ENVIRONMENTAL IMPACT STATEMENT

STUDENT ACCOMMODATION

4-18 DONCASTER AVENUE, KENSINGTON

SSD 9649
PREPARED FOR BLUESKY COMMERCIAL ASSET MANAGEMENT PTY LTD

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Stephen White
Associate Director	Ashleigh Ryan; Jayne Klein
Senior Consultant	Ryan Gill
Project Code	P0001379
Report Number	Final

TABLE OF CONTENTS

SIGNED DECLARATION

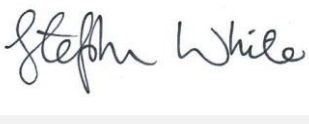
This Environmental Impact Statement (EIS) has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulations 2000.*

Environmental Assessment Prepared by:	
Names:	Ashleigh Ryan (Associate Director) *Bachelor of Planning (Hons 1), University of New South Wales* Stephen White (Director) *Master of Urban Development and Design, University of NSW* *Bachelor of Science (Economy Geography) (Hons), University of NSW*
Address:	Urbis Pty Ltd Level 23, Darling Park Tower 2, 201 Sussex Street Sydney NSW, 2000
In respect of:	Doncaster Avenue, Student Accommodation

Applicant and Land Details:	
Applicant:	Blue Sky Private Real Estate C/- Urbis Pty Ltd
Applicant Address:	Urbis Pty Ltd Level 23, Darling Park Tower 2, 201 Sussex Street, Sydney NSW, 2000
Land to be developed:	4-8, 10, 12, 14, 16 & 18 Doncaster Avenue, Kensington Lots 2 & 3 Section 30 DP 5549, Lot 1 DP 1094702, Lot 1 DP 974821, Lot 1 DP 981704, Lot 1 DP 1033442, Lots 51 & 53 DP 20905, Lots 52A & 52B DP 400051.
Project:	Doncaster Avenue, Student Accommodation

I certify that the contents of the Environmental Impact Statement, to the best of my knowledge, has been prepared as follows:

- In accordance with Schedule 2 of the *Environmental Planning and Assessment Regulations 2000*;
- In accordance with the requirements of the *Environmental Planning and Assessment Regulations 2000*; and *State Environmental Planning Policy (State and Regional Development) 2011*;
- The statement contains all available information that is relevant to the environmental assessment of the proposed development; and
- The information contained in this report is neither false nor misleading.

Name:	Ashleigh Ryan, Associate Director	Stephen White, Director
Signature:		
Date:	Monday, 21 January 2019	Monday, 21 January 2019

EXECUTIVE SUMMARY

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Pty Ltd on behalf of Blue Sky Commercial Asset Management (**the Applicant**) in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulations 2000*. This EIS supports the State Significant Development (**SSD**) Development Application (**DA**) SSD_9649 for student accommodation (boarding house) at 4-18 Doncaster Avenue, Kensington (**the site**).

This EIS responds to the Secretary's Environmental Assessment Requirements (**SEARs**) attached at **Appendix A**. This document should be read in conjunction with the supporting documents provided at **Appendix B – CC**.

THE PROPOSAL

The development is described as follows:

- Demolition of existing structures on site, with the exception of the locally heritage listed semi-detached pair of dwellings at 10 & 12 Doncaster Avenue which are proposed to be retained and repurposed.
- Removal of 42 trees, retention of the significant Sydney Blue Gym (Tree 42) on site, and retention of seven street trees immediately adjacent to the site.
- Construction of a three-storey student accommodation (defined as a boarding house) development comprising:
  - A gross floor area (GFA) of 5,978sqm which equates to a floor space ratio of 1.4:1.
  - A total of 276 beds, including a combination of rooms with private facilities and 'clusters' that rely on communal facilities.
  - Several communal rooms distributed over the three levels of the development with an aggregate area of 374sqm.
  - 498sqm of communal outdoor landscape areas.
- A single level of basement parking including waste and loading areas, 56 car parking spaces, 54 motorcycle spaces and 60 bicycle spaces.

THE SITE

The site is located at 4-18 Doncaster Road, Kensington and comprises several lots. The site is legally described as Lots 2 & 3 Section 30 DP 5549, Lot 1 DP 1094702, Lot 1 DP 974821, Lot 1 DP 981704, Lot 1 DP 1033442, Lots 51 & 53 DP 20905, Lots 52A & 52B DP 400051.

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 4,275sqm.

The site is located immediately to the west of the recently developed light rail holding yard, and to the west of the Royal Randwick Racecourse. 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.

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.

PLANNING FRAMEWORK

The proposal is declared to be SSD pursuant to clause 8 and Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), as it is proposed to be carried out on land identified as being within the Royal Randwick Racecourse Site under and will have a capital investment value of more than $10 million.

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

ASSESSMENT

The proposal has been assessed against all items contained to the SEARS issued for the project on 26 October 2018. In summary:

- The proposal has been designed to be consistent with the relevant goals and strategies contained in *'NSW State Priorities', 'Greater Sydney Regional Plan, 'NSW Long Term Transport Master Plan 2012', Sydney's Cycling Future 2013', 'Sydney's Walking Future 2013', Sydney's Bus Future 2013', 'Healthy Urban Development Checklist, NSW Health', 'Greater Sydney Commission's Draft Central District Plan'* and the *'Randwick Development Control Plan 2013'*.
- The proposal satisfies the objectives of all relevant planning controls and achieves a high level of planning policy compliance. Where departures to the local development standards are proposed pursuant to clause 4.6 of the standard instrument local environmental plan and Division 3 of the *State Environmental Planning Policy (Affordable Rental Housing) 2009* including floor space ratio and car parking, justification is provided.
- The design positively responds to the site conditions and existing streetscape character of the locality by introducing architectural features and breaks within building forms that reflect the tradition subdivision of the locality. Further the building complies with the maximum height of buildings control that is consistent with surrounding development, and provides significant setbacks and landscaping to the existing heritage item on the site. The proposed development provides generous landscaped front setbacks that reflect the character of the local area.
- The proposal will contribute positively to energy efficiency and environmental sustainability.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unreasonable impacts on adjoining properties or the public domain in terms of traffic, social and environmental impacts.
- The site is ideally suited to student accommodation and is well serviced by public transport and various walking and cycling routes. The proposal greatly encourages the use of non-private vehicle options to access the site.
- The proposed development will positively contribute to the local economy and provide a diversity of residential accommodation that suits the demographic trends of the area and the growing demand for purpose built student accommodation. The development also includes a variety of room types to accommodate varying student needs.
- The proposal satisfies the SEARS as demonstrated within this EIS.

Considering the above and the content contained in this EIS, it is recommended that the DPE approve this SSD DA with appropriate conditions.

SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

A request was made to the Minister for Secretary's Environmental Assessment Requirements (**SEARs**), pursuant to clause 3, Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*. The SEARs issued on 26 October 2018 are addressed below.

Item/ Description	Document Reference
General Requirements	
The EIS must be prepared in accordance with, and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the Regulation. Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development. Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include: • Adequate baseline data; • Consideration of potential cumulative impacts due to other development in the vicinity (completed, underway or proposed); and • Measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment. • Justification of impacts	The EIS has been prepared in accordance with the Secretary's Requirements and meets the minimum form and content requirements specified in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*. The EIS includes a comprehensive assessment of the environmental risks and impacts associated with the development. Environmental Risk Assessment at **Section 11**.
The EIS must be accompanied by a report from a qualified quantity surveyor providing: • A detailed calculation of the CIV of the proposal, including details of all assumptions and components from which the CIV calculation is derived; • An estimate of the jobs that will be created by the future development during the construction and operational phases of the development; and • Certification that the information provided is accurate at the date of preparation.	Refer **Appendix B**
KEY ISSUES The EIS must address the following specific matters:	
1. Statutory and Strategic Context Address the statutory provisions contained in all relevant EPIs, including: • State Environmental Planning Policy (State & Regional Development) 2011 • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy (Affordable Rental Housing) 2009	Refer **Section 7** of this EIS

Item/ Description	Document Reference
• State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 • State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 • State Environmental Planning Policy No. 55 – Remediation of Land • State Environmental Planning Policy No. 64 – Advertising and Signage • Draft State Environmental Planning Policy (Environment) 2017 • Draft State Environmental Planning Policy No. 55 – Remediation of Land • Randwick Local Environmental Plan 2012 Address the relevant provisions, goals and objectives in the following: • NSW State Priorities • Premier's Priorities • A Metropolis of Three Cities • Eastern City District Plan • Future Transport 2056 • Better Placed: An integrated design policy for built environment of NSW • Guide to Traffic Generating Developments (Roads and Maritime Services) • NSW Planning Guidelines for Walking and Cycling • NSW Bicycle Guidelines • Cycling Aspects of Austroads Guides • Sydney's Cycling Future 2013 • Sydney's Walking Future 2013 • Randwick City Council Section 94A Development Contributions Plan 2015	Refer **Section 6** of this EIS
2. Design Excellence The EIS shall include a design excellence strategy prepared in consultation with the Government Architect NSW, demonstrating how the proposal will achieve design excellence. This strategy shall: • identify the process to ensure that design excellence is achieved, including consideration of the role of the State Design Review Panel • demonstrate how comments in response to the design excellence process have been addressed • include Crime Prevention Through Environmental Design principles (CPTED).	Refer to **Appendix C**, **Section 3.2**, and **Section 8.2.1** of this EIS
3. Built Form and Urban Design The EIS shall:	Refer to **Appendix C**, **Appendix E**, **Section 7**, **Section 8.1** and **Section 8.3** of this EIS

Item/ Description	Document Reference
• demonstrate how the layout, orientation, height, setbacks, massing, materials, activation and pedestrian connectivity of the proposal will fit within the context of the existing and future character of the area • demonstrate how the built form, design and materiality will integrate with the character of the Racecourse heritage conservation area, including the consideration of any impacts on the heritage item 10-12 Doncaster Avenue • provide an analysis of the proposed built form compared to applicable development standards and controls • include a floor-by-floor breakdown of gross floor area (GFA), total GFA and FSR, and site coverage • consider opportunities for Aboriginal culture and heritage, developed in consultation with local Aboriginal community and cultural groups, and incorporated holistically in the design proposal.	Refer to **Section 8.1.3** of this EIS
4. Amenity • address how the proposal achieves a high level of environmental and residential amenity including consideration of solar access, acoustic impacts, natural ventilation, visual privacy, and noise and vibration emanating from the adjoining light rail holding yard • demonstrate the impacts of the proposal on the amenity of surrounding development and public domain, including measures to minimise potential overshadowing, noise, visual privacy, wind, daylight and view impacts.	Refer **Appendix C** and **Section 8.1** of this EIS Refer **Section 4.4** and **Section 11** of this EIS
5. Noise and vibration The EIS shall include a noise and vibration assessment prepared in accordance with the relevant EPA guidelines. This assessment must detail construction and operational noise impacts on nearby noise sensitive receivers and outline proposed noise mitigation and monitoring procedures.	Refer to **Appendix O** and **Section 8.1.5** of this EIS
6. Air quality, odour and waste The EIS shall identify potential air quality, odour and waste impacts during the construction of the development and include any appropriate mitigation measures.	Refer to **Appendix Q** and **Section 8.1.8** of this EIS
7. Heritage and archaeology The EIS shall: • include a Heritage Impact Statement (HIS) prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual. The HIS is to address the impacts of the proposal on any heritage significance of the site and adjacent areas • identify any areas with historical archaeological potential within the proposed site that could be impacted by the works. If impact on potential archaeology is identified, a Historical Archaeological Assessment (HAA) should be prepared by a suitably qualified historical archaeologist in accordance with the Heritage Council Guidelines	Refer to **Appendix H** and **Section 8.1.3** of this EIS Refer to **Appendix I** and **Section 8.1.3** of this EIS

Item/ Description	Document Reference
for Archaeological Assessment (1996) and Assessing Significance for Historical Archaeological Sites and 'Relics' (2009). This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential archaeological resource	
• include an Aboriginal Cultural Heritage Assessment Report (ACHAR) that identifies and describes Aboriginal cultural heritage values that existing across the area affected by the development, prepared in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW, and guided by Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW	Refer to **Appendix J** and **Section 8.1.3** of this EIS
• document consultation with Aboriginal people undertaken and documented in accordance with the Aboriginal Cultural heritage consultation requirements for proponents 2010 (DECCW).	Refer to **Appendix K** and **Section 8.1.3** of this EIS
8. Biodiversity The EIS shall provide an assessment of the proposal's biodiversity impacts in accordance with the *Biodiversity Conservation Act 2016*, including the preparation of a Biodiversity Development Assessment Report where required under the Act.	Refer to BDAR Waiver and preliminary Ecological Assessment at **Appendix N** and **Section 7.1** of this EIS
9. Operation The EIS shall include a draft Management Plan in accordance with the relevant Randwick City Council guidelines.	Refer to **Appendix AA** and **Section 4.4** of this EIS
10. Transport, traffic, parking and access The EIS must include a Transport and Traffic Impact Assessment that provides, but is not limited to, the following: <u>Operational</u> • current and estimated daily and peak hour traffic generation, public transport, point to point transport, walking and cycling movements, together with cumulative impacts of existing, proposed and approved developments within the vicinity of the proposed development and any transport/ traffic upgrade • impacts of additional traffic generated by the development on existing and future road, pedestrian and cycle networks within the vicinity of the site • proposed car and bicycle parking provision for staff, residents and visitors, including consideration of the availability of public transport and the requirements of the relevant parking codes • loading and servicing arrangements • measures to be implemented to encourage users of the development to make sustainable travel choices • an assessment of traffic and pedestrian safety with the proposed development. <u>Construction</u>	Refer to **Appendix L** and **Section 8.1.4** of this EIS

Item/ Description	Document Reference
• an assessment of traffic and transport impacts during construction, including cumulative impacts associated with other construction activities • details of construction vehicle routes, peak hour and daily truck movements, hours of operation, access arrangements at all stages of construction and traffic control measures for all works • including the preparation of a draft Construction Pedestrian Traffic Management Plan. • an assessment of construction impacts on road safety at key intersections and locations for potential pedestrian, vehicle and bicycle conflicts • details of any temporary cycling and pedestrian access during construction • details of access arrangements for workers, emergency services and the provision for safe and efficient access for loading and deliveries.	
11. Sydney Light Rail maintenance facility (Stabling Yard) The EIS shall undertake the assessment to identify the impacts of the Sydney Light Rail maintenance facility on the proposed development and the impacts of the proposed development on the Sydney Light Rail maintenance facility. This assessment shall include but not limited to the following: • protection of TfNSW land, easements or infrastructure during construction and operation • geotechnical investigation for the excavation for the proposed development adjacent to the Sydney Light Rail maintenance facility • noise assessment and associated acoustic treatments for the proposed development • electrolysis risk to the development from stray currents from the Sydney Light Rail maintenance facility.	There are no TfNSW easements likely to be affected by this application. Refer to **Appendix R** Refer to **Appendix O** Refer to **Appendix T**
12. Ecologically Sustainable Development (ESD) The EIS shall: • detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*) will be incorporated in the design and ongoing operation phases of the development. • include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy.	Refer **Appendix P** and **Section 4.10** of this EIS
13. Contributions and public benefits The EIS shall address contributions and public benefits in relation to: • developer contributions payable pursuant to the Randwick City Council Development Contributions Plan 2015	Refer to **Section 7.12** of this EIS.

Item/ Description	Document Reference
• any additional contributions proposed or material public benefits associated with the proposal • any proposed Voluntary Planning Agreement or other legally binding instrument agreed between relevant public authorities.	There is no VPA relevant to the site or the proposed development
14. Signage The EIS shall: • provide detail on the location, size and content of any proposed signage • consider any signage as part of the overall built form and urban design of the development.	Building identification signage is proposed only, refer **Section 7.8** of this EIS
15. Soil and contamination The EIS shall identify: • any potential impact of the development on groundwater levels, flow paths and quality • any water licensing requirements or other approvals required under the Water Act 1912 or *Water Management Act 2000* • any geotechnical issues (including contamination and acid sulfate soils) associated with the construction of the development	Refer to **Appendix Q**, **Appendix R**, and Section 7.7 of this EIS
16. Flooding and stormwater The EIS shall: • demonstrate consideration of flood impacts, if necessary, and identify minimum floor levels for buildings and recommend flood management and/or evacuation plan as relevant to the concept proposal. • include a stormwater management strategy which considers the relevant Council stormwater management policy and Water Sensitive Urban Design Principles.	Refer to **Appendix F** and **Section 8.1.6** of this EIS
17. Utilities The EIS shall: • address the existing capacity of the site to service the development proposed and any augmentation requirements for utilities, including arrangements for electrical network requirements, drinking water, waste water and recycled water • identify the existing infrastructure on-site and any possible impacts of the construction and operation of the proposal on this infrastructure. The existing capacity and any augmentation requirements of the development for the provision of utilities, including staging of infrastructure and additional licence/approval requirements in consultation with relevant agencies.	Refer to **Appendix V** and **Section 7.11.2** of this EIS
18. Servicing and waste The EIS shall identify, quantify and classify the likely waste streams to be generated during operation and describe the measures to be implemented to manage, reuse,	Refer to **Appendix U** and **Section 8.1.7** of this EIS

Item/ Description	Document Reference
recycle and safely dispose of this waste. Identify appropriate servicing arrangements for the site.	
19. Consultation During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers and community groups. In particular you must consult with: • Government Architect of NSW • Randwick City Council • Roads and Maritime Services • Office of Environment and Heritage • Sydney Coordination Office within Transport for NSW • ALTRAC – Sydney Light Rail Operator • Local Aboriginal Community and cultural groups • Surrounding residents, businesses and local community groups. The EIS must include a report describing pre-submission consultation undertaken, including a record of the stakeholders consulted, the issues raised during the consultation and how the proposal responds to those issues. Where amendments have not been made to address an issue, a short explanation should be provided.	Refer to **Appendix Z** and **Section 3.1** of this EIS

1. INTRODUCTION

1.1. OVERVIEW

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Pty Ltd on behalf of Blue Sky Private Real Estate (**the Applicant**) in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulations 2000*. This EIS supports the State Significant Development (**SSD**) Development Application (**DA**) SSD_9649 for student accommodation (boarding house) at 4-18 Doncaster Avenue, Kensington (**the site**).

