Environmental Impact Statement

Mixed-Use Development with In-Fill Affordable Housing

2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield

Submitted to the Department of Planning, Housing and Infrastructure
on behalf of Convertia Pty Ltd

SSD-80432461

Prepared by Ethos Urban, a Colliers Company.

12 June 2025 | 2240053

'Gura Bulga'
Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

'Dagura Buumarri'
Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.

'Gadalung Djarri'
Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

In March 2025, Ethos Urban took a major step toward future growth by partnering with leading professional services firm, Colliers. While our name evolves, our commitment to delivering high-quality solutions remains unchanged—now strengthened by broader access to property and advisory services and expertise.

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Appendix		Author
FF.	**Electrolysis & Stray Traction Current Report**	*ANACivil*
GG.	**Community Housing Agreement**	*Strathfield Partners*
Under Separate Cover		
EDC Report		*QPC & C*
Landowners Consent		*Convertia Pty Ltd*

Signed Declaration

Project Details		
Project Name	11-13 Albert Road and 2-6 Pilgrim Avenue, Strathfield Mixed Use Commercial & Residential Development including Infill Affordable Housing	
Application Number	SSD-80432461	
Land to be Developed	2-6 Pilgrim Avenue, 11-13 Albert Road, Strathfield identified as: • Lot 2 DP 862623 • SP8785 • Lot 9 DP15917 • Lot 8 DP15917 • Lot A DP100558 • Lot B DP100558	
Applicant Details		
Applicant Name	Convertia Pty Ltd	
Applicant Address	Suite 401, 16 Railway Parade, Burwood NSW 2134	
Prepared by		
Name	Lachlan Jones	Tegan Flannery
Qualifications	BPlan (Hons)	BDevStud, MPlan
Address	Level 4, 180 George Street, Sydney NSW 2000	
Declaration		
Name	Christopher Curtis	
Qualifications	BUrbanEnvPlan (Hons), DipPM, RPIA (REAP)	
Registration Number	11063	
Registration Organisation	Planning Institute of Australia	
	The undersigned declares that this EIS: • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines – Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.	
Signature		
Date	12 June 2025	

Summary

Overview

This Environmental Impact Statement (EIS) has been prepared on behalf of Convertia Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) (SSD-80432461) for a proposed mixed use development with in-fill affordable housing (the Proposal) located on land at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield (the Site).

The Proposal is for the purposes of residential development including in-fill affordable housing within the Greater Sydney Region with an Estimated Development Cost (EDC) of more than $75 million. Therefore, in accordance with Schedule 1, Section 26A of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), it is declared to be State Significant Development (SSD) for the purposes of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

A Planning Proposal (PP-2020-178) was gazetted for the Site in July 2020 which included amendments to the Height of Building (HOB) and Floor Space Ratio (FSR) development standards under the *Strathfield Local Environmental Plan 2012* (Strathfield LEP 2012) and the preparation of a site-specific Development Control Plan (DCP). A Development Application was subsequently lodged with Strathfield Council on 6 January 2021 (DA 2020/256) for a part 11- and part 15-storey mixed-use development comprising 168 dwellings and two (2) ground floor commercial spaces and four (4) basement levels, as well as ancillary works. It was approved (subject to deferred commencement) by the Sydney Eastern City Planning Panel (PPSSEC-112) on 30 September 2021.

The New South Wales (NSW) Government has since established a fundamental policy objective of delivering more housing in accessible locations in response to the current housing affordability crisis. The policy has introduced an in-fill affordable housing incentives that supports a HOB and FSR bonus of 20-30% for development that includes 10-15% affordable housing and located in an accessible area. The policy includes an SSD pathway for projects with an EDC of $75 million in Greater Sydney to expedite assessments and promote the delivery of affordable and market housing.

The Proposal aligns with the policy, delivering a 15.35% affordable housing contribution through the provision of 35 affordable housing dwellings from a total of 228 dwellings as part of a mixed use development including two (2) commercial units at the ground level and two (2) 20-storey towers at the ground level. The Site is located approximately 200m to the west of Strathfield Station, includes six (6) allotments and a total site area of 3,361.90m^2. The Site and its surrounding context are illustrated in the Site Aerial Context Map provided below.

Site Aerial Context Map

Source: Nearmap, edits by Ethos Urban

Analysis of Alternatives

Feasible alternative options for the Site were explored through the design development process for the Proposal and not considered appropriate. This included the following:

- **Do Nothing** – The 'do nothing' scenario would involve taking no further action and allowing the original approved plans (DA-10.2020.256.1) to lapse leaving the existing buildings to remain untouched. The current Site is underutilised for its location being near the Strathfield Town Centre which is a strategic gateway location to greater Sydney. This would not support the NSW Governments key objective of building diverse housing in well located areas to respond to Sydney's housing crisis.
- **Use of the Site for an Alternative Purpose** – The use of the Site for an alternative purpose would be inappropriate in the circumstances given the ability to provide new housing in close proximity to Strathfield Station and respond to the NSW Government's affordable housing policy.
- **Alternative Design** – Alternative designs have been considered and determined to result in inferior built form and amenity outcomes. From the SDRP Meeting 1 on 20 November 2024, the Government Architect strongly supported the Proposals orientation and massing, inclusion of affordable housing, solar access, ample communal space and integrated landscaping. Further, a scheme that does not does not utilise the NSW Government's affordable housing policy bonuses would fail to provide additional dwelling including 35 affordable dwellings, while achieving a comparable level of amenity.

It was therefore determined that the feasible alternatives for the Site do not represent the highest and best use nor the best overall outcome when compared against the Proposal, which is detailed in the following section.

Proposal

The Proposal seeks development consent for site preparation works and erection of a mixed-use development including two (2) 20-storey towers and podium comprising a total of 228 dwellings (including 35 affordable dwellings) and two (2) commercial tenancies on the ground floor.

Specifically, the Proposal is described as including the following:

- 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 1,600m^2 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.

The Proposal will be undertaken in accordance with the Architectural Drawings prepared by Kennedy Associates Architects included at **Appendix B**. It is depicted in the perspective visualisations provided on the following page.

Perspective Visualisation of the Proposal from Albert Road to the South-West

Source: Kennedy Associates Architects

Perspective Visualisation of the Proposal from the Rail Corridor to the North-East

Source: Kennedy Associates Architects

Stakeholder Engagement

Engagement with identified stakeholders has been undertaken by the Applicant, Ethos Urban, and The Social Aspect. The engagement carried out included the following stakeholders:

- Adjoining landowners and surrounding community;
- Government and agencies, including the Department of Planning, Housing and Infrastructure (DPHI), Transport for NSW (TfNSW), Water NSW, Department of Climate Change, Energy, the Environment and Water (DCCEEW) and Sydney Trains; and
- Aboriginal groups, including the Metropolitan Local Aboriginal Land Council.

The stakeholder engagement has help informed the Proposal and is discussed in further detail in **Section 5.0**.

Environmental Impacts and Mitigation Measures

The EIS provides an assessment of the environmental impacts of the Proposal in accordance with the Planning Secretary's Environmental Assessment Requirements (SEARs) dated 28 February 2025 (refer to **Appendix A**). It also outlines the undertakings made by the Applicant to manage and minimise potential impacts arising from the Proposal. The key potential environmental impacts of the Proposal assessed by the EIS include:

- Design Quality;
- Built Form and Urban Design;
- Environmental Amenity;
- Visual Impact;
- Traffic, Transport and Accessibility;
- Noise and Vibration;
- Water Management;
- Contamination and Remediation;
- Trees and Landscaping;

A complete assessment of each issue identified within the SEARs is provided in **Section 6.0**. A consolidation of mitigation measures proposed by the Applicant is provided at **Appendix E**.

Conclusion and Justification

Having regard to environmental, economic, and social considerations, the carrying out of the Proposal is justified for the following reasons:

- It is permissible with consent and is consistent with the objectives of the MU1 Mixed Use zone under the Strathfield LEP 2012;
- It meets the relevant statutory requirements of the relevant Environmental Planning Instruments including the Strathfield LEP 2012, with exception of the proposed exceedance to the FSR development standard due to the requirement for wintergardens which is justified and supported by a Clause 4.6 Variation;
- It will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- It is a direct response to the NSW Government's affordable housing policy and need for more dwellings that are well located, delivering 35 affordable units and 193 market units, which will contribute to local, State and national housing targets;
- It will provide a diverse supply of dwellings, ranging from one (1) bedroom to three (3) bedroom apartments to meet the housing and social needs of future residents;
- It provides a high-quality architectural and landscape design that offers a range of housing types, communal facilities, and gathering spaces that will contribute to a safe, secure and active environment;
- It provides a high standard of residential amenity for all residents within the Site that is consistent with the objectives of the Apartment Design Guide (ADG), as well as protecting the visual privacy, overshadowing, and solar amenity of surrounding residential properties; and
- It is suitable for the Site and in the public interest.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of Convertia Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) (SSD-80432461) for a proposed mixed use development with in-fill affordable housing (the Proposal) located on land at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield (the Site).

The Proposal is for the purposes of residential development including in-fill affordable housing within the Greater Sydney Region with an Estimated Development Cost (EDC) of more than $75 million. Therefore, in accordance with Schedule 1, Section 26A of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), it is declared to be State Significant Development (SSD) for the purposes of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

A request for the issue of industry-specific Secretary's Environmental Assessment Requirements (SEARs) for housing was submitted to the New South Wales (NSW) Department of Planning, Housing and Infrastructure by the Applicant. Subsequently, SEARs for SSD-80432461 were issued on 28 February 2025 which replaced the industry specific SEARs for infill affordable housing issued previously on 6 September 2024.

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Clause 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), and the SEARs. A SEARs Compliance Table is provided at **Appendix A** that identifies where the SEARs have been addressed in this EIS.

This EIS should be read in conjunction with the supporting documentation (see **Appendices**) and is based on the Architectural Drawings prepared by Kennedy Associates Architects included at **Appendix B**. The EIS intends to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts, mitigation measures and benefits, as well as providing an environmental assessment of the Proposal.

1.1 The Applicant

The Applicant's details are presented in **Table 1** below.

Table 1 Applicant Details

Applicant:	Convertia Pty Ltd
Address:	Suite 401, 16 Railway Parade, Burwood NSW 2134
ABN:	88 164 327 717

1.2 Overview of Proposed Development

The Proposal seeks development consent for site preparation works and erection of a mixed-use development including two (2) 20-storey towers and podium comprising a total of 228 dwellings (including 35 affordable dwellings) and two (2) commercial tenancies on the ground floor. Basement car parking, extension and augmentation of services, and landscaping is also proposed. This EIS provides further description of the Proposal in **Section 3.0**. The Proposal will be undertaken in accordance with the Architectural Drawings prepared by Kennedy Associates Architects included at **Appendix B**.

1.3 Objectives of the Development

The principal objective of the Proposal is to deliver well-located and diverse housing in response to the well-publicised housing affordability crisis and shortage of appropriate and affordable housing options. Specifically, the key objectives of the Proposal are to:

- Provide much-needed affordable housing in Strathfield and directly contribute to the local, State and Federal housing targets under the National Housing Accord 2022;
- Rejuvenate underutilised land for new market and affordable housing in a key location close to Strathfield Station within the Town Centre;
- Create a high-quality, contemporary, activated building for living opportunities that has access to a range of landscape amenities, public amenities, entertainment and dining opportunities;
- Deliver an innovative, responsible and sustainable development outcome by providing a development of quality and aspiration in the sustainability space;

- Provide a diverse residential supply and community in Strathfield Town Centre that offers a range of housing types, dwelling types, communal facilities, and gathering spaces; and
- Complement and engage with the varied scale of development in the locality and distinct neighbourhood and character of Strathfield.

1.4 Background

1.4.1 Planning Proposal (PP-2020-178)

A site-specific Planning Proposal (PP-2020-178) relating to the Site was formally endorsed by Strathfield Council (Council) on 5 May 2020 and subsequently gazetted on 17 July 2020. It comprised the following amendments to the *Strathfield Local Environmental Plan 2012* (Strathfield LEP 2012):

- Amend the maximum Height of Buildings (HOB) from 35m to 54m; and
- Amend the maximum Floor Space Ratio from 3.5:1 to 5:1.

The Planning Proposal took a whole-of-block approach and related to land bounded by Raw Square to the east, Albert Road to the south and Pilgrim Avenue to the west. It was accompanied by a site-specific Development Control Plan (DCP) which was endorsed by Council on 6 May 2020 and came into force on 21 July 2020 as *'DCP 26 – 2-6 Pilgrim Avenue and 9-13 Albert Road, Strathfield*'.

The site-specific DCP established detailed urban design considerations for any future development including the provision of public access, built form, boundary setbacks, deep soil areas, tree retention, vehicular access, and residential character of Pilgrim Avenue.

1.4.2 Development Application (DA 2020/256)

A Development Application (DA 2020/256) was lodged with Strathfield Council on 6 January 2021 for a part 11- and part 15-storey mixed-use development on the Site. Specifically, the DA sought approval for:

- Site preparation works, including demolition of existing structures, removal of six (6) trees, and bulk excavation;
- Construction of a part 11-, part 13-storey mixed use development including:
  - 172 dwellings;
  - 3 ground floor commercial tenancies; and
  - 4 basement levels comprising 235 car parking spaces.
- Landscaping works for communal open space;
- Vehicular access from Pilgrim Avenue; and
- Augmentation of infrastructure and services as required.

The Development Application was approved (subject to deferred commencement) by the Sydney Eastern City Planning Panel (PPSSEC-112) on 30 September 2021. The approved development is depicted on the perspective massing views presented in **Figure 1** below.

View from Albert Road from South-West

View from the corner from Raw Square to the South-East

Figure 1 Perspective Massing of the Approved Development (DA 2020/256)

Source: Kennedy Associates Architects

1.4.3 Affordable Housing

'Affordable Housing' in NSW is available to very low to moderate income households with rent capped so that households can meet other basic living costs. In response to the current housing affordability crisis, the NSW Government has established an in-fill affordable housing policy that supports a HOB and FSR bonus of 20-30% for development located in accessible areas and includes 10-15% affordable housing. To fast track the delivery of affordable housing, the NSW Government introduced an SSD planning pathway for projects with an EDC of $75 million, under which this application has been lodged.

The Proposal aligns with the policy, delivering a 15.35% affordable housing contribution through the provision of 35 affordable housing dwellings within the total of 228 dwellings. In accordance with Chapter 2, Part 2, Division 1 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP), the Proposal is eligible and utilises a 30% HOB and FSR bonus above the existing planning controls for the Site. The affordable housing dwellings will be managed by Strathfield Partners, a registered Community Housing Provider (CHP) (refer to Appendix GG), for a period of at least 15 years.

2.0 Strategic Context

This section identifies key strategic matters relevant to the assessment of the Proposal, including the Site's features, context, strategic context and other development in the surrounding area. It also provides an analysis of feasible alternatives that were considered in light of the objectives of the Proposal.

2.1 Site Location and Context

The Site is located within the Strathfield LGA in the western portion of the Strathfield Town Centre. The rectangular shaped block is bound by Raw Square to the east, Albert Road to the south, Pilgrim Avenue to the west, and rail corridor to the north. It is located approximately 10.5km west of the Sydney Central Business District (CBD) and situated close to the boundary of the Strathfield LGA and the LGAs of Canada Bay located to the north and Burwood Council located to the west.

Directly adjoining the Site to the north is the railway corridor, with Strathfield Station located approximately 200m to the east. It is also situated near to the M4 Motorway and Parramatta Road, approximately 500m to the north of the Site. The local surrounding context is characterised by predominantly mid-rise residential flat buildings as well as grand low-density residential development, whilst development further to the east around Strathfield Station is characterised by high rise residential development. Land to the north of the railway corridor has been rezoned under the Accelerated Precincts Transport Orientated Development Program which will allow mid and high-rise developments in the Homebush precinct for Strathfield and Canada Bay LGAs as shown in **Figure 3** on the following page.

A Site Location and Context Map depicting the location and immediate surrounding context of the Site is provided in **Figure 2** below.

Figure 2 Site Location and Context Map

Source: Kennedy Associates Architects

Figure 3 Homebush Transport Oriented Development Precinct Map

Source: Department of Planning, Housing and Infrastructure, edits by Ethos Urban

2.2 Key Features of Site and Surrounds

2.2.1 Site Description

The Site is identified as 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield and comprises six (6) allotments with a total area of 3,361.90m^2. It is irregular in shape including approximate frontages of 95m to Pilgrim Avenue to the west, 40m to Albert Road to the south, 45m to the rail corridor to the north, and 83m to an adjoining Shell Service Station to the east.

The entirety of the Site is under single ownership. It is noted Lot 2 DP 862623 forms part of the street reserve (also under the single ownership) and a site area of 2,868.8m^2 has therefore been adopted for the purposes of development yield calculations. A Survey Plan prepared by W. Buxton Pty Ltd is included at **Appendix G** and provides full details of the Site.

The Site is described in **Table 2** below and illustrated in the Site Aerial Map in **Figure 4** following.

Table 2 Site Description

Ref.	Street address	Legal description	Area
1	2 Pilgrim Avenue	SP8785	500 m^2
2	4 Pilgrim Avenue	Lot 9 DP 15917	472 m^2
3	6 Pilgrim Avenue	Lot 8 DP 15917	433 m^2
4	13 Albert Road	Lot A DP 100558	748 m^2
5	11 Albert Road	Lot B DP 100558	715 m^2
6	-	Lot 2 DP 862623	493.9m^2

Figure 4 Site Aerial Map

Source: Nearmap, edits by Ethos Urban

2.2.2 Existing Development

The Site is currently used for residential purposes only. The site at 2 Pilgrim Avenue comprises a two-storey unit building with a driveway off Pilgrim Avenue to a rear at-grade parking area. The sites at 4-6 Pilgrim Avenue (Ref 2-3) contains detached single storey brick residential dwellings each with their own driveways off Pilgrim Avenue, with associated landscaping and outbuildings . The sites at 11-13 Albert Road (Ref 4-5) comprise detached single storey brick residential dwellings, with associated landscaping and outbuildings and each with their own driveways off Pilgrim Avenue.

The Site also includes the street reserve strip along the Pilgrim Road frontage (Ref 6) that comprises a width of approximately 5m and includes two (2) trees and a footpath. During the assessment of Development Application No. DA 2020/256 a portion of the site running along Pilgrim Avenue owned by TfNSW was purchased by the current owner to enable access into the Site. This land can be seen in the Survey Plan outlined in **Appendix G.**

The existing development of the Site is depicted in the site photographs provided in **Figure 5** below, and the aerial view from the west presented in **Figure 6** on the following page.

View of 2-4 Pilgrim Avenue looking east

View of the rear of 13 Albert Road looking east

View of 11 Albert Road from Raw Square looking west

View of 11-13 Albert Road looking north

Figure 5 Site Photographs

Source: Ethos Urban

Figure 6 Aerial View of the Existing Development from the West

Source: Nearmap, edits by Ethos Urban

2.2.3 Site Characteristics

The key characteristics and environmental features of the Site are identified and described in **Table 3** below.

Table 3 Site Characteristics

Characteristic	Description
Topography	The topography of the Site is generally flat with slight fall of approximately 1.5m from the south-west to the north-east corner of the Site.
Easements	The Site includes a 3.96m wide right of carriageway easement to support access on 11-13 Albert Road.
Geotechnical	The Soil Conservation Service of NSW Sydney 1:100,000 Soil Landscapes Series Sheet 9130 (1st Edition) indicates that the landscape at the Site likely comprises Disturbed Terrain. This landscape type typically included level plain to hummocky terrain extensively disturbed by human activity, with soil, rock, building and waste materials. Soils are generally turfed fill areas commonly capped with up to 0.4m of sandy loam or up to 0.6m pf compacted clay over fill or waste materials. These soils, depending on the nature of fill, present mass movement hazards, unconsolidated low wet strength materials, impermeable soil, poor drainage and toxic chemicals. For further discussion, refer to **Section 6.8**.
Vegetation	An Arboricultural Impact Assessment has been undertaken by Birds Tree Consultancy and included at **Appendix V.** It assesses a total of forty (40) trees located on the Site and on land directly adjoining the Site. It determines that a total of two (2) trees have 'high' retention value, twenty-two (22) trees have 'medium' retention value, and sixteen (16) have 'low' retention value. For further discussion, refer to **Section 6.10** below**.**
Flooding	According to Powells Creek flood study conducted by Strathfield Council, the Site is affected by overland flooding during a 1% Annual Exceedance Probability (AEP) event. For further discussion, refer to **Section 6.15**.
Aboriginal Cultural Heritage	The Site is located within 120m of a first order tributary and thus Aboriginal occupation of the area is likely to have been only transitory. A search of the Aboriginal Heritage Information Management System (AHIMS) database has identified no registered sites or objects within 1km

Characteristic	Description
	of the Site. The development on the Site in the 20th century has significantly disturbed the Site and is considered as having nil-low archaeological potential for evidence of Aboriginal occupation. For further discussion, refer to **Section 6.17**.
Environmental Heritage	The Site does not contain any local or State heritage items. The surrounding area comprises a number of places, buildings or items of local and/or State heritage significance as identified in **Table 4** below and illustrated in **Figure 7** following. For further discussion, refer to **Section 6.18**.

Table 4 Summary of Surrounding Heritage Items and Conservation Areas

Item	Item Name	Address	LGA	Significance
Heritage Items				
I95	"Wairuna"—Victorian Italianate style house	11–13 Beresford Road	Strathfield	Local
I199	Strathfield Railway Station	Strathfield Square	Strathfield	State
I139	"Verani"—Victorian villa	24 Homebush Road	Strathfield	Local
I143	St Anne's Anglican Church—church, school hall and rectory	36–42 Homebush Road	Strathfield	Local
I1342	Street Trees	Manson Road	Canada Bay	Local
I335	House	10 Manson Road	Canada Bay	Local
I284	House	5 Leicester Avenue	Canada Bay	Local
I426	House	19 Swan Avenue	Canada Bay	Local
I427	House	20 Swan Avenue	Canada Bay	Local
I548	Inter-War Flats	41 Everton Road	Canada Bay	Local
Heritage Conservation Areas				
C10	Churchill Avenue Conservation Area, Federation houses group	-	Strathfield	Local
C11	Homebush Road Conservation Area	-	Strathfield	Local

Source: Spatial Viewer

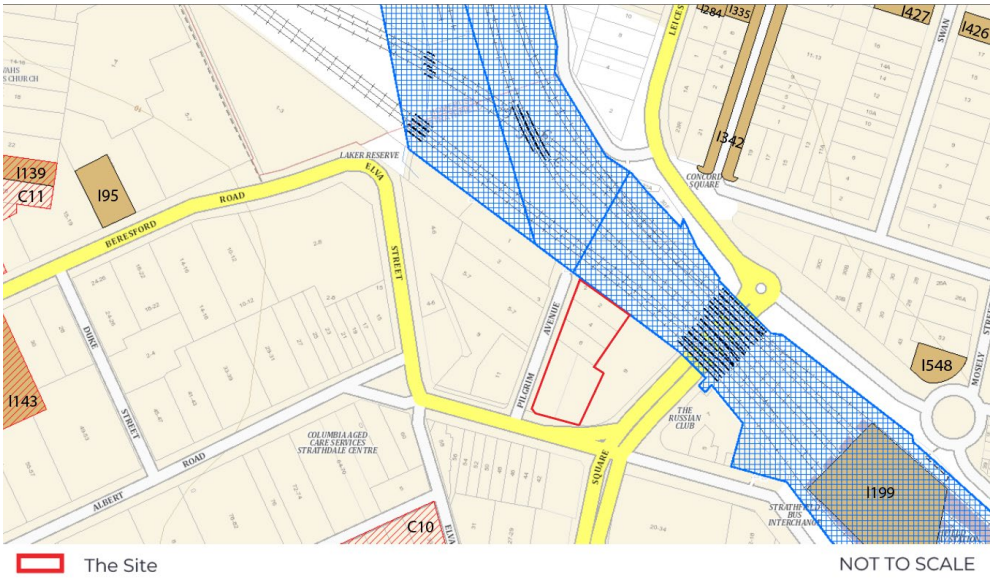


Figure 7 Heritage Map

Source: NSW Planning Portal Spatial Viewer, edits by Ethos Urban

Public Transport and Access	The Site is well-serviced by public transport, with frequent rail services available from the nearby Strathfield Station approximately 200m east of the Site, and bus services surrounding in the surrounding area.

Characteristic	Description
	Strathfield Station provides access to several major rail lines operated by Sydney Trains, including the T1 North Shore & Western Line, T2 Leppington & Inner West Line, T3 Liverpool & Inner West Line, T9 Northern Line and regional services. The closest bus stop to the Site is located along Albert Road that is serviced by multiple bus routes, including Routes 407, 408, 480 and 483. Further, Strathfield Station includes a bus interchange that is served by nine (9) routes.

2.2.4 Surrounding Context and Development

The surrounding context and development is characterised by a mix of low-rise retail and residential, a commercial tower, and high-rise residential flat buildings from a variety of different periods and architectural styles. The area has begun to transition away from being an area dominated by low-density residential and retail development to an area with a diverse building typology and built form.

North

The Site overlooks the rail corridor to the north with additional residential areas within the Canada Bay LGA located beyond. To the north-east generally comprises single-storey detached dwellings, with development to the immediate north including medium and high-density residential development along Parramatta Road up to approximately 10-storeys. To the north-west is a light industrial and warehouse precinct. Photographs of the surrounding development to the north are provided in **Figure 8** below.

View of the rail corrior from Pilgrim Avenue to the north

View of the rail corridor overpass at Raw Square to the north

Figure 8 Surrounding Development to the North

Source: Ethos Urban

East

Immediately to the east of the Site is a Shell Service Station, which formed part of the land and broader site subject to the Planning Proposal (PP-2020-178) (refer to **Section 1.4.1**). Further to the east is the Sandalwood Apartments residential tower (approximately 18-storeys), and the Regal Court mixed use development (approximately 18-storeys) located to the site's south-east with smaller ground level retail shops and residential above.

Strathfield Station is located approximately 200m to the west of the Site. It is a key interchange on the Sydney Trains rail network with a number of key rail services stopping at the station including the T1 North Shore & Western Line, T2 Leppington & Inner West Line, T3 Liverpool & Inner West Line, T9 Northern Line and regional services. Photographs of the surrounding development to the east are provided in **Figure 9** below.

View of Sandalwood Apartments from the corner of Raw Square and Albert Road to the east

View of Regal Court Apartments from the corner of Raw Square and Albert Road to the south-east

View of Shell Service Station from the corner of Raw Square and Albert Road to the east

Figure 9 Surrounding Development to the East

Source: Ethos Urban

South

To the immediate south of the Site across Albert Road is the JJ Apartments mixed use development (approximately 11-storeys) at 38 Albert Road and a series of single-storey detached residential dwellings. Further to the south-east is the Strathfield Plaza shopping complex and a mix of commercial and residential buildings. Photographs of the surrounding development to the south are provided in **Figure 10** below.

View of the JJ Apartments on Albert Road to the south

View of a Semi-Detatched Dwelling to the south

Figure 10 Surrounding Development to the South

Source: Ethos Urban

West

To the immediate west of the Site across Pilgrim Avenue are a number of 1970s style residential flat buildings that vary between two to four-storeys in height. The taller residential unit blocks generally front Elva Street and overlook the rail corridor. Further to the west, the height of the residential flat buildings along Elva Street, such as Strathbelle Apartments, increases to approximately 10-storeys. Photographs of the surrounding development to the west are provided in **Figure 11** below.

View of adjacent residential development along Pilgrim Avenue to the immediate south

View of the 'Strathbelle' apartments on Beresford Road further to the west

Figure 11 Surrounding Development to the West

Source: Google Maps, Ethos Urban

2.3 Strategic Planning Context

The Proposal's consistency with the relevant Government plans, policies and guidelines applying to the Site is analysed and demonstrated in **Table 5** below.

Table 5 Summary of Strategic Context

Plan / Strategy	Context
Greater Sydney Region Plan – A Metropolis of Three Cities	The *Greater Sydney Region Plan – A Metropolis of Three Cities* (Region Plan) (Greater Sydney Commission, 2018) is the overarching strategic plan to manage change and growth in the Greater Sydney Region. It sets a 40-year vision where most residents live within 30-minutes of their jobs, education and health facilities, services and great places. The Proposal is consistent with the policy directions and objections under the Region Plan, as based on the following: • **A City Supported by Infrastructure** – The Proposal will assist in the delivery of homes in proximity to existing major transport infrastructure, including the Strathfield Station which represent a major interchange on the Sydney Trains and regional trains network. • **A City for People** – The Proposal has been designed in consideration of intergenerational equity and promotes sustainability, universal design and accessibility, and community integration. The delivery of a built form with increased amenity will enhance the way people engage with the entire development. • **A City of Great Places** – The Proposal will provide new mixed-use space in a gateway location in Sydney. This will ensure future site-users are in immediate proximity to a variety of services and social infrastructure, open space and transport. The proposed building also provides high quality design and delivers an activated mixed-use precinct and a large amount of high-quality public space. • **A Well-Connected City** – The Proposal will provide a mix of commercial and residential uses in proximity to Strathfield station. In this regard, it will help align land use planning and infrastructure planning, improving access to jobs in the Sydney and Parramatta CBDs. This will take advantage of the substantial investment in public transport infrastructure and support the achievement of the '30-minute city'. • **Jobs and Skills for the City** – Delivery of additional commercial floorspace will contribute to increased economic activity in the local area, supporting economic growth and job creation. • **A City in its Landscape** – The Proposal incorporates high quality landscaping across the ground plane and podium, as well as in the various open spaces and public domain. • **A Resilient City** – The Proposal minimises exposure to natural hazards by ensuring it responds to overall climate adaption and resilience. The environmental initiatives implemented through the development contribute to enhanced environmental outcomes and seek to mitigate impacts related to climate change.
Our Greater Sydney 2056 – Eastern City District Plan	The *Our Greater Sydney 2056 – Eastern City District Plan* (District Plan) (Greater Sydney Commission, 2018) underpins the Region Plan and sets the 20-year vision for the District through 'Planning Priorities' that are linked to the Region Plan. The Proposal is consistent with a number of the priorities of the District Plan, as follows: • **Infrastructure and Collaboration** – The '30-minute city' model is a long-term aspiration for Sydney whereby jobs, services and strategic/metropolitan centres are accessible within 30 minutes by public transport. This development is uniquely placed to contribute to the '30-minute city' model, by providing a mix of commercial and residential uses near to major transport infrastructure. In this regard, it will help align land use planning and infrastructure planning, by providing new well-located housing with strong transport links to jobs. • **Productivity** – The delivery of additional commercial and residential floorspace will directly contribute to the long-term strength and productivity of the local economy by attracting quality homes servicing local businesses. • **Sustainability** – The Proposal will reduce baseload energy consumption, support the use of sustainable transport options, improve the efficient use and reuse of water, and minimise waste. This will be achieved through the integration of sustainability initiatives that ensure superior environmental performance and achieve sustainability targets.
Future Transport Strategy	The *Future Transport Strategy* sets out a 40-year vision, directions and outcomes framework for moving people in NSW and will guide transport investment over the longer term. It was refreshed in 2022 to take into account the COVID-19 pandemic, drought, bushfires, floods, alongside population growth and global megatrends. It includes a new focus on the six cities region, striving to revitalise and connect communities, encourage thriving local neighbourhoods, and build on economic success.

Plan / Strategy	Context
	The Proposal is consistent with the Strategy by delivering increased residential accommodation within a highly accessible location approximately 10.5km west of the Sydney CBD, with excellent access to transport, jobs, education, and health services.
Better Placed	The objectives and design principles of Better Placed have been considered and responded to in the proposed design. The document seeks to promote good design and capture our collective aspiration and expectations for the places where we work, live and play. Better Placed includes seven (7) objectives for good design, which has been considered in the preparation of the Proposal as follows: • **Objective 1: Better Fit – contextual, local and of its place** - The Proposal responds to the surrounding context and its location within the Strathfield Town Centre by seeking to deliver a mixed use development with ground level activation and public domain elements. It will facilitate additional housing supply including a 15.35% contribution of affordable housing, while also enhancing the sense of continuity into the recently established Homebush Transit-Oriented Development (TOD) Precinct and the broader Strathfield Town Centre. It will be supported by landscape elements that have also been integrated into the design to improve the amenity afforded to residents, workers and visitors of the development and the broader precinct. • **Objective 2: Better Performance – sustainable, adaptable, and durable** - The design team have ensured that the principles of ecologically sustainable development (ESD) have been incorporated into the Proposal through the adoption of effective and environmentally responsive design initiatives. The target goals for the Proposal include an exceedance of BASIX energy, water and thermal comfort targets, an average 7 Star NatHERS rating and WELL for Residential certification, alongside an all-electric design to target net zero and the integration of low impact materials and minimisation of resources to reduce embodied carbon emission. Further discussion, refer to **Section 6.11**. • **Objective 3: Better for Community – inclusive, connected and diverse** - Through the incorporation of public domain elements, the Proposal improves permeability through the Site. Additionally, it will incorporate measures to ensure that it is accessible and inclusive to all community groups. This is confirmed in the Access Statement of Compliance prepared by Accessible Building Solutions included at **Appendix N**. • **Objective 4: Better for People – safe, comfortable and liveable** - The Proposal has been designed to ensure private and communal open space and amenity spaces are secure and safe. It will improve visual links between the built form and the streetscape, while also activating the ground floor by providing activated uses at the ground plane, along with public domain elements. This will maximise the passive surveillance to public and private areas. • **Objective 5: Better Working – functional, efficient and fit for purpose** - The Proposal involves the redevelopment of an unutilised site for the highest and best use, providing a significant contribution of new market and affordable dwellings to the local area. The provision of residential accommodation will revitalise the Site, while also assisting with alleviating the housing affordability crisis. • **Objective 6: Better Value – creating and adding value** - The Proposal creates and adds value to the Site by proposing uses that make better use of the Site and align with the demands of the local and extended community. It includes high-quality public, communal, and private open space for residents and visitors into the future. New commercial premises will activate the streetscape and expand the offerings within Strathfield Town Centre and provide new permanent employment and commercial opportunities. • **Objective 7: Better Look and Feel – engaging, inviting and attractive** - The design principles have informed the Proposal as outlined in the Design Report prepared by Kennedy Associate Architects included at **Appendix K**.
Strathfield 2040 Local Strategic Planning Statement	The *Strathfield 2040 Local Strategic Planning Statement* (Strathfield LSPS) gives effect to the District Plan that identifies a series of actions that will provide homes, jobs and related infrastructure to support future growth. It is also informed by other State and Regional strategies. The Proposal is consistent with several of the priorities of the District Plan, as follows: • **Infrastructure and Collaboration** – The proposed mixed-use development supports the infrastructure and collaboration objectives outlined in Strathfield LSPS. The continued

Plan / Strategy	Context
	investment in city shaping infrastructure in the region supports new housing developments in the local area. • **Liveability** – Maintaining and improving liveability requires housing, infrastructure and services that meet people's needs, and the provision of a range of housing types in the right locations with measures to improve affordability. The Proposal seeks to deliver improved amenity for future residents and workers in a location well-serviced by transport and services. It also includes a 15.35% affordable housing contribution to support housing for very low to moderate income households in the local area. • **Productivity** – Productivity will be achieved by driving opportunities for investment, business and jobs growth; supporting economic diversity; supporting internationally competitive industry sectors; and rebalancing the region's eastern economic focus so that all three cities benefit from growth. The proposed ground floor commercial premises will support the goals of business and job growth in Strathfield Town Centre, creating additional activation in the local area. • **Sustainability** – Improving sustainability will involve incorporating natural landscape features into the urban environment; protecting and managing natural systems; cooling the urban environment; innovative and efficient use and re-use of energy, water and waste resources; and building the resilience of communities to natural and urban hazards, shocks and stresses. The proposed design has included a considered sustainability approach, as outlined in the Ecologically Sustainable Development Report prepared by Efficient Living and included at **Appendix W**.

2.4 Cumulative Impacts

The relevant projects surrounding the Site that have the potential to result in cumulative impacts are identified in **Table 6** below.

