D01459417

2 April 2012

The General Manager
Randwick City Council
30 Frances Street
Randwick NSW 2031

By Email: LEPreview@randwick.nsw.gov.au

SUBMISSION ON DRAFT COMPREHENSIVE LEP

PROPOSED RE-ZONING OF EURIMBLA AVENUE RANDWICK

This is a joint submission from the registered proprietors of no. 14 and no. 16 Eurimbla Avenue Randwick, which are attached properties.

We have considered the Council's draft LEP. We note that the draft LEP proposes to rezone part of Eurimbla Avenue Randwick and Botany Street Randwick to R3 Medium Density Residential.

As the draft currently stands, all properties to the northern side of ours (being numbers 2, 4, 6, 8, 10 and 12 Eurimbla Avenue) are proposed to be re-zoned from Low Density, to R3 Medium Density.

Our properties are not included in the proposed re-zoning.

In our submission, Council should extend the re-zoning of Eurimbla Avenue as well as Botany Street to include at least the properties located at:-

- 13, 15, 17 and 19 Eurimbla Avenue. The latter three properties are owned by the Sydney Children's Hospital Foundation; and
- 14 and 16 Eurimbla Avenue (opposite the above properties, and being our properties); and
- 61, 63 and 65 Botany Street (behind the above properties).

In fact, we do not object to the re-zoning of Eurimbla Avenue in its entirety. By extension, we do not object to the re-zoning of those parts of Botany Street backing the Eurimbla Avenue properties.

It is our submission that such an extension is:-

(a) necessary in order to achieve Council's long term aims for the Specialised Centre;

(b) opportune in circumstances where a majority of residents do not object (and in fact, significantly positioned 'blocks' of residents and stakeholders expressly consent to their properties being re-zoned); and

(c) appropriate in an area which already has a high proportion of buildings with specialised health, education and/or research uses.

We address each of the above three points under separate headings below.

The extension of the re-zoning is necessary

We have read the Council's Specialised Centre Discussion Paper. We understand and agree with what Council is hoping to achieve for the area in the long term. Eurimbla Avenue and Botany Street are key locations between the University and the Hospital and are ripe for the type of development that would facilitate a harmonious link between and, to a certain extent, integration of, the two centres.

The extent of the re-zoning that Council has proposed in its draft LEP does not go far enough towards the above aim.

Once required setbacks (both from Botany Street and High Street) are taken into account, it would seem there is little parcel left to develop in the way key stakeholders may wish and Council may require - eg: with appropriate landscaping, open space areas and parking.

In circumstances where Council's current draft proposes Medium Density development immediately adjacent to Low Density, Council will have to put in place very strict controls to ensure that residents (like us) are not detrimentally affected by 15m high buildings next door. We imagine such controls would include gradual declines in building heights as they near boundaries with Low Density, as well as requirements in relation to light and floor space ratios. This is a further reason why more land should be opened up for development. The greater the number of lots available for development, the greater the chance developers/stakeholders will be comfortable with and able to comply with these types of controls.

Any type of site amalgamation will of course occur slowly and ad-hoc. However, it will be even slower if Council's own approach remains ad-hoc. Council can act now to encourage faster and more comprehensive development by opening up the potential for more blocks to be developed.

Even if only the above listed properties were added to the proposed Medium Density zone, this alone would open up a further significant block for development, bearing in mind these properties are either adjacent to each other or directly opposite.

The potential for mid-block connection through site link and public open space has been recognised in Council's Discussion Paper. Council should be taking steps now to ensure that such potential can be realised. By restricting most of Botany Street and Eurimbla Avenue (the link between the University and the Hospital) to Low Density development, Council is losing the opportunity for such connections to be fully utilised.

The extension of the re-zoning is opportune

We are aware that the Sydney Children's Hospital Foundation is making a submission in support of the extension of the re-zoning to include their three adjacent properties in Eurimbla Avenue.

If the Foundation's properties are to be re-zoned, then it is logical, consistent and aesthetically desirable that the properties opposite be included in the same zone.

We oppose any re-zoning of the Foundation's properties that does not also include our properties. To re-zone the Foundation's properties and not those opposite would create a 'dog-leg' effect, which is not conducive to long term development and, perhaps more importantly, would have a significant detrimental impact on existing residential amenity, particularly for our properties, which would be

both next to and opposite Medium Density development whilst themselves remaining in a Low-Density zone.

Council should take this opportunity now, whilst it has the support and express consent of residents and stakeholders, to extend the re-zoning.

We are aware that our neighbours to the rear at no. 61 Botany Street fully support the extension of the re-zoning as set out above. We believe they are making a submission to the Council confirming our mutual position.

We are informed and believe that no. 63 Botany Street is owned by the University of New South Wales. We have no hesitation in the assumption that the University would support the extension of the re-zoning.

We are informed and believe that no. 65 Botany Street is owned by an investor. We have no hesitation in the assumption that that investor would support the extension of the re-zoning.

We are aware that no. 20 Eurimbla Avenue is owned by the University. We have no hesitation in the assumption that the University would support the extension of the re-zoning.

