

Planning Proposal

47-55 Bunnerong Road, Kingsford

Prepared on behalf of Homes NSW October 15, 2024

FPDplanning



Document control

Authors

Reviewed by	Michael File, Director	michael@fpdplanning.com
Prepared by	Katrina Burley, Associate	katrina.burley@fpdplanning.com

Project summary

Prepared on behalf of	NSW Land and Housing Corporation (operating as Homes NSW)
Land to be developed	47-55 Bunnerong Road, Kingsford
Legal description	Lot 1 DP 433534
Project description	Planning Proposal to amend height and FSR controls to facilitate the renewal of existing social housing on site to deliver increased social and affordable housing at 47-55 Bunnerong Road, Kingsford.

Contents

Doc	Document controlii		
Exe	Executive Summaryvii		
1	Background	13	
1.1	The Planning Proposal	13	
1.2	Kingsford South Housing Investigation Area – Deferred Site	13	
2	Site analysis and context	15	
2.1	Site description	15	
2.2	Surrounding land use	15	
2.3	Local context	17	
3	Strategic planning context	19	
3.1	Greater Sydney Region Plan	19	
3.2	Eastern City District Plan	19	
3.3	Future Transport 2056	23	
3.4	Future Directions for Social Housing	23	
3.5	Better Placed	24	
3.6	Greener Places and Draft Greener Places Design Guide	24	
3.7	Randwick Local Strategic Planning Statement	25	
3.8	Randwick Local Housing Strategy	28	
4	Statutory context	31	
4.1	Randwick local environment plan 2012	31	
4.1.1	1 Land use zoning	31	
4.1.2	2 Building height	32	
4.1.3	3 Floor space ratio	33	
4.1.4	4 Heritage	33	
4.2	Housing Investigation Areas Development Control Plan	34	
5	The proposal	36	
5.1	Urban design and reference scheme	36	
5.2	Proposed LEP amendments	38	
5.3	Proposed DCP amendments	38	
6	Objectives and intended outcomes	39	
7	Explanation of provisions	40	
8	Mapping	41	

9.	Justification of strategic merit	
9.1	The need for the Planning Proposal	42
9.2	Relationship to strategic planning framework	42
9.3	Environmental, social and economic impacts	47
9.3.1	Overshadowing	47
9.3.2	Visual impact	47
9.3.3	Residential amenity	
9.3.4	Arboricultural impact	
9.3.5	Landscaping and tree canopy	
9.3.6	European heritage	
9.3.7	Traffic and transport	53
9.3.8	Ecologically sustainable development	54
9.3.9	Flooding and stormwater	54
9.3.1	0 Acoustic impacts	55
9.3.1	1 Electromagnetic impacts and fire safety	55
9.3.1	2 Economic impact	56
9.3.1	3 Social impact	56
9.3.1	4 Social infrastructure	56
10	Consultation	58
10.1	Randwick Council consultation	58
10.2	State and Commonwealth agency consultation	62
11 I	Project timeline	63
12	Conclusion	64

Table 1: Consideration of Eastern City District Plan	20
Table 2: Open Space for Recreation Guide criteria	25
Table 3: Consideration of Local Strategic Planning Statement	26
Table 4 Consideration of Local Housing Strategy	29
Table 5 LEP provisions	31
Table 6: Analysis against State Planning Policies	43
Table 7: Analysis against Ministerial Directions	43
Table 8 Tree proposed for retention and removal (Source: Bluegum)	51
Table 9 Pre-lodgement comments and response	58
Table 10: Anticipated project timeline	

Figure 1: Subject site outlined in orange (Source: SixMaps)	15
Figure 2 Surrounding land uses	16
Figure 3: Local context (Source: PTW Architects)	17
Figure 4 Transport context (Source: PTW Architects)	18
Figure 5 Open space context (Source: PTW Architects)	18
Figure 6 Eastern City District Plan	20
Figure 7 LSPS Structure Plan	26
Figure 8 Housing growth areas in LHS	29
Figure 9: Land use zoning map (Source: eplanning spatial viewer))	32
Figure 10: Height of buildings map (Source: eplanning spatial viewer)	32
Figure 11: FSR map (Source: eplanning spatial viewer)	33
Figure 12: Heritage map (Source: eplanning spatial viewer)	33
Figure 13 Housing Investigation Areas	34
Figure 14 Deferred Site (shown in orange)	34
Figure 15 Reference scheme indicative layout (Source: PTW)	36
Figure 16 Proposed heights and setbacks (Source: PTW)	37
Figure 17 Indicative landscape plan (Source: PTW)	38
Figure 19: Proposed Height of Buildings map (Source: PTW)	41
Figure 20: Proposed FSR map (Source: PTW)	41
Figure 21 Existing view looking north along Bunnerong Road (Source: PTW)	48
Figure 22 Proposed view looking north along Bunnerong Road (Source: PTW)	48
Figure 23 Existing view looking west along Anderson Street (Source: PTW)	49
Figure 24 Proposed view looking west along Anderson Street (Source: PTW)	49
Figure 25 Tree location and value plan (Source: Bluegum)	51

This page is left intentionally blank

Executive Summary

This Planning Proposal has been prepared by FPD Planning on behalf of NSW Land and Housing Corporation (operating as Homes NSW)).

The Planning Proposal seeks an amendment to the Randwick Local Environmental Plan (LEP) 2012 to amend height and Floor Space Ratio (FSR) controls to facilitate the renewal of 47-55 Bunnerong Road, Kingsford - a large, highly accessible site to deliver increased housing supply and the renewal of social housing on the site. The Planning Proposal will deliver up to 50% of dwellings as social and affordable housing on the site.

The Planning Proposal seeks to facilitate renewed social housing and increased housing supply in a highly accessible location in the Kingsford South Housing Investigation Area – an area identified for significant renewal and housing growth.

The proposal will meet the increasing demand for new housing in the local area and facilitate the renewal of social housing on site.

The site

The Planning Proposal relates to land at 47-55 Bunnerong Road, Kingsford (the site). The site is 6,052sqm and bound by Bunnerong Road to west, Anderson Street to the south, Energy Australia owned open space and substation to the north-east and Jacques Street to the north.

The site currently contains 8, 3-storey buildings containing 60 dwellings, owned by Homes NSW and constructed in the late 1940's.

The site is currently zoned R3 Medium Density Residential under the *Randwick Local Environmental Plan 2012* with a maximum height of 12m and a maximum floor space ratio of 0.75:1.

The site is located in Kingsford in inner south-east Sydney, within walking distance of public transport including high frequency bus services on Bunnerong Road and light rail services at Kingsford Junior Light Rail stop, and services and facilities including Kingsford town centre, open space, and local schools.

Prioritising rezonings that deliver social and affordable housing

In May 2024, the Department of Planning, Housing and Infrastructure (DPHI) introduced a new accelerated pathway for rezoning proposals where DPHI will lead the assessment of proposals made by the state's housing agencies within Homes NSW and Landcom for sites that deliver an increase in social and affordable housing.

The program provides an accelerated and streamlined rezoning process for the state's housing agencies to deliver a strong pipeline of social and affordable homes and aims to:

- accelerate the delivery of more social and affordable homes in NSW
- ease pressure on social and affordable housing waiting lists in NSW
- increase investor confidence in social and affordable housing projects in NSW.

The Planning Proposal meets the eligibility criteria of the accelerated rezoning pathway as the application is;

- made behalf of Homes NSW,
- a Planning Proposal that is not currently in the planning system,



- a Planning Proposal that is aligned to state and national housing priorities, being the delivery of new social and affordable housing
- able to be lodged within 60 working days after feedback has been received on the scoping proposal; and
- compliant with relevant planning legislation, policies, and Ministerial directions.

The Planning Proposal is consistent with aims and objectives of the accelerated rezoning pathway, satisfies the eligibility criteria, and is strategically important to the delivery of increased social and affordable housing in a highly accessible location.

Background

The site is within the Kingsford South Housing Investigation Area (HIA) – an identified housing growth area in the Randwick Local Government Area.

The site was previously included as part of Randwick's Comprehensive Planning Proposal which included amendments to the planning controls to increase height and floorspace controls for the identified HIA's.

At that time, the proposed controls for the site included an increase in height from 12m to 16.5m (approximately 5 storeys) and increase the FSR from 0.75:1 to 1.6:1. No change to the R3 Medium Density Residential zone was proposed for the site.

At the August 2022 Council meeting it was agreed to defer the rezoning of 47-55 Bunnerong Road to allow NSW LAHC to prepare a site-specific Planning Proposal for the site. The site-specific Planning Proposal for the site was agreed to allow NSW LAHC to investigate the potential for heights of 8 storeys and an FSR of 3:1 to facilitate redevelopment and renewal of the site.

Council identified the following key issues to be considered in a future Planning Proposal for the site:

- The need for a master plan for the site to justify that an increase in height above Councils proposed 5 storeys will be suitable in the site context and local character, and not result in unacceptable impacts to adjoining properties, and
- That any increase in height above the proposed 5 storeys, proposed as part of a NSW LAHC led Planning Proposal would need to demonstrate a significant addition of social and affordable housing dwellings as part of the redevelopment.

Council also noted that any future redevelopment of 47-55 Bunnerong Road:

- facilitates the retention of the existing mature canopy trees.
- improves the integration of the site with its surroundings.
- considers the interface with the Daceyville Heritage Character Area (located in the Bayside Council LGA).

These matters have been addressed in this Planning Proposal.

The amendments to the *Randwick Local Environmental Plan 2012* were finalised in September 2023 and provide for heights up to 16.5m and a maximum FSR of 1.6:1 for surrounding land within the Kingsford South HIA.

The proposal

The Planning Proposal provides the opportunity for increased housing supply and the renewal of a large, highly accessible site in an identified housing growth area.



The proposal provides for approximately 185 new dwellings in a mixed tenure configuration which will include a significant percentage of social housing.

All existing dwellings will be replaced with new more sustainable fit for purpose social dwellings and additional new social dwellings will be provided on the site The proposal will ensure no net loss of social housing on site. The proposal seeks to maximise the proportion of social and affordable housing on site, with up to 50% of dwellings to be provided as social and affordable housing.

The proposal provides a built-form response that is appropriate for its context and consistent with existing and planned densities in the local area. Renewal of the site provides the opportunity to provide increased housing on a key site in the Kingsford South HIA, while providing an important transition between the high density Kingsford town centre, planned mid-rise areas in the surrounding Kingsford South HIA, and established lower scale residential areas to the south and west

A reference design scheme has been prepared by PTW Architects to demonstrate the proposed planning framework can deliver a high-quality outcome on the site. The indicative concept scheme would facilitate residential development within a highly articulated and varied built form with heights ranging from 5 storeys to 8storeys, providing for approximately 185 dwellings.

A Landscape Concept Plan has been developed by Land and Form Studios. The proposal will provide a significant amount of deep soil and tree canopy, will retain high value trees within the Bunnerong Road setback and street trees on Anderson Street, and provide for increased tree plantings and landscaping to enhance the site and surrounding streets.

Provision for car parking has been accommodated within a basement in accordance with the rates in Randwick HIA DCP. No vehicular access is proposed from Bunnerong Road. An indicative basement access location is proposed on Anderson Street.

Proposed Amendments to the Randwick Local Environmental Plan 2012

To facilitate development consistent with the reference design scheme, changes are proposed to the Randwick Local Environmental Plan 2012 (Randwick LEP). The following amendments to the Randwick LEP are proposed:

- Increasing the maximum height of buildings from 12m to 28m, and
- Increasing the maximum floor space ratio from 0:75 to 2.7:1

No change is proposed to the R3 Medium Density Residential zone, which permits residential flat buildings with consent.

Proposed Amendments to the Randwick Development Control Plan 2012

An amendment to Randwick DCP 2012 (DCP) has been prepared to support the Planning Proposal.

Council has prepared a DCP for the HIA's with detailed controls to guide future development.

The site is located within the Kingsford South HIA but is deferred from the DCP; however, the provisions in the DCP have been used as guidance in the preparation of reference scheme and draft site-specific DCP controls for the site.

An amendment to the Randwick DCP has been prepared including:

• Indicative layout and built form

- Setbacks and height in storeys
- Guidance on building design
- Access arrangements
- Landscaping
- Tree retention and tree canopy

The Draft DCP amendment is provided at Appendix B.

Consideration of key issues

The Planning Proposal is supported by a series of technical studies to enable consideration of key issues associated with the proposal, as outlined below.

- Draft Development Control Plan amendment (**Appendix B**)
- Urban Design Report (**Appendix C**)
- Landscape Concept Report (Appendix D)
- Arboricultural Impact Assessment (**Appendix E**)
- Heritage Impact Statement (**Appendix F**)
- Traffic and Transport Assessment (Appendix G)
- Ecological Sustainable Development Report (Appendix H)
- Acoustic Assessment (**Appendix I**)
- Flooding and Stormwater Assessment (**Appendix J**)
- Electromatic Magnetic Field Assessment (Appendix K)
- Fire Engineering Report (Appendix L)
- Social Impact Assessment (Appendix M)
- Randwick Council Pre-lodgement letter (Appendix N)

These studies conclude that the proposal would not result in any significant impacts on the surrounding area and that all issues associated with the proposal can be appropriately managed.

Consultation

The Planning Proposal has been informed by preliminary stakeholder and community engagement. This included correspondence and meetings with identified key community groups and stakeholders.

Consultation has also been undertaken with Randwick Council, including a pre-lodgement meeting held 11 October 2023. A copy of Council's pre-lodgement advice is provided at Appendix N.

Randwick Council provided a letter dated 23 November 2023 outlining matters for consideration in the Planning Proposal, and studies required to support the Planning Proposal.

The matters raised by Council have been considered in this Planning Proposal and are addressed at Section 10.

Strategic merit

The Planning Proposal has strategic merit.

The site is within the Kingsford South Housing Investigation Area (HIA) – an identified housing growth area in the Randwick Local Housing Strategy.

The Planning Proposal is consistent with the local housing priorities identified in the Randwick Local Housing Strategy, as it will:



- Concentrate growth in accessible locations in and around centres and within walking distance of shops, employment, public transport, facilities and services.
- Concentrate growth in and around planned renewal or infrastructure projects, to better reflect built environment changes (e.g. Randwick Heath and Education Precinct).
- Focus growth around areas of high amenity and recreational value.
- Recognise and preserve our special character areas and values.
- Increase affordable rental housing and social housing.

The site is of strategic importance as it supports the renewal of a large, accessible site to deliver increased housing supply, more diverse housing, and improved social housing outcomes.

The Planning Proposal is consistent with the strategic objectives and actions in Future Directions for Social Housing, as it will deliver increased social housing and improved social housing outcomes, in line with NSW Government policy.

The Planning Proposal is consistent with the *Greater Sydney Region Plan*, *Eastern City District Plan*, and *Randwick Local Strategic Planning Statement*, which all identify the need to deliver increased and more affordable housing options. The Planning Proposal's strategic merit is further demonstrated in Section 7 'Justification' of this report.

