

The logo for URBIS, featuring the word "URBIS" in a bold, sans-serif font. The letters "U", "R", and "B" are positioned to the left of a square frame, while the letters "I" and "S" are inside the frame. A thick vertical line runs down the left side of the page, and a thick horizontal line runs across the top, intersecting at the top-left corner of the square frame.

URBIS

SSD-77175998 – 194-214 OXFORD STREET & 2 NELSON STREET, BONDI JUNCTION

Response to Submissions Report

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P0051573
Report Number	FINAL_September



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

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1. INTRODUCTION

This Response to Submissions (**RtS**) report relates to the proposed development at 194-214 Oxford Street & 2 Nelson Street, Bondi Junction (**the site**). On behalf of Westgate BJ Pty Ltd (**the applicant**), this Response to Submissions Report has been prepared to address the matters raised by public agencies, Waverley Council (**Council**), community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning, Housing and Industry (**DPHI**) in April 2025 (SSD-77175998). The SSDA was placed on public exhibition for 28 days between Wednesday 30 April 2025 and Tuesday 27 May 2025.

This RtS Report has been prepared in accordance with the DPHI State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) March 2024.

1.1. EXHIBITED PROJECT

The SSDA (as lodged) sought consent for:

Proposed New Works:

- Construction of Levels 9 – 16 of the residential towers including Buildings A (Western Tower) and Building B (Eastern Tower) comprising:
 - Building A (Western Tower, Residential Levels 9 -13) – with a maximum height of 42.5m
 - Building B (Eastern Tower, Residential Levels 9 -16) – with a maximum height of 54.0m
 - Communal open space on Level 11 (Building A)
 - Plant and lift overrun
 - Public Domain Works
- Internal fit out of Levels 09 - 16

Proposed Amendments to Existing Parent Development Consent:

- Internal fit out from Basement Levels 01 - 04
- Internal fit out from Ground Level to Level 08
- The allocation of 1,709 m² of affordable housing on Levels 1,2 and 3 of Building A and Building B, equating to 17 affordable housing apartments
- Additional services to overall development including an additional plant area at ground floor and an addition of a second substation
- Basement services, including additional parking spaces and updated storage and waste storage areas
- Awning over the ground level retail along Oxford St and addition of a glazing window to create visual continuation from the neighbouring retail

Cumulative Development (Existing Parent Development Consent and Subject SSDA)

- Construction of a shop-top housing development, comprising a podium with ground floor retail, two residential towers (Building A and Building B) as well as four levels of basement parking and associated public domain works.
 - The delivery of a total of 11,288m² of GFA.
 - 467m² of retail GFA.
 - 85 apartments, equating to a total residential GFA of 10,792m² including 1,709m² (17 apartments) of affordable housing GFA.
 - 29m² GFA for communal amenities, incl. WC, steam room and sauna
 - The apartments will comprise the following mix:

- 1 bedroom 2 (2%)
- 2 bedroom 35 (42%)
- 3 bedroom 48 (56%)
- 4 levels of basement for 138 car parking spaces and 45 motorbikes, with vehicular access from Osmund Lane.
- Storage areas and services.
- Communal open space and associated landscaping.

1.2. SUPPORTING DOCUMENTATION

This RtS report is supported by the following technical reports and documentation.

Appendix	Report	Prepared By
Appendix A	Updated Architectural Drawings	SJB
Appendix B	Updated BASIX Certificate	-
Appendix C	Updated ESD Report	Vipac
Appendix D	Updated Visual Impact Assessment	Keylan
Appendix E	EDC Report	Berco Consultants
Appendix F	Updated Transport Impact Assessment	Stantec
Appendix G	Additional Swept Path Analysis	Stantec
Appendix H	Stantec Response to Public Submissions	Stantec
Appendix I	Arboricultural Addendum Letter	Ezi Grow
Appendix J	Updated Pedestrian Wind Assessment	Vipac
Appendix K	Modification to Existing Development Consents	Urbis
Appendix L	Response to HNSW Comments	Urbis
Appendix M	EPBC Act Self-Assessment	Urbis
Appendix N	Updated Clause 4.6	Urbis
Appendix O	Loading Dock Management Plan	Stantec
Appendix P	Updated Accessibility Assessment	East Coast Accessibility
Appendix Q	DCCEEW Decision	DCCEEW
Appendix R	Heritage Peer Review	Weir Phillips

2. ANALYSIS OF SUBMISSIONS

The SSDA was publicly exhibited between Wednesday 30 April 2025 and Tuesday 27 May 2025. There were five (5) submissions received from government authorities (including DPHI and Council), one (1) submission from Greater Sydney Parklands, one (1) submission from Queens Park Precinct Executive Committee and 124 submissions received from members of the local community and individuals.

All submissions were managed by DPHI, which included registering and uploading the submissions onto the Major Projects website (SSD-77175998).

Overall, three (3) submissions support the project. This includes:

- **Greater Sydney Parklands:** a submission dated 25 May 2025, was received which raises no objection and identifies:
“Following review of the applicant’s site specific overshadowing study, I confirm that the approach to overshadowing in the application is considered reasonable as it results in a minor variation to the current approval and is consistent with the Study”
- **Two Public Submissions:** were received in support the project, identifying that the project provides housing in proximity to infrastructure including transport and amenities.

Transport for New South Wales (**TfNSW**) raises no objection to the project and raises an item for clarification relating to the approved developments under DA-400/2021 and DA-360/2023. The four (4) other submissions from government authorities raises items to be addressed through additional assessment and clarification including:

- **Building Height & Visual Impacts:** additional assessment to respond to concerns about height, visual impact and overshadowing impacts. This includes amendments to the Clause 4.6 variation statement.
- **Residential Amenity and Apartment Design Guide (ADG) Compliance:** additional assessment on the communal spaces, privacy and ADG compliance.
- **Compliance with Waverley Local Environmental Plan 2012 (LEP) and Waverley DCP 2022:** additional clarification on non-residential gross floor area (**GFA**), car parking and bicycle parking.
- **Voluntary Planning Agreement (VPA):** clarification on the VPA
- **Compliance with Relevant Australian Standards (AS):** additional assessment on the compliance with the relevant AS as it relates to parking spaces, bicycle parking and swept paths.
- **State Significant Development (SSD) Criteria:** clarification on meeting the SSD criteria.
- **Pedestrian Wind Assessment:** additional assessment required for the pedestrian wind assessment.
- **Heritage Assessment:** additional assessment of potential heritage impacts and compliance with the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) as it relates to the matter of national environmental significance (**MNES**) as it relates to the Centennial Park. Additional assessment for potential impacts to other State Heritage Register (**SHR**) listed items in vicinity to the site.

Overall, 122 submissions objected to the project. A summary of the key issues raised in the public submissions include:

- **Traffic and Infrastructure Concerns:**

The traffic study is outdated, based on COVID-era data, highlighting a need for updated traffic data and a comprehensive traffic impact assessment. Existing traffic congestion on Oxford Street and surrounding intersections is a significant concern. There is a strain on infrastructure, including sewage, transport, healthcare, and emergency access. Insufficient parking provision is leading to increased on-street parking pressure, and there are concerns over pedestrian and cyclist safety, especially for children.

- **Community and Consultation:**

There is a lack of meaningful community consultation and engagement, with long-term community opposition being overlooked. Calls for better urban design and greater community involvement in planning processes are prevalent.

- **Affordable Housing and Development:**

While there is support for affordable housing, there are concerns over the use of affordable housing provisions to justify height increases. Proposals include rent caps tied to wages and longer-term commitments to affordable housing. Questions arise about the genuine affordability and long-term benefits of the proposed affordable housing units.

- **Height, Bulk, and Visual Impact:**

There are objections to the proposed height increase, which is up to 57% over LEP limits. Concerns include the visual impact on the skyline, overshadowing, and loss of natural light. The height and bulk are seen as excessive and out of character with the surrounding low-rise, heritage areas. There is significant visual intrusion on important heritage sites, including Centennial Park and the Mill Hill Conservation Area.

- **Environmental and Heritage Concerns:**

The development is viewed as having a negative impact on the heritage and visual amenity of Centennial Park, a nationally significant site. Potential environmental degradation includes impacts on local biodiversity and heritage trees. The proposal is seen as incompatible with local heritage conservation goals and planning controls.

- **Precedent and Planning Integrity:**

There are concerns about setting a precedent for future overdevelopment. Some believe developers are exploiting planning loopholes and prioritising profit over community interest. Calls are made for adherence to existing planning controls and rejection of proposals that exceed height and density limits.

- **Sustainability and Design:**

There are calls for more green spaces, communal areas, and sustainable design practices. Recommendations include increased bike parking and car-share spaces over private parking.

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submission, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 3**.

