Submissions Report

Mixed-Use Development with In-Fill Affordable Housing

2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield

Submitted to the Department of Planning, Housing and Infrastructure on behalf of Convertia Pty Ltd

SSD-80432461

Prepared by Colliers Urban Planning

13 November 2025 | 2240053

'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.

'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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Executive Summary

This Submissions Report has been prepared on behalf of Convertia Pty Ltd ('Convertia' or 'the Applicant') to address the matters raised in during the Public Exhibition of the mixed-use in-fill affordable housing development (the Proposal) located at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield (the Site).

The State Significant Development Application (SSDA) (SSD-80432461) was lodged with the Department of Planning, Housing and Infrastructure (DPHI) and publicly exhibited for 28 days from 12 August 2025 until 8 September 2025. A subsequent request for response to submissions was issued on 15 September 2025. A total of sixteen (16) submissions and government agency advice was received from relevant government agencies and organisations, including five (5) submissions from members of the public.

Overview of Submissions

During public exhibition, government agency advice and submissions were received from a total of sixteen (16) people/groups. Specifically, submissions were received from Stratfield Council and five (5) members of the Public, with advice from the following government agencies:

- NSW DCCEEW – Conservation Programs, Heritage & Regulation Division (CPHR);
- NSW DCCEEW – Water Group
- NSW DCCEEW – Heritage NSW (Aboriginal Cultural Heritage)
- NSW DCCEEW – Heritage NSW (Environmental Heritage
- NSW State Emergency Service (SES)
- Transport for NSW (Sydney Trains);
- Transport for NSW (TfNSW);
- Sydney Water;
- Ausgrid; and
- NSW Environmental Protection Authority (EPA).

In addition, DPHI issued a key issues letter on 21 October 2025, requesting key and additional matters that the Applicant should address in the Submissions Report.

The submissions related to a range of issues that included:

- Boundary conditions;
- Residential amenity;
- Built form and overshadowing;
- Landscaping and tree removal;
- Flooding;
- Groundwater
- Contamination;
- Waste management;
- Engagement with Registered Aboriginal Parties; and
- Environmental heritage.

Actions taken since Exhibition & Response to Submissions

Following the Public Exhibition of the Proposal, some design refinements have been made in response to the advice and submissions received. Importantly, any refinements made remain consistent with the project description within the exhibited EIS and do not raise any additional environmental impacts. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposed development is not required.

In response to the advice and submissions received, a series of formal responses have been provided by consultants to address matters raised. In addition, an updated Waste Management Plan has been prepared to address the issues raised by Council and a Heritage Impact Statement has been prepared to address environmental heritage issues raised by Heritage NSW.

A detailed response to each matter raised is provided at **Section 4.0** of this report.

Updated Project Justification

Having regard to environmental, economic and social considerations, the carrying out of the Proposal remains justified for the following reasons:

- It is permissible with consent and is consistent with the objectives of the MU1 Mixed Use zone under the Strathfield LEP 2012;
- It meets the relevant statutory requirements of the relevant Environmental Planning Instruments including the Strathfield LEP 2012, with exception of the proposed exceedance to the FSR development standard, which is due to the need to provide wintergardens to a number of apartments, which is justified and supported by a Clause 4.6 Variation;
- It will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- It is a direct response to the NSW Government's affordable housing policy and need for more dwellings that are well located, delivering 35 affordable units and 193 market units, which will contribute to local, State and national housing targets;
- It will provide a diverse supply of dwellings, ranging from one (1) bedroom to three (3) bedroom apartments to meet the housing and social needs of future residents;
- It provides a high-quality architectural and landscape design that offers a range of housing types, communal facilities, and gathering spaces that will contribute to a safe, secure and active environment;
- It provides a high standard of residential amenity for all residents within the Site that is consistent with the objectives of the Apartment Design Guide (ADG), as well as protecting the visual privacy, overshadowing, and solar amenity of surrounding residential properties; and
- It is suitable for the Site and in the public interest.

Given the merits described above, significant benefits associated with the Proposal and the refinements made in response to submissions received, it is requested that the SSDA be approved in an orderly manner.

1.0 Introduction

This Submissions Report has been prepared on behalf of Convertia Pty Ltd ('Convertia' or 'the Applicant') to address the matters raised in during the Public Exhibition of the mixed-use in-fill affordable housing development (the Proposal) located at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield (the Site).

The State Significant Development Application (SSDA) (SSD-80432461) was lodged with the Department of Planning, Housing and Infrastructure (DPHI) and publicly exhibited for 28 days from 12 August 2025 until 8 September 2025. A subsequent request for response to submissions was issued on 15 September 2025. A total of sixteen (16) submissions and government agency advice was received from relevant government agencies and organisations, including five (5) submissions from members of the public.

This Submissions Report provides an analysis of submissions and government agency advice, actions taken since Public Exhibition, the Applicant's response to matters raised, and provides updated justification for the Proposal. It is accompanied by supporting information and technical reports (refer to the **Appendices**).

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 the DPHI's *State Significant Development Guidelines,* including *Appendix C – Preparing a Submissions Report*.

1.1 Exhibited Development

The SSDA, as exhibited, sought approval for the construction of a mixed-use in-fill affordable housing development on the Site. Specifically, the exhibited development sought consent for the following:

- Site preparation works, including demolition of existing structures, removal of twenty-six (26) trees, and bulk excavation.
- Construction and operation of a 20-storey (plus roof plant) mixed-use development comprising shop top housing with ground level commercial uses, including:
  - Two (2) commercial tenancies and residential lobbies at Ground Level;
  - A 4-storey podium, including 1,600m² of communal open space including two community rooms;
  - Two (2) 20-storey residential towers; and
  - 228 residential apartments, including 35 infill affordable apartments, throughout the podium and towers.
- Provision of four (4) levels of basement parking with a total of 237 car parking spaces comprising:
  - 195 residential car parking spaces (including 35 accessible spaces);
  - 17 commercial car parking spaces (including 2 accessible spaces); and
  - 25 visitor car parking spaces (including 3 accessible spaces).
- Street tree planting and landscaping, extension and augmentation of services and infrastructure as required.

The Proposal, as exhibited, is illustrated on the visualisation provided in **Figure 1** and **Figure 2** on the following page.

Figure 1 Perspective Visualisation of the Proposal from Albert Road to the South-West

Source: Kennedy Associates Architects

Figure 2 Perspective Visualisation of the Proposal from the Rail Corridor to the North-East

Source: Kennedy Associates Architects

2.0 Analysis of Submissions

2.1 Overview

During public exhibition, government agency advice and submission were received from a total of sixteen (16) people/groups. A summary of the advice and submissions received is provided in **Table 1** below.

Table 1 Summary of Advice and Submissions Received

Group	Position
Council	
Strathfield Council	Comments for consideration
Government Agencies	
NSW DCCEEW – Conservation Programs, Heritage & Regulation Division (CPHR)	Comments for consideration
NSW DCCEEW – Water Group	Comments for consideration
NSW DCCEEW – Heritage NSW (Aboriginal Cultural Heritage)	Comments for consideration
NSW DCCEEW – Heritage NSW (Environmental Heritage	Comments for consideration
NSW State Emergency Service (SES)	Comments for consideration
Transport for NSW (Sydney Trains)	Recommended conditions of consent
Transport for NSW (TfNSW)	Comments for consideration
Sydney Water	Post-approval requirements
Ausgrid	Post-approval requirements
NSW Environmental Protection Authority (EPA)	No comments
Member of the Public	
Benjamin Cullen	Support
Daniel Mendes	Support
Name Withheld (1)	Object
Name Withheld (2)	Object
Name Withheld (3)	Object

In addition, DPHI issued a key issues letter on 21 October 2025, requesting key and additional matters that the Applicant should address in the Submissions Report. The key issues related to boundary conditions, amenity, landscaping, compliance with development standards and other relevant issues raised by government agencies.

A detailed response to each matter raised is provided at **Section 4.0** of this report.

2.2 Summary of Matters Raised

A summary of the matters raised in the advice and submissions received is provided in **Table 2** below.

Table 2 Summary of Matters Raised

Category	Issues	Stakeholder
The Project	• DPHI raised issues about the proposed setbacks and boundary conditions to 9 Albert Avenue (existing Shell Service Station); and	

Category	Issues	Stakeholder
	• DPHI requested that the Applicant confirm proposed Gross Floor Area (GFA) and Height of Building on Architectural Drawings.	
Procedural Matters	• Council identified a series of issues in relation to waste management, including lack of FOGO management, collection frequencies and waste-chute management. • Council requested the Applicant confirm and define all proposed land uses, prepare a Plan of Management and Travel Plan; and • TfNSW requested that the Applicant consult further with TfNSW regarding Strategic Cycleway Corridors Program.	
Economic, Environmental and Social Impacts	• DPHI and Council requested clarification on potential residential amenity effects pertaining to noise intrusion from the rail line, mechanical plants, ventilation systems and construction; • DPHI, Council and a member of the public raised concerns around the proposed tree removal, in-particular Tree 2 along Pilgrim Avenue; • A member of the public raised concerns about the overshadowing associated with the Proposal and the change in density to the immediate surrounding area; • DPHI, Council, CHPR and the NSW SES identified the previous flood assessment did not adequately addressed the impacts of flooding, especially during the Probable Maximum Flood (PMF) event and no consideration for climate change; • DPHI, CPHR and the NSW SES also raised concerns to the proposed Flood Emergency Response Plan (FERP); • Heritage NSW requested that additional evidence is provided to confirm engagement associated with Aboriginal cultural heritage has been undertaken in accordance with the relevant guideline; • Heritage NSW outlined that a Heritage Impact Statement is required to appropriately consider the impacts of the Proposal to surrounding environmental heritage; • DPHI and Council requested confirmation that the contamination assessments undertaken appropriate comply with the relevant legislation and guidelines; • Council raised concerns about potential contamination impacts from the adjoining Service Station at 9 Albert Avenue; and • Council and Water Group requested clarification on the maximum volume of water take to aquifer interference activities.	
Justification and Evaluation of Project as a Whole	Not applicable.	
Issues Outside Project Scope	Not applicable.	

3.0 Actions taken since Exhibition

This section summarises the further engagement undertaken by the Applicant, describes any refinements or amendments to the Proposal and further impact assessment undertaken.

3.1 Refinements to the Proposal

Following the Public Exhibition of the Proposal, some design refinements have been made in response to the advice and submissions received. Importantly, any refinements made remain consistent with the project description within the exhibited EIS and do not raise any additional environmental impacts. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposed development is not required.

The extent of proposed design refinement is illustrated on the updated Architectural Drawings (**Appendix B**).

3.2 Further Assessment Undertaken

In response to the advice and submissions received, a series of formal responses have been provided by consultants to address matters raised. In addition, an updated Waste Management Plan (**Appendix I**) has been prepared to address the issues raised by Council and a Heritage Impact Statement (**Appendix J**) has been prepared to address environmental heritage issues raised by Heritage NSW.

For further discussion, refer to the Applicant's responses in **Section 4.0**, or supporting documentation (see **Appendices**).

4.0 Response to Submissions

This section provides a detailed summary of the Applicant's response to the matters raised in submissions received. The Applicant's responses are provided in the following sections and have been structured as follows:

- Department of Planning, Housing and Infrastructure (**Table 3**);
- Strathfield Council (**Table 4**);
- Government Agencies (**Table 5**);
- Members of the Public (**Table 6**).

4.1 Department of Planning, Housing and Infrastructure

The Applicant's response to the matters raised in DPHI's 'Request for Additional Information' dated 21 October 2025 are provided in **Table 3** below.

