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Contact: Bonnie Yue

Ref: SSD-81623209- MOD3

22 July 2026

Department of Planning Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124
Via: NSW Major Projects portal

Attention: Akshay Bishnoi

Dear Akshay,

**RE: SUBMISSION TO SSD-81623209-MOD3 AT 9-21 BEACONSFIELD PARADE,
LINDFIELD**

Thank you for the opportunity to comment on State Significant Development (SSD) application (SSD81623209-MOD3 for the Design Refinements) at 9-21 Beaconsfield Parade, Lindfield.

Following review of the amended documentation, please find at **Attachment 1** Councils comments to assist the Department of Planning Housing and Infrastructure (DPHI) assessment of this application.

Ku-Ring-Gai Council staff will be happy to discuss with the Department of Planning Housing and Infrastructure (DPHI) or the Applicant to clarify any issues. Should you have any further enquiries, please contact Bonnie Yue on 9424 0000 or via, byue@krg.nsw.gov.au.

Yours sincerely,

Selwyn Segall

Team Leader

Development Assessment Services

1. Section 7.11 Development Contributions

The approval for SSD-81623209 dated 13 February 2026 contains the following condition of consent:

INFRASTRUCTURE CONTRIBUTIONS

DEVELOPER CONTRIBUTIONS

- A6. 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 Ku-ring-gai Council's 7.11 Development Contribution Plan has been paid to Council. Council must be contacted for calculation of required contributions.

Ku-ring-gai Council issued a Notice of Payment for the s7.11 contributions on 15 April 2026. The net additional s7.11 contributions calculated in accordance with the current adopted s7.11 contributions plan (including inflation) have not yet reached the cap imposed by the Ministerial Direction for a 399-unit development. The March Quarter inflation was subsequently applied at the end of April. The amount remains below the cap in the current quarter.

On 24 June 2026, the proponent made a partial payment of the contributions, underpaying the total s7.11 contributions due and payable by **\$337,540.19**. Ku-ring-gai Council does not issue receipts for partial payments and has followed up with the proponent on 24 June 2026 and again on 14 July 2026.

Until the outstanding s7.11 contributions have been paid in full, and a receipt duly issued, in Council's view, compliance with the consent condition A6 remains outstanding. It is our understanding that in the absence of a receipt or a statement from Council verifying payment in full, a Construction Certificate cannot be validly issued. The current figures to the March Quarter 2026 are reiterated and we request payment in full. The proponents attention is drawn to the fact that further inflation is due after the issue of the Consumer Price Index on 29 July 2026. Should the amount remain outstanding at this date, further enforcement action will be triggered.

The amendment to the wording of Condition A6 as proposed is unacceptable.

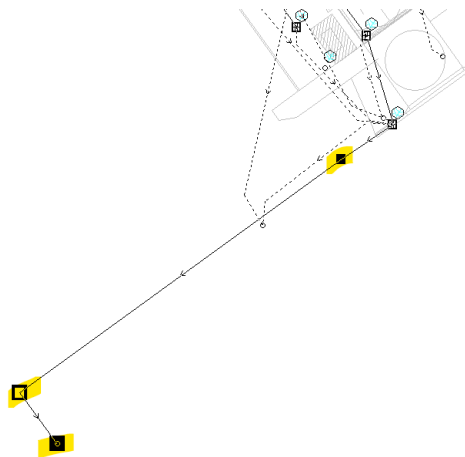
In addition to the above, the new unit mix proposed by this modification would generate additional development contributions of **\$8,342.77** (according to the March Quarter rate). This amount will further increase after the issue of the Consumer Price Index on 29 July 2026. It is recommended that an additional condition should be imposed for the contributions owing to the modification unit mix. The applicant shall contact Council for the up to date payment.

2. Engineering

The proposal is not supported by sufficient information.

