

Response to Request for Information – DA-301/2026

Proposed Affordable Housing Residential
Flat Building at 15 Spence Street & 171-173
The River Road, Revesby

August 2026

On February 1 2024, Homes NSW, a division of the Department of Communities and Justice (DCJ) was formed. It has brought together the housing and homelessness services of DCJ with the NSW Land and Housing Corporation (LAHC), Aboriginal Housing Office (AHO) and key worker functions from across government under one roof.

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1 Discussion

In response to Council's correspondence dated 2 July 2026 in relation to the Development Application DA-301/2026 for the demolition of existing structures, removal of trees, consolidation of allotments, construction of a 5-storey affordable housing residential flat building comprising 36 apartments over basement carparking with 16 spaces, including associated landscaping and fencing works, Homes NSW has amended the proposal to address the concerns raised in Council's letter. A discussion of the amendments is provided below in Table 1, and the amended proposal is accompanied by the following information:

1. Amended Architectural Plans, prepared by Thomson Adsett Architects.
2. Stormwater Plans, prepared by Enscape Studio.
3. Amended Transport Assessment Report, prepared by asongroup.

Table 1: Response to Council's RFI Dated 2 July 2026

Council Comment	Homes NSW Response
Planning	
The subject application seeks approval for the departure of several controls relating to building separation, solar access, building setbacks, private open space and basement and driveway setbacks. These departures will be addressed as part of the assessment of the application and presented to the Canterbury-Bankstown Local Planning Panel (LPP) upon determination of the application.	Noted.
Parking spaces should be clearly labelled so there is no conflict or confusion amongst different users.	Adaptable parking spaces have been labelled in accordance with their corresponding adaptable units.
Setback entrances at the main entrances in Spence Street should be reconsidered as there are areas of concealment of people exiting the building. Entrances should be aligned with the building and should be visible from street.	The design incorporates recessed entry points to provide shelter, articulation and defensible space. There is sufficient passive surveillance from the street, and also within the site from units either side of the entry ways. Further to this, the inset setback entrances have also been designed as such due to FSR compliance. The FSR standard applicable to the development is 1.5:1. The proposed FSR is 1.5:1. To amend the inset setback entrances would increase the FSR beyond the standard, triggering a non-compliance.
Urban Design	
Bulk, Massing and Modulation	The development has been deliberately designed to establish a clearly identifiable corner building through: • a curved corner address to two public streets; • a distinct upper-level form; • contrasting built-form elements; • corner balconies and window groupings; • modulation responding to the site's topography; and

		material palette that differentiates the corner component from adjoining elevations. Importantly, the Design Review Panel's original advice acknowledged that the proposal already "acknowledges the corner position" and broadly supported the form and external appearance of the building. Homes NSW does not consider further substantial architectural modification necessary to achieve design excellence. The corner is already legible within the streetscape and provides an appropriate architectural response without relying on excessive visual embellishment.
Relationship with Neighbouring Properties		Homes NSW has carefully reviewed Council's request and does not support relocation of the substation. The current location represents the most balanced outcome when considering: - utility authority access requirements; - CPTED principles; - streetscape presentation; - engineering feasibility; - cost implications; and - residential amenity. Relocation to the north-eastern corner would: - create a concentration of service infrastructure at the building's primary frontage and address; - reduce passive surveillance opportunities; - introduce additional fencing within prominent view corridors; - adversely impact the residential presentation of the development; and - compromise the quality of the Spence Street frontage. Similarly, basement relocation is not technically feasible due to ventilation, access, Ausgrid requirements, fire separation requirements and significant impacts upon basement parking and manoeuvring arrangements. The substation has already been integrated into the design through fencing, landscaping and setbacks. Homes NSW therefore considers the existing location to represent the optimal planning and urban design outcome.
Architectural Materiality	Expression and	Homes NSW respectfully submits that the proposal has adequately responded to the intent of the Design Review Panel's recommendations and already achieves a high-quality architectural outcome through a combination of building modulation, material variation, articulated façade treatments and contrasting building forms. The DRP recommendation sought consideration of a more permeable façade treatment to introduce subtle distinction between the two building components. The recommendation was not a requirement that all balcony treatments be amended but rather an invitation to explore opportunities for differentiation.

