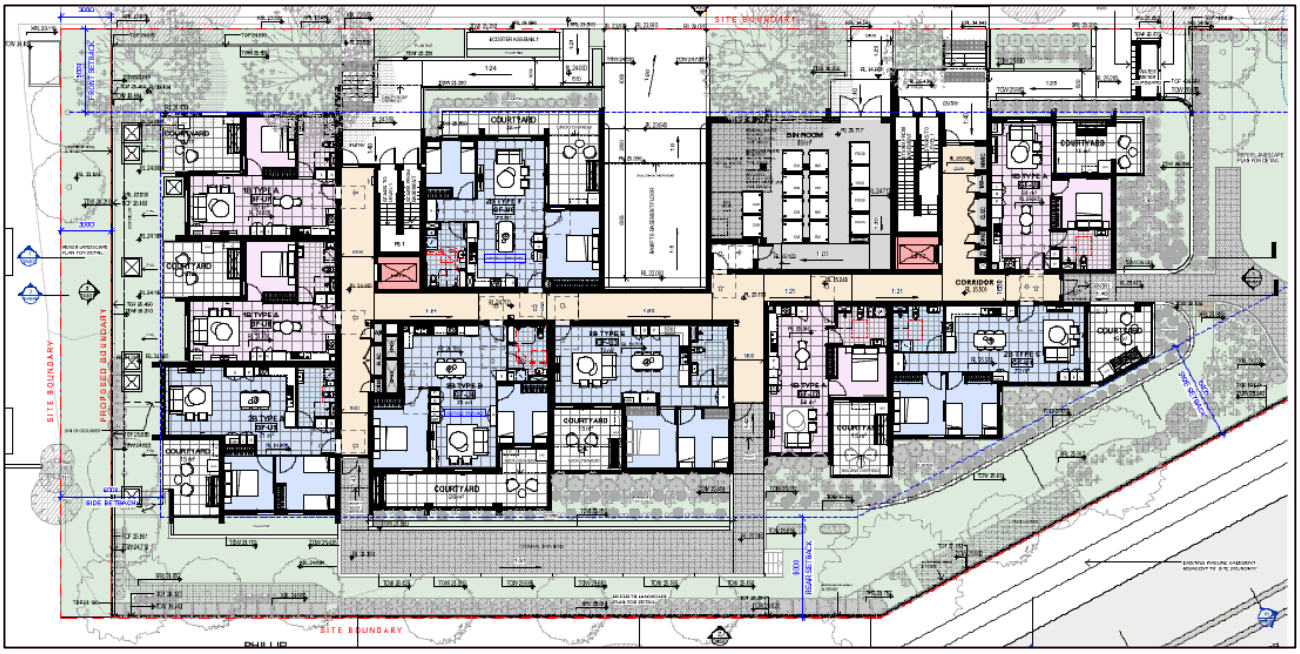

Figure 17. Site/ground floor plan. Source: WMK Architecture, dated 18 October 2024

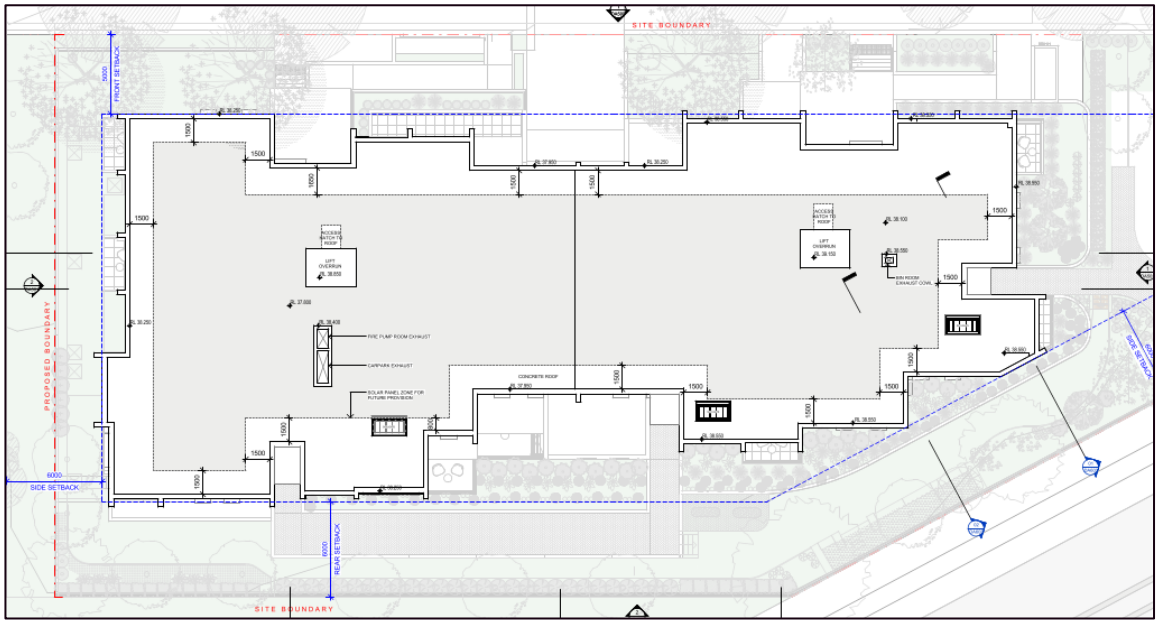

Figure 18. Roof Plan. Source: WMK Architecture, dated 18 October 2024

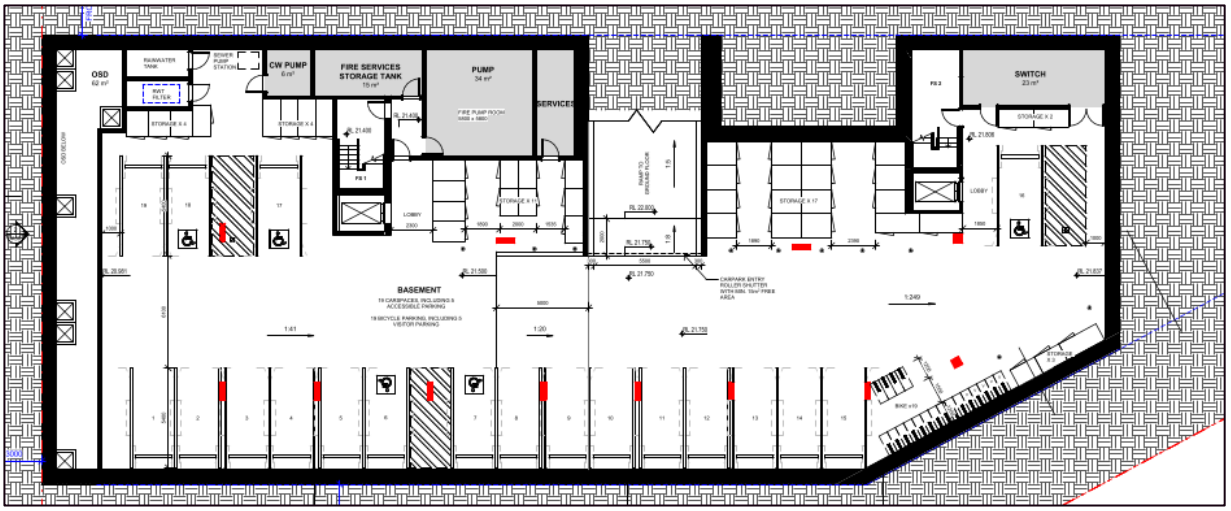

Figure 19. Basement floor plan. Source: WMK Architecture, dated 18 October 2024

6 Pre-DA Comments

Homes NSW have previously consulted with Council in relation to the proposed development. Pre-lodgement comments were received by Council on the 30 January 2023 in relation to the matters discussed at a Pre-lodgement meeting held on 14 September 2022. Following the Housing SEPP changes in December 2023, the proposal was amended in accordance with Council's comments and the new Housing SEPP framework. The proposal has been designed in consideration of Council's comments, and a summary of the responses is provided below (note: the issues have been grouped to avoid repetition):

Council Comments	Homes NSW Response
Planning Comments	
Height The proposed height of the building is 13.6m which as noted, exceeds that permitted height under the Georges River Local Environmental Plan 2021 (GRLEP) which permits 12m.	Section 16(3) of the Housing SEPP permits an additional building height of 30% for the development, given that the affordable housing component exceeds 15%. Accordingly, the maximum permissible building height for the site is 15.6m. The proposed building height is 14.85m.
Setbacks Encroachment to side setbacks – Council had no objections, subject to requirements including privacy measures	Noted. The proposed development has now been designed to comply with the setback requirements of the ADG and GRDCP 2021.
Communal Open Space Council will not be supportive of an application that does not allow for the COS to be easily identified as the private domain and utilised by occupants	Noted. The proposed development includes clearly delineated pathways connecting lobby entries to and from the communal open spaces to ensure that appropriate wayfinding can be achieved for occupants.
Context & Connectivity It is strongly recommended to incorporate a pedestrian link / through site link to enhance connection to Phillip Street Reserve.	The proposed development includes the provision of a turfed through-site link along the western side boundary of the site. This is proposed to be dedicated to Council at the time of lot consolidation.
Topography It is recommended that the proposal be amended to address the existing site topography. Steps and ramps are a barrier to visual and physical engagement with the public domain and open space. Hence, the design should be amended for the proposed ground floor FFLs to be relative and the habitable areas generally above the surrounding existing natural ground to provide the required amenity. The building should be designed to achieve reduction in the number of steps and ramps across the site	The proposal has been refined to ensure that the development responds appropriately to the site's topographical constraints. All habitable floor areas are located above the natural ground level to ensure that appropriate amenity, including solar access, can be achieved to ground floor units. Furthermore, internal ramping in long corridors has been utilised so that the western-most apartments and lobby entries can maintain reasonable levels to the existing ground and provide suitable street address while maintaining the usability of the basement.
To provide an appropriate response to the existing topography, the length of the building should be broken into three envelopes at different FFLs. This will create interest and break the monotonous façade and minimise perceived bulk and scale	The length of the building has essentially been designed to operate as two buildings (with three main masses), achieved with separate lift cores and floor level RLs servicing both components. Although presenting as one building from the streetscape, various architectural treatments have been employed to reduce the building's perceived bulk, including:

