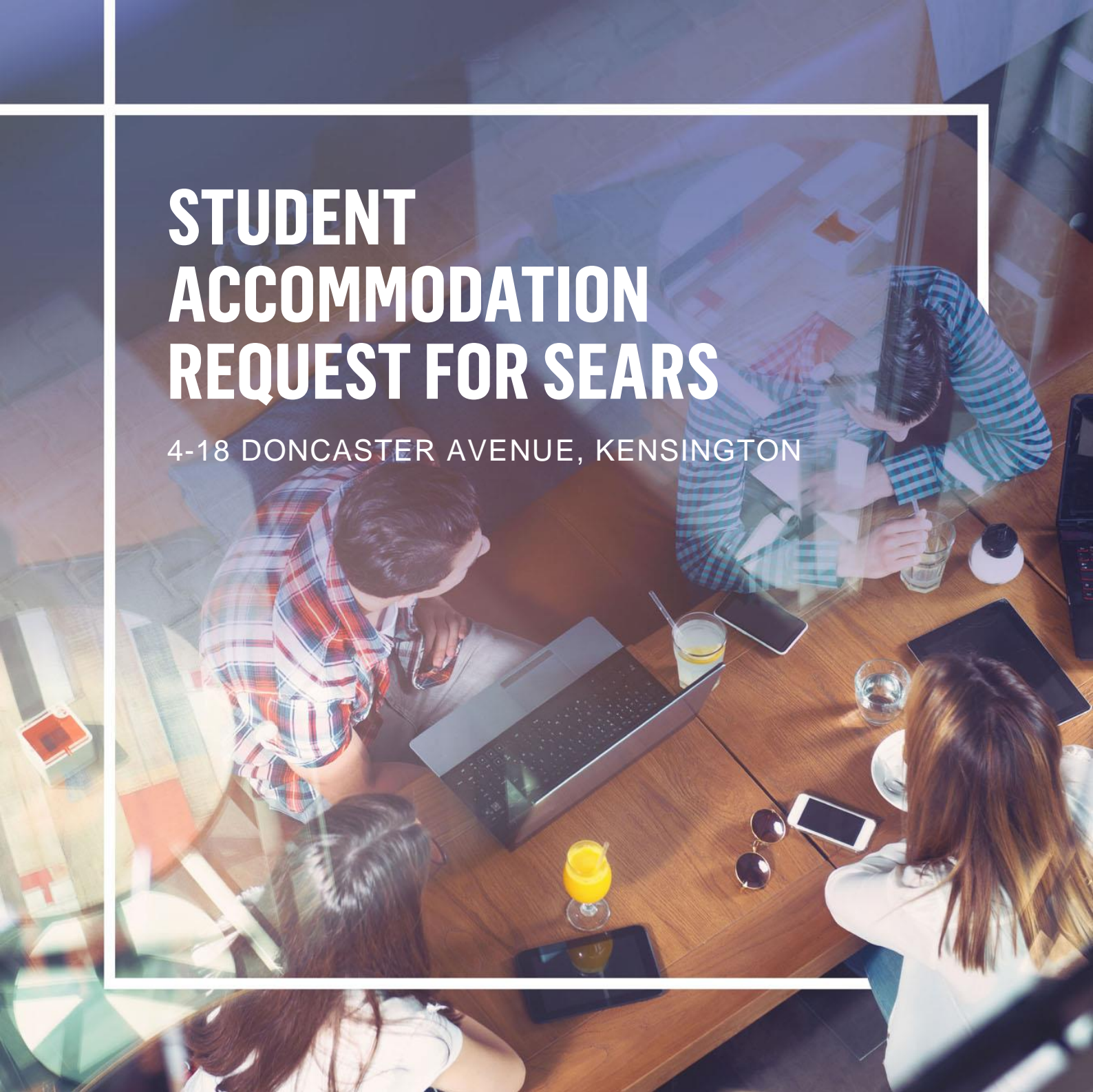


STUDENT ACCOMMODATION REQUEST FOR SEARS

4-18 DONCASTER AVENUE, KENSINGTON



28 SEPTEMBER 2018
PREPARED FOR BLUE SKY PRIVATE REAL ESTATE



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Stephen White
Associate Director	Ashleigh Ryan
Senior Consultant	Ryan Gill
Project Code	P00001379
Report Number	FINAL

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1. INTRODUCTION

This document has been prepared by Urbis Pty Ltd on behalf of Blue Sky Private Real Estate (the applicant) in relation to a proposed student accommodation (boarding house) development at 4-18 Doncaster Avenue, Kensington.

In accordance with Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), this document is a request for Secretary's Environmental Assessment Requirements (SEARs) for the above development.

