



Internal Ref: EXTERNAL/2025/0015

8 September 2025

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

ATTENTION: Lucinda Craig

Dear Ms Craig,

Inner West Council Response: SSD-82714716 – WestConnex Dive Site Build-to-Rent (Annandale)

Thank you for the opportunity to review and comment on the proposal - WestConnex Dive Site Build-to-Rent (Annandale) State Significant Development Application (SSDA). These comments are provided by Inner West Council officers, not the elected representatives.

A separate submission regarding the concurrent rezoning application is also being made. Given the interrelatedness of these two applications, consideration should be given to the comments raised by Council in the rezoning proposal.

Council is acutely aware of the current housing emergency and the contribution this development could make toward addressing this. However, there are a number of matters which require further consideration including (but not limited to) the genuine affordable housing within the development, public domain design, Parramatta Road interface, the height of the development, and the servicing of the site.

The above matters and other matters for consideration are addressed in the following:

1. Site and strategic context

On 10 February 2025, the State government announced that new homes for rent would be at a subsidised rate for essential workers in Sydney, with the Minister for Planning and Public Spaces identifying the Dive Site as priority.

Acknowledging the State Government priorities currently are to increase housing supply due to the crisis in housing affordability, the Landcom proposal nevertheless is a significant departure from the PRCUTS vision. This vision was envisaged to support a biotechnology and biomedical hub, by leveraging the proximity to University of Sydney and Royal Prince Alfred Hospital, to generate high value jobs in specialised education and medical industries. As the pressure for new higher density residential development increases within the Camperdown employment precinct, greater attention is required to delivering affordable



housing, new jobs, and public infrastructure improvements, specifically on Government owned land. This site has the opportunity to genuinely contribute towards the health and education sectors and set a precedent by proposing a balanced mix of residential and commercial uses including biotechnology uses, collaboration spaces and key workers housing.

2. Affordable housing

The site provides a significant opportunity to provide genuine affordable housing contributions, in line with community expectations. As part of the SSD application, the proposal includes the Build-to-Rent (BTR) development proposed on Lot 1 (Stage 1A) with 220 units that are identified as 'essential worker housing.'

The proposal states the units will be provided at a rate of no more than 80% of the market rate for a period of 15 years. It is claimed that essential worker housing is becoming a more recognised form of affordable housing. The EIS report and supporting documentation however lack details about the implementation framework for ensuring the BTR units:

- will be provided at no more 80% of the market rate.
- will cater to essential workers only.

The efforts of NSW Government to provide BTR for essential workers in this unique location close to University and Hospital is commended. However, the mechanism to ensure that these BTR units would be reserved for essential workers only is unclear, as there is no formal legislative definition of essential worker in the NSW Planning System.

Development for the purpose of BTR is in Chapter 3 (Diverse housing) and not Chapter 2 (Affordable housing) of *State Environmental Planning Policy (Housing) 2021*. As such, further clarification is required on the mechanism that will ensure the proposed BTR units will be for 'essential workers' and will be 'affordable.'

In addition, considering the site is State-owned, commitment is sought from Landcom that the BTR units will be provided in perpetuity, instead of the minimum requirement of 15 years.

Further clarification is required from Landcom whether it would enter into an agreement with a Community Housing Provider (CHP) or equivalent to ensure that the rents are subsidised and only essential workers will be targeted for this site. It is recommended that any consent for SSD-82714716 (Stage 1A) includes conditions to ensure BTR units are provided in perpetuity and at no more 80% of the market rate for essential workers only.

3. Public Domain

It is positively noted that Bignell Lane public domain improvement works including the stormwater diversion and flood storage, are proposed to be developed under Stage 1 by Landcom. The following further comments are noted:

- a) Council strongly supports the State Design Review Panel (SDRP) advice to *'Removal of through-traffic from the lane will prioritise pedestrians and allow the retail and commercial tenancies to spill out and activate all edges of the public domain'*
- b) Public domain works adjacent to the site are to be designed in accordance with the Inner West Public Domain Design Guide, with input from Council's Public Domain Team.
- c) The existing overhead power cables adjacent to the site are to be relocated underground, and poles replaced with steel standards in line with Ausgrid's requirements. Street lighting is to be designed in accordance with Australian Standard AS1158 (Road Lighting) and Ausgrid's Network Standards.
- d) A public domain plan is to be submitted clearly identifying proposed publicly accessible areas. Council requests that a condition be included to create an easement or positive covenant to protect any public right of ways. Council can provide this condition upon request.