Table 6 Surrounding Future Development

Development	Description	Status
Mixed-Use Residential 2 Leicester Avenue, Strathfield DA 2020/0269	Demolition of existing structures and construction of a mixed-use building comprising part 10, part 17 and part 18-storey building with 201 residential apartments, ground floor retail tenancy and 221 car parking spaces.	Approved – 20/10/2021
Boarding House 15 Cooper Street, Strathfield DA 2021/0260	Demolition of existing dwelling houses, Consolidation of two lots and proposed new boarding house with 29 rooms and a mangers room.	Approved – 22/07/2022
Boarding House 2 Swan Avenue, Strathfield DA 2021/0179	Demolition of the existing dwelling house and associated structures and construction of a three (3) storey x eighteen (18) room boarding house (incl. Manager's room) with parking for one (1) car, four (4) motorcycles and four (4) bicycles.	Approved – 01/03/2023
Mixed-Use Development 1-9 The Boulevarde and 2-10 Churchill Avenue, Strathfield DA 2016/87/0	Demolition of the existing buildings and construction of a fifteen storey mixed use development containing 1,853m^2 of retail floor space, 951m^2 of commercial floor space, one level containing plant at Level 10 and 24 residential units.	Approved – 16/11/2017
Residential Flat Building 11 Chapman Street, Strathfield DA 2021/0192	Development application for integrated development for the erection of a residential flat building containing 61 apartments, including basement carparking and associated site preparation, excavation, landscaping and other related works.	Approved – 25/03/2022
Residential Flat Building 10 Chapman Street, Strathfield DA2020/0247	Erection of a residential flat building containing 110 apartments, site preparation including demolition, excavation, landscaping and other related works.	Approved – 09/03/2022

Development	Description	Status
Residential Flat Building 30 Leicester Avenue, Strathfield DA 2021/0089	Proposed demolition of existing structures, amalgamation of lots and the construction of a 5-storey Residential Flat Building with 42 apartments above basement car park.	Approved – 03/06/2022

An assessment of the cumulative impacts associated with these projects are considered under the relevant issue in **Section 6.0**.

2.5 Analysis of Alternatives

Through the development of the Proposal, alternative options have been considered by the Applicant in response to the strategic need and objectives for the development of the Proposal. This includes not undertaking any works on the Site (Option 1), proceeding with a different use on the Site (Option 2), and proposing an alternative design (Option 3). The options which have been considered by the Applicant are outlined in the following subsections.

2.5.1 Option 1 – Do Nothing

The 'do nothing' scenario would involve taking no further action and allowing the approved Development Application (DA 2020/256) to lapse, rendering the redevelopment of the Site as unfeasible. It is recognised that high construction costs have become a significant prohibitor to new housing being developed.

The 'do nothing' scenario would result in the retention of the existing development on the Site, emphasising the Site's underutilisation in Strathfield Town Centre and approximately 200m west of Strathfield Station. The intensification of Strathfield Town Centre is vital in supporting new housing growth, economic development, creating new construction and operational employment opportunities, and the NSW Government's objective to deliver new diverse and well-located housing. Strathfield is a gateway with direct access to major centres like Parramatta, Penrith and Liverpool CBDs. Strathfield also being an express stop to the Sydney CBD stresses the importance of supporting new affordable and market housing options.

Further, this approach would eliminate the addition of affordable housing supply in Sydney's housing affordability crisis, further exacerbating wealth divides by pushing key workers further away from employment centres. The median house price in Strathfield in January 2025 was approximately $3.6 million compared to the Australian Median house price of $814,837, and the median unit prices in Strathfield are $748,995 compared to the national median of $815,258 (Domain / ABS, 2025). The 'Do Nothing' option would miss a critical opportunity to provide new affordable housing stock and diverse housing in this premium Sydney location.

2.5.2 Option 2 – Use of the Site for an Alternative Purpose

Alternative uses for the Site could include commercial premises, light industries, and information and education facilities under the MU1 Mixed Use zone under the Strathfield LEP 2012. The use of the Site for an alternative purpose compared to the proposed mixed-use development would not represent the most suitable outcome or highest and best use. This is primarily due to an alternative land use not being the highest and best use of the Site given its position at the western gateway of the Strathfield Town Centre on the corner of Pilgrim Avenue and Albert Road approximately 200m to the west of Strathfield Station.

The use of the Site for mixed use purposes will contribute to housing supply and resolving the housing shortage within the Greater Sydney Region and aligns with the current NSW Government objective of delivering more homes in places where people want to live. The current NSW Governments has made the need to deliver more residential development near transport hubs to leverage existing infrastructure capacity a fundamental policy objective. Therefore, the use of the Site for alternative purposes such as a primarily commercial use would fail to contribute housing supply in a desirable location and is not considered an appropriate alternative.

2.5.3 Option 3 – Alternative Designs

The Proposal has sought an alternative design from the approved plans in DA 2020/256 which allows for an increase from 8 to 35 affordable dwellings, slimmer podium and tower components, greater landscaped communal areas and increased dual facing units. Any alternative designs to the Proposal will not deliver these positive design outcomes.

The proposed affordable housing uplift will allow 165 units (72.4%) to receive a minimum of 2 hours of solar access during a winter solace which exceeds the ADG requirements of a minimum of 70%. An alternative design would not permit this amount of solar access meaning the proposed development would provide the best outcome for residents.

The SDRP meeting held on 20 November 2024, provided positive feedback on the Proposals design merits. Panel members commended the increase in density while maintaining residential amenity and architectural quality. This includes the preservation of privacy and increased solar access residents through a thinner two tower development allowing for the inclusion of 35 affordable housing dwellings. The panel also recognised the landscape design has been considered to provide accessible public and communal space while also envisaging any future development on the Shell Service Site. The feedback from the SDRP outlined the positive design merits of the Proposal that an alternative design would not achieve.

Allowing the 30% FSR increase reduces the bulk and mass of the building through the setback tower from the podium. The Proposal is more attractive as the building has been broken up into two narrow towers setback from the podium allowing more light to enter the ground. The proposed design will be better option compared to an alternative design. For further details on the proposed design, please refer to the Design Report located in **Appendix K**.

2.5.4 Option 4 – The Proposal

The Proposal seeks to deliver a mixed use development comprising 228 dwellings including 35 affordable housing dwellings and is the result of a thorough planning process. After careful consideration and analysis, the decision to utilise the NSW Government's affordable housing policy was the most suitable option for this Site for the following reasons:

- It supports the delivery of a 15.35% affordable housing contribution equating to 35 dwellings for very low to moderate income households in a well-located area during a housing affordability crisis;
- It will revitalise an underperforming site in the Strathfield Town Centre with new commercial premises, significant housing contribution and public domain works;
- It will improve the feasibility of redevelopment and ability to off-set current high construction costs; and
- It will deliver more housing supply to the private and affordable housing market, reducing pressure off key-workers ability to find adequate affordable housing in well-located areas.

3.0 Project Description

3.1 Project Overview

The Applicant seeks development consent under 'Division 4.7 – Stage Significant Development' of the EP&A Act for site preparation works and erection of a mixed-use development including two (2) 20-storey towers and podium comprising a total of 228 dwellings (including 35 affordable dwellings) and two (2) commercial tenancies on the ground floor.

Specifically, this SSDA seeks approval for:

- 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 1,600m^2 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 levels of basement parking with a total of 237 car parking spaces comprising:
  - 195 residential car parking spaces (inclusive of 35 accessible spaces);
  - 17 commercial car parking spaces (inclusive of 2 accessible spaces); and
  - 25 visitor car parking spaces (inclusive of 3 accessible spaces).
- Street tree planting and landscaping, extension and augmentation of services and infrastructure as required.

The Proposal is detailed on the Architectural Drawings prepared by Kennedy Associates Architecture included at **Appendix B**. It is accompanied by Landscape Drawings prepared by Melissa Wilson Landscape Architects included at **Appendix I**.

The proposed Ground Floor Plan is presented in **Figure 12** below, with visualisations provided in **Figure 13** and **Figure 14** on the following page.

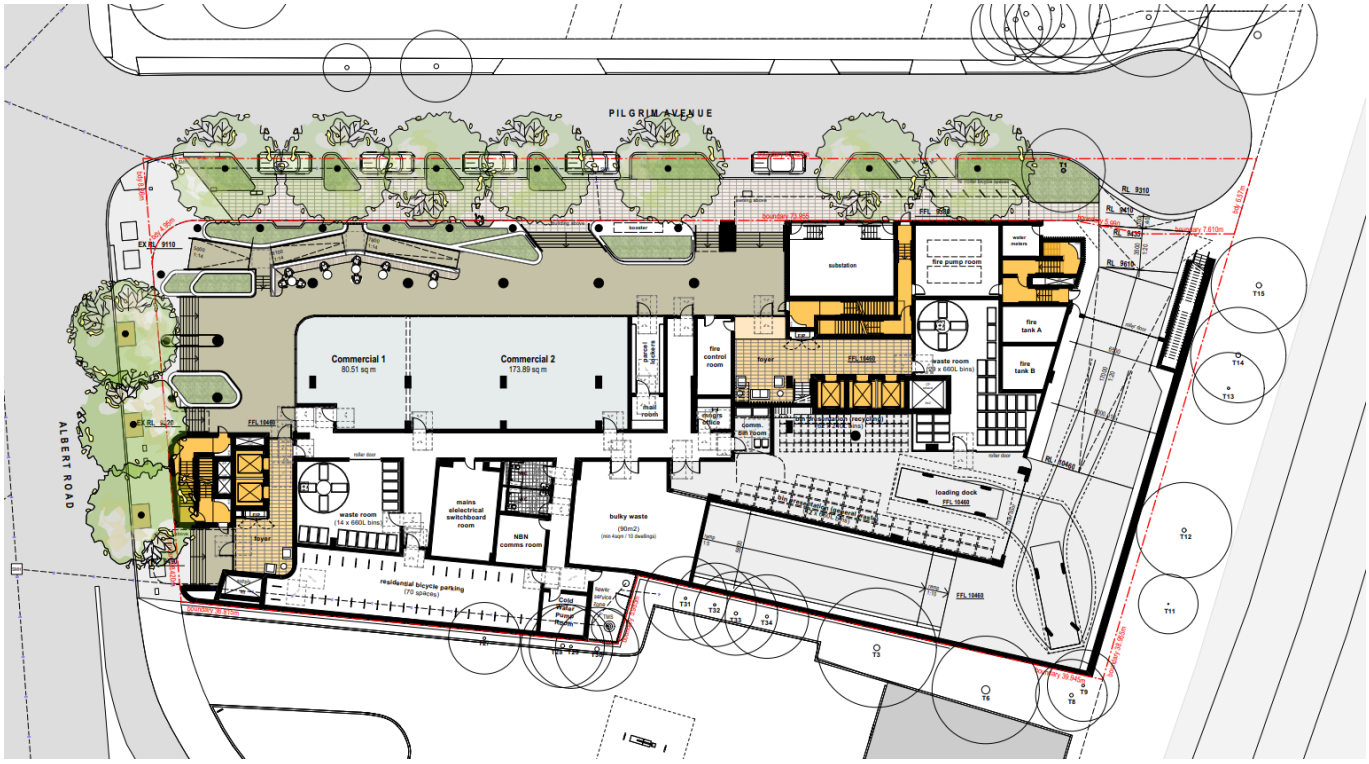


Figure 12 Proposed Ground Level Plan

Source: Kennedy Associates Architects

Figure 13 Perspective Visualisation of the Proposal from Albert Road to the South-West

Source: Kennedy Associates Architects

Figure 14 Perspective Visualisation of the Proposal from the Road Corridor to the North-East

Source: Kennedy Associates Architects

3.2 Key Project Information

3.2.1 Project Area

The project area represents the entirety of the Site as identified and described in **Section 2.2**.

3.2.2 Project Details

The key details relating to the Proposal are outlined in **Table 7** below.

Table 7 Key Project Details

Component	Description	
Site Area	3,361.90m^2	
Developable Area	2,868.8m^2	
Land Uses	• Shop-top housing • Commercial premises	
Gross Floor Area	19,497m^2 (18,624m^2 excluding wintergardens)	
Floor Space Ratio	6.79:1 (6:49 excluding wintergardens)	
Building Height	70.2m (RL 79.460)	
Basement Setbacks	The basement levels are setback 6m to the railway corridor to the north and adjoin the boundaries of the site to the south, west and east, with the exception of the 2.45m setback to the sewer service zone at the central portion of the eastern rear boundary adjoining the Shell Service Station.	
Podium Setbacks	The podium undercroft along Pilgrim Avenue, Albert Road and the rear boundary to the Shell Service Station is setback 0m. The podium along the northern elevation facing the railway boundary is setback 2m.	
Tower Setbacks	**Building A** • East – 0m • South – 0m • West – 5.85m **Building P** • North – 2.8m • East – 7.35m-14.5m • West – 0m	
Tower Separation	11.75m – 13.05m	
Layout	**Component**	**Use(s)**
	Basement 1-4	Parking
	Ground Floor	Commercial, Basement Entry, Lobbies, Loading Dock, Plant
	Podium (Levels 1-3)	Residential
	Podium Roof (Level 4)	Residential, Communal Open Space
	Building A Tower (Levels 5-19)	Residential
	Building P Tower (Levels 5-19)	Residential
	Building A Roof (Level 20)	Plant
	Building P Roof (Level 20)	Plant

Component	Description		
Apartments and Mix	**Dwelling Type**	**Quantity**	**Percentage**
	1 Bedroom	57	25%
	2 Bedroom	155	68%
	3 Bedroom	16	7%
	Total	**228**	**100%**
Affordable Housing	**Unit Type**	**Bedrooms**	**Unit Mix**
	1 Bed	9	25.7%
	2 Bed	25	71.4%
	3 Bed	1	2.9%
Parking	**Component**	**Total**	
	Basement 1	• 17 Commercial Spaces (2 accessible) • 25 Visitor Spaces (3 accessible) • 15 Residential Spaces (2 accessible)	
	Basement 2	• 60 Residential (11 accessible)	
	Basement 3	• 60 Residential (11 accessible)	
	Basement 4	• 60 Residential (11 accessible)	
	Total	• **17 Commercial Spaces** (incl. 2 accessible) • **25 Visitor Spaces** (incl. 3 accessible) • **195 Residential Spaces** (incl. 35 accessible spaces)	
Tree Canopy Coverage	444.67m^2 (15.5%)		
Construction Jobs	221		
Operational Jobs	26		
Estimated Development Cost	$110,404,398 (excluding GST)		

3.3 Site Preparation Works

The Proposal includes site preparation works in order to facilitate the proposed mixed use development, with a detailed description of the components provided in the following subsections.

3.3.1 Demolition and Tree Removal

All existing buildings and structure on the Site are proposed to be demolished and twenty-six (26) trees are required to be removed to enable the proposed development. For further discussion on the proposed tree removal, refer to **Section 6.10** and the Arboricultural Impact Assessment (**Appendix V**).

A detailed Construction Environmental Management Plan will be prepared by the appointed Construction Contractor prior to demolition works commencing, in accordance with a condition of consent. It will outline the extent of demolition works and the process and techniques to ensure the appropriate disposal of materials. The proposed Demolition Plan is provided in **Figure 15** below and is included within the Architectural Drawings (**Appendix B**).

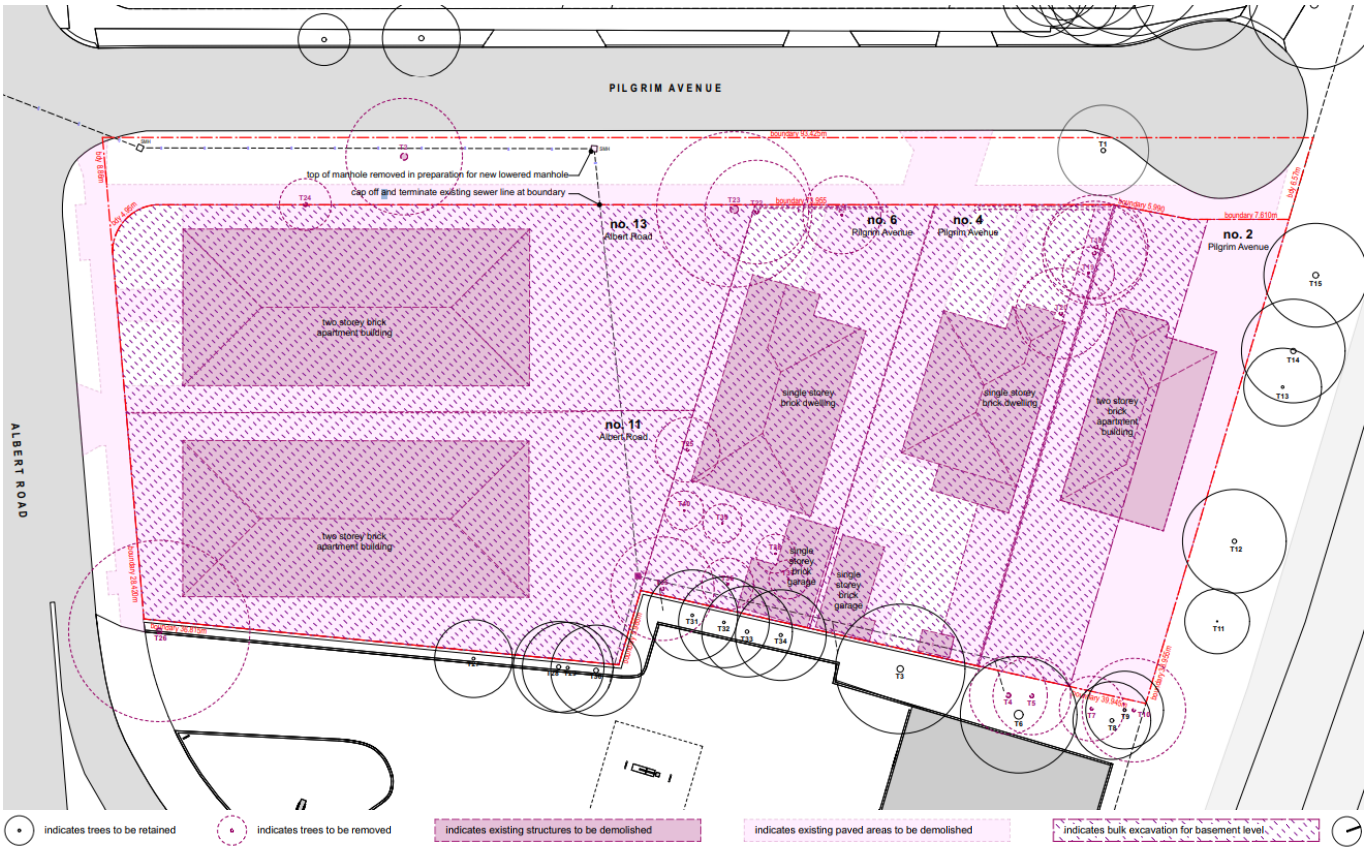


Figure 15 Proposed Demolition Plan

Source: Kennedy Associate Architects

3.3.2 Remediation and Bulk Excavation

To make the Site suitable for the proposed land uses, any contaminated or hazardous materials will be removed in accordance with NSW EPA standards and the methodology and recommendations of the Additional Site Investigation (**Appendix U**). For further discussion, refer to **Section 6.9**.

The Proposal includes the bulk excavation of the proposed four (4) basement levels approximately 13.4m below natural ground level to RL -2.92m. The extent of the basement is generally to the Site boundary, with the exception of a 6m setback to the northern boundary and 2.45m setback along a portion of the western boundary. The excavation associated with the Proposal will also include shoring of the basement to support the tower structure.

The extent of the proposed basement and setback to the north boundary is illustrated in **Figure 16** below.

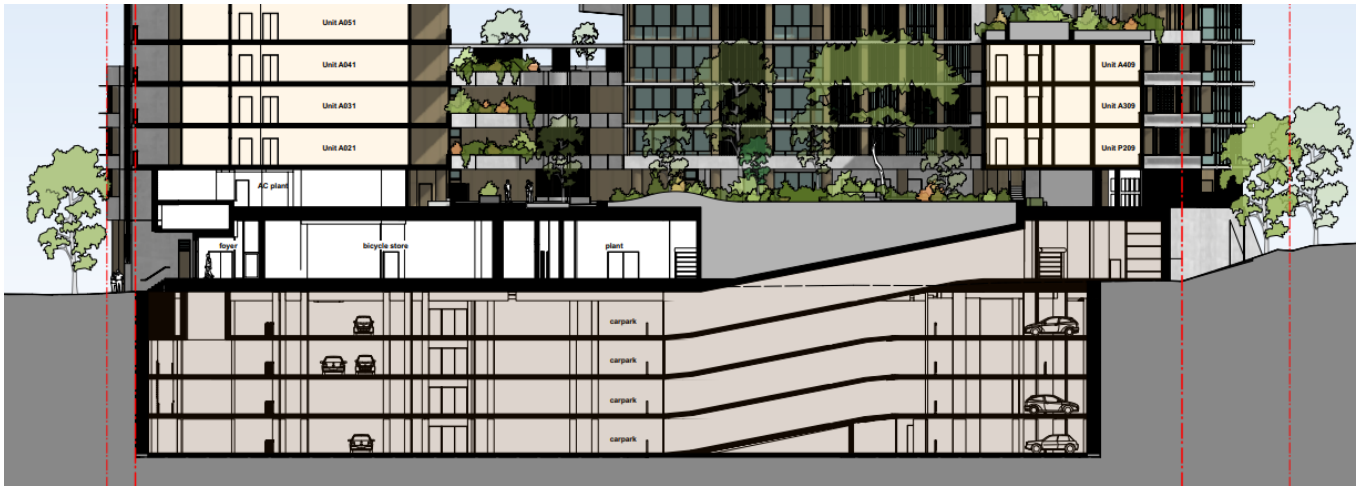


Figure 16 Basement Section Plan (North-South)

Source: Kennedy Associates Architects

3.4 Layout and Built Form

The land use, layout and built form of the Proposal comprises three (3) main elements, being the shared basement, podium (commercial, lobbies and residential units) and tower (residential units and amenities). The design of these elements has been informed by the Site's location in the context of key surrounding context including its position in the Strathfield Town Centre, adjacent mid-rise built form and the desired future character of the area.

The layout and built form of the Proposal are discussed in the following subsections.

3.4.1 Key Details

The proposed land uses and associated GFA is described in **Table 8** below.

Table 8 Gross Floor Area

Land Use	Levels	Gross Floor Area	Floor Space Ratio
Residential	Ground Floor – Level 19	19,111m^2 (18,238m^2 excluding wintergardens)	6.66:1 (6.36:1 excluding wintergardens)
Commercial	Ground Floor	386m^2	0.13:1
Total		**19,497m^2 (18,624m^2 excluding wintergardens)**	**6.79:1 (6.49 excluding wintergardens)**

The proposed built form includes a shared podium and two (2) towers identified as Building A (fronting Albert Road to the south) and Building P (fronting Pilgrim Avenue to the west). The Proposal includes a total of 228 residential apartments and a mix of apartment types, as outlined in **Table 9**. A total of 35 dwellings will be designated for the purposes of affordable housing.

Table 9 Dwelling Summary

Apartment Type	Apartment Quantity	Apartment Mix
Building A		
1 Bed	21	9.2%
2 Bed	45	19.7%
3 Bed	15	6.6%
Subtotal	**81**	**35.5%**
Building P		
1 Bed	36	15.8%
2 Bed	110	48.3%
3 Bed	1	0.4%
Subtotal	**147**	**64.5%**
Total	**228**	**100%**

3.4.2 Basement and Ground Floor

The Proposal comprises a four (4) level basement and ground floor level comprising car parking, storage units and a Grease Arrestor Room. Basement levels 1-4 comprise car parking with a total of 237 spaces. It includes 195 car parking spaces allocated to the residential component of the development, 17 spaces to the commercial tenants and 25 visitor spaces. A total of 40 car parking spaces are designed to be accessible spaces.

As illustrated in **Figure 17** the basement entry is made at the northern end of Pilgrim Avenue. The Ground Level includes two (2) commercial tenancies that open out into a publicly access area supported by landscaping and

two (2) residential lobbies for each tower access from the public forecourt. It also includes bicycle parking, loading dock accessed via Pilgrim Avenue and mechanical plant.

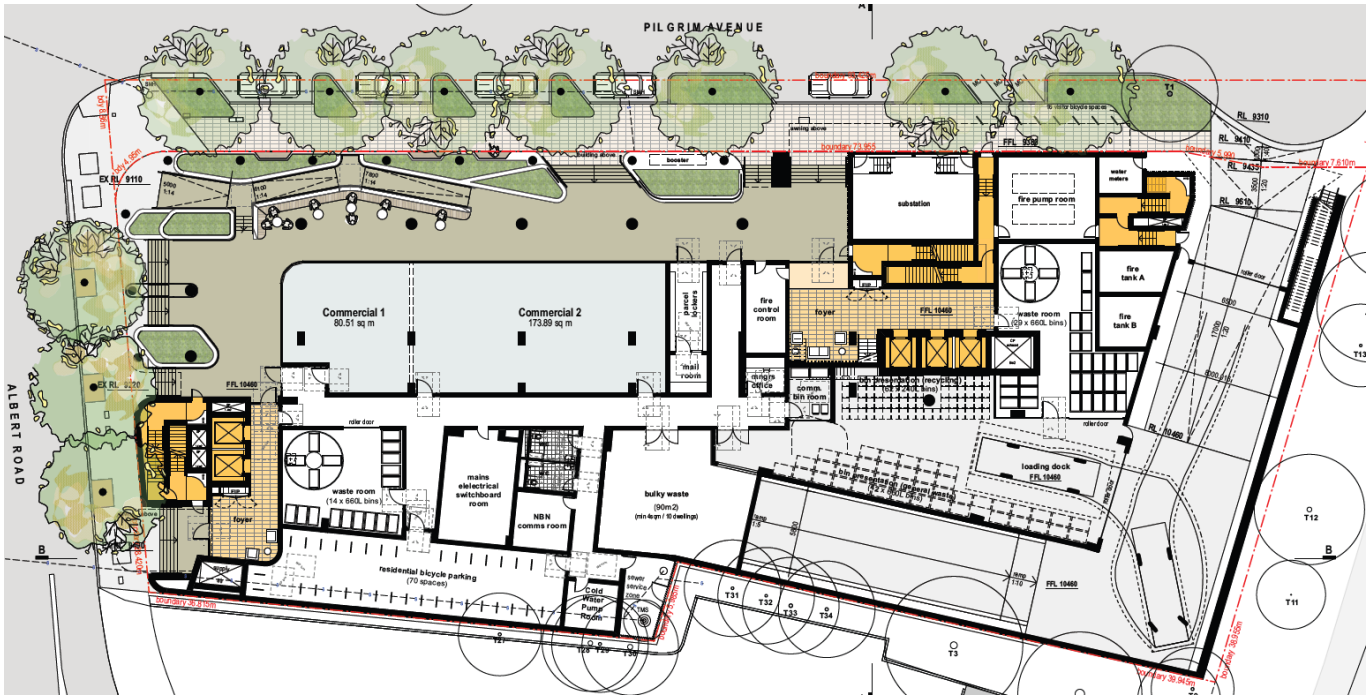


Figure 17 Proposed Ground Floor Plan

Source: Kennedy Associates Architects

3.4.3 Podium

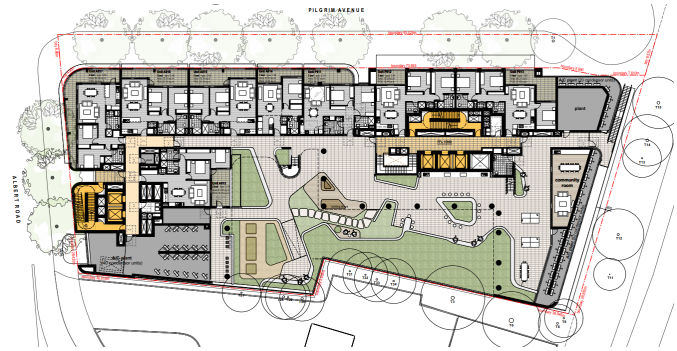
The podium of the proposed built form represents Levels 1-3 on the western elevation with a podium element up to Level 5 on the eastern elevation, comprising residential dwellings throughout and communal open space including community facility on Level 1. The podium roof (Level 4) includes additional communal open space for residents. The podium form is depicted in the visualisation presented in **Figure 18** below.

Figure 18 Visualisation of the Podium on the corner of Pilgrim Avenue and Albert Road

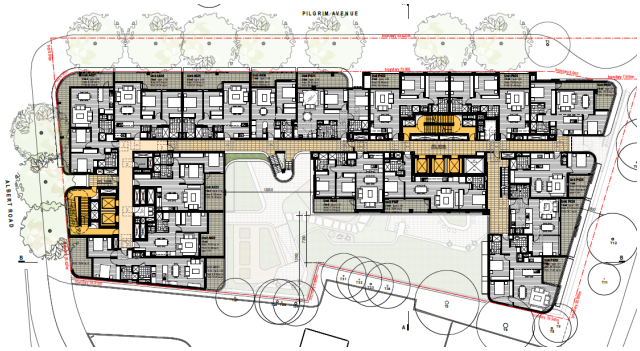
Source: Kennedy Associates Architects

The above ground floor levels that form part of the podium can be described in the following ways:

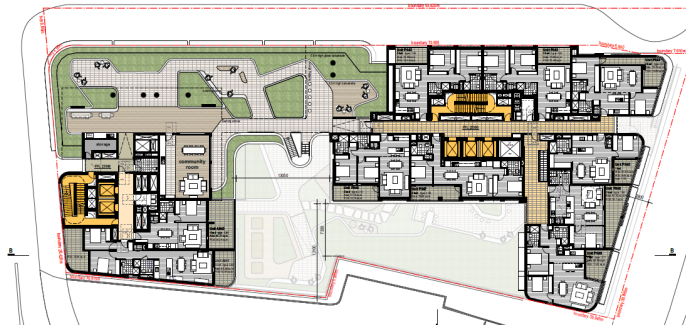
- **Level 1** – Eight (8) residential apartments, three (3) separate plant rooms and a shared eastern outdoor courtyard for residents;
- **Levels 2-3** – Sixteen (16) residential apartments and stair access to the internal eastern courtyard;
- **Level 4** – Located on the roof of the podium is a community room, residential courtyard on the south-western portion of the footprint, BBQ facilities, ten (10) residential apartments; and
- **Level 5** – A northeastern shared residential courtyard with associated landscaping and ten (10) residential apartments.



Level 1



Level 2-3



Level 4

Level 5

Figure 19 Podium Floor Plans

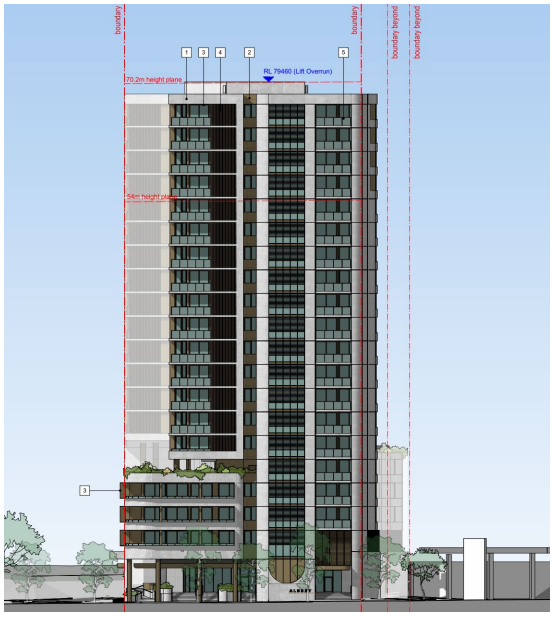
Source: Kennedy Associates Architects

3.4.4 Tower

The tower element of the proposed built form comprises Levels 6-19 with residential apartments located on all levels and area dedicated for mechanical plant and lift overrun on the roof. The tower form comprises two (2) tower elements identified as Building A (fronting Albert Road) and Building P (fronting Pilgrim Avenue). The towers are located perpendicular to each other to support solar access and amenity.

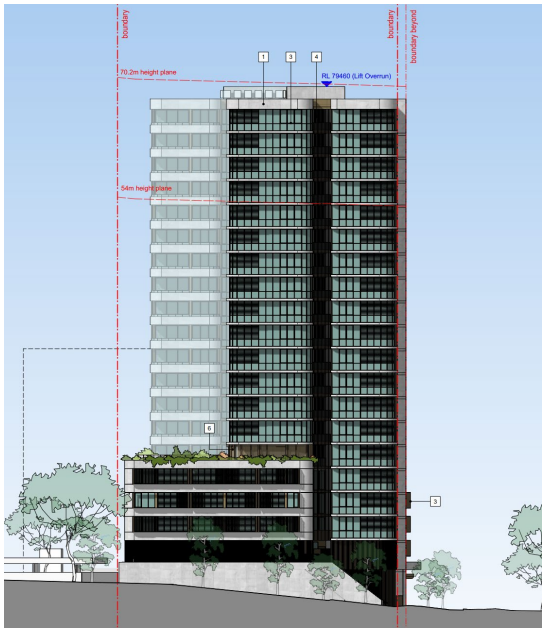
The proposed tower layout and form is depicted in the elevations provided in **Figure 20**. The towers have a total height of 70.2m (RL 79.46) to the lift overrun and consist of residential dwellings and a rooftop plant. The tower component can be described in the following ways:

- **Levels 6-19** – Twelve (12) residential apartments and associated building amenities; and
- **Roof** – Two (2) plant rooms and an indicative solar panel system.

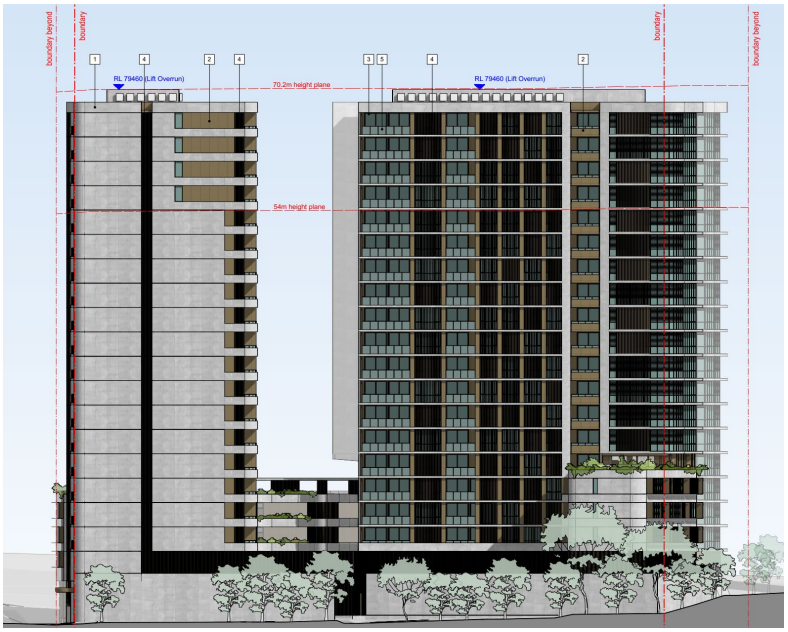


South-West

North-West



North-East



South-East

Figure 20 Proposed Elevations

Source: Kennedy Associates Architects

Wintergardens

The Proposal includes wintergardens to the northern end of Building P to address the anti-throw requirements of Sydney Trains and assist with acoustic privacy from the railway. The intention is to seek exemption for the enclosed area of the wintergardens from the GFA calculations, via a Clause 4.6 Variation (**Appendix J**), on the basis that the wintergardens would not normally be required and are a response to the unusual constraints on the Site adjacent to the rail corridor.

Wintergardens to the units facing the rail corridor will:

- Comply with anti-throw requirements in accordance with the DoP's interim guidelines for "Development Near Rail Corridors and Busy Roads";
- Assist with acoustic amenity and mitigation of noise generated by the rail corridor; and
- A detailed assessment of the internal GFA attributed to these areas is included in the Clause 4.6 Variation.

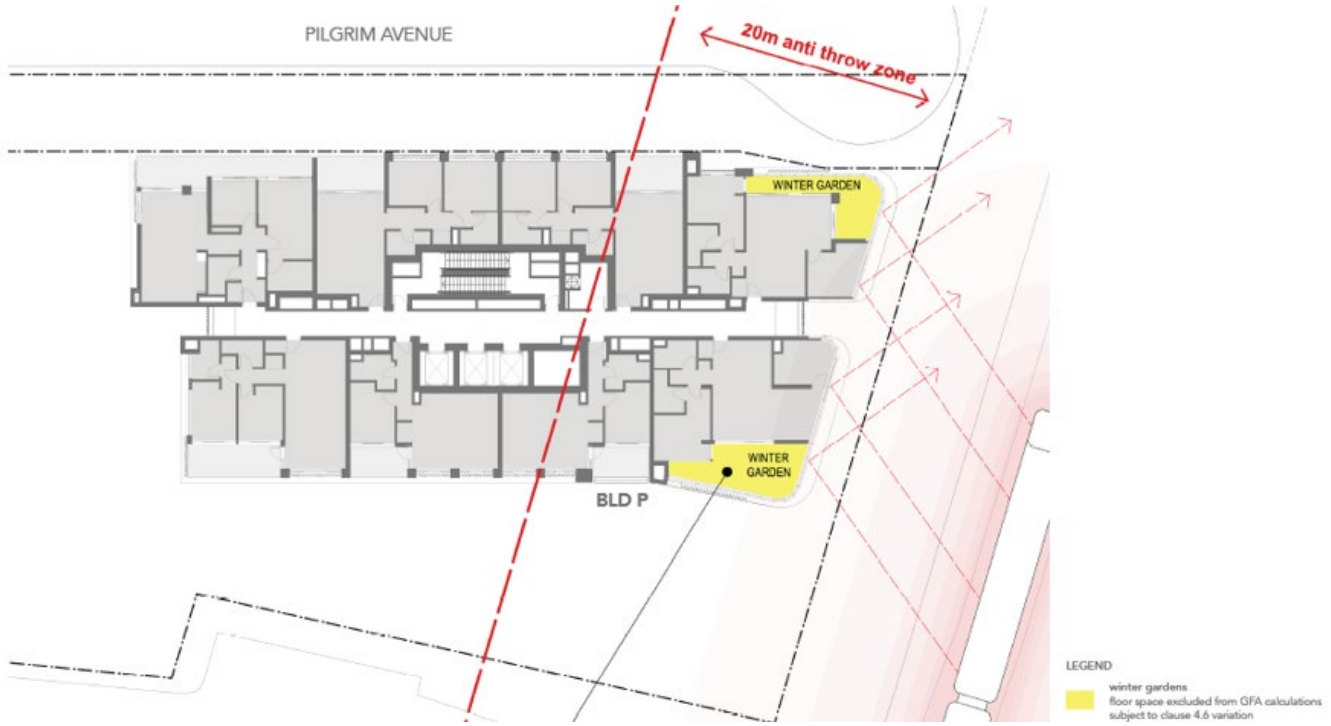


Figure 21 Wintergardens Plan

Source: Kennedy Associates Architects

3.5 Façade and Materiality

The façade and materiality at the ground level and podium has been designed with setback shopfronts to the commercial tenancies and site access allowing for outdoor dining areas and communal space. It incorporates an off form finish colour with mid grey concrete walls and mid bronze powder-coated aluminium metal cladding as the main materiality of the facade.

