

29 August 2025

Edwina Ross
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Dear Edwina Ross,

**Cover Letter to Submission - State Significant Development
(SSD-80432461) – Infill Affordable Housing at 2-6 Pilgrim Avenue and 11-13 Albert
Road, Strathfield**

Thank you for the opportunity to provide comments on the proposed SSD – for demolition of existing structures and construction of infill affordable housing development at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield. Council staff have reviewed the proposal and prepared a submission which is attached below.

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 Louise Gibson – Senior Planner on 9748 9999 or louise.gibson@strathfield.nsw.gov.au for any further correspondence or to discuss Council's input.

Regards,



Paul Reid
Acting Director, Planning & Environment

Strathfield Council Submission to State Significant Development (SSD-80432461) – Infill Affordable Housing Development – August 2025

Strathfield welcomes the opportunity to provide comments on the application for SSD – Infill Affordable Housing Development. It is understood that the proposed works include:

- Site preparation works, including demolition of existing structures, removal of twenty-six (26) trees, and bulk excavation.
- Construction and operation of a 20-storey (plus roof plant) mixed-use development comprising shop top housing with ground level commercial uses, including:
 - Two (2) commercial tenancies and residential lobbies at Ground Level;
 - A 4-storey podium, including 1,600m² of communal open space including two community rooms;
 - Two (2) 20-storey residential towers; and
 - 228 residential apartments, including 35 infill affordable apartments, throughout the podium and towers.
- Provision of four (4) levels of basement parking with a total of 237 car parking spaces comprising:
 - 195 residential car parking spaces (including 35 accessible spaces);
 - 17 commercial car parking spaces (including 2 accessible spaces); and
 - 25 visitor car parking spaces (including 3 accessible spaces).
- Street tree planting and landscaping, extension and augmentation of services and infrastructure as required

Council has now reviewed the Environmental Impact Statement (EIS) and other supporting documentation. The following comments are provided for consideration by the Department of Planning, Housing and Infrastructure.

Urban Design

Further assessment is required to adequately demonstrate how the proposal will integrate with the surrounding streetscape, particularly noting its interface with surrounding residential areas (including views across the railway line. The following considerations should be made:

- Additional visual impact assessment should consider views with and without tree cover on the site in order to provide a more accurate representation of how the development will appear from all views looking toward the site.

With regard to internal amenity of the development, the following should also be considered:

- Winter garden design should be more carefully considered with specific regards to maintaining cross ventilation whilst addressing anti-throw requirements for the adjoining railway line.
- Council does not support cross-ventilation via plenums. It is strongly recommended that apartments are converted (where possible) into 2-storey 3+ bedroom units in order to achieve the following:

- a. Cross-ventilation (single aspect 2-storey is considered cross-ventilated in the ADG
- b. Increase the % of 3-bedders. 7% is not close enough to a minimum 10% in the ADG, Homebush TOD's 20% mandate and Strathfield councils own strategic plan.

Landscaping

The increase in street trees along Albert Rod and Pilgrim Avenue is generally supported. Tree 2 *Tristaniopsis laurina* (SRZ 2.76m TPZ 6.4m) located on Pilgrim Avenue is to be retained and protected as it appears to be in good health and condition. The tree provides a remarkable canopy for its species, contributing to the urban canopy coverage of Strathfield. Note from onsite inspection canopy does not overhang development boundary.

The architecture/landscape drawings propose removal of Tree 2 to incorporate on street parking. Council would like to see the integration of street parking that retains the tree. Please refer to example below of Watsons Street, Neutral Bay where raised permeable pavement parking spaces have been integrated with retention of the existing Brush box street trees.



Figure 1: Example of Trees and street parking in Watsons Street Neutral Bay.



Figure 2: Tree 2 located on Pilgrim Avenue.

In addition to the above, the application should include the following information:

- Trees on neighboring property 9 Albert Rd, Strathfield NSW 2135 (Petrol Station)
- The development will impact trees neighboring the site
- The proposed excavation for the basement levels can potentially have significant impact on trees within the petrol station bordering the development. Trees impacted include T27-T34 and T3-10.
- It is unclear as to what impact the development will have on the root systems. There is an existing retaining wall unknown if tree roots are beyond that.
- Impact of solar access and wind conditions will be significantly altered for neighbouring and street trees.
- Construction of the development will have significant impact on the canopies of the trees. It appears that extensive canopy pruning will be required.

The proposal should follow a similar setback to that approved under the previous application on the site (DA2020/256). This would enable improved separation from the row of neighbouring trees to 9 Albert Road and will be less likely to adversely impact the root systems along with providing more deep soil zone for the site.

Traffic Assessment

The following additional information should be provided as part of the application:

- Preparation of a Travel Plan, a key feature of the Travel Plan will include a plan detailing the location of all public transport services 10-minute as key facilities such as banks, post office etc. located within a 5 minute and 10-minute walking radius of the site. This would link up with Council future Cycleway network that will run along the southern side of Albert Road into the Strathfield Town Centre.
- Working hours should be as per the approved consent conditions which in Strathfield LGA are typically between 7:00am to 5:00pm Monday to Friday and 8:00am to 1:00pm on Saturday. No work is to be carried out on Sundays or Public Holidays.
- A *Works Zone* will need to be implemented along the eastern side of Pilgrim Avenue to facilitate ease of construction. The *Works Zone* parking restrictions, if required, would apply during working hours only and are provided specifically for the set down and pick-up of materials and not for the parking of private vehicles associated with the site.