Water Management

- a) Supporting hydraulic calculations are to be submitted to confirm that the pipeline to which connection is proposed has sufficient hydraulic capacity to accept the post developed flows. This shall be in the form of DRAINS modelling or similar. **Partially resolved. The DRAINS modelling showed a drainage system on the same side of the street. It is not clear whether the drainage system in the DRAINS' file is the existing system (opposite the street) or a proposed new system. The modelling file does not have overland flow for the pits along the roadway. Therefore, any result from this modelling file is not accurate and not acceptable.**



- b) No stormwater disposal system has been submitted for the two basement levels. Detailed drainage design of the subsoil drainage, pit and pipe system including the pump out tank which connects to a rising main to the OSD tank is to be submitted. **Not resolved. Plans not cited despite reference by the applicant's engineer stating have been addressed by the approved civil plans and stormwater report submitted and approved as part of the SSDA on 23/10/2025**
- c) No supporting calculation for the pump-out pit based on the 100-year 2 hour storm has been submitted. Not resolved. The response does not confirm the storage volume of the pump-out tank.
- d) The civil plan submission provided long sections of proposed drainage system with HGL levels without demonstrate which storm events of the HGL levels. Not resolved. Storm events from the HGL levels not specified.

Civil Plans

- a) A Civil design plan incorporating a drainage system longitudinal section showing the proposed underground trunk drainage extension/upgrade which includes the pipe size, class and type, pipe support type in accordance with AS 3725 or AS 2032 as appropriate, pipeline chainages, pipeline grade, hydraulic grade line and any other information necessary for the design and construction of the drainage system (i.e., utility services). The use of a computer software such as DRAINS modelling or equivalent is to be submitted to Council. Partially resolved.
- b) A Civil design is to be prepared by a suitably qualified Engineer detailing to show Council's standard footpath and kerb & gutter within the road reserve and as detailed in Council's drawing 2003-004 Rev. 'B'. A footpath longitudinal section will also need to show the extent of cut/fill, the existing services and existing street tree locations etc. The project arborist will need to endorse the civil plans. All redundant driveway crossing are to be shown to be removed. Partially resolved. Location of trees and services not shown as well as the civil plans being endorsed by the project arborist.

3. Parking provision and design

Car Parking

The following apartment breakdown was provided as part of the TIA:

Use	Market Housing	Affordable Housing
Studio	-	-
1 bedroom	62	10
2 bedroom	200	48
3+ bedroom	79	-
Total	341	58

Car parking provision has been assessed against the requirements of the TOD SEPP and the Ku-ring-gai DCP:

Parking type	TOD SEPP requirement	Ku-ring-gai DCP requirement	Proposed (Amended TIA)	Proposed (Amended Architectural Plans)
Residential - Market	350	402-540	424	428
Residential - Affordable	28	-	28	28
Visitor	-	67		25
Car Wash Bay	-	- can be shared with visitor parking bay		1
Total	378	469-607		482

The total quantum of spaces provided complies with the TOD SEPP and the Ku-ring-gai DCP requirements, however the quantity of visitor car parking does not comply with the Ku-ring-gai DCP requirement, with a shortfall of 42 visitor car parking spaces. This severe under-provision of on-site visitor car parking is not supported as kerbside parking in Beaconsfield Parade is currently subject to high demand due to its close proximity to Lindfield station and shops by commuters and retail/commercial staff.

Car share spaces

The Ku-ring-gai DCP requires car share spaces for residential developments of more than 90 dwellings, which would result in the requirement for at least 4 on-site car share parking spaces. These have been shown on the plans, and the previously agreed conditions should be imposed.

Bicycle Parking

Bicycle parking in storage cages (for residents) should allow for the space for a bicycle plus the minimum storage space requirement.

Servicing and Loading Bays

Defer to waste management team's comments on waste vehicle access and bulky goods waste collection.

Access Point

No change to previous arrangements, although aspects may need to change if access point and internal ramp need to accommodate Councils standard HRV waste collection vehicle.

In accordance with section P of Council's Traffic and Transport Policy, 'No Parking' restrictions for 6 metres on either side of the driveway are to be implemented prior to occupation. Council's fees and charges for referral to the Ku-ring-gai Traffic Committee and installation of signs apply.

Conclusions:

The following aspects of the application are not supported:

- a) The visitor car parking provision does not comply with the KDCP requirements.
- b) There is no information on practical access for residents to the loading dock to collect larger parcels, goods or groceries from, or if there is any communication or access between the Loading Dock and residents. A Loading Dock and Deliveries Management Plan would be required so that there is coordination between the loading dock and home deliveries/groceries etc.

