

Response to Submissions and Amendment Report

Infill Affordable Housing
Development – Edmondson Park
Block 20a

SSD-99909708

PREPARED FOR

The Savills logo features the word "savills" in a white, lowercase, sans-serif font, set against a solid yellow rectangular background.

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Version No. Draft Issue Date: Final Date:	30 July 2026 5 August 2026
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Acknowledgment of Country

In the spirit of reconciliation, Savills acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to Elders, past, present and emerging.

1 Introduction

This Response to Submissions (RtS) and Amendment Report has been prepared by the Property Consultancy division of Savills on behalf of Landcom (the Applicant). This report is submitted to the Department of Planning, Housing and Infrastructure (DPHI) to address submissions and key issues raised during the public exhibition of the State Significant Development Application (SSD-99909708).

Landcom submitted the application for a mixed use, infill affordable housing development at Edmondson Park known as Block 20a to DPHI in April 2026. The Environmental Impact Statement (EIS) was placed on public exhibition from Tuesday 19 May 2026 until Monday 1 June 2026. A total of seven (7) submissions were received from government agencies and organisations, and one (1) submission was received from a member of the public. In addition, DPHI issued a Request for Information letter highlighting several key issues that require additional detail and consideration.

A summary of the project as exhibited is detailed below in **Section 1.1** of this report.

The feedback from all the stakeholders and members of the general public have been collated and considered. The relevant issues are addressed in **Section 4** of this report. In response to the submissions received, key issues to be addressed and through the detailed design development phase, several minor refinements and amendments to the building design have been incorporated at this stage. The changes are minor in scope and will not alter the building footprint, envelope and overall built form outcome. They will however improve the functionality and amenity of the building for future residents and will avoid the need for modification applications in the future.

This RtS and Amendment Report provides an analysis of the submissions, key issues raised, actions taken since exhibition and provides associated technical reporting to support and justify the changes and amendments to the design as proposed.

This report and the minor design changes proposed has been prepared in accordance with the provisions of Section 37 and 59 of the *Environmental Planning and Assessment Regulation, 2021* (EP&A Regulation) and DPHI's *State Significant Development Guidelines, Appendix C* (Preparing a Submissions Report) and *Appendix D* (Preparing an Amendment Report) and aims to satisfy the provisions of Section 4.39(e) of the *Environmental Planning and Assessment Act, 1979* (as amended) (EP&A Act)

1.1 Proposed development

The proposed development is on land identified as future Lots 401 and 402, Buchan Avenue, Edmondson Park and the development is also referred to as Block 20a (**the Site**).

The application SSD-99909708 is seeking approval for a mixed-use, affordable housing development that involves the following works (description as part of the exhibition);

- Excavation to create one single basement parking level containing 58 car parking spaces, 5 motorbike spaces and 172 bicycle spaces including ancillary services and infrastructure;

The construction of three (3) interconnected buildings including;

- a 15-storey mixed use building comprising:
 - A ground floor retail tenancy;
 - 123 affordable housing apartments;
- a 9-storey residential flat building comprising:
 - 45 affordable housing apartments.
- A two-storey residential flat building comprising four affordable housing apartments.
- Parking at ground level including five (5) car parking spaces, one (1) motorbike spaces and four (4) bicycle spaces.
- Parking at ground level includes 3 dedicated car share spaces.
- Communal open space, a public open space through link, landscaping and public domain works.

The development includes a variety and diversity of housing types, and the ground floor lobby areas are designed to allow for co-working spaces and include the provision of a separately allocated office for the Community Housing Provider (CHP) who will be managing the development for a minimum of 25 years.

Figure 1 below is a 3D montage of the proposed development as exhibited.



Figure 1: Artist's impression of the development as exhibited (courtesy: FUSE, 2026)

2 Analysis of submissions

This section provides a summary of the submissions received during the exhibition of SSD-99909708. The public exhibition occurred between 19 May 2026 until 1 June 2026 and was administered by DPHI in line with the requirements of the *Environmental Planning and Assessment Act, 1979* (EP&A Act).

In accordance with DPHI's *State Significant development guidelines – preparing a submissions report*, a Submissions Register is provided at **Appendix A** and outlines where each submission has been responded to within this report. Also, in accordance with Appendix D (preparing an Amendment Report) of the *State Significant development guidelines – preparing a submissions report* an Amended Project Summary is provided at **Section 3.2** which summarises the main changes and their impact to key planning controls and requirements.

2.1 Overview

During the public exhibition of the application, a total of eight (8) submissions were received including submissions made by government authorities and service providers and a member of the general public.

The exhibition of SSD-99909708 attracted the following submissions:

- Seven (7) submissions from government agencies and service authorities which provided commentary on the proposal; and
- One (1) submission was received from a member of the public in support of the development.

On 1 July 2026, DPHI issued a letter requesting further information on a number of key issues, and a response to issues raised in the submissions.

Table 1 below provides a breakdown of the submissions received as formally registered on the planning portal and whether the submissions are objecting, in support or just providing comments. In summary no submissions objected to the proposal but rather seek clarification requesting additional information and details in respect to the design intent.

Table 1: Numerical consideration of submissions

Submissions	Support	Oppose	Neutral/Comments
Government Agencies	0	0	5
Service Providers	0	0	2
Public Submissions	1	0	0
DPHI Key Issues Letter	0	0	1
Total	1	0	8

2.2 DPHI Key Issues Letter

The DPHI Key Issues Letter dated 1 July 2026, requested further information in regard to the following issues;

- Consideration being given to increase the proposed building separation distance between Building A and Building B at the southern junction or knuckle of the development as the separation distance does not satisfy the provision of the Apartment Design Guide (ADG) at this point.
- The location of the electrical substation along Buchan Avenue frontage should be reconsidered as it will impact the residential amenity of the adjacent units and visual presentation to the streetscape.
- Some basement car parking spaces are overlapping, and the architectural plans are inconsistent with the Design Report.
- Further justification is required in respect to the common circulation arrangement and more information on lift speeds is required as Building A relies on one lift which doesn't satisfy the provisions of the ADG in relation to building circulation.

Additional information and some amendments to the design have been incorporated to address these issues.

2.3 Government and Agency Submissions

A total of seven (7) submissions were received from government agencies and service authorities including the following:

- Rural Fire Service (RFS)
- NSW Department of Climate Change, Energy the Environment and Water, Water Group (DCCEEW) (Water Group)
- NSW Department of Climate Change, Energy the Environment and Water (DCCEEW), Conservation Programs, Heritage and Regulation Group (CPHR)
- NSW Department of Education (DoE)
- NSW State Emergency Services (SES)
- Endeavour Energy
- Ausgrid

The submissions prepared by the above agencies and service providers did not object to the proposal but rather made comments, requested additional information or required issues considered through the imposition of conditions or implementation of mitigation measures.

A detailed response to each agency submission is provided in **Section 4.2**.

2.4 Public Submissions

One (1) submission was received from a member of the general public in support of the proposed development as it will improve housing affordability however the submitter also strongly encourages additional height and scale across the site and would like units to be set aside for essential workers.

A more detailed response to this submission is provided at **Section 4**.

3 Description of Project Amendments

3.1 Design changes

Pursuant to section 37 of the *Environmental Planning and Assessment Regulation 2021*, an applicant may, at any time before a development application is determined, apply to the consent authority for an amendment to a development application.

In response to the exhibition period and with the project currently going through the detailed development and design phase, a number of design changes have been integrated into the development to improve its functionality and internal amenity. The proposed amendments to the development are considered to be minor and do not impact on the overall building envelope and built form outcome as originally applied for. The changes are described below in **Table 2**, detailed in **section 5** and illustrated in the Architectural Plans at **Appendix B**. Changes are circled and noted on the plans.

