

## ATTACHMENT A

### TABLE OF SUMMARISED ISSUES RAISED BY SUBMISSIONS AND RESPONSE

Kensington and Kingsford draft Planning  
proposal post exhibition report

Ordinary Council meeting 10 December 2019

*Note: This table includes a summary of all issues that have been provided in response to the Kensington and Kingsford draft Planning Proposal. To protect the privacy of submissions, names and addresses have been omitted.*

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| Issue   | Response   |
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| <p>The proposed height and bulk of buildings will impact upon the amenity of residents and character of the area.</p>   | <p>The proposed heights and floor space ratio limits proposed within the draft Proposal were developed as part of a comprehensive urban design and built form study undertaken by consultants Conybeare Morrison (CM+). The CM+ study was based on a detailed understanding of the existing built form, urban character and condition of the public domain. The Study identified redevelopment opportunities and constraints and tested scenarios that examined the appropriateness of new controls for the town centres. The aim of the Study was to determine how projected growth in residential and employment floor space could be accommodated, while ensuring a good design outcome and high level of amenity in the town centres. The Council-led international urban design competition provided ideas focussing on sustainability, social benefits and improving the environmental amenity of the public domain.</p> <p>The review established that mid-rise building would provide for a more human scale for the precinct, with higher buildings being located at key intersections where they act to create distinctive urban form and facilitate growth around light rail infrastructure. See Part C, section 5-5.2 for further information.</p> |
| <p>The increase to density will result in increased traffic congestion and loss of parking for surrounding residents.</p>   | <p>The traffic assessment report undertaken for Council as part of the K2K Strategy determined that the anticipated level of traffic and demand for parking from both residential and commercial development will be able to be accommodated in the precinct. Council has obtained further advice (November 2019) from traffic consultants Arup which incorporates new Census data and confirms that assessment and modelling carried out in 2017 for Council remains valid. This work has also shown that there has been a significant drop in car use for both employees and residents in the area. This aligns with the proposed future trend.</p>  |
| <p>Residents and parents are concerned that the proposed heights and density directly adjacent to Kensington Public School will <b>result in impacts to the students' amenity</b> including increased overshadowing, potential for overlooking, urban heat island</p> | <p>In relation to built form, Part C of the Strategy proposes a built form height transition between Anzac Parade and surrounding residential areas. A transition zone between the school site and adjoining sites is proposed, with a laneway to separate the school from adjoining buildings and to provide a north south access way through to Bowral Street. Adjoining the proposed laneway, the maximum building height is 5 storeys, which is the same height under the existing planning controls (Randwick DCP 2013). The maximum building height</p>  |

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| and wind tunnelling. This in turn will impact upon the learning environment of the students. Additionally the proposal will exacerbate shortage of places at Kensington Public School.   | transitions to 9 stories towards Todman Ave (31m) and up to 18 storeys fronting Anzac Parade. This will limit the impacts and provide an appropriate transition between the business zone and residential areas. Regarding solar access, shadow analysis was undertaken as part of the Urban Design study, with results indicating that the School site will not be impacted during lunch period or before 2pm in mid-winter. Further information is provided in the Council report.  |
| Dewatering of Botany Aquifer and surrounding 'zone of influence' during the construction of buildings may cause structural problems to surrounding properties. Additionally residents have raised concerns that the sandy soil will not be able to provide structural support to tall buildings such as those proposed on the node sites.                  | Council has been provided with advice that the aquifer is capable of handling additional growth in the area. Council is currently in the process of preparing a Development Control Plan (DCP) which will outline detailed controls relating to the structural integrity of any development and surrounding buildings including during construction and this will be subject to further community consultation in early 2020. Council will seek further advice from a geotechnical and/or hydrological engineer in relation to the draft DCP. |
| Student accommodation does not have adequate living space & parking for permanent residents. The boom in overseas students will not last and, when demand for student accommodation drops, Kensington will be left with these flawed buildings. Additionally student accommodation does not contribute to the community and results in isolated residents. | Growth projections for the centres indicate that the demand for student housing will be sustained given the presence of UNSW within the vicinity of the centres is expected to remain strong in the near and long term future. Notwithstanding this development on the node sites require a minimum 1:1 FSR of Commercial Floor Space to ensure employment opportunities and publicly accessible spaces are provided in the centres.  |
| Concerns that the 18 storey buildings will set a precedent for other owner land owners seeking spot rezoning along Anzac Parade.   | See comments in cover report to Council.  |