Site specific merit

The Planning Proposal demonstrates site-specific merit as summarised below:

- The reference scheme demonstrates that the proposed planning controls and built form outcomes will deliver high amenity apartments and communal spaces, that exceed the requirements of the Apartment Design Guideline (ADG).
- The proposal has sought to respond to the surrounding built form and landscape character including through an appropriate built form relationship that transitions from the high-density Kingsford town centre to lower scale residential uses to the south and east of the site.
- The proposal is appropriate for its setting, providing an appropriate built form interface to the Daceyville heritage conservation area and low density residential properties on Anderson Street.
- The Landscape Concept Plan demonstrates can achieve generous deep soil and tree canopy cover and provides for retention of significant trees where possible and increased tree plantings and landscaped setbacks.
- The proposal minimises amenity impacts to neighbouring properties and maintains appropriate levels of solar access to neighbouring properties.
- The site is well located in close proximity to public transport, being less than a 5-minute walk to the Kingsford light rail and is accessible to a range of existing services within the Kingsford town centre and Randwick strategic centre.
- The site has excellent access to social infrastructure including local primary and high schools, higher education facilities, health facilities and open space.
- The Transport and Traffic Report prepared by Stantec demonstrates that the proposal will has acceptable traffic and transport impacts.
- Noise impacts associated with Bunnerong Road and Sydney Airport can be appropriately mitigated as part of future development as demonstrated in the Acoustic Assessment.
- The Electromatic Field (EMF) Impact Assessment confirms EMF readings are safe and below reference levels across the whole site.
- The site is not subject to the 1% AEP flood but is affected in the PMF. The proposal
 accommodates floor levels above the PMF flood event and allows for the safe evacuation of
 residents from the site.



• The proposal does not result in any significant view impacts or visual impacts from key public spaces.

Conclusion

The Planning Proposal seeks to facilitate renewal of the site to increase housing supply and renew social housing on the site.

The Planning Proposal has strategic merit as it supports State and local government objectives regarding increasing the supply of housing, including social housing, in accessible locations.

The proposal provides an appropriate built form response and will facilitate the renewal of the site to deliver more and better housing, providing significant benefits for the local area and wider community.

1 Background

1.1 The Planning Proposal

The Planning Proposal is being progressed by NSW Land and Housing Corporation (operating as Homes NSW) to facilitate renewal of a site at 47-55 Bunnerong Road (the site) to deliver increased housing supply, renewed social housing, and improved housing outcomes on the site.

The Planning Proposal seeks to facilitate increased housing supply and support the renewal of existing social housing in a highly accessible location, in an area identified for housing growth.

The proposed reference scheme and planning controls seek to increase capacity on the site, consistent with the existing and planned built form character and densities, including Kingsford town centre to the north.

The proposal will meet the increasing demand for new housing in a highly accessible location and facilitate the renewal of social housing on site. The proposal will provide for approximately 185 dwellings with a mix of apartment types and tenures, with up to 50% social and affordable housing. The proposal will meet the significant demand for housing, including social and affordable housing, in the local area.

1.2 Kingsford South Housing Investigation Area – Deferred Site

The site is within the Kingsford South Housing Investigation Area (HIA) – an identified housing growth area in the Randwick Local Housing Strategy.

The site was previously included as part of Randwick's Comprehensive Planning Proposal which included amendments to the planning controls to increase height and floorspace controls for the HIA's.

At that time, the proposed controls for the site included an increase in height from 12m to 16.5m (approximately 5 storeys) and increase the FSR from 0.75:1 to 1.6:1. No change to the R3 Medium Density Residential zone was proposed for the site.

At the August 2022 Council meeting it was agreed to defer the rezoning of 47-55 Bunnerong Road to allow NSW LAHC to prepare a site-specific Planning Proposal for the site. The site-specific Planning Proposal for the site was agreed to allow NSW LAHC to investigate the potential for heights of 8 storeys and an FSR of 3:1 to facilitate redevelopment and renewal of the site.

Council identified the following key issues to be considered in a Planning Proposal for the site:

- The need for a master plan for the site to justify that an increase in height above Councils proposed 5 storeys will be suitable in the site context and local character, and not result in unacceptable impacts to adjoining properties, and
- That any increase in height above the proposed 5 storeys, proposed as part of a NSW LAHC led Planning Proposal would need to demonstrate a significant addition of social and affordable housing dwellings as part of the redevelopment.

Council also noted that any future redevelopment of 47-55 Bunnerong Road:

- facilitates the retention of the existing mature canopy trees.
- improves the integration of the site with its surroundings.
- considers the interface with the Daceyville Heritage Character Area (located in the Bayside Council LGA).



These matters have been addressed in this Planning Proposal.

The amendments to the *Randwick Local Environmental Plan 2012* were finalised in September 2023.

2 Site analysis and context

2.1 Site description

The site is approximately 6,052 sqm and has two street frontages being Bunnerong Road to the west and Anderson Street to the south. The site is legally described as Lot 1 DP 433534.

The site is approximately 350m from Junior Kingsford Light Rail Stop and Kingsford town centre.



Figure 1: Subject site outlined in orange (Source: SixMaps)

2.2 Surrounding land use

Immediately north and east of the site is the Energy Australia electricity substation and associated open space on Jacques Street zoned SP2 Infrastructure.

Surrounding the site to the north and east is the Kingsford South Housing Investigation Area (HIA) which currently contains lower scale residential development but has been recently unzoned to allow for mid-rise residential development of 5-storeys, with heights increasing toward the Kingsford town centre (refer to Figure 2).

The Kingsford town centre is located to the north of site, providing a range of services and facilities, and currently undergoing significant development and renewal, with new buildings up to 15-17 storeys in the town centre.

The Kingsford Juniors Light Rail stop is located appropriately 350m from the site, and the 1hectare Daceyville Gardens open space is located approximately 100m to the north of the site on the opposite side of Bunnerong Road.



To the west of the site, on the opposite side of Bunnerong Road, is the Daceyville heritage conservation area, located in the Bayside Local Government Area.

To the south, the site is bound by Anderson Street providing a mix of established residential development, with a range of housing types and heights ranging from one to three storeys.

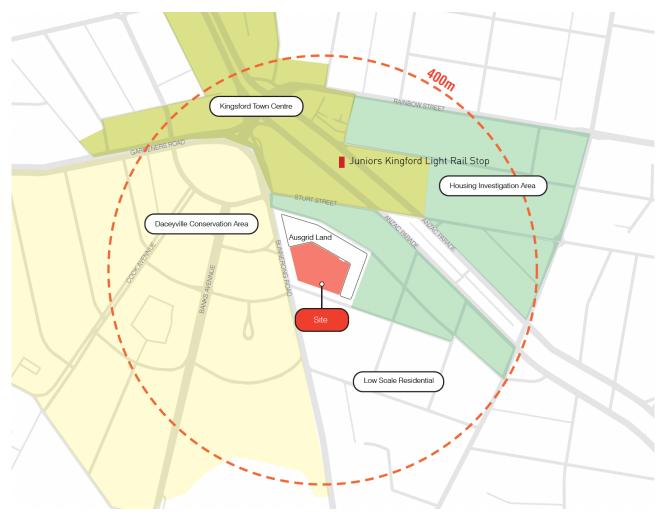


Figure 2 Surrounding land uses



2.3 Local context

The site is located in Kingsford in the eastern suburbs within major health, sport and education facilities within close proximity to the site. It has excellent access to transport, services and facilities which support its renewal.

The site is accessible to public transport being within 350m of high-frequency public transport, including the Kingsford Light Rail Station and bus services on Bunnerong Road right outside the site, providing access to the Sydney CBD and the heavy rail network at Central Station and ferry services at Circular Quay.

The Kingsford town centre is approximately 350m of the site and provides a diverse range of local and retail services.

The University of New South Wales is within 15 minutes walking distance from the site. The site is within 500m of a number of schools including Daceyville Public school, St. Michael's Catholic School and Church, and St Spyridon College.

The site has easy access to surrounding open green spaces on its east such as Darcey Gardens within 100m walking distance, Rowland Park within 500m, and Paine Reserve within 850m providing a range of passive and active recreation facilities.

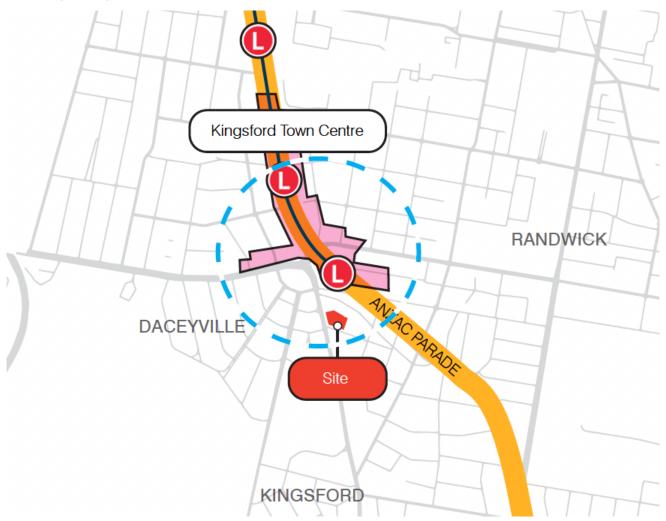


Figure 3: Local context (Source: PTW Architects)

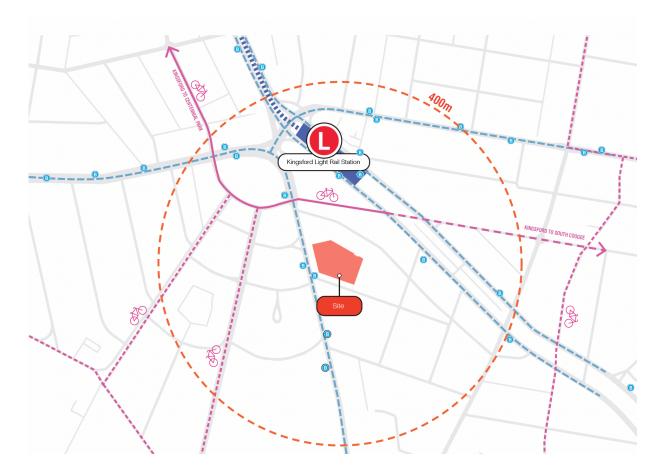


Figure 4 Transport context (Source: PTW Architects)

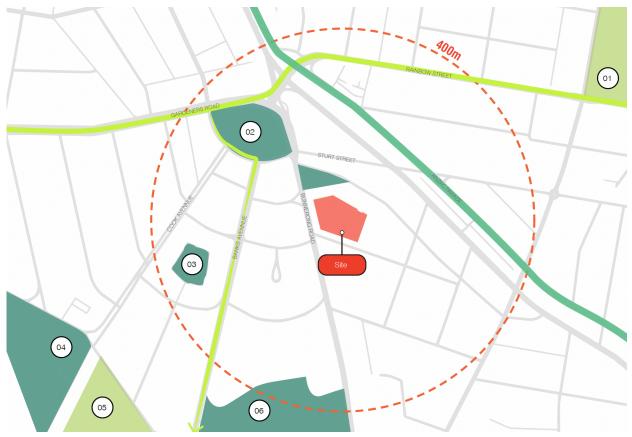


Figure 5 Open space context (Source: PTW Architects)

3 Strategic planning context

3.1 Greater Sydney Region Plan

The Greater Sydney Region Plan, A Metropolis of Three Cities released by the Greater Sydney Commission in 2018, establishes a vision of three cities where most residents live within 30 minutes of jobs, education and health facilities.

It establishes directions, objectives and actions to achieve the 40-year vision, focused on infrastructure and collaboration, liveability, productivity and sustainability. The Greater Sydney Region 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.

A number of the objectives of the plan are relevant to the Planning Proposal, in particular:

- Objective 1: Infrastructure supports the three cities
- 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

The aspirations of the Plan are further considered and expanded in the Eastern City District Plan which is discussed in Section 3.2 below.

3.2 Eastern City District Plan

The Eastern City District Plan supports the Greater Sydney Region Plan. The District Plan seeks to manage growth in the context of economic, social and environmental matters and contains planning priorities and actions for implementing the Greater Sydney Region Plan at the district level.

The Eastern City District Plan identifies Randwick as a strategic centre, supporting the Harbour CBD and Eastern Economic Corridor stretching from Macquarie Park to Green Square-Mascot and Randwick. The District Plan also identifies the Randwick Health and Education Precinct, clustered around established health and education uses including the University of NSW and Prince of Wales Hospital.

Renewal of the site will support the growth of the Randwick Health and Education Precinct and provide increased housing within close proximity to jobs and services with the Randwick Strategic Centre.

The Plan includes an action to facilitate an Innovation Corridor that provides access to affordable, diverse and multipurpose housing (Action 26), the need for housing opportunities for students and workers within 30 minutes of the Randwick Health and Education Precinct (Action 27) and Action 36 outlines the need to plan for urban development, new centres, better places and employment uses that are integrated with, and optimise opportunities of, the CBD and South East Light Rail.

The renewal of the site will increase housing supply and improve social housing in a highly accessible and well-serviced location. This is consistent with the District Plan which highlights the need for new housing to be provided through urban renewal close to infrastructure and centres.

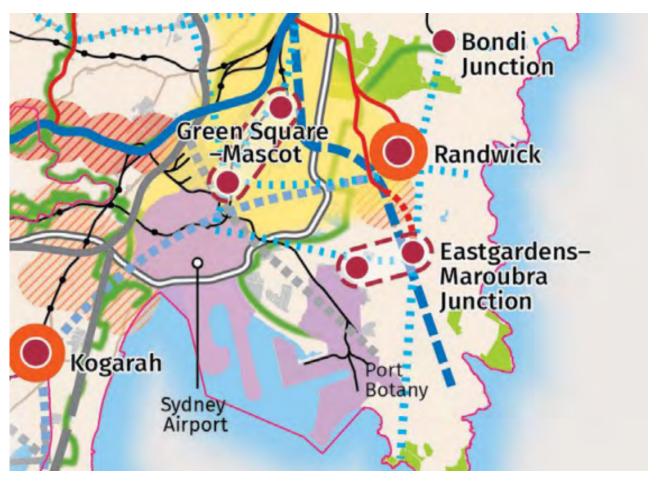


Figure 6 Eastern City District Plan

The proposal aligns with the relevant actions in the District Plan, as set in Table 1 below.

Table 1: Consideration of Eastern City District Plan

Action	Consideration	
E1: Planning for a city supported by infrastructure		
Action 3: Align forecast growth with infrastructure	The proposal seeks to align growth with existing infrastructure including the CBD and South East Light Rail line. The site is very well serviced by buses along Bunnerong Road.	
Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities		
Action 10: Deliver healthy, safe and inclusive places for people of all ages and abilities that support socially connected communities by: Providing walkable places at the human scale for active street life Prioritise opportunities for people to walk, cycle and use public transport, Co-locating school, health, aged care and sporting and cultural facilities Promote local access to health fresh food and supporting local fresh food production.	The proposal will support a healthy and connected community through the renewal of the site. The site is within easy walking distance to public transport, open space, services, and facilities encouraging people to walk, cycle and sue public transport.	



Planning Priority E5: Providing housing supply, choice and affordability with access to jobs, services and public transport

Action 16: Prepare local or district housing strategies that address the following: the delivery of five-year housing supply targets (2016-2021) for each local government area the delivery of 6-10 year (when agreed) housing supply targets for each local government area capacity to contribute to the longer term 20- year strategic housing target for the District the housing strategy requirements outlined in Objective 10 of A Matropolis of Three Cities	The Proposal will contribute to the delivery of the housing targets with housing to be delivered within the 6–10-year timeframe. dwellings. It will also renew existing social housing and deliver additional new social housing.
Objective 10 of A Metropolis of Three Cities.	

