



Your Reference SSD-77260958
Michelle Niles
Department of Planning, Industry and Environment
Via Major Projects Planning Portal

23 May 2025

**Submission to SSDA
20-24 Railway Parade and No.2-4 Burleigh Street, Burwood
Mixed Use Development**

Thank you for your correspondence inviting Burwood Council to comment on the State Significant Development Application (SSDA) and submitted documentation relating to the Mixed Use Development at 20-24 Railway parade and No. 2-4 Burleigh Street, Burwood.

The SSDA relates to the development of a new mixed-use development containing a hotel, commercial office premises, 48 residential apartments and basement car parking.

The 5 levels of basement parking contain a total of 138 spaces including 88 residential spaces and 2 visitor spaces for the residential apartments, 42 spaces for the hotel and 6 spaces for the commercial premises. Vehicle access to the basement is provided off Railway Parade, with an additional service access off Burleigh Street for waste collection and loading. A porte cochere entry is also provided off Railway Parade with an exit to Burleigh Street. The porte cochere will allow for drop off and pick up in front of the commercial entry for hotel guests.

The hotel includes 120 rooms at Level 20 to 31 with a lobby and café at the ground floor, function rooms and outdoor space at Level 1 and a gym and restaurant with outdoor dining at Level 2. An additional hotel restaurant and bar with outdoor seating is proposed at Levels 36 and 37.

The proposal will also contain 48 residential apartments, with 18 of these to be managed by a Community Housing Provider (CHP) as affordable housing. The residential entrance and lobby is separated from the non-residential uses. The apartments are contained within Levels 3 to 18. The affordable housing units are located from Levels 3 to 8. Communal open space for all residential apartments is located at the Level 2 podium and at the rooftop. Level 33 to 35 consist of the commercial office levels, which provide for a combined total of 998m² of commercial GFA.

This submission is not conclusive or able to cover all potential issues given the tight timeframe.

Council supports the provision of significant development at 20-24 Railway Parade and 2-4 Burleigh Street and acknowledges the increasing need to provide more affordable housing within the Burwood Local Government Area to keep up with population growth and the current Sydney Housing crisis. Notwithstanding this, Council has conducted a preliminary review of the SSDA documentation and raises the following concerns:

Clause 4.4A(5) and Clause 4.4A(6) of BLEP 2012

The site is permitted a maximum FSR under the BLEP of 6.6:1 in accordance with clause 4.4A(5) subject to the provision of community infrastructure and the limitation on residential development.

Council has a specific policy [Carrying Out Bonus Development in the Public Interest](#) which specifies how these provisions can be utilised. The applicant has not engaged with Council regarding accessing these provisions.

Insufficient Information

- No affordable housing has been depicted on the submitted plans. Further information is to be provided in order for Council to ascertain which units will be used for the purposes of affordable housing.
- Insufficient information has also been provided with relation to cost of works details

Heritage

- A heritage assessment of the potential impact on the adjoining locally listed terraces and church is to be provided with meaningful strategies to mitigate impact.
- The development needs to be set back from north-west corner to provide a curtilage to the church to the west that is listed as a local heritage item.
- The site previously contain the 'AC/DC house' until demolished by the applicant in December 2024. Any redevelopment is to provide meaningful acknowledgment of the former house and the contribution of the band to Australian music culture.

Traffic

- The proposed four (4) driveways are not supported.
- The proximity of the porte-cochere to the intersection of Railway Parade and Burleigh Street is not supported
- Waste facilities are to be provided onsite. No street presentation will be supported.
- All residential waste facilities including any loading area are to comply with Council's standards including waste vehicles.
- Bicycle parking is to meet DCP controls as a minimum
- All car parking is to comply with Australian Standards and Council's DCP provisions
- All visitor car parking is to be provided at the upper basement levels
- All parking must be provided on-site per Council's DCP requirements for B4 Mixed use zone parking requirements.
- The design of bicycle parking facilities (racks and lockers) must be in accordance with the provisions of Australian Standard 2890.3 – Parking Facilities or Cycling Aspects of Austroads Guides.
- Provide parking spaces and accessible pedestrian paths for people with disabilities per AS/NZS 2890.6 and Council DCP requirements.
- All the parking module dimensions must be designed per AS/NZS 2890.1:2004 - Section 2.4.4 – parallel parking in parking aisles.
- Sight lines for vehicles exiting the property must comply with AS2890.1 Figure 3.3, including no visual obstructions along the first 2.5 metres within the boundary of the driveway.
- The access driveway, arrangement of internal roadways and aisle width must be designed per AS/NZS 2890.1:2004
- Provide information in relation to driver sight distance/visibility requirements based on a minimum gap sight distance of 5 seconds in accordance with AS2890.1 - 2004 published by Standards Australia and also in Chapter 3.4 Site Distance at Property Entrances (Austroads 2009).
- Given the current restricted parking restrictions along Railway Parade Road and the high demand for parking in this area is in not expected that a compliant egress from the site would be possible.
- All car parking spaces, garages, waste collection and vehicle manoeuvring driveways shall be designed so that vehicles can easily enter and leave the premises by movement in a forward direction.
- Removal of on-street public parking to facilitate a private development is not supported.

