



Submissions Report

47-55 Bunnerong Road, Kingsford

State-Assessed Planning Proposal

Prepared on behalf of Homes NSW

4 March 2025

Document control

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Project summary

Prepared on behalf of	NSW Land and Housing Corporation (operating as Homes NSW)
Land to be developed	47-55 Bunnerong Road, Kingsford
Legal description	Lot 1 DP 433534
Project description	Planning Proposal to amend height and FSR controls to facilitate the renewal of existing social housing on site to deliver increased social and affordable housing at 47-55 Bunnerong Road, Kingsford.

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1 Introduction

This Submissions Report has been prepared by FPD Planning on behalf of Homes NSW to support the assessment of a State-Assessed Planning Proposal (SAPP) for the site at 47-55 Bunnerong Road, Kingsford.

The SAPP is being assessed in accordance with the 'Prioritising rezonings that deliver social and affordable housing' Program which was introduced by the NSW Government in May 2024 to accelerate rezonings for social and affordable housing.

The SAPP seeks an amendment to the *Randwick Local Environmental Plan 2012* (Randwick LEP) to amend the height and Floor Space Ratio (FSR) controls to facilitate the renewal of the site to deliver increased housing supply, including increased social and affordable housing. The SAPP will provide for up to 50% of dwellings as social and affordable housing on the site.

The proposal aims to facilitate renewed social housing and increased housing supply in a highly accessible location in the Kingsford South Housing Investigation Area – an area identified for significant renewal and housing growth.

The proposal will facilitate approximately 185 new dwellings in a mixed tenure configuration and includes the following amendments to the Randwick LEP:

- Increase maximum height of buildings from 12m to 28m, and
- Increase maximum floor space ratio from 0:75 to 2.7:1
- No change to the R3 Medium Density Residential zoning.

The proposal is supported by draft amendments to the Randwick Development Control Plan 2012, which provides recommended site-specific controls for the site.

The SAPP was exhibited from 16 December 2024 to 4 February 2025.

In total 3 submissions were received in response to the public exhibition of the proposed modifications. Of the total submissions, one submission was received from Randwick Council, and 2 submissions were received from the public. Agency advice was received from Sydney Water and Transport for NSW.

This Submissions Report has been prepared to address matters raised in submissions from Randwick Council and members of the public during exhibition of the proposal.

2 Summary of Submissions

The SAPP was exhibited from 16 December 2024 to 4 February 2025.

In total 3 submissions were received in response to the public exhibition of the SAPP. Of the total submissions, one submission was received from Randwick Council, and 2 submissions were received from the public.

Advice from Government agencies is addressed in Section 3.3

2.1 Breakdown of submissions

2.1.1 Submission from Council

One submission was received from Randwick Council.

Council was generally supportive of the proposal, and provided comments on the following matters:

- Request for greater certainty regarding the provision of social and affordable housing on site
- Request for Homes NSW to consider opportunities to provide more social and affordable as part of the future development of the site
- Request for further information on the ownership and management of social and affordable housing
- Ensure building heights and setbacks minimise impacts on surrounding areas, including Daceyville heritage conservation area and neighbouring properties.
- Support for retention of significant trees and landscaping strategy, and vehicular access location.
- Request for updates to draft Development Control Plan (DCP) amendment and request for certain provisions in the Randwick Housing Investigation Area DCP to apply to the site.

2.1.2 Submissions from the public

Two submissions were received from members of the public.

The key issues raised in public submissions included:

- Proposed density and parking impacts
- Amenity considerations, including construction noise and visual impacts
- Request to establish a refuge for the homeless

A response to each of the issues raised in the submissions is provided in Section 3 of this Report.

2.1.3 Government Agency advice

Advice was received from the following Government agencies:

- Sydney Water
- Transport for NSW

The matters raised in the Agency advice are addressed in Section 3.3.

3 Response to Submissions

A response to the issues raised in submissions from Randwick Council is provided in Section 3.1 and a response to the matters raised in public submissions is provided in Section 3.2.

3.1 Randwick Council

Table 1 below provides a response to each of Council's comments in relation to the proposal.