Planning Priority E6: Creating and renewing great places and local centres and respecting the District's heritage

Action 18: Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by: prioritising a people-friendly public realm and open spaces as a central organising design principle recognising and balancing the dual function of streets as places for people and movement providing fine grain urban form, diverse land use mix, high amenity and walkability, in and within a 10-minute walk of centres integrating social infrastructure to support social connections and provide a community hub recognising and celebrating the character of a place and its people.	The proposal provides a place based approach to renewal which seeks to respond to the existing and planned built form and landscape character by providing for appropriate height transition, significant greening of the site, and retention of significant street trees. The proposal will provide increased housing within a 10-minute walk of centres and jobs. The proposal will also enhance the built form address to Bunnerong Road and Anderson Street and provide for improved residential activation and community integration with the opportunity for private open space, landscaping and residential entries on street frontages.
Action 20: Identify, conserve and enhance environmental heritage by: engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place applying adaptive re-use and interpreting heritage to foster distinctive local places managing and monitoring the cumulative impact of development on the heritage values and character of places.	The proposal has responded to the surrounding heritage context with a built form outcome and landscaping concept which has carefully considered the sites relationship to the Daceyville heritage conservation area.
Planning Priority E7: Growing a more stronger an	d more competitive Harbour CBD
Action 24: Strengthen the international competitiveness of the Harbour CBD and grow its	The proposal supports this action by providing residential development close to the Randwick

Action 24: Strengthen the international competitiveness of the Harbour CBD and grow its vibrancy by: further growing an internationally competitive commercial sector to support an innovation economy providing residential development without compromising commercial development providing a wide range of cultural, entertainment, arts and leisure activities	The proposal supports this action by providing residential development close to the Randwick strategic centre in the Harbour CBD, within an existing residential area identified for housing growth.
entertainment, arts and leisure activities	



providing a diverse and vibrant night-time economy, in a way that responds to potential negative impacts.

Planning Priority E8: Growing and investing in the health and education precincts and the Innovation Corridor

 Action 26: Facilitate an Innovation Corridor that: provides access to a sufficient supply of affordable and scalable spaces promotes co-location and increased business-to-business interaction connects with events spaces delivers a high amenity, highly walkable and safe corridor has access to affordable, diverse and multipurpose housing options supports a strong night time economy. 	The proposal will support the innovation corridor through providing housing, including social housing, within close proximity of the Randwick strategic centre.
 Action 27: Facilitate health and education precincts that create the conditions for the continued colocation of health and education facilities, and services to support the precinct and growth of the precincts have high levels of accessibility attract associated businesses, industries and commercialisation of research facilitate housing opportunities for students and workers within 30 minutes of the precinct. 	The proposal will support the Randwick Health and Education Precinct by providing housing, including opportunities for social housing and key worker housing, within close proximity of the precinct.

Planning Priority E10: Delivering integrated land use and transport planning and a 30-minute city

Action 36: Plan for urban development, new centres, better places and employment uses that are integrated with, and optimise opportunities of, the public value and use of Sydney Metro City & South West, CBD and South East Light Rail, and Westconnex as well as other city shaping projects.	The proposal will facilitate urban development and increased housing supply within a 5-minute walking catchment of the Kingsford Light Rail stop on the CBD and South East Light Rail.
---	---

Planning Priority E17: Increasing urban tree canopy cover and delivering green grid connections

Action 69: Expand urban tree canopy in the public realm.	The proposal seeks to retain significant trees along Bunnerong Road and Anderson Street and increase tree planting across the site.
	The proposal demonstrates that the site would be able to deliver 25% canopy cover which is consistent with the target in Greener Places Design Guide and the Randwick HIA DCP.
Planning Priority S20: Adapting to the impacts of urban and natural hazards and climate change	

Action 79: Avoid locating new urban development in	The site is not located on land subject to the 1%
areas exposed to natural and urban hazards and	AEP flood event; however, a portion of the site
consider options to limit the intensification of	along Bunnerong Road frontage is affected by the
development in existing urban areas most exposed	PMF.
to hazards.	



	The proposal has been designed to ensure that floor levels in this location are above the PMF level and that basement access is provided from Anderson Street, as outlined in Section X.
Action 80: Mitigate the urban heat island effect and reduce vulnerability to extreme heat	The proposal seeks to minimise the urban heat island effect by providing a high level of tree canopy cover and landscaping across the site.

3.3 Future Transport 2056

Future Transport 2056 sets the 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.

Under these six outcomes, Future Transport 2056 identifies Greater Sydney Transport Customer Outcomes, including a number which are relevant to this Planning Proposal as outlined below.

- Successful places: Walking or cycling is the most convenient option for short trips around centres and local areas, supported by a safe road environment and suitable pathways
- A strong economy: 30-minute access for customers to their nearest metropolitan centre and strategic centre by public transport seven days a week

The Planning Proposal will support these outcomes by locating housing growth adjacent to walking and cycling networks and in close proximity of high frequency public transport which provides access to the Sydney CBD and other centres within 30 minutes travel time.

The site will also benefit from improved cycling connections with the planned \$240 million Kingsford to Centennial Parklands cycleway currently under construction. The new cycleway will provide a dedicated 2.8km cycleway connecting the Kingsford Light Rail terminus to the Centennial Park cycleway at Alison Road, Randwick.

3.4 Future Directions for Social Housing

The NSW Government's Future Directions for Social Housing Strategy was released in 2016, and sets out the vision for social housing over the next 10 years and establishes strategic priorities, including:

- Deliver more housing and a better social housing experience, with better quality social housing and improved social outcomes.
- Develop new mixed communities where social housing blends in with private and affordable housing, with better access to transport and employment, improved community facilities and open spaces.
- Partner with the private and not for profit sectors to fast track the redevelopment of sites in metropolitan Sydney and regional NSW

Supporting these objectives, Action 1.1 in Future Directions, is to 'Increase redevelopment of LAHC properties to renew and grow supply'. This provides a clear directive and strategic justification for the NSW Government to redevelop land to deliver increased social housing.



3.5 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.

The document identifies the key priorities for NSW that future design should respond to. These include challenges in relation to climate resilience, rapid population growth, health, changing lifestyles and demographics, infrastructure and urban renewal and the delivery of major projects.

Better Placed is underpinned by seven objectives that outline the key design considerations for the built environment of NSW:

- Better fit contextual, local and of its place
- Better performance sustainable, adaptable and durable
- Better for community inclusive, connected and diverse
- Better for people safe, comfortable and liveable
- Better working functional, efficient and fit for purpose
- Better value creating and adding value
- Better look and feel engaging, inviting and attractive

The Planning Proposal delivers a place-based approach to design that responds to the surrounding built form context and planning densities, while respecting the Daceyville heritage conservation area and protecting amenity to neighbours.

These objectives have informed the design process for development of the proposal and reference scheme, as outlined in the Urban Design Study at Appendix C.

3.6 Greener Places and Draft Greener Places Design Guide

Greener Places is a design framework produced by GANSW to guide the planning, design, and delivery of green infrastructure in urban areas across NSW.

The policy establishes a framework to realise the following key green infrastructure objectives:

- To protect, conserve and enhance NSW's network of green and open natural and cultural spaces
- To secure a network of high quality, high performing and well-designed green space, establishing a crucial component of urban infrastructure to address the environmental challenges of the twenty-first century
- To promote healthy living, encouraging physical activity, social cohesion, and enhancing wellbeing by providing liveable places for the NSW community
- To create a more strategic approach to planning for Green Infrastructure, encouraging early and integrated investment through statutory planning
- To deliver better tools for the delivery of Green Infrastructure.

The draft Green Spaces Design Guide was released in 2020 to support the implementation of Greener Places. The Guide seeks to apply a new consistent framework for planning public open space and responds to the challenges of increasing density and decreasing land supply through a performance-based approach.

Of particular relevance to the proposal, the Guide sets out performance criteria for planning for open space and recreation, including accessibility benchmarks for high density residential development to be with 200m of local open space and 2km of district open space. The

performance criteria outlined in the plan which are of particular relevance to the site are outlined in Table 2 below.

Table 2: Open Space for Recreation Guide criteria

Type of open space	Performance indicator
Local open space	 for a high-density neighbourhood within 2–3 minutes' walk / 200 m walking distance for a high-density neighbourhood size ranging from 0.5 – 2ha. a desirable minimum size of 3,000sqm although in high density neighbourhoods where more efficient provision does not exist, they may be as small as 1,500sqm
District open space	 within 25 minute's walk / 2km size ranging from 2 – 5 ha.
Regional open space	 Up to 30 minutes travel time on public transport or by vehicle / within 5 – 10km. Area of 5ha or greater.

The site is serviced by extensive open space areas and meets the criteria for local, district and regional open space as established in the draft Design Guide.

The site is within 100m of Daceyville Gardens a large one-hectare local open space, it is within 600m or 10-minute walk to Rowland Park, which is approximately 7 hectares and provides district and regional level open space including sports fields, a children's playground and outdoor gym equipment. The site is also within 600m of a range of recreation and sporting facilities at the UNSW David Phillips Sports Field.

The site is also within 800m of Paine Reserve a 2.5-hectare district level open space which includes play equipment, a dog park and sports fields.

3.7 Randwick Local Strategic Planning Statement

The Randwick Local Strategic Planning Statement (LSPS) was adopted by Council in February 2020 and endorsed by the Greater Sydney Commission in March 2020. The LSPS establishes a framework for land use planning and growth over the next 20 years.

The LSPS focuses housing growth around strategic and town centres close to transport and services to support a 30-minute City. The LSPS Structure Plan identifies locations of 0–10-year housing growth to guide future housing supply. The site is located within a committed 0-10 year housing growth area (Kingsford South).

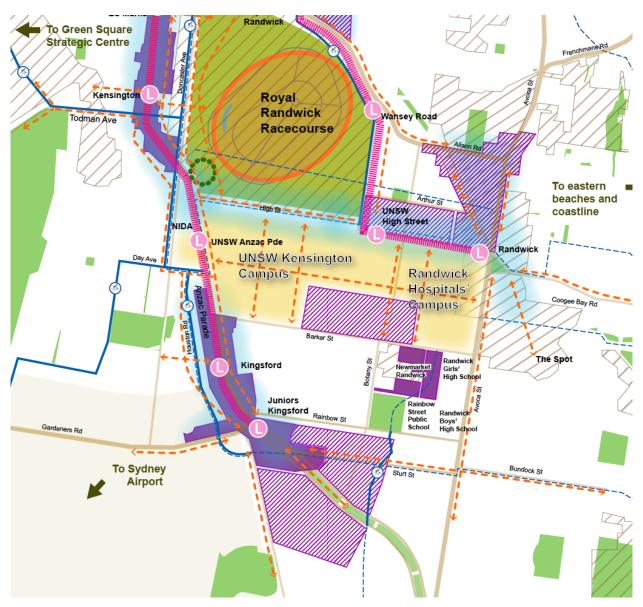


Figure 7 LSPS Structure Plan

The LSPS also includes planning priorities for housing and growth. The relevant planning priorities are addressed in Table 3 below.

Table 3: Consideration of Local Strategic Planning Statement

Planning Priority	Consideration
Liveability	
Provide diverse housing options close to transport, services and facilities	The Planning Proposal will deliver increased housing supply and improved housing options close to public transport and the Kingsford town centre. The site is located approximately 350m from the Kingsford Juniors Light Rail stop.
Increase the supply of affordable rental housing stock to retain and strengthen our local community	The proposal is consistent this priority as it will renew and increase social housing on the site.



Encourage development that responds to the local character and desired future character of our neighbourhoods	The proposal responds to the planned and emerging high-density character of Kingsford town centre and Kingsford South HIA and provides an appropriate transition to lower density areas and the Daceyville heritage conservation area.
Conserve and protect our unique built cultural heritage	The Planning Proposal is located close to the Daceyville heritage conservation area. The proposal provides an appropriate interface to the conservation area, and potential heritage impacts have been addressed in the Heritage Impact Statement.
Support the delivery of social infrastructure to meet the needs of our diverse community	The site is located close to a range of existing social infrastructure including local schools, health and open space. The proposal is expected to create minimal demand for additional social infrastructure and any impacts would be offset by local infrastructure contributions.
Provide greater access and opportunities for walking and cycling	The proposal is located close to planned regional cycling connections to the CBD via the Kingsford to Centennial Parklands cycle way, currently under construction.
Plan for and support strong connections to support a 30-minute city	The Planning Proposal will support a 30-minute city but increasing housing within 30 minutes of local services, jobs and amenities.
Sustai	nability
Provide high quality open space and Recreational facilities	The site is within close proximity to open space and recreational facilities. The proposal seeks to locate high density housing in close proximity to open space with a large local open space located with 100m of the site meaning that all residents would be easily within 200m of a substantial open space.
Increase tree canopy cover	The proposal seeks to retain significant trees along Bunnerong Road and Anderson Street and increase tree planting across the site. The proposal demonstrates that the proposal would be able to deliver 25% canopy cover.
Reduce the consumption of energy and water	The Planning Proposal is supported by a ESD Report which outlines a range of sustainability measures to be incorporated into future development. Future development will also need to demonstrate compliance with Council's sustainability provisions in the HIA DCP and the targets in the Sustainable Buildings SEPP.
Infrastructure and Collaboration	
Develop an integrated approach to more sustainable transport	The site is within 350m of the L3 Sydney CBD and Southeast Light Rail (Juniors Kingsford Terminus stop) and will be supported by improved regional cycling connections to the CBD via the Kingsford to Centennial Parklands cycle way currently under construction.



Align planned growth with infrastructure delivery	The proposal will align increased housing supply (including social housing) with existing light rail and bus transport infrastructure (392 bus route to Redfern and Little Bay within 100m of the site on Bunnerong Road) and planned regional cycleway connections.
---	---

3.8 Randwick Local Housing Strategy

The Randwick Local Housing Strategy (LHS) establishes the strategic framework for residential growth within Randwick City to 2040.

The LHS identifies the need for an additional 14,600 dwellings by 2036 to accommodate population growth. This includes an additional 4,300 dwellings to meet the 6-10 housing growth targets (the 5-year period between 2021-2026).

The LHS establishes the following guiding principles for future housing growth in the LGA:

- Concentrate growth in accessible locations in and around centres and within walking distance of shops, employment, public transport, facilities and services
- Enhance housing choice and diversity in our lower density residential areas including small lot housing, semi-detached, town houses, adaptable and seniors housing
- Concentrate growth in and around planned renewal or infrastructure projects, to better reflect built environment changes (e.g. Randwick Heath and Education Precinct)
- Focus growth around areas of high amenity and recreational value
- Recognise and preserve our special character areas and values
- Increase affordable rental housing and social housing
- Balanced approach to growth across the City

The LHS identifies areas in close proximity to strategic and town centres for increased housing. This includes the site, which is identified within the Kingsford South HIA, identified as an area for housing growth given its proximity to the Kingsford town centre (as shown in Figure 8).

The Planning Proposal aligns with the guiding principles in the LHS as it will deliver increased housing in a highly accessible location, provide increased social and affordable housing on the site, and concentrate housing growth in an identified growth area with excellent access to infrastructure and services.



Figure 8 Housing growth areas in LHS

The LHS includes priorities and objectives to guide housing growth which will need to be addressed in the Planning Proposal. The relevant priorities and objectives are included in Table 4 below.

Priorities and objectives	Consideration
Strategic principles for growth	
Ensure a balanced approach to growth across Randwick City	The site is in an identified HIA, and the Planning Proposal will contribute toward Council's 6-10 year housing target of 4,300 new dwellings.
Diverse housing to meet the needs of our community	The Planning Proposal will increase housing supply and renew and increase the supply of social housing in the Randwick LGA.
Focus growth in and around town and strategic centres close to transport, jobs and services	The site is located close to the Kingsford town centre and within easy walking distance of public transport and local services.
Increase affordable rental housing across Randwick City	The Planning Proposal will renew and increase social housing on the site.
Ensure new development is consistent with the desired future character of areas	The proposal will make a positive contribution to the built environment and responds the existing and

	emerging higher density character of the Kingsford town centre and Kingsford South HIA.
Ensure design excellence and sustainability principles in new development	Future development will be required to demonstrate design excellence in accordance with the provisions of the Randwick LEP. Future development will also be required to comply with the sustainability measures in the Randwick HIA DCP.
Ensure future redevelopment sites are aligned with future transport investment	Redevelopment of the site is supported by existing and planned transport infrastructure, including light rail, bus and cycling infrastructure.
Support housing growth with appropriate infrastructure	The site has been identified for growth given it is within close proximity to the Kingsford town centre and access to high frequency public transport.



