

25130

16 June 2026

Emma Butcher
Senior Planner, Housing Delivery Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

Dear Emma,

Response to Submissions | New Residential Community 2 and 2A Bullecourt Avenue (SSD- 97092958)

This Submissions Report has been prepared by Beam Planning on behalf of Mirvac Residential (NSW) Developments Pty Ltd (the Applicant) in relation to the State Significant Development Application (SSDA) (SSD-97092958) for a new residential community located at 2 and 2A Bullecourt Avenue, Milperra (the site).

This Submissions Report, as well as the WSU Response to ToA and RFI comments, is accompanied by:

- **Appendix A** – Submissions Register, prepared by Beam Planning.
- **Appendix B** – Updated Civil Plans, prepared by Beveridge Williams.
- **Appendix C** – Updated Arboricultural Impact Assessment, prepared by Temporal Tree Management.
- **Appendix D** – Updated Biodiversity Development Assessment Report prepared by SLR Consulting.
- **Appendix E** – Updated Vegetation Management Plan, prepared by SLR Consulting.
- **Appendix F** – Updated Flood Impact Risk Assessment prepared by Beveridge Williams.
- **Appendix G** – Updated Civil Engineering Report, prepared by Beveridge Williams.
- **Appendix H** – Updated Traffic Impact Assessment, prepared by TTPP.
- **Appendix I** – Aboriginal Cultural Heritage Assessment Report, prepared by Heritage Now.
- **Appendix J** – Architectural Plans, prepared by Mirvac Design.
- **Appendix K** – Acoustic Report, prepared by Renzo Tonin.
- **Appendix L** – Waste Management Plan, prepared by SLR Consulting.
- **Appendix M** – Updated Landscape Report, prepared by Urbis.
- **Appendix N** – Council Minutes confirming preference to retain the roundabout.
- **Appendix O** – Mount Saint Joseph School preference to retain the roundabout.
- **Appendix P** – DRAINS Model, prepared by Beveridge Williams.
- **Appendix Q** – MUSIC Model, prepared by Beveridge Williams.
- **Appendix R** – Crown Lands Investigation, prepared by InfoTrack.
- **Appendix S** – Plan of Proposed Subdivision, prepared by Beveridge Williams.
- **Appendix T** – Independent Risk Assessment, prepared by PDC Consultants.
- **Appendix U** – Traffic Response to ToA Comments, prepared by TTPP.
- **Appendix V** – Biodiversity Case Studies, prepared by Beveridge Williams.
- **Appendix W** – Addendum Arboricultural Statement, prepared by Temporal Tree Management.
- **Appendix X** – Council Correspondence on Ashford Avenue Traffic Arrangements.
- **Appendix Y** – Traffic Comment on Road 2B, prepared by TTPP.
- **Appendix Z** – Clause 4.6 Request for Variation, prepared by Beam Planning.

1.0 Introduction

In December 2025 the Applicant lodged an SSDA with the Department of Planning, Housing and Infrastructure (DPHI) for the redevelopment of the former Western Sydney University (WSU) campus in the Canterbury Bankstown Local Government Area (LGA), for the staged development of the site for a new residential community.

Specifically, the SSDA sought consent for:

- Stage 1 – Tree removal (where proposed) and remediation of contaminated lands across the site, creation of two (2) super lots and 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 40 residential lots. This stage also involves the construction of 40 dwelling houses within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the ‘Central Park’.
- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre (which will cease operation during Stage 3 works), construction of a new carpark to service the childcare centre and E1 Local Centre zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme for the E1 Local Centre zoned land.
- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the ‘Southern Park’, all to be dedicated to the Council.
- Stage 5 – Creation of six (6) super lots and construction of new roads and civil works.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the ‘Northern Park’, all to be dedicated to Council.
- Stage 7 – Creation of six (6) super lots and construction of road and civil works.

The SSDA was lodged with DPHI and publicly exhibited for 49 days between 11 December 2025 and 29 January 2026. During this time, alongside DPHI’s own Request for Submissions Letter, 13 submissions were received from relevant government agencies and organisations, and one (1) submission was received from a member of the public in support of the proposed development. This Submissions Report provides an analysis of submissions, actions taken since public exhibition, the Applicant’s response to submissions, and provides an updated justification of the proposed development.

This Submissions Report, as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), has been prepared in accordance with DPHI’s State Significant Development Guidelines, including Appendix C – Preparing a Submissions Report.

2.0 Analysis of Submissions

Alongside DPHI's letter requesting additional information, a total of 14 submissions were received in response to the public exhibition of the SSDA. As shown in **Table 1**, 12 submissions were from State and government agencies, and one (1) submission was received from Canterbury Bankstown Council. Two (2) submissions were received from the public, of which one (1) was made intending to be made against a different development, and one (1) was made in support of the proposed development.