4. Bignell Lane

The proposal is based on consolidation of Landcom's existing lots and Bignell Lane into four lots, identified as Lot 1(Stage 1A,) Lot 4 (Stage 1B), Lot 2 (Stage 2), and Lot 3 (Stage 3). Bignell Lane is proposed to be realigned within Lot 4 (Stage 1B). The supporting reference scheme and landscape plan indicate works on the laneway to improve the amenity of a new central plaza area, rationalise the built form, and revitalise the laneway as a fine-grain, shared-zone.

Stage 1B would comprise the entire extent of Bignell Lane and the public domain areas along the lane. The proposed realignment and public domain improvements will be critical to the successful redevelopment of the site as a whole. At present, there are concerns about the information in EIS and supporting documentation for the SSD proposal in regard to the commitment and the delivery mechanism, including the set of works and scheduling that need to be agreed to by Council for the improvements to Bignell Lane.

Any consent for SSD-82714716 (Stage 1A and Stage 1B) should impose conditions to require the developer (Landcom) to enter into a planning agreement with Council for the realignment, access and public domain improvements for Bignell Lane.

Whilst it is positively noted that Bignell Lane is proposed to be developed under Stage 1, the inclusion of Bignall Lane results in an increased site area under the SSDA which has an impact on Floor Space Ratio (FSR) calculations and has been factored in. Concern is raised with the potential ability to include Bignell Lane as site area in future stages. As such, to prevent 'double dipping' of Bignell Lane, Stage 1A and 1B should be a consolidated lot, or a condition of the consent be included to require a covenant registered on Bignell Lane to create a 'restricted lot' which prevents the utilisation of Bignell Lane for site area or FSR in future developments.

5. Public Plaza

The proposed development has the opportunity to create significant positive public domain improvements in this location. Council commends the development of the landscaping of the Public Open Space as shown on the various perspectives and encourages further landscaping drawings, including perspectives to be provided of the Parramatta Road interface and associated entries.

The development is premised on public domain improvements that include creating a new public plaza on the northeast portion of Lot 1 (Stage 1A), fronting onto southern edge of the realigned Bignell Lane. The reference scheme and built form analysis indicate the new plaza is significantly impacted in part due to the irregular alignment of the BTR tower, the proposed height and massing on Lot 2 (to the north) and the extent of building envelope proposed on Lot 3.

Consistent with the advice provided by the State Design Review Panel (SDRP) on 7 May 2025, the BTR tower should be rotated perpendicular to Parramatta Road to improve the design for the public space. In addition, the building height and massing for Lot 2 should be reduced and the building envelope for Lot 3 drawn back from the western boundary.

The central plaza may still be impacted should development of a similar scale occur on the adjoining site to the north-east.

Further, while the public domain elements of this proposal and delivery of the primary plaza are supported as part of this application, there are still concerns regarding the delivery of the future stages and mechanism to ensure that the full vision of the public domain strategy of this site will be realised when the development on the remainder of the site is delivered by a third party. Commitments are sought from the Department and Landcom to deliver these public domain elements for the Inner West community through LEP controls and Planning Agreement.

Consideration to the following should be made to enhance the public spaces:

- Rotate the BTR tower perpendicular to Parramatta Road.
- Reduce building height and massing on Lot 2 and adjust building envelope on western boundary of Lot 3.
- Commitment be provided through the LEP and Planning Agreement as well as approval of the Public Domain and Landscaping strategy (subject to modifications) regarding the delivery of public plaza and through site links from Parramatta Road to Pyrmont Bridge Road through all stages (1/1B/2) of delivery on this site. The public domain elements are to be designed in line with Inner West's requirements and be made publicly accessible at all times for the Inner West community.

It is noted there is no letter of offer to enter an agreement with Council with respect to this proposal or with the concurrent rezoning application to address these public domain elements.