The following requires clarification:

- a) Bicycle parking in storage cages (for residents) should allow for the space for a bicycle plus the minimum storage space requirement for each unit.

4. Waste management issues

Food Organics and Garden Organics

- a) Six FO rooms have been provided in Basement 1. This is considered an inappropriate FO collection method as residents are highly unlikely to walk to the basement to use the FO bins when there is a chute and bin system on each floor.
- b) Some FO carting paths for residents to the FO bins from the lifts is along the traffic aisle of the basement.

Amendments required:

A bin room on each floor needs to be provided, which includes a FO bin, yellow lid, blue lid and chute. This room is to be mechanically ventilated and drain to sewer. The manager will be responsible for collecting the bins from each floor and decanting them into larger bins in the bin holding room.

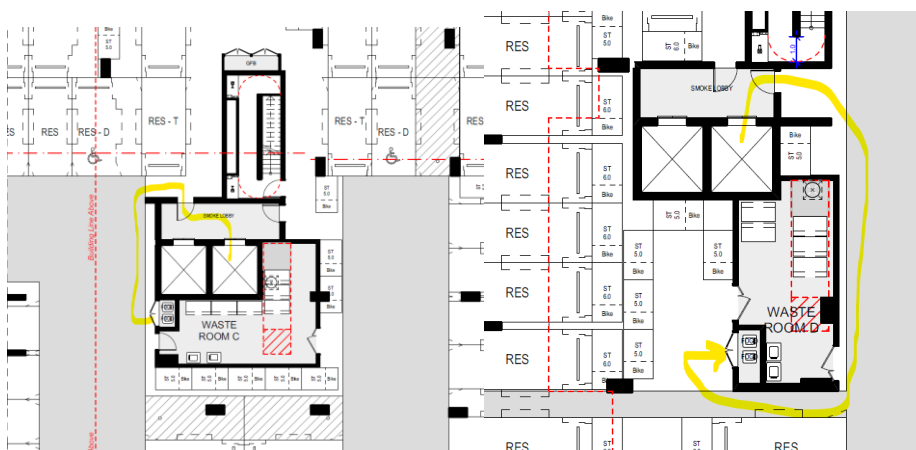


Image 1: FO carting paths for residents – across traffic areas.

Individual Unit- waste infrastructure

- a) It is assumed that the waste management plan nominates be space in the kitchen area for waste separate bins. There needs provision for 4 separate bins (waste/ recycling/ paper and other)
- b) Space on the kitchen bench for a kitchen caddy needs to be allowed for, to collect FO.

Amendments required:

Separate waste/ recycling bin for each unit.

Waste Loading Bay

This development will be serviced with a HRV. The loading dock needs to be designed to accommodate a HRV incl 30T weight and as per AS2890.2

- a) The loading bay as access and space for a MRV and SRV.
- b) The bin holding area is too congested and bins are triple stacked. A collection vehicle for one type of bin will not be able to access all the required bin in this layout.
- c) Bins are stored between two levels of the basement, with a ramp or platform lift. This is considered an inefficient and unacceptable storage solution. All bins and storage areas need to be at loading dock level. The collection crew will not be moving bins between the two levels.

Amendments required:

- a) Confirm sufficient access for HRV waste vehicle and safe access for the collection crew.
- b) Confirm loading location for bulky waste. Confirm how the waste will get from the storage room to loading dock. It is not appropriate to be at different levels.
- c) A Loading Dock Management Plan is to be designed and implemented including booking priority access times for residential waste vehicles (**Note:** there will be up to 8 collection vehicles per week for residential waste.)
- d) All carting paths need to be shown on the plan for the manager to move bins from each bin room to the storage room.
- e) A cart and trailer will need to be provided along with a storage space to park the equipment.
- f) A bin lifter will need to be provided.

