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1 December 2025

Edwina Ross  
Department of Planning, Housing and Infrastructure  
Phone 02 9274 6120  
[edwina.ross@dpie.nsw.gov.au](mailto:edwina.ross@dpie.nsw.gov.au)

Dear Edwina,

**Response to amended/additional material - State Significant Development (SSD-80432461) – Infill Affordable Housing at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield**

Thank you for the opportunity to provide further comment on the amended material recently submitted in relation to the proposed SSD – for infill affordable housing development at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield. Council staff have reviewed the proposal and prepared a submission which is attached below.

Please contact Louise Gibson – Senior Planner on 9748 9999 or [louise.gibson@strathfield.nsw.gov.au](mailto:louise.gibson@strathfield.nsw.gov.au) for any further correspondence or to clarify issues raised in Council's submission.

Regards,

A handwritten signature in black ink, appearing to read "Rita Vella".

Rita Vella  
Manager, Planning & Place

## **Strathfield Council Response to amended/additional material to State Significant Development (SSD-80432461) – Infill Affordable Housing Development**

Strathfield Council appreciates the opportunity to provide further comment on the SSD – Infill Affordable Housing Development.

Council has reviewed the revised documentation submitted for consideration by the Department of Planning, Housing and Infrastructure. While the additional material has addressed several of Council's previous concerns, the following matters remain outstanding:

### **Urban Design**

The proposal reflects some consideration of Council's earlier feedback; however, further amendments and clarification are required:

#### Plenums for Cross Ventilation

The inclusion of plenums for cross ventilation in corner units is illogical. These units are already considered cross-ventilated under the Apartment Design Guide (ADG), making the provision of plenums unnecessary.

#### Combining Internal Corner Units

Previous referral advice recommending the combination of internal corner units on Levels 1–3 to avoid the need for plenums has not been addressed.

Council does not support cross-ventilation via plenums. Council's suggested approach would be to convert the affected apartments into two-storey, 3+ bedroom units to achieve:

- a. Cross-ventilation (single-aspect two-storey units are considered cross-ventilated under the ADG)
- b. Increased proportion of 3-bedroom units. The current 7% provision falls short of the ADG minimum of 10%, the Homebush TOD mandate of 20%, and Strathfield Council's own strategic targets.

### **Environmental health**

#### Site Investigation (Contamination)

While the Additional Site Investigation (ASI) has addressed some of the previously raised matters, particularly in relation to further characterisation of shallow fill material and updated waste classification, there remain several contamination risks and uncertainties that have not been fully resolved. These matters need to be addressed before the site can be confirmed as suitable for the proposed sensitive use.

The site directly adjoins an operating service station with active underground petroleum storage systems (UPSSs). UPSSs are a recognised potential source of petroleum hydrocarbon impacts.

No soil vapour monitoring or assessment of hazardous ground gases has been undertaken. Given the presence of a UPSS immediately adjoining the site and the proposed basement construction, vapour migration remains a credible exposure pathway and should be investigated.

Access to the adjoining service station property was not obtained, and no intrusive investigations were undertaken close to the UPSS infrastructure. As a result, the highest-risk source area has not been investigated. Best practice under the NEPM and EPA guidance is that where direct access is unavailable, investigations should be conducted as close as possible to the shared boundary to assess the potential for off-site impacts.

In relation to soil impacts, the ASI confirms lead concentrations up to 2,800 mg/kg in shallow fill at BH102. This exceeds the relevant NEPM Health Investigation Level for residential use and the NSW EPA Waste Classification Guidelines thresholds.

While the ASI states that this material will be removed during bulk excavation, a Remedial Action Plan (RAP) has not yet been provided and therefore there is no documented methodology for excavation, spoil classification, disposal, validation sampling or contingency protocols.

Taking the above into account, it has not yet been demonstrated that the site is suitable for the proposed development in its current condition.

However, the information available indicates that the site may be made suitable, provided the identified data gaps and risks are addressed through further investigation, remediation and validation in accordance with the NEPM and NSW EPA guidance.

Given the complexity of the contamination issues, evidence of hydrocarbon odour at depth, the proximity of a high-risk external source (UPSS), and the absence of vapour assessment and intrusive investigation near the UPSS boundary, it would be prudent to require the appointment of a NSW EPA-accredited Site Auditor. A Site Audit Statement would provide an independent determination of whether the site is suitable for the proposed use and confirm that investigation, remediation and validation have been completed in accordance with the NEPM and EPA requirements.

### Groundwater

Although groundwater was not encountered during the original Preliminary Site Investigation (PSI), the later ASI indicates that groundwater was encountered and sampled in monitoring wells, with petroleum hydrocarbons reported below laboratory limits of reporting. While this is a positive finding, the current investigations do not establish whether the groundwater monitoring wells were positioned suitably to assess the potential migration pathway from the UPSS.

The ASI also states that “hydrocarbon odour was noted during drilling in shale bedrock at 10 m BGL at BH204M,” and that “this odorous material was not sampled”. The presence of odour without laboratory analysis introduces remaining uncertainty regarding subsurface conditions.

The site comprises a total area of 3,361m<sup>2</sup>. The bulk excavation is to depths of approximately 14 metres below ground level. 4 boreholes and 2 groundwater monitoring bores targeting the boundary with adjoining service station.

Completion of one groundwater monitoring event – with measurement of standing water levels and representative sample collection at each of the 2 wells.

## **Waste Management**

The architectural plans must label the bin room and chute system provided across each floor level of the building. Bin presentation areas should be clearly designated (i.e. painted designated areas) and must be kept clean and tidy at all times.

As FOGO building guidelines are still in development, waste management plans are subject to change in line with NSW best practice guidelines. The development must be prepared for these changes as this will change the composition of each floor's bin room.

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.

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.

The building manager is responsible for moving bulky waste to the waste loading area from the bulky waste room for Council collection.

Additional area could be allocated for future recycling initiatives – i.e., in building textile recycling bins or in-house compost areas.

Concern is raised 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.

## **Development Engineering**

Council's initial comments requested assessment of the final 2 metres of excavation depth within the Geotechnical Report. This analysis remains outstanding and is critical given the proximity of railway lines, embankments, and the adjacent service station.

## **Trees**

Council reiterates its previous advice regarding the retention and protection of Tree 2 (*Tristaniopsis laurina*) located on Pilgrim Avenue (SRZ 2.76m, TPZ 6.4m). The tree is in good health, provides significant canopy coverage, and does not overhang the development boundary. Current architectural/landscape drawings propose removal of Tree 2 to accommodate on-street parking.

Council strongly recommends integrating parking while retaining the tree, similar to examples such as Watsons Street, Neutral Bay, where raised permeable pavement parking spaces have been successfully incorporated with existing street trees.

## **Conclusion**

Council thanks the Department and the proponent for the opportunity to provide additional feedback on the SSD. As outlined above, Council's remaining concerns relate to matters of urban design quality and landscape treatment, waste management and preliminary investigation matters.