	The submitted design already incorporates: distinct building volumes; • varied balcony arrangements; • contrasting recessed and projecting elements; • articulation responding to the corner setting; • an updated darker material palette adopted in response to DRP comments; and • varied façade depths and openings which visually distinguish different parts of the building. Importantly, the retention of solid balcony balustrades is deliberate and serves several functional purposes in: • improved visual privacy for residents; • enhanced acoustic buffering from The River Road; • reduced maintenance requirements; • greater durability over the life of the building; • improved CPTED outcomes through clearly defined private spaces; and • consistency with Homes NSW operational requirements for long-term asset management. Homes NSW notes that design excellence does not require full compliance with all recommendation of the Design Review Panel, as the legislation requires that the advice be considered. The proposal has demonstrably considered the advice and adopted changes where appropriate while balancing resident amenity, durability and operational management requirements. Accordingly, Homes NSW considers that the current architectural expression achieves an appropriate level of variation and visual interest and does not warrant significant redesign.
Sitting and Circulation	Home NSW respectfully submits that the development has already appropriately responded to the Design Review Panel's recommendations having regard to the operational requirements of affordable (social) housing and the physical constraints of the site. The DRP itself acknowledged that Homes NSW developments do not favour large congregation spaces and expressly suggested smaller incidental opportunities for interaction as an alternative approach. The proposal adopts this principle through: • landscaped communal open space; • dual street entries; • common circulation areas; • entry courtyards; • accessible circulation networks; • generous communal landscape areas; and • passive surveillance opportunities throughout the ground plane. The development provides approximately 438m² of communal open space, exceeding minimum communal open space requirements under the ADG. This space has been designed as

	the primary location for resident interaction and social engagement. Homes NSW does not consider that additional congregation spaces within lobby areas would materially improve residential amenity when a substantial communal open space already exists elsewhere on the site. Rather, such spaces may result in duplicated functionality and less efficient use of floor area.
Services and Utilities	The proposed bin room has been updated to reflect the requested intent as per the amended architectural plans submitted as part of this response.
Green Infrastructure	Homes NSW has already worked to incorporate seating opportunities where appropriate, and caution is exercised in over-programming the front setback areas. Homes NSW developments are designed to balance: • community interaction; • resident safety; • passive surveillance; • maintenance considerations; and • CPTED outcomes. The proposal already provides substantial communal open space areas and landscaped gathering opportunities elsewhere on the site. Additional congregating spaces within narrow frontage landscapes may not materially improve residential amenity and may result in unintended management outcomes and anti-social behaviour. The submitted landscape design already prioritises high-quality planting, passive surveillance and wayfinding functions. The principal communal open space has been amended as part of this response and now receives 50% of solar access for at least 2 hours on the 21 June (see below). It should be noted that: • the ADG is a performance-based design guide rather than a strict numerical code; • objective compliance is to be considered holistically; • the development provides 438m² of communal open space exceeding minimum area requirements; • extensive landscaping has been incorporated; • accessible seating areas are provided; • 83% of apartments achieve required solar access levels; • only one apartment receives no winter sunlight; and • the development provides 36 social housing dwellings in a highly accessible location.
Apartment Design Guide	
The submitted drawings indicate that only 103.50m² of the Principal Usable Communal Open Space (292.06m²) receives a minimum of	The principal communal open space has been amended as part of this response, as noted on drawing No. A-4-45. The principal communal open space now receives 50% of solar access for at least 2 hours on the 21 June in accordance with

2 hours direct sunlight between 9am and 3pm on 21 June. This represents 35.4% of the Principal Usable COS, which does not satisfy the ADG requirement of 50% minimum (146m² required). Revised plans must be submitted demonstrating full compliance with the solar access provisions of the ADG.

the guidelines of the Apartment Design Guide. See Figures 1 and 2 below.