6. Parramatta Road Interface

Building alignment and setback

Parramatta Road is characterised by a well-established and consistent commercial street wall with a nil setback which encourages strong commercial activation and surveillance of the corridor. The following is noted with regard to the proposal:

- a) The proposal includes a deep recess, and a substantial height change from Parramatta Road which is inconsistent with the existing character. The design of the 7-storey podium element, incorporating the proposed setback, the angled alignment of the eastern wing as well as the staggering of the two angled elements (lobby to west and retail to east) does not result in a unified street wall along Parramatta Road.
- b) The portion of building that maintains a nil setback to Parramatta Road (in the southwestern corner) is not well activated at ground floor level. More than half of the ground floor interface incorporates doors to non-active spaces (access to bicycle parking, chamber substation and firebooster). Furthermore, the retail space is not directly accessed from the footpath.
- c) The proposal results in under-utilised spaces that are disconnected from the street and partially concealed behind planter beds and the buildings themselves. This results in a poor urban design and CPTED outcome, with little street activation or passive surveillance. It is noted that the Design Review summary states that the “skewed orientation of the barrier building creates a forecourt to the lobby and retail”, however the full potential for this forecourt has not been reached due to the location of ramps, paths and landscape beds.



Figure 1: Extract from perspective indicating how the building frontage at western end needs to be further activated and further consideration given to the forecourt to the lobby/primary entry.

- d) The proposed setback on the Parramatta Road frontage will improve the pedestrian experience due to the landscaping buffer, seating and tree planting. However, the combination of the landscaping beds, the difference in levels/ steps at two entry points and location of ramps, create a separation between the site and the street rather than providing a strong interface and connection. As such, the benefits of an increased setback have not been optimised and are at the expense of maintaining a unified street wall along Parramatta Road.

Consideration to the following should be made to enhance the Parramatta Road interface:

- Single angled setback (rather than two) be incorporated at the ground and first floor levels around the western entry. This will avoid creating blind corners and improve safety outcomes from CPTED perspective.
- The rhythm created by the vertical bays and articulation, as currently proposed on the facade of the western end of the Parramatta Road frontage, be continued to the front façade of the 7-storey podium building.
- Further rationalisation of the landscaping in the Parramatta Road setback area is required to have continuous deep soil zones and landscaping where possible while maintaining clear widths for footpaths, pavements, entries to the shops and foyers.



- Further, the front setbacks along Parramatta Road along with other public domain elements such as through site links and public plaza as part of this concept scheme is to be made publicly accessible via easement or right of way for public accessibility at all times.

Entries from Parramatta Road and through-site links

Key to enhancing the Parramatta Road experience is defining the entry points, providing visual links to the public open space and clear wayfinding. Please note:

- a) Council officers strongly agree with the comments of the SDRP in supporting the clear and thorough Connecting with Country framework for the masterplan and future development of the site, however, this can be more fully realised in refinement of the design. The proposal should further reflect the SDRP advice for the access points to increase visual permeability and physical connectivity. Council officers strongly support the SRDP advice that streets and lanes are to be open to the sky.
- b) The through-site links are not generous enough and do not present clearly in a visually inviting way from the Parramatta Road frontage as there are conflicting visual cues as to which entry is the primary entry to the site.
- c) The Diagram on Page 26 of Urban Design Report indicates that the primary entry is to the west. The adjacent spaces (foyer to tower and F&B premises adjacent to the Public Space) suggest this is case however the visual cues suggest otherwise. On elevation, the height of the opening (dictated by the linking bridge over) combined with the width and angled nature of the entry mean that this does not read as the main entry. There are stairs located to the southwest corner of the public open space. This does not allow for an equitable path of travel to the commercial premises and open space beyond.
- d) The eastern entry/ opening is more generous and appears to be the primary entry however is compromised by being a tunnel under the built form.
- e) There is opportunity to reinforce the green link through the site. It is noted that the Landscape report (Principles & Values - Embedding Country on Page 12) references connections and permeability, celebrating view lines and site corridors and the provision of a network of urban canopy through the site. However, landscaping links are not strongly reinforced through either entry. No tree planting is provided along either entry link.

Consideration to the following should be made to the definition of the entry points and providing enhanced visual links to the public open space from Parramatta Road:

- Provide a minimum double storey height opening for both through-site links (not just the eastern entry). It is noted that the SRDP advice suggested introducing an additional lift in the 7-storey podium which would mean that the first-floor bridge link to the tower would not be required. This allows the opportunity for an open to sky through-site link.
- Provide a minimum 9m wide open to sky through-site link for the western opening to reinforce this as the primary opening. This would allow for a better view corridor to the Public Space and would allow space for tree planting on one side of the pathway. An

equitable path of travel is to be provided for the primary entry, and it is suggested a ramp should be incorporated to the southwest corner of the Public open space to access the commercial premises beyond.