3.1. REFINEMENTS TO THE PROJECT

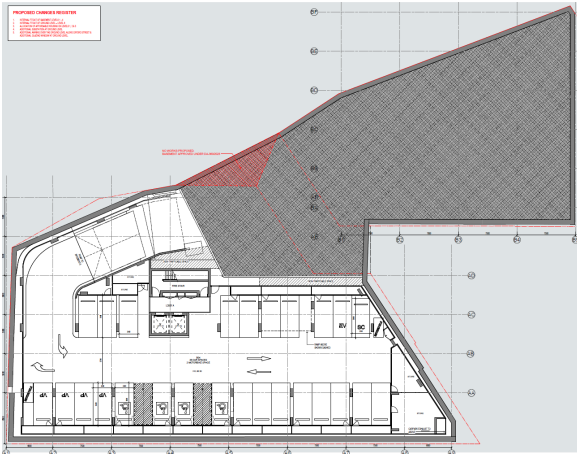
Table 1 summarises the refinements and clarifications proposed since public exhibition and in response to the submissions made.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

Table 1 Overview of Refinements to the Project

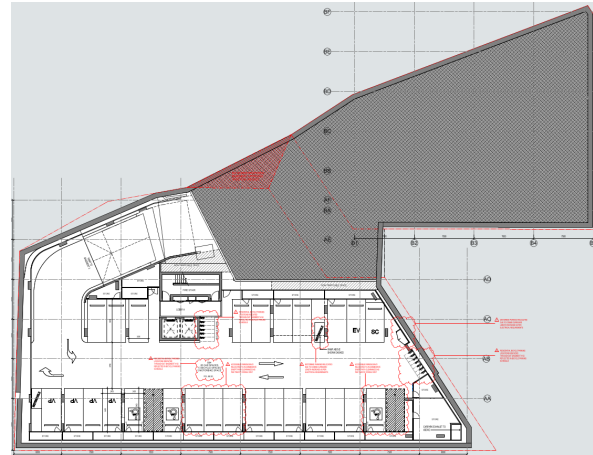
Overview of Refinements to the Project
Updates to Basement Parking, Storage as well as Bicycle Parking
Updates were made across Basement Levels 1, 2, 3, 4 as well as the ground level with the main objectives of refining the development design to address the following:
▪ Provide Bicycle Parking Consistent with the DCP Requirement: in accordance with the Waverley DCP bicycle parking rates (under Section 7.2.6 of the Waverley DCP, 97 bicycle parking spaces are required), updates have been made across the basement and ground levels to deliver a total of 98 bicycle parking spaces. This includes: – 13 bicycle spaces at Basement Level 4 – 28 bicycle spaces at Basement Level 3 – 28 bicycle spaces at Basement Level 2 – 29 bicycle spaces at Ground Level ▪ Updates to Basement Layout to ensure compliance with the relevant Australian Standards and Swept Path requirements. ▪ Continued Provision of Appropriate Storage Areas (Basement) and Car Parking Spaces: in tandem with changes to the basement layout to address the above, the updates to the basement levels maintains the same total number of car parking spaces and provides the required quantum of storage space. It is noted that in the updates to the basement layout, the updated basement will provide 25 accessible parking spaces in lieu of 28 in the previous revision, however, this was as there was a surplus of 3 accessible parking spaces, and the proposed 25 accessible parking spaces complies with the NCC 2022 accessible parking requirements. Similarly, the provision of motorbike parking remains the same.
Accessibility Refinements
Detailed design refinements have been made across the communal spaces of the building in accordance with the recommendations of the Access Assessment Report prepared by East Coast Accessibility Pty Ltd. Further detail of how these design refinements have been made to address the accessibility requirements is provided at Section 5 of this Rts report.
Norfolk Pine Tree
During the assessment period for this SSDA, the existing Norfolk Pine Tree was found to be dead and decaying after it was struck by lightning. The tree had failed at its base and was considered to dangerously overhang Syd Enfield Drive. As such, immediate removal of the Norfolk Pine Tree was required and the tree was approved to be removed and replaced as part of the development consent, DA-400/2021/E (approved 29 May 2025). As such, this SSDA has been updated to be consistent with the approval for the planting of a mature 800L Norfolk Island Pine at a similar location as the original, Norfolk Pine Tree.