- Clearly label on-site parking areas for hotel visitors, commercial, residents and residential visitors.

Livability

- An entire glass façade is not supported due to heat load and the requirement for continuous artificial cooling and heating
- Liveability initiatives are to be identified
- The two floors of plant are to be justified with a mechanical engineers report

Building Separation

- Concern is raised regarding site isolation to the site to the east.
- 'Privacy' glazing is an inappropriate treatment to a constrained site and would limit development potential of adjoining sites
- ADG compliance is required in terms of separation. This is to be shown on floor plans

Site Planning

- The applicant is to demonstrate an integrated approach to the block to allow connectivity and integration with the surrounding sites. This needs to extend to the wider network of buildings to the Burwood town centre including how the site will integrate with any through site links. The current design treats the site in isolation.
- No ground floor modelling, place making, public art or wayfinding information has been provided
- No modelling for railway noise has been provided
- No stormwater details have been provided.
- Confirmation is required that one substation will be sufficient to support the new building including basement EV charging
- Booster locations are to be provided
- Any affordable housing apartments are to be identified with specific unit numbers given
- ADG compliance is to be shown on plans including depth of apartments, apartment sizes, cross vent, solar access, storage, private open space size and dimensions etc
- Communal open space needs to be shown on the plans
- Deep soil calculations are to be provided
- Any AC for individual units is to be shown on plans
- Back of house facilities including linen store is to be accommodated and shown on plans

Environmental Health

- An Environmental Management Plan will need to accompany the application.
- An acoustic Report is to be prepared near Railway Corridors and Busy Roads by a qualified engineer. The Acoustic Report is to be submitted with the development application. The report must demonstrate how the site planning and building design minimise noise impacts inclusive of plant rooms, air conditions/comfort ventilation system and the like.
- A car wash bay is to be provided within the basement level carpark that is graded and drained to waste disposal system.
- A stage 1 contamination report is to be provided.
- A plan of management is to be provided regarding the hotel function use and restaurant areas.

Urban Design

The site is located within the MU1 Zone and as such the Design Excellence provisions of Clause 6.5 of the Burwood Local Environmental Plan apply. Specifically, the provisions require the highest standard of architectural, landscape and urban design.

The applicant had not demonstrated the following clauses have been met or addressed:

- (a) whether a high standard of architectural, landscape and urban design has been achieved (including in the materials used and in detailing appropriate to the location, building type and surrounding buildings),
- (b) whether the form and external appearance of the proposed building, and ground level detailing, will significantly improve the quality and amenity of the public domain,
- (c) how any streetscape and heritage issues have been addressed,
- (d) whether the amenity of the surrounding area, including any view corridors, vistas or landmark locations, will be adversely affected,
- (e) how traffic circulation and vehicular access will be addressed and whether the proposed development supports the provision of high quality pedestrian, cycle and service access,
- (f) whether any adverse effect on pedestrian movement and experience will be avoided (and whether the public transport interchange as the focal point for pedestrian movement in the surrounding area will be reinforced and the ease of pedestrian access to and from that interchange will be facilitated),
- (g) whether the development supports an integrated land use mix in Zones E1 and MU1, including a diversity of public open spaces at the ground level, as well as the roof and other levels of buildings,
- (h) how the bulk, mass, modulation, separation, setback and height of buildings have been addressed and whether they are appropriate in the context of existing and proposed buildings,
- (i) whether a high standard of ecologically sustainable design (including low-energy or passive design) will be achieved and overshadowing, wind effects and reflectivity will be minimised.

More specifically, the following concerns are raised:

Setbacks and Separation Distances

- The proposed separation distances to the south above level 8 is less than 12m (half of 24m required by the ADG). The proposed design attempts to reduce the visual impacts through using opacified glasses; however, greater levels of separation distances provides opportunities for a better view/landscape corridors and balances the density of built form and open spaces.
- Opacified glasses which limit the view of the internal spaces are not supported as a solution to compensate for insufficient separation distances.