Table 3 Response to Department of Planning, Housing and Infrastructure Request for Additional Information

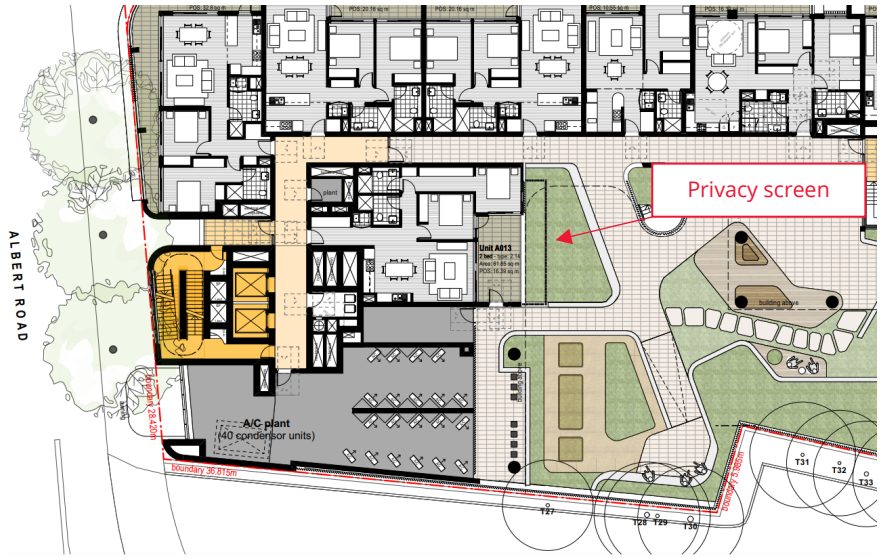
Matter Raised	Applicant Response
1. Boundary Conditions	
(a) Further consider the proposal's setbacks and with the adjoining petrol station at 9 Albert Road, including: *i. required buffers to vent point, tank filling connection points, pipes and underground fuel storage areas and consider the risk of vapor travelling and trapping in the underground car park.*	The Proposal includes a zero setback at Ground Level along the southern boundary with the adjoining property at 9 Albert Road (service station site). This is consistent with the previously approved Planning Proposal (PP-2020-178) and Site Specific DCP, resulting from that approval and subsequently approved Development Application for the site (DA2020/256). Both the Planning Proposal and the Site Specific DCP, anticipate the potential for a coordinated redevelopment across the two (2) sites bounded by Raw Square, Albert Road and Pilgrim Avenue (including 9 Albert Road). The Planning Proposal, which was supported by both the Regional Planning Panel and Strathfield Council specified that future redevelopment of both the subject site and 9 Albert Road should: • have a zero-lot boundary setback along their common boundary for the extent of the ground floor & podium level; and • provide a common vehicular access to both sites from the northern end of Pilgrim Avenue The proposed development is consistent with the above. Further, the proposed development: • provides for future vehicular access to 9 Albert Road via the proposed driveway off Pilgrim Avenue, which terminates at the boundary of the two (2) properties; and

Matter Raised	Applicant Response
	• addresses the short-term issues of a 'buffer' between itself and the service station site by providing a 5.5m high solid wall along its southern boundary up to and including podium level. This wall facilitates future development on 9 Albert Road and will become the below podium service zone of any future redevelopment on the service station site (see relevant section below for reference).  In the short term, the proposed wall isolates the proposed development from the service station site, eliminating the potential issues identified in point (i).
ii. maintenance access to the ground floor sewer service zone and pedestrian access door on boundary.	The proposed emergency access door for the sewer service chamber located on the boundary has been provided in accordance with consultant advice and Sydney Water requirements. It is only to be accessed by Sydney Water in an emergency, using a designated universal key for such chambers. Sydney Water has authority to enter a property (the service station) without owner's consent in such emergencies. A second access door for non-emergency maintenance is provided from within the ground level of the building.
iii. architectural treatment of the proposed southeastern elevation, including blank walls.	The architectural treatment of the southeastern elevation including 'blank' walls, has been carefully considered to ensure their integration in, and contribution to, the overall project composition and design. The walls, off form and precast concrete, are articulated with both vertical and horizontal recesses, glazing and louvres. They offset and balance the more highly articulated facades of the building. The lower levels will be integrated with new planting along the boundary and at podium level.

Matter Raised	Applicant Response
	It is noted that the design was reviewed by the SDRP who supported the approach. A perspective illustration is provided below for reference. 
iv. additional soft landscaping and tree protection zone along the common boundary.	An existing perimeter planting zone exists, via a raised planter bed, along the boundary of the two sites. This strip is currently partially planted with a number of Casuarina Equisetifolia, 'she-oak', a species noted for both their hardiness and ability to grow in constrained locations, as well as their scale and size. This planting will be augmented by further infill planting of the same species as part of the development.
v. consideration of the redevelopment potential of the adjoining site.	As noted above: • The Proposal is in accordance with the previously approved Planning Proposal (PP-2020-178), Site-Specific DCP and approved DA (DA 2020/256) for the Site; and • Both the Planning Proposal and Site-Specific DCP anticipate a coordinated redevelopment across the site bounded by Albert Road, Raw Square and Pilgrim Avenue (including 9 Albert Road). The Planning Proposal, which was supported by both the Regional Planning Panel and Strathfield Council, provided a concept design for future development on the adjoining site. The Proposal complies with and facilitates that concept, with the reference scheme present below (see p15 of the exhibited Design Report).

Matter Raised	Applicant Response
	
(b) If required, provide landowners' consent to the proposed tree removals and proposed access at 9 Albert Road.	As above, no access is proposed from 9 Albert Road with the proposed emergency access door for the sewer service chamber provided in accordance with consultant advice and Sydney Water requirements. It is only to be accessed by Sydney Water in an emergency, using a designated universal key for such chambers. Sydney Water has authority to enter a property (the service station) without owner's consent in such emergencies. The Applicant is seeking landowners' consent for tree removal on 9 Albert Avenue. However, it is requested that a suitable condition of consent is implemented, requiring proof of landowners' consent prior to the issue of Construction Certificate.

Matter Raised	Applicant Response
2. Amenity	
(a) Update the Acoustic Report with a minimum of five days noise testing and assess noise intrusion from the rail line, mechanical plants, ventilation systems and construction activities.	The Acoustic Report (Appendix Q of the EIS) adopted noise readings from the previously approved acoustic assessment associated with DA2020/256. To verify the results, Acoustic Solutions undertook a further four (4) days of noise monitoring. The Acoustic Response Letter (**Appendix F**) outlines the noise monitoring result carried out by Acoustic Solutions (November 2024) and Dural Group (November 2021). It confirms that the results have remained consistent with the outcomes of previous modelling and therefore reinforce the fact that the noise monitoring results accurately depict the existing noise environment. On this basis, additional noise monitoring is not considered warranted as it won't provide any further information that would change the outcome of the analysis.
(b) Provide further details to confirm that ventilation requirements would be met, noting the Acoustic Report states that all the windows and doors of all units in close proximity to Albert Rd (Level 1 to Level 5) are to be closed to achieve design sound levels.	There are nine (9) units fronting Albert Road on Levels 1-5. These units have been designed to achieve natural and cross ventilation whilst maintaining acoustic privacy. All nine (9) units, whilst capable of being naturally ventilated via operable windows, are fitted with a series of acoustically attenuated vertical plenums that augment natural ventilation at times when the doors and windows are closed. The plenums, the design of which has been developed by the project's wind consultants (Windtech) can be accommodated within an internal wall with an overall thickness of 270mm and will deliver the required airflow without impacting on acoustic performance. Refer to DA0471 to DA0474 of the updated Architectural Drawings (**Appendix B**) for details of the plenums and their locations. It is noted similar solutions using vertical plenums have been accepted by the NSW Land & Environment Court on other noise affected projects. A recent case where this approach was agreed to by the experts for both parties and the Court is L&E 2024/00363793 - Heathcote Tavern 2 Pty Ltd ats Sutherland Shire Council.
(c) Show on the Elevation and Section Plans, the recommended 1.8m gap-free sound barrier around the perimeter of the communal area as detailed in section 8.1.2 of the Acoustic Report.	The '1.8m gap free barrier' refers to a glazed screen to be included in the external perimeter of the Level 04 Communal Open Space to address possible noise impacts on neighbouring properties from the Communal Open Space. The updated Architectural Drawings (DA0205) (**Appendix B**) now clearly indicate the location of this screen (see extract below for reference).

Matter Raised	Applicant Response
	
(d) Consider measures to maintain a reasonable level of privacy between the communal areas on levels 04 and 05 and adjacent units.	There is adequate privacy provided between the communal areas on Levels 04 and 05 and adjacent units, with units located to not create any privacy concerns. It is noted that only one (1) unit, being Unit A013 on Level 01, directly faces into the Communal Open Space at the same level as the communal areas. Unit A013 is separated from the communal areas by a 2m high privacy screen to its private open space set within a planter bed of up to 5m in depth. Refer to the following extract for reference. 

Matter Raised	Applicant Response
3. Landscaping	
(a) Revise the Landscape Plan and Arborist Report to reflect that Strathfield Council does not support the removal of the Council-owned street tree (No. 2 Tristaniopsis laurina) on Pilgrim Ave. It should be retained and protected through the integration of street parking.	Strathfield Council's desire to retain Tree 2 is acknowledged. However, the design team consider its removal desirable for the following reasons: • The project design includes a complete reworking of the street verge along the southern side of Pilgrim Avenue; • The upgrade of Pilgrim Avenue has been designed as an integrated package of works, including: - Widening of the verge; - Creation of new parking bays; - Increasing the effective kerb-to-kerb width of Pilgrim Avenue from approximately 6.5 m to 8.5 m, providing notable improvements to traffic movement and vehicle manoeuvrability within the street; - Provision of a coherent and consistent planting scheme (both tree and verge planting) for the length of the southern side of the street; and - Planting of 7 new street trees (4 Corymbia citriodora – Lemon Scented Gum & 3 Tristaniopsis laurina – Water Gum) Tree 2 (Tristaniopsis laurina - Water Gum) is to be replaced with four (4) equally suitable street trees (Corymbia citriodora – Lemon Scented Gum) in the same general location. Over the long term, these replacement trees are expected to deliver greater canopy coverage and enhance the continuity and amenity of the streetscape. These works will collectively enhance pedestrian safety and accessibility, as well as the overall streetscape. For context, retention of Tree 2 would: • Undermine the landscape quality of the proposed re-working of Pilgrim Avenue • Significantly impact the location and design of the proposed footpath and street verge • Result in the potential loss of two on-street parking spaces and two street trees Due to the extent of excavation and hard-paved surfaces associated with the proposed on-street parking spaces, the root zones of Tree T2 are expected to be significantly impacted. The arborist for the project, Birds Tree Consultancy, has provided the following advice: *With regard to potential design amendments to retain T2, consideration is made that the tree is currently located at grade in an unpaved grassed area within the public domain and root development is probable within the Notional Root Zone (NRZ) of the tree in accordance with AS4970-2025. Any proposed amended pavement design would need to accommodate the existing root crown and root development within the NRZ.*

Matter Raised	Applicant Response
	Possible permeable pavement solutions need to accommodate these roots. Typically proprietary permeable pavement solutions require a depth of profile that would require significant excavation and therefore damage to the existing roots within the NRZ and also the Structural Root Zone (SRZ) as defined by AS4970-2025 and therefore make this tree not viable to be retained. As noted above, while Council has suggested the use of permeable pavement alternatives, most proprietary systems require a depth of sub-base that cannot be accommodated within this context without compromising the tree's root zones. On balance, the design team believe the replacement of Tree 2 will have a superior medium and long-term outcome for Pilgrim Avenue including greater canopy coverage. It is important to note that Tree 2 is located on land owned by the Applicant, not by Council. The Applicant acquired the land from Sydney Trains in order to facilitate access to the Site.
(b) Confirm the area of proposed soft landscaping proposed across the site and investigate opportunities for deep soil.	Although, as noted above, the public verge on Pilgrim Avenue is owned by the applicant and is provided with significant deep soil planting and tree planting, this area is not included in the landscaped area calculations and the project, like most projects of this scale, is based on boundary-to-boundary excavation to limit the number of basements and depth of excavation. To compensate, the project: • Proposes 1,619m^2 of landscaped area (communal open space), equivalent to 56% of the site area, over three (3) levels; • Populates those spaces with a series of planters which: - Occupy 815m^2 / 50% of that space; - Range in depth from 1m to over 3m; - Provide over 880m^2 of soft landscaping which is greater than 30% of the Site; and - Support significant planting including over 30 canopy trees within the Site.
4. GFA and HOB	
(a) Confirm the proposed GFA has been calculated in accordance with the Strathfield LEP. This must include submitting illustrations to clarify that rooms located on Level 00, such as garbage rooms, are wholly contained within the basement.	The updated Architectural Drawings (**Appendix B**) include an updated GFA Plan that revises the Ground Floor GFA calculation in accordance with the *Strathfield Local Environmental Plan 2012*. As a result, the proposed Ground Floor GFA has increased from 386m^2 to 864m^2. Subsequently, the total GFA and FSR has increased, with the FSR increasing from 6.79:1 to 6.96:1. This results in a minor increase to the proposed exceedance of the FSR development standard, with an updated Clause 4.6 Variation Request (**Appendix C**) addressing the subsequent increase. The proposed increase represents a minor change and inclusion of area that supports the operation of the building and will not increase any associated impacts to that previously