4 Statutory context

4.1 Randwick local environment plan 2012

The *Randwick Local Environmental Plan 2012* (Randwick LEP) is the principal planning instrument applying to the Site. A summary of the key controls which apply to the site is provided in Table 5 below and in Section 4.1.1 to 4.1.4.

Clause	Summary of provisions
Land Use Zoning	R3 Medium Density Residential (see Figure 9)
4.3 Height of Buildings	12m (see Figure 10)
4.4 Floor Space Ratio	0.75:1 (see Figure 11)
5.10 Heritage Conservation	The site is not a heritage item or located within a heritage conservation area. The site is located within proximity to the Daveyville Heritage Conservation Area, within the Bayside LGA (see Figure 12)
6.11 Design excellence	Clause 6.11 requires development to demonstrate design excellence and applies to development on a site over 10,000sqm, development over 15m, or on land that requires the preparation of a DCP.
	As the proposal includes heights over 15m, future development will be required to demonstrate design excellence including consideration of architectural design, quality and amenity of public domain, relationship to surrounding development, sustainability, and view impacts
6.12 Development requiring preparing of DCP	Clause 6.12 requires the preparation of a DCP for sites identified on the Key Sites Map.
	The site is not currently identified on the Key Sites Map but an amendment to the Randwick DCP has been prepared to support the Planning Proposal.

Table 5 LEP provisions

This Planning Proposal seeks to facilitate an amendment to the Randwick LEP which is discussed in Section 5.2.

4.1.1 Land use zoning

The site is zoned R3 Medium Density Residential. Land immediately north of the site is zoned SP2 Infrastructure. Surrounding residential land to the east and north is zoned R3 Medium Density Residential.

Land to the south and west of the site is zoned R2 Low Density Residential. Land further north of the site in the Kingsford town centre is zoned E2 Local Centre.



Figure 9: Land use zoning map (Source: eplanning spatial viewer))

4.1.2 Building height

The site has a maximum building height of 12m (refer to Figure 4). Building heights surrounding the site range from 9.5m to 16.5 and increase in the north around the Kingsford centre to 24m (base control) with incentive height controls ranging from 25m to 51m.



Figure 10: Height of buildings map, note incentive heights also apply up to 51m (Source: eplanning spatial viewer)



4.1.3 Floor space ratio

The site has a maximum FSR control of 0.75:1. Surrounding land has a maximum FSR ranging from 0.5:1 to 1:6:1. Land to the north in the Kingsford town centre has a base FSR of 3:1 with incentive FSR ranging from 4:1 to 5:1.



Figure 11: FSR map (Source: eplanning spatial viewer)

4.1.4 Heritage

The site is located in proximity to the Daceyville heritage conservation area to the west of Bunnerong Road.



Figure 12: Heritage map (Source: eplanning spatial viewer)

4.2 Housing Investigation Areas Development Control Plan

Council has prepared a DCP for the four HIA's which includes general controls and site-specific controls for each of the four HIA's (as shown in Figure 13).



Figure 13 Housing Investigation Areas

The site is located within the South Kingsford HIA but is deferred from the DCP (see Figure 14).

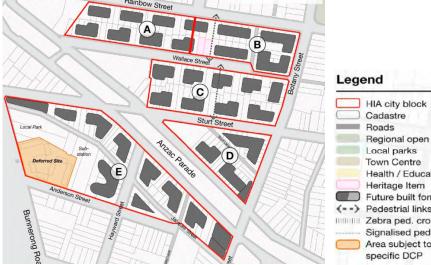


Figure 14 Deferred Site (shown in orange)

Legend	
	HIA city block
	Cadastre
-	Roads
1.00	Regional open space
	Local parks
	Town Centre
	Health / Education
	Heritage Item
	Future built form
(>	Pedestrial links
mmena	Zebra ped. crossing
*********	Signalised ped. crossing
	Area subject to site
	specific DCP



The HIA DCP includes urban design and place making principles for development in the HIAs' as follows:

- Provide quality affordable housing to meet local housing needs, particularly for key workers, essential workers and students
- Provide a supporting and innovative land use role when adjoining health and education campuses, and business centres / town centres
- Facilitate a 20 minute walking city precinct
- Contribute to the Green Grid, add tree canopy cover and extend the local network of green spaces, streets, plazas and laneways
- Provide a living environment for residents that is high in liveability and amenity and exceeds the minimum standards of the Apartment Design Guide (ADG)
- Create a positive street level environment through built form that is permeable, maintains human scale within the city blocks and streetscapes and allows solar access to key parts of the public realm
- Provide neighbourhoods that promote active transport (walking and cycling) through the creation of through site links and wider footpaths
- Create an attractive, landscaped public domain that gives a sense of place and encourages social interaction
- Ensure that new infill development respects the fine-grain character of heritage items, contributory properties and buildings
- Achieve urban design, architectural and landscape design excellence including best practice environmentally sustainable design
- Achieve innovative place-led solutions for local hydrology and resilience.

The Planning Proposal has responded to the principles outlined above which recognises the Kingsford South HIA as an area to support renewal and housing growth.

The Planning Proposal seeks amendments to the Randwick DCP including identification of sitespecific development controls which would apply to the site. This is discussed in further detail in Section 5.3.

A summary of the relevant Randwick E7 Housing Investigation Areas DCP controls is provided in Appendix A.



5 The proposal

5.1 Urban design and reference scheme

This Planning Proposal seeks to facilitate the renewal of a large and highly accessible site, to provide increased housing and renew existing social housing on the site. The Planning Proposal would facilitate renewal of the site for approximately 185 dwellings with a mix of social, affordable and private housing.

All existing social dwellings will be replaced with new more sustainable fit for purpose social dwellings and additional new social dwellings will be provided to ensure no net loss of social housing on site. The proposal aims to maximise the proportion of social and affordable housing, with potential for up to 50% social and affordable housing to be provided on site.

The Planning Proposal is supported by a reference scheme prepared by PTW Architects which demonstrates how the proposed planning controls could be achieved on the site. The reference scheme is provided in the Urban Design Study (Appendix C).

The reference scheme responds to the surrounding built form and landscape character, and the higher density development that is already underway around the Kingsford town centre and planned for the Kingsford South HIA.

The reference scheme provides a transition in scale and form between the high-density Kingsford town centre, planned mid-rise areas in the surrounding Kingsford South HIA, and established lower scale residential areas to the south and west. Within the site, the reference scheme provides for a highly articulated and varied built form with lower heights along Anderson Street frontage, and generous setbacks to provide a transition in height from Anderson Street. The reference scheme provides transition and articulation of built form with heights ranging from 5 to 8 storeys (refer to Figure 15 and Figure 16).



Figure 15 Reference scheme indicative layout (Source: PTW)



The proposed built form has been located to ensure that most high value street trees can be retained and protected. This is supported through increased street setbacks to accommodate tree protection and tree canopy along Bunnerong Road. These setbacks also provide for an enhanced landscaping and additional tree planting, whilst providing an appropriate interface and transition to the Daceyville heritage conservation area and neighbouring properties (refer to Figure 7).

It is noted that the proposal is located adjacent to SP2 zoned land and electrical infrastructure to the north and east and therefore, the minimum building separation which is required for privacy between apartments in the ADG is not required. The reference scheme demonstrates a site-specific approach to setbacks based on the surrounding infrastructure use, retention of significant trees and tree canopy, and consideration of streetscape and amenity impacts.

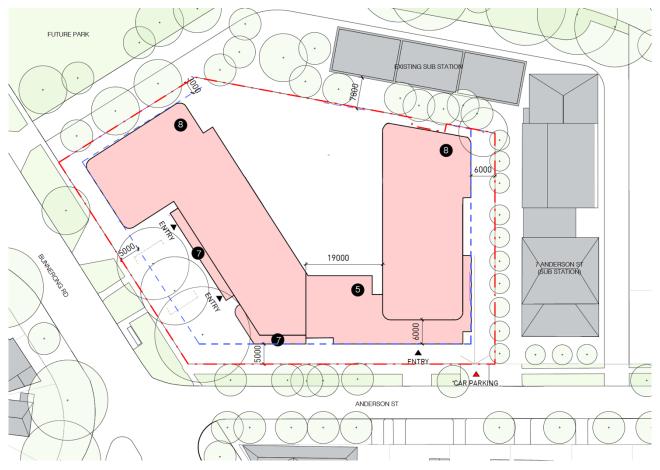


Figure 16 Proposed heights and setbacks (Source: PTW)

The proposal seeks to maximise views and outlook, with the Energy Australia green space to the north of the site providing north-facing views and outlook from the site. The reference scheme has been designed around a large north facing central communal open space which seeks to maximise sunlight and amenity for future residents (refer to Figure 17).

The proposal would provide for extensive landscaping and canopy cover, including:

- Retention of significant trees along Bunnerong Road and street trees on Anderson Street
- Deep soils zones with the generous north facing communal open space and landscaped front setbacks, demonstrating the proposal is capable of achieving 20% deep soil.
- Provision for 25% tree canopy cover.



Figure 17 Indicative landscape plan (Source: PTW)

5.2 **Proposed LEP amendments**

To facilitate development on the site consistent with the reference design scheme, changes are proposed to the Randwick LEP 2012. These are included at Section 7 and include the following:

- Increasing the maximum height of buildings from 12m to 28m
- Increasing the maximum floor space ratio from 0.75:1 to 2.7:1

5.3 Proposed DCP amendments

To support the Planning Proposal, a draft DCP amendment has been prepared. The draft DCP amendment is provided at Appendix B. The draft DCP is proposed for inclusion in the Randwick DCP 2013. Additional provisions in the Randwick DCP, including the general provisions in the Randwick HIA DCP 2023 which would apply to development on the site. The draft DCP amendment includes the following provisions:

- Indicative layout and built form
- Setbacks and height in storeys
- Guidance on building design
- Access arrangements
- Landscaping
- Tree retention and tree canopy

6 Objectives and intended outcomes

The objectives and intended outcomes of the Planning Proposal are to:

- Introduce new planning controls for the site to facilitate the renewal of the site for approximately 185 dwellings.
- Recognise the opportunity to deliver increased housing supply on a large site in single ownership, within an identified housing growth area.
- Facilitate increased housing supply in an area with excellent access to existing infrastructure and services including public transport, employment, health and education, and open space.
- Deliver a high-quality development which facilities the renewal of the existing aged social housing, increases the amount of social housing on site, and ensures a mix of housing and tenures is provided to meet local housing needs and foster community connection.
- Provide a transition in scale and form between the high density Kingsford town centre, planned mid-rise development in Kingsford South and the established lower scale areas to the south and west.
- Retain the amenity of the surrounding residential uses by ensuring an appropriate built form transition and an adequate level of solar access and privacy is maintained.
- Deliver a built form outcome which responds appropriately to the Daceyville conservation area and lower scale residential areas.
- Maintain and enhance the sites landscape character and amenity of adjoining streets by retaining significant street trees, providing increased street tree plantings and tree canopy.



7 Explanation of provisions

The Planning Proposal seeks to achieve the intended outcomes outlined at Section 6 by making amendments to the Randwick LEP.

The Planning Proposal seeks to amend the Randwick LEP 2012 to:

- Amend the maximum FSR control from 0.75:1 to 2.7:1.
- Amend the maximum height of buildings control from 12m to 28m.

No change is proposed to the R3 Medium Density Residential zone, which permits residential flat buildings with consent.

The proposed amendments are required to facilitate redevelopment of the site.

These changes require amendments to the Height of Buildings and Floor Space Ratio as shown in Section 8.

Note: While there is no technical requirement for a site specific DCP an update to the Randwick DCP has been prepared given it was a deferred site from Council Housing Investigation Area DCP.



8 Mapping

The Planning Proposal requires changes to the Height of Buildings and Floor Space Ratio Maps in the Randwick LEP as shown in Figure 18 and Figure 19.

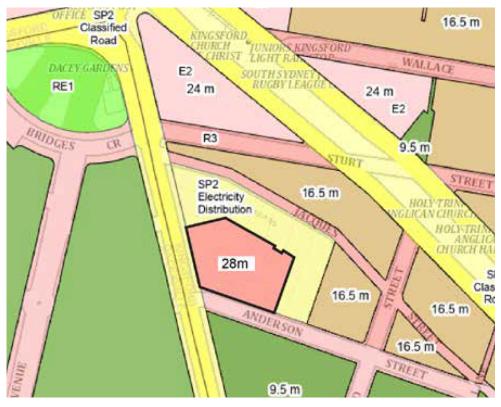


Figure 18: Proposed Height of Buildings map (Source: PTW)



Figure 19: Proposed FSR map (Source: PTW)

9 Justification of strategic merit

This section sets out the justification for the Planning Proposal and addresses key questions to consider when demonstrating the justification as outlined in the *Local Environmental Plan Making Guideline* (Department of Planning and Environment August 2023).

9.1 The need for the Planning Proposal

Q1. Is the Planning Proposal a result of any strategic study or report?

Yes, the Planning Proposal is the result of Randwick's Local Strategic Planning Statement and Local Housing Strategy which identify the site within the Kingsford South HIA, a housing growth area. The site was deferred from Council's recently finalised HIA Planning Proposal to allow NSW LAHC to prepare a site-specific Planning Proposal for the site.

The proposal is consistent with the Eastern City District Plan, and Randwick's LSPS and Housing Strategy which identify the need to increase the supply and diversity of new housing in accessible locations within the LGA.

The Planning Proposal is also consistent with the NSW Government's Future Directions for Social Housing Strategy was released in 2016. Action 1.1 in Future Directions is to 'Increase redevelopment of LAHC properties to renew and grow supply'. This provides a clear directive and strategic justification for the NSW Government to redevelop land to deliver increased social housing.

Q2. Is the Planning Proposal the best means of achieving the objective or intended outcomes or is there a better way?

Yes, the Planning Proposal is the best means of achieving the objectives and intended outcomes.

The issues covered by this Planning Proposal relate to statutory issues under Part 3 of the *Environmental Planning and Assessment Act 1979.* The Planning Proposal is the only mechanism that can achieve the objectives and intended outcomes related to the site.

9.2 Relationship to strategic planning framework

Q3. Is the Planning Proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?

The Planning Proposal is consistent with the Greater Sydney Region Plan and the Eastern City District Plan as outlined in Section 3.1 and 3.2 respectively.

Q4. Is the Planning Proposal consistent with a council's local strategy or other strategic plan?

The Planning Proposal is consistent with the Randwick LSPS, and Housing Strategy as outlined in Section 3.7 and 3.8.

Q5. Is the Planning Proposal consistent with applicable State Environmental Planning Policies

An analysis of the consistency of the proposed amendments with relevant State Environmental Planning Policies (SEPPs) is listed in Table 6.

