



Environmental Impact Statement

Florida Street, Sylvania, State Significant Development

SSD-83258708

29 Florida Street, Sylvania

Prepared on behalf of Homes NSW

10 December 2025

FPDplanning

Document control

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Project summary

Prepared on behalf of	NSW Land and Housing Corporation operating as Homes NSW
Land to be developed	29 Florida Street, Sylvania
Legal description	X DP411212, Y DP411212, Lots 2-9 & Lots 10-13 DP22661, Lot 104 DP 733063
Project description	Construction of eight residential buildings ranging in height from seven to nine storeys, accommodating 325 market dwellings and 159 social dwellings.

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EIS Declaration

Project details	
Project Name	Florida Street, Sylvania, Affordable Housing
Application number	SSD-83258708
Address of the land in respect of which the development application is made	29 Florida Street, Sylvania
Applicant details	
Applicant name	NSW Land and Housing Corporation operating as Homes NSW
Applicant address	6 Parramatta Square 10 Darcy Street Parramatta NSW 2150
Details of person by whom this EIS was prepared	
Name	Katrina Burley
Address	PO Box H219 Australia Square NSW 1215
Professional qualifications	B. Urban & Regional Planning, University of New England
Declaration by registered environmental assessment practitioner	
Name	Michael File
Registration Number	8596
Organisation Registered With:	Member, Planning Institute of Australia
Declaration	The undersigned declares that this EIS: • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the • development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, • including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;

	- contains a consolidated description of the project in a single chapter of the EIS; - contains an accurate summary of the findings of any community engagement; and - contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	 
Date	10 December 2025

Executive Summary

This Environmental Impact Statement (EIS) has been prepared by FPD Planning on behalf of Homes NSW for a State Significant Development Application (SSD-83258708) for the construction of eight residential buildings with a total of 484 dwellings, including 159 affordable housing dwellings at 29 Florida Street, Sylvania (the Site).

The purpose of this EIS is to address the Secretary's Environmental Assessment Requirements (SEARs) for the project issued by the Department of Planning, Housing and Industry (DPHI) on 2 May 2025. This EIS should be read in conjunction with the SEARs Response Table at Appendix A and the supporting technical documents provided at Appendix B – Z.

The Site

The Site is located at 29 Florida Street, Sylvania in the Sutherland Local Government Area (LGA) and comprises 14 lots with a combined site area of approximately 21,792sqm.

It is currently occupied with two storey terrace buildings and 3-4 storey apartment buildings containing 83 social housing dwellings. It is zoned R4 High Density Residential under the Sutherland Local Environmental Plan (LEP) 2015.

The Site is bound by the Princes Highway to the north, Port Hacking Road to the west, Pembroke Street to the south and Florida Street to the east. The site has access from Florida Street via an internal roadway (Coral Tree Place). Southgate Shopping Centre is located opposite the Site on Port Hacking Road.

Proposed Development

The proposed development includes site preparation works, tree removal and demolition of all structures, and the construction of eight (8) residential buildings up to nine (9) storeys across the site, including basement parking, construction of a new access street, associated landscaping and public domain works, infrastructure servicing, lot consolidation and Torrens subdivision.

Refer to Section 3 for detailed project description.

Strategic Context

The proposal directly responds to the NSW Government's commitment under the National Housing Accord to deliver approximately 377,000 new well-located dwellings by 2029. It will deliver much needed housing, including social housing, in a well-located area serviced by public transport, jobs and services and will support the delivery of the Sutherland Shire Council's Housing Target of 6,000 new homes to be completed by 2029.

It also implements the strategic objectives of the NSW Government's low and mid rise housing reforms introduced in February 2025 which aim to increase housing in supply in walking distance of identified centres and stations.

The development will renew 83 existing social housing dwellings, to deliver increased housing supply, including increased social housing, in well-located and accessible area. The proposal will provide for a total of 484 new homes including 159 new social housing dwellings (providing an additional 76 social housing dwellings on the site) and 325 market dwellings to deliver increased housing supply across the site.

The proposal is also consistent with the priorities and actions in the Sutherland Council's Local Strategic Planning Statement and Local Housing Strategy relating the renewal of social housing

and delivery of affordable housing in a well-serviced location to assist with addressing the increasing need for affordable housing the Sutherland LGA.

Importantly, the proposal will facilitate the delivery of housing diversity and choice to help meet the needs of a wide range of households in Sutherland Shire and respond directly to Council's strategic actions to renew social housing and increase density close to centres.

The proposal directly responds to the NSW Government and Sutherland Shire Council's strategic objectives to increased housing supply in well-located areas close to existing centres and public transport, and to deliver more social housing to meet the urgent need for social housing.

Statutory Context

The proposed development is declared State Significant Development (SSD) in accordance with Schedule 1, Clause 26 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) as the development will be carried out by or on behalf of the Land and Housing Corporation and has an Estimated Development Cost (EDC) of more than \$30 million.

The proposal responds to the SEARs as demonstrated in this EIS and SEARs Response Table at Appendix A.

The site is located within the Sutherland Local Government Area (LGA) and is zoned R4 High Density Residential under *Sutherland Local Environmental Plan 2015* (Sutherland LEP). The proposed development is for the purpose of residential flat buildings which are permissible with consent in the R4 High Density Residential zone in accordance with the Sutherland LEP.

The site is located within the 'inner area' of an identified Town Centre being within 400m of Southgate Shopping Centre Town Centre and accordingly the controls under Chapter 6 – Low and Mid Rise Housing and of the State Environmental Planning Policy (Housing) (Housing SEPP) apply to the site. The site is also within an accessible area and eligible for the additional floor space and building height bonuses under Chapter 2 of the Housing SEPP.

The proposed development has been assessed against the relevant State Environmental Planning Policies (SEPPs) and planning controls in the Housing SEPP and Sutherland LEP 2015 and is generally consistent with the relevant controls as outlined in the Statutory Compliance Table at Appendix C.

This EIS is consistent with the principles of Ecologically Sustainable Development (ESD) in accordance with Clause 192 of the EP&A Regulation and is addressed in the ESD Report at Appendix M.

Engagement

The proposed development has been informed by consultation with relevant local and state agencies including Sutherland Council, DPHI, NSW Government Architect, as well as the local community.

Refer to Section 5 and the Consultation Report prepared by Homes NSW at Appendix Q which provides detail on the consultation undertaken to inform the proposed development.

Assessment

This EIS and supporting appendices demonstrate the suitability of the site for the proposed development and provide an assessment of the potential impacts of the proposal and proposed measures to ensure all potential impacts can be mitigated.

Environmental Impacts

- The proposal aligns with the strategic objectives of the NSW Government's low and mid rise housing reforms to increase housing within walking distance to identified centres – which includes Southgate Shopping Centre.
- The proposal achieves a quality design outcome that will deliver a high level of internal amenity for future residents by optimising solar access, cross ventilation and privacy for residents.
- The proposal minimises overshadowing and amenity impacts within the site, and will not result in any unacceptable overshadowing, privacy or amenity impacts to neighbouring properties.
- The proposal will not result in any unacceptable traffic or transport impacts and provides on-site parking in accordance with requirements in the Housing SEPP and Sutherland Shire DCP.
- The proposal will not result in any heritage or archaeological impacts.
- The proposal is designed safely above the relevant flood levels to mitigate flood risk on site and will not result in any significant impacts to flood behaviour on the site or surrounding properties.
- The proposed development will deliver ecologically sustainable development in accordance with NSW Government sustainability targets.
- The proposed development will deliver landscaping, communal open space, deep soil and tree canopy outcomes that exceed relevant targets.

The EIS and supporting appendices also demonstrate that the proposal can adequately manage all on-site and off-site impacts such as noise, stormwater, construction, waste and contamination with appropriate measures to be implemented for the site.

The EIS demonstrates that the proposal will not result in any unacceptable environmental impacts and that all potential impacts can be mitigated.

Social and Economic Impacts

The proposal will result in positive social and economic benefits through the provision of new housing, including 159 social dwellings, which will increase housing diversity in a well-located area and stimulate the local economy by providing more local construction jobs.

Justification and Conclusion

This EIS demonstrates that proposal is consistent with the strategic planning framework, will not result in any unacceptable environmental, social, or economic impacts, and is in the public interest.

There are no known site conditions that would prevent the proposed development from proceeding, and all likely impacts can be appropriately mitigated. It is therefore recommended that the application is approved.

1 Introduction

This Environmental Impact Statement (EIS) is submitted to the Department of Planning, Housing and Infrastructure (DPHI) in support of a State Significant Development Application (SSDA) for the construction of eight residential buildings up to nine storeys, accommodating 484 dwellings including 159 social housing dwellings at 29 Florida Street, Sylvania (the site).

The site is located within Sutherland Local Government Area (LGA) and is zoned R4 High Density Residential under the *Sutherland Local Environmental Plan 2015* (Sutherland LEP). Residential flat buildings are permitted with consent in the R4 High Density Residential zone under Sutherland LEP.

The site is located within the 'inner area' of an identified Town Centre being within 400m of Southgate Shopping Centre Town Centre and accordingly the controls under Chapter 6 – Low and Mid Rise Housing and of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) apply to the site. The site is also within an accessible area and eligible for the additional floor space and building height bonuses under Chapter 2 of the Housing SEPP.

The EIS has been prepared by FPD Planning on behalf of NSW Land and Housing Corporation operating as Homes NSW as the applicant. The EIS is based on the proposed Architectural Plans prepared by BVN Architects at Appendix F and supporting technical reports appended to this EIS.

The proposed development is declared State Significant Development (SSD) in accordance with Schedule 1, Clause 26 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), as the development will be carried out by Land and Housing Corporation with an Estimated Development Cost (EDC) of more than \$30 million and will also result in more than 75 dwellings.

This EIS has been prepared in accordance with the requirements of:

- Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act)
- Division 5 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation),
- DPHI's '*State Significant Development Guidelines – Preparing an Environmental Impact Statement*'
- The Secretary's Environmental Assessment Requirements (SEARs) issued 2 May 2025 at (Appendix A).

1.1 The Applicant

NSW Land and Housing Corporation (operating as Homes NSW) is the applicant for this SSD. The applicant's details are provided in Table 1 below.

Table 1 Applicant details

Applicant details	
Applicant name	NSW Land and Housing Corporation (operating as Homes NSW)
Applicant address	4 Parramatta Square 12 Darcy Street Parramatta NSW 2150
ABN	24 960 729 253
Land owner	NSW Land and Housing Corporation

1.2 Site Description

The Site is located at 29 Florida Street, Sylvania. The site comprises 14 lots and has a total combined site area of 21,792sqm and is legally described as Lot X DP411212, Y DP411212, Lots 2-9 & Lots 10-13 DP22661, Lot 104 DP 733063.

The Site falls within the block bounded by the Princes Highway to the north, Port Hacking Road to the west, Pembroke Street to the south and Florida Street to the east. The Site has access from Florida Street via an internal roadway (Coral Tree Place).

The Site is currently occupied with ten buildings ranging from two-four storeys, containing 83 social housing dwellings.

To the west of the Site is Southgate Shopping Centre providing access to a wide range of retail and services. To the south and east the Site is surrounded by low density residential areas within the wider suburb of Sylvania. To the north across Princes Highway are commercial uses including retail shops, childcare and a car dealer.

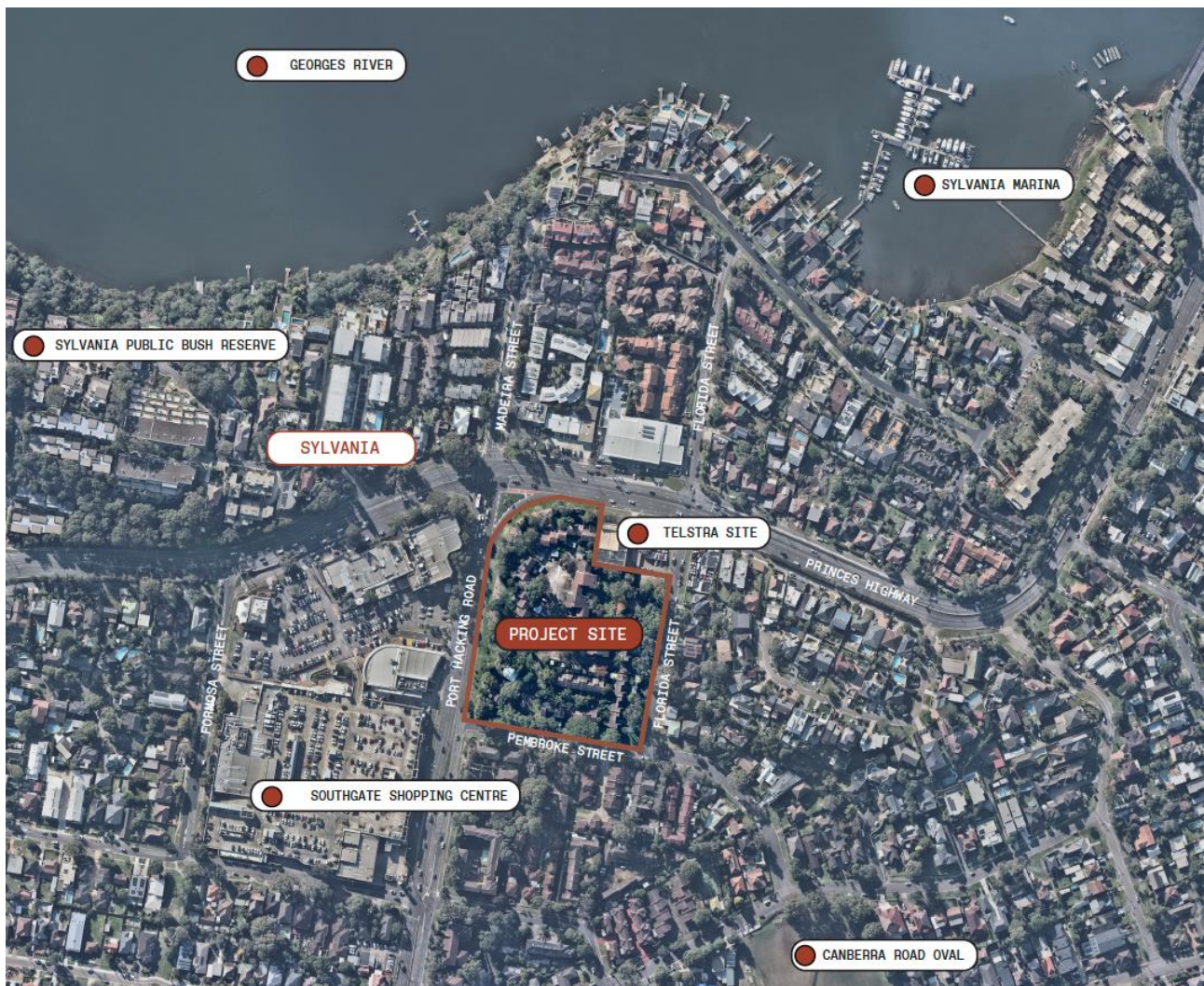


Figure 1: Subject site (Source: BVN Architects)

1.3 Overview of the Proposed Development

The application seeks approval for construction of eight residential buildings up to nine storeys across the Site, containing a total of 484 dwellings including 159 social dwellings.

The proposed development will be staged development over two stages to enable the early delivery of social housing dwellings in the first stage of development.

Specifically, approval is being sought for the following:

Development of Stage 1/ Social Housing Lot

- Demolition, remediation, tree removal, excavation and site preparation works.
- Construction of two residential buildings comprising:
 - An eight storey and nine storey building with 159 social housing apartments, constructed over two levels of shared basement / ground level parking accessed from Pembroke Street.
- Associated landscaping and communal open space.
- Infrastructure servicing.

Development of Stage 2/ Market Housing Lot

- Demolition, remediation, tree removal, excavation and site preparation works.
- Construction of six residential buildings comprising:
 - Three nine storey buildings with 168 dwellings, constructed over four levels of shared basement parking (Market Building 1 – North).
 - A seven storey building with 52 apartments, constructed over three levels of basement level parking (Market Building 2 – South).
 - A seven storey and eight-storey building with 105 apartments, constructed over four levels of shared basement parking (Market Building 3 – West).
- Construction of new one-way access street from Florida Street.
- Associated landscaping and public domain works.
- Infrastructure servicing.
- Lot consolidation.
- Torrens subdivision to create two lots.

The proposed development is generally consistent with development as described in the Request for SEARs.

1.4 Summary of Planning Controls

The Site is zoned R4 High Density Residential under the Sutherland LEP and the proposed development for residential flat buildings is permitted with consent in the R4 High Density Residential zone.

The Site is subject to the low and mid rise housing provisions within Chapter 6 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP). Chapter 6 of the Housing SEPP sets out non-discretionary development standards which apply to land within walking distance of identified Town Centres.

The site is located within the 'inner area' of an identified Town Centre being within 400m of Southgate Shopping Centre Town Centre and the following controls apply to the site:

- Maximum Building Height: 22m

- Maximum FSR: 2.2:1.

The proposal is being undertaken in accordance with the provisions in Chapter 6 of the Housing SEPP, and the in-fill affordable housing provisions in Chapter 2, Part 2, Division 1 of the Housing SEPP which allows for an additional 30% height and floor space ratio (FSR) where development provides at least 15% affordable housing.

The proposed development is residential development being undertaken by Homes NSW (NSW Land and Housing Corporation), and therefore, in accordance with Section 15B (2) of the Housing SEPP, the proposed development is taken to be for the purposes of affordable housing.

The maximum permissible height and FSR under Housing SEPP provisions is detailed in Table 1.

Table 2 Summary of the height and FSR controls

	Sutherland LEP	Low and mid-rise provisions	30% bonus Housing SEPP	Maximum height under Housing SEPP	Proposed
Building height	16m	22m	+6.6m	28.6m	33.05m
Floor space ratio	1.6:1	2.2:1	+0.66:1	2.86:1	2.05:1

For further information refer to assessment of all relevant controls in the Sutherland LEP and Housing SEPP in the Statutory Compliance Table at Appendix B.

1.5 Project objectives

The objectives of the proposal are to:

- Facilitate increased housing supply in a well-located area, including social housing, to help address the housing crisis in NSW.
- Contribute to NSW's affordable housing targets under the National Housing Accord 2022.
- Contribute to Sutherland Council's local housing targets including targets for affordable housing.
- Provide a high-quality residential development with a high level of residential amenity.
- Facilitate the delivery of housing diversity and choice to help meet the needs of a wide range of households in Sutherland.

2 Strategic Context

2.1 Site Context

The site is located at 29 Florida Street, Sylvania in the Sutherland Local Government Area (LGA) and comprises 14 lots with a combined site area of approximately 21,792sqm.

It is currently occupied with two storey terrace buildings and 3-4 storey apartment buildings containing 83 social housing dwellings. It is zoned R4 High Density Residential under the Sutherland Local Environmental Plan (LEP) 2015.

The Site is bound by the Princes Highway to the north, Port Hacking Road to the west, Pembroke Street to the south and Florida Street to the east. The site has access from Florida Street via an internal roadway (Coral Tree Place).

The site comprises the majority of the street block, with the exception of industrial and infrastructure uses which are located directly to the north and west at the corner of Florida Street and Princes Highway. This land comprises a car dealer and adjacent vacant land zoned R4 and a telecommunications facility zoned SP2 Infrastructure.

To the west is Southgate Shopping Centre providing access to retail and services. To the south and east are low density residential areas within the wider suburb of Sylvania. To the north across Princes Highway are commercial uses including retail, childcare and a car dealer.

A number of bus routes service the area stopping at Southgate Shopping Centre near the site including route 7 from Cronulla to Sydney Olympic Park, 970 Miranda to Hurstville Station, 971 Cronulla to Hurstville, and 972 Sylvania to Miranda.

2.1.1 Key features of the site and context

Table 3: Key features of the site and context

Relevant provisions	Consideration
Existing development	There are currently 10 existing buildings on site, containing 83 dwellings.
Access and transport	Public transport The Site is well serviced by buses with a number of bus routes servicing the area stopping at Southgate Shopping Centre near the site including route 7 from Cronulla to Sydney Olympic Park, 970 Miranda to Hurstville Station, 971 Cronulla to Hurstville, and 972 Sylvania to Miranda. Miranda Train Station is the closest train station, approximately 3.4km from the Site. Vehicular access The Site is accessed from Florida Street. Coral Tree Place provides access within the Site.
Topography	There is a significant fall of approximately 8.5m across the site from highest corner in the northeast fronting Princes Highway to the lowest point in the southwest at the corner of Port Hacking Road and Pembroke Street. The site has a high point of approximately RL 21.6m at the northeast corner and slopes down to RL13m in the at southwestern boundary on Pembroke Street.

Relevant provisions	Consideration
Existing vegetation	The site contains a number of mature high value trees, primarily the western, southern and eastern boundaries. There are a total of 24 high retention value trees (11% of assessed trees) located on, or adjacent to the site. For further information refer to the Arboricultural Impact Assessment at Appendix I.
Flooding	The site is affected by overland flooding in the 1% Annual Exceedance Period (AEP) and Probable Maximum Flood (PMF) events. For further information refer to Section 6.15 and the Flood Impact and Risk Assessment at Appendix K.
Heritage	The site is not listed as a heritage item or within a heritage conservation area, nor is the site located within the immediate vicinity of any heritage items or heritage conservation areas.
Geotechnical conditions	The site is mapped as containing Class 5 acid sulfate soils under Sutherland LEP. For further information refer to Geotechnical Report at Appendix U.
Bush fire	The site is not mapped as bush fire prone land.
Services and easements	An existing stormwater easement and stormwater drainage infrastructure runs along the western portion of the site.
Surrounding land uses	The uses surrounding the site comprise: • North: To the north of the Princes Highway are commercial uses including retail uses, a childcare centre and a car dealership. • East: To the east of Florida Street is low density residential housing containing mostly single and two storey dwelling houses and dual occupancies. • South: To the south of Pembroke Street is low and medium density residential housing containing a range of single and two storey dwellings, villas, townhouses and walk-up flat buildings • West: To the immediate west is Southgate Shopping Centre providing access to a wide range of retail and services including Coles and Woolworths, Kmart, pharmacies, Australia Post, banking services and other speciality stores.