Development Engineering

The flood study stated that there are no differences in flood levels between existing and proposed developed conditions, except some ponding up to 350mm in pockets.

It concluded that there was a decrease of up to 47mm at Albert St, and in the same conclusion an increase of up to 300mm at the southeastern and southwestern corners (basically Albert St frontage).

The overland flood levels range between RL 19.4m AHD and RL 19.9m AHD. While the proposed ground floor levels appear to be above the flood levels, the study stated there was no need to set a minimum crest level in the driveway leading to the 4-level basement. Architectural plans show the driveway level below the flood level.

The driveway should have a crest level of a minimum RL 9.9m AHD located at least 2m inside the boundary line.

The Geotechnical Investigation report stated that the basement level is about 13.5m below ground level. However, Borehole depths stopped at 11-11.5m below ground level. There was no indication of action to be taken to assess the last 2 m.

The following amendments are required before the proposal can be supported in this regard:

- Clarification as to whether the flood levels increasing or decreasing at Albert Road frontage.
- Provision of crest in the driveway at a minimum RL 9.9m AHD, to be located inside the property.
- Statement regarding the assessment of the last 2m of excavation depth.

Environmental Health

The application should include, but not be limited to the following information:

Clarification of Proposed Uses

The final development application must clearly define all proposed land uses within the development, including but not limited to:

- Commercial and retail tenancies
- Communal and rooftop spaces
- Parking areas (including loading dock operations, deliveries etc.)
- Plant and mechanical equipment areas
- A full description, specifications and management / maintenance plan of the reduction noise fencing / screens (refer to Section 8.1.2) sound barrier placement around the perimeter of the communal area.
- Visual assessment for outdoor lighting (reference to 2 commercial tenancies).

Mechanical Plants Recommendations

- Prior to CC, the locations of mechanical plants such as ventilation for the underground carpark and air conditioning units are to be identified on the plans, with the appropriate acoustic screening where applicable and submitted to Council for assessment of suitability.
- All AC Condenser Units and outdoor air-conditioning units to be acoustically enclosed or set away by more than 3.0m from any boundary with a sound power level of each unit no more than 65 dB(A). Submission of a full description, specification and management / maintenance plan of acoustic attenuation and locations.

Acid Sulfate Soils

An assessment in relation to contaminated lands and acid sulfate soils, where excavation is concerned in relation to the underground carpark.

Acoustic Matters

- An acoustic assessment of the proposed development has been previously carried out as part of a previous approved DA by Dural Group (Revised November 29th, 2021). The unattended noise measurements were carried out fronting the Railway line at Point A from 05.11.2020 till 12.11.2020 and facing the existing Service Station, and Raw Square in the line of Site of Albert St at Point B A from 10.06.2021 till 17.06.2021.
- On the 5th and 8th of November 2024 (over 4 days), an engineer from this office visited the site and carried out noise measurements to verify the noise results carried out by Dural Group. However, the background noise testing component of the assessment is to be carried out over a minimum of five (5) days as the development is located near a railway line, which can potentially create noise above normal background level.
- Acoustic report assessing the potential noise impacts during evening hours to the proposed 10:00pm.

Acoustic Consultant Qualifications and Reporting Requirements

It is noted that ANAVS does not appear on the list of members of the Association of Australasian Acoustical Consultants (AAAC). An acoustic report should be prepared by an appropriately qualified acoustic consultant who meets the technical eligibility criteria required for membership of the AAAC and/or holds Member grade of the Australian Acoustical Society (MAAS).

The acoustic assessment must address the following key areas:

- Noise intrusion from the adjacent rail line, with reference to compliance with the State Environmental Planning Policy (Infrastructure) 2007.
- Noise emissions generated by the development, including but not limited to: Mechanical plant (e.g. air conditioning units, roller doors)
- Ventilation systems for the underground car park
- Noise and vibration impacts associated with demolition and construction activities

The report must be prepared in accordance with the following relevant guidelines:

- NSW Environment Protection Authority (EPA) Industrial Noise Policy
- NSW Department of Planning and Infrastructure – Development Near Rail Corridors and Busy Roads: Interim Guideline
- NSW EPA Interim Construction Noise Guideline

Compliance with these standards is essential to ensure a robust and reliable assessment of noise impacts and the implementation of appropriate mitigation strategies.

Plan of Management (PoM)

The PoM is essential for understanding how the proposed use will be managed on an ongoing basis. At a minimum, it should include:

- Hours of operation – to assess potential amenity impacts on nearby residents and land uses.
- Complaint management system – to ensure there is a clear, accountable process for responding to any community concerns.

