

BRIEFING NOTE

To:	All Councillors
From:	Simone Plummer, Director Planning
Date:	24 July 2026
Subject:	Development Assessment Update - State Significant Developments

Dear Councillors,

Council has been notified of several State Significant Development applications that have been placed on public exhibition for comment. Council has prepared submissions in response to each of the applications identified below.

Newington College Redevelopment (Concept and Stage 1) - 200-244 and 221-235 Stanmore Road, Stanmore (SSD-78268465)

Application link: [Newington College Redevelopment project page](#)

Description of proposal

Concept Proposal for the provision of new and upgraded facilities, including:

- Building envelope for the redevelopment of Sevington Courts to accommodate recreational facilities and teaching spaces (refer to detailed Stage 1 Works below).
- Building envelope for alterations and additions to Centenary Hall and development of an adjoining, four storey teaching and learning facility (College Lane building). This development will accommodate a cafeteria and dining hall, lecture theatre, multi-purpose teaching spaces and additional pastoral spaces.
- Building envelope for the redevelopment of the Concordia building to accommodate a performance theatre, multi-purpose gallery and exam centre, new teaching spaces and basement car parking. The Concordia redevelopment includes a new pedestrian bridge across Stanmore Road to the main campus.
- Landscaping design strategy across the campus.
- Car parking provision and circulation arrangements.
- Increase of 368 students and 45 full-time equivalent (FTE) staff.

Detailed Stage 1 Works, including:

- Earthworks and the associated demolition of Sevington Courts.
- Construction, fit-out and operation of 3 storey building comprising multi-purpose indoor and rooftop courts, fitness centre, multi-purpose teaching spaces, amenities and basement car parking.
- Construction, fit-out and operation of 4 storey building comprising multi-purpose teaching spaces, administrative functions and amenities.
- Alterations to the existing driveway within the site to facilitate vehicle access to the new basement car park.
- Temporary car park during construction phase of Stage 1 Works.
- Tree removal and new landscaping adjacent to the Stage 1 development site. Increase of 368 students and 45 FTE staff.

The detailed design and construction of the future stages of the Concept Proposal will be subject to future detailed approval (as part of subsequent detailed development applications). The application was on exhibition from 16 June until 13 July 2026. Council officers' have prepared a submission in response which is *Attachment 1*.

52-54 Pyrmont Bridge Road, Annandale (SSD-125914490)

Application link: [52-54 Pyrmont Bridge Road, Annandale project page](#)

The proposal is currently at the Secretary's Environmental Assessment Requirements (SEARs) stage. This is an early step in the State Significant Development assessment process, where the key matters to be addressed in the Environmental Impact Statement are identified before an application is formally lodged.

The proposal will entail a combined development application and concurrent rezoning. At this stage, the documentation available only includes very concept envelope diagrams. Once the formal application is lodged Council will have an opportunity to provide further comments and the application will be publicly notified. The development is described as follows:

Description of proposal

- Partial, adaptive re-use of the existing heritage façade
- Demolition of other non-related structures on site
- Provision of a non-residential podium including provision of public domain spaces indicated to comprise a piazza, through site link, supermarket, retail tenancies, health and wellness precinct and commercial tenancies
- Construction of 3 x 22-storey towers above the podium including the provision of BTR apartments including 15% of dwellings as affordable for 15 years

Description of concurrent rezoning proposal –

Amend the Inner West Local Environmental Plan (2022) SEPP to:

- Permit a maximum height of building up to 85m.
- Permit a maximum floor space ratio (FSR) up to 7:1

Council officers provided a submission in response which is included as *Attachment 2*.

Kogarah Golf Club Redevelopment - Concept & Stage 1 Works (84467726). 13-19 Marsh Street, Arncliffe

Application link: [Kogarah Golf Club Redevelopment project page](#)

The Site is situated within the Bayside Local Government Area to the immediate west of the Cooks River and Sydney Airport. The image below indicates the site location.



This State Significant Development Application seeks consent for two (2) separate components, comprising:



- Concept Masterplan – Establishment of key parameters to inform separate future Detailed Development Applications for development, including maximum building envelopes, gross floor area, land uses and other parameters; and
- Early Works – Carrying out of initial site preparation and infrastructure works required to support future development and publicly accessible open space.

The application seeks a combined development application and concurrent rezoning.

The application was on exhibition from 10 June until 7 July 2026. Council officers' have prepared a submission in response, which seeks a more detailed traffic management plan. The submission is *Attachment 3*.

All applications can be found on the Department's Major Project Website - [Major Projects search | Planning Portal - Department of Planning and Environment](#).

Should you require any further information on the above, please let me know.

Simone Plummer
Director Planning

Attachments:

1. Council officers' submission – Newington College Redevelopment
2. Council officers' submission – 52-54 Pymont Bridge Road, Annandale
3. Council officers' submission - Kogarah Golf Club Redevelopment



Internal Ref: EXTERNAL/2024/0023

7 July 2026

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

ATTENTION: Ingrid Zhu

Dear Ms Zhu,

**Inner West Council Response: SSD-78268465 – Newington College Redevelopment
(Concept and Stage 1)**

Property: 200-244 Stanmore Road and 221-235 Stanmore Road, Stanmore

Thank you for the opportunity to review and comment on the application for the Newington College Redevelopment (Concept and Stage 1) State Significant Development Application (SSDA).

This letter documents the views of Council officers, not of the elected representatives.

Council is supportive of the school's intention to deliver improved facilities for students, staff and the broader school community. Notwithstanding this support, several aspects of the proposal would benefit from further clarification and/or review, as detailed in Attachment A and summarised below:

- Statutory Context
- Design Quality/Built Form and Urban Design / Visual Impact
- Environmental Amenities
- Trees and Landscaping
- Traffic, Transport and Accessibility
- Noise and Vibration
- Stormwater and Wastewater
- Flooding Risk
- Contamination and Remediation
- Waste Management
- Environmental Heritage
- Contributions and Public Benefit

For ease of reference and where possible, the comments in Attachment A are aligned with the key issue and assessment requirements headings in the issued SEARs.

Once again, thank you for the opportunity to provide further comment on the subject proposal.



If you need any further information in relation to the above response, please contact Council's Team Leader, Development Assessment, Kaitlin Zieme on (02) 9392 5379 or email kaitlin.zieme@innerwest.nsw.gov.au.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Ruba Osman". The signature is stylized and cursive.

Ruba Osman

Senior Manager –Development Assessment (Acting)

Enclosed

Attachment A: Consolidated Inner West Council Officer comments



Attachment A - Consolidated Inner West Council Officer comments SSD-78268465 – Newington College Redevelopment (Concept and Stage 1)

Issues and Assessment Requirements

1. Statutory Context

Concept Proposal

The Environmental Impact Statement (EIS) submitted with the application advises that the only DA approvals of relevance to the SSDA are DA201400370 (approved 19 December 2014) and DA201100141 (approved 18 July 2011). The EIS states in relation to DA201400370 that “The Applicant accepts a condition of consent that requires DA201400370 to be modified in accordance with Section 4.17 of the EP&A Act”. Council seeks confirmation of activation of approval and the conditions which the applicant seeks to have overridden or modified as a result of the proposal.

The subject site has also had a number of other applications approved, such as DA201400369. Council requests clarification on whether these other consents have lapsed. If such consents are active, Council also requests further clarification on the relationship between these consents and the proposed works.