	- articulation and recessed elements across the Coleridge Street façade, through the provision of two entry lobbies and the recessed middle portion. This breaks up the perceived length of the facade, - an evolving materiality that promotes visual interest and frames articulated elements, particularly when viewed from the public domain, and - landscape planting within the front setback which softens the impact of the built form.
The proposal should be referred to Council's stormwater engineer to ascertain the impact on stormwater flows on the habitable rooms below the existing natural ground.	The proposed development has been designed such that no subterranean units are proposed.
<u>Pedestrian Circulation – Building Entry</u> The design should be amended to incorporate a visually prominent building entry. Innovation in design to make the building entry aesthetically appealing should be applied. The building entry should contribute to the identity of the building and the streetscape.	The proposal has been designed to provide two visually prominent building entries, both accessible from the Coleridge Street frontage. The entries have been framed using the darker fibre-cement and metal cladding to ensure that the building entries are discernible from the wider brick materiality of the building.
It is highly recommended for the proposed centrally located Bin Room to be located discreetly away from the front of the development. Relocating the Bin Room to the basement should be considered. This will also provide opportunity to accommodate a grand entrance to the residential lobby with physical and visual connection to open space.	The proposed bin room has been located to provide ease of servicing access to the street, while the central location on the ground floor ensures that travel distances for occupants have been minimised. The waste room achieves visual separation from the building entries through level differences and separate entry pathways. The bin carting route has been maintained in compliance with Council's WHS requirements.
<u>Communal Circulation Space</u> The residential lobbies and common circulation space should be redesigned to provide opportunity for casual social interaction, daylight and natural ventilation. Given the ground floor corridor length, the corridor should be articulated to allow comfortable movement, opportunity for social interaction and provide interest.	Residential lobbies and corridors are articulated to minimise the extent of long corridors and have access to daylight and ventilation through openings at the front and rear facades. High quality communal open space provided at the rear and east of the site also contributes to opportunities for social interaction amongst tenants.
<u>Public and Private Pedestrian Path</u> Minimising the paved area should be considered. The proposal should be referred to Council's landscape architect for detailed comments on the landscape design. It is recommended that the applicant should employ a qualified landscape architect to design the COS and the pedestrian connections, which are interesting and desirable for the future residents.	The landscape plan **(Appendix O**) has been prepared by a suitably qualified landscape architect. The proposed public footpath now terminates at the western pedestrian entrance to the building. Paved areas have been minimised where possible, while still providing suitable access to communal landscaped areas.
<u>Vehicular Access</u> Relocating the driveway/ basement access to be minimum 6m from the western boundary is recommended. This will facilitate provision of the through site link / laneway to enhance connection to the Phillip Street Reserve and deep soil planting within the side setback.	The driveway/basement access has been relocated centrally within the site and is therefore more than 6m from the western boundary. The basement entry has been integrated into the façade design and away from pedestrian entries to minimise

The car park access should be integrated with the building's overall façade to minimise impact on the streetscape and conflict between pedestrians and vehicles.	potential conflicts between pedestrian and vehicular movements.
<u>Amenity - Acoustic Privacy</u> The design should be amended for the bedrooms of Unit 2 and 3 to be located minimum 3m from the Bin Room. As per Recommendation 2, it is highly recommended that the bin room should be relocated to the basement.	The bin room has been located a minimum of 5m away from any adjoining residential units on either side. The bin room has been located on the ground floor for ease of servicing and to avoid excessive floor-to-ceiling heights required with a basement servicing arrangement. The overall length of the building allows for the bin room to be located at ground level such that it does not result in a dominant element fronting the streetscape.
Design solutions to minimise the noise impact should be incorporated in the design of all habitable rooms along the rail corridor.	As identified in the submitted Acoustic Report (**Appendix B),** habitable rooms facing the rail corridor will achieve the required internal noise levels with the windows closed. Alternative ventilation is proposed for these apartments to ensure the ventilation requirements of the BCA are met. Refer to Section 5.1.4 of the Acoustic Report.
<u>Communal Open Space / Deep Soil Zone</u> It is recommended that the design should be amended for the COS to be well integrated with the design of the building with equitable and seamless access from all the apartments. Windows and private open spaces should be provided on the eastern façade to provide passive surveillance to the COS. If any fencing is proposed for the courtyards at ground, it should be a palisade fence. This will not only make the COS more appealing and usable, it will also contribute to the appeal of the development	The proposal has been designed to ensure that the communal open space located at the south and east side of the building is easily accessible through multiple building entries and via easily identifiable pathways. Passive surveillance of these areas is achieved via the adjacent courtyards, living rooms and balconies of the south and east facing units, as well as through the use of open-style palisade fencing along the site perimeter.
<u>Public / Private Interface Treatment</u> Council's preference will be for there to be no fencing between the Phillip Street Reserve and the subject site. The public private separation could be achieved by subtle variation through planting and level changes. If a fence is preferred at the southern boundary, the preference will either be a palisade fence with a maximum 1.2m height or a 900mm solid masonry fence with planting. Balconies and windows on the southern façade of the building should overlook the Reserve.	A combination of retaining wall, palisade style fencing and landscape planting has been proposed along the rear southern boundary to balance the need for security, to address the level changes between the site and the reserve, and to provide a desirable interface at the property boundary. Balconies and windows on the southern façade of the building have been designed to overlook the Reserve.
<u>Site Services</u> Additional information should be provided on the location and treatment of site services. The building services should not dominate the street frontage, have an impact on street activation or diminish the prominence of the main residential pedestrian entrance. Relocating the substation to the eastern corner of the site should be considered to minimise its visual impact on the streetscape, acoustic and visual impact on the residents and functionality / usability of the COS.	Building services are largely located within the basement. Where this is not possible, required services such as the booster assembly and water meter cupboard have been suitably screened so as not to detract from the main pedestrian entrance or streetscape. The substation has been located at the eastern portion of the site close to the street frontage, such that it does not dominate the building façade and maintains a usable communal open space for residents.
<u>Apartment Mix</u> It is recommended that the proposal should be amended to include studio and 3 bedroom apartments. Some of	The proposed unit mix for 1- and 2-bedroom units has been selected to address demand for social housing within the Riverwood area. Homes NSW has larger

the 3 bedroom apartments should be adaptable housing units.	properties elsewhere within our portfolio to address the needs of larger households and families.
<u>Architectural Expression</u> It is recommended that the architectural expression of the elevations and overall built form be amended to enhance the streetscape. The design and façades should be a balanced composition of building elements, textures, massing, colours and material for the development to make a meaningful contribution to the area and streetscape. The façade should be well articulated and modulated to minimise the emphasis on horizontality and the impact of scale and bulk. Variation of detail and use of different building materials that effectively contrast the rest of the façade should also be considered to break the monotony of the elevations and provide interest. Recessing and projecting massing and elements to break down the mass and avoid flat monotonous facades and amending the flat roof to a more interesting roof form should be considered.	The façade utilises various design strategies to minimise the bulk and scale of the building length, including but not limited to, - articulation of the brick blade walls to provide visual interest, - Recessed building footprint located at the mid-point of the building to break up the bulk and portray the building as being two separate components, and - A material palette that frames the different portions of the façade and to break up the monotony of the brick materiality.
<u>Traffic comments</u> It is recommended the applicant be advised the following will need to be included in any development application to Council: (a) The ramp width for the first 6m inside the property be reduced to 5.5m to minimize the loss of on street parking (b) Submission of a driveway long section/profile. This profile (scale 1:20) is to show levels and grades from road centreline to the proposed internal garage floor level including but not limited to levels of, Road centreline, changes of grade on road surface, lip of gutter, invert of gutter, back of vehicular crossing (gutter layback), front of path, back of path and boundary. The profiles provided are to also include the natural surface of the land as well as the proposed design including cut and fill dimensions. (c) A Traffic and Parking Impact Assessment Report prepared by a suitably qualified and experienced traffic engineering professional.	Refer to the Traffic & Parking Impact Assessment prepared by Samana Blue Engineering (**Appendix W**), which discusses the driveway and access ramp, as well as the proposed internal manoeuvring, and confirms that the proposal can comply with the requirements of AS2890.
<u>Arboricultural comments</u> The proposed removal of the Lophostemon confertus street tree has been referred to Council's Team Leader - Tree Maintenance for advice, who has advised that given that the tree forms part of an avenue and there are 2 x vehicular crossovers existing, the removal of this tree is not supported. The applicant's Preliminary Arborists Report has also indicated that the tree is high retention value. Using the IACA STARS industry standard methodology the proposal should be designed to retain this tree. Given the length of the site and space available, it is recommended that the applicant review the proposed vehicular access to the site to potentially make use of one of the existing vehicular crossovers or provide access between trees. The proposed removal of trees within the site is supported subject to the provision of suitable replacement planting at a minimum 2:1 replacement	The development proposes the removal of 2 street trees, including one (1) Brush box (*Lophostemon confertus*) as a result of encroachments from the proposed vehicular crossing and stormwater infrastructure within the front setback. The proposed street tree removal is discussed further in Section 3.6. Noted. A landscape plan has been prepared that includes replacement planting to offset the proposed tree loss.

quantity. Tree species should be selected from Council's Tree Management Policy 2019 (Appendix 1).	
Engineering The road frontage is affected by 100-year flood. This shall be considered in the design of driveways and the basement. A flood impact report shall be prepared addressing the flood affectation and prevention of flood water entering the basement car park. Report shall be prepared by a qualified civil engineer specialising in flood assessments and design.	Updated advice issued by Council's Stormwater Assets Engineer on 17 July 2024 indicates that Coleridge Street is not affected by the 1% AEP and PMF flood events. Notwithstanding, the basement ramp has been designed to achieve freeboard at the property boundary to ensure that basement is protected from the ingress of surface flows in major storm events.
Stormwater Drainage and On-site Stormwater Detention A direct connection into Council's underground stormwater system will be required to comply with the requirements of Cl 3.3 (e) of the Stormwater Management Policy. A Stormwater Concept Plan prepared by a qualified civil/stormwater engineer in accordance with the requirements of Clause 2.1 of Council's adopted stormwater Management Policy(SMP) is required to be submitted, along with Council's Stormwater and OSD Documentation Checklist.	The proposed stormwater design incorporates a direct connection to the stormwater pit located within the frontage of the adjoining property at 15 Coleridge Street. Refer to **Appendix T and U**.
Water Sensitive Urban Design measures are to be incorporated to the stormwater design as illustrated in chapter 7 of the Stormwater Management Policy.	Noted. A stormwater drainage plan has been prepared that includes implementation of WSUD measures. Refer to the Stormwater Plan and Report at **Appendix T and U** for further information.
Public Domain An appropriate foot path shall be constructed with the approval of Council's Assets and Infrastructure unit.	A footpath is proposed along the frontage of the proposed building. To avoid unnecessary impacts to the street trees located in front of the eastern portion of the site, the footpath is proposed to terminate at the edge of the building footprint.
Waste Management A redesign is required to address the significant issues with the design to ensure waste management is considered according to Council's requirements and in line with best practice.	The proposed bin room has been amended such that it is centrally located to minimise travel distances for residents and is physically separated from adjoining units. Sufficient bin storage has been provided for all waste streams in accordance with Council's waste generation rates. The development will utilise Council's Wheel Out Wheel Back service, and is located within 15m of the kerbside. Waste facilities and chute systems on each residential floor have not been provided. In accordance with LAHC preference, as a long-term asset holder, a central bin storage location has been provided to minimise ongoing maintenance burdens.

7 Strategic Planning Framework

A summary of the relevant New South Wales strategic plans that apply to the site and locality is provided below.

7.1 Future Directions for Social Housing

The NSW Government announced its 10-year vision for social housing on 24 January 2016 called the *Future Directions for Social Housing in NSW*.

The plan has three strategic priorities:

- To provide more social housing
- To provide more opportunities, support and incentives to avoid and/or leave social housing
- To provide a better social housing experience

An identified action to meet the strategic priorities of the plan include increasing redevelopment of Homes NSW (previously Land and Housing Corporation) properties to renew and grow supply.

The plan identifies the increasing need for social and affordable housing, with 62,500 households on the NSW social housing waiting list at October 2024. Specifically, in the Riverwood allocation zone (CS10) in which the site is located, the wait times are between 5-10 years for 1-bedroom dwellings and greater than 10 years for 2-bedroom dwellings.

The proposed residential flat building development is in direct alignment with the *Future Directions for Social Housing* actions, particularly increasing development of Homes NSW properties to renew and grow supply and is therefore consistent with the strategic priorities of the plan.