Table 1 Submissions Breakdown

Stakeholder Group	Submission Name	Submission Type	Total
Agencies	DPHI	Comment	12
	Heritage NSW	Comment	
	Transport for NSW (TfNSW)	Comment	
	State Emergency Service (SES)	Comment	
	Rural Fire Service (RFS)	Comment	
	Jemena	Comment	
	Conservation Programs, Heritage, Regulation (CPHR)	Comment	
	Sydney Water	Comment	
	Crown Lands	Comment	
	Ausgrid	Comment	
	Bankstown Airport	Comment	
	Civil Aviation Safety Authority	Comment	
Council	Canterbury Bankstown Council	Comment	1
Public	Daniel Mendes	Support	1
Total Submissions			14

2.1 Summary of Submissions

To frame the response to submissions provided in **Section 4**, a summary of the issues raised in the submissions received is provided in **Table 2**.

Table 2 Summary of Submissions

Category	Stakeholder	Issue Raised
Procedural Matters	Bankstown Airport	Post-consent Approvals Any approval of the SSDA should specify that crane activities for the site must be assessed separately.
	Canterbury Bankstown Council	Consistency and Validity of Documentation - Vegetation removal should be consistently represented in the BDAR, Contamination Report and Bushfire Report. - An updated site survey is required.
Economic, Environmental and Social Impacts	Canterbury Bankstown Council, CPHR	Cumberland Plain Woodland (CPW) and other Biodiversity - All C2 zoned land must be retained protected and managed under a VMP. - The C2 zoning cannot be used as justification for avoidance of impacts. - CPW should be retained across the entire site. - Vegetation is proposed for removal outside of the site which can be avoided. - The BDAR does not demonstrate that the mitigation hierarchy has been applied. - Impacts to the C2 zoned land are not permissible and should be removed. - No genuine attempt to retain CPW within the subdivision has been made. Greater attempts can be made to retain more vegetation. - The provenance of plant species and canopy cover as a percentage of site area have not been articulated in the Landscape Plan.

Category	Stakeholder	Issue Raised
		- The VMP must address all CPW, not just the C2 zoned land. - The VMP does not mention the Hollow Offset Replacement Strategy and Nestbox Management Plan. - The VMP does not meet the requirements of the Canterbury Bankstown DCP 2023. - The Landscape Plan does not reflect the connected canopy.
	CPHR, SES	Flooding - The proposed street network is shown to be subject to flooding which contradicts the emergency response proposed. - An updated FIRA should be prepared to be consistent with the relevant NSW State Guidelines. - Flood studies are outdated. - Consultation with CPHR should be carried out to understand the most appropriate modelling approach. - The proposed shelter-in-place emergency response plans is not supported.
	Canterbury Bankstown Council	Bushfire Protection A positive covenant must be created for the perpetual management of any asset protection zones.
	Canterbury Bankstown Council, Jemena	Urban Design / Architecture - The proponent should include some commercial and retail options in the proposal. - The proposal includes two public parks which lack connection to the eastern boundary and neighbouring school. - There should be a greater setback of the residential superlot from the M5 Motorway in the southeast corner. - Stages 1 and 2 buildings excessively rely on repetitive patterns for materiality, architectural elements and roof forms. - Housing diversity is limited to 3- and 4-bedroom dwellings. - Proposed floor to floor heights are not adequate. - The front yard pedestrian pathway configurations are inadequate. - Jemena's assets are located in the vicinity of the site and should be taken note of.
	Canterbury Bankstown Council, Crown Lands, Jemena	Assets - The material of the road is not supported. - No DRAINS or MUSIC Model was provided. - The detailed design of the stormwater system shall incorporate all of Council's Pre-DA comments. - Further detail on the size and nature of the basins is required. - Flood modelling is not adequate and requires further assessment. - Water should be connected to public parks. - Pedestrian crossing provisions outside of the site are inadequate. - Amendments to existing road infrastructure on Horsely Road are required to facilitate the proposed arrangement. - Ashford Avenue and Bullecourt Avenue will require transfer to the local road authority.
	Canterbury Bankstown Council	Acoustic The Acoustic Report needs to be updated to reflect the applicable requirements.
	Heritage NSW	Heritage - Additional archaeological assessment may be required to determine the potential for Aboriginal heritage at the southern end of the site. - The Aboriginal Due Diligence Assessment should be made an addendum to the ACHAR and provided to the Registered Aboriginal Parties (RAPs) for review and comment.

