

6 May 2021

Kaitlin McCaffery  
Development Assessment Officer  
City of Canterbury Bankstown Council  
PO Box 8, Bankstown NSW 1885

Attention: Kaitlin McCaffery

Dear Kaitlin

**Response to Request for Information**

**17 – 21 Pennsylvania Road, Riverwood (DA-757/2020)**

This response has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *St George Community Housing* (the Applicant) in response to Council's email dated 23 April 2021 in relation to the above development application (DA-757/2020).

A response to the issues raised in Council's email is detailed in the table at **Attachment A**.

This response has been informed by the Applicant's extensive consultation with Council to understand and respond to the issues raised during the assessment. The key amendments to the proposal and responses include:

- revisions to the landscaping design of the communal open space to improve social interaction and functionality
- design changes to remove protrusion of Building B within the 4 metre setback to Pennsylvania Road
- revisions to the western unit layouts of Building B to improve their design and functionality

The affordable rental housing development will provide an additional 51 units within the Canterbury Bankstown LGA. This will increase the housing supply and diversity within the LGA. The proposal will also provide housing specific development for those in need within an accessible location.

The proposal represents a high quality affordable rental housing development which is consistent with State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development and the Apartment Design Guide.

The design and siting of the proposal is the result of ongoing and extensive consultation with Council prior to the DA lodgement.

We trust that this submission provides all information required to enable Council to finalise its assessment and determine the application.

Please do not hesitate to contact Michael Woodland on 8459 7506 if you wish to discuss any aspect of this submission.

Yours sincerely



Michael Woodland BTP  
Director

Attachments:

Attachment A:	Response to issues raised by Council (Keylan)
Attachment B:	Revised Architectural Plans (DKO)
Attachment C:	Revised Landscape Plan (Inview Design)
Attachment D:	Revised Operational Waste Management Plan (ttm)

## Attachment A

### Response to issues raised by Council

Ref.	Council Issue	Response
1	<p><b>Landscaped Area</b>  <i>The ARH SEPP requires (for social housing providers) 35sqm of landscaped area per dwelling            51 units x 35 = 1785sqm</i></p> <p><i>For non-social housing providers, 30% of the total site area is to be landscaped area            30% of 2,994sqm = 898.2sqm</i></p> <p><i>The proposal currently provides approximately 936sqm of landscaped area.</i></p> <p><i>The control for social housing providers is significantly higher and impacts developments seeking to provide higher densities.</i></p> <p><i>If Council were to consider varying this control and adopt the non-social housing provider rate, the argument would need to be supported by the fact that the community Open space (COS ) is of the required amount and of high value. ( see comment below about the COS )</i></p>	<p>Noted.</p> <p>As addressed in the previous response to Council, Clause 14(c)(i) only applies to social housing providers. Clause 14 of the ARH SEPP is a standard that if met, cannot be used as a reason for refusal. As detailed in the SEE, Clause 14 is not a mandatory development standard. However, when applied to larger high density developments (i.e. the current proposal), it amounts to a significantly higher landscaping requirement than clause 14(c)(ii), which applies to all other developers.</p> <p>The design of the Communal Open Space has been revised to improve social interaction and the space's functionality as detailed in the response below.</p>
2	<p><b>Communal Open Space (COS)</b>  <i>The ADG requires 25% of the site to be COS = 748.5sqm            The applicant states they provide 810sqm.            However, the COS area is dominated by concrete thoroughfares and planter boxes which are not considered to be useable areas of communal open space. The current design of this area does not lend itself to good social interaction, group or individual recreation and activities and does not meet the objectives of the ADG.</i></p> <p><i>The communal open space area needs to be redesigned to address these issues and show an area that is clearly defined and dedicated to useable communal space.</i></p>	<p>The design of the communal open space has been revised to improve social interaction and the space's useability for a range of uses. The revised design is shown in the Revised Architectural Package (Attachment B) and the Revised Landscape Plan (Attachment C).</p> <p>Areas of CoS previously included along Union and Hunter St entrances have now been <b>excluded</b> in the amended plans as requested by Council.</p> <p>The revised layout has been improved by the following key amendments:</p> <ul style="list-style-type: none"> <li>reduced concrete thoroughfares and introduction of a large turf area able to be used for a wide range of recreational and social activities.</li> </ul>

