



Mr Thomas Dales
Department of Planning, Housing and
Infrastructure
4 Parramatta Square, 12 Darcy St
PARRAMATTA NSW 2150

24 April 2026

Ref No: F2020/00704

By email: thomas.dales@dpie.nsw.gov.au

Dear Mr Dales,

Reference number	SSD-79257208
Subject land	UNSW N18 Barker Street Parking Station – Corner of Barker Street and Willis Street, Kensington
Proposal	Alterations and additions to Barker Street Car Parking Station (N18) to increase parking capacity.

This letter comprises Randwick City Council's (Council) submission to SSD – 79257208 (the Application) at UNSW Site N18 – Barker Street Parking Station (the Subject Site).

Thank you for the opportunity to comment on the subject SSDA. Council officers have reviewed the SSDA documentation including the Environmental Impact Statement (EIS) and associated architectural drawing sets and documents. Council recognises the strategic role of the University of New South Wales within the Randwick Health and Education Precinct and acknowledges UNSW's objective to consolidate parking supply within the campus. Council's comments are provided having regard to a number of matters being satisfactorily addressed through the detailed assessment and, where appropriate imposed as conditions of consent:

Overall comments

Council notes that the proposed car park expansion will facilitate improvements to the on-campus user experience by enabling the progressive removal of at-grade car parking across the campus and the ongoing operation and enhancement of the UNSW Kensington campus public domain. The application should specifically address the locations, number and timeframe for removal of parking spaces across the Campus. The car park should integrate with the broader UNSW Transport Demand Management measures and green travel plans to reduce overall car dependence over time.

Built form

1. Council acknowledges and supports adaptive reuse of the existing parking structure and notes that the built form has been refined through consultation with the State Design Review Panel. Notwithstanding, the proposal will result in a noticeable increase in height, bulk and visual prominence, particularly when viewed from Barker Street and nearby

residential areas. Council remains concerned about the extent to which the expanded development emerges above the established tree canopy and alters the relationship between the campus edge and surrounding low- to medium-density residential development along Barker and Willis Street.

2. Council considers that further emphasis is required on minimising the perceived scale and visual impact of the upper levels, including the treatment of rooftop elements and structural cores. High-quality façade articulation, effective screening, integrated landscaping and careful management of light spill are critical to ensuring the development presents a recessive and well-resolved built form at the campus boundary.
3. Council considers the addition of three new levels results will be a visible increase in height and bulk along a sensitive campus–residential interface. Further response to this matter is provided below under Visual Impact

Traffic, transport and access

4. Council supports the provision of the enhanced end of trip (EoT) facilities, including additional bicycle parking, showers and change amenities, as an important measure to promote active transport and reduce reliance on private vehicles.
5. Council, as the landowner and roads authority for Barker Street, Kingsford, supports in-principle approval for the proposed works, subject to the following requirements:
 - The applicant, in their design development, explore opportunities for urban greening on Barker Street (within the road reserve) and return a design report to Council demonstrating this objective
 - A raised pedestrian crossing, to Council and TfNSW satisfaction, be designed and included in the public domain works to provide a pedestrian pathway across Forsyth Street to encourage full utilisation of the signalised intersection once the existing pedestrian crossing is removed
 - The applicant must further apply for an approval under s138 of The Roads Act (Civil Works Application), prior to commencing any works within the road reserve
 - The applicant seeks landowners consent and future approval under s138 of The Roads Act 1993 for all works located on Forsyth Street, Kingsford from Crown Land (as Forsyth Street is a Crown Road).
 - The applicant obtains all relevant approvals for the construction/installation of traffic signals at the intersection of Barker Street and Southern Drive from TfNSW and that Council is consulted throughout the design refinement.
6. The proposed signalised intersection is supported in principle. Council requests that the signalised intersection (Gate 14) is designed to accommodate a future proposed cycleway along Barker Street.
7. Given the proposed increase in parking capacity, Council requests that an additional, car-park-specific Green Travel Plan or implementation framework be provided to clearly demonstrate how the expanded Barker Street car park will operate consistently with these targets. In particular, Council seeks further detail on how the design and management of the car park will actively support mode shift outcomes, including the integration of end-of-trip facilities, parking allocation policies, pricing or access controls, promotion of car-share and electric vehicles, and measures to avoid inducing additional private vehicle demand. Council considers that a clear and measurable strategy is required to

demonstrate how the car park will contribute to, rather than undermine, UNSW's Green Travel Plan objectives and broader State and local sustainable transport policies