The proposed development is declared to be State significant development as it is proposed to be carried out on land identified as being within the **Royal Randwick Racecourse Site** and will have a capital investment value (CIV) of more than \$10 million. A statement from a qualified quantity surveyor confirming the CIV of the project is provided at **Appendix B**.

The purpose of this report is to provide information to support the request to the Secretary. To assist in identifying the SEARs for the preparation of an Environmental Impact Statement (EIS) for the proposed development, this report provides:

- An overview of the site and context;
- A description of the proposed development;
- An overview of the relevant planning framework and permissibility; and
- An overview of the likely environmental and planning impacts.

This request for SEARs report should be read in conjunction with the supporting preliminary drawings provided at **Appendix A**.

2. SITE AND LOCALITY

2.1. SITE LOCATION AND DESCRIPTION

The site is located at 4-18 Doncaster Road, Kensington and comprises several lots. The street address and corresponding legal description of each lot is provided at **Table 1**. The site is rectangular in shape with a frontage to Doncaster Avenue of 106.4m and a depth of 40.2m. The site area is 4,275sq.m.

Table 1 – Legal description

Street address	Legal description
4-8 Doncaster Avenue	Lot 2 Section 30 DP 5549
	Lot 3 Section 30 DP 5549
	Lot 1 DP 1094702
	Lot 1 DP 974821
10 Doncaster Avenue	Lot 1 DP 981704
	Lot 1 DP 1033442
12 Doncaster Avenue	Lot 51 DP 2905
14 Doncaster Avenue	Lot 52A DP 400051
16 Doncaster Avenue	Lot 52B DP 400051
18 Doncaster Avenue	Lot 53 DP 2905

The site presently contains a number existing single to two storey dwellings, including a locally heritage listed semi-detached pair of dwellings, distributed across the lots. 18 Doncaster Avenue is presently vacant and has historically been used as informal access to the Randwick Racecourse precinct.

Vehicular and pedestrian access to the lots comprising the site are from Doncaster Avenue.

A number of established trees as well as smaller shrubbery and vegetation exist across the site, with a prominent cluster situated at the north-western end of the site and visible on the southern approach along Doncaster Avenue.

A Sydney Water asset runs east-west across the northern portion of the site.

An aerial image is provided at **Figure 1**.

Figure 1 – Aerial image



A locality image is provided at **Figure 2** demonstrating the location of the site in relation to Randwick Racecourse, Centennial Park, and the Sydney CBD.

Figure 2 – Locality diagram



The site is situated in close proximity to the Carlton Street light rail stops and is a reasonable walking distance to Kensington Town Centre (within 500m) and the University of New South Wales Kensington Campus (within 1.2km). The site is highly accessible via public transport and is in close proximity to bicycle paths, which with the proximity to the University makes the site well suited to student accommodation.

2.2. SURROUNDING DEVELOPMENT

Development in the immediate locality is characterised by residential land uses comprising single dwellings, semi-detached dwellings and, primarily, three to four storey residential flat buildings. Development on the western side of Doncaster Avenue, opposing the site, is almost exclusively comprised of residential flat buildings. Further to the west of the site is the Kensington Town Centre, which is affected by the draft Kensington to Kingsford Strategy, which received conditional gateway determination in December 2017.

The preliminary architectural package provided at **Appendix A** includes a sheet illustrating the relationship between the proposed building scale and massing arrangement and the existing residential flat building development on the western side of Doncaster Avenue.

The site to the east, formerly part of the Randwick Racecourse site, is now occupied by the recently developed light rail holding yard. The holding yard is a low-rise structure with substantial floor plate. The structure extends the length of the subject site (and beyond) with a large masonry wall presenting to the eastern property boundary of the subject site.

To the south of the subject site are a series of single storey brick dwellings, the nearest of which is situated a nominal distance from the southern property boundary of the subject site. This interface is sensitive in the sense that it is situated on the southern side of the property and are inherently vulnerable to overshadowing. The proponent is mindful of this and will design the development to mitigate impacts accordingly.

A contextual analysis is provided within the architectural package at **Appendix A** and illustrates proximity to University facilities, the Kensington Town Centre and existing and developing public transport routes.

3. PROPOSED DEVELOPMENT

This request for SEARs relates to a proposed boarding house (student accommodation) development delivered under the provisions of *State Environmental Planning Policy (Affordable Rental Housing) 2009*. A preliminary architectural package has been prepared by Hayball Architects to inform the SEARs and are provided at **Appendix A**.