3.0 Actions Taken Since Exhibition

3.1 Additional Consultation

3.1.1 DPHI Site Visit

On Tuesday 3 March 2026, DPHI undertook their site visit in carrying out the assessment. Mirvac representatives were in attendance for this site visit as the site is not publicly accessible and is currently undergoing remedial work. During the site visit the following details were able to be clarified by the Applicant:

- A plant nursery is currently located on site which contains previously propagated seedlings from trees on site. Importantly, this nursery will allow for upwards of 80% of street trees to be derived from propagated seeds. Mirvac were able to speak to tree replacement ratios, and the species of trees propagated for future use, being predominantly Cumberland Plain Woodland (CPW).
- The existing Horsely Road intersection was identified, clarifying the existing alignment of the entrance/egress roadway and providing a high-level explanation of the ecological benefits of the proposal versus one in accordance with the DCP. Explanation of the rationale further clarified that Council and Mount Saint Joseph's School (MSJ) had a preference to retain the Horsley Road roundabout as noted in **Section 4.3.2**.
- General mitigation measures implemented into the proposed design to promote / retain a high amenity for future residents and the neighbouring MSJ school, including but not limited to the strategic orientation of services infrastructure.

3.1.2 Meeting with SES and CPHR

On Thursday 5 March 2026, the Applicant met with DPHI, the SES and the CPHR Group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). The purpose of this meeting was:

- to provide additional context and clarification to SES and CPHR regarding items raised in their submissions on SSD-97092958, issued on 28 January and 3 February 2026 respectively; and
- to gain in-principal support from DPHI and the relevant agencies on the subsequent actions required to respond to these items with the consideration of the additional context.

The clarifications provided by the Applicant allowed the SES and CPHR to provide clear directions for what is needed to be amended in the proposal, and what further information is required for these agencies to carry out their assessment following the lodgement of the Submissions Report. CPHR and the SES requested the following updated documentation:

- Use clearer language around the emergency response in the event of a flood.
- Address both the Local Kelso Swamp and Regional Georges River Flood Studies.
- Include the FIRA from the Planning Proposal (hereon referred to as the JWP report) within the SSDA and ensure the methodology behind the flood modelling is robust.
- Discuss road inundation, including consideration of the flow in roads, flood depth and hazard categories for vehicles and pedestrians.
- Calculate the number of dwellings affected by each relevant flood event.
- For dwellings located in the H5 Hazard category, discuss the depth and velocity of a flood event.

These findings have been integrated into the updated FIRA at **Appendix F** and are discussed in **Section 4.2**.

3.1.3 Meeting with DPHI

The Applicant also met with DPHI on Friday 6 March 2026, with the purpose being to:

- provide further context regarding items raised in their Request for a Response to Submissions Letters for SSD-97092958, issued on 2 and 6 February 2026; and
- gain in-principal support from DPHI on the subsequent actions required to respond to these items with the consideration of the additional context.

DPHI provided direction on what further information should accompany the Response to Submissions, including the information required to understand the history of biodiversity on the site, the rationale behind the design of the Horsley Road intersection, and an overview of how Council comments have been addressed.

3.2 Project Refinements and Amendments

Minor amendments have been made to the proposed design in response to the submissions received within the exhibition period. Importantly, no changes were required to the number of dwellings, road network layout, subdivision layout, or location of the public parks. The amendments made are as follows:

- Deletion of the footpath in the C2 Environmental Conservation zone and rearrangement of pedestrian infrastructure at the Horsley Road intersection.
- Additional and amended pedestrian signage to accompany the updated pedestrian infrastructure.
- Reconfiguration of the proposed carpark within the E1 Local Centre zone including the removal of low retention value vegetation.
- Modification of the existing roundabout splitters on Horsley Road.
- Inclusion of additional pram ramps on footpaths fronting the existing childcare centre.
- Amendment to the colour palette of houses fronting Ashford Avenue.
- Introduction of an additional window on houses with a boundary to a laneway or public space.
- Removal of raised pedestrian thresholds. Replaced with proposed speed humps and pram ramp kerb blisters on Ashford and Road 2A.
- Updated stormwater layouts in response to Council's submission, including but not limited to updated stormwater road crossings, illustrating stormwater pit labels, and providing long section diagrams for all stormwater works proposed.
- Additional signage for the proposed stormwater basins and park areas.
- Addition of water connection points for parks.
- The inclusion of a water fountain in the southern park.
- Fence details on the perimeter of the C2 Environmental Conservation zone in accordance with the requirements of the VMP.
- Minor change to the proposed planting schedule.