Table 1: Response to Council submission

Item	Submission detail	Response
1 Strategic Merit		
1.1	The Housing Strategy sets a housing target of 4,300 new dwellings by 2026 and identifies housing growth opportunities in the medium to long term to meet projected population growth based on expected demographic changes and housing need. Furthermore, the DPHI have provided an updated housing target for Randwick City of 4000 dwellings to be delivered in the 2024-2029 period.	The proposal will deliver increased housing supply close to transport and services and will assist with meeting the housing targets in the Housing Strategy for the Randwick LGA.
1.2	The Local Strategic Planning Statement and Housing Strategy both identify the need to deliver additional housing to meet housing demand in areas that are accessible to public transport, services and employment. In relation to affordable and social housing the Housing Strategy sets a target of 1,918 social housing dwellings and 1,765 affordable rental dwellings.	<p>The proposal will assist with meeting the targets for social and affordable housing in the LSPS and Housing Strategy. It will provide for renewed and increased social housing on the site and provide opportunities for affordable housing close to transport, services and employment.</p> <p>The proposal allows for up to 50% of dwellings on site to be provided as social and affordable housing.</p>
1.3	<p>When considering the merits of the Planning Proposal in the context of the existing regional and local strategic planning framework, it is agreed that the proposal has strategic merit for the following reasons:</p> <ul style="list-style-type: none"> • The proposal would contribute to meeting housing targets outlined in the LSPS, the HS and by the DPHI, by increasing housing delivery and residential density in the Kingsford South HIA; • The proposal would provide an integrated approach to land use and transport planning by concentrating new housing in an accessible area in proximity to employment, services and public transport; and • The proposal would help deliver an increase in social and affordable housing in the LGA- two forms of housing that are in great need in the local area. 	<p>Agreed. The proposal demonstrates strategic merit.</p> <p>It will deliver increased housing, including social and affordable housing, in a highly accessible and well serviced location.</p>

Item	Submission detail	Response
2 Affordable and Social Housing		
2.1	<p>The Planning Proposal does not commit to a minimum floor space requirement for affordable/social housing via an LEP provision. The absence of a specified minimum percentage for affordable/ social housing floor space creates considerable uncertainty as to the quantum and proportion of affordable and social housing that would be delivered at the SSDA stage to address local housing needs effectively.</p>	<p>The planning proposal commits to deliver up to 50% social and affordable housing as part of the renewal of the site. This is consistent with NSW Government policy and will deliver increased social and affordable housing as part of a mixed tenure community on the site.</p> <p>A provision in in the LEP is not required, as the land is wholly owned by Homes NSW whose primary responsibility is the delivery of social and affordable housing.</p> <p>The tenure mix and social and affordable housing split will be determined at the detailed SSDA stage, based on local housing needs, optimum tenure mix and funding availability.</p> <p>The need for Homes NSW to have operational flexibility is recognised under the provisions of the Housing SEPP. Clause 15B (2) of the Housing SEPP confirms that residential development undertaken by Homes NSW is affordable housing, and Clause 21(2) excludes development by public authorities such as Homes NSW from any restrictions or requirements for development to be managed as affordable housing. The relevant extracts are provided below:</p> <ul style="list-style-type: none"> • <i>Part 2 Division Clause 15B(2) states that 'In this division, residential development carried out by or on behalf of the Aboriginal Housing Office or the Land and Housing Corporation is taken to be used for the purposes of affordable housing.'</i> • <i>Part 2 Division 1 Clause 21 (2) of the Housing SEPP excludes any requirement for 'development owned by a relevant authority or to a development application made by, or on behalf of a public authority' to be used for affordable housing.</i>
2.2	<p>The subject site offers a rare and unique opportunity to significantly contribute to the amount of affordable and social housing locally, given its strategic location near employment, services, and transport. Potential funding via the Federal Government's Housing Australia Future Fund Facility (HAFFF) may further support the ability of the site to deliver higher levels of affordable and social housing.</p>	<p>The renewal of the site will deliver up to 50% of dwellings as social and affordable housing, which is a significant increase on the current 54 dwellings on site.</p> <p>In accordance with Chapter 2, Part 2 of the Housing SEPP, residential development undertaken by Homes NSW is taken to be used for affordable housing. As all residential development undertaken by Homes NSW is deemed to be affordable housing there is no</p>

