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23 November 2023

Ref No: F2020/00512

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on behalf of:

NSW Land and Housing Corporation (LAHC)
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Michael (and Katrina),

47-55 Bunnerong Road, Kingsford – LAHC Site

The following preliminary feedback is provided by Randwick City Council officers regarding the subject site based on the review of the drawing package provided by LAHC: *47-55 Bunnerong Road, Kingsford – Preliminary Draft Report (Rev01 26 Sept 2023)* and the briefing provided to Council officers on 11 September 2023. Please note that there are issues that require further consideration and resolution prior to the planning proposal being formally lodged.

Overview

- Increased provision of social/affordable housing should be a primary driver of the site's redevelopment given the scarcity and cost of inner-city land and the imperative of addressing the critical shortage of social and affordable housing. Council has previously commented on this aspect of the site's redevelopment when it was considered as part of the Comprehensive Planning Proposal (CPP), and this was a key reason for its deferral from the plan.
- 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.

Planning context

- The site is zoned R3 Medium Density Residential. The site was deferred from the recent CPP (Randwick LEP Amendment 9) following public exhibition, and no changes have been made to the existing planning controls
- Adjoining zoning is SP2 (Electricity Substation) to the north and east of site, and Bunnerong Road is to the west
- The maximum HOB is 12m (Kingsford South HIA is to the east and north and is 16.5m – 5 storeys, and low density residential to south is 9.5m – 3 storeys)
- The maximum density is 0.75:1 FSR (Kingsford South HIA to the east and north is FSR 1.6:1, and the low density residential to the south is FSR 0.5:1)
- The site is within an approx. 300m walk of the Juniors Kingsford Light Rail stop and bus interchange
- The site is in convenient walking distance of the Jacques Street local park and Dacey Gardens
- The substation (to the north and east) and Bunnerong Road corridor (to the west) provide a setback 'buffer' from the site to nearby residential properties
- The R2 Low Density Residential area to the south of Anderson Street is the most sensitive interface for the redevelopment to address
- The Randwick DCP E7 HIA objectives and development controls, regarding the planning and building design, are relevant and should be addressed in the proposal. The DCP controls that generally apply across the Kingsford South HIA include:
 - 5 storey height limit for dwellings
 - A 2m setback to the top storey (all around)
 - 6m overall building setback from street boundaries
 - ADG building separation

Draft proposal

- No change to the R3 zoning is proposed
- The proposed FSR is 2.77:1 (Reference Design - Option 4)
- The Reference Design is for 184 apartments (mix of 1 bed (29%), 2 bed (57%) and 3 bed (14%))
- It is proposed to increase the proportion of social/affordable housing in the apartment mix to more than 30% (verbally LAHC has advised that up to 50% is being considered, similar to the LAHC Waterloo project). Currently there are approx. 60 social housing apartments on the site (to be confirmed)
- The Reference Design achieves a 43% social/affordable housing proportion, a net increase in social/affordable housing on the site of 19 apartments (79-60 = 19)
- If an alternative 50/50 split is realised, this would yield: 32 (92-60) net increase in social/affordable dwellings on site – the final split is to be confirmed by LAHC
- A key consideration on this site is maximising the social/affordable housing component on this site in excess of 50%. This matter is addressed below.
- Two 8 storey building wings are proposed, with part 5 storey step down along Anderson Street, and part 16m setback along Bunnerong Road to retain three existing mature trees

- There is a 3m building setback to the north (substation and green space), and a 6m setback to the east (substation)
- The four High Retention Value trees proposed to be retained on the site are:
 - 3 x *Eucalyptus botryoides* (Bangalay along Bunnerong Road)
 - 1 x *Jacaranda mimosifolia* (Jacaranda in NE corner)
 - A replacement ratio of 2:1 is proposed for existing trees removed from the site resulting from the redevelopment
- The scheme provides a Communal Open Space (COS) with a north aspect/outlook
- It is noted that the proposed deep soil zone and the basement are aligned with the COS
- ADG compliance for solar access, cross ventilation and sunlight access to the COS, is indicated as being met in the preferred concept