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| <p>New buildings will reduce amount of green space in the centres and will impact upon the natural environment within the area. The proposal should require buildings to be constructed using sustainable methods and initiatives.</p>   | <p>Council is currently preparing an updated Environment Strategy which will consider green infrastructure and sustainability initiatives on both privately owned properties and public spaces. Section 7 of part C of the draft strategy outlines a number of sustainable initiatives including requiring water sensitive urban design and incorporating renewable energy technologies in the public realm among other initiatives. In relation to site specific landscaping, detailed site by site controls relating to landscaped area will be prepared as part of a future Development Control Plan (DCP) which will be subject to further community consultation in early 2020.</p>   |
| <p>The Proposal will result in overshadowing and privacy impacts to surrounding residents.</p>   | <p>The proposed urban design and height transition approach responds to a key consideration in the draft Strategy that new development should protect adjoining areas and not adversely overshadow public spaces. Part C 5.6 of the draft Strategy addresses solar access. These new requirements will be contained in a draft Development Control Plan (DCP) for the town centres along with other planning and design controls which will be subject to further community consultation. Regarding privacy impacts, Council is currently in the process of preparing a Development Control Plan (DCP) which will outline detailed controls relating to privacy mitigation measures and will largely reflect the vision of the strategy. This will be subject to further community consultation in early 2020.</p> |
| <p>The South-East Light Rail will not have the capacity to accommodate the additional population given previous reports have stated that the network will be at or close to capacity upon opening. It has been requested that council defer the proposal until one year after operation of light rail to assess its operation.</p> | <p><b>Advice provided by Council's transport consultant is that public transport capacity can be met</b> if the light rail together with buses continue to service the transport needs of the precinct and as such it is not considered appropriate to delay the proposal. Further information is provided in the Council report.</p>  |
| <p>Details of proposed bicycle lanes are not clear.</p>  | <p>The contribution plan outlines cycleways along Todman Avenue and Lenthall Street and includes allocated funding for these routes. See Part C Section 7.10 of the Strategy for more information.</p>   |

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| <p>The community will be significantly affected by the proposal including loss of sense of community.</p>                              | <p>Increasing building heights provides a catalyst for renewal and an opportunity to improve the public domain, commercial and retail offerings, new jobs and to provide more homes for people to live close to good amenity. To fund such improvements to the town centres, the Planning Proposal proposes a new Community Infrastructure Contributions Scheme and increased development levies that will enable community and local infrastructure to be developed to support the growth of the Kensington and Kingsford town centres and the creation of a long term vision that is sustainable, liveable and vibrant.</p>   |
| <p>The town centres are not appropriate for additional growth and this should be provided elsewhere in the LGA and Greater Sydney.</p> | <p>Randwick City needs to plan for population and employment growth. As part of the State <b>Government's</b> metropolitan plan for Sydney (A Plan for Growing Sydney), the Council is required to demonstrate how population growth and dwelling demand can be met via its local planning framework. The Kensington and Kingsford areas will be able to accommodate a portion of the overall projected growth of Randwick given the location of the light rail corridor in relation to the centres and proximity to major employment destinations (CBD, Randwick Health and Education Precinct). The draft Planning Proposal has taken an urban design approach to ensure the growth is delivered in conjunction with increased benefits to the public realm and visual amenity.</p> |
| <p>The Proposal will result in ugly, concrete buildings that will destroy the existing character of the town centres.</p>              | <p>Council's design excellence policy which requires an architectural design competition at nodes sites seeks to ensure that future buildings will meet a high standard of design. Council is currently in the process of preparing a Development Control Plan (DCP) which will outline detailed controls relating to building design and will be subject to further community consultation in early 2020.</p>  |
| <p>The Proposal should be undertaken as part of a larger, LGA wide LEP review.</p>   | <p>This planning process has been in preparation since 2016 and should not be delayed. The needs of the precinct and residents of Randwick have been included in the preparation of the strategy and Planning Proposal. A place-based and integrated approach has been undertaken to develop the Proposal aimed at creating vibrant and attractive centres with infrastructure planning that will foster a strong local economy and a strong sense of community.</p>  |