The extension of the re-zoning is appropriate

Council's Discussion Paper accurately sets out the many and varied uses of properties in this area. Whilst it is true that parts of the area are 'fine grain residential', a number of residential premises take the form of

(a) medical consulting rooms;

(b) places for research, teaching, learning; or

(c) simply provide investment opportunities for owners and stakeholders.

A number of properties in Eurimbla Avenue and Botany Street are owned by the Hospital or the University, and are used for any of the above purposes. Both the Hospital and University take an active interest in properties which enter the market for sale.

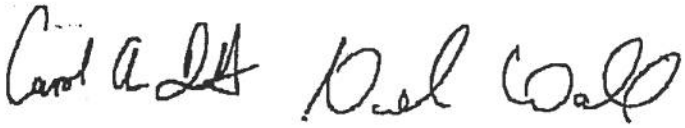
In our submission, it is simply a 'matter of time' before the majority of properties in the area are owned by investors and stakeholders using the properties for any of the above purposes.

In our submission, the extension of the re-zoning, as set out above, is appropriate for this area, at this time.

Yours faithfully,



Scott Andrew O'Brien
Registered Proprietor
14 Eurimbla Avenue Randwick



Carol Ann Duffy & Noel Wall
Registered Proprietors
16 Eurimbla Avenue Randwick

D01411985

Joanna Hole

From: objectifyFrom@randwick.nsw.gov.au
Sent: Wednesday, 11 January 2012 9:04 PM
To: General Manager
Subject: Objectify Form Email: Feedback

Submitted with the Feedback form	
Item Name	**Item Value**
First Name	Terence
Last Name	Ibbott
Email Address	terry.ibbott@bigpond.com.au
Address	6/21 Mears Av
Suburb	Randwick
PostCode	2031
Phone Number	02 9398 8175
Select a Subject	Concern
Message / Comments	Re phamphlet 'Get the Facts'I hold great concerns about lifting current 9.5m height restrictions to 15m on 'three sites only' to proposed buildings in High St & Belmore Rd.We are all aware what the lifting of such restriction in Maroubra & Kingsford has caused to visual & enviromental aspects in these suburbs & once such resatristions are lifted in Randwick there will be no end to what present & future Councils will endorse.eg Multi story building in Bligh Place.
ms__id318_0	Send

This email was generated by an Objectify CMS form.

D01459396

JBA planning

11501
2 April 2012

Mr Ray Brownlee
General Manager
Randwick City Council
30 Frances Street
RANDWICK NSW 2031

Attention: Karen Armstrong

Dear Mr Brownlee

DRAFT RANDWICK LOCAL ENVIRONMENTAL PLAN 2012
NIDA, 215 ANZAC PARADE, RANDWICK

We write to you on behalf of the National Institute of Dramatic Art (NIDA) in relation to the *draft Randwick Local Environmental Plan 2012* (draft LEP 2012). NIDA is a centre of excellence in training for theatre, film and television. NIDA's primary role is to select and train exceptionally gifted young people at a tertiary level, preparing them for careers in theatre, film and television.

NIDA is supportive of Council's intention to update its LEP to the standard instrument template. It is also supportive of the proposed zoning of the site as SP2 Infrastructure which will allow flexibility for future development on the Site.

However NIDA requests that Council seeks an amendment to the definition of an educational establishment such that it encompasses a broader range of educational establishments, including NIDA (discussed further below). It is also requested that the maximum height limits proposed for the site be deleted and that the height limits be retained within the Development Control Plan as is currently the case.

NIDA in conjunction with UNSW is undertaking its own master planning process to determine a framework for the long-term redevelopment of the Site and would welcome the opportunity to work with Council in formulating detailed design controls for the site as part of the preparation of a new development control plan for the broader Randwick Local Government Area.

1.0 THE SITE

NIDA is located at 215 Anzac Parade, Randwick (the Site). The site has an area of 10,137m^2, is legally described as Lots 1& 2 DP775979 and is owned by the University of New South Wales.

Development on the Site comprises two key buildings. At the south of the Site is the main and newest building which contains the Parade Theatre and the Parade Studio, The Reception Room, a small film and television studio – the Reg Grundy Studio, a library, a rehearsal room and workshop area. The building presents a glass facade to the Anzac Parade frontage with an awning cantilevering over the footpath. The building is one of the more iconic buildings in the education precinct. It was design by Patrick Bingham Hall and won the 2002 Sulman prize for public architecture.

To the north of the Site, behind a row of mature trees, is the original NIDA building which contains the Parade Playhouse and Parade Space, eight rehearsal rooms, costume and props workshops, lighting and sound studios, teaching and administration space. The existing building is of brick construction and contains some central courtyard/amphitheatres which are also used as performance space. It opened in 1988.

The newer building is approximately three storeys in height whilst the older building to the north is approximately two storeys in height. The existing development on the Site has a Gross Floor Area of 18,346m2 (FSR approximately 1.8:1).

2.0 MASTERPLANNING PROCESS

NIDA is undertaking a master planning and capital works process in relation to the future expansion of its campus. NIDA has commissioned Hassell Architects to undertake a comprehensive review of the existing buildings on the site and to develop a masterplan that will provide a comprehensive guide for any future development on the site.

