



Your ref: SSD-71488960
File no: MC-24-00005

17 December 2024

NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001
Recipient Delivery anthony.kunz@planning.nsw.gov.au

Attention: Anthony Kunz

Dear Mr Kunz

SSD 71488960 for In-fill Affordable Housing, Schofields

Thank you for your correspondence dated 11 November 2024 requesting our advice on the proposed In-fill Affordable Housing at 108 Burdekin Road Schofields, which is considered a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we object to the proposal until all our issues listed in the Attachment to this letter are addressed in a revised Environmental Impact Statement and amended plans. We request that the information required is referred back to us for reconsideration before any determination is made.

If you would like to discuss this matter further, please contact Coordinator Development Assessment, Sami Ahangari on 9839 6213.

Yours faithfully

Judith Portelli
Manager Development Assessment

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown Council's submission to SSD 71488960 for In-fill Affordable Housing, Schofields

1. Planning issues

- a. Variation to minimum dimension of deep soil zone – Chapter 4 Design of residential apartment development State Environmental Planning Policy (Housing) 2021 applies to the proposed development, which requires consideration under the Apartment Design Guide (ADG).

The proposed basement rear setback of 2 m and setbacks less than 6 m on all sides result in non-compliance with the minimum dimension requirement of 6 m (3E Deep soil zones ADG). It is acknowledged that the quantum of deep soil across the site exceeds the ADG requirement. However, we have consistently applied the minimum setback requirement to the basement in the Growth centre area and there appears to be no valid justification to support the variation and so will set a precedent. The applicant is required to amend the plans such that the first 3 m of the side and rear setback is a deep soil zone.

- b. The applicant is required to provide a revised Basement Plan to comply with the basement setback controls, indicating the dimensions of the basement setback from all site boundaries.
- c. We also have concerns regarding the adequacy of the proposed parking provision. It is acknowledged that the provision of 31 car parking spaces complies with the requirements of the Housing SEPP, which is likely to be further reduced due to the necessary basement plan amendments. The site also forms a part of Landcom's Demonstration Precinct under Blacktown Growth Centres Development Control Plan 2010 Schedule 1 Alex Avenue Precinct, which was intended for low - medium density residential development, low scale apartments, liveable and green streets, with limited on-street parking opportunities in designated areas due to the reduced carriageway of the streets. Consequentially the likely demand for parking from this proposal will congest the local road network, causing complaints from residents in the low rise housing across the site. The applicant should consider reducing the scale of the development to comply with the objectives of Landcom's Demonstration Precinct or providing more onsite parking.

2. Traffic

- a. The applicant proposes to undertake all road works around the site as approved on 28 October 2020 by Sydney Central City Planning Panel under SPP-19-00010. Road no.1 to the south of the site is currently approved as 8 m carriageway, intended for low – medium density residential use as envisaged in the site specific DCP. However, any proposal for residential flat building requires a minimum of 11 m wide carriageway on the streets along all frontages of the development site. The applicant should address this requirement considering the current approval, and the resulting

non-compliance with the site -specific Master Plan and controls under Section 4 of the DCP Schedule 1 Alex Avenue Precinct.

3. Drainage engineering

Council's Drainage Engineering section does support the application due to the following reasons:

- a. Supporting documents shall be provided in electronic format for assessment:
 - i. MUSIC model shall be provided to confirm the reduction target is achieved.
- b. The submitted Stormwater SSDA package, AT & I, Project Number 24-1174, Revision C and dated 02/08/24 shall be amended:
 - i. The plan indicates all surface inlets pit will be fitted with Ocean guard. However, there are 7 surface inlets in the submitted plan when only 3 Ocean guards were indicated in the layout of the MUSIC. Further, the depth of the surface pit may be suitable to the installation of the Ocean Guard.
 - ii. In dwg 24-1174-DAC450, it is unclear how the area 4 can be connected into the proposed filter tank without any surface pits when the northern boundary is higher than the south boundary.
 - iii. The drainage catchment planned and MUSIC catchment plan are not consistent on the western side of the property. The by-pass area to the rainwater tank and filter tank are different in two catchment plans.

The requested model and an amended plan must be provided for further assessment.

4. Waste

- a. The applicant has elected waste collection be undertaken by a private waste contractor, using a small rigid vehicle. Applicant should strongly reconsider designing the provision for waste collection. The smallest waste collection vehicle in Councils' fleet is 10.5-meter-long heavy rigid vehicle – failure to accommodate onsite manoeuvrability of a heavy rigid vehicle will result in Council not servicing the site for the lifetime of the development.
- b. If the latter is to be the case, then conditions and legal covenant must be placed on the title of this land to warn owners and occupiers that Council will never be able to service this development in the future.
- c. Access for collection vehicles must be designed in accordance with Australian Standards, showing forward truck entry and exit and in all manoeuvring areas to Council's satisfaction. This must be submitted to Council's waste section for approval. Please provide the AutoCAD file in DWG format and 1:1 scale for the trucks entire travel path in addition to the proposed swept paths.
- d. The Applicant must amend the Waste Management Plan. It must be prepared in consultation with Council to address the requirements in 'Blacktown Development

Control Plan 2015 – Part G, Waste management and minimisation', which will be referred back to Council's waste section for consideration.

- e. Waste, recycling and bulky waste must be collected onsite from the basement loading bay by a private contractor in perpetuity.

5. Environmental Health

- a. The Site Audit Statement dated 24 June 2020 submitted with the SSD application identifies the intended use of the site for low density residential development. The proposed development for a residential flat building will require an amended SAS to confirm the suitability of the site for the proposed high density use.