

27 October 2025

Tia Mills
Senior Planning Officer
Department of Planning, Housing and Infrastructure

Dear Tia

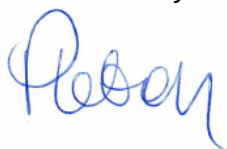
Re: Canterbury Bankstown City Council Submission to the State Significant Development Application, SSD-83256463 – 150 The Boulevard and 34 Dudley Street, Punchbowl, Punchbowl, Homes NSW Affordable Housing Development

Thank you for the opportunity to provide comment in response to the applicant's submission for the State Significant Development (SSD) Application SSD-83256463 for the proposed affordable housing redevelopment at 150 The Boulevard and 34 Dudley Street, Punchbowl, Punchbowl. Council has reviewed the documentation made available on the Planning Portal website and enclosed with this letter is Council's response to the SSD Application.

Based on our review of the application, Council generally supports the proposed development, subject to a number of revisions to the design and some additional information to address matters raised by Council. Council's feedback and comments are summarised in Attachment A and B.

If you require any clarification or have any enquiries regarding the feedback provided, please feel free to contact me on 02 9707 5593 or Patrick.Lebon@cbc.city.nsw.gov.au.

Yours sincerely



Patrick Lebon
Coordinator Strategic Assessments
Canterbury Bankstown Council

Attachments:

- A - Summary of Additional Information, Amendments and Recommended Conditions of Consent Requested by Council
- B – Detailed Comments

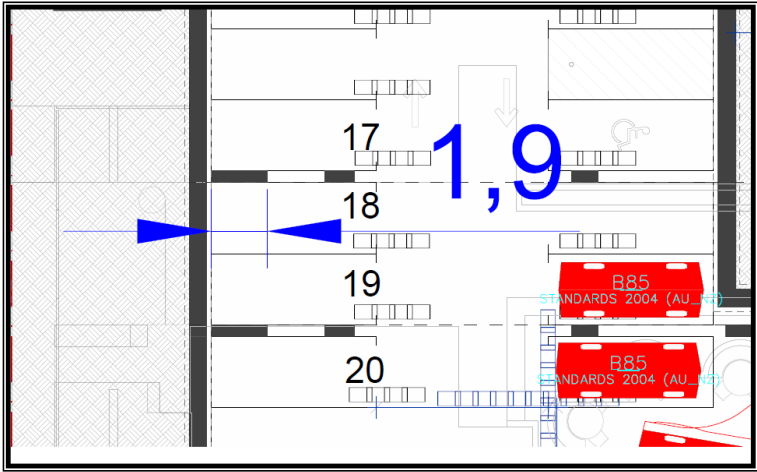


Attachment A - Summary of Additional Information, Amendments and Recommended Conditions of Consent Requested by Council