Table 2 Summary of Design Changes

Key Design Change	Description
Basement carpark reconfiguration	A number of changes have been integrated at this level to improve movement, circulation and access to spaces and bike parking areas. The changes improve the head height and clearance distances in the basement for accessible spaces. The following changes are proposed • Switch room relocated to provide a more consolidated bicycle parking area; • Increases in the length of the access ramp due to the lowering of the basement. • Reconfiguration of spaces to improve accessibility and remove any overlaps. No change is proposed to the overall parking, motor bike and bicycle parking numbers.
Lowering the basement level	The basement level has been lowered by approximately 350mm from a previous FFL of RL53.20 to RL52.850 which improves access to the accessible spaces by increasing head height and improving structural efficiency at this level.
Increasing ground floor level	The ground floor level has increased by 170mm to create a FFL of RL57.170. The increase is minor and only affects the central car parking area. There is no change to levels for both buildings at ground floor.
Expansion and waste consolidation	The fan room has been enlarged and converted to a secondary waste storage area providing dedicated waste storage for Building B. This is a significant improvement as future residents will not have to access Building A to dispose of waste as originally proposed. This secondary waste room will act as a holding bay but provide an improvement in the storage and waste arrangement. Access to the new waste room for residents in Building B is more direct and efficient. The waste room in Building A has been reduced and consolidated into one area inclusive of a separate room for retail waste.
Apartment redesign	The space dedicated to risers and the car park exhaust as part of the plant and services space is no longer required which has freed up space which has been integrated into apartments in Building B improving internal amenity.

Key Design Change	Description
	Building B - Ground floor apartments have been reconfigured and kitchen and WC layout and siting has been improved. Central units have been flipped with living spaces centralised. Upper levels - small study nooks have been introduced and balconies facing the area of common open space have been flipped with balconies being relocated and centralised. Building A - internal changes to ground floor apartments AG01 and AG02 to improve the layout of kitchens and amenities rationalising the space. Amendments to apartment designs are largely internal improving the functionality and utilisation of space.
Refinements to Lobby design	Lobby B redesigned as the Fire Control Room is not required and this space is opened up and more spacious. A new WC is included in the retail tenancy in Building A which includes a WC that can be utilised by the retail tenancy, CHP Office staff and residents who may be working in the workspaces in the lobby.
Central hot water system removed	The centralised hot water system has been removed from both buildings with individual hot water units to be installed in apartments. This reduces the overall height of both buildings by 500mm. Building A roof level to top of central hot water system was RL107.7, the highest point will now be RL107.2 (top of lift overrun). Building B roof level, top of central hot water system was RL88.5m the highest point will now be RL88 (top of lift overrun).
Introduction of angled privacy louvres	Along the southern side of Building B apartments 205, 305, 405, 505, 605, 705 and 805 the design of the privacy screens to the south facing balconies have been refined by including angled screens to face north and for external louvred privacy screens have been introduced to the lounge room window to minimise any potential impacts of overlooking through to units in Building A
Clothes lines	The plans introduce small clothes lines on balconies which have been requested by the Community Housing Provider. These is a small-scale addition.
Landscaping changes	There are a series of minor landscaping changes to rationalise landscaping outcomes across the site. This includes increased lower scaled buffer planting along the edges of the building. Planting around the substation to screen this element and improve the visual appearance of the street from the terraces. Changes to landscaping treatment along the entries to the buildings and along the laneway.

There is no change to the number of units, overall density and general building envelope and siting. The changes are considered to be minor, material in nature and aim to improve the functionality and internal amenity of spaces within the development. The project description will remain the same. The overall height is reduced by 500mm, and the Gross Floor Area (GFA) has increased marginally as plant and services which were previously excluded from GFA under the definition have been removed (risers and car park exhaust) and have been converted to habitable space. This has not affected the overall bulk and scale of the development as there is no change to the setbacks. The project summary and impact of the design changes is provided below in **Section 3.2**.

These changes are highlighted in the updated Architectural Plans provided at **Appendix B** and accompanying updated Design Report found at **Appendix D**. FUSE Architects have also considered the key issues raised by DPHI and they have addressed those issues through some design changes and an Architectural Response Letter which is located at **Appendix C**. Landscape plans and details have been updated and these can be found at **Appendix E** and **F**.

Section 6 of this report considers and assesses the proposed amendments and potential impacts.

3.2 Project Summary

Table 3 below summarises the project metrics and how these have been affected by the changes. In summary the changes are largely internal design changes which do not affect the building envelope, footprint and bulk and scale. The Gross Floor Area (GFA) has been slightly increased by 106.7sqm as areas in the building designated as services and plant which were previously excluded from GFA calculations are not required and have been absorbed into the apartments as habitable floor space and now are included in the GFA. The increase in the floor space is marginal and maintains the overall intent and compliance with the total GFA for Quadrant 2 retaining ample floor space to be utilised for future developments in the Quadrant. In addition, the services and plant were internal to the building therefore no additional bulk results from the changes and there is no physical change to the built from the changes.

In respect to height, the overall height has been reduced by 500mm for both buildings as the central hot water system has been removed which previously was located on the roof and was the highest point. The removal of this element reduces the overall height as can be seen in the elevations shown at **Figure 7** and **9**.

Table 3 Key Project Details

Planning provision	Submitted Project details	Proposed Amendments	Compliance
Project Summary	<i>Description as exhibited</i> Construction of three (3) interconnected building s including: • a 15-storey mixed use building comprising: - a ground floor retail tenancy - 123 affordable housing apartments • a nine-storey residential flat building comprising: - 45 affordable housing apartments • a two-storey residential flat building comprising four affordable housing apartments • a single level basement with 58 car parking spaces, 172 bicycle parking spaces and five motorcycle spaces • parking at ground level including five car parking spaces, one motorbike space and four bicycle spaces; • communal open space, a public open space through link, landscaping and public domain works; • excavation, earthworks and site preparation	No change to the exhibited description of works	N/A
Site Area	Future Lot 401 = 3,385sqm Future Lot 402 = 321sqm Total site area = 3,706sqm	No change *DA421/2025 which seeks approval to subdivide the site to formally create the development lots 401 and	N/A

		402 was approved by Liverpool City Council on 1 July 2026.	
Gross Floor Area	13,986sqm Max 50,898sqm for Quadrant 2 27.4% of the quadrant	14,092.7sqm Max 50,898sqm for Quadrant 2 27.6%	Yes, 106.7sqm of additional floor space
Height	Building A top of building = RL107.7 Building B top of building = RL88.5	Building A top of building = RL107.2 Building B top of building = RL88	Yes
Car Parking	63 car parking spaces provided	No change	Yes
Residential mix	1 Bedroom Units = 69 (40%) 2 Bedroom Units = 83 (48%) 3 Bedroom Units = 20 (12%) Total = 172 apartments 18 are adaptable units	No change	Yes
Minimum landscaped area	1,555sqm Approximately 45%	No change	Yes
Bicycle parking	173 spaces provided	No change	Yes
Motor bike parking	6 spaces	No change	Yes
Communal open space	998sqm Over 29%	No change	Yes
Deep soil zone	653sqm Over 19%	No change	Yes
Solar access	71%, 122 apartments	No change	Yes
Natural Ventilation	61% (72 units) up to 9 storeys 73% (128 units) for all storeys	No change	Yes
Setbacks	Generally, in accordance with Design Guidelines	No change	Partially compliant

4 Response to Submissions

Responses to each issue raised in the submissions are provided in this section of the report. Landcom request that DPHI consider the responses below, conclude their assessment and provide draft conditions for review.

4.1 Response to DPHI's Key Issues

On 1 July 2026 DPHI issued a letter requesting further assessment and consideration of a number of design features and issues. FUSE Architects have considered the issues and have addressed these in detail in the Architectural Response Letter attached at **Appendix C**, updated Architectural Plans at **Appendix B** and an updated Design Report which can be found at **Appendix D**. **Table 4** below provides a summary in response to the Key Issues raised by DPHI.

Table 4 Responses to DPHI

Issue Raised	Response
Building Separation	
Consideration being given to increase the proposed building separation distance between Building A and Building B at the southern junction and edge of the development boundary as the separation distances currently do not comply with the Apartment Design Guide (ADG).	The Design Team have reviewed the siting of the development especially the relationship of both buildings at the southern junction. Minimum separation distances between buildings is encouraged in accordance with Part 3F of the Apartment Design Guide (ADG). This section of the Guide aims to ensure the siting of the building/s maintain appropriate levels of visual privacy between properties. Design criteria require separation distances of a minimum of 12m between buildings up to 4 storeys and 18m (5-8 storeys). Building A and Building B at the closest point have a

Issue Raised

Response

total of 9.3m which fails to comply with the minimum separation distances.

The design has been refined to ensure windows openings and balconies are offset and an external angled louvred privacy screen is proposed to the lounge room window to the southern most units in Building B (205, 305, 405, 505, 605, 705 and 805) as shown in Figure 1 below. The balconies to these units already include privacy louvres which will restrict any overlooking. Figure 1 below shows the proposed design response to this issue.