Figure 1 Update to Basement Level 4



Picture 1 Exhibited Basement Level 4

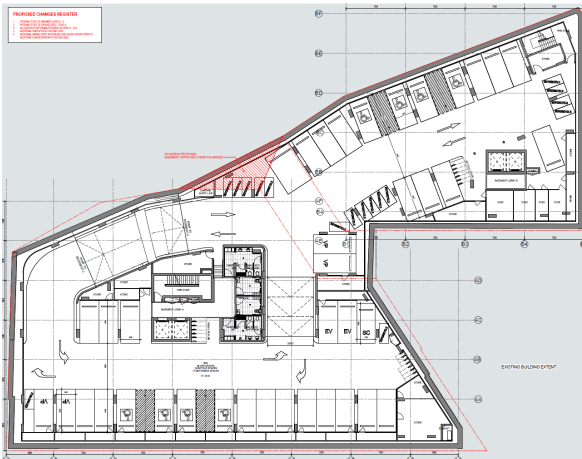
Source: SJB



Picture 2 Updated Basement Level 4

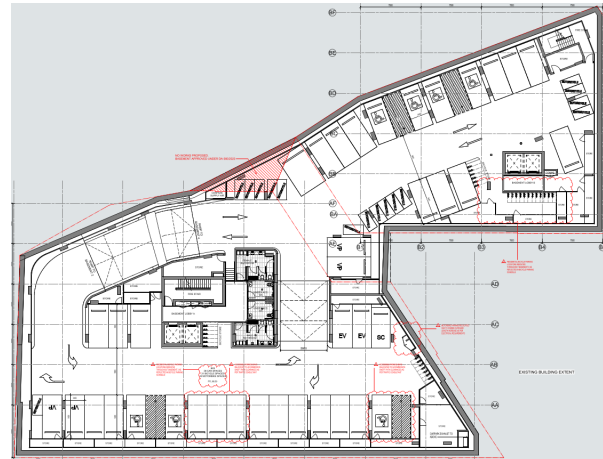
Source: SJB

Figure 2 Update to Basement Level 3



Picture 3 Exhibited Basement Level 3

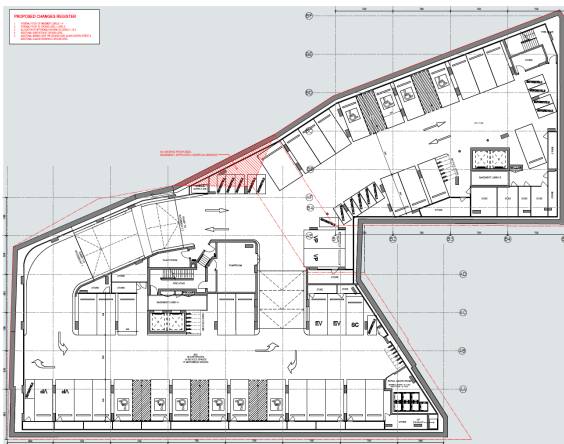
Source: SJB



Picture 4 Updated Basement Level 3

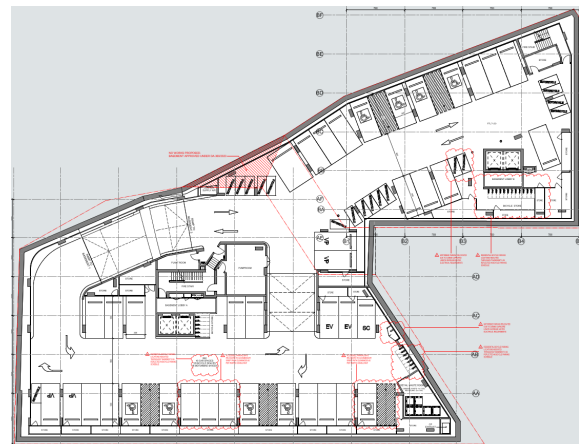
Source: SJB

Figure 3 Update to Basement Level 2



Picture 5 Exhibited Basement Level 2

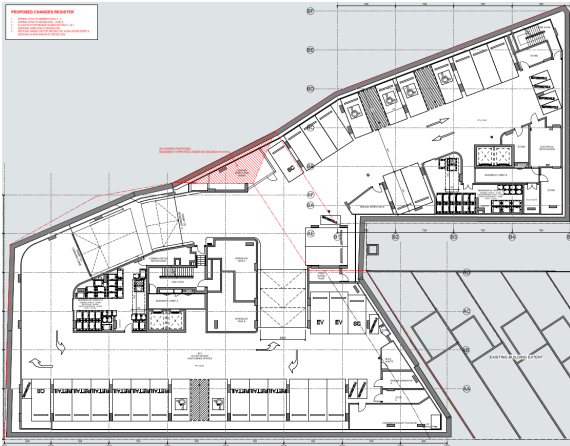
Source: SJB



Picture 6 Updated Basement Level 2

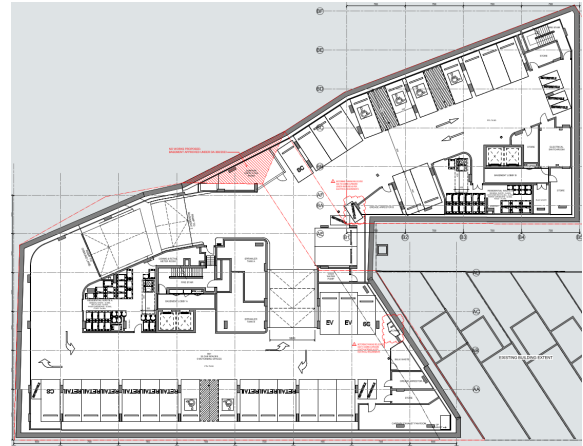
Source: SJB

Figure 4 Update to Basement Level 1



Picture 7 Exhibited Basement Level 1

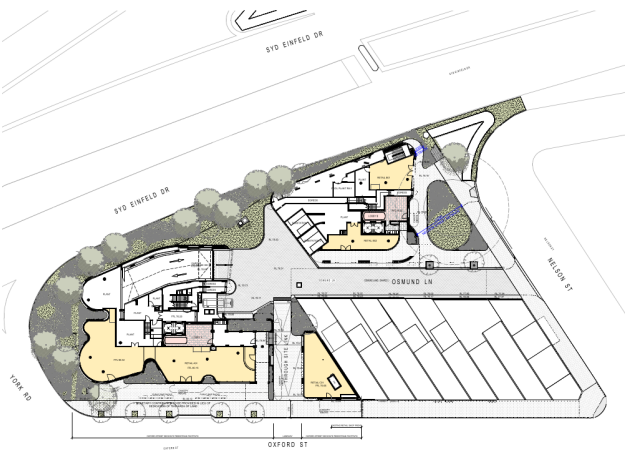
Source: SJB



Picture 8 Updated Basement Level 1

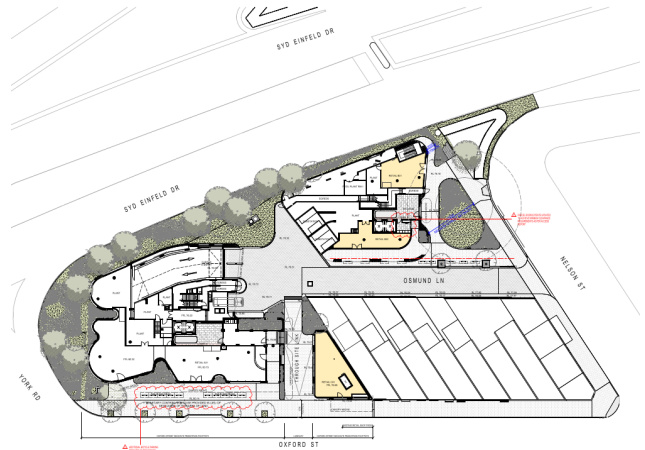
Source: SJB

Figure 5 Update to Ground Level



Picture 9 Exhibited Ground Level

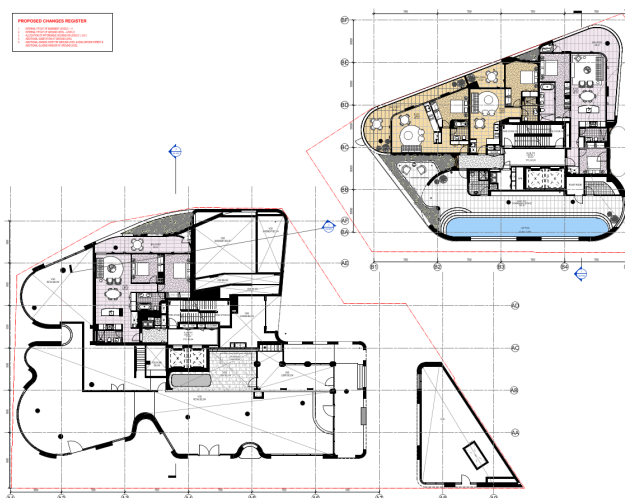
Source: SJB



Picture 10 Updated Ground Level

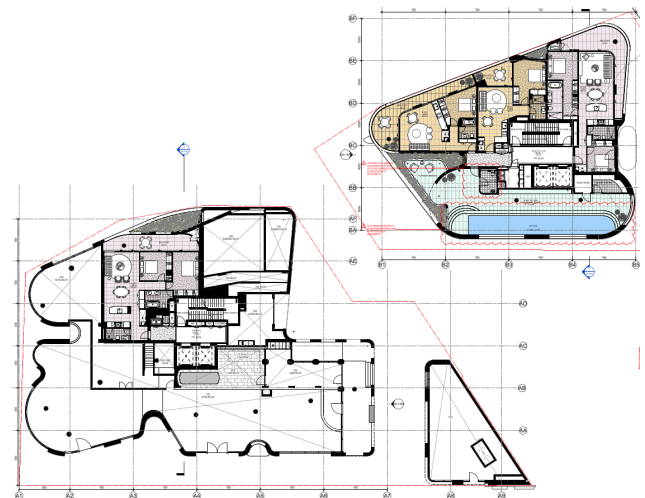
Source: SJB

Figure 6 Update to Level 01



Picture 11 Exhibited Level 01

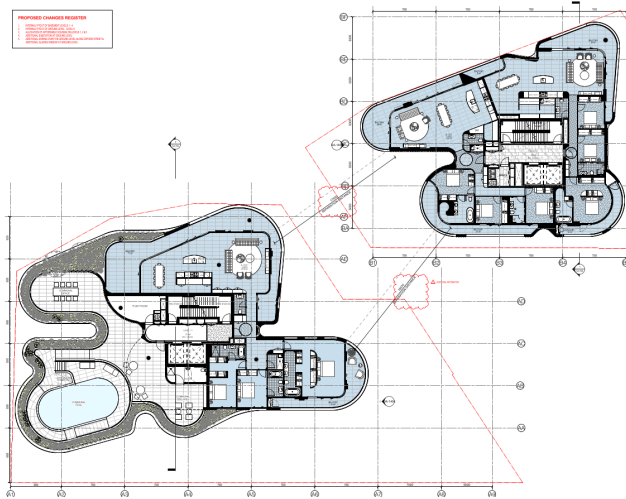
Source: SJB



Picture 12 Updated Level 01

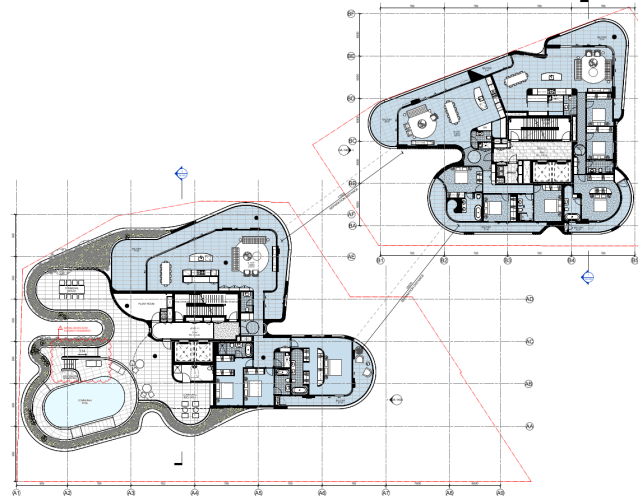
Source: SJB

Figure 7 Update to Level 11



Picture 13 Exhibited Level 11

Source: SJB



Picture 14 Updated Level 11

Source: SJB

4. UPDATED ASSESSMENT OF KEY IMPACTS

This section provides an updated justification and evaluation of the project as a whole.

4.1. VISUAL IMPACT ASSESSMENT AND HERITAGE IMPACT ASSESSMENT

The Visual Impact Assessment prepared by Keylan has been updated to:

- Provide a more accurate view impact assessment of the proposal, which seeks consent for a built form over the approved parent consent. The view impact assessment includes an of the proposal in comparison to the approved built form, providing greater clarity on the exact scope of impacts generated by this SSDA.
- Include additional views and view analysis that demonstrates the level of impact generated by the proposal on the neighbouring Centennial Parklands and other key views of heritage significance.

4.1.1. Updated View Analysis of Viewpoints 1 to 6

As noted above, the visual render analysis for Viewpoints 1 to 6 have been updated to compare the built form of the approved and proposed built form. Extracts of these updated view renders are provided below:

Figure 8 Updated Viewpoint Analysis



Figure 15: Viewpoint 1 – existing (approved under the Consent) (Source: SJB)



Figure 19: Viewpoint 2 – existing (approved under the Consent) (Source: SJB)



Figure 22: Viewpoint 3 – existing (approved under the Consent) (Source: SJB)



Figure 16: Viewpoint 1 – proposed view (Source: SJB)



Figure 20: Viewpoint 2 – proposed view (Source: SJB)



Figure 23: Viewpoint 3 – proposed view (Source: SJB)



Figure 27: Viewpoint 4 – existing (approved under the Consent) (Source: SJB)



Figure 30: Viewpoint 5 – existing (approved under the Consent) (Source: SJB)



Figure 33: Viewpoint 6 – existing (approved under the Consent) (Source: SJB)



Figure 28: Viewpoint 4 – proposed view (Source: SJB)



Figure 31: Viewpoint 5 – proposed view (Source: SJB)



Figure 34: Viewpoint 6 – proposed view (Source: SJB)