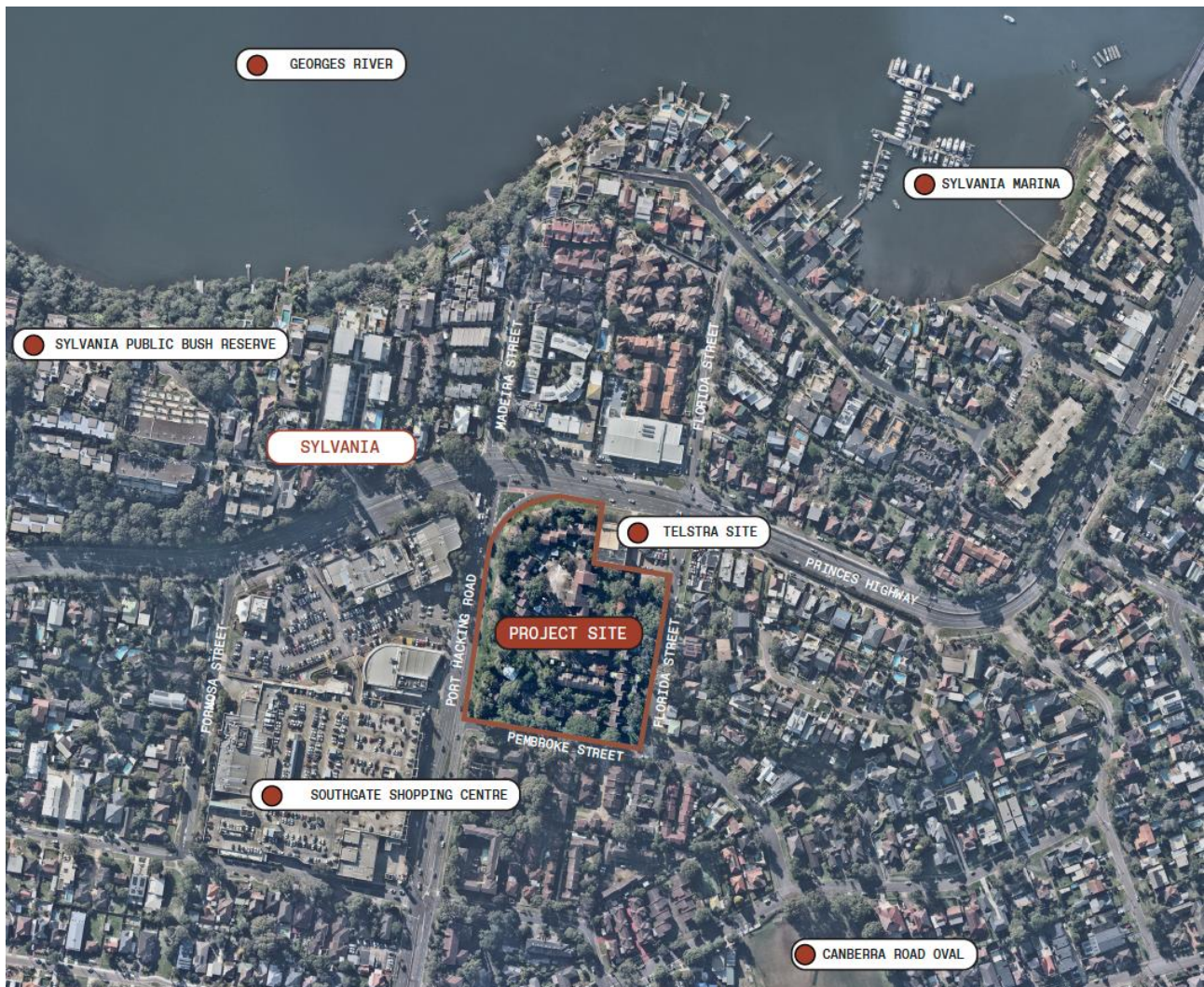


Figure 2 Site context (Source: BVN)

2.2 Strategic Planning Context

The NSW Government has identified that there is a critical need for affordable housing. The proposal directly responds to the NSW Government's commitment under the National Housing Accord to deliver approximately 377,000 new well-located dwellings by 2029.

The development will deliver much needed housing, including affordable housing in a highly accessible and well serviced area, with 484 dwellings, including 159 social housing dwellings, proposed on the Site. Consistent with priorities and actions as set out in the Greater Sydney Regional Plan 2036, South District Plan, Sutherland's Local Strategic Planning Statement (LSPS) and the Sutherland Local Housing Strategy (LHS), the proposal will provide new social housing in a well-located area assist with addressing the increasing need for housing in the Sutherland Shire.

The proposal seeks to implement the intended outcomes of the low and mid rise housing policy to encourage increased housing within well-located areas, within walking distance to services and transport. The site's identification in an 'inner area' of the Southgate Shopping Centre Town Centre confirms the suitability of the site to accommodate higher density residential development and responds to the strategic objectives and identified need for more affordable housing near centres and transport to allow people to live close to transport, jobs, services and amenities.

The proposed development is consistent with the relevant strategic planning policies and guidelines as outlined in Table 4 below.

Table 4 Consistency with strategic framework

Strategic document	Consistency
National Housing Accord	In October 2022, the Federal Government announced the National Housing Accord, which committed to delivering 1.2 million houses in well-located areas over five years from mid-2024. Under the Accord, NSW has agreed to build 377,000 new homes and 3,100 affordable homes. The NSW Government has allocated a housing target of 6,000 new homes to be completed in the Sutherland Shire by 2029. The proposal will deliver 484 new homes, including 159 social homes and 325 market homes, in a well-located area, serviced by a high level of amenity and well serviced by public transport.
NSW Housing Strategy 2041	Housing 2041 provides a 20-year vision for housing in NSW by setting goals and ambitions to deliver better housing outcomes in the right locations and housing that suits diverse needs and feels like home. The proposed development is consistent with the 20-year vision in the Housing Strategy as it will deliver increased affordable housing, in well-serviced and accessible area with access to public transport, local facilities and services. The proposal aligns with the priorities of Housing 2041, in particularly Priority Area 3 which focuses on maximising the impact of government-owned land and government led development projects. The Strategy highlights the benefit of investment in housing on government-owned land, which can deliver more social housing and improve housing affordability that is safe and secure and will help contribute to positive wellbeing outcomes.
Greater Sydney Region Plan	The Greater Sydney Region Plan, A Metropolis of Three Cities was released by the Greater Sydney Commission in March 2018. The Plan is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities. The Plan also aims to provide ongoing housing supply and a range of housing types in the right places to create more liveable neighbourhoods and support Sydney's growing population. The proposal directly responds to a number of objectives in the Plan including: • Objective 10: Greater housing supply • Objective 11: Housing is more affordable and diverse • Objective 12: Great places that bring people together • Objective 30: Urban tree canopy cover is increased • Objective 31: Public open space is accessible, protected and enhanced • Objective 37: Exposure to natural and urban hazards are reduced • Objective 38: Heatwaves and extreme heat are managed.
South District Plan	The South District Plan was developed to support the Greater Sydney Region Plan. The 20- year District Plan seeks to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. The proposal is consistent with the following planning priorities in the South District Plan: • Planning Priority S1: Planning for a city supported by infrastructure • Planning Priority S4: Fostering healthy, creative, culturally rich and socially connected communities • Planning Priority S5: Providing housing supply, choice and affordability with access to jobs, services and public transport

Strategic document	Consistency
	• Planning Priority S6: Creating and renewing great places and local centres and respecting the District's heritage • Planning Priority S12: Delivering integrated land use and transport planning and a 30-minute city • Planning Priority S15: Increasing urban tree canopy cover and delivering green grid connections • Planning Priority S16: Reducing transport-related greenhouse gas emissions • Planning Priority S17: Reducing carbon emissions and managing energy, water and waste efficiently • Planning Priority S18: Adapting to the impacts of urban and natural hazards and climate change.
Future Transport Strategy	The Future Transport Strategy sets a 40-year vision, directions and outcomes framework for customer mobility in NSW, which will guide transport investment over the longer term. It aims to respond to rapid changes in technology and deliver innovation to create and maintain a world class, safe, efficient, and reliable transport system over the next 40 years. The vision is built on six state-wide outcomes: customer focused, successful places, a strong economy, safety and performance, accessible services, and sustainability. The proposal is consistent with these outcomes as it will deliver new housing in a well located, accessible area which has access to a high frequency of bus services to Miranda, Cronulla, Hurstville and Sydney Olympic Park. The site is also adjacent to the Southgate Shopping Centre which contains a wide range of retail and services which will encourage sustainable modes of transportation including both walking and cycling for future occupants and visitors of the site.
Better Placed	Better Placed was released in May 2017 by the Government Architect NSW (GANSW) to provide guidance on the quality design of urban environments. Better Placed is underpinned by seven objectives for good design including better fit, better performance, better for community, better for people, better working, better look and feel. The proposal responds to the above objectives as detailed in the Design Report at Appendix E.
Sutherland Local Strategic Planning Statement (LSPS)	The Sutherland Shire Local Strategic Planning Statement (LSPS) outlines the vision and planning principles to guide land use decisions over the next 20 years. It identifies priorities for infrastructure, housing, town centres, employment, transport, recreation and the environment. The proposal is consistent with the Sutherland LSPS and aligns with the planning priorities, in particular: • Planning Priority 10: Provide our community with housing choice by making opportunities for a range of housing sizes and types within each community. The proposal directly responds Action 10.3 of the Sutherland LSPS sets out an action to for Council to Collaborate with NSW land and Housing Corporation to support the renewal of social housing in Sutherland Shire. The proposal will support the renewal of the site to deliver new and increased social housing. The proposal also aligns with the aspirations of the LSPS to deliver increased affordable housing and increased residential density close to centres with new dwellings within easy walking distance of a public transport hub, community facilities, shops, services and employment.

Strategic document	Consistency
Sutherland Local Housing Strategy	The Sutherland Local Housing Strategy was adopted by Council in July and provides the overarching framework to guide housing in the Sutherland Shire. The strategy sets long-term goals for housing in the Sutherland Shire and supports the NSW Government's target to create 6,000 new homes by 2029. The Strategy identifies that an additional 1200 new dwellings are required each year to meet this target. The Strategy includes Action 3.2 which aims to 'concentrate density increases and changes in and around centres'. The proposal directly responds to this action as it will increase density in an identified low and mid rise housing area, adjacent to Southgate Shopping Centre. The Strategy also includes the following actions relevant to the proposal: • Action 4.3 work in partnership with Community Housing Providers, the not-for-profit sector, the State and Commonwealth Governments, the private sector, other councils and the financial sector to support affordable dwelling delivery. • Action 4.7 Support Land and Housing's priority social housing projects.

2.3 Cumulative Impacts

The site is zoned for high density residential development, is within a low and mid rise housing area and is in established urban area well-served by local services and public transport.

The proposal is expected to result in positive impacts through the provision of increased housing supply with 484 new dwellings, including 159 new social dwellings to meet the critical need for more social and affordable housing in the area.

The site is identified as suitable for increased density and housing in accordance with the low and mid rise housing provisions and is therefore suitable for increased residential development, given its well-located and accessible location. The proposed development is not expected to generate any additional impacts beyond those already anticipated through the implementation of the low and mid rise housing provisions.

A search of the Sutherland Council DA tracker and Major Projects website did not identify any recent major residential or mixed-use developments within the vicinity of the site, or development under construction.

The mitigation measures provided at Appendix C demonstrate that all potential impacts will be appropriately managed and mitigated. This includes construction management measures to ensure all construction related impacts are appropriately mitigated during the construction phase of the project.

A detailed construction management plan will be prepared prior to commencement of construction which will take into consideration any other construction works taking place in the vicinity. Refer to Section 6 and Mitigation Measures at Appendix C.

2.4 Analysis of Alternatives

In accordance with Section 192 of the *Environmental Planning and Assessment Regulation 2021* an analysis of feasible alternatives to the proposed development, including the consequences of not carrying out the development, is provided below.

2.4.1 Option 1 – Do Nothing

The 'Do Nothing' option is not a realistic or desirable outcome as it will not facilitate the renewal of the site to contribute to the delivery of increased housing supply and increase social housing.

The Site is within a low and mid rise housing area and the proposal aligns with the objectives to deliver more affordable, well-designed and well-located homes close to public transport, jobs and services. The 'Do Nothing' option would not achieve the objectives of the NSW Government through the low and mid rise housing reforms to increase housing within walking distance to centres and public transport.

The 'Do Nothing' option is inconsistent with the strategic objectives of the NSW Government and is not considered a feasible or justifiable option for this Site. Doing nothing would result in a missed opportunity to capitalise on the site's strategic and accessible location to provide increased supply of housing, including social housing, in Sylvania.

2.4.2 Option 2 – Alternative design

A number of alternative designs were considered through the design phase, and alternative options are considered in the Design Report at Appendix E.

The proposal has also been considered by the State Design Review Panel (SDRP) on two occasions with design refinements occurring to address matters raised by the SDRP.

2.4.3 Option 3 – The Proposal

The proposal as outlined in this SSDA is the preferred option as it will deliver increased residential housing and social housing while minimising environmental impacts to the Site and surrounding area.

The proposed development has resulted from a detailed design development process which has resulted in a considered design which provides for high quality renewal of the site for increased housing and social housing, allows for the efficient staging and delivery of social housing in the first stage of development, and delivers a high level of amenity for future residents and minimises impacts on the surrounding area.

The proposal is consistent with the land use and built form controls under the Sutherland LEP and Housing SEPP, with the exception of a variation to the maximum height control for part of the site which is addressed in a Clause 4.6 Report and discussed in Section X of this EIS.

The proposal is also generally consistent with the Apartment Design Guide and is generally consistent with relevant controls in the Sutherland Shire DCP.

The proposed development as outlined in this EIS provides the best outcome for the following reasons:

- It will deliver new housing, including social housing, within walking distance to public transport, jobs and local services.
- The proposal will deliver 484 high-quality apartments, that directly responds to the NSW Government strategic objectives and priorities for increasing housing, including social housing, in well-located areas.
- The proposal allows for the efficient and logical staging and servicing of the site to allow for the early delivery of social housing within the first stage of development.
- The proposed development delivers the highest level of internal amenity for future residents by optimising solar access, cross ventilation and maximising outlook to communal open space and landscaped areas for all residents.

- The proposal has been designed to mitigate flood risk, with all residential floor levels and basement entries located above the required flood planning levels.
- The proposed development minimises impacts on neighbouring properties and the public domain and has been carefully designed to minimise overshadowing and amenity impacts to neighbouring properties.
- The proposal prioritises the retention of high value trees on site, provides significant deep soil and tree canopy cover and generous landscaping and communal open space which exceed requirements.

3 Project Description

3.1 Project Overview

The application seeks approval for demolition of all structures and construction of eight residential buildings across the site to provide a total of 325 market dwellings and 159 social dwellings (484 total dwellings).

The proposed development will be staged development over two stages to enable the early delivery and construction of the social housing dwellings in the first stage of development.

Specifically, approval is being sought for the following:

Development of Stage 1/ Social Housing Lot

- Demolition, remediation, tree removal, excavation and site preparation works.
- Construction of two residential buildings comprising:
 - An eight storey and nine storey building with 159 social housing apartments, constructed over two levels of shared basement / ground level parking accessed from Pembroke Street.
- Associated landscaping, communal open space and public domain works.
- Extension and augmentation of infrastructure and services as required.

Development of Stage 2/ Market Housing Lot

- Demolition, remediation, tree removal, excavation and site preparation works.
- Construction of six residential buildings comprising:
 - Three nine storey buildings with 168 dwellings, constructed over four levels of shared basement parking (Market Building 1 – North).
 - An eight storey building with 52 apartments, constructed over three levels of basement level parking (Market Building 2 – South).
 - A seven storey and eight-storey building with 105 apartments, constructed over four levels of shared basement parking (Market Building 3 – West).
- Construction of new one-way access street from Florida Street.
- Associated landscaping, communal open space and public domain works.
- Extension and augmentation of infrastructure and services as required.
- Lot consolidation.
- Torrens subdivision to create two lots.

3.2 Project Details

A summary of the key project details is outlined in Table 5 below.

Table 5: Overall summary of project details

Project element	Summary of the project
Site Area	21,792 sqm
Land use	Residential flat buildings
Total GFA	44,848sqm

Project element	Summary of the project
Floor space ratio	2.05:1
Maximum height	33.05m
Number of apartments	A total of 484 apartments comprising: • 325 market apartments • 159 social apartments
Car parking spaces	Total of 733 car parking spaces, comprising: • Market: 641 spaces • Social: 92 spaces
Bicycle spaces	90 spaces
Landscape area	11,478sqm
Communal open space	8,022sqm
Deep soil	6,611sqm
Construction jobs	1,292 jobs
Estimated Development Cost	Refer to the EDC Report at Appendix Z.

3.3 Site Preparation

3.3.1 Demolition

The proposal includes demolition of all existing buildings and structures within each stage of development. Refer to demolition plan at Appendix F.

3.3.2 Earthworks

Excavation works will be required to accommodate the construction of one basement car park within Stage 1 and the construction of three basement car parks and new access road within Stage 2.

The proposed extent of excavation is detailed in the Civil Plans at Appendix L.

3.3.3 Remediation

Site remediation will be undertaken in accordance with the Remedial Action Plan (RAP) provided at Appendix W.

3.3.4 Tree Removal

A total of 127 trees are proposed to be removed to accommodate the proposed development. Of the proposed trees to be removed, 34% of have been assessed as having low retention value.

Further detail on the proposed tree removal and tree protection measures is provided in Section 6.5 and detailed in the Arboricultural Impact Assessment at Appendix I.

3.4 Built Form and Layout

The architectural design for the site is detailed in the Design Report at Appendix E and Architectural Plans at Appendix F prepared by BVN Architects.

3.4.1 Site Layout and Building Design

The proposed development is designed as eight residential buildings constructed over four shared basements.

The four development components with consolidated basements are referred to as Building 1, Building 2, Building 3 and Social Housing Building. The general site arrangement and building layout is shown Figure 3 and Figure 4.



Figure 3 Proposed building layout

The proposed buildings are designed around a series of interconnected landscaped spaces and communal open space areas that provides a network of open spaces across the site. Publicly accessible communal open space and landscaping is proposed across the site, to provide a high level of amenity for future residents.

The retention of existing significant trees on the site has central to the siting and placement of buildings on the site. The proposed development provides generous street setbacks to prioritise the retention of street trees and introduces new planting and landscaping along all of the site's edges to provide a high-quality streetscape.

The proposed buildings have been designed to maximise opportunities to retain high value trees, increase landscaping and open space within the site, and to ensure the arrangement of buildings maximises solar access and amenity to apartments and communal open space. The buildings are also aligned to ensure sightlines across the site, east to west and north to south.

Due to the slope of the site from north to south, the lower ground level and basement level for Building 2 and the Social Building are designed as basement and semi basement parking and servicing at ground level.

The proposed development aims to limit the distinction between social and market housing within the development and provide a tenure blind approach. The social housing component is located at

the southern end of the site to ensure the social building can be delivered in the first stage of development.

The Design Report prepared by BVN at Appendix E provides further detail on the site analysis and key design moves which have informed the design response.

The proposed development will result in a total GFA of 44,848sqm across all buildings and a maximum building height ranging from 28.15m to 33.05m across the site. A breakdown of the proposed height by building is provided in Table 6 below.

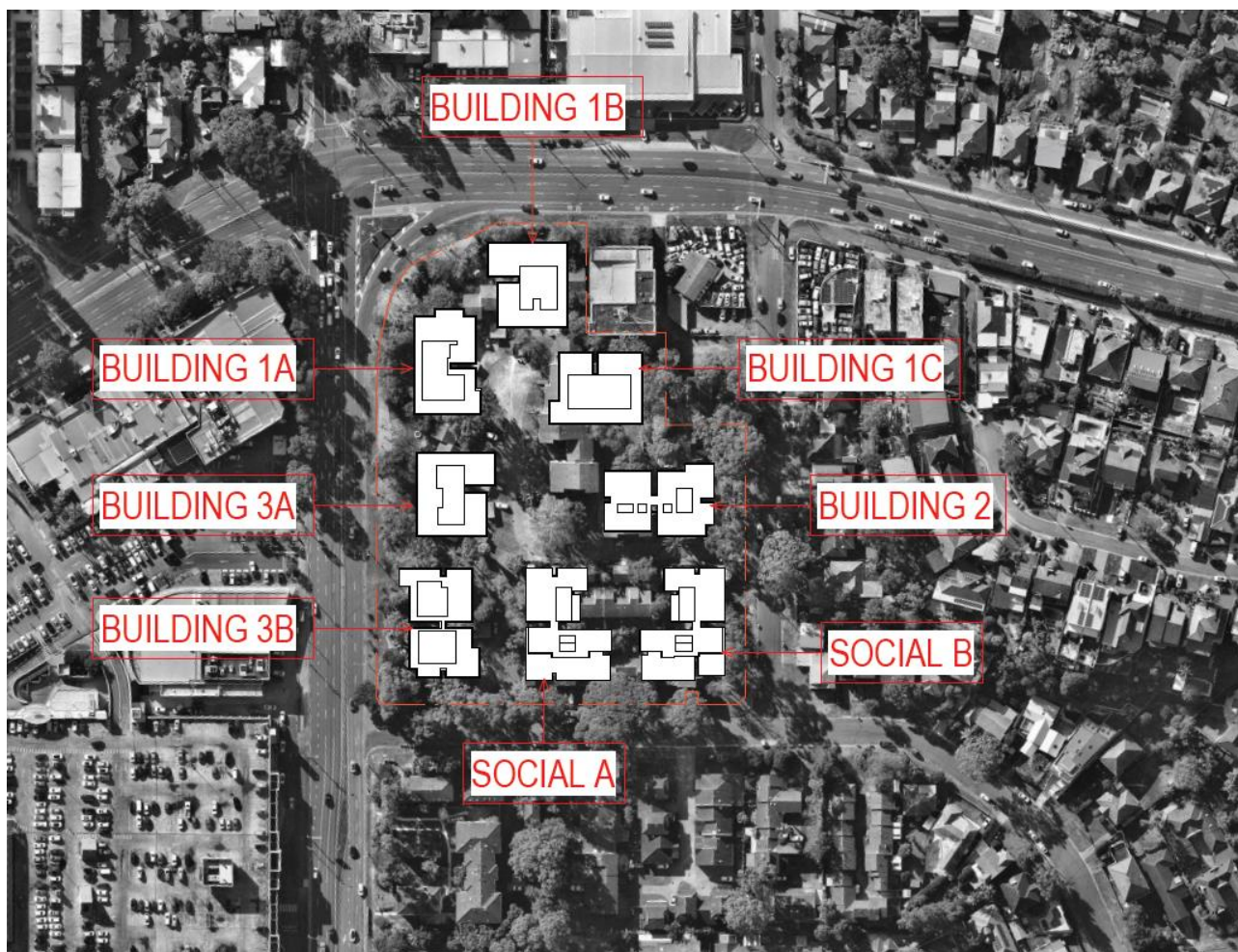


Figure 4 Proposed arrangement of buildings

A breakdown of the proposed buildings is provided in Table 6.

