

2 March 2026

TfNSW Reference: SYD26-00173/01
DPHI Reference: SSD-106869710



Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2150

Attention: Caitlin Hopper

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
MIXED USE DEVELOPMENT AND CONCURRENT AMENDMENT TO PLANNING CONTROLS
77 – 103 ANZAC PARADE AND 59A - 71 BORONIA STREET, KENSINGTON**

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) with an opportunity to provide input to the draft Secretary's Environmental Assessment Requirements (**SEARs**).

TfNSW has reviewed the Scoping Report (prepared by Architectus, Issue D, dated 9 February 2026) and provides assessment requirements and comments in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

If you have any further inquiries in relation to this matter, please contact Andrew Lissenden, Land Use Planner, on 0418 962 703, or by email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Aleks Tancevski".

Aleks Tancevski
Senior Manager Land Use Assessment Eastern
Transport Planning Branch
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TAB A – TfNSW Assessment Requirements and Comments

1. **Transport Impact Assessment (TIA)**: A TIA shall be prepared in accordance with the *Guide to Transport Impact Assessment (GTIA)*. GTIA replaces the Guide to Traffic Generating Developments and can be found at this [link](#). The TIA will enable TfNSW to understand the impacts the development may have on the transport network, as well as the impacts to the state classified road network resulting from increased vehicular, bus and pedestrian/active transport movements. The TIA must include, but not be limited to, the following:
 - a) An assessment of the impacts of the local road connections with the classified road network. This includes, but is not limited to, the Traffic Control Signals at the intersection of Todman Avenue and Anzac Parade, noting the increase in turn movements at this intersection.
 - b) Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development.
 - c) Measures to integrate the development with the existing/future public transport network. Specifically, the capacity of surrounding regional and local roads, as well as public transport, to accommodate the increased residential development and proposed retail offering.
 - d) Measures to ensure all vehicular access to/from the site is from local roads. TfNSW does not support direct access to a classified road (i.e. Anzac Parade) where local road access is available. This is supported by the provisions in Section 2.119 of *State Environmental Planning Policy (Transport and Infrastructure) 2021 (SEPP 2021)*.
 - e) A review of the crash data along the identified transport route/s and key nearby intersections for the most recent 5-year reporting period, and an assessment of the safety implications of the proposed development and required mitigation measures.
 - f) Details of the site access and pedestrian network and parking provision associated with the proposed development, in accordance with the relevant Australian Standards, Austroads Guide and Council's Development Control Plan (DCP). The above should include swept paths for the vehicular access and routes taken to demonstrate that the largest vehicle required to access the site can undertake all required manoeuvres.
 - g) Plans demonstrating how all vehicles likely to be generated during construction can be accommodated on the site to avoid impacts to the transport network. A preliminary Construction Transport Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.
 - h) Given the site's proximity to public transport, TfNSW encourages the proposal to minimise the reliance on car usage through providing minimal parking spaces for the residential component of the development and the implementation of Travel Demand Management (TDM) measures. Consideration should be given to introducing maximum parking rates in the planning instrument for the rezoning, which encourages the mode shift to public and active transport modes. TfNSW also encourages the provision of facilities to increase the non-car mode share for travel to and from the site. Details of a location-specific sustainable travel plan (e.g. Green Travel Plan) should be provided. TfNSW notes that the Scoping Report identifies a full-size supermarket which will generate traffic and require parking. Further information, including details on creating a travel plan, can be found at <https://www.nsw.gov.au/driving-boating-and-transport/travel-demand-management>.
 - i) A review of the cumulative impacts of already approved developments in proximity to the subject site, if any.
2. **Active Transport**: The development should ensure its design is reflective of the Connecting NSW Strategy (which replaces the Future Transport Strategy), see [Connecting NSW Strategy | NSW Government](#) and the NSW Active Transport Strategy, including, but not limited to:
 - a) Delivering integrated land use and transport planning, connecting people to their local metro centre and strategic centres within 30 minutes by public transport;
 - b) Enable 15-minute neighbourhoods;
 - c) Deliver connected and continuous cycling networks; and
 - d) Promote safer and better precincts and main streets.
3. **Amendments to Planning Controls**: TfNSW notes that this State Significant Development Application (SSDA) will be accompanied by a concurrent Planning Proposal that seeks to amend the maximum building height and floor space ratios controls for the site, as well as the introduction of an additional permitted use within the R3 zoned land.

Details of the proposed Local Environmental Plan (LEP) amendments to facilitate this development should be provided as part of the Planning Proposal documentation. This should also include particulars of any proposed site-specific DCP to manage any future site re-development in a coordinated manner and to ensure consistency with any agreed concept/master plan.