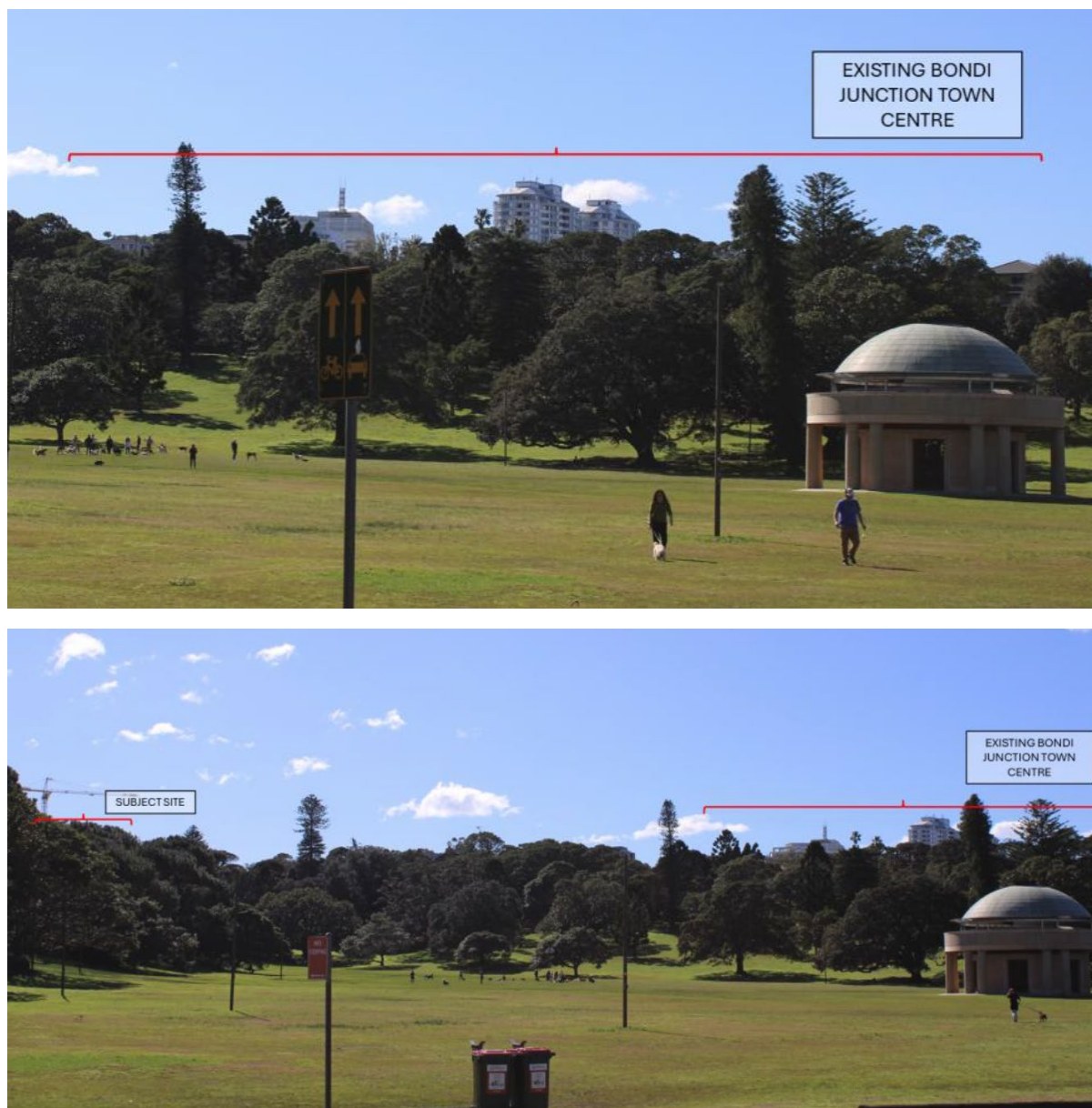
Subject to the updated visual impact assessment, further heritage assessment could be extrapolated as follows:

- **Viewpoint 1:** The view towards the site from the Intersection of Syd Einfeld Drive, Oxford and Wallis Street is of little heritage significance. The proposal will have no additional visual impact on this view. As approved, the proposal was visible, and the increase in built form, while visible, forms part of the wider built form context and will not result in an increased impact.
- **Viewpoint 2:** The view to the north along York Road along the eastern boundary of Centennial Park is of little heritage significance. The proposal will have no additional visual impact on this view. As approved, the proposal was visible, and the increase in built form will not detrimentally impact the views to the north along the eastern boundary of Centennial Park.
- **Viewpoint 3:** The sweeping views across the parklands, including the views to the north-east from Grand Drive, are of exceptional significance. The additional visual impact, as a result of the proposal, will be moderate due the additional storeys which are visible above the tree line. The proposal as approved was visible from this vantage point, and the limited increase in built form therefore results in a moderate additional visual impact on the view from Grand Drive, Centennial Park. It is noted that the visual impact is contributed by the topography of the site, being on the ridgeline of Oxford Street.

It is considered that any redevelopment of the site, seeking to maximise the built form would likely be visible from this viewpoint. It is also noted that the proposed, stepped tower form had been designed to protect the solar access to Centennial Park while achieving the target, 30% uplift in FSR and affordable housing provision. In April 2024 during the consultation session, Centennial Park Trust feedback from with Centennial State Trust (the Trust) highlighted the importance of protecting solar access. An options analysis of eight (8) design options were prepared to identify alternative designs that respond to solar access requirements for Centennial Park. These options were presented to DPHI on 23 May 2024, identified the preferred options which result in no additional overshadowing at the 'no additional impact' area, while delivering much needed GFA and affordable housing at the site. Subsequently, this has been further ratified by the submission made by Greater Sydney Parklands (dated 25 May 2025) following the public exhibition which *"confirm that the approach to overshadowing in the application is considered reasonable as it results in a minor variation to the current approval and is consistent with the Study"*.

Additionally, it must be noted that there several other built form structures (namely those forming the Bondi Junction Town Centre) visible from this location in Centennial Park. It is important to note that views and vistas within the Park are not unimpeded. Additionally, it is observed that there are several locations throughout the Park, particularly when looking towards the Federation Monument (I01) from Grand Drive, where built form elements are readily visible above the tree line. This is demonstrated in the figure below. Importantly, due to the basin-like topography of Centennial Park, views towards the Bondi Junction skyline are prevalent from various locations. These views may be impeded, obscured, or enhanced at different points within the Park, influenced both by Bondi Junction's ridgeline setting and the varying landscape and tree canopy surrounding the Park.

Figure 9 Existing Buildings Across Bondi Junction CBD Protruding over Tree line (Top) and it's Interface with the Site of the Proposal (Bottom)



Source: Keylan

Additionally, the Bondi Junction CBD is serviced and zoned for high density housing and is anticipated to undergo continued growth and development, the Bondi Junction CBD Vision and Masterplan recently initiating with the intent to support strategic development across the CBD.

- **Viewpoint 5:** This viewpoint is of little heritage significance. The proposal is not visible from this vantage point, and therefore, the additional height as proposed under the SSDA will result in no additional visual impact.
- **Viewpoint 6:** The views towards the subject site from this location are of little heritage significance. The proposal will have a minor, additional visual impact on this view. As approved, the proposal was visible and while the increase in height as part of the SSDA will result in an increase in built form, it forms part of the broader built context of the site, with a minor visual impact on the setting in overall terms.

Further to the additional heritage assessment commentary, it is noted that the overall rating of visual impact remains unchanged. The visual impact assessment concludes that the proposal results in a low – moderate impact across viewpoints 1 to 6 as summarised in the table below (outlined in red).

Reference	Viewpoint Location	Visual Sensitivity	Visual Compatibility	Magnitude of Impact	Overall Rating
EXISTING VIEWPOINTS – AS EXHIBITED AND CONSIDERED					
1	Intersection of Syd Einfeld Drive, Oxford and Wallis Street	Moderate	High	Minor	Low - moderate
2	York Road, Bondi Junction	Moderate	High	Minor	Low
3	Grand Drive, Centennial Park (within the park)	Moderate – High	Low	Moderate	Moderate
4	264 Oxford St, Bondi Junction NSW	Moderate	High	Moderate	Low - Moderate
5	Forth Street, Woollahra	Low	High	Minor	Low
6	Woods Avenue, Woollahra	Moderate – High	Low - Moderate	Moderate	Moderate

4.1.2. Additional Viewpoint Analysis and Heritage Assessment

Further to the viewpoints assessed as part of the exhibited view impact assessment, the updated assessment includes the following additional views:

- **Viewpoint 7: Junction of Queens Park Rd, View St and Victoria Street, Queens Park** - represents the view towards the proposal, from the junction of Queens Park Rd, View St and Victoria Street, Queens Park. This area is characterised by low-density residential properties, with an expansive view towards Queens Park and Centennial Park.
- **Viewpoint 8: The Column Garden, Centennial Park** - represents the view towards the proposal, from The Column Garden, Centennial Park.
- **Viewpoint 9: Centennial Park Reservoir WS001** - represents the view towards the proposal, from the Centennial Park Reservoir WS001, Centennial Park. This reservoir is a State heritage item (I02) within Centennial Park.
- **Viewpoint 10: Woollahra Reservoir, Centennial Park** - represents the view towards the proposal, adjacent to Woollahra Reservoir within Centennial Park, at 5R Oxford Street. This reservoir is a State heritage item (I03) within Centennial Park (heritage item 106153 and State heritage item SHR 01384).
- **Viewpoint 11: Mount Steel, Moore Park** - viewpoint represents the indicative view towards the subject site, from Mount Steele, Moore Park which is within the Moore Park, Queens Park State heritage conservation area (O1384) and Moore Park local conservation area (C36).

Figure 10 Additional Viewpoints



Source: Keylan

These additional views were prepared in co-ordination with Urbis in response to the comments received from Heritage NSW and DCCEEW. These comments, received during the exhibition period, identified a number of heritage items in vicinity to the site which would require further impact assessment, including further visual impact assessment. Therefore, the additional views, as seen in **Figure 9** above, provides additional visual impact in response to Heritage NSW's comments on 16 May 2025:

The proposed SSD is within the vicinity of the following State Heritage Register (SHR) items:

- Centennial Park, Moore Park, Queens Park (SHR no. 01384);
- Centennial Park Reservoir WS001 (SHR no. 01320);
- Woollahra Reservoir WS022 (SHR no. 01356); and
- Waimea House (SHR 00226)

Centennial Park is also listed on the National Heritage List (Place ID 106153).