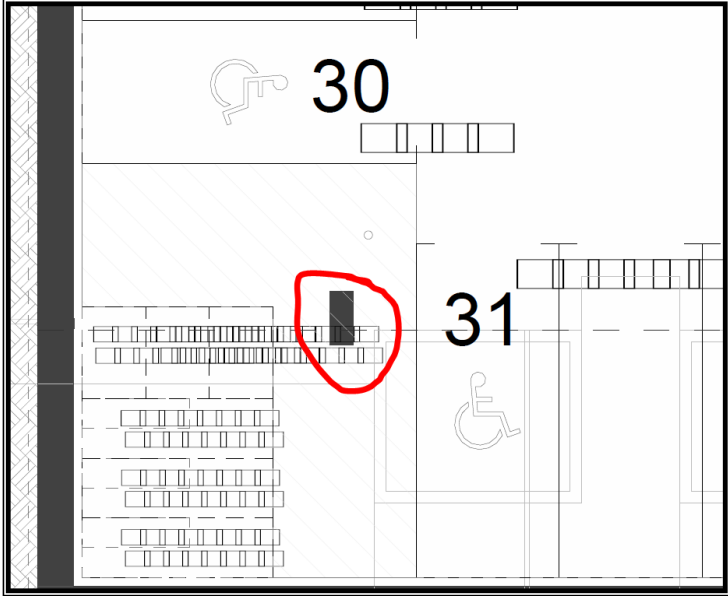
Category	Additional information requested	Recommended design and/or plan changes	Recommended conditions of consent and/or staging
Engineering Services		Revised plans	
Stormwater - Asset Systems & Planning	• A service protection report • Structural condition report	• Pit Connection details • New stormwater pit and pipe details	• Drainage easement • Pre and Post-Construction CCTV report
Tree Assessment			Full compliance with all the recommendations of the Arborise Report
Resource Recovery/ Waste Management		• Corridor and bin carting routes • Waste room door • Waste collection room size	
Town Planning – Development Assessments	• RLs to be shown on plans • Written advice on varying of development standards (draft EPI) • DCP car parking assessment	Compliance with building separation (ADG s.3F)	
3D Model (digital)	Digital 3D model		
Urban Design		A number of changes are recommended – refer to comments in Attachment B	
Payment of Section 7.11 or 7.12 Development Contributions	Clarification of applicability		
Payment of fee – Post Consent Compliance	Applicant to note this fee requirement		



Attachment B - Detailed Comments

Category	Council Feedback
Engineering Services	Stormwater 1.1 The proposed design of the underground On-Site Detention (OSD) will not be supported with its current connection to the new inlet pit within Dudley Street, because proposed OSD storage will not be achieved as intended due to backwater effects, drowned orifice and dead storage. 1.2 The proposed design is intrusive requiring the installation of a new 375 Ø new concrete pipe (approximately 25m long along the kerb line within Dudley Street). The site enjoys a generous natural slope which provides an ideal platform for a less intrusive stormwater design following the natural slope, where stormwater can easily be discharged onto the kerb within The Boulevard without the need for a new street stormwater system along Dudley Street, this kind of design is reserved for difficult, restricted and flat site with hardly any slope, which is not the case for the subject site. <u>Recommendation:</u> It is strongly recommended that the stormwater drainage design should be prepared by an engineer with relevant hydraulic design experience. Basement car park 1.3 The location of structural column between spaces 17 & 18 and 19 & 20 do not comply with Figure 5.2 Design Envelope Around Parked Vehicles of AS2890.1 (as shown in below snippet).  1.4 The shared area next to dedicate space No. 31 is restricted with the structural column, this area shall be unobstructed for it to be a functional space (as shown in below snippet).

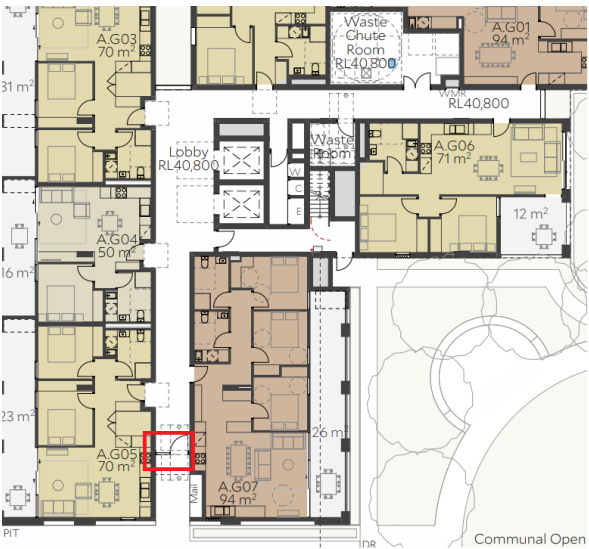


Category	Council Feedback
	 <u>Recommendation:</u> Revised plans to be submitted that address the matters raised in items 1.3 and 1.4 above.
Stormwater - Asset Systems & Planning	1.1 Stormwater – Easement – Council’s mapping records outlines the approximate location of an existing Council Street stormwater pipeline 525mm Ø which appears to traverse within the site frontage (as shown in below snippet). A service protection report shall be provided to accurately locate the stormwater pipe, a formal drainage easement will be required to be established and registered where the location of the pipe is indeed within the front setback of the site. 



