

06 November 2024

David Green - Land Use Planning Manager
Wollongong City Council

Via email: DGreen@wollongong.nsw.gov.au

Dear David,

PP-2024/3 Gwynneville Precinct Planning Proposal – Supplementary package outlining response to matters raised as a result of preliminary notification and feedback from Council

1. Background

This correspondence relates to the planning proposal submitted by Homes NSW to support renewal of NSW Government and privately-owned housing stock within the Gwynneville precinct to increase the supply of social, affordable and diverse market housing.

The Gwynneville Planning Proposal (planning proposal) was submitted to Council in July 2024 and underwent preliminary notification for a 28-day period until 30 August 2024. The purpose of the preliminary notification was to assist Council in its initial assessment of the planning proposal. Preliminary notification sought to identify any fundamental matters to be addressed prior to the proposal being reported to Council, with the request to submit the proposal to the Department of Planning Housing and Infrastructure (DPHI) for a Gateway determination.

The purpose of this supplementary package is to respond to matters raised by Council planning officers in relation to preliminary notification of the planning proposal, as well as discussions between officers and Homes NSW representatives. It outlines necessary amendments to the submitted planning proposal required to evolve the master plan concept and implementation approach.

The information provided in this package outlines the intended updates to the planning proposal and master plan to confirm the revised provisions that will form the basis of reporting to Council anticipated to occur in November 2024.

Following the resolution of Council and, if supported, the issue of a Gateway determination by DPHI, it is intended that the planning proposal and supporting documents be more comprehensively updated, prior to public exhibition. This will enable relevant matters raised by Council and any conditions of Gateway to be collectively addressed as the most efficient and effective means of updating the planning proposal.

2. Summary of Communication with Council

Council placed the draft planning proposal and supporting technical documents on non-statutory notification for a period of 28 days. As a result of the notification, Council received a number of submissions from state agencies, Council's internal department stakeholders and the community. Council provided Homes NSW with copies of the Agency submissions together with a summary of issues raised by members of the community. Following the notification process Homes NSW have had 2 meetings with Council including a

workshop session with a primary focus on delivery, number of key sites, key sites boundaries, infrastructure and open space provision. Homes NSW was also invited to present to the Wollongong Local Planning Panel (the Panel) and participated in a “Q&A” session with the Panel. The Panel is due to provide an advice note, which was not available at the time of preparing this correspondence. This document was prepared as a consequence of the working session and the Panel following discussions with Council officers.

3. Summary of updates to the master plan and planning proposal

Specifically, we have been working on identifying opportunities to activate the delivery of social and affordable housing on the Homes NSW site and in support, Council have made a number of suggestions which have been incorporated in these updates.

3.1 Public Open Space

Consideration was given to the need for the central public open space spine through the site on the basis of its proximity of the Gwynneville Precinct to the Wollongong Botanical Gardens and substantial public open space provision in the southern areas of the site through the expansion of Spearing Reserve. Particular concerns were raised by Council about the intended tenure of the central open space element between Sidney and Hoskins Streets. While Council officers recognised that creating a central place for social interaction would benefit residents of the precinct in terms of inclusion and amenity, Homes NSW was advised that a space with the size and configuration proposed was not desirable for dedication as a Council asset. This was due to concerns with the efficiency of ongoing maintenance and management of smaller public spaces. Council officers indicated a preference that the open space be developed, maintained and managed as a Homes NSW asset, and that it not be dedicated to Council. Additionally, Council officers were not supportive of the east west pedestrian links. As such these have since been converted to private communal space that aligns with view lines, maintaining the principle of visual connectivity conceived in the original master plan.

Homes NSW is of the view that the centrally located open space area is an essential component of the master plan and plays a critical role in facilitating inclusion, social interaction and equality between residents of both publicly- and privately-tenured dwellings. In this regard, it is Homes NSW's imperative that the intended space is democratised and public in its nature. Homes NSW remains of the view that the most suitable zoning and tenure arrangement for the delivery of this space is as a RE1 Public Recreation zone and dedicated as a Council asset. This is on the basis that any concerns relating to ongoing management of this space can be addressed with a well-designed, robust and easily maintained landscape treatments, supported by a public domain plan to be developed in collaboration with Council.

Notwithstanding the above, and in response to feedback provided, Homes NSW notes its willingness to establish a publicly accessible open space as a Homes NSW asset. As this element of open space is no longer intended to be dedicated to Council, and “recreation areas” are a permissible use in the R4 High Density Residential zone, the RE1 Public Recreation zone is no longer necessary and has been deleted. Development controls to facilitate the creation of this space will be established through a combination of:

- Key Sites provisions which limit FSR across 4 key site areas that factor in the opportunity for a consolidated area of open space that is accessible to the public, in the general vicinity of Lots 85-85 and Lots 100-101 in DP36218.
- DCP provisions that require delivery of a consolidated area of open space that is accessible to the public. This is to have a minimum area of 2,500sqm, be in the general vicinity of Lots 84-85 and Lots 100-101 in DP36218, and is to be developed for the purpose of a “recreation area” that is publicly accessible in perpetuity.
- DCP provisions to establish the necessary building line setbacks to ensure that the area intended to be developed for publicly accessible open space:
 - remains free of residential development.
 - is suitably embellished to support placemaking, socialisation and community enjoyment.

