

4 February 2026

Ms Caitlin Hopper
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street,
PARRAMATTA, NSW, 2150

Dear Ms Hopper,

**Cover Letter to Submission - State Significant Development (SSD-81767963)
Mixed Use Development 17-24 Loftus Crescent Homebush (SSD2025.2009)**

Thank you for the opportunity to provide comments on the proposed SSD for construction of a mixed-use development located at 17-24 Loftus Crescent, Homebush comprising ground-floor retail and 318 dwellings (including 12 affordable housing dwellings – 3%) in towers extending 27 and 35 storeys. Council staff have reviewed the proposal and prepared a submission which is attached below.

Council recognises the importance of providing additional housing to meet the needs of a growing population. However, the delivery of housing cannot, and must not, come at the expense of essential community infrastructure required to support that population into the future. As the first development proposed within this precinct, it is particularly critical that this project sets a high benchmark for subsequent development. This includes achieving design excellence, as well as the provision of meaningful community facilities, public spaces, and urban improvements that ensure the precinct develops in a cohesive, liveable, and sustainable manner for current and future residents.

Strathfield Council officers remain unsupportive of the proposal in its current form. The application fails to demonstrate any clear or meaningful community benefits that could justify the substantial increases in building height and floor space ratio being sought. The proposal appears to rely solely on the provision of additional housing as its justification, without offering tangible enhancements to the urban environment, streetscape, or local amenity.

The lack of broader community or public benefit raises significant concerns regarding the project's impact on quality of life, neighbourhood character, and the long-term interests of the local community. In its current form, the proposal does not provide a sufficient basis to support the substantial departures from planning standards it seeks, and proceeding with approval would set a concerning precedent that prioritises development scale over genuine community and environmental outcomes.

The proposal appears to rely inappropriately on development parameters and precedents established under the Homebush TOD Key Site 11 Incentive Provisions. Those provisions allow for increased Height of Building and Floor Space Ratio only in exchange for the delivery of

substantial public benefits, including through-site links, expanded and embellished public open space (2,489m²), and meaningful improvements to the public domain.

None of these essential public benefit measures are included in the current proposal. By contrast, this development seeks significant increases in scale without providing the corresponding community or urban improvements that underpin the Key Site 11 incentives, rendering the claimed precedent both inapplicable and insufficient justification for the departures being sought.

Before support can be provided for the project, Strathfield Council is seeking resolution of the following key issues:

- A commitment to working with Strathfield Municipal Council to deliver tangible community benefits that might justify substantial increases in building height—from 75 m to 93 m and 119 m—and a floor space ratio rise from 3.6:1 to 7.81:1. In reality, the development constitutes a clear overdevelopment of the site and fails to provide any meaningful or measurable public benefit to support such extreme departures from planning controls. Without demonstrable contributions to community infrastructure, public amenity, or the urban environment, the justification for these increases is wholly inadequate. Approval of the proposal in its current form would set a dangerous precedent, prioritising development scale over community needs, precinct character, and long-term liveability, undermining the integrity of strategic planning for the area.
- Urban design response that integrates the design and appearance of the project with surrounding urban areas. This is particularly important noting the future urban community with the Homebush TOD Precinct and the Key Site Provisions that facilitate provision of community infrastructure on nearby sites that are not apparent within this proposal. Nearby sites within the Homebush TOD, that benefit from Key Site Provisions providing Incentive FSR and Incentive Height of Building, deliver significant areas of embellished and enhanced open space, through site links and public domain with the highest maximum Incentive FSR being 5:1, much less that the 7.81:1 being sought.
- Adjustments to building setbacks, lot boundaries, and potential land dedications along Loftus Lane, Subway Lane, and Loftus Crescent to achieve the minimum road reserve requirements necessary for the Yield Street and Neighbourhood Street typologies, as defined in the Homebush TOD Precinct Design Guide.
- Resolution of technical items as detailed in the attached submission.

In addition, Council officers raise serious concern regarding the timing of the public exhibition period, which was scheduled from 18 December 2025 to 4 February 2026 and occurred almost entirely over the Christmas and New Year shutdown period.

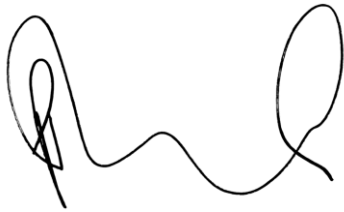
This timeframe is fundamentally inappropriate given the scale, complexity, and strategic importance of the proposed SSD and concurrent rezoning. This period is one in which a significant proportion of the community, Council staff, professional consultants, and key stakeholders are on leave, materially constraining the ability to meaningfully review extensive and highly technical documentation and prepare informed submissions. In recognition of these constraints, Council formally requested an extension to the exhibition period on 5 January 2026. The DPHI advised on 12 January 2026 that it would not grant an extension.

Council officers are of the opinion that proceeding with exhibition under these circumstances seriously compromises opportunities for genuine, informed public participation and fundamentally undermines procedural fairness.

Please note that these comments are officer comments only. The submission will be presented to Council for endorsement which may result in additional feedback or comment.

Please contact Greg Dyson – Executive Planner, Strategic Planning on 9748 9999 or greg.dyson@strathfield.nsw.gov.au for any further correspondence or to discuss Council's input.

Regards,

A handwritten signature in black ink, appearing to read 'Paul Reid', with a stylized, cursive script.

Paul Reid
Director, Planning & Environment

Strathfield Council Draft Submission to State Significant Development (SSD-81767963) Mixed Use Development 17-24 Loftus Crescent Homebush (SSD2025.2009) – 4 February 2026

Strathfield welcomes the opportunity to provide comments on the application for SSD – Mixed Use Development 17-24 Loftus Crescent, Homebush. It is understood that the proposed SSD seeks approval for:

- Demolition of existing structures, tree removal and site excavation for a new 2 storey basement.
- Construction of a new mixed-use development consisting of:
 - Ground floor retail premises consisting of 1,193 m² of Gross Floor Area (GFA).
 - Two residential towers, ranging from 27-35 storeys and comprising a total of 318 apartments including:
 - 306 market apartments;
 - 12 affordable apartments;
 - Residential lobbies and a podium; and
 - Communal open space.
 - Car and bicycle parking for residents, workers and visitors across two (2) basement levels and Levels 1 to 3 including:
 - 352 car parking spaces, inclusive of 48 accessible spaces;
 - Garbage storage;
 - Plant rooms and other associated services; and
 - Public domain upgrades to Loftus Lane, including road widening and the provision of a site through link from Loftus Crescent through to Loftus Lane.
 - Associated landscaping and public domain works.
 - Extension and augmentation of services and infrastructure as required.