Category	Council Feedback
	1.2 Connection to Council's Existing Stormwater Pit <u>Recommendations:</u> • Pit Connection Details - Confirm the size and depth of existing pit being connected into, and invert levels of existing pipe immediately located downstream. Ensure that the proposed design allows stormwater to drain by gravity. • Structural Condition - Confirm if the existing pit being connected into is structurally adequate for receiving the upstream connection. • Stormwater – Pre and Post-Construction CCTV Report - To ensure Council's stormwater infrastructure are adequately protected, a pre and post construction CCTV report on the existing pit where stormwater connection is proposed shall be submitted to Council as part of the Works Permit. • New Stormwater Pit and Pipe – The new stormwater pit and pipe on Dudley Street shall be in accordance with CBC Standards and Specifications
Tree Assessment	All assessments have been carried out on the assumption that the submitted information is both accurate and complete. All inspections of the site, trees and vegetation are carried out from the ground and reflect the condition at the time of the inspection. Comments contained in this assessment are in broad terms only. Inspections of trees and other vegetation were limited to a visual inspection only using TreeAZ methodology (Barrell, 2010). Tree protection measures comply with Australian Standard AS4373-2007 Pruning of amenity trees and Australian Standard AS4970-2025 Protection of trees on development sites. The following documentation was reviewed in the course of conducting this assessment report: • Arboricultural Impact Assessment; Date; 25-09-2025; By; Arterra Design Pty Ltd • Trees / Vegetation on Adjoining Properties, Street / Park Trees / Vegetation <u>Recommendation:</u> The consent holder shall ensure full compliance with all the recommendations numbered in Section 4.1, 4.2, 4.3: of the Arborist Report prepared by (Arterra Design Pty Ltd) dated (25-09-2025), which was submitted to Council as part of this application. • Refer to Section 4.1, 4.2, 4.3: Tree Observations and Appendix 4.0: Tree Location Plan (As per Arboricultural Impact Assessment, Date: 25-09-2025) <u>Recommendation</u> Approval of this Development Application should be subject to the following Council conditions:

