

Our Ref: D03052836

18 October 2017

Mr Steve Murray
Executive Director
Department of Planning & Environment
GPO Box 39
SYDNEY, NSW 2001

Dear Mr. Murray,

RE: Kingsford and Kensington Planning Proposal – AJ+C Urban Design Review

I write to you regarding the Review for DPE of the Randwick K2K Planning Strategy (the Review) by Allen Jack + Cottier (AJ+C) dated May 2017.

AJ+C were engaged by the Department of Planning and Environment to undertake a peer review of the Draft Planning Strategy Kensington and Kingsford Town Centres, proposed and lodged by Randwick City Council in January 2017. The scope of the Review included:

- Review/check constraints mapping
- Review and identify any further opportunity sites that may be appropriate for increased density controls
- Check/advise capacity/yields for any recommended opportunity sites

Thank you for providing Council an opportunity to respond to the Review by AJ+C. A detailed and thorough site by site analysis of the Review's recommendations is attached to this letter. The attached analysis demonstrates why the Review's recommendations are inappropriate and that Council's own investigations of the environmental, social and economic factors pertaining to the town centres supports the vision contain in the Planning Strategy and the development standards in the planning proposal.

If you require any further information, please contact me on 9093 6895 or alan.bright@randwick.nsw.gov.au.

Yours sincerely,



Alan Bright
Manager Strategic Planning

Analysis and Feedback on AJ+C Review

General Comments

Council undertook a comprehensive town centre review including social, economic and environmental considerations in the preparation of the Kensington and Kingsford Town Centre Planning Strategy. The Strategy was informed by considerable background research and analysis, including an economic needs analysis, a heritage study, an urban design report, transport system analysis and a traffic study; extensive community engagement; and an International K2K Urban Design Competition which sought innovative ideas from multi-disciplinary teams to support the future of the area. As a town centre review, dwelling capacity is just one of many issues to be considered.

As outlined in Council's Strategy, the urban design approach for the corridor takes a balanced view of future dwelling growth focussing on key nodes that respond to local character, transitional heights and improvements to local infrastructure and liveability for residents, businesses and visitors to the Centres. Having considered the opportunities and constraints of each centre, Council's strategy provides for an optimal and well-considered distribution of dwelling growth. Our reading of the AJ+C document indicates that it is not a peer review of Council's work, but something more akin to a consultant report for a housing study. The scope of works, as outlined in the executive summary, includes identifying further opportunity sites and advising on capacity/yields for any recommended opportunity site. As the consultant was required to look for opportunities for additional dwelling yield, it should be noted the report is not a peer review.

Reference to former UAP

Given that the State Government has effectively abandoned the Randwick UAP process, the rationale for referencing and comparing the Strategy to the former Randwick UAP is unclear. The UAP should not be considered any kind of benchmark for future planning strategies, in Kensington and Kingsford town centres, or elsewhere. The purpose of the Strategy is clearly outlined in Part A Overview of the Strategy, and we cannot see the relevance of the UAP to this process.

Dwelling capacity

A 'walkable catchment' analysis to identify opportunities for dwelling growth within walking distance of the light rail is, in theory, supported, and was a factor in the Strategy's node placement. As mentioned previously, our position that if the light rail has additional capacity, above what is provided for in the Strategy, then a better outcome would be for additional dwellings to be provided within the light rail corridor. A future housing study could investigate opportunities for future dwelling growth outside the B2 Local Centre Zone, within walking distance to the town centres and light rail stops. This approach would provide more diverse housing options to meet future needs of the community, and allow for a thorough planning and urban design analysis to accompany any additional capacity.

It is also noted there is no mention in the AJ+C report of the associated infrastructure impacts of the recommendations, or commentary on whether the existing and proposed (in the K2K strategy) infrastructure improvements/public benefits would be adequate to cope with the additional population generated by these recommendations.

The Strategy is consistent with State Government dwelling targets and population projections. Council is on track to provide the draft Central District Plan's 5-year target of 2,250 dwellings by

2021. The Strategy also outlines how Council plans to accommodate the State Government's 2014 projected dwelling demand of 15, 150 additional new dwellings by 2031. Increasing the dwelling capacity of the town centres would be inconsistent with Council's more balanced approach to planning for growth, which is to ensure an even and equitable distribution of housing delivery to meet future needs in areas which are best served by the infrastructure.