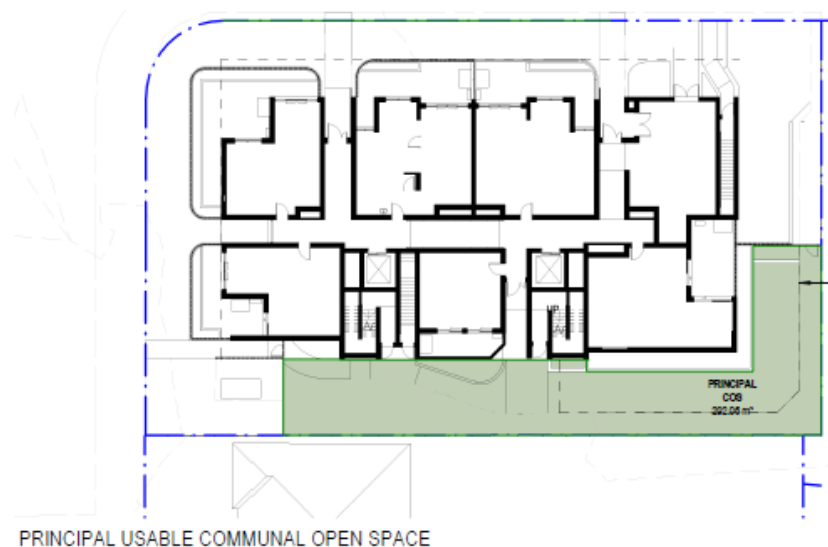


Figure 1: Principal COS (Lodgement), Thomson Adsett, 16/02

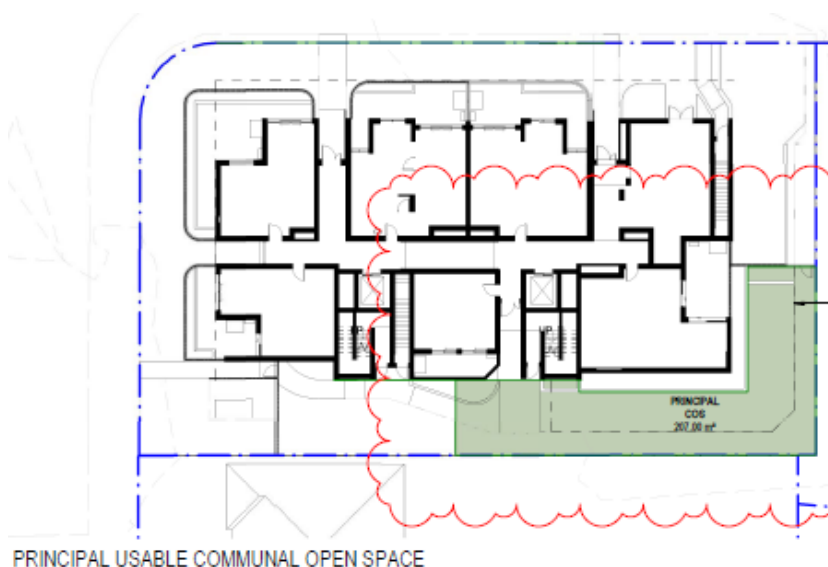


Figure 2: Principal COS (Amended) Thomson Adsett, 18/08

Traffic

A Traffic Signal Management Plan for the car park traffic signal system be submitted. This plan must include the operational details of the Traffic Control Signal system, as well as the manufacturer's specifications and design details.

On site traffic controls have been addressed as part of the submitted Transport Report. Homes NSW therefore requests that the preparation of a detailed Traffic Signal Management Plan be addressed by way of condition as part of the consent if considered necessary.

Sight triangles are to be shown at driveways, in accordance with AS 2890.1:2004, Figure 3.3 – Minimum Sight Lines for Pedestrian Safety. The sight triangles shall extend 2m from the driveway edge along the front boundary and 2.5m from the boundary along the driveway and is to be kept clear of any obstructions on either side of the

Sight triangles have been prepared and shown as part of the response package and is shown on plan no. A-1-10.