The above master planning process is being undertaken in consultation and partnership with the University of New South Wales and is expected to be completed in June 2012. The masterplan will identify amongst other things:

- Building envelopes;
- Pedestrian connections; and
- Staging of development.

3.0 DRAFT LEP

Under the draft LEP the following controls are proposed for the NIDA site:

- Zoning – SP2: Educational Establishment
- Height – No maximum height limit for central part of site, 24m maximum height along Anzac Parade & 12m height limit along western boundary
- Floor Space Ratio (FSR) – No maximum FSR control

NIDA requests that Council removes the proposed height limits from the draft LEP and retains such controls within the Development Control Plan (DCP), as is currently the case. As noted above NIDA in conjunction with UNSW is undertaking a built form review and is developing a masterplan for the site which will guide future development. This design process will be undertaken in a comprehensive manner, looking at both the site characteristics and constraints as well as the desired future expansion of NIDA so as to ensure that both an appropriate built form and level of development is achieved on the site. Both NIDA and UNSW are willing to work with Council so as to ensure that the main gateway into the University/Education precinct is appropriate in terms of scale and streetscape presentation. The draft height controls proposed to be imposed on the site are arbitrary, do not take into account the existing development of the site and are therefore inappropriate and it is requested that they be deleted from the draft LEP.

It is noted that the Standard Instrument Template adopts the following definition of an ` educational establishment':

*educational establishment means a building or place used for education (including teaching), **being*** [our emphasis]*:*

(a) a school, or

(b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.

As NIDA is neither a school nor an institution constituted by or under an Act it cannot be classified as an ` educational establishment' under the draft LEP or the Standard Instrument Template. This may have implications for future applications lodged by NIDA as it would become a prohibited land use and thus potentially would need to rely on existing use rights.

It is therefore requested that Council, as part of its negotiations on the draft LEP with the DPI, seek an amendment to the definition of an educational establishment such that it permits a broader range of education establishment types as per that currently permitted under the existing LEP. The key difference between the two definitions being that the existing LEP does not identify a finite list of such establishments. The current Randwick LEP definition is the following:

*educational establishment means a building or place used for education (including teaching) **and includes*** [our emphasis]*:*

(a) a school, and

(b) a tertiary institution, being a university, TAFE establishment, teachers' college or other tertiary college providing formal education which is constituted by or under an Act, and

(c) an art gallery, library or museum, not being an art gallery, library or museum in which any items on display are for sale,

whether or not accommodation for staff and students is provided and whether or not used for the purpose of gain.

4.0 DCP CONTROLS

As a supplement to the draft LEP, Council is currently preparing a draft Development Control Plan which will provide more detailed controls relating to the built form on the Site. In order to assist with this process and ensure that the final controls reflect both the aspirations of Council and NIDA it is respectfully requested that NIDA be involved in the preparation of the site specific controls. As noted above NIDA has progressed their future plans for the site considerably and we believe it would be beneficial for Council and NIDA to work together to ensure a suitable design outcome is achieved. NIDA, and their architects, would welcome the opportunity to meet with Council's planning staff to further discuss the site and the planning controls that will eventually apply.

Should you have any queries about this matter, please do not hesitate to contact me on 9409 4944 or jbuchanan@jbaplanning.com.au.

Yours faithfully



Jennie Buchanan
Principal Planner

D01457237

[redacted]

From: [redacted]
Sent: Friday, 30 March 2012 12:13 PM
To: LEPreview
Subject: draft comprehensive LEP

Regarding changes to the height restrictions for Botany/ High Sts Randwick :- 1) Does this proposed change mean buildings at the cnr of Botany/High St eg 49/51 Botany St could be built with increased height, even if 53, 57, 59 Botany do not? Can a specialized centre be built in Botany St but not in Eurimbla Ave? In other words, is it all or nothing?
2) Can the NSW Govt/ Randwick Council force existing properties to be sold in the proposed precint area?
3) Does the hospital/education precinct relate to one building or many? Does it include residential apartments?
4) How will this precint affect neighbouring properties in Botany St & Eurimbla Ave? Has the impact on the 'amenity of adjoining and neighbouring land in terms of visual bulk, loss of privacy, overshadowing and views' been considered?
5) Where would parking for a specialized centre be located?
6) If approved, would there be restrictions on DA's/ renovations on affected properties?

[redacted]

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D0145 9738

Victoria Gavan

From: [redacted]@optusnet.com.au]
Sent: Sunday, 1 April 2012 7:36 PM
To: LEPreview
Subject: draft Comprehensive LEP

Dear Sir/Madam,
I would like to be included in the re-zoning being considered in Botany Street Randwick.

As the NSW University has recently purchased 63 Botany Street next to me and the re-zoning ends at 59 Botany Street I believe that I will be disadvantaged with two possible developments/ high rise being built either side of my house. This will have a devastating effect on the value of my property and on my family's life style.

Please also be informed that the owners of the two properties directly behind me in Eurimbla Street Randwick share the same concerns and will apply to be included in the re-zoning.

I hope you take the above into consideration and extend the re-zoning to include my property.