The updated visual impact assessment informed the additional heritage assessment and commentary, all of which are provided across **Appendix D – Updated Visual Impact Assessment** and **Appendix L – Response to HNSW Comments**. This includes assessments of the statements of significance for these heritage items and the significant views and vistas associated with them. The outcomes of these additional assessments are summarised in the table below.

Existing View	Proposed View
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View 7

The visual impact from Viewpoint 7 is **low**. This is as:

- As indicated within the photomontages, the proposed development is introduced into the background. Importantly, the lower levels of the proposal are largely obscured by existing residential properties and mature vegetation.
- Although the additional storeys proposed are slightly more visible than those previously approved on the site, they remain visually compatible with the surrounding context, which includes several other multi-storey buildings forming the Bondi Junction skyline. The proposal is seamlessly integrated into the town centre, with other more prominent buildings including the Eastgate towers.
- Given this, and the substantial separation distance of the viewpoint, the magnitude of change to this viewpoint, as a result of the proposal, is considered low and the proposal is considered highly compatible.

Heritage Comment

- The view towards the subject site from Queens sandstone cliffs is of little significance. The proposal will have no additional visual impact on this view, due to the existing built form / character of the view with existing tower forms, and its long-range nature.



Picture 15 Approved View 7



Picture 16 Proposed View 7

View 8

The visual impact from Viewpoint 8 is **negligible**. This is as:

- As indicated within the photomontages, the approved development and the proposed development including additional storeys, are not visible from this viewpoint. Further, it is important to note that these levels are largely obscured by existing mature vegetation.

Heritage Comment

- The view across Centennial Park to the north-east along the Column Garden in Centennial Park is of exceptional significance. The proposal is not visible from this vantage point, and therefore, the additional height as proposed under the SSDA will result in no additional visual impact.

Existing View



Picture 17 Approved View 8

Proposed View



Picture 18 Proposed View 8

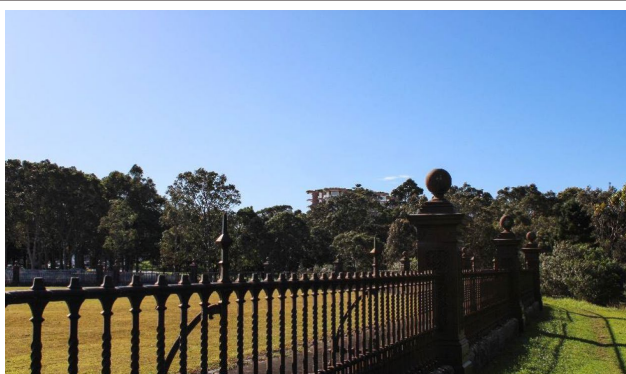
View 9

The visual impact from Viewpoint 9 is **moderate**. This is as:

- the existing view approved under the existing approval site is visible from this point with the approved development recognisable above the existing mature vegetation.
- It is important to note that the level of pedestrian footfall at this viewpoint is minimal, given the open space associated with the reservoir is gated and not publicly accessible nor is there an official designated footpath provided in this location. Therefore, it is not likely that many visitors will observe the proposed development from this viewpoint.
- While the additional storeys are more prominent than those previously approved on the site, the stepped design helps to soften their visual impact, echoing the natural variation in height and form of the surrounding tree line.
- From this viewpoint, other urban features are visible outside the park, including structures on Oxford Street, Bondi Junction. These existing structures contribute to the broader visual context and diminish the dominance of the proposal within the overall view.
- The proposal's high-quality design, particularly the variation in building heights (to compliment the proposed increase in height), materials and finishes are considered fundamental to ensuring a positive visual and built form outcome and ultimately minimising adverse visual impacts. Furthermore, the presence of trees will partially screen and soften the visual impacts of the new development from this viewpoint.

Heritage Comment

- The viewpoint is of exceptional significance.
- The additional visual impact, as a result of the proposal, will be minor due the additional storeys which are visible above the tree line. The proposal as approved was visible from this vantage point, and forms part of the high density built form in the area. The limited increase in built form results in a minor additional visual impact on the view from the Reservoir, however, would not impede on views and vistas from the reservoir to the rest of the Centennial Park.



Picture 19 Approved View 9



Picture 20 Proposed View 9

View 10

The visual impact from Viewpoint 10 is **low-moderate**. This is as:

- The approved proposal is highly visible from this location and therefore, the proposed development with additional height is also highly visible. It is important to note, foot traffic in this area is minimal due to its isolated location and the absence of formal pedestrian or vehicular access routes.

Existing View

Proposed View

- As indicated within the photomontages, the proposed development is introduced into the middle ground, with views limited towards the upper-level units. Further, it is important to note that lower levels are partially obscured by existing mature vegetation.
- While the additional storeys are more prominent than those previously approved on the site, the stepped design helps to soften the visual impact as well as the partial screening by mature trees. Importantly, from this viewpoint, the proposal would not impede or block any significant view currently obtained from this locality.
- For these reasons, the magnitude of change to this viewpoint is considered minor. Additionally, the proposed additional storeys are considered highly compatible given the approved development is highly visible from this setting.

Heritage Comment

- This viewpoint is of little heritage significance. The proposal will have no additional visual impact on this view. As approved, the proposal was highly visible and the increase in height as part of the SSDA does not generate any additional impact on the views from the Woollahra Reservoir.



Picture 21 Approved View 10



Picture 22 Proposed View 10

View 11

The visual impact from Viewpoint 6 is **negligible**. This is as:

- As indicated within the photomontages, the approved development and the proposed development including additional storeys, are not visible from this viewpoint. Further, it is important to note that any development on the subject site is obscured due to topography, long-range distance and existing mature vegetation.

Heritage Comment

- The view across Centennial Park to the north-east from Moore Park towards Centennial Park is of exceptional significance. The proposal is not visible from this vantage point, and therefore, the additional height as proposed under the SSDA will result in no additional visual impact.



Picture 23 Approved View 11



Picture 24 Proposed View 11

Overall, the additional viewpoint assessment concludes that the proposal results in a negligible – moderate impact across viewpoints 7 to 11 as summarised in the table below (outlined in red).

Reference	Viewpoint Location	Visual Sensitivity	Visual Compatibility	Magnitude of Impact	Overall Rating
ADDITIONAL VIEWPOINTS					
7	Junction of Queens Park Rd, View St and Victoria Street, Queens Park	Moderate	High	Low	Low
8	The Column Garden, Centennial Park	Moderate	N/A	N/A	Negligible
9	Woollahra Reservoir, Centennial Park	Moderate-High	Moderate	Moderate	Moderate
10	Woollahra Reservoir WS022, Centennial Park	Low	Moderate	Low-Moderate	Low-Moderate
11	Mount Steel, Moore Park	Moderate	N/A	N/A	Negligible

From a heritage perspective, the updated assessment concludes that:

- Increased visual impact and impact on setting as a result of the proposal are in general terms, neutral to minor across the majority of key views from surrounding SHR Items *Centennial Park*, *Moore Park*, *Queens Park* (SHR no. 01384), as well as from *Centennial Park Reservoir WS001* (SHR no. 01320) and *Waimea House* (SHR no. 00226). The additional visual impact generated from these views is limited, and will not result in adverse impacts on the SHR items.
- The main increase in visual impact as a result of the proposal occurs in one, select view from Grand Drive (within Centennial Park). This additional visual impact and impact on setting, as a result of the proposal, will be moderate due the additional storeys which are visible above the tree line. The proposal as approved was visible from this vantage point, and the limited increase in built form results in a moderate additional visual impact on the view from Grand Drive, Centennial Park.

4.1.3. National Heritage Significance Assessment

Further assessment of the impacts to the national heritage significance of the Centennial Park is provided at the EPBC Self-Assessment report at **Appendix M**. In summary, the proposal is consistent with the historic cultural heritage values of the *Centennial Park* (NHL Place ID 106153), namely, its outstanding heritage value to the nation because of the place's importance in the declaration of the Commonwealth of Australia (*Criterion A Events and Processes*). Key aspects of the assessment are listed below:

- No physical impacts would occur to the Nationally significant *Centennial Park* (NHL Place ID 106153), as the subject site is outside of the curtilage of the item. As such, the proposal would have no physical impact on the National heritage values of the heritage item.

- The main increase in visual impacts would occur to views to the north-east from the north-eastern section of *Centennial Park* (NHL Place ID 106153) in Federation Valley. The action would have a moderate effect on views which capture elements which express the National Heritage Value however it would be visible in the background of this view, would not obscure any of the elements. Note that aesthetic values associated with these items is not explicitly noted in the Office Value Statement.
- Overshadowing impacts are isolated to a small section of the north-eastern corner of *Centennial Park* (NHL Place ID 106153) that does not relate to the National Heritage value of the item. As such, the overshadowing would have an acceptable impact.
- The overshadowing and increase in visual effects resulting from the action would not result in the loss, degradation, damage, alteration, modification, obscuration or diminishment of the National Heritage values of *Centennial Park* (NHL Place ID 106153).

As such, the proposal is unlikely to have a significant impact on the National historic heritage values of the National Heritage place, *Centennial Park* (NHL Place ID 106153).