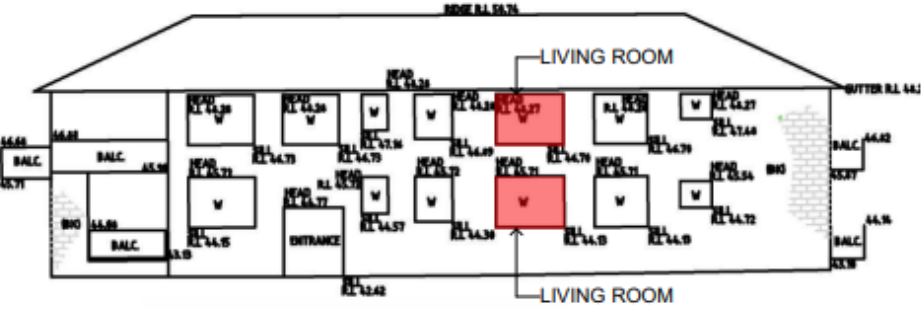


Category	Council Feedback
	Conditions To Be Satisfied Prior to and During Construction The consent holder shall ensure full compliance with all the recommendations numbered in Section 4.1, 4.2, 4.3: of the Arborist Report prepared by (Arterra Design Pty Ltd) dated (25-09-2025), which was submitted to Council as part of this application. Refer to Section 4.1, 4.2, 4.3: Tree Observations and Appendix 4.0: Tree Location Plan (As per Arboricultural Impact Assessment, Date: 25-09-2025)
Resource Recovery/ Waste Management	<u>Recommendation:</u> The following points need to be addressed: 1.1 Widen the central corridor door between the chute room and the waste collection room to 1.5 metres to allow bins to be carted between the two areas.  1.2 Widen the bin carting route from the waste room to the kerb to 1.5 metres to ensure unobstructed movement of bins to the truck for collection. 1.3 Ensure education is used to inform residents that the FOGO bins will be stored in the waste collection room. Consider moving the FOGO bins to the SRS room. 1.4 Widen waste room door on the ground floor for residents to enable the option to upsize bins. 1.5 The waste collection room can be reduced in size as council will collect general waste bins twice per week. This allows the number of 1100L general waste bins to be reduced from 15 to 8, freeing up space.
Town Planning – Development Assessments	1.1 LEP 2023 affords a maximum Height and FSR on this site of 11.5m and 0.9:1. Development proposing affordable housing (as this application does) affords an extra 30% for both standards (i.e.: 14.95m and 1.17:1).



Category	Council Feedback
	Each of the two proposed RFBs are described as having a height of 29.8m with an overall FSR of 2.3:1. A written request to vary these two standards has not been provided. Having regard to s4.38(5) in the Act, it reads: <i>(5) A development application in respect of State significant development that is wholly or partly prohibited may be considered in accordance with Division 3.5 in conjunction with a proposed environmental planning instrument to permit the carrying out of the development. The Planning Secretary may (despite anything to the contrary in section 3.32) undertake the functions of the planning proposal authority under Part 3 for a proposed instrument if it is initiated for the purpose of permitting the carrying out of the development (whether or not it contains other provisions).</i> It is Council's understanding that State Significant Development that is prohibited (fully or partially) under an EPI can be considered if there is a draft EPI that permits that development. However, Council seeks clarification how s4.38(5) allows a flexible approach to compliance with development standards in either the actual or draft LEP. It is also noted that there has not been a draft LEP exhibited to date, only Council's draft Punchbowl Precinct Plan, not a draft planning proposal. Section 4.15(1)(a)(ii) requires DAs consider draft LEPs. <u>Recommendation:</u> prior to the assessment of this application continuing, Council requests: • The plans appear to ignore the height contributed by those structures which exceed the roof level (RL66.00) but which are included in the LEPs definition of building height (e.g.: lifts). The RLs of these structures should be shown on the plans. • That planning advice be obtained to confirm that a written request to vary the standards in LEP 2023 is, or is not, required, including addressing whether a draft EPI has been exhibited. Canterbury Bankstown Development Control Plan 2023 1.2 Subject to s2.10(1)(a) in SEPP (Planning Systems) 2021 the Council's DCP 2023 does not apply. While the DCP numerical controls be considered as part of the development, especially those provisions which apply to day-to-day operations for the development e.g.: waste management. <u>Recommendation:</u> The EIS is revised to include an assessment against Council's DCP controls including all resident, visitor and servicing requirements. Apartment Design Guide (ADG) <u>Setbacks</u> 1.3 The proposal does not meet the required building separation control in 3F in the ADG, specifically the setback from the eastern boundary and there is no environmental planning reason to support this departure.



Category	Council Feedback
	<u>Recommendation:</u> That the following be provided: • Amended plans be provided that comply with 3F; or • Environmental planning reasons be provided to justify the non-compliance. <u>Solar Access to 36 Dudley Street</u> 1.4 To the south of the site is a two storey Residential Flat Building (RFB) at 36 Dudley Street. The SSDA Design Report advises this RFB as two northern elevation living room windows (one on each level for Units 1 and 4) which must each receive at least two hours sunlight between 9am and 3pm in midwinter.  North Elevation of 36 Dudley Street.  Living room windows requiring retained solar access However, Councils records (file 253/36B) show this RFB as having two additional living room windows (relating to units 3 and 6) and which are the two easternmost windows on the northern elevation. <u>Recommendation:</u> • Amended plans be provided that accurately show the living rooms on the RFB at 36 Dudley Street and them receiving adequate solar access in midwinter. <u>Solar Access to western facing dwellings</u> 1.5 The failure for the western facing units to receive two hours sunlight between 9am and 3pm in midwinter is not supported and indicates the design response has not been adequately considered. The applicant's reliance on extending this window from 9am to 4pm is not supported. <u>Recommendation:</u>