The above can be further supported by a voluntary planning agreement and section 7.11/7.12 developer contributions plan to include embellishment of the space for public enjoyment.

The updates to the public open space provision have resulted in a reduction to overall area of open space, from 20,800sqm to 16,660sqm as can be seen in Figure 1.



Figure 1 Updated public open space network

In accordance with the above, the mapping proposed in the lodged and notified planning proposal has been updated as illustrated in Section 4.3 of this correspondence.

3.2 Updates to the Master Plan and Implementation Approach

As outlined in the Wollongong Local Planning Panel Assessment Report dated 28 October 2024, Council officers identified that the approach of creating larger key sites may result in complexity and risk in relation to the achievability of the desired land amalgamation patterns. It was agreed that a more targeted focus on already consolidated sites would better facilitate the timely delivery of the intended social, affordable and diverse housing outcomes of the planning proposal.

Homes NSW has investigated an implementation approach that more closely reflects land ownership patterns, with a view to establishing sites that are wholly-owned by the NSW Government. This would allow opportunities for immediate to short term development sites that could be the early focus of Homes NSW-led projects to deliver desired social, affordable and diverse housing outcomes.

To achieve the focus on NSW Government owned sites for short term housing delivery, it was necessary to review the underlying master plan, its urban design principles and implementation framework. These are intrinsic to the integrated approach to deliver intended development and place outcomes.

At the time of lodging the planning proposal, Homes NSW's intention was to facilitate the delivery of 50% social and/or affordable housing for all identified key sites across the precinct to a minimum of 625 such dwellings. This was intended to be complemented by 50% diverse private-market housing also to an expected maximum of 625 dwellings (i.e. 1,250 total dwellings).

Following post-lodgement discussions with Council relating to its feedback on key sites outlined above, Homes NSW has reevaluated the key sites approach as well as its intended mode of delivery. Homes NSW has since identified an opportunity to deliver developments that provide 100% social and affordable housing developments on sites that are wholly owned by the NSW Government. This would effectively enable Homes NSW to expedite delivery of a significant portion of the overall aim for 625 social and/or affordable dwellings in the Gwynneville Precinct. Considering both wholly and majority NSW Government-owned sites, there is sufficient capacity to accommodate the entire social and affordable housing component as demonstrated in the yield analysis provided in Section 3.2.3 of this correspondence.

Social and affordable housing providers such as Homes NSW and Community Housing Providers (CHPs) are reliant on State and Federal funding to deliver social and affordable housing. Homes NSW acknowledges that without such funding, an obligation to provide 50% social and/or affordable dwellings would be unfeasible for private development sites. Enabling some sites to deliver above up to 100% social and affordable housing would mitigate this issue by enable the incremental 'disburdening' of private sites, as delivery of social and affordable dwellings reaches the intended maximum of 625. This approach results in a different balance in the use of planning mechanisms to incentivise and deliver public benefit in conjunction with incentive FSR and building heights.

To ensure the equitable contribution towards the overall public benefit when the intended maximum of 625 dwellings is reached, a complementary funding and delivery mechanism would be required to ensure that any site no longer required to provide public housing provides a proportionate and equitable contribution towards public and social infrastructure improvements.

The above shift in approach and delivery objectives requires reconsideration for how other planning delivery mechanisms proposed by the original planning proposal are used and how they will interface.

3.2.1 Evolving the master plan

In terms of the urban design, there was a was a need to adjust the intended building envelopes to respond to future land ownership boundaries considering potential to create opportunity sites. The master plan was reviewed and built form outcomes considered to allow for identification of wholly NSW Government-owned sites which were nominated as "primary" and "secondary" opportunity sites. This resulted in the need to update the master plan to ensure that these built form outcomes remained consistent with the principles and objectives of the original master plan.

The original and updated master plan concepts are compared in Figure 2 and Figure 3.



Figure 2 Original Master/ Height Plan submitted July 2024 – Including height in storeys



Figure 3 Adjusted concept plan - including height in storeys

The master plan layout has been tailored to:

- provide 35 building envelopes distributed across 5 street blocks;
- ensure future development retains, and responds to, the existing street network;
- enable the delivery of residential flat building typologies on (up to) six (6) key sites owned by the NSW Government, as catalysts for the mid- to long-term redevelopment of the wider precinct;
- ensure building envelope footprints are generally orientated north south so as to maximise solar access to apartments, while minimising overshadowing impacts to mid-block communal landscaped areas;
- expand the existing provision of open space across the precinct, to enhance public amenity and strengthen landscape presence along Murphys Avenue;
- facilitate the distribution of building heights, ranging from three (3) to six (6) storeys across the site, in response to the sloping landform;
- ensure the amended master plan continues to deliver a predominantly four (4) storey development scale, with taller built forms concentrated within the northern portion of the site, adjacent to the larger footprint buildings located within the university campus;
- ensure lower scale forms are presented to the southern, eastern and western precinct edges to minimise visual bulk exposure in relation to surrounding areas;