The concurrent rezoning seeks the following amendments to the *Strathfield Local Environmental Plan 2012* (SLEP 2012) to facilitate the proposed development:

- Amend the Height of Buildings Map under SLEP 2012 clause 4.3 to increase the building height from 75m to 93m and 119m; and
- Amend the Maximum Floor Space Ratio (FSR) from 3.6:1 to 7.81:1.
NB: Existing controls allow building 8-13 storeys and GFA of approx. 14,331m² – proposal sits at 31,083m²

A summary of Key Project Information follows:

COMPONENT	DESCRIPTION
Proposed Land Use	<ul style="list-style-type: none"> • MU1 – Mixed Use
Legal Description	<ul style="list-style-type: none"> • Lots 14-20 DP 9154 and Lot A DP 405742
Site Area	<ul style="list-style-type: none"> • 3,980m²
Unit Mix (Market)	<ul style="list-style-type: none"> • 1 Bed x 87 • 2 Bed x 154 • 3 Bed x 60 • 4 Bed (Penthouse) x 5 <p>TOTAL 306</p>
Unit Mix (Affordable)	<ul style="list-style-type: none"> • 1 Bed x 4 • 2 Bed x 6 • 3 Bed x 2 <p>TOTAL 12</p>
Gross Floor Area (GFA)	<ul style="list-style-type: none"> • 31,083m² TOTAL • 29,860m² (Residential) • 1,193m² (Non-residential)
Maximum FSR	<ul style="list-style-type: none"> • 7.81:1 TOTAL • 7.51:1 (Residential) • 0.30:1 (Non-residential)
Maximum Height of Building	<ul style="list-style-type: none"> • 93m (27 storeys) western tower • 119m (35 storeys) eastern tower
Boundary Setbacks	
Loftus Crescent	<ul style="list-style-type: none"> • Ground level to Loftus Crescent: 0.8m • Podium to Loftus Crescent: 0m • Levels 5-34 to Loftus Crescent: 3m
Loftus Lane	<ul style="list-style-type: none"> • Ground level to Loftus Lane: 7.1m (including 4.9m road widening) • Podium to Loftus Lane: 4.9m • Levels 5-34 to Loftus Lane: 9m
Subway Lane	<ul style="list-style-type: none"> • Ground level to Subway Lane: 8.7m • Podium to Subway Lane: 6m • Levels 5-34 to Subway Lane: 7.3m
Western Boundary	<ul style="list-style-type: none"> • Ground level to Western Boundary: 0m • Podium to Western Boundary: 0m • Levels 5-34 to Western Boundary: 12m
Car Parking Spaces	<ul style="list-style-type: none"> • 352 total <ul style="list-style-type: none"> – Resident: 281 – Retail: 23 – Accessible: 48 – Visitor: 32
Bicycle Spaces	<ul style="list-style-type: none"> • 369 total <ul style="list-style-type: none"> – Residential: 318 – Visitor (residential): 32 – Retail (employees): 5 – Retail (visitor): 14
Communal Open Space	<ul style="list-style-type: none"> • 1,440m² (36%)
Deep Soil Area	<ul style="list-style-type: none"> • 8.1%

Total Landscaped Area	<ul style="list-style-type: none"> • 1,153.15m² (30%)
Construction Jobs	<ul style="list-style-type: none"> • 625 direct and 177 indirect FTE jobs
Capital Investment Value	<ul style="list-style-type: none"> • \$127,596,207

Source: *Environmental Impact Statement and Rezoning Report* - Colliers

It should be noted that the above Key Project Information is not consistently applied across all Appendices and as a result inconsistencies appear.

The Environmental Impact Statement and Rezoning Report, and associated Appendices, have been reviewed to inform the comments below. Council offers the following comments for consideration by the Department of Planning, Housing and Infrastructure in their assessment of SSD-81767963 Mixed Use Development 17-24 Loftus Crescent Homebush.

Priority Matters for Consideration

Public Benefit Offer and Intent to Enter into a Planning Agreement

Council notes the receipt of Appendix MM, being a Letter of Intent – Public Benefit Offer for the mixed-use development at 17–24 Loftus Crescent, Homebush, submitted by Homebush Developments No. 1 Pty Ltd (the Proponent). The Letter of Intent outlines the Proponent’s intention to enter into a Voluntary Planning Agreement (VPA) with Strathfield Municipal Council for the purposes of section 7.7(3) of the Environmental Planning and Assessment Act 1979.

It is Council’s understanding that the public benefit offer is made pursuant to section 7.7(3)(b) of the EP&A Act 1979 and is directly associated with the Proponent’s concurrent rezoning proposal, which seeks amendments to the Strathfield Local Environmental Plan 2012 (SLEP 2012). Specifically, the rezoning request proposes changes to the maximum height of buildings and floor space ratio controls applicable to the subject land.

Summary of Public Benefit Offer

COMPONENT	DESCRIPTION
Delivery of Affordable Housing	<ul style="list-style-type: none"> • Provision of 3.43% (13 apartments) affordable housing. • Affordable housing to be managed by Independent Community Living Australia
RESPONSE	<ul style="list-style-type: none"> – The required provision of Affordable Housing is 3% (i.e. 11 dwellings) – The minimum required provision has been exceeded by a Total 2 dwellings. – The proposed additional 2 affordable housing dwellings does not illustrate a genuine commitment to affordable housing provision or genuine ongoing community benefit.
Dedication of Land at Loftus Lane	<ul style="list-style-type: none"> • Provide 4.9m road widening for Loftus Lane (approx. 457sqm land area) • Dedicate road widening to Strathfield Municipal Council.
RESPONSE	<ul style="list-style-type: none"> – The Homebush Transport Oriented Development Precinct Design Guide Section 8 Design Guidelines – Environment, Sub-section 8.13

	<p>Dedication of land to Council requires under 8.13.1 Dedication of land for road widening requires:</p> <ol style="list-style-type: none"> 1. <i>A 4.9m strip of land for properties on the southern side of Loftus Lane, take from the property boundary will be subject to the dedication of land (for road/lane widening) without cost to Council. The area of land will be considered in calculating the permitted density of development.</i> <ul style="list-style-type: none"> - The assertion that the provision of required setbacks and associated land dedication constitutes a “public benefit” capable of justifying increases to the maximum floor space ratio and maximum building heights, and the resulting uplift in development potential, is unsubstantiated, and unfounded. These measures represent baseline development requirements necessary to facilitate orderly development of the land and achieve compliance with applicable planning and design controls. As such, they do not deliver any additional or extraordinary public benefit beyond what would ordinarily be expected of any development and cannot reasonably be relied upon to support significant departures from established planning parameters.
<p>Embellishment to footpaths / public domain</p>	<ul style="list-style-type: none"> • Streetscape works to full frontages of Loftus Lane, Loftus Crescent and Subway Lane. • Works to be undertaken in accordance with Council’s Public Domain Design Manual (standards and specifications).
<p>RESPONSE</p>	<ul style="list-style-type: none"> - The Homebush Transport Oriented Development Precinct Design Guide Section 4 Key Sites and Site Amalgamation, Sub-section 4.3 Infrastructure requirements and embellishment requires: <ol style="list-style-type: none"> 4. <i>Design of streets and pathways must adopt the relevant Council’s street design codes and public domain plan for a durable, manageable and consistent palette of materials used in the public domain. Materials must be of a high-quality finish and durability that is appropriate to the street type, pathway and/or open space function.</i> - The assertion that the provision of required streetscape and public domain improvement works constitutes a “public benefit” capable of justifying increases to the maximum floor space ratio, maximum building heights, and the resulting uplift in development potential is not accepted. Such works represent standard and expected development obligations necessary to achieve compliance with applicable planning, design, and public domain requirements. They do not deliver any additional or exceptional public benefit beyond what would ordinarily be required of development on the land and therefore cannot reasonably be relied upon to support significant departures from established planning controls.

It is noted that the proposed Public Benefit Offer is made on the basis that it will not offset, reduce, or otherwise replace the developer’s future financial obligations in relation to development contributions levied by Council under Sections 7.11 and 7.12 of the Environmental Planning and Assessment Act 1979.

Notwithstanding this, the proposed Public Benefit Offer fails to demonstrate any genuine commitment to the delivery of meaningful, tangible, or measurable public or community benefits. The development represents a significant overdevelopment of the site, and the benefits currently proposed are negligible and wholly inadequate when considered against the scale and intensity of the additional development capacity being sought. As such, Council does not accept the proponent's proposed Public Benefit Offer, and it should not be afforded any weight in the assessment or determination of the application.

Public Benefit Offer / Public Open Space Provision Consideration

Council proposes the applicant reconsider their public benefit offer and the design of their development to create an appropriately scaled and sustainable contribution of embellished public open space. Initial investigations by council officers have identified an area of approximately 500m² fronting Subway Lane to be the most suitable scale and location for quality urban open space to be provided. As a precedent for consideration, for Key Site 11 to secure the Height of Building and FSR Incentive Provisions it is required to embellish and dedicate 2,489m². Comparing the scale of this development proposal with the neighbouring site and its incentive provisions an area of 500m² high quality urban open space is considered a minimum starting point for the proposal at 17-24 Loftus Crescent to provide.