To assist in understanding the cumulative impacts especially to Stanmore Road, Council requests a plan identifying all approved works including unconstructed works or works capable of being carried out under existing consents, to demonstrate the full extent of development that may ultimately occur on the site.

2. Design Quality / Built Form and Urban Design / Visual Impact

Concept - Concordia Building (stage 6)

Further detail and refinement are required to demonstrate that the proposed building envelope and massing of the Concordia building presents as an appropriate design response to the site and its context, including the following:

- a) The concept plans do not adequately present the surrounding context, including site topography, the curvature of Stanmore Road and the presentation of adjoining development. For example, No. 237 Stanmore Road appears to be depicted as a two-and-a-half storey building despite presenting as a single-storey dwelling from the street.
- b) Demonstration that the proposed front setback is consistent with, and responds appropriately to, the established streetscape character of Stanmore Road.
- c) Further refinement of the Stanmore Road pedestrian entry to provide a more inviting and legible arrival experience, including consideration of potential safety and amenity impacts associated with congregation at the Stanmore Road frontage, including the potential for patrons or students to spill onto the footpath and road after events.

- d) Further consideration of the bridge lift design to ensure it is more clearly integrated into the public domain, highly visible and legible as a public facility. In this regard, it is recommended the entry is located closer to the public domain.
- e) Additional context plans, sections and visualisations showing the existing built form and surrounding properties to enable assessment of additional impacts arising from the proposal, particularly in regard to the rear and side setback and massing which adjoins residential properties. Such information should demonstrate that the proposed development will not result in unreasonable additional impacts in terms of visual bulk, outlook, views or amenity when compared with the existing situation.
- f) Further refinement of the proposed scale and massing, having regard to the prevailing two storey character of development along the street and amenity impacts. Particular consideration should also be given to the building edges and interfaces with neighbouring residential land to ensure an appropriate built form transition.
- g) Confirmation is requested as to whether the existing telecommunications tower will be retained or removed as part of the proposed redevelopment.

Stage 1 - Sevington Building

Further detail and refinement is required to demonstrate that the proposed detailed design of the Sevington Building represents an appropriate design response to the site and its context, including:

- a) Further refinement of the school's interface with Stanmore Road is required to better integrate with the surrounding streetscape and neighbourhood context. In particular, the northern and eastern elevation of the Sevington Building, which forms the primary façade to Stanmore Road, contains extensive blank wall areas. Given the building will be highly visible from the public domain and read in the round, all visible elevations require further design development to provide a more engaging and welcoming street presence. Greater visual permeability, activation and architectural articulation are required to improve the building's relationship with Stanmore Road and the surrounding public domain, particularly at a pedestrian level.
- b) The submitted materials and finishes schedule does not provide sufficient detail or consistency to confirm the intended final materiality of the building. In particular, discrepancies have been identified between the material schedule, material swatches, architectural elevations and visual representations. This includes the nomination of '03 Terracotta Cladding' to the lower levels and '04 Profiled Aluminium' to the upper level of the Sevington Building, which do not appear to align with the corresponding swatches or are represented inconsistently across the submitted documentation (images below showing three different finishes). Further clarification is required regarding the proposed materials, colours and finishes, including the provision of more realistic swatches and clear differentiation between alternative colour schemes (eg. 05a 05b to distinguish brown or green versions with the specific colour nominated). The cream colour on the corners of the north elevations is not annotated with a material or finish. The materials schedule should be referenced on the corresponding elevations to clearly identify the location and extent of each proposed material and finish.
- c) Further clarification is required on the screening structure to the rooftop courts. It is unclear if the materiality is 07 or 11 or a mixture of both. Further, there appears to be

INNER WEST

an angled detail to the corner of the courts which is unclear if it's a brace or chamfered edged or a change in materiality. Consideration should be given to increasing the setback of the screening structure from the Stanmore Road frontage to reduce any perceived visual bulk.

- d) Justification or refinement regarding the height of the roof plant structure on top of the Sevington Building.
- e) Clarification is required regarding the Stage 1 temporary car park and the proposed restoration of the site following completion of Stage 1. In particular, insufficient information has been provided to demonstrate what mechanisms are to be relied upon to ensure the temporary car park will be removed and the tennis courts and landscaping reinstated. Nor have any drawings been provided showing what the reinstated courts, fencing and landscaping will look like. A restoration plan and associated drawings is requested to confirm the final site layout and that a condition is imposed requiring all temporary works (such as the carpark) be removed prior to the occupation of the Sevington Building.



North elevation dwg 01-3101 rev 4 (page 14 of Appendix C Architectural Plans - Stage 1 - Part 1)



Viewpoint 05 photomontage (page 30 of Appendix W Visual Impact Assessment)



View from Stanmore Road (page 30 of Appendix M Architectural Design Report - Part 4)

3. Environmental Amenity

Concept - Concordia Building (stage 6)

It is noted that the EIS includes 9am and 3pm winter solstice shadow diagrams of the proposed Concordia building and states that hourly shadow diagrams are provided in Appendix M. However, the hourly shadow diagrams for the Concordia building cannot be located, only the shadow studies for the Sevington and College Lane buildings. Further, the shadow diagrams do not appear to accurately represent the built forms at 215-219 Stanmore Road (with no. 219 not shown at all) and do not include shadows from neighbouring properties, particularly of concern from 22 Holt Street. Amended shadow diagrams are imperative to understand the cumulative impacts to 215-219 Stanmore Road and the acceptability of the Concordia Building envelope under the concept proposal.

4. Trees and Landscaping

Stage 1 - Sevington Building

Further detail is required to demonstrate that tree retention and canopy objectives are achievable in practice and over the long term. The following comments are provided regarding tree management are to be addressed:

- a) The current documentation does not clearly demonstrate how the fig trees within the Sevington forecourt will be protected in a real-world construction scenario. In particular, inconsistencies remain between the arboricultural, civil, landscape and architectural documentation regarding TPZ and SRZ requirements, and insufficient detail has been provided regarding construction methodologies within or adjacent to root protection areas. Further justification is also required to demonstrate that the proposed forecourt design, including hardstand areas, services and pedestrian activity, will not adversely affect the health and longevity of the trees. As submitted, the long-term retention of the fig trees has not been satisfactorily demonstrated.