3.3 Additional Assessment

No additional assessment reports were required to be prepared as a result of the submissions received during the exhibition period, however the following technical reports have been updated to provide further clarification of the proposed development and to be made consistent with the updated design:

- Civil Plans
- Arboricultural Impact Assessment
- Biodiversity Development Assessment Report
- Vegetation Management Plan
- Flood Impact Risk Assessment
- Civil Engineering Report
- Traffic Impact Assessment
- Aboriginal Cultural Heritage Assessment Report
- Architectural Plans
- Acoustic Report
- Waste Management Plan
- DRAINS Model
- MUSIC Model

4.0 Response to Submissions

This section summarises the key issues raised in the submissions and outlines how they have been addressed in the updated project documentation. A full response to each matter raised in the submissions are addressed in **Appendix A**.

4.1 Biodiversity

Council, CPHR and DPHI all raised concerns regarding the biodiversity impacts of the proposed development. The various biodiversity related concerns are addressed in the following sections.

4.1.1 C2 Environmental Conservation zoned land

Avoidance Calculation

Council noted that the C2 Environmental Conservation zoned land cannot be utilised as justification for avoidance of impacts in accordance with the *State Environmental Planning Policy (Biodiversity and Conservation) 2021* and *Environmental Protection and Biodiversity Conservation Act 1999*. Council have therefore requested that avoidance be demonstrated elsewhere on the site.

Chapter 7 of the updated BDAR (refer **Appendix D**) provides a discussion of the avoidance of impacts for the project, including the retention of 22 CPW trees within the E1 Local Centre zoned land, CPW along the western boundary of Milperra Reserve, and retention of planted native and exotic trees within the proposed parklands, which offer connected canopy and pre-existing hollows, as shown in the below **Figure 1 and 2**.

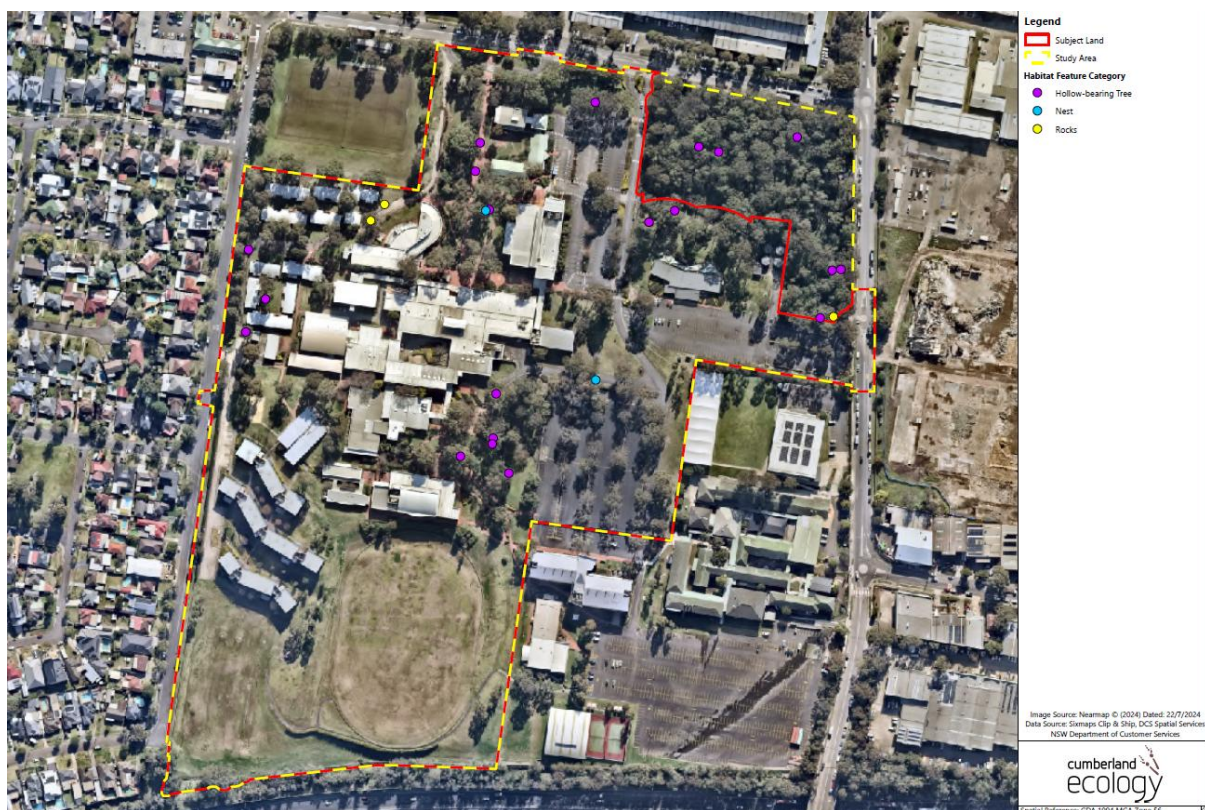


Figure 1 Habitat features within the site

Source SLR Consulting



Figure 2 Tree canopy coverage plan

Source: Urbis

The C2 zoning is referenced within the BDAR as it speaks to the history of the project, as preservation of biodiversity has been a key aspect of this project since the overarching project began at the Planning Proposal stage, where the C2 Environmental Conservation zoned land was zoned SP2 Infrastructure. However, it should be noted that the C2 Environmental Conservation zoned land has not been relied on for demonstration of 'avoidance' of biodiversity impacts within this SSDA.

