

Block 20a EDMONDSON PARK AFFORDABLE HOUSING

RESPONSE TO KEY ISSUES

07 — 2026

Acknowledgment of Country

Fuse Architects would like to acknowledge the traditional custodians of the land on which we live and practice, and pay our respects to elders, past, present and future. In particular, we would like to acknowledge the 60,000+ years of continuous engagement of this land by Aboriginal and Torres straight culture.

The journey of Aboriginal and Torres Strait islander people and their knowledge of this land is incredibly rich - its importance to the future of our country should never be underestimated.

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BLOCK 20a EDMONDSON PARK AFFORDABLE HOUSING

Project Address Lot 401, Lot 402, Cnr MacDonald Rd +
 Buchan Ave, Edmondson Park, NSW 2174
Project Number 2518
Phase State Significant Development Application
Version -
Date Issued 27.07.2026
Prepared by CH
Checked by AA

Version	Amendment	Date
-	Response to DPHI Key issues	27.07.2026



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1 — Introduction

1.1 PURPOSE OF THIS REPORT

Application number:	SSD - 9990 9708
Project name:	Block 20a Edmondson Park Affordable Housing Project
Location:	Cnr Buchan Avenue + MacDonald Road, Edmondson Park, NSW, 2160
Applicant:	Landcom

Introduction

This Response to Key Issues has been prepared by Fuse Architects in response to the Key Issues Letter received from DPHI (dated 1 July 2026). This is in support of an application for a State Significant Development (SSD-99909708) for infill Affordable Housing at part Lot 40 DP1286151 (future lots 401 and 402), Edmondson Park, also known as Block 20a. Block 20a is subject to development approval (DA-421/2025) which will subdivide Lot 40 into several smaller allotments. The development will be constructed on Lot 401 and relies on Lot 402 which is dedicated to becoming a future laneway.

Project Overview

As the NSW Government's land and property development organisation, Landcom has a mandate to take a lead role in improving the supply, diversity, and affordability of new housing in NSW.

Landcom aims to create innovative and productive places that demonstrate global standards of liveability, resilience, inclusion, affordability, and environmental quality, and uses its sites and close working relationships with the private sector to deliver quality, socially inclusive community places, where people can grow and thrive regardless of income levels and stages of life.

In response to the NSW Government's commitment to increasing the supply of Affordable Housing under the National Housing Accord, Landcom has committed to delivering 1,800 affordable rental housing dwellings by 2029. As part of this commitment, Block 20a at Edmondson Park has been earmarked as a suitable site for infill affordable housing.

Project Objectives

Landcom's objectives for the project are:

- Delivery of sustainable high quality affordable accommodation.
- Provide a sense of place within the development to ensure good high-quality accommodation.
- The use of robust materials that allow for long service life of the building.
- Create a building that meets the needs of the community and serves the requirements of the area.
- To establish seamless integration of cultural and sustainable objectives that align to Landcom's key principles.

Proposed Development

Landcom is seeking development consent to construct an infill affordable housing development. Development consent is sought for:

- Site preparation works;
- Earthworks and associated site works;
- Construction of:
 - One (1) level of basement car parking comprising of 59 car parking spaces, bicycle parking, storage and associated services;
 - Three (3) inter-connected buildings across the site comprising:
 - One, fifteen (15) storey building located along the north-eastern corner of the site;
 - One, nine (9) storey building located along the eastern side of the site;
 - Four, two-storey attached terraces.
 - Ground floor includes five (5) at grade parking spaces including three (3) dedicated car share spaces and two (2) retail car parking spaces;
 - Two main lobby areas which are designed to be adaptable and cater for co-working;
 - A retail unit;
 - A landscaped plaza along the eastern side of the site;
 - Small office space for a Community Housing Provider;
 - Communal room for residents on the second floor;
 - Large area of communal open space located on Level 2
 - Associated amenities for services and waste
- A total of 172 affordable housing units are to be delivered.

The proposed development has an estimated development cost that exceeds \$30million and 100% of the gross floor area of the development will be used for the purposes of affordable housing. Accordingly, the proposal is SSD for the purposes of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP).

Site Information

The proposed development site is in the Liverpool Local Government Area within the Town Centre North precinct of Edmondson Park South. Edmondson Park South is identified in the Western City District Plan as a Local Centre in recognition of its proximity to the Southwest Rail Line and the Edmondson Park Railway Station. It borders the motorway intersection of the M31, M5 and M7 with Camden Valley Way, providing excellent road access to a large extent of the Greater Sydney Metropolitan Area.

The proposed development site is a 3,385m² parcel of land currently known as Block 20a and part of Lot 40 in DP 1286151(future lot 401), Croatia Avenue, Edmondson Park (Figure 1).



Figure 1
Site location in the broader context highlighting the Edmondson Park precinct boundaries
Source: Nearmaps

2 — Response to Key Issues

BUILDING SEPARATION

DPHI Key Issue 1

DPHI COMMENT:

The Department requests that the interface conditions of windows adjoining habitable rooms and balconies between Building A and Building B be reconsidered to increase privacy and amenity or justified having regard to the ADG objectives (see Figure 1 below).

Objective 3F-1 of the Apartment Design Guide (ADG) states that building separation is to achieve reasonable levels of visual privacy and provides minimum separation distances for habitable room windows and balconies.

The proposed separation between levels 2 to 8 at Building A and Building B is 9.3m at the closest point which does not meet the design criteria of part 3F-1. As the buildings are on the same site, a minimum separation of 12m (up to 4 storeys) and 18m (5-8 storeys) is recommended.