Presentation to the Street

- The proposal provides frontages to both Burleigh Street and Railway Parade which are heavily dedicated to vehicle entrances and ramps. The active part of façade particularly on the ground level is less than 50% of the façade which does not meet the requirements of the BDCP Part 3.2.1 P15 for the purpose of maximising the facade activation by 90%. This aims to prioritise a pedestrian environment over vehicle.
- Combining/minimising the number of vehicle entrances to the building on the ground level is required.
- Due to a large area of services and back of house areas for different uses, the usable part of the ground level is a small portion of the site area.

- It is recommended that the service areas are consolidated and/or concentrated on the basement level as much as possible to free up the ground level floorplate to provide opportunities for retail /active uses.
- Further design analysis is required to demonstrate the relationship with the heritage item to the west. How the proposed design relates to/responds to the 2-storey heritage building?

Environmental Impact

- The development proposes a full glass façade which wraps around the building. The level of sun protection for internal spaces particularly on the western façade for the residential component is questionable.

Unit Sizes and Amenity

- The plans appear to show dual-key 2 bedroom apartments which are fully separated through internal walls. The proposed total area for each component is less than 50sqm recommend by the AGD for one-bedroom units (i.e. units 2 & 3 in each level) and less than a minimum requirement for studio (i.e. Unit 1B, 3B). It is expected that each unit will comply with the minimum standards.
- Balconies (i.e. 02B) do not meet the minimum requirement as per the ADG 4E-1.
- Clarification required to demonstrate if each balcony meets the minimum depth required as per the ADG 4E-1.

Engineering Comments

Stormwater Management

- The stormwater management and sediment control plans shall be designed and prepared by suitably qualified Hydraulic/ Civil engineer in accordance with Council's Stormwater Management Code to Council's satisfaction.

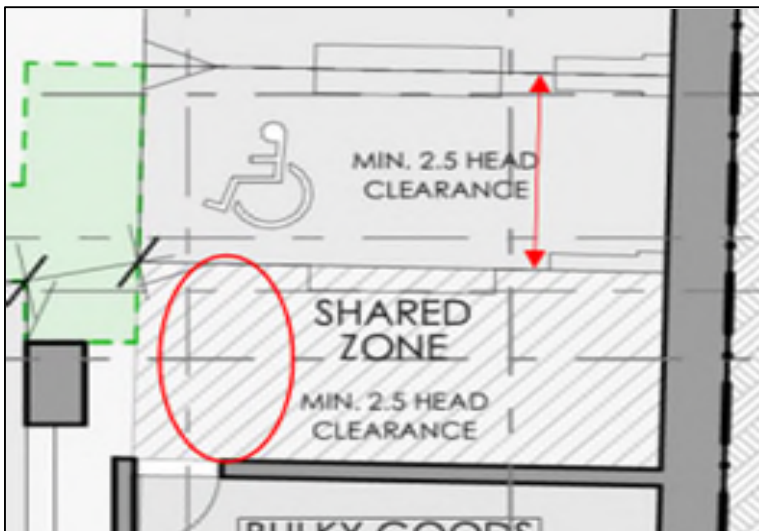
Public Domain Improvement

- The applicant shall provide a high quality Public Domain and Streetscape Improvement elements and finishes on all publicly accessible areas at the property frontages on Railway Parade and Burleigh Street in accordance with Council's DCP & Public Works Element Manual. In this regard a detailed 'Public Domain Plan' is required.