- distribute three (3) and four (4) storey buildings along Spearing Parade and Paulsgrove Street, within areas which are visible to neighbouring residential areas located south of Murphys Avenue.
- ensure building envelopes fronting the western side of Paulsgrove Street, adjacent to the Botanic Gardens, have the capacity to deliver 'fine grain' building forms which respond to the steep terrain;
- ensure built forms are orientated to provide a residential address to all public streets and green reserves, to provide a sense of 'neighbourhood';
- provide building footprint depths that are consistent with design guidance provided under the NSW Apartment Design Guide (ADG) with a maximum of 22m in depth, to provide for efficient floor plan layouts and good apartment amenity;
- enable the provision of building separation consistent with ADG design guidance to maintain privacy and outlook to apartments and deliver landscape relief between buildings when viewed from public streets;
- provide mid-block built form relief, to facilitate the delivery of well-proportioned and usable communal open space with good solar access and maximised passive surveillance;
- provide building separation to accommodate the delivery of landscaped corridors between built forms and the provision of canopy trees;
- ensure that buildings located east of Paulsgrove Street provide recessed upper floor levels, to minimise perceived built form scale to pedestrian areas;
- provide minimum front setbacks to Madoline Street of 3m and minimum 4m front setback to all other streets of 4m. Where secondary setbacks are provided, these allow for a minimum setback of 3m to accommodate balconies;
- incorporate partial upper floor levels on some building envelopes, to enable flexibility and the delivery of rooftop open space;
- ensure building lengths do not exceed 60m in overall length;
- achieve building envelope proportions capable of delivering workable floor plate layouts with adequate flexibility to provide built form modulation and façade articulation; and
- provide deep soil capacity along the western precinct boundary to strengthen the landscape screening presented to the Wollongong Botanic Garden, to minimise visual bulk exposure.

There have been no significant departures from the key urban design principles informing the arrangement of building envelopes that form the basis of the submitted master plan. Due to the orientation, siting and proportions of amended building envelopes, there remains a high degree of confidence that ADG solar access requirements can be met. However, Gyde and Homes NSW acknowledge that there will be a need to update detailed modelling to reaffirm solar access outcomes for the updated concept and address any other relevant matters that may arise post Gateway and prior to public exhibition. Any adjustments in relation to further massing investigations and solar testing are unlikely to be substantive, and are not expected to significantly affect the fundamental structure of the master plan or the quantum of floorspace intended to be delivered as a result of the proposed controls.

3.2.2 Opportunity sites

As mentioned above, the objective of the changes to the master plan and planning controls are seeking to create opportunity sites to initiate early development outcomes on land owned by NSW Government to expedite delivery of social and/or affordable housing. In order to do this and to be able to clearly implement a "key sites" planning control in the planning proposal, the following primary secondary and private opportunity sites have been developed as illustrated in Figure 4. The consolidation of secondary and private opportunities will be dependent upon private market negotiations and arrangements with landowners, as the intention of the planning proposal is that there is to be no compulsory acquisition of land.

- **Primary Opportunity Sites:** a group of contiguous sites that are wholly owned by NSW Government which are of a suitable configuration to accommodate achievable development

envelopes consistent with the scale and configuration of development proposed via the master plan and implemented through the key sites provisions.

- **Secondary Opportunity Sites:** a group of contiguous sites that are under majority NSW Government ownership which (through amalgamation via private negotiation) are of a suitable configuration to accommodate achievable development envelopes consistent with the scale and configuration of development proposed via the master plan and implemented through the key sites provisions.
- **Private Opportunity Sites:** a group of contiguous sites that are under majority private ownership, which (through amalgamation via private negotiation) are of a suitable configuration to accommodate achievable development envelopes consistent with the scale and configuration of development proposed via the master plan and implemented through the key sites provisions.



Figure 4 Opportunity sites

Each of the above were conceived in the updated master plan concept to ensure their potential to deliver outcomes that are consistent with key principles set out Section 16 of the Urban Design Report (Appendix 1 of the submitted/ notified Planning Proposal). Particular consideration was given to the capacity of the building envelopes to meet core design criteria and guidance of the ADG, especially building depth, building separation, cross ventilation, privacy, passive surveillance and solar access.

The arrangement of opportunity sites and their tenure informed the reconsidered key sites boundaries. Figure 5 which illustrates the key sites in relation to land tenure and Figure 6 which illustrates the key sites in relation to primary and secondary opportunity sites.