The SSD DA seeks development consent for:

- Demolition of existing structures on site, with the exception of the locally heritage listed semi-detached pair of dwellings at 10 and 12 Doncaster Avenue which are proposed to be retained and repurposed.
- Removal of 42 trees, retention of the significant Sydney Blue Gym (Tree 42) on site, and retention of seven street trees immediately adjacent to the site.
- Construction of a three-storey student accommodation (defined as a boarding house) development comprising:
  - A gross floor area (GFA) of 5,978sqm which equates to a floor space ratio of 1.4:1.
  - A total of 276 beds, including a combination of rooms with private facilities and 'clusters' that rely on communal facilities.
  - Several communal rooms distributed over the three levels of the development with an aggregate area of 374sqm.
  - 498sqm of communal outdoor landscape areas.
- A single level of basement parking including waste and loading areas, 56 car parking spaces, 54 motorcycle spaces and 60 bicycle spaces.

1.2. PROJECT CONTEXT & BACKGROUND

The applicant is the development arm of Atira Student Living, which operates student accommodation facilities in Queensland, South Australia, and Victoria. In-part due to a competitive residential market, the proposed development on the site will be the first Atira Student Living facility in New South Wales.

Atira Student Living aims to develop and operate customised facilities that achieve the objectives of each project whilst helping higher education institutions attract and retain students, enhance the student experience, and provide exciting living and learning environments that support academic success and provide parents with peace of mind. A number of existing Atira Student Living developments are illustrated in the design report at **Appendix C**.

The proposed development will assist in meeting growing demand for affordable student accommodation near tertiary education. As confirmed in the letter provided by UNSW included at **Appendix CC**, there is a paucity of supply for purpose built student accommodation facilities within the local area surrounding UNSW compared to the growing demand.

The site is situated in close proximity to the Carlton Street light rail stop and is a relatively short 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.

A previous development comprising a three-storey residential flat building on the site was granted consent (D80/16) in October 2016. The massing of the proposed development the subject of this SSD DA has considered the building footprint and matters raised in this previously approved DA, in addition to cumulative impacts resulting from surrounding development.

1.3. OBJECTIVES OF THE DEVELOPMENT

The objectives of the proposed student accommodation for the site are to:

- Provide a building envelope that complies with the maximum height control for the site and is generally consistent with the building footprint previously approved on the site;
- Achieve a high quality built form that respects the local character of the area and can provide a positive streetscape contribution;
- Provide student accommodation in close proximity to tertiary education;
- Provide students with high quality living experiences by forming strong and sustainable partnerships with higher education institutions;
- Provide student accommodation in a highly accessible location, with walkable amenities, cycling and public transport infrastructure in close proximity to the site;
- Provide a mix of student room types and sizes that meet a variety of price-points and student needs; and
- Ensure the provision of a safe, secure and supportive living environment.

1.4. REPORT STRUCTURE

The purpose of this report is to provide an assessment of the proposal as described above, within the EIS and the attached supporting documents.

This EIS provides the following:

- A description of the site and surrounding context; including identification of the site, existing development on the site, and surrounding development.
- A detailed description of the proposed development;
- An assessment of the proposed development against the relevant strategic and statutory planning controls;
- An assessment of the key issues and impacts generated by the proposed development; and
- A detailed description of the consultation undertaken with respect to the proposal.

This EIS responds to the Secretary's Environmental Assessment Requirements (**SEARs**) attached at **Appendix A**. This document should be read in conjunction with the supporting documents provided at **Appendix B – CC.**

2. THE SITE

2.1. SITE DESCRIPTION

The subject site is located at 4-18 Doncaster Ave, Kensington and comprises 10 individual 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 the west to Doncaster Avenue of 106.4m and a depth of 40.2m. The site area is 4,276sqm.

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 is within the Randwick Local Government Area, and within the Royal Randwick Racecourse State Significant Development (**SSD**) site. The site is approximately 4.5km south-east of the Sydney CBD.

The site is relatively flat, from its existing ground level of RL 28.64m in the north-western corner of the site close to Doncaster Ave, through to the south-east corner of the site at RL 27.92m. 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.

Ground conditions on the site include:

- Fill of sand and gravel to a depth of 0.5m to 1m;
- Very loose to loose sand to a depth of 3.1m in part of the site and very soft to firm organic clay/peat to a depth of 5.3m in the south western corner of the site;
- Very loose sand over medium dense sand to a depth of 3.7m in the south-eastern corner of the site; and
- Mostly dense to very dense sand to the maximum recorded depths of 20m.

A Sydney Water asset runs east-west across the northern portion of the site. The site is subject to historic covenants dated 1909, including:

- Part of 4-8 Doncaster Avenue is subject to covenants that restrict the number of dwellings that can be erected on that property and provide that the property cannot be used for a hotel.
- Part of 4-8 Doncaster Avenue is subject to a covenant that requires any main building on the land to be made of brick or stone or both

In accordance with s81J of the *Real Property Act 1900*, a restrictive covenant may be extinguished where the land benefiting from the covenant cannot be identified and the covenant was created before 1 July 1920, and the covenant has no practical value or application. In accordance with s81A of the *Real Property Act 1900*, a restrictive covenant involving building materials that has been in effect for 12 years or more may be extinguished by the registered proprietor of the servient tenement.

In addition to consideration of clause 1.9A of *Randwick Local Environmental Plan 2012*, these covenants do not represent a restriction to development of the scale and nature proposed on the site as part of this SSD DA.

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

Figure 1 – Site Location

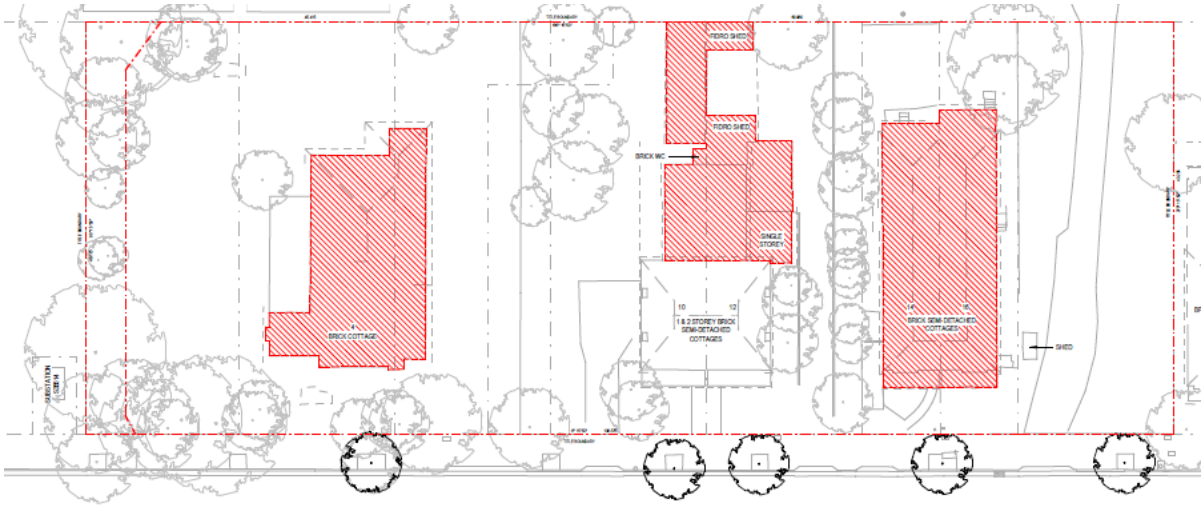
2.2. EXISTING DEVELOPMENT

The site contains low scale residential development fronting Doncaster Avenue, consisting of four single and double storey brick semi-detached cottages and one detached brick cottage. The two semi-detached terraces at 10-12 Doncaster Avenue are locally heritage listed. The heritage listed semi-detached terraces were constructed circa 1896.

The lot at 18 Doncaster Avenue is presently vacant and has historically been used as informal access to the Randwick Racecourse precinct. The site is currently accessed via pedestrians and vehicles from Doncaster Avenue. The site features four existing driveway crossovers on the eastern side of Doncaster Avenue.

The site includes predominantly semi mature exotic tree species planed on the northern site boundary and adjacent to 14 Doncaster Avenue and minor vegetation. The site features a significant Sydney Blue Gum (Tree 42) on the north-western corner of the site. The existing buildings on the site are illustrated in **Figure 2**.

Figure 2 – Existing buildings on the site



2.3. SITE CONTEXT & SURROUNDING DEVELOPMENT

A locality image is provided at **Figure 3** demonstrating the location of the site in relation to Randwick Racecourse, Centennial Park, and the Sydney CBD.

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 including a planned path on Doncaster Avenue.

Figure 3 – Locality diagram

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, opposite 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 architectural package provided at **Appendix C** 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 C** and illustrates proximity to University facilities, the Kensington Town Centre and existing and developing public transport routes.

2.4. SERVICES

The site currently contains and is connected to all necessary services including electricity, gas, water, communications, drainage and sewage.

2.5. ACCESSIBILITY

2.5.1. Road Network

The site is directly serviced by the following roads:

- Alison Road – an RMS main road that generally traverses in an east-west direction between Arden Street in the east and Anzac Parade in the west. Due to construction of the Sydney Light Rail, it is generally subject to a 50km/hr speed zoning and accommodates two lanes of traffic in each direction within the vicinity of the site. Alison Road permits sections of time restricted kerbside parking.
- Anzac Parade – an RMS main road that traverses in a north-south direction between Moore Park Road in the north and Little Bay Road in the south. Due to construction of the Sydney Light Rail, it is generally subject to a 50km/hr speed zoning and has one lane of traffic in each direction within the vicinity of the site. Kerbside parking is not permitted on Anzac Parade.
- Doncaster Avenue – a local road that runs in a north-south direction between Alison Road in the north and Gardeners Road in the south. It is subject to 50km/hr speed zoning however, a '40km/hr School Zone' speed restriction does apply at school drop-off and pick-up times. Doncaster Avenue has a single lane of traffic in each direction and permits kerbside parking with various restrictions.

2.5.2. Walking

Footpaths are provided along both sides of Doncaster Avenue, Abbotsford Street, Carlton Street and other roads in the vicinity. Footpaths are also provided on both sides of Alison Road, though currently, while CSELR is being built, sections of the footpath are temporarily closed.

The site is located within walking distance of several amenities such as restaurants, cafés, bars, supermarkets, shopping centres, parks and schools. WalkScore has been used to measure the 'walkability' of the subject site in relation to these nearby amenities based on distance and pedestrian friendly areas. The WalkScore for the site has been found to be 73, with the site being very walkable to most amenities and with excellent access to public transport.

2.5.3. Cycleways

The site is located within close proximity to several dedicated bicycle lanes, off-road shared paths and bicycle friendly roads available throughout the area. These cycleways link to other bicycle routes to provide connections to various areas. The primary cycleways in the vicinity include:

- Designated bicycle lanes on Doncaster Avenue which provide access to areas such as Randwick Racecourse and UNSW.
- High-traffic direct routes on Doncaster Avenue, Todman Avenue, Day Aveune and Lenthall Street, as well as sections of designated bicycle lanes. Bi-directional lanes are also to be installed in sections of Doncaster Avenue (eastern side, in front of site), Houston Road, General Bridges Crescent and Sturt Street.
- Low-traffic on-road routes on Boronia Street, Doncaster Avenue, High Street and areas of Centennial Park. These routes provide access to areas such as Kingsford, Randwick and La Perouse.
- Off-road shared paths on Alison Road, South Dowling Street and Cleveland Street providing access to areas towards Moore Park and the Sydney CBD.
- Regional cycle routes on Alison Road, High Street, Bourke Street, South Dowling Street and Cleveland Street.

2.5.4. Public Transport

The site is well serviced by various forms of public transport as outlined below.

Buses:

The site has access to excellent bus services with eight bus stops provided within optimal walking distance (400m) of the site for the following State Transit bus services:

Table 2 – Bus routes

Bus routes	Bus routes
338 – Clovelly to Central Railway Square	396 – Maroubra Beach to City Circular Quay
339 – Clovelly to City Gresham Street	397 – South Maroubra to City Circular Quay
372 – Coogee to Central Railway Square	399 – La Perouse to City Circular Quay via Malabar Beach and Maroubra Junction
373 – Coogee to City Circular Quay via Belmore Road	L94 – La Perouse to City Circular Quay
374 – Coogee to City Circular Quay via Bream Street	M10 – Maroubra Junction to Leichhardt via City
376 – Maroubra Beach to Central Railway Square	M50 – Coogee to Drummoyne
377 – Maroubra Beach to City Circular Quay	X92 – Little Bay to City Museum
391 – La Perouse or Port Botany to Central Railway Square	X94 – La Perouse to City Museum
392 – Little Bay to City Circular Quay via Eastgardens and Prince Henry Hospital	X96 – Maroubra Beach to City Museum
393 – Little Bay to Central Railway Square via Maroubra and Kingsford	X97 – South Maroubra to City Museum
394 – City Circular Quay to La Perouse via Maroubra and Kingsford	X99 – Little Bay to City Museum
395 – Maroubra Beach to Central Railway Square	

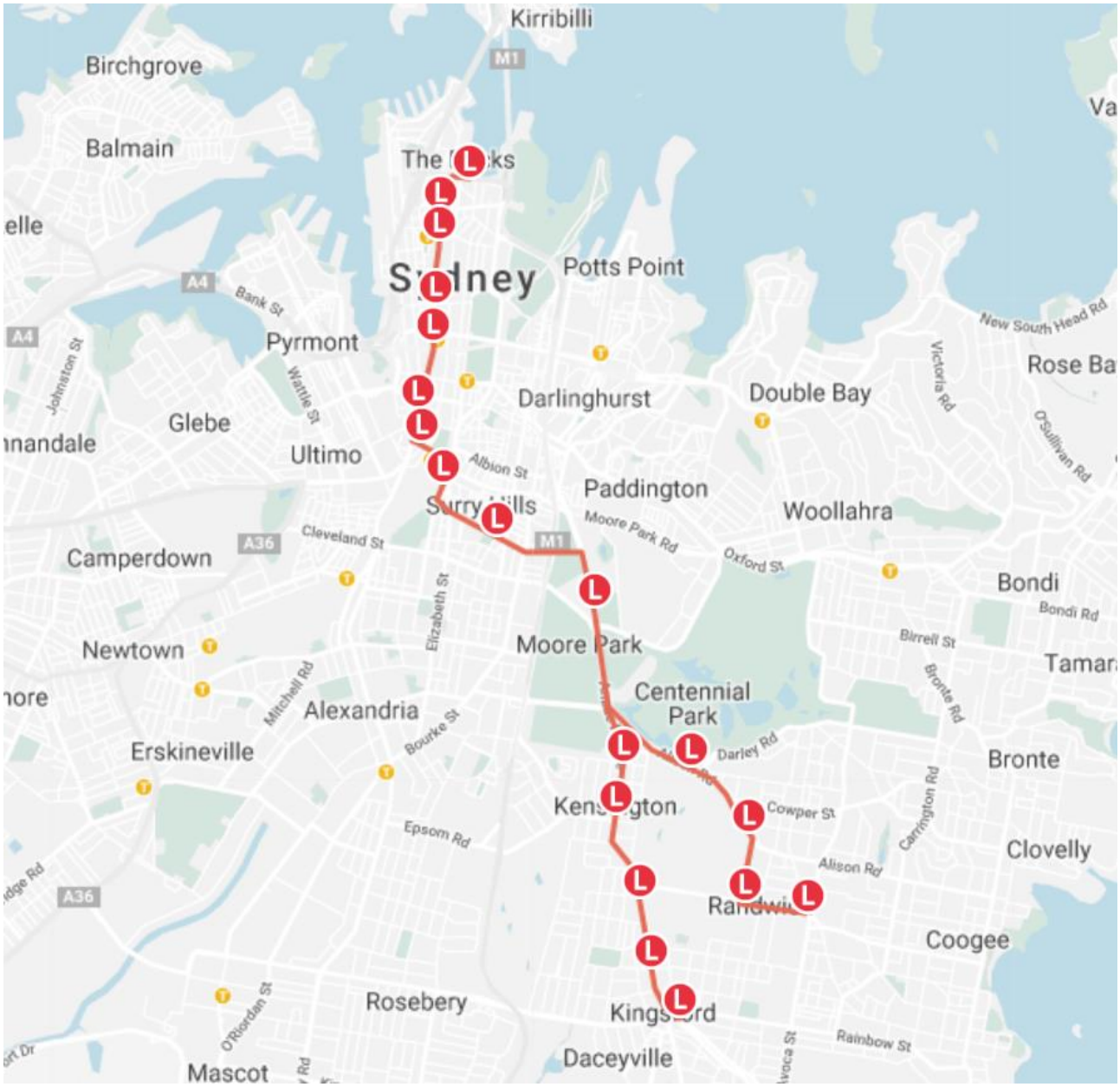
Light Rail Services:

The site is located within close proximity to two future light rail stations for the CBD and South East Light Rail (**CSELR**), with the closest station being the Alison Road-Royal Randwick Station (approximately 180m east of the site) and Carlton Street-ES Marks (approximately 250m west of the site). Once completed, the CSELR network will feature a total of 19 stations. Refer to **Figure 4**.

Trains:

The site has access to buses and in the future, light rail services, that will provide regular routes to various railway stations, primarily Central Railway Station. Central station provides frequent services on many routes, within the Greater Sydney metropolitan area, to the Central Coast and Newcastle, to the Southern Highlands and South Coast, and beyond.

Figure 4 – CBD and South East Light Rail Map (Source: TfNSW)



Source: NSW Government

3. CONSULTATION

To inform the request for SEARS and the preparation of this EIS, the applicant and its consultant team have undertaken pre-lodgement consultation with key stakeholders including:

- Surrounding residents and businesses
- Local Aboriginal Community and cultural groups
- Randwick City Council
- Government Architect NSW (GANSW)
- Transport for NSW (TNSW)
- Roads and Maritime Services (RMS)
- ALTRAC – Sydney Light Rail Operator

Community consultation undertaken has been documented within the Pre-Lodgement Consultation Outcomes Report at **Appendix Z** and are further outlined in the following sections.

3.1. COMMUNITY CONSULTATION

Consultation has been conducted with the local community and neighbouring residents and landowners. Various strategies were employed to maximise community involvement in the project. Community consultation included;

- door-knocking of adjacent dwellings,
- letterbox drop of nearby dwellings,
- invitation for face-to-face stakeholder briefings,
- establishment of an information hot-line; and
- the creation of a project specific email address to field enquiries and comments.