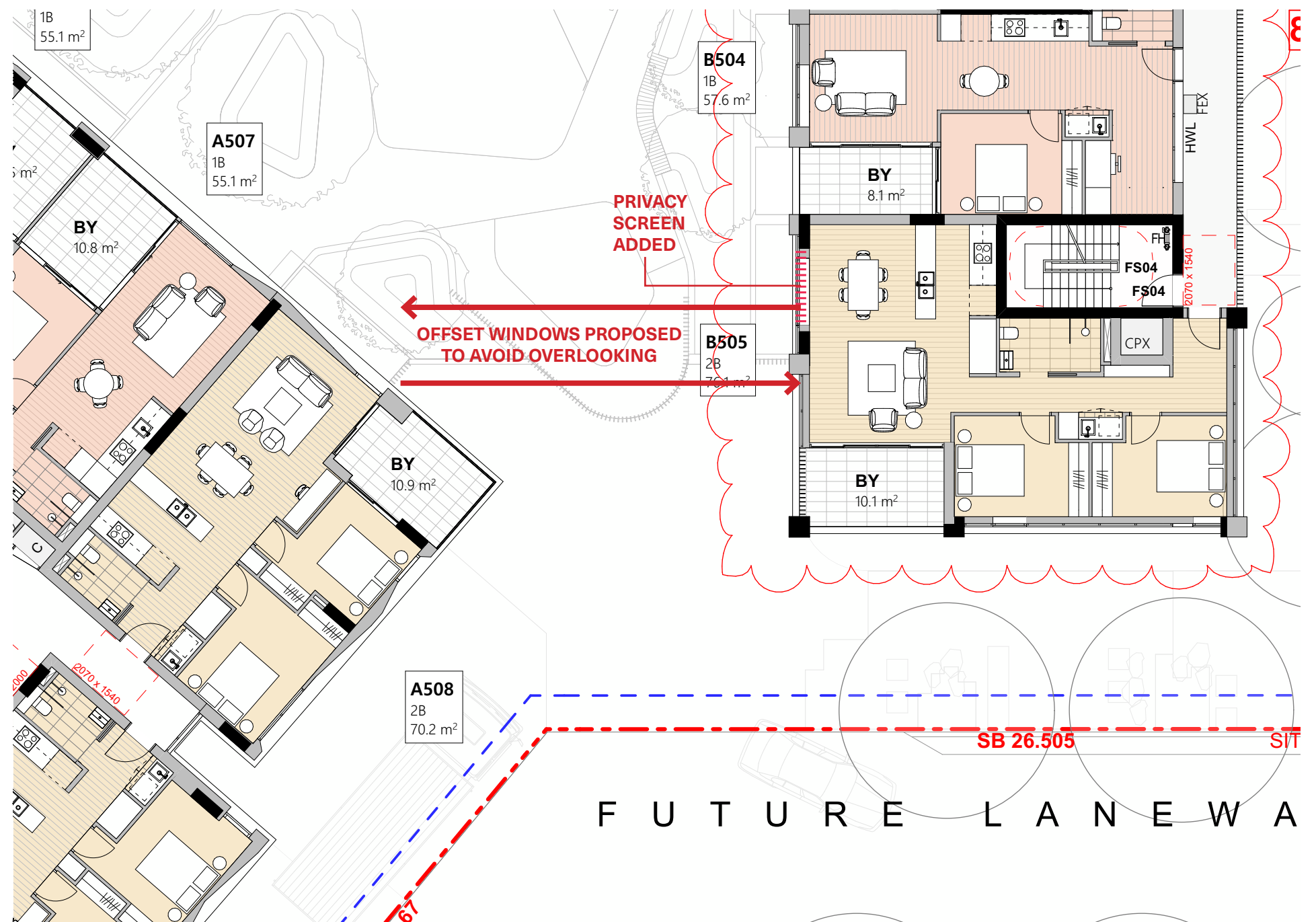


Figure 1
Typical floor plan overlay with red circle highlighting areas where interface conditions of windows and balconies should be reconsidered

DESIGN RESPONSE:

The proposed design has provided for offset windows so that the 2 units do not directly overlook each other.

An additional privacy screen is proposed to provide further privacy between the 2 units.



SUBSTATION

DPHI Key Issue 2

DPHI COMMENTS:

The Department requests that the location of the substation fronting Buchan Avenue be reconsidered. In its current location, the substation adversely impacts residential amenity, reduces the opportunity for planting to the side setback and detracts from the overall presentation of the building in the streetscape.

It is noted that the State Design Review Panel recommended the substation be relocated into the central services area and the Department requests this option be further explored.

DESIGN RESPONSE:

A number of options were explored as part of the SSDA process (for a range of locations as well as types that included the mini chamber) to arrive at the proposed solution. Considering the HV network location, EE access requirements, constructability, spatial constraints, and cost implications, a padmount substation located along Buchan Avenue is considered the most suitable solution for this development.

The existing EE high voltage (HV) network is located along Buchan Avenue, directly adjacent to the development frontage. The proposed development substation will connect to this existing HV network. Therefore, locating the substation along Buchan Avenue is considered the most suitable arrangement, as it minimises the HV feeder extension requirements and avoids additional costs associated with extending the HV network towards the future Macdonald Road connection.