Speculative Planning Proposals

We are concerned about the speculative planning proposals and their supporting documentation being used to inform the AJ+C Review. Significant increases in the height and FSR of sites which were the subject of previous planning proposals, being 11-125 Anzac Parade and 112 Todman Avenue, Kensington, 137-145A Anzac Parade, Kensington and 391-397A Anzac Parade and 17 Bunnerong Road, Kingsford provides advantage to the owners of these sites and creates the perception that this is developer driven. Given these planning proposals, which were prepared to further private interests rather than the public interest, have all been recommended for refusal by the JRPP, we strongly believe they should not in any way be used to inform a Planning Strategy.

Furthermore, it should be noted that the planning proposals for 137-151 Anzac Parade, Kensington and 111-125 Anzac Parade and 112 Todman Avenue, Kensington haven't been determined by DPE, despite them being recommended for refusal by the JRPP some 10 months ago. As per Council's previous correspondence, the uncertainty created by this is of concern to Council.

Built form

The Strategy proposes detailed built form controls, having regard to:

- An appropriate bulk, scale and massing
- Relationship and response to surrounding development and public domain, including solar access considerations
- Environmental constraints including overshadowing and aircraft noise limitations
- Capacity to accommodate additional floor space to meet future demand (residential and commercial)
- Requirements of SEPP 65 and the Apartment Design Guide
- Economic feasibility including development yield and viability

Having regard to all the above, 3D modelling was utilised to test and refine urban design principles for the town centres, and identify heights and FSRs that were compatible with each other. The AJ+C Review proposes additional height and FSR without adequate justification for why specific sites have been chosen, without consideration of potential shadowing impacts, and without addressing bulk, visual impacts, heritage value or the transition with existing development within and adjacent to the centres.

Built form modelling for the Strategy demonstrates that additional residential and employment floor space can be accommodated within a mid-scale urban environment with some taller buildings clustered at strategic nodes to facilitate activation and the delivery of improved public domain. The taller building forms were proposed for 15/16 stories, with 17/18 stories permissible with design excellence. Council has tested the building heights proposed in the Strategy with respect to shadows, bulk and visual impact on Anzac Parade and the surrounding residential areas. The Review's proposed building heights of up to 25 stories have not been tested, and concern is raised over the shadowing impact, bulk and visual impact and transition to surrounding residential areas. Heights of up to 25 stories are wholly incompatible with the context and character of Kensington and Kingsford and are not supported.

We raise serious concern that increasing the maximum FSR, as recommended by AJ+C will add to the bulk, shadowing and visual impact of the buildings, resulting in greater impacts on surrounding residential areas. The FSRs recommended by the Review, of up to 6:1 are indicative of fringe CBD areas with greater levels of accessibility than Kensington and Kingsford, and are wholly incompatible with the context of Kensington or Kingsford. The FSRs proposed in the Strategy are chosen after detailed urban design review, including 3D modelling and constraints and opportunities modelling, and are considered the maximum appropriate FSRs for this location.

The proposed 850m² floor plate control for taller residential buildings, proposed in the Review, is likely to result in buildings with unacceptable bulk. The Urban Design Report by Conybeare Morrison recommends a maximum floor plate of 600m² for taller building forms as this will result in slender buildings with less visual impact, less bulk and faster-moving shadows. This will have a detrimental impact on the streetscape of Kensington and Kingsford town centres which already accommodate significant development of 7/8 stories and Council does not support any increase to the maximum floor plate.

Council's urban design analysis identified a four storey street wall as appropriate to achieve a cohesive streetscape consistent with existing development, reinforce a pedestrian scale and reduce the visual impact of building bulk within both town centres. A six storey street wall as proposed in the AJ+C review is not supported.

Council does not support the Review's recommendations for increases in height or FSR above what is outlined in the Planning Strategy, an increase in the maximum floor plate control or an increase in the street wall height. The following table provides block by block comments on the AJ+C recommendations, confirmed during recent ground investigations which included visual analysis and consideration of environmental impacts.

Detailed Comments

Site	RCC Strategy	AJ+C	Comment
Kensington			
<p>1, 2 & 3</p>	<p>54m (16 storeys) or 60m (18 storeys with design excellence) 5:1 FSR Max tower footprint 600m² 4 storey street wall min 1:1 commercial FSR</p>	<p>Expanded/larger opportunity site 54m (16 storeys) or 60m (18 storeys with design excellence) 5:1 FSR or 5.5:1 FSR with design excellence Max tower footprint 850m² 6 storey street wall min 1:1 commercial FSR</p>	<p>Expanding the extent of the opportunity sites to include additional sites will likely result in two tower forms on each corner, as opposed to the one tower form proposed under the Strategy. This will significantly increase the visual impact on the surrounding residential area.</p> <p>In addition, expanding the opportunity site to the south of the Todman Avenue intersection draws activity and emphasis away from the light rail stop which lies to the north of the intersection.</p> <p>In particular, expansion of opportunity site 2, to a maximum height to 18 storeys would be incompatible with the adjoining heritage item I114 Single storey terrace group at 1-27 Darling Street. The proposed 16-18 storeys would create a drastic height disparity, overwhelming the heritage items and providing an inappropriate transition.</p> <p>Increasing the maximum FSR on the site will add to the bulk and scale of the buildings, increasing visual impact and overshadowing, and will likely be unachievable while meeting the maximum building height and additional DCP controls such as setbacks and transition heights. The Strategy recommended a floor plate control of 600m² for taller building forms, and increasing the FSR and maximum floor plate controls will result in unacceptably bulky buildings.</p> <p>This will result in an undesirable transition to the existing surrounding development, overshadow the expansion of the public plaza at Addison Street to the south of the site, and have</p>