- b) Further information is requested demonstrating that the location of the Stage 1 Substation/Electrical kiosk behind Parsonage Building has been fully considered and results in acceptable impacts. Specifically:
 - Associated service trenching has the potential to introduce further disturbance within planting areas and root zones
 - There is no clear indication that cable routing has been aligned with hard infrastructure to avoid impacts to tree planting zones
 - The implications of these works for long-term tree establishment and viability
- c) Further information is requested demonstrating how the proposed construction methodology can be practically implemented while ensuring the long-term retention of existing and proposed trees. Insufficient information has been provided regarding the accommodation of large plant and equipment, including cranes, the movement of demolition and delivery vehicles, and the location of temporary loading, laydown and site establishment areas within a constrained site environment. In particular, it has not been demonstrated how these activities can occur without encroaching into Tree Protection Zones, deep soil areas or planting zones, or otherwise compromising tree retention and establishment objectives. Further arboricultural input is required to demonstrate that construction access, equipment movement, material storage and tree protection measures can be effectively integrated into the Construction Management Plan and maintained throughout all stages of construction.
- d) Further information is requested demonstrating that the cumulative impacts of pruning, root loss, excavation, remediation, service installation and construction activities can be accommodated without adversely affecting the long-term health and viability of retained trees. While the proposed pruning and root impacts may be acceptable in isolation, insufficient information has been provided regarding the extent and location of proposed pruning works, the specific branches affected, and whether alternative construction methodologies have been considered to minimise impacts.
- e) Regarding the Stage 1 temporary car park, Council does not typically support the removal of street trees for temporary vehicle access. However, support may be considered where the proposed tree removal forms part of a broader public domain outcome, including the undergrounding of existing overhead electrical infrastructure on Stanmore Road to facilitate the planting and long-term establishment of larger replacement street trees and an improved tree canopy outcome. Further consideration should be given to locating the vehicular entry and exit point at the same location approved under the 2014 consent to minimise unnecessary tree removal and impacts on existing vegetation.
- f) Further information is requested demonstrating that the proposed planting strategy is capable of achieving the intended canopy outcomes. In particular, clarification is needed to distinguish between genuine deep soil and on-structure planting, including the available soil volumes, depths and continuity for individual trees. Further detail should also confirm which trees are located within true deep soil areas and demonstrate that the proposed soil conditions can support the anticipated canopy growth and long-term viability of the planting scheme.
- g) Further information is requested demonstrating that arboricultural considerations have been appropriately integrated into the Remediation Action Plan (RAP) and associated civil design. In particular, insufficient information has been provided regarding the impacts of excavation and soil remediation works within Tree Protection Zones, the potential loss or degradation of viable root zones, and the implications of proposed



service infrastructure on retained trees. Further arboricultural input is required to inform the RAP and civil documentation, and to demonstrate that excavation, remediation and service installation works can be undertaken without compromising the long-term health and retention of existing trees.

- h) Further information is requested demonstrating that tree protection measures have been appropriately coordinated with the construction and operational requirements of the site. In particular, inconsistencies have been identified between the Tree Protection Plan, Construction Waste Management Plan and Operational Waste Management Plan regarding vehicle access and manoeuvring, waste handling, and material storage areas. Further information is required to demonstrate that these functions can be accommodated without encroaching into TPZs, deep soil areas or proposed planting zones. Additional arboricultural review and coordination is recommended to confirm that tree protection measures can be appropriately implemented throughout construction and operation, and that site activities will not adversely affect the long-term health, establishment and retention of existing and proposed trees.
- i) The submitted documentation positively indicates an intention to achieve no net loss of tree canopy over the long term. However, further information is required to clearly demonstrate how the proposed canopy outcomes will be achieved. In particular, additional detail regarding canopy replacement calculations, a comparison of existing and proposed canopy cover, species selection, and planting stock is requested. This should include consideration of 400L stock sizes and larger advanced trees where appropriate to support the establishment of tree canopy across the site.

5. Traffic, Transport and Accessibility

Concept - Pedestrian Bridge (Stage 6)

Council requests that the following recommendations are secured by conditions of consent:

- a) The bridge being open to the public on a 24/7 basis and including a lift on each side connecting to the public footpath to enable safe and equitable use.
- b) Newington College must be responsible for all care and maintenance of the bridge, lifts, lighting, finishes and associated infrastructure, including maintenance obligations must include graffiti removal, dumped items, cleaning, painting, lighting, lift maintenance and repairs.
- c) No advertising, school branding, naming rights, banners, logos or promotional signage should be permitted on the bridge. Only road-safety or wayfinding signage approved by Council and/or TfNSW may be allowed.
- d) The existing pedestrian bridge structure should be upgraded to include pedestrian safety fencing.
- e) The applicant to enter into an airspace lease with Council for the bridge in accordance with Council's Land and Property Policy.

Please note: No pedestrian fencing is supported on the Stanmore Road footpath as part of the bridge works. If access-control treatment is later required, verge planting may be considered.



Concept - Concordia Building Vehicular Access (stage 6)

Council supports the proposed vehicular access arrangement, being entry from Cavendish Street and left-turn-only exit to Stanmore Road. However, it is acknowledged that this arrangement relies on TfNSW approval for the Stanmore Road left-out exit.

Should TfNSW not approve the Stanmore Road left-out exit, Council does not support the proposed basement carparking consisting of 60 spaces in the Concordia stage of the redevelopment. In that circumstance, all vehicle access and exiting would be required via Cavendish Street, resulting in unacceptable impacts associated with the narrow access handle, increased traffic on the local road network, proximity to nearby schools, and pedestrian safety concerns.

Stage 1 - Traffic and Parking Including Temporary Carpark

The results of the on-street parking occupancy surveys given in S8.9 of the Transport & Accessibility Impact Assessment report (dated April 2026) indicate relatively high on-street parking occupancy rates for the streets surveyed. Unfortunately, the surveys tendered to only survey the northern side of the 400m radius requested.

It is appropriate that further extended surveys are undertaken from 7:00am to 8:00pm on a typical Wednesday and Thursday and between 8:00am to 5:00pm Saturday (outside school holiday periods) of all surrounding streets of a 400-metre radius. Survey data is to include a street-by-street detailed inventory of spaces.

Streets to be included are as those surveyed and the following: Marshall Street, Denning Street, William Street, Bright Street, North Street, Middle Street, East Street, England Avenue, Agar Street, Wemyss Street, Harrington Street and Newington Street (between William Street and Middleton Road and between Browns Avenue and Wemyss Street).

Notwithstanding the above additional information, Council requests that the following recommendations are secured by conditions of consent:

- a) A Green Travel Plan is to include reporting progress on targets to Council and corrective actions should be required if targets are not met.
- b) An updated Operational Traffic and Parking Management Plan, including drop-off/pick-up management, event parking, bus operations, waste/servicing times, monitoring, complaint response, corrective actions and reporting to Council.
- c) The temporary staff car park is acceptable only as a temporary construction measure. The temporary access/driveway must be removed when no longer required, with kerb, gutter, footpath and landscaping reinstated.

6. Noise and Vibration

Stage 1 - Sevington Building

The following comments are provided regarding acoustic impacts are to be addressed:

- a) The consultant establishes criteria for noise emissions from Stage 1 (i.e. use of the sporting facilities of Sevington Court). The selected criteria require that the LAeq noise level from use of the facility must not exceed background + 10 during the daytime and evening (7am to 6pm, and 6pm to 10pm) and background + 5 for morning shoulder (6am to 7am). The consultant has drawn the criteria from the old (superseded) EPA Noise Control Manual, which provided guidance that sporting events could be permitted to run past 6pm if they do not exceed the background level by more than 5 dB for new events, and 10dB for existing events. However, the manual also says in the part preceding this that noise control “*usually is most equitably and effectively achieved by regulation of the frequency and duration of events*”. The proposal for the use of the Sevington Court facility is for use every day of the week, throughout the year, and will include both sporting events as well as all-school assemblies and functions. This is different from existing sporting events that might occur occasionally and just want to run later into the evening, where a higher criteria might be considered reasonable given the exposure to the noise is less frequent. This criteria also doesn't reflect the current proposal for the facility to house functions and all school assemblies, in addition to sport events. As such, a background + 10 criteria is considered inappropriate in this situation. A background + 5 limit is considered to be more appropriate, in reflection of the frequency and duration of the noise that the existing receivers will be exposed to in this case.
- b) The concept proposal involves an increase in student numbers associated with the school. The acoustic report does not appear to include any consideration of the noise impact of this increase on existing receivers near the school, though it is certainly possible the increase will have a negligible impact on overall noise levels. Nonetheless, a statement regarding the impact of increased student numbers should be included in the report.
- c) In addition to the detailed Stage 1 proposal, the concept proposal also involves alterations and additions to Centenary Hall and an additional teaching building, as well as development of the Concordia building to accommodate a performance theatre, multi-purpose gallery and exam centre, and new teaching spaces. The submitted Noise and Vibration Impact Assessment has not established overall noise emission criteria for these new/modified teaching and performance spaces that will form part of the proposed future Stages 2 – 6. Rather, the submitted report only seems to establish noise emission criteria for all stages for mechanical plant/equipment. Although it is acknowledged that the specific design of these spaces will be subject to detailed applications at later stages, the acoustic report for the concept plan should at least establish what the cumulative noise emission criteria are for the new school facilities/uses, so that the acoustic assessment for each detailed design stage can be done against this overarching criteria and predictions made at that time as to whether compliance can be achieved. Although some of the spaces (such as the exam centre and gallery) are unlikely to result in adverse noise emission impacts for nearby existing receivers, the teaching spaces and performance theatre (e.g. due to amplified music/voice and audience noise) could result in acoustic impacts. A cumulative criteria should be established in the Noise and Vibration for noise from use of the various proposed performance spaces, teaching spaces, function spaces, and other relevant noise generating uses that comprise Stages 1 – 6 of the concept proposal (other than those already covered by the Noise Policy for Industry criteria). Criteria should be



established at each identified sensitive noise receiver location, and compliance with the criteria should be assessed in the more detailed acoustic assessment for each detailed design stage.

- d) Page 25 of the report explains that noise from the stage 1 Sevington Courts works will be assessment against the long superseded NSW Environmental Noise Control Manual. The sentence explaining this (“These criteria are only relevant to.”) ends mid sentence and as such, clarification is sought on the assessment.

7. Stormwater and Wastewater

Concept – College Lane building (stage 3)

The stormwater strategy is acceptable in principle, subject to the following stormwater management matters being addressed:

- a) Detailed stormwater design is required for the College Lane flood / overland flow mitigation works. Confirmation of blockage factors is required for both inlet capacity and the 1% AEP pipe design of the 2 x 600 mm diameter pipes. As these works drain to a public road, the overland flow mitigation works should be covered by a restriction on title and a positive covenant for maintenance.

Note: A maintenance plan and positive covenant for all OSD tanks and WSUD devices should be secured through conditions of consent to ensure their ongoing operation and maintenance.

8. Flooding Risk

Concept – College Lane building (stage 3)

The flood assessment is generally acceptable; however, the College Lane overland flow and flooding require further detailed flood assessment before the College Lane building envelope proceed, including:

- a) The proposed College Lane pit and pipe system must be confirmed as adequate under blocked conditions. The 1% AEP flood assessment should apply a minimum 50% blockage to the kerb inlet / side-entry pit.
- b) A 50% blockage factor must also be applied to the overflow pipe system (2 x 600 mm diameter pipes).
- c) The assessment should address larger events up to the PMF.
- d) Flood gates, barriers, pits, overflow pipes and related flood mitigation assets, including the College Lane 1% AEP drainage system, require positive covenants and/or restrictions to ensure they are maintained and kept in working order.

9. Contamination and Remediation

Stage 1 - Sevington Building



Overall, the proposed investigation and remediation approach is satisfactory. While a detailed site investigation would ordinarily be preferred prior to determination, it is acknowledged that site access is constrained by the site's ongoing operation as a school.

Council requests that the following recommendations are secured by conditions of consent:

- a) Compliance with the hazardous materials survey findings and appropriate hazardous materials management.
- b) Review of the Remediation Action Plan following completion of the proposed data gap investigations, with any required addendum endorsed by the accredited Site Auditor.
- c) Submission of a Section A Site Audit Statement prior to occupation of each stage of the development.
- d) Implementation and ongoing maintenance of any long-term Environmental Management Plan required following remediation.

10. Waste Management

Stage 1 - Sevington Building

The following comments are provided regarding waste management are to be addressed:

- a) The Operational Waste Management Plan (OWMP) states that waste management is based on the size of the gymnasium, general learning area, and staff room. The NSW EPA in their 2019 "Better practice guide for resource recovery" recommends waste generation for schools be based on the number of students. As such, please ensure that the existing and proposed waste facilities are capable of accommodating the waste generation from the additional 368 students across the entire Newington College redevelopment.

11. Heritage

Stage 1 - Sevington Building

The following comments are provided regarding Heritage and Design are to be addressed:

- a) The modulation to Level 4 of the Sevington Building and the Pavillion Building is to be applied to all levels in the north, east and west elevations so as to be complementary to the modulation of the residential development located in the Kingston South HCA to the northern side of Stanmore Road. Datum lines, including parapets, string courses and window mullions must relate between the 2 buildings and respect the established lines in the streetscape. More flexibility to the detail and treatment may be applied to the southern facades that will overlook the playing field. It is also noted that the material schedule identifies the lower levels as being finished in '03 Terracotta Cladding'; however, this appears inconsistent with the materials depicted on the submitted elevations.
- b) Clarification is required regarding the demolition of the sandstone and brick fences to Stanmore Road. The Detailed Architectural Plans for Stage 1 do not indicate the



proposed demolition of the sandstone and brick fences to Stanmore Road and shows these as retained in the Typical Section drawings. The HIS states “The original sandstone walls along the northern boundary of the site carefully deconstructed and would be reconstructed on the modified alignment, retaining the existing character of the sandstone road interface.” Any proposed change to the alignment of the sandstone and brick fences to Stanmore Road must be shown in the plans.

Concept Proposal

- c) The Concept Plans should be annotated or conditioned to show the retention of the Centenary Hall building name, foundation stone and plaques to front façade and internal memorial boards as part of the works for stage 2. This must occur to retain the significance and understanding of the social significance and history of this building within the site.
- d) The Visual Impact Assessment shows the 4 storey bulk of the Concordia Building will dominate the Stanmore Road streetscape in relation to the existing 2 storey development on the northern side of the road, within the Kingston South HCA. This is also demonstrated in the South Elevation for the Stage 6 proposed envelope drawings. It is recommended that the building envelope be refined to respond to the existing building typology and character in the streetscape. Additional levels of the Concordia Building should step back from Stanmore Road and adjoining 2 storey development to reduce the overall height, bulk and scale.
- e) A Conservation Management Plan has been completed and submitted as part of the proposal. Though an individual assessment has not been prepared for Centenary Hall. The significance of this building is to be considered in part of the overall significance of the site.

12. Contributions and Public Benefit

Stage 1 - Sevington Building - Contributions

The below citation is quoted from a recently approved SSD 82714716 issued by the Department, dated 23 December 2025 (see page 6, Condition A7), Council requests that this condition is replicated if approving this application:

Prior to the commencement of construction, the Applicant must provide written evidence to the Certifier that a monetary contribution pursuant to the provisions of Inner West Local Infrastructure Contributions Plan 2023 (as amended) has been paid to Council. Council must be contacted for calculation of required contributions.

