

17 December 2025

Tuong Vi Doan
Department of Planning, Housing and Infrastructure

Dear Vi

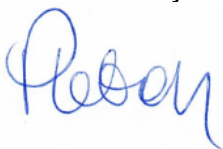
Re: Canterbury Bankstown City Council Submission to the State Significant Development Application, SSD-49937206 - Abel Tasman Village Seniors Housing

Thank you for the opportunity to provide a submission in response to the exhibition of the State Significant Development (SSD) Application SSD-49937206 at 222 Waldron Road, Chester Hill. Council has reviewed the documentation made available on the Department of Planning, Housing and Infrastructure (the Department) website and enclosed with this letter is Council's response to the SSD Application.

Based on our review of the application, Council generally supports the proposed development. Council's feedback and comments are summarised in Attachment A with detailed comments provided at Attachment B.

If you require any clarification or have any enquiries regarding this submission, please feel free to contact me on 02 9707 5593 or Patrick.Lebon@cbc.city.nsw.gov.au.

Yours sincerely



Patrick Lebon
Coordinator Strategic Assessments
Canterbury Bankstown Council

Attachments:

- A - Summary of Additional Information, Amendments and Recommended Conditions of Consent Requested by Council
- B – Detailed Comments

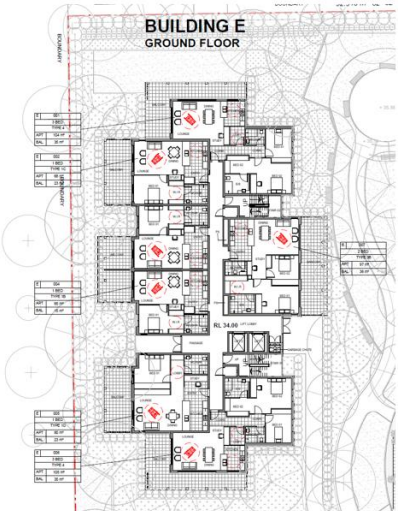
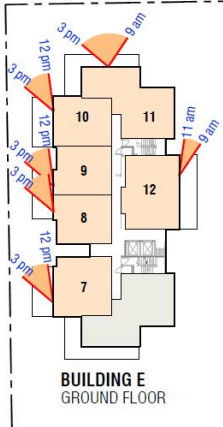


Attachment A - Summary of Additional Information, Amendments and Recommended Conditions of Consent Requested by Council

Category	Additional information requested	Recommended design and/or plan changes	Recommended conditions of consent and/or staging
Town planning – Development Assessment	- Floor space ratio clarification - Site amalgamation	- Apartment solar access - Apartment cross ventilation compliance	
Development engineering services		- Stormwater design - Vehicle access and car parking design	
Resource recovery (Waste)		- Bin room doors - Loading bay - Holding of bins	
Traffic engineers			- Vehicle access, kerb and gutter replacement - Pedestrian island and kerb ramps construction
3D Model (digital)	Digital 3D model		
Urban Design	Car park uses between commercial and residential units	- Bulk, massing and modulation - Architectural expression and materiality - Retail tenancy redesign	
Affordable housing - Payment of Section 7.11 or 7.12 Development Contributions	Clarification of applicability required		
Payment of Section 7.11 or 7.12 Development Contributions			Payment of Development Contributions
Payment of fee – Post Consent Compliance	Applicant to note this fee requirement post-consent		



Attachment B - Detailed Comments

Category	Council Feedback
Town planning – Development Assessment	Additional information and revised development plans are requested to address the following issues: <u>Proposed Floor Space Ratio</u> - Concern is raised over how the staging of the development will ensure the maximum FSR development standard is not breached. - The proposal includes construction of Building B in stages, and the retention of existing buildings (identified as 1-8 and 15, 16-1 and 17). - The plans do not appear to give any details of the existing gross floor area of these buildings (in brackets) and the impact of staged construction of new buildings amidst the retention of existing buildings, and whether the FSR standard will remain compliant. <u>Solar access to proposed apartments</u> - The solar access diagrams raise questions as to whether appropriate solar access is provided to units, especially those oriented directly east-west. The provision of screens, or the projection of large sections of building beyond the east and/or west elevations of the new buildings, calls into question whether actual solar access will be achieved to these units at the required times (9am-3pm 21 June). - The unit marked as 8 in the image on the right cannot achieve the claimed solar access, as the fire wall between the balconies/open space of units “8” and “9” must be impenetrable to fire and, therefore, sunlight. - If this situation is replicated multiple times across multiple buildings, it is likely that the solar access compliance will reduce significantly and may fail to achieve the required 70% of units.  