Regards
Harry

Harry Casimatis
61 Botany Street
Randwick 2031
Mob: 0413 122 112

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PLANNING
INGENUITY

D0145949

Our Ref: 0144/11lt3 2 April 2012

The General Manager
Randwick City Council
30 Frances Street
RANDWICK NSW 2031

Attn: Karen Armstrong Manager – Strategic Planning

Dear Karen,

RE: DRAFT COMPREHENSIVE LOCAL ENVIRONMENTAL PLAN
SUBMISSION IN RESPECT OF 149-155 BELMORE ROAD, RANDWICK

We refer to the above Draft Comprehensive Local Environmental Plan (LEP) for the City of Randwick that is currently on public exhibition. We act on behalf of YVR Pty Ltd & Mr Raymond & Mrs Linda Tockar, the owners of 153 & 155 Belmore Road, Randwick respectively. Whilst we act on behalf of the owners of the above-mentioned properties, our clients have maintained contact on this matter with the past and current owners of the neighbouring properties at 149 and 151 Belmore Road. These owners have expressed support in redeveloping their properties if an appropriate rezoning occurs. We believe that all these properties are ripe for redevelopment and the comments that we make in respect of the Council's Draft LEP apply equally to all these properties.

We have been instructed to review the Draft LEP in the light of the current planning controls applicable to the site, and to assess the likely impact of the proposals on our clients' properties. In undertaking this project, we have reviewed the relevant existing planning controls, the previous *Randwick Education and Health Specialised Centre Discussion Paper,* the previous *Residential Discussion Paper* and the Council's current Draft LEP. We have also inspected the subject site and the surrounding area. In light of our review, we make the following submission on the behalf of our clients.

You will recall that the previous *Randwick Education and Health Specialised Centre Discussion Paper* identified the subject properties as being part of the Specialised Centre, included recommendations that Council consider options to facilitate intensification of health/medical uses and also to encourage increased residential development, in the form of mixed-use developments, to provide housing opportunities for key workers and students in the specialised centre.

The report also recommended that Council consider increased density of development in this location and retain a flexible approach in order to respond to the unpredictable nature of growth in support services for the health and education sectors. These could include specific provisions to encourage redevelopment of ground floor and first floor levels for health, medical and related support uses (for example cafés and chemist shops).

We note that the Draft LEP proposes that the subject properties be included within the *R3 Medium Density Residential Zone* and that it proposes a maximum building height of 15m. No specific FSR control applies to the site, no doubt due to Council's intention to specify building envelope controls in a Development Control Plan (DCP).

On behalf of our clients, we write to support the proposed zoning under the draft LEP, noting that it provides the flexibility to achieve mixed development in accordance with the intentions of the previous Discussion Papers. In terms of the permitted height of development, it is apparent that the previous *Randwick Education and Health Specialised Centre Discussion Paper* clearly identified the subject sites as appropriate for buildings significantly in excess of the normal height proposed for the *R3 Medium Density Residential Zone*. Whilst the Draft LEP proposes a maximum height of 15m, it is our opinion that the particular context of our clients' sites is such that they could readily accommodate an even greater height of development than that identified in the Draft LEP.

We note that Part B of the *Randwick Education and Health Specialised Centre Discussion Paper* states at page 16, inter alia:

> *" The East End contains the Centre's eastern gateway, and bridges Randwick Junction, the Spot and the Randwick Health Campus. This area will evolve into a more integrated, vibrant location for health-related services and the dining, shopping and commercial needs of the Centre's workforce and community"*

In our view, the subject sites, being the Eastern Gateway of the Specialised Centre, justifies and indeed requires a strong streetscape presentation to celebrate the importance of this location. Similarly, the need to "improve the links between the Health Campus, Randwick Junction and the Spot" as indicated on the same page as the above quote, also warrants appropriately scaled street-wall buildings and uses to encourage an active and pedestrian friendly street frontage.

The sites' location facing High Cross Reserve, which contains very tall Norfolk Island Pines, together with the Hospital and other buildings of substantial scale across from the Reserve also supports justification for buildings of a similar scale. Additionally, our clients' properties being bounded by roads to the north and south, means that privacy and overshadowing impacts are insignificant and easily managed.

The subject sites immediately adjoin the Randwick Town Centre and the Randwick Education and Health Specialised Centre. Indeed, they are recognized as the eastern gateway to the centre and provide an important role in supporting the centre and providing a transition to residential areas further to the east. They enjoy excellent access to numerous bus services that link Randwick with surrounding suburbs, the Eastern Beaches and the Sydney CBD via frequent services 7 days a week.

Whilst we acknowledge that the subject sites are within a heritage conservation area, they do not contain any identified heritage items. There is a heritage item to the north on the corner of Avoca Street and Mears Avenue that would need to be considered in any future redevelopment. However, the heritage provisions contained in the Draft LEP will ensure that due consideration is given to the conservation area and to nearby heritage items in the design and assessment of any future development proposal on the subject land. Given the heritage items location to the north of the site it is not considered that this item would impose any significant constraints on future redevelopment of the subject land.

The age and modest scale of existing development on the subject properties, together with the fact that all 4 buildings are not the homes of any of the owners indicates that redevelopment is possible - indeed highly probable given the willing owners – providing the planning controls provide sufficient incentive.