Notwithstanding, it is noted that the net increase in workers, based on the proposed GFA of 7,409sqm, is 78.8 and is to be rounded up to 79. Additionally, the stated worker contribution rate in the EIS has been based on 2021 figures. The current contribution rate (March 2026 quarter) is \$3,910 per worker.

Stage 1 - Sevington Building - Community Benefit

INNER WEST

While the proposed community access arrangements are noted, the information provided does not clearly demonstrate the extent of community use that would be facilitated by the development. In particular, the commitment that facilities will be available for hire “when not in use by the College” is open-ended and may, in practice, result in limited opportunities for community access given the extensive before-school, after-school and weekend use of the campus for sporting and co-curricular activities. Further detail is requested regarding the specific facilities available to the community, the proposed hours and frequency of access, booking arrangements, and any measures to ensure meaningful and ongoing community use of the facilities outside school hours.

Commitments to community benefit should also be included in the concept proposal.





Internal Ref: EXTERNAL/2026/0003

6 July 2026

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

ATTENTION: Matthieu Santoso

Dear Mr Santoso,

Inner West Council Response: SSD-125914490 – 52-54 Pyrmont Bridge Road, Annandale

Council would like to thank the Department of Planning, Housing and Infrastructure (DPHI) for organising a Planning Focus Meeting (PFM) for the proposed mixed-use development at 52-54 Pyrmont Bridge Road, Annandale which includes the construction of 3 mixed use buildings including adaptive re-use of the heritage facade and public domain upgrades.

This advice is made by Council officers, not elected representatives. While Council recognises the urgent need for new housing and the strategic importance of this site, the proposal warrants further review, as outlined in Attachment A and summarised in the points below:

- Strategic context and vision of the precinct
- Master planning and cumulative impact analysis
- Provision of affordable housing
- Impacts on future development and built form outcomes, including site isolation
- Provision of public benefit and public domain activation
- Built form, urban design, and amenity impact justification
- Waste, flooding, traffic, and parking matters

The essence of Council's comments is that the application should not be considered in isolation but within the broader planning context. This includes other State Significant Development applications and the ongoing State-led rezoning of the Parramatta Road Corridor (particularly the Inner West Precinct including Camperdown-Annandale). The absence of precinct-wide master planning restricts both Council's and the Department's ability to assess how the proposed development's, built form, infrastructure and land use will integrate with adjacent sites and the wider renewal area. Particularly in relation to this site, there appears to be a conflict between the proposed development and the Department's long-term vision for this section of Camperdown, including the future



provision of open space and the activation of Chester Street. The applicant is encouraged to consult with the State Led Rezoning team regarding the proposed rezoning to ensure the development is consistent with the Department of Planning's vision for the Camperdown area.

The SSD pathway does not enable rigorous testing of a proposal such as this, given the absence of a masterplan to provide an appropriate framework for development. Therefore, it is recommended that the proposal be deferred until a clear precinct vision and structure plan are in place.

Council also requests, and this was acknowledged by the Applicant, that the proposal undergo a State Design Review Panel process to ensure design excellence, in accordance with Inner West Local Environmental Plan 2022 Clause 6.9. It is also noted that the elected Council has resolved to seek Gateway approval for an amendment to this clause, with the intent of strengthening the provision so that consideration by a design review panel is required to demonstrate design excellence, irrespective of the relevant consent authority.

Once again, thank you to DPHI and the Applicant for the PFM meeting on 22 June 2026 and the opportunity to discuss and comment on the proposal at this early stage. Council acknowledges the opportunity to provide new housing along Parramatta Road to address the current housing emergency.

In the meantime, if you need any further information in relation to the above response, please contact:

Eric Wong

02 9392 5229

eric.wong@innerwest.nsw.gov.au

Gill Dawson

02 9392 5030

gill.dawson@innerwest.nsw.gov.au

A handwritten signature in black ink, appearing to read 'Simone Plummer'.

Yours faithfully,

Simone Plummer

Director Planning Enclosed Attachment A: Consolidated Inner West Council Officer comments

6 July 2026

Attachment A – Consolidated Inner West Council Officer comments SSD-125914490 – 52-54 Pyrmont Bridge Road, Annandale

Site and Strategic Background

This site is now one of four sites located along Pyrmont Bridge Road that has been considered under the SSD pathway by the Housing Delivery Authority (EOI references 238363, 242754, and 244679). This is in addition to the WestConnex Dive Site being developed by Landcom. As each application requires the land to be rezoned from E4 General Industrial or E3 Productivity Support to MUI Mixed Use, it is considered appropriate that the SEARs include matters normally required for a planning proposal, such as the assessment of economic and social impacts.

The Camperdown precinct is transforming from industrial to a high density residential/mixed use precinct. This application along with the others mentioned, must consider the cumulative impact of residential development on the broader area. An overarching structure plan is required to ensure a cohesive and integrated approach is taken for this transformation at the precinct level. To that end the draft masterplan being prepared for the State-led rezoning should inform this proposal to ensure a high quality, liveable and connected neighbourhood is achieved. Given the locality and site context, any proposal should be at the forefront of sustainability and mode shift.

There are several precinct and site-specific matters which should be addressed in the EIS in addition to the housing industry specific SEARS. These are outlined below.

Key matters and Supporting Documentation

1. Strategic Context

Supporting Documentation: Concurrent Rezoning Document

- Proposed changes to the *IWLEP 2022* including land use zoning, FSR, HOB and any additional site-specific local provisions must be identified. The rezoning proposal document should also include the proposed changes to the *IWLEP 2022* maps and clauses.
- Compliance with Local Planning Direction 1.5 Parramatta Road Corridor Urban Transformation Strategy must be identified and a detailed justification for any non-

compliances included, as well as how the proposal will deliver better outcomes than those identified in the strategy.

- In particular, the future EIS should outline how it intends to minimise any net loss of commercial floorspace and employment land, through provisions such as minimum non-residential floorspace on ground floor and upper levels and through appropriate design measures to continue providing continuous supply of employment lands in this Inner West location.
- Whilst it is acknowledged that the site is suitable for some form of housing and has been given initial approval for mixed-use development by the HDA, it is critical that the type of uses provided on the site still align with the strategic vision of the precinct i.e. focus on employment uses for health and education sectors as well as key workers housing.
- The EIS should include investigation to the appropriate combination of affordable residential and employment uses on the site which aligns with Council's and State Government's vision for the precinct.

2. Statutory Context

Supporting Documentation: To be addressed in the EIS

Address relevant *IWLEP 2022* provisions, including but not limited to:

- MUI Mixed Use zone
- Clause 6.9 Design excellence
- Clause 6.13 Residential accommodation in zone MUI
- Clause 6.14 Diverse housing

3. Site Isolation

Supporting Documentation: To be addressed in the EIS

The proposal should consider the development potential on the adjoining lots to the south of the subject site. The terrace housing between 56 and 72 Pymont Bridge Road should be included in the subject site to facilitate a better urban planning outcome. It is considered that significant amenity impacts and site isolation would occur if this consolidation does not occur. Protecting the future development opportunities of the adjoining lots is also more significant than ever as Council works with DPHI to appropriately locate areas capable for future housing to address the current housing emergency. An integrated approach is required to demonstrate that a proportionate uplift can be achieved across the immediate area, the site, and the adjoining properties.