Category	Council Feedback
	Amended plans be provided which demonstrate western facing dwelling received adequate solar access between 9am and 3pm.
3D Model (digital)	The applicant is to provide a digital 3D model for assessment and community engagement, in line with Council's 3D Model Submission Manual. https://cb.city/3D-Model-Submission-Manual
Urban Design	The proposed development is generally supported, pending some modifications to improve internal amenity, façade design and landscape outcomes. Ordinarily, this type of development would trigger the Council's Design Excellence requirements under Clause 6.15 of the Canterbury Bankstown Local Environmental Plan 2023 (CBLEP 2023) and would be required to achieve high standards of design quality and amenity that go beyond the base requirements of the Apartment Design Guide. 1. Bulk and scale 1.1 The proposed development exceeds the current FSR and Maximum Height of Buildings controls (0.9:1 and 11.5m), even when accounting for the 30% affordable housing bonus (1.17:1 and 14.95m). Nevertheless, the proposed built form sits comfortably within this emerging urban context envisaged in the Wiley Park and Punchbowl Masterplan, which anticipates FSRs of 2.5:1 and 1.7:1, and building heights of up to 33m and 23m respectively. <u>Recommendation:</u> None. 1.2 While a 1.5 m parapet offset is provided between the two buildings to create a sense of transition and enhance the skyline, it is too subtle to be perceived from pedestrian level and across the sloping grade. In addition, the consistent grid alignment and similar façade proportions visually unify the pair, reducing the effectiveness of the intended solution. <u>Recommendation:</u> Achieve a stronger distinction between the two buildings through deeper material contrast, varied balcony treatments, or differentiated roof termination. 1.3 While the proposed eight storey form, with no defined street wall height, may be supported in this context, the design should break the continuous vertical expression and visually define a mid-level break that respects the desired street wall datum and reduces perceived bulk (the draft DCP controls will be exhibited soon). - See further comments under point 3.1. - Refer to the images below for additional references, including a previous façade design version for this development. <u>Recommendation:</u> The façade strategy should reinforce varied material selection, lighter colours or strategic recesses above the intended street wall height, to clearly express a distinct street-wall datum and achieve a more balanced street interface. These refinements will ensure a stronger built-form response, enhanced



Category	Council Feedback
	residential amenity, and a more cohesive contribution to the evolving character of The Precinct. Key points are detailed below. 1.4 The ‘central spine’ between building A and B, at approximately 4.8 m wide and enclosed by eight-storey walls, is likely to feel constrained and overshadowed, offering limited sky views and wind protection. Given its’ role as a key pedestrian and communal circulation space, it should provide a stronger sense of openness and comfort at ground level. <u>Recommendation:</u> Increase the separation between building A and B to a minimum 6m, and/or introduce upper-level setbacks from level 5 onwards to improve daylight access, sky visibility, and overall human scale. Amenity 2.1 The proposed development does not comply with ADG’s minimum separation distances along the eastern boundary adjoining 149 The Boulevard. Several units (AG01- A701) have balconies located approximately 3.6 m from the boundary, while others (A407 - A707) have living room windows at around 6.3m. This proximity compromises the visual privacy of the development and the future development on the adjoining lot, which is expected to redevelop to a similar height under the Masterplan. <u>Recommendation:</u> The ADG separation distance be achieved as 6m to the boundary for the first 4 stories, and 9m for levels above for habitable rooms. Alternatively, balconies on these units be removed, with non-habitable windows provided where 3m and 4.5m setbacks apply. 2.2 More than 15% of the apartments don’t achieve any solar access on winter solstice between 9am to 3pm, primarily affecting the western facing apartments. Given the project’s Design Excellence requirements, higher levels of solar performance are expected to ensure quality internal amenity. <u>Recommendation:</u> The layout is reconfigured to increase solar access by reducing the number of single-aspect apartments per core and introducing additional dual-aspect or corner units where possible. 2.3 There is an opportunity for Building A to establish direct pedestrian access from The Boulevard, adjacent to the public open space, to strengthen its connection with the street and create a pleasant, welcoming secondary access point. <u>Recommendation:</u> Review the internal layout and consider making adjustments to maintain adequate levels of visual privacy for ground-floor apartments and to clearly delineate the public and private realms. 2.4 The western pedestrian access from The Boulevard provides a direct connection from the street to the communal open space, which is highly supported. However, its angled orientation and proximity to the driveway limit visibility and pedestrian legibility.

