



21 May 2025

OUR REF: EXTERNAL/2024/0010

Tia Mills
NSW Department of Planning & Environment
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Ms Mills,

**Inner West Council Response: SSD-69377980 – Maronite Sisters of the Holy Family –
Village 1 at 194-210 Wardell Road and 46 Pine Street, Marrickville**

Thank you for the opportunity to comment on the proposed redevelopment of The Maronite Sisters of the Holy Family residential care facility, State Significant Development Application (SSDA) in Marrickville. Council had a Pre-SEARS Meeting on 15 October 2024 with Mecone (proponents' consultant) and other representatives involved in this project. The information provided at the meeting, as well as the information available on the NSW Planning Portal has been reviewed by Council. Council in principle supports the redevelopment of the aged care facility to enable it to be brought up to current standards for the residents. The following comments are provided by council officers – not the elected body, and are to be reviewed as part of any re-design process to ensure the development minimises its impact on the locality.

1. Acoustic and Visual Privacy

Concerns were raised in the previous advice provided to the Applicant in November 2024 regarding the location of the communal open space and the potential visual and acoustic impacts to the directly adjoining low-density residential development to the south-west. Although the location of the communal open space remains the same as what was previously proposed, the visual and acoustic privacy implications have been substantially reduced from what was previously proposed by making the following changes:

- Reducing the trafficable floor area/depth of the communal open space area; and
- Increasing the depth of the planter beds, resulting in an increased side setback from the edge of the trafficable communal area to the boundary

It is considered that the substantial depth of the planter beds will considerably minimise overlooking opportunities into neighboring private open space areas and main living

room glazing. In addition, the reduced trafficable depth of the communal open space will also aid in minimising the acoustic visual privacy impacts when utilising this area which is a satisfactory outcome in terms of satisfying O1 and C3(v)(c) of Part 2.6 – Acoustic and Visual Privacy of the Marrickville Development Control Plan 2011 (MDCP 2011). Overall, the efforts made to reduce the visual and acoustic privacy impacts of the proposal as part of this redesign would result in improved outcomes for surrounding residents.

2. Building Design

The following is noted in respect to the proposed building:

- The proposed form of the building is generally understood in terms of the constraints and context of the site, consideration should be given to increasing the side setbacks to the fourth floor. This design change is recommended to further aid in reducing the visual impact and bulk as viewed from neighbouring residences directly adjoining the site;
- The proposal seeks to retain several trees on the site and the proponent indicates that these will assist in screening the new built form. Nevertheless, this is not sufficient justification to support a variation of such magnitude to the Height of Building and Floor Space Ratio Development Standards. The design changes provided within this correspondence are recommended for adoption to ensure the bulk and scale of the proposal is contextually appropriate having regard to lower scale residential development adjoining the site and to reduce the extent of the variations to the Development Standards in question; and
- As discussed under Point 4 of this correspondence, the selected materials and finishes should reflect the materiality of the surrounds, noting the heritage character evident on site, fronting Wardell Road and Marrickville Avenue, as well as the leafy and tree lined context to which the new building will belong.

3. Solar Access and Overshadowing

A preliminary review of the provided Shadow Diagrams indicates the proposal in its current form appears to comply with C2 of Part 2.7 – Solar Access and Overshadowing of the MDCP 2011. Notwithstanding, concerns are still raised regarding the visual bulk and scale of the development proposed as discussed under Points 2 and 4 of this correspondence.

4. Heritage

The following is noted in respect to heritage conservation:

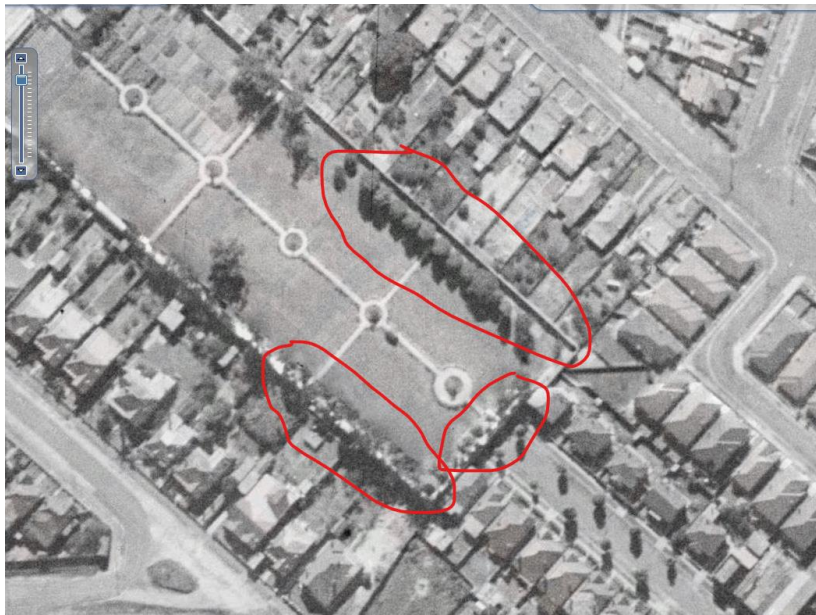
- It is noted that a Conservation Management Plan has not been prepared in accordance with Council's advice provided after the Pre-SEARS meeting in

November 2024. Council still holds the position that this documentation should be provided to assist in the assessment of the proposal. The Conservation Management Plan is to assess all elements currently on the subject site;

- The changes made to the built form and overall scale of the development from the previously reviewed Architectural Plans is appreciated. The existing facility is of a single storey scale and the current proposal is of a four (4) storey scale, that is, the proposed building is of a considerably larger scale than the existing facility, and will appear so when viewed from the adjoining Heritage Conservation Areas. Further efforts are sought to reduce the overall bulk and scale of the development and thus reduce the visual impact when viewed from the adjoining Heritage Conservation Areas. This can be achieved by adopting the following design changes:
 - In-setting the upper levels as outlined under Point 2 of this correspondence; and
 - Ensuring that the floor-to-ceiling heights to the lower (service) levels are kept to a minimum.
- The use of a contrasting colour brick is not in keeping with the overall architectural character of the Heritage Item and is recommended to be modified to be a colour that is more traditional and in keeping with the prevailing streetscape pattern along Marrickville Avenue; and
- A change in the configuration of the gate fronting Marrickville Avenue is acceptable on Heritage grounds provided that the alignment and character of the Heritage boundary wall remains evident.