Council acknowledges provision of this quantum of open space would necessitate significant design changes to the proposal. Council considers this to be an opportunity to address several of the identified fundamental shortcomings of the scheme that have been outlined below, primarily the failure to appropriately setback the building and deliver the necessary Homebush TOD streetscape typical cross sections for both Neighbourhood Street and Yield Street requirements.

Should the proponent demonstrate a genuine willingness to engage with Council to negotiate the provision of substantial and proportionate public and community benefits, Council would welcome the opportunity to participate in further discussions.

Urban Design and Design Excellence

State Design Review Panel

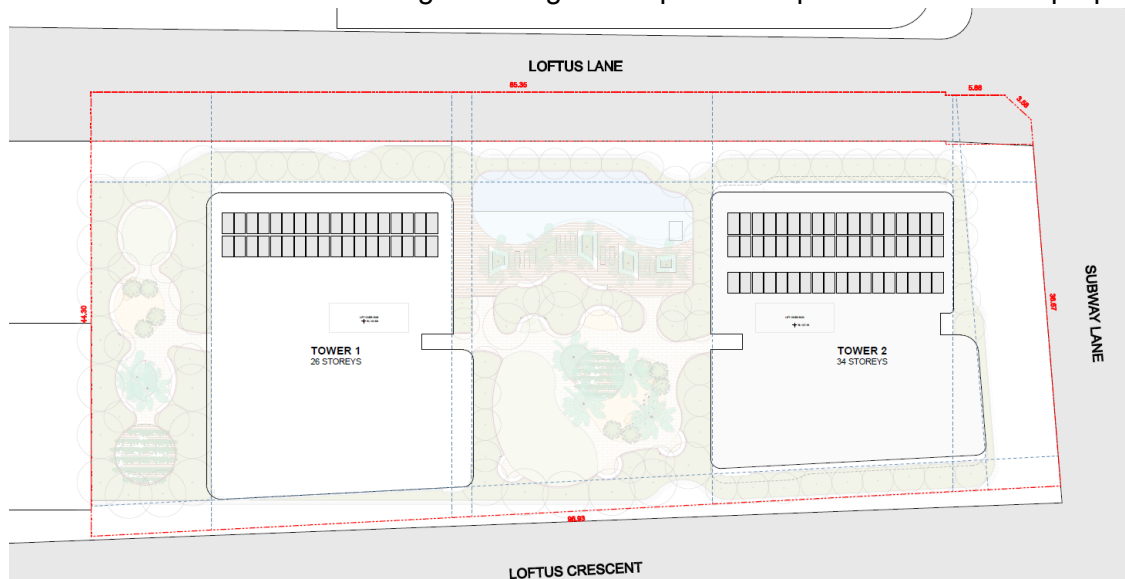
Council officers' note and provide the following summarised points to be addressed:

- Council previously requested the applicant be required to submit their proposal for design review by the State Design Review Panel in correspondence shared on 15 April 2025. Excusing such a significant development from appropriate design review based on the "SDRP Wait Time Reduction Scheme" is unacceptable. Once again Council encourages both the Department and the applicant to ensure the proposal undertakes detailed design review and is reviewed by SDRP.

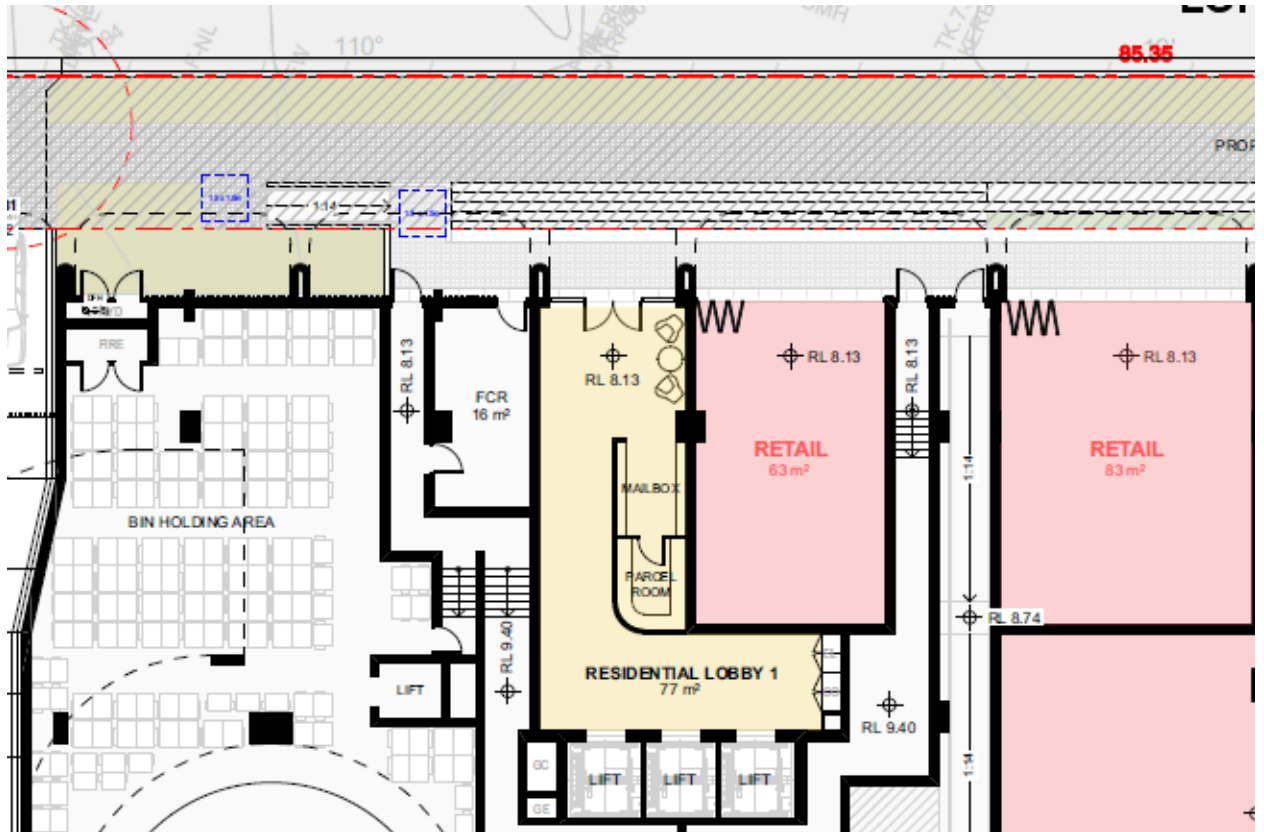
Architectural design comments

Council officers' note and provide the following summarised points to be addressed:

- The Site plan does not clearly describe all relevant building envelope controls (page 7 Architectural plans) and should be revised to be correct.
- Sections do not show important design considerations sufficiently at the scale they are provided. Sections at a much more detailed and greater scale of all three street frontages and interfaces are required and the podium design are requested, cutting through key locations such as the through site-link, bin lift, bin rooms and OSD tanks to assist with understanding the design and operational performance of the proposal.



- Bin movement from Basement 1 collection point to Ground floor bin room seems to be inefficient operationally. A single lift to provide vertical bin movement seems like a sub-optimal strategy and requires a low-tech (not reliant of mechanical systems) to facilitate bin movement.
- To encourage greater active transport usage, Council requests the applicant to add a bicycle parking room on the ground floor in lieu of 1, or part of 1 retail tenancy (e.g. the westernmost 63m² retail space). This space should include bicycle fixing facilities, such as a bike stand, tire pump etc. This space should be dedicated to daily commuter users within the strata management plan.