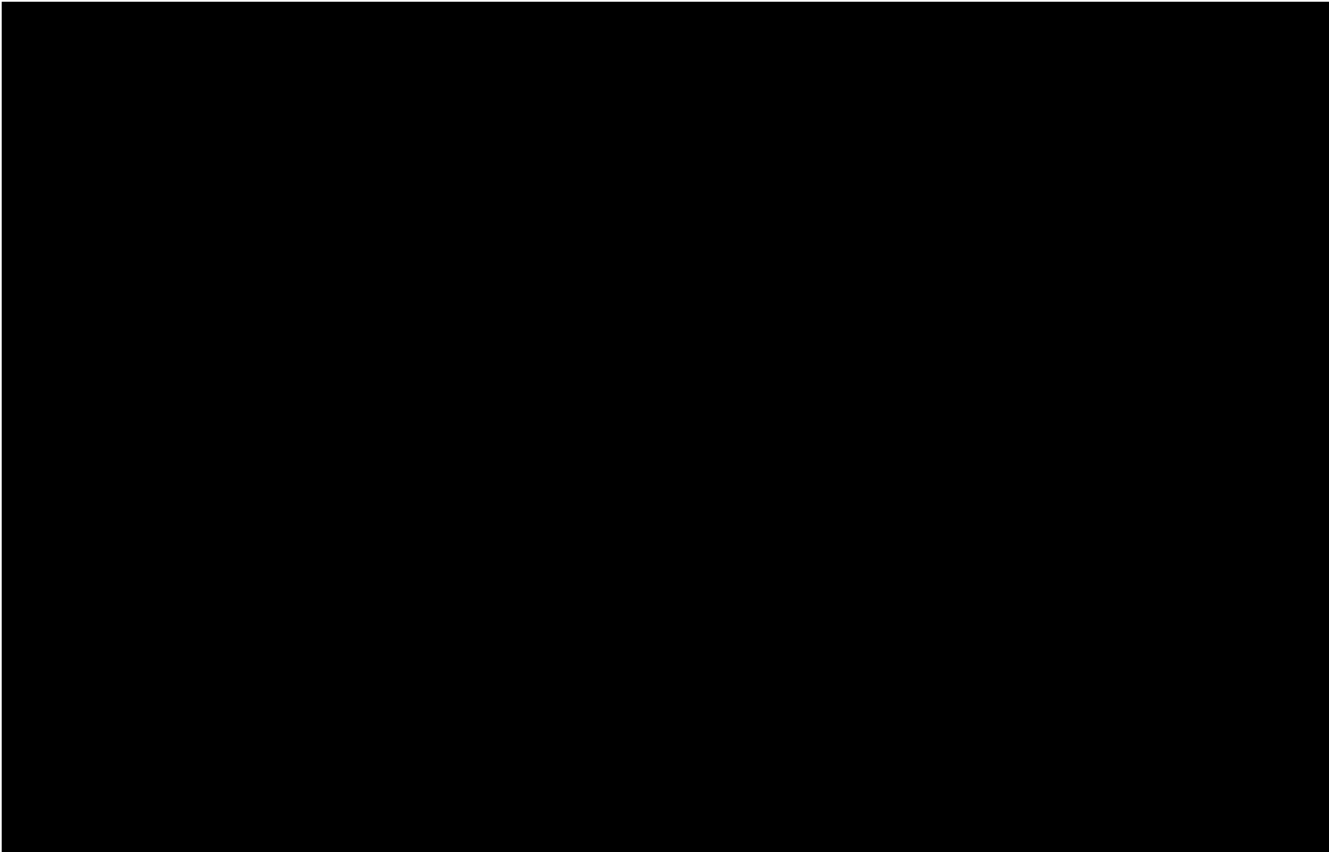


Figure 5 Key sites in relation to land tenure



Figure 6 Key sites in relation to primary, secondary and private opportunity sites

3.2.3 Updated potential development yields

As a result of the amendment to the master plan, updated development yields are provided in Table 1 and have been set out in relation to the updated key sites boundaries. The yields form the basis of FSR bonuses for key sites that achieve the desired amalgamation and place outcomes as relevant. The yields correspond to the key sites boundaries illustrated in Figure 5 and Figure 6.

Table 1 Estimated development yields for the Gwynneville Precinct

Key Site ID	Key Site Area (sqm) *	GFA (sqm)	FSR (:1)	Opportunity site category
10	1,366	1,821	1.4	Private
11	1,956	1,695	1.0	Private
12	3,757	4,267	1.2	Primary
13	2,563	3,450	1.4	Private
14	2,520	2,541	1.1	Private
15	1,921	2,657	1.4	Private
16	6,361	7,295	1.2	Secondary
17	2,530	3,549	1.4	Private
18	4,409	7,681	1.8	Secondary
19	1,295	1,499	1.2	Private
20	1,903	2,065	1.1	Private
21	2,517	2,253	1.0	Private
22	4,091	4,510	1.2	Primary
23	1,781	3,967	2.3	Secondary
24	3,218	3,709	1.2	Private
25	3,709	4,073	1.2	Secondary
26	1,814	2,430	1.4	Primary
27	2,573	3,130	1.3	Private
28	3,242	4,486	1.4	Secondary
29	1,801	3,445	2.0	Private
30	1,750	3,657	2.1	Private
31	2,548	4,495	1.8	Primary
32	1,909	2,341	1.3	Private
33	4,238	6,668	1.6	Primary
34	2,591	4,553	1.8	Private
35	2,575	3,238	1.3	Private
36	1,757	4,098	2.4	Primary
Total		99,574		

* Gyde has not had access to survey information. Key site area estimates are based on publicly available GIS data accessed from the NSW Spatial Database in October 2024.

Table 2 outlines the assumptions underpinning the yields analysis.

Table 2 Assumptions

Assumptions:	
Efficiency Ratio typical levels*	75%
Efficiency Ratio Ground floor*	60%
Average GFA/ Unit	80sqm

* An assumed floor space efficiency is applied across all floor levels however, this is subject to further testing and detailed design Efficiency on ground floor levels may need to be tailored to accommodate the basement ramp and waste collection facilities. Note that the efficiency ratio refers to the ratio applied to modelled building area to convert from Gross Building Area (GBA) to Gross Floor Area (GFA) allowing for non GFA generating elements including building articulation, balconies and common vertical circulation.