7.2 Greater Sydney Regional Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan — A Metropolis of Three Cities* was adopted in 2018 and "*is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. This is consistent with the 10 Directions in Directions for a Greater Sydney which establish the aspirations for the region over the next 40 years and are a core component of the vision and a measure of the Plan's performance*."

Direction 4 of the regional plan is Housing the City which endeavours to provide residents with housing choice and includes the following objectives:

- Objective 10. Greater housing supply
- Objective 11. Housing is more diverse and affordable

This proposal, which will expand the supply of affordable housing is consistent with these objectives. The site is located within the Georges River local government area which is part of the South District, and the details of this plan are provided below.

7.3 Our Greater Sydney 2056 - South District Plan

Our Greater Sydney 2056 South District Plan was adopted in March 2018 and covers the local government areas of Georges River, Sutherland, and Canterbury-Bankstown. Similar to the main regional strategy, the South District Plan identifies planning priorities to achieve a liveable, productive and sustainable future for the District, which includes a priority to provide housing supply, choice and affordability, with access to jobs, services and public transport.

The South District Plan set a target of 83,500 additional dwellings for the region by 2036. The Plan also acknowledges that multi-unit dwellings can provide important affordable housing opportunities and identifies that opportunities for urban renewal for social housing should consider accessibility to services, transport and jobs.

This proposal will provide 42 affordable housing apartments in close proximity to services, transport and jobs in an area expected to see an increase in demand for housing, specifically single person households. The proposal will allow for a diverse mix of housing in the Riverwood locality that will cater for various social and economic needs.

7.4 Georges River 2040 Local Strategic Planning Statement

The Georges River Local Strategic Planning Statement was endorsed by Georges River Council in March 2020. It is a 20-year plan that seeks to realise the vision of *a productive place to live, work and enjoy with diverse, active, green, well designed and connected places* through 5 interrelated themes:

- Access and movement
- Infrastructure and community
- Housing and neighbourhoods
- Economy and centres
- Environment and open space

Furthermore, 20 Planning Priorities are identified to facilitate the delivery and realisation of the desired future for Georges River. Under the theme 'Housing and neighbourhood', the challenge of facilitating a supply of a diversity of housing is discussed. Planning Priority 9 under the relevant theme highlights the need to provide a mix of well-designed housing for all life stages to cater for a range of lifestyle needs and incomes.

The proposed development will contribute 42 units to the affordable housing supply in the Georges River LGA. All units will comply with the Silver Level Liveable Housing requirements and five (5) adaptable housing units will be provided. It is diversifying residential uses in Georges River by introducing an affordable housing development that is well serviced by existing public transport options and essential services, while providing inclusive housing that caters for a diverse range of needs for tenants.

The proposed development contributes to the objectives of the Georges River Local Strategic Planning Statement with the provision of 42 affordable housing units.

7.5 Georges River 2022-2032 Community Strategic Plan

The Georges River 2022 - 2032 Community Strategic Plan is a 10-year plan that outlines 6 broad inter-related themes derived from an extensive community engagement process, which identified priorities for the community's future. The themes are as follows:

- Our community
- Our green environment
- Our economy
- Our built environment

- Our place in Sydney
- Our governance

The 6 themes are further broken down into key goals and strategies for Council to facilitate, in partnership with the community, government agencies and business. Under the theme 'Our built environment', the goal of affordable and quality housing options is identified. The proposed development for 42 affordable housing units is consistent with this goal as it provides new affordable housing within the LGA which integrates renewable practices and provides a high-quality development that will contribute to the character of the local area. As such, the proposal is not in conflict with the Georges River 2022 - 2032 Community Strategic Plan.

8 Planning and Design Framework

8.1 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) came into effect on 25 August 2017. In this regard, the site is not identified as being within an area of Outstanding Biodiversity Value, and the extent of clearing for the development will not exceed the biodiversity offsets scheme threshold. 17 trees are proposed to be removed as they are either a weed specimen, have a Low Retention Value and/ or Low Significance Scale, or are located in a position where they cannot be retained due to the proposed building footprint and associated infrastructure works, where encroachment will have an adverse impact on roots and crown for viability and stability. It is noted that only 10 trees require consent for removal, as 7 species are identifies as being exempt trees as per Council's Tree Management Policy.

Based on the criteria set out in Section 7.3 of the BC Act, the proposed development is unlikely to significantly affect threatened species or ecological communities, or their habitats, as the land is not known to contain threatened species, ecological communities or constitute habitat of threatened species. The proposed development will not be a key threatening process and the land is not part, or in the vicinity, of any declared area of outstanding biodiversity value.

Based on the above, it is considered that the proposed development is unlikely to significantly affect threatened species or ecological communities, or their habitats and therefore no further assessment is necessary under this Act.

8.2 Environmental Planning and Assessment Act 1979

8.2.1 Objects of the Act (Section 1.3)

The objects of this Act are as follows:

(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,

(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,

(c) to promote the orderly and economic use and development of land,

(d) to promote the delivery and maintenance of affordable housing,

(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,

(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),

(g) to promote good design and amenity of the built environment,

(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,

(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,

(j) to provide increased opportunity for community participation in environmental planning and assessment.

In response to rising housing costs and a decline in housing affordability, the NSW Government amended the *Environmental Planning and Assessment Act 1979* in 1999 to make 'provision and maintenance of affordable housing' a specific objective of the EP&A Act. The proposed development is consistent with the Objects of the Act as it will provide affordable housing that has been designed to be consistent with the parameters of the local planning controls and environmental legislation. It will make best use of existing urban land and infrastructure and will support the social and economic wellbeing of the Georges River LGA.

8.2.2 Sydney District and Regional Planning Panels

Pursuant to Section 2.15 Functions of Sydney district and regional planning panels of the EP&A Act, a Sydney district or regional planning panel assumes the functions of the consent authority under Part 4 for regionally significant development.

State Environmental Planning Policy (Planning Systems) 2021 (SEPP Planning Systems) includes provisions that identify State and Regionally Significant Development. This SEPP identifies that development carried out by or on behalf of the Crown that has an estimated development cost of more than $5 million is specified as Regionally Significant Development, as per Schedule 6, section 4.

The estimated development cost of the proposed project has been calculated at $25.63M and would be considered Regionally Significant Development for the purposes of a Development Application. The application is therefore required to be referred to, and determined by, the Sydney South Planning Panel.

8.2.3 Evaluation

The relevant matters for consideration under Section 4.15 of the EP&A Act are identified in the following table.

Table 1 Section 4.15 — Matters for consideration

EP&A Act	Matters for consideration
S4.15(1)(a)(i)	SEPP Housing 2021 SEPP Transport and Infrastructure 2021 SEPP Sustainable Buildings 2022 SEPP Biodiversity and Conservation 2021 SEPP Resilience and Hazards 2021 SEPP Planning Systems 2021 Georges River Local Environmental Plan 2021
S4.15(1)(a)(iii)	Georges River Development Control Plan 2021
S4.15(1)(a)(iiia)	Any planning agreement
S4.15(1)(a)(iv)	Any other prescribed matter: AS2601 — 2001: The Demolition of Structures.
S4.15(1)(b)	Likely impacts of the development
S4.15(1)(c)	Suitability of the site for the development
S4.15(1)(d)	Submissions made
S4.15(1)(e)	The public interest

The relevant provisions of these documents and other relevant planning controls are summarised in the following sections of this report.

8.3 Environmental Assessment

This section assesses the proposed development against the relevant legislation, environmental planning instruments, guidelines, and controls. The following Environmental Planning Instruments (EPIs) are relevant to the proposed development:

- State Environmental Planning Policy (Housing) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- Georges River Local Environmental Plan 2021

In addition to the above, the following guidelines and policies apply to the proposed development:

- Georges River Development Control Plan 2021
- The Apartment Design Guide (ADG)

Key requirements of the above listed environmental planning instruments, policies and guidelines are addressed in this section of the report.

8.4 State Environmental Planning Policy (Housing) 2021

The site is located within an 'accessible area' as defined by the Housing SEPP, as it is within 800m walking distance of a public entrance to Riverwood Train Station.

This proposal applies the bonus height and floor space ratios available under Chapter 2, Part 2 Division 1 of the Housing SEPP. Furthermore, Chapter 4 of the Housing SEPP and the Apartment Design Guide (ADG) applies to residential flat buildings with at least 3-storeys and containing 4 or more dwellings.

Therefore, an assessment of the proposal against these requirements is contained in **Table 2** below.

Table 2 Housing SEPP Assessment

Housing SEPP - Chapter 2 Part 2 Development for Affordable Housing	
Division 1 In-fill affordable housing	
Provision	**Compliance**
15C Development to which division applies (1) This division applies to development that includes residential development if — (a) the development is permitted with consent under Chapter 3, Part 4, Chapter 5 or another environmental planning instrument, and	The proposed development is for a residential flat building (RFB), which is a permissible use in the R4 Zone under the GR LEP 2021.
(b) the affordable housing component is at least 10%, and	100% of the GFA of the proposed development will be used for the purposes of affordable (social) housing.
(c) all or part of the development is carried out — (i) for development on land in the Six Cities Region, other than in the City of Shoalhaven or Port Stephens local government area — in an accessible area, or (ii) for development on other land — within 800m walking distance of land in a relevant zone or an equivalent land use zone.	The land is located within the Six Cities Region and is located within an accessible area.
(2) Affordable housing provided as part of development because of a requirement under another chapter of this policy, another environmental planning instrument or a planning agreement is not counted towards the affordable housing component under this division. (3) In this section — ***relevant zone*** means the following — (a) Zone E1 Local Centre, (b) Zone MU1 Mixed Use, (c) Zone B1 Neighbourhood Centre, (d) Zone B2 Local Centre, (e) Zone B4 Mixed Use.	N/A

Housing SEPP - Chapter 2 Part 2 Development for Affordable Housing	
17 Additional floor space ratio for relevant authorities and registered community housing providers (1) This section applies to residential development to which this division applies that is carried out— (a) by or on behalf of a relevant authority or registered community housing provider, and (b) on land with a maximum permissible floor space ratio of 2:1 or less.	Pursuant to Schedule 10 of Housing SEPP, Homes NSW (LAHC), is a relevant authority. The FSR for the land is 1:1 under GR LEP 2021
(2) The maximum floor space ratio for the development is— (a) the maximum floor space ratio calculated in accordance with section 16, or (b) the maximum floor space ratio calculated in accordance with subsection (3). (3) The maximum floor space ratio for subsection (2)(b) is the maximum permissible floor space ratio for the land plus an additional floor space ratio of— (a) if the affordable housing component is at least 50%—0.5:1, or (b) if the affordable housing component is between 20% and 50%—Y:1, where— AH is the affordable housing component. Y is AH ÷ 100	The proposal is for 100% affordable housing. Therefore, an additional FSR of 0.5:1 is applicable. The maximum permissible FSR is therefore 1.5:1. The development proposes an FSR of 1.16:1.
(4) If development to which this section applies uses the maximum floor space ratio under subsection (2)(a), section 16(3) also applies to the development.	Section 18 applies to the development in this instance given that the proposal uses the maximum FSR under (3)(a).
18 Affordable housing requirements for additional building height (1) This section applies to development that includes residential development to which this division applies if the development— (a) includes residential flat buildings or shop top housing, and (b) does not use the additional floor space ratio permitted under section 16.	The proposed development is for the purposes of a residential flat building and does not use the additional FSR under Section 16.
(2) The maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the land plus an additional building height of up to 30%, based on a minimum affordable housing component calculated in accordance with subsection (3). (3) The minimum affordable housing component, which must be at least 10%, is calculated as follows— *affordable housing component = additional building height (as a percentage) ÷ 2*	The maximum permitted height under GR LEP 2021 is 12m. The minimum affordable housing component exceeds 15%, therefore the full bonus of 30% additional height applies to the development. The maximum permitted building height is therefore 15.6m. The proposed building height is 14.85m measured from RL 38.85 to RL24.00.
19 Non-discretionary development standards—the Act, s 4.15	Noted. The provisions of section 19 apply to the development.