In summary, we support the zoning proposed under Council's Draft LEP but consider there is scope to permit buildings on this site with a height in excess of 15m without any adverse impact on the locality. In our opinion development to 18m in height could be readily accommodate on the site in order to encourage and facilitate the type of development envisaged by Council in the previous *Randwick Education and Health Specialised Centre Discussion Paper.*

Similarly, we support the absence of FSR controls for the site in the draft LEP and would encourage Council in the formulation of envelope controls in the foreshadowed draft DCP to allow flexibility in any controls so as to recognise the specific opportunities of this site.

We thank Council for the opportunity to review and make submissions on the Draft LEP and would welcome the opportunity to meet with Council officers to expand and elaborate upon our submission if that would be of assistance to them in their consideration of this matter or the foreshadowed draft DCP. If so, please do not hesitate to contact our office.

Yours faithfully,
Planning Ingenuity Pty Ltd

L. Fletcher.

Lindsay Fletcher
MANAGING DIRECTOR

D0145933/

Submission by Sydney Children's Hospital Foundation in Response to DRAFT Randwick LEP 2012

Monday, 2 April 2012

Executive Summary

The Sydney Children's Hospital Foundation (SCHF) is the principal fundraising body for Sydney Children's Hospital, Randwick.

The SCHF owns properties at 15, 17 and 19 Eurimbla Avenue Randwick.

The properties at 17 and 19 Eurimbla Avenue Randwick are used as the SCHF primary place of business and the SCHF staff and volunteers are accommodated within these properties.

Over time, as the SCHF operations expanded, the number of staff and volunteers accommodated at Eurimbla Avenue properties has been increasing and existing accommodation is sub optimal. The SCHF projects further expansion of its activities in the coming period and the SCHF owned properties at Eurimbla Avenue are not sufficient to accommodate expanded activities in their current form.

In late 2011, the SCHF commenced investigations of available options for providing accommodation at Eurimbla Avenue in medium to long term. In the course of the investigation, through consultation with the Randwick Council, the SCHF became aware of the Draft Randwick LEP 2012 under which properties along High Street would be rezoned from R2 – Low Density Residential Zone to R3 – Medium Density Residential Zone.

The proposed area of rezoning stops short of the SCHF properties at Eurimbla Avenue.

The purpose of this submission is to put forward an argument for extending the proposed rezoning further into Eurimbla Avenue to include the SCHF properties at 15, 17 and 19 Eurimbla Avenue.

This submission does not deal in detail with technical aspects of the proposed rezoning. It is anticipated that technical details of the rezoning will be resolved in the course of the adoption of the Draft LEP.

At this stage, the SCHF is proposing that its properties be rezoned along other properties in Eurimbla Avenue already proposed to be rezoned under Draft Randwick LEP 2012, from R2 – Low Density Residential Zone to R3 – Medium Density Residential Zone.

Draft Randwick LEP 2012

The Draft Randwick LEP 2012 proposes rezoning properties along Eurimbla Avenue from intersection with High Street up to, and including, properties at 11 Eurimbla Avenue and 12 Eurimbla Avenue.

Proposed area of rezoning relative to the SCHF properties is shown below.



Proposed rezoning relative to SCHF properties

Current Use of Properties Owned by SCHF

Currently the SCHF uses properties at 17 and 19 Eurimbla Avenue as office accommodation for its staff and volunteers.

Over time, as the SCHF operations expanded, the number of staff and volunteers accommodated at Eurimbla Avenue properties has been increasing and up to 30 staff and volunteers occupy the offices concurrently. The properties at 17 and 19 Eurimbla Avenue are residential houses converted into office space and as such provide suboptimal accommodation for the SCHF operations.

The SCHF projects further expansion of its activities in the coming period and the SCHF owned properties at Eurimbla Avenue are not capable of accommodating expanded activities in their current form.

The location of the properties is ideal for the SCHF operations as it is directly abutting Sydney Children's Hospital. The interaction between the Foundation and the Hospital largely occurs via Hospital Road.

Eurimbla Avenue access into the SCHF premises is largely used by visitors, for deliveries, and staff arriving to work.

The property at 15 Eurimbla Avenue is currently used as a residence and is leased out.



SCHF properties relationship to Sydney Children's Hospital

The SCHF is in the process of exploring options for improving accommodation available at 15, 17 and 19 Eurimbla Avenue that could resolve the SCHF accommodation needs in medium to long term.

Proposed Modification to Draft Randwick LEP 2012

The SCHF proposes that that the area of rezoning proposed under the Draft Randwick LEP 2012 be extended to include the SCHF properties on Eurimbla Avenue – up to and including 19 Eurimbla Avenue.

The arguments for extending the area of rezoning are as follows:

- The potential redevelopment of the properties owned by the SCHF would result in the use complementary to the activities of the adjoining Sydney Children's Hospital and broadly consistent with the Health and Medical Related Uses suggested in the Randwick Education and Health Specialized Centre discussion paper prepared by Randwick Council.

- Properties at 15, 17 and 19 Eurimbla Avenue are owned by the SCHF and as such represent one of the largest continuous blocks of properties under single ownership on either side of High Street between UNSW and Sydney Children's Hospital. In the area of highly fragmented land ownership these properties represent the best opportunity for consolidation and redevelopment in the short to medium term. The property at 13 Eurimbla Avenue (not owned by the SCHF) could potentially be included into consolidation and redevelopment.