On the podium levels, mid-bronze powder-coated aluminium window and door framed shading hoods as well as identical shaded battens and vertical fin screens.

The balcony facade in the residential tower comprises a clear glass within a mid-bronze powder-coated aluminium frame, supported by the off form finished concrete face, creating a consistent building façade from podium to tower. All windows and door frames leading to the balcony follow the mid-bronze powder-coated aluminium colour palette.

Operable louvre windows are situated behind the vertical aluminium batten and fin screens, strategically placed within bedrooms and living rooms to enhance privacy and shading throughout the apartments. The concrete profiles and extruded aluminium components, along with bronze tinted glass, are utilised in the construction of the residential facade to ensure durability and achieve clarity in the design.

A breakdown of the ground floor, podium and tower façade finishes is presented in **Figure 22** below.

Figure 22 Proposed Façade and Materality

Source: Kennedy Associates Architects

3.6 Landscaping Public Domain

The proposed landscaping is depicted on the Landscape Drawings prepared by Melissa Wilson Landscape Architects included at **Appendix I**. The Proposal includes new landscape planting at the ground level, new street planting along Pilgrim Avenue and Albert Road, and the podium roof which incorporates to Connecting with Country principles as discussed in the Design Report in **Appendix K**.

At the ground level, landscape planting is proposed along the Pilgrim Avenue boundary with nature strip planters, under cover outdoor seating, street trees and stairways. This creates a welcoming environment for each residential lobby located directly off the public forecourt area. The proposed landscaping on the ground level is illustrated in **Figure 23** below.

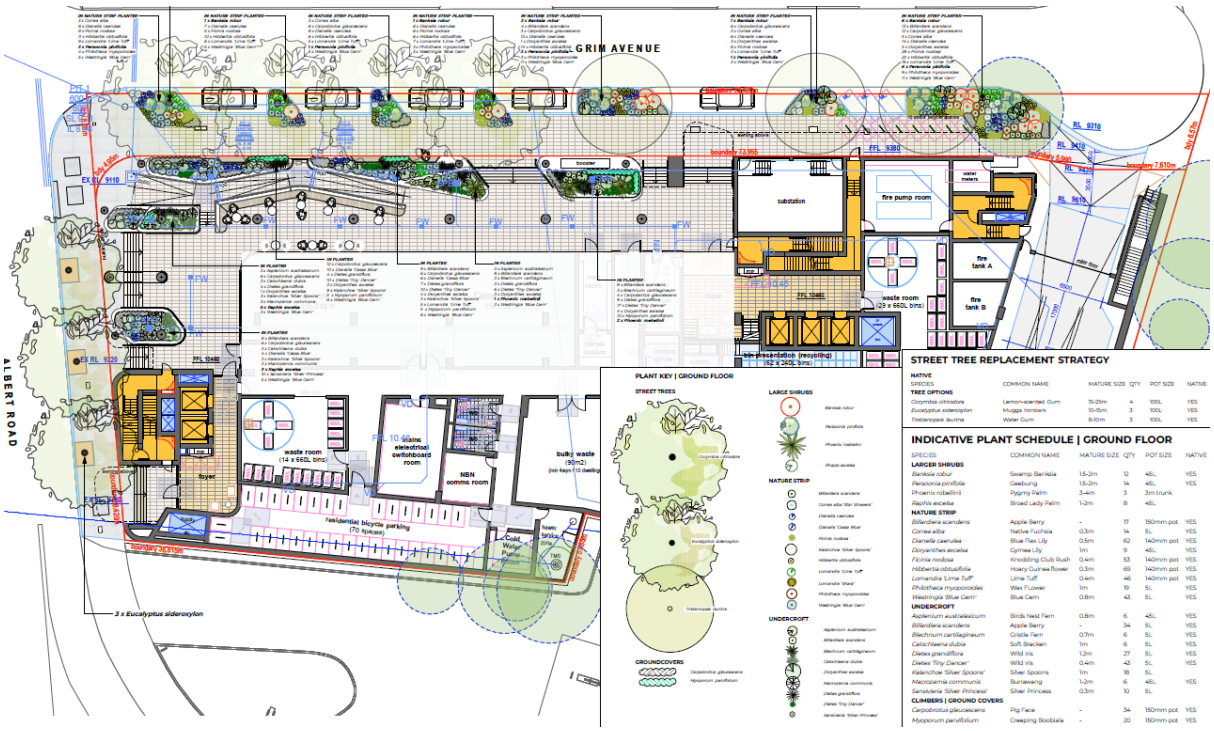


Figure 23 Ground Floor Landscape Plan

Source: Melissa Wilson Landscape Architects

Further, landscaping is also proposed on the communal areas above the ground plane, including Level 1, 4 and 5 to provide amenity for residents. The proposed landscaping in these areas is illustrated in **Figure 24** below and **Figure 25** following.

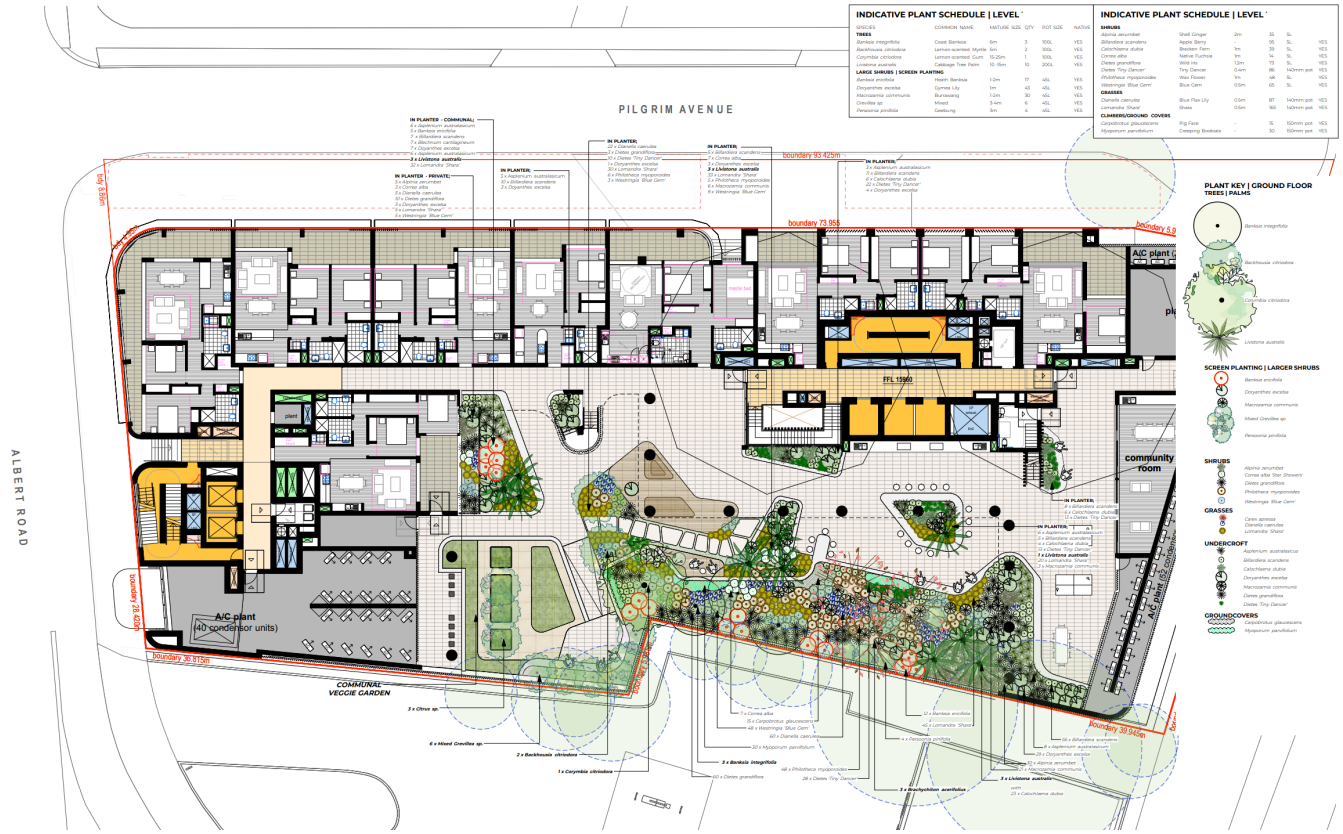
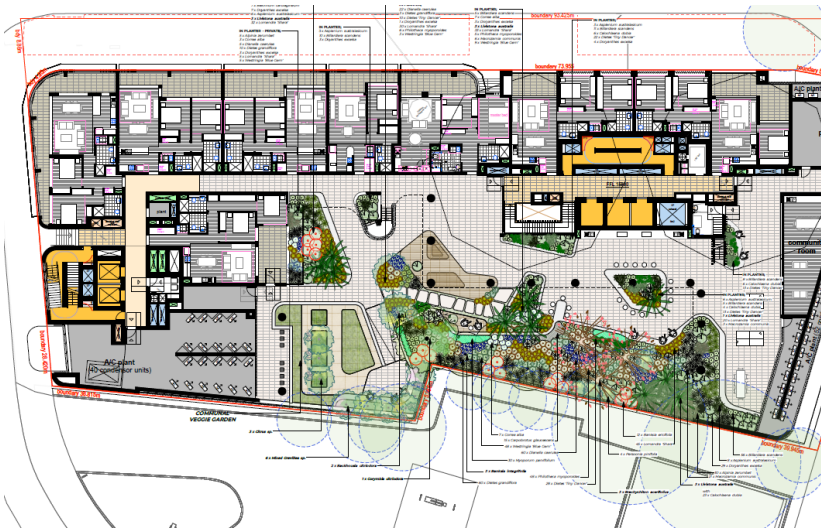


Figure 24 Level 1 Landscape Plan

Source: Melissa Wilson Landscape Architects



Level 4

Level 5

Figure 25 Level 4-5 Landscape Plan

Source: Melissa Wilson Landscape Architects

3.7 Site Access, Parking and Loading

3.7.1 Pedestrian Access

Pedestrian access will be provided from the footpaths along Albert Road and Pilgrim Avenue. Internal access is provided via secure lobbies with the residences in Building A and Building P having separate lobbies and lift access. Lobbies are shared with the standard residential apartments to facilitate social interactions between all residents and include secure mailboxes and a clear line of sight to the lifts and exits.

3.7.2 Vehicle Access

Vehicular access to the Site is proposed from Pilgrim Avenue, which has been designed as a shared car park entry ramp to facilitate vehicular (both car and truck) movements in and out of the Site. The Proposal provides a total of 237 car parking in the basement, and 62 bicycle parking spaces across the development. No vehicular access is proposed from Albert Road, with all vehicle access from Pilgrim Avenue.

The proposed parking and loading allocation is detailed in **Table 10** below with further detail provided in the Traffic and Parking Assessment Report (**Appendix P**).

Table 10 Proposed Parking Schedule

Type	Quantity
Car Parking	237 spaces, including: • 17 commercial spaces (incl. 35 accessible); • 25 visitor spaces (incl. 3 accessible); and • 195 residential spaces (incl. 35 accessible spaces).
Bicycle Parking	86 spaces, including: • 70 residential spaces; and • 16 visitor spaces.

3.7.3 Service Vehicle Access and Loading

The Proposal includes a loading dock located on the ground floor, which will house commercial delivery trucks and Council's garbage truck, with a dedicated service area proposed. The manoeuvring area has been designed to accommodate the swept turning path requirements of 10m long rigid trucks, allowing them to always enter and exit the site in a forward direction.

Furthermore, a series of swept turning paths of Council's 10m long garbage truck have also been prepared which show the trucks accessing the loading dock, as illustrated in **Figure 26** below and the supporting Traffic and Parking Assessment Report (**Appendix P**).

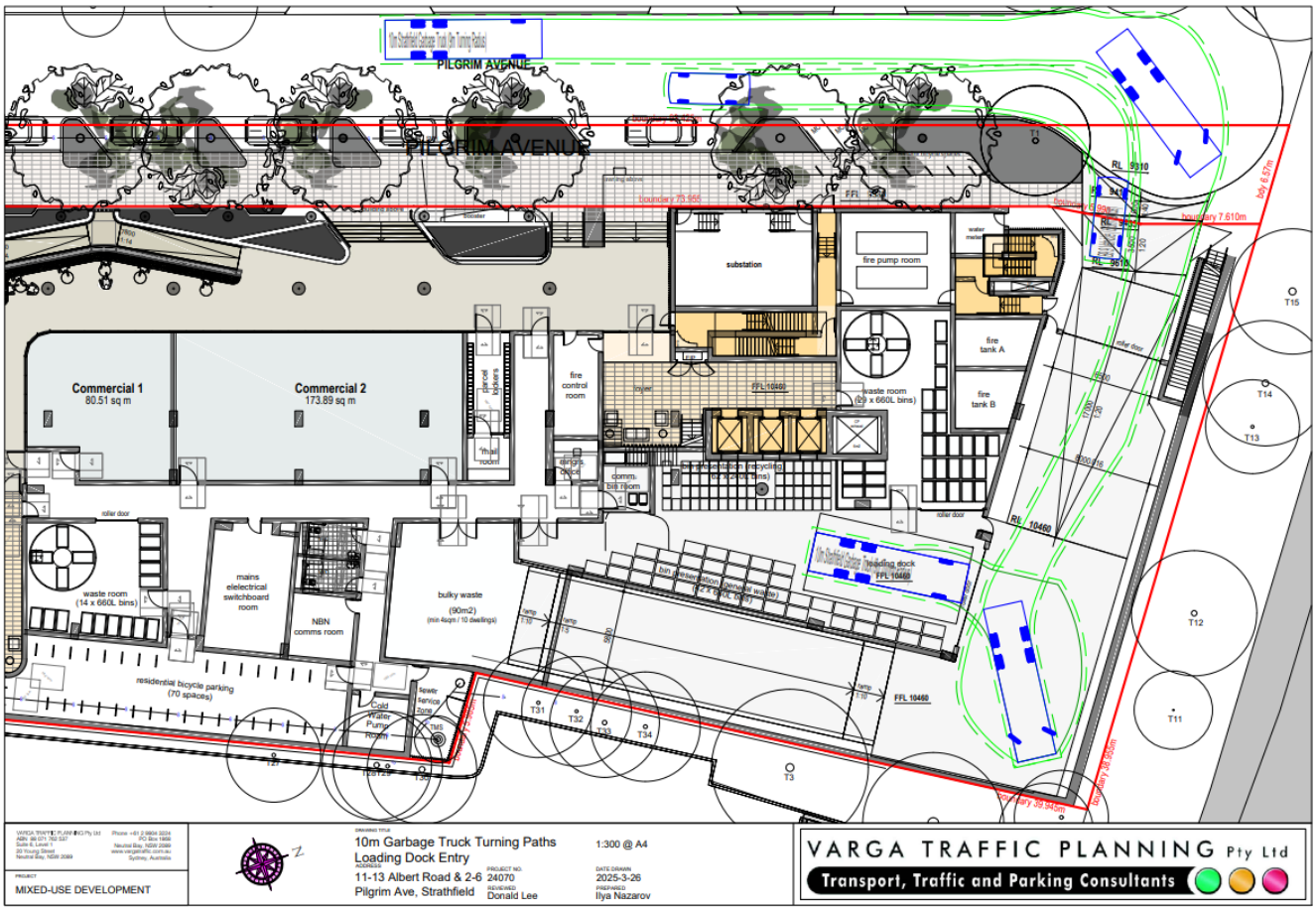


Figure 26 10m Garbage Truck Turning Paths Loading Dock Entry

Source: Varga Traffic Planning

3.8 Construction and Staging

The proposal will be delivered in a single stage. However, it is anticipated the works will be sequenced in order to deliver the project and the appointed contractor will be responsible for developing the final construction phasing sequence prior to the commencement of works. The indicative phases of the project are:

1. Enabling works and demolition
2. Retention, earthworks, site levelling
3. Structure
4. Façade and fit-out
5. External works

As the project is in the preliminary planning stage, the timeframes associated with each phase are not confirmed and will be detailed further as part of the detailed Construction Environmental Management Plan.

3.9 Affordable Housing Provider

Subject to resolving commercial arrangements, the affordable housing component will be managed by Strathfield Partners, a registered Community Housing Provider (CHP) for at least 15 years commencing on the day an Occupation Certificate is issued for the development. Refer to the Community Housing Provider Letter of Support prepared by Strathfield Partners included at **Appendix GG**.

4.0 Statutory Context

The Applicant seeks development consent under 'Division 4.7 – Stage Significant Development' of the EP&A Act. The following subsections outline the Proposal's key statutory requirements, which is complemented by a Statutory Compliance Table included at **Appendix C** identifying all relevant statutory requirements and where those requirements have been addressed.

4.1 Power to Grant Approval

The legislative pathway under which the consent is sought, why the pathway applies, and the relevant consent authority is outlined in **Table 11** below.

Table 11 Power to Grant Consent

Matter	Consideration
Declaration of State Significant Development	Development consent will be sought under 'Division 4.7 - Stage Significant Development' of the EP&A Act. Section 4.36(2) of the EP&A Act states that: *A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.* Schedule 1 of the Planning Systems SEPP lists development that is declared SSD for the purposes of the EP&A Act. Section 26A of Schedule 1 states: *(1) Development to which State Environmental Planning Policy (Housing) 2021, Chapter 2, Part 2, Division 1 applies if—* *(a) the part of the development that is residential development has an estimated development cost of—* *(i) for development on land in the Eastern Harbour City, Central River City or Western Parkland City in the Six Cities Region—more than $75 million, or* *Note—* *The Act, Schedule 9 sets out the local government areas in each city in the Six Cities Region.* *(ii) for development on other land—more than $30 million, and* *(b) the development does not involve development prohibited under an environmental planning instrument applying to the land.* As the Proposal is for the purposes of residential development including in-fill affordable housing within the Greater Sydney Region with an EDC of more than $75 million, it is declared SSD. Before an SSD can be determined, it is subject to a comprehensive assessment under the EP&A Act. In accordance with Clause 2.6(2) of the Planning Systems SEPP, all parts of a Development Application are also declared SSD for the purposes of EP&A Act.
Consent Authority	Section 4.5 of the EP&A Act and Section 2.7 of *State Environmental Planning Policy (Planning Systems) 2021* stipulate that the consent authority is the Minister for Planning and Public Spaces (or the DPHI as their delegate) unless the development triggers the matters set out in Section 2.7(1) in which case the consent authority will be the Independent Planning Commission.

4.2 Permissibility

The permissibility of the Proposal, considering the proposed land use/s and zoning, is outlined in **Table 12** below.

Table 12 Permissibility

Matter	Consideration
Land Use	The Proposal constitutes development for the purposes of *shop-top housing* and *commercial premises* defined under the Standard Instrument.
Land Zoning	The Site is zoned MU1 Mixed Use under the Strathfield LEP 2012.
Permissibility	The proposed uses of *shop-top housing* and *commercial premises* are permissible with consent in the MU1 Mixed Use zone. The Proposal is therefore permissible within consent.

4.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in **Table 13** below.

Table 13 Other Approvals

<table>
<tr><th>Matter</th><th>Consideration</th></tr>
<tr><td>Approvals not required for SSD</td><td>Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State significant development. The following legislative approvals would otherwise be required if the Project was not State significant.
<table>
<tr><th>Legislation that does not apply to State Significant Development</th><th>Approval Otherwise Required</th></tr>
<tr><td>(b) a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,</td><td>No</td></tr>
<tr><td>(c) an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977</td><td>No</td></tr>
<tr><td>(d) an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,</td><td>No</td></tr>
<tr><td>(f) a bush fire safety authority under section 100B of the Rural Fires Act 1997,</td><td>No</td></tr>
<tr><td>(g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.</td><td>No</td></tr>
</table></td></tr>
<tr><td>Consistent Approvals</td><td>Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The following table lists legislative approvals that are required for the Project and cannot be refused if the Project is approved.
<table>
<tr><th>Legislation that must be applied consistently</th><th>Approval Required</th></tr>
<tr><td>(a) an aquaculture permit under section 144 of the Fisheries Management Act 1994,</td><td>No</td></tr>
<tr><td>(b) an approval under the Coal Mine Subsidence Compensation Act 2017, section 22,</td><td>No</td></tr>
<tr><td>(c) a mining lease under the Mining Act 1992</td><td>No</td></tr>
<tr><td>(d) a production lease under the Petroleum (Onshore) Act 1991,</td><td>No</td></tr>
<tr><td>(e) an environment protection licence under Chapter 3 of the Protection of the Environment Operations Act 1997 (for any of the purposes referred to in section 43 of that Act),</td><td>No</td></tr>
<tr><td>(f) a consent under section 138 of the Roads Act 1993</td><td>Yes</td></tr>
<tr><td>(g) a licence under the Pipelines Act 1967</td><td>No</td></tr>
</table></td></tr>
<tr><td>EPBC Approval</td><td>The Environmental Protection and Biodiversity Act 1999 Act (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. If the Proposal will, or is likely, to impact a matter of Matters of National Environmental Significance (MNES), then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a ‘controlled action’ requiring EPBC approval.

The Proposal is situated in a highly urbanised area without significant vegetation and has been granted a Biodiversity Development Assessment Report (BDAR) Waiver by the NSW Department of Climate Change, Energy, the Environment, and Water (DCCEEW) – Conservation Programs, Heritage, and Regulation (CPHR) Group. It will therefore no impact on a MNES and is not required to be referred.</td></tr>
</table>

4.4 Pre-Conditions to Exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in **Table 14** below.

Table 14 Pre-Conditions to Exercising the Power to Grant Consent

Matter	Consideration
Biodiversity Conservation Act 2016	Section 7.9 of the Biodiversity and Conservation Act 2016 (BC Act) requires an SSDA to be accompanied by a Biodiversity Development Assessment Report (BDAR), unless the Planning Agency Head and the Environment Agency Head determine that the Proposal is not likely to have any significant impact on biodiversity values. A BDAR Waiver was granted for SSD-80432461 by the NSW DCCEEW – CPHR Group on 7 March 2025 (refer to **Appendix Z**).
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.98 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) requires the consent authority to refer the SSDA to the relevant rail authority and take into consideration feedback received. The Proposal is supported by an Electrolysis & Stray Traction Current Report (**Appendix FF**) which identifies the following result of the investigation: • Stray traction current can be expected to be present on the Site. • Corrosion of the water and fire services or the electrical earth can be caused by stray traction current. Installation of an insulating fitting in the water and fire services, or the use of a non-metallic water meter or PVC pipe eliminates this hazard. Compliance with Section 2.98 can be achieved if the proposal follows the recommendations and mitigation measures outlined in the Electrolysis & Stray Traction Current Report
	Section 2.99 of the Transport and Infrastructure SEPP requires the relevant rail authority to provide concurrence to development that involves excavation of at least 2m below ground level within 25m of a rail corridor. As described in **Section 3.3.2**, the Proposal involves excavation of four (4) basement levels approximately 13.4m below natural ground level and is located within 25m of the adjacent rail corridor to the north.
	Section 2.100 of the Transport and Infrastructure SEPP requires the consent authority to take into consideration the relevant rail noise and vibration requirements that are issued by the Planning Secretary. The Proposal will not result unacceptable noise impacts for future residents, as outlined in the Acoustic Report (**Appendix Q**).
	Section 2.122 of the Transport and Infrastructure SEPP requires the consent authority to provide Transport for NSW with written notice of the development application for developments considered a 'traffic generating activity'. This Proposal is considered 'traffic generating activity' as it includes development for the purposes of residential accommodation with more than 75 dwellings with access to a classified road or a road that connects to a classified road.
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose. An Additional Site Investigation Plan prepared by EI Australia (**Appendix U**) confirms that the Site can be made suitable for the proposed development and use. For further discussion on contamination and remediation, refer to **Section 6.9**.
State Environmental Planning Policy (Housing) 2021	Chapter 4 of *State Environmental Planning Policy Housing 2021* (SEPP Housing) details provisions relating to the design quality of residential apartments to ensure that they provide an appropriate level of amenity. A Design Verification Statement is required as a pre-condition to granting of consent, and an assessment of the Proposal against the objectives and principles of the Apartment Design Guide (ADG) has been prepared by Kennedy Associate Architects and is provided within the Design Report (**Appendix K**).

4.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified and considered in **Table 15** below.

Table 15 Mandatory Matter for Consideration

Legislation	Matters for Consideration
Environmental Planning & Assessment Act 1979	The EP&A Act regulates all development in NSW, establishing the procedures and objects for all development. Section 1.3 of the EP&A Act sets out the objects of the Act. The Proposal is consistent with the objects of the Act for the following reasons: • It positively contributes to housing supply and affordability through the delivery of 35 affordable housing dwellings and 193 build-to-sell dwellings to accommodate the growing population of the Strathfield LGA and Greater Sydney Region more broadly; • It promotes the orderly and economic use of land by redeveloping an underutilised site to facilitate the highest and best use, providing housing in a highly accessible location; • It embeds ESD principles through a range of design and operation initiatives; • It does not result in any adverse impacts to threatened species or ecological communities, as demonstrated by the granted BDAR Waiver; • It generates employment opportunities during the construction and operational phases; • It incorporates good design and amenity of the built environment, as demonstrated in the Design Report (**Appendix K**); • It does not adversely impact Aboriginal cultural heritage and designing with Country has informed the design to ensure it is built into a celebrated within the Proposal; and • The project team has undertaken consultation and feedback with relevant stakeholders. Section 4.15 of the EP&A Act requires the consent authority to take into consideration a number of matters in determining a Development Application. For further discussion, refer to the Statutory Compliance Table (**Appendix C**).
Environmental Planning & Assessment Regulations 2021	Part 8, Division 5 of the EP&A Regulation sets out procedures which relate to the preparation and submission of EISs. This EIS has been prepared in accordance with Division 5 of the EP&A Regulation, as outlined in the Statutory Compliance Table (**Appendix C**).
State Environmental Planning Policy (Housing) 2021	Chapter 2, Part 2 of the Housing SEPP applies to the development for the purposes of in-fill affordable housing. Under the Housing SEPP, a bonus of up to 30% additional height and FSR is available, proportionate to double the percentage of up to 15% of GFA provided as affordable housing. The Proposal is eligible for a 30% additional height and FSR bonus as 15% of GFA is provided as affordable housing. The Proposal aligns with the Housing SEPP, delivering a 15.35% affordable housing contribution through the provision of 35 affordable housing dwellings within the total of 228 dwellings. In accordance with Chapter 2, Part 2, Division 1 of Housing SEPP, the Proposal is eligible and utilises a 30% HOB and FSR bonus above the existing planning controls for the Site. The affordable housing dwellings will be managed by Strathfield Partners, a registered Community Housing Provider (CHP) (refer to **Appendix GG**), for a period of at least 15 years.
State Environmental Planning Policy (Sustainable Buildings) 2022	The NSW Government is committed to developing sustainable and resilient homes and buildings and bringing NSW closer to net zero emissions. As such, the Sustainable Buildings SEPP came into effect on 1 October 2023. The Sustainable Buildings SEPP encourages the design and delivery of more sustainable buildings across NSW. It sets out sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials. The relevant standards for BASIX buildings relate to energy and water usage and thermal performance. An ESD Report is provided at **Appendix W** and outlines the initiatives of the Proposal to ensure that it achieves a high level of sustainability and contributes to NSW's target of net zero emissions by 2050. It is supported by NatHERS and BASIX Certification (**Appendix Z**) and Section J Assessment (**Appendix X**).
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 2 of *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (Biodiversity and Conservation SEPP) details provisions regarding the preservation and management of vegetation in non-rural areas. Since the Site is zoned MU1 Mixed-Use and is located within the Strathfield LGA, the provisions of this chapter apply. While the Proposal will require the removal of twenty-six (26) trees, it is noted that most trees being removed have a low retention value and provide low amenity. In order to offset the

Legislation	Matters for Consideration	
	removal, replacement trees are proposed along Albert Road and Pilgrim Avenue. For further discussion, refer to **Section 6.12** and the Arboricultural Impact Assessment (**Appendix V**).	
Strathfield Local Environmental Plan 2012	***Clause 2.3*** *Zone Objectives and Land Use Table*	The Site is zoned MU1 Mixed-Use where the Proposal is identified as permissible with consent. It is also consistent with the objectives of the MU1 zone in that: • It assists in delivery housing supply to meet the housing demands of the community within a high-density residential environment; • It provides a variety of housing types and sizes along with the delivery of affordable housing; • It improves the amenity of the surrounding area, as it: - Provides a high level of landscaping within the Site and deep soil zone along the street edge; - Provides a contextually appropriate interface to the surrounding heritage items through a considered podium design and articulation and sympathetic materiality; - Provides amenities for the day-to-day needs of the residents including a dedicated communal facilities space; - Will not result in any unacceptable overshadowing, view loss or visual impacts; and - Will have an acceptable traffic and parking impact on the surrounding road network. development. • It provides two (2) commercial tenancies at the ground plane to support activation and services for the local community; • It will ensure that a high level of residential amenity is achieved and maintained by providing compliant solar access, natural ventilation, landscaping and communal open space within the development, and maintaining solar access to surrounding developments.
	Clause 4.3 *Height*	The Site is identified as comprising a maximum HOB of 54m on the Height of Buildings Map under the Strathfield LEP 2012 (refer to **Figure 27** below). The Proposal includes a building height of 70.2m and therefore proposes to vary the HOB development standard. However, the Proposal delivers a 15.35% affordable housing contribution through the provision of 35 affordable housing dwellings within the total of 228 dwellings. In accordance with Chapter 2, Part 2, Division 1 of Housing SEPP, the Proposal is eligible and utilises a 30% HOB bonus above the existing planning controls for the Site, which results in a revised height limit of 70.2m. The proposal complies with this.

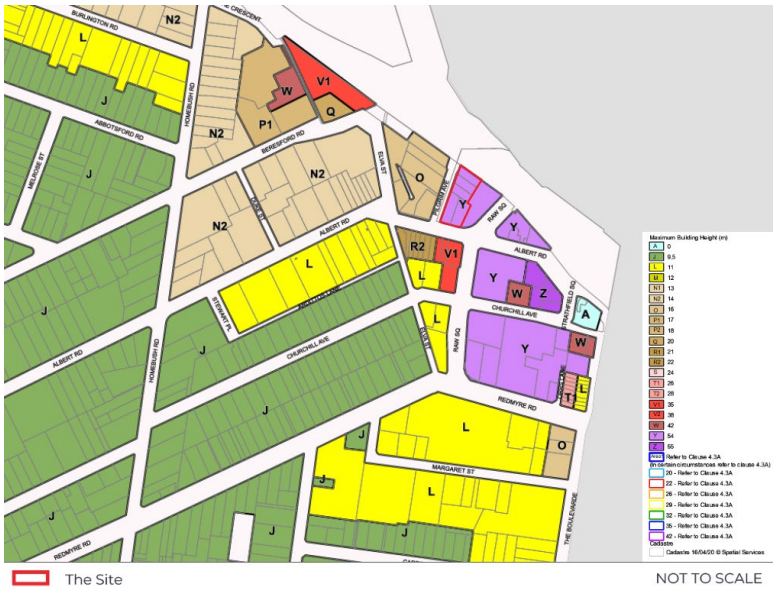
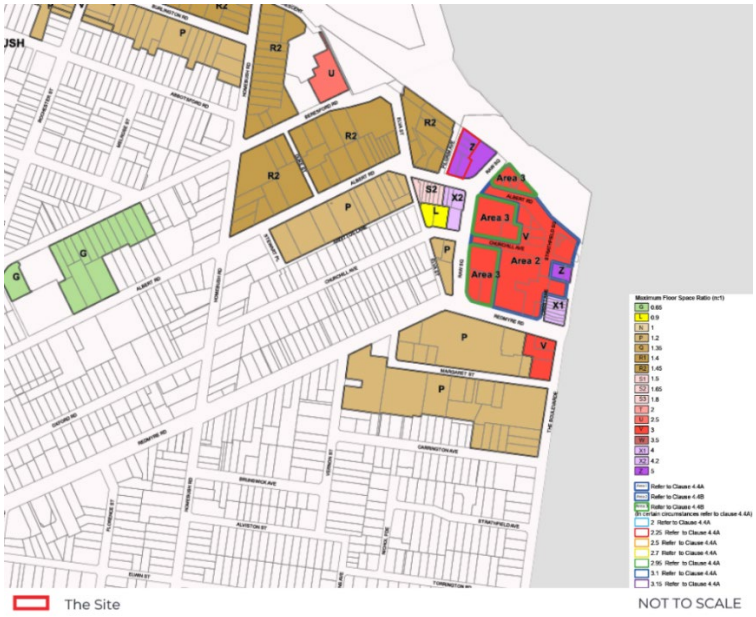


Figure 27 Height of Buildings Map

Source: Strathfield Local Environment Plan 2012

Legislation	Matters for Consideration	
	Clause 4.4 *Floor Space Ratio*	The Site is identified as comprising a maximum FSR of 5:1 on the Floor Space Ratio Map under the Strathfield LEP 2012 (refer to **Figure 28** below). As per Clause 16(1) of the Housing SEPP, the site is subject to an additional 30% floor space above the 5:1 FSR standard in the Strathfield LEP 2012. This results in a total permissible FSR of 6.5:1, equating to a maximum gross floor area (GFA) of 18,642m². The proposed development provides a total GFA of 19,497m², representing an FSR of 6.8:1. The additional 855m² of GFA is attributed to the wintergardens which have a total GFA of 873 m². This results in an exceedance of the maximum FSR development standard by 0.3:1, or approximately 4.6%. Refer to the Clause 4.6 Variation in **Appendix J.**  ***Figure 28 Strathfield Floor Space Ratio Map*** Source: Strathfield Local Environmental Plan 2012
	Clause 5.10 *Heritage Conservation*	The Site is not identified as a heritage item, nor is it located within a heritage conservation zone. Notwithstanding this, it is noted that the Site is within the vicinity of several heritage items. A Heritage Impact Assessment has not been pursed for this SSDA due to it not having any adverse effect on surrounding heritage items. For further discussion, refer to **Section 6.18**.
	Clause 5.21 Flood Planning	The Flood Risk Assessment (**Appendix CC**) has considered the requirement to address flood planning matters at the Site. The assessment indicates that overall flood risk to the Site will be reduced through redevelopment, and that the development will achieve the relevant flood planning requirements. For further discussion, refer to **Section 6.15**.
	Clause 6.1 *Acid Sulfate Soils*	The Strathfield LEP 2012 identifies the Site comprising Class 5 acid sulfate soils. Development consent is required for the carrying out of works within 500m of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum (AHD) and by which the water table is likely to be lowered below 1 metre AHD on adjacent Class 1, 2, 3 or 4 land. The Site is not located within 500m of Class 1, 2, 3 or 4 land.
	Clause 6.2 *Earthworks*	The Geotechnical Assessment provided at **Appendix S** assesses the preliminary design based on earthworks including excavation, vibration and excavation support. The Proposal complies with Clause 6.2 as the Geotechnical Assessment demonstrates that subject to adopting appropriate methods and equipment, the Proposal will not have a detrimental impact on environmental functions and processes or neighbouring uses.

5.0 Stakeholder Engagement

This section describes consultation undertaken and feedback received prior to the lodgement of the EIS for the Proposal and engagement to be carried out following lodgement of the EIS. During the preparation of the EIS, community consultation has been undertaken by The Social Aspect to support the input from stakeholder during the design phase and preparation of the Social Impact Assessment (SIA) (**Appendix BB**).