In accordance with Endeavour Energy standards, including MCI0006 and MDI0028, substations are required to be located at the front boundary with 24/7 access from a public street. The proposed indoor substation location does not satisfy these requirements, as it does not have direct access from a public road and is offset from the future laneway. This arrangement may create difficulties for the delivery, installation, and future replacement of major equipment, including transformers, due to restricted access for heavy vehicles and lifting equipment. A substation at this location is subject to EE approval and will require a dispensation request to be submitted to EE. The dispensation request will need

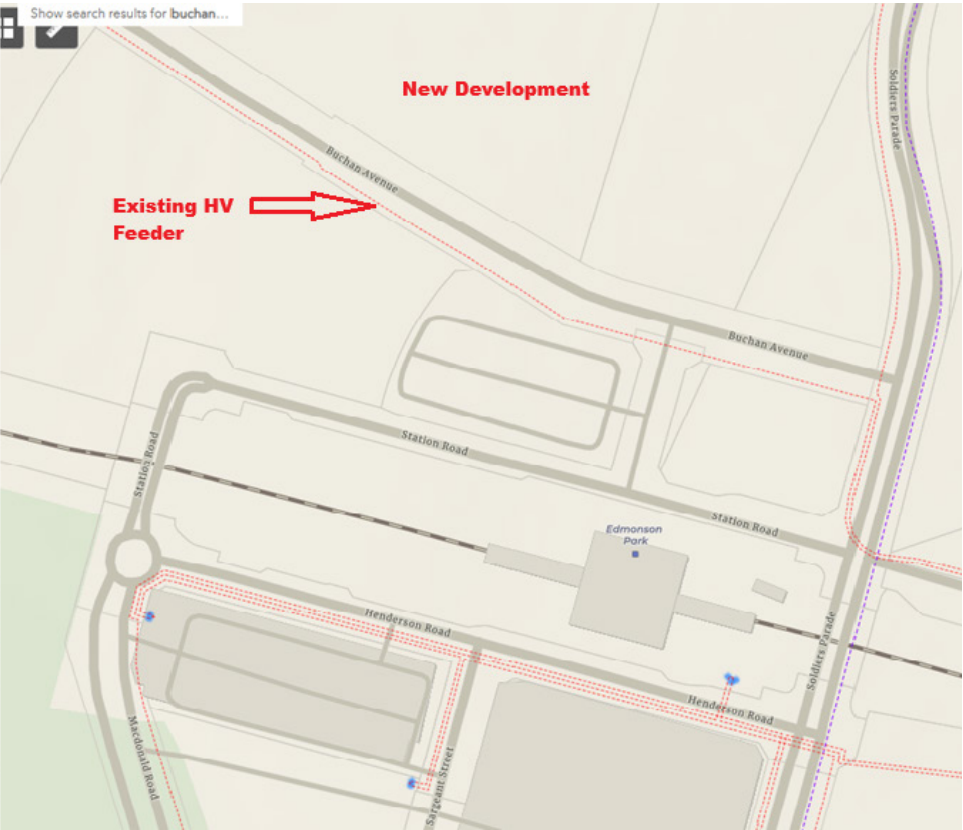
to be accompanied by a transformer delivery methodology from an ASP Level 1, and detailed drawings showing the access route and slope. A Right of Way will also need to be established on the property title for EE access the substation.

From a cost and spatial perspective, a padmount substation provides a more practical solution compared with an indoor substation. An indoor substation requires additional structural and architectural provisions, including a dedicated substation room, fire-rated construction, ventilation, and equipment access requirements. Based on a high-level cost estimate, an indoor substation is approximately \$350,000 (excludes building costs) compared with approximately \$200,000 for a padmount substation.

The indicative footprint requirements are also greater for an indoor substation, with a size of 5.7 m × 4.6 m (internal dimension) and 2 hr fire rated walls ceiling and floor, compared with a padmount substation footprint of 5.5 m × 2.75 m (overall site area required). In addition, an indoor substation requires a minimum 1.5 m × 1.5 m hardstand area at the frontage to facilitate equipment delivery and unloading.

As part of the landscape design, the area around the substation will be screened with planting and the kiosk itself will become an opportunity for public art that speaks to Country. This will be investigated during the Detailed Design stage.

Existing HV Feeder Location



Landscape & Public Art



SUBSTATION

DPHI Key Issue 2

SUBSTATION OPTIONS EXPLORED

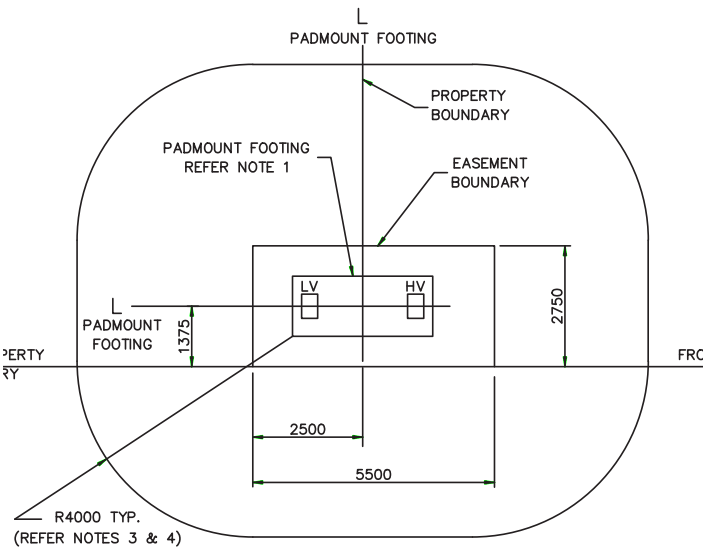
The existing EE high voltage (HV) network is located along Buchan Avenue, directly adjacent to the development frontage.