Landscaping and public domain

8. Council supports the proposed additional boundary planting and landscaping adjacent to the expanded car park structure, including the enhancement of understorey planting within and around the site.
9. Council also supports, in principle, the proposed planting above ground and on built elements, including planter boxes and green façade treatments, noting the potential visual and environmental benefits of these measures. However, as mentioned above, landscaping alone cannot be relied upon as an assured mitigation measure. Emphasis is made that the success of above-ground landscaping is highly dependent on ongoing maintenance, irrigation and long-term management. Further, as the planters mentioned above are intended to assist with future presentation of the external facades of the building, a Management Plan detailing a schedule for routine maintenance activities needs to be provided and adopted to ensure success of the planting, replacement of failed stock etc.
10. The podium/planter boxes shown for the Northern Lobby (Levels 3-8) & Western Lobby (Levels 2-8) are not open to natural rainfall due to being concealed behind the mesh screens as well as covered by the floor levels above, so will require irrigation for survival. Details of rainwater harvesting needs to be provided and then implemented on-site.
11. Consult/obtain written feedback from Council's Landscape Architect/Assets Officers over the creation of any new gardens/verge planting and similar that is being proposed on public property to ensure it maintains consistency with our own guidelines for matters such as species selection/composition, pedestrian access/safety, future maintenance, sight lines and similar.
12. In this regard, the 'sandstone stepping stones' shown on the Barker & Willis Street verges, on both the Ground – General Arrangement Plan 1 & Ground – Planting Plan by Architectus are unlikely to be supported by Council's Assets staff. Further consultations are required.

Sustainability

13. Council supports the proposed retention of the majority of existing mature trees on the site, together with the planting of 23 new trees resulting in a net increase of 9 trees overall. Council acknowledges that the existing tree canopy along Barker Street, Willis Street and within the site embankments plays a critical role in providing a natural visual buffer between the car park and surrounding residential properties.
14. Any clearance pruning to retained trees, as highlighted on the Tree Management Plan by Architectus, must be performed in accordance with Section 8.6 of the Arborist Report. The Project Arborist must prepare a separate Pruning Specification dealing with this component, which demonstrates compliance with AS4373-2007 – Pruning of Amenity Trees, prior to undertaking this tree work on-site.

The requirement to comply with the 'Mitigation Measures' at Section 7 and 'Recommendations' at Section 8 of the Arboricultural Impact Assessment & Tree Protection Plan by Canopy Consulting, ref E-002227-24, version 7 dated 30/01/26 (Arborist Report) must be formalised into conditions of consent, which includes the

requirement to engage a Project Arborist to supervise/monitor compliance throughout the project (as per Section 8.1).

15. The almost exclusively native plant palette is supported by Council. It is requested that this remains the case for any future revisions and is then delivered on-site.
16. Council is supportive of the delivery of strong environmentally sustainable design outcomes for the proposed development and notes the commitments outlined in the EIS. Council supports the installation of rooftop photovoltaic (PV) solar panels and the provision of electric vehicle (EV) charging infrastructure within the car park, which together represent positive measures to reduce operational greenhouse gas emissions and support the transition to lower-emissions transport.
17. In addition to the measures identified in the proposal, Council strongly considers that further sustainability outcomes should be incorporated through detailed design and supported by appropriate conditions of consent. This should include but not limited to:
 - future-proofing electric vehicle charging infrastructure for staged expansion, the use of energy-efficient lighting and smart controls
 - ongoing monitoring of energy and water performance to support continuous improvement
 - integrated landscaping and greening to mitigate urban heat island effects and improve micro climate
 - adoption of best-practice construction waste minimisation and resource recovery measures
 - installation of on-site battery storage systems to support energy resilience
 - embodied energy statement
 - continued alignment with UNSW's Net Zero commitments, including the role of parking management, electric vehicle infrastructure and end-of-trip facilities in supporting long-term mode shift away from private vehicle use.