A summary of the stakeholder engagement undertaken is summarised in the following sections and is supported by the Stakeholder Engagement Table included at **Appendix D**.

5.1 Engagement Carried Out

5.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout during the preparation of the EIS process was developed through:

- The identification of neighbours who would be impacted by the Proposal unless mitigation measures were implemented;
- The identification of stakeholders who would have a particular interest in the Proposal;
- The identification of stakeholders who would have information of value to the Proposal, for example, Aboriginal groups with cultural knowledge relating to the Site; and
- Consultation with DPHI, with consideration for the engagement requirements in the SEARs for SSD-80432461.

As a result of the above process, a number of stakeholders were identified for engagement during the preparation of the EIS, including:

- NSW Department of Planning, Housing and Infrastructure;
- NSW State Design Review Panel;
- Strathfield Council;
- Transport for NSW;
- Sydney Water Corporation;
- NSW Environment Protection Authority (EPA);
- NSW State Emergency Services;
- Aboriginal groups, including the Metropolitan LALC;
- Community and surrounding residents and landowners, including:
  - Residents immediately adjacent to the project site (on Albert Road, Pilgrim Avenue and Raw Square); and
  - Residents in the broader social locality.
- Surrounding businesses and groups, including:
  - Belle Property Group;
  - Strathfield Eye Care / Dental Care;
  - Askew Williams and Associates;
  - Bendigo Bank;
  - Ilmare Restaurant;
  - Shell Coles Strathfield;
  - Strathfield Plaza Centre Management;
  - Woolworths Strathfield Square;
  - Strathfield medical centre; and
  - Strathfield family medical centre.
- Surrounding place of worship, including:
  - Strathfield Kingdom Hall of Jehovah's Witnesses;
  - St Peter and Paul Russian Cathedral;
  - St Annes Anglican Church;

  - Sydney Chinese Seventh Day Adventist;
  - Maronite Church of Australia;
  - Daughters of Saint Paul; and
  - St Martha's Catholic Church.
- Surrounding educational institutions, including:
  - Pre-uni New Colleges;
  - Meriden School;
  - Trinity Grammar School;
  - Santa Sabina College;
  - Strathfield Public School;
  - St. Anne's Catholic Primary School;
  - The King's School Early Learning Centre;
  - Strathfield Girls High School;
  - St. Patrick's College Strathfield;
  - Sydney Technical High School;
  - Australian Catholic University (ACU) Strathfield Campus; and
  - Tafe NSW – Strathfield Campus.
- Surrounding community interest and special interest groups, including
  - The Russian Club;
  - Chinese Australian Services Society;
  - Australian Korean Welfare Association; and
  - Strathfield chamber of commerce.
- Surrounding aged care facilities, including:
  - Strathfield Care Centre;
  - Columbia Aged Care - Strathdale Centre;
  - The Strathfield Nursing Home;
  - Bupa Strathfield;
  - Allambie Heights Care Centre;
  - Regis Strathfield;
  - Southern Cross Care – Morningside Aged Care;
  - The Willows Aged Care; and
  - Anglicare – St Andrew's Village.

5.1.2 Consultation Methods

As detailed in the SIA (**Appendix BB**), a range of consultation methods were used to engage stakeholders. This included activities completed prior to lodgement, through the preparation of the EIS and associated technical studies. The consultation methods are detailed in the table below.

Table 16 Consultation Methods

Activity	Targeted Stakeholder	Purpose
Scoping meeting with project team	All potential stakeholders	• Understand the project, the Site location, and its local context • Determine the engagement and consultation activities conducted by Convertia Pty Ltd (both in the past and proposed) • Describe the research methodologies forming part of the SIA • Discuss the social locality development and the potential for cumulative social impacts • Identify and analyse stakeholders • Identify and discuss existing project correspondence.

Activity	Targeted Stakeholder	Purpose
Desktop and literature review	Potential stakeholders affected by development.	• Media and web search for prominent social issues in the Strathfield LGA • Review of social media posted to the "Strathfield Ratepayers Association" and "Our Strathfield" Facebook pages, in additional to an online media search • Social and economic assessment reports of other major projects exhibited on the NSW DPHI major projects website • Relevant technical studies commissioned for the EIS.
Site visit an observational analysis	All people who interact in close proximity to the Site.	To analyse the social infrastructure and human behaviour near the project Site.
Project introduction letter	Non-English speaking language groups in Strathfield.	• Introduce Convertia Pty Ltd to the surrounding community • Provide preliminary details about the project • Invite feedback about the project • Provide contact details for future correspondence.
Online survey	Local community.	To explore community sentiment towards the project in Strathfield. It sought to identify sentiment and determine the social challenges and opportunities in the suburb.
Direct consultation	Adjacent residential neighbours and business representatives.	The doorknock aimed to provide a description of the project and collect qualitative, open-ended data, outlining the participants understanding and feelings towards the project.
Stakeholder meeting invitations	Strathfield chamber of commerce, Metropolitan Local Aboriginal Land Council (LALC) and Strathfield Council.	To introduce the project, identify potential social risks, invite feedback and establish a dialogue for the duration of the EIS.
Community information session	Current and future community if Strathfield.	The session was designed to provide and collect feedback and opinions about the project.

Source: The Social Aspect

This approach follows the *Undertaking Engagement Guidelines for State Significant Projects* (2021) by:

- Engaging with relevant NSW Government agencies, service providers, Council, close neighbours and targeted members of the community who are most likely impacted or interested in the Proposal;
- Informing the surrounding community to the Site about the Proposal and providing opportunities to engage directly with the project team;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be readily understood; and
- Providing channels of communication to gather feedback.

5.1.3 Aboriginal Community Consultation

Consultation was undertaken with Aboriginal groups in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* as part of an Aboriginal and Cultural Heritage Assessment Report (ACHAR) prepared by AMAC Archaeological and included at **Appendix DD**.

A list of 64 registered stakeholders was provided by Heritage NSW. No additional registered groups were provided by additional authorities or responded to the advertisement. Project information and requests for expression of interest were sent on 15 July 2024. Nine groups responded. All registered stakeholders were given a copy of the proposed Aboriginal Cultural Heritage Research Methodology with 28 days to respond. One group responded, supporting the proposed methodology.

All registered stakeholders have been provided a copy of this report and given a minimum of 28 days to review and comment. No comments were received, and the final ACHAR is included at **Appendix DD**.

5.1.4 SEARs Required Engagement

Engagement Item No. 4 of the SEARs requires agency consultation should the development require approval or authorisation under another Act but for the application of s4.41 and s4.42 of the EPA&A Act. Subsequent letters were sent via email on 25 March 2025 and 26 March 2025 to Transport for NSW, Sydney Trains, Water NSW and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) inviting them for consultation. Responses were received from Sydney Trains, Sydney Water and DCCEEW as outlined below. No response was received from Transport for NSW.

Sydney Trains

Sydney Trains responded with a meeting request that was subsequently held on 3 April 2025. The meeting attendees included two representatives from Sydney Trains, two project architects from Steve Kennedy Associates and the project town planner from Ethos Urban.

The meeting focused on excavation and basement design matters, including the proposed 6m setback to accommodate shoring and anchoring within the site boundary and avoid encroachment. Key considerations such as embankment stabilisation, excavation depth, crane positioning, and coordination with Sydney Trains for structural and geotechnical documentation were also discussed. It was noted that many of the detailed design and technical requirements raised will be addressed and resolved through the preparation of Construction Certificate stage documentation.

Water NSW

Email correspondence was received on 26 March 2025 from Water NSW who advised that their Operating Licence excludes them from dealing with state significant developments for Sections 89 (Water Use) and 92 (Approvals) under the Water Management Act 200. They subsequently provided contact details for DCCEEW as the relevant authority for the consultation request.

DCCEEW

Email correspondence was received on 9 April 2025 from DCCEEW providing a copy of their standard input to SEARs for SSD and SSI projects. This included assessment requirements and relevant policies, guidelines, and legislation relating to water take and licensing, water impacts, and general water-related considerations. Further detail and an assessment of the proposal against the applicable water requirements are provided in the Integrated Water Management Plan at **Appendix R**.

It is therefore considered that the engagement requirements under the SEARs have been satisfied.

5.2 Stakeholder Views

The key issues and matters raised by the community and stakeholders during the preparation of the Scoping Report, SEARs and EIS are outlined in **Table 17** below.

Table 17 Stakeholder Views

Question	ID	Stakeholder Responses
What do you value about living or working in Strathfield?	1	Convenience of a major train station and short distance to major shopping centre in Burwood.
	2	Proximity to a major railway station and the vibrancy of the small CBD there
	3	Great public transport connections.
	4	Easy/close access to the small shopping centre known as Strathfield Plaza, & only a short distance to Westfield Burwood, a much larger shopping centre. "
	5	Good infrastructure. Close proximity to transport and central location. My mother lived in Strathfield for over 30 years and enjoyed living there. The area around my mother's unit deteriorated quite significantly over the time she lived there and a lot of the dwellings are very dilapidated.
	6	Diversity, access to PT, and facilities.
What benefits (if any) would a new residential	1	Lower housing prices, lower rent prices. Better housing quality. More shops, offices and employment opportunities.

Question	ID	Stakeholder Responses
and commercial development in Strathfield create for people living in the area? Please provide details.	2	More business to the area
	3	It may potentially give me the opportunity to upgrade from my existing apartment in Strathfield, to a newer apartment in Strathfield.
	4	My siblings and I believe that the particular precinct under the development application is rundown and would definitely benefit from a revitalisation plan.
	5	Negative impact on noise and vibration, traffic and transport, visual amenities, social density overshadowing on neighbouring properties.
	6	It would upgrade and improve the status of Strathfield, which over the years has become quite run down in areas.
What challenges (if any) would a development like this create in the area? Please provide details.	1	Pedestrian and vehicle congestion at intersection of Raw Sq and Albert Road.
	2	The flow of vehicles is a huge concern with a tall building going into and already busy and congested intersection. The side street Pilgrim is extremely narrow and (currently) cars can park there
	3	At the moment, I can't think of any challenges that couldn't be overcome.
	4	Increased population in the area would put pressure on existing infrastructure, including transport both public and private as well as amenities (shopping), schools etc.
	5	Increased congestion and lower quality of living for the community.
	6	Traffic chaos as it is already very difficult to exit and enter Pilgrim Ave. Look at any shading a building this height would having on letting light into existing buildings surrounding the proposed development.
How can Convertia Pty Ltd ensure the proposed development creates a positive influence for the people living and working in the area?	1	More public parking spots. Somehow build a bridge over raw sq to provide residents direct access to Strathfield Station and shopping plaza. More commercial space. Quality apartments and more of them with a well run strata.
	2	Advise how the vehicles will be managed in and out of the new building and the entry / exit points. This is not clear on the info sheet sent
	3	Increase the number of residential car parking spaces in the building. For example, if I bought into the property, I would need two adjacent secure car parking spaces.
	4	Supply adequate underground parking for residents and visitor parking within the new precinct. Adequate lighting and signage should be considered for security purposes. Other infrastructure such as child care, schools, hospitals should also be considered.
	5	Reduce density, consider neighbouring properties, traffic and access as well as noise and vibration.
	6	Make it a priority to address all traffic conditions. Provide green space. Encourage further development of old and run down buildings opposite the Site.
Do you have any concerns about the proposed development based on the information provided in the survey introduction?	1	No
	2	Yes
	3	Yes
	4	No
	5	Yes
	6	No
Please describe your concerns and suggest	1	No Response.
	2	As above re vehicle flow

Question	ID	Stakeholder Responses
how Convertia Pty Ltd could address them	3	I don't have any negative concerns at the moment, but I would appreciate receiving the following additional information/details from you: (1) The proposed number of residential apartments with respectively one bedroom, two bedrooms & three bedrooms, (2) The proposed floor plans, & aspects, of each of these different types of apartments, (3) The proposed security features to be incorporated into the building, (4) The proposed "green" features of the building, including the proposed energy rating of the building, (5) What levels of internet/broadband connectivity will be built into each apartment, (6) What opportunity will there be for buyers to customise various fixtures, fittings, etc, (7) What is the proposed timeline for the development, completion, etc? (8) Besides the communal open space, what other communal facilities will there be?
	4	No response.
	5	Justify density and huge extent of development with compounding impacts on neighbours and surrounding community.
	6	No response.

Source: The Social Aspect

5.3 Engagement to be Carried Out

The project team are committed to ongoing community consultation following the submission of the EIS. This includes during the exhibition and assessment of the project and following a determination.

Following its submission, the DPHI will exhibit the EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, the DPHI may require the applicant to prepare a Submissions Report in response to issues raised. The project team will continue to liaise with the DPHI and stakeholders during the Proposal's assessment to address queries that may arise.

6.0 Assessment of Impacts

This section assesses and responds to the potential environmental impacts of the Proposal. Specifically, it addresses the matters for consideration set out in the SEARs (see **Appendix A**). It also outlines any mitigation measures proposed to mitigate any environmental impacts with a consolidated list provided at **Appendix E**.

6.1 Design Quality

Clause 6.7 of the Strathfield LEP 2012 includes design excellence requirements for the erection of a new building on land identified as 'Area 2' within the Strathfield Town Centre on the Floor Space Ratio Map. The Site is not identified within 'Area 2' and the Clause 6.7 of the Strathfield LEP 2012 is not applicable to the Site.

The Proposal was reviewed by the State Design Review Panel (SDRP) with the project team presenting to the SDRP on 20 November 2024. The SDRP provided formal advice to the Applicant on 29 November 2024, outlining the following elements are supported and should be maintained as the design develops:

- The orientation and allocation of building massing to achieve increased density while maintaining residential amenity and architectural quality. The provision of 35 affordable housing units;
- The approach to ensure adequate separation between buildings to preserve privacy, improve solar access, and create a balanced urban composition;
- The considered approach to integrating landscape elements across multiple levels of the building;
- The proportional increase of communal areas that provide a diverse program and integrate accessibility considerations; and
- The forward planning to allow integration with potential development in the site to the east, including allowance for future access, connections and integration of landscape areas.

Further, the SDRP also provided formal advice and recommendations which is provided in **Table 18** below and includes the project team's response.

Table 18 Response to State Design Review Panel Feedback

Comment	Response
Connecting with Country	
1. Ensure principles of Connecting with Country are authentically integrated into the architectural and landscape elements of the proposal.	The program for integration of Connecting with Country into the project is based on three (3) core elements of the development: • **Awning** – the ground level colonnade; • **Arm & Hand** – the five storey, cantilevered arm & hand supporting the upper portion of Building P; and • **Landscape** – the landscape design. The first two (2) elements, which are located within the private / public interface of the development, will be highly visible and will be in locations that all residents will interact with them, whilst the landscape design permeates the entire project at podium level. For detailed discussion on the Connecting with Country response, refer to Section 5 of the Design Report prepared by Kennedy Associate Architects included at **Appendix K**.
2. Refer to the Connecting with Country Framework and case studies on the GANSW website for more information and guidance.	
Site Strategy and Landscape	
3. Demonstrate compliance with wind comfort criteria particularly at the ground level and communal spaces. Ensure wind mitigation is achieved through the building form and articulation rather than through features un the public and open spaces.	The Pedestrian Wind Environment Study (**Appendix L**) prepared by Windtech confirms that wind conditions in trafficable outdoor areas within and around the development will be suitable for their intended use. Wind mitigation is effectively addressed through the building's form and articulation, without reliance on additional features in the public and open areas, ensuring compliance with wind comfort criteria particularly at ground level and in communal spaces.
4. Demonstrate compliance with acoustic protection.	The Acoustic Report (**Appendix Q**) prepared by Acoustic Noise & Vibration Solutions confirms that the Proposal will comply with all relevant noise and

Comment	Response
	acoustic standards, including those outlined in Transport and Infrastructure SEPP, AS/NZS 2107 and Strathfield Council regulations. The Report has made a number of recommendations regarding noise mitigation, all of which have been implemented ensuring compliance with noise protection requirements and effectively managing noise impacts to and from the building.
5. *Review and refine the building entrances and sequence of arrival to provide a human scale, legibility and ease of wayfinding.*	The ground level of the proposed development has undergone considerable further development since the SDRP presentation, including the entrances of both buildings as well as wayfinding and access to services such as mail and bike parking. Having two street frontages, the development has been designed to ensure equality of entry and access, balancing the size and scale of the development (potentially over 500 residents) with both human scale and a clear, legible, spacious and inviting arrival sequence. The suspended awning connects and integrates the entries, clearly announcing and identifying each entry and integrating them with the colonnade and commercial space, creating an engaging and inviting experience within the public domain. The awning, with its serpentine shape, will form part of the Connecting with Country strategy. Pilgrim Avenue is being reconstructed to provide a tree-lined, boulevard and forecourt to the development.
6. *Consider how access ramps can be utilised as an integral element to the arrival sequence.*	The centrally located ramp has been redesigned to not only integrate with the ground level spaces but to actively mediate between the street and raised colonnade helping form and identify the public spaces. It has evolved into a boomerang type shape which, whilst still practical and coherent, becomes part of the space of the building offering a visually engaging experience that enriches the journey of arrival at the development. It is both highly visible and inviting. The inclusion of planters, seating, and awnings enhance the experience.
7. *Maximise tree planting in between parking spaces along Pilgrim Avenue*	The project design reconstructs the eastern side of Pilgrim Avenue and introduces a series of substantial planted verges whilst delivering drop off space, short term parking and bike parking. The footpath on the eastern side of Pilgrim Avenue will be widened and repaved creating an integrated and seamless public frontage to the development. Planting has been designed to create a generous avenue of trees encircling the building. Planters are located at both ground and colonnade level within the building, addressing and mediating the 1m level change required for flood mitigation.
8. *Demonstrate appropriate growing condition for planted areas proposed on structure.*	The landscape design incorporates both deep soil street planting at ground level and a series of planters at Levels 00, 01, 04 and 05. Planters are both generous in width (varying from nominally 1m to over 6m) and soil depth (varying from 600mm to over 2m in depth). The species selection, which is predominantly native and indigenous, has been selected both for it suitability to the Site (including both location and planter size) and to ensure the development delivers a successful, convincing, varied and beautiful landscape setting and character.
9. *Ensure the public art is proportionate to the overall building composition and role and will constitute and enduring legacy.*	The program for public art forms part of and is integral with the program for Connecting With Country, being the treatment of the ground level colonnade and the six storey, cantilevered arm & hand supporting the upper portion of Building P. Both elements are located within the private / public interface of the development, will be highly visible and will be in locations that all residents, as well as the broader public, will interact with them on a regular basis.
Architecture	
10. *Refine the design of the facades to improve material variation and visual interest.*	The design has been significantly refined over recent months, since the SDRP presentation. Considerable work has gone into developing and refining the various elements of the design to ensure both the overall composition and

Comment	Response
	individual elements are cohesive and convincing, whilst maintaining the rigour, discipline and singularity of the architecture. In particular, Building P has been substantially redesigned, Including changes to its massing and façade treatment: • The language of the four-storey podium addressing the corner of Albert Road and Pilgrim Avenue has been carried through to the five-storey component of Building P fronting the rail corridor • The northern end of building has been reconsidered with a more refined and legible expression of the wintergardens. • Concrete spandrels fronting the railway line have been replaced with a combination of floor-to-ceiling louvred glazing and projecting slab edges, providing a more coherent design with improved internal outlook. Building A has undergone similar refinement including its façade treatment and street address, particularly with reference to the glazed fire stairs, colonnade and building entry. The palette of materials has been refined and the interplay of curved and rectilinear forms has been developed to deliver a clearly understood composition delivering visual honesty and clarity, as well as delight. Maintaining the integrity and coherence of the three dimensional character of the development, with 4 clearly defined 'faces' has remined central to the architectural response.
11. Refine how the building meets the ground to create quality public-private interfaces and urban amenity.	The ground level of the proposed development has undergone considerable further development, including the entrances and street presentation of both buildings. Each building reflects its specific location. The entrance to Building A, being on a busy, noisy and relatively hostile road adjacent a petrol station, is recessed and calming. The entrance to Building P, being at the end of Pilgrim Avenue and in a relatively quiet and obscure location, is outgoing and engaging. The reworking of Pilgrim Ave at street level and ground level colonnade, plus and the integration of landscape, strengthens the quality of human scale of the project.
12. Further Develop the interface with commercial spaces at the ground	The design provides 250m^2 of commercial space at ground level, located within the colonnade connecting Building A and Building P. The space is suitable for a variety of configurations and uses including from one to three tenancies. The tenancies have substantial glass frontages facing the colonnade and with good visibility from the street, particularly Albert Road. This colonnade is expected to be well used by residents, particularly people travelling from Building P to and from Strathfield Station. The mail room is located adjacent the commercial space. The expected population of development will be over 600 people. The area immediately outside the commercial space has been designed to provide good public visibility, especially from Albert Road, as well as seating for both residents and potential café patrons.
Sustainability and Climate Change	
13. As the design develops, ensure sustainability principles remain embedded in both the architectural and operational aspects of the building.	The project has been critiqued throughout the design process to ensure it delivers the best possible outcomes in terms of sustainability and embodied energy. Efficient Living (sustainability consultant) have provided advice throughout the design process and have prepared a report addressing the environmental performance of the building. This process will continue through the ongoing construction documentation and construction phases of the project. Efficient Living's advice has identified construction and operational outcomes for key sustainability measures. The ESD Report (**Appendix W**) identifies that the project will meet, or exceed, its energy targets.
14. Explore the use of construction materials that maintain durability while reducing the projects overall carbon footprint.	An overarching carbon footprint reduction of 20% is a target for the project with a primary focus on reduced embodied carbon emissions through management of concrete use.

Comment	Response
	Exterior materials have been specifically selected for their longevity and low maintenance. Paint and other applied surfaces are largely excluded from the exterior of the building.
15. Illustrate how the project will contribute to NSW's Net Zero emissions goals by 2050. Refer to 'NSW, DPIE, Net Zero Plan, Stage 1: 2020-2030' for further information.	The building has been specified with all electric services, which is the key building block for achieving Net Zero carbon emissions consistent with the NSW Net Zero Plan. This is achieved when the building operator/embedded network operator utilises power from onsite PV arrays and green electricity purchase from the grid as well as occupant willingness to enter into green electricity contracts. Energy efficiency and renewable electricity (from PV array) measures have been included at a minimum to meet BASIX requirements with steps to substantially exceed these standards targeted.

Source: Kennedy Associate Architects

6.2 Built Form and Urban Design

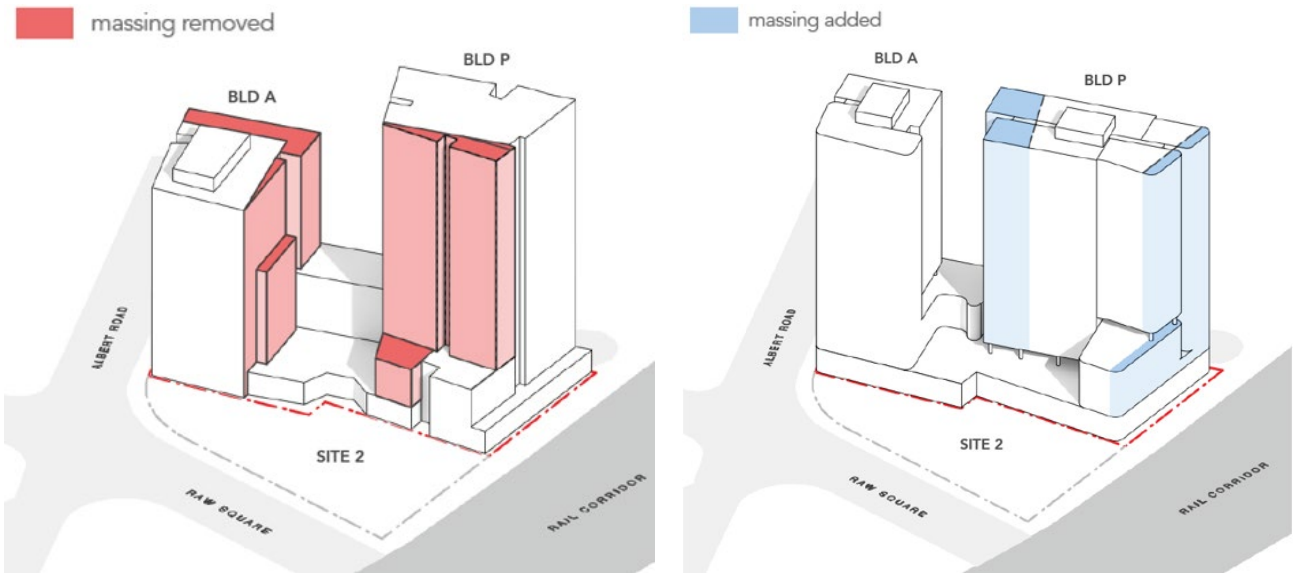
A Design Report has been prepared by Kennedy Associates Architects and is included at **Appendix K**. It provides a detailed description of the design, as well as reasoning and justification behind the proposed design strategy to provide additional supportive detail to the Architectural Drawings (**Appendix B**) and Landscape Drawings (**Appendix I**).

6.2.1 Height, Bulk and Scale

As discussed in **Section 1.4.2**, a Development Application (DA 2020/256) for a compliant scheme was previously approved (subject to deferred commencement) by the Sydney Eastern City Planning Panel (PPSSEC-112) on 30 September 2021. The massing of this approved design is shown in **Figure 29**.

The current Proposal seeks to increase setbacks to the neighbouring site to the east (currently used as a Shell Service Station) noting it may be redeveloped in the future for residential uses. It therefore improves solar access within the Site and neighbouring site by reducing building depth, reducing the frontage to the railway corridor, increasing the residential communal space and reducing the number of south facing dwellings.

A comparison of the horizontal massing adjustments between the approved and proposed scheme is provided in **Figure 29** below.



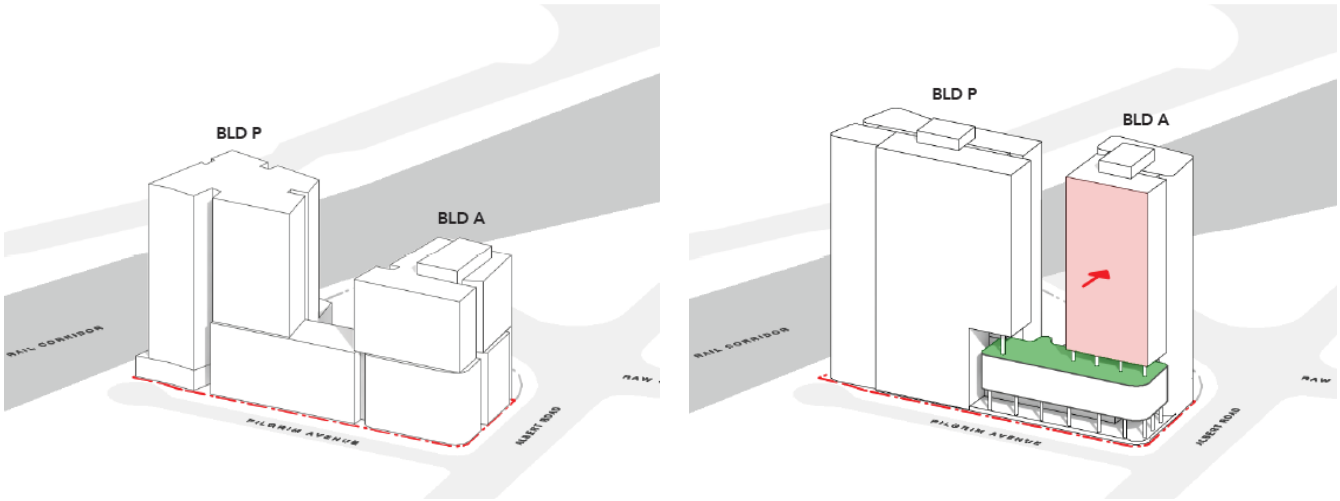
Approved *Proposed*

***Figure 29 Horizontal Massing* Comparison**

Source: Kennedy Associates Architects

The proposed scheme also seeks to alter Building A by increasing setbacks to Pilgrim Avenue for a clearer podium articulation, improving the streetscape, increasing solar access benefits to neighbours' developments and refining communal space.

A comparison of the streetscape adjustments between the approved and proposed scheme is provided in **Figure 30** below.



Approved

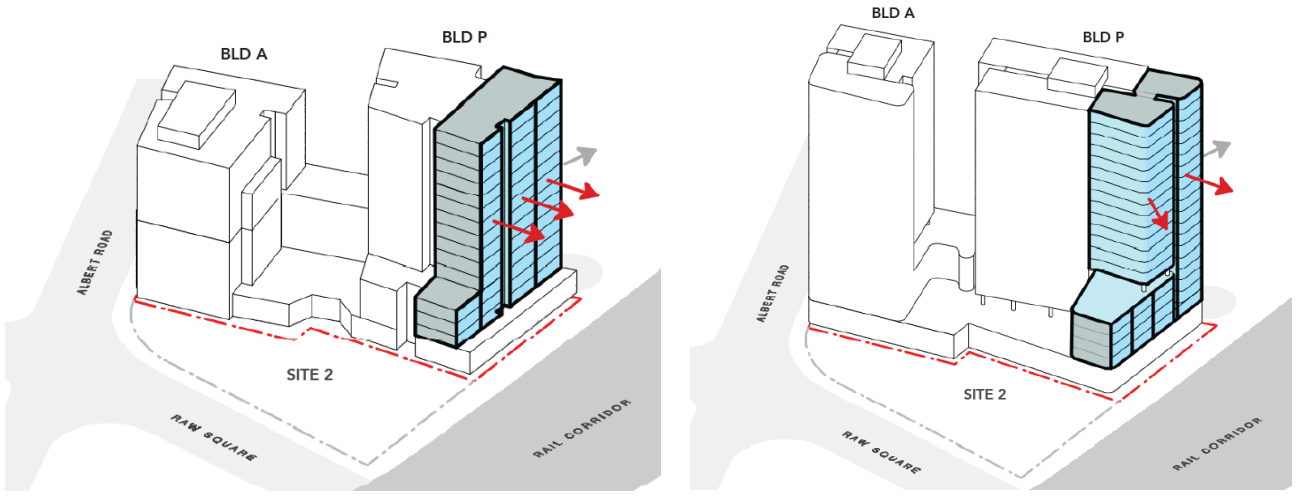
Proposed

Figure 30 Streetscape Comparison

Source: Kennedy Associates Architects

The approved scheme saw the typical upper floor plan having three (3) north facing units overlooking the rail corridor. In comparison, the typical floor plan of the proposed scheme has been reworked to minimise the number of units facing the rail corridor and maximise outlook from dual aspect units. Wintergardens are proposed to units facing the rail corridor to address anti-throw requirements and provide acoustic amenity.

A comparison of the railway corridor adjustments between the approved and proposed scheme is provided in **Figure 31** below.



Approved

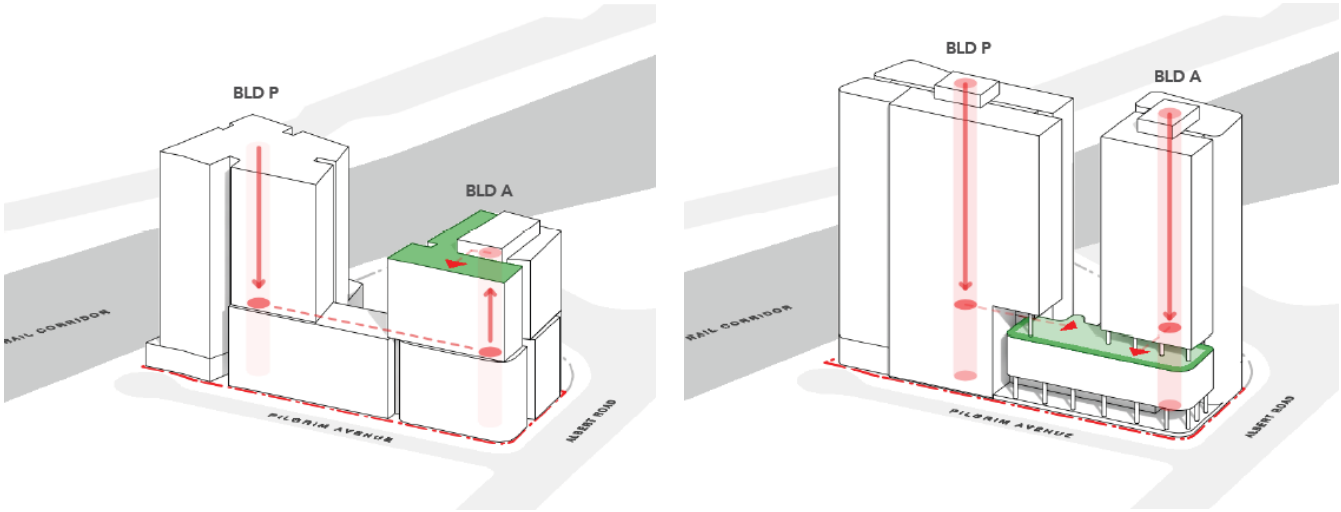
Proposed

Figure 31 Railway Corridor Comparison

Source: Kennedy Associates Architects

The Principal Communal Open Space (PCOS) in the approved scheme is located on the roof top of Building A; access from Building P to the PCOS is indirect and not ideal. The PCOS in the proposed scheme is located at podium level. The proposed scheme offers improved, equitable access to the PCOS and is easily accessible via both lift cores.

A comparison of the communal open space adjustments between the approved and proposed scheme is provided in **Figure 32** below.



Approved

Proposed

Figure 32 Communal Open Space Comparison

Source: Kennedy Associates Architects

6.2.2 Layout

Ground Floor and Podium

The ground level comprises two (2) commercial tenancies, building amenities and pedestrian and vehicle access. It has been designed to provide high quality street activation in the Strathfield Town Centre with ample covered outdoor seating and carefully thought-out landscaping to provide an intimate dining experience.

An upgraded Albert Road and Pilgrim Avenue streetscape will deliver a strong paving scheme that guides pedestrians to the entry, landscaping will be characterised by low maintenance and drought tolerant native plantings and all new street trees will contribute to shading and scale of the streetscape.

A designated short-stay parking near the entry to accommodate drop-offs, allowing for quick access to the building without obstructing traffic or pedestrians and spaces for bike parking for the commercial shops.

An overview of the proposed improvements to the public realm along Pilgrim Avenue and Abert Road include:

- Remaking and widening of the footpath along the eastern side of Pilgrim Avenue;
- Provision of short-term parking spaces, vehicular drop off and motor and push bike parking along Pilgrim Avenue;
- Provision of series of large deep soil planters along the street verge of Pilgrim Avenue;
- Integration of the street frontage within the overall landscape design of the development;
- Planting of an avenue of street trees along both Pilgrim Avenue and Albert Road;
- Provision of public seating along Pilgrim Avenue;
- Provision of a series of generous stairs within the building along its street frontages connecting the footpath to both Albert Road and Pilgrim Avenue;
- Provision of a public colonnade connecting both buildings and providing access to the commercial space from both Albert Road and Pilgrim Avenue;
- Provision of a series of stepped planters along both street frontages connecting the colonnade to the footpath on both Albert Road and Pilgrim Avenue; and
- Provision of a dedicated seating areas within the colonnade for potential café seating.

An indicative visualisation of the public realm is provided in **Figure 33** below.

Figure 33 Visualisation of the Proposed Streetscape along Pilgrim Avenue

Source: Kennedy Associates Architects

Tower

The tower element of the proposed development comprises Levels 6-19 with residential dwellings located on all levels and areas dedicated for an A/C condenser plant on the roof. To address the solar access impacts of the development, the building has been broken up into two (2) main tower elements, Building A exists on the southern side of the Site and Building P on the north. This allows for sensitive receivers on the east and west of the Site to receive sunlight and more units to receive solar access.

The layout of Levels 6-19 will have a consistent floorplan of twelve (12) dwellings per floor with associated building amenities. The tower floorplate is efficient in its layout and seeks to maximise privacy and amenity for residents. The breakdown per level and the typical tower floor plan is provided in **Figure 34** below.

- Building A:
  - 1 Bedroom – 1 dwelling per floor;
  - 2 Bedroom – 2 dwellings per floor; and
  - 3 Bedroom – 1 dwelling per floor.
- Building P:
  - 1 Bedroom – 2 dwellings per floor; and
  - 2 Bedroom – 6 dwellings per floor.