Table 6: Analysis against State Planning Policies

Policy	Assessment
SEPP Housing – Chapter 4	Chapter 4 of the Housing SEPP seeks to promote good design of apartments through the establishment of the Apartment Design Guide. The Planning Proposal is consistent with the principles in Chapter 4 of the Housing SEPP. The reference design scheme demonstrates that a future development can comply with design criteria of the Apartment Design Guide, and the Urban Design Study (Appendix C) includes an assessment against these criteria.
Sustainable Buildings SEPP 2022	The Sustainable Buildings SEPP commenced on 1 November 2023 and requires future residential development to achieve minimum levels of energy and water efficiency, as well as thermal comfort. BASIX Certificates will be included as part of future development applications to demonstrate compliance with the requirements in the Sustainable Buildings SEPP BASIX requirements. The Sustainable Buildings SEPP will apply to future development on the site and development will need to comply with the higher BASIX standards. The ESD Strategy demonstrates that the Planning Proposal is capable of achieving the sustainability measures in the SEPP.
SEPP Resilience and Hazards	SEPP Resilience and Hazard includes planning controls for the remediation of contaminated land. The policy states that the planning authority must consider whether the land is contaminated, and if so that the land is suitable in its contaminated state for the permitted uses in the zone, or that the land requires remediation before the land is developed for that purpose. The Planning Proposal does not propose to rezone the site or change the use of the land. Any future development will be subject to the requirements in Chapter 3 of SEPP Resilience and Hazards at the development application stage.

Q6. Is the Planning Proposal consistent with the applicable Ministerial Directions?

The proposal is consistent with all relevant Ministerial directions under Section 9.1 of the *Environmental Planning and Assessment Act 1979*.

An assessment of the proposal against the applicable Section 9.1 directions is supplied in Table 7.

Table 7: Analysis against Ministerial Directions

Ministerial Direction	Assessment
Focus Area 1: Planning	Systems
1.1 Implementation of Regional Plans	 This Direction requires the Planning Proposal is to be consistent with the Greater Sydney Region Plan – A Metropolis of Three Cities, the regional plan for Greater Sydney. The proposal is consistent with the Greater Sydney Region Plan and has been considered against relevant aspects of the Plan as outlined in Section 3.1.
Focus Area 3: Biodivers	ity and Conservation

3.2 Heritage Conservation	The Direction sets out that a Planning Proposal must include provisions to
	facilitate heritage conservation.

Ministerial Direction	Assessment
	The site is not identified as a heritage item and the proposal does not seek any changes to the proposed heritage listings within the surrounding area.
	The reference scheme has been developed to respond to the Daceyville heritage conservation area.
	The Heritage Impact Statement confirms that the proposal will not impact the heritage significance of the Daceyville heritage conservation area (see Section 9.3.6 and Appendix F).
Focus Area 4: Resilience	and Hazards
4.1 Flooding	The objectives of this direction are to: a) ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005, and b) ensure that the provisions of an LEP that apply to flood prone land are commensurate with flood behaviour and includes consideration of the potential flood impacts both on and off the subject land.
	The requirements of the direction are considered and addressed below.
	 Part 1 Requires that a Planning Proposal must include provisions that give effect to and are consistent with: a) the NSW Flood Prone Land Policy, b) the principles of the Floodplain Development Manual 2005, c) the Considering flooding in land use planning guideline 2021, and d) any adopted flood study and/or floodplain risk management plan prepared in accordance with the principles of the Floodplain Development Manual 2005 and adopted by the relevant council.
	This is considered and addressed in the Stormwater and Flood Risk Assessment at Appendix J, including consideration of the Birds Gully and Bunnerong Road Flood Study.
	Part 2 Requires that a Planning Proposal must not rezone land within the flood planning area from Recreation, Rural, Special Purpose or Conservation Zones to a Residential, Employment, Mixed Use, W4 Working Waterfront or Special Purpose Zones.
	The Planning Proposal does not seek to change the R3 Medium Density Residential zone and accordingly this is not applicable.
	 Part 3 Requires that a Planning Proposal must not contain provisions which apply to the flood planning area which: a) permit development in floodway areas, b) permit development that will result in significant flood impacts to other properties, c) permit development for the purposes of residential accommodation in high hazard areas, d) permit a significant increase in the development and/or dwelling density of that land, e) permit development for the purpose of centre-based childcare facilities, hostels, boarding houses, group homes, hospitals, residential care facilities, respite day care centres and seniors housing in areas where the occupants of the development cannot effectively evacuate,

Ministerial Direction	Assessment
	 f) permit development to be carried out without development consent except for the purposes of exempt development or agriculture. Dams, drainage canals, levees, still require development consent, g) are likely to result in a significantly increased requirement for government spending on emergency management services, flood mitigation and emergency response measures, which can include but are not limited to the provision of road infrastructure, flood mitigation infrastructure and utilities, or h) permit hazardous industries or hazardous storage establishments where hazardous materials cannot be effectively contained during the occurrence of a flood event.
	The Planning Proposal is consistent with these requirements as the site is not affected by the 1% AEP flood (flood planning area). A small portion of the site along Bunnerong Road is affected by the PMF flood, and this is addressed below.
	 Part 4 Requires that a Planning Proposal must not contain provisions that apply to areas between the flood planning area and probable maximum flood to which Special Flood Considerations apply which: a) permit development in floodway areas, b) permit development that will result in significant flood impacts to other properties, c) permit a significant increase in the dwelling density of that land, d) permit the development of centre-based childcare facilities, hostels, boarding houses, group homes, hospitals, residential care facilities, respite day care centres and seniors housing in areas where the occupants of the development cannot effectively evacuate, e) are likely to affect the safe occupation of and efficient evacuation of the lot, or f) are likely to result in a significantly increased requirement for government spending on emergency management services, and flood mitigation and emergency response measures, which can include but not limited to road infrastructure, flood mitigation infrastructure and utilities. Special Flood Considerations are defined by <i>Considering flooding in land use planning guideline</i> (DPE July 2021) as flood risk considerations that a consent authority must be satisfied with before granting consent to certain types of development that have been identified as having a higher risk to life and warranting the consideration of the impacts of flood levels outside the flood planning area.
	Special Flood Consideration are applied through an optional clause in the Standard Instrument. The Special Flood Considerations clause has been adopted in the Randwick LEP and accordingly these requirements are appliable.
	 The Planning Proposal is consistent with these requirements: Does not relate to land identified as a floodway or a high hazard area Does not permit development which would have the potential to result in flood impacts to other properties The specified sensitive uses are already permissible either under the Randwick LEP, Housing SEPP or Transport and Infrastructure SEPP. The minimum habitable floor level (24.85mAHD) is higher the PMF level and includes sufficient freeboard above the PMF flood level (24.12mAHD).

* In the event of a flood up to and including the PMF, residents can safely evacuate the site in a southerly direction onto Bunnerong Road and seek a safe place as the higher side of Bunnerong Road. * As the floor levels are higher than the PMF level, residents can safely shelter in place as the duration of the flood event will be short. • Emergency access to the proposed buildings can be achieved from the southern and eastern sides which are not affected by flood. • The proposed basement entry is located on Anderson Street and is not subject to flooding. Part 5 Requires that in preparing a Planning Proposal, the flood planning area must be consistent with the principles of the Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Development Manual 2005 or as otherwise and proposal is consistent with all aspects of Direction 4.1 flooding. This direction requires an ensult of the	Ministerial Direction	Assessment
4.4 Remediation of Contaminated Land This direction requires consideration of contamination where a Planning Proposal seeks to include land in a particular zone, that would constitute a change of use. The site is currently zoned R3 Medium Density Residential, and this is not proposed to change as a result of the Planning Proposal. Focus Area 5: Transport >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>		 evacuate the site in a southerly direction onto Bunnerong Road and seek a safe place at the higher side of Bunnerong Road. As the floor levels are higher than the PMF level, residents can safely shelter in place as the duration of the flood event will be short. Emergency access to the proposed buildings can be achieved from the southern and eastern sides which are not affected by flood. The proposed basement entry is located on Anderson Street and is not subject to flooding. Part 5 Requires that in preparing a Planning Proposal, the flood planning area must be consistent with the principles of the Floodplain Development Manual 2005 or as otherwise determined by a Floodplain Risk Management Study or Plan adopted by the relevant council. This Planning Proposal does not seek any change to the flood planning area adopted by Council. Conclusion The Planning Proposal is consistent with all aspects of Direction 4.1
Focus Area 5: Transport == Infrastructure 5.1 Integrating Land Use and Transport The Direction requires a Planning Proposal to include provisions consistent with the principles of Integrating Land Use and Transport as outlined in key polies and guidelines. The proposal meets these principles by providing housing in an area within walking distance to local services amenities, with excellent public transport accessibility, and pedestrian and cycle connectivity. 5.3 Development Near Regulated Airfields and Defence Airfields This direction requires a planning proposal to include provisions to ensure that development meets Australian Standard 2021 – 2015, Acoustic- Aircraft Noise Intrusion – Building siting and construction with respect to interior noise levels if the proposal seeks to rezone land for residential purposes or to increase residential densities in areas where the ANEF is between 20 and 25. The site is located between the 20 and 25 ANEF contours and therefore future development will be subject to Clause 6.9 of the Randwick LEP which meets the requirements of the Direction. An acoustic assessment has been prepared to accompany this Planning Proposal which demonstrates that aircraft noise can be appropriately mitigated at the development stage (Appendix I). Focus Area 6: Housing This Direction requires that a Planning Proposal relating to residential zoned		This direction requires consideration of contamination where a Planning Proposal seeks to include land in a particular zone, that would constitute a change of use. The site is currently zoned R3 Medium Density Residential, and this is not
5.1 Integrating Land Use and TransportThe Direction requires a Planning Proposal to include provisions consistent with the principles of Integrating Land Use and Transport as outlined in key polies and guidelines.5.3 Development Near Regulated Airfields and Defence AirfieldsThis direction requires a planning proposal to include provisions to ensure that development meets Australian Standard 2021 – 2015, Acoustic- Aircraft Noise Intrusion – Building siting and construction with respect to interior noise levels if the proposal seeks to rezone land for residential purposes or to increase residential densities in areas where the ANEF is between 20 and 25.The site is located between the 20 and 25 ANEF contours and therefore future development will be subject to Clause 6.9 of the Randwick LEP which meets the requirements of the Direction.Focus Area 6: HousingThis Direction requires that a Planning Proposal relating to residential zoned	Focus Area 5: Transport	
Regulated Airfields and Defence Airfieldsthat development meets Australian Standard 2021 – 2015, Acoustic- Aircraft Noise Intrusion – Building siting and construction with respect to interior noise levels if the proposal seeks to rezone land for residential purposes or to increase residential densities in areas where the ANEF is between 20 and 25.The site is located between the 20 and 25 ANEF contours and therefore future development will be subject to Clause 6.9 of the Randwick LEP which meets the requirements of the Direction.An acoustic assessment has been prepared to accompany this Planning Proposal which demonstrates that aircraft noise can be appropriately mitigated at the development stage (Appendix I).Focus Area 6: Housing6.1 Residential ZonesThis Direction requires that a Planning Proposal relating to residential zoned	a a	with the principles of Integrating Land Use and Transport as outlined in key polies and guidelines. The proposal meets these principles by providing housing in an area within walking distance to local services amenities, with excellent public transport
6.1 Residential Zones This Direction requires that a Planning Proposal relating to residential zoned	Regulated Airfields and	 that development meets Australian Standard 2021 – 2015, Acoustic- Aircraft Noise Intrusion – Building siting and construction with respect to interior noise levels if the proposal seeks to rezone land for residential purposes or to increase residential densities in areas where the ANEF is between 20 and 25. The site is located between the 20 and 25 ANEF contours and therefore future development will be subject to Clause 6.9 of the Randwick LEP which meets the requirements of the Direction. An acoustic assessment has been prepared to accompany this Planning Proposal which demonstrates that aircraft noise can be appropriately
	Focus Area 6: Housing	·
	6.1 Residential Zones	



Ministerial Direction	Assessment
	 broaden the choice of building types and locations available in the housing market make more efficient use of existing infrastructure and services reduce the consumption of land for housing and associated urban development on the urban fringe, and be of good design.
	The proposal will provide a greater range of housing options, including social, affordable and market housing, in an identified housing growth area in close proximity to existing infrastructure and services. A detailed Urban Design Study has also been prepared outlining appropriate built form to ensure good design which is discussed in Section 5.

9.3 Environmental, social and economic impacts

Q7. communities, or their habitats, will be adversely affected as a result of the proposal?

The Planning Proposal will not adversely affect any threatened species, populations or ecological communities. A number of existing trees are located on the site and within the surrounding streets, however these are associated with landscape planting and are not considered to have any biodiversity value. Therefore, no critical habitat or threatened species will be affected as a result of this proposal.

Q8. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed.

9.3.1 Overshadowing

The Urban Design Report (Appendix C) provides a detailed analysis of the overshadowing impacts of the proposal.

The built form has been located to minimise overshadowing impacts on neighbouring residential properties along Anderson Street.

The proposal would result in some minor overshadowing to the front façade of residential buildings on the southern side of Anderson Street. The solar analysis demonstrates that there will be minimal impact to existing residential properties on Anderson Street, with all properties maintaining at least 2 hours solar access in mid-winter.

The reference scheme demonstrates that proposed apartments will also receive excellent solar access with 72% receiving at least 2 hours of solar access in midwinter, achieving the requirements of the Apartment Design Guide.

9.3.2 Visual impact

The Urban Design Report (Appendix C) provides an assessment of the potential visual impacts associated with the proposal.

The proposal achieves acceptable visual impacts, and the scale of the proposal is consistent with the existing and planned densities in the surrounding area. The visual impact is minimal from the approach to the site from the east on Bunnerong Road as the proposal is screened by existing mature trees which are proposed to be retained as part of the proposal. The generous landscaped setback along Bunnerong Road, and the existing width of Bunnerong Road, further reduces the visual impact of the proposal when viewed from Daceyville.



The proposal ensures that privacy of nearby properties will be maintained. The proposed building setbacks between the site and nearby residential properties on Anderson Street provide adequate separation and privacy to future residents. The reference scheme demonstrates compliance with building separation and privacy design criteria in the ADG.

The visual impact of the proposal is also reduced through varied built form, including varied heights and setbacks to provide a transition in height and scale to Anderson Street to ensure an appropriate interface to lower scale residential properties. The proposed 5-storey street wall on Anderson Street is consistent with the planned heights and densities for surrounding sites in the Kingsford HIA.

The building envelopes have been designed to fit within the context and respond to the surrounding buildings. The proposal is consistent with the existing and planned built form and is considered appropriate in its context. The relationship between the proposal and surrounding built is shown in Figure 20 to Figure 23.



Figure 20 Existing view looking north along Bunnerong Road (Source: PTW)



Figure 21 Proposed view looking north along Bunnerong Road (Source: PTW)



Figure 22 Existing view looking west along Anderson Street (Source: PTW)



Figure 23 Proposed view looking west along Anderson Street (Source: PTW)

9.3.3 Residential amenity

The proposal has been developed with a view to maintaining the amenity and visual privacy for the surrounding area and providing a high level of residential amenity for the future residents of the development.

The proposal provides for generous building separation distances to surrounding lower density residential development on Anderson Street. This includes a 5-metre front setback to Anderson Street which will allow for the retention of street trees and enhanced landscaping between the development and existing dwellings to the south.

The existing residential dwellings on Anderson Street are setback at least 6.5m from Anderson Street, providing for building separation of around 25m to the existing low-rise dwellings. This interface will also be screened by retained street trees and landscaping within the front setback to minimise impacts.

The proposal has been developed with consideration of the Apartment Design Guide (ADG) and can comply with ADG key criteria as outlined in the Urban Design Report, including solar access,



cross ventilation, building separation, communal open space and deep soil. A full assessment against the ADG would be provided at DA stage.

The proposal seeks to provide a high level of residential amenity for apartments fronting Botany Road, particularly for those at the ground level. This is supported by the generous front setback ranging from 5m to 16m allowing for the retention of mature trees within the front setback and enhanced landscape planting to provide improved amenity and a landscape buffer to Bunnerong Road. This will enhance the existing landscape character of the site and Daceyville heritage conservation area.