- Alternatively, emphasise the eastern N-S through site link between Parramatta Rd and Pyrmont Bridge Rd as the primary corridor. This could be achieved by providing a min. 9m wide through site link for the eastern entry corridor and allowing it to be “open to the sky” (as recommended for lanes by the SRDP). The commercial spaces to the west of the corridor would need to have a more active interface with the corridor.
- Incorporate further landscaping and tree planting through the primary entry. Consideration could be given to providing greenery to the wall of the bridge structure fronting Parramatta Road.

7. Building Height

It is recognised that the Parramatta Road is evolving; however, the proposed height of 21 storeys (76m) is out of scale with the existing and desired future character of this section of Parramatta Road, which is predominantly defined by street wall heights of 2–6 storeys and planning controls allowing up to 6–7 storeys. The proposed development will significantly change the character of this area and therefore should ensure it sets a good precedent from design perspective while balancing consideration for providing more housing.

It is recommended that further design studies be undertaken to ensure that building heights are an appropriate contextual response.

It is also unclear whether the proposal has been referred to Sydney Airport Authority, Civil Aviation Safety Authority and Sydney Local Health District regarding its proposed height controls. The site may be in close proximity or within the flight path of the emergency helicopters to Royal Prince Alfred (RPA) Hospital. Comments should be sought from these authorities to ensure that there will be no impact on the emergency operations of the hospital.

8. Subdivision Plan

The proposed subdivision plan results in a potentially undersized and constrained Lot 2 given its narrowness and likely overshadowing impacts on the public open space on Lot 1, and an oversized Lot 3 suggesting a large building envelope, also impacting the public open space on Lot 1.

In conjunction with Bignell Lane being closed to traffic in the middle, the lot boundaries should be readjusted to create a more centred public plaza area and through-site link, allowing for improved setbacks, separation, and transition between buildings and better interface with the public domain, with less impacts.

9. Solar Access and overshadowing

- a) The sun eye diagrams (DA402) indicate that when the proposed 16-storey building on Lot 2 to the north is developed, substantially less apartments will receive the required 2 hours of direct sunlight. Based on the sun eye diagrams it would appear that Units 1.06, 1.07, 2.07, 2.08, 2.09, 4.08, 4.09, 5.08, 5.09, 6.08, 6.09, 7.08, 7.09, 8.08, 8.09, 9.08, 9.09, 10.8 and 10.09 will not receive the required 2 hours of direct sunlight to both their private open spaces and primary living areas in accordance with the Apartment Design Guide. This results in only 137 or 63% of units receiving the required direct sunlight.
- b) The sun eye diagrams do not clearly demonstrate that the apartment configurations 2.02 and 2.04 (as repeated on the levels above) will receive 2 hours of sunlight to their private open spaces due to the partition walls to the north separating them from the adjoining neighbouring balconies. As such it appears that a further 21 units do not receive the required 2 hours of sunlight to their private open space and living room, resulting in 53% of units receiving the required direct sunlight.
- c) Consideration should also be given to the recently deemed HDA on the neighbouring site at No. 188-196 Parramatta Road to the west. Whilst no plans have been approved for this site yet, solar access modelling can be undertaken to establish appropriate setbacks should be established to ensure that the development can continue to meet the solar access requirements and not compromise the development potential of that lot, or other lots.

10. Deep Soil Zone

It is positively noted that there is no basement parking underneath the proposed central plaza. However, the proposal provides a non-compliant area of Deep Soil (being 242.7sqm). Under the requirements of the ADG, a minimum of 7% of the site area (being 363sqm) or preferably 15% (being 778.2sqm). This is a shortfall of 535.5sqm or 68%. Consideration should be given to increasing the overall area, and performance of the area. Further, areas less than 6m in dimension are not to be included in deep soil calculations in accordance with the ADG.

The primary intent of deep soil zones is to provide areas that allow for and support healthy plant and tree growth as well as promote management of water and air quality. Most of the area identified as 'deep soil zone' appears to consist of pervious pavers which is not considered to achieve the intent of facilitating and supporting health plant and tree growth. Of note Objective 3E-1, Figure 3E.4 outlines that paved areas should constitute no more than 10% of deep soil zones. It appears that approximately 70% of the deep soil zone is paved area.