Matter Raised	Applicant Response
	assessed in the EIS. In particular, it is noted that the GFA increase relates solely to the ground floor back of house areas and does not change the massing or form of the building in any way.
(b) Annotate on the Section and Elevation Plans the maximum height line of 70.2m and show the existing ground level to confirm the proposed building heights.	The updated Architectural Drawings (**Appendix B**) include revised Section and Elevation Plans that depict the existing ground line and proposed maximum building height.
5. Flooding	
(a) Update Flooding Impact Assessment Report (FIAR) to address the concerns raised by CPHR, the SES and Strathfield Council including the consideration of the impacts of climate change.	As outlined in the Flooding Response Letter (**Appendix E**), the Powells Creek and Saleyards Creek Flood Study model (WMA Water, November 2016) has been requested from WMA Water. However, no response has been received to date. Multiple formal requests and follow-up emails have been sent to WMA Water between October and November 2025, seeking access to the model data, with no reply to date. Copies of the correspondence are provided in Appendix A of the Flooding Response Letter (**Appendix E**). Accordingly, the assessment continues to rely on the local hydraulic model previously reviewed and approved by Strathfield Council as part of Development Application (DA2020/256) (September 2021). This model has been utilised for hydraulic simulations under both existing and proposed conditions. It remains suitable for assessing flood behaviour at the site as: • There have been no significant changes to the catchment or site conditions; and • The model represents flood behaviour that is sufficient to address all other food related comments raised by DPHI, SES, and Council. While climate change and PMF runs have not been included in the current model, these can be incorporated in a future update. In the interim, PMF levels have been referenced from the adopted Powells Creek and Saleyards Creek Flood Study, which indicate a PMF level of RL 12.10m AHD at the subject site. This level is sufficient for assessing flood risk and evacuation safety, as it allows the proposed safe refuge level to be directly compared against the maximum PMF level.
(b) Review the updated FIAR and incorporate recommendations into the building design, including finish floor levels and driveway crest levels.	As outlined in the Flooding Response Letter (**Appendix E**), the proposed floor levels will be designed in accordance with Strathfield Council's DCP requirements: • Minimum habitable floor level: 1% AEP flood level + 0.5 m freeboard; • Minimum non-habitable floor level: 1% AEP flood level + 0.3 m freeboard; and • Minimum driveway crest level: 1% AEP flood level + 0.5 m freeboard. In accordance with these criteria, the minimum required habitable floor level is RL 10.40m AHD, and the proposed design is set at FFL 10.46m AHD, satisfying Council's requirements. Similarly, the minimum required crest level to prevent water entry into the basement is RL 9.90m AHD, and the proposed design provides a crest level of RL 10.46m AHD, which exceeds the required

Matter Raised	Applicant Response
	level. These design levels ensure that the proposed development maintains adequate flood protection, consistent with Council's flood planning and safety requirements.
6. Groundwater and aquifer interference	
(a) Confirm whether the proposed basement will be tanked to allow for estimation of groundwater take. *(b) Provide further information and analysis on inflows for proposed construction and during operation/occupation of the development to address NSW DCCEEW Water Group's concerns.* *(c) Confirm if the take of groundwater is greater than 3ML per year. If so, submit an assessment of impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and Framework 2012.*	As identified in the Geotechnical Response Letter (**Appendix G**), EI Australia is currently undertaking additional geotechnical and hydrological investigations to address the following comment. Due to the scope required, this investigation and assessment will take approximately 4 months for the geotechnical engineer (EI Australia) to complete drilling works, conduct sampling, laboratory analysis, data interpretation, reporting and submission. The Proposal will include a drained basement. The drilling works have been completed with sampling, analysis and data interpretation expected to take a further four (4) months. It is expected a full hydrogeological assessment will be complete to support the Proposal and proposed drained basement by late February 2026. The Applicant requests that confirmation of the potential inflow volumes and requirement for a Water Access License is provided in accordance with a condition of consent Further, a Water Access License will be (if required) obtained from the relevant water source authority, unless an exemption applies (if water take is less than or equal to 3ML/year). This requirement can form a condition of Development Consent.
7. Contamination	
(a) Undertake a Site Contamination Assessment in accordance with the NSW EPA Guidelines and SEPP (Resilience and Hazards) 2021, to assess the potential for soil or groundwater contamination resulting from historical or ongoing activities at the adjoining service station and any acid sulfate soil. This may include adding to the Preliminary Site Investigation and/or submitting a Site Management Plan and Remedial Action Plan.	As outlined in the Contamination Response Letter (**Appendix H**), the investigations were undertaken in accordance with the *Consultants Reporting on Contaminated Land Guidelines* (EPA, 2020), *Sampling Design Guidelines* (EPA, 2022), and *Clause 4.6 of the State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) because: 1. Compliance with reporting standards: Both the Preliminary Site Investigation (PSI) and Additional Site Investigation ASI) were prepared following the structure, content, and reporting requirements outlined in the EPA (2020) Consultants Reporting on Contaminated Land Guidelines. This ensured the reports contained a clear scope of works, data quality objectives, conceptual site model, and conclusions consistent with regulatory expectations. 2. Scientifically defensible sampling design: The sampling strategy for soil and groundwater was developed and implemented in accordance with the EPA (2022) Sampling Design Guidelines, ensuring representative data collection, appropriate spatial coverage, and statistical robustness. This approach provided sufficient confidence in delineating the extent and magnitude of contamination.

Matter Raised	Applicant Response
	3. Consistency with planning requirements: The investigations addressed the requirements of Clause 4.6 of the Resilience and Hazards SEPP, which mandates that land be demonstrated to be suitable (or capable of being made suitable) for its proposed use. The PSI and ASI provided the necessary evidence to inform suitability assessments under this clause. 4. Regulatory and technical alignment: By adhering to these guidelines and legislative instruments, EI Australia ensured that the investigations are technically sound, transparent, and suitable for review by the EPA, planning authorities, and other stakeholders involved in land use and contamination assessment decisions.
(b) Provide an updated Geotechnical Report to include: *i. More recent testing results to confirm current geotechnical conditions of the site.* *ii. additional borehole testing to a depth of 13.5m for the proposed basement, as depths beyond 11.5m where not tested.* *iii. Consideration of any risks posed by vapours, underground storage tanks, or contaminated soil, and provide recommendations for safe excavation and disposal of spoil.*	As identified in the Geotechnical Response Letter (**Appendix G**), EI Australia is currently undertaking additional geotechnical and hydrological investigations to address the following comment. Due to the scope required, this investigation and assessment will take approximately 4 months for the geotechnical engineer (EI Australia) to complete drilling works, conduct sampling, laboratory analysis, data interpretation, reporting and submission. The Proposal will include a drained basement. The drilling works have been completed with sampling, analysis and data interpretation expected to take a further four (4) months. It is expected a full hydrogeological assessment will be complete to support the Proposal and proposed drained basement by late February 2026. The Applicant requests that confirmation of the potential inflow volumes and requirement for a Water Access License is provided in accordance with a condition of consent.
8. Waste	
(a) Revise the proposal to provide waste storage facilities and access for waste collection in accordance with Council's requirements.	The Applicant has addressed Council's comments, as outlined in **Table 4**.
9. Traffic	
(a) Provide evidence of consultation with Transport for NSW regarding the subject site being within an area under investigation for the Strategic Cycleway Corridors Program.	The Applicant contacted Transport for NSW on 22 August 2025 in relation to the strategic cycleway corridors program. A representative from Transport for NSW responded on 25 August 2025 and advised there was currently no further information to share. Refer to correspondence provided at **Appendix K**.

4.2 Strathfield Council

The Applicant's response to the matters raised in Strathfield Council's submission dated 29 August 2025 are provided in **Table 4** below.

Table 4 Response to Strathfield Council Submission

Matter Raised	Applicant Response
Urban Design	
Further assessment is required to adequately demonstrate how the proposal will integrate with the surrounding streetscape, particularly noting its interface with surrounding residential areas (including views across the railway line). *The following considerations should be made:* • *Additional visual impact assessment should consider views with and without tree cover on the site in order to provide a more accurate representation of how the development will appear from all views looking toward the site.*	The Proposal is located within the Strathfield Town Centre which supports the development of shop-top housing to strengthen the town centre's economic output as well as providing new housing. The Proposal's interaction within the surrounding area is in keeping with the future desired character and the NSW Government's desire for housing in well-located areas. A detailed assessment is provided within the Visual Impact Response Letter (**Appendix D**) prepared by de Witt Consulting. It outlines that the Proposal integrates with the surrounding streetscape by acting as a transitional element between the higher-density Strathfield local centre and the adjacent low to medium-density residential areas. In addition, the design incorporates contemporary materials, colours, and integrated landscaping to complement the existing and desired future character of the area. The development's scale and form align with the strategic planning framework, which anticipates ongoing densification in the Strathfield area. This is depicted in eight (8) perspectives views prepared, which have been carefully developed to: • Show the project from a range of angles including surrounding streets and the railway line; • Give a realistic representation of the building as it will appear on completion; and • Show the appearance of the building without masking. The perspectives do not use trees to 'mask' the building. The trees represented are either the existing trees or the proposed trees shown at a relatively early stage of development. On this basis, the Proposal is considered to appropriately integrate with the surrounding streetscape.
With regard to internal amenity of the development, the following should also be considered: • *Winter garden design should be more carefully considered with specific regards to maintaining cross ventilation whilst addressing anti-throw requirements for the adjoining railway line.*	The wintergardens have been designed specifically to address both anti throw and cross ventilation. They are to be fitted with operable louvres above a fixed glass balustrade (850mm) which will be restricted to a maximum 80mm opening in accordance with DPHI's *Development Near Rail Corridors and Busy Roads – Interim Guideline.* Windtech, the ventilation consultants on the project, have advised that louvre openings of this dimension provide sufficient ventilation to enable cross ventilation through the apartments. This approach ensures that amenity is maintained whilst also satisfying the anti-throw requirements set out in DPHI's *Development Near Rail Corridors and Busy Roads – Interim*

Matter Raised	Applicant Response
	Guideline. Refer to DA0652.1 of the updated Architectural Drawings (**Appendix B**) for further details.
• *Council does not support cross-ventilation via plenums. It is strongly recommended that apartments are converted (where possible) into 2-storey 3+ bedroom units in order to achieve the following:* - *Cross-ventilation (single aspect 2-storey is considered cross-ventilated in the ADG* - *Increase the % of 3-bedders. 7% is not close enough to a minimum 10% in the ADG, Homebush TOD's 20% mandate and Strathfield councils own strategic plan.*	The use of plenums to achieve natural and cross ventilation in high rise developments is a widely accepted industry practice supported by both local government and the Land & Environment Court. Most developments of the scale of this project rely on some form of plenum for a limited number of units. In this project, of the 96 apartments within the first nine storeys of the development only three (3) units, Units A 013, A 023 & A033, (2%) rely on the use of plenums for natural and cross ventilation to comply with ADG minimum requirement that 60% of units be naturally cross-ventilated. That is, the use of plenums has been limited to a very small proportion of units and applied only where necessary. A further nine (9) units (the units facing Albert Road) incorporate a combination of operable windows and plenums to achieve cross ventilation in all conditions. The use of plenums is a widely accepted mechanism for delivering natural ventilation to high density urban developments. Windtech, the ventilation consultants on the project, have reviewed the proposed unit configuration and plenum design and confirmed that the plenums will provide sufficient ventilation to meet the objectives of the ADG. The use of plenums has been limited to a small proportion of units and applied only where necessary, ensuring full compliance while preserving the integrity of the overall apartment mix. Multiple detailed wind tunnel studies have been undertaken to verify the effectiveness of horizontal plenums for use as natural cross-ventilation. These studies have confirmed the minimum sizing requirements to ensure their effectiveness as mitigation devices. Previously approved SSD projects which include plenums to achieve cross-ventilation that Windtech has worked on include 136 - 148 New South Head Road, Edgecliff (SSD-77608714) and Hills Showground Precinct East (SSD-62802207). Note that we have proposed the inclusion of horizontal plenums in numerous other SSD and non-SSD projects which are yet to be determined.
Landscaping	
The increase in street trees along Albert Road and Pilgrim Avenue is generally supported. Tree 2 Tristaniopsis laurina (SRZ 2.76m TPZ 6.4m) located on Pilgrim Avenue is to be retained and protected as it appears to be in good health and condition. The tree provides a remarkable canopy for its	The upgrade of Pilgrim Avenue has been designed as an integrated package of works, including substantial tree and verge planting. The Proposal incorporates significant upgrades that will deliver substantial public benefit, including a widened footpath, integrated landscaping

