

Ref: SSD-64388218

Date: 20 November 2024

The Department of Planning, Housing and Infrastructure  
Major Projects  
Attention: Courtney Fung

Dear Courtney,

**Re: SSD-64388218**

**Property: 1A Lyons Road, Drummoyne - Scalabrini Harbourside Seniors Housing  
Drummoyne**

Council has reviewed the matters seniors housing development at 1A Lyons Road Drummoyne and raises the following objections to the proposal as they relate to Foreshore Access, Waste and Traffic.

It is acknowledged that matters outlined in this submission are likely to be readily resolved through amended plans and or additional information. Council is willing to review any response to our concerns outlined below:

**Public Foreshore Access**

Council acknowledges that public foreshore access on the site does not currently exist. However, the redevelopment of this site, as proposed in the subject SSD, presents a unique opportunity to provide public foreshore access. This foreshore access would be an integral component in linking existing and future developments along the foreshore, across the subject site, and to the pocket park 'Little Sisters of the Poor Reserve' positioned at the end of Lyons Road.

The proponent's position on foreshore access, outlined in clause 7.4.3.1 of the Environmental Impact Statement is noted. However, the City of Canada Bay Foreshore Access Strategy recognises the difficulty in realising a truly integrated foreshore access across the Canada Bay LGA, and to this point the foreshore access strategy clearly identifies that foreshore access is only possible when sites undergo redevelopment, such as proposed under this application.

The creation of foreshore access across the site would need to be cognisant of the sensitive uses within the development and that separation from public and private land may be required. It is also noted that a new gate for pedestrian access from the Reserve/Lyons Road to the café/kitchen (boatshed) is proposed. Foreshore access could continue from this pedestrian access point, beside the café and along the water's edge of the site enabling connection for neighbouring developments when they develop.

## **Waste**

A review of the waste management plan and architectural plans have identified the following non-compliances with Council's Development Control Plan:

1. **Pathways and Bin Movement:**

For the Como and Piacenza blocks, there is insufficient information about the pathways and methods for moving bins from bin rooms to collection points. Additionally, the pathways and travel distances from any dwellings to the bin storage areas need further clarification, as it appears they may exceed the 30m limit.

2. **FOGO Bin Placement and Storage:**

There is inadequate information about the placement and storage of FOGO bins for the Como and Piacenza blocks. The travel distance for FOGO bins seems to exceed 30m, and the e-diverter/chute discharge rooms appear too small. Therefore, designated FOGO rooms need to be provided for both the Como and Piacenza blocks.

3. **Bulky Waste Storage Room:**

The width of the bulky waste storage room door in the Piacenza block is 1500mm, which does not meet the minimum requirement of 1800mm. The pathway to present bulky waste for collection must always be wide enough and free from obstructions and stairs. The bulky waste room is currently only located in the Piacenza block. A similar bulky waste room should be provided in the Como block for practical reasons. Additional information is needed regarding the travel pathway for bulky waste disposal, as the travel distance appears to exceed 30m. The width of the bulky waste rooms should be at least 1800mm.

4. **Large Cardboard Storage:**

There is insufficient information regarding the storage of large cardboard, particularly with respect to the waste rooms in the basement level. The rooms appear too small to accommodate e-diverter/chute discharge, waste bins, and large cardboard, especially in the Como block. More information is required on the movement of bins from the e-diverter/chute and other bins.

5. **E-Diverter System Issues:**

Council discourages the use of e-diverters, as they will not function during power outages, and the waiting time for disposal in the system can be too long. Council has found that dual chute systems are more reliable. The e-diverter rooms should also be locked and not accessible to residents.

6. **Insufficient Waste Room Area:**

The total waste room area across the Como and Piacenza blocks is only 37m<sup>2</sup>, whereas the required area should be approximately 46m<sup>2</sup>. In the Como block, there is only one waste room, which is too small for 34 units.

7. **Waste Collection Area and Presentation:**

More information is needed regarding the waste collection point and presentation. There is no information about the bin collection area dimensions, which should be a minimum

of 80m<sup>2</sup>. Additionally, missing details about the bin transportation pathways from the waste rooms to the collection area need to be addressed. The bin collection area also seems to be located far from the building blocks. Furthermore, the architectural plan labels this area as a "temporary bin storage/loading area," while the Waste Management Plan designates it as "temporary bin storage." More clarification is needed regarding the intended function of this area.

8. **Onsite Waste Collection Vehicle Access:**

The proposed onsite waste collection area does not accommodate the required waste collection vehicle dimensions, height clearance, and gradient. The area should be designed to accommodate an HRV (12.5m length, 4.5m height clearance, 1:6.5 gradient).

9. **Kerbside Collection Issues:**

The kerbside waste collection procedure requires more information. The waste bins presented at the kerbside collection point, as per the Waste Management Plan, do not comply with the following requirements:

- a. The space at the kerbside exceeds one-third of the property width.
- b. The pathway for wheeling bins between dwellings exceeds 30m and does not meet the required gradient of 1:14.
- c. The kerbside collection must also comply with the traffic management plan for truck movement and reversing on the street.