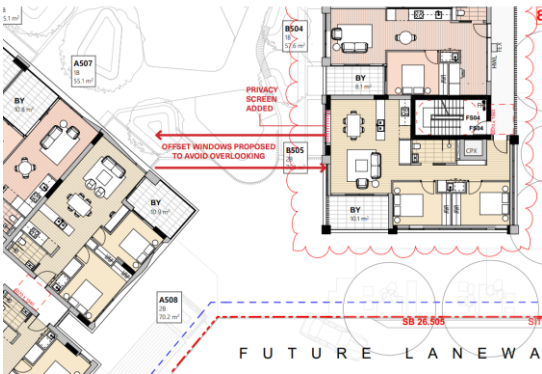


Figure 1: Proposed external louvres to windows to reduce potential for overlooking.

The proposed design of the buildings relies on less separation at the southern edge and junction however aims to be articulated and modulated and the building siting aims to ensure as many units as possible are orientated towards the north and north-east maximising solar access. Many design and built form concepts were considered for the design but given the awkward allotment layout the siting creates a more interesting design that considers the constraints and aligns with the fan shaped allotment shape. The proposed design satisfies the objective of part 3F-1 of the ADG which promotes “adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy”. The control is focused on maintaining privacy between sites not within sites however the issue is around ensuring ‘reasonable’ levels of privacy are maintained. The use of screening and offsetting windows and orientating openings to be directed sited away from adjoining buildings is promoted through the design and the response adequately addresses the control. It should be noted that it is only a small section of the development that is more closely located whilst the majority of the development is compliant with the ADG separation distances.

Electrical substation

The location of the electrical substation along Buchan Avenue frontage should be reconsidered as it will impact the residential amenity of the units and visual presentation of the development to the streetscape.

The Applicant explored a number of alternative locations and types of the electrical substations. Initially it was designed as a mini-chamber to be located centrally off the laneway. While this was a more desirable design solution it is cost prohibitive. The current location is the most feasible option as the existing Endeavour Energy (EE) HV network is located along Buchan Avenue which allows for easy connectivity and saves money on extending the existing network. In addition, EE standards require the substation to be located at the front boundary with 24/7 access from a public street. A proposed indoor substation location does not satisfy these provisions. There are also many logistical issues with a substation located centrally off the laneway, EE access arrangements are more complex as heavy vehicles need to be able to access the substation for repairs, maintenance and/or major equipment replacement etc. Locating the substation off the laneway will require appropriate easements to be created for access etc. An indoor chamber costs approximately \$350,000 when compared to \$200,000 for a padmount station. In this case, the current location is the most viable, economically feasible and convenient. A more detailed

Issue Raised	Response
	explanation of the benefits of the current location of the padmount station is provided in the design response, and an exploration of all the potential options is included in the report at Appendix C. To improve the visual presence of the substation it is being considered (and subject to EE approval) to include some indigenous and/or public art which is a common feature of many of these structures. This will improve the visual amenity and presentation of the structure and create a more sculptural element as opposed to a utility and infrastructure installation. Examples of substations incorporating public art are included in the report at Appendix C. The inclusion of some low scale landscaping and vegetation behind the structure will screen it and provide a green buffer between it and the adjoining apartments. This design solution is considered an acceptable and reasonable response that will not result in a poor urban design and streetscape outcome.
Basement car parking design	
Some basement car parking spaces are overlapping, and the architectural plans are inconsistent with the Design Report.	Basement Plan 01 shows car parking spaces No.38, 54 and 58 overlapping with adjoining spaces and walls. DPHI request that all parking spaces comply with the minimum dimensions and do not intersect with other components in the basement. The plans have been updated to ensure all car parking spaces comply with AS2890 and no longer intersect with other components (car parking spaces, columns or walls) in the basement.
Inconsistencies have been identified between the Design Report and Basement 01 Plan regarding the location of the switch room, bicycle parking and storage.	The Plans and Design Report have been reviewed and plans updated to ensure there is no inconsistency in the details provided. Refer to Appendix B and D . The switch room has been relocated towards the eastern side which has freed up the space along the western side creating a consolidated bicycle parking area.
Common circulation – Building A	
Further justification is required in respect to the common circulation arrangement and more information on lift speeds is required as 64 apartments in Building A share one lift which exceeds the design criteria of Objective 4F-1 of the ADG.	Additional lift traffic analysis (considering lift speeds and capacity) demonstrates that amenity is not compromised by the provision of the two lifts at the density proposed (1 lift for 64 apartments) for Building A. It is recognised that Building A does not comply with the ADG requirements which encourage 1 lift per 40 units. However, the proposed lift cores provide good amenity and can properly service the number of apartments. Technical Data presented at Appendix C to support and justify the design response considers the average waiting time of 45-60 seconds and the compliant handling capacity, move-in move-out management and in terms of system redundancy the lifts are considered to operate in a reasonable and efficient manner which aim to satisfy the objective of 4F-1 where “ <i>common circulation spaces achieve good amenity and properly service the number of apartments</i> ”.

4.2 Response to Government Agencies

This section responds to the submissions received by Government agencies and service providers.

4.2.1 Rural Fire Service (RFS)

NSW RFS reviewed the Environmental Impact Statement (EIS) and associated technical reports. This agency raised no objection to the proposed development subject to satisfying the recommendations of the Bushfire Protection Assessment which supports the application. The response to this submission is summarised at **Table 5** below.

Table 5 Response to RFS

Issue Raised	Response
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A review of the bush fire prone land (BFPL) map shows that the subject site is not mapped	Noted
The vegetation within the Maxwell Creek is under a Vegetation Management Plan (VMP) which will retain, protect and enhance the Cumberland Plain Woodland vegetation community and all the development adjoining Maxwell Creek has considered the vegetation as woodland for the purpose of this assessment.	Noted
RFS reviewed the Bushfire Protection Assessment report prepared by Travers Bushfire and Ecology which demonstrates that the proposal satisfies the performance criteria outlined in <i>Planning for Bush Fire Protection (PBP) 2019</i> .	The proposal will be conditioned to comply with the recommendations of the Bushfire Assessment Report prepared by Travers Bushfire and Ecology dated 16 April 2026. The Bushfire assessment makes seven (7) recommendations including future dwellings to be constructed to achieve BAL-12.5, conduct a review of the hydrant placement ensure above ground pipes and services are to be constructed of fire-resistant materials, prepare a ground maintenance plan, electrical reticulation and reticulated water implemented in accordance with the PBP, restriction on title to prevent gas connections to dwellings, include fire suppression systems, prepare a Bushfire Emergency Management and Evacuation Plan (BEEP) and a 'no parking' sign to be included along the rear lane to allow for service and emergency vehicles to access the site.

4.2.2 Department of Climate Change, Energy, the Environment and Water (DCCEEW) - Water Group

DCCEEW (Water Group) reviewed the Environmental Impact Statement (EIS) and associated technical reports. This agency raised no objection to the proposed development subject to additional information in respect to the basement parking levels and any potential affectation to ground water and the need for a water licence if ground water is triggered by the excavation. The response to this submission is summarised at **Table 6** below.

Table 6 Response to the Water Group in DCCEEW

Issue Raised	Response
Water supply, take and licensing <u>Recommendation – pre-determination</u> The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to quantify the maximum annual volume of water take due to aquifer interference activities and demonstrate the ability to acquire sufficient water entitlement unless exemption applies. <u>Explanation</u> Insufficient information has been provided to confirm the potential groundwater inflow volumes. DCCEEW Water notes that the groundwater table will potentially be intercepted. Maximum excavation depths for this project will be at approximately 3.5m below ground level, however the design has not yet been finalised. Groundwater was encountered in boreholes at depths of approximately 4-5m. As the excavation depth has not been finalised, it cannot be determined if groundwater will be intercepted. The proponent has not presented sufficient information and analysis on inflows during the construction and ongoing operation of the site. Quantification of maximum potential in flow volumes is required.	The original Geotechnical report that accompanies the EIS was prepared by Geotechnique, dated 27 February 2026. This report has been updated to reflect the more detailed design and change in levels and can be found at Appendix I. The report confirms that the proposed development will comprise of a 'drained' basement design most likely utilising the sump and pump method of construction. Generally, any building utilising an ongoing pumping out system (sump and pump) is considered an "aquifer interference activity" under the Water Management Act 2000 hence the DCCEEW submission and request for further information in respect to water uptake. In the case of the proposed development, the lowest point of the development will be located above the water table (even when considering fluctuations in ground water levels). In general, a drained basement construction design relies on an open drain that could potentially intercept ground water or is affected by stormwater infiltration and/or extreme water level rises that could be considered as an 'uptake of ground water. Despite the method of construction, the Geotechnical investigations maintained that there will be no aquifer or ground water interference based on the plans and proposed building levels. The Design Team have been detailing the design which includes lowering the basement level by a further 350mm in order to provide ample head height for the accessible spaces and to satisfy structural engineering requirements. This change will amend the basement level to RL53.12 (FFL) and the bottom of