In accordance with Endeavour Energy standards, including MCI0006 and MDI0028, substations are required to be located at the front boundary with 24/ 7 access from a public street. Substations at these locations are subject to EE approval and will require a dispensation request to be submitted to EE. The dispensation request will need to be accompanied by a transformer delivery methodology from an ASP Level 1, and detailed drawings showing the access route and slope. A Right of Way will also need to be established on the property title for EE access the substation.

PADMOUNT



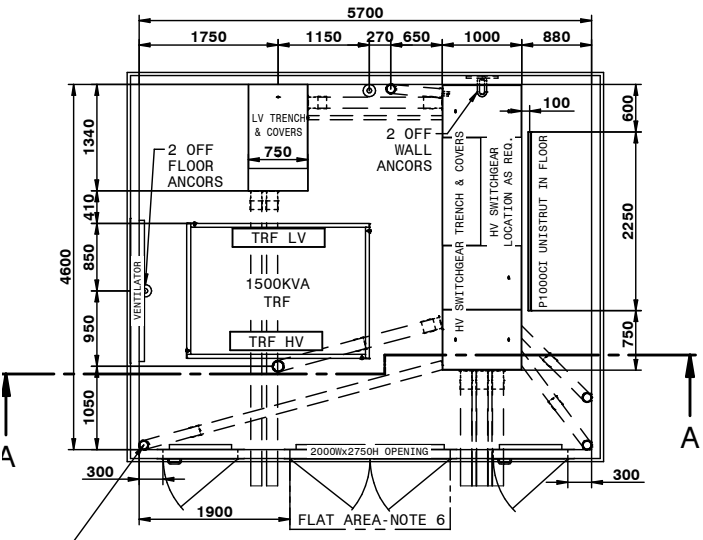
- From a cost and spatial perspective, a padmount substation provides a more practical solution compared with an indoor substation.
- Approximately \$200,000 (excludes building costs)



INDOOR MINI CHAMBER SUBSTATION



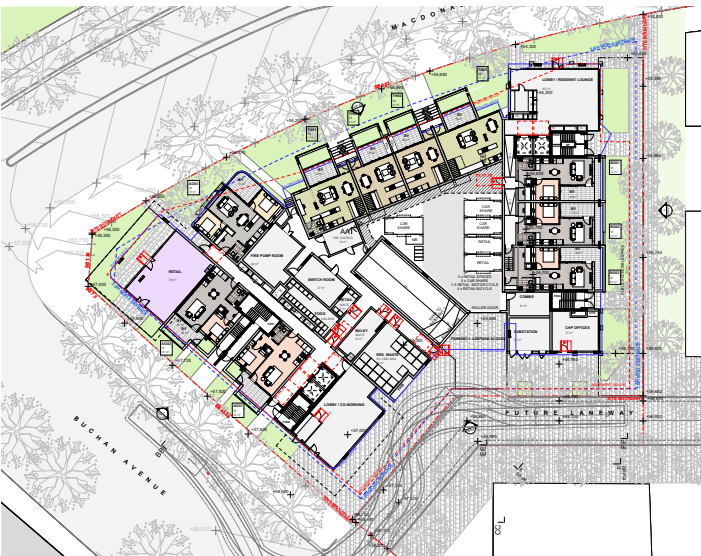
- An indoor substation requires additional structural and architectural provisions, including a dedicated substation room, fire-rated construction, ventilation, and equipment access requirements.
- Approximately \$350,000 (excludes building costs)



INDOOR MINI CHAMBER SUBSTATION OPTION A



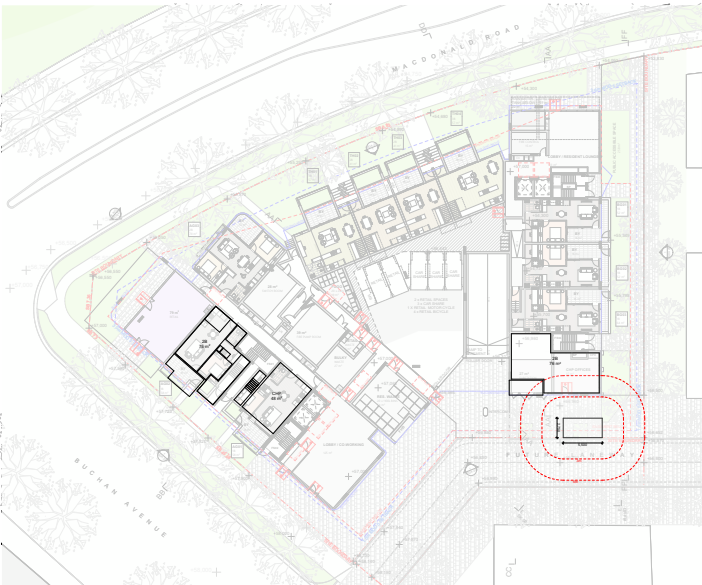
- Increased inactive frontages along laneway
- Additional costs required to extend the HV network
- Location does not have direct access from a public road and is offset from the future laneway making delivery, installation, and future replacement an issue
- Bigger footprint required compared to a padmount.