Visual impact

18. Council notes that the exhibited Visual Impact Assessment does not adequately assess visual impacts on residential properties located directly opposite the site along Barker Street and Willis Street, which are among the most visually sensitive receivers due to their proximity, elevation and direct outlook toward the proposed development.
19. The EIS Visual Impact Assessment (VIA) concludes that, while mitigated through landscaping and built form treatment, the proposal "overall will have a noticeable visual impact" when viewed from Barker Street and Willis Street (see Section 6.1.4, pp. 65-67). Council notes a long-standing planning principle that vegetation alone cannot be relied upon to satisfactorily address visual bulk and scale impacts, as landscape elements may change or diminish over time. Should approval be granted, Council recommends a condition requiring further treatment of the uppermost levels to reduce perceived bulk and visual prominence, including increased setbacks, enhanced articulation and/or additional lightweight screening to rooftop and service elements, to ensure a more recessive built form and a clearer transition at the campus edge
20. Council raises concerns that the omission of these viewpoints underestimates the perceived bulk, scale and visual dominance of the additional levels and rooftop elements when experienced from private properties across Barker and Willis Street. This includes impacts associated with views of the upper parking decks, façade screening, lift overruns, lighting and vehicle activity that may be visible above the existing tree canopy.

21. It is requested that further analysis be undertaken to specifically address view impacts from directly facing residential properties and that additional design refinement be applied where necessary to minimise visual intrusion, particularly through façade treatment, screening, landscaping and management of upper-level elements.

S7.12 Development Contributions

22. Council notes the request within the EIS for an exemption from payment of Section 7.12 development contributions under the Randwick City Council Section 7.12 Contributions Plan 2024. Council has carefully considered this request and advises that the requested exemption cannot be supported. Council confirms that the proposed development should be subject to the full applicable Section 7.12 monetary contribution in accordance with the Plan.
23. The proposal represents a significant intensification of development, including a substantial increase in parking capacity and associated traffic and access infrastructure. While Council acknowledges that the development does not introduce residential floor space, it will nonetheless give rise to increased activity and demand for Council-managed public amenities and services, including, but not limited to, the local road network, pedestrian infrastructure, transport safety measures and the surrounding public domain. Council does not accept the assertion that the development creates no additional demand for public infrastructure. The 7.12 Contributions Plan expressly applies to non-residential development and is intended to capture development that results in increased intensity of use and cumulative impacts on public facilities, regardless of whether it introduces new dwellings or employment floor space. In this instance, the scale of the proposed carpark expansion and associated works will directly increase vehicle movements and pedestrian activity, resulting in intensified use of Council-managed infrastructure.
24. The fact that certain infrastructure works are proposed to be delivered by the applicant as part of the development (see Section 3.1, 3.8 and 3.9; pp10-11 and 41-45), does not offset the impacts on Council-owned and managed infrastructure, including vehicle movements on the local road network, higher pedestrian activity and greater demand on cycling, traffic safety, and public domain facilities and assets. In view of this, Council considers that the proposal clearly meets the threshold for the imposition of a Section 7.12 contribution, and that an exemption would be inconsistent with both the intent and equitable application of the Contributions Plan.
25. Council further acknowledges UNSW's role as a public, not-for-profit educational institution; however, this alone does not justify an exemption from development contributions. The proposed works are primarily intended to support the operational needs of the campus, and the delivery of on-site or campus-based infrastructure does not offset demand on municipal infrastructure funded through Section 7.12 contributions. Council is not satisfied that adverse financial circumstances have been demonstrated, particularly in the context of the scale and estimated cost of the development. Granting an exemption in this instance would also undermine the equitable and consistent application of the Contributions Plan and set an undesirable precedent. Accordingly, Council requests that a condition of consent be imposed requiring payment of the applicable Section 7.12 contribution.

If you would like to discuss any of these matters further, please contact David Appleby,
Coordinator Strategic Planning, on 9093 6982.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stella Agagiotis', written in a cursive style.

Stella Agagiotis
Manager Strategic Planning

<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 uslužni 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 Intérpretes ["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, lütfen 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 Tolmás 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 يُمكنك 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>