Issue Raised	Response
<u>Recommendation – pre-determination</u> If water take is required, DPHI should request the proponent to identify the water supply work and provide an impact assessment of the work to enable it to be exempt from approval under Section 4.41 of the EP&A Act. If this information is not provided, the proponent must obtain a water supply work approval under the Water Management Act 2000 prior to any water take occurring. <u>Explanation</u> The proponent has identified a conventional sump and pump as the method to manage groundwater inflows, however an impact assessment of this work has not been provided. For water supply works to be assessed as part of the SSD under Section 4.41 of the EP&A Act, the works must be clearly identified and supported by an adequate impact assessment. If this information is not provided, a separate water supply work approval under the Water Management Act 2000 would be required.	the excavated level (BEL) will be RL52.82. The OSD tank will be located at RL52.05. The bottom of the lift shaft is proposed to be tanked. An updated statement titled Addendum Geotechnical Investigation Report dated 5 August 2026 can be found at Appendix H and confirms that the maximum expected water inflow into the sump system will be below the 3ML per annum based on the most updated levels and it is very unlikely the development will affect ground water. The updated geotechnical information (Addendum Geotechnical Investigation report at Appendix H) confirms that there will be no water uptake, the development will not affect ground water and a water licence in this case is not required. The original geotechnical report and associated investigations included the drilling of three (3) boreholes across the site. Groundwater monitoring wells were installed within the boreholes. The testing found that <i>“groundwater or seepage was not observed in the boreholes during auger drilling to depths of 4.16m to 5.7m below ground level and a standing ground water level was recorded between depths of 3.92m to 5.06m BGL”</i>. Given these findings groundwater was found as low as RL49.8 – 49.9 with the bulk excavation level at RL52.82 and the OSD Tank to be located at RL52.02 which is still 2.15m to 2.92m above the highest recorded groundwater level. The report goes on to state that <i>“...groundwater level fluctuations at the site are not anticipated to exceed approximately 0.5m based on the geological conditions encountered. As such, groundwater levels are unlikely to rise to a level that would impact the proposed basement, nor is the development expected to significantly influence the groundwater at the site”</i>. The updated Geotechnical report (at Appendix I) confirms these findings and goes on to say <i>“The recorded groundwater levels indicate that groundwater occurs within the shale bedrock and at the base of the residual soils, ranging between RL49.8m – RL49.9m AHD during the monitoring period...the materials to be excavated are anticipated to comprise fill and residual soils. However, shale/siltstone bedrock may be encountered locally due to natural variations in subsurface conditions.”</i> The basement is proposed to be drained, and the lift shaft will be tanked as this is the lowest point of the development. A sump and pump method of drainage which is a basin dug into the lowest part of the floor that collects any channelled water and mechanically pumps it outside and away from the foundations is a standard construction process and considering the updated Geotechnical report confirms it is unlikely the development will reach ground water this method is appropriate and satisfactory without the need for a water access licence (WAL). This is confirmed in the technical assessment (Appendix I) in the updated Geotechnical report which states that <i>“the ground water level is expected to remain below the anticipated basement excavation level and as such significant groundwater inflows into the excavation are not anticipated. Any seepage into the excavation should be relatively minor and is expected to be controllable by periodic pumping from sumps in the excavation”</i>. The sump and pump method is an integral contingency for localised surface/stormwater management and minor perched water seepage, not intended for regional groundwater extraction.
<u>Recommendation – post approval</u> DPHI should request the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2025. <u>Explanation</u> Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the Water Management	While the updated Geotechnical information confirms that the development will not affect ground water, and a water licence is not required for this project at both construction and operation stages. The approval can be conditioned to ensure an exemption will need to be applied for prior to works commencing. Noted – ground water is not anticipated to be intercepted.

Issue Raised	Response
(General) Regulation 2025 applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 6 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 19, sch 4 of WM Reg). To claim either of these exemptions requirements must be met, such as; - the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and - the records are kept for 5 years.	A condition can be included to ensure the Applicant applies for an exemption in accordance with the Water Supply Work Approval and a licence will not be required in this case.
Groundwater impacts and dewatering requirements	
<u>Recommendation – pre- determination</u> If the take of groundwater is greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). <u>Explanation</u> As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.	The Addendum Geotechnical Investigation report at Appendix H confirms that the uptake of groundwater will be less than 3ML per annum and that there will be no aquifer interference. Given this estimation and the ground conditions and investigations, an exemption will be applied for. The updated Geotechnical report at Appendix I makes the following recommendation in respect to groundwater; <i>“Under normal conditions, the groundwater level is anticipated to be deeper than the proposed basement level (>2.1m). Therefore, groundwater is unlikely to impact the proposed development, and vice versa.....However under adverse weather conditions, infiltrated surface water may seep behind the basement walls. To prevent the build up of hydrostatic pressure and minimise impacts on structural performance perimeter drainage should be provided behind the basement walls to collect and safely dispose of seepage water in accordance with the recommendations provided in this report”.</i> The Geotechnical advice that supports and informs this submission should provide enough evidence to suggest a water licence is not required in this case.

4.2.3 Department of Climate Change, Energy, the Environment and Water (DCCEEW) - Conservation Programs Heritage and Regulation group (CPHR)

A submission from the Conservation Programs, Heritage and Regulation Group (CPHR) of DCCEEW dated 25 May 2026 was received. The submission did not object to the proposal however highlighted that the Order to confer biodiversity certification on the former *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (currently *State Environmental Planning Policy (Precincts - Western Parkland City) 2021*) which includes the Edmondson Park precinct and the site is due to expire on 30 June 2026.

The response to this submission is summarised at **Table 7** below.

Table 7 Response to Conservation Programs, Heritage and Regulation Group in DCCEEW,

Issue Raised	Response
Biodiversity Certification	
The biodiversity certification on the former <i>State Environmental Planning Policy (Sydney Region Growth Centres) 2006</i> (currently <i>State Environmental Planning Policy (Precincts - Western Parkland City) 2021</i>) is due to expire on 30 June 2026 and if not renewed by the end of June, biodiversity across the site will need to be reconsidered and assessed against the provisions of the Biodiversity Conservation Act.	The Order was originally issued on 11 December 2007 and was to expire on 30 June 2025. On 6 June 2025 the Minister for the Environment extended the expiry date for one year until 30 June 2026. On 18 May 2026 the Urban Development Institute of Australia (UDIA) made a submission to the Minister for the Environment seeking an extension of the Sydney Region Growth Centres Biodiversity Certification Order (“the Order”) with a 9-year extension proposed.
This means a reassessment of biodiversity values across the site either by way of preparing a Biodiversity Development Assessment Report (BDAR) or request a BDAR waiver would	On 24 June 2026, the NSW Environment Minister signed an order extending the biodiversity certification for the Sydney Region Growth Centres (north-west and south-west) for a further 9 years until 30 June 2035. The site which sits within the Edmondson park precinct is located within the south-west growth centre. Given the

need to occur as the site is no longer protected by way of the Order.	Biodiversity Order has been extended the submission has been adequately addressed and the site remains protected under the provisions of the order.
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4.2.4 NSW Department of Education (DoE)

The Department of Education (DoE) reviewed the EIS and exhibited material and lodged a submission on the portal dated 1 June 2026 which does not object to the proposal but requests that a Construction Management Plan be prepared prior to construction commencing and construction traffic movement and associated activity be carefully managed to minimise impacts on the local school located within the vicinity of the site.

The response to this submission is summarised at **Table 8** below.