- Properties at 17 and 19 Eurimbla Avenue are currently used as office accommodation for the SCHF staff and volunteers. The revised zoning of these properties would enable development of the purpose designed accommodation for the SCHF with appropriate physical interaction with the Sydney Children's Hospital.

- The development of a purpose designed facility would create opportunity for improvement of amenity for SCHF neighbours by allowing better interaction between SCHF and the hospital via Hospital Road.

- The current use of the properties at 17 and 19 Eurimbla Avenue is consistent with the R3 – medium density residential zoning and rezoning of these properties would not result in change of use.



Proposed expansion of rezoned area indicated in Draft Randwick LEP 2012

Discussions with Neighbours

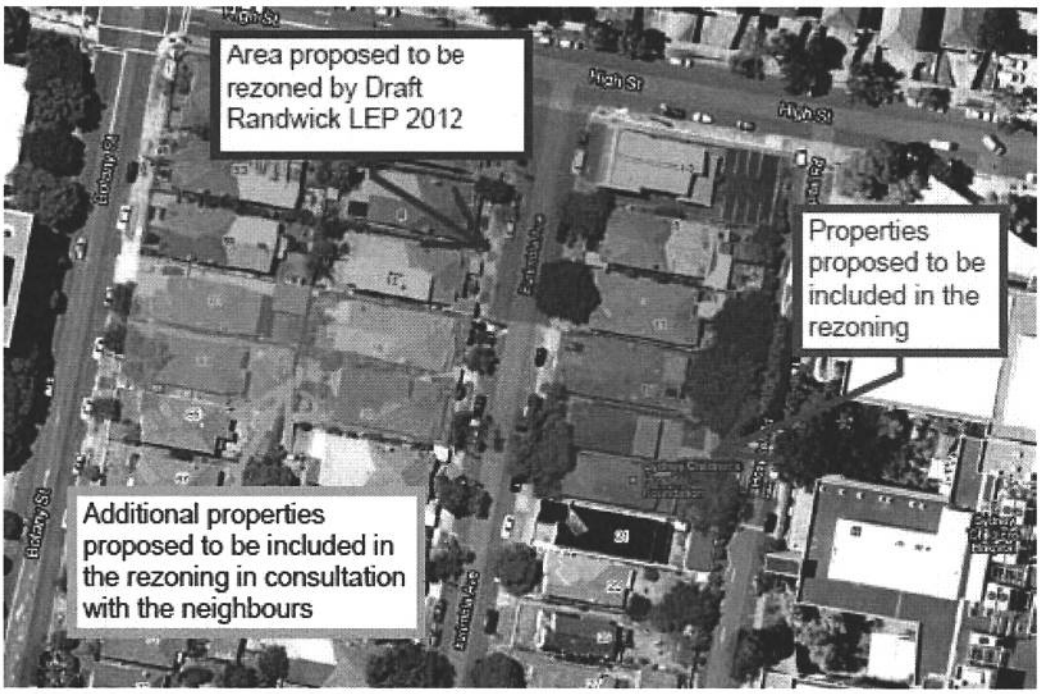
The SCHF engaged in a limited consultation with neighbours in Eurimbla Avenue and Botany Street. The following neighbours were consulted:

- 14 Eurimbla Avenue
- 16 Eurimbla Avenue
- 61 Botany Street

The neighbours consulted expressed support for extending the rezoning up to and including 19 Eurimbla Avenue.

Furthermore, the owners of the abovementioned properties expressed the desire for the rezoned area to include properties bounded by 65 Botany Street, 20 Eurimbla Avenue and 19 Eurimbla Avenue at one end and High Street at the other.

The SCHF would support extended rezoning as indicated below.



Proposed expansion of rezoned area supported by SCHF

DO 1459332

UNSW Submission to Randwick Draft LEP 2012

The following comments are made with respect to clauses in the draft LEP.

Height of Buildings – Clauses 4.3, 4.3A and 4.3B

UNSW is of the view that the designation of building height within the SP2 Infrastructure zone should remain within the applicable DCP and not be designated in the LEP.

The Height of Buildings Map 002 (see comments below) proposes to designate maximum building heights on the perimeter of the Kensington campus (and the Randwick Hospitals campus) without reference to an appropriate clause in the LEP document. There is for example, no explanation of why certain town centres are referred to in clauses 4.3A and 4.3B, but no mention is made of the height of buildings within either campus or what the objectives of a limitation to the building height on the campus perimeter are.

The comprehensive planning and development of the Randwick Education and Health Specialised Centre is viewed by UNSW as more critical to the long term economic future of Randwick than any individual town centre, and so the omission of relevant building height clauses appears to be an oversight.

Furthermore, there is no explanation of how the perimeter area was determined for example, in the same way that the clause in Schedule 2 Exempt Development on page 57 of the LEP explains that the 'outer area' is 60 metres wide.

Exempt and Complying Development – Part 3 and Schedule 2

An additional Note 3 is suggested to Schedule 2 Exempt Development on page 55 of the LEP with respect to exempt development for UNSW.