4. Sydney Light Rail corridor protection: The proposed development is located adjacent to the Sydney Light Rail corridor. Appropriate measures must be implemented to ensure the protection of light rail infrastructure and operations during both the construction and operational phases of the development. The Environmental Impact Statement (**EIS**) is to address and consider any relevant requirements under SEPP 2021 applicable to development adjacent to Sydney Light Rail infrastructure and operations (e.g. Section 2.98, Section 2.99, etc).
5. Stormwater: A concept stormwater plan is required that illustrates the proposed stormwater layout and nominated connection points to the public stormwater system. If discharge is proposed to Anzac Parade, supporting hydraulic calculations should be provided, including discharge rates (L/s) for the 1-in-5, 1-in-10, 1-in-20, and 1-in-100-year rainfall events.
6. Noise: The provisions of Section 2.120 of SEPP 2021 apply to the proposed development, as the annual average daily traffic volume along the adjoining section of Anzac Parade is more than 20,000 vehicles.

As such, the developer will need to demonstrate to the satisfaction of the consent authority that the development can comply with the applicable provisions contained in Section 2.120 of SEPP 2021, specifically in relation to measures to ensure the required noise levels are not exceeded when the building is ready to be occupied.

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13 March 2026

Ref No: D06058149

Attention: Caitlin Hopper
caitlin.hopper@dpie.nsw.gov.au

Dear Caitlin,

Randwick City Council Additional Requirements for Industry-Specific SEARs for 77-103 Anzac Parade and 59A-71 Boronia Street, Kensington (SSD-106869710)

Thank you for the opportunity to contribute additional requirements for the industry-specific SEARs for the State Significant Development Application (SSDA) and concurrent State Rezoning for the proposed development at 77-103 Anzac Parade and 59A-71 Boronia Street, Kensington (SSD-106869710). The Housing Delivery Authority (HDA) recommended the declaration of this proposal and concurrent rezoning as State Significant on 10 October 2025.

The SSDA seeks consent for demolition of existing structures and construction of a new shop top housing development across four buildings, including a ground floor supermarket, retail tenancies and approximately 357 residential apartments above. The apartments are proposed to be housed in two towers of 24 and 20 storey height on the Anzac Parade frontage, and two five storey apartment buildings on Boronia Street. The proposal includes a minimum 15% affordable housing contribution.

The proposed concurrent State Rezoning is to increase the maximum permitted building height (HOB) from the current Alternative Building Height of 31m (9 storeys) under Randwick LEP 2012 to 86m (RL112m, 24 storeys), increase the site density from the current FSR 4:1 to FSR 6.2:1, and include an Additional Permitted Use for the proposed supermarket and shop top housing within the R3 Medium Density Residential zone.

Strategic background

Issues Paper, K2K International Urban Design Competition and Planning Strategy

The Kensington and Kingsford Town Centres (known as K2K) located along Anzac Parade, comprise an important urban renewal corridor in the Randwick City Local Government Area (LGA). The town centres have been subject to a comprehensive planning review undertaken to

address projected population growth and expected demographic changes, support economic development, improve the quality of building design and the public realm, and accommodate the Sydney City to South East Light Rail infrastructure along Anzac Parade.

The Issues Paper was the first step to undertake a comprehensive planning review of the K2K town centres to ensure the planning framework was up to date, robust and well-aligned to meet future needs. It identified several pertinent planning, urban design and public domain challenges affecting the town centres, together with strategic directions to be addressed.

The K2K International Urban Design Competition provided the opportunity for a creative visioning of the town centres and extensive community consultation on the future of the town centres. Ten urban planning principles emerged from the successful competition entrants and guided the preparation of the Planning Proposal and the new K2K section of the Randwick DCP:

- The people's parade - widen Anzac Parade
- Integrate sustainability into precinct
- Walkable green grid – link streets and plazas
- Community spaces and public benefits
- Concentrate activity and built form at nodes
- Nine-ways transformation into civic/transport hub
- Prioritise walking/cycling and public transport
- Make it affordable
- Leverage UNSW and health campus to foster innovation
- Create new and reinvigorated plazas for people to gather

The K2K Planning Strategy built on the findings of the Issues Paper and utilised key ideas from the K2K International Urban Design Competition and the outcomes of the associated consultation. The Strategy contained a range of objectives, strategies and actions to guide the future sustainable growth and development of the town centres.

K2K height strategy

The K2K Planning Strategy established the height strategy for the town centres, with nine storeys (31m) along the Anzac Parade and Gardener's Road frontages, generally stepping down to five storeys (19m) at the interface with the surrounding lower scale R3 Medium Density Residential zone.

Three Strategic Nodes in the urban fabric, at major road intersections (Todman Avenue, Strachan Street/Middle Street and Gardener's Road/Rainbow Street/Bunnerong Road), were permitted to rise to 16 or 18 storeys (51m to 54m, subject to the Sydney Airport height limit in the south of the corridor) to create activity hubs that could be supported by ready access to public transport and vehicular servicing. A density of FSR 4:1 applied generally along the corridor with the three Strategic Nodes permitted a higher density of FSR 5:1.

K2K Town Centres Planning Proposal

The K2K Planning Proposal was underpinned by a robust and comprehensive urban design process using 3D modelling, heritage evaluation, detailed feasibility analysis as well as a suite of technical studies. Council undertook a strategic approach across the whole town centre establishing planning controls that have provided for orderly, consistent and equitable outcomes.