At the time of writing this report there was no feedback collected through the engagement email or phone line. Randwick Council elected officials had declined the request for a face-to-face briefing. The elected members of Randwick Council were provided a fact sheet and an offer for a briefing in early 2019. At the time of writing, the State Member for Heffron had also declined a briefing and was provided with a fact sheet, along with an offer for a briefing in early 2019.

The key insights and comments received from the door-knocking of properties related construction impacts, queries relating potential overshadowing impacts, highlighting the importance of privacy, noise, and rubbish management. The community consultation also raised concerns regarding the number of car parking spaces provided in the proposal, noting that on-street parking spaces are likely to be reduced as a result of the installation of a bicycle lane on Doncaster Avenue.

The matters raised by the community have been summarised at the Consultation Outcomes Report at **Appendix AA.** A response to the summarised matters raised is provided in **Table 2** below.

Table 3 – Response to matters raised within community consultation

Matter Raised	Response
Construction Impacts	
Construction dust	A Construction Plan of Management that includes dust mitigation is provided at **Appendix Q.** This plan will be developed as necessary in response to conditions of consent relating to the management of the construction of the project.

Matter Raised	Response
Correlation regarding construction of the bicycle lane and the proposal	The construction traffic management plan provided at **Appendix L** identifies the likely vehicular routes to access the site to avoid using local roads and specifically Doncaster Avenue south of the site. By doing so, the applicant proposes to minimise cumulative impact of the construction of the Council bicycle lane. During construction it's anticipated that conditions of consent will require coordination and communication between the Council and any local civic works concurrently occurring on Doncaster Avenue.
Potential damage to properties	Dilapidation reports on adjacent properties in accordance with standard conditions of consent will be required.
Post-Construction Impacts	
Overshadowing	Overshadowing impacts are addressed in detail at **Section 8.1.2** of this EIS and the impacts at mid-winter (greatest impact) are illustrated in the diagrams included at **Appendix C**.
Feedback about the importance of privacy, noise, and rubbish management were raised by neighbours.	• Privacy to nearby properties is addressed at **Section 8.1.2** of this EIS. • Noise management is addressed in **Section 8.1.4** of this EIS, the Acoustic and Vibration Assessment provided at **Appendix O**, and the Operational Management Plan provided at **Appendix BB**. • Waste management is addressed in **Section 8.1.7** of this EIS and the Waste Management Plan provided at **Appendix U**.
Car parking	The provision of car parking is addressed in detail at **Section 8.1.4** of this EIS and the Traffic and Parking Assessment provided at **Appendix L**.

An Aboriginal Heritage Impact Permit (**AHIP**) was granted for the site on 22 June 2018 following the preparation of an Aboriginal Cultural Heritage Assessment Report which adhered to the Office of Environment and Heritage 2010 'Aboriginal community consultation guidelines for proponents'. Further to the consultation that occurred prior to the issuance of the AHIP, recent consultation with respect to interpretation of Aboriginal heritage across the development sit was undertaken with the La Perouse Local Aboriginal Land Council. The themes and ideas from this consultation are included at **Appendix K**.

3.2. GOVERNMENT AGENCIES

The applicant and its consultants have consulted with the relevant Government agencies as outlined in **Table 4** below.

Table 4 – Summary of feedback from government agencies

Government Agency	Matters Raised	Response
Office of the Government Architect 4 October 2018 & 6 December 2018 Written in the absence of formal minutes from 6 December 2018	Key things to consider for the SSD DA architectural package and Design Guidelines were: • The site planning strategy is generally supported, and the building layouts and locations respond well to the scale of the surrounding streetscape. • Breaking up of form to create open space around the heritage cottage is supported but the close proximity of the new buildings to the heritage building needs to	• Site planning has been retained • Setbacks surrounding the heritage item are generally consistent with the approved setbacks supported by the previous DA. The Landscaping Plan includes

	be sensitively handled through hard and soft landscaping • We commend the relocating of the car park entrance away from the heritage cottage and the inclusion of communal/social spaces to activate the building edges facing the cottage. • The repurposing of the cottage to accommodate individual accommodation studios, however, raises concern around lack of activation at the centre of the plan. We recommend the common spaces in the households within the cottage be relocated to ground level to address this. • The deep soil zone along the tram depot boundary is commended. We reiterate earlier advice that, in general, careful attention should be paid to the spaces between buildings to promote shade and privacy and create intimate and useable outdoor spaces • Communal rooms and associated open spaces within the site will require a management strategy to ensure no unreasonable impacts to nearby resident amenity resulting from the proposal. • A significant percentage of the front boundary appears to be fenced with an 1800mm high palisade type fence or solid brick walls. This approach to site security and safety is discouraged. Use of level changes, soft landscape, screening plants and the isolated use of fencing near habitable rooms is preferred and recommended by GA NSW. The street frontage should remain unfenced and open as for as possible with landscape and building edges used to define public, semi-public, private and secure zones. • The use of vertically proportioned windows within a mainly brick fabric appears to be successfully referencing the varied contextual precedents influencing the site. The building's longest continuous facades are effectively broken up through material and formal devices. This approach is highly commended. • We restate our earlier comment supporting the design: The built form appears sympathetic in bulk and scale and successfully references the range of historical periods and typologies represented within Doncaster Avenue. The Government Architect's office (GA) advised that the State Design Review Panel and GA's will undertake a	both hard and soft landscaping around the item. • The location of the car park entrance and communal open spaces as been retained. • Communal spaces were considered for the cottage, however the repurposing of the cottage for dwellings is proposed as it requires limited internal changes to the building fabric, supported by the heritage consultant. • Landscaping has been designed by a reputable landscape architect to facilitate high quality communal spaces that are usable and respect neighbouring buildings. • Operational Management is addressed at **Appendix BB**. • Fencing is required by the operator to maintain safety and surveillance for occupants. Furthermore, the design of the fence has been supported by the heritage consultant to reflect the historic streetscape. Landscaping also facilitates stormwater runoff flows. • The strategy for vertically proportioning the building has been retained in the proposed Architectural Plans included at **Appendix C**. • The general arrangement of the site and built form has been retained in the proposed Architectural Plans included at **Appendix C**.

	desktop review of the EIS during exhibition with an education expert / external panellist and provide written advice to the assessment team, which will be received as part of the assessment process. It may be that as part of the response to submissions the GA would require a further presentation, but they will provide that advice in their review of the EIS.	
Department of Planning and Environment Meeting on 17 September 2018	The applicant met with Randwick Council's strategic planning team on 17 September 2018 Feedback from the Department of Planning and Environment included: • Confirmation that the proposal will be classified as SSD DA. • Need to balance anticipated car parking demand with the relevant controls. • The EIS will need to include a clause 4.6 variation for any increase in FSR above 0.9:1, notwithstanding the provisions of the ARH SEPP.	The Department comments have been noted and have informed the submitted plans and technical studies.
Randwick City Council 3 August 2018	The applicant met with Randwick Council's strategic planning team on 3 August 2018 and subsequently engaged with Randwick Council's internal waste and traffic departments. Feedback from Randwick Council included: • Understood that the ARH SEPP applied to the proposal. • Encouraged consideration of the impact the development would have on the conservation area. • Raised that the community had an expectation that boarding houses should include compliant car parking rates. • That waste per room should be counted as 'waste per dwelling' as studio rooms include kitchen facilities.	The ARH SEPP is addressed at **Section 7.4** of this EIS. Heritage conservation is addressed at **Section 8.1.3** and within the Heritage Impact Assessment at **Appendix H**.
Transport for NSW and the Roads and Maritime Services	The applicant has written to Transport for NSW and RMS seeking feedback on the proposed design but has not received any comments.	The Traffic and Parking Assessment at **Appendix L** provides an assessment on impacts to the local road network resulting from the development.
ALTRAC – Sydney Light Rail Operator	The applicant has written to ALTRAC seeking feedback on the proposed design but has not received any comments.	The Construction Traffic and Parking Assessment at **Appendix L** provides an assessment on impacts to the local road network during construction of the development.

Office and Environment and Heritage	A letter describing the proposal was issued to the Office of Environment and Heritage on 14 December. It is our understanding that as none of the cultural built elements pertaining to the subject site fall under the jurisdiction of the Heritage Division, Office of Environment and Heritage, there is no requirement to seek further specific consultation in relation to the SSD DA.	Potential impacts of the proposed development on cultural built heritage, archaeology, and Aboriginal archaeology are addressed at **Section 8.1.3** of this EIS and at **Appendix H**-**Appendix K**.

4. PROPOSED DEVELOPMENT

4.1. OVERVIEW

This section provides a detailed description of the proposed development. Architectural Drawings prepared by Hayball Architects are provided at **Appendix C**. The SSD DA seeks development consent for:

- Demolition of existing structures on site, with the exception of the locally heritage listed semi-detached pair of dwellings at 10 and 12 Doncaster Avenue which are proposed to be retained and repurposed.
- Removal of 42 trees, retention of the significant Sydney Blue Gym (Tree 42) on site, and retention of seven street trees immediately adjacent to the site.
- Construction of a three-storey student accommodation (defined as a boarding house) development comprising:
  - A gross floor area (GFA) of 5,978sqm which equates to a floor space ratio of 1.4:1.
  - A total of 276 beds, including a combination of rooms with private facilities and 'clusters' that rely on communal facilities.
  - Several communal rooms distributed over the three levels of the development with an aggregate area of 374sqm.
  - 498sqm of communal outdoor landscape areas.
- A single level of basement parking including waste and loading areas, 56 car parking spaces, 54 motorcycle spaces and 60 bicycle spaces.

The proposal will generate 78 FTE direct construction and eight FTE direct operational jobs. The key numerical overview of the development is described below.

Table 5 – Numeric overview of the proposed development

Item	**Proposal**
Site area	4,276sqm
Gross floor area	5,978sqm
Floor space ratio	1.4:1
Maximum building height	12m
Number of beds	276
Student capacity	Anticipated to be 276. Couples may make special application to board within studio apartments together.
Minimum Setbacks	4.15m to southern boundary (ground level) 5.33m to southern boundary (levels 1 and 2) 4.19m to eastern boundary 4.03m to northern boundary 4m-5.02m to Doncaster Avenue
Room type	
Studios	127
Twin Studios	11
3-6 Bed Clusters	27

Item	Proposal
Parking	
Car parking	56 (including 5 car share spaces)
Motorcycle parking	54
Bicycle parking	60
Communal space (in addition to shared facilities in cluster rooms)	
Communal open space (external)	498sqm
Deep soil	22% of site
Communal internal space	374sqm

4.2. DESIGN PRINCIPLES

As generally described within the Design Report prepared by Hayball Architects included at **Appendix C**, the following design principles have guided the design development of the proposed development:

- Conservation and adaptive reuse of the heritage listed terraces on the site for the purposes of student accommodation, with minimal impact to significant heritage fabric of the items.
- Provide building massing addressing the street consistent with the scale of attached terraces and the historic subdivision of the locality.
- Stepping down of dominant facade to the heritage listed terraces and adjacent dwellings to the south.
- Ensure a curtilage is provided around the heritage listed terraces to ensure they remain a significant element in the streetscape.
- Provide primary and secondary vertical articulation and vertical proportions as a way to interpret the historic character of dwellings in the locality.
- Positioning the driveway to minimise impacts to the heritage listed terraces and dwellings to the south.
- Retain the significant mature blue gum tree at the north-western corner of the site.
- Position communal living and open spaces away from neighbouring dwellings.
- Generally retain a similar footprint to the residential flat building development previously approved on the site.
- Minimise the number of south facing rooms and maximise natural light to rooms and open space.

Artists impressions of the proposed detailed design of the new development are illustrated at **Figure 5**.

Figure 5 – Images of key components of the built form

Picture 1 – Proposed development and retained heritage listed terraces, looking north east

Source: Hayball Architects

Picture 2 – Proposed development and retained heritage listed terraces, looking south east

Source: Hayball Architects

Picture 3 – Proposed development adjacent to 20 Doncaster Avenue, looking north east

Source: Hayball Architects

4.3. DEMOLITION & EXCAVATION

Demolition of existing structures on the site is proposed within the SSD DA with the exception of significant heritage fabric of the locally heritage listed semi-detached pair of dwellings at 10 and 12 Doncaster Avenue. Specific demolition proposed include:

- Demolition of the existing dwellings located at 4-8 Doncaster Avenue and 14-16 Doncaster Avenue; and
- Demolition of the rear wings and outbuildings of 10-12 Doncaster Avenue.

The demolition of the rear wings and outbuildings of the heritage listed semi-detached terraces at 10-12 Doncaster Avenue are supported within the Heritage Impact Statement at **Appendix H. E**

Excavation to a maximum depth of RL24.3m (approximately 4.2m) is proposed to construct a single level basement.

4.4. LAND USE & OPERATION

The proposal is for a purpose-built student accommodation development to be operated by Atira Student Living. The operational details of the development are outlined within the Operational Management Plan at **Appendix BB**. Key components of the operation of the facility include:

- Maximum student capacity of 276 students, equating to a maximum one student per bed;
- On-site management including:
  - Operations Manager who is responsible for day to day performance and management of the facility;
  - Maintenance Technician who is responsible for day to day residence maintenance;
  - Evening Duty Manager who is responsible for after-hours activities and assist with maintaining a respectful and safe community;
  - Customer Support Assistant and Customer Contact Centre for administration and contracting; and
  - Student Experience Assistants who's on-shift duties include responding to emergencies and incidents, resident disputes, and behavioural issues and complaints.

- CCTV security camera network across the facility which covers all entry and exit points, all communal spaces and circulation spaces throughout the building. Footage is streamed to the front desk and office allowing staff.

As outlined at **Section 1.2** of this EIS Atira Student Living are experienced in managing purpose built student accommodation in various jurisdictions across Australia. The proposed facilities within the development for student use include:

- Communal kitchens and cooking facilities;
- Shared toilet and bathroom amenities;
- Communal flexi-spaces, meeting spaces, and study areas;
- Communal lounges, games areas, gymnasium; and
- Shared communal laundry.

Offering a diversity of programs and communal spaces dispersed throughout the development will cater for the different ways people live and ensure that spaces are well utilised. This will also encourage a sense of ownership for these spaces.

4.5. SITE ACCESS

General site access will be from Doncaster Avenue only. Two primary pedestrian access points are provided to the site from Doncaster Avenue. The northern access point is provided as secondary access and presents a discrete access point for residents only. Access will be managed through exclusive swipe access. The southern access point is co-located with the primary administration and main entrance of the development. The main pedestrian access point is adjacent to the administrative and communal spaces to provide a singular entry for guests, and surveillance of guests and students entering the facility.

Direct street access is provided to the two cluster rooms provided within the adaptively reused heritage listed terraces, consistent with the original layout of the buildings.

A single vehicular access point is provided on the site (reduced from four existing driveways) for cars and service vehicles. This driveway is sleeved by built form and positioned away from the heritage listed terraces and neighbouring residential dwellings.

4.6. MATERIALS AND FINISHES

A schedule of materials has been prepared by Hayball Architects included at **Appendix C**. The proposed materials have been selected to respond to the character of the locality, the Randwick Racecourse Heritage Conservation Area, and contemporary standards for student accommodation and include:

- Austral bricks in ‘Castellana’ and ‘Miro’ shades;
- Powder coated folded aluminium in a matt finish window frames;
- Clear vision and grey body tint glass;
- Flat metal cladding and metal panel system with matt finish; and
- Vertical fin fence with matt finish.

4.7. LANDSCAPE

4.7.1. Proposed Landscaping

A concept landscape masterplan for the site has been developed by 360 Landscape Architects and is included at **Appendix E**. As part of this masterplan, Aboriginal heritage across the site has been featured within an Interpretation Strategy prepared by GML Heritage and is included at **Appendix K**. Key features of the landscape masterplan are as follows:

- Communal courtyard featuring planters with trellis and climbers, moveable furniture, deck and paving.

- Communal courtyard adjacent to locally listed heritage terraces with deck and bench seating, feature trees and palms, and screen planting to adjacent studio rooms.
- Approximately 940sqm deep soil area (approximately 22% of site area).
- 'Secret garden' surrounding the area of protection for Aboriginal relics at the eastern site boundary, providing passive seating, native plants, and bush tucker plants.
- Locked gate at the northern site boundary to prevent unauthorised access to the site.
- Front setback planting to mitigate change in levels and provide a landscaped front setback consistent with the character of the locality.
- Screen planting on the eastern and southern boundaries.
- A bioswale on the northern boundary to mitigate stormwater runoff and localised flooding (refer **Appendix F**).

The proposed Concept Landscape Masterplan is illustrated in **Figure 6** below.

Figure 6 – Proposed landscape strategy

Source: 360 Landscape Architects

4.7.2. Tree Removal

A total 42 trees are proposed to be removed as part of the SSD DA. 22 of these trees are proposed to be removed as a result of the proposed construction works, and another 20 trees are proposed to be removed based on poor species characteristics, health or structure, and are not directly related to the proposed works.

An Arboricultural Report has been prepared to support the SSD DA, included at **Appendix M** to address the impact of the removal of 42 trees. As noted above, approximately 29 new trees are proposed to be planted on the site in accordance with the landscape plans provided at **Appendix E**.

4.8. WASTE

4.8.1. Construction Waste

The contractor will comply with DPE's Conditions of Consent and the Construction and Demolition Waste Management Plan at **Appendix Q** to ensure all waste is carefully removed, packaged and transported from the site to an appropriate waste facility. This will minimise potential contact with the waste and reduce environmental risk from an accidental release. Where appropriate, waste will be reused or recycled.

4.8.2. Ongoing Waste

An Operational Waste Management Plan has been prepared by Elephants Foot and is attached at **Appendix U**. Based on the information provided and benchmark data from similar developments, waste is proposed to be managed as follows:

- The proposed development is defined as a boarding house, and pursuant to Randwick City Council Waste Management Guidelines for Proposed Development, waste generation is anticipated to be:
  - Waste: 9L per occupant per day
  - Recycling: 3L per occupant per day
- Waste and recycling is to be collected and stored in a communal waste room within the basement of the proposed development. Responsibility for the collection of waste is shared between students and building management pending the source of the waste.
- Waste is proposed to be collected by a private contractor via the driveway and will enter and egress the site in a forward direction, approximately twice weekly pending the time of year and demand.
- Waste collection shall occur via 6.4metre medium rigid vehicle (MRV), as provided by waste companies who service this area.
- It is not proposed that waste bins be presented to the kerb for collection to maintain the high quality of the proposed streetscape.