Matter Raised	Applicant Response
species, contributing to the urban canopy coverage of Strathfield. Note from onsite inspection canopy does not overhang development boundary. *The architecture/landscape drawings propose removal of Tree 2 to incorporate on street parking. Council would like to see the integration of street parking that retains the tree. Please refer to example below of Watsons Street, Neutral Bay where raised permeable pavement parking spaces have been integrated with retention of the existing Brush box street trees.*	treatments, new street tree plantings, and formalised on-street parking within the street verge and between the proposed new trees. These works will collectively enhance pedestrian safety, accessibility, and the overall streetscape, while effectively increasing the kerb-to-kerb width of Pilgrim Avenue from approximately 6.5m to 8.5m. This provides notable improvements to traffic movement and vehicle manoeuvrability within the street. The potential to retain Tree 2 within these works has been reviewed in detail by the project arborist and project team. Due to the extent of excavation and hard-paved surfaces associated with the proposed on-street parking spaces, the root zones of Tree 2 are expected to be significantly impacted. With regard to potential design amendments to retain Tree 2, consideration is made that the tree is currently located at grade in an unpaved grassed area within the public domain and root development is probable within the Notional Root Zone (NRZ) of the tree in accordance with AS4970-2025. Any proposed amended pavement design would need to accommodate the existing root crown and root development within the NRZ. Possible permeable pavement solutions need to accommodate these roots. Typically, proprietary permeable pavement solutions require a depth of profile that would require significant excavation and therefore damage to the existing roots within the NRZ and also the Structural Root Zone (SRZ) as defined by AS4970-2025 and therefore make this tree not viable to be retained. In lieu of retaining Tree 2, four (4) new Lemon Scented Gums are proposed along the southern portion of Pilgrim Avenue. Over the long term, these replacement trees are expected to deliver greater canopy coverage and enhance the continuity and amenity of the streetscape. The overall benefits of this strategy will, in the long term, provide a superior outcome than retaining Tree 2.
In addition to the above, the application should include the following information: • *Trees on neighbouring property 9 Albert Rd, Strathfield NSW 2135 (Petrol Station)* • *The development will impact trees neighbouring the site* • *The proposed excavation for the basement levels can potentially have significant impact on trees within the petrol station bordering the development. Trees impacted include T27-T34 and T3-10.* • *It is unclear as to what impact the development will have on the root systems. There is an existing retaining wall unknown if tree roots are beyond that.* • *Impact of solar access and wind conditions will be significantly altered for neighbouring and street trees.* • *Construction of the development will have significant impact on the canopies of the trees. It appears that extensive canopy pruning will be required.*	The gazetted Planning Proposal (PP-2020-178) considered the adjoining service station site at 9 Albert Road, Strathfield, and resulted in a Site-Specific DCP covering both properties. The Planning Proposal and DCP both anticipate coordinated redevelopment across the two (2) sites, including: • Future redevelopment of 9 Albert Road, the service station site, with zero-lot boundary construction anticipated along the shared interface for the extent of the Ground Floor to Podium Level; and • Vehicular access to 9 Albert Road is to be provided from Pilgrim Avenue via the Site along its northern boundary. That is the vehicular entry to the Site will also be the vehicular entry to any future development at 9 Albert Road and when that occurs the existing trees will be removed.

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	The basement design for the proposed scheme is also consistent with the extent of the basement approved under the previous Council DA (DA 2020/256), which was approved with shoring walls built to the boundary of 9 Albert Road. The project arborist has assessed that Trees T3, T6, T8, T9, T27, T28, T29, T30, T31, T32, T33, and T34 are likely to remain viable based on the barrier to root development created by the existing retaining wall and footing.
The proposal should follow a similar setback to that approved under the previous application on the site (DA2020/256). This would enable improved separation from the row of neighbouring trees to 9 Albert Road and will be less likely to adversely impact the root systems along with providing more deep soil zone for the site.	The basement setbacks of the proposed scheme are consistent with those approved under the previous Council DA (DA2020/256). Nil setbacks have been provided to the boundary with 9 Albert Road, the service station site, at ground and podium level to facilitate the future redevelopment of the service station site. This approach aligns with the principles agreed in the approved Planning Proposal and the long-term planning framework for both sites and ensures coordinated development. The impact assessment of the proposed excavation on the roots of trees located on the adjacent 9 Albert Road Service Station was made on the basis of the consideration of the existing masonry walling and associated footings and the physical barrier to root development that this wall and footing provides. This consideration was made under Clause 3.3.4 of AS4970-2009 and now under Clause 3.3.2 of AS4970-2025.
Traffic Assessment	
• *Preparation of a Travel Plan, a key feature of the Travel Plan will include a plan detailing the location of all public transport services10-minuteas key facilities such as banks, post office etc. located within a 5 minute and 10-minute walking radius of the site. This would link up with Council future Cycleway network that will run along the southern side of Albert Road into the Strathfield Town Centre.*	The request for a travel plan is unnecessary, noting the Site's clear and logical connectivity to surrounding transport and services within Strathfield Town Centre. A Traffic and Parking Assessment Report (Appendix P of the EIS) has been produced by Varga which considers the Site's access to transport infrastructure. For context, the Site is located a 3-minute walk from Strathfield Railway Station, 5-minutes from Woolworths, 7-minutes from the Commonwealth Bank and 7-minutes from the Australia Post. On this basis, a travel plan is unnecessary.
• *Working hours should be as per the approved consent conditions which in Strathfield LGA are typically between 7:00am to 5:00pm Monday to Friday and 8:00am to 1:00pm on Saturday. No work is to be carried out on Sundays or Public Holidays.*	Noted. The Applicant raises no objection to the subject construction hours, with works inaudible to surrounding sensitive receivers to be permitted outside these hours.
• *A Works Zone will need to be implemented along the eastern side of Pilgrim Avenue to facilitate ease of construction. The Works Zone parking restrictions, if required, would apply during working hours only and are provided specifically for the set down and pick-up of materials and not for the parking of private vehicles associated with the site.*	Noted. A works zone permit will be applied for prior to commencement of construction.

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Development Engineering	
The flood study stated that there are no differences in flood levels between existing and proposed developed conditions, except some ponding up to 350mm in pockets. *It concluded that there was a decrease of up to 47mm at Albert St, and in the same conclusion an increase of up to 300mm at the southeastern and southwestern corners (basically Albert St frontage).* *The overland flood levels range between RL 19.4m AHD and RL 19.9m AHD. While the proposed ground floor levels appear to be above the flood levels, the study stated there was no need to set a minimum crest level in the driveway leading to the 4-level basement. Architectural plans show the driveway level below the flood level.* *The driveway should have a crest level of a minimum RL 9.9m AHD located at least 2m inside the boundary line.*	As outlined in the Flooding Response Letter (**Appendix E**) prepared by Telford Civil, the proposed floor levels will be designed in accordance with Strathfield Council's DCP requirements. In accordance with these criteria, the minimum required habitable floor level is RL 10.40m AHD, and the proposed design is set at FFL 10.46m AHD, satisfying Council's requirements. Similarly, the minimum required crest level to prevent water entry into the basement is RL 9.90m AHD, and the proposed design provides a crest level of RL 10.46m AHD, which exceeds the required level. These design levels ensure that the proposed development maintains adequate flood protection, consistent with Council's flood planning and safety requirements.
The Geotechnical Investigation report stated that the basement level is about 13.5m below ground level. However, Borehole depths stopped at 11-11.5m below ground level. There was no indication of action to be taken to assess the last 2m. *The following amendments are required before the proposal can be supported in this regard:* • *Clarification as to whether the flood levels increasing or decreasing at Albert Road frontage.* • *Provision of crest in the driveway at a minimum RL 9.9m AHD, to be located inside the property.* • *Statement regarding the assessment of the last 2m of excavation depth.*	As identified in the Geotechnical Response Letter (**Appendix G**), EI Australia is currently undertaking additional geotechnical and hydrological investigations to address the following comment. Due to the scope required, this investigation and assessment will take approximately 4 months for the geotechnical engineer (EI Australia) to complete drilling works, conduct sampling, laboratory analysis, data interpretation, reporting and submission. The drilling works have been completed with sampling, analysis and data interpretation expected to take a further four (4) months. It is expected a full hydrogeological assessment will be complete to support the proposed development and proposed drained basement by late February 2026. This requirement can form a condition of Development Consent and should not withhold Development Consent being granted to SSD-80432461.
Environmental Health	
Clarification of Proposed Uses	
The final development application must clearly define all proposed land uses within the development, including but not limited to: • *Commercial and retail tenancies* • *Communal and rooftop spaces* • *Parking areas (including loading dock operations, deliveries etc.)* • *Plant and mechanical equipment areas*	The proposed land uses and development details are clearly identified on the submitted Architectural Drawings (Appendix B of the EIS). It is noted that outdoor lighting for the two (2) commercial tenants will be located in an undercover veranda surrounded by landscaping. Further, any lighting would be downlit and not be directly exposed to residences. Therefore, a visual assessment for the outdoor lighting is not necessary.

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• *A full description, specifications and management / maintenance plan of the reduction noise fencing / screens (refer to Section 8.1.2) sound barrier placement around the perimeter of the communal area.* • *Visual assessment for outdoor lighting (reference to 2 commercial tenancies).*	
Mechanical Plants Recommendations	
• *Prior to CC, the locations of mechanical plants such as ventilation for the underground carpark and air conditioning units are to be identified on the plans, with the appropriate acoustic screening where applicable and submitted to Council for assessment of suitability.*	Noted. The following information would be incorporated and detailed prior to the issue of a Construction Certificate.
• *All AC Condenser Units and outdoor air-conditioning units to be acoustically enclosed or set away by more than 3.0m from any boundary with a sound power level of each unit no more than 65 dB(A). Submission of a full description, specification and management / maintenance plan of acoustic attenuation and locations.*	The AC Condenser Units are located on Level 01 in three (3) internal plant areas (behind a louvred wall) or on the roof, With the exception of a small number of units facing Pilgrim Avenue on Level 01, all are a minimum of 3m from a boundary, including the boundary with the railway line. The non-compliant units on Level 01 are attached to a plant area which can be amended to ensure the A/c units are a minimum of 3m from the boundary. This can be confirmed via a condition of consent.
Acid Sulfate Soils	
• *An assessment in relation to contaminated lands and acid sulfate soils, where excavation is concerned in relation to the underground carpark.*	An assessment against Acid Sulfate Soils was conducted in the EIS which found the site as comprising Class 5. However, the Site is not located within 500m of Class 1, 2, 3 or 4 land. Therefore, no further consideration is required. Further, a detailed acoustic assessment would be carried out prior to the issue of a Construction Certificate to include all detailed plant specifications.
Acoustic Matters	
• *An acoustic assessment of the proposed development has been previously carried out as part of a previous approved DA by Dural Group (Revised November 29th, 2021). The unattended noise measurements were carried out fronting the Railway line at Point A form 05.11.2020 till 12.11.2020 and facing the existing Service Station, and Raw Square in the line of Site of Albert St at Point B A form 10.06.2021 till 17.06.2021.* • *On the 5th and 8th of November 2024 (over 4 days), an engineer from this office visited the site and carried out noise measurements to verify the noise results carried out by Dural Group. However, the background noise testing component of the assessment is to be carried out over a*	The Acoustic Report (Appendix Q of the EIS) adopted noise readings from the previously approved acoustic assessment associated with DA2020/256. To verify the results, Acoustic Solutions undertook a further four (4) days of noise monitoring. The Acoustic Response Letter (**Appendix F**) outlines the noise monitoring result carried out by Acoustic Solutions (November 2024) and Dural Group (November 2021). It confirms that the results have remained consistent with the outcomes of previous modelling and therefore reinforce the fact that the noise monitoring results accurately depict the existing noise environment. On this basis, additional noise monitoring is not considered warranted as it won't provide any further information that would change the outcome of the analysis.

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minimum of five (5) days as the development is located near a railway line, which can potentially create noise above normal background level.	
• *Acoustic report assessing the potential noise impacts during evening hours to the proposed 10:00pm.*	The Acoustic Report (Appendix Q of the EIS) addressed the Internal noise limits from the railway line during the day and night-time in accordance with Table 3.1 listed on Page 19 of the *Development Near Rail Corridors and Busy Roads – Interim Guideline*. To meet the required internal noise limits, the façade and glazing requirements presented in Table 5.1 of Acoustic Report will be incorporated.
Acoustic Consultant Qualifications and Reporting Requirements	
It is noted that ANAVS does not appear on the list of members of the Association of Australasian Acoustical Consultants (AAAC). An acoustic report should be prepared by an appropriately qualified acoustic consultant who meets the technical eligibility criteria required for membership of the AAAC and/or holds Member grade of the Australian Acoustical Society (MAAS).	The submitted Acoustic Report (Appendix Q of the EIS) was prepared by Moussa Zaioor, a Member of the Australian Acoustical Society since 2008 (membership number 1032). The details and qualifications of the authors were provided on Page 3 of the Acoustic Report.
The acoustic assessment must address the following key areas: • *Noise intrusion from the adjacent rail line, with reference to compliance with the State Environmental Planning Policy (Infrastructure) 2007.* • *Noise emissions generated by the development, including but not limited to: Mechanical plant (e.g. air conditioning units, roller doors)* • *Ventilation systems for the underground car park* • *Noise and vibration impacts associated with demolition and construction activities*	As outlined in the Acoustic Response Letter (**Appendix F**), there are currently no confirmed details or specifications for the mechanical plant associated with the Proposal. Once confirmed during the detailed design phase, a detailed acoustic assessment would be carried out prior to the issue of a Construction Certificate to include all detailed plant specifications.
The report must be prepared in accordance with the following relevant guidelines: • *NSW Environment Protection Authority (EPA) Industrial Noise Policy* • *NSW Department of Planning and Infrastructure – Development Near Rail Corridors and Busy Roads: Interim Guideline* • *NSW EPA Interim Construction Noise Guideline* *Compliance with these standards is essential to ensure a robust and reliable assessment of noise impacts and the implementation of appropriate mitigation strategies.*	Acoustics Solutions confirms that the Acoustic Report (Appendix Q of the EIS) has been prepared in accordance with the subject requirements. Refer to the Acoustic Response Letter (**Appendix F**).