The Kensington and Kingsford Town Centre Planning Proposal legislation was gazetted on 14 August 2020.

Randwick DCP

In November 2020 a new section of Randwick DCP 2013 was published (Part E6 Kensington and Kingsford Town Centres to be repealed once the DCP Stage 2 is published). The DCP was

prepared to support the Randwick LEP 2012 changes, with objectives and controls informed by extensive site and built form analysis and modelling undertaken for these centres. The Randwick DCP is currently in Stage 2 of a comprehensive review and update, with Council endorsing the public exhibition of DCP part *D1 Kensington and Kingsford*. The K2K DCP chapter was reviewed to ensure it remains relevant including references to the current planning framework. The public exhibition period extended from 22 January to the 5 March 2026. The Council report addressing the outcomes of public exhibition is scheduled to be reported to Council in the coming months.

Present day

There are now over 22 major projects currently in process within the K2K corridor. A handful of projects have recently been delivered, several sites have approved DAs, several are in development assessment, and a few projects are at Pre-lodgement stage. This part of Anzac Parade is currently undergoing transformation because of planning changes, and this is evidenced by the multiple cranes, construction sites and scaffolding. Several projects are now completed and operating.

Recommended additional SEARs requirements

Council recommends the following additional requirements to accompany the industry specific SEARs for the proposed development. The following recommendations align with the Issues and Assessment Requirements identified in the 'Development within identified sites and precincts' SEARs (DPHI V1.9, July 2024), nominated by DPHI.

Statutory context (DPHI SEARs Item 1)

Applicable planning instruments, plans and strategies for the proposed development at the subject site include the following:

- Randwick Local Environmental Plan 2012
- Kensington and Kingsford Town Centres – Urban Design Report
- Planning Strategy: Kensington and Kingsford Town Centres
- Draft Randwick DCP 2025 - part D1 Kensington and Kingsford
- Affordable Rental Housing Strategy 2025
- Kensington and Kingsford Town Centres Affordable Housing Plan
- Kensington and Kingsford Town Centres Community Infrastructure Contributions Plan
- Randwick and NSW Social Impact Assessment Guidelines

The site

The proposed consolidated development site is primarily located in the E2 Commercial Centre zone of the Kensington Town Centre, with the northwest corner of the site located in the R3 Medium Density Residential zone. It has a total area of 6,296m² and a street frontage to Anzac Parade of approx. 111m, and to Boronia Street of approx. 89m. The development site is situated in the middle of Kensington Town Centre (known as Block 24 in the DCP) and adjoins 103A Anzac Parade to the south, a two storey brick contributory building, and by a vacant site (71-75 Anzac Parade) to the north.

Randwick DCP - D1 Kensington and Kingsford

It is Council's view that the updated draft DCP prepared for the K2K town centres, endorsed by Council as interim policy, publicly exhibited between 22 January and 5 March 2026, should guide the planning and design development on the site. The DCP provides objectives and planning controls for the centre, including site specific block development controls (Block 24) and detailed design controls. The draft DCP represents Councils current policy applicable to the site.

Any departures from the Randwick LEP 2012 and the interim Randwick DCP part *D1 Kensington and Kingsford*, need to be justified in any SSDA/EIS submitted for the development proposal.

Housing mix

As part of the public exhibition of Randwick DCP Stage 2, the applicable planning requirements for the K2K corridor are included in two sections: *D1 Kensington and Kingsford* and *C2 Medium Density Residential* (with cross references). The draft DCP is a relevant consideration for a concurrent rezoning of this scale. In particular, the draft Randwick DCP Stage 2 part *C2 Medium Density Residential* includes housing mix requirements which should inform the apartment mix for the proposed development.

Minimum non-residential FSR

A minimum non-residential FSR of 1:1 applies to Strategic Node Sites within the K2K town centres to ensure adequate provision of employment floor space as part of future development. This requirement supports economic growth, meets the retail and service needs of future residents and enhances the overall vibrancy of the corridor. The non-residential FSR controls are informed by economic and feasibility analysis and align with the recommendations of the relevant evidence based studies.

The project seeks building heights and densities that are significantly greater than the alternative planning controls that apply to the site under the Randwick LEP 2012. The proposal seeks development standards that are expressly contemplated for the Strategic Node sites. Therefore, in practical terms, the proposal is seeking consideration as a Strategic Node Site itself by varying the urban design approach established for the corridor and supported by the Department through the previous planning proposal. On this basis it is appropriate that a minimum non-residential FSR be applied to this site under the Randwick LEP.

A non-residential FSR is critical to ensure consistency with the adopted strategic planning framework and safeguard employment capacity within the town centre. This should be explicitly required as part of the concurrent rezoning proposal to be submitted with the EIS.