4.9. SITE SERVICES

An Infrastructure Management Plan has been prepared by various technical consultants and is attached at **Appendix V**. The Infrastructure Management Plan concludes that there appears to be sufficient capacity in the surrounding water, gas, sewer, and electrical infrastructure to support the development with the addition of a kiosk transformer.

A stormwater pipe is located across the site which is proposed to be deviated to the northern boundary of the site as per the Civil Plans provided at **Appendix F**. A 4m wide drainage easement and bio swale planting are proposed across the deviated stormwater pipe.

4.10. ECOLOGICALLY SUSTAINABLE DEVELOPMENT

An Ecologically Sustainable Development (**ESD**) report has been prepared by Lucis Consulting Australia and is attached at **Appendix P**. The proposal has considered the following ESD initiatives (amongst others):

- High performance building fabric and glazing.
- Access card switches to ensure lighting and air conditions within an accommodation unit is off when occupant exits.
- High energy efficiency air conditioning systems, vertical transport systems, and luminaires.
- Solar photovoltaic (PV) energy generation system will be considered as a roof-mounted installation, directly offsetting the daytime electrical load of the building.
- All bathroom fixtures (toilet pans, urinals, hand basin taps and showers) will meet minimum WELS ratings as described in the ESD Report.
- Rainwater tank located within the basement level with pump to levels above. Rainwater harvesting will be considered for this development for reuse in toilet flushing, clothes washing machines, wash down bays, and irrigation. This initiative will reduce potable water consumption.
- Provision of significant bicycle parking and provision of all tools necessary to perform basic bike repairs and maintenance i.e. changing flat tyres, pumping tyres, making minor adjustments.
- Provision of communal gymnasium equipment for physical and mental health of occupants.
- Building Management System for the complete operation of all mechanical plant, including scheduling of equipment and automatic shutdown of equipment after hours.

4.11. CONSTRUCTION PHASING & MANAGEMENT

4.11.1. Work Hours

The proposed works will be undertaken in accordance with the recommendations of the Acoustic Report at **Appendix N**, NSW EPA Interim Construction Noise Guideline:

- Monday to Friday 7.00am to 6.00pm.
- Saturdays 8.00am to 1.00pm.
- No work on Sundays or public holidays
- Out of hours works may be required from time to time and a separate application will be made by the Contractor to seek approval

4.11.2. Sediment, Erosion and Dust Controls

In accordance with the Sediment and Erosion Control Plan attached at **Appendix F**, sediment, erosion and dust control measures will be provided during construction in accordance with the requirements of *'Blue Book (Managing Urban Stormwater – Soils and Construction)'* and *'Guidelines for developments adjoining land managed by the Office of Environment and Heritage'*.

The following structures are proposed to be installed at the site to mitigate dust, erosion and sediment runoff:

- Shakedown area at site access from Doncaster Avenue;
- Installation of temporary silt fences;
- Installation of various silt traps throughout the site; and
- Water pump-out from sediment trap to be discharged to Doncaster Avenue.

5. ANALYSIS OF ALTERNATIVES

As evidenced by ABS Statistics, tertiary education makes a large contribution to the NSW and Australian economy. Australian universities are internationally well ranked and are increasingly attractive to international and domestic students. In 2018 the Australian Government released the 'National Strategy for International Education 2025', which states that international education is one of the five main growth sectors contributing to the transition of Australia's economy from resources-based to a modern service economy.

In evolving this sector for the benefit of domestic and international students, the Australian economy and the world more broadly, we need to support students. As stated in the National Strategy we need to look to ways to "deliver and improve support services, affordable and convenient accommodation and public transport".

5.1. ANALYSIS OF FEASIBLE ALTERNATIVES

The proposed design responds strongly to the site constraints and opportunities and is considered the best response to both site and surrounding context. Alternatives to the proposed concept plan include the 'do nothing' scenario which would not achieve the project objectives.

The consequences of the do-nothing scenario include a failure to provide suitable student accommodation for a growing demand base, and see the proposed development on the site abandoned. As demonstrated through a previously approved development on the site (DA80/16), the alternative to the proposal is likely that another private developer would construct a three-storey residential flat building on the site. This outcome, whilst may result in a compliant building form that is permissible development with consent, would not contribute significantly to the delivery of diverse residential accommodation in the locality and provision of affordable housing options for students. There are ample other locations throughout the LGA to provide for non-student housing.

Given the proximity of the site to UNSW, and other tertiary education such as TAFE NSW at Randwick, it is possible that private rental accommodation delivered on the site and surrounds could be utilised by students attending these institutions. As stated at **Appendix BB**, there is a current lack of purpose built student accommodation in the locality, which drives students to either travel from other locations or rent in private accommodation.

Such a 'do-nothing' scenario with students otherwise renting in the private market, with maintained levels of student enrolment and demand for accommodation, would not be an efficient use of land. Such a scenario would be without the proposed management, staff, guidance, and facilities (including communal open space separated from surrounding neighbours) included in the proposed development which could result in potential amenity impacts for surrounding neighbours. Further, a do-nothing scenario may increase the demand for private rentals in the immediate locality, undermining government objectives for improving housing affordability.

As such the proposed development contribute to fulfilling a need for student accommodation in convenient and accessible locations near tertiary educational establishments, has a clear strategic need, and is considered a more desirable scenario than the alternatives.

6. STRATEGIC PLANNING CONTEXT

In accordance with SEARs, the following strategic planning policies have been considered in the assessment of the proposal:

- NSW State Priorities;
- Premier's Priorities;
- A Metropolis of Three Cities – Greater Sydney Region Plan;
- Eastern City District Plan;
- Future Transport 2056
- Better Placed: An integrated design policy for built environment NSW
- Guide to Traffic Generating Developments (RMS)
- NSW Planning Guidelines for Walking and Cycling
- NSW Bicycle Guidelines
- Cycling Aspects of Austroads Guides
- Sydney's Cycling Future 2013;
- Sydney's Walking Future 2013;
- Randwick City Council Section 94A Development Contributions Plan

Consistency with the relevant goals contained in the above strategic policies is discussed below.

6.1. NSW STATE PRIORITIES

NSW State Priorities is the State Government's plan to guide policy and decision making across the State. The proposed redevelopment of the site is consistent with key objectives contained within the plan, including:

- **Increasing housing supply across NSW:** *Deliver more than 50,000 approvals every year*
  The proposal will increase the housing supply in NSW by providing 276 beds and associated facilities for students in a prime location close to UNSW and other facilities.

Overall, it is considered that the proposal is consistent with the goals and objectives set out within the *NSW State Priorities*.

6.2. PREMIER'S PRIORITIES

The Premier's Priorities are 12 priorities reflecting the NSW government's whole-of-government approach to addressing important issues for NSW. Those of relevance to the proposed development are the following:

- **Creating Jobs:** *Create 150,000 new jobs by 2019*
  The proposal will create temporary job opportunities in manufacturing, construction, and construction management during the project's construction phase of works.
- **Making Housing More Affordable:** *61,000 housing completions on average per year to 2021*
  The proposal will provide affordable housing for students with 276 beds being provided in a high quality, purpose-built student accommodation development.

Overall, it is considered that the proposal is consistent with the relevant priorities set out above.

6.3. A METROPOLIS OF THREE CITIES – GREATER SYDNEY REGION PLAN

A Metropolis of Three Cities, developed by the Greater Sydney Commission, is a bold vision for three, integrated and connected cities that will rebalance Greater Sydney – placing housing, jobs, infrastructure and services within easier reach of more residents, no matter where they live. Western Parkland, Central River, Eastern Harbour (building on its recognised economic strength and addressing liveability and sustainability) sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters.

It is anchored on the strategies of infrastructure and collaboration, liveability, productivity, sustainability and implementation. As mentioned in other parts of the EIS, temporary jobs will be provided in manufacturing and construction. Sustainability is likewise a key consideration, particularly in the proposed design, construction, and operation of the buildings.

A key objective of the Region Plan is creating 30-minute cities within Greater Sydney, by increasing access through different modes of transport and providing a rich mix of uses and amenities across the metropolitan area. The proposal is highly consistent with this key objective by providing affordable student housing in a location that has excellent access to public transport and walking and cycling routes and is in close proximity to UNSW, the Kensington Town Centre, Centennial Park and other facilities. By doing so, it will enhance the mix of people and activities within Kensington and contribute to making it a more vibrant area.

6.4. EASTERN CITY DISTRICT PLAN

The Eastern City District is at the centre of the Eastern Harbour City, recognised as Australia's global gateway and financial capital. The district is highly accessible to the Harbour CBD, which has half a million jobs and the largest office market in the region. The Eastern City District covers the Bayside, Burwood, City of Canada Bay, City of Sydney, Inner West, Randwick, Strathfield, Waverley and Woollahra local government areas.

This District Plan responds to major transport, health and education investments in the District, either committed or planned, such as Sydney Metro and the CBD and South East Light Rail (CSELR), which aligns with Future Transport 2056.

Planning priorities that directly relate to the proposed development include:

- *Planning for a city supported by infrastructure*

The site benefits from good access to public transport, specifically through bus links and the future CSELR. The District Plan encourages active transport modes such as walking and cycling. The future residents of the site will benefit from well-connected walkways and bicycle lanes adjacent to the site.

- *Providing services and social infrastructure to meet people's changing needs*

The provision of student accommodation is meeting the need for affordable accommodation for students within a reasonable distance of UNSW.

- *Fostering healthy, creative, culturally rich and socially connected communities*

The proposal is well-located with respect to walking and cycling lanes, which provides for the health of residents through use of these active transport modes. The development provides significant areas of communal space for the social benefit of residents. The site is in close proximity to UNSW, the Kensington Town Centre, Centennial Park and other areas for the convenience and enjoyment of the students living on the site.

- *Providing housing supply, choice and affordability, with access to jobs, services and public transport*

The proposal enhances the supply of affordable housing for students, with good access to services and public transport.

- *Creating and renewing great places and local centres, and respecting the District's heritage*

The redevelopment of the site enables its renewal and revitalisation whilst sensitively incorporating the heritage item on the site. The design of the building has respected the site's location within a heritage conservation area.

- *Reducing carbon emissions and managing energy, water and waste efficiently*

The proposal incorporates a number of ESD measures, including high performance building fabric and glazing; access card switches to ensure lighting and air conditions within an accommodation unit is off when occupant exits; high energy efficiency air conditioning systems, vertical transport systems, and luminaires; all bathroom fixtures (toilet pans, urinals, hand basin taps and showers) will meet minimum WELS ratings; and a rainwater tank located within the basement level with pump to levels above.

The proposal will also include provision of significant bicycle parking and all tools necessary to perform basic bike repairs and maintenance to encourage bike usage.

6.5. NSW LONG TERM TRANSPORT MASTER PLAN 2012

The *NSW Long Term Transport Masterplan* is a framework that guides subsequent plans, policies, projects, and budgets related to transport for the next 20 years. It seeks to promote the use of public transport as an effective travel option, and to put people first in all initiatives.

The site benefits from being located:

- Within approximately 4.5 kilometres from the Sydney CBD, it is accessible by bus from several bus stops within a 400-metre radius.
- Alongside designated bicycle lanes on Doncaster Avenue which provide access to areas such as UNSW and Randwick Racecourse and in the vicinity of other streets with dedicated bicycle lanes or low traffic volumes.
- The site has access to excellent bus services with eight bus stops provided within optimal walking distance (400m) of the site accessing approximately 23 different bus routes.
- Within a network of pedestrian-friendly streets in Kensington and the broader area.
- Within close proximity to two future light rail stations for the CSELR, approximately 180m and 250m from the site.

Residents can easily cycle or walk to facilities including UNSW, Kensington Town Centre and Centennial Park. Easy access is also provided by bus and train services to facilities and locations further afield. This will reduce reliance on cars, decrease congestion and lessen the environmental footprint.

6.6. BETTER PLACED: AN INTEGRATED DESIGN POLICY FOR BUILT ENVIRONMENT NSW

Better Placed, produced by the Government Architect NSW, aims to provide a clear approach to ensure NSW gets the good design that will deliver the architecture, public places and environments the people of NSW want to inhabit now and in the future. There are seven objectives in the document that have been created to define the key considerations in the design of the built environment. These are:

- **Better fit:** *Contextual, local and of its place*
  The proposal will fit within the character of the local area and is located in an ideal location for access to UNSW and other facilities and areas that students will use.

- **Better performance:** *Sustainable, adaptable and durable*
  Ecologically sustainable design measures are incorporated into the design of the proposal. High quality, hard-wearing materials will be used.

- **Better for community:** *Inclusive, connected and diverse*
  The proposal provides student accommodation with a variety of room configurations and communal spaces.

- **Better for people:** *Safe, comfortable and liveable*
  Refer to CPTED Assessment at **Section 8.2.1** of this EIS. A number of communal spaces, indoor and outdoor, are provided to support the liveability of the development.

- **Better working:** *Functional, efficient and fit for purpose*

The development has been designed specifically for the purpose of student accommodation, thereby enhancing its functionality and useability for this purpose.

- **Better value:** *Creating and adding value*
  The proposal will be of a high standard of design and quality, and it is considered that it will be highly valued by future occupants.

- **Better look and feel:** *Engaging, inviting and attractive*
  The building has been designed to enhance the visual environment through its use of materials and colours, articulation, provision of significant landscaped areas, and communal areas for use by all residents.

The proposal is in accordance with the key considerations of *Better Placed*.

6.7. NSW BICYCLE GUIDELINES, CYCLING ASPECTS OF AUSTROADS GUIDES & SYDNEY'S CYCLING FUTURE 2013

Sydney's Cycling Future seeks to make bicycle riding a feasible transport option within Sydney through the three pillars of safe, connected cycle networks, better use of existing infrastructure, and policy and partnerships. The site is located in close proximity to a dedicated cycleway along Doncaster Avenue, providing central and readily accessible access for cyclists, promoting active forms of transport to the site.

6.8. NSW PLANNING GUIDELINES FOR WALKING AND CYCLING & SYDNEY'S WALKING FUTURE 2013

Sydney's Walking Future (2013) aims to promote walking as a means of effective transport within Sydney by encouraging investment in safe, permeable walking networks. The actions set out in Sydney's Walking Future will make walking the transport choice for quick trips under two kilometres, and will help people access public transport. Increasing the number of people walking will help to reduce the burden on roads, and contribute significantly to community health and wellbeing. The site is located within an established residential neighbourhood within walkable distance to places where people live, work, shop, dine, rest and play.

The document draws from research and consultation with stakeholders by the NSW Government. It found that across Sydney, 15 per cent of people walk the whole way to work. Walking to work takes place more often around major centres and tertiary students have a higher rate of walking than other groups. Connectivity and reduced delays, pedestrian safety and security, health and wellbeing benefits, and supporting facilities will encourage Sydneysiders to walk more.

The proposed student accommodation is very accessible by walking for its residents, as well as from key transport nodes.

7. STATUTORY PLANNING CONTEXT

As outlined in the SEARs, the statutory provisions contained in the following planning instruments were considered:

- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (State & Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy (Affordable Rental Housing) 2009*
- *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy No. 64 – Advertising and Signage*
- *Draft State Environmental Planning Policy (Environment) 2017*
- *Draft State Environmental Planning Policy No. 55 – Remediation of Land*
- *Randwick Local Environmental Plan 2012*
- Randwick City Council Section 94A Development Contributions Plan 2015
- Randwick Development Control Plan 2013

7.1. BIODIVERSITY CONSERVATION ACT 2016

The purpose of the *Biodiversity Conservation Act 2016* is 'is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.'

Clause 2 of section 7.9 of the *Biodiversity Conservation Act 2016* requires a DA for SSD to be accompanied by a biodiversity assessment. An assessment of the proposal against section 1.5 and section 7.3 of the *Biodiversity Conservation Act 2016* and clauses 1.4 and 6.1 of *the Biodiversity Conservation Regulation 2017* has been prepared by Ecoplanning, included at **Appendix N**.

As noted within the biodiversity assessment, no native vegetation communities occur within or immediately adjacent to the subject site and therefore the proposal will not cause impacts to these biodiversity values. There is no vegetation on the site which is in a natural or near-natural state. The proposed development is therefore unlikely to have a significant impact on vegetation integrity as the extent of native vegetation in the surrounding landscape is very low.

The habitat on the subject site is unsuitable for the majority of threatened species that could occur within the locality. Non-endemic trees and shrubs on the site may provide potential foraging habitat for the Grey-headed Flying-fox. However, this is not considered to be important foraging habitat given the extensive habitat in the surrounding area such as Centennial Park. Therefore, the proposed development is anticipated to have a very low level of habitat suitable for threatened species.

The proposed development would not have significant impacts on other biodiversity values as the habitat suitability, connectivity for threatened species, flight paths, and water quality values on the subject site and in the surrounding areas are not likely to be significantly affected.

The biodiversity assessment has concluded that there is not likely to be any significant impact on biodiversity values as defined under the *Biodiversity Conservation Act 2016* and *Biodiversity Conservation Regulation 2017.*

As a result of this assessment the Office of Environment and Heritage and the Department of Planning and Environment confirmed in letters dated 11 January 2019 and 14 January 2019 respectively (refer **Appendix N**) that the development is not likely to have any significant impact on biodiversity values, and therefore the

SSD DA is not required to be accompanied by a Biodiversity Development Assessment Report. As such, the proposal meets the requirements of the *Biodiversity Conservation Act 2016.*

7.2. STATE ENVIRONMENTAL PLANNING POLICY (STATE & 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 52B 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 7** illustrates the site boundary in relation to the SSD area boundary.

Figure 7 – Royal Randwick Racecourse SSD precinct

7.3. 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.

Given the proximity of the site being adjacent to a rail corridor (light rail stabling yards), clause 86 of the ISEPP triggers the consent authority to give notice to the rail authority and take into consideration any notice received. This applies generically to 'adjacent development' as well as 'excavation' adjacent to rail corridors.

Clause 102 of the ISEPP stipulates that for any residential development adjacent to a road with an annual average daily traffic volume of more than 40,000 vehicles an assessment of road noise or vibration impacts

must be undertaken. Alison Road to the north of the site is nominated as having traffic volume more than 40,000 vehicles a day. The Acoustic Report provided at **Appendix O** provides an assessment of the noise and vibration impacts of Alison Road and other adjacent noise sources on the proposed development.