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| <p>The Proposal will result in a loss of existing open space and does not propose any significant additional open space areas.</p>  | <p>The draft Strategy contains initiatives to create open space and public spaces within and around the town centres. Council has investigated conversion of redundant road reserves into informal public spaces and creating plazas with landscaping and feature trees in strategic locations. Two key strategies relating to open space and connecting open/green spaces with larger parks such as Kensington Park and Daceyville Gardens are included in Part C section 8.1 of the draft Strategy. Maps within the Strategy shows these locations which include Kingsford Junction and side streets off Anzac Parade such as Meeks St Plaza. Similarly in Kensington, there is a potential for the southern part of the Racecourse site to be opened to public access.</p>  |
| <p>The proposed uplift should be supported by a metro rail line.</p>  | <p>The state government is responsible for providing transport infrastructure for NSW. The Future Transport Strategy suggests extension of the Sydney Metro line within the LGA. No metro is planned in the short to medium term.</p>  |
| <p>Public infrastructure including the hospital, sewerage, stormwater, electricity and other services will not have the capacity to deal with the increased population.</p>                           | <p>Council has undertaken consultation with public agencies who have advised that there is capacity of services to deal with the increased population or have advised that upgrades will occur to deal with population projections. Council will continue to work with agencies as developments occur to ensure that infrastructure improvements align with population growth. See response provided in Council report.</p>  |
| <p>The proposed affordable housing component of the proposal will result in undesirable residents moving into existing town centres which will increase rates of crime and reduce housing prices.</p> | <p>The affordable housing plan is intended for lower income households who live and/or work in the LGA. The rent setting policy is set out in the affordable housing plan. The Community Housing Provider (appointed to manage the property and tenancy services of Council's affordable housing program) will ensure that the rents charged and ongoing tenant eligibility are in accordance with the NSW Ministerial Affordable Housing Guidelines and Council's Affordable Housing Plan. There is no evidence to suggest that the provision of affordable housing will bring a more transient population. Many of the tenants who are provided housing assistance through <b>Council's</b> affordable rental housing program have been housed for a number of years. In addition, there is no evidence to suggest that Council's affordable housing units and tenants have impacted on property values in neighbouring areas. Further discussion on the need to provide for affordable housing to support the socio and economic functions of a city is outlined in the Affordable Rental Housing Needs Analysis attached to the Draft Affordable Housing Plan.</p> |

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| <b>The selection of 'opportunity sites' is unfair</b> and there does not exist clear justification as to why these were selected.  | Node sites were located at strategic accessible locations that could accommodate taller, slender buildings being in line with the urban design strategy undertaken as part of the proposal. See Section 5.2 of Part C of the strategy for more information.                              |
| Construction impacts including noise, visual impacts and dust resulting from the light rail have affected businesses and residents and any additional construction resulting from this proposal will further impact residents in the area. As such the proposed development should be delayed to give residents a break. | Ongoing impacts from construction will be managed through conditions of consent placed on development applications including dust and noise mitigation measures.   |
| The Proposal should include minimum site-amalgamation controls in order to ensure lots are not isolated between large developments.  | Council is currently in the process of preparing a Development Control Plan (DCP) which will outline detailed controls relating to site amalgamation controls and will largely reflect the vision of the strategy. This will be subject to further community consultation in early 2020. |
| Requests from various property owners to include sites within the K2K Planning proposal boundary.  | Council officers have prepared individual data sheets that discuss the requests received from property owners for land to be included in the current Planning Proposal and makes a recommendation as to whether the request is justified. See Appendix B for further reference.          |
| There is not enough demand for apartments in Sydney and the proposal will result in empty, unwanted developments.  | Growth projections for the centres show that there is demand for additional dwellings in the long term.  |
| There is not enough demand for the projected employment floor space in the area and it will be difficult for owners and developers to get tenants into shops.  | The employment forecast undertaken as part of the study indicated that there was demand for additional employment floor space. See Section 2.3 of Part B of the Strategy for more information.   |
| The area needs key businesses including supermarkets, post offices and the like.   | Agreed. Council has identified new community facilities on key sites including a new multi purpose community space and plaza. See Part C section 9.0 of the strategy for more information. The mix of land uses within the centres such as post-offices, supermarkets and                |

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|  | other major retail uses is determined by the private property market however will work with landowners to advocate for the provision of businesses that will support diversity and vibrancy within each of the centres.  |
| There should be a required mix of dwelling types within the centre.  | The Apartment Design Guideline (ADG) is applicable to all new residential buildings in NSW having a height greater than 3 storeys. The ADG specifies a minimum apartment mix for all developments.   |
| The proposed changes will significantly impact upon the heritage items and buildings within the centre and the heritage value of the greater area.   | Council identified buildings of heritage significance and carried out a heritage review of Kingsford town centre during initial studies relating to the project. It is proposed that new infill development be required to respect the height, scale and character of contributory buildings (see Part C, Section 6 of the Strategy for more information). |
| The proposed contributions package including affordable housing, section 7.12 infrastructure contribution and additional Community Infrastructure contribution make development within the centres unfeasible. | Economic advice sought has indicated that the total contribution is estimated to be \$65,000 per dwelling. Both the CIC and s7.12 contribution per dwelling is in line with the existing s7.11 contribution cap for a residential dwelling. Further discussion on feasibility and development viability considerations are outlined in the Council report. |
| The proposed Design Excellence Policy may impact upon feasibility of applications and is particularly onerous.   | The proposed Design Excellence policy and associated LEP clause will only apply to <b>properties identified as 'Opportunity Sites' in the circumstance where the landowner seeks to benefit from additional uplift</b> . It is considered that the cost of facilitating the policy will be covered by the additional uplift.                               |