driveway. Amended plans providing these details must be submitted.	
Amended plans that show the driveway widths and proposed layback on swept path diagrams must be provided.	Amended plans have been provided which now show driveway widths, layback, and swept path diagrams.
The proposal for the conversion of existing unrestricted on-street parking along the site frontage to a loading zone is not supported. On-street loading zones are generally provided to service businesses. Any loading associated with the development must be accommodated within the site. The Transport Assessment Report must be amended to remove this from the proposal.	The Transport Report has been amended which now reflects the return of the existing on-street parking and the loading zone has been removed as requested.
Stormwater Plans	
Our Development Engineer has reviewed the proposal and advised that the detailed stormwater plan C-15, as noted has not been submitted or included as part of the application. To enable Council to assess the stormwater design of the on-site detention (OSD) system, Council requests a full set of the stormwater plans be submitted.	Plan no. C-15 of the Detailed Stormwater Plan has been provided as part of the response package.
Landscaping	
The submitted plans show a tree close to the proposed driveway. All trees must provide a minimum clearance of 2 metres from any driveway.	The tree located near the site entrance is an existing tree situated outside the property boundary. Approval from Council would therefore be required before it could be removed. Homes NSW is requesting Council would support removal of this tree should and a suitable replacement be implemented. Homes NSW would agree to the imposition of a condition to this effect.
The principal usable communal open space area (292.06m ²) is largely located above the basement extent. Details must be provided to confirm that communal open space areas above the basement are designed with adequate soil depth to support meaningful landscaping.	Homes NSW notes that landscaped communal open spaces above basement structures are common in residential apartment developments throughout metropolitan Sydney. The proposed landscape design has been prepared by qualified landscape architects and includes substantial raised planting zones designed specifically to accommodate the nominated tree and shrub species. The request for additional soil depth information is accepted; however, the existence of basement structures beneath portions of communal open space should not be interpreted as indicating an inability to provide meaningful landscaping outcomes.
Submissions	

You are invited to provide a response to these concerns for Council's consideration.

A response to submissions has been provided and detailed as follows below.

1.1 Response to submissions:

The application was notified for a period of twenty-one (21) days in accordance with Canterbury-Bankstown Community Participation Plan 2022. Within this period, Council received three (3) submissions raising concerns in relation to the proposal's unreasonable privacy impacts, acoustic impacts, tree removal and loss of local amenity, the building's excessive bulk and scale, incompatibility with the established character, inadequate and incomplete assessment of the northern impacts upon the adjoining properties, traffic, parking and road safety impacts, provision of inadequate car parking, servicing impacts, basement access design, the proposal being an overdevelopment of the site and its failure to comply with all applicable controls. A response to submissions has been detailed as follows:

Existing traffic congestion on Spence Street

The site is located within an accessible area approximately 450m from Revesby Station and immediately adjacent to bus services. A Transport Assessment prepared by asongroup accompanied the application and concluded that the development would generate an additional 4 vehicle trips in the AM peak hour, 3 vehicle trips in the PM peak hour and 22 vehicle trips per day overall. The report concluded these increases would not materially affect the operation of the surrounding road network. The proposal complies with the Housing SEPP parking provisions for affordable (social) housing and is located in an area intended to support high density development in a highly accessible area.

Existing commuter parking pressures

It is acknowledged that commuter parking occurs within the locality due to the site's proximity to Revesby Station. However, existing parking demand attributable to commuters is an existing condition rather than a consequence of the proposed development. The proposal provides parking in accordance with the non-discretionary parking standards of the Housing SEPP. Compliance with these standards prevents the consent authority requiring a more onerous parking rate.

Traffic assessment understates impacts

The traffic assessment prepared recognised traffic engineering methodologies. While submitters contend that percentage increases are significant, traffic impacts are generally assessed on actual network capacity and operational performance rather than percentage increases from a low baseline. The submitted assessment concludes road capacity remains satisfactory.

Spence Street / River Road intersection safety

The concerns are noted. The proposed access point is located on Spence Street and was subject to engineering review through the Transport Assessment. Council's pre-DA review specifically raised vehicle queuing and access issues, resulting in a revised driveway and waiting bay design. No evidence within the submitted traffic assessment indicates unacceptable intersection performance.

Single-lane basement ramp

The ramp design was specifically reviewed during the pre-DA process. The development incorporates a traffic signal system, a basement waiting bay and a street-level waiting bay. Council officers requested verification of vehicle movements and visibility, and swept path modelling was subsequently provided demonstrating satisfactory operation. The Transport Assessment concludes that safe entry and exit can be achieved.

Reliance on resident compliance with signals

Signal-controlled single-lane basement access arrangements are commonly used in medium-density and residential flat building developments on constrained sites. The proposal incorporates a push-

button operated traffic management system supported by waiting bays to manage vehicle conflicts. Detailed design would be subject to engineering certification prior to occupation.

Parking space manoeuvrability

Council's pre-lodgement review requested additional swept path modelling for Spaces 12 and 13. The applicant provided swept path analysis demonstrating adequate vehicle manoeuvrability and advised that parking spaces have been designed to comply with AS2890.1.

Emergency vehicle access

Emergency vehicle access is achieved from the public road network. The development does not alter road widths external to the site and no evidence has been provided demonstrating that emergency access would be compromised. Detailed compliance with fire safety and access requirements will be assessed at Construction Documentation stage.