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Plan of Management	
The PoM is essential for understanding how the proposed use will be managed on an ongoing basis. At a minimum, it should include: • *Hours of operation – to assess potential amenity impacts on nearby residents and land uses.* • *Complaint management system – to ensure there is a clear, accountable process for responding to any community concerns.*	It is expected that the Development Consent will not include consent for first use, fit-out or operating hours of the commercial tenancies. A separate assessment and approval of the tenancies will be required. Further, it is expected that an Operational Plan of Management will be prepared in accordance with a condition of consent.
Proximity to Adjacent Petrol Station – Excavation Considerations	
It is noted that there is a petrol station located adjacent to the site. This presents potential contamination and safety risks, particularly in relation to excavation activities associated with the proposed development.	To assess the potential risk from the service station, two (2) investigations were undertaken by El Australia, a Preliminary Site Investigation (PSI) and an Additional Site Investigation (ASI) were prepared. The investigations included soil and groundwater sampling and based on the analytical results, petroleum hydrocarbons were below detection limits and/or below the adopted criteria in both soil and groundwater, indicating that the service station is unlikely to pose a contamination risk for the Site. Refer to the Contamination Response Letter (**Appendix H**).
Given the nature of the neighbouring land use, the following should be addressed: • *A Contamination Assessment should be undertaken in accordance with the NSW EPA Guidelines and SEPP (Resilience and Hazards) 2021, to assess the potential for soil or groundwater contamination resulting from historical or ongoing activities at the adjoining service station.*	The investigations were undertaken in accordance with the *Consultants Reporting on Contaminated Land Guidelines* (EPA, 2020), *Sampling Design Guidelines* (EPA, 2022), and *Clause 4.6 of the State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) because: 1. Compliance with reporting standards: Both the PSI and ASI were prepared following the structure, content, and reporting requirements outlined in the EPA (2020) Consultants Reporting on Contaminated Land Guidelines. This ensured the reports contained a clear scope of works, data quality objectives, conceptual site model, and conclusions consistent with regulatory expectations. 2. Scientifically defensible sampling design: The sampling strategy for soil and groundwater was developed and implemented in accordance with the EPA (2022) Sampling Design Guidelines, ensuring representative data collection, appropriate spatial coverage, and statistical robustness. This approach provided sufficient confidence in delineating the extent and magnitude of contamination. 3. Consistency with planning requirements: The investigations addressed the requirements of Clause 4.6 of the Resilience and Hazards SEPP, which mandates that land be demonstrated to be suitable (or capable of being made

Matter Raised	Applicant Response
	suitable) for its proposed use. The PSI and ASI provided the necessary evidence to inform suitability assessments under this clause. 4. Regulatory and technical alignment: By adhering to these guidelines and legislative instruments, EI Australia ensured that the investigations are technically sound, transparent, and suitable for review by the EPA, planning authorities, and other stakeholders involved in land use and contamination assessment decisions. Refer to the Contamination Response Letter (**Appendix H**).
• *The Geotechnical and Environmental Reports should consider any risks posed by vapours, underground storage tanks, or contaminated soil, and provide recommendations for safe excavation and disposal of spoil.*	As outlined in the Contamination Response Letter (**Appendix H**), petroleum hydrocarbon concentrations and other volatile organic compounds were low and below the adopted site suitability criteria. EI Australia considers the potential human health and environmental risks to be low and acceptable.
• *A Site Management Plan should be prepared to outline procedures for excavation, including safety measures, monitoring, and mitigation of potential contamination or vapour intrusion during construction.*	Based on findings of the ASI and PSI, the Site did not identify contamination warranting remediation. Therefore, the Construction Environmental Management Plan (CEMP) should include a waste classification system for surplus soils to be excavated and a procedure of how to properly address any unexpected contamination if encountered during construction. It is noted that preparation of a CEMP is not required at the Development Application stage, with the CEMP to form part of a Construction Certificate requirement. Refer to the Contamination Response Letter (**Appendix H**) prepared by EI Australia.
• *Include details of a Remediation plan. The developer must act immediately if contamination is discovered during excavation near a petrol station. In the event that contamination is confirmed, a remediation plan must be developed and approved.* *This may involve:* • *Excavating and removing contaminated soil.* • *Treating groundwater.* • *Installing barriers or vapor mitigation systems.* *These considerations are essential to ensure the health and safety of workers, future occupants, and the surrounding community, and to ensure compliance with relevant planning and environmental requirements.*	Based on the findings of the PSI and ASI, the site conditions do not warrant the preparation of a Remediation Action Plan (RAP). EI Australia recommends that an Unexpected Finds Protocol (UFP), which outlines the requirements of what to do if unexpected contamination is identified during redevelopment, be included with the CEMP. Refer to the Contamination Response Letter (**Appendix H**).
Preliminary Site Investigation – Contamination and Remediation Considerations	
The Preliminary Site Investigation dated 31 March 2025 includes limited sampling and identifies the need for further investigation and risk management measures prior to redevelopment. Given the	Following completion of the PSI, an ASI was undertaken. Based on the findings of the ASI, the human health risks associated with the proposed development are considered low, and the site

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proximity of the adjoining petrol station and the proposed basement excavation, a number of critical actions are recommended to manage potential environmental and human health risks: • *Hazardous Materials Survey Prior to any demolition works, a Hazardous Materials Survey must be carried out on all existing site structures to identify potentially hazardous building materials, such as but not limited to asbestos, lead-based paint, or synthetic mineral fibres, that could be released during demolition.*	is suitable for the intended use. It is agreed that a Hazardous Materials Survey should be carried out prior to the commencement of demolition. Refer to the Contamination Response Letter (**Appendix H**).
• *Review of Adjacent Service Station Reports A review of available environmental and contamination reports previously prepared for the adjoining service station site should be undertaken to inform risk assessments and guide remedial strategies.*	It is understood that the client has made contact with the neighbouring service station for environmental reports, however, these were not provided at the time of writing this report. However, it is noted that the Site is not listed on the NSW EPA's List of Contaminated Sites under Section 60 of the Contaminated Land Management Act 1997. In addition, no impacts from the service station entering the site were identified as part of the PSI and ASI. Refer to the Contamination Response Letter (**Appendix H**).
• *Preparation and Implementation of a Remedial Action Plan (RAP)*	Based on the findings of the PSI and ASI, preparation of a RAP is not considered necessary. EI Australia recommends that an Unexpected Finds Protocol (UFP), which outlines the requirements of what to do if unexpected contamination is identified during redevelopment, be included with the CEMP. Refer to the Contamination Response Letter (**Appendix H**).
• *A comprehensive Remedial Action Plan (RAP) should be developed to address contamination risks and guide site remediation.*	Based on the findings of the PSI and ASI, preparation of a Remediation Action Plan (RAP) is not considered necessary. EI however consider that an CEMP must be prepared and implemented as part of the proposed redevelopment, which will include the requirement for waste classification of surplus soils to be excavated as part of the proposed development and procedure of how to properly address any unexpected contamination if encountered during construction. Refer to the Contamination Response Letter (**Appendix H**).
• *Supplementary investigations to address the data gaps identified in the Preliminary Site Investigation.*	The ASI was prepared in response to the PSI recommendations, which indicated that additional investigation was required. No additional contamination to soil and groundwater were identified during the ASI and the Site was considered suitable for the Proposal. Refer to the Contamination Response Letter (**Appendix H**).
• *Specific remediation requirements for Underground Petroleum Storage System (UPSS) decommissioning, in accordance with the Protection of the Environment Operations (UPSS) Regulation 2014 and associated EPA guidance documents.*	Underground Storage Tanks (USTs) are not located within the site, rather the neighbouring site. Therefore, remediation of UPSS's during redevelopment is not necessary for the Site. Refer to the Contamination Response Letter (**Appendix H**).
• *Procedures for the classification of excavated soils in line with the NSW EPA Waste Classification Guidelines (2014), to enable proper off-site disposal.*	In accordance with the recommendations of the ASI, all surplus soil must be classified prior to off-site disposal. This classification should be conducted following demolition to allow for a

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	comprehensive assessment. This requirement should be outlined in the CEMP. Refer to the Contamination Response Letter (**Appendix H**).
• *A Sampling and Analysis Quality Plan (SAQP) for validation of all on-site remediation activities.*	Based on the findings of the PSI and ASI, EI considers that a Site Audit Quality Plan (SAQP) for on-site remediation activities is not necessary, as remediation is not warranted a Remediation Action Plan (RAP) is not required. EI Australia however considers that an CEMP must be prepared and implemented as part of the proposed redevelopment, which include the requirement for a waste classification of surplus soils to be excavated as part of the proposed development and procedure of how to properly address any unexpected contamination encountered during construction. Refer to the Contamination Response Letter (**Appendix H**).
Geotechnical Report – Outdated Site Investigation	
It is noted that the geotechnical report references site coring conducted on 26 October 2020 (refer to page 28). This investigation is now almost five years old and may no longer accurately reflect the current site conditions, particularly if there have been changes in the local environment, nearby developments, or ground stability. *It is recommended that the geotechnical report be updated or supplemented with a more recent investigation to ensure that design assumptions for structural, excavation, and foundation works remain valid and compliant with current standards and site conditions.*	As identified in the Geotechnical Response Letter (**Appendix G**), EI Australia is currently undertaking additional geotechnical and hydrological investigations to address the following comment. Due to the scope required, this investigation and assessment will take approximately 4 months for the geotechnical engineer (EI Australia) to complete drilling works, conduct sampling, laboratory analysis, data interpretation, reporting and submission. The drilling works have been completed with sampling, analysis and data interpretation expected to take a further four (4) months. It is expected a full hydrogeological assessment will be complete to support the proposed development and proposed drained basement by late February 2026. The Applicant requests that confirmation of the potential inflow volumes and requirement for a Water Access License is provided in accordance with a condition of consent
Waste Management	
FOGO Waste	
There is a lack of FOGO/FO planning for waste management. NSW EPA's 2030 FOGO mandate means that MUDs will require a FOGO or FO management system. This is a requirement for all Council serviced buildings. The WMP and waste rooms must be flexible enough to deal with the requirements set out by the EPA. Whilst the current DCP and LEP does not detail this, the development must be prepared to have enough space when it is required.	The updated Waste Management Plan (WMP) (**Appendix I**) identifies a FOGO waste management strategy. It includes 240-litre mobile FOGO bins located in the bin compartment on each level of the building. In addition to other waste provisions discussed within the WMP, the project includes: • A community vegetable & herb garden; • A garden store; and • A series of onsite composting bins for use within the development

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Waste Management Plan	
Section 5.5. of the submitted Waste Management Plan should be amended to say the collection frequency is general waste is one (1) service per week and recycling is one (1) per fortnight.	Section 5.5 of the updated WMP (**Appendix I**) has been amended to confirm one (1) collection frequency for general waste.
The waste vehicle must enter and exit in a forward direction from the building.	Section 5.6.5 of the updated WMP (**Appendix I**) confirms all collection vehicles will enter and exit the building in a forward direction. This is confirmed at Appendix C of the Traffic Impact Assessment (Appendix Q of the EIS) which included swept path analysis.
WMP must include a litter management plan in the WMP and outline that the occupant must take all practicable steps to ensure that the area of public footpath or public area adjacent to the premises within a 50m radius is maintained in a clean and tidy condition.	Section 5.9.1 of the updated WMP (**Appendix I**) confirms a Litter Management Program will be developed to ensure that any litter generated from the use of all waste rooms and common areas will be inspected by the Building Manager on a regular basis and all litter will be collected and disposed of appropriately. Further, signs providing information on proper waste management, litter prevention, clean up collection and better recycling will be displayed at various strategic locations across the Site.
Bulky Goods Management	
The bulky goods area is to be managed appropriately by the building manager and they must schedule regular clean up collections with Council in advance. The building should advocate for reuse and repair initiatives in the building to avoid accumulating unnecessary waste. The building manager should oversee the stacking of items in this area to ensure that collection can be done safely by Council staff. *Additional area could be allocated for future recycling initiatives – i.e., in building textile recycling bins or in-house compost areas.*	Noted. Refer to Section 5.7 of the updated WMP (**Appendix I**) for discussion on bulky goods.
Waste Chute System	
In the event of the chute system jamming, the WMP should detail a contingency plan for handling waste that does not cause major disruptions to day-to-day waste management. On site compaction should be considered for a building of this size.	As outlined in Section 4.5.1 of the updated WMP (**Appendix I**), a Chute Management System will be developed and documented to deal with any breakdown or malfunction of the chute system, to ensure that repairs are undertaken immediately. Contingency management plans will be put in place to ensure that there are no major disruptions to the handling and management of waste.
Commercial Recycling Schedule	
I raise concerns regarding the proposed commercial recycling schedule. The collection frequency should be reduced to one service per week. Bin rooms must have adequate capacity to store approximately 835 liters of recycling materials between collections.	The updated Architectural Drawings (**Appendix B**) include waste room capacity consistent with the requirements of the updated WMP (**Appendix I**). All commercial recycling services will be provided by a licensed private waste contractor.