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. While the proposed driveway is situated beyond 90m from the intersection of a classified road, the proposal contains a pedestrian access point within 90m from the intersection of a classified road and therefore the proposal triggers referral to the RMS under clause 104 for traffic generating development.

7.4. 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.

Part 2 Division 3 *Boarding houses* sets out provisions for boarding house development.

Clause 26 *Land to which Division applies* indicates that the Division applies to a series of land use zones including Zone R3 Medium Density Residential. Clause 27 *Development to which Division applies* confirms that the Division applies to development for the purposes of *boarding houses*.

Clause 29 *Standards that cannot be used to refuse consent* stipulates various grounds upon which the consent authority must not refuse consent for boarding house development, provided the development satisfies corresponding development standards. These standards, where relevant to the site, are listed in **Table 6**.

Table 6 – Clause 29 Standards that cannot be used to refuse consent

Grounds	Requirement	Comment	Compliance
Density and scale	(1)(c)(i) if the development is on land within a zone in which residential flat buildings are permitted and the land does not contain a heritage item, density and scale of buildings when expressed as an FSR is not more than the maximum FSR for any form of residential accommodation permitted on the land, plus 0.5:1.	Part of the site contains a heritage item and therefore the 'bonus' permitted under this clause does not technically apply to that part of the site that is heritage listed. The maximum FSR permitted on the site is 0.9:1. Notwithstanding the heritage status of part of the site, inclusive of the 'bonus' FSR the theoretical maximum potential FSR is 1.4:1. The proposed development has a total GFA of 5,978sqm which equate to an FSR of 1.4:1. The proposal is technically non-compliant given the heritage status of the site. A clause 4.6 variation request has been prepared in relation to this aspect of non-compliance.	No Refer to clause 4.6 variation request at **Appendix G**

Grounds	Requirement	Comment	Compliance
Building height	(2)(a) building height not more than max building height permitted under any other EPI.	The maximum building height permitted on the site is 12m. Sections provided with Architectural Plans indicate the building has a maximum building height of 12m and complies with the 12m limit.	Yes
Landscaped area	(2)(b) landscape treatment of front setback compatible with streetscape.	Front setback treatments vary on the eastern side of the street however generally landscaping is provided. Landscaping in the front setback will comprise substantial planted area which will be unencumbered by basement structures. Landscape Plans are provided at **Appendix E**.	Yes
Solar access	(2)(c) where communal living room proposed, 3 hours of direct sunlight is achieved.	The proposal incorporates several communal living rooms within cluster unit types, and multiple communal rooms shared between all occupants. The communal living room fronting Doncaster Avenue will receive direct sunlight from 12:00pm to 4:00pm in mid-winter. Refer to the 'view from the sun' diagrams contained within the Architectural Plans at **Appendix C**.	Yes
Private open space	(2)(d) following private open spaces are to be provided (other than front setback area): • One area of 20sqm with min dimension of 3m for lodgers, • If accommodation is provided for manager, one area of 8sqm with min dimension of 2.5m adjacent to accommodation	Several areas of private open space will be provided including centrally located BBQ and outdoor lounge area which complies with numeric area and dimension requirements. The nominated boarding room manager's residence has an area of private open space which complies with the numeric area and dimension requirements.	Yes
Parking	(2)(e)(iia) for development not carried out by a social housing provider, at least 0.5 parking spaces for each boarding room.	Based on the number of boarding 'rooms' proposed (265- 276 minus the second bed included in twin rooms), 133 spaces are required.	No – Refer to Section 8.1.4

Grounds	Requirement	Comment	Compliance
		The basement accommodates 55 car parking spaces. A clause 4.6 variation request is not required to amend this standard.	
Accommodation size	(2)(f) each boarding room has a GFA of (excluding any area for private kitchen or bathroom facilities) to be at least: • 12sqm for single lodger • 16sqm for other	The smallest 'bedroom' in the development is 8sqm for a single lodger, however these rooms are within clusters that feature private communal rooms. The development also provides additional non-mandatory communal spaces including a variety of shared communal spaces over all levels. The Atira Student Living model encourages occupants to frequently be out of their bedrooms to socialise and interact. This model, including minimum 8sqm rooms are currently successfully operating in other Atira Student Living developments.	No

Clause 30 *Standards for boarding houses* indicates that the consent authority must not consent to development to which this Division applies unless it is satisfied that the development accords with a series of development standards. These standards, where relevant to the site, are listed in **Table 7**.

Table 7 – Clause 30 Standards for boarding houses

Element	Requirement	Comment	Compliance
Communal living room	(a) if five or more rooms proposed, a communal living room is to be provided.	The proposal contains more than five boarding rooms therefore a communal living room is required. The plans demonstrate the location of communal living rooms including primary communal living space at the ground level of the building.	Yes
Boarding room size	(b) no boarding room to have a GFA of more than 25sqm (excluding area for kitchen and bathroom)	The proposal has several boarding room typologies, the largest of which has a total area of 26.4sqm (including bathroom), being the accessible rooms, or 22sqm room in the conserved heritage terraces. The summary schedule indicates area attributable to wet areas which are required to be excluded from the area calculation.	Yes

Element	Requirement	Comment	Compliance
Number of lodgers	(c) no boarding room will be occupied by more than two lodgers	No boarding room will be occupied by more than two lodgers.	Yes
Bathroom and kitchen facilities	(d) adequate bathroom and kitchen facilities available for use by each lodger	Several boarding room typologies are proposed, some of which will have private bathroom and kitchen facilities. Cluster based boarding rooms will rely on shared facilities.	Yes
Boarding room manager	(e) if capacity to accommodate more than 20 lodgers, boarding room to be provided for boarding house manager.	The proposal will accommodate more than 20 lodgers therefore a room for a boarding house manager has been provided for.	Yes
Bicycle and motorcycle spaces	(h) at least one parking space provided for a bicycle and one for a motorcycle for every five boarding rooms.	Based on the number of boarding rooms proposed (268), 54 motorcycle and bicycle spaces will be required. 56 motorcycle spaces and 60 bicycle spaces are provided in the basement level of the development to encourage use of more sustainable transport options.	Yes

Clause 30A *Character of local area* states that the consent authority must not consent to development to which this Division applies unless it has taken into consideration whether the design of the development is compatible with the character of the local area.

The Land and Environment Court has established various planning principles which assist a consent authority in applying to applications to promote consistency. The planning principle for compatibility articulated in *Project Venture Developments Pty Ltd v Pittwater Council [2005] NSWLEC 191* at 22-31 provides a useful summary of assessing compatibility with the character of the local area.

Firstly, it is importantly noted that compatibility is different to sameness, and notwithstanding that the proposed development for a three-storey student accommodation development is different to adjacent residential flat buildings and dwellings does not mean that it cannot be 'compatible' development. Following this acknowledgement there are two useful tests to consider:

- *Are the proposal's physical impacts on surrounding development acceptable?*
- *Is the proposal's appearance in harmony with the buildings around it and the character of the street?*

As detailed in **Section 8** of this EIS, the proposal results in acceptable environmental impacts to surrounding development, consistent with the local planning controls for the site. In answering the second test, Senior Commissioner Roseth states that urban character is created by building height, setbacks, landscaping, and architectural style and materials.

- *Height* – The proposal complies with the relevant height control for the site. Buildings do not have to be the same height as existing development to be compatible. The proposal has articulated the buildings to appear to reduce in scale to the southern portion of the site adjacent to existing single storey development.

  As stated in the Heritage Impact Statement at **Appendix H** *the upper storey of the pavilions located directly adjacent to the heritage-listed terraces at 10-12 Doncaster Avenue, will give the impression of rooms in the roof due to the materiality, providing a gradual transition to the existing one and two storey*

scale of the heritage item located at 10- 12 Doncaster Avenue and the adjacent cottages located to the south.

- *Setbacks and Landscaping* – As outlined at **Appendix C** an analysis of front setbacks along Doncaster Avenue have been illustrated. The proposed front setback (generally 5m) is consistent with the average front setback of adjacent properties along Doncaster Avenue. Further, setbacks are provided between the proposed new building and the retailed heritage listed terraces on the site, with appropriate curtilage as described at **Appendix H**.

  The proposed development provides a landscaped front setback generally consistent with the prevailing front landscape character of the street. The proposed site setbacks comply with the required side setbacks for medium density development within the local development control plan.

- *Architectural Style* – The existing presentation of the heritage-listed terraces at 10-12 Doncaster Avenue will be retained as part of the development. The modulation of the proposed new building elements provides an articulated form that makes refence to the heritage listed terraces and the rhythm of the streetscape. As outlined at **Appendix C** the proposed materials and finishes represent natural shades and tones and do not detract from the architectural styles of adjacent buildings.

As such, it is considered that the proposed developed has been designed to be compatible with the character of the local area.

7.5. STATE ENVIRONMENTAL PLANNING POLICY (VEGETATION IN NON-RURAL AREAS) 2017

State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 (Vegetation SEPP) aims to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation.

The Policy applies to land in Randwick LGA and land within Zone R3 Medium Density Residential, and therefore applies to the site.

The Vegetation SEPP indicates that a person must not clear vegetation in any non-rural area of the State without a permit granted by the council. As stated at **Appendix N**, no native vegetation has been mapped on the site. This SSD DA seeks consent for the removal of 42 trees on and immediately adjacent to the site. Details of the proposed tree removal is provided at **Appendix M**.

7.6. STATE ENVIRONMENTAL PLANNING POLICY (BUILDING SUSTAINABILITY INDEX: BASIX) 2004

Class 1 and Class 2 dwellings are required to be benchmarked by the Building Sustainability Index (BASIX). As this development is Class 3, it is understood that strictly a BASIX assessment under *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004* is not required for the development.

However, pursuant to the findings of *SHMH Properties Australia Pty Ltd v City of Sydney Council [2018] NSWLEC 66* we understand it could be interpreted that BASIX should apply to a boarding house development where the building includes 'self-contained rooms'. As such, the proposed development has been considered against *SEPP (Building Sustainability Index: BASIX) 2004*. As stated at **Appendix DD**, no changes to the architectural design of the building or major changes to the façade will be required to meet minimum BASIX requirements should it be determined that the proposed development is required to comply. Certification to this effect can be provided to the consent authority prior to determination of the SSD DA, if necessary.

7.7. 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 for the remediation of land and aims to promote the remediation of contaminated land to reduce the risk of harm to human health or the environment. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to the issuance of consent to a DA.

The proposed amendment to SEPP 55 currently under consideration by the Department of Planning and Environment does not impact the following assessment as it relates to the site.

Land Contamination

A Phase 1 Preliminary Site Investigation (PSI) report has been provided by Environmental Earth Sciences (Refer **Appendix Q**). The PSI specifies the findings of a preliminary investigation of the site in accordance with the contaminated land planning guidelines and was prepared to provide information on the contamination status of the site and provide recommendations for additional investigation.

At the time of writing the site is not, and has no record of being included on the 'List of NSW Contaminated Sites Notified to EPA'. Historical images dating back to 1943 indicate dwelling houses on the subject site, as well as on adjoining properties, indicating a long history of residential uses on the site and surrounds. There is no evidence of potential land contaminating activities having been carried out on the site or adjoining properties.

The PSI states that the overall risk of contamination of underlying soils or groundwater originating from site is considered low given the non-contaminating use of the site and associated long-term residential land use. The PSI did not identify any additional obvious or significant potential offsite contamination sources located in the properties immediately surrounding the site, and therefore considered that the overall risk of contamination in underlying soils or groundwater resulting from offsite is considered low.

Potential sources of contamination and contaminants on the site can be summarised as some potential filling, exposure to lead petrol in the locality, flaking lead paint potentially impacting surface and near surface soils from existing and former residential buildings, and asbestos impact to surface and near surface soils.

Based on findings of the PSI it is considered that no further detailed assessment is required to delineate potential soil contamination at 10 and 12 Doncaster Avenue, and that given the information gained thus far regarding 8, 14 and 16 Doncaster Avenue may be enough to make predictions of the likely nature and extent of impact for redevelopment purposes.

Groundwater

As outlined within the Geotechnical Assessment at **Appendix R**, groundwater has been recorded on the site at depths between 2m and 2.8m (highest at RL 26.7m). Given the existing ground conditions, the assessment notes that short term fluctuations in groundwater levels of at least 1m may occur during periods of prolonged and heavy rainfall.

The proposed basement level and bulk excavation proposed on the site will therefore be approximately 1.5m below the ground water level on the northern part of the site, and close to the ground water level on the southern part of the site. As such, temporary dewatering will be required as part of the development. The Geotechnical Assessment recommends that proposed basement is tanked and designed for hydrostatic uplift to allow for potential groundwater levels.

Notwithstanding the required dewatering, the Geotechnical Assessment concludes that the proposal would not have any significant impact on groundwater flows or licensed groundwater users.

Acid Sulphate Soils

Testing recorded within the Geotechnical Assessment at **Appendix R** notes that there is no presence of Acid Sulphate Soils on the site within 5m depth and as such this will not represent a constraint to the proposed development on the site.

7.8. STATE ENVIRONMENTAL PLANNING POLICY NO.64 – ADVERTISING AND SIGNAGE

The *State Environmental Planning Policy No.64 – Advertising and Signage* (**SEPP 64**) aims to ensure that signage is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations, and is of high quality design and finish.

There are no advertising signs proposed within this SSD DA. Minor building identification signage is proposed to identify the proposed building as illustrated in the Architectural Plans at **Appendix C**. The proposed signage is consistent with the assessment criteria of Schedule 1 of SEPP 64 as:

- The proposed signage is discrete and compatible with the existing character of the area;

- The proposed signage is not advertising and therefore is not inconsistent with any particular theme of outdoor advertising in the locality;
- The proposal does not detract from residential amenity as it is not illuminated or backlit, and is included within landscape features only;
- The proposed signage is low level, does not obscure or compromise important views, does not dominate the skyline or reduce the quality of vistas, and does not adversely impact the viewing rights of advertisers;
- The proposed signage is of a scale (approximately 0.5m x 2.3m) that can comfortably fit within the existing streetscape character, proposed fence, and front setback landscape features;
- The proposed advertising does not protrude above buildings or tree canopies;
- The front landscaping will be maintained by the Atira Student Living operations and facilities staff and therefore vegetation management around the signage can be accommodated:
- The proposed signage does not require safety devices, platforms, lighting or logos;
- The proposed signage is not illuminated;
- The proposed signage will not adversely impact the road safety for pedestrians, cyclists, and vehicles.

7.9. DRAFT STATE ENVIRONMENTAL PLANNING POLICY (ENVIRONMENT) 2017

The purpose of the proposed *draft State Environmental Planning Policy (Environment) 2017* is to promote the protection and improvement of key environmental assets for their intrinsic value and the social and economic benefits they provide.

Randwick LGA is not identified as being located within a protected water catchment, including the Sydney Drinking Water Catchment, Georges River Catchment, Sydney Harbour, or Hawkesbury-Nepean. The site also does not include any environment 'protected areas', 'waterways', or 'bushland'. As such the proposed development is not inconsistent with the provisions of the *draft State Environmental Planning Policy (Environment) 2017*.

7.10. RANDWICK LOCAL ENVIRONMENTAL PLAN 2012

Randwick Local Environmental Plan 2012 (**RLEP**) is the principal environmental planning instrument governing development at the site. An assessment against the relevant controls of the RLEP has been undertaken in the subsections below.

7.10.1. Land Zoning and Permissibility

The site is zoned R3 Medium Density Residential within the RLEP. The proposed lands use on the site include being a 'boarding house' is permissible development with consent in the R3 Medium Density Residential zone. The proposal is consistent with the objectives of the R3 Medium Density Residential zone as:

- The proposal will provide for student accommodation within a medium density residential environment, on a site that is located opposite a number of 3-4 storey residential flat buildings.
- The site is particularly suitable for student accommodation as it is situated in close proximity to the Carlton Street light rail stops and is a relatively short 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 and TAFE, makes the site well suited to student accommodation.
- The proposed development provides three storey student accommodation within an area characterised by private dwellings of a mixture of sizes and scales, from single storey detached dwellings to four storey residential flat buildings.
- The student accommodation provides variety to the housing and accommodation types within the locality.

- If the development standard is maintained, the highest and best use for the site would otherwise be private residential flat buildings (also with a height of 12m) as was previously approved on the site. The proposal provides for a diversity of housing types in the locality that would otherwise not be delivered by a compliant scheme.
- From recent population growth and increases in planning controls, in addition to the investment in significant public transport in proximity to the area, Kensington is undergoing transition.
- Articulation and variety in material and colours are incorporated into the façade of the proposed development to contribute to the desired future character of the area, while taking inspiration for building elements from the past.
- The façade of the proposed development is designed with vertical elements to reflect the existing streetscape/built form elements provided by the single storey Victorian dwellings south of the site.
- The amenity of residents will be protected through mitigation of overshadowing impacts on the adjoining building to the south by including only a single storey of development in the south-eastern corner.
- Privacy screens have been provided to rooms at the southern end of the student accommodation so that the adjoining building to the south is not impacted by overlooking.
- The proposed development will provide a high level of amenity for future residents of the development and will not adversely impact upon other aspects of amenity for neighbouring residents.
- The proposed development will provide affordable housing for students through the diversity of room types, including 54% cluster or twin studio rooms.

7.10.2. Development Standards

Notwithstanding the development controls contained within the ARH SEPP the proposal is also required to be assessed against the relevant SLEP development standards in **Table 8** below.

