

Group Homes

Group home (permanent) or permanent group home is defined in the Tweed Local Environmental Plan (LEP) 2014 as *a dwelling*:

- (a) that is occupied by persons as a single household with or without paid supervision or care and whether or not those persons are related or payment for board and lodging is required, and*
- (b) that is used to provide permanent household accommodation for people with a disability or people who are socially disadvantaged, but does not include development to which State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 applies.*

State Environmental Planning Policy (Affordable Rental Housing) 2009 in Subclause 42(2) defines 'people with a disability' and 'socially disadvantaged' as follows:

- (a) a reference to people with a disability is a reference to people of any age who, as a result of having an intellectual, psychiatric, sensory, physical or similar impairment, or a combination of such impairments, either permanently or for an extended period, have substantially limited opportunities to enjoy full and active lives, and*
- (b) a reference to people who are socially disadvantaged is a reference to:*
 - (i) people who are disadvantaged because of their alcohol or drug dependence, extreme poverty, psychological disorder or other similar disadvantage, or*
 - (ii) people who require protection because of domestic violence or upheaval.*

As per the Further Information submitted and specifically the Social Economic Needs Assessment and Social Impact Assessment (SIA) prepared by RPS, it would appear that the development is proposed as social and affordable housing, with 70% of the units to be made available to affordable housing tenants with the remaining 30% to be provided as social housing.

Further, the SIA makes no reference to Group Home(s) or the needs of the categories of persons who could be accommodated in a Group Home.

1. Please demonstrate that this proposal to accommodate 'social and affordable housing' tenants meets the definition of a Group Home as set out in SEPP (Affordable Rental Housing) 2009, and update the SIA accordingly. The SIA should also address the needs of those categories of persons eligible for Group Housing, based on the definition of same.
2. You are requested to submit Further Information to address the issues raised in Item 6, 8, 9, and 10 of the Request for Further Information dated 19 September 2018, in the context of the development being 'Group Homes' as proposed in the application.
3. In responding, to the above you are advised that the previous SIA appears to have misinterpreted the query in relation to arrangements will be made for the continued use of the units as Group Homes after the initial 10 year period with

NCCH. At the expiry of NCCH's agreement to management the development as Group Homes, what arrangements are in place to ensure the continued operation and management of the site as a Group Homes development?

Car Parking

4. There are concerns that the provision of parking on site as proposed would result to adverse impacts on the adjacent road network and demand for on street parking.

The development needs to provide parking commensurate with the Tweed Development Control Plan (DCP) Part A2 for Multi-dwelling housing and needs to comply with Council's requirements in relation to reversing from driveways for other than duplex type dwellings.

Whilst the application is for a Group Home type development, there is insufficient information provided to justify the under provision of car parking as per DCP Part A2 for multi-dwelling housing.

Further information should be provided justifying the reduced parking rates or alternatively you are requested to provide additional car parking as per the requirements for Multi-dwelling housing in DCP Part A2.

Flood Emergency Management Plan

5. Please note that the Flood Emergency Management Plan refers to middle to low income groups and that the medical profile of residents occupying the site would be similar to that of a standard freehold residential community. Given the definition of a Group Home being exclusively for people with a disability or people who are socially disadvantaged (meaning people who are disadvantaged because of their alcohol or drug dependence, extreme poverty, psychological disorder or other similar disadvantage, or people who require protection because of domestic violence or upheaval), this does not appear to be a reasonable assumption.
6. Please confirm the party responsible in the role of 'body corporate'

Earthworks

There appears to be a discrepancy in the bulk earthworks plans in terms of the realignment of the stream/waterway and the interface between the Phase 1 and Phase 2 works, ie Following Phase 1, the realigned stream/waterway does not connect into the existing stream/waterway on the southern portion of the site. Please submit revised plans to address this issue.