Delivery of a supermarket on the site

Council has consistently sought delivery of a supermarket at this location within Kensington for a considerable period, recognising its critical role in supporting the function and economic viability of the Kensington Town Centre and meeting the daily needs of the local community. This objective is already included in the local planning framework through the inclusion of Clause 4.3A in the Randwick Local Environmental Plan, which is intended to facilitate the delivery of a supermarket by linking additional development capacity to this outcome. Council therefore requests that the LEP be amended to include a clause of similar intent for this site. The new clause should specify that any increase in building height above the Randwick LEP existing height control should only be permitted where development comprises or includes a supermarket, ensuring additional height is directly tied to the delivery of this essential function rather than realise alternative outcomes.

Contributions and public benefit (DPHI SEARs Item 3)

Councillor resolution – large format supermarket and public toilets

At the Ordinary Council Meeting of October 2024, the following Council resolution was made:

Resolution (Hay/Luxford) that:

The General Manager contact the owners of 59A -71 Boronia St and 77-103 Anzac Parade Kensington, to explore the opportunities to amend the DA to include the following:

- *An increase to a large format supermarket (2,000-2,500m²)*
- *Public toilets*
- *Additional parking spaces to support retail activity in the Centre*

A report be submitted to Council once a response is received from the owners of the site.

Subsequent discussions between Council and the Applicant have taken place on several occasions in relation to this resolution. In response, the applicant advised that an alternative scheme incorporating a full line supermarket, public toilets and additional retail car parking provision could only be feasibly achieved with higher intensity development on the site. Council carefully considered the alternative scheme and did not support additional height (two 18 storey tower buildings) and density (FSR 5.38:1). Council's response was that lower heights may be considered across the two towers to achieve public outcomes, stepping down towards the northern end of the site (to ensure compatibility with the 9 storey interface) subject to meeting the Apartment Design Guide and Council's suite of plans that are relevant to the site.

In considering the above, the applicant's SSDA should respond to the Council Resolution, incorporating the large format supermarket, public toilets and additional retail car parking into the design of any future development on the site.

Hill PDA feasibility assessment

Council informed the Applicant that it would commission independent expert feasibility modelling and advice to clarify the threshold of feasibility and for Council to broadly understand if, and to what extent, uplift could be justified to cover the additional net cost of amending the DA/395/2022 approved development scheme.

The preliminary findings were provided to Council by Hill PDA on 1 March 2026 and included an analysis of the DA approved scheme (9 storeys, 197 residential units, FSR 3.6:1) and the Alternative Infill Affordable Housing scheme (20/24 storeys, 365 residential units, FSR 6.2:1).

The preliminary findings showed that the nine storey approved DA/395/2022 scheme with a metro scale supermarket (1,970m²) has a developer margin of 22.7% (16-17% being marginal, 19% being feasible). The 20 and 24 storey twin tower alternative scheme with a large format supermarket (4,000m²), public toilets and additional retail car parking provision, has a developer margin of 28.8% (16-17% being marginal, 19% being feasible).

In summary, the preliminary feasibility findings do not indicate a minimum FSR threshold (break-even point) for Council's requested land use changes, as both options are feasible. The findings indicate that the proposed alternative twin tower scheme has a high level of feasibility, suggesting that there is scope for the building height and density to be reduced to address environmental and amenity impacts, and to align more closely with the built form outcomes contained in the Randwick LEP 2012 - K2K Alternative HOB and FSR planning controls, and Randwick DCP part D1 Kensington and Kingsford, without impacting on the development feasibility.

Further, the preliminary findings indicate that the development could potentially include other public benefits delivered via a VPA, subject to further feasibility testing, commensurate with a Strategic Node Site. For example, an increase to the Council affordable housing contribution rate in perpetuity (via the Council LEP Affordable Housing clause and included in the Special Provisions Map) and/or a contribution towards the design and construction of the Duke Street Plaza public domain upgrade. This is further addressed below Under Community Infrastructure Contribution.

Given the feasibility outcomes, the EIS should include provision for other public benefits in addition to the larger supermarket.

Section 7.12 development contribution

Projects in the K2K town centres are required to pay a Section 7.12 contribution of 2.5%.

Community Infrastructure Contribution (CIC)

The requirements for a CIC contribution are explained in the Randwick DCP part *D1 Kensington and Kingsford*. Delivery of community infrastructure is to be in accordance with the Kensington and Kingsford Town Centres Community Infrastructure Contributions Plan 2019. The details of the proposed CIC are to be addressed in the SSDA.

Design quality (DPHI SEARs Item 5)

Randwick LEP 2012 (Clause 6.11) requires all buildings of 15m or greater in height in the Randwick LGA, to deliver 'the highest standard of architectural and urban design'. Randwick DCP part *D1 Kensington and Kingsford* reiterates this requirement.

The State Design Review Panel (SDRP), convened by the GANSW, provides independent design quality advice for state significant projects in NSW. The size, complexity and significance of the subject development proposal, with the adjoining sensitive local contributory building, warrants review by the SDRP. Matters raised by the SDRP are to be taken into consideration as part of the assessment of design excellence and addressed in the development of the building design.