Table 8 Response to Department of Education (DoE)

Issue Raised	Response
Traffic Impacts and conflicts	
In respect to construction traffic, DoE request the following; - DoE recommend the proposal be conditioned to prohibit construction vehicles accessing and egressing the site during school drop-off and pick-up times (30 minutes before and after school start and finish times). - Pedestrian and cyclist safety should be closely considered and managed including where necessary, with traffic controllers employed to ensure safe construction vehicle entry and exit movements. - If any impacts to school bus services are anticipated, these should be addressed and mitigated through the CMP.	There are a few schools within the immediate vicinity of the site including Edmondson Park Public School and the Edmondson Park Preschool as well as St Francis Catholic School. The submission by DoE aims to protect the amenity of the schools during construction and that the operation and daily activities of these educational establishments are not compromised. DPHI have a series of standard conditions in relation to the provision and preparation of management plans prior to the commencement of works which should satisfy and address the DoE comments. Given the comments by DoE, it is suggested the following conditions be imposed that will satisfy the request with additional subsections in bold to be included which aim to address DoE requirements; Construction Environmental Management Plan <i>Prior to the commencement of any work, the Applicant must prepare and submit to the Certifier a Construction Environmental Management Plan (CEMP) for the development with measures to reduce environmental impacts and harm during construction of the development, including, at a minimum, the following information:</i> <i>details of:</i> <i>hours of construction;</i> <i>24 hour contact details of the site manager and complaint handling procedure;</i> <i>construction program and construction methodology, including construction staging;</i> <i>traffic management;</i> <i>noise and vibration management;</i> <i>management of dust and odour;</i> <i>stormwater control and discharge, including ensuring that vehicles leaving the site do not transfer dirt to roadways;</i> <i>remediation and management of contamination;</i> <i>management of stockpiles of soil or other materials;</i> <i>waste management;</i> <i>external lighting in compliance with applicable Australian Standards; and</i> <i>site security, including fencing or hoarding.</i> <i>Traffic and truck movements being scheduled and operated in such a way that deliveries and access to the site does not adversely impact or compromise school bus routes, movements and services in any way.</i>

Issue Raised	Response
	b. Construction Traffic and Pedestrian Management Sub-Plan in accordance with Condition C2; c. Construction Noise and Vibration Management Sub-Plan in accordance with Condition C3; d. Air Quality Management Sub-Plan in accordance with Condition C4; e. Construction Waste Management Sub-Plan in accordance with Condition C5; f. Construction Soil and Water Management Sub-Plan in accordance with Condition C6; g. an unexpected finds protocol for remediation in accordance with Condition C16; h. an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure, including but not limited to ensuring compliance with Condition ; i. waste classification (for materials to be removed) and validation (for materials to remain) to be undertaken to confirm the contamination status of relevant areas of the site.

Construction traffic and pedestrian Management Sub- Plan

2. Prior to the commencement of any work, the Applicant must submit to the Certifier a final Construction Traffic and Pedestrian Management Sub-Plan (CTPMP) for the development with measures to reduce environmental impacts and harm during construction of the development arising from construction traffic, including, at a minimum, the following information:
 - a. location of proposed work zone(s);
 - b. **the proposed work zones shall be designed and located so as not to conflict or compromise pedestrian, cyclist and vehicular access to the school and associated drop-off and pick-up spaces with details of location and their operation to be provided as part of this plan;**
 - c. **traffic controllers shall be employed to ensure construction activities do not adversely affect pedestrian and vehicular behaviour in the vicinity of the site;**
 - d. **Traffic controllers shall be employed to manage construction vehicles into and out of the site and ensure there is safe movement and access to and from the site;**
 - e. **The Plan should ensure that there are no impacts on school bus services and consider general bus movements and how the works will not affect and impact bus movements;**
 - f. **Construction vehicles are not permitted to enter or exit the site between 8.30am to 9am and 3pm – 3.30pm during weekdays so as not to affect or conflict with the Edmondson High School drop off and pick up times.**
 - b. construction vehicle access arrangements and haulage routes;
 - c. predicted number and timing of construction vehicle movements and vehicle types;
 - d. identification of potential conflicts between vehicle movements required for construction and general traffic, cyclists, pedestrians, bus services within the vicinity of the site from construction vehicles.
 - e. Any conflicts or potential conflicts with school activities shall be appropriately mitigated.

The standard construction hours condition can also be modified to ensure construction vehicles are restricted in accessing the site between 8.30am to 9am and 3pm to 3.30pm.

Work zones

Issue Raised	Response
Work zones should not be proposed in locations that will compromise pedestrian, cyclist and vehicular access to the school and associated drop-off and pick-up spaces.	The standard condition in relation to the preparation of Construction traffic and pedestrian Management Sub-Plan can include a section in relation to the location and operation of the proposed work zone to be designed and operated in such a way that it will not interfere with school activities.

4.2.5 NSW State Emergency Services (SES)

On 17 June 2026, the NSW State Emergency Service (SES) lodged a submission in response to the exhibition of the EIS. SES made several comments in regard to flooding and encourages the design to minimise the risk of flooding. **Table 9** summarises the comments raised and provides a detailed response.

Table 9 Response to SES comments

Issue	Response
Flooding	
SES recommend pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.	The SES comments are noted, and no further action or reporting is required as standard stormwater design in this case will not adversely affect flood behaviour in the immediate area and at the site.
Highlight the opportunity to address flooding constraints through a precinct-wide strategic approach, by considering the most appropriate uses for flood affected areas to mitigate risk to life and property, that will result in a more resilient community, able to adapt to climate change impacts into the future. The submission refers to the key principles outlined in the 'Support for Emergency Management Planning Guideline' at Attachment A.	The EIS is accompanied by a Flood Assessment Report prepared by GRC Hydro dated 15 April 2026. The report notes that <i>"the site is not flood prone and lies outside the Probable Maximum Flood (PMF) extent. The proposed lobby level of RL54.3 is situated well above the adjacent PMF level, and therefore a detailed Flood Impact and Risk Assessment is not required. As the site is not flood-affected no flood risk management measures are required"</i> The assessment also considered the impact of overland flows with a rainfall-on-grid model being developed to assess existing overland flow behaviour within the Maxwell Creek catchment and the small upstream catchment contributing to the site. The assessment found that <i>"the modelling indicates that overland flow generated from the upstream 2.3ha catchment is minor.....Flows of this magnitude are typically managed through standard stormwater drainage design and do not present a significant overland flooding constraint to the proposed development. The contributing catchment will not increase under the proposed layout and no adverse change in overland flow magnitudes or behaviour is expected"</i> . Given the technical flooding assessment and advice, the comments received by SES have been considered and are noted but no further action is required as the site is not flood prone and no flood risk management measures are required. Standard stormwater design is satisfactory given the design will not present any design-critical flooding constraint and there will be no impact to the existing flood behaviour in the area.

4.3 Response to Service Providers

4.3.1 Endeavour Energy

A formal written response to the EIS was provided by Endeavour Energy (EE). The service provider did not object to the redevelopment with the decision to "approve with conditions". The proposal can be conditioned appropriately to satisfy this authority at the detailed design stage and obtain specific authority approvals that will be required for connectivity to existing services prior to commencement of construction. The submission included a series of conditions that will need to be satisfied and included as part of the consent. **Table 10** below summarises the comments provided by EE.

Table 10 Response to Endeavour Energy (EE)