Table 8 – Relevant RLEP Development Standards

Consideration	Control	Proposal	Compliance
Clause 4.3 Height of Buildings	Maximum 12 metres.	12m	YES
Clause 4.4 Floor Space Ratio (FSR)	Maximum FSR of 0.9:1	1.39:1	No – Refer to **Appendix G** and **Section 8.1** of this EIS
Clause 5.10 Heritage Conservation	The site contains as local heritage item (I122) “2 storey terraced pair” located at 10-12 Doncaster Avenue. The site is also within the Racecourse heritage conservation area (C13)	The proposal includes demolition works to buildings within the heritage conservation area, and works including demolition and conservation to the local heritage item on the site.	Partially. Refer to **Appendix H** and **Section 8.1.3** of this EIS
Clause 6.2 Earthworks	Earthworks are not to have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or	A sediment and erosion control plan are provided at **Appendix F.** The extent of earthworks has been minimised as much as possible. The proposed excavation for a single level	YES

Consideration	Control	Proposal	Compliance
	features of the surrounding land.	basement has considered the existing ground condition of the site to mitigate impacts on neighbouring development.	
Clause 6.3 Flood Planning	Development is to be compatible with the flood hazard of the land, not adversely impact the potential flood affection of other properties, manage flood risks, and not likely result in unsustainable social and economic costs to the community as a consequence of flooding.	The site is affected by flooding in the 1% AEP flood event from the Kensington-Centennial Park catchment. The proposed development has been designed to comply with nominated flood planning levels, and flooding is mitigated through the provision of flow paths through the site.	YES – refer to Section 8.1.6 of this EIS and **Appendix Z**.
Clause 6.4 Stormwater Management	Development is to be designed to maximise the use of water permeable surfaces on the land, include on-site stormwater retention, and avoid any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters.	A stormwater management plan is provided at **Appendix F.** As noted above, potential stormwater runoff and localised flooding is proposed to be mitigated through on-site detention and permeable flow paths through the site.	YES
Clause 6.10 Essential Services	Development consent must not be granted unless services that are essential for the development are available or that adequate arrangements have been made to make them available when required.	As outlined at **Appendix V,** the site can be adequately serviced through minor augmentation of services.	YES

7.11. SECTION 7.12 CONTRIBUTIONS

The site is covered by Randwick City Council Section 94A Development Contributions Plan 2015, which authorises the Council to collect contributions of money, land or both from developers to provide for local infrastructure needed by the relevant development. The plan was prepared in reference to section 7.12 of the EP&A Act.

Pursuant to the plan, the following development requires a contribution:

- Development that exceeds a cost of carrying out development of $100,000; and
- Development that is not excluded in accordance with the clause 13 of the Development Contributions Plan.

As the development results in a net population increase across the site and the cost of carrying out development exceeds and does not satisfy any exemptions, a levy of up to 1% of the development cost will be charged to the developer to contribution to local infrastructure needs.

7.12. RANDWICK DEVELOPMENT CONTROL PLAN 2013

Randwick Development Control Plan 2013 (**RDCP**) provides detailed controls for specific developments types and locations. Most controls in the SDCP relate to character, streetscape and public domain works.

However, under Clause 11 of *State Environmental Planning Policy (State and Regional Development) 2011*, the application of local development control plans is excluded when assessing DAs for SSD projects. As such the RDCP does not technically apply to the SSD DA. Notwithstanding this, the proposal has been assessed against the key relevant controls of the RDCP in **Table 9**.

Table 9 – Randwick DCP 2013 Compliance Table

Reference	Provision	Proposal	Compliance
Part B – General Requirements			
4.12 Racecourse Precinct Heritage Conservation Area	The residential properties on the eastern side of Doncaster Avenue form a straight street frontage almost a kilometre in length, with a predominantly Victorian and Federation period character. This housing is representative of the larger Kensington precinct, on either side of Anzac Parade.	Refer to the Heritage Impact Statement at **Appendix H**.	Yes
B7(2.4) Student Accommodation	Student housing and other forms of residential development, such as boarding houses approved by Council in accordance with this DCP will also not be permitted to apply for parking permits.	The operation of the proposed development assumes occupants will not be permitted to apply for parking permits.	Yes
Part C – Adaptable and Universal Housing			
2 Universal Housing and Adaptable housing	To ensure a suitable proportion of dwellings include layouts and design features to accommodate changing mobility requirements of residents.	An accessibility report has been prepared to support the SSD DA included at **Appendix X**. There are five proposed rooms designed to be accessible in accordance with AS1428.1. Although this does not satisfy the minimum number under the DDA Premises Standards (8), MGAC are able to support this situation under a Performance Solution given the proposal is for a student accommodation.	No – however justified on demographic analysis
Part C – Medium Density Residential			

Reference	Provision	Proposal	Compliance
2.2.1 Landscaped open space	While the Medium Density Residential section of the RDCP does not strictly apply to the development, in designing the development the following local controls have been considered: • 43% of the site is landscaped (57% site coverage). While not meeting 50% in the DCP, this is a significant proportion of the site compared to residential flat buildings and as required to the Apartment Design Guide. • 22% of the site is deep soil landscaping. • Maximum building height complies with the relevant height control. • Maximum building depth is less than 14m. • Front setback exceeds 3m (average 5m). • Side setbacks exceed 4m. • Rear setbacks, whilst not compliant with the RDCP provisions, are appropriate considering the site interface with the Light Rail Stabling Yards. • The buildings have been designed to address the street frontage. • The building facades are articulated to present a human scale (2 to 3 storeys). • On the southern boundary the proposed built form complies with the maximum 10.5m external wall height control (stepping up to 12m). • All communal corridors have access to natural light. • Privacy screens are applied to level 1 and 2 south facing windows to protect privacy of adjacent residential dwellings. • Communal areas are positioned away from neighbouring residential dwellings to minimise acoustic impacts. • Fencing is up to 1.8m in height and is designed to be porous.		Generally Consistent
Part C – Boarding Houses			
2.1 Boarding Rooms	i) Orientate to receive the maximum amount of sunlight; ii) Provide a balcony, terrace or window opening to outdoor areas for natural light and ventilation; and iii) Where provided, private open space in the form of a balcony or	The proposed building massing has been designed to reduce the number of south facing boarding rooms. All boarding rooms have access to natural light and ventilation, and while they do not have private balconies, have access to significant communal indoor and outcome space and amenities.	Yes

Reference	Provision	Proposal	Compliance
	terrace must have a minimum useable area of 4 square metres.		
2.2 Outdoor Communal Open Space	i) Provide for all boarding houses, with a minimum total area of 20sqm and a min. dimension of 3m; ii) Provide at ground or podium level in the form of a courtyard or terrace area, accessible to all residents iii) Locate and orientate to maximise solar access; iv) Incorporate both hard and soft landscaped areas; v) Provide shared facilities such as fixed outdoor seating benches, barbecues and the like to allow social interaction; and vi) Provide partial cover for weather protection, such as pergola, canopy or the like, where it does not cause unreasonable overshadowing on adjoining properties.	498sqm of communal outdoor landscape areas at ground level is proposed. The communal open space has been designed to be positioned away from neighbouring residents to mitigate potential noise or amenity impacts. The communal open space proposed includes hard and soft landscape areas, shared facilities that are designed to allow social interaction, and weather cover where possible.	Yes
2.3 Indoor Communal Living Areas	i) Provide with a minimum dimension of 3m and a minimum total area of 20sqm or 1.2sqm/resident, whichever is greater; and ii) Orientate to maximise solar access and have a northerly aspect where possible.	331sqm of communal internal space is required, and 374sqm of communal internal space is provided. The communal internal space has been designed to open out to communal open space. The communal open space on Doncaster Avenue will achieve afternoon sun in midwinter.	Yes
2.4 Communal kitchen, bathroom, and laundry facilities	i) For all boarding houses, provide communal kitchen, bathroom and laundry facilities; ii) male and female residents; iii) Locate and design any communal laundry room to minimise noise impact on	Communal bathroom, laundry, kitchen, study, entertaining and social facilities are provided throughout the development. Communal facilities are located away from the southern site boundary to minimise noise impact on neighbouring properties.	Yes

Reference	Provision	Proposal	Compliance
	boarding rooms and neighbouring properties; and		
2.5 Safety and crime prevention	i) Locate building entry points and internal entries to living areas where they are clearly visible from common spaces; ii) Locate a habitable living area (such as lounge room, kitchen, dining or bedroom) to allow general observation of the street and communal open space; iii) Separate ground level private open space from public and common areas by measures such as open fencing or low level plants; and iv) Select trees and low-lying shrubs that do not interfere with sight lines nor provide opportunities for concealment or entrapment.	Communal internal space is proposed adjacent to the Doncaster Avenue street frontage to provide a legible street address and development entry, activate the street, and provide passive surveillance opportunities. Open fencing is proposed to enable casual surveillance. Planting described at **Appendix E** has been selected to minimise opportunities for concealment and entrapment. Refer to the CPTED Assessment at S**ection 8.2.1** of this EIS.	Yes
2.6 Visual and acoustic amenity and privacy	ii) Locate kitchen, dining room, lounge room and outdoor open space adjacent to or directly accessible from each other. iii) Locate similar uses back to back, to minimise internal noise transmission; iv) Provide screen fencing, plantings and acoustic barriers where practicable to screen noise and reduce visual impacts; v) Where possible locate the main entry point at the front of the site vii) An acoustic report must be submitted for new development	The principles to minimise visual and acoustic amenity and privacy have been adopted within the Architectural Plans at **Appendix C**. The main entry of the development is at the front of the site. An acoustic assessment is provided at **Appendix O**.	Yes
3 (i) Management Plan	i) Submit a Management Plan with all DAs for new boarding houses	Refer to **Appendix BB**.	Yes

8. IMPACT ASSESSMENT

8.1. IMPACTS ON THE NATURAL AND BUILT ENVIRONMENT

8.1.1. Built Form and Urban Design

Streetscape Rhythm

While the proposed development is of a contemporary design, it has been influenced by the rhythm and character of two storey filigree terraces and the historic subdivisions of the locality. As such, the building has been deliberately broken down into three storey forms with a maximum width of between 6 and 7.5m fronting Doncaster Avenue as highlighted at **Figure 8** below.

The proposed building elevations are highly articulated to provide a contextually appropriate built form. The articulation has been designed to reflect the vertical façade elements of the Victorian houses further south on Doncaster Avenue as illustrated below.

Figure 8 – Articulated facades with Victorian proportions

Source: Hayball Architects and Urbis (markup)

The new development is appropriately set back from the heritage item to allow the heritage item to sit within the site as a stand-alone feature. This will highlight its significance in the local area and allow it to be viewed from all sides, both within and outside of the subject site. As described in **Section 8.1.2** and **Appendix H**, the proposal provides a curtilage around the heritage item that is supportable from a heritage perspective.

Design Excellence

The proposal does not trigger a requirement under local controls to undertake a competitive design process for the development. The applicant however consulted within the Government Architect's Office during the design stage, and feedback received to date has been included within the proposed development.

Gross Floor Area and Scale

The GFA and FSR proposed as part of the SSD DA is considered appropriate for the site, as articulated within the clause 4.6 variation included at **Appendix G** and in summary:

- By allowing the inclusion of an FSR bonus for boarding houses otherwise permitted by the ARH SEPP, development on the site can compete with the private residential market and can therefore provide a diversity of housing choices, affordable housing, and options suitable to the demographics of the locality.
- It is considered a better outcome for the site, for planning and streetscape reasons, to repurpose the heritage building by incorporating it into the student accommodation development rather than it being subdivided out of the site area.

- The buildings have been designed to be well articulated through window placement, choice of materials and colours and breaks in the street façades, all of which reduce the appearance of bulk and break up the façade of the proposed development when viewed from street frontages.
- The opposite side of Doncaster Ave is characterised by 3-4 storey residential flat buildings, with the proposed development being of a similar scale to those buildings. The development therefore forms a consistent character with the existing residential flat buildings at the northern end of Doncaster Ave.
- Potential impacts upon the amenity of the surrounding area will be minor or can be mitigated to an acceptable level.

8.1.2. Environmental Amenity

The potential environmental amenity impacts resulting from the proposed development are considered to be residential amenity, overshadowing, visual privacy, and wind impacts. Each of these amenity impacts are considered in the following sections.

Student Room Sizes

The proposed development encourages a high level of occupant amenity as described within the Design Report at **Appendix C**. The proposed development has been designed to as a purpose-built student accommodation development that will suit the operating needs of Atira Student Living. Proposed studio and twin rooms are designed to provide private cooking facilities, storage, separate desk and eating space, double bed (or two king single beds), private bathroom, and an operable window.

Cluster rooms private shared cooking facilities (in addition to the wider communal facilities provided) an eating area, lounge area and shared bathrooms per approximately two rooms. Bedrooms within clusters are approximately 8sqm in area with adequate space to sleep and study, with storage, a king single bed, desk, and operable window. These spaces are supplemented by providing additional non-mandatory communal spaces.

While we note that that ARH SEPP denotes a minimum room area of 12sqm, it is important to provide appropriate bedroom sizes within a development such as this to provide an adequate level of overall living amenity for students together with promoting affordability.

This design is encouraged through student accommodation providers to encourage occupants to socialise and interact in the generous amount of communal space provided. Examples of operating facilities with similar cluster mix and dimensions include Atira Waymouth Street (SA) and Atira Glen Road (QLD). The size of these bedrooms and clusters are consistent with the requirements of the Victorian Department of Human Services ‘Minimum Standards in Rooming House Accommodation’.

Solar Access and Overshadowing

The orientation of the proposed building has sought to maximise the number of north, east, and west facing boarding rooms and minimising the number of south facing windows to ensure a high degree of solar access and residential amenity is provided to occupants. Communal open space at the northern portion of the site is designed to received morning light (to at least 50sqm in mid-winter), and communal open space at the Doncaster Avenue boundary will receive direct sunlight from midday in mid-winter.

The proposed development does not result in any significant shadow impacts to properties to the east or west of the site. As stated by Randwick City Council in the assessment of (D80/16) in October 2016, overshadowing of the property immediately to the south of the site is inevitable due to its existing setbacks and orientation.

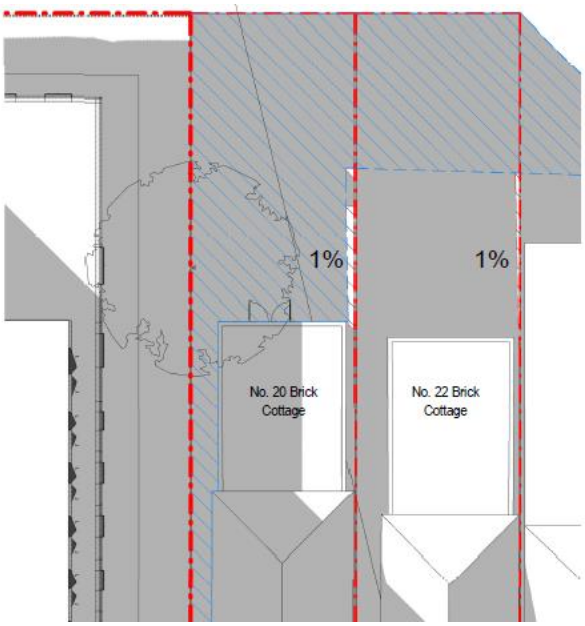
The proposed development does not increase overshadowing on 22 Doncaster Avenue, or any residential dwelling south of 22 Doncaster Avenue prior to midday in mid-winter. Moderate additional overshadowing occurs to the private open space of 22 Doncaster Avenue from midday, however the private open space at 22 Doncaster Avenue maintains a useable area of private open space with direct sunlight in mid-winter until 2:00pm as illustrated in the shadow diagrams included at **Appendix C**.

The proposed development was designed to minimise shadowing impacts to 20 Doncaster Avenue in the morning at mid-winter from 8:00am to midday. Shadow impacts of the proposed development to 20 Doncaster Avenue were modelled as compliant with local planning controls with the exception of existing fence lines. Existing fence lines largely shadow the rear private open space of 20 Doncaster Avenue as illustrated in blue below.

The shadow diagrams included at **Appendix C** demonstrate that the proposed development does not result in any additional overshadowing to the rear private open space at 20 Doncaster Avenue at 8:00am. The additional overshadowing resulting from the proposed development at 9:00am on 20 Doncaster Avenue is moderate, as highlighted in red at **Figure 9**. To minimise shadowing impacts to 20 Doncaster Avenue two levels of the development were removed from the rear of the development. Further, the upper two levels of the southern portion of the building are setback to reduce scale of the building to the southern boundary, and improve solar access.

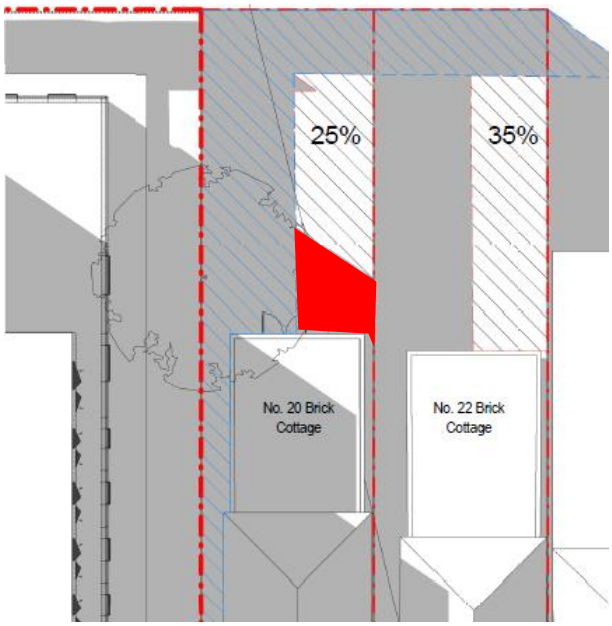
The proposed shadow impacts are considered acceptable on the grounds that the development complies with the maximum height control for the site and adheres to the side setback provisions required by the RDCP 2013 notwithstanding it does not apply to the SSD DA.