4.1.4. Assessment of Impacts to Federation Valley (Centennial Park)

During and following the exhibition period, Waverley City Council and the Heritage NSW Approval Committee (following an approval committee meeting 5 August 2025), have issued the following comments with regard to impacts to Federation Valley, located within Centennial Park:

HNSW Approval Committee Comment

The Heritage Council Approvals Committee requests Heritage NSW to write the Department of Planning, Housing and Infrastructure (DPHI) noting:

- 1. Advises that the Heritage Council does not support the grant of consent to the SSD application as it would adversely impact on the setting of Federation Valley, due to the proposed additional height and bulk disrupting a key vista, and the Federation Pavilion, which are highly significant elements/areas within the State Heritage Register (SHR) curtilage of Centennial Park, Moore Park, Queens Park (SHR 01384), and National Heritage List place ID 106153.*
- 2. Notes that the CMP policy under 'fabric and setting' states that Centennial Parklands needs an appropriate physical and visual curtilage including its skyline.*
- 3. Notes the existing approval for the site will result in a building above the tree line which is at the limit of an acceptable impact on Federation Valley.*

Council

The Centennial Parklands Conservation Management Plan, Section 5, Conservation Principles and Policies outlines that views to and from Centennial Parklands should be protected to maintain an appropriate physical and visual curtilage, including the skyline. This was a key element of the Planning Proposal for the site, which sought to minimise the visual impact of the site, when viewed from key points within Centennial Park (including the Federation Pavilion). The approved development is already visible above the tree line. This proposal further increases the height and visibility of the building above the tree line, exacerbating this issue and resulting in greater visual impact on views from Centennial Park.

In response to the above, we note that the Conservation Management Plan (CMP) does not graphically indicate the key views from the park. Instead, it notes that due to the park's location and relatively low-lying topography, the potential for expansive views is limited. The most notable views are within the park itself and from a few elevated areas, including Mount Steel, Queens Park cliffs, and Reservoir No.2. These viewpoints provide visual links to Botany Bay, the Blue Mountains, the city, and the surrounding heritage conservation area. Importantly, the proposed works will not interrupt these views.

It should also be considered that historical images of the Federation inauguration at the earlier Pavilion show spectators facing inward towards the Pavilion. While these lines of sight captured views behind the Pavilion, images available on the Trust and the Department of Climate Change, Energy, the Environment and Water websites demonstrate that buildings were already visible in the backdrop. These buildings broke the horizon and were visible in front. Historically, the Pavilion was a central focal point within a park setting amidst a developing urban environment. It was only later that the Pavilion benefitted from a denser landscape setting that blocked views of surrounding development.

Nevertheless, it is recognised that Federation Valley and the Federation Pavilion are key elements of significance within the park. Federation Valley provides an open landscaped setting for the reconstructed Pavilion, which is now viewed in a broader visual context rather than solely in the context of an event. While the Pavilion has always existed within a built environment (refer to the context imagery provided at **Section 4.1.1** of this RtS Report and **Appendix D**), it is agreed that surrounding development should not visually dominate this element. We have considered the following points in assessing that the proposed development does not unduly dominate Federation Valley:

- The development is visible in the same context as other high-density buildings in Bondi Junction, as shown in the views analysis. These buildings are seen behind the substantial landscape buffer provided within Centennial Park.
- Both buildings will feature curvilinear floor plans and facades that reference the colours and materials of the traditional brick buildings in the surrounding area.
- The proposed scheme includes rooftop greenery on both towers to enhance their streetscape presence, responding to the established greenery on-site and in the surrounding heritage items

Together, these considerations ensure that the proposed development respects and integrates with the park's historical and visual context, preserving its significance while accommodating thoughtful urban growth.

Additionally, it should be considered that the Centennial Park Master Plan 2040, with regard to Federation Valley, does not identify the strategic objective of maintaining views outwards, the Master Plan identifying the important views as views into the inner park and panoramic views over Centennial Park and the city to the south. Specifically with regard to Federation Valley, the Master Plan identifies the following objectives, which do not conflict with the proposal and the respective visual outcome:

- *Develop an interpretive overlay to educate visitors about the designed or 'natural' landscapes or places of environmental significance - Seek to reveal characteristic aspects of the 'natural landscape'*
- *Identify historically significant built fabric, for example the residences, perimeter fence or reservoirs*
- *Identify places of particular historical importance, for example Federation Pavilion*

A delegate of the Minister for the Environment and Water has decided that the project, "Shop top housing with infill affordable housing (EPBC 2025/10256)", is not a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The decision was received 19 September 2025, a copy attached at **Appendix Q**.

4.2. UPDATED TRAFFIC IMPACT ASSESSMENT

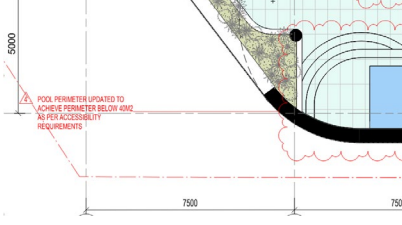
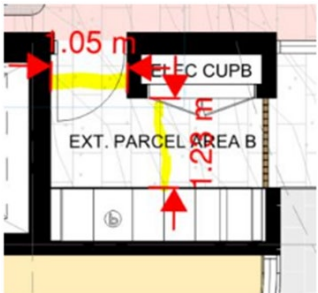
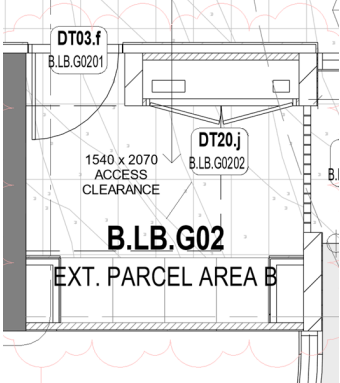
An updated Traffic Impact Assessment has been prepared by Stantec (**Appendix F**) which provides an updated assessment of the refined project, concluding that:

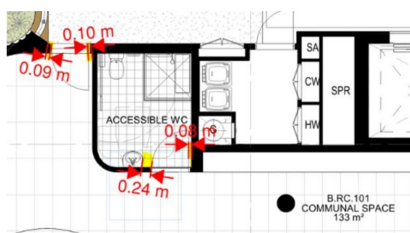
- **Accessible Parking:** the proposed 25 accessible parking spaces is compliant with the requirements under the NCC 2022.
- **Bicycle Parking:** the proposed 98 bicycle parking spaces is compliant with the requirements under the Waverley DCP 2022. The updated TIA also includes further assessment of the proposal and its alignment with Waverly Council's Bicycle Initiative, as detailed in Section 5.4 of the updated TIA (**Appendix F**).
- **End Bay Swept Paths:** Additional swept path analysis (**Appendix G**) has been prepared as part of the RtS package. The end bays and aisles are confirmed to be compliant with AS2890.1 requirements. Refer to attached swept paths analysis demonstrating ingress and egress of the end bay assessments at **Appendix G**.
- **Loading Dock Management:** a Loading Dock Management Plan (**LDMP**) (**Appendix O**) has been prepared by Stantec as part of this RtS package. The LDMP has been prepared to outline the operations of the proposed loading dock and provide guidance to the management team on the procedures and their responsibilities. The LDMP identifies the proposed loading dock, accessible via Osmund Lane and subject to AutoTURN vehicle simulation modelling, confirm that the loading dock can be accessed by the designated vehicles. The LDMP identifies the relevant vehicle routes, hours of operation, vehicle frequency, appointment & booking systems as well as the overall management guidelines (building manager responsibilities, security etc.) to ensure the loading dock can be managed and operated appropriately.

4.3. UPDATED ACCESSIBILITY COMPLIANCE

As detailed in **Section 3.2** of this RtS Report, the Updated Architectural Drawings at **Appendix A** have been prepared to respond to the accessibility requirements as detailed in the exhibited Accessibility Assessment Report. Subsequently, an updated Accessibility Assessment Report has been prepared by East Coast Accessibility (**Appendix P**) which demonstrates that the Updated Architectural Drawings is able to respond to the accessibility requirements at the detailed phase. The table below summarizes the exhibited access report comments, the changes made as part of the Updated Architectural Drawings in response, and the updated access assessment following.

Table 2 Updates to Accessibility Assessment

Exhibited Access Report Comment	Updated Architectural Design Response	Updated Access Report Comment
D4D2 Level 1 As lap pool in gym area is more than 40m in perimeter an accessible entry into the pool is required. Communal area is required to be accessible, latch side clearance is required. 	The current L1 pool to be built on site has a perimeter of 38.2m², meaning accessible entry into pool is not required. SJB has updated the Architectural Drawings (Appendix A) to reflect L1 pool perimeter to be under 40m as per site condition. 	Provide details of pool entry prior to CC
Redesign for further assessment.		
D4D2 Ground floor – parcel area B If parcel area is to be accessed by all occupants, latch and hinge side clearance is required internally. If there is to be another parcel area for occupants please advise. 	Adjustments to wall thicknesses made to respond to area compliance. 	Latch and hinge side clearance is still required. If parcel locker area in building A is accessible to all occupants in case an occupant with a mobility impairment cannot access the Building B parcel area, this will suffice.
Redesign.	Otherwise, a performance solution to be prepared for adaptable users to access Building A parcel lockers.	
D4D3 Ensure all doors will have a clear opening of 850mm (920mm doors are recommended to achieve this). The doors also require compliant latch and hinge side clearance with AS 1428.1. Please see D4D2 & D4D3 for specifications. Level 01 Circulation space at the doorway doesn't comply (300mm required between basin and door latch)	SJB has updated the Architectural Drawings (Appendix A) to match current CC documentation under the parent consent, which achieves required clearances and circulation as per Australian Standards.	Complies

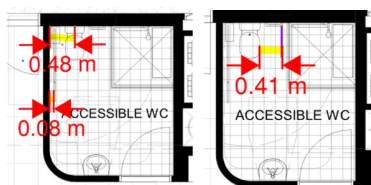


Redesign for further assessment. 'Still required'

F4D5

Level 1 – Accessible WC

Doesn't comply with the requirements of AS1428.1.