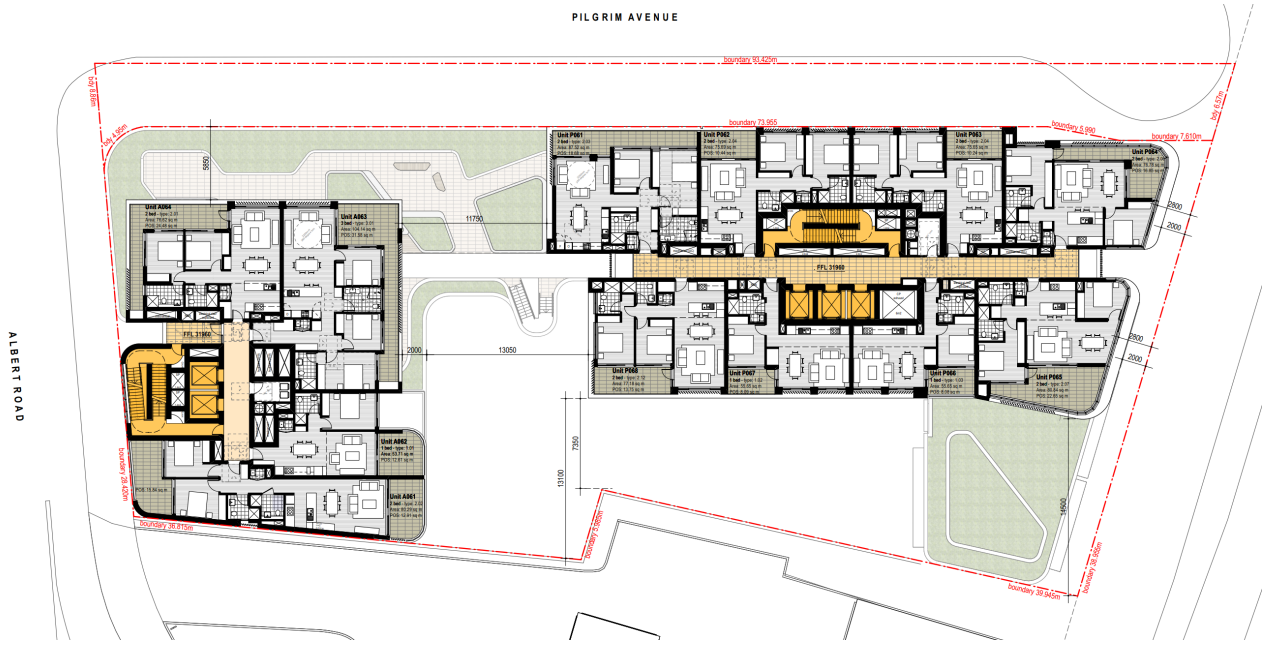


Figure 34 Typical Level 6-19 Floor Plan

Source: Kennedy Associate Architects

6.2.3 Building Separation and Setbacks

The Proposal generally increases the tower setbacks compared with the approved scheme and complies with the ADG, as outlined in Section 4.4 of the Design Report (**Appendix K**) and Statutory Compliance Table (**Appendix C**). It is noted that the internal tower separation has decreased between Building A and P which represents a minor non-compliance with the ADG, with the reduction considered reasonable in this instance for the following reasons:

- The two (2) towers have different orientations, with both having their primary orientation away from each other;
- The southern wall of Building P (where it is opposed to Building A) is primarily blank;
- The only apartment with south facing windows in Building P are at a high level, obscure glazed, secondary windows;
- The balconies of the southern end of Building P have additional screening to ensure privacy to Building A;
- The only units in Building A affected by the proximity to Building P are the northern corner units which:
  - Are dual aspect;
  - Have clear sightlines to the west and north-east;
  - Have significant natural light;
  - Have screening along their side balcony opposite Building P; and
  - The screening does not prevent outlook from any of the habitable rooms in the unit.

6.2.4 Interface and Articulation

Podium

The podium levels of the development have been carefully designed to facilitate a strong interface between the streetscape and building. On the street level, planter boxes of densely planted native shrubs and trees will introduce the street to the podium interface. Planter boxes along the boundary walls on Albert Road and Pilgrim Avenue will continue the theme of dense native landscaping providing a seamless transition from public to private space. This relationship between street and podium is depicted in the Landscape Drawings (**Appendix I**).

The podium façade has been articulated to fit a consistent material palette across the development of off form finish concrete and mid bronze powder-coat aluminium. Large off form concrete panels will define the podium level façade as they will be incorporated into the design of the ground floor planter boxes, site entrances and external residential unit walls. Mid-bronze powder-coated aluminium framing, cladding, battens and balustrades will complement the off-form concrete will show articulated façade design across the building.

Tower

The tower component continues on the façade palette from the podium level, with off form finish concrete and mid bronze powder-coat aluminium. The seamless transition from podium levels to the tower component is supported by the carefully considered façade materiality. The design integrates the roof into the overall massing and articulation of the project. This includes inclusion of continuation of the building's articulation and materials palette into the roof design (refer to **Figure 22**)

Figure 35 East Facing Photomontage

Source: Kennedy Associates Architects

6.2.5 Affordable Housing

The affordable housing dwellings are distributed within the podium levels of the building and include 1, 2 and 3 bedroom units. It is proposed that 25% (9) of affordable dwellings will be 1 bedroom, over 70% (25) will be 2 bedroom, and less than 3% (1) will be 3 bedrooms. The units have a variety of configurations and orientations and offer close proximity to communal open space and amenities. The distribution and extent of affordable housing GFA has been centralised across Levels 1-3 allowing for easier management and more affordable strata for the Community Housing Provider. The affordable housing GFA is presented in **Figure 36**, **Figure 37** and **Figure 38** below.

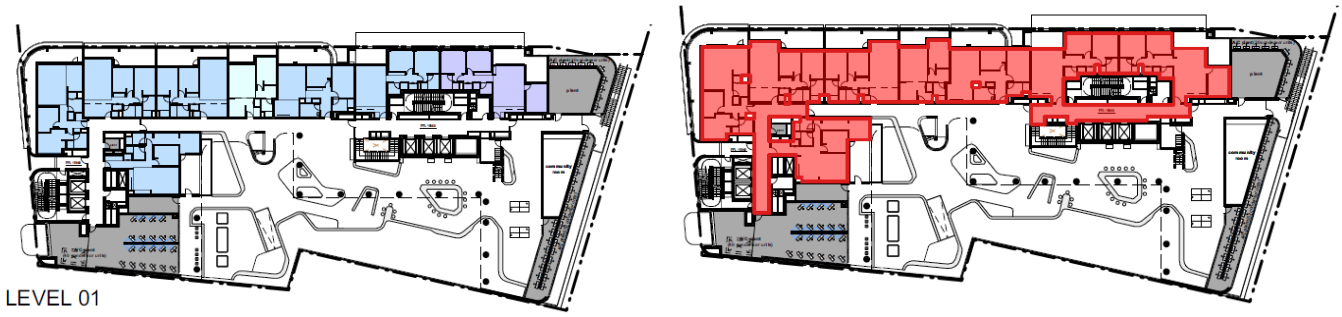


Figure 36 Level 1 Affordable Housing Distribution and GFA

Source: Kennedy Associates Architects

Figure 37 Level 2 Affordable Housing Distribution and GFA

Source: Kennedy Associates Architects

Figure 38 Level 3 Affordable Housing Distribution and GFA

Source: Kennedy Associates Architects

6.2.6 Regulatory Compliance

A BCA Report has been prepared by Credwell and is included at **Appendix M**. It provides an assessment of the Proposal against the Deemed-to-Satisfy (DtS) provisions of the relevant sections of the Building Code of Australia (BCA) 2022 and the applicable Building Regulations. Credwell confirm the proposed development can achieve compliance with the BCA 2022. Compliance is proposed to be achieved by satisfying the relevant DtS provisions and where necessary other aspects of the design may need to be addressed by way of Performance Solutions to meet the relevant Performance Requirements of the BCA. Such solutions proposed will be provided by an Accredited Fire Engineer, an Accredited Access Consultant or a BCA Consultant.

6.2.7 Accessibility

An Access Assessment Report has been prepared by Accessible Building Solutions and is included at **Appendix N**. It assesses the proposed development against the relevant accessibility requirements including The Access provisions of the BCA 2022, The Access To Premises Standard, AS1428 series, BCA, AS2890.6 for car parking, AS1735.12 for lifts AS 4299 Adaptable Housing and the Housing SEPP 2021. Accessible Building Solutions confirms that accessibility requirements, pertaining to external site linkages, building access, common area access, sanitary facilities and parking can be readily achieved.

6.3 Environmental Amenity

6.3.1 Overshadowing

The Proposal complies with the permissible height and density controls. Due to the location of the Site and the height of the Proposal, some overshadowing to surrounding properties occurs. However, the 'tower' form causes shadows to shift quickly, limiting impacts on surrounding properties. Building A is set back from Pilgrim Avenue to minimise overshadowing impacts on adjoining developments. The Proposal will cause direct overshadowing impacts on the residential flat building at 38–40 Albert Road and Regal Court throughout the winter solstice. However, given the urban context, the shadow impacts for the development are considered reasonable.

The shadow diagrams and views from sun diagrams taken during the winter solstice are presented in **Figure 39** and **Figure 40** below respectively.

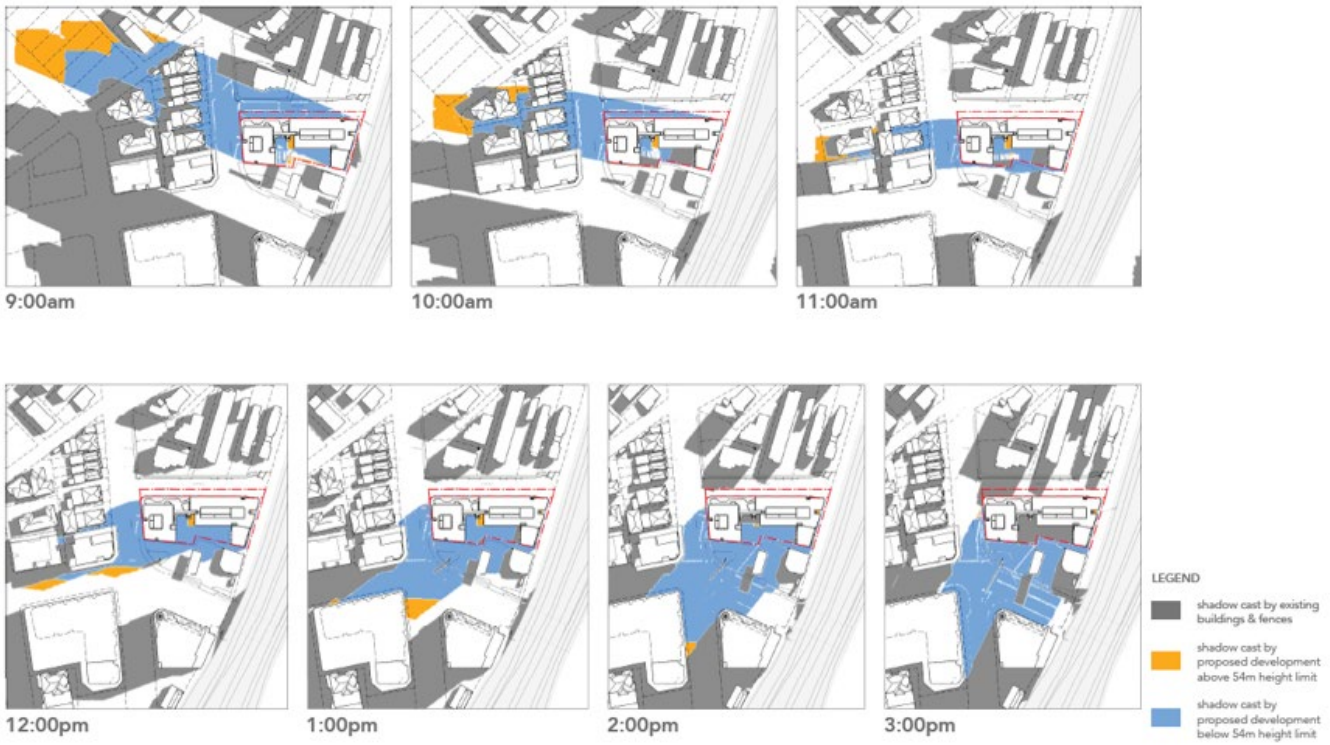


Figure 39 Winter Solstice Shadow Diagrams

Source: Kennedy Associate Architects

Figure 40 Winter Solstice Views from Sun

Source: Kennedy Associates Architects

6.3.2 Visual Privacy

As discussed in the Design Report in **Appendix K**, the methods to mitigate visual privacy impacts between future occupants and neighbouring properties are outlined below:

- Buildings A and P have been designed to maximise outlook and minimise direct lines of sight between units in accordance with the recommendations of the ADG.
- Windows and balconies are strategically placed to reduce overlooking and enhance privacy.
- Unit layouts are designed to provide generous and unencumbered access to light and air.
- The proposed louvres, which are adjustable, are primarily to manage heat load whilst directing outlook.
- The balconies on the southern units at Building P have been provided with additional screening measures to mitigate overlooking and ensure privacy sightlines are minimised to Building A.
- The proposal includes wintergardens at the northern end of Building P to address the anti-throw requirements of Sydney Trains and assist with acoustic privacy from the railway.

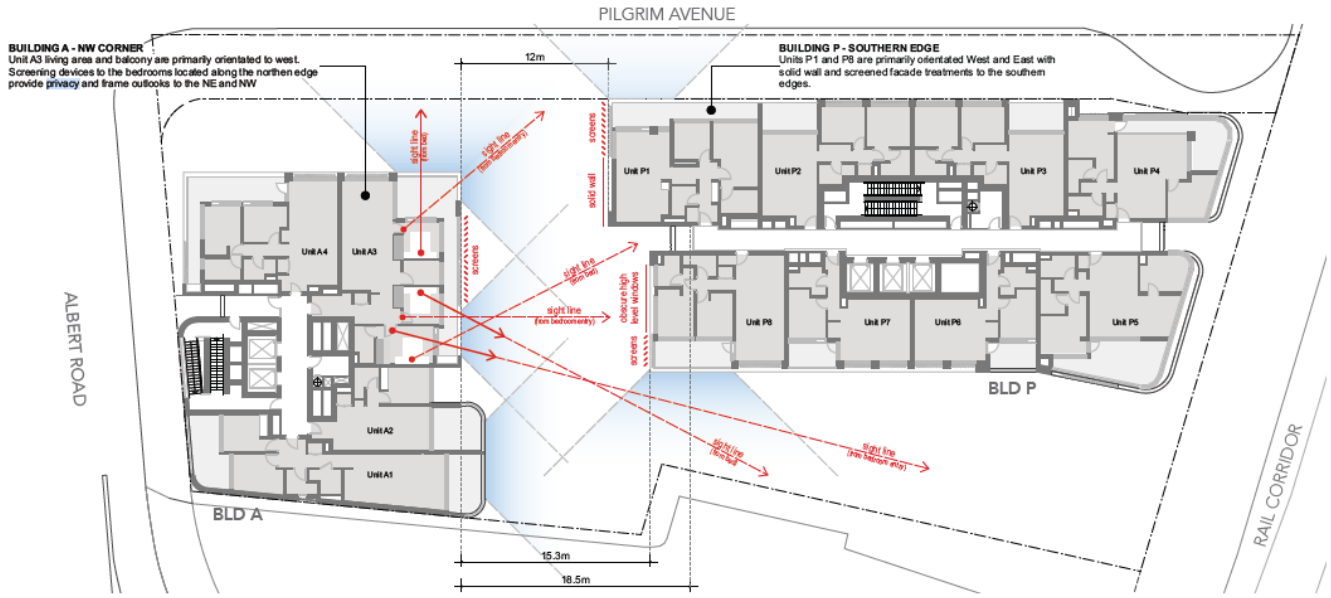


Figure 41 Facade treatment to minimise privacy impacts

Source: Kennedy Associates Architects

The Proposal upholds the relevant objectives of the ADG in relation to building separation and visual privacy. Appropriate setbacks and design treatments have been incorporated to minimise overlooking and maintain amenity. The proposed mitigation measures are considered to adequately safeguard the privacy of future occupants and prevent any significant adverse impacts.

6.3.3 Pedestrian Wind Assessment

A Pedestrian Wind Environment Study (Wind Study) has been prepared by Windtech and included at **Appendix L**. It provides an assessment of the pedestrian comfort and safety of the development and surrounding areas. It contains information regarding the local wind climate analysis, wind tunnel testing and analysis procedures, a discussion of the test results, and recommendations to improve wind conditions in areas where any adverse wind conditions may be identified.

Methodology

Testing was performed at Windtech's boundary layer wind tunnel facility. The wind tunnel has a 3.0m wide working section and a fetch length of 14m, and measurements were taken from 16 wind directions at 22.5 degree increments. Testing was carried out using a 1:300 detailed scale model of the development, which was fabricated based on the architectural drawings received on 2 December 2024. The effects of nearby buildings and land topography have been accounted for through the use of a proximity model which represents an area with a radius of 375m.

The model was tested in the wind tunnel without the effect of any forms of wind ameliorating devices such as screens, balustrades, etc., which are not already shown in the architectural drawings. The effect of vegetation was also excluded from the testing. The existing site conditions were also tested, for comparison.

Assessment of Impacts

The assessment concludes that the that wind conditions for the majority of trafficable outdoor locations within and around the development will be suitable for their intended uses. Two (2) different tests were completed which looked at pedestrian comfort and pedestrian safety. Comfort criteria are set out by the provisions outlined in T.V. Lawson, 2001 looking at a maximum 5% exceedance Gust Equivalent Mean (GEM) Wind Speeds (m/s). W.H. Melbourne, 1978 provides detail on the safety criteria examining the annual maximum gust wind speed (m/s) of all trafficable areas.

The study showed that there were no areas identified on the site that would not satisfy the GEM, where all outdoor areas on the site pass the Safety Limit and Comfort Criteria. 91 locations underwent GEM testing which requires all locations sitting, standing or walking to be tested against a maximum 5% exceedance of 23m/s for 3 seconds. All locations passed these conditions and for further details on the Safety and Comfort wind tests, please refer to Appendix C and D of the Pedestrian Wind Assessment (**Appendix L**).

However, as a general note the use of loose glass-tops and lightweight sheets or covers (including loose BBQ lids) is not appropriate on high-rise outdoor terraces and balconies. Furthermore, lightweight furniture is not recommended unless it is securely attached to the balcony or terrace floor slab.

6.3.4 Solar Reflectivity and Lighting

Low-reflectivity materials have been adopted throughout the project, including floor-to-ceiling glazing, particularly at the lower podium levels and where zero lot construction is proposed against the neighbouring Shell Service Station site. On upper levels, reflectivity impacts of floor to ceiling glazing located against the main building line is mitigated by slab overhangs, recessed glazing, balconies and adjustable vertical louvres. Wintergardens to the northern end of the Building P are located away from the public domain and other residential buildings by the rail corridor which, at this location, is in excess of 60m wide. The wintergardens contain glass louvres which when open at different angles across consecutive floors will have a diffusing effect and minimise impacts on the surrounding areas.

To mitigate impacts on neighbouring properties and developments lighting across the project will be designed in accordance with Australian Standard AS4282 (Control of the Obtrusive Effects of Outdoor Lighting). In addition, the ground floor colonnade will be designed to comply with Australian Standard AS1158.6 (Lighting for Roads and Public Spaces) to ensure adequate visibility and safety throughout this publicly accessible space.

The solar reflectivity and lighting model for the Proposal is presented in **Figure 42** below.

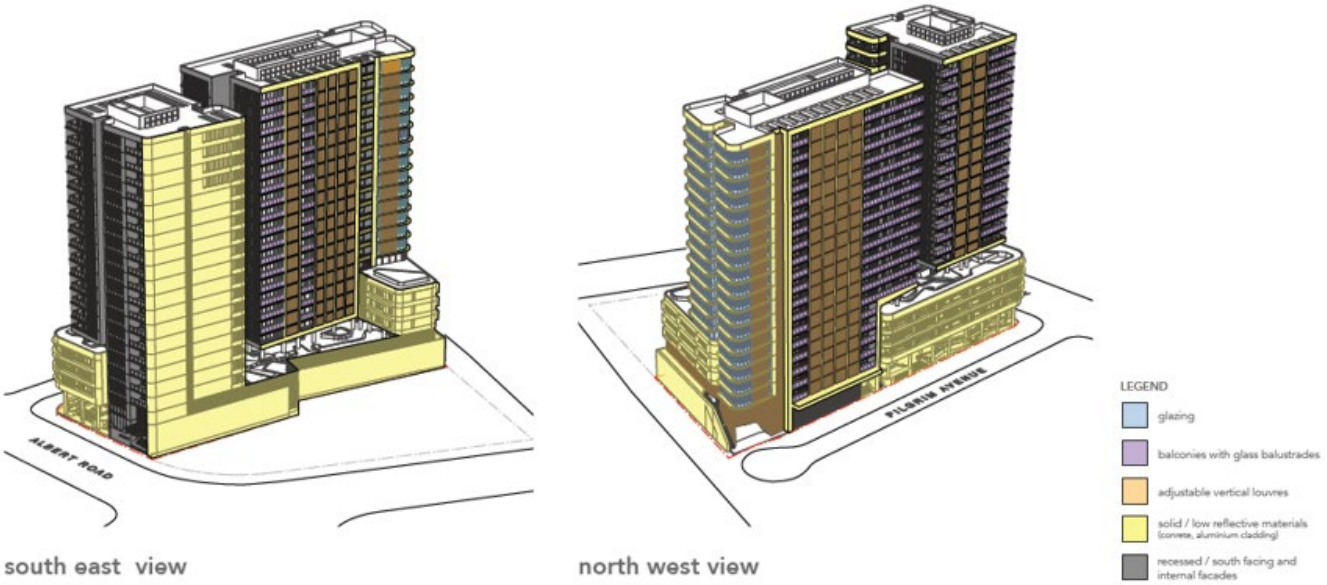


Figure 42 Solar and Reflectivity Model

Source: Kennedy Associates Architects

6.3.5 Residential Amenity

The Proposal will deliver a high level of residential amenity and residents will be provided with communal facilities and open space on Level 1, 4 and 5 which forms the podium roof. Apartments have been designed to maximise views towards the north, south and west as well as maximising natural light and ventilation.

A Design Verification Statement has been prepared by Kennedy Associates Architects and is included in the Design Report (**Appendix K**). It confirms the proposed apartments have been designed to achieve compliance with the Housing SEPP and its accompanying ADG. A detailed assessment against the principles of Housing SEPP, and the objectives and design criteria of the ADG, have been provided within the Design Report (**Appendix K**).

Communal Spaces

The communal open spaces are substantial in areas and offer premium recreational areas for future residents. A minimum of 50% of the principal useable communal open space (PUCOS) achieves direct sun on June 21 for a minimum of 2 hours between 9am and 3pm. The Proposal includes 56% of the total communal open space receiving direct sunlight which exceeds the ADG requirements.

The communal open space solar access models during a winter solstice are presented in **Figure 43** below.

Figure 43 Winter Solstice Communal Open Space Solar Access

Source: Kennedy Associates Architects

6.4 Visual Impact

A Landscape and Visual Impact Assessment (LVIA) has been conducted by de Witt Consulting and is included in **Appendix O**. The visual analysis including views from the public domain and from surrounding developments (existing and proposed). Drawing from the visual character elements described in the section above, a total of six (6) viewpoints were selected for this LVIA, including:

- Corner of Albert Road and Pilgrim Avenue;
- Raw Square;
- Albert Road;
- Pilgrim Avenue;
- Strathfield Station and Rail Corridor; and
- Albert Road, near the intersection of Stewart Place.

The viewpoints were enabled through an assessment for the following reasons:

- Range in proximity from close (<10m) to medium-range distant (approximately 365m), with most viewpoints located within the close range of distance;
- Represent views as experienced from a range of viewer settings (low density residential, business and commercial, high and low traffic environments etc);
- Are perceived from a range of elevations i.e. equivalent to, higher or lower than the Site;
- Are viewed over a range of durations; and
- Vary in terms of viewer sensitivity level.

The various viewing points are shown in **Figure 44** below.

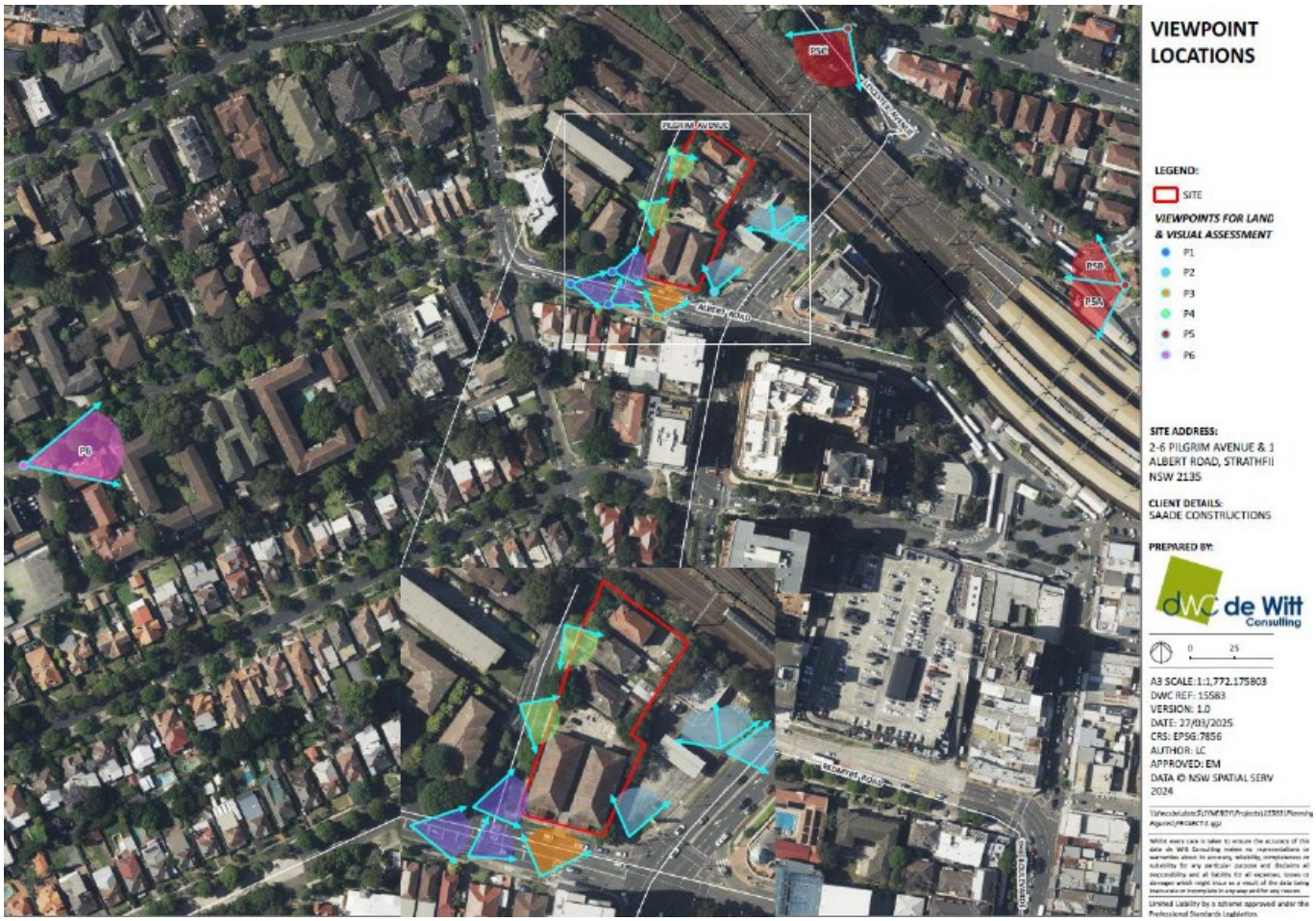


Figure 44 Visual Analysis Viewing Points

Source: de Witt Consulting

6.4.1 View Impacts on Surrounding Development

Commentary of the views of the Proposal from the various existing and proposed developments surrounding the Site is set out in **Table 19** below.

Table 19 Summary for View Impacts from Surrounding Developments

Viewpoint	Commentary
Viewpoint 1: Corner of Albert Road and Pilgrim Avenue	View loss was given a low rating because there is partial loss of open sky views but not loss of iconic or highly valued scenic views. The impact on physical absorption capacity and compatibility with the existing and desired visual character have each been assigned a low impact rating. The viewing duration and close viewing distance for nearby residents have contributed to a moderate magnitude rating and overall rating of moderate.
Viewpoint 2: Raw Square	Whilst visually prominent, the development will not add any conflicting or high contrast elements when compared with the existing and desired future character, thus having a low impact rating against that measure. When viewed from the street

Viewpoint	Commentary
	level the addition of the proposed development in this view does not negative affect the view composition as it does not impede significant views or landscape features. The development will change the view composition to distance northern and northeastern views experienced from elevated apartments to the south and southwest. Views from those locations include existing lower scale and emerging larger scale built form in the North Strathfield area, significant road and rail infrastructure in the middle distance and distant views (greater than 1000m) of Homebush, Homebush Bay, parkland and more the prominent features of Sydney Olympic Park. The viewing duration is high from nearby apartments but low for the large number of people moving through the area along Raw Square. On balance the duration impact is moderate. Close views will be perceived to have a greater impact due to the influence of perspective. Landscape views across to the north as obtained from higher elevation residential apartments are distant and therefore the development will have low impact. The opportunity for view loss is moderate and the overall significance is moderate.
Viewpoint 3: Albert Road	The proposed development has been assigned a low rating of visual impact noting the fewer number of visual receptors, and compatibility with the desired future character of Strathfield local centre.
Viewpoint 4: Pilgrim Avenue	Viewing distance and duration have a high and moderate effect respectively because the distance is less than 100m, whilst the number of receptors remains relatively low. The lasting impact to visual composition will be low, resulting in an overall significance rating of moderate.
Viewpoint 5: Strathfield Station and Rail Corridor	View loss was given a low rating because there is partial loss of open sky views but no loss of iconic views. The short duration of views experienced from this viewpoint further contributes to the low impact rating.
Viewpoint 6: Albert Road, near the intersection of Stewart Place	The proposed development will not result in views to significant features being blocked. Despite the residential setting, the duration of views is lower by nature of the development forming part of the overall, broader field of view, as opposed to views experienced from viewpoints 1-4 for example. The overall opportunity to interact with the view is lower hence the lower duration rating.

In summary, the Proposal would result in permanent low to moderate impacts for the selected viewpoints due mainly to the close proximity of development to sensitive residential receptors.

6.4.2 Visual impacts During Construction

Temporary and long-term visual changes to the Site and surrounding area will occur during the construction phase. The key visual considerations from the construction phase include:

- Demolition of existing structures;
- Construction of new laydown areas;
- Greater movement of vehicles and pedestrians on and travelling to and from the Site;
- Installation of hoarding around the construction site;
- Installation of new site office, maintenance sheds and other buildings;
- Earthworks associated with site preparation;
- Construction / installation of various new equipment associated with the proposed development;
- Installation of construction signage; and
- Airborne dust associated with construction activities.

The viewers with the highest visual impact from the construction activities will be those in closest proximity. The visual impacts from the construction activities are not necessarily an uncharacteristic change to the visual environment because of the likely expectation that development will occur in this location.

6.4.3 Mitigation Measures

The proposed mitigation measures in relation to visual impact are outlined in **Table 20** below.

Table 20 Mitigation Measures – Visual Impact

Potential Impact	Mitigation Measures
Excessive close-up viewing of the building	• Maximise opportunity to filter close views by facilitating deep soil landscape planting along the street frontages and adjoining the rail corridor. Provide street tree planting that is consistent established street trees (species, spacing etc) in the surrounding road reserves. This will ensure the valued landscape characteristics of the area are carried through to the newly developed site.
Close up views from nearby properties	• Consult with closest viewers including those in the nearby residential apartment buildings and surrounding low density development.
Construction visual impacts	• Ensure impacted viewers are informed off the construction starting point, duration and key milestones of activities (e.g. when cranes or hoardings are being erected or dismantled).
Visual impacts from unmaintained landscaping	• Once established, ensure landscaping is maintained for the life of the development so that the visual benefits continue to be enjoyed.

6.5 Traffic, Transport and Accessibility

A Traffic and Parking Assessment Report has been prepared by Varga Traffic Planning and is included at **Appendix P**. It includes an assessment of the operational traffic generation including cumulative impacts. A summary of the assessment and proposed mitigation measures are provided below.

6.5.1 Traffic Impact

Traffic Generation

For the purposes of this assessment, the traffic activity related to the existing land use and proposed traffic generation is determined with reference to the following documents:

- *TfNSW Guide to Traffic Generating Developments 2024* (TfNSW Guide 2024);
- *Guide to Traffic Generating Developments* (TTR-002); and
- *Technical Direction* (TDT 2013/04a).

To understand the net-traffic generation of the Proposal, traffic surveys were undertaken to estimate the trips generated by the retail uses, while low/medium density residential dwelling rates are used for the existing apartments from the TfNSW Guide 2024.

Subsequently, Varga determined that the previously approved DA would have generated 35 trips (Weekday AM Peak) and 27 trips (Weekday PM Peak) respectively. Adopting the respective relevant trip generation rate for each use, Varga estimates the Proposal will contribute 47 trips (Weekday AM Peak) and 37 trips (Weekday PM Peak) respectively, as outlined in **Table 21** below.

Table 21 Estimated Traffic Generation

Land Use	Peak Trip Generation Rate			Development Quantity	Peak Trip Generation	
	AM	PM	Unit		AM	PM
Commercial	1.69	1.20	Trips per 100m2 GFA	17	4	34
Residential	0.19	0.15	Trips per 100m2 GFA	195	43	3
Total					**47**	**37**

Source: Varga Traffic Planning

It is noted that the target demographic for the proposed in-fill affordable housing component is expected to be students and young professionals who traditionally have a low car ownership rate, particularly those that prefer living close to town centres with excellent public transport services, as supported by the Site.

Trip Distribution

Based on the characteristics of various land uses during different peak hours, the inbound and outbound trip distribution has been derived and are as follows:

- AM Peak:
  - Inbound trips: 11
  - Outbound trips: 36
- PM Peak:
  - Inbound trips: 28
  - Outbound trips: 9

All traffic flows in and out of the building will be made along Pilgrim Avenue, where traffic will head towards the end of the road and turn into vehicle driveway on the northern end of the Site.

6.5.2 Parking and Loading

Car Parking

The Site is subject to the minimum retail and residential car parking requirements set out in the Strathfield DCP 2005. The Proposal comprises an overall total of 237 car parking spaces and is compliant with the respective requirements, as outlined in **Table 22** below.

Table 22 Car Parking Assessment

Land Use	Area / Units	Minimum Parking Rates	Minimum Parking Requirement
Commercial			
Retail	254m^2	6.2 spaces per 100m^2 GLFA	15.7
Residential			
1 Bed	48	0.5 parking spaces	24
2 Bed	130	1 parking spaces	130
3 Bed	15	1.5 parking spaces	22.5
Subtotal	**193**	**-**	**176.5**
Affordable Housing			
1 Bed	9	0.4 parking spaces	3.6
2 Bed	25	0.5 parking spaces	12.5
3 Bed	1	1 parking space	1
Subtotal	**35**	**-**	**17.1**
Car Wash Bay		1 designated car wash bay for any development with over 10 dwellings	1
Total	**-**	**-**	**210.3**

Source: Varga Traffic Planning

Motorcycle Parking

The Strathfield DCP 2005 does not outline any motorcycle parking provisions for residential flat buildings however the proposal will provide 11 onsite motorcycle spaces on basement levels 1-4 and 3 on-street spaces on Pilgrim Avenue.

Bicycle Parking

The Strathfield DCP 2005 recommends that, "*suitable facilities for accommodating bicycle parking in all residential flat buildings must be provided*" however does not specify any rates. Reference is therefore made to the *Austroads Guide to Traffic Engineering Practice Part 14 – Bicycles*, which nominates the parking rates for bicycles provided in **Table 23** below.

The Proposal provides a total of 86 staff retail and residential bike parking spaces (across the ground floor and four basements), comprising of 70 residential spaces (in a secure Class 2 room) and 16 commercial/visitor spaces located on the ground floor. A basement storage cage per residential apartment has been provided which is capable of storing a bicycle thereby satisfying the bicycle parking requirements.

Given the differing demand profiles for retail and residential visitor bicycle parking space use, with retail demand typically occurring during the day and residential demand typically occurring during the evening, it has been deemed appropriate to adopt a co-sharing arrangement. On this basis, the number of spaces proposed is considered sufficient to meet the overall demand generated by the development. The number of spaces provided is also considered reasonable for a development of this size.

The proposed bicycle parking exceeds the minimum required set out in the *Austroads Guide to Traffic Engineering Practice Part 14 – Bicycles* by providing an additional 14 bicycle parking spaces

Table 23 Bicycle Parking Assessment

Land Use	Area / Units	Minimum Parking Rates	Minimum Parking Requirement
Shop			
Employees	254m2	1 space per 300m2 GFA	0.8
Visitors	-	1 space per 500m2 over 1000m2 GFA	-
Residential Accommodation			
Residents	228	1 space per 4 dwellings	57
Visitors	-	1 space per 16 dwellings	14.3
Total Parking Required	**-**	**-**	**72.1**

Source: Varga Traffic Planning

Loading and Servicing

The proposed loading and service area has been designed to comply with the relevant requirements specified in the Standards Australia publication, *Parking Facilities Part 2 - Off-Street Commercial Vehicle Facilities AS2890.2* in respect of loading bay dimensions and manoeuvring requirements. It is expected to be serviced by a variety of commercial vehicles up to and including Council's 10m long garbage truck, with a dedicated service area proposed on the ground floor level. The manoeuvring area has been designed to accommodate the swept turning path requirements of these 10m long rigid trucks, allowing them to enter and exit the Site in forward direction at all times.