4.3 Government Agencies

The Applicant's response to the matters raised in the government agency advice are provided in **Table 5** below.

Table 5 Response to Government Agency Advice

Matter Raised	Applicant Response
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Conservation Programs, Heritage & Regulation Division (CPHR)	
Flood Risk	
Consideration of Powells Creek Catchment *The FIRA does not consider the information from available studies for the Powells Creek Catchment. Flooding conditions, impacts and risks have not been reported (based on available studies) in the FIRA. The Powells Creek and Saleyards Creek Flood Study (WMA Water, 17 November 2016) is based on a comprehensive assessment of flooding conditions. The report includes maps outlining the flooding characteristics across the catchment, showing the site for the full range of flooding events including the probable maximum flood (PMF) event.* *Strathfield Council is in the process of finalising the Powells Creek Flood Risk Management Study and Plan. Council has flood maps under baseline conditions and the projected climate change scenarios based on the current risk management study. The proponent should review these flood maps and evaluate flooding risks at the site for the full range of flooding events including the PMF event.* *Consideration of climate change* *The site would have a floodwater depth of 0.5m under an 1% AEP event along with hazard levels of H3 and H4. The site would act as a flood storage under an 1% AEP event. The floodwater depth would increase by 0.2m under the projected climate change scenario of SSP2-4.5 by 2100 as outlined within Australian Rainfall an Runoff Version 4.2 (Commonwealth of Australia, Geoscience Australia, 14 May 2019).* *Under the PMF Event, the site would be surrounded by floodwater with a depth of 2m along with hazard levels of H5 and H6. The site would act as a floodway under the PMF event. The floodwater depth would increase by 0.3m in the PMF event under the climate change scenario of SSP2-4.5 in 2100. The site would become a low flood island and low trapped perimeter area under the Flood Emergency Response Classification during the PMF event.*	As outlined in the Flooding Response Letter (**Appendix E**), the Powells Creek and Saleyards Creek Flood Study model (WMA Water, November 2016) has been requested from WMA Water; however, no response has been received to date. Multiple formal requests and follow-up emails have been sent to WMA Water between October 2025 and November 2025 seeking access to the model data, with no reply to date. Copies of the correspondence are provided in Appendix A of the Flooding Response Letter (**Appendix E**). Accordingly, the assessment continues to rely on the local hydraulic model previously reviewed and approved by Strathfield Council as part of Development Application DA2020/256 (September 2021). This model has been utilised for hydraulic simulations under both existing and proposed conditions. It remains suitable for assessing flood behaviour at the site as: • There have been no significant changes to the catchment or site conditions; and • The model represents flood behaviour that is sufficient to address all other flood-related comments raised by DPHI, SES, and Council. While climate change and PMF runs have not been included in the current model, these can be incorporated in a future update. In the interim, PMF levels have been referenced from the adopted Powells Creek and Saleyards Creek Flood Study, which indicate a PMF level of RL 12.10m AHD at the subject site. This level is sufficient for assessing flood risk and evacuation safety, as it allows the proposed safe refuge level to be directly compared against the maximum PMF level.
Consideration of proposed basement carpark *The proposed development includes 4-5 storey basement carparks to service two 20-storey towers with 228 dwellings. These basement 3 carparks would likely be inundated under the PMF event. This may pose safety and life risks to drivers and users of these carparks.*	As outlined in the Flooding Response Letter (**Appendix E**), the proposed floor levels will be designed in accordance with Strathfield Council's DCP requirements: • Minimum habitable floor level: 1% AEP flood level + 0.5 m freeboard; • Minimum non-habitable floor level: 1% AEP flood level + 0.3 m freeboard; and

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Recommended action: *The FIRA should be updated based on completed studies and the study currently being finalised by Strathfield Council for the full range of flooding events including the PMF event.*	• Minimum driveway crest level: 1% AEP flood level + 0.5 m freeboard. In accordance with these criteria, the minimum required habitable floor level is RL 10.40m AHD, and the proposed design is set at FFL 10.46m AHD, satisfying Council's requirements. Similarly, the minimum required crest level to prevent water entry into the basement is RL 9.90m AHD, and the proposed design provides a crest level of RL 10.46m AHD, which exceeds the required level. These design levels ensure that the proposed development maintains adequate flood protection, consistent with Council's flood planning and safety requirements.
Flood Emergency and Response Planning and the Compatibility of Development	
The Flood Emergency Response Plan (FERP) included in the FIRA is not supported. The FERP indicates that the flood emergency management activities would be undertaken by trained personnel and residents. The FERP does not outline the competency and capability of trained personnel. The proposed 20-storey towers would likely be managed by strata managers, who would be unlikely to be well-versed in flood emergency management, nor would future residents. This would pose considerable risks to the future residents of the proposed 228 dwellings. *It would be difficult to evacuate the proposed towers prior to a major flooding event including the PMF event since the Powells Creek Catchment does not have a flood warning system. The site would be rapidly inundated following the onset of a major flooding event. Shelter-in-place would not be permitted for the site due to H5 and H6 hazard levels under the PMF event.* *The proposed development comprising 228 dwellings with commercial space at ground floor is not compatible with the flooding risks. The proposed development would result in the intensification of use on the site and therefore increase the population exposed to flood risk. The development would require significant resources from the emergency management services during major flooding events.* ***Recommended action:*** • *The proponent should review the risk exposure at the site during major flooding events including the PMF event to demonstrate that the proposed development is compatible with the flood risk of the site.* • *The development should demonstrate consistency with the NSW State Emergency Service existing emergency arrangement for the area.*	As outlined in the Flooding Response Letter (**Appendix E**), the minimum required habitable floor level is RL 10.40m AHD, and the proposed design is set at FFL 10.46m AHD, satisfying Council's DCP requirements. Similarly, the minimum required crest level to prevent water entry into the basement is RL 9.90m AHD, and the proposed design provides a crest level of RL 10.46m AHD, which exceeds the required level. Safe refuge is available on-site for both the 1% AEP and PMF flood events, consistent with the previously submitted Flood Impact Assessment (TEL23196.FIA.DA - 11-13 Albert Rd & 2- 6 Pilgrim Ave, Strathfield revA, 20 March 2025). During a 1% AEP event, occupants can relocate to the Ground Floor level, which is situated above the adjacent 1% AEP flood level. In the PMF event, Level 1 (and higher) provides a safe refuge area located above the PMF flood level (RL 12.10m AHD), ensuring vertical evacuation is achievable entirely within the building. While the development's design inherently provides self-contained refuge above PMF flood levels, the FERP will document operational procedures in accordance with SES guidance for completeness and clarity, covering the full range of flood events. A detailed Flood Emergency Response Plan will be prepared at a later stage, aligned with SES guidelines and Council floodplain risk management policies. This is standard practice and will ensure the operational procedures reflect the final building layout, management arrangements and SES guidance current at the time of occupation. The FERP will: • Confirm shelter-in-place arrangements at the designated refuge levels; • Specify warning and communication procedures; • Identify decision points for refuge and evacuation where relevant; and • Clarify roles and responsibilities for building management and occupants. The Proposal adopts a comprehensive flood risk management approach, including: • Shelter-in-place for residents: All habitable apartments within the development are located above both the 1% AEP and PMF levels, inherently providing safe refuge areas for occupants.

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	This ensures vertical evacuation to above-PMF levels is achievable without the need to leave the development. • Shelter-in-place for non-residential uses: For non-residential uses on the ground floor, a fully enclosed and roofed shelter-in-place area will be provided on the first floor (above PMF level). The area will be sized in accordance with standard guidance (2 m² per person) and equipped to accommodate temporary refuge until conditions are deemed safe by emergency authorities.
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group	
Water Supply, Take and Licensing	
Recommendation - pre-determination *The Department of Planning, Housing and Infrastructure (DPHI) should seek from the proponent quantification of the maximum annual volume of water take due to aquifer interference activities and the ability to acquire sufficient water entitlement unless an exemption applies.* Explanation *Insufficient information has been provided to confirm the potential groundwater inflow volumes. NSW DCCEEW Water Group notes that the groundwater table will be intercepted. Maximum excavation depths for this project are 13.4 mbgl. The proponent has not confirmed whether the proposed basements will be drained or tanked, this should be confirmed so that ongoing groundwater take can be estimated. The proponent has not presented sufficient information and analysis on inflows during the construction and ongoing operation of the site. Quantification of maximum potential inflow volumes is required.*	As identified in the Geotechnical Response Letter (**Appendix G**), EI Australia is currently undertaking additional geotechnical and hydrological investigations to address the following comment. Due to the scope required, this investigation and assessment will take approximately 4 months for the geotechnical engineer (EI Australia) to complete drilling works, conduct sampling, laboratory analysis, data interpretation, reporting and submission. The Proposal will include a drained basement. The drilling works have been completed with sampling, analysis and data interpretation expected to take a further four (4) months. It is expected a full hydrogeological assessment will be complete to support the Proposal and proposed drained basement by late February 2026. The Applicant requests that confirmation of the potential inflow volumes and requirement for a Water Access License is provided in accordance with a condition of consent.
Recommendation - post-approval *DPHI should ensure the proponent acquires a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018.* Explanation *Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the Water Management (General) Regulation 2018 applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 2 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 7, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as:*	If required, a Water Access License will be obtained from the relevant water source authority, unless an exemption applies (if water take is less than or equal to 3ML/year). This requirement can form a condition of Development Consent.

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• *the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and* • *the records are kept for 5 years.*	
Groundwater Impacts and Dewatering Requirements	
Recommendation - pre-determination *If the take of groundwater is found to be greater than 3 ML per year, DPHI should seek from the proponent an assessment of impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:* • *https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf* • *https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf* Explanation *As per Recommendation 1.1 above, the proponent has not provided a volumetric quantification of groundwater take. Additionally, the proponent has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.*	As above, a Water Access License will be obtained (if required) from the relevant water source authority, unless an exemption applies (if water take is less than or equal to 3ML/year). The Applicant requests that confirmation of the potential inflow volumes and requirement for a Water Access License is provided in accordance with a condition of consent
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Heritage NSW	
Aboriginal Cultural Heritage	
The ACHA completed to inform the EIS did not identify any Aboriginal objects or areas of archaeological potential within the study area. Heritage NSW broadly agrees with the conclusions of the assessment and its proposed mitigation measures, however, recommends that the Department requests the following information from the proponent to demonstrate that the assessment complies with the relevant guidelines relating to Aboriginal cultural heritage: *1. Evidence demonstrating that all Aboriginal stakeholders identified by relevant statutory agencies were invited to register for consultation on the project.* *2. Evidence demonstrating that all Registered Aboriginal Parties were provided with a copy of the project information and methodology documents, and a copy of the Draft ACHA for their review. This evidence can comprise copies of dated email records with all relevant email addresses shown and/or delivery or read receipts of correspondence.*	The ACHA (Appendix DD of the EIS) included sufficient evidence demonstrating compliance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010c). Appendix 2 of the ACHA (unredacted version) outlines all Aboriginal stakeholders identified by relevant statutory agencies and subsequent consultation. A Draft ACHA was sent to all stakeholders via email on 23 September 2024, with no comments received from the Registered Aboriginal Parties (RAPs).