Item	Submission detail	Response
	<p>Council accordingly seeks assurance regarding the amount and proportion of affordable housing and social housing units to be delivered on the site and this should be through a legislative mechanism via the local planning framework.</p>	<p>need for a legislative mechanism to deliver affordable housing on the site.</p> <p>Homes NSW are committed to delivering a significant portion of new housing on the site as social and affordable housing. The exact split and mix will be determined at the SSDA stage in accordance with Homes NSW operational requirements and in response to local housing need.</p> <p>The advantages of mixed tenure communities are well documented, and Homes NSW aims to provide social and affordable housing that is well integrated with private dwellings.</p>
2.3	<p>Given its strategic and locational attributes, the potential of Government's funding available under the HAFFF, and examples of funded developments dedicating 100% of floor space as social/affordable housing in the local area, Council consider that the site offers a unique opportunity to provide up to 100% of its total floor space as affordable/social housing.</p>	<p>As outlined above, Homes NSW are committed to delivering up to 50% of dwellings as social and affordable housing on the site, consistent with Government policy.</p> <p>Homes NSW will seek to maximise the amount of social and affordable housing as part of the detailed design stage, subject to operational requirements and the desire for a well-integrated social cohesive tenure mix.</p> <p>There is no existing policy basis for a requirement for the imposition of tenure mix controls particularly one greater than 50%.</p> <p>If Homes NSW can deliver more social and affordable housing on site, this can be more appropriately addressed at the development application stage.</p>
2.4	<p>An LEP clause mandating a minimum dedication of affordable and social housing is highly desirable to provide increased design certainty against the potential in-fill affordable housing density bonuses available via the Housing SEPP.</p> <p>As specified by the In-fill affordable housing Practice note, any local requirements for affordable housing do not count towards the minimum required affordable housing component under the Housing SEPP in-fill affordable housing provisions. Therefore, if the LEP does not contain any minimum dedication clause, the notional 50% affordable and social housing provision expressed in the Planning Proposal that is used as strategic justification for the PP could also be utilised to access the in-fill affordable housing provisions.</p>	<p>Homes NSW do not support the inclusion of a LEP clause requiring a minimum dedication of affordable and social housing.</p> <p>To confirm, the social and affordable housing provided on site will be managed by Homes NSW or a Community Housing Provider and will not be dedicated to Council.</p> <p>It is not equitable to remove the in-fill bonus provisions on this site as the bonus provisions continue to apply to all other land including the Low and Mid Rise areas and TOD station precincts. It is also not aligned with the Government policy objectives to deliver more affordable housing in highly accessible locations.</p> <p>Part 2 of the Housing SEPP states that all housing developed by the Land and Housing Corporation (Homes NSW) is considered</p>

Item	Submission detail	Response
		<p>affordable housing, with no restrictions or requirement to be managed as affordable housing.</p> <p>Residential development undertaken by Homes is affordable housing and therefore, the bonus provisions should continue to apply.</p> <p>Specifically, Clause 15B (2) confirms this, and Clause 21(2) excludes developments by public authorities such as Homes NSW from any restrictions on the development to be used for affordable housing. Refer to extract below.</p> <ul style="list-style-type: none"> Part 2 Division Clause 15B(2) states that 'In this division, residential development carried out by or on behalf of the Aboriginal Housing Office or the Land and Housing Corporation is taken to be used for the purposes of affordable housing.' Part 2 Division 1 Clause 21 (2) of the Housing SEPP excludes any requirement for 'development owned by a relevant authority or to a development application made by, or on behalf of a public authority' to be used for affordable housing. <p>There is no existing policy basis for a requirement for the imposition of tenure mix controls particularly one greater than 50%.</p>
3 Urban Design		
	<p>The overall design concept is commendable, particularly the well-considered site layout incorporating a central shared open space and reduced five-storey streetscape presentation to Anderson Street. The general building envelope indicated in the design concept reflects Council staff feedback and would result in reduced visual bulk.</p>	<p>Noted.</p>
4 Building Height		
	<p>The requested height exceeds the height limits of the surrounding Kingsford South HIA, which are 16.5m to the east and north, and 9.5m for the low-density residential area south of Anderson Street. Notwithstanding this, the visual impact is somewhat mitigated through overall and upper-level building setbacks proposed in the design concept, along with a 16.65m landscape setback to Bunnerong Road and a step down to five storeys along Anderson Street, the most sensitive interface of the development.</p>	<p>The recently introduced Low and Mid Rise Housing Policy Reforms allow for development of 6 storeys on surrounding land and Council own planning controls allow much greater heights of 51m (approximately 15 storeys) in very close proximity to the site.</p>