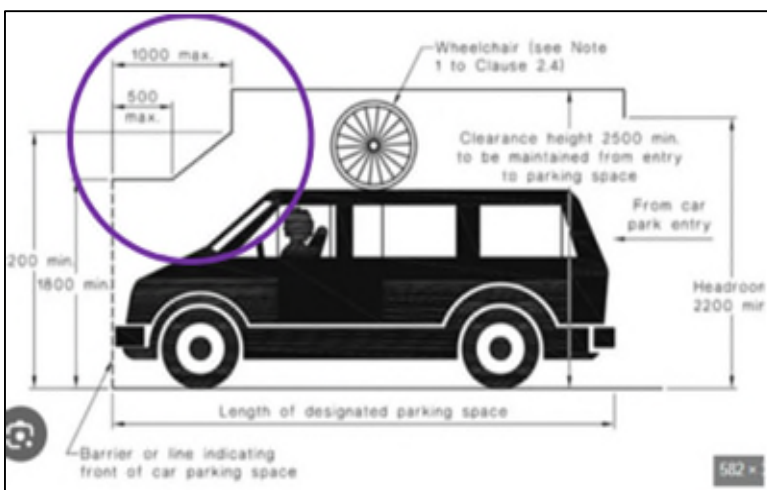
Building Comments

Accessibility

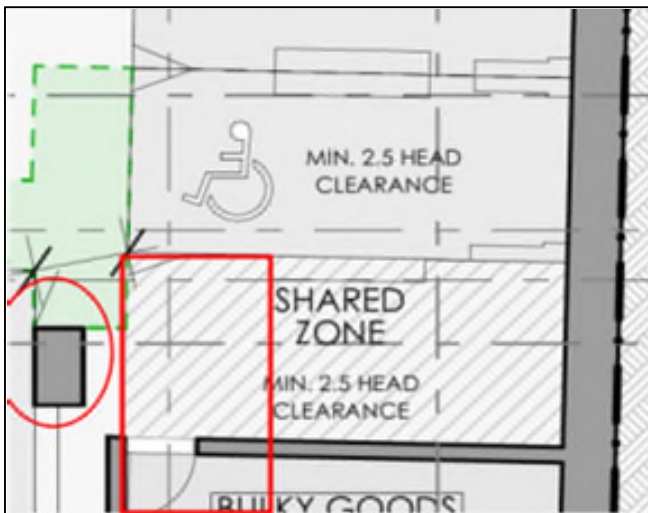
Design drawings SK08 P24, SK09 P24 and SK10 P24 do not show bollards in the shared space adjoining the accessible parking (allocated) space. In addition, dimensions are not shown for the accessible parking spaces (across all basement levels).



On drawing SK10 P24, there appears to be a substation pit above the accessible parking space. Recommendation for services designer/engineer to consider relocation of this pit. Otherwise, the construction of this space must be in accordance with AS2890.6-2022 – car parking spaces for disabilities

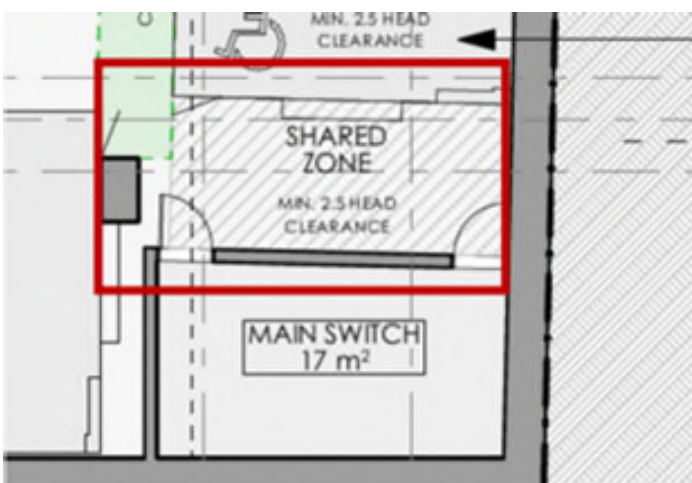


The construction of shared spaces must be designed to ensure that there are no impediments or encroachments into the shared spaces. The location of bulky goods and doorways leading into shared spaces can create unintended obstructions for the user of the accessible parking space. There is further obstruction from the location of support pillars (assumed).



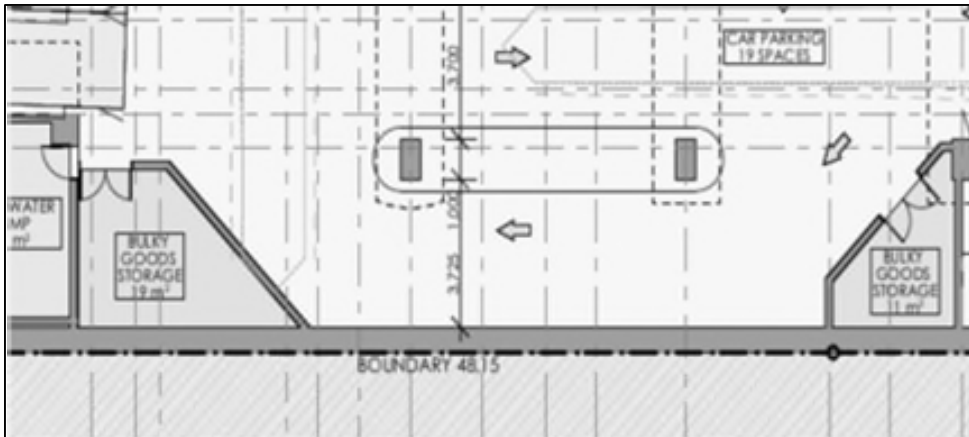
In the above screenshot (western end of basement), there is only 1.021m of clearance between the edge of accessible parking space and the edge of adjoining parking space. The length of space and parking angle meant that a big utility vehicle, as is now common in Australia, will not only reduce the 1.02m clearance, and make it difficult to exit shared zone if there is concurrent access to bulky goods storage.