			<p>unacceptable impacts on the surrounding residential area. The increase in maximum FSR and the expansion of the opportunity sites is not supported.</p> <p>It is also noted that the expansion of opportunity site 1 was the subject of a previous planning proposal, and we strongly object to any developer-driven planning proposal informing the planning controls for a site.</p>
	 <p>Figure 1: Existing development at proposed extension to opportunity site 1</p>	 <p>Figure 2: 18 storeys at Site 2 would be an inappropriate transition to the heritage terraces at 1-27 Darling Street</p>	 <p>Figure 3: 18 storeys would be an inappropriate height adjacent to the low-rise residential character of Bowral Street</p>
<p>4</p>	<p>54m (16 storeys) or 60m (18 storeys with design excellence) 5:1 FSR Max tower footprint 600m² 4 storey street wall min 1:1 commercial FSR</p>	<p>Expanded/larger opportunity site 66m (20 storeys) or 82m (25 storeys with design excellence) 6:1 FSR Max tower footprint 750m² 6 storey street wall min 1:1 commercial FSR</p>	<p>It is unclear why this site was chosen for higher height and FSR over other corner sites of the Todman Avenue intersection. It is noted the proposed height in the Review is consistent with the planning proposal recommended for refusal by the JRPP, and we strongly object to any developer-driven planning proposal informing the planning controls for a site.</p> <p>Increasing the maximum FSR will add to the bulk of the building, increasing visual impact and overshadowing. The increased FSR will likely be unachievable while meeting additional DCP controls such as setbacks and transition heights. Given the current and</p>

			future role of Kensington as a local centre, 18 storeys (with design excellence) is viewed as the maximum appropriate height for this location and the increased height and FSR is not supported.
5	Not included within K2K Strategy	Recommended for inclusion within town centre study area to further support potential cross-site links to Boronia Street and a more carefully considered transition in scale	This site is not included within the Planning Strategy boundary as adopted by Council, and therefore cannot be supported. This site may have potential and could be investigated as part of a future housing study which also addresses locational context and strategic merit, such as the relationship with existing lower scaled buildings, block/mass analysis, potential heritage significance, visual analysis and environmental considerations. This site is outside the Strategy boundary and is not supported.
Kingsford			
Kingsford Midtown			
1, 2 & 3	54m (16 storeys) or 60m (18 storeys with design excellence) 5:1 FSR Max tower footprint 600m ² 4 storey street wall min 1:1 commercial FSR	Expanded/larger opportunity site 54m (16 storeys) or 60m (18 storeys with design excellence) 5:1 FSR or 5.5:1 FSR with design excellence Max tower footprint 850m ² 6 storey street wall min 1:1 commercial FSR	Increasing the maximum FSR will add to the bulk and scale of the buildings, increasing visual impact and overshadowing, and will likely be unachievable while meeting the maximum building height and additional DCP controls such as setbacks and transition heights. The Strategy recommended a floor plate control of 600m ² for taller building forms, and increasing the FSR and maximum floor plate controls will result in unacceptably bulky buildings. This will result in an undesirable transition to the existing surrounding development and have unacceptable shadowing and visual impacts on the surrounding residential area and on the heritage item O’Dea’s corner (site 4). The increase in maximum FSR is not supported.
4	Heritage item - no changes to height or FSR	54m (16 storeys) or 60m (18 storeys with design excellence) 5:1 FSR or 5.5:1 FSR with design excellence Max tower footprint 850m ²	The site is constrained due to surrounding recent mixed use development and the heritage item, O’Dea’s corner, on the site. Any increase in height and FSR would need to consider required setbacks in accordance with the Apartment Design Guide and