Housing SEPP - Chapter 2 Part 2 Development for Affordable Housing	
(1) The object of this section is to identify development standards for particular matters relating to residential development under this division that, if complied with, prevent the consent authority from requiring more onerous standards for the matters. Note— See the Act, section 4.15(3), which does not prevent development consent being granted if a non-discretionary development standard is not complied with.	
(2) The following are non-discretionary development standards in relation to the residential development to which this division applies—	
(a) a minimum site area of 450m²,	The resultant site area (post-dedication of land) is approximately 2,805m^2.
(b) a minimum landscaped area that is the lesser of—	
(i) 35m² per dwelling, or	Therefore, the minimum required landscape area is 30% (841.5m^2) of the site area, as the lesser. 43% has been provided (1215m^2).
(ii) 30% of the site area,	
(c) a deep soil zone on at least 15% of the site area, where—	
(i) each deep soil zone has minimum dimensions of 3m, and	N/A as per subclause (3). Refer to ADG assessment below.
(ii) if practicable, at least 65% of the deep soil zone is located at the rear of the site,	
(d) living rooms and private open spaces in at least 70% of the dwellings receive at least 3 hours of direct solar access between 9am and 3pm at mid-winter,	N/A as per subsection (3). Refer to ADG assessment below.
(e) the following number of parking spaces for dwellings used for affordable housing—	100% of the dwellings are used for affordable housing.
(i) for each dwelling containing 1 bedroom—at least 0.4 parking spaces,	Therefore, the total amount of parking spaces required is 19, as follows:
(ii) for each dwelling containing 2 bedrooms—at least 0.5 parking spaces,	22 1-bed X 0.4 = 8.8 20 2-bed X 0.5 = 10
(iii) for each dwelling containing at least 3 bedrooms—at least 1 parking space,	19 spaces have been provided, including 5 accessible spaces.
(f) the following number of parking spaces for dwellings not used for affordable housing—	N/A - 100% of the dwellings are used for affordable housing.
(i) for each dwelling containing 1 bedroom—at least 0.5 parking spaces,	
(ii) for each dwelling containing 2 bedrooms—at least 1 parking space,	
(iii) for each dwelling containing at least 3 bedrooms—at least 1.5 parking spaces,	
(g) the minimum internal area, if any, specified in the Apartment Design Guide for the type of residential development,	Complies – refer to s148 below.
(h) for development for the purposes of dual occupancies, manor houses or multi dwelling housing (terraces)—the minimum floor area specified in the Low Rise Housing Diversity Design Guide,	N/A. Development is for the purposes of an RFB.
(i) if paragraphs (g) and (h) do not apply, the following minimum floor areas—	N/A.

Housing SEPP - Chapter 2 Part 2 Development for Affordable Housing	
(i) for each dwelling containing 1 bedroom — 65m², (ii) for each dwelling containing 2 bedrooms — 90m², (iii) for each dwelling containing at least 3 bedrooms — 115m² plus 12m² for each bedroom in addition to 3 bedrooms.	
(3) Subsection (2)(c) and (d) do not apply to development to which Chapter 4 applies.	Noted. Chapter 4 applies to the development. Refer to s148 below.
20 Design requirements (1) Development consent must not be granted to development for the purposes of dual occupancies, manor houses or multi dwelling housing (terraces) under this division unless the consent authority has considered the Low Rise Housing Diversity Design Guide, to the extent to which the guide is not inconsistent with this policy. (2) Subsection (1) does not apply to development to which Chapter 4 applies. (3) Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the residential development is compatible with — (a) the desirable elements of the character of the local area, or (b) for precincts undergoing transition — the desired future character of the precinct.	Subsection (1) does not apply as the development is for the purposes of an RFB. The subject site is zoned for high density residential development and the proposal is congruent with the applicable zoning and the existing surrounding development. The proposed scale of development is envisioned for this part of Riverwood by the GRLEP 2021, which is in a highly accessible precinct serviced by rail and bus public transport services and is in close proximity to the services and facilities of the Riverwood Town Centre.
21 Must be used for affordable housing for at least 15 years (1) Development consent must not be granted to development under this division unless the consent authority is satisfied that for a period of at least 15 years commencing on the day an occupation certificate is issued for the development — (a) the development will include the affordable housing component required for the development under section 16, 17 or 18, and (b) the affordable housing component will be managed by a registered community housing provider. (2) This section does not apply to development carried out by or on behalf of the Aboriginal Housing Office or the Land and Housing Corporation.	N/A as per subsection (2). The development is carried out by or on behalf of Homes NSW (formerly LAHC).
22 Subdivision permitted with consent Land on which development has been carried out under this division may be subdivided with development consent.	Noted.

Housing SEPP – Chapter 4 Design of residential apartment development	
144 Application of chapter (2) This chapter applies to the following — (a) development for the purposes of residential flat buildings,	Development is for the purposes of an RFB
(3) This chapter applies to development only if — (a) the development consists of —	Development is for the purposes of an RFB that is 4 storeys and contains 42 dwellings.

(i) the erection of a new building, or (ii) the substantial redevelopment or substantial refurbishment of an existing building, or (iii) the conversion of an existing building, and (b) the building is at least 3 storeys, not including underground car parking storeys, and (c) the building contains at least 4 dwellings.	
145 Referral to design review panel for development applications (1) This section applies to a development application for residential apartment development, other than State significant development. (2) Before determining the development application, the consent authority must refer the application to the design review panel for the local government area in which the development will be carried out for advice on the quality of the design of the development.	Noted.
147 Determination of development applications and modification applications for residential apartment development (1) Development consent must not be granted to residential apartment development, and a development consent for residential apartment development must not be modified, unless the consent authority has considered the following — (a) the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set out in Schedule 9, (b) the Apartment Design Guide, (c) any advice received from a design review panel within 14 days after the consent authority referred the development application or modification application to the panel. (2) The 14-day period referred to in subsection (1)(c) does not increase or otherwise affect the period in which a development application or modification application must be determined by the consent authority. (3) To avoid doubt, subsection (1)(b) does not require a consent authority to require compliance with design criteria specified in the Apartment Design Guide. (4) Subsection (1)(c) does not apply to State significant development.	Refer to the Design Report at **Appendix I** which addresses the Design Principles. The development has been designed in accordance with the Apartment Design Guide. Noted. The development is not State Significant Development.
148 Non-discretionary development standards for residential apartment development — the Act, s 4.15 (1) The object of this section is to identify development standards for particular matters relating to residential apartment development that, if complied with, prevent the consent authority from requiring more onerous standards for the matters. Note — See the Act, section 4.15(3), which does not prevent development consent being granted if a non-discretionary development standard is not complied with.	Noted.

<table>
<tr><th colspan="2">Housing SEPP – Chapter 4 Design of residential apartment development</th></tr>
<tr><td>(2) The following are non-discretionary development standards —

(a) the car parking for the building must be equal to, or greater than, the recommended minimum amount of car parking specified in Part 3J of the Apartment Design Guide,</td><td>Car parking has been provided in accordance with the non-discretionary development standards in Section 19(2)(e).</td></tr>
<tr><td>(b) the internal area for each apartment must be equal to, or greater than, the recommended minimum internal area for the apartment type specified in Part 4D of the Apartment Design Guide,

<u>ADG requirement:</u>

1. Apartments are required to have the following minimum internal areas:

<table><tr><th>Apartment type</th><th>Minimum internal area</th></tr><tr><td>1 bedroom</td><td>50m²</td></tr><tr><td>2 bedroom</td><td>70m²</td></tr></table></td><td>The proposed development achieves compliance with the minimum internal area Design Criteria as prescribed by Part 4D of the ADG:

<table><tr><th>Apartment type</th><th>Proposed Min. Internal Areas</th></tr><tr><td>1- bedroom</td><td>50m²</td></tr><tr><td>2- bedroom</td><td>71m² – 78m²</td></tr></table></td></tr>
<tr><td>(c) the ceiling heights for the building must be equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide.

<u>ADG requirement:</u>

1. Apartments are required to have the following minimum ceiling heights:

<table><tr><th colspan="2">Minimum ceiling height</th></tr><tr><td>Habitable rooms</td><td>2.7m</td></tr><tr><td>Non-habitable</td><td>2.4m</td></tr></table></td><td>The proposed development achieves compliance with the minimum ceiling heights Design Criteria as prescribed by Part 4C of the ADG by providing minimum 2.7m high ceilings throughout the habitable rooms in the development.</td></tr>
<tr><td>149 Apartment Design Guide prevails over development control plans

(1) A requirement, standard or control for residential apartment development that is specified in a development control plan and relates to the following matters has no effect if the Apartment Design Guide also specifies a requirement, standard or control in relation to the same matter —

(a) visual privacy,

(b) solar and daylight access,

(c) common circulation and spaces,

(d) apartment size and layout,

(e) ceiling heights,

(f) private open space and balconies,

(g) natural ventilation,

(h) storage.</td><td>Noted. Refer to ADG assessment below.</td></tr>
<tr><th colspan="2">APARTMENT DESIGN GUIDE</th></tr>
</table>

Housing SEPP – Chapter 4 Design of residential apartment development	
Communal open space Minimum area equal to 25% (701.25m^2) of the site (minimum 3m dimension). Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (midwinter)	Approximately 932m^2 provided (i.e. 33% of proposed site area). Minimum 3m dimension achieved. Refer to COS diagram on page 29 of the architectural set (**Appendix E).** Over 50% of the principal COS receives over 2 hours direct sunlight on the winter solstice between 9am to 12pm. Refer to pages 27-28 of the Architectural Set.
Deep soil zones Min 7% (196.35m^2) of site area and minimum 6m dimension.	Approximately 814m^2 with minimum 6m dimension. Refer to deep soil diagram on page 29 of the architectural set.
Visual privacy Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows: Up to 12m (4 storeys) Habitable rooms & balconies: 6m Non-habitable rooms: 3m	6m setback provided to all adjoining allotment boundaries (up to 4th storey).
Solar and daylight access Living rooms and private open spaces of 70% of units achieve minimum 2 hours direct sunlight between 9 am and 3pm at mid-winter A maximum of 15% of units receive no direct sunlight between 9am and 3pm at mid-winter	71% (30/42) of residential apartments achieve a minimum of 2 hours solar access to living rooms and private open space at the winter solstice. 16% (7/42) of apartments do not receive direct sunlight between 9am-3pm at the winter solstice. Refer to Section 8.9.5 of this Report where the non-compliance is discussed further.
Natural ventilation At least 60% of apartments are natural cross ventilated in 1st nine storeys	62% (26/42) of residential apartments are cross ventilated.
Ceiling height Measured from finished floor level to finished ceiling level, minimum ceiling heights for apartments and mixed-use buildings are: • Habitable rooms: 2.7m • Non-habitable: 2.4m	Minimum 2.7m habitable ceiling heights provided to all rooms.
Dwelling size Studio: 35m^2 1 bedroom: min 50m^2 2 bedroom: min 70m^2 3 bedroom: min 90m^2 Note: The minimum internal areas include one bathroom only. Additional bathrooms increase the minimum internal area by 5m^2 each.	Minimum 50m^2 and 70m^2 provided to 1- and 2-bedroom apartments, respectively.