Basement 1-shared space for accessible parking space (eastern end of basement) is adjacent to a main switch room with two outward opening doors. It would be difficult to utilise this space with the first door being an additional obstruction in close proximity to a support pillar



Recommendation: Reconsider locations of all bulky goods storage. Reconsider the siting of

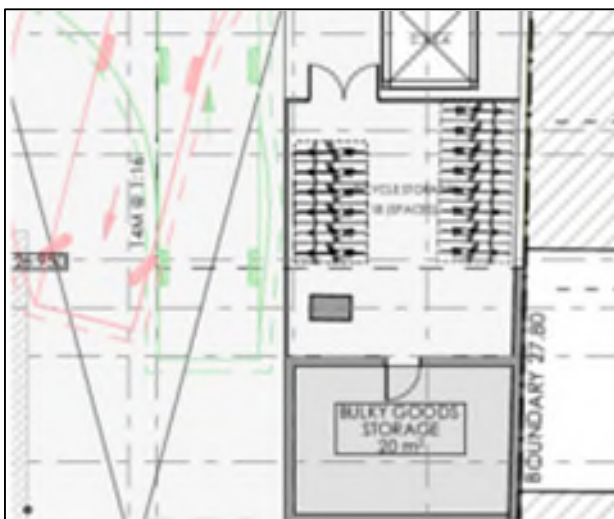
doorways to each storage and review the actual door width. The door widths are not compatible with the bulky goods storage – refer to Basement 1 drawing SK10 P24 (below) with double doors exceeding 850mm.



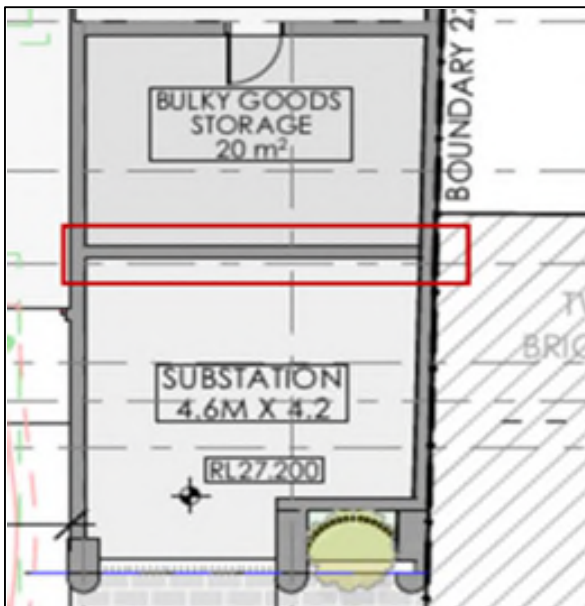
There are other accessibility matters for assessment by the certifier, including but not limited to path of travel accessibility, TGSI – tactile, hearing loop installation, Braille signs and accessibility, ramps, luminance contrast of building surfaces throughout the building, location of adult changing rooms – public if required.

Ground Floor

Ground floor level consists of residential access lobby, hotel and commercial offices lobby and supposedly a café (cannot identify location of café from drawing SK11 P24). Certifier to consider appropriate classification of each part of the building, and to make an assessment under NCC 2022 on fire safety.