Ambulant toilet to comply with Part 16 of the AS1428.1.



Redesign for further assessment. 'Still required'

D4D4

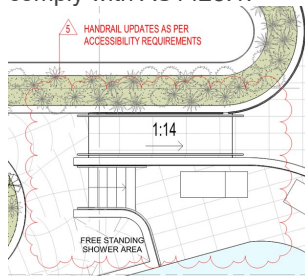
Level 11 – Building A

Ensure stairs comply with AS 1428.1



Redesign for further assessment. 'Still required'

SJB has updated has updated the Architectural Drawings (**Appendix A**) to ensure the stairs comply with AS1428.1.



Stairs and ramp to be in accordance with AS1428.1. Tactiles are still required to stairs and ramp. To be incorporated prior to CC

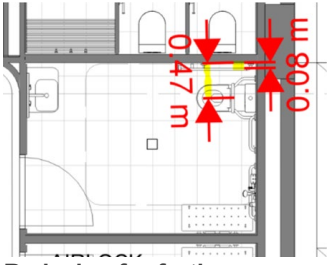
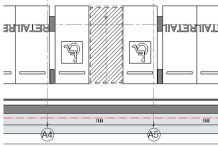
F4D5

Basement 03 – Accessible WC

Doesn't comply with the requirements of AS1428.1.

Upon review B3 Accessible WC documentation does comply with AS1428.1.

Complies

Exhibited Access Report Comment	Updated Architectural Design Response	Updated Access Report Comment
 Redesign for further assessment. 'Still required'	Required for class 6 (retail). 2 accessible carpark spaces provided for retail (located between retail parking spaces). 24 accessible carpark spaces provided for class 2. The size and layout requirements comply. To be in accordance with AS2890.6. 	Already providing 2 x accessible parking spaces for retail in between retail parking bays. Refer to DA-1003 – GA_BASEMENT 01. Complies

4.4. CONSISTENCY & OTHER ASSESSMENT UPDATES

- **Arboricultural:** As detailed in **Section 4.2** of this RtS report, the existing Norfolk Pine Tree was found to be dead and decaying after it was struck by lightning and was approved to be removed and replaced with an 800L Norfolk Island Pine under a separate modification application, DA-400/2021/E. An Arboricultural Addendum letter has been prepared by EziGrow (**Appendix I**).
- **ESD:** An updated ESD report has been prepared by Vipac (**Appendix C**) to update the description of the proposed hot water systems, clarifying that they will consist of high efficiency gas hot water systems (as opposed to high efficiency heat pump hot water systems), consistent with the BASIX.
- **Wind Impact Assessment:** An updated Pedestrian Wind Impact Assessment (**Appendix J**) has been prepared by Vipac. As part of the updated assessment report, Vipac conclude that the proposal is expected to fulfil the recommended criteria for walking at all private balconies, including the amenity of the balconies on Levels 12 and 13 of Building A and Levels 12 to 16 of Building B.
- **Architectural Drawings Assessments:** as part of the updated Architectural Drawings (**Appendix A**), updated drawings and schedules were provided to assist with the assessment of the proposed floor plans:
 - Storage Plan (DA-1810 & DA-1811): updated drawings and table detailing the storage areas and the compliance with the ADG storage volume requirements.
 - Apartment Type Dimensions (DA-4420, DA-4421, DA-4422, DA-4423, DA-4424, DA-4425, DA-4426 & DA-4427): additional apartment type drawings have been prepared which demonstrate the dimensions of the different elements and rooms proposed and their compliance with the ADG.

5. UPDATED PROJECT JUSTIFICATION

This section provides an update project justification and evaluation of the project as a whole.

5.1. PROJECT DESIGN

The design of the proposed development has been meticulously planned to ensure that any potential impacts are effectively mitigated or minimised. The development capitalises on the site's strategic location near Bondi Junction Train Station, leveraging its capacity for additional height and density. This approach aligns with broader objectives to address the critical demand for new housing, including affordable housing, in Sydney.

The proposed built form is largely consistent with the previously approved schemes under the parent consent and has been prepared to maintain its key design principles and continue to demonstrate design excellence. The additional 30% building height and density permitted under the Housing SEPP has been thoughtfully integrated into the proposal. This integration has been achieved without causing unreasonable external impacts related to overshadowing, visual impact, view loss, privacy, and wind effects.

The increased density facilitated by the proposed design supports the delivery of additional affordable rental housing. This enhancement results in significant public benefits by providing new housing opportunities in a well-located centre, close to transport and existing employment hubs in health and education sectors. The design ensures that the development not only meets the immediate housing needs but also contributes positively to the community by enhancing accessibility and connectivity through publicly accessible pedestrian connections across an attractive, activated ground level.

5.2. STRATEGIC CONTEXT

The proposal continues to be consistent with the strategic framework and has been considered against key Government and Council documents including the following:

- National Housing Accord
- NSW Housing Strategy
- Greater Sydney Region Plan – A Metropolis of Three Cities.
- Our Greater Sydney 2056: Eastern City District Plan
- Waverley Local Strategic Planning Statement
- Waverley Local Housing Strategy
- NSW Better Placed

All levels of strategic planning seek to facilitate additional housing (including affordable housing) and 'transit-oriented development' through the '30 minute city' concept. The proposal meets these objectives, given it:

- Proposes residential accommodation with high amenity in an accessible area. The site is proximate to Bondi Junction Train Station and several bus stops. These transport services provide access to Greater Sydney, including key employment centres.
- Will help bolster housing in the Bondi Junction area while providing a significant number of affordable housing dwellings, equating to 15% of the overall development yield. This directly addresses the NSW Government mandate to boost housing supply and tackle housing affordability.
- Incorporates affordable rental housing which creates opportunities for more people to live closer to where they work which is relevant for this site given its location in the Bondi Junction strategic centre as well as the presence of a major hospital and related health facilities in Randwick as well as educational facilities all in close proximity.
- Provides employment generating, non-residential floor space within the podium levels to activate the ground plane and provide a balanced mix of land uses, as envisaged by the WLSPS.

5.3. STATUTORY CONTEXT

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR Waiver accordingly.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the proposed development is classified as SSD.
- The proposal generally complies with the relevant provisions under the Waverley LEP 2012 as detailed in **Appendix C**. Where a variation is proposed to the height control, a clause 4.6 variation request has been prepared to demonstrate that the non-compliance can be supported on a 'merit' basis, with the proposal remaining consistent with the objectives of clause 4.3 despite the variation.
- The proposed development has been assessed in accordance with the Resilience & Hazards SEPP and complies with the relevant clauses.
- The proposal generally accords with the relevant provisions of the Waverley DCP 2022 as outlined in **Appendix C**.

5.4. COMMUNITY VIEWS

Community and stakeholder engagement has been undertaken by the Applicant and Urbis in preparation of the SSDA. This included direct engagement and consultation with:

- Surrounding landowners, residents and businesses.
- Government, agency, utility services and other key stakeholders.

In accordance with the EPA Regulation, the EIS will be placed on formal public exhibition once DPHI has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the Applicant will respond to any matters raised by notified parties.

In accordance with the EPA Regulation, the EIS was placed on formal public exhibition for 28 days between Wednesday 30 April 2025 and Tuesday 27 May 2025. This Submissions Report provides responses to each issue raised in the submissions and sets out the updates made to the proposal in response to the submissions received, along with the supporting technical information.

5.5. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below. For clarity, the additional assessment that was conducted as part of this RtS package are underlined:

Table 3 Environmental Impact Summary

Matter	Summary
Impacts on the natural environment	The proposal is situated across a significantly modified site as site clearing and excavation works have taken place in accordance with the parent development consent. An arboricultural assessment is prepared as part of this proposal to demonstrate that the trees approved to be retained under the parent development consent, will be appropriately protected as part of this SSDA. <u>Notably, during the assessment period for this SSDA, the existing Norfolk Pine Tree was found to be dead and decaying after it was struck by lightning and subsequently, was found to be a safety hazard. As such, a separate development consent, DA-400/2021/E (approved 29 May 2025) approved the removal and replacement mature 800L Norfolk Island Pine at a similar location. This</u>