4. Affordable Housing

Supporting Documentation: Economic Feasibility Assessment, Proposed LEP provision re. affordable housing, and if required, Planning Agreement

The scoping report states that the proposed development would include a 15% affordable housing component of the residential floorspace (for 10 years). This is inconsistent with Council's Affordable Housing Policy which requires an affordable housing contribution of 15% of new residential floor space to be dedicated to very low-, low- and moderate-income households **in-perpetuity**. Where the 15% affordable housing target is not feasible, the land value uplift associated with these proposals and applications will be calculated on a case-by-case basis in accordance with Council's Voluntary Planning Agreement (VPA) Policy. Council will also consider a monetary contribution.

As outlined at the meeting Council has a draft Affordable Housing Policy which has been placed on public exhibition and will be reported to the August Council meeting. The exhibited draft policy proposes different affordable housing contributions.

The proposal should include investigation into a proportionate level of affordable housing to be provided in-perpetuity and or an equivalent monetary contribution. The EIS should be accompanied with an economic feasibility assessment which evaluates the financial feasibility of the development project at the proposed FSR including in-perpetuity affordable housing.

The EIS should include details of the intended mechanism to deliver affordable housing for the subject site (i.e. proposed LEP clause).

Council also encourages the Applicant to ensure the affordable housing component is well-integrated into the overall design of the residential accommodation and provided with sufficient amenity. The provision of an appropriate mix of apartment sizes, including three-bedroom apartments, is also strongly encouraged to ensure there are options to accommodate various households.

5. Design Excellence

Supporting Documentation: Design Excellence Strategy, Design Review Report

Prior to the HDA process a proposal such as this would have undergone a rigorous independent design review process as part of the Planning Proposal and Development Application Assessment through referrals to the Architectural Excellence Design Review Panel and Inner West Local Planning Panel by Council.

Given that this regular Council process will not be followed for this HDA application, commitment is required from DPHI that the proposal will be referred to the State Design

Review Panel (SDRP) for review and that the applicant will provide a Design Review Report which appropriately responds to the SDRP feedback.

A rigorous independent design review process is critical for this site and any other site in the Camperdown precinct which is envisioned to undergo major transformation from an industrial precinct into a very high-density mixed-use precinct. The proposal is ahead of any adopted Structure Plan/Public domain plans for the holistic redevelopment of the precinct. The draft masterplan being prepared for the State-led rezoning should therefore inform the proposal to prioritise the creation of vibrant, walkable, and safe neighbourhood and minimises environmental and amenity impact.

For reference, the Landcom Scheme in Annandale for WestConnex dive site went through a SDRP process including referral to the NSW Government Architect to ensure that the proposed built form is well designed and sensitively responds to the both the industrial character of heritage structures and the low-scale residential buildings in the adjacent heritage conservation area.

6. Impacts to Heritage Item

The entire site is listed as a local heritage item: *Warehouse, including interiors* (Item No. 179). The statement of significance sourced from the NSW State heritage inventory is as follows:

"The existing scale and form of the building, particularly bayed brick facades, parapets and brick detailing, should be retained. No new openings should be made in the facades and should remain as face brick. Its not necessary to remove painted signage. Any new signage and paintwork to be restricted to areas previously painted and affected by signs and elements."

The recommended management of the item is as follows:

The existing scale and form of the building, particularly bayed brick facades, parapets and brick detailing, should be retained. No new openings should be made in the facades and should remain as face brick. Its not necessary to remove painted signage. Any new signage and paintwork to be restricted to areas previously painted and affected by signs and elements."

General comments:

The proposal seeks to retain a "heritage façade zone"; however, it is noted that the heritage listing applies to the entirety of the site, including its interiors. As such, further investigation to clearly define the significant, characteristic elements of the site would be required. A detailed heritage assessment of the site will be necessary, incorporating historical analysis, an understanding of the site's development over time, and an assessment of the

significance of all buildings and fabric within the site, externally and internally. This assessment should address, but not be limited to, the building façades, overall form, materials, internal configuration and fabric, and significant views to, from and within the site. Working with the heritage fabric offers an opportunity to provide a design that is responsive to the current and proposed future context of the site and surrounds.

Any proposed design response must be informed by a clear understanding of the site's significant fabric, characteristics, and elements. Opportunities should also be explored to further retain and integrate historic fabric across the site, particularly the facade along Guihen Street. There may also be significant and/or historical internal fabric, configurations or other moveable items that should be retained and integrated into the proposal.

An interpretation plan is recommended to ensure that the heritage values of the site are appropriately communicated and conserved.

The proposal will also need to address potential impacts on adjacent heritage items, specifically:

- Kerb and gutter, Guihen Street (126)
- Kerb and Gutter, Chester Street (1943)

The design and location of new vehicle crossovers should be carefully considered to minimise the removal or alteration of significant fabric.

Proposed new buildings

The location, form, massing, and materiality of any new development should be informed by the established characteristics and features of the heritage items on the site. The design response should be sympathetic to the identified significant features and should reinforce the character of the site and its industrial characteristics and history.

New development should be, as much as possible, integrate with the existing building envelopes, massing, and configuration. Consideration should also be given to ensuring that significant fabric, configurations, volumes, and other elements (internally and externally) remain legible and, where possible, accessible, or visible to the public.

The impact of the proposed excavation for basement levels should be carefully considered and understood to ensure there is no damage to potentially fragile significant and/or historical fabric.

7. Built Form and Urban Design



Supporting Documentation: Urban design Study, Character analysis and desired future character for the site and surrounds, Visual Impact analysis, Wind assessment, 3D Design Model of the proposed development (in Rhino/ 3Ds Max) for Council testing/modelling

A detailed urban design study is to be submitted with the EIS including:

- a) Urban design and local place analysis of the site and its local context including but not limited to – existing and desired future character, heritage impacts, built form, open space and vegetation, topography, key view corridors, activities, and land use.
- b) Testing of several built form scenarios including distribution of massing and bulk, orientation, setbacks and separation distances and site layouts to demonstrate the best built form outcomes for the site and its surroundings.
- c) Demonstrating how the proposed FSR/height controls have been derived, providing rationale for the design approach and consideration of environmental impacts.
- d) Provide detailed justification on the proposed 24 storey height and FSR given the departure from the originally proposed 18 storey height. This increased height is not currently supported by Council considering the context of the proposed development of the area and the proposal being the tallest development with the most anticipated overshadowing impacts due to the site's north-eastern orientation on the block.
- e) Testing of base case (i.e., existing controls), proposed PRCUTS controls, and acknowledging that there is an imminent significant change proposal via the State-led rezoning that will provide further context for this site.
- f) Testing the maximum potential development uplift across the block, and for sites immediately adjacent to the block, including any applicable FSR/height bonus under the *Housing SEPP 2021* for affordable housing.
- g) Review of the proposal against – Part 1 – Identifying the context of the NSW Apartment Design Guide, confirming design response considered for at the urban block, site-specific and detailed building design scales.
- h) Review of the proposal against – Part 2 – Developing the controls of the NSW Apartment Design Guide, confirming details of the primary controls such as the building envelopes, height, floor space ratio, setbacks, building depth, building separation distances, landscape area, communal open space, deep soil and the like. The building separation analysis to consider the minimum separation with the potential built forms of the adjoining properties to the north, south, east, and west.
- i) Detailed design architectural drawings confirming the working of the proposal in floor plans, elevations and site-sections, compliance with the Part 4 – Designing the building of the NSW ADG, including consideration of services, parking, access etc.