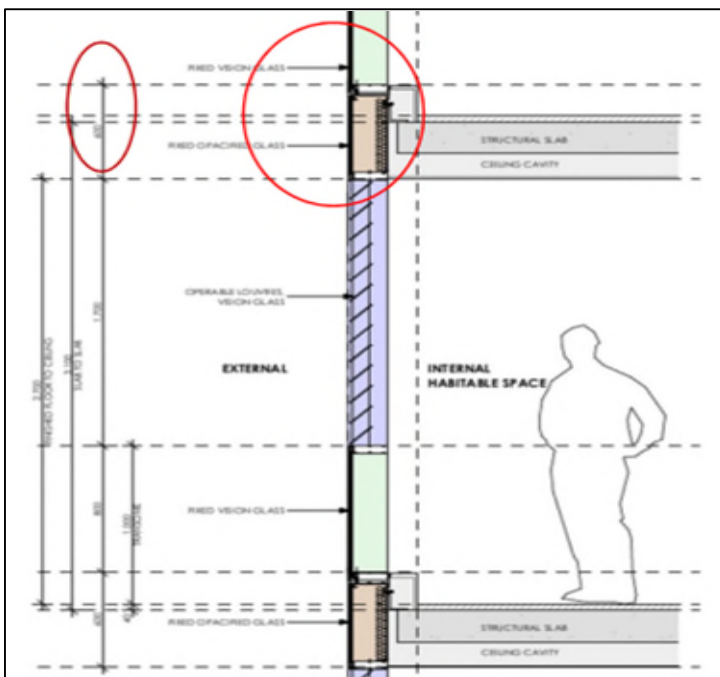


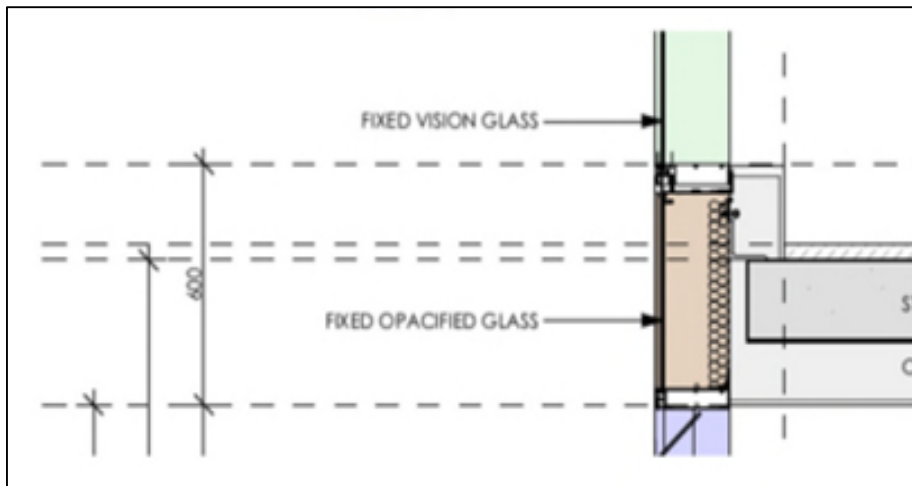
Fire separation for consideration by the certifier – wall between bulk goods storage and the substation. The bulky goods storage (depending on management of access) may contain hazardous goods such as a portable BBQ.



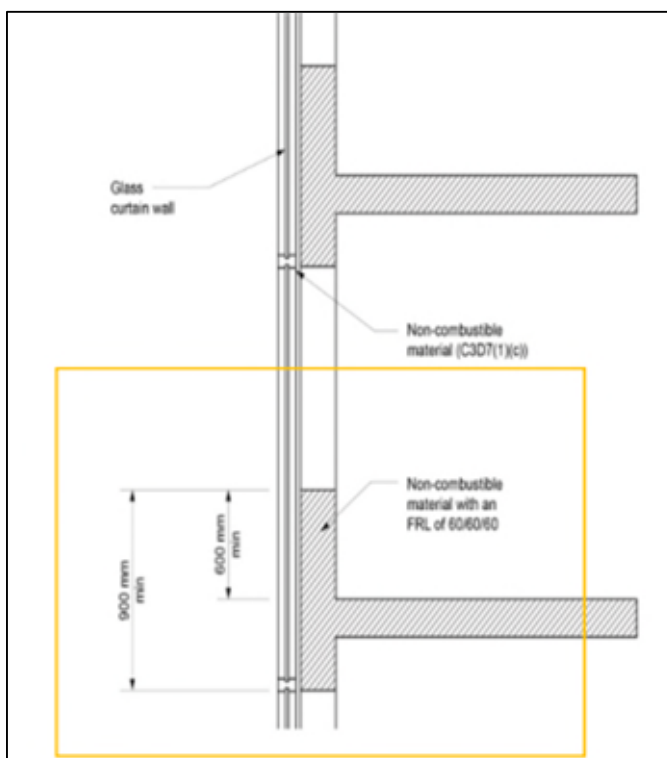
Fire Separation Between Floor Levels

Notwithstanding Council's concerns with glazed façade, inadequate design details for curtain walls are shown.

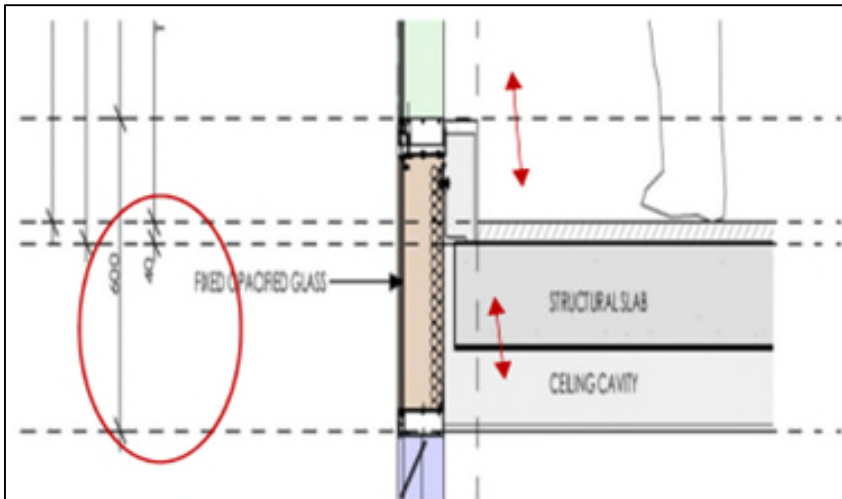




Minimum design considerations as per NCC 2022 Volume 1 for the application of spandrels, or curtain walls that are utilized for this proposed development.