The mature trees along Bunnerong Road respond to the leafy garden suburb of Daceyville opposite of Bunnerong Road and will screen future buildings up to 8 storeys on the site.

The Acoustic Assessment has also confirmed that noise impacts to apartments fronting Bunnerong Road can be appropriately mitigated (See Section X).

9.3.4 Arboricultural impact

An Arboricultural Impact Assessment has been prepared by Bluegum Tree Care and Consulting (Appendix E) to assess trees within and adjacent to the site and make recommendations to inform the reference design scheme and Planning Proposal.

The assessment assigned a tree retention value to each tree within and adjacent to the site. This is illustrated at Figure 19. The key findings of the assessment are summarised below:

- 49 trees are currently located on, or immediately adjacent to the site
- 16 trees are rated as 'high' retention value, with 7 'high' value trees located outside the site on Bunnerong Road and Anderson Street.
- 10 trees are rated with a moderate retention value.
- 23 trees have a low retention value (almost half of the total number of trees recorded are low value trees).

As shown in Figure 24, most high retention value trees are street trees fronting the site along Anderson Street and trees within the front setback on Bunnerong Road.



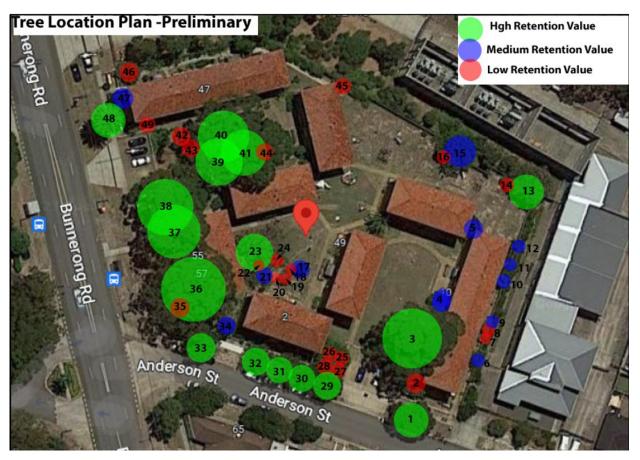


Figure 24 Tree location and value plan (Source: Bluegum)

The assessment recommends the following approach to tree retention, removal and relocation based on the above findings:

- Retention of 13 trees as part of proposed development.
- Retention of 11 high retention value trees (approximately 70% of all high value trees to be retained).
- Removal of 36 trees, comprising almost 60% low value retention trees.

The trees proposed for retention and removal are identified in Table 8.

Table 8 Tree proposed for retention and removal (Source: Bluegum)

	High Retention Value (Tree Number)	Medium Retention Value (Tree Number)	Low Retention Value (Tree Number)
To be Retained	1, 13, 29, 30, 31, 32, 33, 36, 37, 38, 48	-	14, 35
To be Removed	3, 23, 39, 40, 41	4, 5, 6, 10, 11, 15, 17, 21, 34, 47	2, 7, 8, 9, 12, 16, 18, 19, 20, 22, 24, 25, 26, 27, 28, 42, 43, 44, 45, 46, 49



The assessment also noted that as a result of the proposal, tree protection measures would be required as part of future development for works with the Tree Protection Zones of Tree 13, 36, 37 and 38.

The assessment concluded that the proposal would provide an acceptable level of protection to the trees which are proposed to be retained, subject to implementation of tree management recommendations at the development application stage.

9.3.5 Landscaping and tree canopy

A Landscape Concept Report has been developed by Land and Form Studios (Appendix D). The landscape concept aims to retain significant trees, provide for additional tree planting and enhance tree canopy.

The front setbacks provide for retention of significant trees along Bunnerong Road and Anderson Street, and the large central north facing communal open space allows for extensive deep soil areas for tree planting and landscaping.

The proposed increase in the maximum height on the site will allow for configuration of the built form around a large central communal open space, the retention of significant trees along Bunnerong Road within generous front setbacks, and to maximise both deep soil and ground floor communal open space. The proposal is capable of achieving the following landscape outcomes:

- Deep soil: 20% of the site area
- Ground floor communal space: 25% of the site area.
- Tree canopy: 25%

The proposal exceeds the target of 15% deep soil for large sites in the ADG and achieves the recommended canopy cover target for medium and high density residential areas outlined in the draft Green Places Design Guide prepared by the Government Architect NSW.

A detailed landscape plan will be prepared with any future DA to detail the landscape design for the site.

9.3.6 European heritage

A Preliminary Heritage Impact Statement has been prepared by PTW to inform the Planning Proposal (Appendix F).

The proposal is located opposite Daceyville, a model suburb with local heritage significance and identified as the Daceyville Heritage Conservation Area (HCA). Daveyville also contains a number of heritage items listed under the Bayside Council LEP 2021. There are no listed heritage items or heritage conservation areas in the vicinity of the site within the Randwick LGA.

The Heritage Impact Statement confirms that the proposal will have acceptable impacts to the Daveyville HCA, with proposed setbacks and modulated form reducing visual impacts from the conservation area.

The retention of existing mature trees along Bunnerong Road and Anderson Street also assists in reducing the visual impact of the development when viewed from Daceyville. The scale of the proposal is compatible with the predominant front setback of Bunnerong Road and Anderson Street and the setbacks incorporate landscaping which compliments the predominate soft landscape treatments of Daceyville.



The Heritage Impact Statement concludes that the proposal is sensitive to the immediate heritage context of Daceyville and any visual impacts are mitigated through building setbacks and the retention of street trees.

9.3.7 Traffic and transport

A Traffic and Transport Report has been prepared by Stantec (Appendix G). This report provides an assessment of the existing traffic and transport environment and the impact of the proposed development on the traffic and transport network. The assessment concludes that the proposal would have acceptable impacts and can be accommodated within the existing transport network.

Public and active transport

The site is well serviced by public transport, being within 350m of the Kingsford Light Rail Stop and high frequency bus services along Bunnerong Road (Bus routes 392, 392N and 392X). The recently completed L2 Randwick and L3 Kingsford lines connect Central and Sydney CBD with Randwick and Kingsford via Surry Hills and Moore Park with current frequency of 10 minutes during the day and 15 minutes at night.

There are well established pedestrian facilities in the local precinct providing good connectivity to a variety of key destinations such as Kingsford light rail stop, Kingsford town centre, Dacey Gardens and Rowland Park.

Randwick City Council is delivering walking and cycling improvements to provide an active transport link between Kingsford and Centennial Park. Construction is underway on a new 2.8km two-way cycleway and shared path improvements along Doncaster Avenue, Day Avenue, Houston Road, General Bridges Crescent, and Sturt Street. This will provide the local community and commuters a safe and convenient active transport option and improve accessibility. The cycleway will connect the Kingsford Light Rail terminus to the Centennial Park cycleway at Alison Road, Randwick.

The site is also well serviced with car share schemes, including existing GoGet cars on Anderson Street and within the Kingsford town centre.

Road network

The additional vehicle trips generated by the proposal is anticipated to 36 vehicles per hour in the morning peak and 28 vehicles per hour in the afternoon peak, which is considered insignificant in terms of impacts to the network.

The Traffic report includes intersection traffic modelling which assessed the impact of the proposal on the intersection of Bunnerong Road and Anderson Street. The traffic modelling concluded that applying traffic generated by the proposed development to the surrounding road network will have no adverse impact on the intersection between Bunnerong Road and Anderson Street and the intersection is expected to retain similar operation to existing conditions. The assessment concluded there is capacity within the surrounding road network to accommodate the additional traffic generated by the Planning Proposal.

Car parking

The proposed basement parking would accommodate approximately 200 parking spaces, demonstrating that the proposal can achieve the minimum requirements in the Randwick HIA DCP.

The amount of car parking to be provided on the site will be determined as part of the detailed design phase. A detailed parking assessment will be undertaken at DA stage, based on the proposed apartment mix and tenure mix for the site.



9.3.8 Ecologically sustainable development

An Ecologically Sustainable Development Report has been prepared by ESD Scientific and is provided at Appendix H. The report establishes the recommended sustainability measures for future development on the site.

The Sustainable Buildings SEPP will apply to future development on the site.

The proposal demonstrates that future development can comply with the higher standards in the Sustainable Buildings SEPP and provides a range of measures and initiatives to be implemented at the detailed design stage. This includes water and energy saving measures, sustainable construction materials, high performance building design and treatments, and sustainable transport measures to reduce private vehicle use.

The ESD Strategy also identifies opportunities for on-site renewal power initiatives, identifying opportunities for rooftop solar to be considered part of future development.

Sustainability targets are included in the Randwick HIA DCP and would apply to future development. The proposal can achieve the sustainability targets in the HIA DCP.

Sustainability targets and proposed measures will be considered in the detailed design stage and provided as part of any future development application for the site.

9.3.9 Flooding and stormwater

A Flooding and Stormwater Impact Assessment has been prepared by Henry & Hymas (Appendix J) to support the Planning Proposal. The study assesses the existing flooding and hydrological conditions and recommended approaches to address any potential impacts.

Flooding

The site is not affected by the 1% AEP flood, but it is affected by the PMF flood.

A small portion of the site along the Bunnerong Road frontage is affected in the PMF flood. The flood depths and flood levels at the site for PMF flood events is a maximum depth of 1.15m and a flood level of 24.12 mAHD.

The reference scheme includes floor levels set at 24.85 mAHD which is above the PMF level and includes sufficient freeboard above the PMF level of 24.12 mAHD.

The proposed basement access for the site is located on Anderson Street which is located the outside of the 1% AEP flood extent.

The Randwick DCP requires commercial floor levels and habitable residential floor levels to be no less than the 1% AEP flood plus half a metre freeboard. As outlined above, the proposal accommodates habitable floor levels above the PMF flood level and therefore, exceeds the mi minimum floor level requirement in the Randwick DCP.

In the event of a PMF flood event, emergency access to the proposed buildings can be achieved from the southern and eastern sides which are not affected by flood. Evacuation from the site is possible in the PMF event from the southern end of Bunnerong Road or Anderson Street. Alternatively, residents could safely shelter in place given the minimum floor levels are higher than the PMF and the short duration of flooding.

Stormwater

The Report sets out a recommended stormwater management measures and Water Sensitive Urban Design approach for the site.

The preliminary stormwater management plan for the site includes on-site detention and water quality measures including a rainwater tank. The proposal accommodates a below ground tank outside the extent of basement car park with separate chambers which is of sufficient size to accommodate the combined OSD, water quality measures and rainwater tank.

The site falls in a northerly direction towards Jacques Street, and discharges to Jacques Street via a kerb outlet or direct connection to an existing kerb inlet pit may also be possible.

The proposal can comply with Randwick City Council's Private Stormwater Code 2013 which includes requirements for On-site Stormwater Detention (OSD), Water Quality (WQ) and Water Conservation (i.e. utilisation of Rainwater Tanks).

A detailed stormwater management plan will be prepared at DA stage.

9.3.10 Acoustic impacts

An Acoustic Assessment has been prepared by BGMA at Appendix I to support the Planning Proposal.

The assessment identified that the site is impacted by traffic noise on Bunnerong Road, aircraft noise being located between the 20 and 25 ANEF contour associated with the Sydney Airport and potential noise emissions from nearby electrical transformers.

The Acoustic Assessment notes that the noise sources are transient and or of limited duration and can be mitigated through the design and construction measure. The assessment describes construction materials and glazing that can be used to reach acceptable noise levels for apartments.

A detailed acoustic assessment will be prepared at DA stage which will identify specific construction specifications to address the relevant noise criteria.

9.3.11 Electromagnetic impacts and fire safety

An Electromagnetic Field (EMF) Impact Assessment at Appendix K has been prepared by Webb Australia Group to support the Planning Proposal.

The site is adjacent to Ausgrid's Kingsford Zone Substation (to the north and east) and associated underground cables which are located around all site boundaries.

EMF readings were taken at selected areas across the site to determine the EMF levels from the substation and associated cables.

The assessment determined that EMF readings were safe and below reference levels across the whole site there is no requirement from an EMF perspective to have any setback distance from any boundary.

A Fire Engineering Report was also prepared by AED Group (Appendix L) to investigate the required distance to the electrical substation and transformers to the north. It concluded that a minimum of 7.5m from the substation structure (that is the line of the boundary) would be capable of complying with the National Construction Code.

From a fire safety perspective, a zero setback to the northern boundary is acceptable. The proposal includes a setback of 6m from the eastern boundary which is acceptable from a fire safety perspective.



Q9. Has the Planning Proposal adequately addressed any social or economic effects?

9.3.12 Economic impact

The Planning Proposal is expected to have a positive economic impact through the generation of construction jobs in the short term. Further, the increased supply of housing, including social housing, within close proximity of the Sydney CBD and accessible to a wide range of jobs, services, and facilities is expected to provide an economic benefit.

9.3.13 Social impact

The Planning Proposal is expected to provide a positive social impact, through the delivery of a high-quality development providing increased housing supply, including social housing, within an accessible location.

A Social Impact Assessment has been prepared by Hill PDA and is provided at Appendix M.

The proposal will have an overall positive social impact, delivering a significant increase in social housing on site, providing housing that matches housing need and ensuring new apartments are fit for purpose and built to contemporary amenity and accessibility standards.

The relocation of existing tenants will be managed in accordance with the NSW Government's Strategic *Tenant Relocations Policy* to ensure that any potential impacts to existing residential are appropriately managed and mitigated.

The relocations policy aims to mitigate potential impacts on existing residents and ensure an appropriate transition and relocation plans are in place for all tenants.

Tenants are supported throughout the entire relocation process by a DCJ Relocations Officer. A dedicated DCJ Relocations Officer will meet with each tenant to talk to them about the relocations process and during this process, tenants can tell the DCJ Relocations Officer about their individual housing and support needs.

Tenants will generally be relocated to alternative accommodation in the local area and will be supported throughout the process including assistance to move and relocate and access and referrals to support services.

Q10. Is there adequate social infrastructure for the Planning Proposal

9.3.14 Social infrastructure

Yes, the site is well serviced by existing social infrastructure and open space and is not likely to generate the need for additional social infrastructure. The proposal is located in area close to open space, schools, and local services.

The site is located in Kingsford in inner south-east Sydney, within walking distance of public transport including high frequency bus services on Bunnerong Road and light rail services at Kingsford Junior Light Rail stop, and services and facilities including Kingsford town centre, open space, and local schools.

The site is serviced by extensive open space areas and meets the criteria for access to local, district and regional open space as established in the NSW Government Architect draft Design Guide.

The site is within 100m of Daceyville Gardens a large one-hectare local open space, it is within 600m or 10-minute walk to Rowland Park, which is approximately 7 hectares and provides district



and regional level open space including sports fields, a children's playground and outdoor gym equipment.

The site is also within 600m of a range of recreation and sporting facilities at the UNSW David Phillips Sports Field. The site is also within 800m of Paine Reserve a 2.5-hectare district level open space which includes play equipment, a dog park and sports fields.

Contributions would also be provided towards local and state infrastructure, including community facilities and open space, as part of future development.

10 Consultation

10.1 Randwick Council consultation

The Planning Proposal has been informed by consultation with Randwick Council.

Pre-lodgement consultation has been undertaken with Randwick Council to inform the Planning Proposal. Refer to a copy of Council's pre-lodgement advice at Appendix N.

A summary of the comments provided by Council and response is provided in Table 9.