Given the relatively unconstrained nature of the site, along with the benefits that deep soil zones offer, it is considered that the deep soil area should be increased to meet the ADG requirements.

11. Diversity of Employment Uses



The primary purpose of the MU1 zone is *to encourage a diversity of business, retail, office and light industrial land uses that generate employment opportunities*, particularly on the ground level.

The proposal includes 'retail' floor space at ground level, divided into relatively small tenancies. This approach is not considered to facilitate or encourage a diverse range of non-residential activities. A more diverse and flexible layout should be considered at the ground floor to accommodate a wider range of non-residential uses, in line with the intent of the zone. This could be achieved through larger tenancies and a more adaptable floor plate incorporating removable partitions.

12. Flooding and Stormwater Management

The following comments are provided regarding flooding and stormwater management:

- a) The proposed stormwater drainage upgrade and diversion (CE100 RevB), on which the flood modelling relies, does not appear feasible due to utility service clashes in Pymont Bridge Road. The proposed 750 × 750 box culvert will most likely need to connect into the existing pit in the footpath (behind pit A-6) that currently contains two 450 pipes. The existing stormwater drainage system in Pymont Bridge Road is to be fully investigated and services located (including potholing) to ensure any future stormwater diversion design is feasible. The flood modelling is to be amended to incorporate any changes to the stormwater design.
- b) Figure 10 of the Flood Impact and Risk Assessment (FIRA) indicates adverse impacts of between 0.1 and 0.3m in flood depth in Bignell Lane, adjacent to the north-eastern property not included in the development. Increases in flood depth is to be limited to 10mm, in line with industry standards.
- c) The FIRA does not clearly state how the floor levels along Pymont Bridge Road and Parramatta Road have been calculated, nor what freeboard was applied. To demonstrate compliance, please provide a table showing the 1% flood level at different locations, the freeboard applied, the flood planning level, and the floor level.
- d) Ensure compliance with Flood Controls in Section E1.3.1 of Part E Water of the Leichhardt DCP.
- e) Only 300mm of freeboard protection from flooding has been provided to the basement parking levels. A minimum of 500mm freeboard is required in low-hazard areas, and PMF protection is required in areas of high-hazard flooding.
- f) Works to Bignell Lane, including the stormwater diversion and flood storage, is to be delivered as part of the first stage of the development.
- g) Upon completion of the stormwater diversion works, all stormwater assets within the property will remain in private ownership and not become Council assets.
- h) Positive covenants and restrictions are to be placed on the land to ensure ongoing maintenance of the drainage and flood storage structures.
- i) An easement for overland flow is to be provided along the full length and width of the future "private" Bignell Lane.

13. Site Servicing

The following comments are provided regarding site servicing:

- a) The loading dock design relies on a turntable to allow service vehicles, including Council waste vehicles, to enter and exit in a forward direction. This is not considered appropriate, as turntables are prone to failure and would likely result in dangerous manoeuvres, including vehicles reversing into or out of the site. Given the size of the development, and the site being unconstrained, the proposal should be redesigned to allow vehicles to safely enter and exit the site without reliance on a turntable.
- b) The loading dock shall be designed to accommodate council's waste vehicle as follows:

• Dimension	• Measurement
• Length:	• 9.4 metres
• Width:	• 2.5 metres
• Height (travel):	• 4.5 metres
• Weight (loaded):	• 26 tonnes
• Turning Circle:	• 26 metres

14. Bicycle Access

It is positively noted that the bicycle parking facilities are proposed on the ground floor. Given the existing cycle way along Pyrmont Bridge Road, and its planned future expansion adjacent to the site, a more direct connection to this cycleway would be beneficial. In this regard, consideration should be given to providing direct access from the bicycle parking facility via Pyrmont Bridge Road, either in addition to or instead of the current access from Parramatta Road, which is less cycle friendly. Furthermore, any doorway width to the bicycle parking should be of generous width to ensure easy and convenient use.

15. Landscaping

It is noted that the proposal includes landscaping on levels 1, 2, 3, and 7 which Council commends and supports. Further details are required in the landscape plan including sections demonstrating that the proposed landscaping provides for suitable species, soil depth, water proofing, drainage etc. and are consistent with Inner West Councils Green Roof, Walls and Facades Technical Guidelines. A maintenance schedule is also recommended.