Separation of external window openings to prevent spread of fire between levels must cover 900mm, with 600mm at minimum from the edge of floor above. Red arrows are critical information gaps where it is unknown how this curtain wall design will achieve compliance, or a performance solution warranted for the proposal.



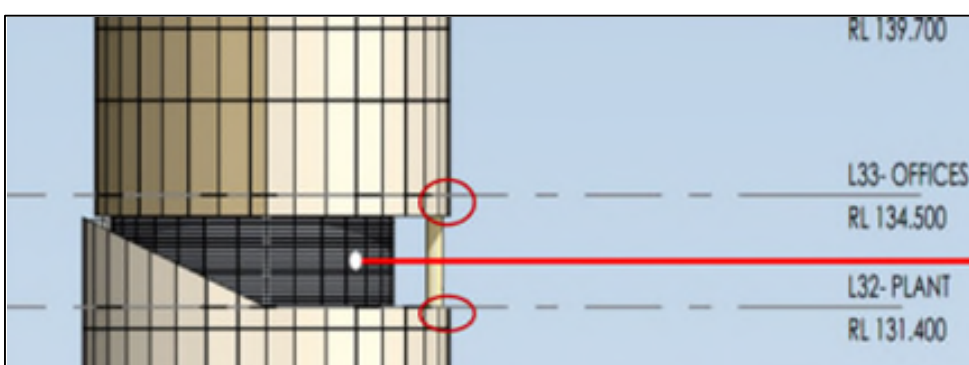
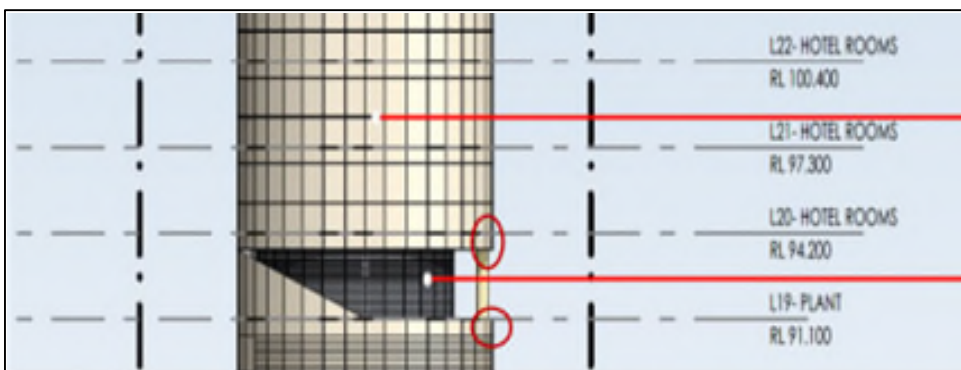
The transome is 1000mm, and fixed vision glass is 800mm. Subtracting the fixed vision glass from transom leaves 200mm. **200mm of opacified glass, fixings and 40mm of flooring meant that the curtain wall construction has vertical protection (assumed) to 240mm.**

This meant 360mm of the minimum 600mm vertical protection is non-compliant.

There is no detail whether the material behind fixed opaque glass is non-combustible, including the structural slab and extent of fire resistance for those materials shown.

Plant Rooms and Level 19 and Level 32

Design details for separation between levels are not included specific to spread of fire to the hotel or offices parts of building. Generally, a spandrel would be required at the top and bottom edges of both Level 19 and Level 32 plant. Or a curtain wall construction as designed for this proposed development.



Consideration is required for fire separation and management of hazards arising from entire floor level used for plant / utilities prior to issuing construction certificate.

NCC Class 9b parts of proposed building

Level 1 has two function rooms that are Class 9b. There is also a pre function space at 71m² and an outdoor space.

Level 2 has a space for hotel gymnasium – Class 9b.

Level 36 to Level 37 can be classified as 9b considering the adaptability of floor layouts to accommodate functions/events. Both levels do have the Class 6 parts – restaurant and food bar.

Level 38 is a Class 9b part of residential component of the building. It included a pool and open spaces for residents to share similar to private open spaces. Consideration to NCC 2022 Volume 1 Part G6 Occupiable outdoor areas is a requirement for the design team to provide details for the certifier.

EV Charging and EV related storage/uses

EV vehicles including electrical bicycles, scooters and other appliances may occupy spaces within the proposed development. Any proposal should comply with NCC 2022 Volume 1 E1D17 and E2D21.

There is no documented details on managing EV including but not limited to charging of EV batteries, mitigating fire hazards from EV charging and managing fires resulting from EV.

