

Appendix B1 – Detailed Response to Submissions Table – Additional Matters

These tables below provide a summary response to further issues raised by DPPI on 30th of September 2025 following a meeting between the Department and the Proponent. Each item is cross referenced to where each issue is addressed in further detail in the Response to Submissions (RTS) report or addendum, prepared by Ethos Urban (now Colliers Urban Planning).

1.1 Department of Planning, Housing and Infrastructure

Table 1 DPPI Matters

Summary of Matters Raised	Response
Height of Building	
<ul style="list-style-type: none"> Clarify maximum height of the proposal, as the project description in the EIS identified the height of the building as RL106.8, but the RtS includes elements that reach RL107.8m. 	<ul style="list-style-type: none"> The building's maximum height remains at RL106.8m, consistent with the project description in the Submissions Report. The reference to RL107.8m in the RtS reflects the inclusion of minor rooftop elements such as roof cowls and lightning rods, which are required for functional and safety purposes. These elements are not considered part of the "building height" under the definition in the Randwick LEP, which is: <ul style="list-style-type: none"> <i>building height (or height of building) means—</i> <i>(a) in relation to the height of a building in metres—the vertical distance from ground level (existing) to the highest point of the building, or</i> <i>(b) in relation to the RL of a building—the vertical distance from the Australian Height Datum to the highest point of the building,</i> <i>including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.</i> Roof cowls and lightning rods are considered comparable to these excluded elements and therefore do not contribute to the building height for planning assessment purposes. The overall height (RL107.8m) has nonetheless been advised to Sydney Airport to ensure compliance with obstacle limitation surfaces and other aviation safety requirements. In any case, these minor rooftop elements are unlikely to result in any perceptible visual or overshadowing impacts beyond those already assessed in the EIS.
Community Consultation	
<ul style="list-style-type: none"> Provide details of how many people were home and how many people were spoken with in relation to the doorknock that was undertaken on Monday 	<ul style="list-style-type: none"> The door knock on 21st July was undertaken by the Ethos Urban (now Colliers Urban Planning) SIA author, a UNSW representative and a Architectus representative. The express

(21/06/25). Provide details of any feedback received from the community during these discussions.

purpose of the door knock was to inform both the VIA (and seek permission to take further photography) and invite stakeholders for one-on-one sessions to further inform the SIA addendum. It is estimated approx. 30% of all participants (7) had a one-to-one discussion during the door knock. It is important to note that only two people took up that offer for one-on-one sessions to further provide information on social impacts and instead preferred a group session. Details of those one-on-one meetings and the group meeting/session are included in the SIA addendum found in **RTS Appendix G**.

- There were some (limited) discussions held as part of the door knock process to discuss the planning process, solar access and construction impacts.

Emerging Character

- Remove reference to B22 building in relation to existing and emerging character of the campus as the Department understands that this consent has lapsed.
- Reference to Building B22 has been removed in the documentation. It is acknowledged that the consent for this building has lapsed.

Signage Plans

- Address matters raised in the Department's email on 1 September 2025 regarding the signage plans.
- The signage plans have been updated in accordance with the Department's email dated 1 September 2025, as shown in **RTS Appendix C**. Dimensions for all signage zones are now clearly shown on the elevations, with references to 'TBC' and 'nominal' removed. Each signage zone, including any associated logo areas (e.g. SIN01), has been labelled with confirmed dimensions and locations for approval.

Car Parking

- Clarify whether there are 10 or nine car spaces proposed for G25 as the plans illustrate nine but 'Appendix A – Detailed Response to Submissions table' identifies 10 spaces.

	AGSM Loading Dock			H25 Botany Car Park			G25 Car Park			TOTAL		
	Existing	Proposed	Change	Existing	Proposed	Change	Existing	Proposed	Change	Existing	Proposed	Change
B99	8	4	-4	1,050	1,029	-21	64	10	-54	1,122	1,043	-79
SRV	0	0	-	0	0	-	0	2	+2	0	2	+2

- 16 spaces are proposed within the G25 development as shown in **RTS Appendix N** including:
 - 4 Spaces for the AGSM
 - 12 Spaces for the G25 Building (inclusive of 10 B99 Car Parking Spaces and 2 SRV Spaces)

- During the meeting on 18 September 2025, there was discussion on construction worker parking and on the growth in the number of students that can be accommodated on the campus because of the development. You are requested to address these concerns.
- UNSW staff and construction workers each have different travel preferences, and their habits are influenced by a myriad of factors, such as public transport and parking availability and costs, and for construction workers, the requirement for projects to implement an approved Construction Worker Transport Strategy (CWTS) referenced by condition/s of development consent.
- A CWTS has been prepared as found in **RTS Appendix M** to provide specific measures for managing construction worker travel, including the following mitigation measures:
 - On-Site and Nearby Parking Provision: Construction workers will be able to use the Botany Street and Barker Street multi-storey car parks, which are close to the G25 and E25 project