Impacts to the C2 Zoned Land and the Horsley Road Intersection

Council noted that the proposed development incurs impacts to the C2 Environmental Conservation zoned land as a result of the Horsley Road intersection design. It is important to note that the C2 Environmental Conservation zoning was applied by the DPHI during the former Planning Proposal via a desktop study, and did not take into account the on-ground conditions. Section 8.6 of the updated BDAR discusses the impacts to this land.

Within the study area specified in the BDAR, the C2 Environmental Conservation zoned land contains a pre-existing road at the curved Horsely Road intersection. Under the Biodiversity Assessment Method (BAM), vegetation mapping uses tree canopy when applying the mapping to figures, and so updated mapping has

been provided in the BDAR to indicate more accurately the extent of vegetation removal (as shown in **Figure 3**).

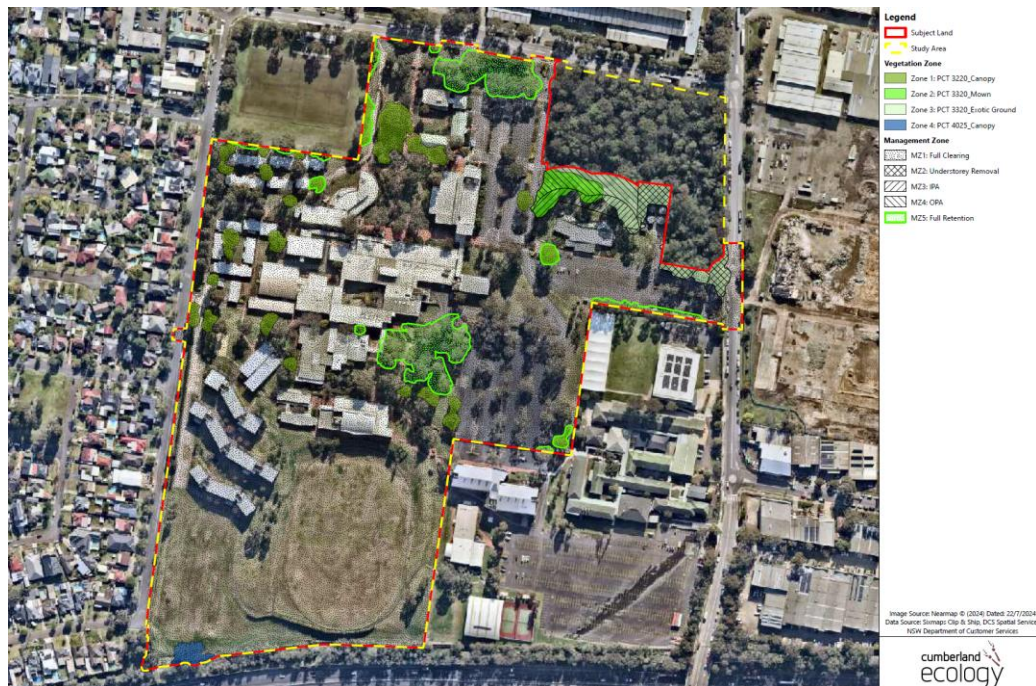


Figure 3 Vegetation removal and retention proposed

Source: SLR

This calculation methodology means that the impact area has been overestimated for the 'understorey removal' management zone (refer Figure 13 of the BDAR). The impacts are therefore presented in a more conservative light where canopy coverage is oftentimes interpreted as being overtop of equally important understorey plantings. As this management zone largely consists of the tree canopy over the existing road, this is not the case in this context of this project. Figure 4 of the BDAR has been updated to represent this more clearly.

In accordance with the BAM, the Applicant is not proposing to reduce the credit liability as a result of the above, but feel it is important to include to explain that the impact to the C2 Environmental Conservation zoning is minimal.

4.1.2 Retention of CPW and Vegetation in General

Council also noted that CPW should be retained across the entire subdivision. Additionally, Council further stated that "no genuine attempt has been made to retain vegetation within the proposed subdivision".

As outlined in Section 7.2.2 and Figure 13 of the BDAR (refer **Appendix D**), CPW has been retained throughout the study area, particularly within the E1 Local Centre zoned land, along the western boundary of the Milperra Reserve, and now within areas in the R1 General Residential zone.