Proximity to Adjacent Petrol Station – Excavation Considerations

It is noted that there is a petrol station located adjacent to the site. This presents potential contamination and safety risks, particularly in relation to excavation activities associated with the proposed development.

Given the nature of the neighbouring land use, the following should be addressed:

- A Contamination Assessment should be undertaken in accordance with the NSW EPA Guidelines and SEPP (Resilience and Hazards) 2021, to assess the potential for soil or groundwater contamination resulting from historical or ongoing activities at the adjoining service station.
- The Geotechnical and Environmental Reports should consider any risks posed by vapours, underground storage tanks, or contaminated soil, and provide recommendations for safe excavation and disposal of spoil.

- A Site Management Plan should be prepared to outline procedures for excavation, including safety measures, monitoring, and mitigation of potential contamination or vapour intrusion during construction.
- Include details of a Remediation plan. The developer must act immediately if contamination is discovered during excavation near a petrol station. In the event that contamination is confirmed, a remediation plan must be developed and approved.

This may involve:

- Excavating and removing contaminated soil.
- Treating groundwater.
- Installing barriers or vapor mitigation systems.

These considerations are essential to ensure the health and safety of workers, future occupants, and the surrounding community, and to ensure compliance with relevant planning and environmental requirements.

Preliminary Site Investigation – Contamination and Remediation Considerations

The Preliminary Site Investigation dated 31 March 2025 includes limited sampling and identifies the need for further investigation and risk management measures prior to redevelopment. Given the proximity of the adjoining petrol station and the proposed basement excavation, a number of critical actions are recommended to manage potential environmental and human health risks:

- Hazardous Materials Survey Prior to any demolition works, a Hazardous Materials Survey must be carried out on all existing site structures to identify potentially hazardous building materials, such as but not limited to asbestos, lead-based paint, or synthetic mineral fibres, that could be released during demolition.
- Review of Adjacent Service Station Reports A review of available environmental and contamination reports previously prepared for the adjoining service station site should be undertaken to inform risk assessments and guide remedial strategies.
- Preparation and Implementation of a Remedial Action Plan (RAP)
- A comprehensive Remedial Action Plan (RAP) should be developed to address contamination risks and guide site remediation.
- Supplementary investigations to address the data gaps identified in the Preliminary Site Investigation.
- Specific remediation requirements for Underground Petroleum Storage System (UPSS) decommissioning, in accordance with the Protection of the Environment Operations (UPSS) Regulation 2014 and associated EPA guidance documents.
- Procedures for the classification of excavated soils in line with the NSW EPA Waste Classification Guidelines (2014), to enable proper off-site disposal.
- A Sampling and Analysis Quality Plan (SAQP) for validation of all on-site remediation activities.

Geotechnical Report – Outdated Site Investigation

It is noted that the geotechnical report references site coring conducted on 26 October 2020 (refer to page 28). This investigation is now almost five years old and may no longer accurately reflect the current site conditions, particularly if there have been changes in the local environment, nearby developments, or ground stability.

It is recommended that the geotechnical report be updated or supplemented with a more recent investigation to ensure that design assumptions for structural, excavation, and foundation works remain valid and compliant with current standards and site conditions.

Waste Management

FOGO Waste

There is a lack of FOGO/FO planning for waste management. NSW EPA's 2030 FOGO mandate means that MUDs will require a FOGO or FO management system. This is a requirement for all Council serviced buildings. The WMP and waste rooms must be flexible enough to deal with the requirements set out by the EPA. Whilst the current DCP and LEP does not detail this, the development must be prepared to have enough space when it is required.

Waste Management Plan

Section 5.5. of the submitted Waste Management Plan should be amended to say the collection frequency is general waste is one (1) service per week and recycling is one (1) per fortnight.

The waste vehicle must enter and exit in a forward direction from the building.

WMP must include a litter management plan in the WMP and outline that the occupant must take all practicable steps to ensure that the area of public footpath or public area adjacent to the premises within a 50m radius is maintained in a clean and tidy condition.

Bulky Goods Management

The bulky goods area is to be managed appropriately by the building manager and they must schedule regular clean up collections with Council in advance. The building should advocate for reuse and repair initiatives in the building to avoid accumulating unnecessary waste. The building manager should oversee the stacking of items in this area to ensure that collection can be done safely by Council staff.

Additional area could be allocated for future recycling initiatives – i.e., in building textile recycling bins or in-house compost areas.

Waste Chute System

In the event of the chute system jamming, the WMP should detail a contingency plan for handling waste that does not cause major disruptions to day-to-day waste management. On site compaction should be considered for a building of this size.

Commercial Recycling Schedule

I raise concerns regarding the proposed commercial recycling schedule. The collection frequency should be reduced to one service per week. Bin rooms must have adequate capacity to store approximately 835 liters of recycling materials between collections.

Overall, from an Environmental Health perspective, the submitted documentation appears insufficient to support progression of the SSD.

Conclusion

Thank you again for the opportunity to provide feedback on your SSD. As addressed above, Council has raised concerns over the development as it pertains to urban design, tree management, traffic, site contamination, acoustics, waste management & development engineering.