Figure 9 – Shadow impacts to 20 and 22 Doncaster Avenue in mid-winter



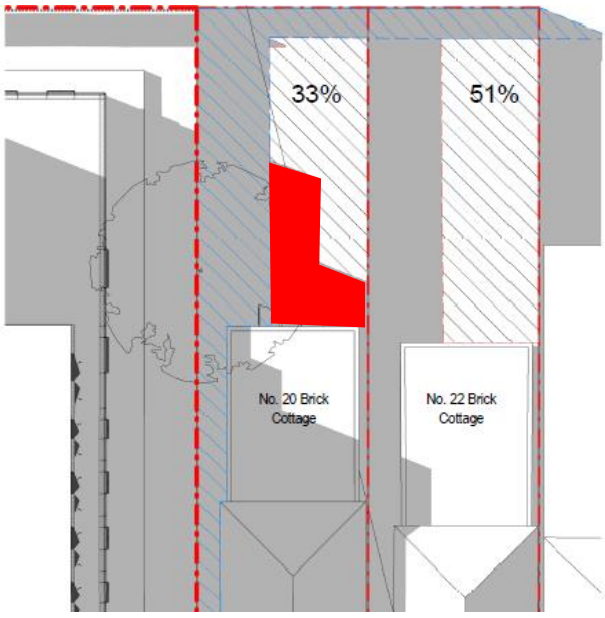
Picture 4 – 8:00am

Source: Hayball Architects



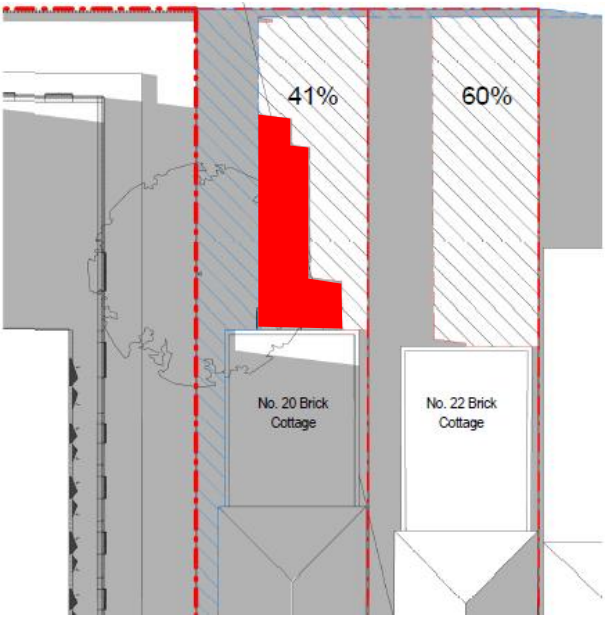
Picture 5 – 9:00am

Source: Hayball Architects



Picture 6 – 10:00am

Source: Hayball Architects



Picture 7 – 11:00am

Source: Hayball Architects

Visual Privacy

Visual privacy between rooms on the site are mitigated through the offsetting of windows and the location of communal open space generally orientated away from residential studios. The site contains one immediate residential neighbour at 20 Doncaster Avenue, benefitting from an inactive northern and eastern boundary. To mitigate potential visual privacy concerns on the southern boundary, shrouded windows orientated to the west away from the private open space of 20 Doncaster Avenue are proposed.

Further, as a result of flood planning levels, rooms proposed to face Doncaster Avenue are approximately 1.2m higher than the adjacent footpath level, affording the boarding rooms privacy from the street.

Wind impacts

The proposed development does not include the provision of any clusters of towers or 'tall buildings', usually associated with adverse wind impacts for pedestrians. The proposed development has a maximum height of 12m and generally follows previously approved building massing on the site. As such, the proposed development is unlikely to generate any significant wind impacts.

8.1.3. Heritage

Built Form European Heritage

The site includes a local heritage item and is located within a heritage conservation area. As such the EIS is required to consider the impact the proposed works will have on the heritage significance of both the overall heritage item and the heritage conservation area.

A Heritage Impact Statement (HIS) has been prepared by GBA Heritage and is included at **Appendix H**. The HIS describes the existing development on the site as comprising the following heritage values:

4-8 Doncaster Avenue – within heritage conservation area

- The single storey Federation Arts and Crafts style house at 4-8 Doncaster Avenue was erected around 1914 for use by senior Racecourse staff.
- The structure of the house would require substantial stabilisation such as underpinning to retain.
- The building makes a limited aesthetic contribution to the heritage conservation area due to its isolated location.

10-12 Doncaster Avenue – Locally heritage listed, heritage conservation area

- The two storey Victorian Filigree semi-detached terraces at 10-12 Doncaster Avenue were constructed circa 1896, with the property at No 10 being used as stables or riding school by a series of owners.
- Overall the pair of terraces are generally in sound condition, though both feature degrees of alterations and additions. The terraces contribute to the aesthetic significance of the heritage conservation area.
- The building is one of a number of similar Victorian Filigree semi-detached terraces in the local area and there are no elements of the site that are considered to be of exceptional significance.
- The overall form of the front of the building, street presentation, and rooms within the main component of terraces have high significance.
- The existing rear wings, storage room, studio, outbuildings, and ground floor additions have little to moderate significance to the item.

14-16 Doncaster Avenue – within heritage conservation area

- The existing single storey Federation red face brick semi-detached dwelling at 14-16 Doncaster Avenue is believed to have been constructed in late 1910-early 1911.
- While the dwellings appear to be in satisfactory they have heavily diminished integrity through successive alterations to heritage fabric (heavily modified) that have irrevocably and negatively affected their presentation within the streetscape. As such, they do not contribution to the aesthetic significance of the heritage conservation area.

Given the above, the HIS concludes that the demolition of 4-8 Doncaster Avenue, and 14-16 Doncaster Avenue is supportable from a heritage perspective. Specifically, the HIS notes that the loss of the

contributory building at 4-8 Doncaster Ave is relatively marginal and that it is considered unreasonable that the existing dwelling be retained. Further, the retention of 14-16 Doncaster Avenue is not considered necessary given their diminished integrity and lack of association with the principal historical activities of the area.

With regards to the modifications to 10-12 Doncaster Avenue, the HIS notes that no important features of the building are proposed to be demolished, with high value features retained and conserved as part of the development. This HIS concludes that the proposed addition to the rear of the dwellings at 10-12 Doncaster Avenue are subservient to the main form and supportable.

The HIS notes that while the proposed development is contemporary, it has been designed to be sympathetic to the heritage item on the site and includes an adequate visual curtilage. The design of the upper level of the development at the southern portion of the site provides a gradual transition to the two-storey character of 10-12 Doncaster Avenue and the lower scale development to the south.

The HIS concludes that overall, there will be no adverse impact on the heritage items in the vicinity, and that the proposal is consistent with the relevant local heritage objectives described within the RLEP 2012. An archival photographic recording of the site is recommended prior to works commencing.

Historical Archaeology

Given the proposed excavation and ground works proposed for the development, an Historical Archaeological Assessment has been prepared by the GML Heritage and is included at **Appendix I.**

The Archaeological Assessment has found that the study area has high potential for historical archaeological evidence relating to subdivision and development of the site from circa 1893. This is evident through structural remains of former houses at 14 and 18 Doncaster Avenue, along with numerous outbuildings.

The assessment of the significant of the potential historical archaeological remains has identified that the likely structural remains hold little or no archaeological significance. Anticipated remains are unlikely to meet the threshold for local significance and would not be considered ‘relics’, as defined by the *Heritage Act 1977*.

The following historical archaeological recommendations are made:

- If potentially significant historical archaeological remains not identified in this assessment are encountered during works, works should cease in the immediate area and a qualified historical archaeologist should be contacted to inspect them and assess their significance.
- If the archaeological remains are assessed as being of local or state significance by the archaeologist, the Heritage Division should be notified under section 146 of the *Heritage Act 1977*.
- In this instance, an archaeological mitigation strategy would need to be developed, including an archaeological research design, excavation methodology and the need for post-excavation reporting and possibly interpretation.

Aboriginal Archaeology

Aboriginal Heritage advice was prepared by GML Heritage dated 12 December 2018 (refer **Appendix J**). An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the project in 2017 (appended to **Appendix J**). Consultation with the DPE has confirmed that the ACHAR prepared in 2017 is adequate to address the SEARs.

Consequently, an application was made to the NSW Office of Environment and Heritage (OEH) for an Aboriginal Heritage Impact Permit (AHIP) to allow direct harm to Aboriginal site 45-6-3245 and indirect harm to Aboriginal site 45-6-3246, through a process of conservation.

The OEH issued AHIP C0003723 on 22 June 2018 (appended to **Appendix J**). The AHIP has 33 conditions that must be followed during future works associated with the site. These works include a range of conservation requirements, archaeological management and mitigation measures. Prior to any development commencing, the zone for conservation will need to be clearly established. This area should not be subject to any impact, other than conservation, during all works.

The archaeological work specified under the AHIP will need to be completed prior to any construction work commencing.

Once issued, the new DA will need to be submitted to the OEH and the AHIP can be transferred to the applicant of the SSD DA. This process has been confirmed through consultation with OEH as stated at **Appendix J**.

8.1.4. Traffic and Parking

Car Parking

A Transport and Accessibility Report has been prepared by Traffix and is attached at **Appendix L**. A total 56 car parking spaces, 54 motorcycle spaces, and 60 bicycle spaces are proposed within the development.

Car parking for occupants is proposed to be provided at a rate of 0.2 car parking spaces per 'boarding room'. Included within the Transport and Accessibility Report is an overview of other student accommodation development which demonstrates that a car parking provision of 0.2 car parking spaces is adequate to service demand, and in many instances, is not required.

Notwithstanding the demographics of the facility do not generate high levels of car ownership, to manage car ownership of residents, the following mitigation measures are proposed:

- Occupants will not be eligible for on-street parking permits through Randwick City Council;
- Five car share spaces are proposed within the development;
- Ample bicycle and motorcycle parking is proposed in accordance with the requirements of the ARH SEPP; and
- A Green Travel Plan will be implemented for occupants.

The proposed car parking proposed on the site is therefore considered an appropriate balance between a community expectation of car parking spaces being provided, and the demand for car parking spaces generated by equivalent student accommodation premises.

Traffic Generation

The assessment of traffic generation was undertaken on the basis of rates proposed by the RMS TDT 2013/04a for High Density Residential Flat Dwellings (Sydney Average), as neither this document nor the RMS Guide to Traffic Generating Developments 2002 have any reference to traffic generation rates for student accommodation or boarding houses. Therefore, the following peak period traffic generation rates are assumed:

- 0.09 trips per bedroom during AM peak
- 0.07 trips per bedroom during PM peak

The resulting net increase in traffic generated by the proposed development is 21 vehicle trips during the AM peak period, and 15 vehicle trips during the PM peak period. The Traffic and Parking Assessment notes that this additional traffic generation would be diluted as the distance from the site is increased and that impacts to the surrounding intersections are predicted to be minimum and within the typical fluctuations in background traffic volumes.

Access and egress for residents and visitors will be provided via a 4.5m access driveway on Doncaster Avenue, with traffic lights providing right of way to vehicles entering and exiting the site. A queueing analysis was undertaken as part of the Traffic and Parking Assessment (**Appendix L**) which demonstrates that there is a 0.1% chance that two vehicles will utilise the driveway at any one time. As such, the 4.5m wide driveway with traffic lights is considered acceptable for this development.

Construction Vehicles

A preliminary Construction Traffic Management Plan has been prepared by Traffix (**Appendix L**) which anticipates likely construction traffic movements. It is anticipated that the maximum sized vehicle required during the demolition and construction phase will be a Heavy Rigid Vehicle, which can comfortable access the site from Doncaster Avenue via Alison Road.

Site hoarding will be provided along the Doncaster Avenue frontage, with pedestrians only impacted during the construction period by vehicles accessing the site, when gate barriers will be deployed.

8.1.5. Noise and Vibration

Operational

The Noise and Vibration Assessment provided at **Appendix O** provides an assessment of nearby noise sources on the proposed development. The assessment considers noise generated from nearby roads including Alison Road, the adjacent Light Rail Stabling Yard, and ongoing operations at the Randwick Racecourse. The Noise and Vibration Assessment concludes that with the following mitigation measures, acoustic amenity can be achieved for future residents of the proposed development:

- Glazing with a 6.38mm thickness and acoustic seals are required for residential studios on the eastern, southern, and western façades;
- Glazing with a 10.38mm thickness and acoustic seals are required for residential studios on the northern façade; and
- Standard external wall and roof masonry construction.

On-going operational noise emissions associated with the proposal are expected to be generated from the following sources:

- Mechanical services plant; and
- Potential noise from communal areas.

The Noise and Vibration Assessment at **Appendix O** outlines mitigation measures for mechanical services plant noise emissions to surrounding properties. The proposed design of the building has positioned communal areas away from the southern boundary of the site and nearby sensitive receivers to ensure a barrier is provided to neighbouring dwellings. Further, the operation of the proposed development must comply with an Operational Management Plan (Refer **Appendix BB**) which will define noise management guidelines for occupants.

Construction

There is potential for noise and vibration impacts during construction of the proposed development due to the proximity of surrounding residential land uses. Careful management will be required to minimise acoustic and vibration impacts during construction. These measures will be accurately determined in detail when a contractor has been engaged. Notwithstanding this, the following project-specific mitigation measures are recommended:

- A detailed project Construction Noise and Vibration Management Plan is recommended prior commencement of construction.
- For standard construction hours Monday to Friday 7:00am to 6:00pm and Saturday 8:00am to 1:00pm, noise levels at adjacent residential boundaries should not exceed 10dBA above the background noise level without noise mitigation measures.
- Where predicted or measured noise levels exceed the above levels all feasible and reasonable mitigation measures to reduce noise should be carried out. This could include the installation of additional hoarding around the construction site, regulating hours for high noise activities, and localised treatment around fixed plant.
- Vibration monitoring is recommended for the southern boundary during demolition and excavation to ensure vibration levels do not exceed the nominated values within the Noise and Vibration Assessment at **Appendix O**.

8.1.6. Drainage and Flooding

Stormwater Management

A Stormwater Management Plan has been prepared by Michael Bale & Associates and is at **Appendix F**.

The report addresses the management of stormwater quantity and quality. Council water quality controls require measures to be implemented if open car parking or hard stand areas exceeding 200sqm, or new roads are proposed, including a minimum of one pollutant trap, water sensitive urban design treatments, and submission of a design report from a suitably qualified environmental consultant.

As the proposed development involves hardstand areas well in excess of 200sqm, a stormwater quality improvement device in accordance with Council requirements shall be implemented as part of the drainage system.

Key infrastructure elements that are proposed to ensure the management of stormwater to achieve necessary standards, are the following:

- A 171m^3 detention tank to receive flows from the proposed development;
- A Gross Pollutant Trap system to treat minor flows from the development site.

Sediment and erosion control measures will be implemented in accordance with the submitted Sediment and Erosion Control Plan (**Attachment F**).

The report concludes that the proposed stormwater quantity and quality management systems are suitable for a development of this scale and potential impacts and no additional works are required to ensure that the proposed development complies with all necessary state and local government policies.

Flooding

The site is affected by flooding in the 1% AEP flood event from the Kensington-Centennial Park catchment. The Flood Assessment including at **Appendix Y** clarifies changes that have been made to Council's TUFLOW model to understand the latest flood behaviour and flow distribution around the site. Flood Planning Levels have been nominated for the site in accordance with the flood certificate as outlined in the Flood Assessment. In summary the relevant flood planning levels for the site that have informed the proposed development include:

- 1% AEP flood depths across the site range from 0.6 m at the northern boundary to 0.7 m to the south of the site;
- The 1% AEP flood level for the site varies between RL 29.21m at the northern end of the site and RL 28.65m at the southern end of the site;
- The adopted underground car park driveway entry ramp crest level is RL 28.95m which provides 0.3m freeboard to the 1% AEP flood level at the entry;
- All emergency exits from the basement are via stairwells to the ground floor level which is at least 0.5m above the 1% AEP flood level and at least 0.2m above the driveway ramp crest level;
- All other openings to the basement will be sealed up to the 1% AEP flood level plus 0.5m freeboard;
- The Probable Maximum Flood (PMF) depths range from 2.2m to 2.3m across the site; and
- In the event of a PMF event, a shelter-in-place emergency refuge is available on-site to the first and second floors which are above the PMF level.

To manage the flood water affecting the site and to mitigate impacts resulting from the proposed development on surrounding properties, the proposal includes:

- Perimeter fencing will incorporate a low level permeable mesh that extends from ground level to 0.5m above the 1% AEP to avoid localised pooling;
- Several voids (with permeable coverings) are proposed below the ground level to allow for floodwater to be conveyed through the site, mimicking current floodwater behaviour; and
- Dedicated flood transfer areas outside the building footprint (but in the site area) are proposed, which are to be kept clear from planting pods or other obstructions which could adversely impact floodwater pathways.

Following testing of the above mitigation measures, the Flood Assessment confirms that the resulting flood levels closely match the existing baseline scenario and therefore appropriately mitigate the potential impacts of the development on flood waters. The architectural plans provided at **Appendix C** accommodate the above flood levels and flood mitigation measures.

8.1.7. Waste

An Operational Waste Management Plan (OWMP) has been prepared by Elephants Foot and is attached at **Appendix T** to support the SSD application. The OWMP has three key objectives:

i. Promote responsible source separation to reduce the amount of waste that goes to landfill, by implementing convenient and efficient waste management systems

ii. Ensure adequate waste provisions and robust procedures that will cater for potential changes during the operational phase of the development

iii. Compliance with all relevant council codes, policies, and guidelines.

It is estimated that given the number of rooms proposed that the development will generate a total of 17,388 litres of waste and 5,796 litres of recyclables per week. Occupants will be responsible for emptying their personal or cluster waste in the communal waste room in the basement, however the building manager will be responsible for emptying waste into the communal waste room for waste and recycling deposited within communal areas.

Bins are collected adjacent to the bin storage area within the basement by private waste collection. The bin storage area has been designed to accommodate bins to be collected on average twice a week by private collection. Private waste collection is considered appropriate for the site, as:

- Bin storage area of 100sqm (as otherwise suggested by Randwick Council controls) is not appropriate for a boarding house, as these operate with a greater density of people on a smaller footprint of land compared to a standard residential development.
- University semester fluctuations in occupancy will affect the volume of waste generated on site and required collection. As stated by Elephants Foot “the servicing of the bins by private contractor offers the boarding house operators more flexibility to adjust collection frequencies to respond to fluctuations of occupants and to more effectively manage waste during operation”.
- By accepting private waste collection, a great percentage of the street frontage can be proposed as active frontages rather than being required for large areas for waste storage and collection on site.
- Randwick Council’s Waste Management Guidelines state that ‘Boarding House’ are classified as commercial premises for the purposes of waste collection, and as such private waste collection is an appropriate mitigation measure for waste management. This classification of the proposal as a commercial premise for the purposes of waste management is consistent with the relevant NSW EPA Guidelines and other NSW Council policies.

8.1.8. Construction Impacts

The overall duration of the project is expected to take a minimum 15 months from construction commencing. To mitigate potential construction impacts on surrounding development, the following measures will be undertaken:

- Compliance with the conditions of consent from any DA applying to the development.
- Completion of dilapidation reports of surrounding buildings, infrastructure, and roads prior to construction.
- Monitoring vibration during demolition and excavation on the southern property boundary.
- Compliance with a completed Construction Management Plan, and Construction Traffic and Pedestrian Management Plan.
- Mitigation measures such as additional hoarding around the construction site, regulating hours for high noise activities, and localised treatment around fixed plant should noise impacts exceed the nominated levels.
- Contractors and employees will be encouraged to use public transport to minimise on-street parking impacts until the completion of a temporary car park on the site (within the basement once completed).
- Sediment and erosion control measures.