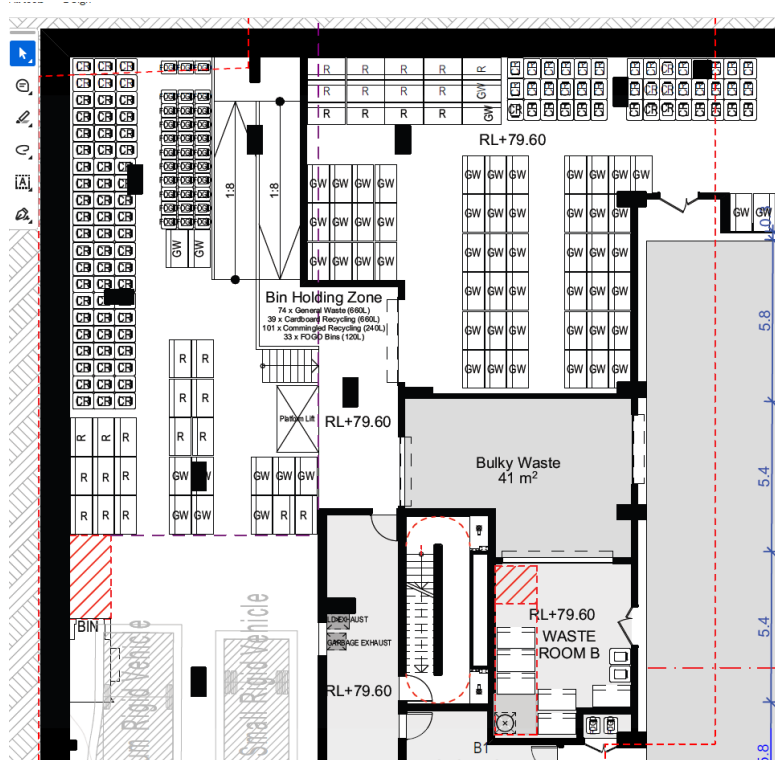


Image 2 – loading dock area

Truck access

- Finished ceiling to floor height clearance of 4.5m is required for waste vehicle. The clearance height includes space for lights, fire system, cable trays etc. for both waste loading dock and delivery dock. Image 4 seems to illustrate this.
- Turn templates need to be provided to ensure clearance for the waste loading dock

Amendments required:

- Confirmation of HRV access as per AS2890.2 needs to be provided
- Confirmation of turn template needs to be provided for the waste HRV vehicle entrance and exit for the site.

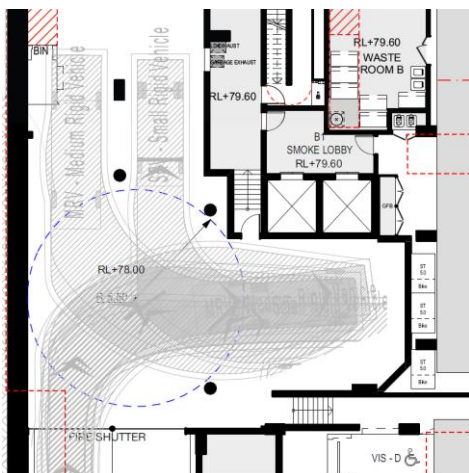


Image 3: Turn area for waste truck

- d) On top of this, three days capacity needs to be provided within in each bin room on each floor, this is in case the building manager is away or a long weekends/ public holidays.

Amendments required:

- a) Redesign all waste bins and chute to be in a room on each floor.
- b) FO collection is to occur on each level in each bin room

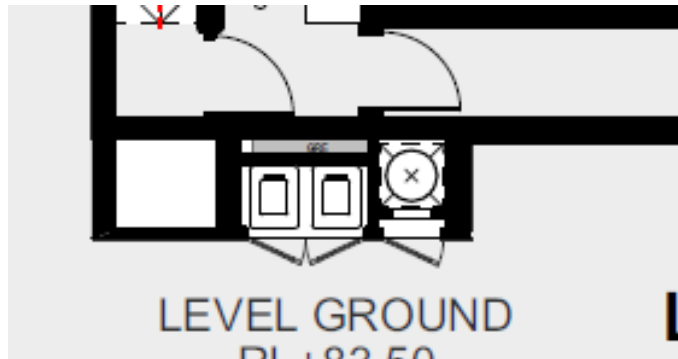


Image 6: Bin infrastructure on each floor

Basement level Waste Chute room

- a) 6 chute rooms are provided across the basement level.
- b) 660L bins are proposed. Council proposes to upsize these to 1100L bins to reduce the number of bins required on site.
- c) It is unclear regarding the proposed chute system. A linear system will be required to automatically move bins under the chute. There needs to be 3 days capacity under the chute. It is unclear the layout of this system as currently show it is incorrect and will not work for most of the chute rooms e.g. A, B, D, E & F