		<p>6 storey street wall 1:1 min. non-resi FSR Careful design solutions required to address heritage characteristics</p>	<p>amenity impacts on the existing multi-storey development which wraps around the side and rear of the site.</p> <p>As part of the town centre review, Colin Brady Heritage Consultant was engaged to undertake a heritage review of Kingsford town centre. The review reaffirmed the heritage significance of O’Dea’s corner as a well detailed example of Federation shop/residence development and for its association with Frank O’Dea – bookmaker, real estate developer and promoter of cultural activities in the foundation years of South Kensington (later renamed Kingsford). Due to the heritage significance of the site, no height or FSR increases were proposed in the strategy for this site.</p> <p>The proposed 16-18 storeys on this site is excessive, given the heritage value of O’Dea’s Corner. 16-18 storey would be overwhelming in scale, would dominate the heritage fabric and component of the item, and cannot be supported.</p> <p>The increase in height and FSR is not supported.</p>
	 <p>Figure 4: Interface between site 1 and the low-medium density development across Houston lane</p>	 <p>Figure 5: The 8-storey mixed use development surrounding the heritage item at site 4</p>	 <p>Figure 6: Interface between site 4 and the adjoining mixed use development</p>

Kingsford Junction			
5	<p>31m (9 storeys) 4:1 FSR 4-storey street wall No min commercial</p>	<p>60m (18 storeys) or 66m (20 storeys with design excellence) 5.5:1 FSR or 6:1 FSR with design excellence Max tower footprint 850m² (or 750m² if 20 storeys) 6 storey street wall min 1:1 commercial FSR</p>	<p>The planning proposal specified a moderate increase in height along Anzac Parade to reinforce the urban 'spine' of the town centres, protecting lower scale residential neighbourhoods to the east and west and allowing scope for a transition in height. The higher building height is used to define the nodes, located at key light rail stops.</p> <p>The increased height on this site would draw visual emphasis away from the two identified southern gateway sites for the Kingsford town centre: the Triangle site and the Rainbow Street Market site (sites 7 & 8). The two identified gateway/opportunity sites at Kingsford Junction were identified predominantly for their proximity to the new light rail terminus. Due to the proposed intersection layout and functionality for Kingsford Junction, the northern parts of the town centre, including this site, will have more constrained pedestrian access to the terminus than the identified opportunity sites and this site is not suitable for an opportunity site.</p> <p>Kingsford Junction is constrained by airport and height limitations. Council officers met with representatives from Sydney Airport and the Commonwealth Department of Infrastructure and Regional Development in relation to the draft Strategy and airport restrictions were made clear. The proposed height in the strategy reflects the Commonwealth response, and will be subject to further scrutiny by the Commonwealth and Sydney Airport during the public consultation phase.</p> <p>As the population density of the area increases, protecting sun access to public spaces becomes increasingly important. The shadowing impact on Dacey Gardens needs to be carefully</p>

			<p>considered and tested using 3D modelling and detailed visual analysis.</p> <p>The increased height may also be incompatible with the heritage character of Dacey Gardens and the surrounding historic suburb of Daceyville, and a detailed heritage impact assessment should be part of any proposal to increase the height of this site.</p> <p>The increased height and FSR are not supported.</p>
6	<p>31m (9 storeys) 4:1 FSR 4-storey street wall</p>	<p>60m (18 storeys) or 66m (20 storeys with design excellence) 5.5:1 FSR or 6:1 FSR with design excellence Max tower footprint 850m² (or 750m² if 20 storeys) 6 storey street wall min 1:1 commercial FSR</p>	<p>The planning proposal specified a moderate increase in height along Anzac Parade to reinforce the urban 'spine' of the town centres, protecting lower scale residential neighbourhoods to the east and west and allowing scope for a transition in height. The higher building height is used to define the nodes, located at key light rail stops.</p> <p>The narrow width of Anzac Parade at this point, and the locational context of this site within a long block means 9-storeys provides a better relationship of scale to the rest of the block, and the rest of the Kingsford town centre. The 9-storey building height on this site also relates well in scale to the existing 9-storey development across the road at 532 Anzac Parade, Kingsford (Churchill's hotel development).</p> <p>The proposed 18-20 storeys on this site would draw visual emphasis away from the two identified southern gateway sites (sites 7 & 8). The two identified gateway/opportunity sites at Kingsford Junction were identified predominantly for their proximity to the new light rail terminus. Due to the proposed intersection layout and functionality for Kingsford Junction, the northern parts of the town centre, including this site, will have more constrained pedestrian access to the terminus than the identified opportunity sites and this site is not suitable for an opportunity site.</p>