The development is described as follows:

- **Demolition** of existing dwellings and associated structures with the exception of the locally heritage listed semi-detached pair of dwellings at Nos. 10 and 12 Doncaster Avenue which are proposed to be retained and repurposed.
- **Construction of a three-storey boarding house development** comprising:
 - A gross floor area of 5,985sq.m which equates to a floor space ratio of 1.4:1.
 - Approximately 280 rooms, including a combination of rooms with private facilities and 'clusters' that rely on communal facilities. A development summary sheet detailing the indicative composition of rooms types is provided within preliminary architectural package at **Appendix A**.
 - Several communal rooms distributed over the three levels of the development with an aggregate area of 420sq.m.
 - Ground level 'administration' space 31.3sq.m in area contained within the repurposed heritage building.
- A single level of **basement parking** designed to accommodate 60 car parking spaces, 59 motorcycle spaces and 59 bicycle spaces. Space for plant has also been identified on the preliminary drawings. The configuration and extent of basement parking is dictated to some degree by the presence of the heritage item and Aboriginal relic on the neighbouring site to the east.

4. PLANNING FRAMEWORK

The relevant statutory planning policies and guideline documents that apply to the proposed development are as follows:

- *State Environmental Planning Policy (State and Regional Development) 2011*;
- *State Environmental Planning Policy No.55 – Remediation of Land*
- *State Environmental Planning Policy (Affordable Rental Housing) 2009*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *Randwick Local Environmental Plan 2012*
- *Randwick Development Control Plan 2013*

4.1. STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) identifies development that is State significant development.

The proposal is declared to be State significant development as it is proposed to be carried out on land identified as being within the **Royal Randwick Racecourse Site** and will have a capital investment value of more than \$10 million. A cost summary report is provided at **Appendix B**.

It is noted that part of the site falls outside the Royal Randwick Racecourse Site, being Lot 52A and 52 B in DP 400051, however pursuant to clause 8(2) of the SRD SEPP, the whole development is declared to be State significant development as development proposed across these allotments is inherently relating to the State significant development. **Figure 3** illustrates the site boundary in relation to the SSD area boundary.

Figure 3 – Royal Randwick Racecourse SSD precinct



4.2. STATE ENVIRONMENTAL PLANNING POLICY NO.55 – REMEDIATION OF LAND

State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55) provides a State-wide planning approach to the remediation of contaminated land and aims to promote the remediation of contaminated land for the purposes of reducing the risk of harm to human health. The instrument does so by specifying certain considerations that are relevant in determining development applications.

Clause 7 requires the consent authority to consider whether land is contaminated prior to granting consent to a development application.

Accordingly, the necessary contamination investigations will be undertaken, findings will be documented and reported as part of the EIS.

4.3. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of infrastructure in the State by, among other things, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

Clause 104 designates certain types of development as traffic generating development and requires that development applications be referred to the RMS for consideration prior to determination of the development application.

At present the driveway is situated beyond 90m from the intersection of a classified road and therefore does not trigger referral under clause 104. If access to the site is refined and falls within the 90m distance, the proposal will constitute traffic generating development by virtue of the number of boarding rooms proposed, and the number of associated car parking spaces.

The EIS will be supported by a traffic and parking assessment addressing, among other things, the relevant considerations of clause 104 of the ISEPP.

4.4. STATE ENVIRONMENTAL PLANNING POLICY (AFFORDABLE RENTAL HOUSING) 2009

State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP) aims to provide a consistent planning regime for the provision of affordable rental housing and to facilitate the effective delivery of new affordable rental housing by providing incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards. The ARH SEPP applies to the State.

The proposal is for student accommodation which is best characterised as a *boarding house* development. The provisions of the ARH SEPP apply to a boarding house development. Part 2 Division 3 of the ARH SEPP sets out mandatory standards for boarding houses, and standards that cannot be used to refuse development consent if achieved.

The proposed development illustrated at **Appendix A** has been designed to satisfy the mandatory standards for boarding houses established in clause 30 of the ARH SEPP. This includes provision of community living rooms, maximum floor space for boarding rooms, provision for a boarding house manager, and minimum parking spaces for bicycles and motorcycles.

The proposed development has been designed to satisfy the standards that cannot be used to refuse consent under clause 29 of the ARH SEPP, with the exception of:

- development density (clause 29(1)); and
- parking provision (clause 29(2)(e)).

The proposed development would otherwise satisfy clause 29(1) for development density if the heritage listed item was excluded from the site area. Notwithstanding this provision, the EIS will demonstrate that the additional 0.5:1 FSR can be accommodated on the site without adverse environmental impacts.

The proposed development seeks to provide a parking provision departing from clause 29(2)(e) due to the high accessibility of the site, demographics of the future users of the development, and precedent of other student accommodation operated by the applicant.