Alternatively, the subject proposal should be referred to the Randwick Design Excellence Advisory Panel (DEAP) and similarly their report be taken into consideration as part of the assessment of design excellence, and the review comments addressed in the development of the building design.

Built form and urban design (DPHI SEARs Item 6)

The development is significant in scale, with the proposed 20 and 24 storey towers. The tower heights bear no relationship to the desired urban character of the precinct and are not supported by Council, at the proposed HOB of approx. 68.5m and 81.5m, and at a density of FSR 6.2:1.

It should be recognised that if approved at the proposed scale, the development towers would be several stories taller than the tower buildings in the three Strategic Node Sites, undermining the integrity of the K2K Planning Strategy and the current Randwick LEP 2012 HOB controls. The proposal would set an inappropriate precedent for the remaining K2K sites. It also undermines the significant number of K2K DAs approved or in the pipeline. If approved, at 24 and 20 storeys, the towers would form one of the tallest and highest density developments in the Randwick Local Government Area (LGA), in a sensitive location, inconsistent in building height, scale and built form within the K2K town centres; such controls developed as part of an extensive community and stakeholder engagement process over several years.

Council raises the following concerns regarding the planning and diagrammatic design illustrated in the Scoping Report (Architectus, 9 Feb 2026) submitted with the SEARs request and the presentation at the Planning Focus Meeting (BVN, 9 March 2026) held at Council on 9 March:

- The Scoping Report asserts that the revised scheme '*responds to the planning initiatives occurring within the K2K corridor*' and '*is consistent with Council's K2K strategy*', when in fact the proposal is clearly at odds with the height strategy. The strategy only permits taller tower buildings at three key nodes within the K2K town centres. The SSDA/EIS needs to justify the proposed variance from the K2K planning strategy and development controls, including the proposed alternate built form.

- The significant height and the proposed twin tower and podium typology are at odds with the established perimeter built form typology and stands out in the context of the overall built form of the Kensington Town Centre. Rather than two identical tower forms, the massing should step in height, to transition from the predominant nine storey-built form along Anzac Parade to the 18 storey towers at the Strategic Node Site to the south at Todman Avenue. Refer to the diagram below.



- The significant height transition required from the twin tower buildings to the surrounding lower-density areas and sensitive adjacent properties, including the row of adjoining two storey semi-detached dwellings to the southwest should be carefully resolved in the urban design. Issues of scale, solar access and privacy should be a paramount consideration.
- The location and configuration of the proposed through site link is questioned, regarding:
 - Its usefulness in providing a short cut from residential areas to the west of the development to the activity and light rail stop on Anzac Parade, given that the proposed Duke Street Plaza is only a short distance further to the south
 - That the two storey 103A Anzac Parade contributory building (and roof) has been designed to adjoin the party wall of an adjoining building in a row of retail buildings fronting onto Anzac Parade, rather than to define a new public space
 - CPTED - personal safety with a dog leg arrangement and potential blank walls and residential fences that don't provide any activation or passive surveillance.
- Council's preference is for the development scheme to comply with the DCP control plan that locates the east-west through site link near the middle of the block, between the two towers. This would be a more useful location. As discussed, this can be achieved by providing public stairs and lift on the Anzac Parade frontage (potentially combined with a retail entry) linking across the top of the podium (the supermarket continuing below) and connecting through to the Boronia Street footpaths.
- The inclusion of public toilets in response to the Council resolution is supported, and whilst they should not occupy prime retail frontage, none-the-less their location needs to be carefully considered – the current proposed location is questioned as it is located at a rear lane away from passive surveillance and raises significant safety issue.
- The ADG building separation of 11.9m from the front towers and rear apartment buildings, at the podium level, whilst near to ADG compliant, requires detailed design consideration to ensure good apartment outlook and privacy is realised.
- Council supports the applicant's proposed consultation approach, including engaging with key stakeholders, and placing the design proposal before the SDRP for comment, and responding to this feedback in the design of the proposal.
- A Transport Impact Assessment will be important to establish the best interface with Boronia Street and any requirements for vehicular management measures along the street to avoid congestion, ensure safety whilst protecting the attractive residential scale and character of the streetscape.
- As mentioned at the PFM, Randwick Council is on track to meet the DPHI housing target of 4,000 dwellings by 2029. The K2K corridor, has been planned to contribute 2,070 dwellings over the 6-10 year period. This combined with residential development in the

five new Well Located Housing Areas (formally known as HIAs) means that Council is well placed within the current planning framework to meet or exceed our housing target.

- Council believes that the case for the project meeting a 'strong strategic and site specific merit' justification has not been made, and further justification of the variance from the current successful planning framework is required.

Urban design analysis

Given the site's sensitivity and strategic significance, it is essential that the SEARs be augmented to require a comprehensive urban design analysis, addressing the significant height, scale disparity, and potential town centre impacts. The SEARs should also mandate independent testing of view corridors, townscape character, overshadowing and wind effects, as well as massing and interface studies that demonstrate an appropriate response to the adjoining contributory building.