- j) Refine the proposal to meet 15% deep soil planting and landscaped area (no basement encroachment) which should be ideally co-located with public domain improvements proposed adjacent to the site. This may result in a reduction in the proposed FSR on the site to ensure that adequate landscaping and tree canopy is provided.
- k) Assess impacts to the neighbouring properties and provide appropriate transition to these properties. In particular, test the overshadowing impact of development of the proposal and surrounding potential-built form to the proposed residential buildings south of Bignell Lane as well as visual privacy impact to the existing residential dwellings to the north and east of the site.
- l) Provide comparable examples of sites in neighbouring Councils with similar scale of development including proposed FSR and heights.

8. Public Benefits

Supporting Documentation: Planning Agreement, Public Domain Plan

If the site seeks to provide the proposed or similar uplift, public benefits should be provided, comparable to the Dive Site.

The proposal should be accompanied with a Planning Agreement which includes:

- Dedication of land to Council for public domain improvements where applicable/agreed
- Delivery of public domain improvements including footpath widening, shared zone, landscaping and tree plantings along Pyrmont Bridge Road, Booth Street, Chester Street and Guihen Street
- In-perpetuity affordable housing/monetary contribution
- Potential other public benefits such as:
 - Provision of new affordable commercial space within the development for creatives and not-for-profit businesses
 - Incorporation of public art
 - Monetary contribution towards community infrastructure

Follow-on discussions can be arranged to discuss negotiations regarding the above through the Properties team in Council.

9. Public Domain, Building Setbacks and Landscaping

Supporting Documentation: Landscape Plan, and Public Domain Strategy

Given the significant uplift proposed by this application, consideration must be given to the ground plane of the site in terms of activation, pedestrian circulation, and vehicular access.

Public Domain improvements required should be addressed at the level of the precinct and not just the subject site. There is a pipeline of proposed high-density mixed-use developments in Camperdown/Annandale, and a significant level of public domain improvements are required to support the proposed level of residential activity in this precinct.

Adequate setback, including of the basement, and land dedication is required to widen the footpaths, provide landscaping/tree canopy, and not protrude into the deep soil zone at Pyrmont Bridge Road, Booth Street, Chester Street and Guihen Street. This is to be determined by the Public Domain Strategy. Comfortable street environments for pedestrians with high levels of daylight, appropriate scale, sense of enclosure and wind mitigation are to be achieved.

10. Aboriginal Cultural Heritage

Supporting documentation – Connecting with Country

Council encourages the Applicant to further explore opportunities to incorporate connections to Country in the overall design of the proposal. For example, the site is located within proximity of Johnstons Creek and is potentially a sensitive Aboriginal area.

The report should outline how it has considered and responded to the NSW Government's 'Better Placed – Connecting with Country'.

11. Environmental Amenities

Supporting documentation – Overshadowing impact on the current and future proposed developments in the vicinity of the site, view lines from public streets/ spaces, key intersections and adjacent Heritage Item, Wind testing, visual privacy impact on the neighbouring development to the north and east of the site

The following are to be provided:

- a) Assessment of the environmental impacts of the proposed development on the neighbouring sites, showing the existing and future development. This should include visual impact assessment, visual privacy assessment, wind impact, noise impact.
- b) Photomontages and 3D views of the proposal, including prominent views from local streets within the surrounding public domain, to review compatibility of the proposal with its context.
- c) Solar access and overshadowing analysis to understand the impacts to the subject site and surrounding properties and public space/through site links (during winter



solstice) at hourly intervals between 9am and 3pm, testing their future development potential, including all bonuses.

- d) Wind testing to ensure that comfort levels can be maintained around the site and its surroundings, especially through the proposed through-site links

12. Environmental Impact Assessment

Supporting Documentation: Air Quality Impact Assessment, Noise Impact Assessment, and Health Impact Assessment

Parramatta Road has an annual average daily traffic volume of more than 40,000 vehicles. Residents living close to busy roads are exposed to several environmental health risks, including air pollution, noise pollution, and reduced quality of life. To assess and justify whether the health impacts are acceptable, Air Quality and Health Impact Assessment reports are required. The residential component of the proposed development is a type of development that is sensitive to traffic noise or vehicle emissions and as such is required to be appropriately located and designed, or to include measures to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road under the *Transport and Infrastructure SEPP 2021*.

Air Quality Impact Assessment (AQIA)

- Measure current and projected concentrations of pollutants (NO₂, PM10, PM2.5)
- Include dispersion modelling to assess pollutant spread from Parramatta Road
- Compare findings with national health-based air quality standards
- Suggest mitigation (e.g., filtration systems, building setbacks, vegetation buffers)

Noise Impact Assessment

- Address the requirements as per the *Transport and Infrastructure SEPP 2021*.
- Measure baseline noise levels (dB) at various times of day
- Model future noise levels based on projected traffic volumes
- Assess compliance with acceptable thresholds
- Recommend mitigation (e.g., sound barriers, acoustic glazing, building orientation)

Health Risk Assessment (HRA)

- Evaluate the likelihood of adverse health effects based on exposure
- Integrate the above air and noise data with health vulnerability of nearby populations (e.g., children, elderly) and future residents within the development

13. Ecologically Sustainable Development (ESD)

Supporting documentation: Address in EIS and Rezoning Proposal

The EIS should be consistent with the proposed environmental sustainability controls (energy and water requirements) in PRCUTS and Council's Draft Parramatta Road LEP Stage 1, as also outlined below:

Development type and threshold	Minimum energy target	Water target
High Rise residential buildings or residential as part of mixed-use developments: 6-20 storeys Office (base building) • A new office building ≥ 1,000m2 nett lettable area (NLA) or more, or • A refurbishment to an existing office building that contains a NLA or 1,000m2 or more, or An existing office building of 1,000m2 NLA or more with an addition of 500m2 or more NLA	5-point increase over the Sustainable Buildings SEPP ≈ BASIX Energy 65 • Maximum 45 kWh/yr/m2 of gross floor area (GFA) or, • 5.5 star NABERS Energy Commitment Agreement (CA) + 25% or, • Certified Green Star Buildings rating with a "credit achievement" in Credit 22: Energy Use, or equivalent	BASIX Water 50 (and up to 60 where recycled water is available) for all new dwellings NABERS Water 4 star (5 star where recycled water is available)

- Camperdown is identified as a low-carbon net zero precinct in Council's Local Strategic Planning Statement. The proposal should identify how it would support this vision through incorporation of sustainability measures such as:
 - Green infrastructure
 - Water-sensitive urban design
 - Energy-efficient buildings
 - Tree canopy coverage and biodiversity

14. Traffic and Parking

Supporting Documentation: Traffic study including microscopic traffic model and network assessment

Traffic

The proposal should provide adequate information to show that the traffic generated post development does not have a significant impact to the road network by presenting:

- The potential queues at major intersections and proposed accesses, and
- The proposed upgrade(s) (if any) to manage the delays and queues noting the limited access to/from the site, including possible large vehicle/delivery/maintenance vehicle possible routes.