It is noted that these standards are not development standards in the traditional sense, but rather 'reverse development standards' which establish thresholds that, if complied with, cannot be used by the consent authority as a reason to refuse consent.

Clause 29(4) functions to permit the consent authority to consent to development that does not accord with the reverse development standards set out in clause 29(1) or (2). For completeness, and to avoid any conjecture as to the procedural requirements associated with varying a reverse development standard, a variation request pursuant to clause 4.6 of *Randwick Local Environmental Plan 2012* will be prepared in relation to the density and parking variations sought.

Again, the intent is to comply with all relevant development standards with the exception of those noted above, and a detailed assessment of compliance with the ARH SEPP will be provided as part of the EIS.

4.5. RANDWICK LOCAL ENVIRONMENTAL PLAN 2012

The site is within Zone R3 Medium Density Residential under the provisions of *Randwick Local Environmental Plan 2012* (RLEP). A zoning map extract is provided at **Figure 4**. Boarding house development is permissible in Zone R3 with consent. The relevant objectives of Zone R3 are as follows:

- *To provide for the housing needs of the community within a medium density residential environment.*
- *To provide a variety of housing types within a medium density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To recognise the desirable elements of the existing streetscape and built form or, in precincts undergoing transition, that contribute to the desired future character of the area.*
- *To protect the amenity of residents.*
- *To encourage housing affordability.*

The boarding house proposal is consistent with the objectives of the land use zone in the sense that it will increase the quantum of affordable student accommodation in the locality in a building form that is consistent with the medium density context.

Figure 4 – Zoning map extract



Comments against applicable provisions of RLEP are provided at **Table 2**.

Table 2 – RLEP controls

Control	Provision	Comment
4.3 Height of buildings	12m	The proposal will align with the maximum height of buildings development standard i.e. is <12m.
4.4 Floor space ratio	0.9:1	The proposal seeks to rely on the 'bonus' 0.5:1 FSR permitted under ARH SEPP.
5.10 Heritage conservation	Development consent is required to alter a heritage item or to erect a building within a heritage conservation area.	The site contains a heritage item (I122) and is within a heritage conservation area C13. A heritage impact statement (HIS) will be prepared to inform the proposal and support the EIS.
6.10 Essential services	Adequate arrangements for essential services must be made before development consent can be granted.	Documentation will be produced to demonstrate that nominated essential services are available to support the development.

The EIS will address, in detail, the provisions of RLEP and will be supported by technical inputs as necessary.

4.6. RANDWICK DEVELOPMENT CONTROL PLAN 2013

The Randwick Development Control Plan 2013 (RDCP) provides detailed controls for specific development types, including boarding house development, as well general controls that apply to all development applications including controls relating to design, heritage, landscaping, waste management, traffic and parking and water management.

While not a consideration for State significant development, the controls contained within RDCP will be considered within the EIS, for completeness.

4.7. STRATEGIC PLANNING FRAMEWORK

The following strategic planning documents are applicable to the subject site and proposed development:

- NSW State Priorities
- A Metropolis of Three Cities: The Greater Sydney Region Plan
- Eastern City District Plan
- NSW Long Term Transport Master Plan 2012
- Sydney's Cycling Future 2013
- Sydney's Walking Future 2013
- Healthy Urban Development Checklist, NSW Health

5. LIKELY PLANNING IMPACTS

5.1. BUILT FORM AND URBAN DESIGN

A design statement will be prepared by project architects to support the EIS. This design statement will describe the design intent of the proposal and address the local area character provisions at clause 30A of ARH SEPP. A schedule of materials and finishes will also be provided with the architectural package.

5.2. ENVIRONMENTAL AMENITY

The project architect will produce solar access diagrams to demonstrate that the development will enjoy a high degree of amenity with respect to solar access.

The project architect will also produce shadow diagrams to demonstrate the anticipated shadow impacts of the development on those sensitive land uses to the south of the site. Shadow impacts can be mitigated through building siting and setbacks. Regarding privacy impacts on adjoining properties, boarding rooms are oriented primarily to the street or the eastern property boundary (non-sensitive interface) thus mitigating potential for overlooking.

5.3. FLORA AND FAUNA

An aboricultural assessment will be undertaken and subsequent report prepared documenting proposed tree removal and measures to protect trees to be retaining. It is anticipated that several of the established trees, including those at the northern end of the site, can be retained and protected.

No mapped significant vegetation or critical habitat exists on the site.