The SEPP (Infrastructure) 2007 states that development for a purpose specified in Schedule 1 of that SEPP is exempt development if it is carried out by or on behalf of a public authority. UNSW is a public authority and as such may carry out a range of exempt development not specified in Schedule 2 of the LEP.

Ancillary Development/Buildings

UNSW has previously made submissions to Council and the Department of Planning and Infrastructure on the definition of ancillary uses/development relevant to an educational establishment such as a university.

Ancillary development is referred to in the LEP under Zone SP2 Infrastructure, Permitted with Consent on page 19. Ancillary buildings are referred to in Schedule 2 on page 58. Both terms apply to UNSW but neither is defined in the LEP.

It is noted that a university is not specifically defined in NSW planning legislation. It is also the view of UNSW that 'educational establishment' is too narrow a term to describe the wide range of non-teaching/research activities that are carried out within modern university campuses.

UNSW can foresee some difficulties in interpretation without a clear understanding of what may constitute ancillary development or buildings in the LEP. It is therefore suggested that the following definition of university (based on the Department's Infrastructure SEPP Discussion Paper of March 2010) be included in the LEP.

> *"University means a building or place with facilities used for providing high level university standard education for degrees and academic research, for encouraging the dissemination, advancement, development and application of knowledge across a range of fields, and the carrying out of research to advance knowledge and inquiry, and includes (but is not limited to) the following ancillary facilities:*
>
> *a) Facilities for educational purposes;*
> *b) Facilities for research purposes (whether or not it is carried out by university staff or students or for commercial purposes);*
> *c) Accommodation for students, staff and visitors;*
> *d) Facilities for administration and offices;*
> *e) Facilities for cultural, sporting, professional, technical and vocational services;*
> *f) Shop, restaurant or café to provide for staff and students;*
> *g) Child care centre for the children of staff and students;*
> h) *Parking for staff, students and visitors."*

The following comments are made with respect to the Maps accompanying the draft LEP.

Heritage Maps 001, 002 and 007

These three maps indicate proposed heritage items and conservation areas within the University campuses at Randwick, Kensington and Coogee respectively.

There is an inconsistency between the maps in identifying heritage items and heritage conservation areas and also in the listing of those items in Schedule 5 of the LEP.

Heritage Map 001 - Randwick Campus

This indicates a car parking area i.e. Lot B DP 441177 as a heritage item (see attached UNSW Property Details Plan). It was previously a house and has never been part of the old tram workshops. The car park has no heritage significance and its designation is an apparent error. UNSW requests that it be removed from the map and Schedule 5 amended accordingly.

The map also indicates Building R2 on the campus as a heritage item. This building was truncated and its eastern end demolished in 1966 to fit into the new UNSW site as part of subdivision of the old Randwick Tramway Workshops. Since then the building has been extensively remodelled with the walls, windows and roof cladding replaced, skylights removed, and internally refitted with a suspended ceiling and partitioned with concrete block walls. Considering this, UNSW sees no value in designating the current structure as a heritage item.

The University therefore requests that it be removed from the map and Schedule 5 amended accordingly.

The items in Schedule 5 appear to have been repeated and the inclusion of Lot 3 in DP 2123542 in the Schedule is in error.

This leaves the Old Tramshed (Building R9) on Lot 1 DP 228903 and Lot 1 DP 787868 remaining as the heritage item, to which UNSW is not opposed.

Heritage Map 002 – Kensington Campus

This indicates a Heritage Conservation Area within the Kensington campus, generally referred to as the Old Tote Courtyard. It includes the Old Tote building, the White House, the Figtree Theatre and a number of Moreton Bay fig trees.

The area designated within the draft LEP is different to that in the existing LEP, does not take into account recent adjoining redevelopment and is unclear in exactly what constitutes the Area.

It is unworkable for part of a new building (i.e. the UNSW Village) to be included in a Heritage Conservation Area, which is what the proposed designation is suggesting.

Attached is a proposed re-definition of the Heritage Conservation Area on the Kensington campus which includes all of the current listed items but excludes adjacent buildings.

Heritage Map 007 – Coogee Campus

This indicates the whole upper portion of the campus as a heritage item, as opposed to individual buildings as indicated on Map 001 for the Randwick campus.

UNSW objects to this designation on the grounds that it does not properly reflect the listing in the State Heritage Register and includes buildings constructed in the 1950's and 60's with no heritage value i.e. Buildings CC2 and CC4 (see attached UNSW Property Details Plan). Neither is it consistent with the designation of individual buildings on the Randwick campus.

The State Heritage Register makes an assessment of significance for the Cliffbrook i.e. Building CC1. As for Building CC3 the Register has this to say: *"the building has no features of architectural, aesthetic or technical distinction. It has been modified many times in an ad hoc manner".*

UNSW has no objection to Cliffbrook (Building CC1) being indicated as a heritage item on Map 007 – this is compatible with the State Heritage Register, but objects to the other buildings and the whole upper campus being so designated and requests that the map and Schedule 5 be amended accordingly.

Key Sites Maps 001 and 002

UNSW has no objection in principle to the inclusion of key sites in the LEP and the requirement under clause 6.11 to develop such land under a site specific Development Control Plan. However, there appears to be some inconsistencies in designating key sites on these maps.