The development yield for primary and secondary opportunity sites is summarised in Table 3. It shows that the primary sites (wholly owned by the NSW Government) and secondary sites (majority owned by the NSW Government) have the capacity to provide for all of the 625 social and/or affordable housing dwellings. Homes NSW anticipates that these primary and secondary sites will be of particular interest to both Homes NSW and CHPs for the provision of social and/or affordable housing dwellings.

Table 3 Estimated development yields for Primary and Secondary Key sites

	Key Site Number	Total GFA (sqm)	Estimated number of dwellings **
Primary Key Sites (Wholly NSW Government owned)	12, 22, 26, 31,33, 36	26,467	331
Secondary Key Sites (Majority Owned by NSW Government)	18,16,24,25,23,28	27,502	335
Total Dwellings		53,969	665

** Estimate based on 80 sqm GFA per unit (average)

As per the above, once the intended social and affordable housing obligation of 625 dwellings is reached, it is proposed that a secondary public benefit mechanism via a section 7.11/ 7.12 contributions plan will be implemented to ensure that future development benefiting from the bonuses makes and equitable and proportionate contribution to the overall public benefit and intended for the precinct, including infrastructure upgrades.

3.2.4 Evolving the implementation plan

The updated master plan and implementation plan continue to support the primary aims of the original planning framework and the identification of the original key sites boundaries that formed the basis of the submitted planning proposal were to:

- ensure the delivery of a minimum 625 social and/or affordable housing units;
- facilitate amalgamation of the fragmented sites across the precinct through floor space ratio and building height incentives;

- establish feasible development sites that are conducive to delivering development patterns, scale of built form and place making outcomes intended by the master plan; and
- facilitate the equitable funding and the delivery of public benefits including social and affordable housing and public domain improvements.

The delineation of key sites boundaries in the submitted planning proposal sought to ensure that all sites made a fair and proportionate contribution to the public benefit and that no site was excessively burdened, particularly in relation to the provision of new public space. This was not able to be achieved under a scenario that delineated key sites boundaries to optimise the delivery of built form on identified primary and secondary opportunity sites. In addition, the incorporation of the central NSW Government-owned publicly accessible open space (see Section 3.1 above) into key sites required reconsideration for how the intended planning and delivery mechanisms proposed under the WLEP and supporting ADG could be interfaced to best effect.

The updated delivery framework prepared to deliver intended outcomes, respond to feedback received and is described as follows:

Outcome 1 – a precinct specific clause to ensure the delivery of social and affordable housing

The deliver of social and affordable housing will be delivered by establishing a precinct-specific clause under Part 7 of the WLEP requiring that:

- 50% of all new dwellings be provided as social and/or affordable housing; and
- a minimum provision of 625 dwellings is to be provided within the precinct.

Once the minimum 625 social and/or affordable dwellings have been met on a precinct wide level, it is intended that the obligation to deliver social and affordable housing will cease.

It is expected that the clause will need to be supported by a statutory register, which is maintained by Council to track and record the incremental delivery of social and affordable dwellings.

The intent of this clause is to:

- ensure the delivery of 625 social and affordable housing units across the Gwynneville precinct;
- provide flexibility to enable Homes NSW or others to develop above 50% social and/or affordable dwellings for particular development sites;
- provide flexibility for any site to exceed the delivery of 625 social and affordable housing units; and
- as they are provided, incrementally reduce the social and/or affordable dwellings obligation on other sites, including private opportunity sites, thereby supporting the feasibility of diverse market housing in due course.

It is recognised that private sites that are not driven by public funding to support the realisation of social and/or affordable housing are likely to remain in status quo until the 625 dwelling obligation is met on a precinct wide level. However, this is considered to be an improved circumstance given the approach reflected in the original planning proposal required all private sites to provide 50% social and/or affordable housing. The amended approach will incrementally de-burden privately-owned sites enabling their economic feasibility to facilitate delivery in later stages, albeit while still contributing via a Section 7.11/7.12 contributions plan.

Outcome 2 – Establish base zoning and development standards supported by incentives to facilitate amalgamation and public domain benefits

The previous approach to establishing the desired residential zoning and base height and FSR controls and with bonus incentives via the Key Sites mechanism to support amalgamation and public domain outcomes does not change as a result of these amendments. The total number of key sites has increased from 17 to 27 sites as shown in the plans compared in Figure 7 and Figure 8 below.



Figure 7 Original Proposed Keys Sites (KYS) Map - Site edged in red



Figure 8 Proposed New Keys Sites (KYS) Map - Site edged in red

Specifically, the following key controls will be reflected in mapping under the WLEP and any supporting provisions under Part 7 of the WLEP:

- Establish R4 High Density Residential and RE1 Public Recreation zones.
- Retain existing HOB of 9m and FSR of 0.5:1 as a baseline for development sites.
- Establish 27 Key Sites each with provisions for:
 - a minimum lot size; and
 - bonus height and FSR incentives (provided that minimum lot size is met).

The intent of this approach is to:

- incentivise consolidation of fragmented land to achieve feasible development parcels;
- realise development form and scale and public domain outcomes intended under the Master Plan; and
- activate the design excellence provisions under the WLEP 2009 to ensure high quality development outcomes.