Item	Submission detail	Response
	<p>The eight-storey height is only appropriate with generous setbacks from the two primary street frontages. If the eight storey part of the building is well setback, then the proposed height would provide a suitable transition from the taller Kingsford Town Centre buildings to the north (ranging from nineteen storey node sites down to nine and seven storeys), to the Kingsford South HIA to the north and east (five storeys), and the low-density residential area south of Anderson Street (one to four storeys).</p> <p>The building height and massing are also mitigated through upper-level setbacks of 2m and 6m for the top two levels, articulating the building's top and reducing its apparent scale when viewed from Anderson Street.</p>	<p>The proposal is consistent with the recently introduced Low and Mid Rise Housing Reforms which allow for development of 4 and 6 storeys (excluding any affordable housing bonuses) on surrounding land within 400m and 800m of the Juniors Kingsford Light Rail.</p> <p>Generous setbacks ranging from 5m to 16m have been provided along Anderson Street and Bunnerong Road to retain existing trees, allow for additional tree planting and provide landscaped setbacks along both street frontages.</p>
5 Density		
5.1	<p>The proposed density increase is considered reasonable given the site's size and context, including its proximity to public transport, Kingsford Town Centre, schools, and recreational green space, and the limited impact on residents in the low-density area south of Anderson Street and the two frontage streetscapes.</p>	<p>Noted.</p> <p>The proposal is consistent with current Government policy to increase housing – particularly social and affordable housing, in areas close to public transport, services and amenities.</p>
6 Built Form		
6.1	<p>The proposed built form includes two eight-storey wings with a five-storey step down along the Anderson Street frontage and a partial 16.65m setback along Bunnerong Road to retain three mature trees. These setbacks, combined with upper-level setbacks, help mitigate the overall bulk and scale of the building when viewed from Anderson Street and the Dacey Gardens Heritage Conservation Area (HCA) to the west of Bunnerong Road in the adjoining Bayside Council LGA.</p>	<p>Noted.</p>
6.2	<p>The 'U' shaped building massing effectively defines the two street frontages and creates a communal open space (COS) at the heart of the development. This design component is commendable as it provides a landscaped social meeting place for future residents with a northern aspect and a visual connection to the adjoining open space to the north. The landscaped COS offers an attractive green outlook for future apartments and is also strongly supported.</p>	<p>Noted.</p>
6.3	<p>The design concept indicates a series of building parts at different heights, incorporating steps</p>	<p>Noted.</p>

Item	Submission detail	Response
	and recesses, which would assist in modulating and articulating the building envelope, reducing the visual bulk and scale. The proposed apartment/lift core planning, with four cores serving 6-7 apartments each, fosters small group socializing and a sense of ownership within the building which is a positive approach.	
7 Building setbacks		
7.1	The north part of the Bunnerong Road frontage, that has no landscape setback, presents an eight-storey building to this streetscape. It is requested to introduce a step down in height to five storeys along this frontage to mitigate the impacts of the scale and bulk of the building on the Bunnerong Road streetscape and the Dacey Gardens HCA.	<p>The proposal provides for a minimum 5m landscaped setback along the length of the Bunnerong Road frontage.</p> <p>A 5m front setback is provided at the northern end of Bunnerong Road, with provides an appropriate setback for the 8-storey height in this location.</p> <p>The proposed 8-storey height on the northern end of Bunnerong Road is considered appropriate for the site context and provides an appropriate interface to the Daceyville conservation area and an appropriate transition to the Kingsford town centre.</p> <p>The proposal does not result in any unacceptable impacts to the public domain or neighbouring properties and the landscaped setback and mature trees along Bunnerong Road will screen future buildings up to 8 storeys on the site, minimising any visual impacts.</p> <p>As outlined in Item 13.1, and the Heritage Impact Statement submitted with the planning proposal, the proposal will have acceptable impacts, with proposed setbacks, landscaping and modulated form reducing visual impacts from the Daceyville conservation area.</p>
7.2	The 5m and 6m ground level setbacks to the two street frontages introduce the opportunity for ground floor apartments to incorporate private court gardens, enhancing amenity for ground floor residents (particularly families) and improving passive surveillance for the streets. Clarity is requested on whether this design opportunity has been incorporated.	<p>The proposal provides opportunity for ground floor apartments and front gardens along Anderson Street and Bunnerong Street.</p> <p>The draft DCP amendment includes a provision to 'provide ground floor apartments along Bunnerong Road and Anderson Street to enhance residential activation and amenity'.</p>
8 Landscaping and Tree Management		
8.1	Council strongly supports the retention of significant trees to improve environmental amenity and soften the built form. The proposed replacement ratio of 2:1 for existing trees removed is also supported. It is further noted	<p>Noted.</p> <p>Landscaping and tree protection measures to be considered in further detail at the SSDA stage.</p>