This analysis must show how the proposed built form achieves design excellence, calibrated height and bulk, and high-quality public domain outcomes. Importantly, the built form controls, podium/tower relationships, setbacks, articulation and materiality must explicitly demonstrate consistency with the Randwick DCP part *D1 Kensington and Kingsford*, Block 24 Control Plan.

The development should exhibit an appropriately scaled, contextually responsive, capable of delivering a net public benefit commensurate with the uplift sought. The built form should address the need to:

- Provide a suitable contemporary infill building design that reinforces the K2K vision and planning strategy, that is being delivered across the town centres
- Carefully consider the predominant articulation, proportion and placement of solid wall to window opening, roofscape, architectural elements and detail, and complement the material and finishes of the adjoining contributory building at 103A Anzac Parade
- Provide setbacks, to transition in height from the twin tower buildings down to the main retail four storey street wall that respects the module and small fine grain scale and detail of the Anzac Parade streetscape, the contributory building and to the Boronia Street streetscape
- Consider the generation of activity envisaged at the street level to Anzac Parade and incorporation of proposed new public place that creates a welcoming, comfortable and high quality environment
- Protect the adjoining contributory building and respect its character and small scale
- Provide a consistent four storey street wall façade to realise the proposed future character of the Anzac Parade streetscape
- Provide upper-level setback of 4m above the four storey street wall
- Respect the scale, privacy, solar access and amenity of the 1-7 Duke Street residences
- Transition in height from the twin tower buildings down to the main retail street wall
- Avoid large areas of blank façade, particularly when viewed from major road, vantage points
- Consider the amenity and future development potential of properties that adjoin to the north
- Minimise overshadowing of the future Duke Street Plaza public domain, particularly at winter solstice, during the lunchtime hours of 12noon to 2pm

Environmental amenity (DPHI SEARs Item 7)

Daylight and natural ventilation requirements of the ADG are to be met in the design of the building apartments and retail/commercial spaces, and for adjoining neighbours. Further consideration of building-to-building setbacks between the Anzac Parade buildings and the Boronia Street buildings will be required to ensure appropriate separation and ensure adequate amenity for residents in terms of light and natural ventilation, and to protect privacy and outlook consistent with the ADG.

The potential overshadowing of the Duke Street Plaza public domain, the residents to the south and houses and rear gardens of 1-7 Duke Street, to the south of the proposed development are to be clearly indicated on shadow diagrams, and the additional overshadowing that results from the proposed height exceedance (above that of the Randwick LEP 2012) indicated in a different colour, so that the extra impact can be assessed.

As required by the SEARs, the wind impacts of the proposed tower buildings are to be assessed, and as necessary, mitigation measures adopted and illustrated in the building design.

Visual impact (DPHI SEARs Item 8)

In its present form, the proposal would introduce a visually dominant twin tower element within the K2K town centre corridor, overwhelming the established landmark prominence of the Todman Avenue Strategic Node buildings and the continuous nine storey frontages of Anzac Parade. Such an outcome would:

- Diminish the legibility of the Strategic Nodes in the K2K corridor and urban setting
- Disrupt long established scale definition of the Anzac Parade corridor streetscape
- Undermine the currently coherent townscape character

The Randwick LEP height standard would be exceeded by more than two-and-a-half times and result in a disproportionate building mass that intrudes into the corridor skyline and sits above the established nine storey roofscapes.

The significant scale of the proposed towers, and the sensitive nearby contributory building, warrants a thorough investigation as to the visual catchment area, including identifying the key vantage points within and surrounding the Kensington Town Centre from which the development and particularly the towers would be seen. The scale of the tower and the 3D built form expression within the K2K context needs to be carefully considered, with suitable existing and proposed perspectives at ground eye level prepared, to accurately illustrate the potential visual impacts.

A scale model of the proposal, including the existing surrounding development context, is to be provided at lodgement, as per standard Council DA requirements. This will assist greater understanding by the broader community.

Transport (DPHI SEARs Item 9)

Traffic Impact Assessment (TIA)

Given the scale and density of the proposed development, and proposed supermarket, additional traffic and parking issues should be comprehensively addressed in the EIS. Traffic and transport technical reports should address network capacity, safety, access arrangements, the potential traffic impacts on adjoining streets (such as the Duke Street Plaza street closure) and active transport integration (including bike paths). Furthermore, construction traffic impacts incorporating management plans designed to protect the public domain and surrounding residents should be submitted.

The traffic impact assessment (TIA) must be prepared by a suitably qualified practitioner assessing operational and cumulative traffic, transport and pedestrian impacts on the surrounding road and footpath networks and nearby intersection capacity. The TIA must, at a minimum, address:

- Traffic generation for each development component and network performance impacts, with SIDRA (or equivalent) analysis of adjoining and nearby intersections, and identification of any required road or intersection upgrades
- Vehicle, pedestrian and cyclist safety within and around the site, including desire lines, conflicts, sight distances, access visibility, and risk mitigation

- Servicing, loading/unloading movements, including areas for pick-up/drop-off (PUDO) arrangements, swept paths (Australian design vehicles), dock operations, and queue management without impacting the road network
- On-site car parking supply, allocation and management (incl. accessible/EV bays), justified against location, access characteristics, expected demand and operational needs
- On-street parking impacts, including the removal/relocation of any existing on-street spaces, with mitigation options
- Pedestrian and bicycle infrastructure and facilities on- and off-site, with necessary upgrades (footpaths, crossings, kerb ramps, bicycle lanes, end-of-trip)
- Mode share and demand management assumptions, integrated with the Green Travel Plan (see below).