PADMOUNT OPTION B



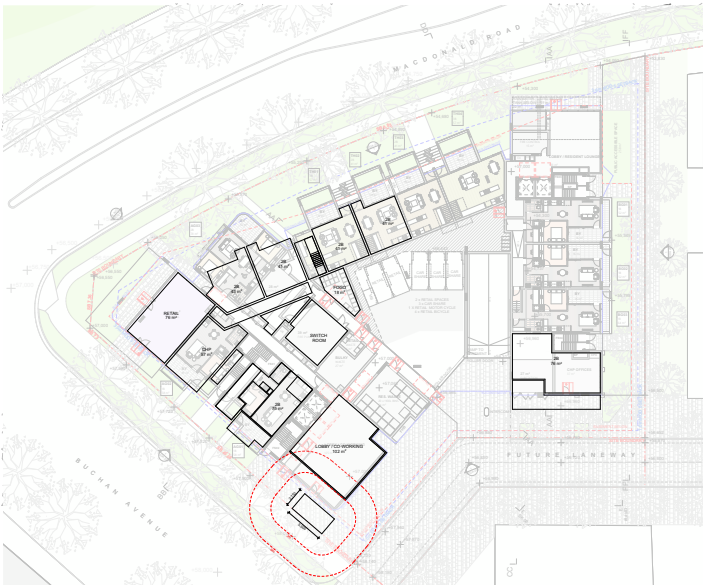
- Maximises active frontages to laneway
- Location on key corner approach not ideal for services
- Additional costs required to extend the HV network
- Location does not have direct access from a public road and is offset from the future laneway making delivery, installation, and future replacement an issue



PADMOUNT OPTION C



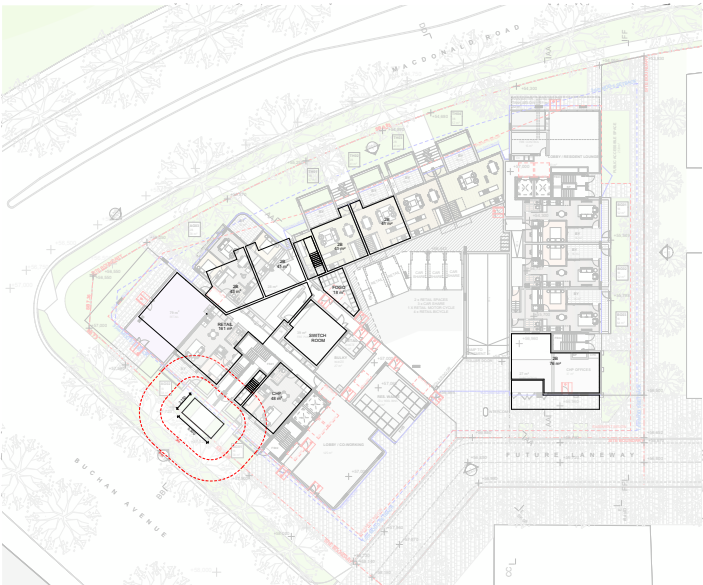
- Maximises active frontages to laneway
- Location on key corner approach not ideal for services
- Additional costs required to extend the HV network



PADMOUNT OPTION D - PREFERRED OPTION



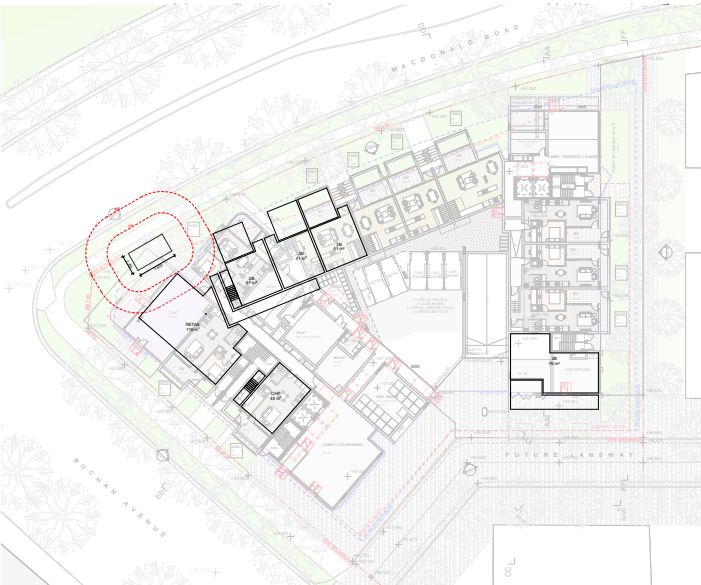
- Located away from key corners
- Maximises active frontages to laneway
- Connects to existing HV network, minimises HV feeder extension requirements and avoids additional costs associated with extending the HV network



PADMOUNT OPTION E



- Maximises active frontages to laneway
- Location on key corner approach not ideal for services
- Additional costs required to extend the HV network