Housing SEPP – Chapter 4 Design of residential apartment development	
Private open space Ground floor/podium: Min 15m^2 per unit Min depth 3m Upper floors: 4m^2 per studio 8m^2 per 1 bed unit 10m^2 per 2 bed unit Min Dimension 2m	Minimum areas and dimensions provided to all balconies and ground floor private open spaces.
Common circulation and space Max 8 apartments off a circulation core on single level	Each level is divided into two corridors. Each corridor provides access to a maximum of 6 apartments (west) and 5 apartments (east).
Storage Studio: 4m^3 1 bed: 6m^3 2 Bed: 8m^3 Note: At least 50% of the required storage is to be located within the apartment.	The minimum storage requirements have been provided through a combination of basement & apartment storage.

8.5 Other SEPPs

Table 3 Compliance with other applicable SEPPs

SEPP	Compliance
State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)	The development is immediately adjacent to the T8 Railway Line. A referral to Transport NSW is triggered, and the development will need to comply with requirements under s2.98 and 2.99 of the SEPP. An Acoustic Assessment has been prepared and submitted with the DA to demonstrate compliance with the requirements under s2.100.
State Environmental Planning Policy (Sustainable Buildings) 2022	In accordance with the provisions of the SEPP, a BASIX Certificate has been prepared and is included in the DA submission.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	The development proposes tree removal and thus the provisions of the SEPP related to vegetation clearing do apply. Clause 2.6(1) of this SEPP requires a permit from Council for clearing of vegetation required under the policy. The proposed development seeks the removal of 17 trees located within the development footprint as identified within the Arboricultural Impact Assessment (**Appendix D**). It is noted that only 10 trees require consent for removal, as the remainder (7 trees) are considered exempt species under Council's Tree Management Policy. Tree removal is recommended primarily to accommodate the proposed development especially where encroachment will have an adverse impact on roots and crown for viability and stability of the individual species recommended for removal. Appropriate replacement planting is proposed to offset canopy loss, as shown in the Landscape Plan (**Appendix O).**

SEPP	Compliance
	The site is located within a regulated catchment, namely, the Georges River Catchment, as defined in Part 6.2 of the Biodiversity and Conservation SEPP. When considering the likely impact on the environment of an activity proposed to be carried out in a regulated catchment, the determining authority must consider sections 6.6(1), 6.7(1), 6.8(1) and 6.9(1) of the SEPP. The proposed stormwater mitigation measures have been appropriately designed to satisfy the requirements relating to water quality and quantity (section 6.6) and aquatic ecology (section 6.7), such that the subject development would not result in any unreasonable or undesirable impacts to the catchment. The subject site is not identified as flood prone (section 6.8) and is not located within proximity to recreational land associated with natural waterbodies, watercourses, wetlands or riparian vegetation (section 6.9).
State Environmental Planning Policy (Resilience and Hazards) 2021	The land appears to have been used solely for residential purposes since it was original subdivided and developed around 1955. Given the long-term continuous use of the land for residential purposes, it is unlikely that the site has previously been used for any potentially contaminating uses. If any contaminated material or suspected contaminated material is discovered during the construction processes, then actions consistent with the legislative requirements and guideline document will be considered for the safe removal of any contaminated material. It is anticipated that an unexpected finds condition would be included in the conditions of consent.

8.6 Local Planning Controls

8.6.1 Georges River Local Environmental Plan 2021

The site is zoned R4 High Density Residential under the *Georges River Local Environmental Plan 2021* (GR LEP 2021) (**Figure 20**). The proposed development is defined as a residential flat building (RFB) which is permitted with consent in the R4 zone under the CB LEP 2023.

The objectives of the R4 zone as set out in GR LEP 2021 are as follows:

- *To provide for the housing needs of the community within a high density residential environment.*
- *To provide a variety of housing types within a high density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To enable other land uses that contribute to the vibrancy of the neighbourhood while ensuring that business centres remain the focus for business and retail activity.*
- *To encourage development that maximises public transport patronage and promotes walking and cycling.*

The proposed development is consistent with the objectives of the R4 zone in that it will deliver much needed affordable housing for the local community, whilst maintaining the amenity of the

surrounding area through careful design and site planning. The development also includes a variety of housing types within a high density residential environment, including adaptable and silver level liveable housing, and a unit mix that is consistent with the demand for affordable housing in the area.

The development provides a suitable visual transition between the site and surrounding properties through compliant building separation and by providing articulation and architectural design features which will assist in minimising visual and privacy impacts. Deep soil landscaped areas, in excess of that required under the ADG, are provided at side and rear boundaries which will assist in establishing 'green corridors' between the site and neighbouring properties.

The site is ideally positioned, being in close walking distance of public transport services (rail and bus) and the shops and services available in the Riverwood town centre located approximately 300m southwest of the site. The proposal also incorporates the dedication of a pedestrian through-site link to Phillip Street Reserve which will encourage walking and physical activity. Bicycle parking is provided within the basement (19 spaces) to promote cycling activities for residents).

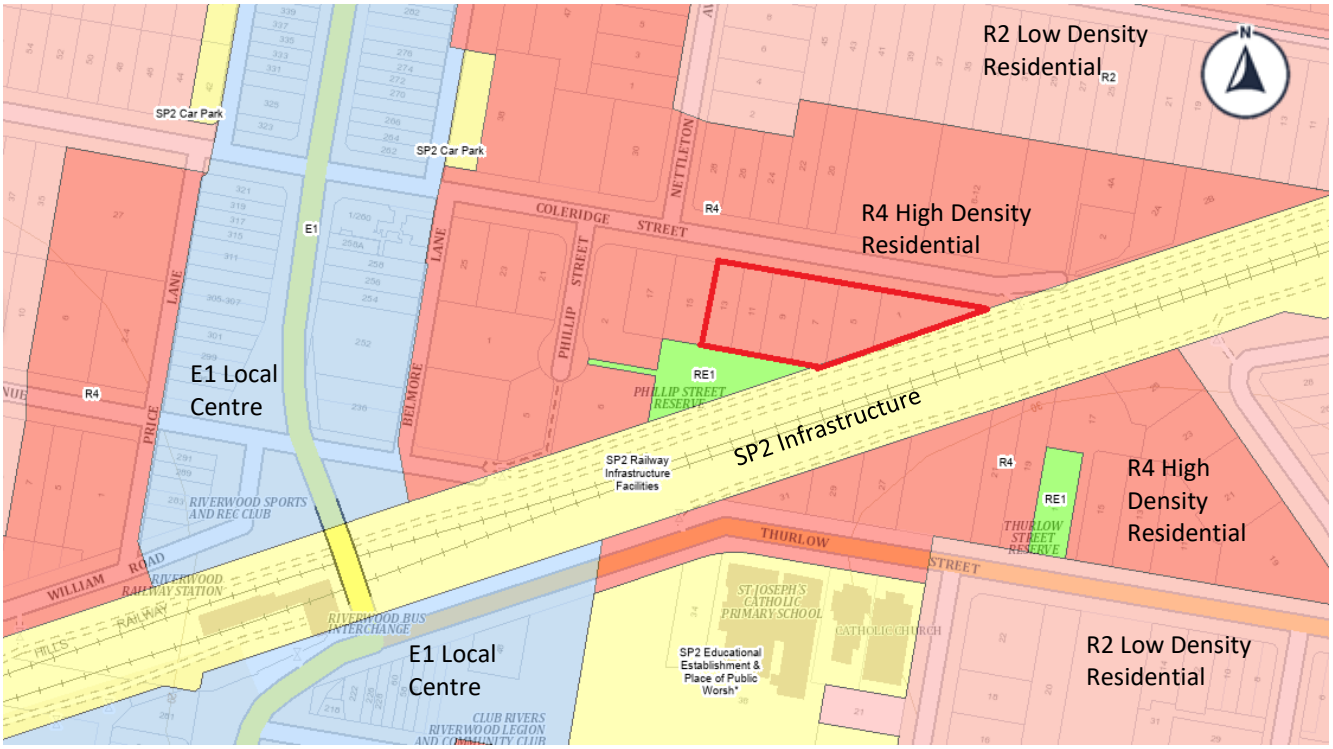

Figure 20 Georges River LEP 2021 zoning (site outlined in red). Source: e-Planning Spatial Viewer, November 2024.

The key development standards relevant to the proposal are tabulated in **Table 4** below.

The proposal will exceed the maximum height and FSR controls under the GR LEP 2021, however the proposal relies on the additional height and FSR bonuses available under the Housing SEPP.

Table 4 Georges River LEP 2021 compliance check

Control	Compliance
Cl 4.3 Height of buildings 12m 15.6m available as per s18 of the Housing SEPP.	Maximum height proposed is approximately 14.85m, measured centrally from the top of the lift overrun RL38.85 to the existing ground level RL24.00. The development has been designed in accordance with the Apartment Design Guide and delivers a high level of amenity for residents of both the proposed development, and existing and future developments on neighbouring sites. Further to the above, the LEP building height exceedance allows for additional affordable housing apartments on the site. These additional dwellings will directly contribute to reducing the waitlist for affordable housing within the Georges River Local Government Area without unreasonably impacting the amenity of neighbouring properties or creating an undesirable precedence for future development in Coleridge Street.
Cl 4.4 Floor Space Ratio (FSR) 1:1 (2911m^2) 1.5:1 available, Additional 0.5:1 as per s17 of the Housing SEPP.	The development proposes an FSR of approximately 1.16:1, in accordance with the floor space ratio bonuses available pursuant to Section 17 of the Housing SEPP. Although permissible, this represents a breach of the LEP maximum floor space ratio development standard. Despite the variation to the LEP FSR, the requirements relating to solar access, cross-ventilation and communal open space are achieved. Large areas of deep soil landscaping which exceed the minimum requirements under the ADG are incorporated at side and rear boundaries, creating 'green corridors' between existing landscaped areas on adjoining properties.
Cl 6.2 Earthworks	The detailed survey shows that the site has a gentle cross fall toward the street from a high point of RL 27.31m at the northeast corner to a low point of RL 23.09m at the north western boundary. A single storey basement is proposed in connection with the development, with a maximum excavation of approximately 4m at the eastern side. A Geotechnical Investigation has been prepared to inform the design of the development and is available at **Appendix N.** The site conditions are considered appropriate for the proposed excavation and the proposed earthworks are not envisioned to result in any detrimental impacts to the surrounding properties.
Cl 6.3 Stormwater Management	The proposed stormwater arrangement has been designed in consideration of Council's stormwater policy and the provisions of Georges River DCP 2021. The development has been designed to maximise the amount of permeable surfaces with approximately 1221m^2 (43.5%) of the site being dedicated to soft soil landscaping and 814m^2(29%) to deep soil zones. Further, an on-site detention tank has been provided to manage stormwater at the site, as well as a 5000L rainwater tank for the purposes of landscape irrigation.
Cl 6.10 Design Excellence **(5) In considering whether the development exhibits design excellence, the consent authority must have regard to the following matters—** **(a) whether a high standard of architectural design, materials and**	The proposed development is of high architectural character and exhibits design excellence. A high standard of architectural design has been achieved through the implementation of highly articulated facades and a brick materiality juxtaposed with darker metal cladding in recessed portions.