Green travel, wayfinding and access guides

Preparation of a Green Travel Plan (GTP) that sets targets and actions to increase walking and cycling mode share, reduce private vehicle trips and support sustainable travel for staff, visitors and deliveries. The GTP should include wayfinding strategies and travel access guides to direct users to active/public transport, accessible entrances, bicycle parking, loading docks and PUDO areas; and identify monitoring and reporting, with corrective actions if mode share targets are not achieved under these additional SEARs.

Consultation and approvals

The proponent must consult with TfNSW, PMNSW and Randwick City Council on all relevant traffic, transport, pedestrian and cycling matters through design development, prior to lodgement of the EIS and before finalising the CPTMP, which should be included as additional SEARs. This should also include submission of all technical modelling files (e.g., SIDRA, pedestrian modelling) and assumptions in an appendix for independent review.

Parking rates

The draft Randwick DCP draft part *B7 Transport, traffic and parking* permits one third reduced parking rates (of the Transport NSW Guideline Rates) in the K2K town centres, due to the good access to public transport.

Sustainability

It is recommended that sustainability measures are incorporated in the building design, such as EV charging facilities and infrastructure, dedicated car share facilities, motorcycle and bicycle parking, as per the Randwick DCP draft part *B7 Transport, traffic and parking* rates.

Ground and water conditions (DPHI SEARs Item 12)

Geotechnical assessment is to provide detailed analysis of the hydrological site context in terms of a review of existing basement excavation depths in the subject block and adjacent blocks and make specific recommendations on whether the proposed multi-level basement excavation depth and associated onsite parking provision can be supported in terms of the groundwater table depth and the implications this has on the structural integrity of the development and directly adjoining properties to the south, west and north, in the case of basement drawdown effect.

Contamination and remediation (DPHI SEARs Item 13)

The investigations and where required remediation recommendations, relevant to the subject site, are to be addressed in the preparation of the EIS and building design.

Trees and landscaping (DPHI SEARs Item 14)

The landscaping requirements of Randwick DCP parts *D1 Kensington and Kingsford*, *C2 Medium Density Residential*, and *B4 Landscaping and biodiversity* are to be addressed in the planning and design of the development.

D1 Kensington and Kingsford, section 20. *Landscaped area* requires a Gross Landscape Area equal to 100% of the site area. The landscape area may be spread throughout the building and site, and may include the ground plane, podium gardens, outdoor terraces, planter boxes, sky gardens, roof terraces and green walls.

Where ground level provision of landscaping is not feasible, equivalent on-structure planting may be proposed. Soil depth and volumes are critical to long term success. The ADG part *4P Planting on structures* requirements need to be met to ensure that the proposed landscaping has sufficient depth and soil volume for the planting material, so it establishes and flourishes into the future.

The proposal is to comply with the ADG minimum recommended deep soil requirement for sites greater than 1,500m² (the site is 6,296m² in area) which requires 15% of the site area to be a deep soil zone. The SSDA is to demonstrate how compliance is achieved.

A Deep Soil and On Structure Planting Compliance Report (including soil volume schedules, species, irrigation/drainage and anchorage, and maintenance plan) that delivers canopy, biodiversity and stormwater outcomes no less than ADG objectives, and include a long-term maintenance plan must be prepared.

A minimum 25% tree canopy cover as a percentage of site area is required, calculated as per DCP part *C2 Medium Density Residential*, section 3.3.3 Tree Canopy Cover.

Environmentally Sustainable Development (ESD) (DPHI SEARs Item 15)

Council supports best practice environmentally sensitive design (ESD), energy efficiency, water conservation, waste and resources minimisation for all development in the K2K town centres. The building design should meet the requirements of Randwick DCP part *D1 Kensington and Kingsford*, section 22. *Sustainability* and DCP part *B3 Sustainability and resilience*.

For all development within K2K, Council requires achievement of GBCA 5 Star Green Star certified rating, consideration of PV panels and battery storage, the provision of EV charging points and infrastructure, 100% electric design, reduced parking rates, and car share provision. These minimum requirements are to be addressed in the building design.

Undergrounding of power lines

Details regarding undergrounding of power lines and associated infrastructure along the Boronia Street frontage is to be provided. This should include proposed conduit routes, pit locations. Removal of existing poles and reinstatement works to the satisfaction of Ausgrid.

Social Impact (DPHI SEARs Item 18)

Council's Social Impact Assessment (SIA) Guidelines are applicable to this proposal given that it is proposing more than 50 dwellings. Any submitted proposal must address the likely social impacts, including a thorough assessment of housing needs of essential workers.

