

28 May 2026

Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy St
PARRAMATTA NSW 2150

Att: Mr Aaron Hogan

Dear Sir,

SUBJECT: SSD-100271209 – REQUEST FOR COMMENT

Property: Lot 2 DP 1293342, Roy Watts Road, GLENFIELD

Development: Landcom's Glenfield affordable housing project

Thank you for the opportunity to comment on the subject state significant development proposal, submitted to the Department by Landcom.

The development site is located within an area of greenfield urban development to which it is acknowledged a concept approval applies.

The proposed building's architectural merit, site suitability and general compliance with planning controls and the concept approval are noted and recognised.

The Council has undertaken a review of the documentation made available on the major projects portal and provides the following comments on specific items of the development for your consideration.

Stormwater capture and disposal

According to the DRAINS model submitted under the concept approval (Council ref. 85/2025/DA-CD), 95% of the proposed Lot 12 area has been assumed as impervious in the design of the road drainage system.

However, sufficient information has not been submitted to demonstrate that stormwater from the proposed development can be discharged by gravity to the future drainage system in Water Avenue. Council suggests the provision of a computerised drainage model to ensure that water can reach the street by gravity.

With specific regard to the building's basement and stormwater, Council notes:

- i. No information has been provided regarding the basement drainage disposal method and its connection to the drainage system in Water Avenue.

- ii. As the driveway ramp to the basement carpark is proposed through a large open area between the northern and southern carparks, a significant volume of stormwater is likely to enter the basement during major storm events, which is not acceptable.
- iii. The basement ramp is not covered, contrary to Cl 4.13.8 of Council's Engineering Design for Development guide.
- iv. No information has been provided to demonstrate that the basement entry level is at or above the 1% AEP flood level within the access road, to ensure the basement is protected from flooding.

Further:

- v. It has not been demonstrated how overland flow paths within the enclosed area surrounded by the north and south buildings will be managed.
- vi. Finished surface levels have not been provided to demonstrate the overall management of overland flow paths across the site during major storm events.

Traffic, car parking and manoeuvring

Council's review of the proposal finds some deficiencies in the information provided to date. The follow is suggested to be reviewed by the DPHI in its assessment of the proposal:

1. Full-scale swept path diagrams for the largest vehicle intended to access and service the development site have not been provided to demonstrate that vehicle can enter and exit the site in a forward direction with a maximum three-point turn.
2. Swept path diagrams for the waste collection vehicle must be provided to demonstrate that the vehicle can safely enter and exit the proposed indented loading zone in a forward direction without adversely affecting traffic flow within the service laneway, should Council accept the proposed waste collection arrangement and loading bay location.
3. Swept path diagrams for critical parking spaces within the basement and at-grade parking areas have not been provided to demonstrate that vehicles can enter and exit the parking spaces in a forward direction with a maximum three-point turn.
4. Sufficient information has not been submitted to confirm the following:
 - i. Compliance of parking space dimensions, blind aisles, and aisle widths with the relevant User Class requirements of AS 2890.1.
 - ii. Compliance of parking spaces with the required clearances from adjacent obstructions.
 - iii. Compliance of driveway widths with Cl. 2.5.2 of AS 2890.1.
 - iv. Compliance of basement headroom clearance with Cl. 5.3 of AS2890.1
5. No detailed information has been submitted regarding the proposed indented loading bay within the service laneway.
6. A longitudinal section along the critical driveway alignment between laneway lip and the basement entry has not been provided to demonstrate that driveway gradients and grade transitions comply with the requirements of AS 2890.1 and Council's engineering specifications.

Waste management and collection

The Council's waste management section has reviewed the proposal and requests the following amendments or conditions of consent.

Bin Configuration:

The Waste Management Plan (WMP) currently proposes the use of 1,100L general waste bins. Given the potential for these bins to become excessively heavy when full, particularly in conjunction with the long transfer distances involved, it is recommended that they be replaced with 660L bins to reduce potential Work Health and Safety (WHS) risks. Accordingly, the WMP and architectural plans should be updated to reflect the following bin configuration and collection frequency requirements:

- North Tower: 5 x 660L general waste bins, serviced twice per week
- South Tower: 5 x 660L general waste bins, serviced twice per week

Bin Servicing:

The method of transporting bins from the waste collection points to the rear-loader collection vehicle is currently unclear. It is recommended that a Bin Presentation Plan be submitted demonstrating how the waste collection contractor will move bins between the waste collection point and the rear-loader vehicle, including details of pathway widths, gradients, and kerb and gutter conditions. Bins are to be transported along the kerbside via a continuous concrete pathway to the collection vehicle. The landscape plan will need to be amended to incorporate the required paved surface, and proposed landscaping may require relocation or removal accordingly.

Bulky waste:

The proposed bulky waste management arrangements require further clarification to ensure bulky waste items can be safely and efficiently transported from the bulky waste room to the waste collection point. The submitted documentation does not identify the equipment proposed to assist with the movement of bulky waste items, particularly given the size and weight of materials that may require handling. Accordingly, a further detail should be provided in the WMP that includes details of the equipment proposed to be used for the transportation of bulky waste items.

In addition, the bulky waste room within the southern building appears to have a smaller doorway width, which may limit the efficient movement of bulky items between the storage area and the waste collection point. To improve accessibility and operational functionality, the doorway should be widened to facilitate the safe and efficient transfer of bulky waste items.

Other waste management matters:

1. Upon the issue of the occupation certificate, should Council's waste management contractor be selected for collection services, Council and its waste collection contractor are indemnified against any loss, damage or injury that may occur during the onsite waste collection.
2. The caretaker or building manager is to present bins at the designated waste collection points by 6am on the collection days and return bins to the waste rooms promptly following servicing.

Thank you again for the opportunity to comment on the proposal. If you require any clarification on the items raised, please contact me on (02) 4645 4608 or by email.

Yours sincerely and on behalf of Campbelltown City Council,

A handwritten signature in black ink, appearing to be 'AM' followed by a stylized flourish.

Andrew MacGee

Coordinator Planning Engagement