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Provided these matters can be addressed we have included recommended draft conditions of approval in Attachment A.	The Applicant raises no objections to the recommended draft conditions provided in Attachment A of the Heritage NSW advice dated 8 August 2025.
Environmental Heritage	
The proposed SSD site is adjacent to the State Heritage Register (SHR) curtilages of the Strathfield Railway Station Group (SHR no. 01252) and Strathfield Rail Underbridges (Flyover) (SHR no. 01055). *Heritage NSW notes that the Secretary's Environmental Assessment requirements (SEARS) for the project issued 28 February 2025 include 'where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact'. Section 6.18 of the EIS states that the proposed works will have no direct impact to the significance of the railway station, and notes that the works will change the setting of the item. Given the proximity of the proposed works to these SHR items, and the potential for visual impacts, Heritage NSW recommends that the Department requests additional information from the proponent as outlined below.* *1. A Statement of Heritage Impact (SOHI) prepared by a suitably qualified heritage consultant in accordance with the Guidelines for preparing Statements of Heritage Impact. The SOHI is to address the impacts of the proposal on the heritage significance of the site and adjacent areas and is to identify the following:* *a. all heritage items (state and local) within the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items, and assessment of why the items and site(s) are of heritage significance.* *b. the impacts of the proposal on heritage item(s) including visual impacts.* *c. the attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site and the surrounding heritage items.* *This information is requested to ensure that the impacts of the proposed works have been adequately assessed in accordance with the requirements of the SEARS. Ensuring that the conclusions presented in the EIS are supported, and that appropriate mitigation measures (if required) are established.*	A Heritage Impact Statement (HIS) has been prepared by Urbis and included at **Appendix J**. It includes a detailed assessment of potential environmental heritage impacts associated with the Proposal in accordance with Heritage NSW's advice. The HIS confirms that the Proposal will not have detrimental heritage impact on the Site, nor the heritage listed items located within the vicinity. For further discussion, refer to the HIS (**Appendix J**).
NSW State Emergency Service (SES)	
We note the site is isolated by very frequent flooding, with all surrounding roads becoming inundated in the 50% Annual Exceedance Probability (AEP) event. The site itself becomes inundated during the 10% AEP flood. During the PMF the entire site is inundated to depths in excess of 2 metres with high hazard flooding covering the site and all surrounding roads. *In summary, we recommend:*	As outlined in the Flooding Response Letter (**Appendix E**), the Powells Creek and Saleyards Creek Flood Study model (WMA Water, November 2016) has been requested from WMA Water; however, no response has been received to date. Multiple formal requests and follow-up emails have been sent to WMA Water between October 2025 and November 2025 seeking access to the model data, with no reply to date. Copies of the correspondence are provided in Appendix A of the Flooding Response Letter (**Appendix E**).

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• *Seeking further flood information for the site, instead of focusing only on the 1% Annual Exceedance Probability (AEP) flood including:*
  - *consideration of the full range of flood events, including both more frequent flood events and larger flood events, up to and including the PMF.*
  - *depth, velocity and hydraulic hazard of any flooding across all flood extents.*
  - *time to onset, duration of inundation on the site itself as well as surrounding streets.*
  - *an assessment of the impact of the proposed development on flood behaviour.*
• *Considering the impacts of climate change. It is estimated that the actual probability of a 1 in 100 AEP for this catchment area is approximately a 1 in 37 AEP event for the current 2025 scenario.5 For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.*
	Accordingly, the assessment continues to rely on the local hydraulic model previously reviewed and approved by Strathfield Council as part of Development Application DA2020/256 (September 2021). This model has been utilised for hydraulic simulations under both existing and proposed conditions. It remains suitable for assessing flood behaviour at the site as:
	• There have been no significant changes to the catchment or site conditions; and
	• The model represents flood behaviour that is sufficient to address all other flood-related comments raised by DPHI, SES, and Council.
	While climate change and PMF runs have not been included in the current model, these can be incorporated in a future update. In the interim, PMF levels have been referenced from the adopted Powells Creek and Saleyards Creek Flood Study, which indicate a PMF level of RL 12.10m AHD at the subject site. This level is sufficient for assessing flood risk and evacuation safety, as it allows the proposed safe refuge level to be directly compared against the maximum PMF level.

• *Careful consideration of the suitability of this site for intensification. Due to the high hazard nature of flooding in the area any increase of population in this area will result in an increase in the exposure of people to the flood hazard and an increased likelihood of further requests for assistance from NSW SES.* • *Ensuring that all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF), or reconsidering basement carparking if this is not feasible to reduce risk to life and property.* • *Pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.*	As outlined in the Flooding Response Letter (**Appendix E**), the minimum required habitable floor level is RL 10.40m AHD, and the proposed design is set at FFL 10.46m AHD, satisfying Council's DCP requirements. Similarly, the minimum required crest level to prevent water entry into the basement is RL 9.90m AHD, and the proposed design provides a crest level of RL 10.46m AHD, which exceeds the required level. Safe refuge is available on-site for both the 1% AEP and PMF flood events, consistent with the previously submitted Flood Impact Assessment (TEL23196.FIA.DA - 11-13 Albert Rd & 2- 6 Pilgrim Ave, Strathfield revA, 20 March 2025). During a 1% AEP event, occupants can relocate to the Ground Floor level, which is situated above the adjacent 1% AEP flood level. In the PMF event, Level 1 (and higher) provides a safe refuge area located above the PMF flood level (RL 12.10m AHD), ensuring vertical evacuation is achievable entirely within the building. While the development's design inherently provides self-contained refuge above PMF flood levels, the FERP will document operational procedures in accordance with SES guidance for completeness and clarity, covering the full range of flood events. A detailed Flood Emergency Response Plan will be prepared at a later stage, aligned with SES guidelines and Council floodplain risk management policies. This is standard practice and will ensure the operational procedures reflect the final building layout, management arrangements and SES guidance current at the time of occupation. The FERP will: • Confirm shelter-in-place arrangements at the designated refuge levels; • Specify warning and communication procedures;

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	• Identify decision points for refuge and evacuation where relevant; and • Clarify roles and responsibilities for building management and occupants. The Proposal adopts a comprehensive flood risk management approach, including: • Shelter-in-place for residents: All habitable apartments within the development are located above both the 1% AEP and PMF levels, inherently providing safe refuge areas for occupants. This ensures vertical evacuation to above-PMF levels is achievable without the need to leave the development. • Shelter-in-place for non-residential uses: For non-residential uses on the ground floor, a fully enclosed and roofed shelter-in-place area will be provided on the first floor (above PMF level). The area will be sized in accordance with standard guidance (2 m² per person) and equipped to accommodate temporary refuge until conditions are deemed safe by emergency authorities.
Transport for NSW (Sydney Trains)	
Rail Authority Review	
The Department is advised that TfNSW, via Instrument of Delegation from the Secretary of Transport and from TAM (Transport Asset Manager of NSW), has been delegated to act as the rail authority for the heavy rail corridor, electrical supply authority, and Agent on behalf of the Land Owner; and to process the review of this proposal. *We have reviewed the proposal and advise that in order to protect rail land, assets, operations, and to ensure a safe and reliable rail service, it is requested that the Department consider imposing the conditions as listed in Attachment A. It is requested that these conditions remain as worded and are not amended without consultation with TfNSW (as Rail Authority).* *Where additional information is provided, including as part of any Response to Submissions or where any amendments are made to the proposal, we request notification from the Department in the event these changes may impact the outcome of this letter.*	The Applicant has reviewed the conditions of consent at Attachment A of the Transport for NSW advice dated 26 August 2025 and raises no objections.
Transport for NSW	
Strategic Cycleway Corridors Program	
Comment: *The subject property is within an area under investigation for the Strategic Cycleway Corridors Program. Recommendation:*	The Applicant contacted Transport for NSW on 22 August 2025 in relation to the strategic cycleway corridors program. A representative from Transport for NSW responded on 25 August 2025 and advised there was currently no further information to share. Refer to correspondence provided at **Appendix K**.

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Recommendation: *It is recommended that the Applicant engage with Stephanie Schofield, Project Manager, via email at Stephanie.Schofield@transport.nsw.gov.au for further information regarding this project.*	
TfNSW Concurrence under Section 138 of the Roads Act 1993	
Comment: *Any proposed civil works on Albert Road (regional classified road) requires concurrence from TfNSW under section 138 of the Roads Act 1993, however, the works will need to be undertaken through Council as the relevant Road Authority.* Recommendation: *The associated civil works should be designed and constructed to Council's satisfaction as the relevant Road and Consent Authority.*	Noted.
Sydney Water	
Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent. • *Section 73 Compliance Certificate* • *Building Plan Approval* *Further details of the conditions can be found in Attachment 1.*	Noted.
The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.	Noted.
Ausgrid	
Ausgrid Overhead Powerlines are in the vicinity of the development	
The developer should refer to SafeWork NSW Document – Work Near Overhead Powerlines: Code of Practice. This document outlines the minimum separation requirements between electrical mains (overhead wires) and structures within the development site throughout the construction process. It is a statutory requirement that these distances be maintained throughout the construction phase. *Consideration should be given to the positioning and operating of cranes, scaffolding, and sufficient clearances from all types of vehicles that are expected be entering and leaving the site.*	Noted.

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The "as constructed" minimum clearances to the mains must also be maintained. These distances are outlined in the Ausgrid Network Standard, NS220 Overhead Design Manual. This document can be sourced from Ausgrid's website at www.ausgrid.com.au. *It is the responsibility of the developer to verify and maintain minimum clearances onsite. In the event where minimum safe clearances are not able to be met due to the design of the development, the Ausgrid mains may need to be relocated in this instance. Any Ausgrid asset relocation works will be at the developer's cost.*	
Ausgrid Underground Cables are in the vicinity of the development	
Special care should be taken to ensure that driveways and any other construction activities do not interfere with existing underground cables located in the footpath or adjacent roadways. It is recommended that the developer locate and record the depth of all known underground services prior to any excavation in the area. Information regarding the position of cables along footpaths and roadways can be obtained by contacting Before You Dig Australia (BYDA). *In addition to BYDA the proponent should refer to the following documents to support safety in design and construction:* • *SafeWork Australia – Excavation Code of Practice.* • *Ausgrid's Network Standard NS156 which outlines the minimum requirements for working around Ausgrid's underground cables.* *The following points should also be taken into consideration.* • *Ausgrid cannot guarantee the depth of cables due to possible changes in ground levels from previous activities after the cables were installed.* • *Should ground levels change above Ausgrid's underground cables in areas such as footpaths and driveways, Ausgrid must be notified, and written approval provided prior to the works commencing.* • *Should ground anchors be required in the vicinity of Ausgrid underground cables, the anchors must not be installed within 300mm of any cable, and the anchors must not pass over the top of any cable.*	Noted.
New Driveways - Proximity to Existing Poles	
Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.	Noted.

Matter Raised	Applicant Response
New or modified connection	
To apply to connect or modify a connection for residential or commercial premises. Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable. Visit the Ausgrid website for further details; https://www.ausgrid.com.au/Connections/Get-connected *Additional information can be found in the Ausgrid Quick Reference Guide for Safety Clearances "Working Near Ausgrid Assets - Clearances". This document can be found by visiting the following Ausgrid website: www.ausgrid.com.au/Your-safety/Working-Safe/Clearance-enquiries*	Noted.
NSW Environmental Protection Authority (EPA)	
Based on the information provided, the EPA has no comment on this proposal and no further consultation is required.	Noted.

4.4 Members of the Public

The Applicant's response to the matters raised in the submissions received from members of the public are provided in **Table 6** below.

Table 6 Response to Members of the Public

Matter Raised	Applicant Response
Benjamin Cullen	
I support this project. *Sydney needs more projects like this to boost housing density and address the housing crisis. Its location near public transport makes it ideal for dense urban living.*	Noted. The Proposal includes the delivery of 228 dwellings (incl. 15.3% affordable dwellings) in 200m proximity to Strathfield Station.
Daniel Mendes	
I completely support this project of an additional of two 20-storey mixed use development with shop-top housing including 2 commercial, 228 residential apartments (35 of which are affordable dwellings), four levels of basement and associated services and landscaping. *I believe that this will help improve housing in Strathfield. Also as it is near Strathfield station, it will encourage more people to use public transport.*	Noted. The Proposal will deliver a high level of residential amenity and residents will be provided with communal facilities and open space on Level 1, 4 and 5 which forms the podium roof. The proposed apartments have been designed to maximise views towards the north, south and west as well as maximising natural light and ventilation. A Design Verification Statement has been prepared by Kennedy Associates Architects and is located at Appendix K. It confirms the proposed apartments have been designed to achieve compliance with the Housing SEPP and its accompanying ADG. A detailed assessment against the principles of Housing SEPP, and the objectives and design criteria of the ADG, have been provided within the Design Report.
Name Withheld (1)	
I object to the project for the following reasons: *1. The traffic report is not sufficient. With about 228 housing, the project should include increasing the number of lanes and ensure public safety.* *2. The height of building should remain at 55m. Higher than that is obstructing view from my dwellings.*	The Proposal is located in close proximity to Strathfield Station and enables a reduced private vehicle dependency. It is noted that the target demographic for the proposed development is expected to be students and young professionals who traditionally have a low car ownership rate, particularly those that prefer living close to town centres with excellent public transport services, as supported by the Site. The proposed building height remains unchanged, consistent with the Height of Buildings development standard, with the 30% height bonus permitted under *State Environmental Planning Policy (Housing) 2021*.
Name Withheld (2)	
We have no objection to the number of dwellings proposed and support the affordable housing provisions in the current proposal. However it is difficult to ignore the fact that the massing of this proposal is has a major flaw: • *The proposed height of Tower A is significantly out of character with the height of the surrounding buildings to the east, south-east and south of the site.*	The Proposal is consistent with the desired future character of the Strathfield Town Centre of high-density mixed-use developments in close proximity to Strathfield Station. As outlined in Section 6.2.1 of the EIS, it seeks to increase setbacks to the neighbouring site to the east (currently used as a Shell Service Station) compared to a previously approved Development Application (DA 2020/256), noting it may be redeveloped in the future for residential uses. It therefore improves solar access within the Site and neighbouring site by