The traffic model should include the overall growth in the Parramatta Road Corridor beyond the subject site to understand the cumulative impact of the proposed developments along the Corridor. This should be based on the Strategic Travel Model outputs by TfNSW.

The Traffic and Transport Study should also adequately respond to the actions from the Precinct-wide Traffic and Transport Study (Cardno, 2022).

It is recommended to undertake a network assessment, including assessing queues and travel time for pre and post-development along the boundaries of Parramatta Road, Pyrmont Bridge Road, and Mallett Street.

Traffic Impact Assessment to demonstrate local road network, including State Roads, can accommodate movements and safety re: the proposed provision of on-site parking and loading facilities. Given the number of applications now being considered by the HDA, a Traffic Impact Assessment that considers the cumulative impact should be developed.

Depending on the location of the vehicle access points, the proposal may constitute Traffic Generating Development with frontage to/access within 90m of a classified Road. Previous reports indicated the hospital development would have reduced the functioning of the Pyrmont Bridge Road/Parramatta Road intersection from level of service (LOS) C to D within 7 years.

Access and Parking

The proposal should minimise the amount of vehicular traffic generated from the proposed development and encourage mode shift towards sustainable transport modes including public transport and active transport. This is in line with the recommendations of PRCUTS.

The following maximum car parking rates should be used as per PRCUTS.

Category	Residential (maximum space per dwelling)	Other (maximum space per GFA)
Category A (Camperdown Precinct and Frame Area)	• Studio – 0 • 1 Bed – 0.3 • 2 Bed – 0.7 • 3 Bed – 1	• Commercial ○ Commercial and office premises – 1 space per 150sqm ○ Restaurants – 1 per 50 sqm

	• Visitor – 0 ○ Retail – 1 space per 100 sqm ○ Bulky goods – 1 per 50 sqm • Industrial – 1 space per 150sqm
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Further, all the car parking spaces should be provided as unbundled car parking meaning that where car spaces are sold or leased separately from residential units and commercial units. This would require car spaces to be identified as individual lots on separate strata subdivision plans.

Bicycle Parking and end of trip facilities (worker facilities) should be included in the EIS at a rate consistent with or greater than that in the PRCUTS Planning and Design Guidelines 2016. Bicycle parking should be provided in locations that are convenient, easy-to-access and in accordance with AS2890.3 for all future site occupants (residents, workers, customers/visitors). All bike parking is to be accommodated within the site (not in public domain). All bike parking types and locations should be detailed in the architectural drawings.

A dedicated removalist truck parking area accessed should be incorporated to allow appropriate site access/manoeuvring design is recommended.

All vehicle access to the basement car park and servicing of the site are not to be located on Booth Street. Vehicle access must be a minimum of 6m from intersections in accordance with the requirements of AS2890.1

15. Waste Management

Supporting Documentation: Waste management plan

The proposal is to comply with the Inner West Council Waste Designing and Building Guidelines and the following matters are to be addressed:

- a) Design for weekly garbage, fortnightly recycling, and weekly FOGO.
- b) Onsite collection of waste is required for buildings of over 50 residential units. This means access for a fully laden heavy rigid vehicle (HRV).
- c) Council provides 240L bins for all waste streams. Larger bins (e.g. 660L bins) are strongly discouraged as they create more WHS concerns for crews and property caretakers/staff, promotes dumping of larger objects, and take up to 3 months to replace when damaged.
- d) In 2023 Inner West Council introduced a food organics recycling (FOGO) program which is available to all residential properties and is a mandatory service. This service is to be considered in the design of the development, including storage of a

INNER WEST

kitchen benchtop bin in the rooms/units and how residents will dispose of food waste.

- e) Bulky waste storage to be provided as per the Leichhardt DCP.
- f) Where commercial tenancies are proposed, all commercial waste storage areas are to be mutually inaccessible to residential.
- g) Circular Economy – it is recommended that a space be allocated for and actively encourage reduced consumption with space for reuse and sharing/library of things within the development.
- h) An internal loading dock is to be provided to service the development and must be suitable to accommodate Council's waste vehicle and removalist trucks. Collection of waste and servicing of the site shall not occur from the adjacent road reserve.



File Ref: EXTERNAL/2025/0010

7 July 2026

Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Patrick Copas

SSD-84467726 – Kogarah Golf Club Redevelopment – Concept & Stage 1 Works

Thank you for providing Council with the opportunity to comment on the concept proposal and stage one development application for the former Kogarah Golf Club at 13-19A Marsh Street, Arncliffe.

This submission is made by council officers, not the elected representatives.

Council has reviewed the submitted information and, in summary, considers that the redevelopment of the site has the potential to make a positive contribution to the business enterprise precinct. However, Council considers that the Traffic Report would benefit from further detail to demonstrate how the Traffic and Transport SEARs have been addressed, particularly in relation to the operational impacts on Princes Highway / Gertrude Street and potential impacts on the Inner West LGA.

Specifically, the report provides detailed trip generation estimates, including:

- AM peak: 803 vehicles into the site and 397 vehicles out of the site; and
- PM peak: 484 vehicles into the site and 776 vehicles out of the site.

However, the report would benefit from further detail and an assessment of the distribution of development-generated traffic, including the extent to which traffic may travel through or impact the Inner West LGA, both on main roads and local through-roads.

In particular, the report does not identify how many development generated vehicles are expected to:

- Turn left from Princes Highway into Gertrude Street to access the site; or
- Turn right from Gertrude Street into Princes Highway when leaving the site.

It should be noted that the SEARs require assessment of both trip generation and trip distribution, including impacts at key intersections.



Council recommends that the applicant provide a supplementary assessment to further clarify the following matters:

- A clear analysis of traffic distribution arising from the proposed development;
- A statement on the specific traffic impacts on the Inner West LGA;
- Assessment of impacts on relevant main roads and local through-roads within the Inner West LGA; and
- An intersection analysis of Princes Highway / Gertrude Street, including relevant turn movements, intersection performance, queuing, delay and any required mitigation.

Council also notes a potential inconsistency in the report's figures. The report refers to SCATS data for both Marsh Street / Flora Street and Princes Highway / Gertrude Street; however, Figures 30 and 31 are both labelled "Traffic volume comparison - Marsh Street / Flora Street intersection." This creates uncertainty as to whether the Princes Highway / Gertrude Street data has been clearly presented and assessed.

As outlined above, whilst Council raises no objection to the uplift, revitalisation and utilisation of an underdeveloped site, it is important that the proposal demonstrates that any associated impacts on surrounding local government areas have been appropriately considered and managed. On the information currently provided, it appears that further assessment is required in relation to traffic impacts.

The submitted documentation would benefit from further detail to provide a more complete understanding of the proposal's potential impacts. Accordingly, Council recommends that further information be requested to address the matters identified above before any determination is made in relation to the application.

We would invite the applicant and the DPHI to meet with Council to discuss this proposal and future proposals that may be considered. In the meantime, if you need any further information in relation to the above response, please contact Katerina Lianos on 9392 5820 or katerina.lianos@innerwest.nsw.gov.au

Yours faithfully

A handwritten signature in black ink, appearing to read 'Simone Plummer'.

Simone Plummer
Director Planning