Amendments required:

- a) Ensure there is mechanical bin changing system under each chute.
- b) Amend the chute rooms to allow linneras to automatically move bins along. Note: there needs to be space on either side the chute for bins to move under it.
- c) Provide carting path maps from the chute rooms to the bin storage room.
- d) Remove separate FO bin rooms.

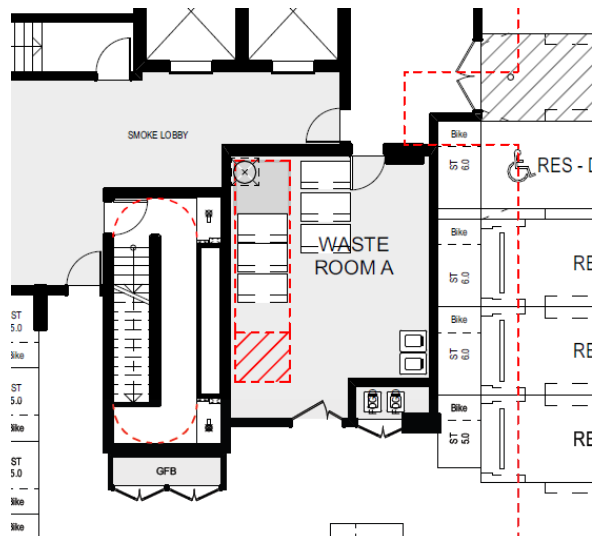
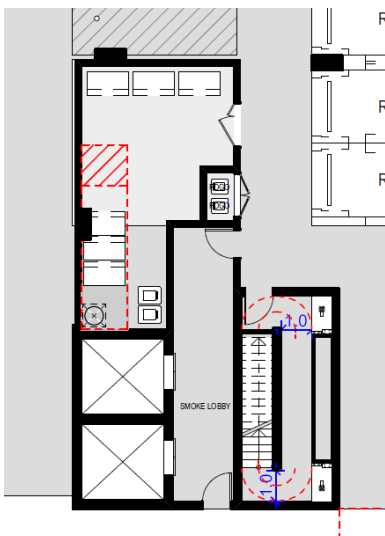
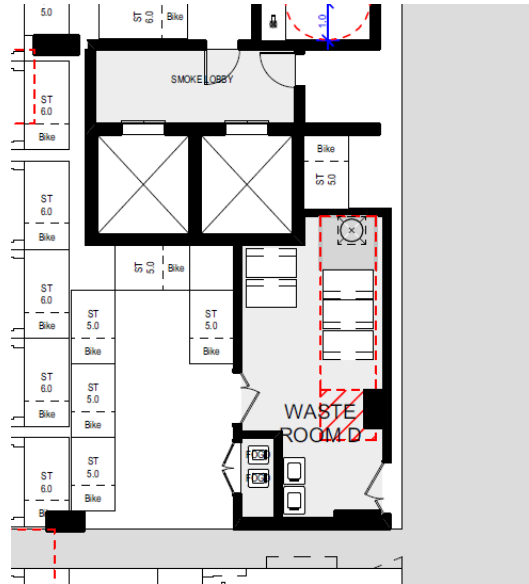
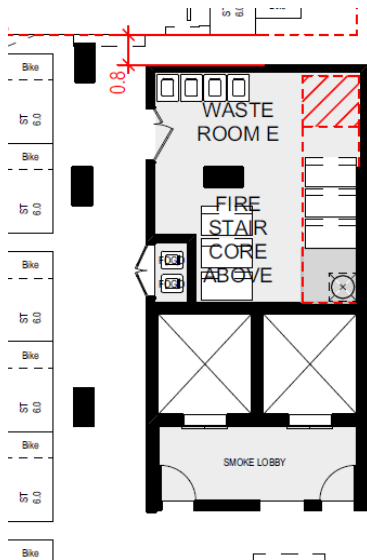
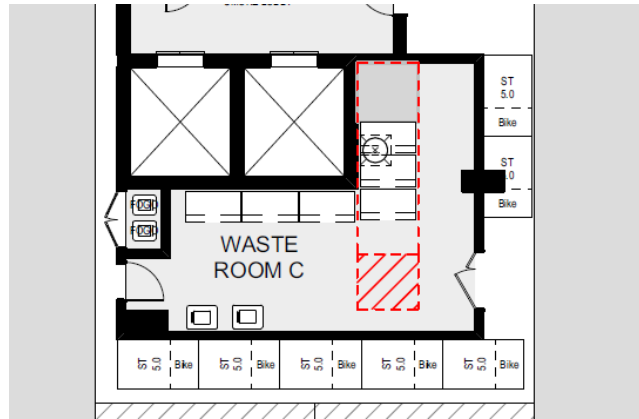
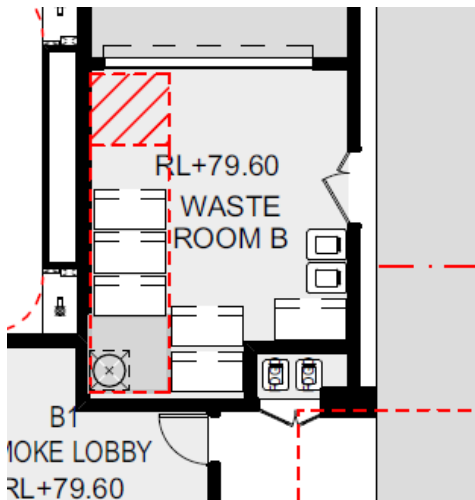