 Table 9 Pre-lodgement comments and responseTable 1: Consideration of Eastern City District Plan

Council comment	Response
 Prior to lodgement of the Planning Proposal the following overriding matters should be addressed: Preparation of a community engagement plan, detailing how key stakeholders and the community will be consulted and given the opportunity to provide feedback on the proposal. Preparation of a Social Impact Assessment with recommendations incorporated into the Planning Proposal and community engagement plan. Submission to Council of details on how the existing community will be re-housed within the local area and be provided with the opportunity to return once new homes are completed. 	A detailed community engagement plan will be prepared by Homes NSW prior to exhibition. Social impacts and tenant relocations is addressed in Section 9.3.13. A Social Impact Assessment is provided at Appendix M.
Increased provision of social/affordable housing should be a primary driver of the site's redevelopment. Council recommends that the proportion for social and affordable housing should exceed 50% of dwellings for this site.	The proposal will include up to 50% social and affordable housing. The proposal will ensure no net loss of social housing on the site and seeks to maximise proportion of social and affordable housing, up to 50% social and affordable housing.
The proposal should provide clarity on the details (bedroom numbers, size of dwellings, etc) for each component of the redevelopment- social, affordable and market housing.	To be addressed at DA stage
Recently gazetted planning changes to the broader Kingsford South HIA have been subject to extensive urban design testing, modelling and community feedback. The proposed increase in height from five storeys (16.5m) and 1.6:1 FSR that applies to the precinct, to 8 storeys and 2.77:1 FSR, is significant, and will have a visual impact as experienced from the adjoining streets. Further justification is needed for the increase in building height and FSR.	Addressed in Urban Design Report at Appendix C.
Further visual assessment is required, with existing and proposed street eye level photomontages prepared to assess the visual impact	Visual assessment provided in Urban



of the proposed redevelopment from relevant street vantage points, and with the proposal set within the context of the existing streetscape landscaping, including the existing street trees, the trees retained on the site, and the proposed new landscaping to holistically assess the level of visual impact that would result.	Design Report at Appendix C.
It is recommended that clear justification be provided for the proposal including consideration of further mitigation of the building height and massing by introducing a setback of 2m of the top level of the eight storey wings of the building, to further articulate the top of the building, and to reduce the apparent scale/height of the building when viewed from the adjoining streets.	The proposal includes a 2m upper level setback.
Council notes efforts in the design of the building to mitigate the proposed increase in height by introducing a 16m landscape setback to Bunnerong Road (to retain three existing trees) and including a step down in height to five storeys along Anderson Street, the most sensitive interface of the redevelopment with surrounding low scale residential properties.	Noted.
The shadow diagrams provided indicate that the proposed height of 8 storeys will be overshadowed (at winter solstice 12noon-2pm) the north gardens of residences along Anderson Street. Setting back the top level of the 8 storey building wings along this frontage is highly recommended, as this would reduce the extent of overshadowing and resultant impact on residents along the south side of Anderson Street. The proposal should aim to ensure no additional overshadowing of properties to the south.	The proposal includes varied upper-level setbacks to Anderson Street to minimise overshadowing to adjoining properties. Refer to shadow analysis in the Urban Design Report at Appendix C.
The vehicular/service access on the basement plan appears to indicate access off Bunnerong Road, whilst the Traffic report recommends access from Anderson Street. As Bunnerong Road is a state road, TfNSW are unlikely to approve vehicular access from this main road. Vehicular access from Anderson Street, set back from the intersection is preferred.	Access is proposed from Anderson Street. No access is proposed from Bunnerong Road.
The proposal should address how the open space needs of the community will be provided for in the new development, including connections to existing open space in the area and proposals to augment/complement existing open space on the Energy Australia site if practicable. In this regard Council's open space planning objectives contained in the Randwick LEP should be addressed.	The proposal is located within walking distance to local and regional open space and achieves the benchmark criteria for access to open space as outlined in the GANSW Draft Greener Places Design Guide. The proposal provides significant communal space at ground level, which will also provide for a range of uses for residents.
	has been undertaken



Т

	with Ausgrid to consider the potential opportunities to embellish the adjacent green space. Given current operational requirements, the use of this space for public open space is currently limited and further consultation with Ausgrid is required.
Provide details on the retention of the four trees on the site and the integration in the site planning as part of a detailed landscape plan for the site.	Address in Arboricultural Impact Assessment at Appendix E.
The proposed 'U' shaped building massing effectively defines the two street frontages, accommodates a setback for the retention of three high value trees and effectively defines the COS that embraces the north aspect and adjoining green space	Noted
The COS has the potential to provide a social meeting place for residents, an attractive landscaped outlook for the apartments in the two building 'wings', and has the potential to linkup visually with the existing green spaces to the north	Noted
Placing the carparking/servicing in a basement, configured to preserve deep soil for the COS is supported by Council.	Noted
Further articulation of the overall building massing into a series of building parts at different heights and incorporating steps and recesses in the built form will assist in articulating and breaking down the scale of the redevelopment.	To be addressed at detailed design / DA stage.
Further development of the secondary elements and architectural details, and investigation into a suitable material and finishes palette for the building is encouraged in the next design iteration.	Building design is addressed in draft DCP amendment at Appendix B.
The proposed 6m east boundary setback and the 5m (6m is recommended) setback to the two street frontages, introduces the opportunity for the ground floor apartments to incorporate and open out to private court gardens – introducing additional amenity for ground floor residents (particularly families) and improved passive surveillance for the streets. The RDCP 2013 requirements for residential fencing should be followed in this regard.	The proposal and site- specific DCP encourages ground floor apartments along Bunnerong Road and Anderson. Detailed design of apartments and fencing be addressed at DA stage, noting the Randwick DCP will apply to future development.
The proposed apartment/lift core planning - with four cores serving 6- 7 apartments each, has the potential to set in place a framework for	Noted. To be addressed at DA stage.

small group socialising and providing a sense of ownership (defendable space) within the overall building. Ideally each of the four groupings would also have a street address/entry point – the social housing group at the rear of the property might need replanning in this regard.The car and bicycle parking rates that apply to the site are contained in Table 3 and 4 (P92/93) of section 19 of the Randwick Development Control Plan – E7 Housing Investigation Areas. Due to the proximity of the HIAs to public transport, these minimum rates are one-third less than the standard TfNSW rates.The parking rates in section 19 of the Randwick Development Control Plan – E7 Housing Investigation Areas. Due to the proximity of the HIAs to public transport, these minimum rates are one-third less than the standard TfNSW rates.The parking rates in section 19 of the Randwick DCP E7 HiAs section '18. Landscape' that requires: 60% Gross landscape area 35% Deep soil permeable area 25% Tree canopy coverSite-specific landscaping provisions included in th draft DCP amendment a Appendix B.EV charging, car share and Green Travel Plan requirements for new development are also contained in section 19 of the Randwick DCP E7 HIAs.Noted. Opportunities for roof top communal open space identified.In addition to the ESD Scientific proposed ESD/energy saving measures, the project should satisfy the requirements of Randwick DCP E7 HIAs, section '20. Sustainability'(P95-97), including: • Minimum 4 Star Green Buildings certification rating (GBCA) • performance • Minimum 3 year 100% renewable power contract (Aust. Gov.To be addressed at DA stage.
 in Table 3 and 4 (P92/93) of section 19 of the Randwick Development Control Plan – E7 Housing Investigation Areas. Due to the proximity of the HIAs to public transport, these minimum rates are one-third less than the standard TfNSW rates. The proposal is required to be compliant with Randwick DCP E7 HIAs section '18. Landscape' that requires: 60% Gross landscape area 35% Deep soil permeable area 25% Tree canopy cover There is an opportunity to complement the ground level COS with a landscaped roof level with communal BBQ and shaded relaxation spaces with district views (for social/affordable and market residents) EV charging, car share and Green Travel Plan requirements for new development are also contained in section 19 of the Randwick DCP E7 HIAs. In addition to the ESD Scientific proposed ESD/energy saving measures, the project should satisfy the requirements of Randwick DCP E7 HIAs, section '20. Sustainability'(P95-97), including; Minimum 4 Star Green Buildings certification rating (GBCA) performance
HIAs section '18. Landscape' that requires: 60% Gross landscape area 35% Deep soil permeable area 25% Tree canopy coverprovisions included in th draft DCP amendment a Appendix B.There is an opportunity to complement the ground level COS with a landscaped roof level with communal BBQ and shaded relaxation spaces with district views (for social/affordable and market residents)Noted. Opportunities for roof top communal open space identified.EV charging, car share and Green Travel Plan requirements for new development are also contained in section 19 of the Randwick DCP E7 HIAs.Addressed in Traffic Report at Appendix G.In addition to the ESD Scientific proposed ESD/energy saving measures, the project should satisfy the requirements of Randwick DCP E7 HIAs, section '20. Sustainability'(P95-97), including: Minimum 4 Star Green Buildings certification rating (GBCA) performanceSustainability To be addressed at DA stage.
 landscaped roof level with communal BBQ and shaded relaxation spaces with district views (for social/affordable and market residents) EV charging, car share and Green Travel Plan requirements for new development are also contained in section 19 of the Randwick DCP E7 HIAs. In addition to the ESD Scientific proposed ESD/energy saving measures, the project should satisfy the requirements of Randwick DCP E7 HIAs, section '20. Sustainability'(P95-97), including: Minimum 4 Star Green Buildings certification rating (GBCA) performance To section '20. Sustainability'(P95-97), including: Minimum 4 Star Green Buildings certification rating (GBCA)
development are also contained in section 19 of the Randwick DCP E7 HIAs.Report at Appendix G.In addition to the ESD Scientific proposed ESD/energy saving measures, the project should satisfy the requirements of Randwick DCP E7 HIAs, section '20. Sustainability'(P95-97), including: • Minimum 4 Star Green Buildings certification rating (GBCA) performanceTo be addressed at DA stage.
 measures, the project should satisfy the requirements of Randwick DCP E7 HIAs, section '20. Sustainability'(P95-97), including: Minimum 4 Star Green Buildings certification rating (GBCA) performance
 Infinite of year 100 % renewable power contract (Aust. Gov. endorsed) 100% electric development (no natural gas) PV rooftop solar and battery storage (for communal and individual use) LED lighting, rainwater tanks, good insulation Clothes drying areas Energy efficient fittings and systems Storage and sorting for E-waste, clothing, hazardous waste, bulky waste FOGO storage/handling Localised automated waste collection (as per Council's Automated Collection System Guidelines) Light coloured roof finishes Passive and low-tech solutions are encouraged to manage solar access, heat load and cross ventilation – shading of windows with overhangs/shading blades, minimising west facing openings, providing ceiling fans in apartments
Adequate setback from the root ball/drip zone of the four retained trees on the site to the proposed building structures, such asAddressed in Arboricultural Impact



basement carparking levels, requires detailed arborist advice and consideration in the design development.	Assessment at Appendix E.
All components of the development need to be architecturally integrated, with a similar quality of finish, within the holistic expression of the building – the design should avoid an institutional appearance or a discernible lower level of finish for the social/affordable housing component of the development	Addressed in draft DCP provisions at Appendix B.
A desktop review of flood mapping (1in100 and PMF) appears to indicate that the flood impacts on the site are not at the high Hydraulic Hazard level and there are no overland flow paths, none- the-less a site-specific detail flood assessment should be undertaken to ascertain appropriate building ground floor levels and basement vehicular entry ramp threshold requirements.	Addressed in Flood Impact Assessment at Appendix J.
The Randwick 7.12 Contribution Plan is applicable to the development, requiring a contribution of 1% towards infrastructure for the 'to-market' residential component of the development (the social/affordable component being exempt under the Plan).	Noted. Contributions to be levied at DA stage.

10.2 State and Commonwealth agency consultation

Q11. What are the views of the State and Commonwealth public authorities consulted in accordance with the Gateway determination

Consultation will be carried out with relevant State and Commonwealth public authorities following a Gateway decision. Further, consultation will also be carried out with the community at this stage, through public exhibition of the Planning Proposal.



11 Project timeline

An indicative project timeframe is set out in Table 10 below.

The timeframes are consistent with the assessment process timeframes outlined in the *Prioritising rezonings that deliver social and affordable housing, Program Guideline May 2024.*

Table 10: Anticipated project timeline

Task	Timing
Lodgement of Planning Proposal	September 2024
Review of Planning Proposal	November 2024
Exhibition of Planning Proposal	December 2024
Response to Submissions	March 2025
Finalisation by DPHI	June 2025

12 Conclusion

The Planning Proposal seeks to facilitate renewal of a large site, in an area undergoing significant renewal and transformation to deliver increased housing supply and improved urban design outcomes.

The Planning Proposal seeks to facilitate renewal of the site to increase housing supply and deliver improved landscaping and design outcomes that will integrate the site into the surrounding area and planned development in the Kingsford South HIA.

The planning proposal will deliver increased housing supply, new and improved social housing, and more diverse housing options, consistent with State and local government objectives to increase the supply of housing, including social housing, in accessible locations.

The proposal is also consistent with the Randwick Local Strategic Planning Statement and Local Housing Strategy which identify the site within a housing growth area and establish the need for increased housing close to transport and services.

The reference scheme demonstrates the site can accommodate a built form outcome which responds to the surrounding context, provides a transition to the surrounding uses and heritage conservation areas, and ensures excellent amenity for buildings on the site and surrounding properties.

The proposal will enhance the local area through responsive and contextual built form which responds to the existing and planning built form context. The proposal provides a transition to lower-scale residential areas and the Daceyville heritage conservation areas, while responding to the planned mid-rise residential in the Kingsford South HIA and the high-density mixed-use buildings to the north of the site in the Kingsford town centre.

The proposed built form has been located to ensure significant trees along Bunnerong Road and Anderson Street can be retained. This is supported through increased setbacks to accommodate tree protection zones and to provide opportunities for additional planting, whilst maintaining solar access to neighbouring properties. Additional street trees are proposed along all street frontages, with proposed landscaping within the site providing an appropriate level of canopy cover across the site and surrounding streets.

The Planning Proposal is supported by technical studies which conclude that the proposal will have minimal impact on the surrounding area and that all issues associated with the proposal can be appropriately managed.

In conclusion the proposal provides an appropriate response to the local context and will deliver significant public benefits through increased housing supply, more diverse housing, and renewed social housing in walking distance to public transport, jobs and services.

Appendix A Consideration of E7 HIA DCP

Clause	Provision	Compliance	
	Part A Overarching Controls		
	Design Excellence		
3 (a)	All new development involving the construction of a new building or external alterations to an existing building is to demonstrate design excellence (in accordance with Clause 6.11 in the LEP)	Design excellence to be demonstrated in future development applications. To be addressed at DA stage.	
3 (b)	Buildings are to be designed to demonstrate at least 4-Star Building Standard certification rating (GBCA) performance	To be addressed at DA stage.	
	Built Form		
5(e)	The maximum number of storeys on a site is to comply with the following: on sites with a maximum of 16.5m and 17.5m - 5 storeys on sites with a maximum of 19.5m - 6 storeys on sites with a maximum of 24 - 7 storeys on sites with a maximum of 26 - 8 storeys	Maximum height in storeys addressed in draft DCP for the site.	
5 (f)	Where a property is identified by Council to be subject to flooding, this may require a ground floor habitable space to be raised above the existing ground level (above the 1 in 100 year flood level, plus free board). The additional height should be absorbed into the overall height of the building, whilst continuing to meet ADG floor to ceiling standards and the required LEP maximum height of building level.	Addressed in flood impact assessment. The proposal can accommodate floor levels above the PMF.	
5 (j)	The residential component of a development is to have a maximum building depth of 20m, including balconies. A maximum building depth of 22m, may be permitted on merit, subject to ADG compliance.	Reference scheme complies with maximum building depth.	
6(b)	Where new through site links are proposed (in addition to those required), the consent authority is to consider the need for and desirability of the links or connections having regard to the objectives of this section	No through-site links proposed. The site is a corner site and through site link is not required.	
6(b)	Through site links and mid-block connections are to have an easement for public access on title or covenant on title unless identified for dedication to Council	Not applicable.	