6.5.3 Access

All vehicular access to the proposed development will be via the car park entry ramp off Pilgrim Avenue, with no vehicle access proposed along Albert Road. There is an existing driveway easement for 11 and 13 Albert Road which will be removed and replaced with a singular vehicle entrance at the end of Pilgrim Avenue. This aspect of the proposal remains consistent with the previously approved development scheme (DA 2020/256).

6.5.4 Mitigation Measures

The proposed mitigation measures for traffic, transport and accessibility are provided in **Table 29** below.

Table 24 Mitigation Measures – Traffic, Transport and Accessibility

Potential Impact	Mitigation Measures
Construction traffic management	• A detailed Construction Traffic Management Plan will be prepared by the future construction contractor prior to the commencement of construction to cover: - Description of construction activities and duration. - Approved construction work hours. - Detailed assessment of construction traffic impacts including any cumulative impacts. - Swept path analysis of heavy vehicle access to the site and works zone. - Detailed assessment of on-street parking impacts. - Emergency vehicle access and impacts to public transport services. - Traffic Guidance Scheme(s). - Contact details of key project personnel.

6.6 Noise and Vibration

An Acoustic Report has been prepared by Acoustic Noise & Vibration Solutions and is included at **Appendix Q**. It includes an assessment of the potential noise and vibration impacts during the construction works and operation of the Proposal, as well as noise intrusion from rail and traffic.

6.6.1 Existing Environment

Long-term and short-term noise and vibration monitoring have been undertaken onsite to determine the existing acoustic environment. The location of noise and vibration surveys and the surrounding neighbours is presented in **Figure 45** below.

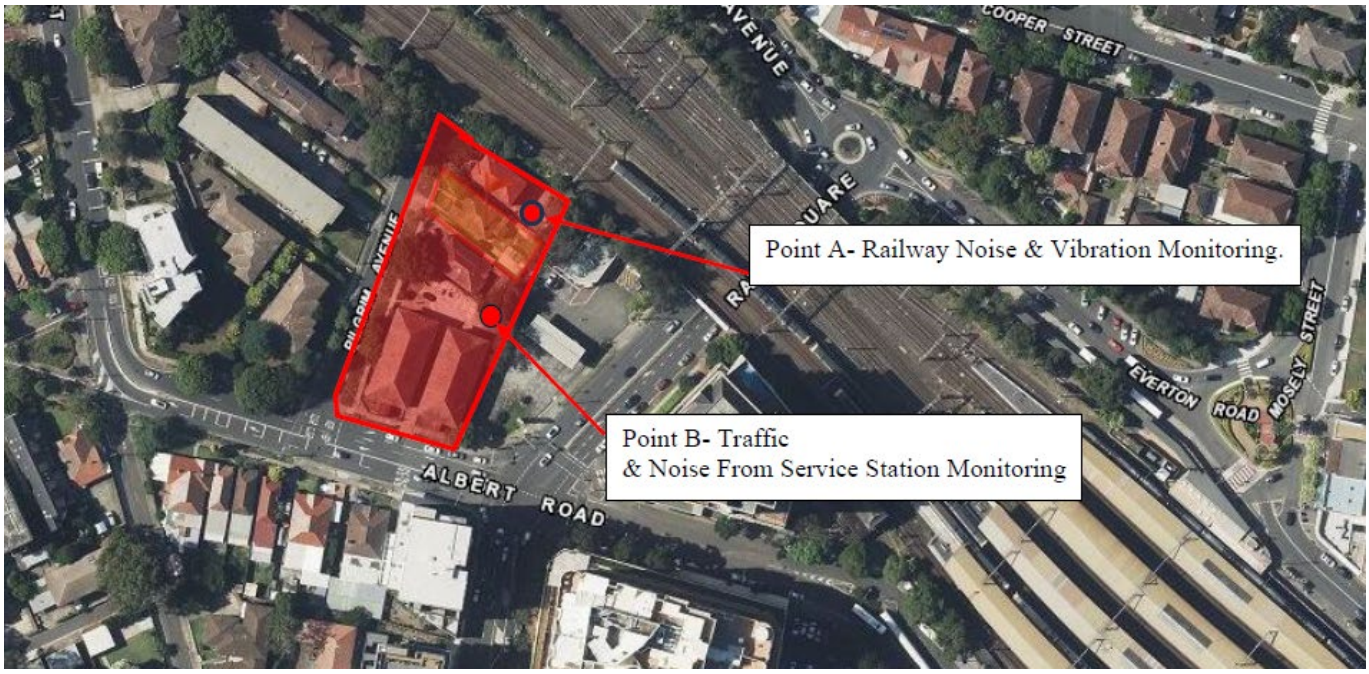


Figure 45 Site Surrounds and Noise and Vibration Monitoring Locations

Source: Acoustic Noise & Vibration Solutions

6.6.2 Assessment of Impacts

The main noise sources arising from the Proposal that may impact on surrounding sensitive receivers are classified into the following noise sources:

- Noise from the communal open space area on the roof; and
- Noise from mechanical plant & equipment including the air-conditioning units.

Communal Open Space

As described in **Section 3.0**, the Proposal includes common open space areas on Level 1, Level 4 and Level 5. Residents may congregate on the communal rooftop during casual social gatherings, which has the potential to impact surrounding residential receivers.

The predicted noise levels at the most affected residential receiver (9-11 Pilgrim Avenue) were assessed in accordance with ISO 9613.2 – *Acoustics – Attenuation of sound during propagation outdoors — Part 2: General method of calculation*. It assumed the outdoor common open space areas will be restricted to day and evening use only (7:00am – 10:00pm).

The assessment determined the use of common open space could generate an expected Leq dB(A) (at the boundary of receiver) of 27 dB(A), below the noise criteria of 55dB(A) during the daytime and 54dB(A) during the night-time. As such, the proposed communal open space will not result in impacts to surrounding sensitive receivers, with the proposed mitigation measures identified in **Section 6.6.3** in relation to external noise amenity impacts to surrounding properties to be implemented.

Mechanical Plant and Equipment

The Proposal includes mechanical plant and equipment that may impact surrounding sensitive receivers. It includes exhaust system for the basement car park, roller door at the entrance to the loading dock and basement, and air conditioning condenser units.

Based on the typical mechanical plant sound power levels and implementation of proposed mitigation measures relating to mechanical plant and equipment (refer to **Section 6.6.3**), the operation of the associated mechanical plant and equipment will comply with the criteria of the *NSW Noise Policy for Industry 2017*.

6.6.3 Mitigation Measures

The proposed mitigation measures in relation to noise and vibration are outlined in **Table 25** below.

Table 25 Mitigation Measures – Noise and Vibration

Potential Impact	Mitigation Measure
External noise amenity impacts to surrounding properties from communal open space	• Access to the communal areas on Level 1, 4 and 5 are to be restricted to 7:00am – 10:00pm. • Signs are to be installed advising that access to the rooftop is only permitted during the day and evening. • A 1.8m gap-free sound barrier is to be placed around the perimeter of the communal area on Level 4 in accordance with Figure 4 (Proposed Sound Barrier) of the Acoustic Report (Acoustic Noise & Vibration Solutions, dated 27 March 2025). Typical barrier compositions may include a 600 mm high planter box + 1.2m glass/perspex screen- gap free fence.
External noise amenity impacts to surrounding properties from mechanical plant and equipment	• Basement roller door: - Ensure maintenance and lubrication of motor bearings, door tracks and joints of roller door. - The proposed security door fitted to the car parking area entrance must be independently mounted on rubber pads to prevent vibration noise transmission through the concrete walls and/or columns. • Air-conditioning condenser units: - All outdoor air-conditioning units to be acoustically enclosed or set away by more than 3m from any boundary with a sound power level of each unit no more than 65 dB(A). • General mechanical plant: - An acoustic assessment is to be undertaken at the relevant Construction Certificate stage of all proposed mechanical plants and equipment once the

Potential Impact	Mitigation Measure
	development has been approved and full mechanical services plans have been prepared. Prior to this assessment, the following are to be incorporated in to the detailed design: - Procurement of quiet plant (when required) and the maintenance of existing plant. - Strategic positioning of plant away from potential sensitive receivers. - Commercially available silencers or acoustic attenuators for air discharge and air intakes of plant. - Acoustically lined and lagged ductwork. - Acoustic screens and barriers between plant and sensitive neighbouring premises; and/or, - Partially enclosed or fully enclosed acoustic enclosures around plant.

6.7 Water Management

An Integrated Water Management Plan (IWMP) has been prepared by Telford Civil and is included at **Appendix R**. It includes an assessment of the stormwater management performance and is supported by the Stormwater Concept Drawings (**Appendix H**).

6.7.1 Methodology

The IWMP has been prepared with consideration to Strathfield Council DCP, including the associated stormwater management policy and engineering design guideline which nominates the stormwater controls for the development. The proposed stormwater infrastructure and management measures, including proposed construction of pit and pipe network across the paved surface, are described in **Section 6.7.3** below.

A MUSIC model that considered the proposed stormwater treatment train was used to conceptualise stormwater treatment measures and ultimately inform the stormwater quality assessment (provided Under Separate Cover).

6.7.2 Assessment of Impacts

Stormwater Quantity

A summary of the results of the site peak discharge in the final configuration is included in **Table 26** below.

Table 26 Summary of peak discharge

Outlet	Scenario	Annual Exceedance Probability (AEP)					
		0.5EY	0.2EY	10%	5%	2%	1%
Lawful Point of Discharge	**Pre-Dev**	82 L/s	101 L/s	117 L/s	135 L/s	157 L/s	174 L/s
	Post-Dev (without OSD)	91 L/s	110 L/s	126 L/s	144 L/s	167 L/s	185 L/s
	Post-Dev (with OSD)	82 L/s	94 L/s	105 L/s	119 L/s	142 L/s	147 L/s

Source: Telford Civil

Stormwater Quality

A WSUD strategy is required to ensure that water quality being discharged from the site is achieved to a level that will satisfy Council's performance target reduction loads. The proposed stormwater concept design achieves the target reduction loads, as outlined in **Table 27** below.

Table 27 Stormwater Quality Assessment

Pollutant	Target % Reduction	Modelled Reduction
Total Suspended Solids	85%	85.3%
Total Phosphorus	65%	77.26%

Pollutant	Target % Reduction	Modelled Reduction
Total Nitrogen	45%	98.12%

Source: Telford Civil

6.7.3 Mitigation Measures

The proposed mitigation measures in relation to water management are outlined in **Table 28** below.

Table 28 Mitigation Measures – Water Management

Potential Impact	Mitigation Measures
Stormwater Runoff	• Allow stormwater runoff to drain from the site by gravity. Most of the roof and upper levels runoff is designed to be collected and drained towards the proposed water quality devices located within the site. • Most surface runoff from the paved areas is also captured by the proposed pit and pipe network across the paved surface and directed to the proposed water quality chamber for treatment and then to the proposed on-site detention tank before being discharged from the site at a legally approved point of discharge.
Nutrient pollutants Removal	• Use Stormwater measures like Oceanguards Filtration Baskets, and PSorb Filters (or approved equivalent) to treat and remove nutrient pollutants and gross from the stormwater drainage cycle from roof, hard surface and landscape.

6.8 Ground and Water Conditions

A Geotechnical Report has been prepared by Morrow and included at **Appendix S**. It provides geotechnical advice and recommendations related to the proposed development.

6.8.1 Methodology

The Geotechnical Report is based on a desktop review of available information and fieldwork undertaken on 23 and 26 October 2020. It included drilling of five (5) boreholes (BH1-5) with groundwater monitored through the installation of three (3) sandpipe piezometers. The locations of the boreholes are illustrated in **Figure 46** below.

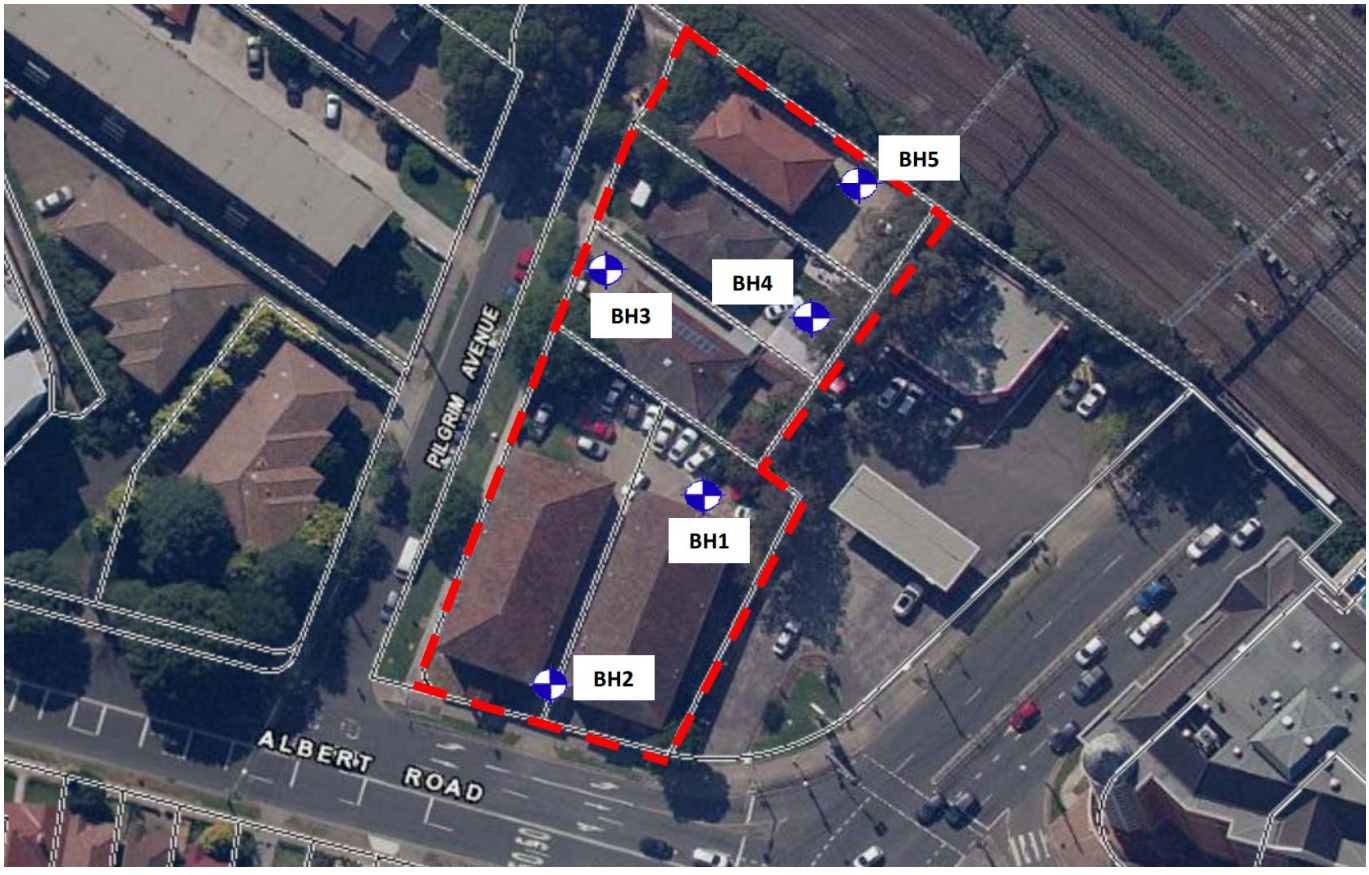


Figure 46 Borehole Locations

Source: Morrow

6.8.2 Existing Environment

The results of the borehole testing identified the following subsurface conditions of the Site:

- **Fill** – 0-0.6m in depth;
- **Firm to Stiff Clay** – 0.4m to 3m in depth;
- **Very Stiff to Hard Clay** – 1.5m to 4.6m in depth;
- **Very Low Strength Shale** – 3.5m to 5.1m in depth;
- **Low Strength Shale** – 3.5m to 5.8m in depth; and
- **Medium Strength Shale** – 4.4m to 11.2m in depth.

In relation to groundwater, standpipe piezometers were installed within BH1 and BH5 and pumped dry of drilling fluids following the investigation. Seepage inflow was noted at 3.3m and 2.9m below existing ground level respectively in BH1 and BH2 at the southern end of the Site. No seepage water inflow was noted during the drilling of BH3, BH4 and BH5 at the centre and northern end of the Site.

6.8.3 Assessment of Impacts

Impact on Soil Resources

The Site is not expected to have any impact on soil resources for the following reasons:

- It is not in a mapped acid sulfate soil area and further assessment is not required;
- It is not in a mapped area of high salinity potential and further assessment is not required; and
- It is not in an area of riparian lands and further assessment is not required.

Erosion and Sediment Run-off

During construction, a Sediment and Erosion Control Plan (SECP) will be put in place to ensure that water quality control is achieved by deposition and trapping of silts and clays which often have nutrients such as phosphorus and nitrogen attached to their surfaces. An SECP has been provided in accordance with Managing Urban Stormwater – Soils and Construction (Landcom, 2004) and is provided as part of the Concept Stormwater Drawings (**Appendix H**). It includes silt fences which will be erected prior to construction to control sediment runoff, reducing and isolating sediments and particulate matter.

6.8.4 Mitigation Measures

The proposed mitigation measures in relation to ground and water conditions are outlined in **Table 29** below.

Table 29 Mitigation Measures – Ground and Water Conditions

Potential Impact	Mitigation Measures
Ground and water management	The following measures are to be implemented during the construction phase: • All excavated material transported off-site will be classified in accordance with NSW EPA 2014 - Waste Classification Guideline Part 1; Classifying Waste. • Pump out tests to assess the hydraulic conductivity of soils below the groundwater level will be carried out to determine the need for tanking of the proposed basement. • A suitably qualified geotechnical engineer is to assess the condition of exposed material at foundation or subgrade level to assess the ability of the prepared surface to act as a foundation or as a subgrade. • Regular inspections of battered and unsupported excavations, where proposed, to confirm geotechnical conditions and to assess the suitability of design assumptions and to provide further advice with regards to excavation retention/ support and proposed construction methodologies (if required).
Sediment and Erosion Control	• A Sediment and Erosion Control Plan (SECP) will be implemented during the construction phase by the construction contractor. The controls included in the ESCP are to be reviewed and updated as the design, staging and construction methodology is further developed for the Proposal. The construction contractor is

Potential Impact	Mitigation Measures
	to maintain the erosion and sediment control measures and is to inspect the Site after every rainfall event and at least weekly.

6.9 Contamination and Remediation

A Preliminary Site Investigation (PSI) and Additional Site Investigation (ASI) has been prepared by EI Australia and included at **Appendix T** and **U** respectively. It evaluates the possibility for contamination to be present at the Site and determines if the Site is considered suitable, or could be made suitable from a contamination perspective, for the Proposal.

6.9.1 Methodology

The PSI provides an assessment based on the following activities undertaken:

- Sampling fill and natural soils from five borehole locations systemically across the site sing an approximate grid-based sampling pattern to characterise in-situ soils.
- Construction of three (3) groundwater monitoring wells to a maximum depth of 9 mBGL (or refusal) for groundwater characterisation.
- Sampling groundwater during a single groundwater monitoring event (GME) at three monitoring wells located up gradient and down gradient of anticipated groundwater flow to assess for potential impacts.
- Laboratory analysis of presentive soil and groundwater samples for the identified chemicals of concern.

6.9.2 Assessment of Impacts

The ASI concludes the following:

- The current site use consists of three residential unit blocks and two individual residential dwellings. There is no evidence of underground storage tanks (USTs) or underground petroleum storage systems (UPSS) on site. a Shell Service Station is operating directly adjacent to the east (Site 2, 9 Albert Street).
- The previous (preliminary) investigation completed by EI (2018) established that:
  - The site has been used for residential purposes from at least 1943.
  - Limited intrusive investigation at five locations reported concentration below the adopted criteria (NEPC (2013) residential with minimal opportunities for soil access) with the exception of lead in BH102_0.3-0.4 (2,800 mg/kg).
  - Data gaps following the investigation include groundwater assessment and additional soil investigation to cover the minimum guideline density.
- As apart of this ASI, intrusive soil investigation was completed at four locations (BH201, BH202, BH203M and BH204M). groundwater sampling was completed at two monitoring wells (BH203M and BH204M) targeted at the boundary of the Shell Service Station (Site 2).
- The site lithology was generalised as a layer of gravelly silt, silty clay filing (various depths averaging 0.35m thickness), overlaying natural, silty clay and shale bedrock. Subsurface conditions were consistent with the previous investigation however an average of 1.4m of fill was encountered in EI (2018).
- Standing water level was 7.39 mBGL and 8.14m BGL within the shale bedrock. Groundwater flow direction was inferred from local topography to the north-east, towards Parramatta River.
- All analytical results in representative fill and natural soil samples were found to comply with the adopted health-based criteria.
- Hydrocarbon odour was noted during drilling in shale bedrock at 10mBGL at BH204M. The odours material was not sampled. However, no odour was detected during groundwater sampling and laboratory results for hydrocarbons in groundwater in both wells were below the laboratory limit of reporting.
- Contaminant concentrations in the representative groundwater samples were below the adopted criteria, with the exception of minor dissolved metals (chromium and zinc). The metal concentrations in groundwater were considered consistent with natural (background) conditions in long standing, urban environments, rather than site specific impacts. Therefore, the detected metal concentration is not considered to be cause of environmental concern for the site development.
- There is localised lead impact (2,800 mg/kg) in fill around location BH102 (to a depth of at least 0,4m BGL). However, under the proposed development, bulk excavation of site soils would be performed in order to

construct the basement which covers location BH102. Ut was considered the risk to human health and the environment was low; and

- The site can be made suitable for the proposed development, provided the recommendation detailed in section 10 of the ASI are implemented.

The ASI makes a series of recommendations that have been incorporated into the proposed mitigation measure for contamination and remediation (refer to **Section 6.9.3** below).

6.9.3 Mitigation Measures

The proposed mitigation measures in relation to contamination and remediation are outlined in **Table 30** below.

Table 30 Mitigation Measures – Contamination and Remediation

Potential Impact	Mitigation Measure
Identification and management of hazardous building materials	• Prior to proposed site demolition, a suitably qualified and experienced consultant should be engaged to perform a Hazardous Materials Survey on existing site structures to identify potentially hazardous building products that may be released to the environment during demotion works. All identified hazardous materials must be appropriately managed to maintain worker health and safety during demolition works and to precent spreading of hazardous materials to site soils.
Fill material within proposed basement footprint	• Fill material within the proposed basement footprint, which will include the lead impacted surficial fill, is to be classified and disposed off-site in accordance with EPA (2014) Waste Classification Guidelines as part of bulk excavation works for the construction of the four-level basement carpark. All soil to be disposed offsite is to be classified in accordance with EPA (2014) Waste Classification Guidelines m including VENM.
Environmental impact minimisation during earthworks	• A Construction Environmental Management Plan (CEMP) is to be prepared by the principal or earthworks contractor. It will include all environmental concerns that may occur during development such as nut limited to dust, noise, odour, vibration, safety, traffic, waste management of soils so they are in accordance with the NSW EPA Waste Management Guidelines and provided unexpected finds protocols should any unexpected hydrocarbon contamination or hazardous materials are identified during site earthworks.
Groundwater impacts	• Prior to the commencement of construction, an additional groundwater monitoring event is to be conducted to confirm groundwater results. The groundwater monitoring wells are to be surveyed to provide indicative groundwater flow direction.
Importation of unsuitable material	• Any material imported to the site will be assessed for potential contamination in accordance with NSW EPA guidelines as being suitable for the intended use or be classified as VENM.
Suitably of site for proposed land uses	• A final site validation report is to be conducted by a qualified environmental consultant, certifying the site suitability of soils and ground water for the proposed land uses.

6.10 Trees and Landscaping

The assessment of trees and landscaping is supported by an Arboricultural Impact Assessment (AIA) prepared by Birds Tree Consulting included at **Appendix V**, together with Landscape Drawings prepared by Melissa Wilson Landscape Architects included at **Appendix I**.

6.10.1 Arboricultural Impact Assessment

The AIA has been prepared to identify the trees to be retained and removed as part of the Proposal and to assess potential tree impacts. The AIA assessed a total of forty (40) existing trees within the Site, making the following conclusions:

- The Tree Protection Zones (TPZ) of **Trees 2, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 35, 36, 37, 38, 39** and **40** are encroached at soil level by the proposed construction and required earthworks by a total or major

encroachment as defined by AS4970-2009 Protection of Trees on Development Sites. These trees will not be viable to be retained and will be required to be removed due to the impact of the proposed development.

- **Tree 24** is dead with no visible habitat and is recommended for removal.
- The TPZ of **Trees 3, 4, 5, 6, 7, 8, 9, 10, 26, 27, 28, 29, 30, 31, 32, 33**, and **34** are encroached at soil level by the proposed construction and required earthworks by a major encroachment. Consideration is made of the existing masonry walling and footings providing a physical barrier to root development under clause 3.3.4 of AS4970-2009 and assessment of the at grade impact on these trees is made on this basis.
- The live crown of **Trees 8, 9, 27, 28, 29, 30, 31, 32, 33** and **34** will be encroached by the proposed building façade and required scaffolding and the crown reduction pruning required will reduce the crown by between 10% to 40% and will impact the balance of the remnant crown. Due to the upright form and decurrent branches of these trees, the crown reduction pruning required will not impact the viability of the trees to be retained.
- All other trees are viable to be retained and are to be protected.

The Tree Removal and Retention Plan identifying all trees assessed is provided in **Figure 47** below.

Figure 47 Tree Removal and Retention Plan

Source: Bird Tree Consulting

6.10.2 New Tree Canopy

To mitigate the impact of the reduction in tree canopy, new tree planting is proposed both within the Site and on the adjacent street frontages. The total tree canopy (on-site and within the public domain) will extend to approximately 1,312.55m^2 (refer to **Figure 48**).

Within the site, substantial tree canopy can be established within the Level 1 and 6 courtyard space and the Pilgrim Avenue planter boxes. The Proposal introduces ten (10) new trees to enhance the streetscape, comprising three (3) Mugga Ironbark (Eucalyptus sideroxylon) along Albert Road, and four (4) Lemon-Scented Gum (Corymbia citriodora) and three (3) Water Gum (Tristaniopsis laurina) along Pilgrim Avenue. This supports the creation of a cohesive and diverse urban canopy that complements the existing vegetation retained. The selected species reflect the common street tree context of Strathfield and are proven to grow well in the public realm including footpath verges.

Figure 48 Tree Canopy Coverage Plan

Source: Melissa Wilson Landscape Architects

6.10.3 Mitigation Measures

The proposed mitigation measures in relation to trees and landscaping are outlined in **Table 31** below.

Table 31 Mitigation Measures – Trees and Landscaping

Potential Impact	Mitigation Measure
Retention of identified trees	Trees 2, 3, 6, 8, 9, 11, 12, 13, 14, 15, 27, 28, 29, 30, 31, 32, 33, 34 are to be retained and protected in accordance with the Arboricultural Impact Assessment (Bird Tree Consultancy, 9 October 2024)
Protection of retained trees during construction	The measures identified within Section 10, 11 and 12 of the Arboricultural Impact Assessment (Bird Tree Consultancy, 9 October 2024) are to be incorporated for the duration of the construction phase (as necessary).

6.11 Ecologically Sustainable Development

An Ecologically Sustainable Development (ESD) Report has been prepared by Efficient Living and is included at **Appendix W**. It provides an assessment of the Proposal against the applicable sustainability requirements and targets, identifying the strategies proposed to be implemented and demonstrating compliance.

It is supported by NatHERS and BASIX Certification and Section J Assessment also prepared by Efficient Living and included at **Appendix X** and **Y** respectively.

6.11.1 Consistency with ESD Principles

Section 193 of the EP&A Regulation outlines four (4) principles of ecologically sustainable development to be considered in assessing a project, with an assessment against the principles is provided in the following sections.

Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

The project is not considered to create any threat of serious environmental damage given its location on an existing developed site in a highly urbanised area. The development process is established with any potential impacts understood with a high level of certainty.

The project demonstrates a commitment to minimising environmental impact, implementing climate change resilience measures, implementing resource conservation measures and implementing human health and wellbeing measures. In combination these initiatives deliver the concept behind a precautionary approach to approving development based on avoidance of potential future or uncertain impacts.

This EIS and its supporting reports and studies has not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is not relevant to the Proposal. On balance the project presents very low risk to the environment and supports sustainable outcomes.

Intergenerational Equity

Intergenerational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. Achieving inter-generational equity requires that the proposal takes steps to avoid, mitigate and support processes that preserve the environment and sustainability of communities over the long term.

The proposal includes environmental performance initiatives and outcomes to deliver inter-generational equity. The proposed ESD initiatives incorporate measures that greatly reduce Greenhouse Gas emissions and consumption of energy, incorporate onsite renewable electricity supply, conserve water and minimise resource consumption and embodied energy in materials.

The primary performance benchmarks for these categories include:

- Minimising carbon emissions and energy – meeting or exceeding requirements:
  - Scope 1 and 2 CO2 emissions for the building, a 64% savings against norm; options included to reduce significant Scope 3 CO2 emissions.
  - Sustainable Building SEPP 2022 BASIX energy score of 61% and average NatHERS thermal performance rating of 7 stars, minimum apartment score of 6 stars.
  - 25 kW PV array included for onsite renewable electricity (BASIX compliance) and embedded network operator option sought for 100% renewable electricity to electric services with the potential to expand PV array to 35 kW.
  - Investigation to reduce energy demand in commercial spaces by 20% compared to a reference building
  - Target to reduce upfront carbon emissions in materials by 20%; and
  - Provision for 100% EV parking spaces (NCC 2022) allows transition away from ICE vehicles saving on average over 433 tCO2pa.
- Water conservation – meeting or exceeding requirements:
  - Reduce potable water demand to meet the Sustainable Building SEPP BASIX requirements through water efficient appliances and fixtures, achieving a BASIX score of 41%; and
  - Alternative water source (3,000L rainwater tank) provisioned (not BASIX requirement) to be used for landscape irrigation, landscape utilises palette of low water use species and efficient irrigation where required.
- Responsible materials and waste management:
  - Target to recycle or reuse 90% of construction waste; implement waste streaming to support operational phase recycling outcomes; and
  - Procurement strategy to target key materials with Environmental Product Disclosures and low environmental impact.
- Climate change resilience:
  - Final building systems and site drainage detailed design to be reviewed to consider increased extreme rainfall events, storm events and heat wave events for operational performance in extremes; and
  - Heat island mitigation steps including high reflection horizontal hard surfaces, planned canopy and green cover and attention to preventing building reflection to the ground level.
- Human health and wellbeing:
  - Procurement strategy to target low VOC and low/no formaldehyde products to improve air quality;
  - Acoustic and lighting (and daylighting) outcomes and products tailored for healthy and comfortable living environments; and
  - High levels of daylight access to residential dwellings.

The Proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term

implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Conservation of biological diversity and ecological integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The renewal strategy for the site seeks to retain existing trees wherever possible (mainly on boundaries), maximise the use of local native species in landscape, provide new canopy trees and minimise impacts on environmental systems (such as climate/ carbon emissions, stormwater volume and quality controls).

The target for the proposal is for a post development outcome with no greater biodiversity or ecological impact than the current land use, which includes low rise apartments and detached dwellings sitting in extensive areas of concrete hardscape, with low to medium value vegetation within the site area including small areas of grass and scattered trees.

The Proposal includes a substantial tree canopy from a combination of street trees and new canopy coverage achieved within the Site. Refer to the Landscape Drawings (**Appendix I**) and **Section 6.10** for further discussion.

Improved valuation, pricing and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. The sustainability and environmental measures for the project are being incorporated in the early design and cost plan for the project to ensure the most economic pathways are identified through design and construction.

Further, the specification of materials and equipment will strongly consider the most cost efficient operations and maintenance outcomes which are anticipated to also match the most efficient environmental outcomes for the apartment complex operation (for example use of PV arrays to minimise the long term financial and environmental cost of electricity, choice of robust building materials with a long useful life).

As the building will be 'all electric', future occupants will be able to choose their preferred pathway and retailer to access renewable electricity for private apartment uses and for electric vehicle charging—communal area access to renewable energy will be factored into the building cost through provision of the solar/PV array system and then will be determinable by the body corporate for remaining common area electricity demand.

6.12 Biodiversity

The Proposal is not likely to have any significant impact on biodiversity values. Accordingly, this has been recognised by NSW Biodiversity, Conservation and Sciences in granting a waiver for the preparation of a Biodiversity Development Assessment Report (BDAR) on 7 March 2025 (refer to **Appendix Z**).

6.13 Waste Management

A Waste Management Plan (WMP) prepared by Dickens Solutions included at **Appendix AA**. It estimates the quantity of waste that would be generated by the Proposal during demolition, construction, and operation, management of hazardous materials and also identifying the amount of waste to be diverted from landfill and waste management measures to minimise waste.

6.13.1 Methodology

The WMP has been informed by waste management guidelines, including the waste management controls of the Strathfield LEP 2012, Strathfield DCP 2005, all conditions of consent issued under the approved Development Application, the 'Better Practice Guide for Waste Management in Multi Unit Dwellings and Mixed-Use Developments, and the objective of ensuring that all waste management facilities and collection services will provide an outcome that will be effective and efficient, as well as promote the principles of health, safety and convenience.

The waste generation volumes for the demolition and construction phases were provided to Dickens Solutions by the Applicant. The WMP has been developed and documented generally in accordance with the Strathfield Council DCP 2005 – Part H - Waste Management. These targets were supported by industry, community, state, and local governments during the Strategy's consultation phase, and include increasing construction, demolition recycling and increasing waste diverted from landfill rates to 60-90%.

6.13.2 Demolition and Construction Waste

Demolition Waste

The estimated volumes of waste generated from the demolition of the existing structures on the Site and excavation of the basement are outlined in **Table 32** below.

Table 32 Estimated Demolition Waste Generation and Landfill Diversion

Material	Volume (m^3)	Tonne (t)	Estimated Tonnage of Material Diverted from Landfill
Excavated Materials & Overburden	335	570	N/A
Green Waste	50	7.5	90%
Bricks	225	225	75% - 90%
Concrete	1,000	2,400	75% - 90%
Timber	150	60	65% - 90%
Plasterboard and Fibro	90	30	N/A (All materials will be processed off-site)
Metals / Steel / Guttering & Downpipes	100	33	60% - 90%
Roof Tile and Tiles	90	67.5	80% - 90%
Fixture & Fittings (Doors Fittings, Other Fixtures, etc)	120	40	80% - 90%
Glass, Electrical & Light Fittings, PC Items, Ceramics, etc	150	75	N/A
Residual Waste	230	230	N/A
Totals	**2,540**	**3,738**	**N/A**

Source: Dickens Solutions

The Applicant notes that existing structures on the Site are currently occupied and cannot be accessed or damaged. It is expected that a condition of consent would accompany any approval that would require a pre-demolition HAZMAT survey to be completed prior to demolition and that removal of all hazardous building materials are completed by a licensed asbestos removal contractor in accordance with SafeWork NSW requirements (refer to **Section 6.13.5**). All demolition works will be conducted in accordance with POEO (UPSS) Regulation 2014 and associated guidance documents. Prior to commencement of demolition works a Hazardous Materials Survey on existing site structures to identify potentially hazardous building products that may be released to the environment during demolition is to be provided.

Construction Waste

The estimated values if waste generated from the construction phase are outlined in **Table 33** below.

Table 33 Estimated Construction Waste Generation and Landfill Diversion

Material	Volume (m^3)	Tonne (t)	Estimated Tonnage of Material Diverted from Landfill
Excavated Materials	17,000	28,900	N/A
Green Waste	10	1.5	75% - 90%
Bricks	10	10	75% - 90%
Concrete	10	24	60% - 75%
Timber	15	6	65% - 90%

Material	Volume (m^3)	Tonne (t)	Estimated Tonnage of Material Diverted from Landfill
Plasterboard and Fibro	8	2.8	N/A (All materials will be processed off-site)
Metals / Steel / Guttering & Downpipes	10	1.25	60% - 90%
Tiles	5	3.75	80% - 90%
Plastics	8	2.5	80% - 95%
Glass, Electrical & Light Fittings, PC items	6	2.5	70% - 90%
Fixture & Fittings (Doors Fittings, Other Fixtures, etc.)	10	3.5	80% - 90%
Pallets	20	5	90% - 100%
Residual Waste	1,750	1,750	N/A
Totals	**18,862**	**30,712.8**	**N/A**

Waste Management

The WMP demonstrates that a significant amount of demolition waste and construction waste can be diverted from landfill. The WMP identifies management measures including opportunities for reuse and recycling, responsibilities, monitoring and reporting, as well as site-specific measures. A detailed Construction WMP will be implemented for the during of works which the Construction Contractor will be responsible for implementing, although staff on-site have a responsibility to ensure their own compliance at all times.