Matter Raised	Applicant Response
	reducing building depth, reducing the frontage to the railway corridor, increasing the residential communal space and reducing the number of south facing dwellings.
• *The proposed 20-level height for Tower A will create significant overshadowing impact on the North-west corner apartments at 38-40 Albert Rd Strathfield which currently enjoy adequate solar access in winter and will as a result of this proposal, would be completely blocked by Tower A (where is the shadow analysis for this submission??!!)*	As outlined in Section 6.3.1 of the EIS, the Proposal complies with the permissible height and density controls. Due to the location of the Site and the height of the Proposal, some overshadowing to surrounding properties occurs. However, the 'tower' form causes shadows to shift quickly, limiting impacts on surrounding properties. Building A is set back from Pilgrim Avenue to minimise overshadowing impacts on adjoining developments. The Proposal will cause direct overshadowing impacts on the residential flat building at 38–40 Albert Road and Regal Court throughout the winter solstice. However, given the urban context, the shadow impacts for the development are considered reasonable. Alternative designs have been considered and determined to result in inferior built form and amenity outcomes. From the SDRP Meeting 1 on 20 November 2024, the Government Architect NSW strongly supported the Proposals orientation and massing, inclusion of affordable housing, solar access, ample communal space and integrated landscaping.
• *The significant overshadowing impact of Tower A on the various North-west corner apartments at 38-40 Albert Rd would be significantly mitigated if the height of this southern tower was reduced by 4 levels. The 16 apartments that would be removed from Tower A could easily be accommodated over 2 levels in Tower P. This change will also bring the height of Tower A to be more in line with height of the nearby towers and adding an extra 2 levels to Tower P would not have the same adverse visual impact, nor would it adversely impact solar access to the existing dwellings in this area. This change would also enhance solar access to other existing apartments such as the north-facing apartments belonging to 38-40 Albert Rd, Strathfield.*	
• *With regards to impact on 38-40 Albert Rd, Strathfield, we wish to highlight the importance of maintaining the proposed setback of Tower A from the South-west corner of the site (corner of Albert Road and Pilgrim Avenue) from Level 4 to allow them to retain a reasonable level of solar access to the north-facing apartments in this existing block.*	
• *We hope that the NSW Department of Planning would seriously consider the above change as it would significantly improve the comfort and amenity of the occupants in the existing surrounding buildings as well as the character of this part of Strathfield. Furthermore, we have put forward a solution to this very serious matter that would not adversely impact the applicant or the feasibility of the subject development.*	
Name Withheld (3)	
• *Firstly, If this plan goes ahead, hundreds of residents—many elderly, many on low incomes—will be forced to leave. Compensation will never cover the real cost: the loss of our homes, our stability, and our belonging.*	The Proposal includes the delivery of 35 affordable dwellings which results in a significant net-increase in affordable dwellings provided on the Site. This is in addition to the 193 market apartments that will support increased housing supply within a highly accessible and desired location.
• *Secondly, The units in this area are not derelict. They are liveable, they can be renovated, and they can last for decades more. Demolishing them is wasteful, both*	The Site in its current form is underutilised and does not represent the highest and best use given the location within Strathfield Town Centre and proximity to Strathfield Station. It represents a significant

Matter Raised	Applicant Response
financially and environmentally, generating tonnes of construction waste and destroying embodied carbon.	opportunity to deliver additional housing supply in a highly accessible location, consistent with the current policy objectives of the NSW Government. Further, the Proposal will support ecologically sustainable development through the diversion of demolition and constriction away from landfill, as well as creating more energy efficient dwellings that reduce the net consumption of energy.
• *Thirdly, Perhaps most importantly, our area is already crowded. Adding 228 dwellings without first upgrading roads, public transport, shopping centre, and healthcare will overwhelm our infrastructure. How will we cope with more traffic, longer wait times, and stretched public services? Has the government truly thought about how residents can still live comfortably here?*	The Site is located within Strathfield Town Centre and has been identified for high-density residential development. It represents a highly accessible location that will reduce private vehicle dependency and respond to a clear policy direction from the NSW Government.
• *Fourthly, it would impact our environment a lot. Demolition generates massive amounts of construction waste, contributing to landfill pressure and greenhouse gas emissions. The embodied carbon in existing structures would be lost, and the building of new high-density developments would require fresh materials, further increasing the project's ecological footprint. Plus the removal of the trees could make the situation even worse.*	As outlined in Section 2 and 3 of the Waste Management Plan (**Appendix K**), the waste generated from demolition and construction will largely be diverted from landfill. The Proposal involves the delivery of energy efficient dwellings that reduce the net consumption of energy per dwelling. The amount of tree removal has been minimised to enable suitable redevelopment and significant public domain improvements.
• *In sum, urban planning should focus on improving quality of life without sacrificing the community and environment that define our neighbourhoods. Instead of wholesale demolition, the government should invest in targeted renovations, infrastructure upgrades, and community-driven improvement plans. This approach would preserve social cohesion, protect the environment, and maintain the unique character of the area—ensuring a better future for both current and future residents.*	The Proposal is a direct response to the NSW Government's policy objective of delivering more homes in close proximity to public transport, as well as a significant contribution of affordable dwellings within Strathfield Town Centre.

5.0 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the Applicant's response to these issues.

No additional mitigation measures have been proposed as a result of the additional and revised technical reports. It is noted that any design changes or assessments undertaken are in response to issues raised in submissions or further design development and have not increased the impact of the development.

As such, the justification for the project as previously outlined in the EIS is reiterated and strengthened through the presented responses which comprise meaningful amendments to the Proposal.

5.1 Project Design

The design of the Proposal has responded to the surrounding context, providing an appropriate distribution of mass and overall design of the proposal demonstrates a high standard of design quality to ensure that it is commensurate with the surrounding natural and built environment.

Furthermore, the proposed landscaping will result in an improved outcome for the built environment with its existing condition underutilised and characterised by exotic species. The proposed implementation of ESD measures will also ensure that the Proposal does not have adverse environmental impacts.

5.2 Strategic Context

The Proposal seeks to deliver a mixed use development comprising 228 dwellings including 35 affordable housing dwellings and is the result of a thorough planning process. After careful consideration and analysis, the decision to utilise the NSW Government's affordable housing policy was the most suitable option for this Site for the following reasons:

- It supports the delivery of a 15.35% affordable housing contribution equating to 35 dwellings for very low to moderate income households in a well-located area during a housing affordability crisis;
- It will revitalise an underperforming site in the Strathfield Town Centre with new commercial premises, significant housing contribution and public domain works;
- It will improve the feasibility of redevelopment and ability to off-set current high construction costs; and
- It will deliver more housing supply to the private and affordable housing market, reducing pressure off key-workers ability to find adequate affordable housing in well-located areas.

5.3 Statutory Context

The Proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact. Specifically, the Proposal is consistent with the Objects of the EP&A Act as:

- It positively contributes to housing supply and affordability through the delivery of 35 affordable housing dwellings and 193 build-to-sell dwellings to accommodate the growing population of the Strathfield LGA and Greater Sydney Region more broadly;
- It promotes the orderly and economic use of land by redeveloping an underutilised site to facilitate the highest and best use, providing housing in a highly accessible location;
- It embeds ESD principles through a range of design and operation initiatives;
- It does not result in any adverse impacts to threatened species or ecological communities, as demonstrated by the granted BDAR Waiver;
- It generates employment opportunities during the construction and operational phases;
- It incorporates good design and amenity of the built environment;
- It does not adversely impact Aboriginal cultural heritage and designing with Country has informed the design to ensure it is built into a celebrated within the Proposal; and
- The project team has undertaken consultation and feedback with relevant stakeholders.

5.4 Likely Impacts of the Development

5.4.1 Natural Environment and Built Environment

The Proposal adopts appropriate management strategies and will generate acceptable environmental impacts, due to the proposed mitigation measures and the design of the development.

The Site is located within a highly urbanised built environment, and the Proposal evidently contributes to the Site's capacity to align with the desired future character of the area. The proposed distribution of building mass and overall design of the proposal demonstrates a high standard of design quality to ensure that it is commensurate with the surrounding natural and built environment. Furthermore, the proposed landscaping measures result in an improved outcome for the natural environment of the Site, as its existing condition is underutilised and characterised by exotic species. The proposed implementation of ESD measures will also ensure that the proposed development does not have adverse environmental impacts.

5.4.2 Social and Economic

An assessment of the likely social impacts of the project has been undertaken in the Social Impact Assessment (located at Appendix BB of the EIS). It confirms that the Proposal will generate the following positive social impacts:

- Supply of contemporary, well-located and diverse housing, including affordable housing in the Strathfield LGA;
- Improved urban experience and opportunity to Connect with Country for residents, workers and visitors.
- Economic benefits during construction and operation.

Any negative social impacts arising from the development, including changes to sense of place, cumulative construction impacts and cumulative demand on social infrastructure can be appropriately mitigated through the proposed mitigation measures (located at Appendix E of the EIS).

The Proposal will generate a positive economic impact through the creation of an estimated 221 full time construction jobs. The provision of affordable housing will also have flow on economic benefits as prospective affordable housing residents will be provided with affordable rental rates, reducing the proportion of their income spent on rent.

5.5 Suitability of the Site

Having regard to the characteristics of the Site and its location, the Proposal remains suitable for the Site in that:

- It is located within the MU1 Mixed Use zone, and strongly aligns with the objectives of the zone pursuant to the Strathfield LEP 2012 as it exemplifies a true mixed-use development that integrates both commercial and residential land uses, activating the ground plane;
- In its current form, the Site is underutilised and does not represent the highest and best use with the potential to create a landmark development at the western gateway to the Strathfield Town Centre;
- It is generally compliant with the statutory controls under the Strathfield LEP 2012 and Environmental Planning Instruments;
- It is in close proximity to a range of high-frequency public transport options, including the Strathfield Station, approximately 200m to the east of the Site;
- It responds to the surrounding context by positioning building mass accordingly and strong façade articulation;
- It will not result in any adverse environmental impacts and any impact can be appropriately managed and mitigated;
- It is not affected by significant constraints on the Site such as bushfire hazards, endangered species and contamination or hazardous materials.

5.6 Public Interest

Having regard to the public interest, the Proposal is considered to remain in the public interest for the following reasons:

- It will contribute to the supply of affordable housing in the Strathfield LGA, directly responding to the NSW Government's policy to deliver affordable housing for very low to moderate income households;

- It will provide new housing supply within Strathfield Town Centre, supported by the sites close proximity to Strathfield Station and services within the town centre;
- It will revitalise a currently underutilised strategic site to provide increase amenity to the public domain and activation of the Strathfield Town Centre; and
- It will support convenience for the future and existing residents of the locality through provision of two (2) commercial tenancies, whilst also stimulating the ground plane to create a vibrant and active public domain.

5.7 Conclusion

This Submissions Report has been prepared on behalf of Convertia to address the matters raised during the Public Exhibition of the SSDA (SSD-80432461) for a mixed-use in-fill affordable housing development located at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield.

The Applicant has thoroughly considered the advice and submissions received during the Public Exhibition of the EIS and addressed each matter accordingly. Having regard to environmental and economic and social considerations, the carrying out of the Proposal remains justified for the following reasons:

- It is permissible with consent and is consistent with the objectives of the MU1 Mixed Use zone under the Strathfield LEP 2012;
- It meets the relevant statutory requirements of the relevant Environmental Planning Instruments including the Strathfield LEP 2012, with exception of the proposed exceedance to the FSR development standard due to the requirement for wintergardens which is justified and supported by a Clause 4.6 Variation;
- It will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- It is a direct response to the NSW Government's affordable housing policy and need for more dwellings that are well located, delivering 35 affordable units and 193 market units, which will contribute to local, State and national housing targets;
- It will provide a diverse supply of dwellings, ranging from one (1) bedroom to three (3) bedroom apartments to meet the housing and social needs of future residents;
- It provides a high-quality architectural and landscape design that offers a range of housing types, communal facilities, and gathering spaces that will contribute to a safe, secure and active environment;
- It provides a high standard of residential amenity for all residents within the Site that is consistent with the objectives of the Apartment Design Guide (ADG), as well as protecting the visual privacy, overshadowing, and solar amenity of surrounding residential properties; and
- It is suitable for the Site and in the public interest.

Given the merits described above, significant benefits associated with the Proposal and the refinements made in response to submissions received, it is requested that the SSDA be approved in an orderly manner.

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