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	<u>Site amalgamation</u> • Council seeks clarification if the long-term intention is to amalgamate/consolidate the sites. • The plans show part of Building B on the E1 Local Centre Zoned land – is this just illustrative due to the significant FSR and height implications for each lot? The basement and Building B will straddle the existing boundary, creating significant fire-separation implications that will need to be physically addressed in the construction if the sites are not consolidated. <u>Apartment cross ventilation compliance</u> • Council doubts the cross-ventilated claims of a number of the units e.g. Ground Floor Building E. In the images below the units marked as 7, 8, 9 and 10 (in the image on the right) are unlikely to achieve the required pressure differential given the location of windows are not likely to create a genuine “dual aspect” unit. • The removal of as many as four units per floor from the cross-ventilation calculation would see the percentage drop well below the required 60% of units.
Development engineering services	The following points need to be addressed in revised plans submitted before a determination is issued: <u>Stormwater design</u> • Orifice steel plate will need to be 5mm in thickness according to Development Engineering standard Guide, clause 7.14, Orifice plates and choke pipes.



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	- Hydracor stormwater management site plan sheet 2 of 6 shows a 450 RCP to connect with existing lintel but ADP stormwater plan – ground floor shows pipe connected to a proposed lintel. - A drainage easement will be required for properties along northern boundary of site (11 to 1 Banool Street) to Waldron road. Should these properties develop, draining stormwater to Banool Street kerb will pose a serious issue and runoff may flood new site. - Council will require inlet and outlet invert levels of both RWT to identify adequate from RWT to OSD. - Council will require inlet, outlet invert levels and surface levels of proposed pits, in particular pits servicing building C, which show water travelling against existing grade into OSD 2. - Applicant will need to confirm the stormwater construction process for building C in association with OSD 2. Will the pipes building C and connecting to OSD 2 be built in stage 1, if not will applicant puncture OSD 2 to service building C during stage 2 construction? <u>Vehicle access and car parking design</u> - The Transport and accessibility impact assessment for proposed senior housing development states, clause 5.3 states the maximum length of vehicles including, minibus and garbage truck will be up to 8 metres. Please confirm, that a private/alternative waste vehicles will be collecting the weekly rubbish from the proposed site, instead of councils 12.5m waste vehicles. - The Transport and accessibility impact assessment for proposed senior housing development, B99 and B85 swept path indicates manoeuvrability within Building A clash at corners and at the intersection. - Applicant to confirm if the retail parking bays are for staff or customers. If it is customers a minimum 2.5m width is required, in accordance with AS2890.1;2004, table 2.2 layouts for parking spaces. - Disabled shared areas require bollards in accordance with AS2890.6;2009.
Resource recovery (Waste)	<u>Bin room doors</u> All bin room doors intended for servicing must be at least 2 meters wide to allow safe and efficient movement of bins. Doors should open outwards toward the corridor or external area. <u>Loading bay</u> Waste collection areas must include clearly marked collection points for waste vehicles. These points should be designed to accommodate an SRV (Small Rigid Vehicle) or larger, in accordance with AS2890.2 standards. <u>Holding of bins</u> Each floor and kitchen area must provide a designated holding space for bins before they are moved to the main collection point. This intermediate space allows cleaners to stage bins temporarily, avoiding clutter in corridors and



