



Australia's property industry

Creating for Generations

Property Council of Australia

ABN 13 00847 4422

Level 1, 11 Barrack Street
Sydney NSW 2000

T. +61 2 9033 1900

E. nsw@propertycouncil.com.au

propertycouncil.com.au

[@propertycouncil](https://twitter.com/propertycouncil)

11 September 2020

Ms Therese Manns
General Manager
Randwick City Council
30 Frances Street
RANDWICK NSW 2031

Email – council@randwick.nsw.gov.au

Dear Ms Manns

Kensington and Kingsford Town Centres Draft DCP

The Property Council welcomes the opportunity to provide Randwick Council with comments on the draft development control plan (DCP) for Kensington and Kingsford Town Centres.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the following comments for Council regarding the draft DCP.

We understand that the DCP, when adopted, will support the amendments made to *Randwick Local Environmental Plan 2012* on 14 August 2020, including the requirements for design excellence and development contributions towards affordable housing and community infrastructure.

In September 2019, we wrote to Council supporting its intention to review the planning controls for the Kensington and Kingsford town centres, reflecting the improved accessibility of these areas the light rail service now delivers. A concern at the time was the need for proposed building heights and densities to be commercially viable and we understand Council has relied upon advice provided by HillPDA to understand this issue.

The draft DCP prioritises design excellence, realisation of greater density and provides for the much-needed revitalisation of Anzac Parade. However, we are concerned parts of the DCP are very prescriptive and may constrain the development potential of sites.

Specific examples of these concerns are provided below:-

- Maximum building heights in the DCP must support the building heights within LEP and not impede achievement of LEP maximum building heights.
- Laneways & Shared Way Zones. The draft DCP should be improved to better explain the obligations for landowners with respect to land needed for this infrastructure and how it will be managed.
- Part C of the DCP requires development to conform to a housing mix determined by Council. There must be greater flexibility provided in this section for developments to meet the housing needs of future residents and owners.

PROSPERITY | JOBS | STRONG COMMUNITIES

- Floor to ceiling heights are set out in the National Construction Code and the NSW Apartment Design Guide. Council's DCP should not be prescribing a minimum floor to ceiling height.
- Carparking requirements within the DCP should encourage the take up of public transport and a mode shift towards use of alternative transport such as walking, cycling and transit.
- Landscaping requirements within the DCP must be both practical and feasible. They should be applied reasonably and generally align with SEPP 65 and the Apartment Design Guide advice.
- Acoustic Privacy & Natural Ventilation sections of the DCP should align with SEPP 65 and the ADG and any requirements above those should be removed from the DCP.
- Sustainability. For residential development, the DCP cannot impose standards beyond those found in BASIX SEPP. Other requirements can only be applied to non-residential development types.
- Student Accommodation. Council will be aware the Department of Planning, Industry and Environment has exhibited an EIE to prepare a Housing Diversity SEPP that has proposed a new definition for "purpose-built student housing". The Draft DCP should take note of the EIE and its implications on the draft DCP.
- Public Art. The requirement for developments on private land to provide public art is not supported. Given the COVID-19 induced recession, the obligation for public art to be installed in development is currently unreasonable. This obligation should be delayed until the economic situation in NSW improves.
- Affordable Housing. The requirement for all contributions under the LEP affordable housing scheme to be made by dedication of land is not supported. Affordable housing contributions should be allowed to be made either through a monetary contribution to Council or the dedication of land.

Should you have any questions regarding the content of this submission, please contact Troy Loveday, NSW Policy Manager, on 0414 265 152 or tloveday@propertycouncil.com.au

Yours sincerely



Belinda Ngo
Acting NSW Executive Director
Property Council of Australia