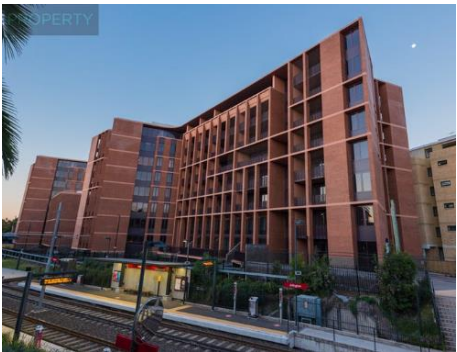


Category	Council Feedback
	<u>Recommendation:</u> The proposal should reconfigure this pathway to run parallel to the adjacent vehicular driveway, ensuring clear sightlines and a stronger visual connection with the street. 2.5 Several apartments (AG01,AG03, A101, A104, A201, A204, A301, A304, A401, A404, A501, A504, A601, A604, A701 and A704) include extended balcony portions of very narrow width that can barely accommodate seating or a small table, limiting their usability and functionality. In addition, some adjoining rooms have no access to these balconies, further limiting their accessibility and genuine usability. <u>Recommendation:</u> The proposal should adjust balcony widths and access points to enhance the overall quality and amenity of private open spaces. 2.6 Unit B104 presents an opportunity to strengthen façade alignment and improve private open-space amenity by extending its balcony southwards to align with the building's southern edge. <u>Recommendation:</u> This adjustment would create a more functional and proportionate outdoor area, enhance daylight penetration, and contribute to a more consistent façade composition along the southern elevation. 2.7 The proposed waste management arrangements require the bins from Building A to be transferred through the main residential corridor at ground level to the collection room in Building B, creating potential conflicts with resident circulation and compromising the amenity of the ground floor spaces on the collection day. <u>Recommendation:</u> The proposal should nominate an alternative route, preferably via the basement levels or a dedicated service corridor at the rear, to avoid conflicts and ensure an adequate level of amenity. Façade design and articulation 3.1 The façades of Building A, along The Boulevard and Dudley Street exhibit excessive vertical and horizontal modulation, resulting in a visually busy yet monotonous expression. The composition lacks variety, material richness, and hierarchy, giving the façade a repetitive, formal appearance. <u>Recommendation:</u> There is an opportunity to simplify the articulation and introduce greater material diversity, depth, and contrast to create visual interest and a more distinctive architectural character that better reflects the desired street identity. These refinements should align with the emerging street-wall height and desired future character (refer to 1.3), ensuring that the lower levels present a human-scale rhythm, and the upper levels are visually lightened through recesses or tonal contrast Refer to the images below for further reference.



Category	Council Feedback
	 Image 1: Previous scheme illustrating different materiality to visually emphasise a clear street wall datum.  