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	ensuring smooth operations. From these holding areas, bins will be transferred to the collection point and emptied into skip bins.
Traffic engineers	<u>Trip generation</u> • The proposed increase in accommodation comprises an additional 145 beds/units. The PM peak hour trip generation rate for senior housing, as outlined in the Guide to Transport Impact Assessment, is 0.17 trips per dwelling. Although the current guide does not specify a rate for nursing homes, the previous version recommends a rate between 0.1 and 0.2 trips per bed for aged-care facilities. • The Applicant has applied a rate of 0.18 trips per unit/bed, which is considered reasonable and within accepted industry parameters. • Using this rate, the anticipated increase in traffic generation is approximately 25 trips per hour (145×0.18). This level of additional traffic is insignificant when dispersed across the surrounding road network, including Chester Hill Road, Waldron Road, Miller Road and Campbell Hill Road, all of which currently accommodate between 900 and 2,250 vehicles per hour. • Accordingly, the trip generation assessment is considered satisfactory. <u>Access arrangements</u> • The site currently contains two vehicular access points on Waldron Road and two on Campbell Hill Road. • The proposal seeks to retain the two driveways on Waldron Road and close the two existing driveways on Campbell Hill Road. This arrangement is considered acceptable. • However, the existing vehicular crossing on Waldron Road located closest to the roundabout (at the south-eastern corner of the site) must be fully reinstated to standard kerb and gutter at the Applicant's cost. Similarly, both vehicular crossings on Campbell Hill Road that are proposed to be closed must also be reinstated with kerb and gutter at the Applicant's cost. • Council requests the Department includes a condition on any development consent issued to require these works to be completed and funded completely by the applicant to Council's specifications. <u>Proposed parking</u> • The total parking requirement is 126 spaces. 136 parking spaces (including 42 spaces in the future Building C car park which will be subject to a future application) are proposed which satisfies the provisions of the SEPP and DCP. Provision for an ambulance is included at the front of the facility. • This is acceptable. <u>Existing roundabout at the Waldron Road and Campbell Hill Road intersection</u> • For the benefit of local residents and to improve pedestrian safety, it is recommended that the Applicant reconstruct the western splitter island on Waldron Road to provide a minimum 3.0-metre-wide pedestrian refuge, consistent with current standards. • The existing island width of approximately 2.5 metres is below the required standard and does not adequately accommodate pedestrians. At the same



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	time the kerb ramps associated with this crossing will also need reconstruction to match the gap within the island. • While there is currently no pedestrian gap within the raised island on the northern approach—likely due to vehicle turning path constraints, it is recommended that the Applicant reconstruct the kerb ramps on this northern side of the roundabout to facilitate safer pedestrian crossing of Campbell Hill Road. • Council requests the Department includes a condition on any development consent issued to require these works to be completed and funded completely by the applicant to Council's specifications. <u>Heavy vehicle movement during construction</u> Although there are no schools in the close vicinity, the Applicant must not use public roads during school zone times. Council requests the Department includes a condition to address this matter. <u>Nearest bus stops</u> The nearest bus stop to the site on Waldron Road is located approximately 275 metres from the proposed pedestrian access. The Applicant is encouraged to consider providing an additional pedestrian access from Campbell Hill Road to improve connectivity for residents to the bus stop located approximately 160 metres to the north on Campbell Hill Road.
3D Model (digital)	The applicant is to provide a 3D model for assessment and community engagement, in line with Council's 3D Model Submission Manual. https://cb.city/3D-Model-Submission-Manual
Urban Design	Council generally supports the design intent of the proposed development and its ambition to deliver mixed use and age care facilities in this local community. However, the proposal exceeds Council's maximum height control whilst also creating buildings that are visually bulk, and transition poorly into the surrounding residential areas at a much lower scale. In addition, the active frontage along Waldron Road appears to be an after thought with retail spaces that are highly constrained in the type of businesses it can accommodate which will not positively contribute towards the commercial vibrancy of Waldron Road. The following matters need to be addressed by the applicant through revised development drawings: <u>Bulk, massing and modulation</u> • The proposal has shown building A to be at a consistent height which does not allow for a transition into the adjoining residential lot to the north which are zoned for significantly lower height. The proponent should revise the northern portion of the building with a two to three storey upper level setback to create a gradual transition into the adjoining residential areas. • The proposal has shown building C to be significantly above the maximum height limit which becomes oppressive for the Waldron Road and Abbot Park. The proponent should revise the building design to be below the maximum