Outcome 3 - Facilitate public ownership of RE1 Public Recreation zoned land and dedication to Council

Homes NSW will purchase privately owned sites identified as RE1 Public Recreation as they become available or via private market negotiation with landowners for the purposes of public open space and future dedication to Council as part of Sparring Reserve and the drainage corridor that runs through it.

Any RE1 zoned sites currently owned or purchased by Homes NSW via private market negotiations are intended to be dedicated to Council via a Voluntary Planning Agreement (VPA).

The intent of this approach is to facilitate public ownership of RE1 zoned land and dedication of land for the purposes of public open space. Note, as previously discussed, it remains Homes NSW's preference that all public open space be dedicated to Council. However, Homes NSW also recognises that alternative arrangements could also be agreed such as Homes NSW ownership of public space that is open for community use and enjoyment in perpetuity.



Figure 9 Land purchases by Homes NSW



Figure 10 Land dedications to Council by Homes NSW

Outcome 4 - Establish funding mechanisms to support the delivery of public benefits

Suitable mechanisms will be developed under the Developer Contributions Plan pursuant to Clause 7.11 and/or 7.12 of the Environmental Planning and Assessment Act (EP&A Act). The intent is to:

- Establish an equitable framework for funding and delivering precinct wide public benefits;
- Ensure that all sites contribute towards the overall intended public benefit;
- Provide funding mechanisms to support the delivery of public open space; and
- Support the delivery of required infrastructure upgrades including the embellishment of public space.

This plan will be developed with Wollongong City Council and Homes NSW based on the principles that will be established as part of a voluntary planning agreement.

3.2.5 Development Control Plan

At the workshop held on 29 October 2024, Council advised that it was seeking to establish a clause under the WLEP 2009 requiring that particular areas of the Wollongong LGA and Key Sites be developed in conjunction with a site-specific development control plan. The proposed amendment to the WLEP is expected to shortly be reported to Council and is likely to be in effect by the time the Gwynneville planning proposal is finalised.

Given the extent of change proposed by the Gwynneville planning proposal, a draft site-specific development control plan was submitted with the proposal in July 2024. Homes NSW recognises that the evolution of the plan and implementation framework, and the introduction of the above-mentioned clause (when effective), will necessitate a review of the draft site specific DCP.

Homes NSW and Gyde are committed to working with Council to ensure that the site specific DCP is structured to align with its expectation and provides a suitably robust and reliable framework to support the implementation of intended outcomes with the desired level of design excellence. Given that Council's proposed DCP clause has yet be adopted, and the ongoing planning proposal process that occurs post Gateway may involve further updates to the planning proposal and intended implementation framework, the most efficient time to update the site specific DCP is prior to public exhibition. This is when there is greater certainty of the planning outcome for the site and the legislation framework in which the proposal will need to respond.

4. Updated Planning Proposal

Outlined below are the updates to the intended outcomes and provisions as provided in Sections 4 and 5 of the planning proposal submitted to Council in July 2024. The following sections are intended to replace the equivalent sections in the submitted planning proposal as noted. These updates section are intended to form the basis of the planning proposal as is required to be reported to Council.

Feedback received from Council does not materially affect the objectives of the planning proposal (Section 3 of the submitted planning proposal), or the strategic and site-specific merits of the proposal (Part 3 of the PP). As such the justification in relation to these matters remains as submitted in July 2024 and suitably satisfies the that the criteria set out in the strategic and site-specific merit tests. Updates to mapping under Part 4 of the submitted proposal will be necessary and are provided in this submission.

Following the resolution of Council and, if supported, the issue of a Gateway determination by DPHI, it is intended that the planning proposal and supporting documents be updated post Gateway and prior to public exhibition. This will enable relevant matters raised by Council and any conditions of Gateway to be collectively addressed as the most efficient and effective means of updating the planning proposal.

4.1 Intended Outcomes (updates Part 1, Section 4 of the submitted planning proposal)

Homes NSW intend to facilitate delivery of a diverse range of housing typologies. This will include additional social and affordable housing, market housing products and seniors housing, as well as opportunities to develop build-to-rent, key worker housing and student accommodation.

The planning proposal intends to change the current zone of the land from R2 Low Density Residential to R4 High Density Residential, with new and expanded areas of RE1 Public Recreation. This will create the opportunity for low to mid-rise apartments in the precinct.

The base FSR of 0.5:1 and the height control of 9m that currently applies to the precinct is not proposed change. However, building height and FSR incentives will facilitate site amalgamation to create lots that are more capable of accommodating increased density and providing amenity. Height and FSR bonuses will be contingent upon achieving design excellence outcomes.

Homes NSW aims to create a high-amenity, walkable residential neighbourhood with an increased density and choice of affordable and diverse housing options that provide for a broad range of community needs and family types - including students, people on low incomes, people with disability and seniors.

New residential development will enable increased housing choices within in a well-connected location benefiting from frequent free shuttle bus services operating between University of Wollongong, North Wollongong railway station and a multitude of destinations including the city centre and hospital.

