

13 March 2023

Judith Elijah
Senior Planning Officer
State Significant Acceleration
Department of Planning and Environment

Sent via email: Judith.elijah@dpie.nsw.gov.au

Dear Ms Elijah,

**SSD-45024776 – Narwee Parklands Seniors Housing at 59-67 Karne Street North, Narwee
Submission to the State Significant Development Application – Canterbury Bankstown City Council**

Thank you for the opportunity to provide comment in response to the applicant's submission for the State Significant Development (SSD) Application SSD-45024776 for the proposed construction of a Seniors Housing Development at 59-67 Karne Street North, Narwee. This submission is made within the extension due date of 13 March 2021 as granted by Judith Elijah via email on 20 February 2023. Council has reviewed the documentation made available on the Department of Planning and Environment's (Department) website and enclosed with this letter is Council's response to the SSD Application.

Based on our review of the application, Council generally supports the proposed Seniors Housing Development subject to amendments to the proposed design and clarifications. Council's feedback and comments are summarised in Attachment A.

If you require any clarification or have any enquiries regarding the feedback provided, please feel free to contact Hannah Painter, Strategic Planner on (02) 9707 5462 or Hannah.Painter@cbc.city.nsw.gov.au.

Yours sincerely



Patrick Lebon
**Coordinator Strategic Assessments, City Strategy and Design
Canterbury Bankstown Council**

Attachments:

A – Council submission to State Significant Development Application



Attachment A
State Significant Development Application SSD-45024776 – Canterbury Bankstown
Council Submission
59-67 Karne Street North, Narwee

Summary of amendments

- Additional information requested
 - 1) Update landscape plans to include height of trees at maturity, amend species along the southern and eastern boundaries, and to address inconsistencies in the SSD Application documents in relation to tree removal and retention
 - 2) Clearly identify the location, extent and height of all retaining walls required on site. Ensure the retaining walls do not conflict existing on site and street trees and their Tree Protection Zones
 - 3) Update the Flood Impact Assessment with revised peak flow figures, demonstrate the proposal does not worsen flooding conditions and provide a flood emergency evacuation plan
 - 4) Replace the ocean guard pit baskets with a single gross pollutant trap
 - 5) Amend the plans to demonstrate compliance with AS2890.2 and provide swept paths for a Heavy Rigid Vehicle
 - 6) Increase the total bin allocations in line with NSW EPA recommendations
 - 7) Amend the Operational Waste Management Plan to include information regarding water quality devices, and
 - 8) Provide an alternate off site fire egress location. The use of Rickard Podmore Dog Park for fire egress is not supported

Upon receipt of the above information, please refer the application back to Council for review.

- Recommended design and/or plan changes
 - 1) Amend the design to demonstrate compliance with the Seniors Housing Design Guide in relation to; internal amenity, layout, solar access and natural ventilation, architectural expression, landscaping, and transport.
- Recommended conditions of consent and staging
 - 1) The following condition is recommended prior to the issue of a Construction Certificate:

Prior to the execution of works associated with the built form of the development (excluding building work directly related to remediation), a Site Audit Statement is to be obtained from an NSW EPA Accrediated Site Auditor.

The Site Audit Statement must confirm that the site has been remediated in accordance with the approved Remedial Action Plan and that the site is suitable for the proposed use.



Comments

Item	Council Feedback
Landscaping	<p>The landscape plans/documentation should be updated to include the following information:</p> <ul style="list-style-type: none"> • Heights of all trees at maturity in accordance with the Secretary's Environmental Assessment Requirements (SEARs) • Further detail in relation to the proposal's contribution to increased urban tree canopy cover or mitigation of urban heat island effect in accordance with the SEARs • The landscaping along the southern and eastern boundaries should utilise species consistent with the Plant Community Type (PCT) classification 3448 (Castlereagh Ironbark Forest). The landscaping in this area should also be managed under a Vegetation Management Plan prepared by a suitably qualified person (please see Figure 1 below).



Figure 1. Suggested location for PCT 3448 landscaping as shown within the boxed highlighted areas.

The recommendations of the Arboricultural report prepared by Moore Tree Arboricultural Services should be included as conditions in a development consent and must be detailed on Construction Certificate plans. Council has reviewed this document in conjunction with the Architectural and Landscape Plans and note the following inconsistencies:

- Tree 39 is identified on the architectural plans to be located on the street verge to the side of the adjoining property at 84 Grove Avenue, yet the Landscape Plans note it will be in front of the proposed development and removed. The plans should be amended for consistency. Based on a site visit, this tree is located as per the Architectural plans.
- Tree 40 located on Council land is identified in the Arboricultural report and Landscape plans for retention, yet the Architectural plans note it will be