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	height and create an active interface with the public domain to improve its visual and spatial amenity. - The proposed ground floor of building A is sitting quite high in relation to Campbell Hill Road which creates a poor interface with the public domain by creating excessive blank walls and the need for ramp access. The proponent should reduce the overall building height, including basement, so that the ground floor of building A can sit relatively close to the natural ground level along Campbell Hill Road. This would improve the overall building interface and allow for better opportunities to connect the ground floor units with Campbell Hill Road such as private entries from the street. <u>Architectural expression and materiality</u> The proposed buildings are visually bulky with similarly coloured material used throughout its balcony. The proponent should revise the materials of the balcony to be lighter and more contrasting with each other to reduce its visual impact. <u>Siting and circulation</u> - The proposal does not denote the different carpark uses cases between the commercial and residential units. The proponent should provide information on the commercial and residential car parks and ensure they are separated to minimise conflict between the different user groups. - The proposed retail units along Waldron Road are all quite small, with no storage area areas. This will greatly limit the type of businesses feasible, particularly businesses that can create gathering spaces such as restaurants and cafes. The proponent should revise the retail shop into larger and deeper units to increase the flexibility to accommodate different types of businesses.
Affordable housing - Payment of Section 7.11 or 7.12 Development Contributions	Section 3.1.6 of the Environmental Impact Statement (EIS) refers to the Council's Affordable Housing Strategy and the proposed development providing 'concessional places'. Section 1.3 (p14) of the Canterbury Bankstown Local Infrastructure Contributions Plan 2022 notes that the following development is excluded from the Plan: <i>Affordable housing carried out by or on behalf of a registered social housing provider, provided that:</i> <i>– the affordable housing is managed by a registered social housing provider;</i> <i>– the total residential gross floor area exempted is used solely for the purpose of the provision of affordable housing in perpetuity; and</i> <i>– a covenant is registered in the title of the site prior to the issuance of the Occupation Certificate, with wording shown in the box below.</i> Council seeks written confirmation from the applicant whether the SSD application would be excluded from the payment of Section 7.11/12 Development Contributions in accordance with the above.
Payment of Section 7.11 or 7.12	Development Contributions must be paid for this development before the issue of any construction certificate. The contributions are levied and applied under the Canterbury Bankstown Local Infrastructure Contributions Plan 2022 and Section 7.11 or 7.12 of the Environmental Planning and Assessment Act 1979. The



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Development Contributions	contributions will be used to provide, extend or augment public amenities or public services. In the event of a development consent being issued by the Department of Planning, Housing and Infrastructure, Council requests a condition of consent is imposed that requires the applicant to pay the required contributions to Council prior to the issue of a Construction Certificate. No construction certificate is to be issued and no construction is to commence until payment of development contributions. The contribution must be paid to Council before the issue of any Construction Certificate. Construction of the development may NOT commence until the development contributions are paid. Note, where a development includes residential accommodation that will result in a net increase in residents on the land a section 7.11 contribution will apply. If the proposal includes residential accommodation which does not increase the number of residents but has a cost greater than \$150,000 a Section 7.12 levy will be imposed. If both forms of residential development are proposed on the site, the contribution type that produces the higher amount of contributions will be applied. Refer to Section 01 (pages 13-17) of the Canterbury- Bankstown Local Infrastructure Contributions Plan 2022 for details on calculating contributions. Indexing of the contribution amount to be paid: The development contribution payable will be adjusted, at the time of payment, to reflect Consumer Price Index increases which have occurred since the "Consent to operate from date" which appears on the front page of this Determination Notice. Applicants should contact Council's Customer Service team on (02) 9707 9000 or council@cbc.city.nsw.gov.au to be advised of the current contribution payable and how to pay.
Payment of fee – Post Consent Compliance	If this SSD is approved, there may be conditions of the consent that may require Council's review and/or approval of documents before the construction and/or occupation of the development can occur. In accordance with Council's adopted Fees and Charges, a fee of \$1,375.00 (excl. GST) is required to be paid by the applicant to Canterbury Bankstown Council prior to submitting any information to Council as required by the SSD development consent conditions.