In particular, the following development outcomes are intended to occur as a result of this proposal:

- Provide a diverse range of well-designed and oriented social, community and diverse private housing in a low to mid-rise high-density format.
- Facilitate increased provision of public open space from the current 8,300sqm up to a maximum of 16,660sqm of public open space. This includes an extension to Spearing Reserve to provide improved opportunities for community building, social interaction and recreation, as well as a new centrally located community oriented social space and 'recreation area' that is publicly accessible in perpetuity.
- Mitigate flooding risk in the southern areas of the site through the expansion of public open space.

4.2 Summary of Intended Provisions (updates Part 2, Section 5 of the submitted planning proposal)

This planning proposal seeks to make the following amendments to the Wollongong Local Environmental Plan 2009.

The provisions have been designed to increase residential capacity to enable a range of social, community and diverse private housing options to be developed in the Gwynneville. The development standards have been intentionally designed to enable additional building height and floorspace to only be realised if particular land amalgamation and, where relevant, public domain outcomes have been met. The controls also trigger design excellence provisions set out under cl 7.18 of WLEP 2009 for key sites, which will provide council with greater means of ensuring high quality design outcomes at future development application stages.

It is noted that the intention of the planning proposal does not change any individual landowner's right to enjoy and develop land consistent with their existing planning controls.

Table 4 Summary of LEP Amendments

Control	Existing	Proposed
Zoning	R2 Low Density Residential	<p>R4 High Density Residential</p> <p>RE1 Public Recreation</p> <p>A portion of R2 Low Density Residential to remain unchanged in the south eastern corner of the site.</p> <p>Refer Figure 12</p>
Floor Space Ratio	D - 0.5:1	<p>D - 0.5:1 (No change)</p> <p>Areas proposed to be rezoned to RE1 Public Recreation to be assigned no FSR control.</p> <p>FSR bonuses will be provided for via local provisions under Part 7 of WLEP for identified key sites in order to facilitate intended land amalgamation outcomes.</p> <p>Refer Figure 14</p>
Height of Buildings	J - 9	<p>J - 9 (No change)</p> <p>Areas proposed to be rezoned to RE1 Public Recreation to be assigned no Height of Building control.</p> <p>Building height bonuses will be provided for via local provisions under Part 7 of WLEP for identified key sites in order to facilitate intended land amalgamation outcomes.</p> <p>Refer Figure 16</p>
Minimum Lot Size	F - 449	<p>The minimum lot size control is proposed to be removed as the minimum lot size controls under the proposed key site provision render the control redundant and unnecessary.</p> <p>The portion of remaining R2 Low Density Residential land will retain its existing minimum lot size control of 449sqm.</p> <p>Refer Figure 18</p>

Control	Existing	Proposed
Part 7 Local Provisions	No local provision pertaining to the Gwynneville Precinct	<p>Applicable to all identified key sites in the Gwynneville Precinct, insert a precinct specific clause under Part 7 of the WLEP 2009 to the following effect:</p> <ul style="list-style-type: none"> Minimum 50% of dwellings on all R4 High Density Residential zoned/ Key Sites to be provided as social and/or affordable housing. Minimum provision of social and/or affordable housing 625 dwellings is to be provided within the precinct. R4 High Density Residential zoned/ Key Sites may provide less than 50% social and/or affordable housing where provision of the 625 minimum has been met; Once the minimum 625 social and/or affordable dwellings have been met on a precinct wide level, it is intended that the obligation to deliver social and affordable housing will cease; Establish a statutory register to be maintained by Council which tracks and records the incremental delivery of social and affordable housing per site and reduces the required provision of such dwellings as they are provided across the precinct.
Part 7 Local Provisions	No local provision pertaining to identified "Key Sites" in Gwynneville	<p>For the 27 new sites identified on the Key Sites Map:</p> <ul style="list-style-type: none"> Establish new local provisions specific to the identified Key Sites as per Table 5. The intent is that building height and FSR bonuses may only be achieved if the minimum contiguous lot size has been met within the relevant key site boundary.
Key sites map	No sites in the Gwynneville Precinct are identified on the Key Sites Map	<p>Identify 27 key sites on the key sites map so as to establish the legislative basis to implement site specific provisions under Part 7 to facilitate building height and FSR incentives to support land amalgamation.</p> <p>The identification of 27 key sites will bring into effect the design excellence provisions set out under cl 7.18 of WLEP 2009 for those sites, requiring that the statutory clause be addressed and that all key sites would be subject to Council's established design excellence process.</p> <p>The portion of remaining R2 Low Density Residential land will not be subject to key sites provisions and is therefore not identified as a key site.</p> <p>Refer Figure 19</p>

Table 5 Key Sites Provisions

Key Site ID	Min Lot size (sqm)	Max FSR (x:1)	Max HOB (m)
10	1,300	1.4	15
11	1,900	1.0	13
12	3,700	1.2	15
13	2,500	1.4	15
14	2,450	1.1	13
15	1,850	1.4	18
16	6,250	1.2	15
17	2,450	1.4	18
18	4,350	1.8	22
19	1,250	1.2	15
20	1,850	1.1	15
21	2,450	1.0	15
22	3,950	1.2	15
23	1,700	2.3	22
24	3,150	1.2	18
25	3,650	1.2	18
26	1,750	1.4	15
27	2,500	1.3	18
28	3,200	1.4	18
29	1,750	2.0	22
30	1,700	2.1	22
31	2,500	1.8	18
32	1,850	1.3	15
33	4,150	1.6	18
34	2,500	1.8	15
35	2,500	1.3	18
36	1,700	2.4	22

4.3 Existing and proposed LEP Mapping (updates Part 4, Section 12 of the submitted planning proposal)

The proposal requires a number of mapping changes to the WLEP 2009 to implement the intended outcomes of this PP.