Item	Submission detail	Response
	that an adequate setback from the root ball/drip zone of the retained trees to the proposed building structures would require detailed arboreal advice and consideration in the design development.	
8.2	<p>The following matters regarding landscape provision in terms of the RDCP 2013 requirements and ADG requirements are noted:</p> <ul style="list-style-type: none"> Communal open space: The ADG requires 25% of the site to be set aside for COS. The proposal exceeds this requirement with 32.6% COS, which is supported by Council for increased amenity for future residents. Deep Soil Permeable Area: The ADG requires 7% deep soil area, and the HIA DCP requires 35%. The proposal achieves 16.3%, exceeding the ADG but approximately half of the DCP requirement. The Deep Soil plan and calculation should be updated to include all deep soil areas for accurate assessment. Gross Landscape Area (GLA): The HIA DCP requires 60% GLA, including planting on structure and paved areas. The proposal does not include this measurement. The GLA calculation should be submitted for further consideration and review. Tree Canopy Cover: The HIA DCP requires 25% Canopy Cover. The Landscape Report indicates 41.4% canopy cover, but no map has been provided. Council requests the tree canopy cover calculation according to the HIA DCP methodology for review. 	<p>Noted.</p> <p>The proposal provides for generous communal open space, deep soil, tree canopy cover and landscaping as part of future development on site.</p> <p>Landscaping to be considered in further detail at the SSDA stage.</p>
8.3	<p>The following targeted outcomes of the proposal are generally supported:</p> <ul style="list-style-type: none"> 41.4% of the site covered by tree canopy (map and calculation to be provided at SSDA stage). 33 new trees to be planted throughout the precinct. 110m² of community gardens. 1853m² of communal open space on deep soil. 	<p>Noted.</p> <p>The proposal provides for generous tree canopy cover and landscaping as part of future development on site.</p> <p>Landscaping and tree canopy to be further considered as part of future SSDA.</p>
8.4	An AQF Level 5 Consulting Arborist should be engaged for the project duration to supervise relevant stages and ensure implementation of the Recommendations at Section 6 of the report. Certification of compliance with the Recommendations/TPP is required from the Project Arborist before, during, and upon completion of works.	<p>To be addressed at development application stage.</p> <p>Any future development application will be supported by an Arboricultural Impact Assessment, which will include recommended management and mitigation measures to be implemented for future development.</p>
	The design objectives for the landscaping and communal open space are supported for	Noted.

Item	Submission detail	Response
	<p>improved environmental amenity for future residents. The following information is requested at the SSDA stage for comprehensive assessment:</p> <ul style="list-style-type: none"> Clearly identify areas of Deep Soil and 'on podium' for accurate assessment. Ensure nature play/play equipment areas comply with relevant Australian Standards. Submit a Plant Schedule identifying quantities, densities, mature dimensions, pot size, and other standard inclusions. Select species suitable for the prevailing soil type, aspect, wind exposure, solar access requirements, screening/privacy, and dimensions similar to future buildings 	<p>To be addressed at development application stage as part of the Landscape Plans.</p>
9 Vehicular access		
9.1	<p>Council supports the vehicular entry from Anderson Street, which is set back from the intersection with Bunnerong Road, and the provision of basement parking. According to the development yield tables provided, 181 car parking spaces are proposed, including visitor parking. During the design development stage, a full breakdown of car spaces, motorcycle, and bicycle parking spaces is to be provided.</p>	<p>Noted. The proposal provides for basement parking and vehicle access from Anderson Street.</p> <p>The indicative basement area in the reference scheme provides capacity for approximately 200 parking spaces, demonstrating that the proposal can comply with the requirements in the Randwick HIA DCP.</p> <p>The amount of car parking to be provided on the site will be determined as part of the detailed design phase. A detailed parking assessment will be undertaken at DA stage, based on the proposed apartment mix and tenure mix for the site.</p> <p>A detailed assessment of car parking (including bicycle and motorcycle parking) will be undertaken as part of the SSDA.</p>
9.2	<p>The HIA DCP permits reduced parking rates (by one third) for this HIA, given the proximity to public transport, green spaces, and services and amenities. EV charging infrastructure is to be provided, car share is encouraged (with reduced parking provision considered at an agreed rate), and the preparation of a Green Travel Plan is required.</p>	<p>Parking will be provided in accordance with the requirements of the Housing SEPP and Council's HIA DCP as relevant to future development on the site.</p> <p>An assessment of parking, car share and sustainable transport measures will be undertaken as part of the Transport Impact Assessment to support any future SSDA.</p>
10 Shadow Analysis		
10.1	<p>The shadow diagrams provided indicate that the proposed height of eight storeys will overshadow the northern gardens of residences along Anderson Street during the winter solstice (12 noon-2 pm).</p>	<p>The shadow diagrams submitted with the planning proposal demonstrate that the proposal will have acceptable impacts.</p>