Loss of on-street parking due to loading zone

The proposed loading zone has been removed as part of the amended package in response to Council's RFI.

Kerbside servicing arrangement

Council's Waste Team reviewed the proposal and specifically advised that collection from Spence Street was acceptable and preferred to collection from The River Road. An Operational Waste Management Plan has been submitted demonstrating compliance with Council's waste requirements.

Waste collection impacts

The proposed collection method utilises Council's standard collect-and-return service. The waste room is located within 10m of the collection point and has been assessed as compliant through the Operational Waste Management Plan. Council's Waste Team raised no objection.

Construction traffic impacts

Construction impacts are temporary and can be managed through standard consent conditions, including preparation of a Construction Traffic Management Plan, nominated haulage routes, site management requirements and restrictions on construction vehicle parking.

Construction noise

Construction noise impacts are acknowledged and are a temporary consequence of development. Standard conditions relating to construction hours, noise management and community notification can adequately manage impacts. The existence of temporary construction impacts is not uncommon for urban redevelopment sites and is not of itself a reason for refusal.

Privacy impacts and overlooking

Privacy impacts were specifically considered during both Council's Pre-DA review and the Design Review Panel process. The proposal generally complies with ADG building separation standards, with only minor upper-level encroachments. Additional privacy measures have been incorporated, including screening, increased parapet heights and landscape buffering. The SEE concludes that acceptable visual privacy outcomes are achieved.

Overdevelopment / excessive height and bulk

The site is zoned R4 High Density Residential and was rezoned from R2 Low Density Residential in 2023. The Housing SEPP expressly permits bonus FSR and height for affordable housing developments in accessible areas. The proposal complies with the maximum achievable SEPP standards of 1.5:1 FSR and 16.9m height. The level of development is therefore anticipated by the applicable planning framework.

Inconsistent with local character

While the current streetscape predominantly contains detached dwellings, the locality is undergoing transition following the rezoning to R4 High Density Residential. The Housing SEPP requires consideration of future desired character as well as existing character. The proposal is consistent

with the strategic intent of the zoning and provides the type of development envisaged by the planning controls.

Solar access non-compliance to communal open space

The SEE acknowledges that the principal communal open space does not achieve the ADG target of 50% receiving two hours sunlight. However, the proposal has been amended in response to Council's RFI letter dated 2 July 2026, such that the principal communal open space now receives 50% solar access in accordance with the guidelines of the ADG 3D-1.

Parking shortfall (16 spaces for 36 units)

The proposed parking provision exceeds the minimum requirement under the Housing SEPP affordable housing parking rates. Sixteen spaces are required to satisfy the statutory non-discretionary standards. The consent authority cannot apply more onerous parking requirements where these standards are met. It should also be noted that the site is located within a highly accessible area, within 450m of Revesby Station.

Acoustic impacts

A detailed Noise Impact Assessment accompanies the application and identifies mitigation measures to achieve required internal acoustic amenity levels. The report was prepared having regard to road traffic noise from Spence Street and The River Road. Compliance with recommended acoustic treatments can be secured via condition of consent.

Tree removal

An Arboricultural Impact Assessment was submitted. Four trees within the site are identified as removable, while two street trees will be retained and protected. One street tree requires removal to facilitate vehicle access. Replacement planting substantially exceeds tree losses, with 34 replacement canopy trees proposed together with additional street tree planting.

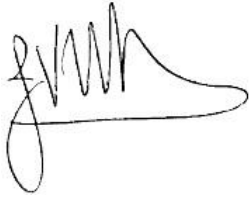
DCP non-compliances (basement setback and driveway setback)

The SEE acknowledges minor variations to basement and driveway setback controls. Homes NSW justifies the variations on engineering and manoeuvring grounds. The variations are minor and do not result in any significant adverse impacts.

Public interest

The proposal delivers 36 affordable (social) housing dwellings in a location close to public transport, services and employment opportunities. The SEE notes that over 67,000 households are currently on the NSW social housing waiting list, including approximately 3,022 households within the Bankstown allocation zone. The proposal contributes to addressing demonstrated housing need and aligns with State and local housing strategies.

Prepared by



Date: 19 August 2026

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Reviewed and Endorsed By



Date: 19 August 2026

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