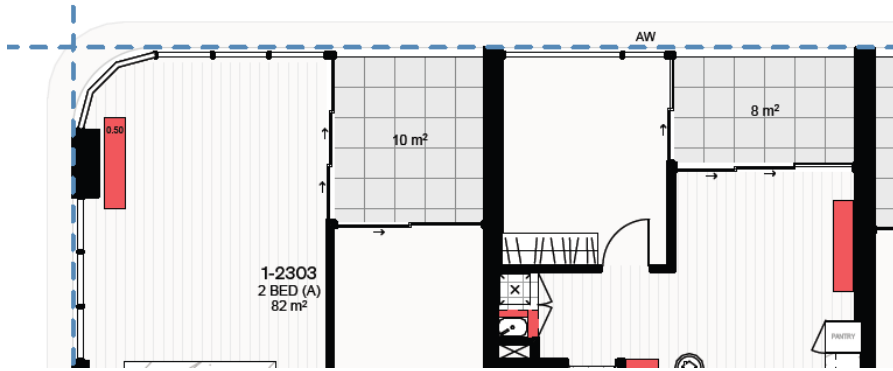


- Lack of passive surveillance after business hours
Levels 1, 2, and 3 are dedicated entirely to vehicle circulation and parking. While active uses are provided at ground level, there is a concern that after business hours (6 pm–7 am) there will be no passive surveillance or “eyes on the street” to maintain public safety in the surrounding public domain.

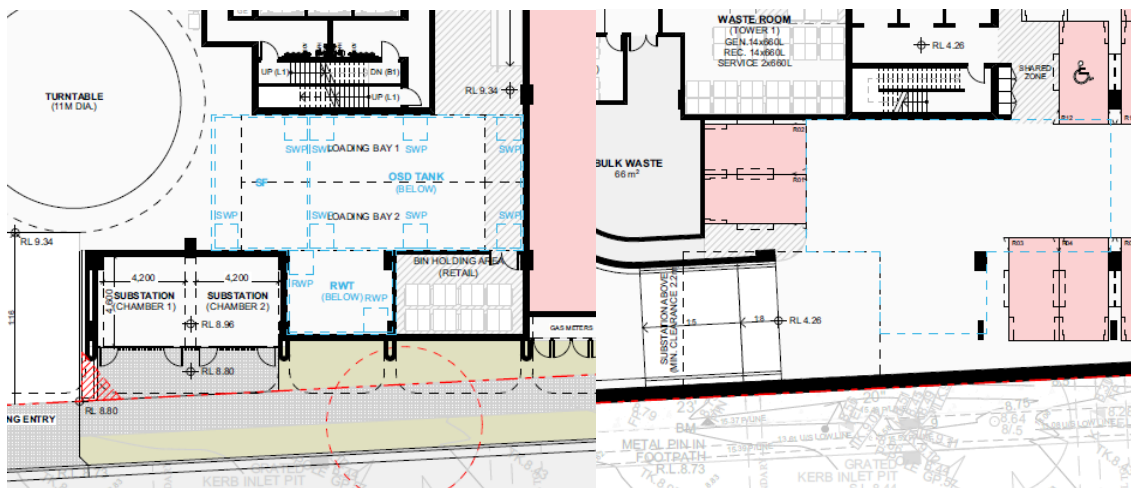
Recommendation:

The best practice is to provide apartment units to sleeve the car parking levels. At a minimum, this should be applied to the eastern frontage on Levels 1–3 to ensure habitable rooms or balconies overlook Subway Lane and its intersections with Loftus Crescent and Loftus Lane.

- As requested above, Council has identified the need for genuine public benefit to be offered by the proponent with a request being put forward for a minimum 500m² urban open space being suggested. It is acknowledged the provision of public and community benefits require design changes to the development and its interfaces with the street network.
- Meeting the internal storage requirements through the provision of a TV unit is not supported. Internal storage must be built in and provided by the applicant to meet minimum requirements.



- Space adequate for OSD tank is questioned since it is shown dashed on the Ground Floor Plan and is not shown correspondingly on the Basement 1 Floor Plan. The floor-to-floor heights on the Ground floor are generous and could more easily accommodate the tanks. Alternatively, due to the surplus provision of car parking spaces OSD and water re-use tanks could be located within parking spaces.

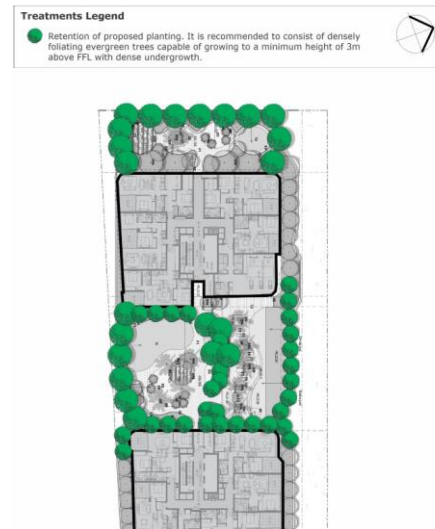
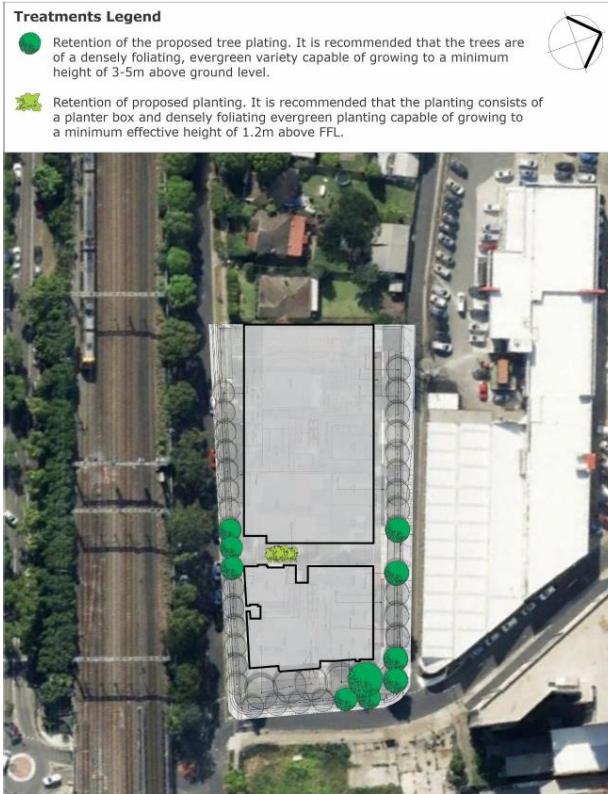


Pedestrian Wind Study

Council officers' note and provide the following summarised points to be addressed:

- The pedestrian wind study does not mention the downwash effect tall building induce and any mitigation measures within the private and public domains when proposing buildings of these heights. The study should encompass downwash effects including directional wind for a composite and complete analysis.
- Council encourages the applicant to consider adding glass or similar awnings around the perimeter of the towers within the podium level communal open space and within revised property boundary. This is to prevent falling objects from balconies injuring users whilst deflecting downwash wind away horizontally.