Table 6 Proposed buildings

Building	Building reference	Number of dwellings	Height in storeys	Height in metres	Residential use
Building 1 - North	Building 1A	168	9 storeys	32.55m (RL 48.69)	Market dwellings
	Building 1B		9 storeys	30.55m (RL 48.69)	
	Building 1C		9 storeys	32.4m (RL 48.69)	
Building 2 - South	Building B	52	8 storeys	30.98m (RL 47.50)	Market dwellings
	Building 3A	105	8 storeys	29.7m (RL 44.78)	

Building 3 – West	Building 3B		7 storeys	28.15m (RL 39.42)	Market dwellings
Social Building	Social A	159	9 storeys	33.05m (RL 46.90)	Social housing
	Social B		8 storeys	31.7m (RL 46.90)	



Figure 5 Proposed view looking north to Building 1 (Source: BVN)



Figure 6 Proposed view looking south to Building 2 and Social Building (Source: BVN)



Figure 7 Proposed view of Social Building and Building 2 on Pembroke Street (Source: BVN)

3.4.2 Apartment Mix

The proposed development will accommodate a total of 484 apartments comprising 159 social and 325 market dwellings. The following apartment mix is proposed.

Table 7 Proposed apartment mix

Development	Building reference	Apartment mix
Building 1 - North	Building 1A	1 bedroom – 24 (14%) 2 bedroom – 123 (73%) 3 bedroom – 21 (13%)
	Building 1B	
	Building 1C	
Building 2- South	Building B	1 bedroom – 7 (13%) 2 bedroom – 31 (60%) 3 bedroom – 14 (27%)
Building 3 – West	Building 3A	1 bedroom – 21 (20%) 2 bedroom – 64 (61%) 3 bedroom – 20 (19%)
	Building 3B	
Social Building	Social A	1 bedroom – 77 (48%) 2 bedroom – 60 (38%) 3 bedroom – 22 (14%)
	Social B	

3.4.3 External Materials and Finishes

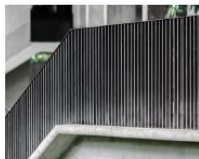
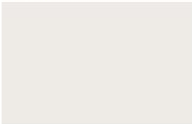
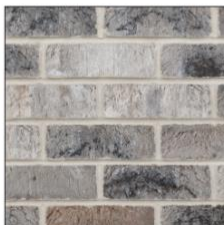
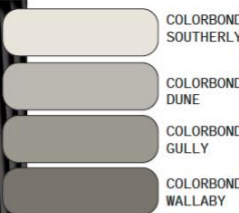
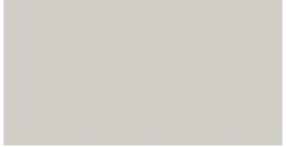
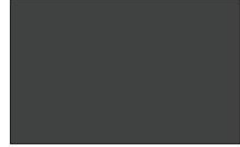
The proposed facade strategy and materials provide a site-wide response while creating a series of related and complementary clusters of buildings that break down the scale of the development into smaller villages around a series of connected green spaces. A consistent articulation of vertical slots also breaks down the building masses into discrete volumes.

The proposed building form, articulation and architectural language of the buildings within each of the three areas are differentiated to provide diversity across the large site, however, a common use of brick materiality and hues that reference the clays and stone found locally provides consistency.

The use of a consistent approach to architectural elements and colours across the site ties the buildings together, while maintaining a unique identity to each cluster. Across the site a masonry plinth mitigates level differences, lifting the buildings up to the flood planning levels and grounding each of the buildings into the sloping topography.

The proposed materials and finishes are provided at Table 8 and further detailed in the Design Report at Appendix E.

Table 8 Proposed materials

Building	Proposed materials
Building 1 – North 	   BRICK; TO MATCH AUSTRAL LA PALOMA WHITE   PAINTED CONCRETE SLAB METAL PALISADE BALUSTRADE METAL FRAMING & BALUSTRADE
Village Green Cluster – Social Housing and Building 2 	  STANDING SEAM CLADDING SIMILAR TO LYSAGHT ENSEAM COLORBOND ARIES OR EQUIV PLEAT CLADDING; STRATCO NINELINE OR EQUIVALENT    METAL WALL CLADDING TO BALCONY INTERIORS; LYSAGHT 'EXPRESSION' INTERLOCKING WALL SYSTEM OR EQUIV. COLOUR SIMILAR TO COLORBOND ARIES OR EQUIVALENT BRICK; SAN SELMO SMOKED OPAQUE SLATE OR EQUIV HIT & MISS AND TEXTURED BRICKWORK TO THE MASONRY PLINTH  COLORBOND SOUTHERLY COLORBOND DUNE COLORBOND GULLY COLORBOND WALLABY
Building 3 – West 	  BRICK; SAN SELMO SMOKED OPAQUE SLATE OR EQUIV METAL PALISADE BALUSTRADE   PAINTED CONCRETE SLAB METAL FRAMING & BALUSTRADE

3.5 Landscaping and Communal Open Space

The proposed development provides a series of connected central green spaces to form network of communal spaces across the site. These spaces are proposed as publicly accessible spaces with diverse uses and programming to create active and vibrant outdoor areas. The proposed landscape design and location of communal spaces, provides a passive delineation of spaces that leverage the site's topography to subtly define communal areas.

The proposed development provides generous landscaped areas and communal open space across the site. This includes a total area of 8,022sqm of communal open space across the site, which is equivalent to 37% of site area. Of this, the proposed development includes 1,237sqm of communal open space within the Social Building which is 25% of the proposed Stage 1 / social housing lot area.

As detailed in the Landscape Plans prepared by Turf at Appendix H, the proposed development provides a generous landscaped communal areas distributed across the site as shown in Figure 8.



Figure 8 Proposed landscape plan (Source: Turf)

Key features of the landscape design include:

- A central, publicly accessible communal park and playground located at the centre of the site. The park incorporates an existing London Plane Tree, creating a shaded and welcoming space for gatherings, picnicking, and recreation. The fenced playground, planted with evergreen

trees, offers a variety of play experiences in a safe and protected environment. Seating edges integrated along footpaths provide multiple resting points, supporting inclusive use for people of all ages and abilities.

- A connected network of accessible footpaths, open spaces, building lobbies, and a new shared zone, ensuring seamless pedestrian movement throughout the site.
- The north-west entry plaza provides a key arrival experience to the site, offering seating and a welcoming environment. Planted terrace gardens are integrated into the steps, creating a lush and verdant transition that reinforces the connection between publicly accessible communal open space and the residential cluster.
- An east–west open space spine features a paved eastern entry and a series of planted seating terraces from Florida Street.
- Courtyard spaces within Stage 1 / Social Building include outdoor BBQ and lawn areas, and seating walls and planted edges subtly define the interface between social building and publicly accessible open space areas without the need for fencing.
- The retention of key significant trees within and around the site contributes to the site's character and amenity, and enhanced landscaped setbacks mitigate traffic noise from surrounding roads.

Refer to the Landscape Report at Appendix G and Landscape Plans at Appendix H.



Figure 9 View of the communal plaza at Building 1 – North (Source: Turf)



Figure 10 View of Social Building courtyard (Source: Turf)



Figure 11 View of the landscaped entry from Florida Street (Source: Turf)

3.6 Access and Parking

A Traffic Impact Assessment has been prepared by JMT Consulting, which is provided at Appendix J and details the access and parking arrangements for the proposed development.

The key components of the proposed access, parking and servicing arrangements is provided below.

3.6.1 Vehicle Access

Access to the southernmost building (Social Building) fronting Pembroke Street is proposed to be accessed directly from Pembroke Street.

The proposed access to Building 1, Building 2 and Building 3 is proposed via an internal shared access road, primarily running one-way with entry from Florida Street and exit via Pembroke Street. The proposed vehicular access arrangements are indicated in Figure 12.

Coral Tree Place is the primary access through the site and is to be retained during the construction of Stage 1 of the development to maintain access to all dwellings on site.

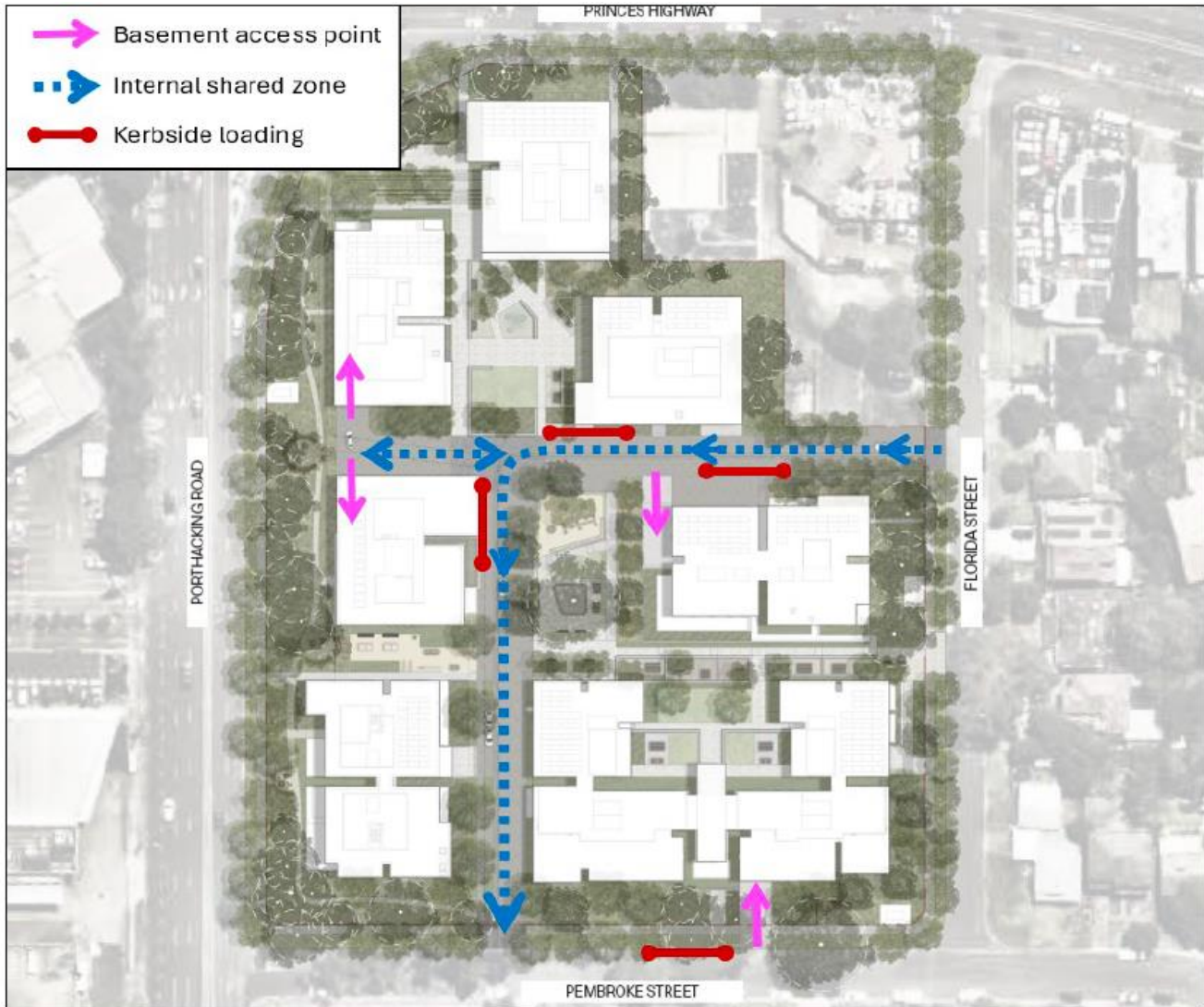


Figure 12 Proposed site access (Source: JMT Consulting)

3.6.2 Pedestrian Access

The proposal includes new pedestrian footpaths on all surrounding street frontages to significantly improve pedestrian accessibility in the vicinity of the site.

The proposal includes internal pathways for resident access to provide clear and direct access to all buildings, and the proposed internal road is designed as shared zone to allow for pedestrian access through the site.

The internal pathways and introduction of a 10km/h low speed shared zone will support pedestrian movements through and within the site.

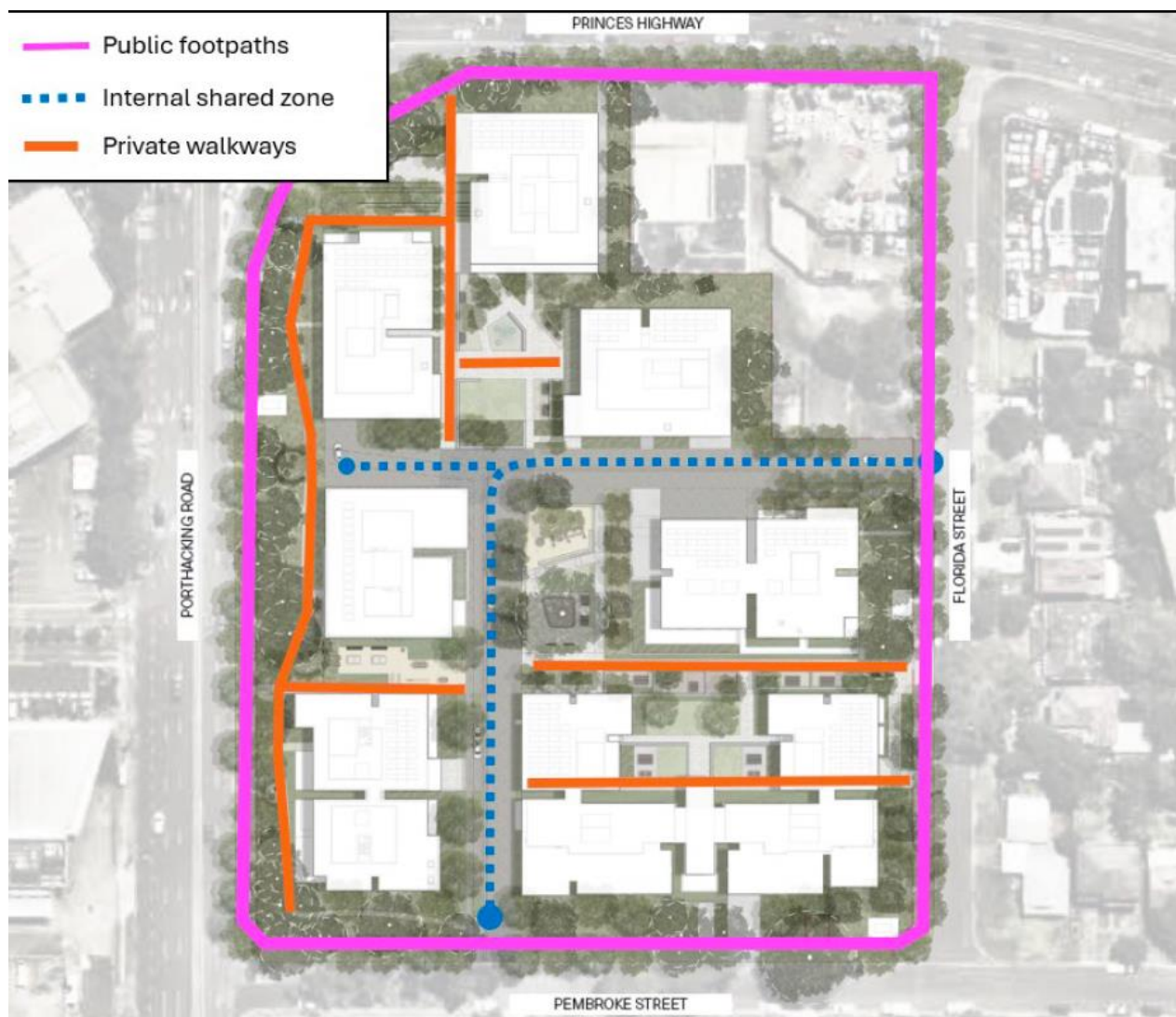


Figure 13 Proposed pedestrian access (JMT Consulting)

3.6.3 Car Parking

A total of 733 car parking spaces is proposed across the proposed development. A breakdown of the proposed car parking by building is provided in Table 9.

Table 9 Proposed car parking

Development	Building reference	Proposed car parking
Building 1 - North	Building 1A	- Resident – 284 spaces - Visitor – 46 spaces - Car wash – 2 spaces
	Building 1B	
	Building 1C	
Building 2- South	Building B	- Resident – 90 spaces - Visitor – 12 spaces
Building 3 – West	Building 3A	- Resident – 177 spaces - Visitor – 29 spaces - Car wash – 1 space
	Building 3B	
Social Building	Social A	

	Social B	Resident – 92 spaces
Total		733 spaces (including 3 car wash spaces)

3.6.4 Bicycle Parking

The proposal provides bicycle storage parking areas for a total of 90 bicycles across the proposed development. A breakdown of bicycle parking by building is provided in Table 10.

Table 10 Proposed bicycle parking

Development	Building reference	Bicycle parking
Building 1 - North	Building 1A	33 spaces
	Building 1B	
	Building 1C	
Building 2- South	Building B	8 spaces
Building 3 – West	Building 3A	22 spaces
	Building 3B	
Social Building	Social A	27 spaces
	Social B	
Total		90 spaces

3.6.5 Loading and Servicing

The loading strategy for the proposal involves the construction of a new private access road and on street loading zones immediately in front of the proposed buildings to accommodate on-street council waste collection vehicles and other delivery vehicles.

This on-street loading zone can accommodate a range of service vehicles including delivery vehicles as well as 10.5m long Sutherland Council waste collection vehicles.

On-street Council waste collection is proposed to occur from waste holding areas and dedicated loading zones on the new internal road.

Loading and servicing for the social housing buildings (within Stage 1) will be undertaken via Pembroke Street. Council Waste collection vehicles will access the waste holding rooms via on-street vehicle parking along Pembroke Street.

3.7 Stormwater

The Stormwater Management Plan and Civil Plans prepared by Mott MacDonald at Appendix L details the proposed stormwater infrastructure for the proposed development.

An existing stormwater pipe transverses the western portion of site and is proposed to be retained and realigned within the proposed new access road (refer to Figure 14).

Four on-site detention (OSD) tanks are proposed across the site to manage stormwater flows. The proposed OSD tanks are proposed within the basement levels of Building 1B, Building 2, Building 3A and the social building as shown in Figure 14.

The proposed internal reserve road, along which new stormwater pits is proposed to be constructed as part of the road drainage system. The stormwater pits will serve as discharge points for the OSD tanks in Building 1B and Building 2.

The OSD tanks in Building 2 and the Social Building are proposed to connect to the existing stormwater pit on Florida Street.

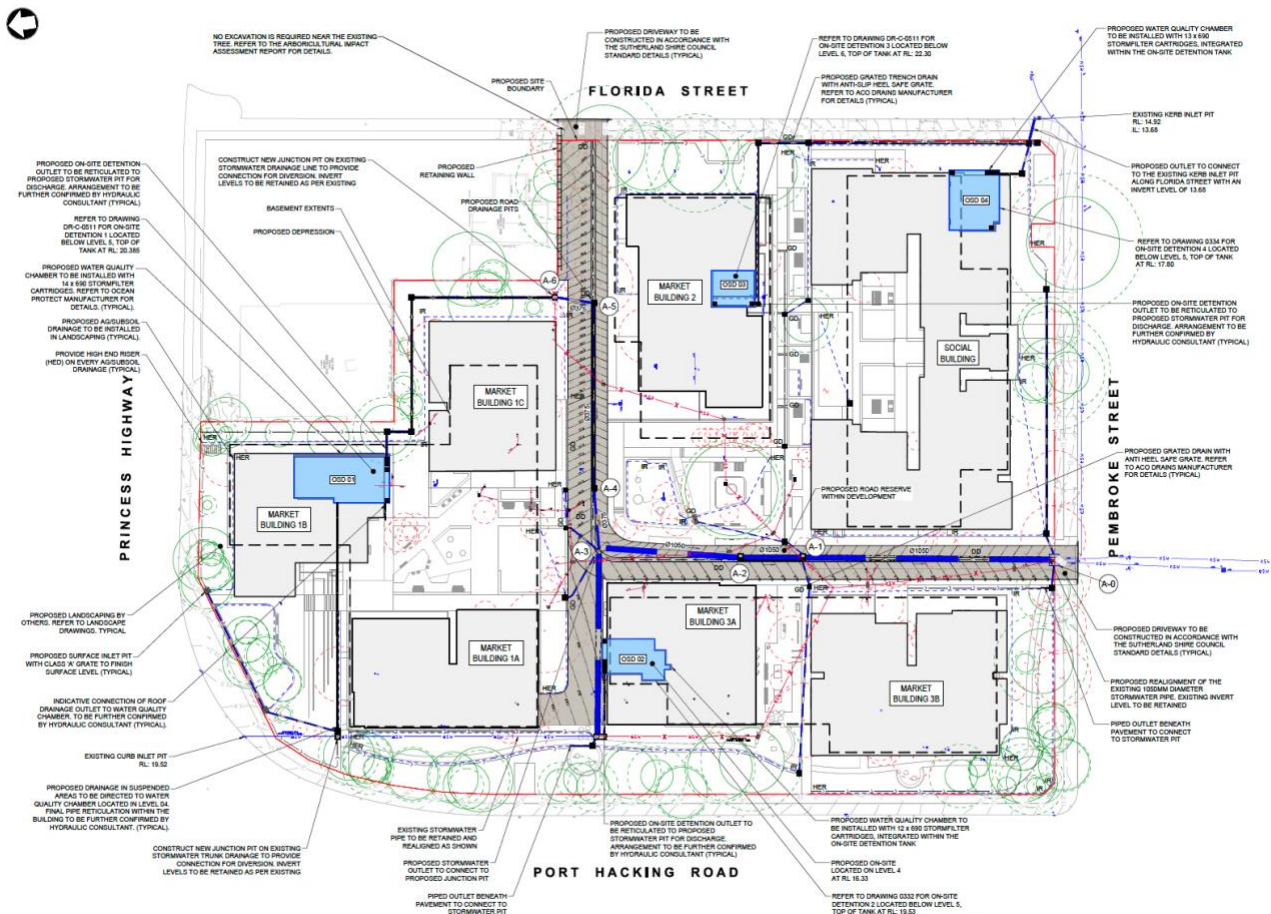


Figure 14 Proposed drainage plan (Source: Mott MacDonald)

3.8 Construction Staging

The construction of the development will be staged to allow for relocation of existing social housing tenants and the proposal to be undertaken in two development stages as follows and illustrated at Figure 15.