Issue Raised	Response
Agency response	

Issue Raised	Response
The decision on the outcome of the assessment essentially correspond to the NSW Planning Portal 'Agency response', but as Endeavour Energy is not a concurring authority under the provision of the Environmental Planning and Assessment Act 1979 (NSW), it does not 'Approve' or 'Refuse' a Development Application in the Portal ie. under the provisions of State Environmental Planning Policy (Transport and Infrastructure) 2021 (NSW), Councils must take into consideration any response. If any matter in the submission is marked as 'Objection', the outcome of the assessment will be 'Object' but in the NSW Planning Portal the 'Agency response' will be 'Approve (with conditions)'. If any matter is marked as 'Condition', the outcome of the assessment and the 'Agency response' in the Portal will both be 'Approve (with conditions)'. If all the matters in the submission are marked for 'Advice', the outcome of the assessment and the 'Agency response' in the Portal will both be 'Advice'.	Noted
Standard conditions	
The following conditions are imposed by EE: • Dial Before You Dig - Before commencing any underground activity the applicant must obtain advice from the Dial Before You Dig service • Network Asset Design - Design electricity infrastructure for safety and environmental compliance consistent with safe design lifecycle principles • Network connection - Applicants will need to submit an approximate application based on the maximum demand for electricity for connection of load. • Service conductors - Low voltage service conductors and customer connection points must comply with the current 'Service Installation Rules of NSW' • Vegetation Management - Landscaping that interferes with electricity infrastructure is a potential safety risk and may result in the interruption of supply.	Noted – these conditions will be satisfied prior to issuing of a Crown works Certificate and/or commencement of construction.
Accredited Service Provider (ASP)	
Endeavour Energy is urging applicants / customers to engage with an ASP prior to finalising plans to assess and incorporate any required electricity infrastructure as well as addressing safety issues such as safety clearances. In so doing the consideration can also be given to its impact on the other aspects of the proposed development. This can assist in avoiding the making of amendments to the plan or possibly the need to later seek modification of an approved development application.	Noted – As outlined above, the Applicant (Landcom) will engage a Level 3 ASP to assist with planning of the electricity connections and obtain all relevant authority approvals at the detailed design stage prior to commencement of construction.
Duty of care	
All individuals have a duty of care they must observe when working in the vicinity of electricity infrastructure. Before you do anything: 1) Contact Before You Dig and Look Up and Live to obtain the details of the electricity infrastructure on or near the site noting they are a guide only to what might be in the area and may not be entirely accurate. 2) Comply with the conditions and consider the advice provided above. 3) If needed contact Endeavour Energy General Enquiries on 133 718 or the contacts provided above for assistance. For Emergency Assistance call 131 003. 4) DO NOT attempt any work near electricity infrastructure until all required approvals and safety measures are in place. 5) Proceed only if you have satisfied yourself, it is safe. 6) Always remember, even the briefest contact with electricity at any voltage can have serious consequences to a person's health and safety and can be fatal.	Noted – can be included as standard and/or advisory conditions.
General comments	
The submission includes a series of standard conditions that the Applicant will need to consider in the detailed design and ensure	Noted – all issues outlined in the submission can be addressed via standard conditions as noted above.

Issue Raised	Response
formal approvals for connections are obtained prior to construction commencing.	
Standard conditions as part of the submission include how to connect to existing services and how proposed padmount substations will need to be designed and located including the provision of low scale vegetation and landscaping around the perimeter of the substation and no trees.	Noted – addressed through the detailed design.
The applicant will need to engage a Level 3 Accredited Service Provider (ASP) to make sure the design of the substation complies with Endeavour Energy's standards and the suitability of access, safety clearances, fire ratings, flooding etc is taken into consideration.	Noted – Landcom will engage a Level 3 ASP to assist with the Crown works Certificate stage and during construction.
EE considered the location of the proposed substation along the Buchan Avenue Road frontage, and the building appears to encroach the restriction for fire rating required for padmount substations which must meet the appropriate fire rating or be protected by a fire screen wall.	Noted – consideration will be given to the design as part of the authority approval.

4.3.2 Ausgrid

Ausgrid provided a submission after reviewing the EIS and this is summarised in **Table 11** below.

Table 11 Response to Ausgrid

Issue	Response
Service provider	
Ausgrid appreciates being an opportunity to review the EIS	Noted
Ausgrid notes that the proposed development does not sit within Ausgrid's boundary. The appropriate utility provider is Endeavour Energy and referral to this authority is required.	Endeavour Energy (EE) were consulted, and a submission has been received from this authority which is considered at section 4.3.1 above.

4.4 Response to public submissions

One (1) submission from a member of the general public was received in support of the development. The points raised in the submission are summarised in **Table 12** below.

Table 12 Response to Public submission

Issue	Response
Housing Affordability	
The proposal will significantly improve housing affordability	Noted and agreed
Increase the number of units and storeys and dedicate units for essential workers	While it is appreciated that there is a need for more affordable and diverse housing and the Edmondson Park precinct could possibly cater for more density and scale, the proposed development has been designed to satisfy the Concept Plan approval which establishes an anticipated built form and masterplan outcome for the site and immediate precinct. The development satisfies the desired future development outcome for the site and immediate area. Essential workers will be able to apply for affordable housing if their income falls within the definition of "affordable housing" in accordance with Chapter 2, Part 1, section 13 of the Housing SEPP.

5 Assessment of Design Amendments

5.1 Strategic and Statutory Planning Context

Since SSDA lodgement, there have been no changes to the statutory and strategic context that would affect the site or the proposed development.

The project's key statutory assessment is outlined in the EIS and remains largely unchanged. The Project Summary at **Section 3.2** considers the key planning controls and whether the amendments alter these. They remain largely unchanged and largely aligned with the EIS assessment.

5.2 Built Form

Section 3 outlines the architectural design changes that have been made to the proposed development, including the reasons for these changes. Updated Architectural Plans have been prepared by FUSE Architects and are provided at **Appendix B**. An Architectural response letter has also been prepared at **Appendix C**, and an updated Architectural Design Statement accompanies this submission (refer to **Appendix D**).

The proposed design amendments are minor refinements to the built form that was previously assessed and found generally acceptable within the publicly exhibited EIS. Where changes to the built form are proposed, these do not alter the previous assessment as the changes are considered to be minor and material in nature.

5.2.1 Apartment Design changes

Development of the detailed design has focused on the location of essential services. In developing the scheme, the number of risers is not required and the area designated for the car park exhaust is no longer needed so the removal of these elements has freed up space within apartments in Building B and their internal amenity and functionality has been improved.

The main refinements are internal changes to kitchens, WC and living spaces making the internal amenity more functional and spacious. At Level 1 the main physical change is that the central apartments have their balconies and living spaces flipped as this creates a more standardised design and will be easier to construct. The size of units remains largely the same with slight increases in depth due to some service areas being dedicated as habitable space.

Figures 2 and **3** below compare the original scheme with the amended one at Level 01 Building B.

Changes at levels 2 and 3-8, Building B are similar to Level 01. **Figures 4** and **5** show the layouts and compare these to the original design. At Level 2 apartments have been flipped with balconies relocated which aims to improve internal circulation and the amenity of key spaces. At level 2 to level 8 centrally located apartments have been able to integrate a small study adjacent to the entry. This small study space is a very efficient inclusion and will add value to the units in terms of improving their functionality.



Figure 2: Level 01 Building B floor plans (As Exhibited)

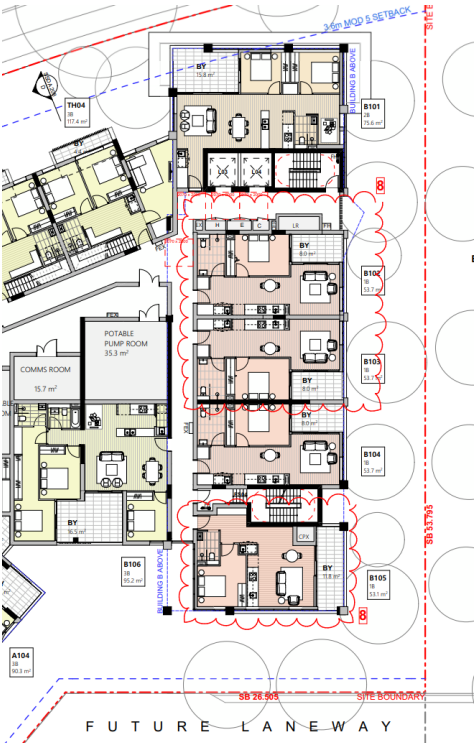


Figure 3: Level 01 Building B floor plans (As Amended)



Figure 4: Levels 3-8 Building B typical floor plan (As Exhibited)

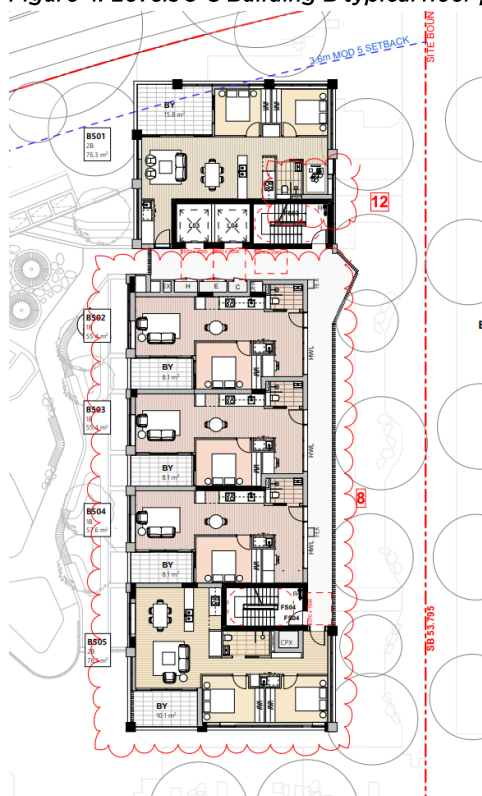


Figure 5: Levels 3-8 Building B typical floor plan (As Amended)

The changes do not alter the depth of the building, nor do they significantly affect the key metrics of the scheme. The increase in the floor space by 106.7sqm is considered minor and doesn't affect the bulk or scale of the building as the space was previously services and plant which were excluded from the GFA calculation and its conversion to habitable floor space means the area is now included in GFA. It's a minor addition and will not facilitate any significant change to the built form.