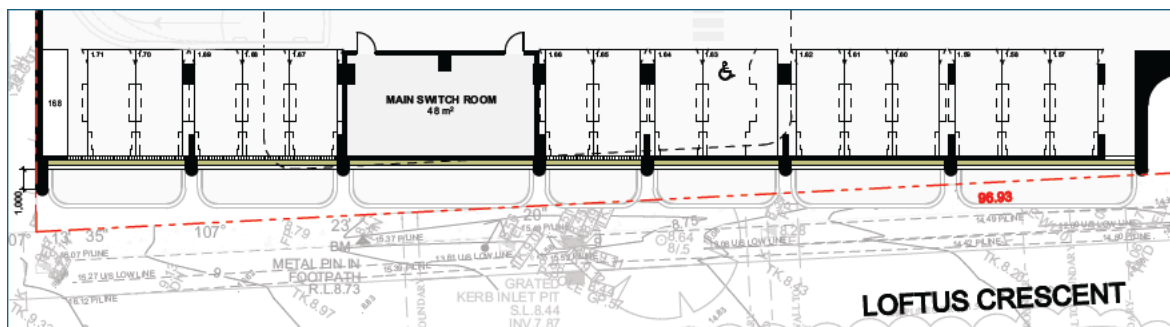
- If awnings are proposed over the public domain Council encourages the applicant to liaise with Council officers to ensure acceptance of the proposed structures.
- The through-site link experiences relatively high winds, albeit within the tolerances stated. However, the experience could be improved by introducing a revolving door on each end to act as a wind break and to greatly improve security in this space. A planter does not seem to be an adequate measure to maintain an environment conducive to commercial success of the businesses that address it.



Landscaping

Council officers' note and provide the following summarised points to be addressed:

- Inadequate planter dimensions
The proposed planters along the building frontage on Levels 1–3 do not have sufficient dimensions to support planting on structure. In some areas, the width is approximately 300 mm (see example in screenshot below).



Recommended approach:

Increase planter width to a minimum 1000 mm to ensure adequate soil volume for establishing and supporting landscape planting, consistent with the landscape effect shown in the proposal's 3D renders.

Public Domain

Council officers note and provide the following summarised points to be addressed:

It should be noted that Council officers shared Council's recently adopted Public Domain Design Manual with the project team and was subsequently not consulted regarding its incorporation into the proposed design. Specific required changes are:

- In conjunction with Council's request for the creation, embellishment and dedication of a minimum 500m² of high quality urban public domain fronting Subway Lane Council offers the opportunity to coordinate and collaborate together with the proponent on achieving a quality design outcome for this future community asset.
- It is requested that the granite paving proposed to the footpath areas around the development labeled 'P2' on the landscape plans be amended to reflect the correct specification shown in Strathfield Council's [Public Domain Design Manual \(PDDM\) – Addendum A Homebush TOD](#).
 - Loftus Crescent and Subway Lane are designated 'Neighbourhood Street' and the specification for this is Footpath Typology B.
 - Loftus Lane is designated 'Yield Street' and the specification for this is Footpath Typology C.
- The landscape architecture and civil engineering public domain paving specifications are not coordinated. The landscape architect is showing granite paving as mentioned above (labeled 'P2' on plans) to footpath areas around the development, while the civil engineer is showing standard concrete footpath with control and expansion joints at regular intervals. To resolve, Landscape architect should first update their plans to the specifications as mentioned in the first dot point above, and then civil engineer should update their plans to reflect this change.
- All garden beds are to be irrigated using harvested and collected rainwater runoff and supplemented by potable water as required.
- The through-site link on ground floor is supported but would benefit from increased design attention and enhanced intervention to ensure the space is activated and successful.
 - It is recommended the design incorporate fixed seating so that retail stores are not required to provide furniture in the laneway for activation, and that this seating and planting is extended further into the site-link onto the 1:21 slope. The slope should not be considered an obstacle to providing more seating and planting – options for levelling and terracing of the garden beds and seats can be considered. To further support the activation of the through-site link, value adds such as small fixed tables, charging ports, and higher bar tables for working should also be considered.
- The Level 4 plan is supported and the proposal appears to add meaningful forms of recreation to the eventual inhabitants of the development. Again, due to large areas of

planting requiring irrigation, innovative recycling methods should be explored to limit the water consumption of the development.

Urban Forest

Council officers note and provide the following summarised points to be addressed:

Council officers note that Thirty-five (35) trees are proposed to be planted in the street verge of Loftus Lane, Subway Lane, and Loftus Crescent. These 3 locations have different microclimates as well as fauna habitat requirements, which have not been met by the proposed 3 tree species selected on the Landscape Plan.

- Council requests a variation to the Tree species selected for Loftus Lane, Subway Lane and Loftus Crescent to be a mixed planting of small and taller street trees (8 meters to 30 meters), from the listed species that has been itemised in the Landscape Report Plant Palette, which are able to grow and survive in the microclimate they are proposed for, being north, east, or south (shade) and wind tunnelling.

A selection of mixed species trees in these areas should provide height variation, this in turn will provide shade for the pedestrian area as well as habitat requirements for fauna in the upper storey canopy trees. Variation in the tree species selection will also reduce the potential for disease to occur in the trees, which is common in a mono-culture planting, as suggested.

Council officers are willing to coordinate with the proponent to achieve the requested variation to the mix of species for each frontage and propose the following for consideration:

- Loftus Lane (avenue planting) – *Liriodendron tulipifera*
- Loftus Crescent (Eucalyptus sp.) – *Eucalyptus maculata*, *Corymbia citriodora*, *Eucalyptus amplifolia*, *Eucalyptus microcorys*

Waste

Council officers have reviewed the available information and the following comments are provided to be addressed:

Waste Collection Services

- The Waste Management Plan (WMP) indicates both Council and an external waste contractor will service residential waste on alternating schedules. The applicant must clarify whether Council or a private contractor will provide waste services. Council's standard service for multi-unit developments comprises weekly general waste (red lid) and fortnightly recycling (yellow lid) collection. Any additional services require engagement of a private contractor for all waste streams.
- The applicant must clarify whether waste compactors will be installed and operated on site.

FOGO Infrastructure

- FOGO bin storage areas must be designed with flexibility to accommodate current and future NSW Government and Council regulatory requirements.

Commercial Waste Services

- Council recommends the applicant reduce the proposed frequency of commercial waste collection services.
- The bin pathways for retail tenancies are unclear / not well defined. The applicant must provide detailed description of accessible routes from retail premises to the bin holding area, as no suitable pathway is currently evident.
- More information is required regarding whether public place bins within the footpath areas, the internal walkway of the building and other common areas, are being provided. This must be managed by the occupants, not Council.

Waste Chute Design

- The chute systems in both towers must align vertically on all levels and be fitted with clear, compliant signage.
- Residents must be informed that cardboard boxes and large recyclable materials are prohibited from being disposed via the waste chutes and must be taken directly to the bin room.

Bin Movement and Service Lift Capacity

- The provision of only one service lift to service waste rooms in both towers raises concerns regarding operational efficiency. The proposed bin pathways appear time-consuming and impractical for building management operations. The service lift dimensions must be increased to accommodate the volume of bins and movement frequency required for effective waste collection.

Ground Floor Bin Holding Area

- The applicant must clarify whether the ground floor bin holding area adjacent to the collection point will permanently house full bins or serve as a temporary staging area only. The current bin arrangement appears to provide insufficient space for safe and efficient maneuverability by waste contractors during collection operations.
- Wash bays and appropriate drainage must be provided in all areas containing bins.

Bulk Waste Management

- The location of the bulk waste room in the basement, with the collection area on the ground floor, presents significant logistical challenges. This arrangement may prove impractical for building management and could result in the loading area being inappropriately used for bulk waste storage.

Problem Waste Storage

- A dedicated problem waste area must be designated for items including e-waste, polystyrene, and batteries to ensure proper source separation and compliance with

waste regulations. This may be in the waste room or bulk room with clear signage to all occupants.

Compliance and Enforcement

- A litter and illegal dumping management plan must be included, clearly allocating responsibility to occupants for maintaining external areas, including retail frontages and outdoor dining spaces. The plan must include protocols for timely cleaning and litter reduction measures.
- Surveillance systems must be installed in all bin rooms, waste holding areas, and chute locations to assist in enforcing compliance and deterring contamination of waste streams, illegal dumping, and improper waste practices. The building manager will be responsible for enforcing compliance to prevent waste management, litter, and illegal dumping issues.