Control	Compliance
detailing appropriate to the building type and location will be achieved, (b) whether the form and external appearance of the development will improve the quality and amenity of the public domain, (c) whether the development detrimentally impacts on view corridors, (d) how the development addresses the following matters— (i) the suitability of the land for development, (ii) existing and proposed uses and use mix, (iii) heritage issues and streetscape constraints, (iv) the relationship of the development with other development (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form, (v) bulk, massing and modulation of buildings, (vi) street frontage heights, (vii) environmental impacts such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity, (viii) pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of pedestrian networks,	The overall form and external appearance responds to the elongated nature of the site. The provision of dual pedestrian lobby entries, highlighted by the diverse materiality, ensures that entries are prominent within the streetscape and that a positive interface between the public and private domain is achieved. The development does not impact on any view corridors. There are no site constraints that present a significant barrier to development. The development provides a high quality architectural response to the site's characteristics, and the development maintains general compliance with the relevant planning considerations. The proposed use is commensurate with the applicable R4 High Density Residential zoning that applies to the site. The unit mix has been selected to address the current and future demand for social housing in Riverwood, which is largely for 1 and 2 bedroom units. Larger family homes are provided elsewhere within the social housing portfolio. There are no heritage items or conservation areas within the immediate vicinity of the site. A residential flat building development of this scale is not incongruent with the existing and future development in the area, noting the R4 context of the locality. The proposed development maintains an appropriate setback and separation to the neighbouring property at 15 Coleridge Street, in accordance with the requirements of the ADG and Council's DCP. The solar access of the adjoining property is also maintained, with only slight overshadowing to rear units in the morning of the winter solstice. The overall bulk and massing of the proposal has been reduced through the use of recessed building elements across the façade, coupled with a darker recessive materiality where required. The façade is highly articulated along the street frontage and is not envisioned to be overbearing upon the public domain. The development has been designed such that impacts relating to overshadowing, solar access, visual privacy, wind and reflectivity have been suitably addressed. An acoustic report accompanies the application which details the required mitigation measures given the sites' proximity to the heavy rail line. Further, sustainability initiatives such as solar PV provision and rainwater re-use have been implemented. The development promotes pedestrian and cycle connections through the provision of a through-site link at the site's western boundary and through provision of 19 bicycle parking spaces within the basement. Vehicular and service access to a basement carpark has been provided through a suitably sized vehicular crossover from Coleridge Street and in consideration of AS2890.

Control	Compliance
(ix) the impact on, and proposed improvements to, the public domain, (x) achieving appropriate interfaces at ground level between the building and the public domain,	The development provides a high-quality interface with the public domain through the provision of prominent pedestrian entries and planting of landscaping canopy trees within the front setback.
(xi) excellence and integration of landscape design, (xii) the provision of communal spaces and meeting places,	The development is accompanied by a landscape plan (**Appendix O**) that includes densely planted front, side and rear setbacks. Replacement planting is proposed to offset the loss of trees. Ample opportunities for planting within the communal open space area has been provided which ensures that a seamless integration between the built and natural environment is achieved and that there is sufficient opportunity for communal meeting spaces.
(xiii) the provision of public art in the public domain,	The development does not propose public art.
(xiv) the provision of on-site integrated waste and recycling infrastructure,	The development incorporates rainwater re-use through the provision of a 5000L rainwater tank. Waste recycling is available through Council's waste management stream.
(xv) the promotion of safety through the application of the principles of crime prevention through environmental design.	The development incorporates the principles of crime prevention through environmental design, including passive surveillance of the streetscape, through site link and communal open space through well located living rooms and balconies. Furthermore, the development provides fencing and lighting to discourage antisocial behaviour and improve safety and security of the site.

8.6.2 Georges River Development Control Plan 2021

Georges River Development Control Plan 2021 (GRDCP 2021) contains specific controls for residential development, including RFBs. The key standards relevant to the proposal are assessed in **Table 5** below.

Table 5 Georges River DCP 2021 compliance check

CONTROL	COMPLIANCE
5.1 Riverwood Locality Statement	
Future Desired Character Low density residential suburban, transitioning to a mix of medium and high-density residential character towards Riverwood commercial centre.	The proposed development is consistent with the Riverwood Locality Statement, in that it provides for development that is congruent with the applicable land use zoning as well as the context of the site, being in close proximity to Riverwood commercial centre, Riverwood train station and associated amenities.
Encourage tree planting and landscaping within the front setback space to enhance the existing leafy streetscape character.	The development incorporates landscape forward of the building line, including canopy trees, as well as the retention of most street trees across the frontage of the site, to ensure that the development makes a positive contribution to the landscape context of the locality.
Part 6.3 Residential Flat Buildings and residential components of shop top housing (High Density)	
6.3.1 Minimum Site Requirements	

Minimum lot width: 24m	Complies – 115.35m frontage to Coleridge Street
Minimum lot size: 1000 m^2	Complies – 2,911m^2
6.3.2 Site Isolation and Amalgamation	
Development for the purpose of residential flat buildings or residential components of shop top housing is not to result in the creation of an isolated site that could not be developed in compliance with the relevant planning controls, including the GRLEP 2021 and this DCP.	The proposed development incorporates the amalgamation of remaining undeveloped lots immediately adjacent to one another at this part of Coleridge St, and therefore does not result in the isolation of any lots.
6.3.3 Building Setbacks and Street Interface	
Front setback: 5 m (for building height up to 4 storeys). Above four storeys, the front setback of the upper building levels is to be increased to a minimum of 8m to the street. The minimum 8m setback also applies to balconies, terraces and balustrades and must be accommodated behind the setback. The street setback area is to be predominantly landscaped and a minimum of 2 canopy trees provided (minimum 6m mature height).	Complies – a minimum 5m is provided. N/A – No more than 4 storeys proposed. Front setback area is predominantly landscaped and includes various canopy trees forward of the building line which have a mature height of up to 13m. Refer to the Landscape Plan at **Appendix O**.
Side setbacks: 6 m from ground floor to fourth storey then a greater setback of 9 m is required for upper levels.	Complies – a minimum 6m setback is provided to all side boundaries.
Rear setback: 6 m from ground floor to fourth storey then a greater setback of 9 m is required for upper levels. A reduced side or rear setback may be permitted where permitted by Part 3F of the ADG.	Complies – a minimum 6m setback is provided to the rear boundary.
6.3.4 Basement Setbacks	
Basement setback: Located within the building footprint, or Set back a minimum 6m from front and rear boundaries and 3m from side boundaries. Driveways and crossovers to be located a minimum 1.5m from side boundaries. Basements fronting the primary street address are not to project above existing ground level.	Complies – The basement is located within the building footprint, with a front setback of 5m and rear setback of 6m. The basement is setback a minimum of 3m from the side boundaries, with the driveway and basement ramp setback more than 1.5m. The basement does not project above existing ground level.
6.3.5 Façade Treatment and Street Corners	
Building facades must be clearly articulated and employ high quality materials and finishes that enhance and complement the streetscape character. Development must not rely solely on the use of two-dimensional colour and materials to create visual interest. Modulation and articulation in the building form must be considered in the design of the building, in plan view and elevation. Large areas of blank, minimally or poorly articulated walls are not acceptable. Façade treatments such as	Complies The building's massing is carefully articulated into three main masses, separated by two entry lobbies positioned towards the east and west ends of the building. The middle portion is recessive in nature with its position away from the street facade line and a change in material to reduce the scale of the building to the street. The overall building form is further broken up by recessive elements in the form of building articulation and open balconies, emphasizing the verticality by introducing brick blade walls to the facade, and

wall cladding, and green walls should be considered as alternatives to blank walls. Noise mitigation treatments and design considerations for developments adjoining busy roads or rail corridors, that satisfy the requirements for habitable rooms in accordance with Department of Planning, Industry and Environment's 'Development Near Rail Corridors and Busy Roads – Interim Guideline' and the requirements of Clause 102 (3) of State Environmental Planning Policy (Transport and Infrastructure) 2021 need to be considered.	breaking the facade into several elements to reduce the building length visually. An Acoustic Assessment is available at **Appendix B** which demonstrates that units facing the railway can achieve the required internal noise levels with windows closed. Alternative ventilation will be provided for these units in line with the recommendations of the report.
6.3.6 Landscaped Treatment and Private Open Space	
Landscaped area: Not applicable – the development will be subject to the provisions of the ADG and therefore there is no minimum landscape area under the DCP. Deep soil zone: As per ADG Min 7% of site area, min dimension of 6m. As the site is greater than 1,500m2, a minimum deep soil zone of 15% is encouraged under the ADG.	N/A – refer to ADG requirements in Error! Reference source not found.. Complies – 29% of the site is provided as deep soil.
6.3.7 Communal Open Space	
Communal open space: 25% of the site area with a minimum dimension of 5m	Complies – 33% of the site is provided as communal open space, with a minimum dimension of 5m
6.3.8 Solar Access	
Shadow diagrams are to be submitted for the winter solstice (21 June) to demonstrate impacts at a minimum of 9am, midday and 3pm. Shadow diagrams must include elevational diagrams identifying the habitable rooms and private open space areas of the adjoining dwellings, and view from the sun diagrams, identifying solar access compliance to the proposed development. Shadow diagrams are required to show the impact of the proposal on the sunlight to the open space of neighbouring properties. Existing overshadowing by fences, roof overhangs and changes in level should also be reflected in the diagrams.	The submitted shadow and eye of the sun diagrams demonstrate that any impacts of the proposed development during 9am to 3pm on the winter solstice are within acceptable limits, largely due to the site's north to south orientation, and compliant setbacks, building height and floor space ratio. All adjoining properties maintain sufficient solar access and are not unreasonably overshadowed by the proposed development.
6.3.9 Vehicular Access, Parking and Circulation	
Car parking is to be provided in accordance with the requirements in Part 3 General Considerations of this DCP unless Objective 3J-1 of the Apartment Design Guide applies. Car parking layout and vehicular access requirements and design are to be in accordance with the Australian Standards, in particular AS 2890.1	The parking rates under section 19(e) of the Housing SEPP prevail and have been applied. In this instance, 19 car parking spaces have been provided. A Traffic Impact Assessment is available at Appendix W and X and demonstrates that the proposed development can comply with AS2890.1 19 bicycle parking spaces have been provided.
6.3.10 Dwelling Mix	
Developments of 20 or more dwellings must incorporate a mix of: Studio and 1-bedroom apartments: Maximum 25% 2-bed apartments: Minimum 35% 3-bed apartments: Minimum 15%	Does not comply. No 3-bedroom apartments will be provided as part of the development. The proposed unit mix, comprising 1 and 2 bedroom units, has been determined through an analysis of social housing demand and Homes NSW's housing portfolio in the area. The development is seeking to address the areas of most demand for affordable (social) housing within Homes NSW's

	portfolio, which is for 1 and 2-bedroom dwellings. Homes NSW provides other dwelling typologies that can accommodate the needs of larger family households. The proposed dwelling mix is considered to best meet the needs of applicants on the waiting list, as well assisting Homes NSW with realigning its housing stock to match demand.
6.3.11 Adaptable Housing	
The minimum number of adaptable units designed in accordance with AS4299 – 1995 Adaptable Housing must be incorporated into the developments included in this section: v. 41-50 units – 5 adaptable units	Complies – the proposed development provides 5 adaptable units.
6.3.12 Universal Design	
Developments achieve a benchmark of 20% of the total apartments incorporating the Liveable Housing Guideline's silver level universal design features.	Complies – the proposed development provides 100% of units to meet silver level design standards.