- Stage 1 (social lot area) comprises construction of the social housing buildings and communal open space within the proposed social housing lot.
- Stage 2 (market lot area) comprises the remainder of the development being construction of six private market buildings, communal space and new private access road (shared road reserve).

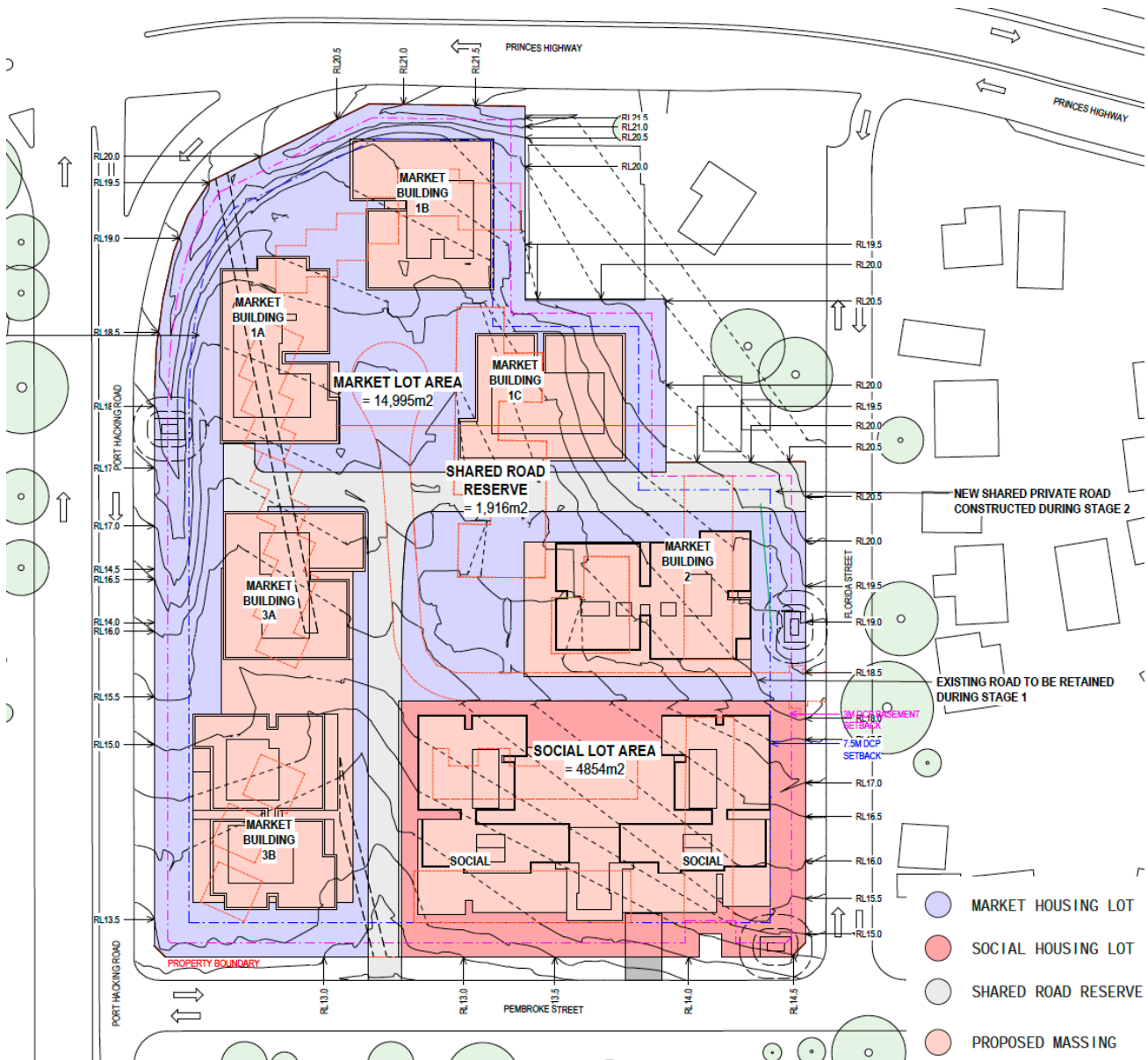


Figure 15 Proposed development – stages

Construction of each stage will be managed across several construction certificate stages which may include the following and will be subject of the requirements of delivery partners and/or building contractors:

- CC1: Demolition
- CC2: Site preparation and excavation
- CC3: Building envelope and services
- CC4: Fit out
- CC5: Landscaping and external works.

A detailed staging plan will be prepared as part of the Construction Management Plan (CMP) to be submitted prior to the commencement of works.

3.9 Management of affordable housing

Homes NSW (incorporating LAHC) is the NSW Government's social housing delivery authority and is responsible for managing the largest social housing portfolio across the state.

Homes NSW is committed to working in partnership with registered community housing provider (CHP) to increase and renew the supply of the social housing.

For this project, Homes NSW will be partnering with a registered CHP who will develop and manage the affordable housing component for at least 25 years.

4 Statutory framework

4.1 Power to grant approval

Development consent is sought under 'Division 4.7 – Development that is State Significant Development' of the EP&A Act. Section 4.36(2) of the EP&A Act states that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) sets out general categories of development which is declared State significant development (SSD).

Clause 26 of Schedule 1 states that development carried out by or on behalf of the Aboriginal Housing Office or the Land and Housing Corporation is SSD if the development has an EDC of more than \$30 million or will result in more than 75 dwellings.

The proposed development is being carried out by NSW LAHC (operating as Homes NSW), with an EDC of \$X million (excluding GST) and will result in more than 75 dwellings. Therefore, the proposed development is SSD (refer to Estimated Development Cost Report at Appendix Z).

4.2 Permissibility

The site is zoned R4 High Density Residential under the *Sutherland Local Environmental Plan 2015* (Sutherland LEP) (refer to Figure 16). Residential flat buildings are permitted with consent in the R4 zone. Accordingly, the proposed development is permissible with consent.

The following maximum FSR and height controls currently apply under the Sutherland LEP.

- Floor space ratio: 1.6:1
- Height of buildings: 16m.

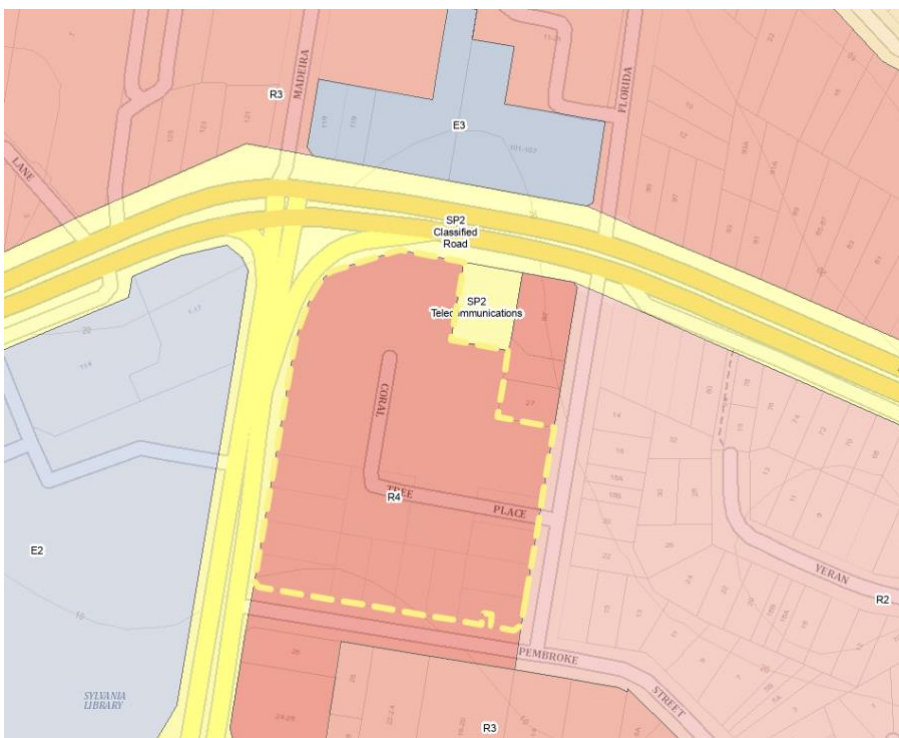


Figure 16 Land use zoning (Source: NSW Planning Portal)

4.3 State Environmental Planning Policy (Housing) 2021

The low and mid rise housing provisions under Chapter 6 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) apply to the site allowing for the following:

- Maximum Building Height: 22m
- Maximum FSR: 2.2:1.

Chapter 2, Part 2, Division 1 of the Housing SEPP also sets out bonus provisions for affordable housing which apply in addition to the low and mid rise housing controls in Chapter 6 of the Housing SEPP. The site is within an accessible area, and the bonus provisions apply.

The bonus provisions include:

- 30% floor space and height bonus where 15% of housing is affordable housing (Section 16)

Section 15B (2) of the Housing SEPP sets out that residential development carried out by or on behalf of the Land and Housing Corporation is taken to be used for the purposes of affordable housing. Therefore, the proposed development is taken to be for the purpose of affordable housing.

The maximum permissible height and FSR for the site under the Housing SEPP provisions is detailed in Table 2.

Table 11 Summary of the permissible height and FSR

	Sutherland LEP	Low and mid-rise provisions	30% bonus Housing SEPP	Maximum height under Housing SEPP	Maximum Proposed
Building height	16m	22m	+6.6m	28.6m	33.05m
Floor space ratio	1.6:1	2.2:1	+0.66:1	2.86:1	2.05:1

The proposal is significantly below the maximum permissible FSR.

The proposal results in a height exceedance of up to 4.45m for the Social Building in Stage 1 and a height exceedance up to 3.95m for buildings in Stage 2. A breakdown of the proposed building height by building is provided in Section 6.1.

The height exceedance is required to respond to the site's topography, accommodate the required minimum flood planning levels and to accommodate lift overruns and plant which is addressed in the Clause 4.6 Report at Appendix D and discussed in Section 6.1 of this EIS.

The *In-fill Affordable Housing Practice Note (the Practice Note) and Planning Circular for In-fill Affordable Housing (PS- 23-003)*, issued by DPHI, dated 14 December 2023 is applicable to the project, this circular encourages the flexible application of development controls in light of realising the public benefit relating to the delivery of affordable housing.

An assessment against the in-fill affordable housing provisions in accordance with Part 2, Division 1 of the Housing SEPP is provided in the Statutory Compliance Table at Appendix B.

4.4 Other approvals

4.4.1 Consistent approvals

The following approvals or authorisations are required to facilitate the proposed development. In accordance with Clause 4.42 of the EP&A Act, the following authorisations cannot be refused if the project is approved and must be substantially consistent with the approval.

Approval	Approval required
Fisheries Management Act 1994 – aquaculture permit under section 144	No
Coal Mine Subsidence Compensation Act 2017 – approval under Section 22	No
Mining Act 1961 - mining lease	No
Petroleum (onshore) Act 1991 – production lease	No
Protection of Environmental Operations Act 1997 – environmental protection licence	No
Roads Act 1993 – consent under Section 138	Yes, a new vehicular access is proposed from Pembroke Street and Florida Street.
Pipelines Act 1967 – license requirements	No

4.4.2 Approvals not required for State Significant Development

Section 4.41 of the EP&A Act has the effect that several approvals, which would have otherwise been required if the project were not SSD, are not required. These are set out in the table below along with consideration of whether these approvals would have otherwise been required if the development was not SSD.

Table 12: Section 4.41 Approvals not required

Approval	Approval otherwise required
Fisheries Management Act 1994 – permits under section 201, 205 or 219)	No
Heritage Act 1977 – an approval under Part 4, or an excavation permit under section 139	No
National Parks and Wildlife Act 1974 – an Aboriginal heritage impact permit under section 90	No
Rural Fires Act 1997 – a bush fire safety authority under Section 100B	No
Water Management Act 2000 – a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91	Yes, the basement excavation is expected to intercept groundwater. See discussion in Section 6.13.

4.5 Pre-conditions to exercising the Power to Grant Consent

The following section identifies pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent.

Table 13: Preconditions to exercising power to grant approval

Legislation	Pre-condition	Section in EIS
Biodiversity Conservation Act 2016		
Section 7.9	<u>Biodiversity Development Assessment Report</u> A development application for SSD is to be accompanied by a Biodiversity Development Assessment Report, unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.	Statutory Compliance Table at Appendix B and BDAR Waiver at Appendix S.
State Environmental Planning Policy (Transport and Infrastructure) 2021		
Section 2.48	<u>Development near electricity network</u> Requires a referral to the energy supply authority prior to approval for development which may impact on an electricity transmission or distribution network including where development would occur within 5m of an overhead electric power line. It requires the consent authority to take into consideration any response to that notice before granting consent to a development.	Relevant referrals will be undertaken as part of the notification given the location of above ground power lines adjacent to the site on Banks Avenue.
Section 2.119	<u>Development fronting a classified road</u> Sets out that development consent must not be granted to development with frontage to a classified road: unless the safety, efficiency and operation of the road has been considered and the development minimises any potential traffic impacts on the development where practicable access is from another road.	Transport Impact Assessment (Appendix J)
Section 2.120	<u>Impact of road noise</u> Requires development to comply with relevant noise criteria and consideration of the Development near Rail Corridors and Busy Roads Interim Guideline for development on land in or adjacent to a road corridor with an annual average daily traffic volume of more than 20,000 vehicles.	Noise and Vibration Impact Assessment (Appendix T) and Statutory Compliance Table (Appendix B)
Section 2.122	<u>Traffic generating development</u> Section 2.122 applies to traffic generating development and requires the consent authority to give written notice to TfNSW and take into consideration any response to that notice. The Proposal meets the definition of traffic generating development as it is for more than 75 dwellings on a site with site with access to a road that that connects to a classified road.	Statutory Compliance Table at Appendix B and Transport Impact Assessment (Appendix J).
State Environmental Planning Policy (Housing) 2021		
Section 147	Development consent must not be granted to residential apartment development unless the consent authority has considered the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set out in Schedule 9, the Apartment	Design Report (Appendix E)

Legislation	Pre-condition	Section in EIS
	Design Guide, and any advice received from a design review panel within 14 days after the consent authority referred the development application to the panel.	
State Environmental Planning Policy (Resilience and Hazards) 2021		
Section 4.6	<u>Remediation of land</u> A consent authority must not consent to the carrying out of development unless: - it has considered whether the land is contaminated, and - if the land is contaminated that that it will be suitable for the purpose for which the development is proposed to be carried out, and - if remediation is required, the consent authority is satisfied that the land will be remediated before the land is used for that purpose.	Detailed Site Investigation (Appendix V), Remedial Action Plan at Appendix W, and Statutory Compliance Table at Appendix B.
State Environmental Planning Policy (Sustainable Buildings) 2022		
Section 2.1	<u>Embodied Energy</u> Sets out development consent must not be granted for certain development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.	ESD Report (Appendix XM) and Statutory Compliance Table at Appendix B.
State Environmental Planning Policy (Biodiversity and Conservation) 2021		
Section 6.6	<u>Regulated catchments</u> Development consent must not be granted to development in a regulated catchment unless the consent authority is satisfied that the effect on water quality will be neutral or beneficial and the impact of water flow will be minimised. The site is within the Georges River Catchment which is a regulated catchment.	Integrated Water Management Plan (Appendix L) and Statutory Compliance Table (Appendix B)
Sutherland Local Environmental Plan 2015		
Section 5.21	<u>Flood planning</u> Requires the consent authority to consider whether the development is compatible with flood risk, whether it will adversely affect flood behaviour, the safe occupation or evacuation in a flood event, or the environment and incorporates appropriate measures to manage risk to life.	Flood Risk and Impact Assessment (Appendix K) and Statutory Compliance Table at Appendix B.
Section 5.22	<u>Special flood considerations</u> Requires the consent authority to consider whether the development will affect the safe occupation and evacuation of people in a flood event, and incorporates appropriate measures to manage risk of life in the event of a flood and if the development will adversely affect the environment in the event of a flood.	Flood Risk and Impact Assessment (Appendix K) and Statutory Compliance Table at Appendix B.
Clause 6.4	<u>Stormwater management</u> Requires the consent authority to be satisfied that stormwater impacts and water sensitive urban design measures have been addressed.	Water Management Plan (Appendix L) Statutory

Legislation	Pre-condition	Section in EIS
		Compliance Table at Appendix B.

4.6 Mandatory matters for consideration

The following section identifies matters that the consent authority is required to consider in deciding whether to grant consent to a development application.

Table 14: Mandatory consideration

Legislation	Matters for consideration	Section in EIS
Environmental Planning and Assessment Act 1979		
Section 1.3	Relevant objects of the Act - To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources - To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment - To promote the orderly and economic use and development of land - To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats, - to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage) - To promote good design and amenity of the built environment - To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.	Statutory Compliance Table (Appendix B).
Section 4.15	Relevant Environmental Planning Instruments: - State Environmental Planning Policy (Planning Systems) 2021 - State Environmental Planning Policy (Housing) 2021 - State Environmental Planning Policy (Transport and Infrastructure) 2021 - State Environmental Planning Policy (Resilience and Hazards) 2021 - State Environmental Planning Policy (Biodiversity and Conservation) 2021 - State Environmental Planning Policy (Sustainable Buildings) 2022 - Sutherland LEP 2015	Statutory Compliance Table (Appendix B).
	Relevant proposed Environmental Planning Instruments	Not applicable
	Relevant planning agreement	Not applicable
	Development control plans	Not applicable

Legislation	Matters for consideration	Section in EIS
	Section 2.10 of the Planning Systems SEPP sets out that DCP's do not apply to SSD. However, the Sutherland DCP has been considered at Appendix X.	
	The regulation (where they prescribe matter related to Section 4.15)	Statutory Compliance Table at Appendix B.
	The likely impacts of the development (environmental, social and economic)	Section 6
	Suitability of the site for development	Section 7
	Any submissions made in accordance with the EP&A Act.	To be considered as part of the assessment process.
	The public interest	Section 7
State Environmental Planning Policies (SEPPs)		
State Environmental Planning Policy (Housing) 2021	<u>Chapter 6 – Low and mid rise housing</u> Chapter 6 of the Housing SEPP applies to development within a low and mid rise housing area sets out non-discretionary development standards for development within 400m of an identified centre. The provisions in Chapter 6 apply to the site and allows apply the following maximum built form controls: • Height of buildings: 22m • FSR: 2.2:1	Statutory Compliance Table at Appendix B.
	<u>Chapter 2 – Infill Affordable Housing</u> The proposal follows the in-fill affordable housing provisions outlined in Chapter 2, Part 2, Division 1, of the Housing SEPP, which allows for additional height and floor space for projects which include affordable housing. The bonus provisions as discussed in Section 4.3 apply the following maximum built form controls: • Height of buildings: 28.6m • FSR: 2.86:1 The provisions also contain non-discretionary development standards and design requirements for affordable housing which are addressed in the Statutory Compliance Table at Appendix B.	Section 4.3 and 6.1 and Statutory Compliance Table at Appendix B.
	<u>Chapter 4 – Design of residential apartment buildings</u> Chapter 4 of the Housing SEPP applies to development for the purposes of residential flat buildings of at least 3 storeys and if the building contains at least 4 dwellings. Section 147 sets out that development consent must not be granted to residential apartment development unless the consent authority has considered the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set	Design Report at Appendix E.

Legislation	Matters for consideration	Section in EIS
	out in Schedule 9, the Apartment Design Guide, and any advice received from a design review panel.	
State Environmental Planning Policy (Sustainable Buildings) 2022	<u>BASIX</u> Chapter 2 of the Sustainable Buildings SEPP applies to residential development including standards for BASIX development.	ESD Report (Appendix M), BASIX Certificate (Appendix N).
Local Environmental Plans		
Sutherland LEP 2015	- Objectives and land uses for R4 zone - Clause 4.3 Height of buildings - Clause 4.4 Floor space ratio - Clause 5.10 Heritage conservation - Clause 6.1 Acid sulfate soils - Clause 6.2 Earthworks - Clause 6.14 Landscaped area in certain residential, employment and conservation and waterway zones - Clause 6.16 Urban design - general - Clause 6.17 Urban design – residential accommodation	Statutory Compliance Table (Appendix B)

5 Engagement

5.1 Engagement Carried Out

A Consultation Report prepared by Homes NSW is provided at Appendix Q and provides details on the consultation and communication activities that have been undertaken to inform the proposal including feedback provided and how this has been addressed in relation to the proposed development.