Council officers are willing to coordinate with the proponent to achieve the requested enhancements and improvements to all waste management matters identified above.

Traffic Assessment and Local Road Network

Council officers have reviewed the available information, and the following comments are provided to be addressed:

Car Parking Provision

It is noted in Appendix O - Transport Impact Assessment, prepared by Genesis Traffic, that the proposed provision of 352 car parking spaces exceeds the Homebush TOD Precinct Design Maximum Provision Rate of 319 spaces.

The provision exceeds the TOD parking rates by 33 spaces, comprising 26 residential spaces and 7 retail staff spaces. Notwithstanding this departure, the assessment considers the variation acceptable, however notes and requests that the DPHI assessment and determination take into account the need to enforce maximum parking provision rates within transport-oriented developments in this location.

As noted above, surplus car parking spaces may be suitable for utilisation for OSD and rainwater tank locations.

Bicycle Parking Provision

It is noted that the provision of 369 bicycle spaces is compliant with requirements.

Car Share Provision

It is noted that the requirements of the Homebush TOD Precinct Design Guide for Car Share Parking provision have not been adequately addressed or met. Defined 'Car Share' spaces have not been defined, and written evidence has not been provided with the development application demonstrating that offers of a car space to car-share providers have been made together with the outcome of the offers.

Considering the total number of parking spaces being proposed exceeds the maximum required, resolving the identification and provision of 'Car Share' spaces should be resolved within the existing maximum parking spaces.

It should also be noted that the 'Car Share' spaces are required to be serviced with shared EV connection(s). Car share space are not to be proposed on Council's public road network, unless formal agreement has been achieved in advance.

Electric Vehicle Charging Infrastructure Requirements

It is noted that the proposal has not addressed the requirements for the provision of electric vehicle charging infrastructure.

Homebush Transport Oriented Development Precinct Design Guide, 8.8.4 Electric vehicle charging infrastructure requires the following:

1. Car parking areas serving more than 3 dwellings must:

a) Provide an EV Ready Connection to all car parking spaces.

b) Provide EV Distribution Board(s) of sufficient size to allow connection of all EV Ready Connections and Shared EV connections.

c) Locate EV Distribution board(s) so that no future EV Ready Connection will require a cable of more than 50 metres from the parking bay to connect.

d) Identify on the plans submitted with the Development Application for the future installation location of the cable trays from the EV Distribution Board to the car spaces that are provided a Future EV connection, with confirmation of adequacy from an electrical engineer. Spatial allowances are to be made for cables trays and EV Distribution Board(s) when designing in other services.

2. All car share spaces and spaces allocated to visitors must have a Shared EV connection.

3. All non-residential building car parking must provide 1 Shared EV connection for every 10 commercial car spaces distributed throughout the carpark to provide equitable access across floors and floor plates.

Council requests the proponent address and satisfy the requirements for electric vehicle charging as required by the Homebush TOD Precinct Design Guide.

Swept Path

Swept Path analysis has been provided for the loading Dock areas for a HRV. In additional Swept Path using a B85 Car has been provided for the 5 parking level parking areas.

The Swept path analysis provided for both the loading dock area and the five parking levels is considered to be satisfactory.

New Boundary Alignment – Loftus Lane

The Architectural plans show that the section of Loftus Lane for the length of the property line has been set back for Road widening.

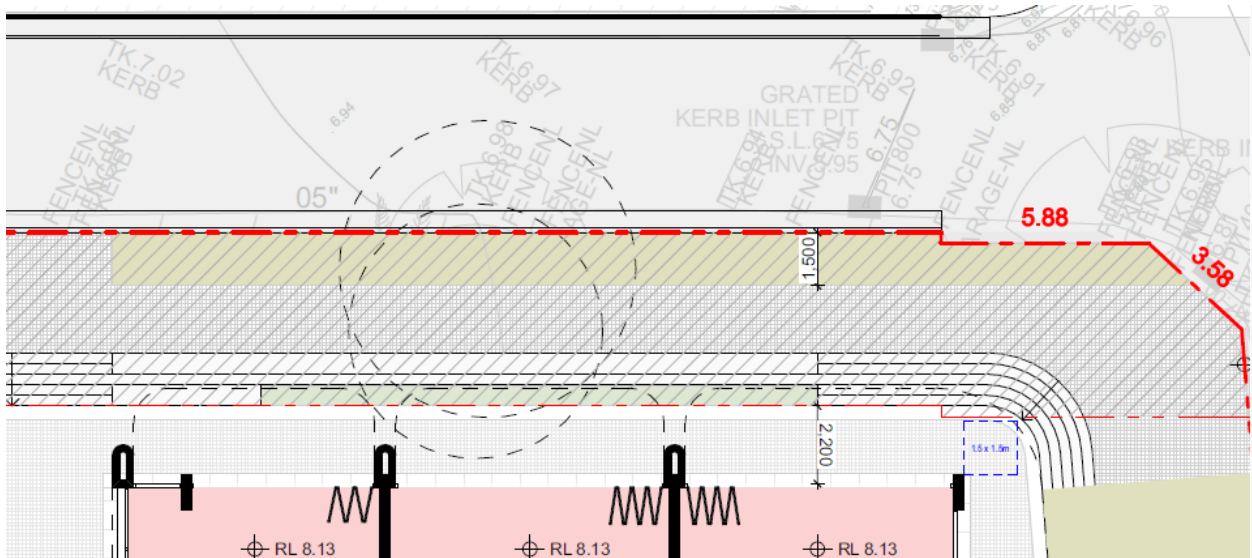
In accordance with the Homebush TOD Precinct Design Guide, **8.13.1 Dedication of land for road widening** (page 120) the following is applicable:

2. Where it is identified that a road or laneway is required to be widened to accommodate redevelopment of the surrounding area, the subject land will be dedicated without cost to Council. The area of the land to be dedicated will be considered in calculating the permitted density of development.

3. No permanent structure may be built above or below this area of land.

4. All building setbacks are to be measured from the relocated boundary and the laneway dedication is to be clearly identified on the plans lodged with the development application.

The Loftus Lane frontage requires re-design to comply with the above requirements. The structures shown encroaching beyond the required setback and dedication must be removed and designed into the site boundary that results after the required setback and dedication has been achieved. In this instance stairs, ramps, raised planter boxes and overhanging awnings are to be removed.



Extract of encroachments into Loftus Lane setback

New Boundary Alignment – Subway Lane

The Architectural plans show that the section of Loftus Lane for the length of the property line has been set back for Road widening under Council DCP. Additionally Subway Lane has also been set back to provide improved pedestrian footpath width. The basement is within the revised boundary alignment and does not encroach under or into the carriageway.

The Homebush Transport Oriented Development Precinct Design Guide establishes the Movement and Place Classifications throughout the Homebush TOD Precinct. Within the Precinct Design Guide, Figure 23: Movement and Place Plan (ARUP 2024) on page 70 classifies Loftus Crescent as a 'Neighbourhood Street'.

The Precinct Design Guide includes typical street plans and section for two (2x) Neighbourhood Street typologies, Figure 30: Neighbourhood Street with Parking Section and Figure 31: Neighbourhood Street with Bi-Directional Cycleway Section. The minimum street section widths (road reserve) for these neighbourhood streets are 18.8m and 19.6m, respectively.

In accordance with the Homebush TOD Precinct Design Guide, **8.13.1 Dedication of land for road widening** (page 120) the following is applicable:

2. Where it is identified that a road or laneway is required to be widened to accommodate redevelopment of the surrounding area, the subject land will be dedicated

without cost to Council. The area of the land to be dedicated will be considered in calculating the permitted density of development.