Item	Submission detail	Response
	Further upper-level building setbacks to the top level of the eight-storey west wing along this frontage are recommended to reduce the extent of overshadowing and the resultant impact on residents along the south side of Anderson Street.	<p>The proposal includes varied upper-level setbacks to Anderson Street to minimise overshadowing to adjoining properties.</p> <p>The proposal will result in only minor overshadowing to the front façade of residential buildings on the southern side of Anderson Street. The proposal will not overshadow primary living areas or private open space which is located to the rear of the properties.</p> <p>The proposal results in only minimal impact, with all properties maintaining at least 2 hours solar access in mid-winter.</p>

11 Materials and Finishes

11.1	The ground level photomontages and finishes palette provide useful information on the proposed streetscape appearance and architectural finishes for the building. Council supports the use of face brickwork and the articulation of the building forms, defining the base, middle, and top of the building, in alignment with the DCP E7 HIA objectives and controls. The proposed landscape palette of finishes is also supported by Council.	<p>Noted.</p> <p>The detailed design of the building, including finishes and materials will be further considered as part of the SSDA.</p>
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12 Draft Development Control Plan

12.1	To ensure that future development on the site is consistent with the proposed planning principles and objectives, it is recommended that the draft DCP include a provision requiring the submission of a statement demonstrating consistency with the planning principles and objectives as part of the SSDA documentation.	<p>A draft DCP amendment with site-specific provisions has been prepared and was exhibited with the planning proposal.</p> <p>The finalisation and adoption of the draft DCP amendment will be a matter for Council.</p>
12.2	To supplement the design excellence provision in the Randwick LEP and to ensure a high level of design quality, it is recommended that the HIA South Kingsford design excellence provision under the DCP be adopted for the site. This would include requiring a minimum 4-Star Building Standard certification rating (GBCA) performance and a review of the proposed design by the Randwick Design Excellence Panel (or similar for feedback) and their report be taken into consideration as part of the SSDA assessment.	<p>The draft DCP amendment includes site-specific provisions to guide development on site. It is intended that other relevant sections of the Randwick DCP, including the Part B General Controls and Part E7 HIA DCP, would continue to apply.</p> <p>Any future development will be subject to a design excellence process as part of the SSDA process.</p>

13 Heritage

13.1	The new built form proposes an 8 storey presentation to Bunnerong Road which appears to be inappropriate within its context particularly	The planning proposal is supported by a reference scheme which demonstrates an
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Item	Submission detail	Response
	<p>at its north-west corner. Along Anderson Street the proposed development illustrates a more appropriate built form transitioning to lower scale residential buildings with a 5 storey street presentation.</p> <p>To not detract from the visual characteristics of the HCA, it is recommended that an upper level setback is introduced to provide a reasonable pedestrian scaled street wall when viewed from Bunnerong Road. This would align better with the character of the area and mitigate visual impacts on the Dacey Gardens HCA.</p>	<p>appropriate response to the site's heritage and landscape context.</p> <p>As outlined in the Heritage Impact Statement submitted with the planning proposal, the proposal will have acceptable impacts, with proposed setbacks, landscaping and modulated form reducing visual impacts from the Daceyville conservation area.</p> <p>The retention of existing mature trees along Bunnerong Road assists in reducing the visual impact of the development when viewed from Daceyville. The Heritage Impact Statement confirmed that the scale of the proposal is compatible with the predominant front setback of Bunnerong Road and Anderson Street and the setbacks incorporate landscaping which compliments the predominate soft landscape treatments of Daceyville.</p> <p>The proposal provides a landscaped setback along the length of the Bunnerong Road frontage, with a minimum setback of 5m and up to 16m. An upper-level setback is also provided along part of the Bunnerong Road frontage to minimise visual impacts.</p> <p>The Heritage Impact Statement concluded that the proposal is sensitive to the immediate heritage context of Daceyville and any visual impacts are mitigated through building setbacks and the retention of street trees.</p> <p>Further consideration of heritage will be undertaken as part of a future SSDA in accordance with the heritage conservation provisions in the Randwick LEP.</p>