BASEMENT

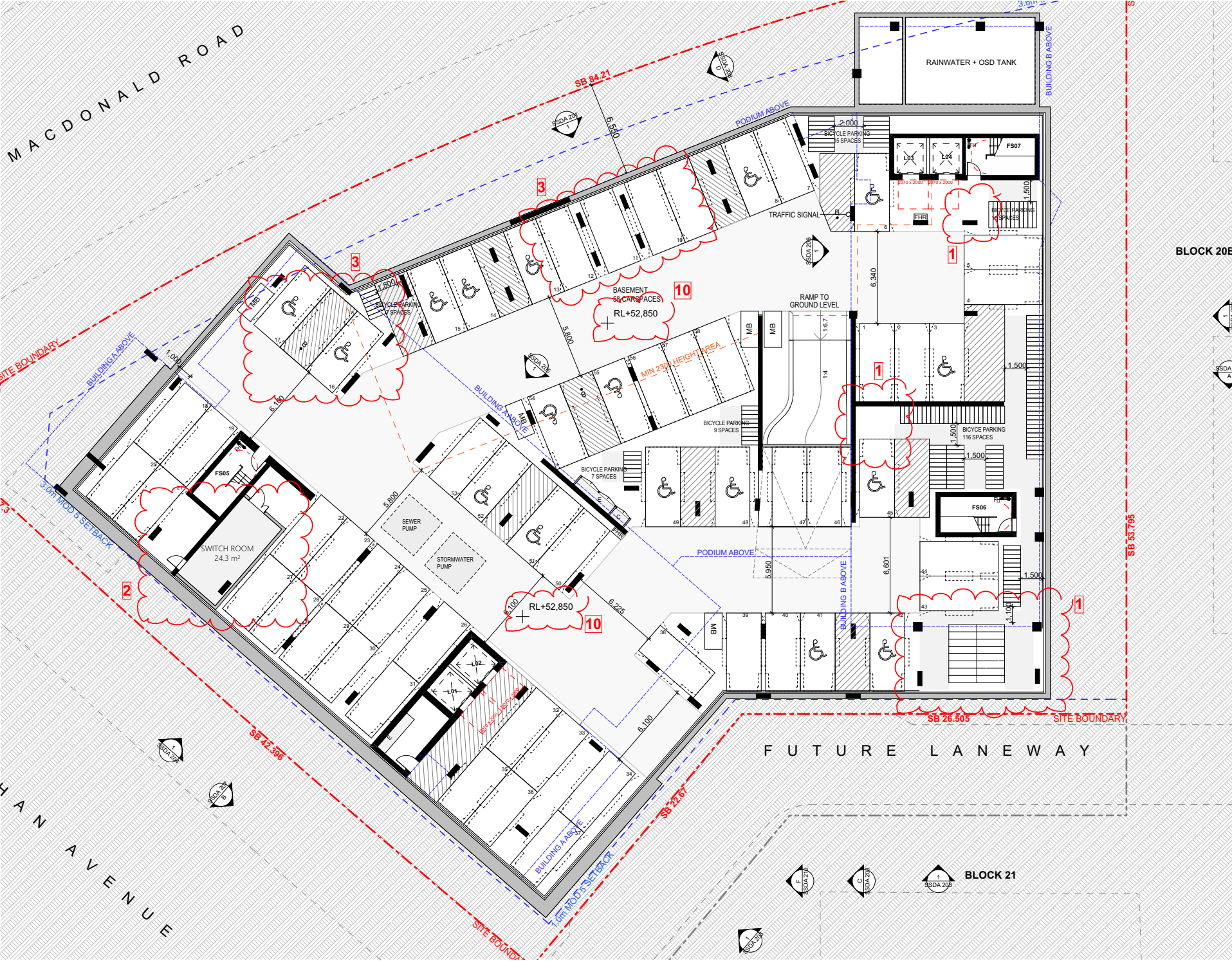
DPHI Key Issue 3

DPHI COMMENTS:

Basement 01 Plan shows car parking spaces including 38, 54, and 58 overlapping with adjoining spaces or walls. The Department requests that you confirm all car parking spaces comply with the required minimum dimensions and do not intersect with other components in the basement.

DESIGN RESPONSE:

Updated plans are provided confirming all car parking spaces comply with the required minimum dimensions and do not intersect with other components in the basement.



BASEMENT

DPHI Key Issue 4

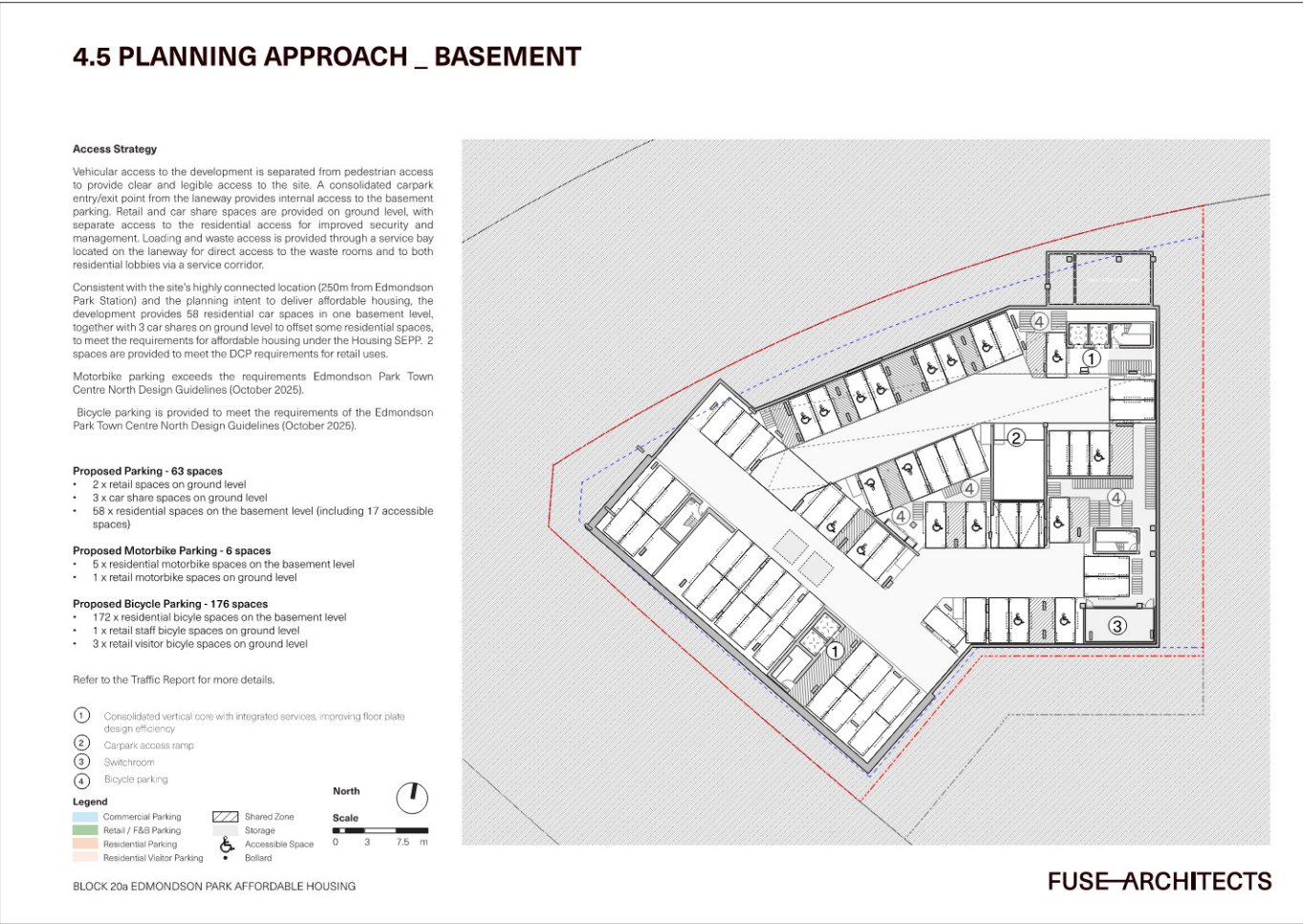
DPHI COMMENTS:

Inconsistencies have been identified between the Design Report and Basement 01 Plan regarding the location of the switch room, bicycle parking and storage. The Department requests clarification and consistency across all documentation on the location of these components.

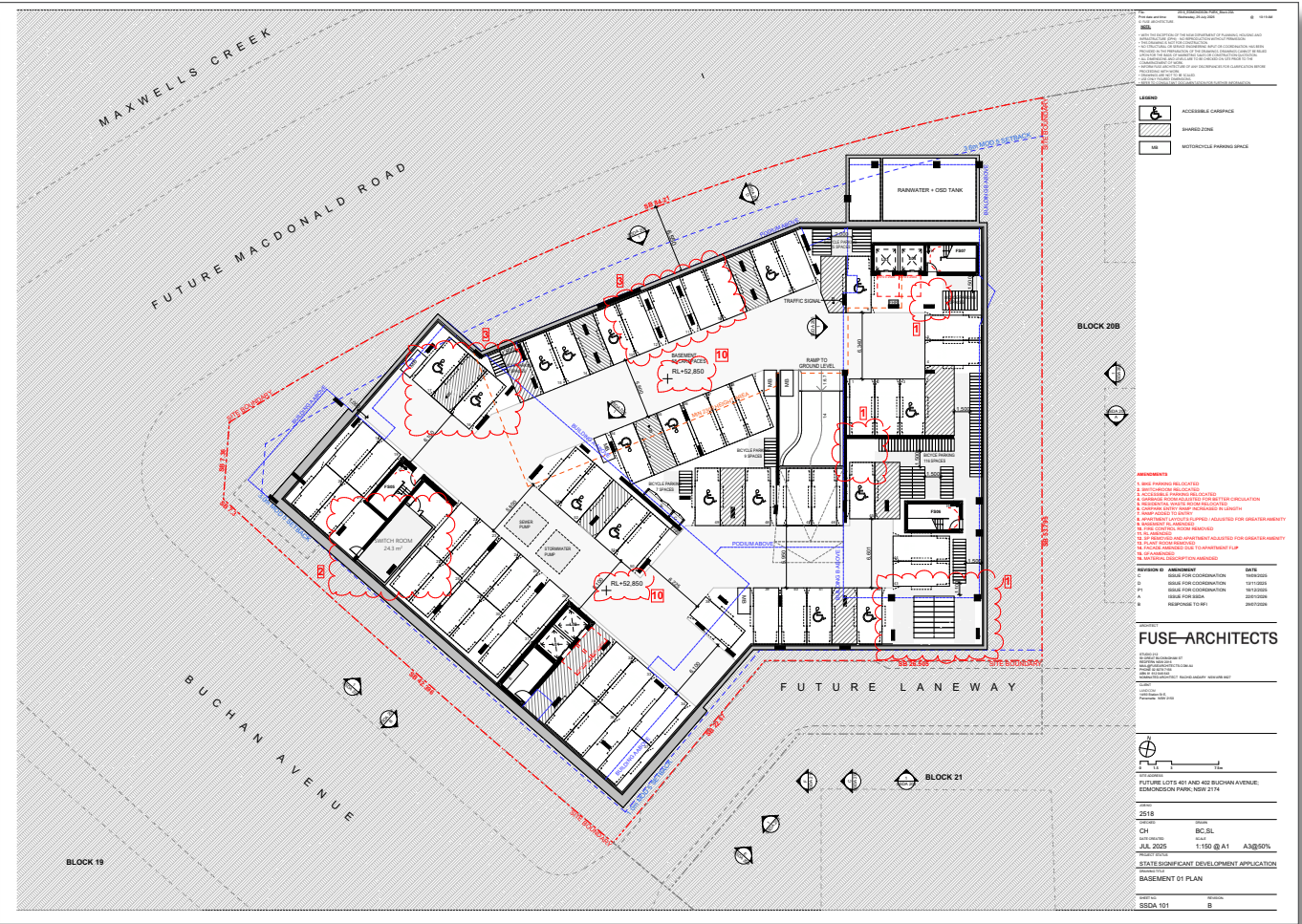
DESIGN RESPONSE:

Inconsistencies have been checked and corrected across all documentation.