6(d)	Through-site links/ mid-block links are to be designed to:	No through-site links proposed. The site is a corner site and
	 Have a minimum width of 6m, and be open to the sky 	through site link is not required.
	Be direct and publicly accessible 24 hours a day	
	 Allow visibility along the length of the link Be easily identified by users and have a public character Include signage advising of the publicly 	
	accessible status of the link and the places to which it connects	
	 Be clearly distinguished from vehicle accessways 	
	 Align with breaks between buildings so that views are extended and there is less sense of enclosure 	
	 Provide opportunities for passive surveillance from existing and proposed development 	
	 Include materials and finishes (paving materials, tree planting, furniture etc.) integrated with adjoining streets and public spaces and be graffiti and vandalism resistant 	
	 Ensure no structures (for example, electricity substations, carpark exhaust vents, swimming pools, etc) are constructed in the through-site link Include landscaping to provide shade and assist in guiding people along the link 	
	 while enabling long sightlines Consider the privacy of existing adjoining development indoor and outdoor living spaces. 	
	Heritage conservation	
8(a)	All development involving or in the visual catchment of heritage items are to be planned and designed in accordance with the requirements of <i>Section B2 Heritage</i> of the Randwick DCP	Addressed in Heritage Impact Statement and to be addressed in future DA.
8(c)	Development located within the vicinity of another Local Government Area (LGA) requires the preparation of a HIS to address the potential impact on adjoining or nearby heritage items or HCAs in the adjoining LGA	Daceyville HCA is located in Bayside LGA. Addressed in Heritage Impact Statement.
	Part B Site Specific Contro	ls
	Built form	



	Provide variety and interest in the streetscapes through the design of buildings that are articulated within the overall permitted development envelope	The reference scheme provides a highly articulated and varied built form that responds to each street edge and interface.
	Setback buildings in Zone R3 5m along primary and secondary street frontages to provide private and communal garden areas and to maintain mature trees and vegetation	Setback controls included in site-specific DCP controls for the site.
	Public domain and access	
9.4.4	In the long term, upgrade Jacques Street Park to facilitate local recreation and outdoor activities.	Potential long-term upgrade to open space subject to discussion with Ausgrid and Council.
	Part C Design Detail	
	Housing Mix	
10 (a)	Development is to comprise a mix of apartment types, where gardens, adaptability and accessibility are more easily achievable for elderly people, families with children, or people living with disabilities	To be addressed at DA stage.
10(b)	At least 20% of the total number of dwellings (to the nearest whole number of dwellings) within a development are to be self-contained studio dwellings or one-bedroom dwellings, or both	Housing mix to be determined at DA stage based on housing demand and local needs.
10(c)	At least 20% of the total number of dwellings (to the nearest whole number of dwellings) within a development are to be three or more-bedroom dwellings	As above
10(d)	At least 20% of the total number of apartments of three bedrooms or more are to be located on the lower floors of the building	As above
10(e)	Family friendly apartments should be located at the ground and podium levels to utilise larger terrace areas for play, and in positions with direct sightlines of Communal Open Space for parental supervision.	As above
	Floor to ceiling heights	
11 (a)	Minimum floor-to-ceiling heights (in accordance with the ADG) are to be provided as follows: i) Ground Floor – 3.3m ii) First Floor and above – 2.7m	Reference scheme includes minimum floor to ceiling heights in accordance with DCP.

11(b)	The floor-to-floor height of residential building levels should be 3.1m, unless detailed cross sections and engineering justifications are provided that establish the feasibility of a lesser height.	Reference scheme includes minimum floor to floor heights in accordance with DCP.
	Solar and daylight access	
12(a)	Development is to be designed and constructed to reduce the need for active heating and cooling systems by incorporating passive design measures through site planning and building design	Reference scheme demonstrates compliance with solar access and cross ventilation criteria in the ADG.
12(b)	 Development is to be orientated to achieve optimum solar access and natural ventilation. To achieve this: Shade north facing windows from direct summer sun with external horizontal shading devices such as awnings, upper floor balconies, eaves and overhangs Utilise vertical shading devices such as vertical louvres or fins on east and west facing windows that consider the oblique angles of the sun. 	To be addressed at DA stage.
12(c)	Solar access is to be provided in accordance with the recommendations of PART 4 of the Apartment Design Guide (ADG)	Reference scheme demonstrates compliance with solar access criteria in the ADG.
12(d)	Buildings must ensure that areas of private or public open space are oriented to achieve the ADG recommended level of solar amenity	Reference scheme demonstrates compliance the requirements of the ADG.
	Acoustic amenity	
13(a)	All new development is to be constructed to achieve the following acoustic amenity criteria for the residential component of the building in accordance with Australian Standard AS 2107:2016 based on an acoustic report	To be addressed at DA stage.
13(b)	 In naturally ventilated spaces for the residential component, the repeatable maximum Leq (1hour) should not exceed: 35 dB(A) between 10.00 pm and 7.00 am in sleeping areas when the windows are closed 40 dB(A) in sleeping areas when windows are open (24 hours) 45 dB(A) in living areas (24 hours) when the windows are closed 50 dB(A) in living areas (24 hours) when the windows are open. 	As above.

13(c)	 Where natural ventilation cannot achieve the criteria above, the development is to include mechanical ventilation, air conditioning or other complying means of ventilation (in accordance with the ventilation requirements of the Building Code of Australia and Australian Standard AS 1668.2-2012), when doors and windows are shut. In such circumstances the repeatable maximum Leq (1hour) with the alternative ventilation operating should not exceed: 38 dB(A) between 10.00 pm and 7.00 am in sleeping areas 46 dB(A) in living areas (24 hours) 45 dB(A) in sleeping areas between 7.00 am and 10.00 pm. 	To be addressed in future development applications.
13(d)	 All development is to be designed to minimise noise transition between apartments by adopting general noise concepts of: Locating busy, noisy areas next to each other and quieter areas next to other quiet areas, for example, living rooms next to living rooms, bedrooms with bedrooms Locating bedrooms away from busy roads and other existing or potential noise sources Using storage or circulation zones within the apartment to buffer noise from adjacent apartments, mechanical services or corridors and lobby areas Minimising the amount of party (shared) walls with other apartments. 	To be addressed in future development applications.
13 (f)	Conflicts between noise, outlook and views are to be resolved using design measures such as double glazing, operable screening and ventilation taking into account noise targets for habitable rooms	To be addressed in future development applications.
13(k)	A noise and vibration assessment report, prepared by an appropriately qualified acoustic consultant/engineer, is to be submitted with DAs for residential development	Acoustic assessment demonstrates future development is capable of complying with required noise criteria. Detailed acoustic assessment to be undertaken at DA stage.
	Natural ventilation	
14(a)	All buildings are to be designed to comply with the ADG to maximise opportunities for natural ventilation and solar access by providing a combination of: - corner apartments - dual aspect apartments	Reference scheme demonstrates the proposal is capable of complying with key design criteria in the ADG.

	 shallow, single-aspect apartments openable windows and doors other ventilation devices 	
14(b)	Window placement, size, glazing selection and orientation are to maximise opportunities for cross ventilation and capturing prevailing breezes in summer	To be addressed at DA stage.
14(c)	Internal corridors, lobbies, communal circulation spaces and communal areas shall incorporate adequate natural ventilation	Reference scheme provides for naturally ventilated lobbies and corridors.
14(d)	Basements levels, including spaces used for storage, garbage areas or commercial activities, are to be designed to include natural ventilation wherever possible	To be addressed at DA stage.
14(e)	Apartment configuration and apartment depth is to be limited to maximise the opportunity for cross ventilation and airflow	Reference scheme demonstrates proposal can comply with maximum building depth in ADG.
	Articulation and modulation	Ì
15(a)	All buildings are to provide articulation by incorporating a variety of window openings, balcony types, balustrades, fins, blade walls, parapets, sun-shade devices and louvres to add visual interest and light and shade to the façade	To be addressed at DA stage.
15(b)	The design of buildings should include modulation to a similar rhythm as the historical subdivision pattern of the site	The reference scheme provides a high-quality design that includes varied and generous setbacks that respond to the surrounding context.
15(c)	The design of buildings are to avoid large areas of blank walls. Where blank walls are unavoidable, they must be treated and articulated to achieve an appropriate presentation to the public domain	The reference scheme does not include blank walls.
15(d)	Building articulation should respect and complement the adjoining built form and contribute positively to the streetscape	The reference scheme provides a high-quality design that includes varied and generous setbacks that respond to the surrounding context.
15(e)	Corner buildings are to be expressed by giving visual prominence to elements of the façade eg a change in building articulation, material or colour, roof expression or increased height	The reference scheme responds to the corner site location with a design response that incorporates varied setbacks and articulated built form that addresses each street frontage.

15(f)	Corner buildings should be designed to add variety and interest to the street and mark an important junction in the urban fabric.	To be addressed at detailed DA stage.
	Building awnings, entry and circu	lation
17(a)	Design building entry points to be clearly identifiable and visible from the public domain, provide shelter from elements and assist in defining public and private space	Reference scheme provides for highly visible building entries from the street.
17(b)	Provide clear sightlines into and out of building entries (consider CPTED)	The reference scheme provides for highly visible sight lines from building entries to the street.
17 (c)	Building entry points and circulation spaces should be naturally lit and have a source of natural ventilation	Reference scheme provides for naturally ventilated entrances and lobbies.
17(e)	Where ground floor dwellings face street frontages, encourage individual entrances to assist in modulating of the building frontage and to improve passive surveillance.	To be addressed at DA stage.
	Landscape area	
18(a)	The minimum Gross Landscape Area, Deep Soil Permeable Area and Tree Canopy Cover must be met for development proposals as follows:	Appropriate site-specific landscape controls included in site-specific DCP.
	 Kingsford South: Gross landscape area – 60% Deep soil – 35% Tree canopy – 25% 	
18(b)	Green walls can only contribute up to 10% of the total gross landscaped area	Appropriate site-specific landscape controls included in site-specific DCP.
18(c)	Deep soil permeable surfaces must have a width of not less than 900mm	Deep soil areas to be provided in accordance with the ADG.
18(d)	Native species must comprise at least 50% of the plant schedule, incorporating a mix of locally indigenous trees, shrubs and groundcovers appropriate to the area and surrounds	To be addressed at DA stage.
18(e)	Rooftops may include communal food farms and food production areas	The proposal provides the opportunity for rooftop green space. To be addressed at DA stage.
18(g)	Where green roofs and green walls are provided, these shall comply with requirements contained in Chapter 4 of <i>Section B4</i>	To be addressed at DA stage.

	<i>Landscaping and Biodiversity</i> of the Randwick DCP	
18(j)	A minimum of one indigenous canopy street tree that will attain a minimum mature height of 6m, must be planted at maximum spacing of 7.5m, at a minimum distance of 600mm from the kerb and/or footpath, and/or masonry fence or retaining wall.	To be addressed in detailed landscape concept at DA stage.
	Transport, parking and acces	SS
19(a)	Bicycle parking to be provided at the rate of 1 space per dwelling and 1 space per 10 for visitors	Reference scheme includes indicative basement layout that is capable of complying with bike parking rates.
19(b)	At least 25% of bicycle parking spaces should be E-bike charging capable (not elevated rack storage) with suitable power outlets.	To be addressed at DA stage.
19(c)	Car parking to be provided in accordance with minimum rates: • Studio – 0.2 spaces • 1-bedroom – 0.6 spaces • 2-bedroom – 0.8 spaces • 3+ bedroom – 1.1 spaces • Visitor - 0.2 spaces per dwelling	Proposal complies with the car parking rates in the DCP.
19(d)	Development must provide one electric vehicle charging point per five car parking spaces and demonstrate appropriate electrical infrastructure and capacity for the remaining Lot Owners (Eligible Lot Owner) to install a vehicle charging point at a later date.	To be addressed in future development applications.
19(e)	Development must install appropriate electrical infrastructure and capacity to allow at least 20% of Lot Owners (Eligible Lot Owner) to charge an electric vehicle at any one time in their own car space.	To be addressed in future development applications.
19(d)	Where practical, parking access and / or loading is to be provided from secondary streets	Access is proposed from Anderson Street.
19(f)	A Green Travel Plan is required to accompany all DAs for new buildings	Green Travel required future development applications.
19(g)	Parking access and / or loading must be setback at least 6m from an intersection or rear lane boundary to avoid vehicle queuing across footpaths and in roadways	To be addressed at DA stage.
19(h)	Parking access and / or loading areas are to be designed as recessive components of the	Proposed access is from Anderson Street and located to

	building elevation to minimise the visual impact on the streetscape.	minimise visual and streetscape impacts.	
19(i)	Parking is to be accommodated underground where possible	Basement parking provided in reference scheme.	
19(j)	Sub-basement car parking is to be no more than 1.2m above existing ground level	Parking proposed below ground.	
Sustainability			
20(a)	All developments with a cost of works of \$3 million or greater are to achieve a minimum 4 Star Green Buildings certification rating	To be addressed at DA stage.	
20(b)	All development must address the requirements of Section B3 – Ecologically Sustainable Development of the Randwick DCP	To be addressed at DA stage.	
20(c)	All development is encouraged to incorporate PV rooftop solar and battery storage for the capture and use of energy for lighting, ventilation and services within communal spaces and for residential apartments	To be addressed at DA stage.	
20(d)	Where photovoltaic (PV) panels are proposed it is desirable that the panels be parallel and incorporated into the design of the building	To be addressed at DA stage.	
20(e)	All development must address the requirements of <i>Section B6 Recycling and Waste</i> <i>Management</i> of the Randwick DCP	To be addressed at DA stage.	
20(f)	All new buildings are to provide a space for storage and sorting of problem waste such as E- waste, clothing, and residential hazardous waste	To be addressed at DA stage.	
20(g)	All development is to incorporate a localised automated waste collection system in accordance with Council's Automated Collection System Guidelines	To be addressed at DA stage.	
20(h)	All new development is to be 100% electric (no natural gas)	To be addressed at DA stage.	
20(m)	An internal bulky waste storage area of 20sqm is to be accommodated on the property for temporary storage of periodic bulky waste collection.	To be addressed at DA stage.	
20(r)	Car share provision within a development is encouraged and HIA car parking rates can be further reduced when car share spaces are provided.	To be addressed at DA stage.	
Water management			



21(a)	Dual piping for future use of greywater or blackwater systems is encouraged to be provided in all new multi-unit residential development.	To be addressed in stormwater management strategy at DA stage.	
21(b)	All development or substantial alterations to existing buildings must address Section B8 – Water Management of the Randwick DCP in relation to water conservation, groundwater and flooding, overland flow paths, on-site detention and Water Sensitive Urban Design (WSUD)	To be addressed in stormwater management strategy at DA stage.	
21(c)	The ground level of a development is to be constructed above the stipulated 1 in 100 year flood level plus freeboard.	The minimum floor levels are located above the PMF level.	
Affordable Housing			
23 (a)	All development within the HIAs must contribute towards the provision of affordable housing at a contribution rate of 3%.	Affordable housing contrition to be met through provision of social and affordable housing on site. The proposal will provide up to 50% social and affordable housing.	

Appendix B Draft site-specific DCP

Appendix C Urban Design Report

Appendix D Landscape Concept Report



Appendix E Arboricultural Impact Assessment

Appendix F Heritage Impact Statement

Appendix G Traffic and Transport Assessment

Appendix H Ecological Sustainable Development Report

Appendix J Acoustic Assessment



Appendix K Assessment

Flooding and Stormwater

FPD Planning



Appendix L Electromatic Magnetic Field Assessment



Appendix M Fire Engineering Report

Appendix N Social Impact Assessment



Appendix O Randwick Council Pre-lodgement letter