Chapter 7 of the updated BDAR discusses the avoidance of impacts in depth, and Section 7.2.3.1 of the BDAR explains how the Applicant and their ecologist conducted monthly workshops over a period of six months with the engineering team to review the civil plan and project layout in order to retain as much native vegetation as possible within the subject land. A number of case studies were discussed in detail, with the objective of retaining additional vegetation, however in a workshop with Council (dated 18 June 2025), Council were not supportive of any of the proposed case studies.

Notwithstanding, since the issue of the RFI, further opportunities have been found to retain additional CPW across the residential zoned land within the site. An amended design has been prepared which identifies the retention of Trees 56, 217, 400, 401, 403 and 408 (refer to civil plans at **Appendix B**). This has been achieved by implementing a kerb blister on Road 2B and amalgamating lots under the future SSDA 2, resulting in a reduction of 3 future residential lots.

The trees proposed to be retained in the amended design are located outside of areas requiring remediation and are capable of being accommodated via changes to the proposed bulk earthworks. Importantly, as shown in the Arboricultural Impact Summary at **Appendix W**, the trees proposed to be retained are of the highest Arboricultural value, which were all assessed as having a long useful life expectancy and high retention value.

Although vegetation within the RE1 Public Recreation zoned land does not conform to CPW, effort has also been made to retain as many trees as possible within these areas. The northern and central park areas contain a high density of planted native trees, which have a connected canopy and so is of higher biodiversity value than the scattered trees throughout the site. Additionally, both of these areas contain multiple hollow-bearing trees (refer Figure 14 of the BDAR at **Appendix D**), which are an extremely important resource for threatened fauna.

The current design has been based off the structure plan under the DCP which was established under the Planning Proposal, which took into account the future vegetation removal required to deliver the overarching project. In carrying out the detailed design, several areas of vegetation were able to be retained within the SSDA as a result of more bespoke approach to engineering matters such as road and stormwater drainage design, resulting in the retention of more vegetation than anticipated by the Planning Proposal (refer **Figure 4**). As shown in this figure, a total 1,322 trees are to be delivered or retained across the site, increasing tree canopy coverage from 16.4% of the site area to 34%. As outlined in the updated BDAR, the vegetation removal proposed is necessary for the delivery of the proposed development, as envisioned by the site-specific DCP.



Figure 4 Tree replacement strategy

Source: Urbis

Council noted that vegetation located outside of the site to the south is proposed to be removed and this vegetation removal should be avoided. As shown in Section 8.42 and Figures 13, 20 and 21 of the BDAR, the trees along the southern boundary are comprised of a small patch of Riverflat Eucalypt Forest (PCT 4025) and planted native vegetation (*Casuarina glauca*). This strip of vegetation has been included in all the figures of the updated BDAR and in the offsetting calculations for the project. Due to the requirement for a retaining wall alongside the boundary of the site with the M5 Motorway, these impacts are unavoidable. The removal of this vegetation will not break or fragment the vegetation connectivity along the M5, as there are additional trees to be retained within the verge.

4.2 Flooding

As shown in the updated FIRA at **Appendix F**, additional flood investigations were carried out in response to the CPHR, SES and Council comments, and as a result of the meeting held with CPHR, the SES and DPHI as described in **Section 3.1.2**. For clarity, no amendments to the design of the proposed development are required as a result of this additional modelling as the information presented does not warrant any design amendments.

4.2.1 Emergency Response

Clarification regarding the emergency response was required. The updated FIRA clarifies that shelter-in-place is not proposed for any dwelling proposed under this SSDA or SSDA 2 (SSD-109921491), as the proposed development allows for the safe evacuation of residents via the proposed road network. This evacuation route is detailed in Section 8 of the updated FIRA which also demonstrates that the site allows for a viable connection into the SES Evacuation Route to move further north away from flood prone land.

4.2.2 Kelso Swamp and Regional Georges River Flood Studies

The updated FIRA addresses both the Kelso Swamp and the Georges River to ensure the proposed development appropriately addresses all flood constraints which have the potential to impact the site. The proposed development has generally no impact on the Kelso Park/Swamp with flood level increases of less than 10mm in 1% AEP event and PMF event. For clarity, the modelling previously undertaken was based on the JWP Report prepared for the Planning Proposal. As requested, this report has been appended to the updated FIRA as a demonstration that both flood events have been considered in the assessment of flood impacts.