5.1.1 Community consultation

The applicant has carried out consultation with community stakeholders as follows:

- Local residents through a notification letter distributed to 631 surrounding properties with project information and an invite to attend community drop-in session.
- A community drop-in session was held on 18 September 2025 from 5.00pm to 7.00pm, at the Sylvania Community Centre.
- Local aboriginal community through a Walk on Country held 17 July 2025.

Details of the consultation activities carried out with community stakeholders are provided in the Consultation Report at Appendix Q.

5.1.2 Government Agency Consultation

The applicant and project team have carried out consultation with key government stakeholder groups including:

- Sutherland Shire Council
- Department of Planning, Housing and Infrastructure (DPHI)
- Government Architect NSW
- Transport for NSW
- Member for Miranda (Eleni Petinos)

Further details of the consultation activities carried out with Government stakeholders are provided in the Consultation Report at Appendix Q.

Sutherland Shire Council

The proposal has been informed by consultation with Sutherland Shire Council with an initial project meeting held on 21 May 2025 with representatives from Homes NSW, Council's assessment and strategic planning teams, and the project consultant team.

Additional engagement was undertaken with Sutherland Shire Council in relation to technical matters including waste management, flooding, stormwater and servicing to inform the proposal. A pre-lodgement briefing was also held on 11 September 2025.

Further consultation on the proposed development will be undertaken with Sutherland Shire Council as part of the exhibition of the EIS.

State Design Review Panel

The proposal has also undergone two design reviews with the Government Architects NSW State Design Review Panel (SDRP) held on 5 September and 3 October 2025 with representatives from the project design team and Homes NSW.

Key findings and outcomes from the design reviews are provided in the Design Report at Appendix Q.

5.2 Exhibition and Assessment

Following submission of this application, DPHI will exhibit the EIS and supporting technical reports on the Major Projects NSW Website and invite submissions from government agencies, Council and the community on the proposal.

This will provide the opportunity for further community, Council, and agency feedback on the proposal.

Following exhibition, any issues raised in submissions will need to be addressed. DPHI may request the Proponent prepare a Submissions Report to respond to the issues raised during the exhibition period. The Proponent will continue to liaise with DPHI and key stakeholders during assessment process.

6 Assessment and Mitigation of Impacts

6.1 Built Form and Urban Design

The proposed development has been designed to respond the site conditions and site constraints to establish a high-quality social housing renewal project. The proposed buildings have been carefully planned and designed to maximise the retention of high value trees, enhance open space and landscaping to create a series of budlings centred around a network of generous new communal open spaces.

The proposal includes generous street setbacks to provide for tree retention, generous landscaped setbacks on all site frontages to integrates with the surrounding context, and the proposed buildings have been aligned to provides new through site connections and enhanced permeability.

The site is in an area of planned increased density, with surrounding areas envisaged to transition to higher density residential buildings of up to six storeys in the short to medium term in accordance with the low and mid rise housing provisions.

The proposed development has been carefully designed to balance the existing and future context and to ensure the proposal maintains a high level of amenity for neighbouring properties, while recognising surrounding sites may redevelop in the future for higher density residential development.

The proposed development has been designed to maximise residential amenity and reduce any amenity impacts to neighbours. The proposal has considered key site planning requirements including building separation, solar access, cross ventilation, communal open space and deep soil in accordance with the Apartment Design Guide (ADG). For further information refer to the Architectural Plans at Appendix F and the Design Report at Appendix E.

The proposed development is generally compliant with the ADG as detailed in the Design Report (Appendix E) and generally compliant with relevant controls of the Sutherland DCP as detailed in the Statutory Compliance Table (Appendix B).

6.1.1 Building Height

The maximum height of building control fir the site in accordance with the Housing SEPP is 28.6m.

The proposed development proposes eight buildings with a maximum height ranging from 28.15m to 33.05m. A breakdown of the proposed building heights by building is provided in Table 15.

The proposed development seeks a variation of the maximum height control of 28.6m, with a maximum exceedance of up to 4.45m (15.6%). The extent of exceedance to the height control ranges from 1.1m (3.8%) to 4.45m (15.6%) across the proposed buildings. The extent of the height exceedance across the site is shown in Figure 17.

Table 15 Proposed building heights

Development	Building reference	Maximum building height	Proposed exceedance
Building 1 - North	Building 1A	32.55m	3.95m (13.8%)
	Building 1B	30.55m	1.95m (6.8%)
	Building 1C	32.4m	3.8m (13.3%)
Building 2- South	Building B	30.98m	2.38m (8.3%)

Building 3 – West	Building 3A	29.7m	1.1m (3.8%)
	Building 3B	28.15m	Compliant
Social Building	Social A	33.05m	4.45m (15.5%)
	Social B	31.7m	3.1m (10.8%)

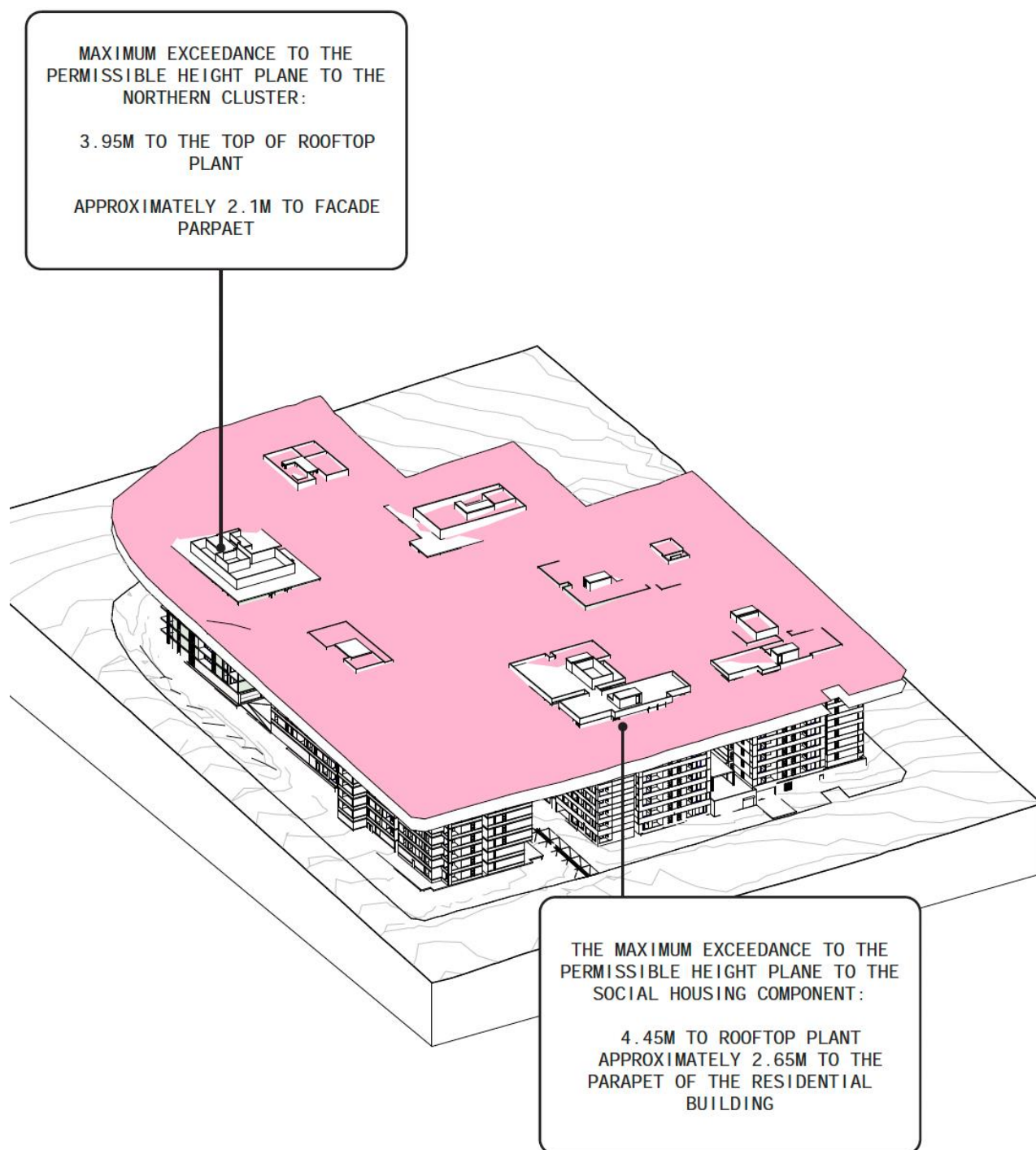


Figure 17 Height plane diagram (Source: BVN)

The height exceedance results from the sloping topography of the site and the requirement to raise the floor levels of the buildings to accommodate minimum flood planning levels ensuring safety for residents during flood events.

The proposed floorspace is well below the maximum allowable FSR and permitted GFA by more than 17,400sqm. The proposed floorspace is appropriately accommodated on the site through the proposed height variation which provides for extensive deep soil, communal open space areas and landscaping at ground level, rather than accommodating the proposed floorspace within a consistent 28.6m height limit across the site which would result in increased bulk, scale, and amenity impacts.

The proposed development has lower bulk and scale than is permissible and provides extensive landscaping and communal open space, including 37% of the site as communal open space and 30% deep soil. The proposed development also provides appropriate height transition to surrounding buildings, with significant landscaped setbacks, and stepped massing to the south to provide an appropriate transition and provide a high level of amenity.

In most cases, the height exceedance is minor and generally limited to lift overruns and rooftop plant. The greatest extent of the height exceedance is for the Social Building which is the result of the slope of the site to the south and need to raise the residential levels by approximately 3.5m above the ground level to achieve the minimum flood planning level at the Pembroke Street frontage.

The proposed development is considered appropriate for the site's context and is considered to align with the future character of the local area which has been identified to transition to a higher density residential area over time.

Despite the non-compliance, the proposed development does not result in any unreasonable amenity impacts to adjoining properties or public domain. The solar analysis in the Design Report at Appendix E demonstrates that the proposed development will not result in any adverse overshadowing impacts to neighbouring residential buildings when compared to a compliant height.

6.1.2 Floor Space Ratio

The maximum permissible FSR that applies to the site under the applicable Housing SEPP provisions is 2.86:1 allowing up to 62,325sqm of floor space.

The proposed development has a FSR of 2.05:1 and proposed GFA of 44,848sqm which is significantly less than the permitted FSR for the site.

6.1.3 Building Setback and Separation

Setbacks

Building setbacks have been designed to maximise tree retention and allow for generous landscaping along street frontages.

To retain the existing landscape character of the site, which comprises substantial mature street trees along the street frontages, the setbacks have been determined based on arborist advice to enable high value street trees to be retained and protected. These trees will maintain the pedestrian amenity surrounding the site, screen the proposed development and allow for generous landscaped setbacks and deep soil along all street frontages.

The proposal generally complies or exceeds with the recommended street setback of 7.5m in the Sutherland DCP as shown in Figure 18.

The proposed development provides a predominant 7.5m setback to the Princes Highway frontage; however, due to the curved boundary at the northern most point of the site, a minor reduction to 5.1m is required for small portion of Building 1B to ensure a consistent building alignment. Most of the northern setback is 7.5m.

To the western, northwestern and southern boundaries, building setbacks exceed the 7.5m setback recommended in the Sutherland DCP to retain the existing established trees.

The setback along Pembroke Street ranges from 9.5m to 11.9m, and the setback to Florida Street ranges from 7.5m to 11.7m providing for retention of significant trees, deep soil landscaping and sensitive built form transitions to surrounding lower density residential areas.

The proposed setback to Port Hacking Road ranges from 8.4m to 15m which allows for retention of significant trees within the front setback.

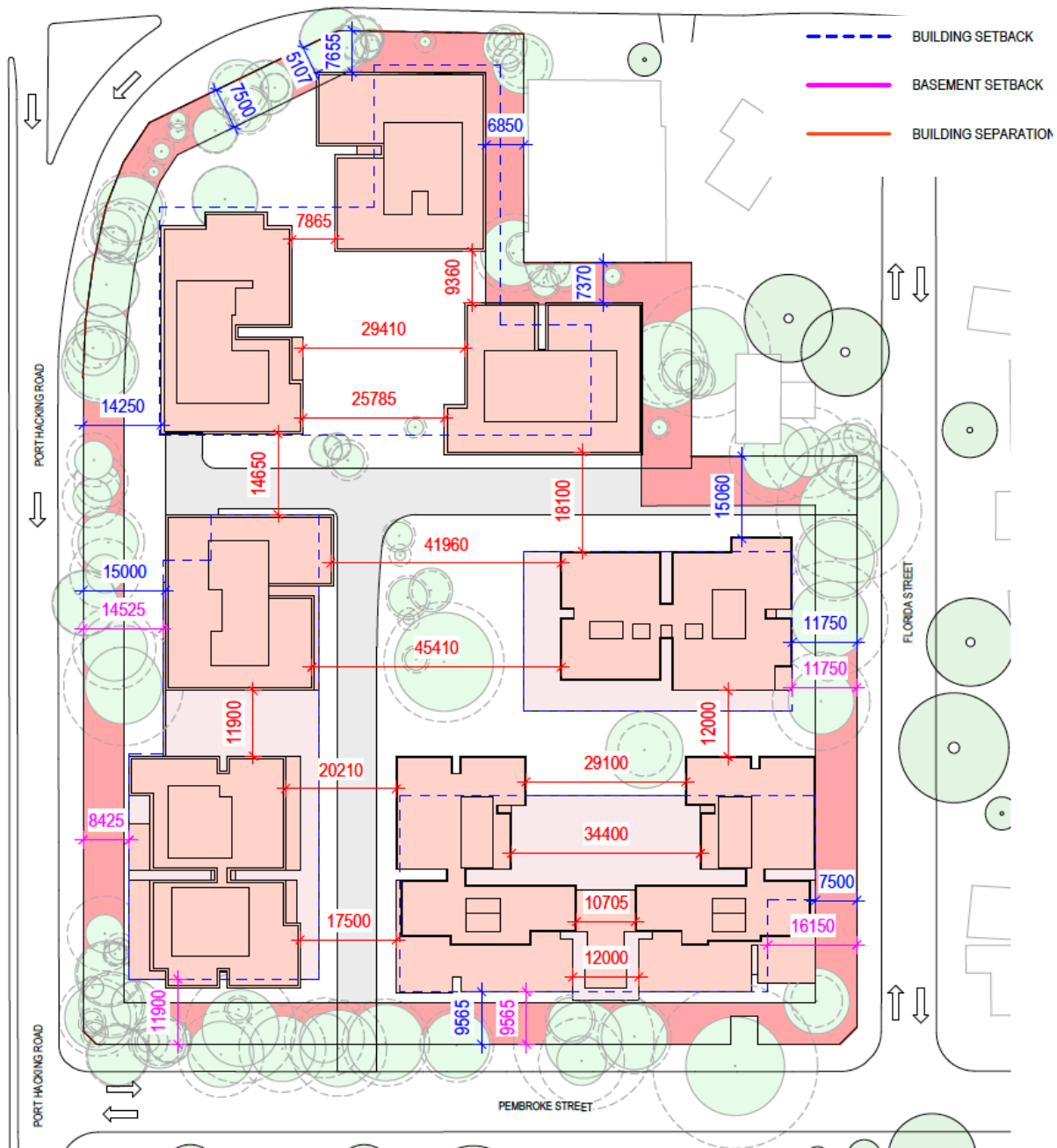


Figure 18 Proposed setbacks and building separation (Source: BVN)

Building separation

Building separation for proposed buildings within the site has been guided by the recommended building separation design criteria in the Apartment Design Guide.

The proposed development achieves the minimum ADG separation distances for all proposed buildings up to four storeys (as shown in Figure 18).

Above four-storeys the proposed buildings have been designed to ensure a high level of privacy through the offsetting of windows from habitable spaces of adjacent facades and well considered integration of angled privacy screening into the building envelope.

This ensures a high level of visual privacy and amenity for future residents and achieves the privacy objectives of the ADG.

Due to the generous front setbacks, the proposed development exceeds the minimum separation distances in the ADG for adjacent land, particularly to the south and east of the site, ensuring there is no impact on the ability of surrounding sites to redevelop in the future.

6.2 Design Quality

The proposal has been designed in accordance with the design quality principles of the Apartment Design Guide as detailed in the Design Verification Statement which forms part of the Architectural Design Report at Appendix E.

In addition to the above, the proposal has been subject to two design reviews by the SDRP held on 5 September 2025 and 3 October 2025 with representatives from the project design team and Homes NSW.

A summary of the SDRP feedback and how the design has responded is provided in the Design Report at Appendix E.

6.3 Residential Amenity

The proposed development has been designed to achieve a high level of amenity for residents and generally complies with the objectives and recommended design criteria in the Apartment Design Guide (ADG).

A detailed assessment of compliance with the ADG is provided in the Design Report at Appendix E. A summary of the proposed development's consistency with the key ADG criteria is provided below and discussed in Section 6.1.3 and 6.5.2.

6.3.1 Solar

All proposed buildings generally comply or exceed the solar access requirements in the ADG. The proposed development has been designed to optimise solar access to all apartments and deliver a high level of amenity.

An overview of the proposed solar access to each building is provided in Table 16 and is detailed in the Design Report at Appendix E.

Table 16 Proposed solar access

Development	Building reference	Solar access	Compliance
Building 1 - North	Building 1A	- 77% of apartments receive 2 hours of sunlight in mid-winter	Yes
	Building 1B		

	Building 1C	- 5% of apartments receive no sunlight in mid-winter	
Building 2- South	Building B	- 75% of apartments receive 2 hours of sunlight in mid-winter - 13% of apartments receive no sunlight in mid-winter	Yes
Building 3 – West	Building 3A	- 73% of apartments receive 2 hours of sunlight in mid-winter	Yes
	Building 3B	- No apartments receive no sunlight in mid-winter	
Social Building	Social A	- 69% of apartments receive 2 hours of sunlight in mid-winter	Generally complies. Solar access has been optimised and achieves the design criteria in the ADG.
	Social B	- 11% of apartments receive no sunlight in mid-winter	

6.3.2 Cross ventilation

All proposed buildings comply with the cross-ventilation requirements in the ADG as outlined in Table 17 and detailed in the Design Report at Appendix E.

Table 17 Proposed cross ventilation

Development	Building reference	Cross ventilation	Compliance
Building 1 - North	Building 1A	60% of apartments are naturally cross ventilated.	Yes
	Building 1B		
	Building 1C		
Building 2- South	Building B	85% of apartments are naturally cross ventilated.	Yes
Building 3 – West	Building 3A	68% of apartments are naturally cross ventilated.	Yes
	Building 3B		
Social Building	Social A	68% of apartments are naturally cross ventilated.	Yes
	Social B		

6.4 Environmental Amenity

6.4.1 Overshadowing

The Design Report prepared by BVN Architects at Appendix E has considered potential overshadowing impacts to neighbouring residential development.

Building heights, particularly to the eastern and southern boundaries have carefully considered to ensure any overshadowing to neighbouring residential developments on Pembroke and Florida Street is minimised.

The proposed development has been designed to minimise overshadowing to the neighbouring buildings, particularly to the south of Pembroke Street. The proposal provides large, landscaped setbacks and includes upper-level setbacks and massing for a portion of the proposed building along the southern boundary to minimise overshadowing from the proposed development.

The overshadowing analysis in the Design Report considers the overshadowing from the proposed development and confirms that the proposed development will result in minimal impacts to adjacent properties.

As confirmed in the Design Report and Figure 19 the extent of any additional overshadowing of the proposed development when compared to a height compliant development is minor.



Figure 19 Proposed shadow diagrams (Source: BNV)

Further, Figure 20 and Figure 21 confirm that any potential solar impacts are limited only to the lower portions of the buildings where there are no windows. The lower parts of the residential buildings are also screened with fencing and landscaping further reducing any potential for overshadowing impacts from the proposed development. Further, the residential buildings to the south of Pembroke Street are orientated east-west for solar access minimising any potential for solar impacts.

The *In-fill Affordable Housing Planning Circular (PS 23-003)*, issued by the Department of Planning, Housing and Infrastructure, dated 14 December 2023, states that development outcomes should be balanced against Government's policy intent to realise more affordable housing in accordance with the National Housing Accord. For example, when considering solar access controls, the objective of preserving solar access should be considered whilst facilitating the delivery of affordable housing, which is a key objective under the Housing SEPP.

On balance, the minor additional overshadowing to properties south of Pembroke Street is negligible and the significant public benefit of providing 159 new social housing apartments outweighs this minor impact.

The overshadowing analysis demonstrates the proposed development would maintain a minimum of 2-hours of solar access to the neighbouring dwellings to the east of the site during mid-winter.