16. Apartment Mix

The proposal provides 8 x 3-bedroom apartments which is 3.6% of the apartment mix. It is acknowledged that the *Housing SEPP* provides for the flexible application ADG requirements including apartment mix for build-to-rent developments. However, it is strongly encouraged to include additional three-bedroom apartments, to ensure that tenants will be able to relocate to

other dwellings in the building as their housing requirements change, in accordance with Section 75(2)(b)(iii) of the *Housing SEPP*.

17. Common Circulation

Under the requirements of the ADG, the maximum number of apartments off a circulation core on a single level is eight and for buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.

The proposal includes one core which services 14 apartments on levels 1-6, and 10 apartments on levels 7-21. Further, for 220 apartments a building is recommended to have six lifts.

Council supports the SDRP recommendation to '*introduce an additional lift in the 7-storey podium building* ', in addition, there may be an opportunity to provide a staircase from the lobby to access level 1 which would provide an alternative to elevators for short trips.

18. Acoustic Privacy

The proposal includes a repeating living room window (apartment 8 (all levels)) adjacent to areas labelled 'PLANT ROOMS 1 INTAKE AC PLANT'. The interface of these apartments to the plant rooms needs to be further refined to ensure adequate acoustic privacy is provided whilst maintaining good internal amenity. In this regard, a fixed window with the suitable acoustic treatment could be annotated on the plans.

Further acoustic assessments will be required when approvals are sought for the commercial component, especially for developments that have the potential to impact on the residential component.

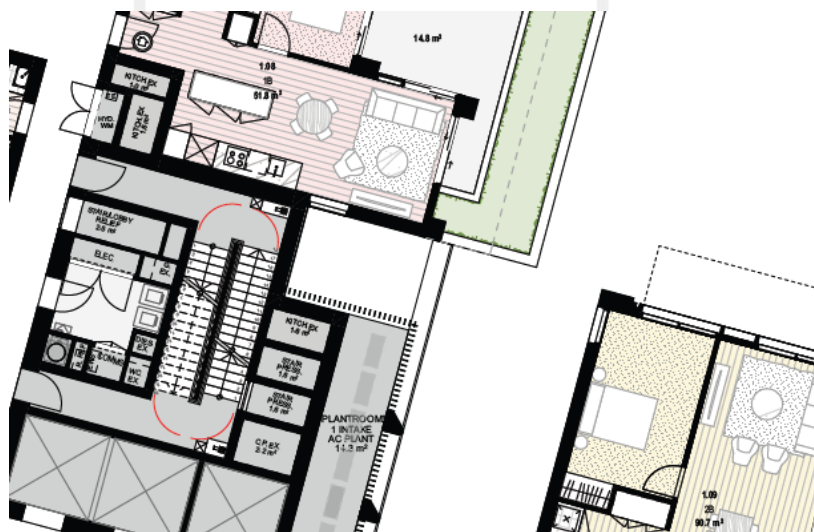


Figure 2: Apartment 1.08 windows near plant room. Repeats on all levels

19. Waste Management

While it is acknowledged that DCPs do not strictly apply to SSDAs in accordance with the *Planning Systems SEPP*, as Council is responsible for waste collection the following comments are provided:

- a) 1100L bins: The Waste Management Plan proposes garbage to be collected in 1100L bins. This is not a service option provided by Inner West Council. 1100L bins are significantly more expensive to procure than their 660L counterparts, have significant WHS concerns for building caretakers and collection crews, and break as quickly as 240L bins. The Waste Management Plan and Architectural Plans allow for 71 sqm for garbage storage which will be sufficient for 660L bins. An amended Waste Management Plan is required with all references to 1100L bins removed.
- b) Residential collection frequency: It is suggested in the Waste Management Plan that recycling is to be collected weekly. Please note that recycling collections are fortnightly at Inner West Council, and the DCP waste design requirements are based on this schedule. More frequent collections for recycling are not guaranteed. Waste facilities are to be designed based on Council collection frequencies and DCP requirements. If this is not done, Council reserves the right to refuse servicing, and the development will incur additional costs for excess/out of scope servicing for the life of the development.
- c) Commercial bin storage area: The Leichhardt DCP 2013, Part C, Section 2.4, C5 requires each commercial tenancy in a building or complex is to have a designated and clearly defined space within a communal commercial waste and recycling area. Please indicate how the commercial bin storage area is designed in line with this section of the Leichhardt DCP Part C, Section 2.4 and Appendix D (Section 7).
- d) Litter Prevention: It is recommended that litter bins be provided in publicly accessible spaces to minimise littering. The waste from these bins is not to be emptied by Council and is to be included by the property's commercial waste contractors.