This would include end-of-trip EV charging for hotel clients. Majority of hotels in Sydney are installing EV charge stations.

No charging of e-bicycles or e scooters inside apartments, or bicycle storage space at ground level. Fire suppression mitigation infrastructure in the bicycle storage space is required prior to any use of space to charge e-bicycles.

Reference to the practice note by Fire and Rescue NSW on EVs as special hazards in a building.

https://www.afac.com.au/docs/default-source/doctrine/afac_evsin-built-environment_2024-01-09_v1-5.pdf

[https://www.fire.nsw.gov.au/gallery/files/pdf/bfs/Position%20statement%20summary%20-%20Electric%20vehicles%20\(EV\)%20and%20EV%20charging](https://www.fire.nsw.gov.au/gallery/files/pdf/bfs/Position%20statement%20summary%20-%20Electric%20vehicles%20(EV)%20and%20EV%20charging)

Conclusion

Burwood Council has completed its preliminary assessment of the proposed State Significant Development Application (SSDA). The assessment has identified a number of significant issues requiring resolution and as such is formally objecting to the proposal.

In particular, Council is concerned that the proposed design does not demonstrate an adequate level of integration with the surrounding urban context. The development appears to have been designed in isolation, lacking a cohesive relationship with the character, scale, and function of adjacent sites. Furthermore, the proposal does not meet the minimum design excellence standards set out in the Burwood Local Environmental Plan 2012 and raises concerns regarding potential adverse impacts on the surrounding built environment and road network.

The above identified matters relate only to a preliminary review of the proposal within the limited timeframe provided. The comments provided do not represent a full review of all potential impacts of the proposal on the site and the surrounding community. Following the submission of additional information further issues may be identified.

Regards

A handwritten signature in black ink, appearing to read 'Jai Reid', with a stylized flourish at the end.

Jai Reid
Manager City Development

If you require information in other languages contact the Telephone Interpreter Service directly on 131 450 (free service) and ask them to call Burwood Council on 9911 9911 on your behalf.

ARABIC

إذا كنت بحاجة إلى معلومات بلغات أخرى، اتصل بخدمة الترجمة الشفهية عبر الهاتف على الرقم 131 450 (خدمة مجانية) واطلب منهم الاتصال بالنيابة عنك بمجلس بيروود على الرقم 9911 9911.

CANTONESE

如果您需要以其他語言瞭解信息，請致電131 450聯繫電話傳譯服務中心（免費服務），並請他們代您致電9911 9911聯繫Burwood市議會。

GREEK

Εάν χρειάζεστε πληροφορίες σε άλλες γλώσσες επικοινωνήστε με την Υπηρεσία Μετάφρασης και Διερμηνείας στο 131 450 (δωρεάν υπηρεσία) και ζητήστε τους να καλέσουν εκ μέρους σας το Δήμο Burwood στο 9911 9911.

HINDI

यदि आपको अन्य भाषाओं में जानकारी की आवश्यकता है, तो सीधे 131 450 (निःशुल्क सेवा) पर टेलीफोन दुभाषिया सेवा से संपर्क करें और उनसे बरवुड काउंसिल को 9911 9911 पर आपकी ओर से कॉल करने के लिए निवेदन करें।

ITALIAN

Se avete bisogno di informazioni in altre lingue contattate il servizio di interpretariato telefonico direttamente al numero 131 450 (servizio gratuito) e chiedete loro di chiamare il Burwood Council al numero 9911 9911 per conto vostro.

KOREAN

다른 언어로 정보가 필요하시면 전화통역서비스(Telephone Interpreter Service)에 바로 연락하셔서(131 450번, 무료) 귀하를 대신해 버우드 카운슬(9911 9911번)로 전화를 걸어 달라고 요청하십시오.

MANDARIN

如果您需要以其他语言了解信息，请致电131 450联系电话传译服务中心（免费服务），并请他们代您致电9911 9911联系Burwood市议会。

NEPALI

अरू भाषामा यहाँलाई जानकारी आवश्यक भएमा 131 450 (निःशुल्क सेवा) मा सिधै टेलिफोन दोभाषे सेवामा सम्पर्क गर्नुहोस् र आफ्नो तर्फबाट 9911 9911 मा बर्नवुड काउन्सिलमा सम्पर्क गर्नका लागि उनीहरूलाई भन्नुहोस्।

VIETNAMESE

Nếu quý vị cần thông tin bằng các ngôn ngữ khác xin liên lạc trực tiếp với Dịch vụ Thông dịch qua Điện thoại qua số 131 450 (dịch vụ miễn phí) và nhờ họ thay quý vị gọi cho Hội đồng Thành phố Burwood qua số 9911 9911.