3. No permanent structure may be built above or below this area of land.

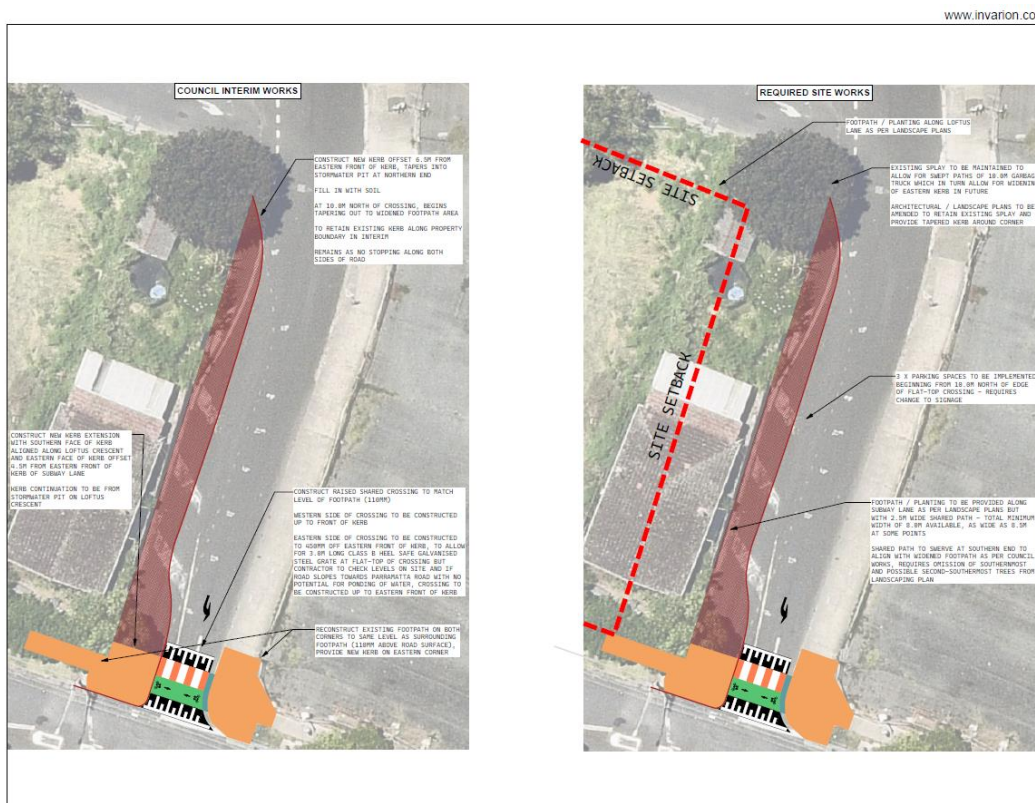
4. All building setbacks are to be measured from the relocated boundary and the laneway dedication is to be clearly identified on the plans lodged with the development application.

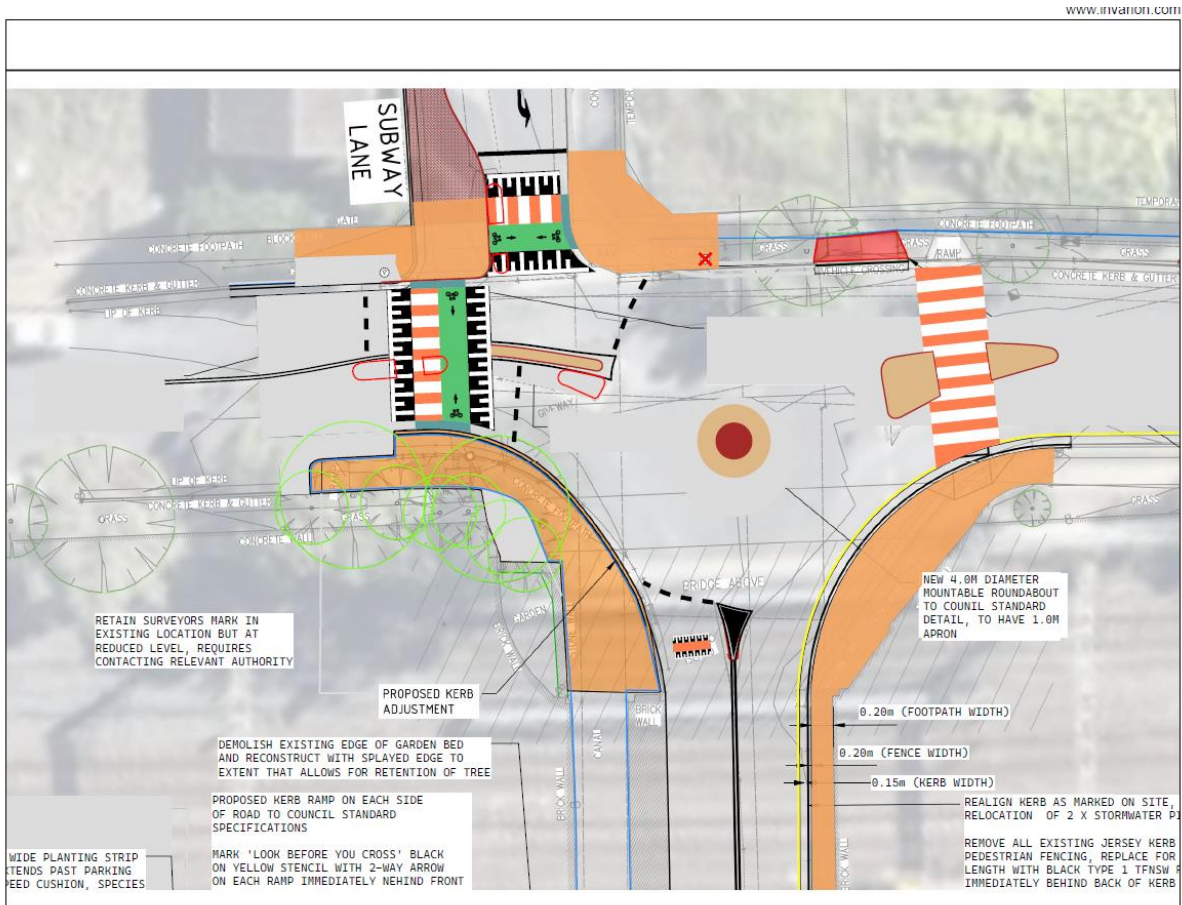
Since the existing Subway Lane road reserve varies in width from approximately 12m to 13m, and the defined future road reserve minimum width is 18.8m, the current proposal has not addressed the necessary setbacks, dedication and road reserve requirements for Subway Lane to be developed as a Neighbourhood Street.

Council requires the proponent to address the necessary design changes to ensure the 'Neighbourhood Street' road reserve, traffic lanes, footpaths and setback requirements are achieved for the future Subway Lane.

In addition to achieving the required Subway Lane new road reserve cross section and in conjunction with Council's request for the creation, embellishment and dedication of a minimum 500m² of high quality urban public domain fronting Subway Lane Council offers the opportunity to coordinate and collaborate together with the proponent on achieving a quality design outcome for this portion of the site and the future community asset being requested.

Additionally, for your information, please see schematic of the proposed kerb line and pedestrian and cycle improvements at the intersection of Subway Lane and Loftus Crescent. The works are part of a state Government Grant that must be completed by October 2026, and it is anticipated that the works in particular will be done in the April 2026 school Holidays.





The above information is provided for reference and to ensure design coordination and integration between Council's public infrastructure and the proposed development outcomes.

New Boundary Alignment – Loftus Crescent

The Homebush Transport Oriented Development Precinct Design Guide establishes the Movement and Place Classifications throughout the Homebush TOD Precinct. Within the Precinct Design Guide, Figure 23: Movement and Place Plan (ARUP 2024) on page 70 classifies Loftus Crescent as a 'Neighbourhood Street'.