Matter	Summary
	<u>SSDA will maintain consistency with this previous approval and has been designed to facilitate the replacement Norfolk Pine at the similar location on the site.</u> Additionally, new, high-quality landscaping will be provided across the site. With regard to stormwater management, pedestrian wind conditions and reflectivity, the proposal has been prepared and designed subject to detailed environmental assessments so that subject to the relevant mitigation measures, will thoroughly minimise any impacts to the natural environment. A comprehensive Ecologically Sustainable Development (ESD) strategy has been developed by Vipac in addition to acquiring a BASIX Certificate, demonstrating how the development minimises greenhouse gas emissions and minimises consumption of energy, and material resources, thus delivering a positive ESD outcome. Also, the building complies with key NSW Apartment Design Guide (ADG) design criteria, which will ensure a high standard of internal environmental amenity for occupants. A BDAR Waiver has been issued for the proposal, confirming that the development is unlikely to have any significant impact on biodiversity values on or off the site. The proposal will continue to protect the existing trees, including the Norfolk Pine tree, consistent with the parent consent.
Impacts on the built environment	Built Form and Urban Design: An Architectural Design Report has been prepared to describe the design rationale and process adopted for the proposed development. The proposal is largely consistent with the design approved under the parent consent. Site context and neighbourhood character were carefully considered in the built form and urban design response. The proposed development features a stepped tower design to protect solar access to Centennial Park while delivering an improved visual outcome and much-needed affordable housing. The overshadowing impacts have been meticulously analysed, with the proposal ensuring no additional overshadowing within the designated "no additional impact" areas as prescribed under the Greater Sydney Parklands Shadow Modelling Study 2022. <u>This has been further ratified by the submission made by Greater Sydney Parklands (dated 25 May 2025) which "confirm that the approach to overshadowing in the application is considered reasonable as it results in a minor variation to the current approval and is consistent with the Study".</u> The design predominantly results in additional overshadowing over the bus depot to the south side of Oxford Street, with minimal increases to overshadowing across public roads and streets, ensuring continued provision of adequate solar access to neighbouring properties. The design principles include connections and articulation, public spaces, materiality, communal spaces, and optimised solar and view opportunities. The aesthetic presentation of the proposal has been carefully designed with specific material choices to achieve a high-quality design outcome. Environmental Amenity: The proposal achieves a high level of internal and external amenity in terms of solar access, cross ventilation, overshadowing, communal open space, wind impacts, and visual privacy. The Architectural Design Report indicates that 85% of the apartments will receive at least 2 hours of solar access, exceeding the 70% requirement set by the Apartment Design Guide (ADG). The design incorporates several measures to maximise solar access and improve the amenity of apartments, including avoiding south-facing single-aspect apartments, including dual-aspect apartments, and ensuring optimised apartment depths. Additionally, 65.5% of the apartments will benefit from natural cross ventilation, meeting the ADG's 60% requirement. <u>Typical apartment drawings and area schedules have been prepared to clearly demonstrate the compliance with the ADG.</u> Visual Impact: A comparative view impact assessment has been prepared, comparing the views of the parent consent and the proposed SSDA. The assessment includes views from Centennial Park, Ocean Street/Syd Einfeld Drive, the shopping precinct, Nelson Street/Osmund Lane, and Oxford Street frontage. The proposed design aims to integrate into the streetscape by using sympathetic materials, providing a two-storey podium, and ensuring the façade is broken up to reduce the visual bulk of the residential towers. <u>The Visual Impact Assessment clearly demonstrates the resultant impacts of the proposal in comparison to the approved parent consent and includes extensive views of the surrounding heritage items. This includes numerous assessed viewpoints that reflect the significant views and vistas from the neighbouring Centennial Parkland. Overall, the</u>

Matter	Summary
	<u>VIA confirms that the proposal will result in negligible to moderate overall visual impact on the locality.</u> Access, Traffic, and Parking: Vehicular access to the development is provided via Osmund Lane, consistent with the general access arrangements approved under the parent consent. The proposed amendments to the fitout of four levels of basement parking accommodate servicing and parking demand within the approved basement footprint. <u>25 Accessible parking spaces in accordance with the NCC 2022 requirements, and 98 bicycle parking spaces are proposed across the basement and ground level, meeting with WDCP 2022 requirements and aligning with the GTMP. With regard to residential parking, the non-discretionary car parking rate in the housing SEPP is a minimum parking rate. The proposed 129 residential car spaces is compliant with Section 19 of the Housing SEPP.</u> The accompanying Transport Impact Assessment (TIA) includes a swept path analysis demonstrating compliance with relevant Australian Standards. The proposed development is estimated to generate between 25 and 22 vehicle trips per hour during peak hours, with SIDRA modelling confirming that the additional traffic will not compromise the safety and function of the surrounding road network. <u>The intersection performances remain mostly unchanged when comparing with and without development scenario. With regard to the traffic study and model, the traffic model applies an annual growth rate that is understood to be an acceptable estimate for NSW to predict future traffic and applies a conservative growth rate of 1.5% which is more conservative than the reduced growth rate between 2022 to 2025 due to changes in remote work arrangements.</u> Heritage Impacts: A Heritage Impact Statement (HIS) has been prepared, concluding that the proposed development will have an acceptable impact on the heritage items in the vicinity. <u>The Norfolk Island Pine tree, listed as a local heritage item, was approved to be removed as part of a separate approval, DA-400/2021/E (approved 29 May 2025), due to being considered dead, decaying and dangerous. This SSDA has been updated to be consistent with the approval for the planting of a mature 800L Norfolk Island Pine.</u> The design of the residential towers mitigates the reduction of views towards the Norfolk Island Pine tree by partially reducing the height of the tower in front of where the tree is located. The proposed scheme aims to integrate into the streetscape by using sympathetic materials and providing a two-storey podium that suits the scale of the surrounding heritage items. <u>With regard to the surrounding state and national heritage items, the proposal will generally have a neutral to minor visual impact on most key views from surrounding State Heritage Register (SHR) items such as Centennial Park, Moore Park, Queens Park, Centennial Park Reservoir, and Waimea House. The main visual impact will be moderate and limited to a specific view from Grand Drive in Centennial Park, where additional storeys will be visible above the tree line. The proposal will not physically impact the nationally significant Centennial Park, as it is outside the heritage item's curtilage. The moderate visual impact from the north-eastern section of Centennial Park will not obscure any heritage elements, and overshadowing will be minimal and acceptable. Overall, the proposal is consistent with the historic cultural heritage values of Centennial Park and is unlikely to significantly impact its National Heritage values.</u> Other Impacts: As excavation and construction on the basement structure have already commenced, impacts related to geotechnical matters, groundwater, and contamination have already been satisfactorily addressed at the previous DA stage. The proposed works will have no additional impacts considering the site's geotechnical conditions, contamination status, or require further remediation for the site or surrounding area.
Social impacts	The proposal has been assessed to have an overall positive social impact in relation to changes to the local population associated with new housing development, delivery of affordable housing and housing in an accessible location, and additional employment opportunities. Any negative impacts primarily relate to the temporary impacts of construction which can be suitably mitigated.
Economic impacts	The proposal will have a positive economic impact through the delivery of employment generating floor space for 350 FTE jobs during the construction phase and 25 ongoing jobs during the operational phase of the development.

5.6. SUITABILITY OF THE SITE

The site is considered highly suitable for the proposed development for the following reasons:

- The Proposal is consistent with the MU1 (Mixed Use) zone objectives, is permitted with consent and satisfactorily addresses the relevant provisions in the Waverley LEP and DCP.
- The site is currently underutilised and presents a significant opportunity to provide a high-density mixed-use building in Bondi Junction.
- The site is not affected by critical constraints which cannot be successfully abated through skilful design or the implementation of mitigation measures. The proposed development design and height has been prepared with a variation to the height control (supported by a clause 4.6 variation request) and demonstrates an improved urban design outcome and appropriate response to the neighbouring Centennial Parkland.
- The character and scale of the development has been prepared to appropriately respond to the gateway, corner site context as well as the scale and character of the neighbouring commercial terraces along Oxford Street.
- The proposal will co-locate housing and employment generating floorspace in an accessible area, contributing to the role of Bondi Junction in supporting the '30-minute city' vision.

5.7. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposal delivers affordable housing in an accessible location, directly responding to the NSW Government's policy mandate to improve housing choice and affordability. The site's location allows easy access to employment centres, retail, open space, and social infrastructure (schools, hospitals etc). No unreasonable environmental, social or economic impacts will result from the proposal.
- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant planning controls. Accordingly, it delivers a development outcome consistent with the vision established by the National Housing Accord, NSW Government's Housing Strategy and the in-fill affordable housing provisions of the Housing SEPP.
- The EIS and accompanying Design Report demonstrates that the proposed Housing SEPP scheme is not responsible for any unreasonable external impacts in regard to overshadowing, visual impact, view loss, privacy and wind impacts.
- The proposal will have a positive economic impact through the delivery of employment generating floor space for 350 FTE jobs during the construction phase and 25 ongoing jobs during the operational phase of the development.
- The site will facilitate the orderly and economic use and development of the land.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

DISCLAIMER

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

UPDATED ARCHITECTURAL DRAWINGS

APPENDIX B

UPDATED BASIX CERTIFICATE

APPENDIX C

UPDATED ESD REPORT

APPENDIX D

UPDATED VISUAL IMPACT ASSESSMENT

APPENDIX E

EDC REPORT

APPENDIX F

UPDATED TRANSPORT IMPACT ASSESSMENT

APPENDIX G

ADDITIONAL SWEPT PATH ANALYSIS

APPENDIX H

STANTEC RESPONSE TO PUBLIC SUBMISSIONS

APPENDIX I

ARBORICULTURAL ADDENDUM LETTER

APPENDIX J

UPDATED PEDESTRIAN WIND ASSESSMENT

APPENDIX K

MODIFICATION TO EXISTING DEVELOPMENT CONSENTS

APPENDIX L

RESPONSE TO HNSW COMMENTS

APPENDIX M

EPBC ACT SELF-ASSESSMENT

APPENDIX N

UPDATED CLAUSE 4.6

APPENDIX O

LOADING DOCK MANAGEMENT PLAN

APPENDIX P

UPDATED ACCESSIBILITY ASSESSMENT

APPENDIX Q

DCCEEW DECISION

APPENDIX R

HERIATAGE PEER REVIEW