Image 7: Chute rooms

Waste holding room

- a) Residential waste holding room will need to hold
 - i. 22 x 1100L waste bins
 - ii. 19 x 660L yellow container recycling bins
 - iii. 19 x 660L blue paper bins
 - iv. 21 x 240L FO bins

These bins will be serviced twice a week.

- b) Council will consider these larger compactor bins (image 8) to service all residential waste across the site. Note height reequipments for this size bin.
- c) The layout of this area is too complicated for the building manager and collection crew and will involve too much time in moving bins. A more efficient layout needs to be considered e.g. all same type of bin is kept together and accessible easily by the collection crew without having to hunt through the area for all bins.

Amendments required:

- a) Redesign / resize for new bin sizes and bin numbers.
- b) Ensure area is at one level
- c) Confirm where the pylons are within the basement area, especially the waste areas.



Example of a hook-lift compaction container

Image 8: compactor waste bin

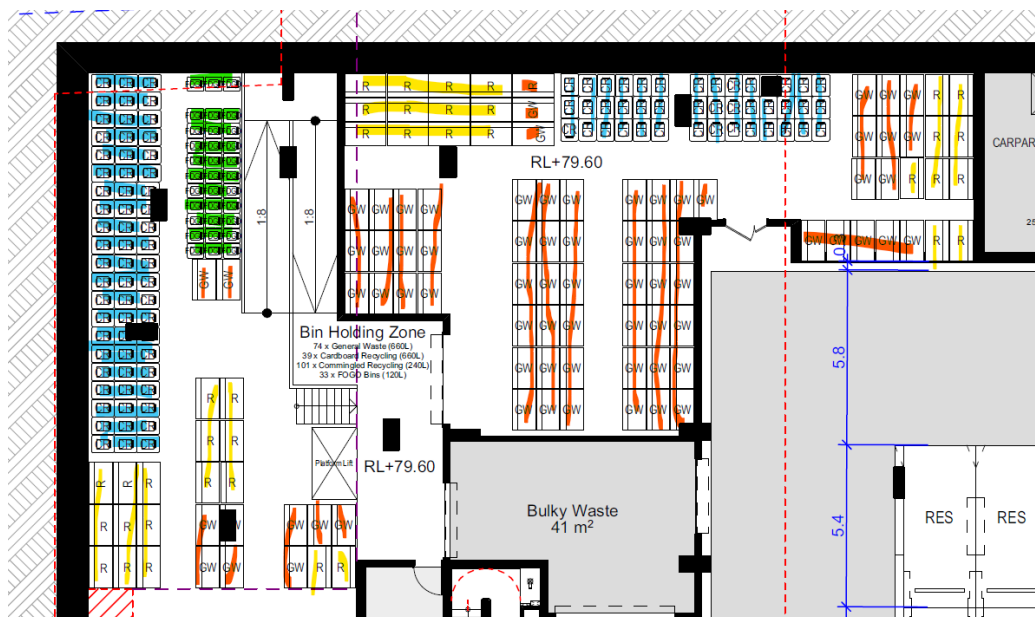


Image 9: Bin holding area

Bulky waste

- a) There is insufficient bulky waste holding area. The room is 41m² and should be 49.3m².
- b) Concerns are raised over the required size of the room and ability for management to keep it in a tidy and safe manor.
- c) The ramp carting option is over (30m?), and a cart and tug will need to move the material this distance and be able to access the ramp.