Council's comments

- Randwick City Council's 2040 Housing Strategy establishes Council's social and affordable housing target of 10% affordable homes by 2036 (3,683 new social and affordable dwellings). This target is comprised of 7.5% social housing (1,918 dwellings) and 2.5% affordable rental dwellings. This site is a rare opportunity, in the Randwick LGA, to deliver new social and affordable housing, and therefore Council recommends that the proportion for social and affordable housing should exceed 50% of dwellings for this site.
- 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
- 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.
- Council notes that the preferred built form Option 4 Reference Design has been devised following an options analysis. However, further visual assessment is required, with existing and proposed street eye level photomontages prepared to assess the visual impact 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.
- 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.
- 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.
- The shadow diagrams provided indicate that the proposed height of 8 storeys will overshadow (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 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.
- 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.
- 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
- 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
- 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 link up visually with the existing green spaces to the north
- Placing the carparking/servicing in a basement, configured to preserve deep soil for the COS is supported by Council
- 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
- 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
- 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 proposed apartment/lift core planning - with four cores serving 6-7 apartments each, has the potential to set in place a framework for 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 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.

- It is important that the planning proposal contains a clear objective and provisions for buildings to achieve best practice environmental standards to meet the future needs of the population. 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. 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 as basement carparking levels, requires detailed arborist advice and consideration in the design development
- 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
- 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.
- 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).

Planning Proposal technical studies

The following technical studies are recommended to accompany the lodgement of the Planning Proposal for the subject redevelopment:

- Planning/Urban Design Report
- ADG and Randwick DCP E7 HIAs compliance check
- Architectural Drawing Set
- Shadow Study
- ESD and Sustainability
- Materials and Finishes Palette
- Visual Assessment
- Eye level street perspectives – key vantage points

- Community Engagement Plan
- Social Impact Assessment
- Landscape Design Report for the site and adjoining Energy Australia site
- Arborist Report
- Transport, Traffic and Parking
- Flood and Stormwater Assessment
- Acoustic Assessment
- Electromagnetic Field (EMF) review

Planning Proposal assessment fees

Please find attached the *Development Applications 2023-2024 Fees and Charges*. Refer to section 6 – PRELODGE MENT ADVICE on page 7 for the applicable fee for the provision of Council prelodgement advice.

The Planning Proposal is assessed to be a Major Planning Proposal - refer to the TOWN PLANNING section on page 10, 1 – Local Environment Plans/Rezoning, (ii) Major Planning Proposal for the applicable fee for Council's assessment, consultation and review of the Planning Proposal.

Also attached is the *Planning Proposal (Rezoning) Application Form* that needs to be completed, signed and lodged with the Planning Proposal.

Consultation with State agencies and Council (initial list - to be confirmed)

Energy Australia (including regarding landscaping of adjoining park areas)

Transport for NSW (RMS)

Heritage NSW

Water NSW

School Infrastructure

Bayside Council

Process/next steps

As advised by LAHC, the preliminary scheme (26 Sept 2023) will be further developed in response to these comments provided by Council, and the concept scheme submitted as part of the Planning Proposal.

Council officers will assess the technical reports and report the draft Planning Proposal to Council in early 2024, and then if endorsed, it will be referred to the Randwick Local Planning Panel (RLPP) for advice.

Please don't hesitate to give me a call (ph: 9093 6954) or David Appleby (ph: 9093 6982) if you have any questions regarding this feedback.