5. Tree Management

Trees are an important element of the landscape setting, and a number of the buildings contribute to the heritage status of this site. Brushbox trees in particular are significant and early aerial image (below) attests to their contribution at the perimeter and adjacent to the north-eastern section of the boundary wall. Given their significance further information is sought about the reason for the proposed removal of trees and a more detailed landscape plan is required to demonstrate where replanting will occur. This is to ensure the species of trees restore the canopy cover in a manner which is also consistent with the heritage contribution trees have made to this site. Justification of tree removal is required to satisfy the provisions of Part 2.20 – Marrickville Development Control Plan 2011.



Investigation of an alternate location of the electrical kiosk is required in order to mitigate the impact on existing trees along the perimeter.

6. Urban Ecology

The subject site is located in a Terrestrial Biodiversity Area, and therefore, a Biodiversity Impact Assessment will need to be prepared and lodged as part of the 'Response to Submissions' component of the assessment of the SSDA. This is to ensure the adequate protection of local biodiversity within the premises.

7. Stormwater and Water Sensitive Urban Design

The following is noted in respect to stormwater and drainage and Water Sensitive Urban Design:

- The OSD for the site must be designed so as to only allow a maximum discharge of stormwater of 25l/sec to each kerb in Marrickville Avenue during a 1 in 100-year storm event (50l/sec in total);
- Pipe drainage systems for the site shall be designed to cater for the twenty (20) year Average Recurrence Interval (A.R.I.) storm. Major event surface flow paths shall be designed to cater for the one hundred (100) year A.R.I. storm;
- Water Sensitive Urban Design is required and must be provided to meet Council's water quality targets in accordance with the requirements of Part 2.17 – Water Sensitive Urban Design of the Marrickville DCP 2011; and
- The stormwater treatment should include landscaped treatments such as a raingarden.

8. Parking and Traffic

The following is noted in respect to parking and traffic:

- It is noted that the number of staff, ambulance, visitor/resident off-street parking spaces are compliant with the minimum parking spaces required as stipulated



under Clause 107 – Non-Discretionary Development Standards for Hostels and Residential Care Facilities – the Act, s 4.15 of *SEPP (Housing) 2021* which is a satisfactory outcome; and

- Design of the vehicular access and car parking facilities must comply with AS/NZS 2890. 1, AS/NZS 2890. 6: and AS/NZS 2890. 2. It is requested that this be included as a condition on any approval issued for the site.

9. Public Domain Works

The following is noted in respect to any works associated with the public domain:

- Any improvements to the public domain that are adjacent to the site should be in accordance with the Inner West Public Domain Design Guide;
- Vehicle access shall be formalised by the construction of a vehicle crossing and kerb and gutter at the end of Marrickville Avenue;
- The road pavement in Marrickville Avenue is in poor condition and is likely to be damaged by heavy construction vehicles. The full length of the road pavement in Marrickville Avenue shall be repaired and re-sheeted with asphaltic concrete upon completion of the development; and
- A damage bond to an amount of 1% of the cost of works will be required in accordance with Council's fees and charges.

10. Potential Works to Village 2

As part of Council's Pre-SEARS Meeting with the Applicant, it was raised that Village 2 (i.e., fronting Wardell Road) will also be redeveloped / renovated. A review of the Architectural Plans illustrates that this SSDA solely relates to the works at Village 1 (i.e., fronting Marrickville Avenue). As such, clarification is sought regarding the potential works at Village 2 on the subject site.

11. Redevelopment of Both Existing Facilities

In addition to Point 10 of this correspondence, the information provided as part of this subject application does not address the cumulative impact of the redevelopment of both aged care facilities and whether the redevelopment of Village 1 has been reasonably considered with respect to basement and ground floor parking arrangements. Since Village 2 is envisaged to be expanded and / or redeveloped in the near future, appropriate investigations are required under this proposal to consider the associated parking needed to support increased staffing and to support the operations of both expanded aged care facilities on-site.

12. Land Contamination

The Remediation Action Plan (RAP) advises that 'additional data collection and risk assessment is required to establish whether remediation of lead and volatiles (TRH and VOCs) in groundwater is necessary and to address the various data gaps due to access



constraints identified by the PSI'. As such, further investigations, such as a Data Gap Investigation, is to be conducted to satisfy whether remediation is required.

Thank you for the opportunity to provide feedback on the proposed development, which is supported in principle, subject to the above matters being addressed. If you need any further information in relation to the above response, please contact Inner West Council's Assessment Planners:

Angela Berryman - +61 2 9392 5979 or angela.berryman@innerwest.nsw.gov.au

Kaitlyn Attard - +61 2 9392 5483 or kaitlyn.attard@innerwest.nsw.gov.au.

Yours Faithfully,

A handwritten signature in black ink, appearing to read "Simone Plummer". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Director Planning

Simone Plummer