14 Environmental Sustainability

14.1	<p>It is requested that the following matters be considered and committed to at the design/SSDA stage:</p> <ul style="list-style-type: none"> • Address the requirements of Randwick DCP E7 HIAs, section 20. Sustainability. • Climate-resilient housing to ensure dwellings are adaptable to withstand extreme weather and environmental challenges • Opportunities to mitigate the urban heat island effect and provision of infrastructure for a dual reticulation system for potable and non-potable water use; • Net Zero and beyond- details of how this developed can be transitioned to be climate positive in the future i.e. infrastructure 	<p>The Sustainable Buildings SEPP will apply to future development on the site.</p> <p>The proposal is capable of achieving the sustainability targets in the Randwick HIA DCP and this will be further considered at the development application stage. Sustainability targets and proposed measures will be considered in the detailed design stage and provided as part of any future development application for the site.</p>
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Item	Submission detail	Response
	<p>configuration and capacity, and ensuring PV inverter suitable for battery system</p> <ul style="list-style-type: none"> • Commitments to minimising refrigerant Global Warming Potential limits in air conditioning systems and hot water system heat pumps with a GWP of less than 5; and • Commitments to minimal 4-star Green Star Buildings certification. 	
15 Community and social considerations		
15.1	<p>Although outside the scope of the Planning Proposal, as part of a future SSDA for the site, Council recommend an agreement between Homes NSW and the managing CHP to reserve a portion of the social and/or affordable portfolio specifically for Domestic and Family Violence survivors.</p>	<p>Noted and agreed. Not a relevant planning consideration for planning proposal.</p>
15.2	<p>Further detail is sought on whether the social housing dwellings are to be retained in Homes NSW (LAHC) ownership in perpetuity. Further information is sought on the ownership arrangement for the affordable dwelling component, and how long it would be retained as affordable housing dwellings. Notwithstanding project feasibilities, it is strongly recommended that the affordable housing component be retained in government ownership and provided indefinitely. This would ensure continuous community benefit, transparency of government ownership of the entire site and secure tenure for residents.</p>	<p>As outlined in Item 2.4, Part 2 of the Housing SEPP states that all housing developed by the Land and Housing Corporation (Homes NSW) is considered affordable housing, with no restrictions or requirement to be managed as affordable housing.</p> <p>Specifically, Clause 15B (2) confirms this, and Clause 21(2) excludes developments by public authorities such as Homes NSW from this requirement.</p> <p>Homes NSW intends to partner with a registered community housing provider (CHP) as part of any future development of the site to manage the affordable housing component.</p> <p>The ownership and management arrangements will be further considered at the SSDA stage.</p>

3.2 Public submissions

This section provides a response to the key issues raised in submissions from members of the public. A total of two (2) submissions were received by members of the community.

The key issues raised in these submissions are provided in Table 2.

Table 2: Response to public submissions

Submission detail	Response	Submitter
Establish a refuge for the homeless in the area and provide for continued maintenance by the developer.	The proposal will provide for up to 50% social and affordable on site to address the critical need for more affordable housing in the local area.	Alfred Rose
Concerns about increased housing density, changing demographics, and future maintenance of the buildings.	<p>The proposal is consistent with the current and planned densities for the Kingsford town centre and Kingsford South HIA.</p> <p>The recently introduced Low and Mid Rise Housing Policy Reforms allow for development of 6 storeys on surrounding land and the current planning controls for the Kingsford town centre allow heights of 51m (approximately 15 storeys) to the north of the site.</p> <p>The proposal will provide much needed social and affordable housing to address the critical need for more affordable housing options and local housing needs.</p> <p>Future maintenance of the building will be matter for Homes NSW as part of the ongoing maintenance and management arrangements of Homes NSW properties.</p>	Name withheld
Increased parking from residents	<p>The proposal demonstrates that the site can accommodate car parking in accordance with Council's HIA DCP requirements.</p> <p>Parking requirements will be further considered at the SSDA stage.</p>	Name withheld
Construction noise impacts	Potential construction noise impacts will be addressed as part of the SSDA and will be managed through the preparation of a Construction Management Plan.	Name withheld
Impact on views and outlook of the area	<p>The proposal provides generous setbacks and retains significant trees to reduce visual impacts and ensure future development integrates with the surrounding area.</p> <p>The retention of existing mature trees along Bunnerong Road and Anderson Street will screen future development and minimise visual impacts. The scale of the proposal is compatible with the existing and planned built form and will not result in any unacceptable view impacts.</p>	Name withheld