Yours sincerely,



Stella Agagiotis

Manager, Strategic Planning

stella.agagiotis@randwick.nsw.gov.au

<p>English</p> <p>If you need help to understand this letter, please come to Council's Customer Service Centre and ask for assistance in your language or you can contact the Telephone Interpreter Service (TIS) on 131 450 and ask them to contact Council on 1300 722 542.</p>	<p>Greek</p> <p>Αν χρειάζεστε βοήθεια για να καταλάβετε αυτή την επιστολή, παρακαλείστε να έρθετε στο Κέντρο Εξυπηρέτησης Πελατών της Δημαρχίας (Council Customer Service Centre) και να ζητήσετε βοήθεια στη γλώσσα σας ή τηλεφωνήστε στην Τηλεφωνική Υπηρεσία Διερμηνέων (Telephone Interpreter Service — TIS) τηλ. 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία τηλ. 1300 722 542.</p>	<p>Italian</p> <p>Se avete bisogno di aiuto per capire il contenuto di questa lettera, recatevi presso il Customer Service Centre del Municipio dove potrete chiedere di essere assistiti nella vostra lingua; oppure mettetevi in contatto con il Servizio Telefonico Interpreti (TIS) al 131 450 e chiedete loro di mettersi in contatto col Municipio al 1300 722 542.</p>
<p>Croatian</p> <p>Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dođite u Općinski služni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.</p>	<p>Spanish</p> <p>A la persona que necesite ayuda para entender esta carta se le ruega venir al Centro de Servicios para Clientes [Customer Service Centre] de la Municipalidad y pedir asistencia en su propio idioma, o bien ponerse en contacto con el Servicio Telefónico de Interpretes [“TIS”], número 131 450, para pedir que le comuniquen con la Municipalidad, cuyo teléfono es 1300 722 542.</p>	<p>Vietnamese</p> <p>Nếu quý vị không hiểu lá thư này và cần sự giúp đỡ, mời quý vị đến Trung Tâm Dịch Vụ Hướng Dẫn Khách Hàng của Hội Đồng Thành Phố (Council's Customer Service Centre) để có người nói ngôn ngữ của quý vị giúp hay quý vị có thể liên lạc Dịch Vụ Thông Dịch qua Điện Thoại (TIS) ở số 131 450 và yêu cầu họ liên lạc với Hội Đồng Thành Phố (Council) ở số 1300 722 542.</p>
<p>Polish</p> <p>Jeśli potrzebujesz pomocy w zrozumieniu treści tego pisma, przyjdź do punktu obsługi klientów (Customer Service Centre) przy Radzie Miejskiej i poproś o pomoc w języku polskim, albo zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service — TIS) pod numer 131 450 i poproś o skontaktowanie się z Radą Miejską (Council) pod numerem 1300 722 542.</p>	<p>Indonesian</p> <p>Jika Anda memerlukan bantuan untuk memahami surat ini, silakan datang ke Pusat Pelayanan Pelanggan (Customer Service Centre) Pemerintah Kotamadya (Council) dan mintalah untuk bantuan dalam bahasa Anda, atau Anda dapat menghubungi Jasa Juru Bahasa Telepon (Telephone Interpreter Service - TIS) pada nomor 131 450 dan meminta supaya mereka menghubungi Pemerintah Kotamadya pada nomor 1300 722 542.</p>	<p>Turkish</p> <p>Bu mektubu anlamak için yardima ihtiyaciniz varsa, İtiffen Belediye'nin Müşteri Hizmetleri Merkezi'ne gelip kendi dilinizde yardım isteyiniz veya 131 450'den Telefonla Tercüme Servisi'ni (TIS) arayarak onlardan 1300 722 542 numaradan Belediye ile ilişkiye geçmelerini isteyiniz.</p>
<p>Hungarian</p> <p>Amennyiben a levél tartalmát nem érti és segítségre van szüksége, kérjük látogassa meg a Tanácsház Ügyfél Szolgálatát (Customer Service Centre), ahol magyar nyelven kaphat felvilágosítást, vagy hívja a Telefon Tolmacs Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapcsolják a Tanácsházat a 1300 722 542 telefonszámon.</p>	<p>Czech</p> <p>Jestliže potřebujete pomoc při porozumění tohoto dopisu, navštivte prosím naše Středisko služeb pro veřejnost (Council's Customer Service Centre) a požádejte o poskytnutí pomoci ve vaší řeči anebo zavolejte Telefonní tlumočnickou službu (TIS) na tel. číslo 131 450 a požádejte je, aby oni zavolali Městský úřad Randwick na tel. číslo 1300 722 542.</p>	<p>Arabic</p> <p>إذا أردت مُساعدة لفهم هذه الرسالة، نرجوك الحضور إلى مركز خدمة عملاء المجلس وأطلب المُساعدة في لغتك، أو يمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 وأطلب منهم الاتصال بالمجلس على رقم 1300 722 542.</p>
<p>Chinese</p> <p>如果你需要人幫助你了解這封信的內容，請來市政會顧客服務中心要求翻譯服務，或者與電話傳譯服務（TIS）聯繫。號碼是131 450。請他們幫助你打電話給市政會，號碼是1300 722 542。</p>	<p>Russian</p> <p>Если Вам требуется помощь, чтобы разобраться в этом письме, то, пожалуйста, обратитесь в Муниципальный Центр Обслуживания Клиентов и попросите оказать Вам помощь на Вашем языке или же Вы можете позвонить в Телефонную Службу Переводчиков (TIS) по номеру 131 450 и попросить их связаться с Муниципалитетом по номеру 1300 722 542.</p>	<p>Serbian</p> <p>Ako vam treba pomoć da razumete ovo pismo, molimo vas da dođete do Centra za usluge mušterijama pri Opštini (Customer Service Centre) i zamolite ih da vam pomognu na vašem jeziku, ili možete nazvati Telefonsku prevodilačku službu (TIS) na 131 450 i zamolite ih da vas povežu sa Opštinom na 1300 722 542.</p>