20. Contamination

The proposed Remediation Action Plan (RAP) includes the excavation and removal of Underground Storage Tanks and associated infrastructure and any contaminated soil material. If suitable, onsite cap and containment of contaminated material and if any contaminated soils remain onsite, the implementation of a Long Term Environmental Management Plan (LTEMP). The consultant has advised that in addition to the RAP, an Asbestos Management Plan (AMP), a Remediation Environmental Management Plan (REMP) and a Work Health and Safety Management Plan (WHSP) be implemented to ensure the risks and impacts during the remediation works are controlled appropriately. Should a LTEMP be implemented for the development, this will need to be legally enforceable and publicly notified.

The consent authority will need to consider this when developing conditions in the event of approval. Public notification of the EMP should be required via either a notation on the planning certificate and/or registration on the land title. In relation to groundwater dewatering,



the consent authority should ensure that the necessary licenses in accordance with the *Water Management Act 2000* will be obtained.

21. Aircraft Noise

The proposed development is within the 20-25 Australian Noise Exposure Forecast (2039) Contour (ANEF). The consent authority is required to take into consideration the guidelines provided in Australian Standard AS2021 - 2000 - Acoustics - Aircraft noise intrusion - Building Siting and Construction (AS2021 - 2000) regarding noise reduction for residential purposes where the ANEF exceeds 20. Under the provisions of *IWLEP 2022*, The consent authority must be satisfied that the development will meet the interior noise levels specified in Australian Standard AS2021-2000.

Therefore, an acoustic assessment will need to be conducted demonstrating compliance with the relevant provisions of Australian Standard AS 2021:2000 Acoustics – Aircraft noise intrusion – Building siting and construction.

Further, as recommended above, the proposal should be referred to the Sydney Airport, CASA and RPA prior to establishing the height controls on the site.

22. Electric Vehicle Facilities

Consistent with Council's Our Fairer Future Plan, it is recommended to consider the provision car parking spaces to be Electric Vehicle (EV) ready to use (including cabling, power outlet or charging head) to at least 20% of the spaces provided.

23. Section 7.11 Contributions

Under section 7.13(2) of the *Environmental Planning and Assessment Act 1979*, the consent authority must have regard to relevant contributions plan. The Inner West Local Infrastructure Contribution Plan 2023 is the relevant contribution policy applying to the subject land, and in accordance with its section 2.1 Determining the contribution type, the proposed development would attract a section 7.11 contribution as it intensifies the uses and density on the subject site. The below citation is quoted from a recently approved SDD-68067459 issued by the Department, dated 20 December 2024 (see page 7, Condition A9), Council requests that this condition is replicated if approving this application:

Prior to the issue of the first Construction Certificate, the Applicant must provide written evidence to the Certifier that a monetary contribution pursuant to the provisions of Council's Section 7.11 Development Contribution Plan – Inner West Local Infrastructure Contribution Plan 2023, has been paid to Council. Council must be contacted for calculation of required contributions.



Conclusion

Council would like to thank you for the opportunity to provide further comment as the subject site is prominent and important. Council is supportive of its orderly and economic development. As mentioned earlier, the Inner West Council and community is acutely aware of the housing emergency. This proposal represents a significant contribution to a solution for the Inner West community provided the issues identified above are resolved.

Given the importance of the site, Council would like to work collaboratively and offer its knowledge of the area and internal expertise towards achieving a high-quality outcome for the site. Council seeks the Department's support to negotiate a Planning Agreement for this site with the proponent in order to ensure that the infrastructure upgrades associated with the provision of publicly accessible through-site links and public plaza as well as affordable housing will be delivered on this site in-perpetuity for the Inner West community.

If you need any further information in relation to the above response, please contact Council's Senior Planner Annalise Ifield at 02 9392 5127 or email annalise.ifield@innerwest.nsw.gov.au, or Team Leader, Development Assessment, Tom Irons on (02) 9392 5300 or email tom.iron@innerwest.nsw.gov.au.

Yours faithfully,

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

Simone Plummer
Director Planning