Flood risk (DPHI SEARs Item 19)

Flooding assessment recommendations for the subject site are to be addressed in the preparation of the Environmental Impact Statement (EIS) and building design.

Environmental heritage (DPHI SEARs Item 22)

The preservation and restoration of heritage items, including contributory buildings, within the K2K town centres, plays an important role in contributing character to the town centres streetscapes and public places. The urban design and architectural response of any new development in the town centre should respect and embrace heritage buildings and items, such as the adjoining contributory building at 103A Anzac Parade. Being a respectful neighbour, providing a suitable transition in scale, height and detail architectural interface and utilise a complementary materiality.

The Randwick LEP 2012, part 5.10 Heritage conservation, contains objectives to conserve heritage items and Heritage Conservation Areas (HCA) including associated fabric, settings and views, archaeological sites, Aboriginal objects and places of heritage significance.

The Randwick DCP part *B2 Heritage* provides the overall heritage conservation requirements that apply in the Randwick LGA, whilst the Randwick DCP part *D1 Kensington and Kingsford*, section 9 - Heritage Conservation provides design requirements, including objectives and controls for the K2K town centres, specific to contributory buildings, and development adjacent to contributory buildings.

Any proposed significant increase in height and density should be subject to detailed scrutiny and clear justification to ensure the development responds to the sensitive heritage context, achieves design excellence and provides significant public benefit for the town centre and community more broadly.

Considering the site adjoins the contributory building, it is essential that the Environmental Impact Statement (EIS) fully addresses the constraints and opportunities presented by the heritage context, and that any redevelopment achieves high-quality built-form outcomes that respects and enhances the heritage significance of the Kensington Town Centre.

Public space (DPHI SEARs Item 23)

Active street frontage and awning

An active street frontage is required along Anzac Parade. It is noted that this frontage will be predominantly utilised by the supermarket, residential foyers and the pedestrian through site link. Views into the supermarket should be provided, rather than large areas of blank wall or glazing covered with signage or advertising material. An awning is required to the Anzac Parade frontage, as per draft DCP *D1 Kensington and Kingsford*, part 18. Awnings.

Building footpath

A minimum unimpeded ground floor setback of 1.5m is required along the Anzac Parade frontage to facilitate widening of the existing footpath. This setback should be free of permanent obstructions and designed to allow for high quality public domain works. Consideration should be provided to delivering a more generous and legible pedestrian environment particularly in response to the anticipated increase in pedestrian movement associated with the site and planned intensification of the town centre.

Footpath widening will provide additional pedestrian capacity to accommodate increased foot traffic and will enable opportunities for street tree planting and landscaping, contributing to an attractive, comfortable and welcoming streetscape character. Creative and well designed lighting should be included in a Lighting Strategy across the site. Lighting should enhance the streetscape amenity, improve pedestrian safety and surveillance and support the night time economy of Kensington.

Duke Street Plaza

The Randwick DCP part *D1 Kensington and Kingsford* identifies the Duke Street Plaza (street closure and construction of a public plaza) as an important project to provide much needed open space in the Kensington Town Centre. A new plaza is an opportunity to integrate the existing mature trees, replace the existing car parking with attractive paved and landscaped seating areas and public art. There is potential for retail to open onto the plaza to provide outdoor eating, and social interaction.

It will be important to maximise solar access to the southern part of the plaza during the winter months to encourage use all year round. The Meeks Street Plaza, recently completed by Council, is an example of how new public places can be established within the public domain, to provide amenity, and an opportunity for rest, respite and gathering for local residents.

Public art and creative hoardings

The requirements of draft DCP part *B15 Public art and creative hoardings* are to be addressed in the design and construction of the project.

Conclusion

I trust that Council's above recommendations will be taken into consideration in the DPHI's preparation of additional detail requirements provided to complement the Industry Specific SEARs for the SSD and concurrent rezoning. Council understands the fast-track timeline represented by the SSD assessment and approval process and commits to working closely with the DPHI and applicant to realise the best possible outcome for the Kensington Town Centre and our community.

If you would like to discuss any of the recommendations above, please contact David Appleby, Coordinator Strategic Planning on (02) 9093 6982.

Yours sincerely,



Stella Agagiotis

Manager, Strategic Planning

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English 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.	Greek 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.	Italian 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.
Croatian Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dođite u Općinski služni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.	Spanish 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.	Vietnamese 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.
Polish 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.	Indonesian 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.	Turkish 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.
Hungarian 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 Tolmács Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapcsolják a Tanácsházat a 1300 722 542 telefonszámon.	Czech 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.	Arabic إذا أردت مُساعدة لفهم هذه الرسالة، نرجوك الحضور إلى مركز خدمة عملاء المجلس واطْلُب المُساعدة في لغتك، أو يُمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 واطْلُب منهم الاتصال بالمجلس على رقم 1300 722 542.
Chinese 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。	Russian 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.	Serbian 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.