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- sites. UNSW has secured additional parking at the Royal Randwick Racecourse multi-storey car park in liaison with the Australian Turf Club (ATC) to further reduce demand on local streets.
- Restricted Parking Zone: A restricted parking zone (RPZ) will be established around the project site, covering Oval Lane, Hospital Road, Barker Street, and Willis Street.
 - o Measures to enforce the RPZ: Clauses in the head contract to prevent construction workers from parking in these streets.
 - o Temporary signage (installed with Council approval, at no cost to Council) to reinforce the parking restriction, removed after construction completion.
 - o Letterbox drop to residents within the RPZ, providing project details and a contact email to report any non-compliant worker parking.
 - Site Induction Requirements:
 - All contractor and subcontractor staff must undergo a site induction before commencing work. Induction will include:
 - o Public transport options for site access.
 - o Information on approved parking locations within UNSW (e.g., Barker Street car park).
 - o Clear instruction that parking in surrounding residential streets is prohibited.
 - Support for Public Transport Use: Arrangements will be provided for equipment/tool storage and drop-off requirements to facilitate workers using public transport rather than private vehicles.
 - Ongoing Community Engagement: The contractor will maintain regular communication with the local community, establishing a channel for residents to raise issues about traffic, parking, driveway access, or other construction impacts.
 - Real-Time Parking Information: UNSW will upgrade totem signage at Gate 11 (Botany Street) and Gate 14 (Barker Street) to display real-time information about available car park spaces in both parking stations for staff and the public.
- It is understood that similar projects would have been required to ensure compliance with the approved relevant management plans specifying construction vehicle access routes and worker access arrangements such as the following, and the same would apply in this case:
 - HTH:
 - o <https://cms.plenary.com/app/uploads/2023/07/Construction-Worker-Transport-Strategy.pdf>
 - o <https://plenary.com/project/health-translation-hub>
 - Integrated Acute Services Building:
 - o SSD-9113 (main building) - <https://www.nsw.gov.au/sites/default/files/noindex/resources/rcr-ssd-9113-pow-hospital-asb-construct-worker-transpt-strat.pdf>
 - o SSD-10339 (addition) - <https://www.nsw.gov.au/sites/default/files/noindex/resources/rcr-ssd-10339-iasb-constructionworkertransportationstrategy.pdf>
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- Additionally, a distinguishing factor in relation to the subject-proposed development is that it is located at the UNSW Kensington Campus, where UNSW operates its parking as a Parking Authority given powers under the Road Transport Act 2013 and associated legislation and guidelines. Under this regime, UNSW is able to control and adjust the parking regime that applies on campus and enforces its parking rules and issues fines or warnings under this legislation.

Green Roof

- Confirm whether the 'green roof' on the rooftop level will be accessible to users of the development.
- The green roof at the rooftop level is not accessible to the public. Access will be restricted to maintenance personnel only.

Aerospace Requirements

- Correct the requirements regarding controlled activity approval, which is assessed and issued by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCA). The requirements outlined in the EIS's Aeronautical Impact Assessment Report, as stated in 'Appendix A – Detailed Response to Submissions table' are not relevant given that DITRDCA is the relevant Commonwealth body. Please note that the Department will not determine this application without either the controlled activity approval or advice from DITRDCA that it has no objection to the development as per the requirements of Randwick LEP. We will progress our assessment to draft conditions but will not determine the application until that time
- DITRDCA has confirmed approval of the building height at RL107.8 m AHD as shown in The Controlled Activity Approval at **RTS Appendix K**, satisfying the relevant Commonwealth requirements. As a result, draft conditions relating to controlled activity approval are no longer required.

Flooding

- Provide details of the UNSW Emergency Response Plan for a flood emergency and how it addresses the 'Shelter in place guideline for flash flooding', where relevant, or identify if there is an alternative safe evacuation route during the PMF
- Considering the G25 development is deemed a low flood risk, with hazardous flood conditions within the adjacent driveway likely to be present for a short period of time during extreme rainfall events, the EMP is deemed appropriate for the G25 development. The UNSW Emergency Response Plan (supplied at **RTS Appendix L**) addresses the practical refuge location for people within a building, noting the G25 building provides suitable refuge locations above the PMF in the event of extreme rainfall, and minor overland flooding external to the building will only last for a short duration of time and recede within minutes of rainfall ceasing.

SEARs Envelope Reference

- Remove references to the 'SEARs envelope'. SEARs does not involve an assessment of the proposal, as such any height indicated at SEARs stage is irrelevant and has no weight to the assessment. Further, the envelope shown as 'SEARs envelope' has already been discussed in the EIS. Focus on changes from the EIS to the RTS
- References to the 'SEARs envelope' have been removed from all documentation and a focus on design changes from the EIS to RTS reporting has been made in this RTS package.