5.2.2 Façade and elevations

The internal changes to the apartments in Building B and the relocation of balconies will have a slight impact to the external façade of the building as the balcony openings have been relocated. **Figures 6 – 9** compare the elevations as originally proposed and as amended. The building maintains the strong articulation through the use of openings, materiality and finishes and retains symmetry and balance.

There are a few minor changes to the materiality of the façades, and these have been implemented as construction costs are increasing and more affordable materials are being considered.

Figures 6-9 also show the reduction in the overall height by the removal of the central hot water system from the roof which will reduce the overall height of both Building A and B by 500mm.

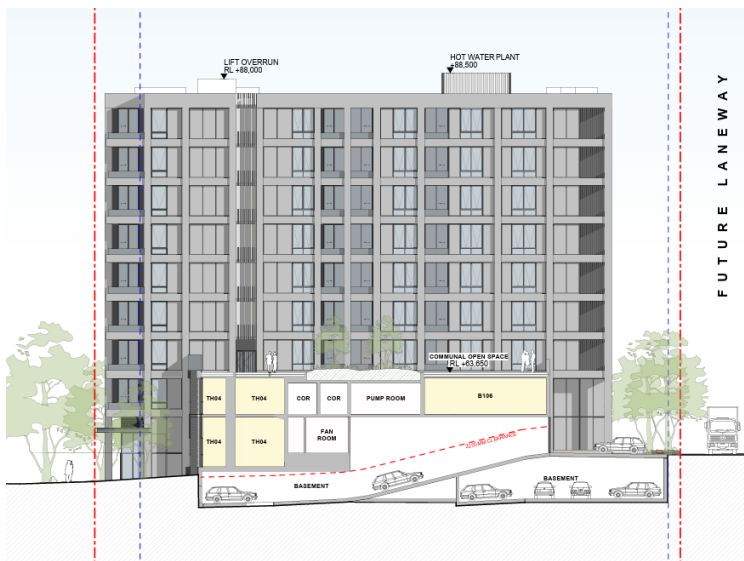


Figure 6: Building B internal elevation (As Exhibited)



Figure 7: Levels 3-8 Building B typical floor plan (As Amended)

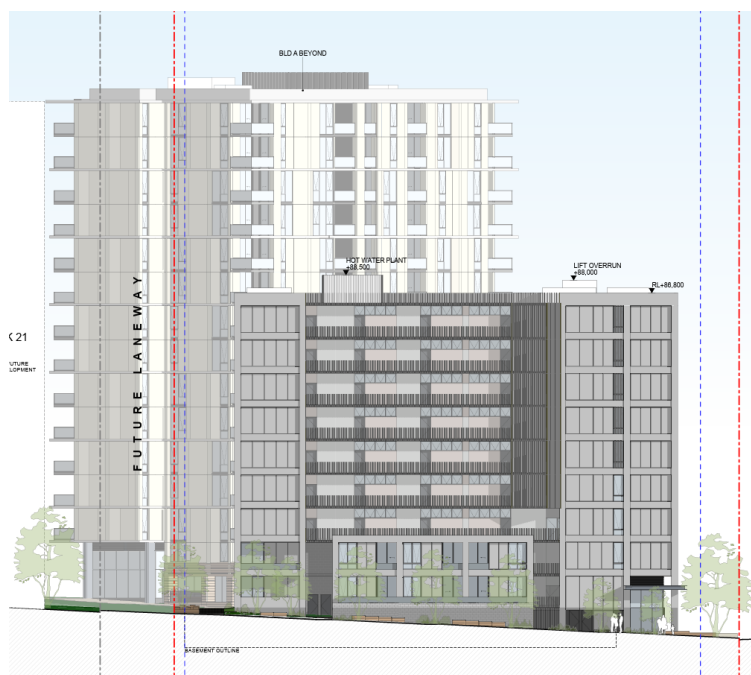


Figure 8: Eastern elevation Building B (As Exhibited)

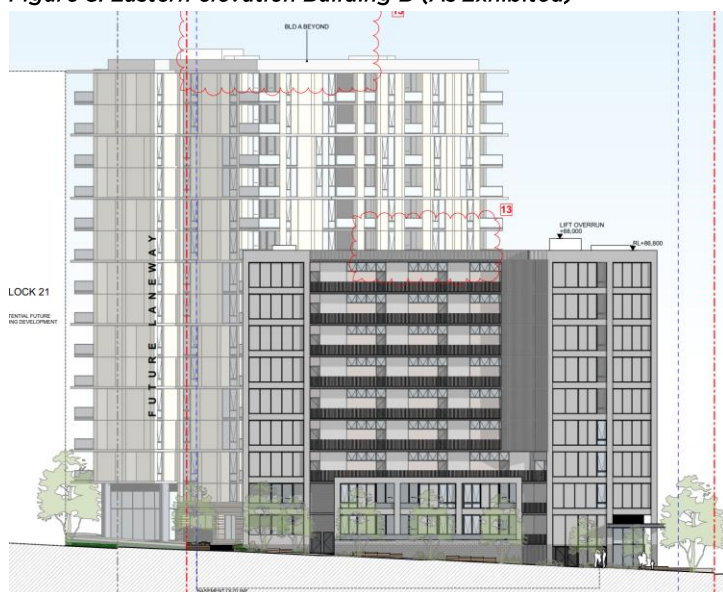


Figure 9: Levels 3-8 Building B typical floor plan (As Amended)

5.2.3 Waste management

As mentioned above in section 6 the waste room has been amended and the fan room on the ground floor removed and replaced with a dedicated waste room for Building B. This significantly improves the waste management and arrangement as residents will not have to access Building A's waste room. The waste room in Building B has been simplified and consolidated and will be used as an interim, secondary measure (holding bay) where the waste will still need to be consolidated through to the main area in Building A. The proposed arrangement has been assessed by MRA Consultants who prepared the Waste Management Plan. A revised waste management strategy has been prepared by MRA Consultants and can be found at **Appendix G**.

In conclusion MRA believe the amended arrangement is an efficient solution that improves resident accessibility while maintaining adequate waste storage capacity.

It is recommended that a condition be imposed that requires the Waste Management Plan to be formally updated to cater for the changes prior to the issuing of the Crown works Certificate.

5.2.4 Landscaping

The changes to the development at the ground floor have resulted in a few minor changes to the landscape design which include the following changes;

- Minor layout changes to the area of communal open space including retaining wall realignments, seat relocation and associated paving extension. These aim to create a better pedestrian environment and improve accessibility and safety when utilising the BBQ and associated seating area.
- Additional low scale planting around the perimeter of the communal area.
- Landscape design levels and layout are updated near building entries and an accessible entry ramp and stair provided to accommodate slight level changes. Additional low scale landscaping is provided along the laneway and rear of the building and along key edges.
- While there are no real changes to the type of landscape species and arrangement and layout of landscaping elements, there is increased landscape treatment around the periphery of the buildings and around the electrical substation to provide low scale greenery, buffer planting and screening to soften the appearance of the substation structure when viewed from the adjacent units.
- While some trees have been removed, they have been replaced/relocated in other parts of the development, and the overall tree canopy has increased.

Figure 10 below is an extract comparing the changes at the ground floor level. A full set of updated landscape plans can be found at **Appendix E** and an explanation of the design variations are provided at **Appendix F**.