Amendments required:

- a) It must be demonstrated how the building manager will move the bulky waste from the room to the collection location in a safe manner. It is inappropriate via the platform lift due to time and WHS considerations. If the ramp is used, it needs to be demonstrated how a cart and trailer will fit.
- b) A bin tug and cart need to be provided for the manager to cart the items
- c) Information needs to be provided on how the residents will deliver the items safely to the bulky waste room or where the collection points for management to pick it up from, are located. It is suggested a space is allocated near each lift for residents to leave their items and management move them to the bulky waste room.

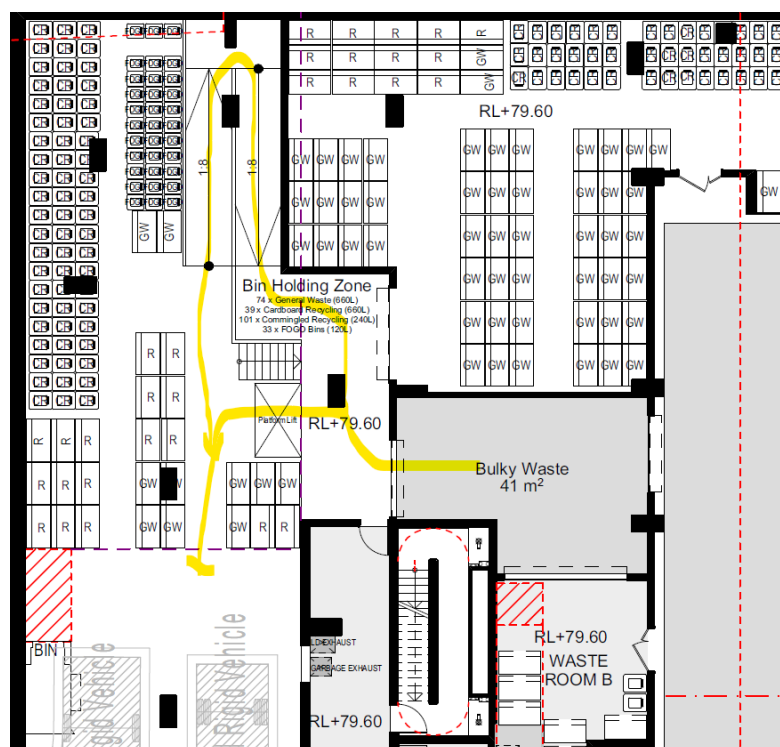


Image 10: bulky waste storage.

Additional Recycling Opportunity

- a) Consideration needs to be given for additional recycling opportunities for residents e.g. e-waste, clothing, polystyrene etc. Space needs to be allocations for these.

Amendments required:

It is suggested a 4 x 4 m be allocated.

Building manager will be required to:

- a) Move full bins from bin rooms on each floor to bin holding room.
- b) Move bulky waste from storage room to presentation area.

Other additional conditions

- a) All doorways 2m wide for bin rooms
- b) All bin rooms must have mechanical ventilation.
- c) All waste rooms floor waste to sewer
- d) All waste rooms to have tap and hose

END OF SUBMISSION