6.13.3 Operational Waste Management

Methodology

The Operational WMP addresses the waste management aspects associated with the local, state, and national requirements for the proposed development. It adopts waste generation rates from the Strathfield LEP 2012 and Strathfield DCP 2005 to calculate the number of general waste and recycling bins required for the residential and retail uses. Better Practice Guide for Resource Recovery in Residential Developments (NSW EPA, 2019) has been referenced to calculate the total number of bins for the multi-unit dwellings and mixed-use developments. There will be no formal green waste service provided in the development. It will be the responsibility of the Owners Corporation and stipulated in a future strata management document to ensure that any green waste generated from the on-going use of the Site, will be disposed of appropriately.

Waste Management

Separate waste storage rooms are provided for each use, as demonstrated within the Architectural Drawings (**Appendix B**). The Operational Waste Management Plan at **Appendix AA** provides additional details of how waste from the various uses will be managed via the common loading dock. A detailed OWMP will be implemented during operation of the development to establish clear waste management procedures.

The residential component of the building will be constructed of two cores with the Albert Road Core containing 81 x 1, 2 and 3 bed units, and the Pilgrim Avenue Core containing 147 x 1, 2 and 3 bed units.

A Garbage Chute System will be incorporated into the building design for the residential component for the reception of waste material only for all cores over all levels from Level 1 up. Where chutes are installed Waste and Recycling Compartments will be provided to all residential levels of the building for the use of residents to deposit both waste into the chute hopper. All waste from the garbage chute will fall into 1 x 660-litre waste bin positioned under a 4 x 660-litre waste bin carousel provided in the one (1) of two (2) bin/chute rooms located on the ground level (Level 00) as indicated in the architectural drawings in **Appendix B**.

Also located in each Waste and Recycling Compartment, provided on all residential levels, will be 2 x 240-litre recycling bins for residents to dispose of their recycling material. All full recycling bins will be transferred from

each recycling compartment by the Building Manager or their authorised representative, into the Residential Bin Presentation Area (RBPA) on the ground floor, where they will be stored prior to servicing.

6.13.4 Hazardous Building Materials

The WMP notes due to the age of the buildings on the Site, there is reasonable potential for hazardous building materials to present during demolition. The management can be carried out using commonly used and available demolition techniques and in accordance with regulatory requirements and standards. Accordingly, the generation, storage, treatment and the disposal of hazardous waste (including asbestos) will be conducted in accordance with relevant waste legislation administered by the NSW EPA and any applicable WH&S legislation administered by Work Cover NSW.

All friable and non-friable asbestos-containing material shall be handled and disposed of off-site at an EPA licensed waste facility by an EPA licensed contractor in accordance with the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classifications Guidelines – Part 1 'Classifying Waste (EPA 2014) and any other instrument as amended.

6.13.5 Mitigation Measures

The proposed mitigation measures in relation to waste management are provided in **Table 34** below.

Table 34 Mitigation Measures – Waste Management

Potential Impact	Mitigation Measure
Generation and management of waste	• A detailed Waste Management Plan will be implemented for the duration of construction and operation. It must adopt measures and strategies from the Waste Management Plan associated with SSD-80432461 to mitigate the impacts from waste, including waste avoidance, reuse and recycling measures.
Identification and management of hazardous materials	• Due to the age of the existing buildings a pre-demolition hazardous materials (HAZMAT) survey of buildings constructed prior to 2004 is to be undertaken in accordance with Australian Standard AS2601-2001 Demolition of Structures. • If hazardous materials are identified, they will be removed prior to demolition of structures in accordance with the NSW WHS Act, Chapter 8 of the WHS Regulation and SafeWork NSW Codes of Practice and preparation of an Asbestos Management Plan to inform the removal of asbestos containing building materials and potential lead paint in accordance with SafeWork NSW requirements including clearance certificates provided by a SafeWork NSW Licensed Asbestos Assessor or "Competent Person" as defined by the Code of Practice.

6.14 Social Impact

A Social Impact Assessment (SIA) has been prepared by The Social Aspect and is included at **Appendix BB**. It assesses the impacts of the development (both positive and negative) for all stages of the project lifecycle for key stakeholders and the broader affected community. It subsequently recommends appropriate social mitigation and enhancement measures.

6.14.1 Methodology

The SIA is consistent with the SIA Guideline and the Undertaking Engagement Guidelines for State Significant Projects (Engagement Guidelines) (NSW DPHI, 2024). The SIA Guideline and Engagement Guidelines outline some mandatory requirements to be met by SIA practitioners in NSW and provide a framework for identifying, evaluating and responding to social impacts. They provide guidance for stakeholder and community engagement, data collection, project refinement, and the monitoring and management of social impacts.

Specifically, the SIA aims to:

- Identify the social locality for the project;
- Outline the SIA methodology applied for the study;
- Describe the stakeholder and community engagement activities undertaken during the SIA, and the outcomes of these activities;
- Outline the existing social baseline for the project; and

- Identify, evaluate and respond to the predicted social impacts of the project.

To assess social impact, the SIA Guideline considers both the magnitude of the potential social impact (minimal, minor, moderate, major and transformational) and the likelihood of the impact occurring (very unlikely, unlikely, possible, likely and almost certain) which is then used to determine an overall evaluation of the social impact as 'low', 'medium', 'high' or 'very high'. The assessment considers the Social Locality, as identified **Figure 49** below.

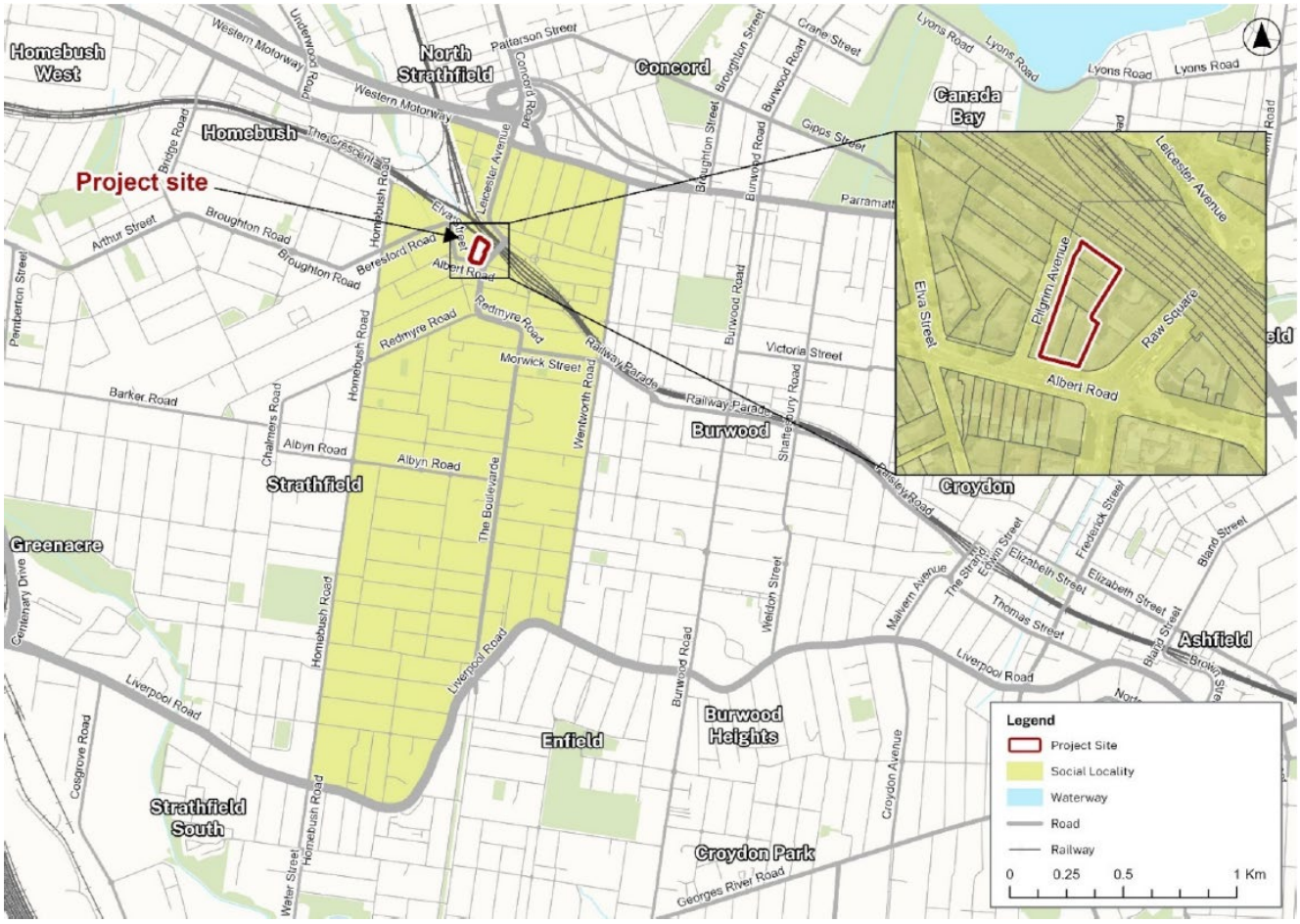


Figure 49 The Nominated Social Locality

Source: The Social Aspect

6.14.2 Existing Environment

An analysis of the demographic profile of the identified study area compared to the NSW average was undertaken based on Census of Population and Housing (ABS, 2021) data. In summary, the community within the Social Locality is characterised by a young population with high rates of no car ownership and on par income levels compared to the NSW average. Most people live in medium-to high density housing and pay more per week in rent than the NSW average.

The Social Locality appears to be currently well serviced, particularly open space and public transport. The Site is approximately 200m to the west of Strathfield Station and several bus stops, WestConnex and located in the Strathfield Town Centre.

6.14.3 Assessment of Impacts

A summary of the project's predicted social impacts and their characteristics is provided in **Table 35**. The residual impacts significance have been determined on the basis that the proposed mitigation measures identified at **Appendix E** would be applied by the project.

Table 35 Social Impact Assessment Summary

Impact to People	Social Impact Category	Affected Parties	Residual Impact Significance
Predicted Positive Impacts			

Impact to People	Social Impact Category	Affected Parties	Residual Impact Significance
Improvement to the built environment and amenity in social locality	Surroundings	Residents, road users, and nearby business owners and their customers	Very High
Access to additional businesses and commercial opportunities	Access	All people in the social locality, depending on businesses that are established in commercial units	Medium
Access to additional housing, including affordable apartments	Access	Prospective home buyers, including low-income individuals and families	Very High
Access to more public land and greenspace	Access	Residents, near neighbours, and others in the social locality that interact with the communal open spaces	High
Employment opportunity and business growth	Livelihood	Tradespeople, construction and property management companies, retail stores, cafes, and service providers	Medium
Predicted Negative Impacts			
Disturbance from construction noise and vibration	Surroundings	Nearby residents, businesses and road users	Medium
Overshadowing: reduction in aesthetic quality, ambience, and usage of outdoor areas. Also general health and wellbeing.	Surroundings	Residents living in dwellings situated between Ardittos Lane and Albert Road, and on Pilgrim Avenue	Medium
Frustration due to traffic congestion and pedestrian access restrictions.	Access	Near neighbours, businesses and other organisations (employees and suppliers), and road users (including pedestrians) which use which Leicester Avenue, The Boulevard, Raw Square, Albert Road and Pilgrim Avenue in particular.	Medium
Increased demand for goods and services in the social locality resulting in reduced access	Access	Primarily consumers in the broader social locality, but also organisations and businesses in Strathfield town centre	Low
Alternate accommodation search	Decision-making systems	Residents currently in dwellings on the project site (vulnerable people)	Medium
Frustration from a cumulative traffic impact associated with Meriden School development	Access	Road users in the social locality, Including pedestrians, pupils of the Meriden School, and their guardians	Low

Source: The Social Aspect

6.14.4 Assessment of Impacts

A summary of the project's predicted social impacts and their characteristics is provided in **Table 35**. The residual impacts significance have been determined on the basis that the proposed mitigation measures identified at **Appendix E** would be applied by the project.

Table 36 Social Impact Assessment Summary

Impact to People	Social Impact Category	Affected Parties	Residual Impact Significance
Predicted Positive Impacts			
Improvement to the built environment and amenity in social locality	Surroundings	Residents, road users, and nearby business owners and their customers	Very High
Access to additional businesses and commercial opportunities	Access	All people in the social locality, depending on businesses that are established in commercial units	Medium
Access to additional housing, including affordable apartments	Access	Prospective home buyers, including low-income individuals and families	Very High
Access to more public land and greenspace	Access	Residents, near neighbours, and others in the social locality that interact with the communal open spaces	High
Employment opportunity and business growth	Livelihood	Tradespeople, construction and property management companies, retail stores, cafes, and service providers	Medium
Predicted Negative Impacts			
Disturbance from construction noise and vibration	Surroundings	Nearby residents, businesses and road users	Medium
Overshadowing: reduction in aesthetic quality, ambience, and usage of outdoor areas. Also general health and wellbeing.	Surroundings	Residents living in dwellings situated between Ardittos Lane and Albert Road, and on Pilgrim Avenue	Medium
Frustration due to traffic congestion and pedestrian access restrictions.	Access	Near neighbours, businesses and other organisations (employees and suppliers), and road users (including pedestrians) which use which Leicester Avenue, The Boulevard, Raw Square, Albert Road and Pilgrim Avenue in particular.	Medium
Increased demand for goods and services in the social locality resulting in reduced access	Access	Primarily consumers in the broader social locality, but also organisations and businesses in Strathfield town centre	Low
Alternate accommodation search	Decision-making systems	Residents currently in dwellings on the project site (vulnerable people)	Medium
Frustration from a cumulative traffic impact associated with Meriden School development	Access	Road users in the social locality, Including pedestrians, pupils of the Meriden School, and their guardians	Low

Source: The Social Aspect

6.14.5 Mitigation Measures

The proposed mitigation measures in relation to social impact is provided in **Table 37** below.

Table 37 Mitigation Measures – Social Impact

Potential Impact	Mitigation Measure
Impact to existing residents on-site	• An interface is to be established between the existing residents and housing organisation(s) and that the residents are provided with contact details and advice to pursue other housing options. This information will be provided as soon as possible after planning determination has been made.

6.15 Flood Risk

A Flood Impact Assessment (FIA) has been prepared by Telford Civil and is included at **Appendix CC**. It identifies the existing flood behaviour in the locality and assesses if the Proposal complies with the relevant flood controls, identifying any items to be resolved during the detailed design.

6.15.1 Methodology

A detailed two-dimensional (2D) flood study was carried out by Alpha Engineering to assess the flood risks associated with the Site. This study analysed the Site's hydrological and hydraulic characteristics, including flood depths, velocities, and potential mitigation measures. Strathfield Council approved this flood study on September 2021, as part of the approved Development Application (DA 2020/256). The flood model conducted by Alpha Engineering has been utilised to conduct the FIA between the pre-development scenario and the post-development scenario reflecting the updated development footprint.

The existing and proposed structures within the Site along with the external buildings within the neighbouring lots have been modelled as full obstructions for approaching water. Based on the site-specific survey and inspection, it was observed that a solid wall exists along the eastern boundary of the Site. This wall has been incorporated into the model to accurately assess the potential flooding on the Site, particularly from the eastern gas station, in both the pre- and post-development scenarios.

In relation to the Probable Maximum Flood (PMF) event and with reference to the Interim Flood Prone Land Policy, the PMF storm event is not a design storm event for assessing flood risk but is used for evacuation and shelter planning. Given the minor flood affectation at the site, the first floor is anticipated to be above any nearby PMF flood level. Accordingly, no PMF assessment has been undertaken.

6.15.2 Existing Environment

In the existing (pre-development) scenario, the 1% AEP event flood scenario is described as follows:

- The Site is minorly flooded during the 1% AEP event, with depths generally 100mm reaching a maximum of 354mm at the eastern side of the existing building (minor pocket) (refer to **Figure 50**);
- The flood level within the subject site is ranging between RL 9.4m (at the south-western corner) and RL 9.9m (at the eastern boundary) (refer to **Figure 50**); and
- The flood hazard within the subject site is categorized as low hazard (**Figure 51**).

It is identified the existing wall along the eastern boundary assists in blocking portion of the approaching water and minimizing the level of the inundation of the Site. The extent of impact in the pre-development scenario for the 1% AEP event is illustrated in **Figure 50** and **Figure 51** below.

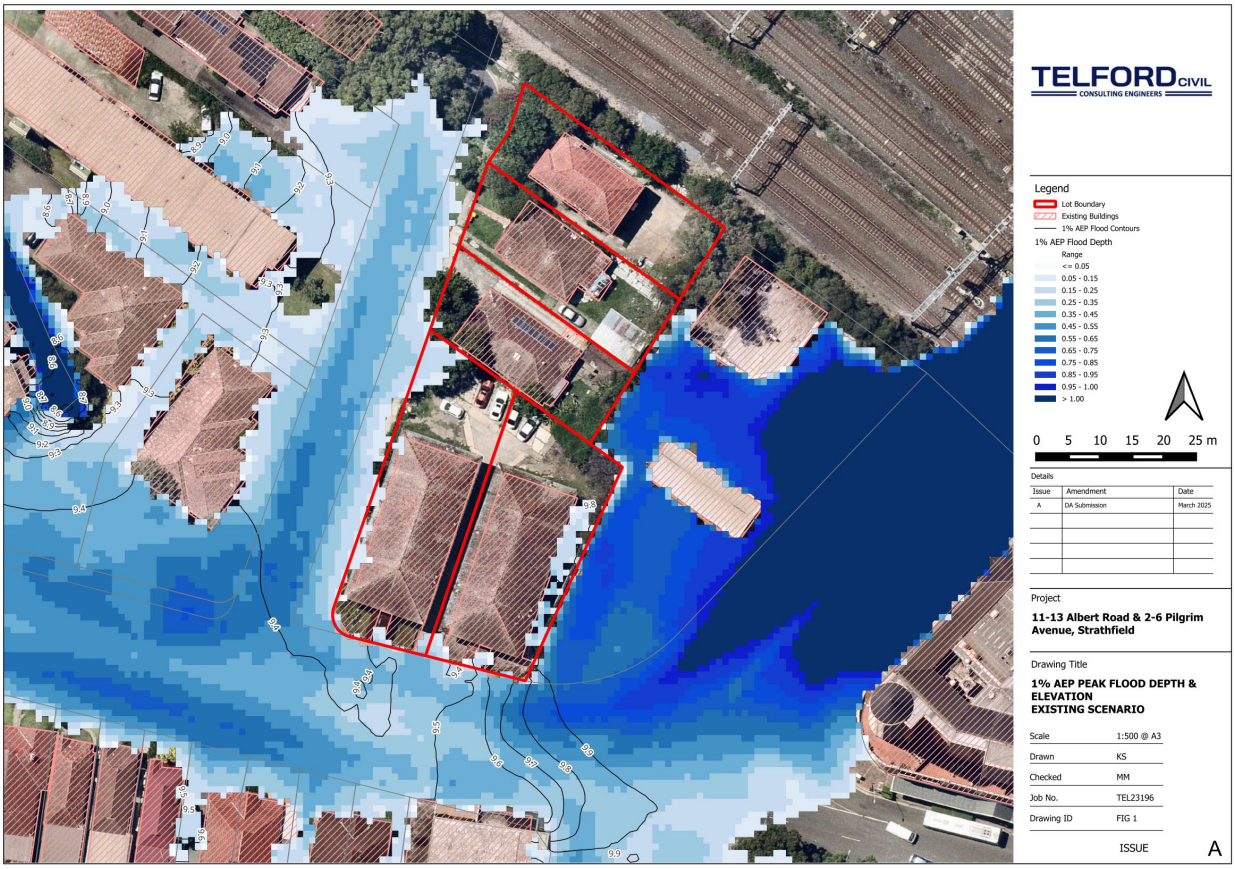


Figure 50 1% AEP Peak Flood Depth & Elevation – Pre-Development Scenario

Source: Telford Civil

Existing Flood Maps

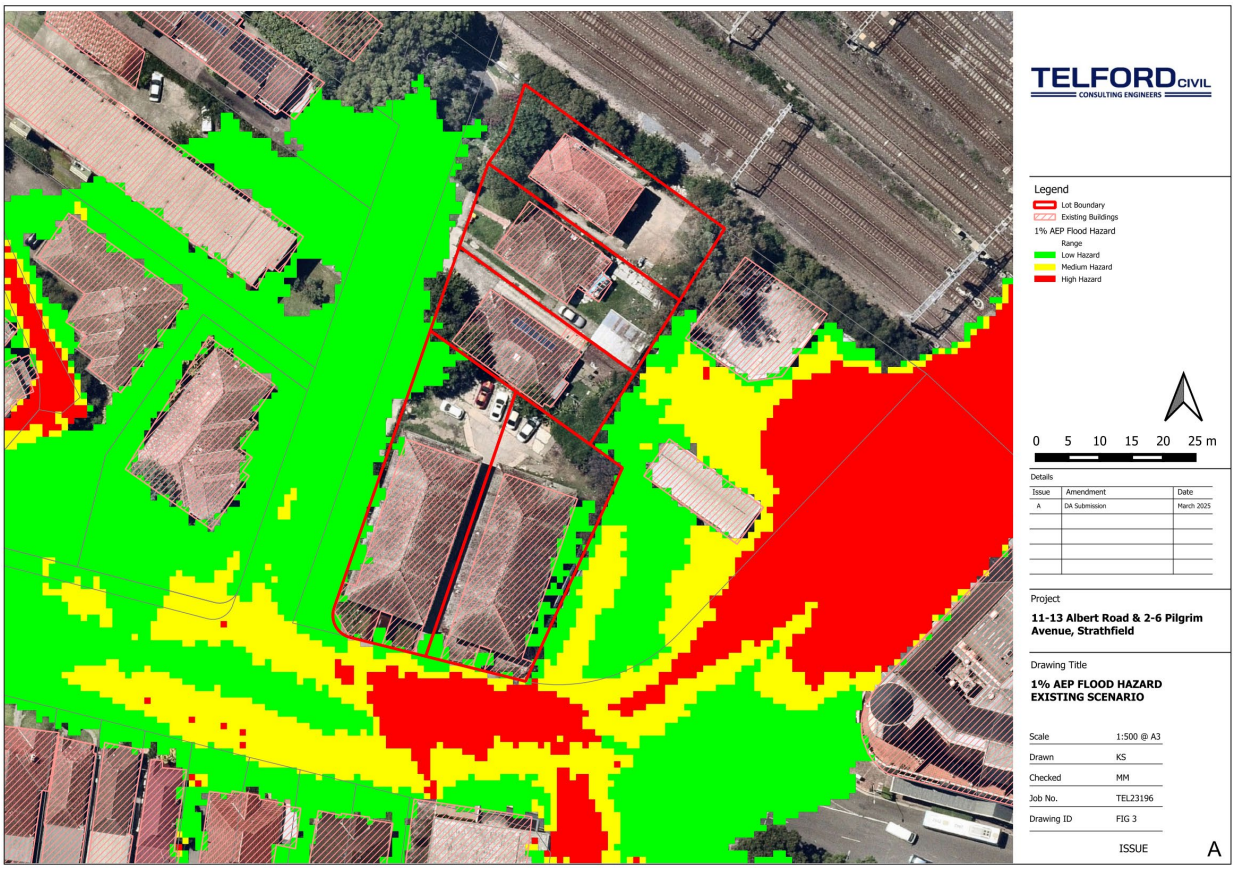


Figure 51 1% AEP Flood Hazard – Pre-Development Scenario

Source: Telford Civil

6.15.3 Assessment of Impacts

In the proposed (post-development) scenario, the 1% AEP event flood scenario is described as follows:

- The Site is minorly flooded during the 1% AEP event with depth generally 150mm to 200mm at the Site frontage and only scattered pockets up to 350mm (Figure 4-3 in **Appendix CC**);
- The flood level relative to the subject site is ranging between RL 9.4m AHD (at the south-western corner) and RL 9.9m AHD (at the eastern boundary) (Figure 4-3 in **Appendix CC**); and
- The flood hazard within the subject site is categorized as low hazard (Figure 4-4 in **Appendix CC**).

The extent of impact in the post-development scenario for the 1% AEP event is illustrated in **Figure 52** and **Figure 53** on the following page. The differences in flood surface elevations between pre- and post-developed 1% AEP has been assessed and summarized as follows:

- Decreases up to 47mm are witnessed at Albert Street;
- Negligible increases in flood levels within the nearby areas are up to maximum 9mm; and
- Increase in flood levels of up to 300mm at the south, eastern and western corners of the Site, within Albert Street.

The increase in flood levels occurs in a non-habitable area thus causing no aggravated risks to occupants. Further, the increase does not cause any previously flood-free space to become flood-affected and the findings align with the approved flood study by Alpha Engineering under the previous Development Application No. DA 2020/256.

In accordance with the Strathfield DCP 2005, the minimum habitable ground floor level for the Site should be RL 10.4m or greater, and minimum non-habitable ground floor should be RL 10.2m or greater. The Architectural Drawings (**Appendix B**) comply with these requirements. Further, the crest of the driveway located in 2 Pilgrim Avenue is not flood affected and no minimum flood planning level is to be applied.

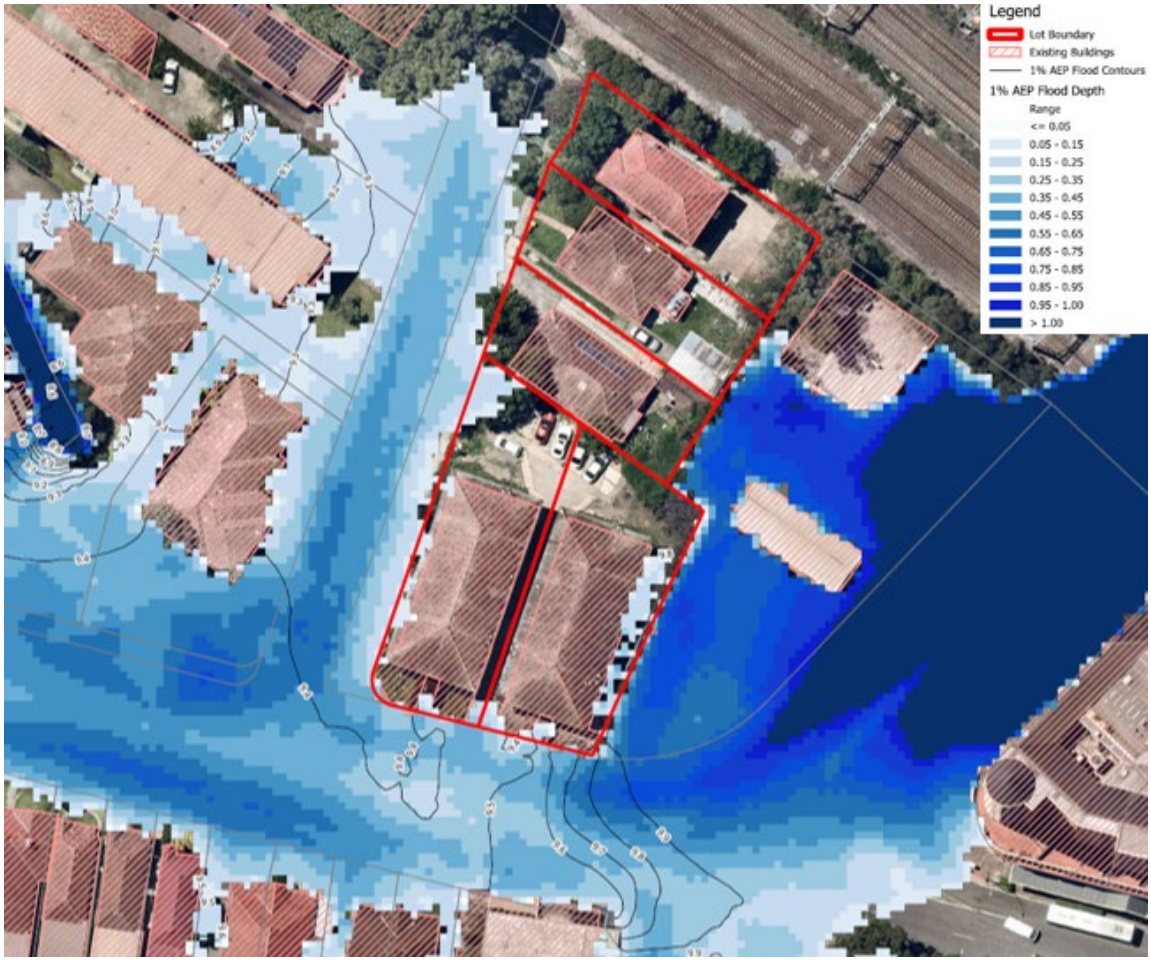


Figure 52 1% AEP Peak Flood Depth & Elevation – Post-Development Scenario

Source: Telford Civil

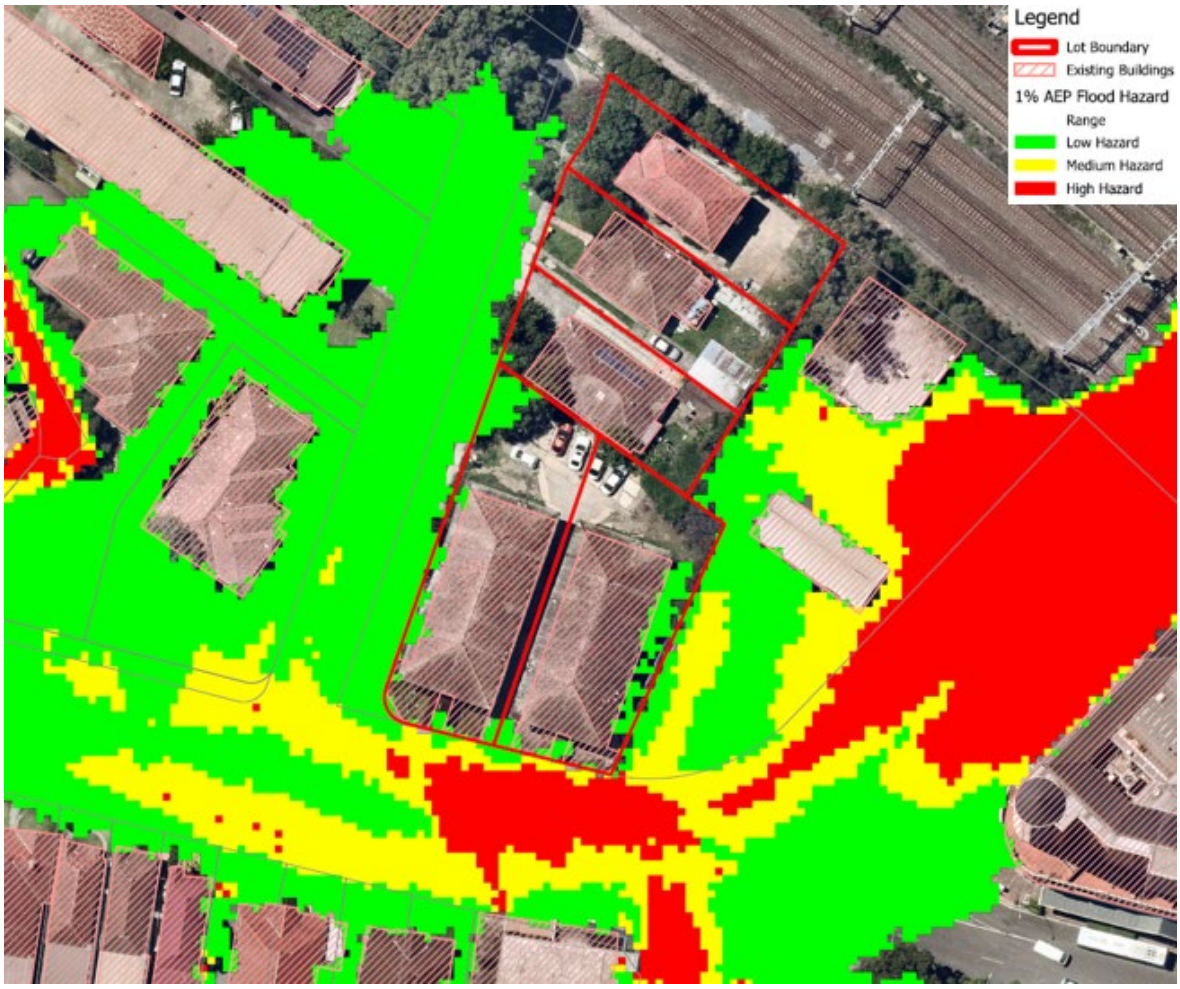


Figure 53 1% AEP Flood Hazard – Post-Development Scenario

Source: Telford Civil

6.15.4 Mitigation Measures

The proposed mitigation measures in relation to flood risk are outlined in **Table 38** below.

Table 38 Mitigation Measures – Flood Risk

Potential Impact	Mitigation Measure
Management of flood risk to future occupants	• Occupants must know the flood risk that their property is subjected to and be provided within relevant flood risk information and emergency contact information
	• In flooding up to the 1% AEP event, Residents/Visitors/Staff Members within the Basement level during the 1% AEP storm event are to seek refuge at Ground Level of the development (or higher). • In flooding events in excess of the 1% AEP event (PMF storm event), Residents/Visitors/Staff Members within the Basement Level or Ground Level during the PMF event are to seek refuge within Level 1 of the development (or higher).
	The following flood actions are to be made when a flood is likely: • Trained Personnel/Residents must monitor weather forecasts and flood predictions. • Trained Personnel/Residents must follow the site evacuation recommendations. • Trained Personnel/Residents must ensure that no moveable objects are kept on site to prevent flooding away from site. • Trained Personnel/Residents must move waste containers and poisons well above predicted flood heights.

Potential Impact	Mitigation Measure
	The following flood actions are to be made during a flood: • Trained Personnel/Residents must implement the evacuation plan. • Trained Personnel/Residents must be listening to local radio for updates of the situation and further advice. • Trained Personnel/Residents must make sure that power, water, and other utilities (gas, fuel, etc.) are completely turned off. • Trained Personnel/Residents must protect valuable machinery and equipment that cannot be relocated by enclosing in waterproof covers. • Trained Personnel/Residents must inform the emergency services with the flooding situation. • Residents must prohibit their children to play in, or near floodwater.
	The following flood actions are to be made after a flood: • No visitors are allowed to access the site in the same day of the flooding event. • Residents must keep listening to their local radio station for information, updates and advice. • Trained Personnel/Residents must check for damage to windows, walls and the roof and ensure the structural stability of their property. • Residents shall not eat food which has been in contact with floodwater. • Residents shall drink only boiled or bottled water if there is any chance of flood contamination of their drinking water. • Trained Personnel/Residents shall wear suitable clothing, including boots and gloves, when cleaning up. • Trained Personnel/Residents must not go sightseeing as this may hinder recovery efforts or put themselves and others at risk. • Gas appliances and gas bottles that have been exposed to floodwater will be inspected for safety before use. • Power, water and other utilities must be inspected by professionals before being turned on, and all affected site infrastructures will need to be cleaned and fixed. • A hazard assessment and proper work method must be undertaken to cover all flood affected work.

6.16 Bush Fire Risk

The Site or immediate surroundings are not identified as being 'bushfire prone land' for the purposes of Section 10.3 of the EP&A Act and is considered as being highly urbanised. Therefore, the Site is identified as containing a very low bushfire risk and a bushfire assessment is not necessary.

6.17 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by AMAC Archaeological and is included at **Appendix DD**. It assesses the impacts of the Proposal on the Aboriginal cultural heritage values, details consultation with Registered Aboriginal Parties (RAPs) and provides management recommendations if necessary.

6.17.1 Methodology

A survey of the Site was undertaken by AMAC Archaeological on 25 March 2024 and note that the overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low due to the extensive levels of disturbance and significant built environment.

The site investigation was conducted on foot with the entirety of the study area being inspected, however there were a number of limiting factors such as hard surfaces and structures encompassing the site. Any areas of exposed soil or areas of erosion were inspected in detail. All visible landscapes were inspected and photographed where details regarding land use and disturbance could be ascertained. Information regarding land surface and vegetation conditions were also collected during the survey. A general outline of the methods adopted during the survey are listed below:

- Field inspections will be carried out on foot.

- Attempts will be made to relocate the registered sites within the study area and assess their condition.
- Highly disturbed areas indicated on plans will be inspected to verify the level of disturbance and depending on level of disturbance will be included or excluded from the additional survey.
- Undisturbed areas will be inspected in as much detail as the remaining surface coverage and environment will allow and the results will be recorded.
- Areas of exposed ground such as tracks or eroded surfaces which allow good surface visibility will form the focus of the field inspections.

There have been a number of aboriginal archaeological studies conducted in the area by Heritage NSW Offices. A list of the most recent aboriginal archaeological studies and their findings is provided in **Table 39** below.