4.3.1 Land use zoning

The PP seeks to rezone the site from R2 Low Density Residential to R4 High Density Residential and RE1 Public Recreation. The south eastern portion of the site is to remain R2 Low Density Residential. It is noted that the central 'publicly accessible' open space intended to be delivered by Homes NSW on R4 High Density Residential land would be enabled through the permissible use of 'recreation areas'.

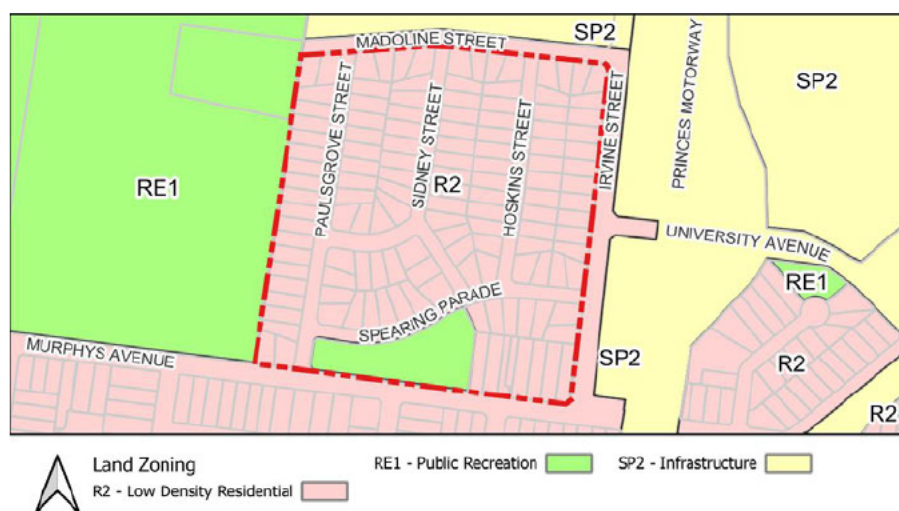


Figure 11 Existing Land Use Zoning (LZN) Map



Figure 12 Proposed Land Use Zoning (LZN) Map – Site edged in yellow

4.3.2 Floor Space Ratio

The PP seeks to maintain the 0.5:1 FSR limit across most of the site.

Lots intended to be zoned RE1 Public Recreation are proposed to have their FSR designation deleted so that no FSR control would apply to these sites, commensurate with their proposed RE1 zoning. Any FSR bonus is intended to be implemented via Key Sites provisions under Part 7 of the WLEP 2009.



Figure 13 Existing Floor Space Ratio (FSR) Map



Figure 14 Proposed Floor Space Ratio (FSR) Map - Site edged in red

4.3.3 Height of Buildings

The PP seeks to maintain the 9 metre height limit across most of the site.

Lots intended to be zoned RE1 Public Recreation are proposed to have their Height of Building designation deleted so that no Height of Building control would apply to these sites, commensurate with their proposed RE1 zoning. Any Height of Building bonus is intended to be implemented via Key Sites provisions under Part 7 of the WLEP 2009.



Figure 15 Existing Height of Buildings (HOB) Map



Figure 16 Proposed Height of Buildings (HOB) Map - Site edged in red

4.3.4 Minimum Lot Size

The minimum lot size is proposed to be deleted from proposed R4 and RE1 zoned sites as the control would be redundant following the implementation of minimum lot sizes in under Part 7 Key Sites provisions. The minimum lot size of 449sqm would remain in place for the ground of sites in the south eastern corner of the precinct as no change to zoning is proposed for these lots.



Figure 17 Existing Minimum Lot Size (LSZ) Map



Figure 18 Proposed Minimum Lot Size (LSZ) Map - Site edged in red

4.3.5 Key Sites Map

27 Key sites are proposed to be mapped on the key sites map. The purpose of these key sites is to:

- establish the geographical boundary and area of application for the proposed Part 7 Local Provisions.
- give effect to existing design excellence provisions outlined under CI 7.18 of the WLEP for key sites.



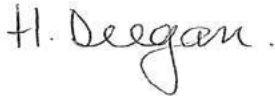
Figure 19 Proposed New Keys Sites (KYS) Map - Site edged in red

Gyde and Homes NSW trust that the information provided above provides Council with a suitable level of detail to inform the intended changes to the master plan in light of feedback received, and for the intended evolved master plan and implementation approach to be reported to Council.

We appreciate Council's efforts inputting into the proposal thus far and we look forward to maintaining ongoing communication and collaboration and we work together to refine outcomes.

If you have any queries about the above please feel free to contact the undersigned on 0412 900 060.

Yours sincerely

A handwritten signature in black ink that reads "H. Deegan". The signature is written in a cursive, flowing style.

Helen Deegan
Executive Director
helend@gyde.com.au
0412 900 060