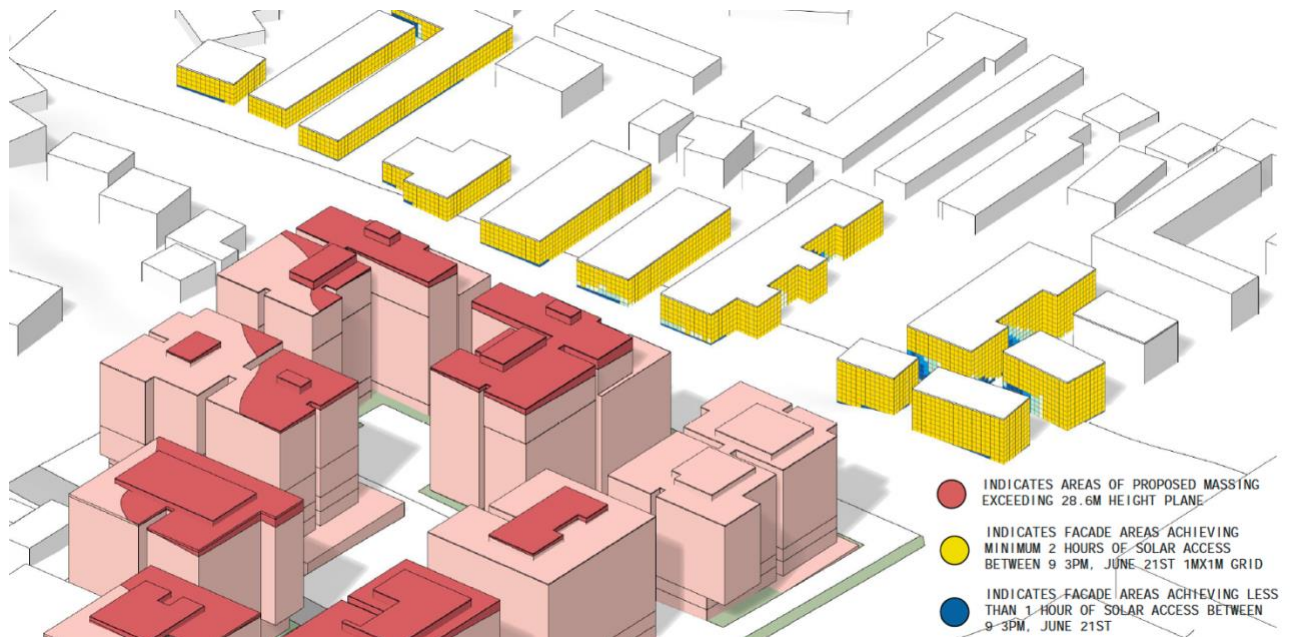


Figure 20 Proposed solar access to surrounding development (Source: BVN)

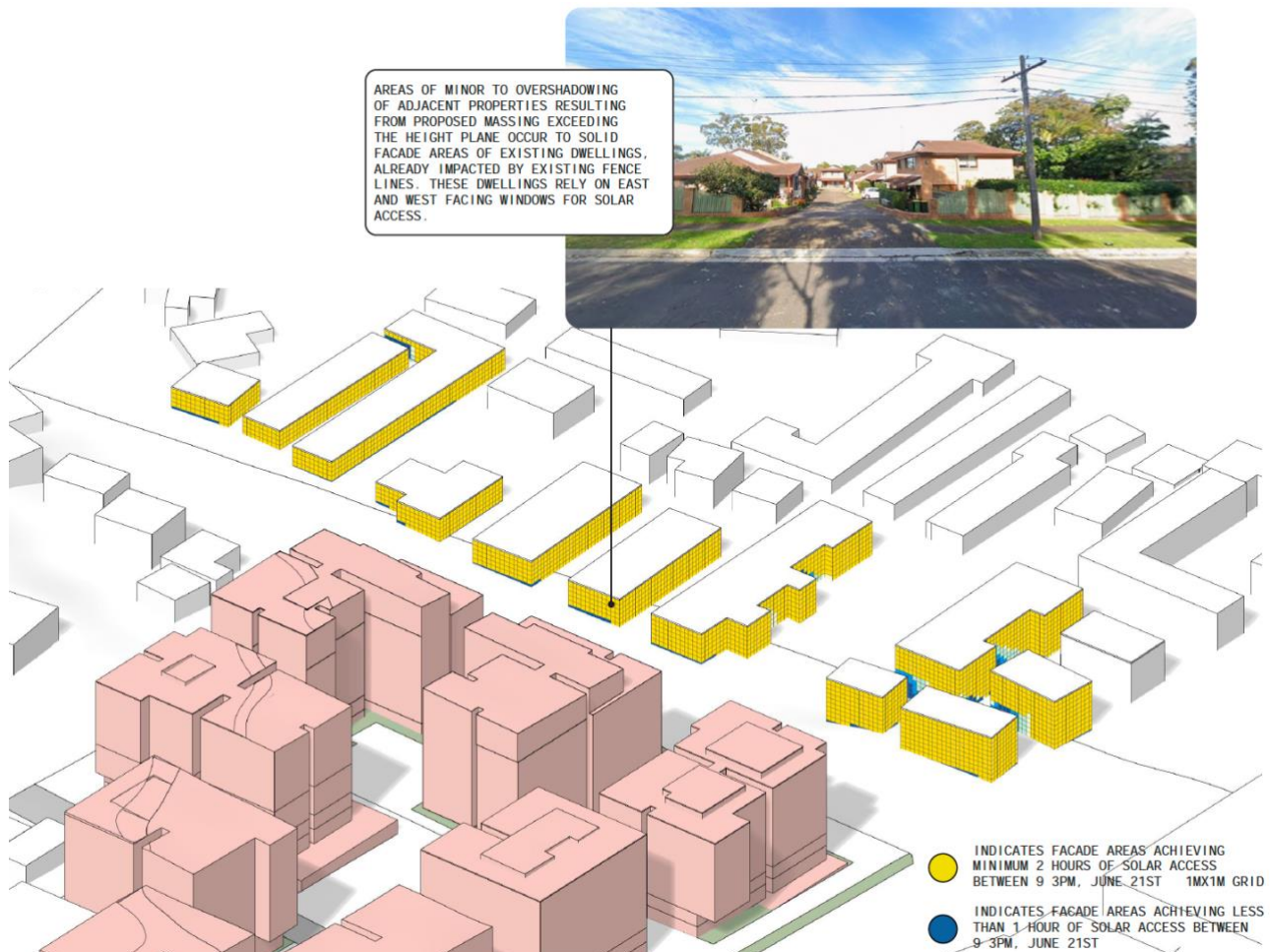


Figure 21 Compliant solar access to surrounding development (Source: BVN)

6.4.2 Visual Impact

A visual analysis forms part of the Design Report at Appendix E which shows the visual impact of the proposed development from key viewpoints within the public domain (see Figure 22 to Figure 25).

The analysis does not highlight any unreasonable impacts and mitigates visual impacts through:

- The proposed development is within an area planned for renewal and redevelopment, and the proposed development aligns with the intended future character for higher density residential development close to Southgate Shopping Centre.
- Providing generous setbacks to accommodate tree retention and landscaped street setbacks to soften visual impacts from surrounding areas.
- A stepped building form for the social building with the height stepping down to seven storeys at southern boundary provides a transition to surrounding residential proposes on Pembroke Street.
- The proposed buildings along Florida Street are setback a minimum 7.5m to 11.7m, with generous landscaped communal open and shared access road reducing visual impacts of proposed buildings along this interface.
- Given the width of Port Hacking Road and Princes Highway, and the retention of trees and extensive landscaping along these frontages, the proposal is not expected to result in any significant visual impacts when viewed from the north of west.
- The proposal has been designed to minimise visual impacts through generous front setbacks, retention of high value trees and landscaping along all site frontages.
- The proposal retains significant trees along the site boundaries, provides enhanced landscaping and provides for 31.5% tree canopy cover, mitigating visual impacts.



Figure 22 Proposed view looking west on Princes Highway

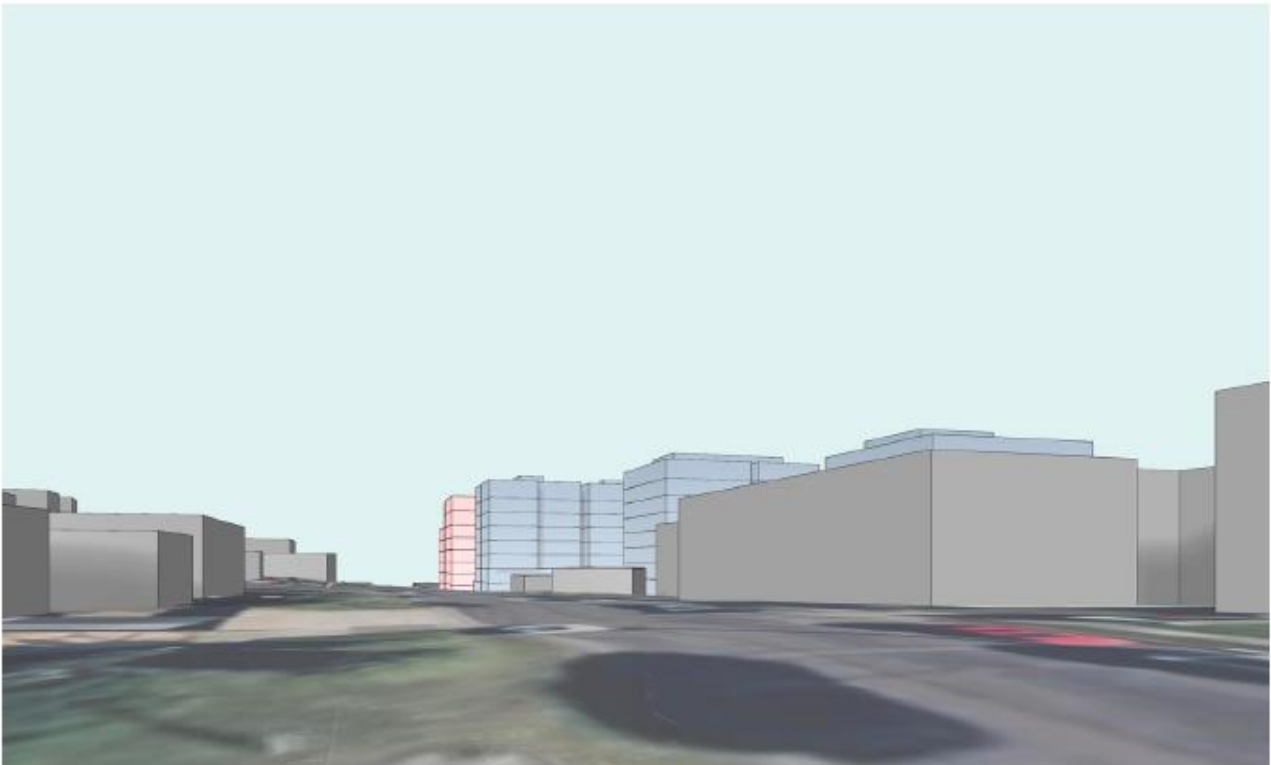


Figure 23 Proposed view looking south from Florida Street (Source BVN)



Figure 24 Proposed view looking north on Port Hacking Road (Source: BVN)

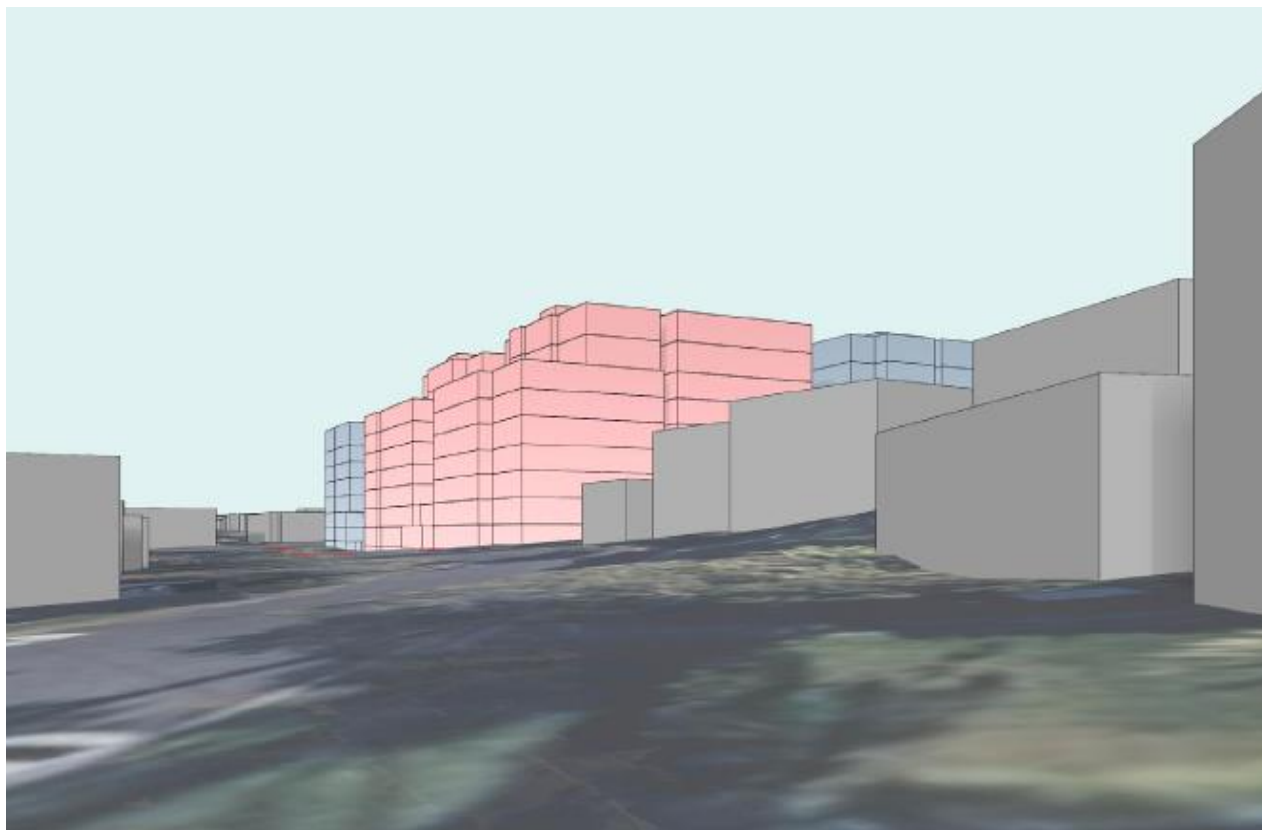


Figure 25 Proposed view looking west on Pembroke Street

6.5 Tree Canopy, Communal Open Space and Landscaping

6.5.1 Trees

The proposed development has been designed with the intention of retaining and protecting significant trees where possible including through careful placement of buildings and communal opens space, and increased setbacks on all street frontages.

An Arboricultural Impact Assessment has been prepared by Bird Trees Consultancy (Appendix I) which has assessed 220 existing trees within and adjacent to the site and considered the impacts associated with the proposed development.

A total of 24 high value trees were assessed (11% of all trees), with the majority of trees being moderate value trees (54%) or low value trees (35%).

Of the 220 trees assessed, 93 trees are proposed to be retained and protected and 127 are required to be removed to accommodate the proposed development as detailed in Table 18.

The majority of high value trees are proposed to be retained (58% retained).

Table 18 Tree retention value, removal and retention

	Retained	Removed	Total
Low retention value	35	43	78
Medium Retention value	44	74	118
High retention value	14	10	24
Total	93	127	220

The Arboricultural Impact Assessment confirms that 53 of the assessed trees are exempt species and not subject to the tree preservation provisions in the Sutherland DCP. Approval for the removal of these trees is not required.

Of these exempt trees assessed, 24 are to be removed as part of the proposal (Trees 15, 101, 102, 107, 108, 110, 111, 112, 115, 141, 157, 166, 167, 168, 170, 171, 172, 173, 174, 175, 183, 195, 198, 200).

A further six trees for removal (Trees 20, 50, 78, 186, 207, and 214) are dead trees with no apparent fauna habitat and therefore also exempt.

Therefore, the proposed development requires approval for the removal of 97 trees as part of this SSDA.

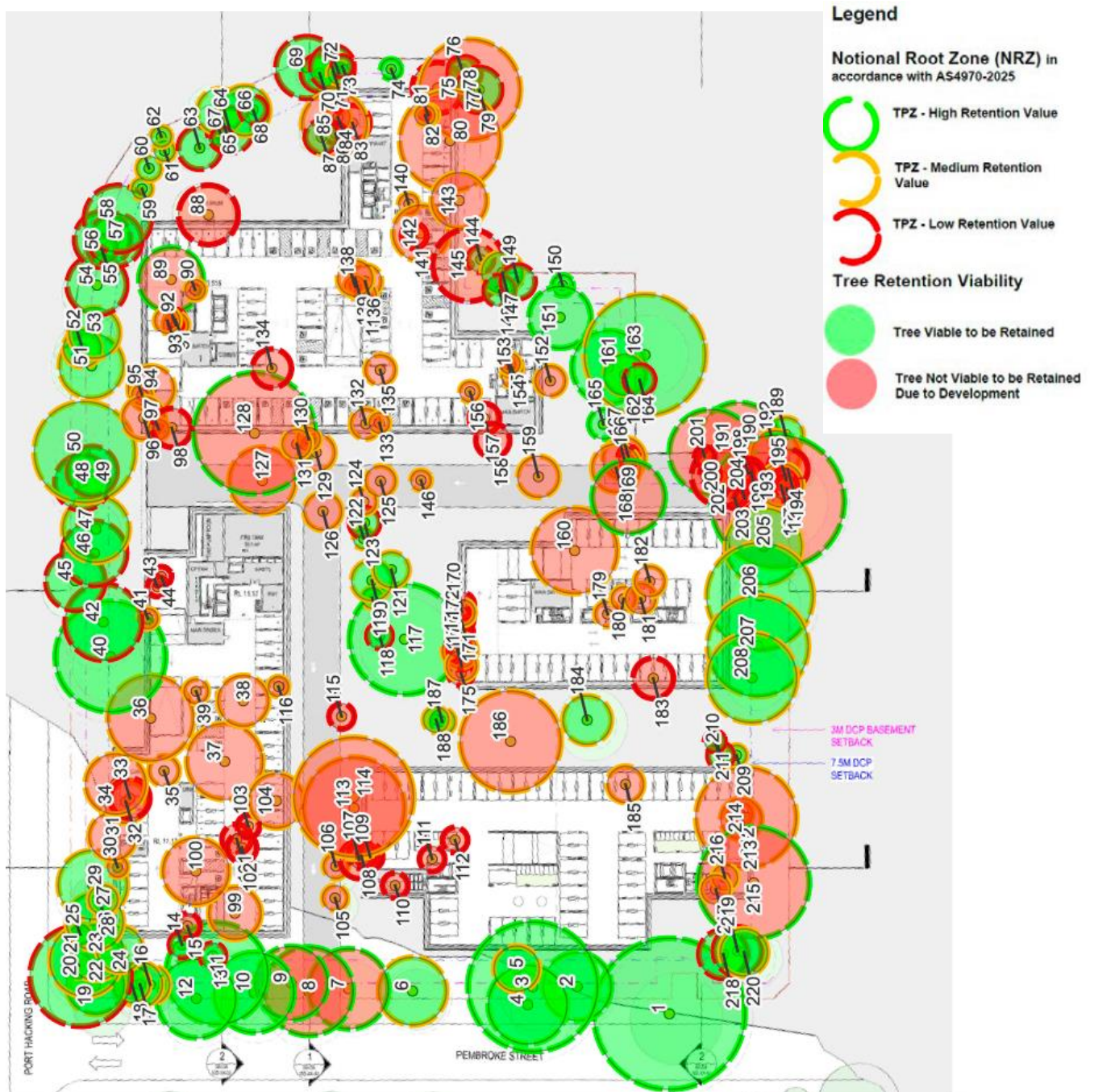


Figure 26 Proposed tree retention plan (Source: Birds Tree Consultancy)

The Arboricultural Impact Assessment identifies that six trees proposed for retention (Trees 10, 46, 48, 49, 151 and 163) have evidence of decay within the trunk which places these trees at increased risk of failure. The Arboricultural Impact Assessment recommends that an ISA (TRAQ) Level 3 Risk Assessment be conducted including internal diagnostic testing to determine the viability of these trees to be retained. This recommendation has been reflected in the Mitigation Measures at Appendix C.

The Arboricultural Impact Assessment also sets out tree protection measures to be implemented prior to and during construction of the proposed development to ensure that trees to be retained are protected from impacts during construction.

The implementation of these tree protection measures prior to commencement of works and during demolition and construction is included in the Mitigation Measures at Appendix C.

6.5.2 Landscaping and communal open space

The proposal maximises landscaping, communal open space and tree canopy cover across the site to meet and exceed relevant benchmarks as detailed below.

- **Canopy cover:** 31.5% of the total site area which substantially exceeds the target of 20% tree canopy in the *Tree Canopy Guide for Low and Mid Rise Housing* (refer to Figure 27).
- **Deep soil:** 6,611sqm which is 30% of the total site area and exceeds the target of 15% in the ADG and the *Tree Canopy Guide for Low and Mid Rise Housing* (refer to Figure 28)
- **Landscaped area:** 11,478sqm which is 53% of the total site area and significantly exceeds the non-discretionary development standard of 30% landscaped area in the Housing SEPP.
- **Communal open space:** a total of 8,022sqm of communal open space is provided across the total site (37%). Of this, 1,237sqm is provided in Stage 1/ Social Housing lot (which is 25% of the Stage 1 site area) and 6,784sqm is provided in Stage 2 / Market Housing lot (which is 45% of the Stage 2 site area).
- **Solar access to communal open space:** More than 50% of the communal open space receives solar access between 9am and 11am in accordance with the ADG.