Administrative Matters

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| <ul style="list-style-type: none"> • Please also check cross-referencing in the document and ensure any 'draft' watermarks and internal review comments are removed for the final submission. | <ul style="list-style-type: none"> • The document has been reviewed for accuracy of cross-references. All 'draft' watermarks and internal review comments have been removed to ensure the final submission is clean and ready for lodgement. |
| <ul style="list-style-type: none"> • The Department's review of the draft RtS relates to adequacy of information provided and is not our merit assessment of the issues. Additional matters may be raised throughout the assessment phase, as needed. | <ul style="list-style-type: none"> • Noted. |

Solar Access

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| <ul style="list-style-type: none"> • The Department acknowledges that the Randwick DCP is being considered for guidance on overshadowing impacts despite it not strictly applying to SSD projects. The controls within Part C1 provide useful background, however, the controls within Part E2 should also be considered as these were written specifically for the UNSW site.
s) Solar access to living areas and principal landscaped spaces of adjoining residential development is not to be reduced to less than 3 hours per day throughout the year. If 3 hours per day is not currently achieved, new development must not reduce this further. | <ul style="list-style-type: none"> • The revised Solar Access studies have included an assessment against the relevant controls of both part C1 and E2 of the DCP, as detailed in the RTS report. • Notwithstanding this, we note that DCP's do not apply to SSD applications having regard to clause 2.10 of State Environmental Planning Policy (Planning Systems) 2021 |
| <ul style="list-style-type: none"> • Confirming these properties are the properties of concern that the Department has identified through its preliminary analysis of documentation provided. Further information, as requested in our meeting, is required to verify the inputs in the Shadow Studies Summary. | <ul style="list-style-type: none"> • The Department flagged that the following nine (9) relevant properties (the relevant properties) were a subject of issue, for detailed analysis in the solar/overshadowing analysis: <ul style="list-style-type: none"> - 14 Norton Street - 16 Norton Street - 22 Norton Street - 22A Norton Street - 24 Norton Street - 24A Norton Street - 30 Norton Street - 32 Norton Street - 40 Botany Street. • Further information has been provided in the Design Report Addendum found in RTS Appendix D and as discussed in the RTS report. |
| <ul style="list-style-type: none"> • The Department has observed that the 8am and 4pm shadows are very long and none of the properties of concern receive sunlight at these times currently. If solar access at 8am and 4pm is demonstrated and is relevant to your assessment, it may be appropriate to include these times. | <ul style="list-style-type: none"> • The hours of 8am to 4pm have been assessed as part of the proposed development. |
| <ul style="list-style-type: none"> • The definition of private open space from the Randwick LEP is appropriate. | <ul style="list-style-type: none"> • Noted regarding the definition of Private Open Space and it is noted that Passive Recreation Activities is defined within the RtS Report (see Section 4.2.1). |

- Please clarify what your definition of 'areas capable of supporting passive recreation activities' is. No clear definition is provided in Attachment 2. If you are referring to the 1sqm approach, please see comment below.

- There is no need to consider solar panels at 34 Norton Street if they do not have any solar panels installed.

- Noted.

- The Department will be undertaking a merit assessment of overshadowing. The windows on elevations other than the north elevation may be relevant for certain properties. You are encouraged to consider other windows if they will be relevant to your assessment of solar access. The Department notes that due to the orientation of most dwellings, it is unlikely that other windows would need to be considered for many of the properties. It is recommended some rigour is applied to the photography methodology to ensure building features can be transferred onto plans as accurately as possible. Some camera lenses may distort the size and location of building features.

- The methodology regarding the impacts to the northern elevation is provided in the RtS Report (see **Section 4.2.2.**)
- The methodology includes multiple sources of data including Development Application approval documentation, a site visit, real estate data and high-resolution imagery to determine what portions of the rear-facing elevations are to be assessed in the solar access study.

- The Department does not consider this to be an appropriate test. This design guidance from the ADG does not state this is how an hour of sun should be measured. Further, this was written for a very different context, being high density apartments rather than low density residential dwellings.

- Noted. The design guidance from the ADG has not been further considered with respect to the solar assessment.

- Accurate and detailed shadow diagrams should be prepared as a starting point. This will allow a merit assessment to occur that takes into consideration the context and constraints of each property. Providing an estimate of the quantum retained and for what timeframe compared to quantum lost, particularly where only a small number is retained, would provide context for the Department's assessment (i.e. where 1sqm for two hours is retained for an open space area that only received solar access to 4sqm for two hours of the day pre-development varies considerably if compared to a property that received solar access for 40sqm for five hours).

- Instead, an assessment based on merit aligned with the Department's advice has been undertaken for the three properties that do not achieve the private open space minimum 3 hours solar access in the worst-case scenario (mid-winter). A merit assessment for these properties, which covers the quantum of solar access to private open space retained/reduced and timeframes, is included in the Design Report Addendum found in **RTS Appendix D** and is discussed in the RTS report.