Updated Report page 34



Updated basement plan



COMMON CIRCULATION

DPHI Key Issue 5

DPHI COMMENTS:

The Department requests further justification of the proposed common circulation arrangement and clarification on lift speeds. It is noted that 64 apartments in Building A would share a single lift, which exceeds the design criteria of Objective 4F-1 of the ADG. The Department requests that this be addressed, including whether criteria is met or proposed design amendments.

DESIGN RESPONSE:

Lift traffic analysis is provided that demonstrates the criteria of Objective 4F-1 of the ADG is met. The proposed lift and handling capacity of the proposed lifts will ensure that the amenity requirements (waiting times) will be met with the proposed number of lifts. Although the proposal departs from the guidance of the ADG of 1 lift / 40 units, the proposed lift cores have the capacity to provide good amenity and can properly service the number of apartments.

Good residential amenity is achieved through the following performance criterias:

- Handling Capacity (HC) - The lift system comfortably moves a target percentage of the building population during a 5-minute peak period.
- Average Waiting Time (AWT) - The time a resident waits for a lift should be kept strictly under 45 to 60 seconds.
- No Congestion
- System Redundancy - Multiple lifts so that if one is out of service, the remaining lifts can handle the load without system saturation.
- Move-in/Move-out Management - The lifts have programmed service modes that can accommodate furniture deliveries and waste management without causing excessive delays for residents.



Edmondson Park - Block 20A

Project No. SYD3927
Date 18/06/2026
Engineer M. Smith
Status Preliminary
Revision 2

Building Overview			
Level	Height (m)	RL (m)	Description
Roof		106.6	Roof
Level 14	3.3	103.3	Residential Units
Level 13	3.2	100.1	Residential Units
Level 12	3.2	96.9	Residential Units
Level 11	3.2	93.7	Residential Units
Level 10	3.2	90.5	Residential Units
Level 9	3.2	87.3	Residential Units
Level 8	3.2	84.1	Residential Units (Top of East Tower)
Level 7	3.3	80.8	Residential Units
Level 6	3.2	77.6	Residential Units
Level 5	3.2	74.4	Residential Units
Level 4	3.2	71.2	Residential Units
Level 3	3.3	67.9	Residential Units
Level 2	3.2	64.7	Residential Units
Level 1	3.2	61.5	Residential Units
Ground	4.5	57.0	Resi. Units / Main Entrance / Car Park
Basement 1	3.6	53.4	Resi Car Park
TOTAL:			

West Tower					
1-Bed	2-Bed	3-Bed	TTL Apts	Pop.	CP
1	5	3	9	29	
1	5	3	9	29	
1	5	3	9	29	
1	5	3	9	29	
1	5	3	9	29	
1	5	3	9	29	
3	5	1	9	24	
3	5	1	9	24	
3	5	1	9	24	
3	5	1	9	24	
3	5	1	9	24	
2	5	1	8	23	
2	3	5	18		14
2	1		3	7	
28	68	28	124	366	67

Lift Service	
1	2
Overrun	Overrun
Passenger Lift	Passenger Lift
Passenger Goods Lift	Passenger Goods Lift
Overrun/Pit	Overrun/Pit

East Tower					
1-Bed	2-Bed	3-Bed	TTL Apts	Pop.	CP
3	2		5	11	
3	2		5	11	
3	2		5	11	
3	2		5	11	
3	2		5	11	
4	1	4	9	26	
	4		4	12	5
					18
22	17	4	43	107	23

Lift Service	
3	4
Overrun	Overrun
Passenger Lift	Passenger Lift
Passenger Goods Lift	Passenger Goods Lift
Overrun/Pit	Overrun/Pit

Architectural Reference Documentation
Fuse Architects "SSDA ISSUE" 22/01/2026
Analysis Reference Criteria and Methodology
ISO 8100-32:2020 Simulation Method for 'Standard' residential type buildings as per recommendations of AS 1735.1.1
Notes & Assumptions
- Results are theoretical only - Main entry floor on Ground. - Fully occupied residential building. - Lifts are for resident's use only (i.e. excludes visitors movements from analysis). - Goods movements occur outside of peak-periods only. - Resi CP spaces distributed across each tower as a ratio of the total no. of apartments per tower. - Carpark utilisation entry bias of 15% has been allowed (based on ITE Traffic Generation Data - CP Usage for 'Multifamily Housing - High Rise')
Definitions
- Handling Capacity (Lifts): The total number or percentage of a building's occupants that a lift system can transport in a period of five minutes - Average Waiting Time (AWT): The theoretical average time that a passenger waits for a lift car measured from the instant that the passenger registers a landing call until the instant the passenger enters the car - Nominal Travel Time (t_n): The theoretical time for a lit to travel from the lowest floor to the highest floor without any stops at rated speed

No Lifts
Machine Type
Control System
Rated Speed
Load Rating
Passenger Rating
Analysis Type
Handling Capacity (HC, min)
Avg Waiting Time (AWT, limit)
HC
AWT
Criteria Satisfied?

Specifications
Two (2) MRL Conventional 1.6 m/s 1275 kg 17 ppl
Analysis Criteria
ISO Resi Sim 7% ≤ 60 s
Results Summary
7% 41 s Yes

No Lifts
Machine Type
Control System
Rated Speed
Load Rating
Passenger Rating
Analysis Type
Handling Capacity (HC, min)
Avg Waiting Time (AWT, limit)
HC
AWT
Criteria Satisfied?

Specifications
Two (2) MRL Conventional 1.0 m/s 1275 kg 17 ppl
Analysis Criteria
ISO Resi Sim 7% ≤ 60 s
Results Summary
7% 11 s Yes

COMMON CIRCULATION

DPHI Key Issue 5



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