Table 39 Previous Archaeological Studies Within the Study Area

Date	Project	Consultant	Assessment
2022	Sydney Olympic Park Over and Adjacent Station Development	Artefact Heritage Services Pty Ltd	No sites were recorded during the archaeological survey and a low potential for archaeological deposits to remain was identified.
2022	Parramatta Over and Adjacent Station Development	Artefact Heritage Services Pty Ltd	This report noted that the development had no impact to ground surfaces and should therefore be allowed to continue without further assessment.
2020	Sydney Metro West	Artefact Heritage Services Pty Ltd	An unexpected finds procedure was recommended to be in place at: • Power supply routes at Westmead, Clyde and the Bays • Stations at Westmead metro, Sydney Olympic Park metro, North Strathfield metro, Burwood North, Five Docks and The Bays • Silverwater services facility Test/ salvage excavation was recommended at: • Parramatta metro station and The Bays Station • Parramatta power supply route
2019	Potts Hill to Alexandria transmission cable project	Aecom	It was determined that if excavation could be avoided within archaeologically sensitive areas, works could continue without further assessment. If excavation couldn't be avoided, an Aboriginal Cultural Heritage Management Plan would be required. Further assessment could then be performed on areas, such as near the Cooks River, a significant watercourse.
2018	1&2 Murray Rose Avenue, Sydney Olympic Park	Artefact Heritage Services Pty Ltd	No Aboriginal archaeological sites were located during the inspection.
2017	Plan of Management for Wangal Reserve and Punt Park	Montmare Consulting	The area had previously been identified to have Aboriginal and European Heritage Significance. Aboriginal heritage was determined due to the proximity to the river, enabling resource gathering, occupation or art sites.

Date	Project	Consultant	Assessment
2011	Australian Catholic University Campus, Strathfield	Niche Environment and Heritage Pty Ltd	No areas of scientific significance for Aboriginal archaeological values were identified across the site.

Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010).

6.17.2 Existing Environment

The environment that Aboriginal inhabitants lived in is a dominant factor in shaping their activity and therefore the archaeological evidence created by this activity. Not only will the resources available to the Aboriginal population have an influence on the evidence created but the survival of said evidence will also be influenced by the environment. Strathfield is located at an elevation of 20m, close to the significant water channels connected to the Sydney Harbour and the Paramatta River.

Disturbed terrain is generally present in areas that have undergone significant landscaping. This would have occurred for the railway infrastructure, located directly north of the study area. Soils are artificial fill which may contain demolition or local material. The Blacktown soil profile is located over much of the Cumberland Lowlands. The geology is Wianamatta Group – Ashfield Shale and Bringelly Shale occasionally underlain by Hawksbury Sandstone. Soils are typically shallow to moderately deep (>100cm) on crests, upper slopes and well drained areas and deep (150-300cm) on lower slopes and in areas of poor drainage.

The vegetation found in the study area is no longer in a native state and is comprised of a variety of introduced and noxious types of vegetation. This movement away from the natural vegetation is a result of extensive land clearing for farming, residential and urban development.

The Site is located 120m south-west of a first order tributary of Powells Creek and 1.6km southeast from an unnamed tributary from Canada Bay. These creek lines are known to have channelled Aboriginal activity to this area as an important resource within the landscape.

Aboriginal Heritage and Information Management System (AHIMS) is an online database maintained by Heritage NSW. This contains all the previously recorded Aboriginal archaeological sites registered with Heritage NSW. An AHIMS extensive 1km search was conducted on 08/07/2024 (ID-908004). This search resulted no registered sites within 1km of the study area. No registered sites were identified within the study area.

6.17.3 Assessment of Impacts

The two (2) main values addressed when assessing the significance of Aboriginal sites are cultural values to the Aboriginal community and archaeological (scientific) values.

Aboriginal Community Value

No elements of social, historical or aesthetic cultural heritage significance specifically linked to the study site have been identified or shared during the stages of Aboriginal community consultation.

Archaeological Values

The results of the site inspection showed low visibility of archaeological activity due to extensive development in the area. A search of the AHIMS database has identified no registered sites or objects within 1km of the study area. The site is located within 120m of a first order tributary and thus Aboriginal occupation of this area is likely to have been only transitory. The 20th century development of the site has significantly disturbed the site and as such the site is assessed as having nil-low archaeological potential for evidence of Aboriginal occupation.

Conclusion

The archaeological assessment has determined that the study area has low potential to contain any Aboriginal objects or sites due to the extensive disturbance that will have destroyed any potential surface Aboriginal sites or subsurface deposits. As there is low potential for Aboriginal objects to be present there is nil to negligible risk of direct or indirect impacts to Aboriginal heritage in the study area.

6.17.4 Mitigation Measures

The proposed mitigation measures in relation to Aboriginal cultural heritage are outlined in **Table 40** below.

Table 40 Mitigation Measures – Aboriginal Cultural Heritage

Potential Impact	Mitigation Measure
Continued consultation with Aboriginal groups	• Consultation with the Registered Aboriginal Parties will continue throughout the duration of the redevelopment of the Site. In accordance with the DECCW (2010c) guidelines, consultation of this project will be maintained via email to RAPs every 6 months.
Unexpected finds	• Heritage inductions and documentation such as Unexpected Finds Protocols (UFP) will be in place during the construction phase to provide steps to minimising harm to any unexpected Aboriginal objects or archaeological material. Any UFP will detail stop works procedures for both the exposure of Aboriginal archaeological deposits/objects and human remains

6.18 Environmental Heritage

The assessment of environmental heritage is supported by a review of the environmental heritage impacts of the Proposal on the heritage significance of the surrounding area and heritage items in proximity to the Site.

6.18.1 Methodology

This section has been prepared with consideration from the heritage impacts identified on the heritage significance of environmental heritage (heritage items listed on a statutory heritage list). It has been with consideration of the NSW heritage guidelines (Heritage Office, 2001) and the Burra Charter (Australia ICOMOS, 2013).

Ethos Urban has conducted a desktop review of any environmental heritage items or relics within 400m of the Site. The significance of these items has been investigated and assessed in order to determine whether a Statement of Heritage Impact (SOHI) is required to outline an appropriate management strategy.

6.18.2 Existing Environment

The Site does not include any items of heritage significance under an Environmental Planning Instrument (EPI). However, a number of state and local heritage items have been identified as being located in 400m to the Site (illustrated in **Figure 54**):

State Register:

- Strathfield Railway Station group (Listing no. 01252) – approx. 100m
- Strathfield rail underbridges (flyover) (Listing no. 01055) – approx. 50m

Local Significance:

- "Wairuna"—Victorian Italianate style house (Item no. I95) – approx. 290m
- "Verani"—Victorian villa (Item no. I139) – approx. 340m
- St Anne's Anglican Church—church, school hall and rectory (Item no. I143) – approx. 370m
- Street Trees (item no. I1342) – approx. 150m
- House (item no. I335) – approx. 210m
- House (Item no. I284) – approx. 210m
- House (Item no. I426) – approx. 300m
- House (Item no. I427) – approx. 270m
- Inter-War Flats (Item I548) – approx. 215m

Heritage Conservations Areas

- Churchill Avenue Conservation Area, Federation houses group (Item no. C10) – approx. 165m
- Homebush Road Conservation Area (Item no. C11) – approx. 410m

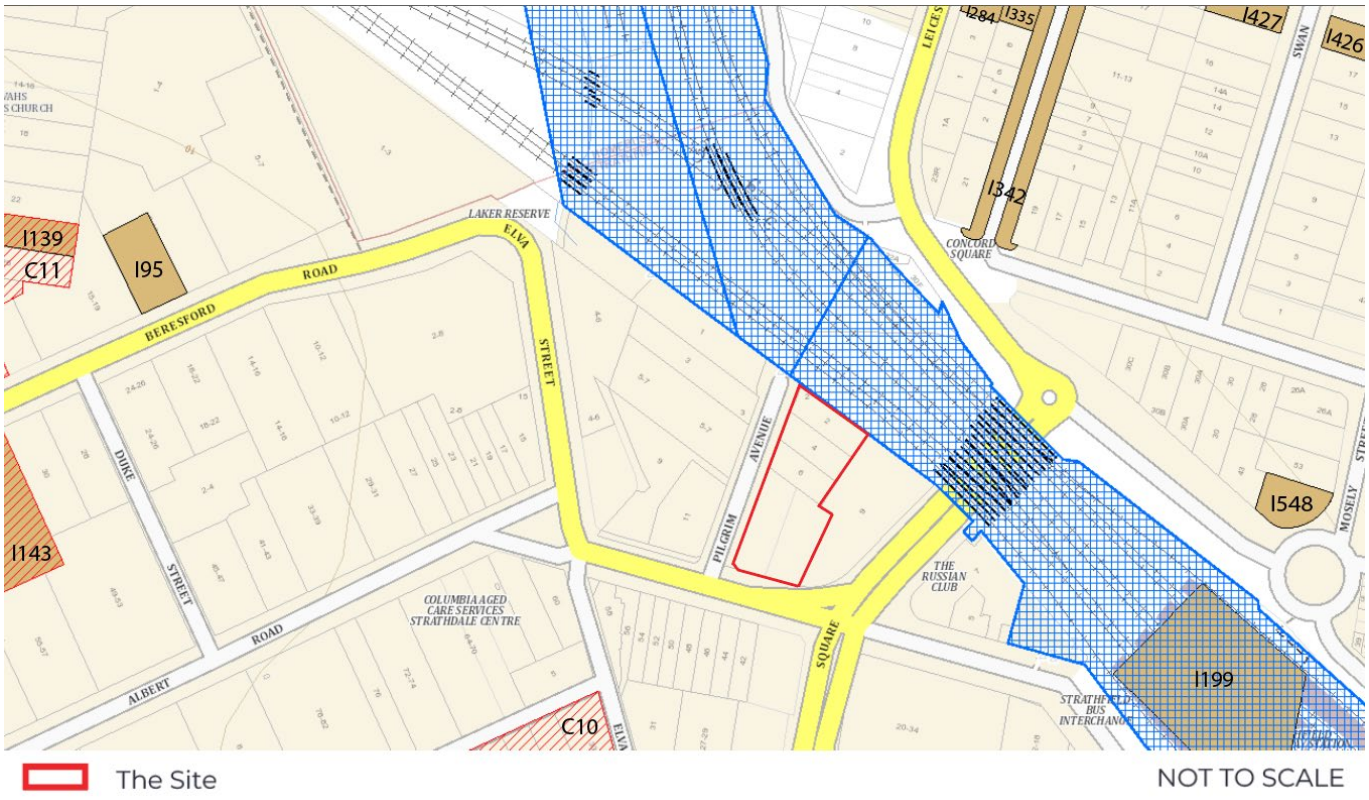


Figure 54 Heritage Map

Source: NSW Planning Portal Spatial Viewer, edits by Ethos Urban

The Site currently contains three two-storey flat buildings and two detached dwellings, which were developed in the 20th century. Strathfield began to be developed around the 1870s with the first residential subdivisions being offered for sale on large lots of land. The area was desirable for residential development due to the opening of Strathfield Railway Station in 1876. In the 20th century a development boom occurred with a shift away from large-lot mansions into smaller suburban homes on quarter acre blocks.

Historical aerials from the 1940s show structures already present in all lots of the site likely dating to the early 1900s. From 1943 onwards, historical aerials show lot 2 Pilgrim Avenue to have structures making every lot on the site to be developed. The site has not changed since the construction of a residential flat building at 2 Pilgrim Avenue where all original structures still exist.

6.18.3 Assessment of Impacts

Impact on Surrounding Heritage Items

The potential impacts on the surrounding heritage items by the Proposal are summarised in **Table 41** below.

Table 41 Impacts on Surrounding Heritage

Item No.	Surrounding Heritage Item	Assessment
State Heritage Items		
01252	Strathfield Railway Station group	The proposal will have no direct impact on the significance of the railway station. It will change the setting of the station to the west, but this is consistent with the desired future character of the character area and has or will be realised by the bookending of the Shell petrol station to the east. The impacts of the Proposal on the heritage values of Rhodes Railway Station Group would be consistent with the impacts of Sandalwood Apartments on the corner of Albert Road and Raw Square.
01055	Strathfield rail underbridges (flyover)	
Local Significance		
I95	"Wairuna"—Victorian Italianate style house	The proposal will have no direct impact on the locally significant "Wairuna" Victorian Italianate style house. As the heritage building is located approximately 290m to west of the proposal, impacts to overshadowing will be non-existent. The proposed development is

Item No.	Surrounding Heritage Item	Assessment
		located on a quiet cul-de-sac making variations to traffic flows in front of the heritage site minimal.
I139	"Verani"—Victorian villa	The proposal will have no direct impact on the locally significant "Verani" Victorian villa. As the heritage building is located approximately 340m to west of the proposal and currently surrounded by medium to high rise residential flat buildings, impacts to overshadowing will be non-existent. The proposed development is located on a quiet cul-de-sac making variations to traffic flows in front of the heritage site minimal.
I143	St Anne's Anglican Church—church, school hall and rectory	The proposal will have no direct impact on the locally significant St Anne's Anglican Church site which includes the church, school hall and rectory. As the heritage building is located approximately 370m to west of the proposal, impacts to overshadowing will be non-existent. The site is located a decent distance outside of the Homebush Road Conservation Area, concerns relating to out-of-character designs do not relate.
I1342	Street Trees	The proposal will have no direct impact on the locally significant street trees on Manson Road. As the heritage listed trees are located on the northern side of the railway tracks and the closest tree being located approximately 150m away, the proposal will not create any overshadowing impacts.
I335	House	The proposal will have no direct impact on the locally significant house at 10 Manson Road, Strathfield. As the heritage dwelling is located approximately 210m north of the proposal impacts to overshadowing will be non-existent. The heritage dwelling has no direct road connection to the proposed development thus making impacts to traffic non-existent.
I284	House	The proposal will have no direct impact on the locally significant house at 5 Leicester Avenue, Strathfield. As the heritage dwelling is located approximately 210m north of the proposal impacts to overshadowing will be non-existent. The proposed development is located on a quiet cul-de-sac making variations to traffic flows in front of the heritage site minimal.
I426	House	The proposal will have no direct impact on the locally significant house at 19 Swan Avenue, Strathfield. As the heritage dwelling is located approximately 300m north of the proposal impacts to overshadowing will be non-existent. The proposed development is located on a quiet cul-de-sac making variations to traffic flows in front of the heritage site minimal.
I427	House	The proposal will have no direct impact on the locally significant house at 20 Swan Avenue, Strathfield. As the heritage dwelling is located approximately 270m north of the proposal impacts to overshadowing will be non-existent. The proposed development is located on a quiet cul-de-sac making variations to traffic flows in front of the heritage site minimal.
I548	Inter-War Flats	The proposal will have no direct impact on the locally significant house at 41 Everton Road, Strathfield. As the locally significant Inter-War block of flats is approximately located 215m north of the proposal, impacts to overshadowing will be non-existent. The proposed development is located on a quiet cul-de-sac making variations to traffic flows in front of the heritage site minimal.
Heritage Conservations Areas		
C10	Churchill Avenue Conservation Area, Federation houses group	The site is located a decent distance outside of any heritage conservation area making impacts of the proposed development minimal.
C11	Homebush Road Conservation Area	

Archaeological Heritage

The Site is identified as containing low archaeological potential for significant archaeological resources to exist on the Site. The past European land use has led to significant land clearing for residential and industrial activities. This area has been highly utilised due to the proximity to both watercourses and the Sydney CBD. The Main Western Line is visible in the earliest available aerial, dating to 1930 and continues to be visible in all subsequent aerials presented in **Figure 55** and **Figure 56**. This 1930 aerial has only one (1) discernible structure within the boundary of the Site, however by 1943, all allotments contain structures.

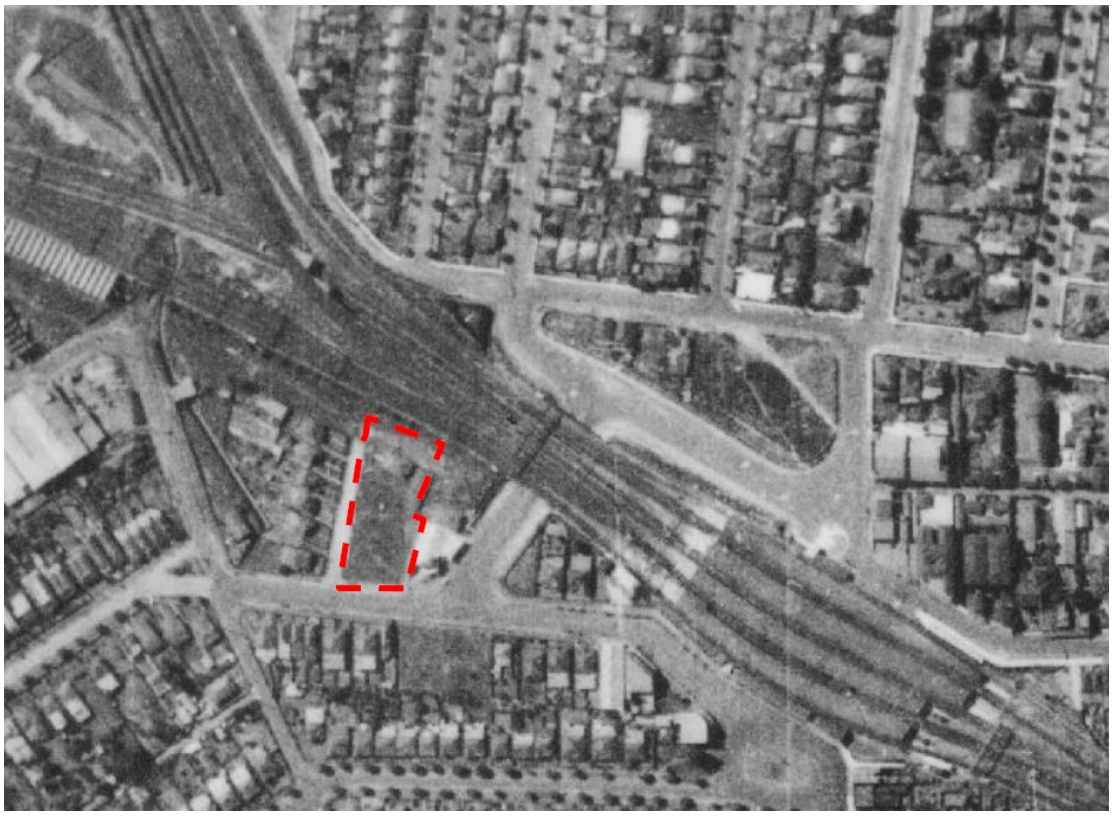


Figure 55 1930 Aerial of Study Site

Source: Historical Imagery Viewer

Figure 56 1943 Aerial of Study Site

Source: Historical Imagery Viewer

No elements of social, historical or aesthetic cultural heritage significance specifically linked to the study site have been identified or shared during the stages of Aboriginal community consultation. A search of the AHIMS database has identified no registered sites or objects within 1km of the study area. The site is located within 120m of a first order tributary and thus Aboriginal occupation of this area is likely to have been only transitory. The 20th century development of the site has significantly disturbed the site and as such the site is assessed as having nil-low archaeological potential for evidence of Aboriginal occupation.

6.18.4 Mitigation Measure

The proposed mitigation measures in relation to environmental heritage are outlined in **Table 42** below.

Table 42 Mitigation Measures – Environmental Heritage

Potential Impact	Mitigation Measure
Discovery of archaeological finds	• In the unlikely event that any potential archaeological resources are uncovered during any site works, the following must be undertaken: - All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer will be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment. - The Site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist. - The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Heritage NSW will be notified of the find through a Section 146 notification. Such management may require further consultation with the approval authority, preparation of a research design and archaeological investigation/salvage methodology - Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken. - Reporting may need to be prepared regarding the find and approved management strategies. - Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.
Discovery of human remains	• In the unlikely event that human remains are uncovered during any site works, the following must be undertaken: - All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. - The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555). - The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist. - Management recommendations are to be formulated by the NSW Police, Heritage NSW, site representatives and the RAPs. - Works are not to recommence until the find has been appropriately managed.

6.19 Public Space

A Public Space Plan has been prepared and included within the Design Report prepared by Kennedy Associates Architects included at **Appendix K** respectively. A Crime Prevention Through Environmental Design (CPTED) Report has also been prepared by Ethos Urban and iFLkiks included at **Appendix EE**. It assesses the crime risk of the development and prevention methods in accordance with the *Crime prevention and the assessment of development applications* (NSW Department of Urban Affairs and Planning, 2001).

6.19.1 Public Domain Plan

The Public Space Plan has been designed to maximise the amount of public space in addition to that proposed within the Site to ensure a comfortable and inviting pedestrian experience. The Site, being bounded by a major road, railway line and petrol station has very little opportunity to provide meaningful public space, other than along Pilgrim Avenue. The project proposes a number of significant improvements to the public realm along Pilgrim Avenue and, to a lesser extent, Albert Road, including:

- Remaking and widening of the footpath along the eastern side of Pilgrim Avenue;
- Provision of short-term parking spaces, vehicular drop-off and bicycle parking along Pilgrim Avenue;
- Provision of series of large deep soil planters along the street verge of Pilgrim Avenue;
- Integration of the street frontage within the overall landscape design of the development;

- Planting of an avenue of street trees along both Pilgrim Avenue and Albert Road;
- Provision of public seating along Pilgrim Avenue;
- Provision of a series of generous stairs within the building along its street frontages connecting the footpath to both Albert Road and Pilgrim Avenue;
- Provision of a public colonnade connecting both buildings and providing access to the commercial spaces from both Albert Road and Pilgrim Avenue;
- Provision of a series of stepped planters along both street frontages connecting the colonnade to the footpath on both Albert Road and Pilgrim Avenue; and
- Provision of a dedicated seating areas within the colonnade for potential café seating

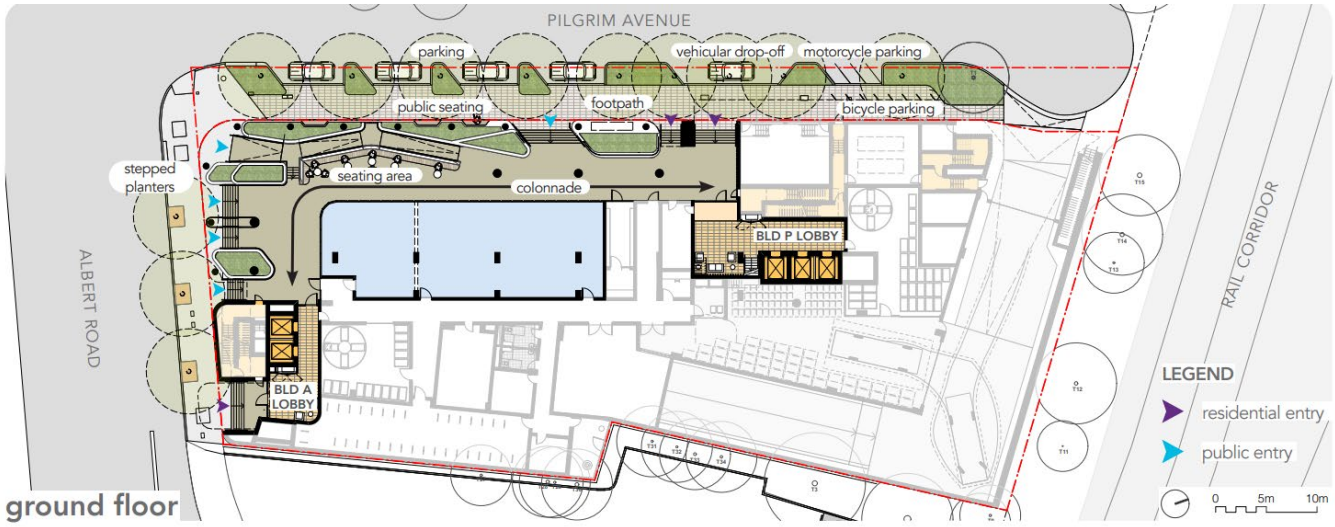


Figure 57 Public Space Plan

Source: Kennedy Associates Architects

6.19.2 Crime Prevention Through Environmental Design

The CPTED Report (**Appendix EE**) identifies the potential security concerns in and around the Site and provides recommendations to guide crime prevention, safety and security arrangements as part of detailed design of the development.

The NSW Crime Prevention and Assessment of Development Applications Guidelines (Department of Urban Affairs and Planning, 2001) assert that a formal crime risk assessment must be undertaken for developments likely to create a risk of crime. It identifies four (4) principles to be used in development application assessments being surveillance, access control, territorial reinforcement and space management.

A summary of the CPTED assessment is provided in **Table 43** below.

Table 43 CPTED Assessment Summary

CPTED Principle	Assessment
Surveillance: ensuring people feel safe in public areas where surveillance can deter crime	• The site's locality has good opportunities for passive surveillance associated with its proximity to areas of high activity • The ground floor retail portion of the development will activate the site and provide greater opportunities for the surveillance of public space • An appropriate level of residential privacy is achieved • The sitting of the building allows sightlines through the site, and to site boundaries.
Access control: strategies to restrict, channel and encourage the movement of people and vehicles	• Swipe cards will be used to manage access to the private residential and commercial areas. • A concierge desk will be provided in the market lobby. • The car lift will be accessible via a swipe card • Sliding doors to the lobbies will be automatically locked outside of core hours.
Territorial reinforcement: where places that feel owned and cared for are likely to be used and enjoyed	• The high-quality architectural design and maintenance of landscaping will signal a high level of care. • The proposed setbacks of the building signify ownership. • The separation between residential and commercial lobbies limit access. • The affordable housing lobby and the market housing lobby will not communicate a different level of security or maintenance.
Space/activity management: the formal supervision, control and care of the development	• The affordable housing component will be professional managed by a Tier 1 community housing provider who will be responsible the maintenance and upkeep of this part of the development. • The market housing will include a concierge service which will provide formal guardianship and surveillance of the lobby area. • The commercial lobby will be managed by the strata, noting that there will be a wider building manager.

Source: Ethos Urban

6.20 Hazards and Risks

The Proposal will remain within the screening thresholds for different classes of dangerous goods established under *Applying SEPP 33* (NSW Department of Planning, 2011) and remain compliant with Chapter 3 of the Resilience and Hazards SEPP. The proposed development is for residential and commercial uses, and the proposal will not store any dangerous goods and is not located on any high-pressure pipelines.

For further details on the Site, refer to the Survey Plan (**Appendix G**).

6.21 Contributions and Public Benefits

The Applicant does not propose a Voluntary Planning Agreement (VPA) or alternative public benefit arrangement. As such, the applicable local and state monetary contributions are outlined in the following subsections.

6.21.1 Local Contributions

Section 7.11 Contribution

Section 7.11 of the EP&A Act allows a consent authority to levy developer contributions towards the cost of providing local public infrastructure and facilities. The *Direct Development Contributions Plan 2010-2030* (Strathfield Council, 2019) applies to the Site which is identified as being within Precinct 4 in the LGA.

6.21.2 State Contributions

The Housing and Productivity Contribution (HPC) came into effect on 1 October 2023 to help fund the delivery of infrastructure in high-growth areas. It applies to the Site with the following rates to potentially apply to the development:

- $10,000 per dwelling;

- $30 per square metre of new commercial GFA.
- $30 per square metre of new retail GFA.

The HPC is to be paid before the issue of the first construction certificate in relation to the development and the rates are indexed quarterly based on the Producer Price Index. It is noted discounts are included as part of the phasing in of the contribution, with a 25% discount available if paid before 30 June 2025.

7.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The Proposal involves a new mixed-use shop top housing development including in-fill affordable housing, as outlined in **Section 3.0**. The assessment must, therefore, focus on the identification and appraisal of the effects of the proposed change over the Site's existing condition.

In considering the justification of the proposed development and in reference to Section 4.15 of the EP&A Act which specifies matters that a consent authority must take into account when determining a Development Application, the following matters have been considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the proposed development while still achieving the objectives of the project;
- Consistency with the strategic context;
- Consistency with the statutory requirements;
- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality;
- The suitability of the Site for the development; and
- The public interest.

7.1 Design of the Proposed Development

The design of the Proposal has responded to the surrounding context, providing an appropriate distribution of mass and overall design of the proposal demonstrates a high standard of design quality to ensure that it is commensurate with the surrounding natural and built environment.

Furthermore, the proposed landscaping will result in an improved outcome for the built environment with its existing condition underutilised and characterised by exotic species. The proposed implementation of ESD measures will also ensure that the Proposal does not have adverse environmental impacts.

7.2 Consistency with the Strategic Context

The strategic context for the Proposal has been discussed in **Section 2.0** of the EIS, and demonstrates the Proposal is considered to be consistent with the relevant strategic context.

7.3 Consistency with the Statutory Requirements

The relevant statutory requirements have been discussed in **Section 4.0** and assessed in **Appendix C**. Specifically, this EIS has addressed all of the matters specified in the SEARs (refer to **Appendix A**) and Section 190-192 of the EP&A Regulation (refer to **Appendix C**).

The Proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact. Specifically, the Proposal is consistent with the Objects of the EP&A Act as:

- It positively contributes to housing supply and affordability through the delivery of 35 affordable housing dwellings and 193 build-to-sell dwellings to accommodate the growing population of the Strathfield LGA and Greater Sydney Region more broadly;
- It promotes the orderly and economic use of land by redeveloping an underutilised site to facilitate the highest and best use, providing housing in a highly accessible location;
- It embeds ESD principles through a range of design and operation initiatives;
- It does not result in any adverse impacts to threatened species or ecological communities, as demonstrated by the granted BDAR Waiver;
- It generates employment opportunities during the construction and operational phases;

- It incorporates good design and amenity of the built environment, as demonstrated in the Design Report (**Appendix K**).
- It does not adversely impact Aboriginal cultural heritage and designing with Country has informed the design to ensure it is built into a celebrated within the Proposal; and
- The project team has undertaken consultation and feedback with relevant stakeholders.

7.4 Stakeholder Views

During the preparation of the EIS, extensive consultation with the community has been undertaken by The Social Aspect, as detailed in **Section 5.0** and the Community Engagement Table (**Appendix D**).

The project team are committed to ongoing community consultation following the submission of the EIS, including during the exhibition and assessment of the project and following a determination. Following its submission, the DPHI will exhibit the EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, the DPHI may require the applicant to prepare a Submissions Report in response to issues raised.

7.5 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the Proposal, the likely impacts of development are considered acceptable as outlined in the following sections. Additionally, the proposed mitigation measures detailed within **Section 6.0** will mitigate and manage the impact of the Proposal. A consolidation list of proposed mitigation measures is provided at **Appendix E**.

7.5.1 Natural Environment and Built Environment

The EIS has demonstrated that the Proposal adopts appropriate management strategies and will generate acceptable environmental impacts, due to the proposed mitigation measures and the design of the development.

The Site is located within a highly urbanised built environment, and the Proposal evidently contributes to the Site's capacity to align with the future desired character of the area. The proposed distribution of building mass and overall design of the proposal demonstrates a high standard of design quality to ensure that it is commensurate with the surrounding natural and built environment. Furthermore, the proposed landscaping measures, result in an improved outcome for the natural environment of the Site, as its existing condition is underutilised and characterised by exotic species. The proposed implementation of ESD measures will also ensure that the proposed development does not have adverse environmental impacts.

All relevant environmental impacts are addressed within **Section 6.0** and determined to be acceptable subject to implementation of the proposed mitigation measures set out at **Appendix E.**

7.5.2 Social and Economic

An assessment of the likely social impacts of the project has been undertaken in the SIA (**Appendix BB**) which confirms that the Proposal will generate the following positive social impacts:

- Supply of contemporary, well-located and diverse housing, including affordable housing in the Strathfield LGA;
- Improved urban experience and opportunity to Connect with Country for residents, workers and visitors.
- Economic benefits during construction and operation.

Any negative social impacts arising from the development, including changes to sense of place, cumulative construction impacts and cumulative demand on social infrastructure can be appropriately mitigated through the proposed mitigation measures (**Appendix E**).

The Proposal will generate a positive economic impact through the creation of an estimated 221 full time construction jobs. The provision of affordable housing will also have flow on economic benefits as prospective affordable housing residents will be provided with affordable rental rates, reducing the proportion of their income spent on rent.

7.6 Community Views

Extensive consultation with the community has occurred in preparation of this proposal. Detail of the community views which were portrayed as a result of the engagement processes is provided in **Section 53** and the Community Engagement Report at **Appendix D.**

7.7 Suitability of the Site

Having regard to the characteristics of the Site and its immediate surrounding context, the Proposal is suitable for the Site for the following reasons:

- It is located within the MU1 Mixed Use zone, and strongly aligns with the objectives of the zone pursuant to the Strathfield LEP 2012 as it exemplifies a true mixed-use development that integrates both commercial and residential land uses, activating the ground plane;
- In its current form, the Site is underutilised and does not represent the highest and best use with the potential to create a landmark development at the western gateway to the Strathfield Town Centre;
- It is generally compliant with the statutory controls under the Strathfield LEP 2012 and Environmental Planning Instruments;
- It is in close proximity to a range of high-frequency public transport options, including the Strathfield Station, approximately 200m to the east of the Site;
- It responds to the surrounding context by positioning building mass accordingly and strong façade articulation;
- It will not result in any adverse environmental impacts and any impact can be appropriately managed and mitigated; and
- It is not affected by significant constraints on the Site such as bushfire hazards, endangered species and contamination or hazardous materials.

7.8 Public Interest

Having regard to the public interest, the Proposal is considered to be in the public interest for the following reasons:

- It will contribute to the supply of affordable housing in the Strathfield LGA, directly responding to the NSW Government's policy to deliver affordable housing for very low to moderate income households;
- It will provide new housing supply within Strathfield Town Centre, supported by close proximity to Strathfield Station and services within the town centre;
- It will revitalise a currently underutilised strategic site to provide increase amenity to the public domain and activation of the Strathfield Town Centre; and
- It will support convenience for the future and existing residents of the locality through provision of two (2) commercial tenancies, whilst also stimulating the ground plane to create a vibrant and active public domain.

8.0 Conclusion

This EIS has been prepared on behalf of Convertia Pty Ltd in support of a SSDA (SSD-80432461) for a proposed mixed use development with in-fill affordable housing (the Proposal) located on land at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield. The Proposal is for the purposes of residential development including in-fill affordable housing within the Greater Sydney Region with an EDC of more than $75 million. Therefore, in accordance with Schedule 1, Section 26A of the Planning Systems SEPP, it is declared to be SSD for the purposes of the EP&A Act.

The NSW Government has established a fundamental policy objective of delivering more housing in accessible locations in response to the current housing affordability crisis. It has introduced an in-fill affordable housing policy that supports a HOB and FSR bonus of 20-30% for development that includes 10-15% affordable housing, has an EDC over $75 million in Greater Sydney, and is located in an accessible area.

This Proposal seeks to utilise the in-fill affordable housing bonus available under Chapter 2, Part 2, Division 1 of the Housing SEPP that enables up to a 30% uplift on the existing HOB (54m) and FSR (5:1) development standards under the Strathfield LEP 2012. The Proposal satisfies the requirements of the Housing SEPP by delivering a 15.35% affordable housing contribution through the provision of 35 affordable housing dwellings within the total of 228 dwellings. A HOB and FSR bonus of 30% is therefore available, with the Proposal seeking consent for a HOB of 70.2m (30% uplift) and FSR of 6.49:1 (29.8% uplift), both of which comply with the relevant standards inclusive of the bonus.

This EIS has been prepared to consider the natural environment, built environment and social and economic impacts of the proposed mixed-use shop top housing development including in-fill affordable housing at the Site. The EIS has addressed the issues outlined in the SEARs and accords with Section 190-192 of the EP&A Regulation.

Having regard to environmental and economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the Proposal is justified for the following reasons:

- It is permissible with consent and is consistent with the objectives of the MU1 Mixed Use zone under the Strathfield LEP 2012;
- It meets the relevant statutory requirements of the relevant Environmental Planning Instruments including the Strathfield LEP 2012, with exception of the proposed exceedance to the FSR development standard due to the requirement for wintergardens which is justified and supported by a Clause 4.6 Variation;
- It will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- It is a direct response to the NSW Government's affordable housing policy and need for more dwellings that are well located, delivering 35 affordable units and 193 market units, which will contribute to local, State and national housing targets;
- It will provide a diverse supply of dwellings, ranging from one (1) bedroom to three (3) bedroom apartments to meet the housing and social needs of future residents;
- It provides a high-quality architectural and landscape design that offers a range of housing types, communal facilities, and gathering spaces that will contribute to a safe, secure and active environment;
- It provides a high standard of residential amenity for all residents within the site that is consistent with the objectives of the Apartment Design Guide (ADG), as well as protecting the visual privacy, overshadowing, and solar amenity of surrounding residential properties; and
- It is suitable for the Site and in the public interest.

For the reasons above, the Proposal is considered supportable and appropriate for approval