Further details on construction management and mitigation measures relating to the construction phase of the development is provided at **Appendix Q**.

8.2. SOCIAL AND ECONOMIC IMPACTS

The proposal will have a long-term positive social impact on the local community. Physical impacts generated by the proposal are more environmental rather than social or economic, and can be managed or mitigated if the recommended measures are incorporated or implemented as part of the development.

A summary of the key possible social and economic impacts associated with the development are outlined below:

- The proposal supports the provision of international education, which is one of the five main growth sectors contributing to the transition of Australia's economy from resources-based to a modern service economy. The proposal supports international education by contributing to the delivery of improved "support services, affordable and convenient accommodation and public transport".
- There is a current shortage of affordable student accommodation across Sydney and in Randwick LGA specifically, and this places significant pressure on the local private rental market, whilst creating issues with student welfare and access to accommodation that create barriers for Australian Universities to further develop in the international student market.
- Supporting the provision of a mix of boarding room typologies including smaller bedrooms coupled with increased communal amenities and facilities will reduce competition for affordable rental housing in the private market, and create safer and higher quality living environments for students. This affordable student housing will also take pressure off services and facilities in the broader community.
- The co-location of students on a site enhances a sense of community and increases social interaction for occupants.
- The proposal encourages active transport and a reduced dependence on private car ownership.
- Safety and security on the site and immediate surrounds would be improved as a result of the development and the increased activity on local streets and additional passive surveillance on an otherwise mostly vacant site.
- The proposal will generate 78 FTE direct construction and eight FTE direct operational jobs.

8.2.1. Crime Prevention Through Environmental Design

The Crime Prevention Through Environmental Design (CPTED) guidelines were prepared by the NSW Police in conjunction with the Department of Planning and Environment. CPTED provides a clear approach to crime prevention and focuses on the 'planning, design and structure of cities and neighbourhoods'.

The main aims of the policy are to:

- Limit opportunities for crime;
- Manage space to create a safe environment through common ownership and encouraging the public to become active guardians; and
- Increase the perceived risk involved in committing crime.

The guidelines provide four key principles to limit crime. These are natural surveillance, access control, territorial reinforcement and space management. An assessment of the proposed development against each of the four CPTED design principles is provided within the Table below.

Table 10 – CPTED Assessment

	Principle	Definition	Design Response
1	Natural Surveillance	Natural surveillance is a by-product of well-planned, well-designed and well-used space. It involves maximising opportunities	• Provision of adequate lighting throughout the site, including at footpaths, entrances, and basement car parking.

	Principle	Definition	Design Response
		for passers-by and users to observe what happens in an area (the 'safety in numbers' concept). Higher risk locations can also benefit from organised surveillance, which involves the introduction of formal measures such as on-site security guards or CCTV.	• Landscaping designed to reduce opportunities for concealment and maintain opportunities for passive surveillance. • Provision of CCTV at all building entrances and primary communal space. • Curtilage around the heritage listed terraces enable overlooking with no spaces behind the building for entrapment. • Design includes a variety of active frontages to Doncaster Avenue.
2	Access Control	Control of who enters an area so that unauthorised people are excluded, for instance, via physical barriers such as fences, grills etc.	• Security fencing at construction areas to present unauthorised access. • Occupants issued swipe cards for access to the building, individual rooms, and communal areas to restrict general access. • Out of hours access will be provided by security tag only to relevant staff and students. • High quality fencing to the perimeter of the site to restrict access, including importantly at the northern and eastern site boundaries. • Access control for entry and exit gates are required to use self-closing mechanisms or other control mechanisms, without restricting evacuation requirements.
3	Territorial Reinforcement	People are more likely to protect territory they feel they own and have a certain respect for the territory of others. This can be expressed through installation of fences, paving, signs, good maintenance and landscaping. Territoriality relates to the way in which a community has ownership over a space.	• All entry/exit points are to be clearly identifiable with signage and design features, and inviting. • Implement a maintenance plan, including regular rubbish and graffiti removal, repair of light fixtures and other necessary repairs. • Provision of communal open space throughout the building to provide occupants a sense of ownership for each discrete area.
4	Space Management	Ensures that space is appropriately utilised and cared for. Space management strategies include: activity coordination (i.e. having a specific plan for the way different types of activities are carried out in space), site cleanliness, rapid repair of	• On-site staff in addition with Student Assistants will manage the space to ensure it is appropriately used and card for. • The Plan of Management is to include maintenance and repairing strategies (e.g. broken windows, broken lighting, graffiti), complaint management measures, emergency procedures, waste removal procedures,

	Principle	Definition	Design Response
		vandalism and graffiti, the replacement of burned out lighting and the removal or refurbishment of decayed physical elements.	landscape maintenance, evacuation procedures, safety procedures for large events, access and monitoring measures. • Apply low maintenance and graffiti resistant materials wherever possible on surfaces susceptible to graffiti. • Entry/exists are built from resistant materials to prevent break-ins and vandalism.

9. SUITABILITY OF THE SITE

The following assessment has been structured in accordance with section 4.15C(1)(c) of the EP&A Act. The site is considered suitable for the proposed development for the following reasons:

- The proposed use is permitted in the R3 Medium Density Residential zone
- The incorporation of student housing on the site is consistent with the zone objectives of providing a variety of housing types.
- The site is located in close proximity to public transport, shops, services and employment, making it a highly desirable residential location.
- The site is well serviced by both a range of utility and social infrastructure to support the development.
- All necessary urban services are available and there are no site development hazards such as flooding, bushfire, land-slip or soil contamination.
- It is acknowledged that the site contains a local heritage item and is located within a heritage conservation area under the relevant local environmental plan. The proposed design skilfully incorporates the heritage building into the development allowing for it to be preserved.

10. THE PUBLIC INTEREST

The following assessment has been structured in accordance with section 4.15C(1)(e) of the EP&A Act. The proposal is in the public interest for the following reasons:

- The proposal has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the controls for the site ensuring the development outcome is compatible with public expectations;
- Subject to the various mitigation measures recommended by the specialist consultants as summarised in **Section 11** of this EIS, the proposal does not have any unreasonable environmental or social impacts on adjoining properties or the public domain;
- The site is well serviced by public transport and various walking and cycling routes;
- The proposal will result in the development of a high-quality residential environment for students that:
  - Provides flexible social and study environments to suit varying personal habits;
  - Supports a fulfilling and diverse extra-curricular experience;
  - Provides contemporary facilities and internal design features;
  - Provides efficient and environmentally sustainable facilities.
- The proposal has been designed to make a positive contribution to the overall built form of the site, having regard to topography and the heritage significance. The proposed built forms are sympathetic to the character of the surrounding neighbourhood and respect visual privacy of and significant views from neighbouring residential dwellings; and
- The proposal will contribute positively to energy efficiency and environmental sustainability. The design has incorporated many ESD features to reduce energy consumption during the life of the proposed development.

11. ENVIRONMENTAL RISK ASSESSMENT

11.1. RISK ASSESSMENT

The SEARs require an environmental risk analysis to identify potential environmental impacts associated with the proposal.

This analysis comprises a qualitative assessment consistent with AS/NZS ISO 31000:2009 *Risk management–Principles and guidelines* (Standards Australia 2009). The level of risk was assessed by considering the potential impacts of the proposed development prior to application of any mitigation or management measures. Comment on residual risk (the remaining level of risk following implementation of mitigation and management measures) is also provided within this section.

Risk comprises the likelihood of an event occurring and the consequences of that event. For the proposal, the following descriptors were adopted for 'likelihood' and 'consequence'.

Table 11 – Risk Descriptors

Likelihood	**Consequence**
A Almost certain	1 Widespread irreversible impact
B Likely	2 Extensive but reversible (within 2 years) impact or irreversible local impact
C Possible	3 Local, reversible (within 2 years) impact
D Unlikely	4 Local, reversible, short term (<3 months) impact
E Rare	5 Local, reversible, short term (<1 month) impact

The risk levels for likely and potential impacts were derived using the following risk matrix.

Table 12 – Risk Matrix

		LIKELIHOOD				
		A	B	C	D	E
CONSEQUENCE	1	High	High	Medium	Low	Very Low
	2	High	High	Medium	Low	Very Low
	3	Medium	Medium	Medium	Low	Very Low
	4	Low	Low	Low	Low	Very Low
	5	Very Low	Very Low	Very Low	Very Low	Very Low

The results of the environmental risk assessment of the development are presented in **Table 13** below.

We note that while this analysis has been undertaken in accordance with the SEARs, this methodology was designed principally in relation to processes impacting on natural ecological systems and is highly dependent upon 'reversibility'. In an urban context where buildings are designed to be relatively permanent, rankings are skewed upwards, and of questionable real meaning.

Table 13 – Risk Assessment

Aspect	Potential Impact	Likelihood	Consequence	Risk Level
Design Excellence, Built Form and Urban Design	Inadequate building setbacks resulting in loss of pedestrian access / amenity.	D	1	Low
	The development does not achieve design excellence.	D	2	Low
	Imposition on the streetscape.	D	2	Low
Amenity	Adverse solar overshadowing on surrounding residential properties	B	2	**High**
	Adverse impact on visual and acoustic privacy of surrounding residential properties	C	3	**Medium**
	Overshadowing of surrounding public spaces.	E	1	Very Low
	Adverse impact on reflectivity of the proposed buildings on public domain.	D	1	Low
	Adverse impact on the pedestrian wind environment of surrounding streets.	D	2	Low
	Adverse impact on the safety and security of local community	D	3	Low
Ecologically Sustainable Development	Irreversible increase in energy usage.	D	3	Low
Transport and Accessibility Impacts	Additional demand for on street car parking spaces.	D	3	Low
	Reduced access via public transport services.	D	2	Low
	Adverse impact on pedestrian access across the site.	D	3	Low
Heritage	Adverse impact on the heritage significance of the site	C	2	**Medium**
	Adverse impact on the heritage significance of the locality	C	2	**Medium**
	Damage to archaeological relics	C	2	**Medium**
Infrastructure Provision	Adverse impact on surrounding infrastructure during the construction stage of the development.	D	3	Low
Water, Drainage, Stormwater and Groundwater	Adverse impact on the quality of stormwater runoff	D	3	Low
	Adverse impact on ground water quality	D	3	Low

11.2. POTENTIAL CUMULATIVE IMPACTS

Kensington (and Kingsford) Town Centres are current subject to a Randwick Council-led Planning Proposal that has identified opportunities for density growth in the centres in order to capitalise on the light rail infrastructure investment by the government. The additional traffic and impacts on social infrastructure have been modelled in this work by Council, and consequently the draft LEP amendment incorporates a community infrastructure contribution requirement to fund the required upgrades. The analysis supporting Council's Planning Proposal assumed under-developed lands in the centre but outside the study area of the LEP amendments, such as the subject site, would be developed to their potential under the existing LEP controls.

As the proposal is a DA under the current legislative framework including existing bonuses for affordable housing controls, arguably the impacts and demands arising from the development have been anticipated in Council's Development Contribution Plan and reflect what one could reasonably expect as a physical impact outcome on the site. In addition, the cumulative impacts of the planned density change in the locality has been considered and suitable measures are proposed to be put in place to address impacts arising from increased demand on council infrastructure.

11.3. MITIGATION MEASURES

A range of mitigation measures are proposed to reduce any potential environmental and social impact of the proposal. The following table below provides a summary of environmental management measures proposed to mitigate the medium to high risks identified in the section above.

Table 14 – Mitigation Measures

Item	Potential Impact	Mitigation Measure
Streetscape	Adverse impact on the streetscape and heritage conservation area	Retention and conservation of the most significant buildings on site, and ensuring that appropriate curtilage is provided around this building so that the public can interpret the significance of the building. The materiality of the upper level of the building towards the southern portion of the site provides a transition in perception of scale to adjacent development. Articulation of the building massing and materiality to respect Victorian proportions and respond to the historic rhythm of the streetscape.
Room sizes	Non-compliance with 12sqm room sizes and potential adverse residential amenity.	Any potential affected bedrooms are supplemented by providing additional non-mandatory communal spaces. Evidence of successful precedents are provided.
Solar Access	Overshadowing impacts to 20-22 Doncaster Avenue	Compliance with the height of building control and minimum side setbacks. Upper two levels of the building at the southern façade stepped back from the ground level. Single storey built form at the south-eastern corner of the site.
Privacy	Reduced privacy to adjacent properties	Provision of window shrouds on the southern façade to orientate views away from adjacent properties

Item	Potential Impact	Mitigation Measure
Heritage	Adverse impact on the local heritage item on the site (10-12 Doncaster Avenue)	Conservation of the high significant building fabric and removal of moderate and little significant building fabric at the rear of primary building form. Minor additions are subservient to the primary building form and are not visible from Doncaster Avenue.
	Adverse impact on the heritage conservation area	Retention of 10-12 Doncaster Avenue and provision of curtilage around the item so that it can be read within the broader streetscape. Provision of sympathetic materials and building design.
Traffic and Parking	Reduced on-street parking availability	• Occupants will not be eligible for on-street parking permits through Randwick City Council; • Five car share spaces are proposed within the development; • Ample bicycle and motorcycle parking is proposed in accordance with the requirements of the ARH SEPP; and • A Green Travel Plan will be implemented for occupants.
Noise and Vibration	Adverse noise impacts on neighbouring residents	Communal facilities on the site are located away from the southern site boundary. Driveway is concealed and sleeved by built form and not adjacent to the southern site boundary.
Drainage and Flooding	Additional flooding on surrounding properties	• Perimeter fencing will incorporate a low level permeable mesh that extends from ground level to 0.5m above the 1% AEP to avoid localised pooling; • Several voids (with permeable coverings) are proposed below the ground level to allow for floodwater to be conveyed through the site, mimicking current floodwater behaviour; and • Dedicated flood transfer areas outside the building footprint (but in the site area) are proposed, which are to be kept clear from planting pods or other obstructions which could adversely impact floodwater pathways.
Construction	Adverse impacts on neighbouring properties during construction of the development	• Compliance with the conditions of consent from any DA applying to the development. • Completion of dilapidation reports of surrounding buildings, infrastructure, and roads prior to construction. • Monitoring vibration during demolition and excavation on the southern property boundary. • Compliance with a completed Construction Management Plan, and Construction Traffic and Pedestrian Management Plan. • Mitigation measures such as additional hoarding around the construction site, regulating hours for high noise activities, and localised treatment around fixed plant should noise impacts exceed the nominated levels. • Contractors and employees will be encouraged to use public transport to minimise on-street parking impacts until the

Item	Potential Impact	Mitigation Measure
		completion of a temporary car park on the site (within the basement once completed). • Sediment and erosion control measures.

Following the delivery of appropriate mitigation measures identified above and contained within this EIS, it is determined that the proposed development will not result in any adverse or on the surrounding environment with the exception potential overshadowing impacts to 20 Doncaster Avenue. This impact has been addressed at **Section 8.1** of this EIS and it is determined that the extent of impact is acceptable.

12. CONCLUSION

This EIS has been prepared in support of SSD DA SSD_9649. For the reasons outlined in this EIS, the site is suitable for the proposed development for the following reasons:

- The design positively responds to the site conditions and existing streetscape character of the locality.
- The proposal will contribute positively to energy efficiency and environmental sustainability.
- The proposal has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the controls for the site.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unreasonable impacts on adjoining properties or the public domain in terms of traffic, social and environmental impacts.
- The site is ideally suited to student accommodation and is well serviced by public transport and various walking and cycling routes. The proposal greatly encourages the use of non-private vehicle options to access the site.
- The proposed development will positively contribute to the local economy and provide a diversity of residential accommodation that suits the demographic trends of the area and the growing demand for purpose built student accommodation. The development also includes a variety of room types to accommodate varying student needs.

Given the site is suitable for the development and the proposal is in the public interest, this application should be approved.

DISCLAIMER

This report is dated 25 October 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 Bluesky Commercial Asset Management Pty Ltd (**Instructing Party**) for the purpose of EIS (**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.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

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 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SSD_8993)

APPENDIX B CIV REPORT

APPENDIX C ARCHITECTURAL PLANS AND REPORT

Refer to A3 Volume of Plans

APPENDIX D SITE SURVEY

Refer to A3 Volume of Plans

APPENDIX E LANDSCAPE PLANS

Refer to A3 Volume of Plans

APPENDIX F CIVIL DESIGN AND STORMWATER MANAGEMENT REPORT

APPENDIX G CLAUSE 4.6 VARIATION REQUEST – FSR

APPENDIX H HERITAGE IMPACT STATEMENT

APPENDIX I HISTORIC ARCHAEOLOGICAL ASSESSMENT

APPENDIX J ABORIGINAL ARCHAEOLOGICAL ASSESSMENT

APPENDIX K HERITAGE INTERPRETATION PLAN

APPENDIX L TRAFFIC AND PARKING ASSESSMENT

APPENDIX M ARBORIST REPORT

APPENDIX N ECOLOGICAL ASSESSMENT

APPENDIX O NOISE AND VIBRATION ASSESSMENT

APPENDIX P ECOLOGICAL SUSTAINABLE DEVELOPMENT REPORT

APPENDIX Q PRELIMINARY CONSTRUCTION MANAGEMENT PLAN

APPENDIX R GEOTECHNICAL REPORT

APPENDIX S PRELIMINARY SITE INVESTIGATION REPORT

APPENDIX T ELECTROLYSIS ASSESSMENT

APPENDIX U WASTE MANAGEMENT PLAN

APPENDIX V INFRASTRUCTURE SERVICES

APPENDIX W BCA REPORT

APPENDIX X ACCESS ASSESSMENT

APPENDIX Y FIRE ENGINEERING ASSESSMENT

APPENDIX Z FLOOD IMPACT REPORT

APPENDIX AA PRE-LODGEMENT CONSULTATION OUTCOMES REPORT

APPENDIX BB OPERATIONAL MANAGEMENT PLAN

APPENDIX CC UNSW LETTER OF SUPPORT

APPENDIX DD BASIX ASSESSMENT

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

URBIS.COM.AU