Ref.	Council Issue	Response
	<p><i>Further to this, there are certain areas which are being calculated as COS which are clearly not usable, such as an area along Union St which is a ramp and planter box, and along Hunter Street, see below:</i></p> <p><i>Based on the above, the assessment of COS would equate to 623sqm which is the area in between building A and building B and a small portion along the southern boundary. Therefore, the proposal does not meet the ADG requirement.</i></p> <p><i>The COS area between the two buildings provides a BBQ area and seating which is segregated by the amount of paths and raised planter boxes, which does not promote social interaction. This area should be better consolidated into one main area and should be designed to allowed for a range of activities not just seating and a BBQ area.</i></p> <p><i>This issue was also raised by the SSPP.</i>  <i>The plans were referred to Councils Landscape Architect whose' comments are attached to this email.</i></p>	<ul style="list-style-type: none"> <li>the BBQ area has also been relocated to a more central location to improve passive surveillance and to improve social interaction outcomes.</li> <li>landscaping planter boxes have been reduced and lowered in height, to increase social interaction within the central area</li> <li>planted areas remain adjacent to internal facing apartments to provide visual privacy.</li> </ul> <p>In addition, the following amendments to the proposed amendments are made to the proposed landscape plan that leads to a superior landscaped outcome for both residents and streetscape:</p> <ul style="list-style-type: none"> <li>The principal CoS is co-located with deep soil tree planting along the southern boundary. These deep soil tree plantings serve to increase separation to the adjoining neighbours and create a perimeter around the central communal open space without creating undue shading from the northerly aspect.</li> <li>The proposed Planter walls have been reduced in the street setback landscaped areas as well as in the CoS, with additional planter box details provided to Council</li> <li>The proposed trees are now 75 L pot size</li> </ul> <p>The applicant is committed to ensuring that landscaping is planted and maintained on the site in accordance with the approved Landscape Plan. In this regard, we make the following suggested wording for any future relevant conditions of consent</p> <ul style="list-style-type: none"> <li>All scheduled plant stock shall be pre-ordered, prior to issue of the Construction Certificate relating to landscaping works or 3 months prior to the commence of landscape construction works, whichever occurs sooner, for the supply to the site on time for installation. Written confirmation of the order shall be provided to Council's Landscape Architect, prior to issue of the Construction Certificate pertaining to landscaping works. The order confirmation shall include name, address and contact details of supplier; and expected supply date.</li> </ul>

Ref.	Council Issue	Response
		Finally, we note that the proposal meets the requirement of the ADG and provides 774m <sup>2</sup> of communal open space. A revised Communal Open Space Plan (DA406) is provided at Attachment B which identifies the useable areas that have been included within this calculation.
3	<p><b>Setbacks</b>  <i>Part C4.2.2.3 C2 (b) requires a 4 metre side setback, the bin storage area and portion of the levels above on the northern side of the site encroach within the 4metre side setback and should be re-designed to be to comply with the CDCP 2012.</i></p> <p><i>The subject site is a large corner allotment and each elevation and frontage needs to positively respond to the surrounding streetscapes. Therefore, providing the required setback is important to promote an active frontages and define the street edge.</i></p>	<p>The proposal has been revised to fully comply with the 4 metre setback to Pennsylvania Road. The amended design still provides the required balconies and residential amenity for the units. This is demonstrated within the Revised Architectural Package (Attachment B).</p>
4	<p><b>Building Separation</b>  <i>The ADG requires 6m separation between non-habitable rooms. The southern elevation is the only boundary which has residential development adjacent to it. The other three elevations have frontages to a road. There are a number of windows in the southern elevation which face the adjoining single dwellings</i></p> <p><i>This is an R4 zone and therefore, these sites which currently have single storey dwelling houses are likely to be developed in the future.</i></p> <p><i>Council accepts the applicants argument that these walls could be considered as non-habitable as the windows are opaque and high sill therefore mitigating the privacy impacts. On that basis Council could accept the encroachment.</i></p> <p><i>This design will be maintained and strict conditions may be imposed.</i></p>	<p>The Revised Architectural Package (Attachment B) retains the opaque and high windows as well as screen planting to mitigate any privacy impacts and maintain the effect of the southern elevation as a blank wall.</p>
5	<p><b>Waste</b>  <i>Areas to address with the bin storage area:</i></p>	<p>The Ground Floor Plan (DA201) provided at Attachment B has been revised to include the required 15cm gap and the placement of the bins to allow for the bins to open from the long side.</p>