8.7 Planning Agreements

No Planning Agreements are applicable.

8.8 Any Matters Prescribed by the Regulations

For the purposes of Section 4.15(1)(a)(iv) of the EP&A Act, Clause 62 of the EP&A Regulations specifies the additional matters a consent authority must take into consideration when determining a DA. Given that the development does not proposed demolition, there are no additional matters under Clause 62 that apply to the development.

8.9 Likely Impacts of the Development on the Natural and Built Environment

Any other impacts not already discussed, including the likely impacts of the development, and environmental impacts on both the natural and built environments, and social and economic impacts in the locality, are discussed below:

8.9.1 Access, Transport and Traffic

Samana Blue Engineering have prepared a Traffic Impact and Parking Assessment report (**Appendix W**), which finds that there will be no adverse traffic impacts to the local road network because of the development, noting that the development results in a slight increase of 0.24% additional vehicle trips per day within the surrounding road network.

The development itself will provide 19 car parking spaces, including 5 accessible car parking spaces and 19 bicycle racks, which will be accessible via the combined entry and exit driveway located on Coleridge Street. The proposed number of car parking spaces satisfies the non-discretionary development standards found in Section 19(2)(e) of the Housing SEPP, as the development proposes affordable housing within an accessible area in the 'Six Cities Region' (19 spaces required, 19 provided).

An assessment of the car park layout, including the proposed parking spaces and associated aisle width, indicate the car park layout is generally complaint with the relevant applicable standards (AS2890.1 – 2004 and AS2890.6 – 2009).

8.9.2 Heritage

An Aboriginal Heritage Information Management System (AHIMS) search, dated 21 November 2024 (refer **Appendix C**) has not found any record of Aboriginal Sites or Places on the site or in the surrounding locality. Consideration of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* determines that no additional investigation is warranted.

No cultural heritage items have been identified in the Section 10.7 (2) & (5) Planning Certificates and the likelihood of any heritage relics being discovered during excavation/construction is minimal, given the disturbed nature of the site, and long-term residential use of the land. Furthermore, a search of the Department of Climate Change, Energy, the Environment and Water Heritage Database and the Department of Premier and Cabinet's State Heritage NSW Inventory revealed the site does not contain any Commonwealth, Local or State Heritage Items nor is it located within a heritage conservation area.

Should any relics be discovered during development activities, those activities will stop with the appropriate regulatory authority notified of the discovery.

8.9.3 Resources

The proposed development will not result in any significant depletion or degradation of natural resources. The proposal has been designed to meet water and energy efficiency targets as demonstrated by the BASIX certificate for the proposal (refer to **Appendix F**). Additionally, the development achieves an average NatHERS (Nationwide House Energy Rating Scheme) star rating of 8.0. NatHERS provides homes with a star rating out of ten based on an estimate of a home's potential (heating and cooling) energy use (refer to **Appendix P** and **Appendix Q**). Homes with a higher star rating are considered more thermally comfortable and cheaper to run than homes with a lower star rating. The redevelopment of the site will make efficient use of existing land resources and infrastructure and the proposed development will provide contemporary housing that will satisfy current State Government environmental sustainability requirements, particularly through improved energy and water efficiency. The development will also incorporate photovoltaic solar panels located on the rooftop to improve the development's energy use. These factors will ensure reduced depletion and degradation of natural resources in the long term.

8.9.4 Privacy

The proposed development has been designed to maintain visual privacy to adjoining properties and within the development. Design solutions to ensure visual privacy within the development and to adjoining properties would be maintained include:

- Compliant building separation distances noting the ADG requirements;
- offsetting balconies and windows from others within the development and in adjoining properties;
- the orientation of windows and balconies toward the road frontage or adjoining public reserve, away from neighbouring properties where possible; and
- provision of appropriate fencing, privacy screens, highlight windows and landscaping.

8.9.5 Solar Access

The proposed development has been designed to maximise direct sunlight access in midwinter. The development achieves ADG requirements for direct solar access, with 71% of the dwellings

achieving at least 2 hours direct solar access to living areas and private open spaces between 9am – 3pm mid-winter, as required in part 4A-1 of the ADG.

It is noted that approximately 16% of apartments (7/42 units) experience no direct solar access between 9am and 3pm in midwinter, which represents a minor departure to the provisions of the ADG (not more than 15%). Notwithstanding the departure, the proposal is considered acceptable for the following reasons:

- The proposal generally provides a high level of occupant amenity where apartments have been largely orientated to the north, east and west facades of the building. North facing apartments are in full sun from 9am-3pm on the winter solstice, and east-west facing apartments are generally exceeding the minimum 2-hour requirement,
- The departure is a result of the site's irregular elongated shape and north to south orientation, and
- the departure is negligible (1%) and compliance in this instance would be unreasonable and overly onerous. The development provides a yield commensurate with the site's zoning and will make a valuable contribution to addressing urgent housing demand for vulnerable social housing tenants within the Riverwood allocation zone.

8.9.6 Overshadowing

The Shadow Diagrams in **Appendix E** (excerpts below in **Figure 21** to **Figure 23**) have modelled the overshadowing impacts to the adjoining properties. The shadow diagrams demonstrate that the adjoining properties will receive greater than 3 hours of mid-winter solar access to their principal private open space areas.

It is noted that the proposed development will result in some overshadowing of the eastern façade of 15 Coleridge at 9am on the winter solstice, however by 10am the neighbouring building is in full sun.

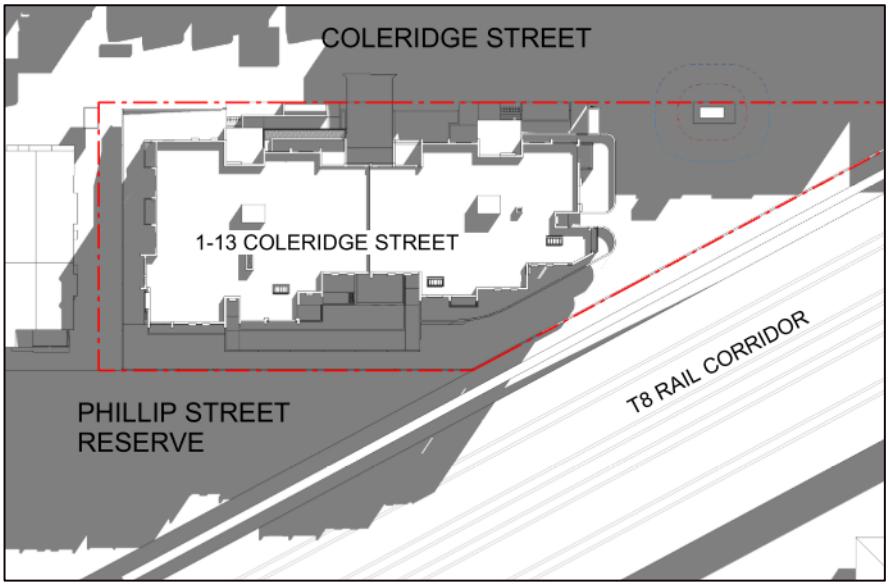

Figure 21 Excerpt from the Architectural Plans – Shadow diagram at 9am midwinter (Source: WMK Architecture)

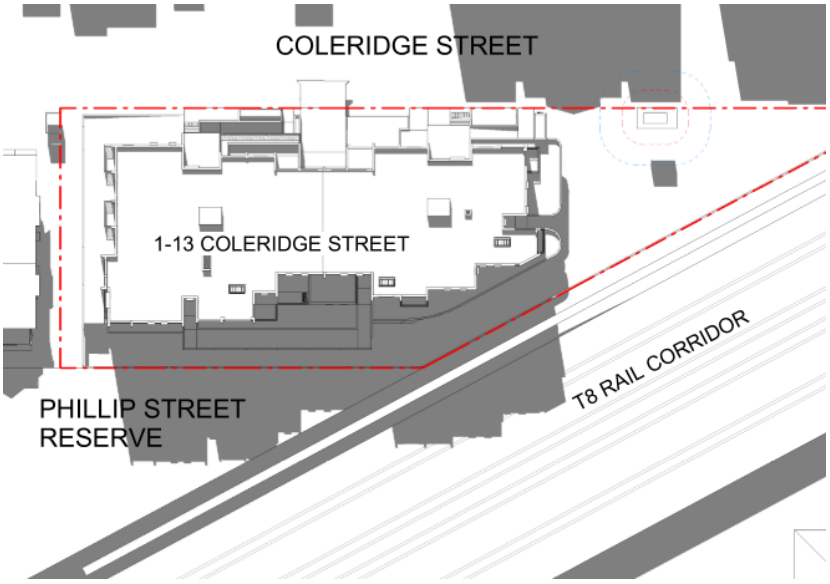

Figure 22: Excerpt from the Architectural Plans – Shadow diagram at 12pm midwinter (Source: WMK Architecture)

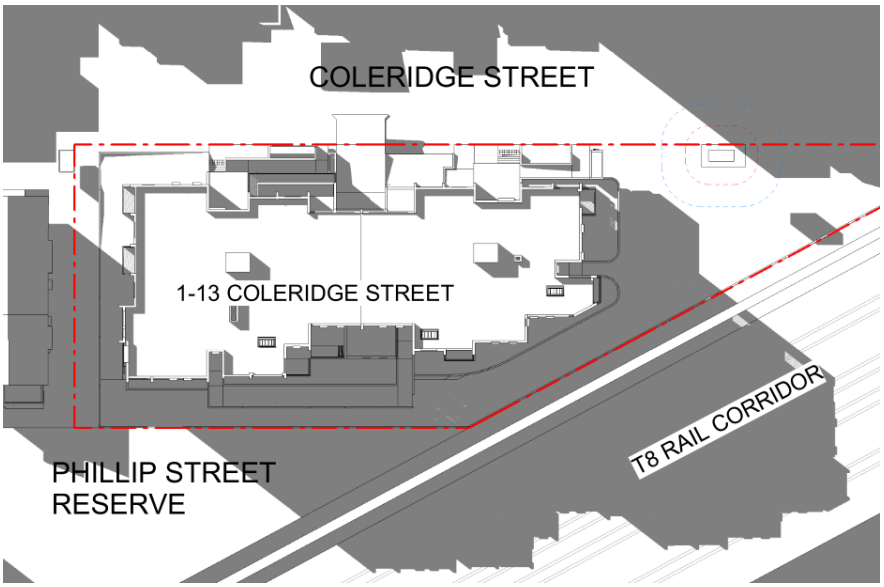

Figure 23: Excerpt from the Architectural Plans – Shadow diagram at 3pm midwinter (Source: WMK Architecture)

Given the envisioned built form for the site and broader locality, it is considered that the proposed development provides acceptable solar access to the adjoining properties.

It is therefore demonstrated that solar access to surrounding properties will not be unreasonably reduced by the proposed development.

8.9.7 Soils

Soil erosion and sediment control measures have been designed in accordance with the guidelines set out in the *Blue Book Managing Urban Stormwater: Soils and Construction* (4th edition, Landcom, 2004). All soil erosion and sediment control measures required to be put in place prior to the commencement of construction works will be maintained during the entire period of the works until disturbed areas are restored by turfing, paving or revegetation.