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	<p>removed. This tree should be retained as it provides a positive contribution to the Karne Street North streetscape. Council does not support its removal. As per the provided Arboricultural report (page 2), no excavation should occur within 1m of the tree. The Architectural plans conflict this advice as the tree is within 1m of the proposed driveway. Further clarification is requested to ensure this tree is retained.</p> <ul style="list-style-type: none"> • Tree 41 located on Council land is noted as removed as it had died. This tree must be replaced with a new street tree which needs to be included on the plans. • There is ample opportunity for additional street trees along the site frontage to be planted. Council requests that the revised Landscape plan is submitted showing additional street trees to enhance the streetscape and contribute to increased tree canopy. • It is not clear on the plans if the protection measures recommended under the Arboricultural report can be implemented with the amount of excavation proposed. Please refer to the Excavation issue in this table for more information.
Flooding	<p>As per the flood assessment produced by TTW NSW, the existing peak flow entering from the northern site boundary is up to 190m³/sec in the 1% AEP event (page 10). Yet the PMF event is noted as 2.3m³/sec. A flow of 190m³/sec is considered to be an error as the volumes are too high for this site. The existing peak flood levels should be reviewed and revised with the correct volume figures.</p> <p>Given the above, the proposed development does not adequately demonstrate consistency with the Bankstown Development Control Plan 2015, DES and the NSW Floodplain Development Manual. Moreover, the development will need to demonstrate no worsening of flood conditions as a result of the proposal.</p> <p>It is requested that a development consent condition is included by the Department for a Flood Emergency Management Plan and evacuation routes endorsed by the State Emergency Service (SES) to be provided prior to any Construction Certificate being issued.</p>
Stormwater	<ul style="list-style-type: none"> • Ocean guard pit baskets and pollution control pits are not supported. It is requested a single gross pollutant trap is installed in lieu • If nutrients are being targeted, the preference is for Filterra tree pits to be installed instead of ocean guard pit baskets • If assets are remaining on a private lot and not on Council land, they must be covered by a Section 88b positive covenant in accordance with the <i>Conveyancing Act 1919</i>. • The Stormwater Management Plan contained in Appendix T makes reference to Blacktown Council. This should be amended to refer to Canterbury Bankstown Council. It is noted however, that Blacktown's Water Sensitive Urban Design developer handbook can be used as a technical guide
Waste	<p>The plans need to be amended to clarify the following:</p> <ul style="list-style-type: none"> • The location of the bin collection point must allow for a Heavy Rigid Vehicle (HRV) to enter and exit in a forward direction. All movements must comply with the Australian Standard AS2890.2



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	<ul style="list-style-type: none"> • Demonstrate a HRV can service the site without hindering traffic flow (i.e., the full length of the HRV must be contained within the loading bay while still allowing a 2-metre rear clearance and not be located within the driveway area). • Headroom allowances compliant with AS2890.2 for the entire travel path. • Swept paths need to demonstrate HRV movements in addition to the provided B85 vehicle. <p>Furthermore, the documentation needs to be updated to increase the bin allocation in line with EPA generation rates:</p> <ul style="list-style-type: none"> • 9 x 1,100L bulk garbage bins • 4 x 1,100L bulk recycling bins <p>Both garbage and recycling are to be collected weekly by a private contractor.</p>
Operational Waste Management Plan	<p>The Operational Waste Management Plan does not include details regarding water quality devices. If these are to be maintained privately, they should be included in the supporting documentation. Further detail is required before any development consent is issued.</p>
Site Audit Statement	<p>Council's Environmental Health Officers have raised no concerns subject to the following inclusion as a condition of consent:</p> <p><i>Prior to the execution of works associated with the built form of the development (excluding building work directly related to remediation), a Site Audit Statement is to be obtained from an NSW EPA Accredited Site Auditor.</i></p> <p><i>The Site Audit Statement must confirm that the site has been remediated in accordance with the approved Remedial Action Plan and that the site is suitable for the proposed use.</i></p> <p>Council requests the above condition be included in any future State Significant development consent for this site.</p>
Fire egress	<p>Council does not support access for emergency fire egress onto Richard Podmore Dog Park as this park has a specific managed use so direct access to not appropriate. The applicant should provide alternate off-site locations for fire egress in consultation directly with Council. Council requests this matter is resolved prior to any development consent being issued for the SDD Application.</p>
Excavation	<p>Council acknowledges that in order to achieve accessible levels, a reasonable amount of excavation is required throughout the site including construction of retaining walls. To understand the full height and potential impact of the proposed retaining walls it is requested the Architectural plans are updated to include RLs on the top of all retaining walls and on ground level at the base of all retaining walls.</p> <p>The plans do not clearly identify the locations of the proposed retaining walls in relation to surrounding trees and the building footprint. It is requested that the location of the proposed retaining walls is included on the plans.</p>
Urban Design	<p>The proposed design is generally consistent with the Seniors Housing Design Guide (NSW SEPP November 2022). The Residential Care Facility overall</p>



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	<p>design delivers acceptable quality development outcomes that are responsive to the natural and built form context around the site.</p> <p>Notwithstanding, there are outstanding issues that should be addressed prior to the Department granting development consent to the SSD Application:</p> <ul style="list-style-type: none">• <u>Internal amenity, layout, solar access, and natural ventilation</u> – the applicant should provide cross-ventilation plans to demonstrate compliance with the Seniors Housing Design Guidance 4.1.6 “<i>Design buildings that promote health and have good cross ventilation, access to sunlight and fresh air.</i>” For bedrooms adjoining the driveway, common spaces and/or footpaths, proper visual and acoustic privacy measures should be included.• <u>Architecture expression – Elevation and materiality</u> – the proposal should demonstrate compliance with the Seniors Housing Design Guide for “<i>The Design for physical ageing and dementia</i>”. The proposal should also provide information on the proposed width of the common corridors used by the residents in accordance with the Australasian Health Facility Guidelines (Part C – Design for Access, Mobility, Safety and Security).• <u>Landscaping</u> – the proposal should provide details of non-permeable materials and surfaces included in the open spaces and the deep soil zones.• <u>Traffic and Transport</u> – it is recommended that the proposal provides for adequate bicycle parking spaces to promote sustainable travel choices for employees and visitors.