Category	Council Feedback
	Image 2: A recessed level above the street wall with different colours on upper levels to simulate transition.  Image 3: Example of brickwork for texture and depth.  Image 4 and 5: Varied modulation along the façade, with balanced solid-to-void proportions that break up monotony and reduce visual uniformity. 3.2 The distribution of massing to retain the existing spotted gum is highly supported, however, the corner treatment requires further definition and visual strength. The current façade expression continues uniformly around the corner, missing the opportunity to mark this location as a distinct visual anchor. <u>Recommendation:</u> There is an opportunity to visually strengthen the corner through contrasting materials such as brickwork, textured cladding, refined detailing, or vertical architectural element that accentuates the intersection of The Boulevard and Dudley Street. These refinements should create a stronger sense of identity and legibility, helping the corner read as both cohesive with the overall design and distinctive within the street context. 3.3 The proposed arcade element at the main entrance from Dudley Street although introduced to emphasise the entry point, reads as an add-on and lacks proper integration with the building's composition. <u>Recommendation:</u> The proposal should reconsider the entry design so it becomes a natural extension of the façade expression, emphasising entry legibility through proportion, depth, and material continuity rather than applied elements. Landscape 4.1 The proposal does not include information on the existing trees to be retained in the surrounding verge and adjacent sites. <u>Recommendation:</u> The proponent should identify all trees to be retained and clearly show the TPZ and SRZ on all relevant drawings to demonstrate potential impacts of the proposed development and ensure appropriate protection measures are implemented. 4.2 The proposal proposes two <i>Waterhousia floribunda</i> in the garden bed along the south-eastern boundary. Given the narrow width of the garden beds and



Category	Council Feedback
	the presence of the proposed shelter, this constrains the growth of large trees such as the proposed species. <u>Recommendation:</u> the proponent shift the BBQ and shelter further north to increase the garden-bed width to a minimum of 2m, and replace the proposed trees with smaller species such as <i>Elaeocarpus reticulatus</i> 'pink' or <i>Betula pendula</i> 'fastigiata'.
Strategic Assessments	- As part of the State Government's Transport Oriented Development (TOD) program Council prepared the Punchbowl and Wiley Park Precinct Plan which was adopted by Council and submitted to the Department in late 2024. The LEP Amendments proposed in the Council's adopted Plan are under review by the Department.  Map showing the Council adopted Precinct Plan for Punchbowl and Wiley Park – the subject site is marked in red. - Under the Precinct Plan, the site has a maximum height of 12 storeys. The proposal is limited to 8 storeys, well below the maximum height envisaged by Council. - It is noted that the proposal significantly exceeds the current planning controls for the site under the Canterbury Bankstown Local Environmental Plan 2023 and the applicant is relying on the . Council requests that there is greater planning certainty provided by the Department before any determination is issued for this SSDA.
Payment of Section 7.11 or 7.12 Development Contributions	Section 1.3 (p14) of the Canterbury Bankstown Local Infrastructure Contributions Plan 2022 notes that the following development is excluded from the Plan: <i>Affordable housing carried out by or on behalf of a registered social housing provider, provided that:</i>



Category	Council Feedback
	– the affordable housing is managed by a registered social housing provider; – the total residential gross floor area exempted is used solely for the purpose of the provision of affordable housing in perpetuity; and – a covenant is registered in the title of the site prior to the issuance of the Occupation Certificate, with wording shown in the box below. Council seeks written confirmation from the applicant whether the SSD application would be excluded from the payment of Section 7.11/12 Development Contributions in accordance with the above.
Payment of fee – Post Consent Compliance	If this SSD is approved, there may be conditions of the consent that may require Council's review and/or approval of documents before the construction and/or occupation of the development can occur. In accordance with Council's adopted Fees and Charges, a fee of \$1,375.00 (excl. GST) is required to be paid by the applicant to Canterbury Bankstown Council prior to submitting any information to Council as required by the SSD development consent conditions.