3.3 Agency advice

This section responds to agency advice received from the following State government agencies:

- Sydney Water
- Transport for NSW

Table 3 Response to agency advice

Issue raised	Response
Sydney Water	
Proponent to provide anticipated ultimate and annual growth data for this development as outlined in the enclosed Growth Data Form.	Noted. This is applicable for a future development application stage. The Growth Data Form will be provided as part of any future Section 73 application.
Water	
<p>The development is located within the Centennial Park Water Supply Zone.</p> <p>Preliminary assessment indicates the current system has capacity to service the development.</p> <p>Amplifications, adjustments, deviations and/or minor extensions may be required.</p> <p>Detailed requirements will be provided at the Section 73 application stage.</p>	<p>Noted.</p> <p>Water servicing requirements to be considered as part of any future development application.</p>
Wastewater	
<p>The development site is within the Randwick SCAMP and within the Botany system.</p> <p>Preliminary assessment indicates the current system has capacity to service the development.</p> <p>Amplifications, adjustments, deviations and/or minor extensions may be required.</p> <p>Detailed requirements will be provided at the Section 73 application stage</p>	<p>Noted.</p> <p>Wastewater servicing requirements to be considered as part of any future development application.</p>
Transport for NSW	
All vehicular and service access must be located off Anderson Road and as far as possible from the intersection of Anderson Road / Bunnerong Road.	The proposal provides for vehicular access from Anderson Street. No access is proposed from Bunnerong Road.
All existing driveways on Bunnerong Road are to be removed and replaced with integral kerb and guttering as per TfNSW requirements.	Noted. To be addressed as part of any future development application.
Consideration should be given to implement measures to reducing the reliability on car usage for residential units in areas well serviced by public transport options such as the location of the subject site.	To be considered as part of a Transport Impact Assessment at the development application stage.

Issue raised	Response
<p>Swept paths plans should be submitted to Council demonstrating the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site in forward direction and are able to manoeuvre through the site, and internal roads (with parked vehicles) in accordance with Austroads requirements. The swept path analysis should include details of lane lines, kerb & gutter, and centre lines.</p>	<p>To be addressed as part of any future development application.</p>
<p>The site is optimally located within walking distance of public transport including high frequency bus services on Bunnerong Road and light rail services at Kingsford Junior Light Rail stop (approximately 350m away) and the Kingsford town centre. Transport therefore requests consideration is to be given to the introduction of maximum parking rate provision, in particular for private use to encourage the mode shift to public and active transport modes in the locality.</p>	<p>The site is highly accessible and located in close proximity to public transport.</p> <p>Council's HIA DCP includes reduced car parking rates which are proposed to apply. The rates in the Randwick HIA DCP are one-third less than the standard TfNSW rates and are consistent with the Kensington and Kingsford Town Centre rates and aim to minimise car parking in accessible areas and encourage mode shift.</p> <p>The indicative basement area in the reference scheme provides capacity for approximately 200 parking spaces, demonstrating that the proposal can comply with the reduced rates in the Randwick HIA DCP. The Housing SEPP also provides reduced parking rates which will apply to future development.</p> <p>The amount of car parking to be provided on the site will be determined as part of the detailed design phase. A detailed parking assessment will be undertaken at DA stage, based on the proposed apartment mix, tenure mix and applicable parking rates for the site.</p>
<p>Given the ambition and opportunity for people to walk to destinations and access nearby public transport connections, the development should consider TfNSW's Walking Space Guide to ensure improvements in walkability and permeability for pedestrians to ensure adequate walking, buffer and waiting space, considering the projected growth.</p>	<p>To be considered as part of any future development application.</p>

4 Conclusion

This Submissions Report has been prepared to respond to matters raised in submissions in response to the exhibition of the SAPP for 47-55 Bunnerong Road, Kingsford.

This Report responds to and addresses all issues raised in Randwick Council's submission and additional matters raised in public submissions.

The planning proposal will deliver increased housing supply, new and improved social housing, and more diverse housing options, consistent with State and local government objectives to increase the supply of housing, including social housing, in accessible locations.

The proposal ensures all impacts can be appropriately managed and mitigated and aligns with the current and planned built form context of Kingsford - an area identified for housing growth area and significant renewal and transformation.

This Submissions Report addresses all matters raised in submissions, and the planning proposal can now be finalised in accordance with the accelerated assessment timeframes for social and affordable housing rezonings, and Section 3.36 of the Environmental Planning and Assessment Act 1979.