10. **Separation of Residential and Commercial Waste:**

The residential and commercial waste rooms are not adequately separated. They lack proper keys, locking systems, and physical barriers, allowing access between the two areas. Additionally, waste generated in commercial communal areas should be separated from residential waste.

11. **Commercial Waste Presentation:**

No sufficient information has been provided regarding how commercial waste will be presented at the waste collection point. The pathway for commercial waste should be separate from residential waste pathways, free from obstructions, and not accessible from the residential waste holding room.

12. **Cafe Bin Enclosure:**

The cafe bin enclosure does not indicate the required number of bins for each waste stream. The Waste Management Plan and disposal methods need further clarification due to the lack of information provided.

13. **Medical and Aged Care Waste:**

No information has been provided regarding the management and storage of medical and aged care waste. Waste management provisions for these types of waste need to be addressed.

14. **Recycling and Special Waste Streams:**

For all multi-unit dwellings with more than 20 units, additional space is required for

recycling textile waste, such as a clothes bin. The required space is 1m<sup>2</sup> per 50 units, up to a maximum of 2m<sup>2</sup>, and should be located within or adjacent to the waste storage area. Consideration should also be given to allocating space for the recovery of items such as printer cartridges, toner bottles, and mobile phones, as these can be recovered by the private sector at no charge. Implementing these recovery options will help reduce the overall waste generated at the development site.

## **Traffic**

The following comments are identified by our Traffic Engineers to the proposed redevelopment:

### **1. Service Vehicle:**

Section 3.5 of the Traffic Report (Sept 2024) mentions that a B99 vehicle will be used for loading and can be accommodated in the basement level carpark of Como Building, and a 6.4m Small Rigid Vehicle (SRV) within the Como Building port cochere. It is also proposed that delivery vehicles will use the waste bin collection area near the car park landing of Piancenza Building. However, this does not comply with Council DCP Control C11 (page B-42) where a 12.5m Heavy Rigid Vehicle (HRV) is used for waste collection. A turning manoeuvre assessment shall be provided for 12.5m HRV using the proposed vehicle crossing layout. Plans shall demonstrate compliance with this requirement prior to the issue of a development consent.

### **2. Site Access:**

- a. Section 3.2 and Appendix C (Swept path analysis) of the Traffic Report present two entry/exit accesses on Lyons Road and one exit access on St. Georges Crescent. However, this is not consistent with what is shown in the Architectural Plans (page 12 of 51) where the two access points on Lyons Road are only used as entry access. Proponent to confirm/update and reassess accordingly.
- b. Appendix C (Swept path analysis) does not include swept path assessment on the access driveway to the Piancenza basement. Proponent to undertake swept path assessment using vehicles envisaged to access the Piancenza building.
- c. Should the two access driveways on Lyons Road allow for two-way movement (see comment 2a above), Appendix C (Swept path analysis) should include swept path assessment to test whether two-way movement through the ramps and access driveways are feasible. If this is not feasible, there needs to be a system to minimise the potential for conflict between entering and exiting vehicles (i.e a system of traffic signals is required to be installed to indicate traffic movement on all the carpark ramps)
- d. Exit access driveway on St. Georges Crescent:
  - i. Section 7.6 of the Traffic Report only discusses sight distance assessment on the two access driveways on Lyons Road. As for the access driveway on St. Georges Cres, the sightlines at the access driveway are to be designed in accordance with Figure 3.3 of AS2890.1:2004. Any objects including landscaping within the splay of a minimum of 2.5m by 2.0m adjacent to the driveway at the property boundary shall have a maximum height of 600mm above the internal driveway level. Plans shall demonstrate compliance with

the sight distance requirements of AS/NZS2890.1:2004 prior to the issue of a construction certificate.

3. **Trip Distribution:**

The inbound movement on Figure 24 of the Traffic Report does not reflect the two entry access points on Lyons Road. Please update and reassess accordingly.

4. **Headroom clearance**

Clearance in the Piancenza Basement does not meet the AS2890.6 requirement. As mentioned in the traffic report, a review of acceptance of this non-compliance needs to be undertaken by an accessibility consultant and should be submitted to Council for consideration prior to issue of construction certificate.

5. **Green Travel Plan:**

The Transport Access Guide (TAG) should inform residents, staff, and visitors of the proposed development of the available car and bicycle parking spaces, end-of-trip facilities provided by the site, and public transport in the vicinity to/from the site to further encourage the use of other modes of transport.

Should you have any enquires please contact the undersigned at 9911 6441 or [shannon.anderson@canadabay.nsw.gov.au](mailto:shannon.anderson@canadabay.nsw.gov.au)

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'S/A' followed by a long horizontal stroke.

Shannon Anderson  
Manager Statutory Planning