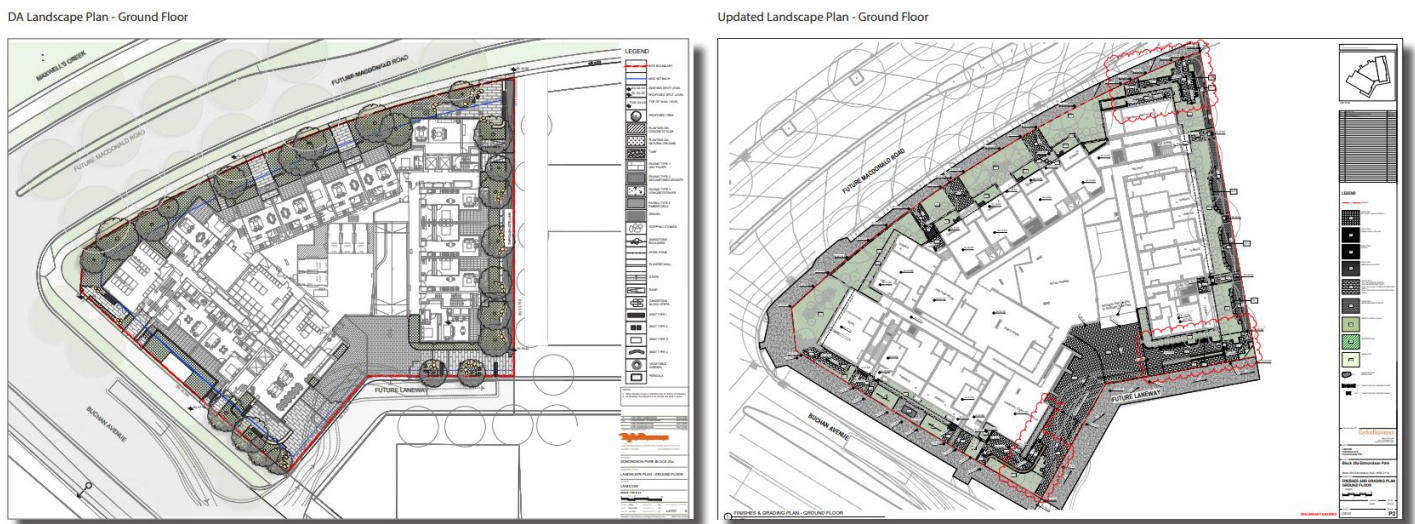


Figure 10: Comparison of the Ground floor landscape changes (courtesy: Taylor Brammer)

6 Updated Project Justification

The proposed changes are small scale and do not alter the project justification as outlined in the EIS however given the amendments are positive contributions to the developments functionality and amenity the justification is strengthened by the changes that provide meaningful amendments to the proposal.

6.1 Ecologically Sustainable Development

Part 8 of the EP&A Regulation lists four (4) principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle.
- Intergenerational equity.
- Conservation and biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

These are discussed in greater detail below.

6.1.1 Precautionary Principle

The precautionary principle requires precautionary measures to be taken only where there is a threat of serious or irreversible environmental damage. The principle permits the taking of preventative measures without waiting to ascertain the reality or seriousness of environmental threats ie no scientific evidence has been produced.

The RtS and Amendment Report has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to this project.

6.1.2 Intergenerational equity

Intergenerational equity relates to ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The project has been designed to benefit both existing and future generations by;

- Ensuring the health, diversity, productivity of the environment are maintained through the implementation of passive and active design measures that reduce operational energy and water use.
- Reducing reliance on energy, water and waste to ensure that the health, diversity and productivity of the environment is maintained for the benefit of future generations;
- Implementing safeguards and management measures to protect and enhance environmental values;
- Facilitating job creation in close proximity to homes and public transport.

6.1.3 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 proposal will not have a significant effect on the biological diversity and ecological integrity of the study area. As demonstrated in the EIS and within this report, the proposed development (as amended) will not result in any significant effect on the biological and ecological integrity of the study area, subject to the mitigation measures in the EIS.

6.1.4 Improved Valuation, Pricing and Incentive Mechanisms

The principle 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. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

This principle has been considered in the assessment of the development and reuse and recycling of any resources has been considered and will be initiated through standard construction measures and waste management practices.

6.2 Likely Impacts of the Development

Having regard to the natural environment, built environment, economic and social impacts of the proposed development, the likely impacts of the development (as amended) are considered acceptable as outlined in the following sections.

6.2.1 Natural and Built Environment

The changes do not alter the findings of the EIS which assessed the potential impacts of the proposed development and demonstrates it will not result in any unacceptable environmental impacts. All potential impacts that have been identified can be mitigated where reasonably feasible and possible.

In summary, the proposed development:

- Has been carefully designed with consideration of site constraints and attributes, the streetscape character and future development proposed in the Station precinct. It will not result in any unacceptable impacts to surrounding properties or the public domain.

- Achieves a high-quality design outcome that will deliver an excellent level of internal amenity for future residents by optimising solar access, cross ventilation and providing privacy for all residents.
- Is situated on bio-certified land, with no further impacts to biodiversity that require assessment as part of the EIS.
- Will not result in any unacceptable traffic or transport impacts. Despite a shortfall in parking, the proposal provides adequate parking arrangements through a combination of private parking in the basement dedicated to the larger residential dwellings and provision of car share spaces. Given the proximity to public transport the provision of less private parking spaces is justified.
- Is a transit orientated development where the use of alternative modes of transport is encouraged.
- Is unlikely to disturb, disrupt or affect any European or Aboriginal heritage or archaeological artefacts.
- Is not on flood liable land and will not impact flood behaviour on surrounding properties.
- Will be adequately serviced, with only minor augmentation required for all utilities, and
- Will deliver improved landscaping, deep soil and tree canopy outcomes on site.
- Any impacts in relation to construction activity (noise and vibration) can be appropriately mitigated and managed by the preparation of a Construction Management Plan.

All other impacts, including wind, noise, stormwater, waste and contamination can be managed through appropriate mitigation measures.

6.2.2 Social and Economic

The proposed development as amended will result in the same positive social impacts as noted in the EIS by:

- Increasing the supply of much needed affordable housing.
- Encouraging social cohesion through the provision of associated amenities and communal facilities for residents including the provision of co-working spaces, a communal room and communal open space and the site through link along the eastern side as well as the inclusion of a small retail tenancy which will service the development and broader community.
- The development will enhance connectivity and encourage much needed activation in this part of the precinct.
- The proposal will increase diversity, inclusion and provide greater equity in housing delivery.
- Will provide employment through the construction and longer-term management of the development.
- The provision of 3 car share spaces will provide an additional service for the residents and community.
- The delivery of a well-designed, high-quality development that will positively contribute to the streetscape, and character of the area.
- A development that is strongly aligned to the overall vision for Edmondson Park and the approved Concept Plan (as amended) that will result in very limited, if any, irreversible environmental, social or economic impacts.

The economic benefits associated with the proposed development include the creation of construction jobs (approximately 161 full time positions) and will provide the opportunity to create permanent operational roles to manage the development and utilisation of the retail tenancy. The future residents of the development will also contribute to the local retail and service economy.

6.3 Site suitability

Having regard to the characteristics of the site and its location, the proposed development (as amended) is suitable for the site as:

- The site is currently vacant and zoned for high density residential and mixed-use development that is generally consistent with the Concept Plan for the site and the Edmondson Park precinct.
- The provision of 100% of the dwellings to be dedicated as affordable housing for a minimum of 25 years and managed by a Community Housing Provider (CHP) is a significant positive social and planning outcome.
- The development has been designed to be undertaken in a manner that minimises impacts on the surrounds, while respecting the natural, historical and environmental qualities of the site.
- It will not result in any significant environmental impacts that cannot be appropriately mitigated or managed through adherence to the mitigation measures and/or standard conditions of development consent.

7 Conclusion

Following the public exhibition of SSD-99909708 from 19 May to 1 June 2026, the Applicant comprehensively reviewed each submission made by Government agencies, service providers and from members of the community. DPHIs key issues have also been addressed.

Amendments have been proposed to the project which have largely resulted from the detailed design phase where changes have been identified that will improve functionality, circulation, internal amenity and reduce construction costs without adversely impacting adjoining properties, the streetscape and immediate locality. Refinements in the design will not affect the overall scale, built form outcome and massing of the development as proposed. The range of design changes are considered to be minor and are summarised in **Section 6** of this report.

The proposed development will not give rise to unacceptable environmental impacts and should be supported given its many benefits.

Therefore, it is recommended that this SSDA be approved subject to standard conditions of consent, given that the proposed development:

- Is consistent with the relevant strategic planning framework and guidelines;
- Is consistent with the relevant statutory legislation and requirements;
- Will not generate unreasonable environmental impacts; and
- Is suitable for the site and is in the public interest.

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APPENDIX I

Updated Geotechnical Investigation Report

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