Refer to the Civil Drawings in **Appendix X**, for specific details.

Acid Sulfate Soils

The GRLEP 2021 Acid Sulfate Soils Map does not identify the subject site as being affected by Acid Sulfate Soils (ASS).

Site Classification (AS2870)

STS Geotechnics, consulting geotechnical engineers was engaged to provide a Geotechnical Investigation, which can be found in **Appendix N.** The report found that only minor groundwater seepage was encountered during the investigations and in accordance with AS2870 the site has a classification of "Class P", which is attributed to abnormal moisture conditions and soil composition. It also notes that, subject to adopting the geotechnical recommendations, the designing engineer may design to a "Class H2" site classification.

8.9.8 Air Quality

Temporary and localised air quality impacts including dust, smoke, grit, odours, and fumes could arise during the clearing and excavation of the site and construction of the proposed development.

Appropriate mitigation measures will be put in place to ensure any potential impacts are minimised, including site watering or damp cloth fences, requiring all vehicles transporting loose materials and travelling on public roads to be secured (i.e., closed tail gate and covered) to minimise dust generation. Any spraying of paint and other materials with the potential to become air borne particulates will only be undertaken in light wind conditions.

8.9.9 Flora and Fauna

The site is not identified as containing any mapped areas of biodiversity sensitivity, Biodiversity Values or Critical Habitat.

An Arboricultural Impact Assessment (Arborist Report) has been prepared by Creative Planning Solutions (**Appendix D**). The Arborist Report considers 34 trees: 16 trees within the site; 3 trees in the adjacent property to the west, 5 trees in the rail reserve and public open space to the south and 10 trees within the road reserve. Refer to Section 3.6 of this report for commentary on the proposed tree removal and retention.

More appropriate tree plantings will be provided as part of the comprehensive landscaping scheme proposed for the site specifically designed to compensate for the loss of the trees to be removed. The landscaping scheme includes the provision of numerous advanced/ mature tree and shrub plantings across the site. Refer to the landscape plan in **Appendix O.**

8.9.10 Waste

Demolition

The development does not propose demolition as the subject site is currently vacant.

During Construction

The construction contract for the buildings and landscaping will specify the following requirements to be fulfilled by the construction contractor:

- Compliance with statutory obligations;
- Separate removal of any hazardous materials as per NSW EPA requirements and Guidelines;
- Removal and disposal of asbestos or other contaminants in accordance with applicable regulations;
- Collection, containment and removal of general building waste, food scraps and similar materials; and

- Collection, containment and removal of recyclable materials such as cardboard, scrap plasterboard, masonry, metals and plastics.

During Occupation

General waste has been calculated based on Council's DCP and the EPA's 'Better practice guide for resource recovery in residential developments' and has determined a required volume of 5040L/week of general waste (5 x 1,100L general waste bins), 5040/week of recycling waste (5 x 1,100L recycling bins based on weekly collection) and 4 x 1100L green waste bins. A bulky waste area of 14m^2 and a bin wash zone of 5m^2 has been provided.

It is noted that Council provided advice on 30 January 2023 requesting that the proposal consider implementing either a waste chute system or a bin storage area on each occupied floor. Notwithstanding, Homes NSW as a long-term asset holder and social housing provider seeks to minimise areas within developments that can encourage dumping and result in ongoing maintenance issues.

Accordingly, it is Homes NSW's preference to rely on the ground floor waste room for all servicing requirements. Apartments have been designed such that travel distances to lifts and the waste room have been minimised for all apartments, with a centrally located waste room.

It is proposed to utilise Council's collect and return service, with Council Officers servicing the garbage room via a direct and dedicated pathway to the waste room. Council's collection vehicle will stop on Coleridge Street in front of the development during collection.

Details of the construction and operational waste management phases of the development can be found in the Waste Management Plan at **Appendix Y**.

8.9.11 Noise and Vibration

Construction

Any noise generated during the construction of the development will not exceed the limits specified in the July 2009 Interim Construction Noise Guidelines, published by the Department of Environment and Climate Change.

Construction work will be carried out in accordance with the NSW Interim Construction Noise Guidelines, recommended standard hours of work, being Monday to Saturday 7 am to 5 pm, with no work on Sundays or public holidays.

During Operation

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

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

It is noted that the subject site is located in proximity to the heavy rail line associated the T8 line and Riverwood railway station. An Acoustic Report has been submitted with the DA which outlines measures to be implemented as part of the development to ensure that suitable amenity is provided for future occupants.

8.9.12 Community Need

According to the Parliament of Australia website, housing affordability in Australia has broadly declined since the early 1980s. In 2012, the National Housing Supply Council (NHSC) estimated that there was a deficit of 539,000 affordable rental properties for lower income renters.

Anglicare Australia's annual rental affordability snapshots suggest that the situation for lower income renters remains difficult. The latest Anglicare survey of 69,000 rental properties across Australia, found that at a national level, only 9 properties were affordable for single adults living on Jobseeker income, and only 3 were suitable for a single person living on Youth Allowance. In this context, an increasing number of Australian renter households are experiencing housing stress.

According to the NSW Department of Communities and Justice, affordable housing is housing that is appropriate for the needs of a range of very low to moderate income households and priced so that these households are also able to meet other basic living costs such as food, clothing, transport, medical care and education. As a rule of thumb, housing is usually considered affordable if it costs less than 30 percent of gross household income. The Department's website states that *"In Greater Sydney, low-income rental households are increasing at a faster rate than population growth."*

Social housing is affordable housing provided by the government and community sectors to assist people who are unable to afford or access suitable accommodation in the private rental market. Homes NSW is the largest provider of social housing in Australia and aims to provide housing opportunities for people most in need in our community.

Homes NSW has identified that in the Georges River LGA, the greatest demand for social housing is for studio, 1- and 2-bedroom dwellings. Current waiting times for a 1-bedroom dwelling is 5-10 years, and more than 10 years for a 2-bedroom dwelling. The proposed development has been designed to directly respond to this immediate need.

Therefore, considering the above, it is it is clear that there is a community need for the development, primarily because it provides more, well designed social and affordable housing to the LGA.

8.9.13 Social Impact in the Locality

The proposed development will have several positive community and social effects. The proposed development will:

- assist Homes NSW in meeting its' significant, long-standing and continually growing demand for social housing in the Georges River Council local government and surrounding areas.
- assist Homes NSW in improving the amenity of accommodation for its tenants, by providing new, more appropriate housing.
- improve the environmental sustainability of housing on the site, particularly through improved thermal performance, solar access, natural ventilation, energy and water efficiency.
- assist Homes NSW to grow its social housing portfolio in line with the NSW Government's *Future Directions for Social Housing in NSW*.
- assist Georges River Council to increase the provision of affordable housing in the LGA.

8.9.14 Economic Impact in the Locality

The proposed development is likely to contribute to a range of economic benefits in the Georges River local government and surrounding areas through:

- more efficient use of land resources, existing infrastructure and existing services.
- local sourcing of construction materials where possible,

- promotion of housing affordability, through the expansion of publicly owned social housing.
- the local sourcing of tradespeople and other construction-related professionals, where possible.
- ongoing consumption from new/additional households.
- the reduced maintenance costs of the newer housing.
- savings associated with improved energy and water efficiency.

8.9.15 Cumulative Impacts

The proposed development activity is not likely to have any cumulative environmental impacts which are likely to combine with each other or with impacts of other activities to produce any unacceptable adverse effects for the following reasons:

- the proposed development activity will not result in any adverse cumulative impact when considered in conjunction with any other proposals or developments in the area.
- there will be no synergistic effects of individual project impacts from the proposed development activity when considered in combination.
- there are no known environmental stresses in the area affected by the proposed development activity or likely contribution of the proposed activity to increasing or decreasing those stresses.

8.10 Suitability of Site for the Proposed Development

The suitability of the site for the proposed development has been addressed in the above sections of this report. There are no prohibitive constraints posed by adjacent developments. There does not appear to be any zoning, planning or environmental matters that should hinder the proposed development of the site. In this regard, it can be concluded that the proposal fits into the locality and the site attributes are conducive for the development.

8.11 The Public Interest

The proposed development will provide housing to meet the needs of the community, assisting Homes NSW in meeting its' significant, long-standing and continually growing demand for social housing in the Georges River LGA. The NSW Communities and Justice website details that in October 2024 there were 62,500 households on the waiting list for social housing in NSW. Specifically, in the Riverwood Allocation Zone (CS10), the wait time for social housing is approximately 5-10 years.

The development will also assist in allowing Homes NSW to grow its social housing portfolio in line with the NSW Government's *Future Directions for Social Housing in NSW.*

Furthermore, the development will assist Homes NSW to improve the amenity of accommodation for its tenants, by providing new, more appropriate housing aligning with demand for housing. The development will also improve the environmental sustainability of housing on the site, particularly through improved thermal performance, solar access, natural ventilation, energy, and water efficiency. The development provides a high level of housing diversity through the provision of Silver Level liveable housing and adaptable apartments.

In light of the above, the development is clearly in the public interest.

9 Conclusion

This Statement of Environmental Effects has been prepared to inform a Development Application for an affordable housing development at 1-13 Coleridge Street, Riverwood.

The proposed development will provide much-needed social housing to the Georges River Local Government Area and has been designed in response to local context and preserving the amenity of neighbouring uses. The site is well located to local facilities and public transport and will provide a high level of amenity for future residents.

As discussed throughout this report, the proposed development relies upon additional height and floor space ratio permitted under the Housing SEPP. Given the development is permitted with consent in the zone and is consistent with the zone objectives applying to the land, the proposal is considered worthy of support given the site's proximity to Riverwood railway station and local shops, acceptable bulk and scale, and minimal impact on neighbours in terms of privacy and overshadowing.

The proposed development will deliver a well-designed affordable housing development that provides generous landscaped areas across the site, good solar access, and a high level of amenity for future residents due to proximity to public transport and local services.

Homes NSW welcomes Council's support of the application for the following reasons:

- The proposal is considered acceptable in terms of the provisions of Section 4.15 of the *Environmental Planning and Assessment Act 1979*;
- The proposal satisfies the NSW Government's and Georges River Council's strategic planning objectives;
- The proposal is consistent with the requirements of the Housing SEPP, including the Apartment Design Guide;
- The proposed development will provide housing to meet the needs of the community, assisting Homes NSW in meeting the significant, long-standing and continually growing demand for social housing in the Georges River LGA and surrounding areas;
- The proposed development will not result in any unacceptable adverse environmental impacts; and
- The proposed development is suitable for the site, and its surrounds.

Appendices

Appendix A Access Report

Appendix B Acoustic Report

Appendix C AHIMS Search

Appendix D Arboricultural Impact Assessment

Appendix E Architectural Plans

Appendix F BASIX Certificate

Appendix G BCA Report

Appendix H Solar Access Report

Appendix I Design Report

Appendix J Electrolysis Report

Appendix K EDC Report

Appendix L Rail Risk Assessment Report

Appendix M Structural Report

Appendix N Geotechnical Investigation

Appendix O Landscape Plan

Appendix P NatHERS Summary Certificate

Appendix Q NatHERS Certificates

Appendix R Notification Plan

Appendix S Owners Consent

Appendix T Stormwater Report

Appendix U Stormwater Plans

Appendix V Survey Plans

Appendix W Traffic Impact Assessment

Appendix X Traffic Engineering and Civil Plans

Appendix Y Waste Management Plan