5.4. HERITAGE

The development involves the repurposing of a heritage listed pair of semi-detached dwellings and is within a heritage conservation area. Accordingly, a heritage consultant will guide design development and will be engaged to prepare a heritage impact statement to support the EIS. Potential impacts to the retained heritage item will be mitigated through building siting, building materials, and adaptive reuse of the semi-detached dwellings to form part of the development.

Consideration will also be given to Aboriginal archaeology in light of the fact that there is a known relic situated on land immediately to the east which has been identified in a AHIMS search. The exclusion zone around this relic is marked on the architectural package at **Appendix A**.

5.5. CONTAMINATION

As required by SEPP 55, a preliminary contamination assessment will be undertaken to determine if any further contamination investigation and subsequent remediation works are required in order to make the site safe for the proposed residential purposes. The site is historically used for residential purposes (with the exception of the informal access to the racecourse) and therefore it is considered unlikely that the site cannot be made suitable for the proposed use.

5.6. TRANSPORT AND ACCESS

The site is well located in terms of its accessibility to light rail routes and local services and facilities, including the University of NSW Kensington Campus. Accordingly, the proposal seeks to leverage this opportunity through the delivery of facilities and services that facilitate sustainable transport options rather than private vehicle use.

A traffic and parking assessment will be undertaken by a suitably qualified traffic consultant to address the parking and access requirements of ARH SEPP and RDCP, along with relevant Australian Standards, and also to analyse potential traffic implications of the proposed development.

5.7. NOISE AND VIBRATION

The communal open space and living rooms are proposed to be positioned to avoid adverse impacts on the acoustic amenity of neighbouring sensitive land uses. The communal spaces are 'internalised' or present to the street or non-sensitive land use to the east. An acoustic assessment will be undertaken and subsequent report prepared to support the EIS.

A boarding house plan of management will also be prepared to detail management and operational measures that will be employed to mitigate potential acoustic impacts.

5.8. WATER MANAGEMENT

It is envisaged that stormwater can be suitably managed and drained to the street and this will be detailed in a drainage concept prepared by a suitably qualified drainage consultant. The concept will identify necessary stormwater retention and water quality measures.

5.9. BUILDING CODE OF AUSTRALIA AND ACCESSIBILITY

The boarding house will be designed to comply with the Building Code of Australia and the EIS will be supported by a statement of compliance and accessibility report prepared by suitably qualified BCA and access consultant. It is noted that accessible boarding rooms are proposed to be included in the development.

5.10. WASTE MANAGEMENT

Demolition and construction and waste management will be addressed by way of a waste management plan. The waste management plan will also address operational waste which will detail movement of waste within the site, storage of waste and approach to collection.

5.11. SOCIAL AND ECONOMIC IMPACTS

The proposal will have a positive social and economic impact in the sense that it will greatly improve the quantum of affordable student specific accommodation in an area that is proximate to the University of NSW Kensington Campus, local services and public transport routes.

Detailed assessment of the social and economic impacts of the proposal will be contained within the EIS.

5.12. CONSULTATION

Prior to lodging this request for SEARs, the applicant and their consultant team have met with representatives from Randwick City Council (3 August 2018 & 26 September 2018) and Department of Planning and Environment (DPE) staff.

The following stakeholders will have an interest in the proposal and will be consulted with:

- DPE
- Randwick City Council
- RMS
- Transport for NSW (TfNSW)
- Sydney Water
- Community stakeholders

6. CONCLUSION

This document is a request for Secretary's Environmental Assessment Requirements (SEARs) in relation to a proposed student accommodation (boarding house) development at 4-18 Doncaster Avenue, Kensington. The boarding house development will deliver approximately 280 boarding rooms in a highly accessible location in close proximity to the University of NSW Kensington Campus.

This request for SEARs has detailed the site and the proposal and given consideration to the statutory framework applicable to the development and the land, as well as the potential impacts of the proposal. The EIS will explore these impacts and will be supported by several consultant inputs. We trust the information contained herewith is sufficient to inform the SEARs.

DISCLAIMER

This report is dated 28 September 2018 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Blue Sky Private Real Estate (**Instructing Party**) for the purpose of Request for SEARS (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A ARCHITECTURAL PACKAGE

APPENDIX B CIV LETTER



BRISBANE

Level 7, 123 Albert Street
Brisbane QLD 4000
Australia
T +61 7 3007 3800

MELBOURNE

Level 12, 120 Collins Street
Melbourne VIC 3000
Australia
T +61 3 8663 4888

PERTH

Level 14, The Quadrant
1 William Street
Perth WA 6000
Australia
T +61 8 9346 0500

SYDNEY

Level 23, Darling Park Tower 2
201 Sussex Street
Sydney NSW 2000
Australia
T +61 2 8233 9900