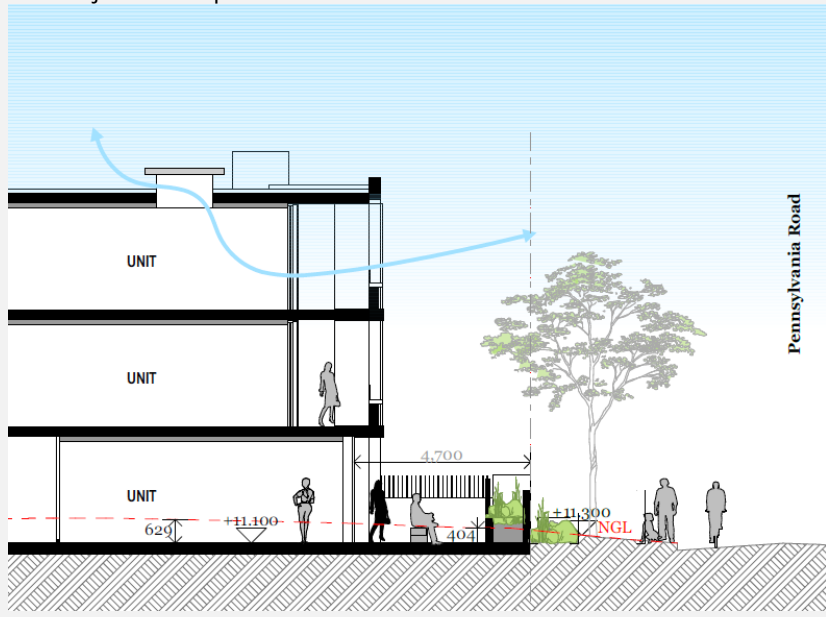
Ref.	Council Issue	Response
	<ul style="list-style-type: none"> <li>660L bins open along the long side, this must be the side pointing outwards for residents to be able to place their rubbish inside the bin.</li> <li>Bins should be separated by at least 15cm gaps to allow for them to be moved into position.</li> </ul>	A revised Operational Waste Management Plan (OWMP) has also been provided at Attachment D.
6	<b>Other</b> <ul style="list-style-type: none"> <li>Need to remove substation along Hunter St from the plans (this is an error as they relocated it, new location is integrated into the building along the Union St frontage)</li> </ul>	The Revised Architectural Package provided at Attachment B has been updated to reflect the relocation of the substation.
7	<ul style="list-style-type: none"> <li>Get more information about the pop up vents and which units are relying on them for solar + ventilation</li> </ul>	<p>DKO has previously prepared a detailed section to demonstrate how natural cross ventilation can be achieved through pop up units. An updated section demonstrating how cross ventilation will be facilitated on the subject site is provided below:</p> 

Figure 1: Pop up window cross ventilation strategy (Source: DKO)

Ref.	Council Issue	Response
		<p>This strategy allows air to flow through living areas of the dwellings with an unobstructed path from positive to negative pressure, this provides for a greater degree of comfort and amenity for occupants.</p> <p>An updated cross ventilation plan labelling the units relying on the pop-up windows for cross ventilation has been provided at Attachment B. The updated SEPP 65 Report provided at Attachment B provides additional detail and explanation relating to the proposed cross ventilation strategy.</p>
8	<ul style="list-style-type: none"> <li>No NGL's put on the elevation and section plans</li> </ul>	Updated sections and elevations with clearly labelled NGL's have been provided within the Revised Architectural Package at Attachment B.
9	<ul style="list-style-type: none"> <li>Unit numbers to be provided on the solar access plans</li> </ul>	The solar calculations plan (DA403) has been updated to include unit numbers and is provided within the Revised Architectural Package at Attachment B.
10	<ul style="list-style-type: none"> <li>Need fire hydrant shown on elevation plans</li> </ul>	The elevation plans have been updated and provided at Attachment B to show and label the location of the fire hydrant.
11	<ul style="list-style-type: none"> <li>The elevation along Union Street for levels 1 and 2 need to provide articulating panels every 6m to 8m in accordance with Part C4.2.3.1, C7, as this is elevation considered the front façade for the development.</li> </ul>	<p>The Union Street façade includes articulation less than every 8m in accordance with the CDCP. The Union Street façade is highly articulated with multiple materials used, a variety of windows incorporated and recessed balconies to provide depth.</p> <p>Several windows on the Union Street elevation were removed due to Ausgrid regulations regarding proximity of windows to the newly introduced substation. This design outcome is the result of Council's requirement to internalise the substation.</p> <p>The design variation along the Union Street façade creates for a high quality design outcome for the entrance to the development, particularly given the constraints created by the internalisation of the substation.</p>