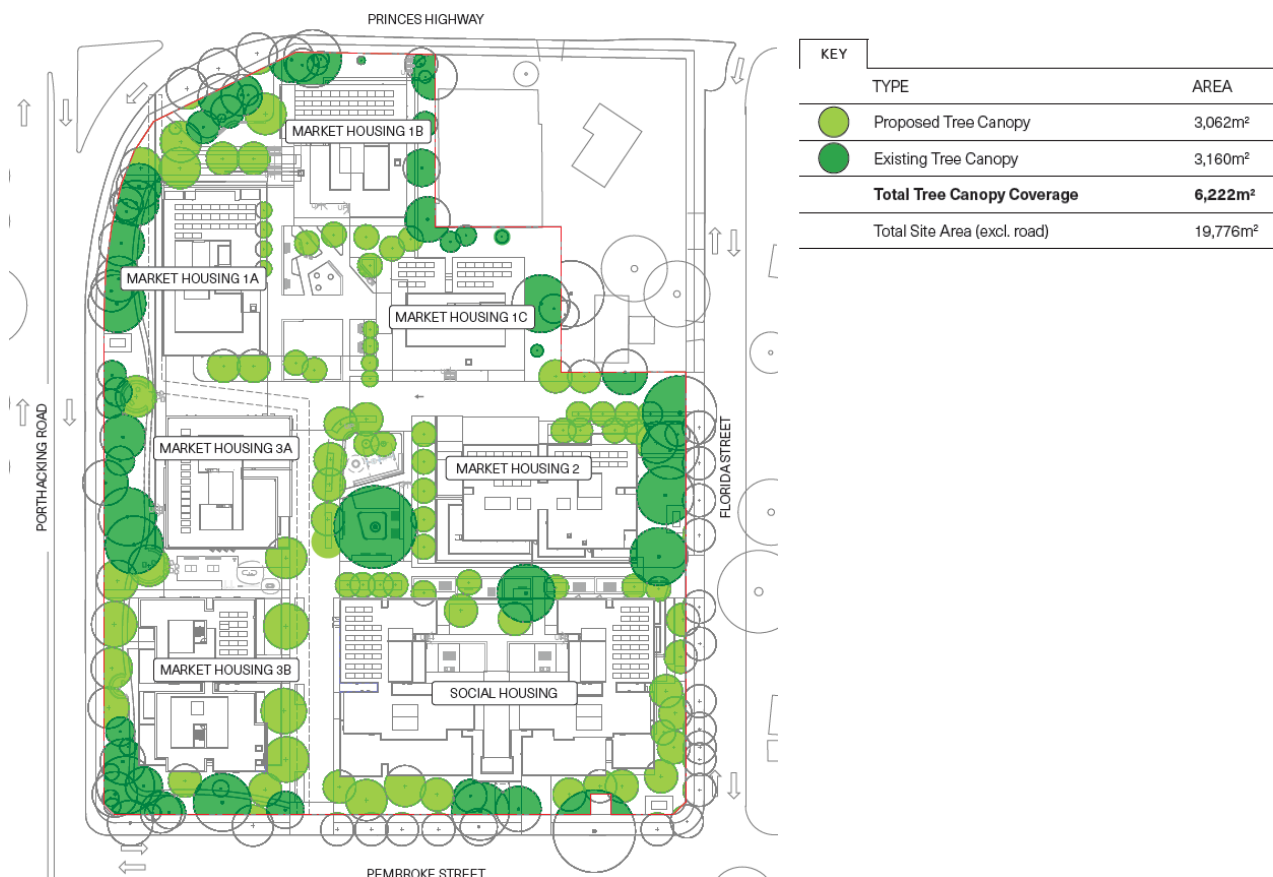


Figure 27 Proposed tree canopy (Source: Turf)

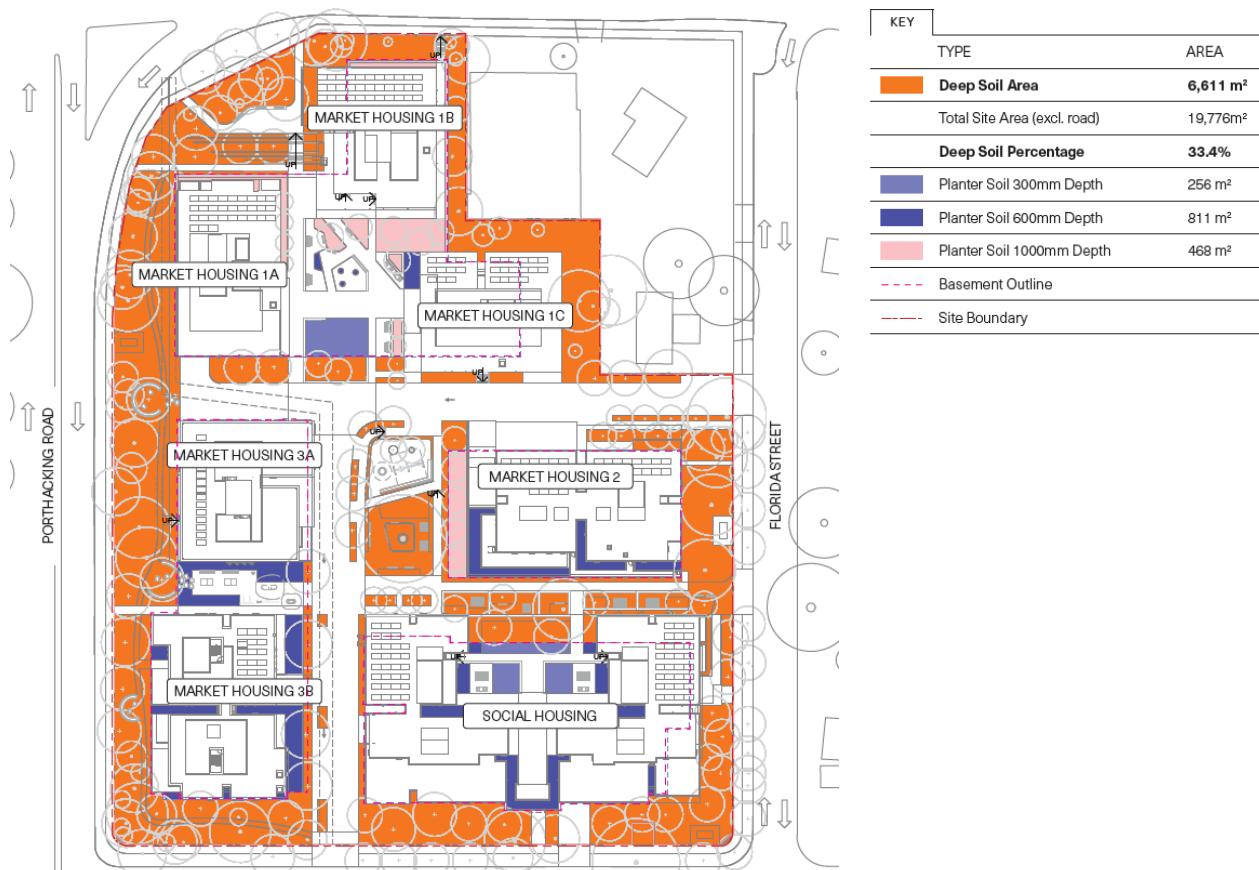


Figure 28 Proposed deep soil (Source: Turf)

6.6 Ecologically Sustainable Development

An Ecological Sustainable Development (ESD) Report and BASIX Certificate has been prepared by E-LAB Consulting and is provided at Appendix M and Appendix N respectively.

The ESD Report considers the relevant legislative and policy documents and demonstrates how the proposal has incorporated ESD initiatives including energy efficiency and compliance.

The proposal achieves the following NSW BASIX scores consistent with the required targets:

- Water Savings – 40%
- Energy Savings –61%.

The ESD Report outlines how the proposed development incorporates principles of ESD in accordance with Section 193 of the EP&A Regulation 2021.

6.7 Traffic, Transport and Accessibility

6.7.1 Access

Vehicle access to the site is currently provided via multiple driveways on both Florida Street and Pembroke Street as indicated in Figure 3. An internal roadway known as Coral Tree Place is also provided and is accessed via Florida Street.

By providing vehicular access from Florida Street and Pembroke Street (being local roads) the proposal complies with this provision of the SEPP. No direct vehicle access is provided from the classified roads of Princes Highway or Port Hacking Road.

The vehicle access points have been designed in accordance with the design requirements set out in the relevant Australian Standard, namely AS2890.1:2004

Vehicle swept paths indicating the entry and exit of passenger vehicles from the site are provided in the following figures – demonstrating suitable allowance for simultaneous movement of vehicles entering and exiting the site.

Pedestrian access

There are currently no existing footpaths on the Port Hacking Road, Pembroke Street or Florida Street frontages to the site.

There is an established network of pedestrian and cycling facilities in the broader vicinity of the site and the proposed development will significantly improve pedestrian access in and around the site with new pedestrian paths on all street frontages.

The provision of new pedestrian footpaths along the site's frontages will provide safe and direct pedestrian access to the existing signalised pedestrian crossing of Port Hacking Road, this provides direct access to the adjacent major retail centre and is located at Melrose Avenue approximately 150m to the south of the site.

Due to the major arterial roads fronting the site such as the Princes Highway and Port Hacking Road there is limited potential to provide additional pedestrian crossings on these roads; however, the proposal provides significant improvements to the pedestrian infrastructure surrounding the site to ensure residents can easily and safely access the existing signalised crossings of the Port Hacking Road and Princes Highway.

The proposal will significantly enhance pedestrian accessibility in the vicinity of the site through the introduction of pedestrian footpaths on all site frontages, new internal pathways and a 10km/h low speed shared zone which will deliver improved pedestrian access.

6.7.2 Parking

The proposal provides a total of 733 car parking spaces, comprising 92 spaces for the social dwellings and 641 resident and visitor spaces for the market dwellings.

The proposed development complies with the minimum parking rates in the Housing SEPP. The parking rates in the Sutherland DCP have been applied to the market dwellings.

The Housing SEPP does not specify minimum parking requirements for visitor parking, or bicycle and motorcycle parking; however, visitor parking for the market dwellings has been provided in accordance with the rates in the Sutherland DCP.

The proposed development meets the minimum parking requirements in the Housing SEPP and Sutherland DCP as shown in

Table 19. The proposed level of parking is considered satisfactory to accommodate expected parking demand.

Table 19 Proposed car parking (Source: JMT Consulting)

Land Use	Type		No. of units	Minimum Parking Rate	Min. No. of Spaces*	Parking provided
Residents	Non-Affordable Housing	1 bed	52	1.0 / unit	52	733
		2 bed	218	1.5 / unit	327	
		3/4 bed	55	2.0 / unit	110	
	Affordable Housing	1 bed	77	0.4 / unit	31	
		2 bed	60	0.5 / unit	30	
		3/4 bed	22	1.0 / unit	22	
	Sub-Total: Residents					
Residential Visitors			1 / 4 units	121		
Total			484	-	693	

Bicycle parking

Based on the bicycle parking rates in the Sutherland DCP, the proposed development would be required to provide a minimum of 40 bicycle parking spaces across the site.

The proposal provides a total of 90 bicycle parking spaces across the development which exceeds the minimum rates in the Sutherland DCP.

All bicycle parking spaces will comply with the requirements of the Australian Standard AS2890.3.

6.7.3 Traffic generation

The proposed development is forecast to generate 78 trips in the AM peak and 61 trips in PM peak.

Intersection modelling undertaken as part of the Transport Impact Assessment confirms that the proposal will not adversely impact the operation of the adjacent road network – with all intersections forecast to retain their current level of service (refer to Table 20 and Table 21).

An assessment of the future scenario including the proposed development, confirms the proposed development will not result in any impact to current intersection performance and there is no change to the intersection performance of nearby intersections.

The Transport Impact Assessment confirms that the proposed development will not generate the need for any intersection works or road upgrades, and the proposed development will not result in any significant impacts to the surrounding road network.

Table 20 Existing and proposed intersection performance – AM Peak (Source: JMT Consulting)

Intersection	Intersection Performance – Existing Conditions			Intersection Performance – Existing Conditions + Proposal		
	Level of Service	Degree of Saturation	Average Delay (s)	Level of Service	Degree of Saturation	Average Delay (s)
Princes Highway / Port Hacking Road	D	0.97	54	D	0.97	56
Princes Highway / Florida Street	A	0.44	6	A	0.44	6
Port Hacking Road / Pembroke Street	A	0.38	12	A	0.38	13

Table 21 Existing and proposed intersection performance – PM Peak (Source: JMT Consulting)

Intersection	Intersection Performance – Existing Conditions			Intersection Performance – Existing Conditions + Proposal		
	Level of Service	Degree of Saturation	Average Delay (s)	Level of Service	Degree of Saturation	Average Delay (s)
Princes Highway / Port Hacking Road	D	0.92	48	D	0.92	48
Princes Highway / Florida Street	A	0.66	6	A	0.66	6
Port Hacking Road / Pembroke Street	A	0.33	12	A	0.33	12

6.7.4 Loading and Servicing

The loading strategy for the proposal involves the creation of on street loading zones immediately fronting the proposed market buildings within the site.

The proposed on-street loading zones can accommodate a range of service vehicles and delivery vehicles, and Sutherland Shire Council's 10.5m waste collection vehicles.

Waste vehicles serving the social housing development fronting Pembroke Street will be provided along Pembroke Street. A collect and return strategy is proposed, whereby Council waste collection teams will be able to collect waste bins from the waste holding room within the building footprint, unload waste into the vehicle and then return empty bins to the holding area.

For the remaining buildings waste collection and building servicing occurs from the internal shared zone with dedicated on-street loading zones. Service vehicles will not enter the buildings themselves.

Vehicle swept paths have been developed to confirm the suitability of the design to accommodate the movement of a Council waste collection vehicle into and out of the on-street loading zones. Separately swept paths have been developed for a delivery vehicle manoeuvring within the site confirming it has the ability to travel around potential on-street parking and loading bays.

6.7.5 Construction Traffic Management

A Preliminary Construction Traffic Management Plan (CTMP) forms part of the Traffic Impact Assessment to outline the key principles for how construction may be carried out on the site, subject to further planning to be undertaken during subsequent stages of the project.

Prior to the commencement of construction for the site, a detailed CTMP will be prepared which will identify:

- Proposed construction vehicle routes
- Indicative construction programme
- Expected construction vehicle types and volumes
- Car parking arrangements and site access during construction
- Safety measures to minimise impacts to pedestrians and cyclists.

This is included in the Mitigation Measures at Appendix C.

6.8 Aboriginal Cultural Heritage

An Aboriginal Archaeological Due Diligence Report has been prepared by Curio Projects and is provided at Appendix O.

The Report confirms that the site is not likely to contain any Aboriginal objects.

The Report notes that the site is within 250m of the Georges River and 420m north of Gwawley Creek. While proximity to the Georges River suggests potential for past Aboriginal use of the general area, the Report finds that the environmental characteristics of the Gynea landscape, absence of sandstone shelter features, and extent of historical disturbance indicate that the likelihood of intact Aboriginal archaeological deposits surviving within the study area is low.

Based on the outcomes of the AHIMS search, environmental context, and disturbance history of the study area, no further Aboriginal archaeological investigation is warranted at this stage. The study area is assessed as having low Aboriginal archaeological potential, with little to no likelihood of intact subsurface deposits or surface expressions surviving within the current development footprint.

The proximity of the Georges River and Gwawley Creek indicates that the broader landscape would have been utilised by Aboriginal people; however, the absence of sandstone outcrops or

shelter formations, the shallow and acidic soils of the GyMEA landscape, and historical disturbance of the study area have greatly diminished the potential for archaeological material to survive in situ.

Based on the findings of the Aboriginal Archaeological Due Diligence Report, no further Aboriginal heritage assessment or investigation is required, and preparation of an Aboriginal Cultural Heritage Assessment Report is not required for the proposed development.

6.9 Environmental Heritage

6.9.1 Built Heritage

A Baseline Archaeological Assessment has been prepared by Curio Projects and is provided at Appendix P.

The assessment confirms that there are no listed heritage items within or immediately surrounding the site. There is one listed heritage item located approximately 300m of the site; however, this item has no direct relationship to the site given its location to the north across the Princes Highway and is obscured from view by existing development (refer to Figure 29).

Given there are no heritage items within the immediate vicinity of the site, the proposed development will not result in any heritage impacts.



Figure 29 Heritage items in the vicinity of the site (Source: Curio Projects)

6.9.2 Archaeological Heritage

A Baseline Archaeological Assessment has been prepared by Curio Projects and is provided at Appendix P.

The assessment confirms that the site has been cleared multiple times, initially for agriculture and later for residential development, leaving little opportunity for intact yard surfaces or surface occupation evidence to survive. Subsurface deposits have likely been heavily impacted by the construction and demolition of mid-20th-century buildings, associated service trenches, and subsequent redevelopment. There is no evidence of early colonial or nineteenth-century structures, features, or significant historic occupation on the site.

Overall, the study area is assessed as containing nil to low archaeological potential.

The assessment notes that should isolated features or artefacts be encountered, there would also likely be highly disturbed, poorly contextualised, and unlikely to contribute new research information.

The assessment determines that the proposed development can proceed with caution without further archaeological assessment, subject to the implementation of an Unexpected Finds Protocol. Should suspected relics be identified over the course of the works, works should cease immediately, and Heritage NSW will be notified, in accordance with the Unexpected Finds Procedure.

6.10 Biodiversity

A BDAR Waiver Request prepared by EcoLogical at Appendix R has determined that the proposed development is not likely to have any significant impact on biodiversity values.

A review of historical imagery of the study area shows that the study has undergone significant development on which has resulted in the removal of the majority of vegetation within the study area. However, some native vegetation occurs within the eastern and southern parts of the study area.

The majority of vegetation validated as a Planted Community Type (PCT) 3594 – Sydney Coastal Sandstone Foreshores Forest within the study area is proposed to be retained by the proposed works. Four trees validated as PCT 3594 are proposed to be impacted by the development, accounting for approximately 0.029 ha. Approximately 0.047ha of PCT 3594 will be retained within the study area, located along the southern and western boundaries.

Remaining impacts will affect planted native and exotic vegetation, which does not correspond to a PCT. The BDAR Waier Request indicates the remaining vegetation present within the study area appears to all have been planted sometime prior to 2005 based on historical imagery.

The BDAR Waiver Request concluded that the study area does not significantly contribute to habitat connectivity across the local landscape and is mainly surrounded by roads, built structures including multi-storey buildings, and is not connected to areas of intact native vegetation. As such, the study area provides limited connectivity to facilitate the movement of threatened species across their range. It also confirmed that vegetation within the study area does not contain habitat that is critical to maintaining the life cycle of threatened species, excluding grey-headed flying-fox, and field surveys indicated no signs of microbats on site.

Notwithstanding, the following mitigation measures are recommended:

- Pre-clearance surveys of vegetation to determine whether any fauna habitat is present. If fauna habitat is identified, trees should be clearly marked, and all other vegetation should be cleared prior. An ecologist or similarly qualified personnel should be present during clearance works of vegetation containing identified fauna habitat.

- Incorporate locally indigenous flowering species into the landscaping and garden designs to support local biodiversity.
- Erosion and sediment controls be implemented during the construction phase to prevent runoff affecting any water bodies within the nearby area

Following the implementation of the above mitigation measures, the remaining impacts to biodiversity are considered to be minimal and appropriate for approval.

A Biodiversity Development Assessment Report (BDAR) Waiver has been granted by the Department of Planning, Housing and Infrastructure (DPHI) and the Department of Climate Change, Energy, the Environment and Water (DCCEEW), issued on the 8 December 2025 and is provided at Appendix S.

6.11 Contamination

A Detailed Site Investigation (Appendix V) has been prepared by JBS&G to support the EIS which identified site conditions that will require remediation to make the site suitable for the proposed development.

A number of areas of potential contamination concern, including the identification of asbestos in soil contamination within surface and near surface fill material sporadically across the site in addition to nickel and petroleum hydrocarbon (TRH) at one location each in fill materials at the site exceeding the adopted ecological assessment criteria.

The assessment also identified potential for groundwater contamination with elevated concentrations of zinc and PFAS compounds. Based upon the available soil and groundwater characterisation data, the assessment indicated that the reported concentrations of zinc and PFAS compounds in groundwater are not considered significant and/or a widespread contamination source(s) on the site, or to pose an unacceptable risk to future site occupants/users in the absence of complete exposure pathways between residents and groundwater.

However, it is noted that these concentrations may require further consideration/management should temporary dewatering be necessary during redevelopment construction activities. The assessment recommends further consideration should be given to potential requirements for treatment of groundwater in addition to standard construction requirements (sediment flocculation, pH adjustment, etc) should temporary dewatering during construction activities and associated off-site disposal of water be required given the occurrence of zinc and PFAS compounds in groundwater at the site above the most sensitive relevant site ecological criteria.

Preparation of a Remediation Action Plan was recommended along with additional assessment of groundwater zinc and PFAS compound concentrations to appropriately characterise conditions with consideration to potential requirements for dewatering and treatment of groundwater for PFAS and zinc should this be required during redevelopment works.

To address the recommendations of the Detailed Site Investigation a Remediation Action Plan (RAP) has been prepared by JBS&G and is provided at Appendix W. The RAP identified outstanding data gaps with regard to characterisation of the nature/extent of site contamination conditions, including:

- The extent of nickel impact in fill material associated with BH12 in the northern portion of the site.
- The extent of TRH impact in fill material associated with BH21 in the northern portion of the site
- The extent of asbestos impacts in fill material at identified locations.

- The extent of asbestos impacts in soil across the site.
- Fill characterisation beneath existing building footprints and areas of hardstand and associated surface soil conditions as may be identified following building demolition.

The RAP sets out that the identified data gaps are to be addressed via further delineation and assessment once access is available to the relevant site portions, with the results to be evaluated within the broader RAP framework.

The RAP concluded that subject to the successful implementation the measures described in this plan, the site can be made suitable for the intended use.

The RAP recommended that the processes outlined in the plan be implemented and that the following documentation be developed and implemented in addition to the RAP to ensure the risks and impacts during remediation works are controlled in an appropriate manner:

- An Asbestos Management Plan (AMP) to ensure the risks and impacts associated with asbestos removal and validation works are controlled appropriately.
- A Remediation Environmental Management Plan (REMP), to document the monitoring and management measures required to control the environmental impacts of the works and ensure the validation protocols are being addressed; and
- A Work Health and Safety Management Plan (WHSP) to document the procedures to be followed to manage the risks posed to the health of the remediation workforce.

6.12 Acid Sulfate soils

The site is mapped as Class 5 Acid Sulfate Soils (ASS) under the Sutherland LEP.

The Preliminary Site Assessment / Detailed Site Assessment (Appendix V) highlights that:

Areas of high probability of ASS occurrence have been identified approximately 350 – 400 m downgradient of the site as associated with bottom sediments within Gwawley Creek and surrounding areas of ‘disturbed terrain’. Such areas may include reclaimed land formed with the use of dredged material and/or with alluvial sediments underlying filled material. With consideration to ground characteristics within the site and the proposed development, it is considered that future construction activities, including excavation and potential dewatering, will not result in significant alteration of groundwater levels beyond the site boundary, and as such, will not result in disturbance of the known downgradient ASS conditions. As such, no further consideration of requirements for the management of acid sulfate soil is required.

