



5 November 2025

REF: SSD-78156462

Aditi Coomar  
DPHI  
Via email

**Attention: Aditi Coomar**

**RE: REQUEST FOR ADDITIONAL INFORMATION – SSD-78156462  
PROPERTY AT: 12-16 Bent Street LINDFIELD**

Dear Aditi,

I refer to the Request for Further Information (RFI) provided by DPHI via Major Projects dated 21<sup>st</sup> October 2025 and recent email correspondence dated 4<sup>th</sup> November 2025 in relation to SSD-78156462 for a Residential Flat Building with infill affordable housing at 12-16 Bent Street, Lindfield (the Site).

Please refer to the appendices below which provide the applicant's response/clarifications to each matter raised in the RFI.

<b>Appendix 1</b>	ADG Compliance Table
<b>Appendix 2</b>	Updated List of Amendments
<b>Appendix 3</b>	GFA Plans
<b>Appendix 4</b>	Updated Statutory Compliance Table (Housing SEPP)
<b>Appendix 5</b>	Redacted ACHAR Report

The following additional information has been requested in DPHI's RFI and has been summarised with the applicant's response:

[DPHI Comment dated 21<sup>st</sup> October 2025](#)

**List of amendments and compliance table**

- *An addendum document itemising all changes that have been proposed needs to be submitted to clearly identify the amendments to the proposal.*
- *A comparison table with approved vs proposed as an RTS is required to be added to the itemised list including references to drawings and Appendices as needed.*
- *An amended statutory compliance table with revised calculations addressing State Environmental Planning Policy (Housing)2021 (Housing SEPP), Gross floor area (GFA) calculations, bonuses (including the proposed Floor Space Ratio (FSR) bonus vs the height bonus and how this has been addressed by proposing additional affordable housing) and Apartment Design Guide (ADG) compliance.*

**Affordable housing GFA and bonus**

ACN: 146 035 707 ABN: 54 146 035 707  
165 Walker Street  
North Sydney, NSW 2060

enquiries@willowtp.com.au  
willowtreeplanning.com.au  
02 9929 6974



SYDNEY | BRISBANE

The Department notes that the overall GFA and, in particular, the affordable housing GFA has been incorrectly calculated.

*We note that the proposed FSR is now 3.19:1 which is below the 30% bonus (27.9%). The proposal still seeks for a 30% height bonus under clause 16(3) of the Housing SEPP. To address this discrepancy, you propose to increase the affordable housing provisions to be 17% of the maximum allowable GFA on the site, being 14,053m<sup>2</sup>. The Department agrees to this approach.*

*However, the amended architectural plans identify that 17% of 14053 m<sup>2</sup> (2389 m<sup>2</sup>) has not been allocated as affordable housing. The circulation areas have been deleted from the allowable GFA and then 17% of the residual GFA (total – circulation) has been allocated to affordable housing. This means that the circulation area has been entirely deleted from the GFA calculations.*

*The definition of GFA or provision of bonuses do not specify deletion of circulation areas.*

*Consequently, 2389 m<sup>2</sup> is required to be dedicated as affordable housing and then divided as 15% infill and 2% in perpetuity. You are allowed to include circulation areas in the 17% affordable GFA. The circulation areas can be apportioned between market and affordable GFA, in case the two types are proposed on a single floor. If an entire floor is dedicated to affordable housing, then it can include all the circulation areas in the GFA.*

*Please submit revised calculations and amend the calculations in the Architectural plans to address this GFA inconsistency.*

Applicant comment:

The applicant acknowledges DPHI's identification of the GFA calculation inconsistency and confirms that the revised submission comprehensively addresses all matters raised in the RFI.

In response to the specific GFA concerns:

- The revised architectural plans (**Appendix 3**) reintegrate circulation areas into the GFA calculations as directed, with the 2,389 m<sup>2</sup> affordable housing allocation (17% of the maximum allowable GFA of 14,053 m<sup>2</sup>) apportioned as 15% infill and 2% in perpetuity in accordance with clause 16(4) of the Housing SEPP.
- Circulation areas are now appropriately attributed to the relevant GFA categories on a floor-by-floor basis, with apportionment between market and affordable housing reflected where floors are mixed-use, and entire floors dedicated to affordable housing including all associated circulation areas.
- The amended statutory compliance table (**Appendix 4**) provides detailed GFA calculations with cross-references to the revised architectural plans, demonstrating compliance with the Housing SEPP bonus framework and FSR/height provisions.

Regarding design and compliance matters:

- The list of amendments (**Appendix 2**) itemises all proposed changes with references to relevant drawings and appendices, providing clear identification of variations from the original submission.
- The ADG compliance table (**Appendix 1**) confirms alignment with the Apartment Design Guide across all residential units.
- The redacted ACHAR report (**Appendix 5**) addresses Aboriginal cultural heritage considerations in accordance with relevant assessment requirements.



## Overall changes:

- The proposed development comprises of 111 units (reduced from 115 units from the original proposal) comprising of 1, 2, 3 & 4 bedroom units. The development achieves a FSR of 3.19:1 (reduced from 3.25:1), and achieves a GFA of 13,801m<sup>2</sup> (reduced from 14,053m<sup>2</sup>).
- The proposed development comprises 26 affordable housing units (reduced from 28) totalling 2,403.4m<sup>2</sup>, with a mix of one, two and three-bedroom unit types. This represents 17.41% of the achieved GFA of 13,801m<sup>2</sup>. The development achieves an FSR of 3.19:1 (reduced from 3.25:1) and seeks a 30% building height bonus under Clause 16(3) of the Housing SEPP. The Department has confirmed in-principle support for this bonus, conditional on the provision of 2,403.4m<sup>2</sup> of affordable housing, comprising a minimum of 15% infill affordable housing and a minimum of 2% affordable housing in perpetuity.
- The proposed building height of 31.8m represents a variation of 3.2m (11.18%) above the 28.6m maximum permissible height. This is a reduction of 0.25m from the original proposal of 32.05m in the EIS.
- The 145 car parking spaces proposed comply with the non-discretionary standards under Clause 19(e) and (f) of the Housing SEPP based on the unit mix of 26 affordable housing units and 85 market housing units. 164 car parking spaces were originally proposed. The current proposal represents a 19-car parking space reduction.

We trust the above information satisfactorily closes out the matters in DPHI's RFI dated 21<sup>st</sup> October 2025 and recent email correspondence dated 4<sup>th</sup> November 2025.

If you have any queries or concerns in relation to the above and/or attached, or if you require any further clarification, please do not hesitate to contact Marcus Butler by email at [mbutler@willowtp.com.au](mailto:mbutler@willowtp.com.au) or by phone on 0400 878 696.

Kind regards

*Marcus Butler*

Senior Planner  
Willowtree Planning Pty Ltd