			<p>As the population density of the area increases, protecting sun access to public spaces becomes increasingly important. The shadowing impact on Dacey Gardens (Heritage item I76 Dacey Garden Reserve and Substation and Daceyville Garden Suburb Heritage Conservation Area) needs to be carefully considered and tested using 3D modelling and detailed visual analysis.</p> <p>The increased height may also be incompatible with the heritage character of Dacey Gardens (Heritage item I76 Dacey Garden Reserve and Substation and Daceyville Garden Suburb Heritage Conservation Area), and a detailed heritage impact assessment should be part of any proposal to increase the height of this site.</p> <p>Kingsford Junction is constrained by airport and height limitations. Council officers met with representatives from Sydney Airport and the Commonwealth Department of Infrastructure and Regional Development in relation to the draft Strategy and airport restrictions were made clear. The proposed height in the strategy reflects the Commonwealth response, and will be subject to further scrutiny by the Commonwealth and Sydney Airport during the public consultation phase.</p> <p>The increased height and FSR are not supported.</p>
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Figure 7: Site 5 and 6 viewed from the western side of Anzac Parade, showing the narrow width of Anzac Parade



Figure 8: Site 5, viewed from the western side of Anzac Parade



Figure 9: Site 5, as viewed from Dacey Gardens

7	<p><u>Part of site:</u> 54m (15 storeys) or 60m (17 storeys with design excellence) 5:1 FSR Max tower footprint 600m² 4 storey street wall min 1:1 commercial FSR</p> <p><u>Part of site:</u> 31m (9 storeys) 4:1 FSR 4-storey street wall No min commercial</p>	<p>60m (18 storeys) or 66m (20 storeys with design excellence) 5.5:1 FSR or 6:1 FSR with design excellence Max tower footprint 850m² (or 750m² if 20 storeys) 6 storey street wall min 1:1 commercial FSR</p>	<p>Kingsford Junction is constrained by airport and height limitations. Council officers met with Sydney airport and the Commonwealth Department of Infrastructure and Regional Development in relation to the draft Strategy and airport restrictions were made clear. The proposed height in the strategy reflects the Commonwealth response, and will be subject to further scrutiny by the Commonwealth and Sydney Airport during the public consultation phase.</p> <p>The south eastern part of the site closer to Sturt Street is not appropriate for 18-20 storey heights. The residential area immediately to the south has a maximum building height of 9.5m and the proposed building height of 60-66m is at least 6 times that of the adjoining area. The proposed building height does not provide a sensitive transition and the increase in building height across the site is not supported.</p>
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			<p>Increasing the maximum FSR will add to the bulk and scale of the buildings, increasing visual impact and overshadowing, and will likely be unachievable while meeting the maximum building height and additional DCP controls such as setbacks and transition heights. This will result in an undesirable transition to the existing surrounding development and have unacceptable impacts on the surrounding residential area. The increase in maximum FSR is not supported.</p> <p>It is also noted that this site was the subject of two previous planning proposals, and we strongly object to any developer-driven planning proposal informing the planning controls for a site.</p>
8	<p><u>Part of site:</u> 54m (15 storeys) or 60m (17 storeys with design excellence) 5:1 FSR Max tower footprint 600m² 4 storey street wall min 1:1 commercial FSR</p> <p><u>Part of site:</u> 31m (9 storeys) 4:1 FSR 4-storey street wall No min commercial</p>	<p>60m (18 storeys) or 66m (20 storeys with design excellence) 5.5:1 FSR or 6:1 FSR with design excellence Max tower footprint 850m² (or 750m² if 20 storeys) 6 storey street wall min 1:1 commercial FSR Careful design solutions required to address heritage characteristics</p>	<p>Kingsford Junction is constrained by airport and height limitations. Council officers met with Sydney airport and the Commonwealth Department of Infrastructure and Regional Development in relation to the draft Strategy and airport restrictions were made clear. The proposed height in the strategy reflects the Commonwealth response, and will be subject to further scrutiny by the Commonwealth and Sydney Airport during the public consultation phase.</p> <p>The eastern part of the site is not appropriate for 18-20 storey heights. The area immediately to the east is zoned R2 low density residential and has a maximum building height of 9.5m and the proposed building height of 60-66m is at least 6 times that of the adjoining area. The proposed building height does not provide a sensitive transition and the increase in building height across the site is not supported.</p> <p>Increasing the maximum FSR will add to the bulk and scale of the buildings, increasing visual impact and overshadowing, and will likely be unachievable while meeting the maximum building</p>

			height and additional DCP controls such as setbacks and transition heights. This will result in an undesirable transition to the existing surrounding development and have unacceptable impacts on the surrounding residential area. The increase in maximum FSR is not supported.
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