4.2.3 Road Inundation

Flood model results have been assessed with consideration for vehicle evacuation; all internal roads are demonstrated to be hydraulically safe for vehicles up to the PMF for local storms. As requested by the SES in the meeting held 5 March 2026, an additional assessment of overland flow within the road carriageways was carried out for critical locations which confirmed conditions to be hydraulically safe for vehicles (refer Section 5 of the updated FIRA). In the regional storm event, the lower roads are inundated as a result of the backwater effects from the Georges River, however evacuation will occur prior to these becoming inundated. It was concluded that the overland flow for evacuation routes will be no different than in the local PMF storm.

4.2.4 Dwellings Impacted by Flooding

As shown in Section 8 of the updated FIRA, in line with the recommendations of the SES derived from the meeting held with them, the number of dwellings impacted per flood event has been undertaken (refer **Figure 5**).

Table 5: Regional Flood Dwellings Inundated/Cut-Off

EVENT	REGIONAL FLOOD LEVEL	DWELLINGS INUNDATED	DWELLING DRIVEWAYS CUT OFF FROM EVACUATION
1% AEP	5.55 m AHD	0	7
0.5% AEP	5.68 m AHD	0	8
0.2% AEP	5.85 m AHD	0	8
PMF level	11.8 m AHD	136	147

Figure 5 Dwellings affected by Flood events

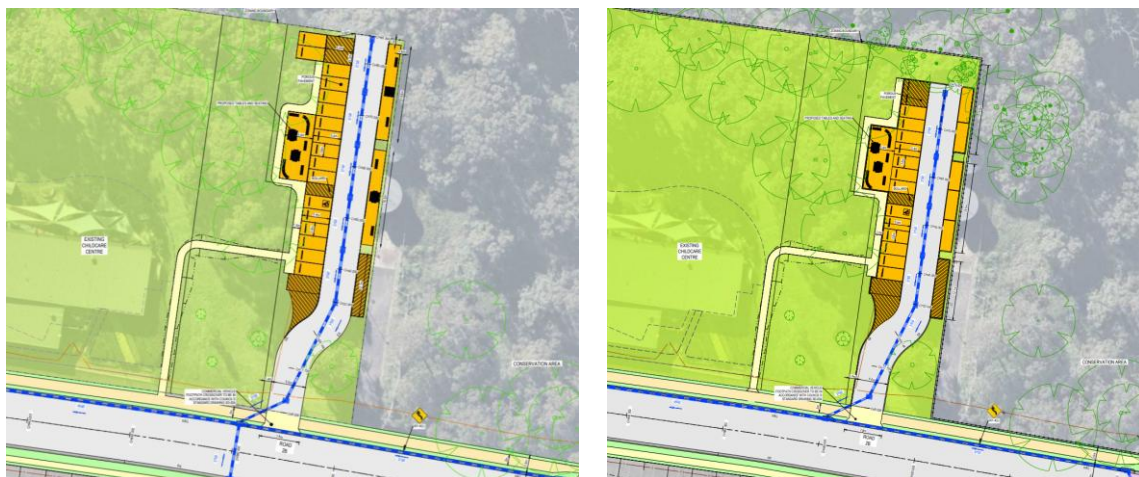
Source: Beveridge Williams

Additionally, Beveridge Williams have updated the Hazard mapping and have discussed the velocity of the flood event with respect to the pre- and post-development scenario. This additional assessment has determined that flood velocities in the existing 1% AEP event exceed 1m/s on Ashford and Flanders Avenues and locally in the south-western corner. The proposed scenario reduces velocities generally to under 1m/s along Ashford and Flanders Avenues. For the PMF, existing velocities exceed 1.5m/s on roadways and reach 2m/s in the south-western corner, while the proposed scenario sees velocities reduced to under 1.5m/s for most of along Ashford and Flanders Avenues.

4.3 Civil Design Amendments

4.3.1 E1 Zoned Land Car Park Design

The SSDA proposed the construction of a carpark to serve the existing childcare centre and permanent sales office proposed under SSDA 2. Importantly, the existing childcare centre is proposed under SSDA 2 to be modified to provide for a larger student capacity. As this additional capacity is not proposed within this subject SSDA, Council has raised that no more than the required car parking space should be provided in accordance with the active consent, which requires 17 car parking spaces be provided. Additionally, DPHI raised that further investigations into the carpark's impact on the C2 zoned land should be carried out. For both of these reasons, the previous design compared to the amended design is shown at **Figure 6**.