The Precinct Design Guide includes typical street plans and section for two (2x) Neighbourhood Street typologies, Figure 30: Neighbourhood Street with Parking Section and Figure 31: Neighbourhood Street with Bi-Directional Cycleway Section. The minimum street section widths (road reserve) for these neighbourhood streets are 18.8m and 19.6m, respectively.

In accordance with the Homebush TOD Precinct Design Guide, **8.13.1 Dedication of land for road widening** (page 120) the following is applicable:

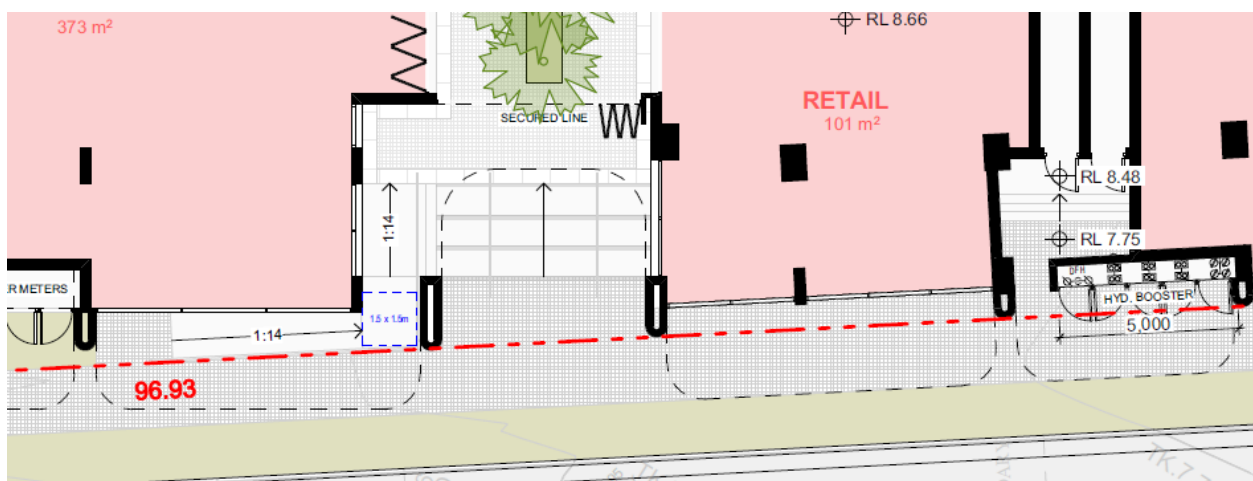
2. *Where it is identified that a road or laneway is required to be widened to accommodate redevelopment of the surrounding area, the subject land will be dedicated without cost to Council. The area of the land to be dedicated will be considered in calculating the permitted density of development.*
3. *No permanent structure may be built above or below this area of land.*

4. All building setbacks are to be measured from the relocated boundary and the laneway dedication is to be clearly identified on the plans lodged with the development application.

It is indicated on the survey plan (Appendix J – Survey Plan) that the distance from the brick wall defining the northern extent of the Main Western Railway Line and the southern boundary of the properties fronting Loftus Crescent is approximately 16.3m. Since the existing road reserve is approximately 16.3m and the defined future road reserve minimum width is 18.8m the current proposal has not addressed the necessary setbacks, dedication and road reserve requirements for Loftus Crescent to be developed as a Neighbourhood Street.

Council requires the proponent to address the necessary design changes to ensure the 'Neighbourhood Street' road reserve, traffic lanes, footpaths and setback requirements are achieved for the future Loftus Crescent.

The Loftus Lane frontage requires re-design to comply with the above requirements. The structures shown encroaching beyond the required setback and dedication must be removed and designed into the site boundary that results after the required setback and dedication has been achieved. In this instance overhanging awnings are to be removed. Additionally, the proposed access ramp along this frontage must retain a AS/NZS standard compliant width for the full length of the ramp and not diminish in width along the angled shop frontage.



Extract of Loftus Crescent encroachments and access ramp

Development Engineering

Council officers have reviewed the available information, and it is noted that Appendix M - Flood Impact and Risk Assessment Report showed the 1% flood levels, and the architectural and stormwater plans showed the finished ground levels and driveway crest levels, to have the required freeboard above those levels. Council officers also noted the provision of OSD and WSUD as being proposed.

Environmental Health

Council officers have reviewed the available information and provide the following comments:

Detailed Site Investigation (DSI)

Foundation Earth Sciences (FES) has prepared Appendix s Detailed Site Investigation (DSI) to support the application. The DSI included a review of site history, soil and groundwater

sampling, and an assessment of results against the National Environment Protection (Assessment of Site Contamination) Measure (NEPM 2013) residential criteria, with consideration of the proposed development layout and land uses.

The investigation identified limited exceedances of benzo(a)pyrene in shallow soils in two landscaped areas outside the proposed basement footprint, with no asbestos detected. Additionally, groundwater results were assessed as not presenting a significant concern, with elevated metals attributed to regional background conditions rather than site-specific sources.

Overall, the DSI concludes that the site can be made suitable for the proposed development, subject to the implementation of a Remediation Action Plan (RAP) and appropriate waste classification for any excavated material. Based on the information provided, the scope of investigation and conclusions appear reasonable and adequate for the rezoning and SSDA stage.

Remediation Action Plan (RAP)

FES has prepared *Appendix T – Remediation Action Plan (RAP)* in response to the DSI, which identified shallow benzo(a)pyrene-impacted fill at borehole locations BH12 and BH13, and the need for additional investigation beneath existing structures following demolition.

The adopted remediation strategy involves the removal of impacted soil material and off-site disposal to a licensed landfill, supported by staged site preparation, post-demolition investigation and delineation, classification and removal of contaminated material, and validation sampling and reporting.

The proposed remediation and validation methodology is consistent with relevant NSW EPA guidance and NEPM (2013) requirements. Subject to implementation of the RAP and confirmation through validation sampling that contaminant concentrations meet the adopted site criteria, the RAP is considered appropriate and adequate to enable the site to be made suitable for the proposed development.

Acoustic Report

Pulse White Noise Acoustics Pty Ltd prepared *Appendix FF – Noise and Vibration Impact Assessment* for the proposal. The assessment considers building envelope acoustic performance, mechanical plant noise, rail noise and vibration from adjacent lines, and traffic noise from surrounding roads.

Baseline noise monitoring was conducted and relevant NSW noise policies applied, including the *Noise Policy for Industry (2017)* and *Interim Construction Noise Guideline (2009)*. Indicative acoustic treatments are proposed to meet compliance targets for both external receivers and internal residential areas.

Although final plant selections are yet to be confirmed, the report concludes that compliant noise control is feasible. Rail vibration and road traffic impacts are assessed as manageable through standard design measures.

While “communal open space” is mentioned in the development description, it has not been acoustically assessed. This should be addressed in future stages to ensure amenity compliance.

Subject to submission of a detailed acoustic assessment prior to Construction Certificate, the report is considered adequate for the current stage. No significant deficiencies were identified that would warrant objection by Council.

Conclusion

Thank you again for the opportunity to provide feedback on this proposal.

As outlined throughout this submission, Council has raised multiple concerns regarding the proposed development, including the lack of a meaningful public benefit, excessive departures from planning controls, inadequate urban design response, insufficient community consultation, and unresolved technical and land dedication matters.

In its current form, the proposal represents a significant overdevelopment of the site, with building heights and floor space ratios far exceeding the strategic planning intent endorsed by the NSW Government in late 2024.

For these reasons, Council remains unsupportive of the proposal as presented. Council strongly encourages the Department to ensure that these issues are fully addressed before any approval is considered and to engage with Council and the local community to secure tangible, long-term benefits that justify any increase in development potential. The concerns raised reflect not only the interests of the local community but also the integrity of strategic planning and the long-term liveability of the area.

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