Accordingly, an Acid Sulfate Soils Management Plan is not considered to be required.

6.13 Ground and Groundwater

A Geotechnical Investigation Report has been prepared by JBS&G (Appendix U) to support the EIS which has been based on borehole testing. The report highlighted that:

- The site is underlain by sandy soils with soils classified as ‘non-saline’
- Groundwater was measured to be between 3.5m and 7.2m below the ground surface level.
- The depth of bedrock is assessed to generally exceed 3.8m, with the depth of bedrock expected to being highly variable across the site.

The report concluded that no geotechnical conditions were identified which were unusual for typical residential and the site is suitable for this type of development subject to appropriate design considerations.

The Geotechnical Investigation recommends that due to the uncertainty of bedrock depth, further geotechnical investigation is to be undertaken to determine the depth of bedrock and assess its characteristics across the site. The additional geotechnical investigations should target the southern extent of the site.

The Geotechnical Investigation identifies out that the proposed development includes the construction of four basements, up to four levels with the lowest level at approximately RL 2.1m. Therefore, the groundwater is expected to be intercepted as groundwater levels are approximately 3.5m to 7.2m below ground (RL 11m to 14.6m). The Geotechnical Assessment outlines that groundwater must be managed during the proposed works and recommends fully tanked basements in perpetuity for the proposed development.

The Geotechnical Investigation recommends a Groundwater Impact Report be prepared to inform:

- The required depth of the shoring system and likely inflows and drawdown during the construction stage
- The design groundwater levels during construction in perpetuity
- Dewatering methodologies
- Drawdown extents
- Settlements due to dewatering
- Disposal of extracted water
- Monitoring and licensing requirements.

The Geotechnical Investigation provides recommendations for the site preparation and construction stages to be implemented as part of the proposed development, including:

- Dilapidation surveys and monitoring
- Foundation and shoring design
- Slab and pavement design.

The Mitigation Measures at Appendix C includes requirements to ensure that all recommendations of the Geotechnical Assessment are implemented prior to the relevant construction certificate.

6.14 Water Management

An Integrated Water Management Plan (IWMP) has been prepared by Mott MacDonald and is provided at Appendix L. The IWMP and supporting civil plans show the design of the proposed stormwater infrastructure to support the development.

6.14.1 On-site stormwater detention

To manage stormwater flows on-site detention (OSD) proposed. Mott MacDonald has undertaken a DRAINS assessment to investigate the maximum water level within the tank and volume required under 1% AEP storm events.

Each building (Building 1, 2, 3 and the Social Building) will require separate OSD to ensure compliance with the applicable stormwater management controls. The location of the proposed OSD tanks is provided in Figure 30.

Each on-site detention (OSD) tank is equipped with an integrated overflow chamber designed to safely redirect excess water in the event of a blockage. This ensures that any potential overflow is managed effectively, preventing flooding within the building.

The implementation of the proposed OSD tanks will mitigate the peak flows from the site to retain existing conditions and stormwater discharge from the site will be appropriately managed and controlled as part of the proposed development.



Figure 30 Proposed OSD tanks

6.14.2 Water quality

The proposed development incorporates water quality treatment measures to manage water quality impacts. The proposal is consistent with the relevant Council stormwater quality targets as shown in Table 22 below.

The stormwater pollutant load reduction and water conservation objectives will be achieved by implementing stormwater quality treatment trains with storm filter cartridges, Ocean guard baskets and rainwater tank to achieve the water quality objectives.

Table 22 Water quality targets

Requirement	Target Reduction	Reduction Achieved
Total Suspended Solids	80%	84.1%
Total Phosphorus	40%	51.3%
Total Nitrogen	40%	40%
Gross Pollutants	90%	100%

6.15 Flood Risk

A Flood Risk Impact Assessment (FIRA) has been prepared by Mott MacDonald at Appendix K to consider the existing flood risk, and likely changes to that risk due to the proposed development.

The site is affected by overland flooding in the 1% Annual Exceedance Probability (AEP) event and Probable Maximum Flood (PMF) storm events.

Under existing conditions, the site is prone to flooding during all storms up to and including the PMF. The primary source of this is overland flow paths throughout the site, which converge at a low point within the northern side of Pembroke Street. This can be attributed to the existing building massing and landscaping within the site, which do not concentrate flows to a single overland flow channel. The nature of flooding is flash flooding with a short duration of less than 6 hours.

The proposed development implements a number of flood mitigation measures to manage flood risk and ensure the proposed development does not result in any significant impacts. This includes the implementation of flood planning level adjustments to residential levels and basement access levels and the channelisation of overland flows within the site to the internal roadway and graded open spaces. Flood planning levels for both the basement and residential entries exceed both the PMF and the 1% AEP, plus 0.5m freeboard, in accordance with Sutherland DCP and flood emergency management requirements.

A summary of the proposed flood mitigation measures is provided in Table 23.

Table 23 Proposed flood mitigation measures

Measure	Mitigation
Dual purpose courtyard and overland flow path channel	Prevents the water extent within the courtyard from reaching the entrance of the buildings in minor storms.
Proposed design of internal roadway	Intercepts overland flows throughout the Site and channels them towards the previous discharge point.
Realignment of the existing drainage network	The current configuration of the drainage network would be impacted by the proposed basement configuration. Subsequently, there is an opportunity to realign this network and, in doing so, upgrade the network and connect it to another network within the new proposed roadway. In doing so, there is an opportunity to improve the nuisance flooding during minor storms within the Site.
Shelter-in-Place Flood Planning Levels (FPL's)	The adoption of the PMF as the FPL within the Site, or within shared spaces where all residents would have access to, to mitigate risk.

The key flood mitigation measures for major storms implemented within the proposed development is the proposed internal roadway and the inclusion of a depression within the northern courtyard.

These measures assist in channelising the flows within the site to limit impact, as well as ensure pre-existing overland flow routes discharge points from the site are maintained. Subsequently, these measures prevent an alteration in flood extent outside of the site of proposed development. Additionally, these proposed measures will also provide an increase in formal on-site flood storage, which is considered less of a risk to people than informal localised depressions acting as flood storage.

The FIRA confirms that flooding impacts are primarily contained within the site and the Pembroke roadway and the proposed development will not result in any significant impacts to surrounding properties. The FIRA notes there is an increase in the flood level for two properties directly to the south of the site of development; however, these properties are subject to flooding during the existing and post-development scenario, and the proposed development does not alter the peak flooding hazard within either of these properties.

In the existing scenario these properties have a peak flood depth of 0.65m, and in the post-development scenario, a peak flood depth of 0.67m. Therefore, the FIRA confirms that the proposed development will not result in any material impacts outside of the site.

The FIRA adopts a Flood Planning Level for residential buildings and basement entrances being the PMF level which aligns with the Sutherland DCP and the Shelter in Place Guideline for Flash Flooding (DPHI 2025).

It sets out that the proposed design ensures all habitable floors and basement car park entrances are set above both the 1% AEP flood level plus 500mm freeboard and the PMF level, in accordance with the Shelter in Place guidelines. The FIRA confirms that in all cases across the site, the 1% AEP flood level plus 0.5m freeboard exceeds or equals the PMF flood level.

These measures guarantee that the building and basement car parking remains flood-free under all scenarios, including the PMF.

6.15.1 Emergency Response Measures

The FIRA recommends the primary flood emergency strategy for the proposed development to be to evacuate before the onset of the storm to a safe location. The FIRA confirms that safe egress via Florida Street is feasible due to the low hazard of flooding (H1) on Florida Street in all flood events. However, the proposal has been designed to allow for shelter in place as a suitable flood management response for all storm events up to and including the PMF.

The FIRA recommends the preparation of a Flood Emergency Response Plan (FERP) which can be addressed as a condition of consent.

6.16 Noise and Vibration

A Noise and Vibration Impact Assessment has been prepared by E-Lab Consulting (Appendix T) which has considered the following key acoustic elements:

- Noise intrusion from surrounding local roads on the proposed development
- Noise impacts from the operation of the development on surrounding noise sensitive receivers
- Noise and vibration impact from construction activities on surrounding noise sensitive receivers.

Noise Intrusion

The Noise and Vibration Impact Assessment has been informed by a preliminary façade noise model of the development to predict the road noise impacts and recommend required acoustic glazing to mitigate impacts to bedrooms and living areas.

To achieve the relevant internal noise criteria the assessment recommends several standard noise attenuation measures including specific glazing thickness ranging from 6.38mm to 12.5mm for habitable rooms.

The assessment recommends that the specific acoustic ratings for each façade element detailed in the Noise and Vibration Impact Assessment should be reviewed and specified at the detailed design stage.

The assessment confirms that through the implementation of the recommended mitigation measures detailed in the Noise and Vibration Impact Assessment, the proposal will comply with the relevant internal noise criteria. This is reflected in the Mitigation Measures at Appendix C.

External Noise Emission

The primary potential noise emissions from the proposal includes mechanical plant noise and potential noise emissions from communal open space.

The assessment recommends that mitigation measures for the mechanical plant should be considered during the design development stage to ensure compliance with the relevant criteria at the nearest sensitive receiver catchments. These mitigation measures could include but not limited to the following:

- Positioning mechanical plant away from nearby receivers
- Acoustic attenuators fitted to duct work
- Screening/acoustic louvres around mechanical plant
- Acoustic insulation within duct work

Noise from the use of outdoor communal open spaces should be mitigated with the following measures:

- Use of the outdoor communal area to be restricted to the day and evening period (7am – 10pm)
- Signage displayed reminding residents to be considerate and minimise noise while the space is in use (i.e. no shouting, restriction on any amplified music, and that the outdoor communal space is not to be used for parties), especially during noise sensitive hours of the day.

Construction Noise Impacts

The Noise and Vibration Impact Assessment has estimated demolition and construction noise levels to sensitive receivers based on the following assumptions:

- The predicted noise levels represent the worst-case scenario for each receiver
- Neutral weather conditions.

The assessment indicates that potential noise impacts associated with demolition, excavation and construction works are not expected to exceed the 'highly effected noise criteria' of 75dB(A) which represents the point at which there may be strong community reaction to noise.

The assessment indicates that it likely the predicated noise levels for the construction works will exceed relevant noise management levels; however, these impacts can be appropriately managed through preparation and implementation of a Construction Noise and Vibration Management Plan which will include the recommended mitigation measures in the Noise and Vibration Impact Assessment.

The Noise and Vibration Impact Assessment sets out recommended construction monitoring requirements to management vibration impacts which should also be included in a future Construction Noise and Vibration Management Plan once construction methodologies are known.

This is reflected in the Mitigation Measures at Appendix C.

6.17 Waste Management

An Waste Management Plan (Appendix X) has been prepared by MRA Consulting Group which calculates expected waste streams in accordance with relevant policies and provides advice on the management, storage and collection of waste for the proposed development.

Chute systems are proposed to be implemented for each building. Building 1, Building 2 and Building 3 will be serviced by a single dual-chute system for general waste and recycling. The Social Building will include two dual-chute cores, servicing Social Building A (86 units) and Social Building B (73 units).

A bin cupboard will be located on each residential floor to house the chute inlets and 1 x 240L FOGO bin. These cupboards will be appropriately sized to accommodate the necessary infrastructure. Building management will be responsible for monitoring bin fullness and rotating full FOGO bins with empty ones.

Consistent with the recommendations of the Operational Waste Management Plan the proposed development compiles with the following waste management and storage areas.

Table 24 Waste storage requirements

Development	Waste stream	Area
Building 1 - North	General waste	21sqm
	Recycling	56sqm
	FOGO	14sqm
	Bin room area	91sqm
	Bulky waste	36sqm
Building 2- South	General waste	7sqm
	Recycling	17sqm
	FOGO	6sqm
	Bin room area	30sqm
	Bulky waste	12.5sqm
Building 3 – West	General waste	14sqm
	Recycling	35sqm
	FOGO	9sqm
	Bin room area	58sqm
	Bulky waste	23sqm
Social Building	General waste	17sqm
	Recycling	51sqm
	FOGO	12sqm

	Bin room area	80sqm
	Bulky waste	34sqm

Waste will be collected by Council through a wheel-out/wheel-back service, with bins transferred from the waste rooms to loading zones provided in front of each building's ground-level bin room to allow collection vehicles to park and for Council staff to access the bins safely.

For the Social Building, a dedicated loading zone is proposed located on Pembroke Street, with a connecting pathway of approximately 13metres between the bin room entrance and the loading area. For the Market Buildings, waste collection will occur within the proposed loading zones located along the shared private road.

The Plan confirms that proposed development includes appropriately sized waste storage rooms for each building and provides suitable servicing arrangements for residents, building management, and the waste service provider (Sutherland Shire Council) and no additional mitigation measures for waste management are considered necessary.

6.18 Social Impact

Overall, the proposed development is expected to deliver a positive social impact by providing modern, fit-for-purpose social housing that responds to the demand and housing needs of the Sutherland Shire.

This section outlines the site's strong access to transport, services, and community infrastructure, the demographic profile of the area and the critical need for smaller and more affordable dwellings in the Sutherland Shire. It also addresses the relocation of existing residents, which will be managed in line with *Homes NSW's Strategic Tenant Relocation Policy* to ensure impacts are appropriately mitigated.

Access to infrastructure and services

Strategically positioned, the site is well served by public transport with major bus routes directly adjacent to the site along the Princes Highway and Port Hacking Road. site offers excellent access to amenities and services with significant mixed use in the area including Southgate Shopping Centre to the west across Port Hacking Road.

The site is within 200 metres of the Canberra Road reserve comprising a playground, community hall and sporting oval and is within 600 metres to the Sylvania Foreshore Bushland Reserve on the Georges River. Sylvania Public School is 400 metres from the development and Sylvania Secondary School is 600 metres from the site.

Social Housing Demand

The demand for increase housing, particularly social housing in the Sutherland Shire is increasing and increased housing is needed to meet demand. Existing social housing is generally not fit for purpose, is not built to contemporary standards, and the existing stock does not match housing need.

The proposal will increase in social housing on site providing a positive social impact. The proposal will result in an increase from the existing 83 social housing dwellings to 159 modern and fit for purpose social housing apartments (an increase of 76 social dwellings on the site).

In the Sutherland Shire social waitlists are increasing and the largest demand being one- and two-bedroom apartments. Based on current social housing waiting lists for the Sutherland Shire the demand for dwellings with up to 2-bedrooms is 85% of total housing demand.

The proposal responds to the demand for smaller dwellings, by providing an appropriate mix of apartments, including a larger number of one-bedroom and two-bedroom apartments within the proposed Social Building to meet the required social housing needs in the Sutherland Shire.

Social Impact

Overall, the proposal will have an overall positive social impact, delivering increased social housing in proximity to public transport and services and amenities. The proposal would also provide new social benefits through the renewal of the site to provide a mixed tenure community, and provision of new high-quality housing and associated publicly accessible communal open space and landscaping across the site.

Social impacts arising from the relocation of the existing residents at the site have been carefully considered in the staging of the proposed development. The delivery of the Social Building within the first stage of development will minimise impacts to existing tenants. A key objective of the proposed development is to minimise displacement of existing social housing residents on site during the construction of the new social housing component of the development.

The proposed staging provides the opportunity of tenants within the Stage 2 portion of the site to move directly into the Social Building in the first stage of development, prior to the commencement of construction on the market housing in Stage 2.

Further, any relocations would be managed in accordance with the *Homes NSW Strategic Tenant Relocation Policy* to ensure that any potential impacts to existing residents are appropriately managed and mitigated.

Homes NSW will manage communication with existing residents in an ongoing manner throughout the project as it progresses and tenants would be given at least six months' notice before needing to move and would be provided with assistance to do so including in incurred costs and providing dedicated Relocation Officers and a Tenants Advice Line to ensure residents have appropriate access to information and support. Existing social housing residents at the site would have the opportunity to return to a property at the site once operational (on the basis of an 'expression of interest to return').

6.19 Construction Impacts

A Comprehensive Construction Management Plan including a detailed construction certificate staging plan will be prepared and submitted prior to the commencement of works.

This is included in the Mitigation Measures at Appendix C.

6.20 Contributions and Public Benefit

The proposal will deliver significant public benefit in the form of increasing housing and supporting the renewal of existing social housing within the local area.

The proposal provides for 484 new dwellings, including 159 social dwellings and 325 market dwellings. The proposal provides the opportunity for renewal of a large strategically located site and will facilitate renewal site to deliver a mixed tenure community and increased social housing on the site.

The proposed development will replace the existing 83 social dwellings on site, with 159 new social dwellings – an increase of 76 social dwellings on the site.

The proposal will also provide the opportunity for increased housing supply, enhanced permeability and improved public domain outcomes in the local area.

6.20.1 Local infrastructure

The site is subject of the Sutherland Shire Section 7.11 Development Contribution Plan 2016, (Contribution Plan).

The Contributions Plan includes an exemption for Affordable Housing undertaken by a social housing provider, as defined by the Housing SEPP. Therefore, the social housing component is exempt from contributions under the Plan.

Local contributions will apply to the market dwellings in accordance with the applicable contributions in the Contribution Plan.

6.20.2 State infrastructure

Social housing is exempt from the payment of state infrastructure contributions in accordance with the Housing and Productivity Contribution (HPC).

Contributions will apply to the market dwellings in accordance with the applicable rates in the HPC.

7 Justification of the Project

The proposal is consistent with the strategic framework

The proposal directly responds to the NSW Government's commitment under the National Housing Accord to deliver approximately 377,000 new well-located dwellings by 2029. It will deliver much needed housing, including social housing, in a well-located area serviced by public transport, jobs and services and will support the delivery of the Sutherland Shire Council's Housing Target of 6,000 new homes to be completed by 2029.

It also implements the strategic objectives of the NSW Government's low and mid rise housing reforms introduced in February 2025 which aim to increase housing supply in walking distance of identified centres and stations.

The development will renew 83 existing social housing dwellings, to deliver increased housing supply, including increased social housing, in well-located and accessible area. The proposal will provide for a total of 484 new homes including 159 new social housing dwellings (providing an additional 76 social housing dwellings on the site) and 325 market dwellings to deliver increased housing supply across the site.

The proposal is also consistent with the priorities and actions in the Sutherland Local Strategic Planning Statement and Local Housing Strategy relating the renewal of social housing in the Sutherland Shire. The proposal directly responds to the NSW Government and Sutherland Shire Council's strategic objectives to increased housing supply in well-located areas close to existing centres and public transport, and to deliver more social housing to meet the urgent need for social housing.

The proposal is generally consistent with the statutory planning framework

The proposal is generally consistent with the statutory planning framework, including the objects of the EP&A Act, and the provisions in Chapter 2 and Chapter 6 of the Housing SEPP as outlined in the Statutory Compliance Table at Appendix B.

The proposal seeks a variation to the maximum permissible height control which is addressed in the Clause 4.6 Report at Appendix D.

The EIS is consistent with the principles of ecologically sustainable development in accordance with Clause 192 of the EP&A Regulation 2021 and is addressed in the ESD Report at Appendix M.

The site is suitable for the proposal and all likely impacts can be appropriately mitigated

The environmental impacts have been carefully considered through the preparation of the proposed development as detailed in this EIS and supporting documentation and as summarised below:

- The proposal aligns with the strategic objectives of the NSW Government's low and mid rise housing reforms to increase housing within walking distance to identified centres – which includes Southgate Shopping Centre.
- The proposal achieves a quality design outcome that will deliver a high level of internal amenity for future residents by optimising solar access, cross ventilation and privacy for residents.
- The proposal minimises overshadowing and amenity impacts within the site, and will not result in any unacceptable overshadowing, privacy or amenity impacts to neighbouring properties.
- The proposal has been designed to respond to the surrounding streetscape, providing generous landscaped setbacks to maximise tree retention and tree planting.

- The proposed development will deliver landscaping, communal open space, deep soil and tree canopy outcomes that exceed relevant targets, including 30% deep soil and 31.5% tree canopy.
- The proposal will not result in any unacceptable traffic or transport impacts and provides on-site parking in accordance with requirements in the Housing SEPP and Sutherland Shire DCP.
- The proposal will not result in any heritage or archaeological impacts.
- The proposal is designed safely above the relevant flood levels to mitigate flood risk on site and will not result in any significant impacts to flood behaviour on the site or surrounding properties.
- The proposed development will deliver ecologically sustainable development in accordance with NSW Government sustainability targets.
- All noise and vibration impacts can be appropriately managed subject to mitigation measures.
- Stormwater management measures have been identified to ensure the proposed development will not result in any stormwater quantity and quality impacts.
- A Remediation Action Plan has been prepared to outline the remediation strategy for site contamination to ensure that the site is suitable for the proposed use.
- A Waste Management Plan has been prepared which confirms that waste streams associated with the demolition, construction and operation of the development can be appropriately managed.
- A Comprehensive Construction Management Plan will be prepared prior to the commencement of works to detail the management of impacts on the surrounding area during construction.

The proposal is in the public interest

The proposal is in the public interest as it will:

- Facilitate the renewal of the site to deliver a new high quality mixed tenure development delivering 159 social dwellings and 325 market dwellings in a well-located area, within walking distance to public transport, jobs and local services.
- The proposal directly responds to the NSW Government strategic objectives and priorities to increase housing, including social housing, in well-located areas and close to centres.
- Increase the supply of social housing which directly aligns with the NSW Government's priorities in accordance with the National Housing Accord 2022, as well as local housing targets for Sutherland Shire to deliver 6,000 new homes by 2029.
- Respond to the shortage of social housing in Sutherland Shire LGA and provide new high quality social housing to provide increased housing diversity and choice in the local area.

Conclusion

This EIS demonstrates that proposal is consistent with the strategic planning framework, will not result in any unacceptable environmental, social, or economic impacts, and is in the public interest.

There are no known site conditions that would prevent the proposed development from proceeding, and all likely impacts can be appropriately mitigated. It is therefore recommended that the application is approved.