**Figure 6** Previously Proposed Design versus Amended Design of the car park

Source: Beveridge Williams

In response to queries raised by DPHI regarding the boundary condition between the proposed car park and the C2 Environmental Conservation zoned land, additional survey information was received. This further investigation confirmed that by revising the northern most extent of the car park design, no CPW trees or any trees within the C2 Environmental Conservation zoned land would be impacted. As such, this

Submissions Report is accompanied with revised Civil and Landscape Plans (refer **Appendix B** and **M**) that propose minor revisions to the car park design to ensure no impacts are caused to existing vegetation on the adjoining C2 zoned land. This further investigation confirmed that the carpark design does not incur the removal of any CPW trees or any trees within the C2 zone, however the investigation did reveal that some low retention value vegetation is required to be removed to accommodate the amended design. This vegetation removal has been detailed in the BDAR and Arboricultural Impact Assessment at **Appendix D** and **C** respectively, both of which documents support its removal.

Importantly, as the proposed alterations and additions to the childcare centre and the permanent sales office are not proposed in this SSDA, and therefore any additional car parking required for these components will be provided under the future SSDA 2.

4.3.2 Horsley Road Intersection

DPHI and Council raised concerns that the design of the Horsley Road intersection was not supported due to, in part, its location partially within the C2 Environmental Conservation zoned land. It is important to note that the proposed intersection utilises an existing road arrangement which feeds into the existing roundabout from the existing carpark as shown in **Figure 7**.



Figure 7 Aerial image of the existing Horsley Road Intersection

Source: Google Imagery 2026

The intersection design has been slightly amended to replace the footpath within the C2 Environmental Conservation zone with a raised boardwalk following an investigation into how further biodiversity impacts can be minimised (refer **Figure 8**).



Figure 8 Previously Proposed Design versus Amended Design of the Horsley Road Intersection

Source: Beveridge Williams

Importantly, the overall design of the proposed intersection is entirely permissible in the C2 zone. As the design utilises an existing arrangement, no trees within the C2 zone are required to be removed, and in retaining the existing arrangement as opposed to developing it in accordance with the DCP, a high retention value tree within the conservation zone is able to be retained. The replacement of the footpath with a boardwalk raises the structure above the existing ground level, impeding less upon the significant ground covers in the CPW community within the C2 zone.

Due to the apparent benefits of maintaining the existing arrangement, the Applicant has elected to maintain the original design, with only minor amendments to pedestrian infrastructure proposed.

5.0 Updated Project Justification

5.1 Additional Impacts Considered

The amended proposal incorporates refinements in response to feedback provided during public exhibition. The anticipated impacts of the proposed development, as amended, are generally consistent with those proposed under the original application. Where requested additional assessment has been provided as part of the response to submissions and detailed in **Section 4**. The additional assessment confirms that the proposed development will not have any adverse environmental impacts.

5.2 Site Suitability

The site is suitable for the proposed development for the following reasons:

- The proposed uses align with the land use zones approved for the site under Planning Proposal PP-2021-5837, including those located within the C2 Environmental Conservation zone.
- The site is capable of being remediated to suitable standards for the proposed uses.
- Tree removal has been avoided, mitigated or managed through the detailed design of the subdivision, as further demonstrated in updated documentation.
- The subdivision and creation of a community title will enable the ongoing management of the C2 Environmental Conservation zoned land.
- The site has an appropriate interface with surrounding land uses that will ensure both future and existing residents in the site's vicinity do not experience any long term amenity issues.
- Further investigations have been undertaken as part of the Response to Submissions process and minor amendments have been incorporated to ensure the project achieves the best environmental, social and economic outcome.

5.3 Public Interest

The proposed development is considered to remain within the public interest as it will unlock previously underutilised land for residential use, significantly boosting housing supply across the Canterbury Bankstown LGA. With the potential to deliver approximately 385 additional low-density dwellings, the development presents a rare opportunity to enhance housing diversity at scale, while making a meaningful contribution toward meeting the Housing Accord target of 14,500 new homes for the Canterbury Bankstown LGA.

6.0 Conclusion

This Submissions Report has considered all submissions received during and following the exhibition of the proposed SSDA for a new residential community located at 2 and 2A Bullecourt Avenue, Milperra. Various minor changes to the development are proposed by the Applicant in response to the submissions received during the public exhibition of the SSDA.

The proposed development directly aligns with the strategic vision and objectives of several Local and State Government initiatives to increase housing supply and will specifically contribute towards the National Housing Accord 2022.

The proposed changes to the exhibited design enhance the overarching project and minimising environmental impacts by improving the contextual response of the proposal with its surrounding environment.

As outlined in this Submissions Report and the submitted EIS, the proposed development will not result in any unreasonable adverse environmental impacts that cannot be appropriately managed through mitigation measures. The updated project justification considers the amendments made to the proposed development in response to submissions and demonstrates that the impacts are acceptable.

If any information beyond the contents of this letter is required, please do not hesitate to contact me at my below details.

Kind regards,



Lexie Drury

Planner

0425 303 628

ldrury@beamplanning.com.au