Key Sites Map 001 – Randwick Campus

Lot B DP 441177, one of five lots that constitute the Randwick campus is not included in this map. UNSW requests that this lot be included so that the campus can be planned and developed comprehensively under a DCP.

Key Sites Map 002 – Kensington Campus and Environs

The area bounded by Arthur Street, Botany Street, High Street and Wansey Road is indicated as a key site. This area is generally referred to by the University as the **'Arthur Street block'**. The University owns the majority of land within this area and is continuing to purchase the remaining lots as they become available for sale.

The university is pursuing the same acquisition strategy to the area bounded by Botany Street, High Street, the Randwick Hospitals campus and Magill Street. This area is generally referred to by the University as the **'Eurimbla Avenue block'**.

The Eurimbla Avenue block is considered by UNSW to be a key site in that it is strategically located between its Kensington campus and the Randwick Hospitals campus and, as indicated in Council's Precinct Plan, it is also a transition area. It will undergo change as land acquisitions by the University continue.

It would seem appropriate therefore, that this area is comprehensively planned and developed to ensure built form, open space and circulation within the area responds to that of the two adjacent campuses and helps to achieve the key vision of growing the Randwick Education and Health Specialised Centre as a place of national significance.

It is difficult to imagine a more important future development site in the Randwick Education and Health Specialised Centre than this area between the two key economic drivers of the Centre. It is therefore viewed as a fundamental omission from the LEP that the area is not designated as a key site and subject to the preparation of a DCP under the provisions of clause 6.11.

UNSW therefore requests that the Eurimbla Avenue block be designated as a key site as shown on the attached map.

Height of Buildings Map 002 – Kensington Campus and Environs

Kensington Campus

UNSW is of the view that the designation of building height within the SP2 Infrastructure zone should remain within the applicable DCP and not be designated in the LEP.

As discussed earlier above, there is no explanation by way of appropriate clauses in the LEP of the objectives or width of the proposed perimeter height zone. Neither is there consistency with the current DCP e.g. in Willis Street and for Building L5 on Anzac Parade, both of which are currently 24 metres. UNSW objects to the arbitrary imposition of a new height maximum height that contravenes the current DCP.

In any event, the University has previously submitted that the designation of a maximum building height of 24 metres is arbitrary. It pays no regard to the particularities of the campus topography or to overshadowing or other amenity considerations at the ground plane where buildings could be designed with these considerations in mind, independent of an arbitrary height limit.

The University is unclear what the maximum perimeter height in the LEP is trying to achieve that building height and setback controls in the site-specific DCP cannot achieve in a more effective way. It therefore requests that these maximum building heights for the campus perimeter be deleted from the Height of Buildings Map 002.

Arthur Street Block

Under the draft LEP it is proposed to rezone this area to R3 Medium Density Residential with a designation as J2 i.e. a maximum building height of 9.5 metres.

It is noted that within Council's Precinct Plan (pages 60 and 61), the Arthur Street block is part of a larger designation as a transition area and mixed use precinct along High Street. These are strategies to create a planning framework for the long term growth needs in education and research.

It is also noted that in Council's Consultation Summary for the Specialised Centre (page 23) the Arthur Street block is identified as blue hatched area 'A' where growth is to be concentrated along the High Street spine of the Centre.

Consistent with these Precinct Plan strategies and to facilitate its development for education, health, research and student housing, it is understood that Council originally proposed the Arthur Street block to have a maximum building height of 15 metres with 24 metres for those lots fronting High Street. UNSW supports this as a longer-term strategy when UNSW has acquired sufficient additional lots to enable the comprehensive planning and development of the whole block for university related purposes.

In the interim, UNSW supports the 9.5 metre maximum height under the LEP within the area's designation as a key site.

Eurimbla Avenue Block

Under the draft LEP it is proposed to rezone 17 lots at the High Street end to R3 Medium Density Residential with the remainder of this area rezoned to R2 low density residential. Consistent with this proposed rezoning is the designation of the same 17 lots as O1 i.e. a maximum building height of 15 metres with the remainder of the block as 9.5 metres.

Council's strategy is consistent with the strategies in its Precinct Plan to facilitate development along High Street for education, health, research and student housing. However, as argued above, the Eurimbla Avenue block should be designated as a key site; this being fundamental to achieving good planning and development outcomes for this area, rather than just focussing on building heights for those lots at the northern end close to High Street.

Good outcomes can best be achieved through the amalgamation of lots and the comprehensive planning for the whole block by way of a DCP. Neither of these strategies could be properly

addressed under the two maximum building heights proposed for this area in the LEP. The absence of the area's designation as a key site only compounds the issue.

As with the Arthur Street block, UNSW supports a higher maximum building height for the Eurimbla Avenue block compatible with its strategic location, but only as a longer-term strategy.

Therefore in the interim, UNSW does not support the partial designation of the block for a 15 metre maximum height, but requests instead that the whole of the Eurimbla Avenue block be retained with 9.5 metre height together with the area's designation as a key site as argued earlier above.

The university would be pleased to arrange a meeting with Council officers to clarify the matters raised in the above submission.

Sincerely,

Anne Warren per

Peter McGeorge

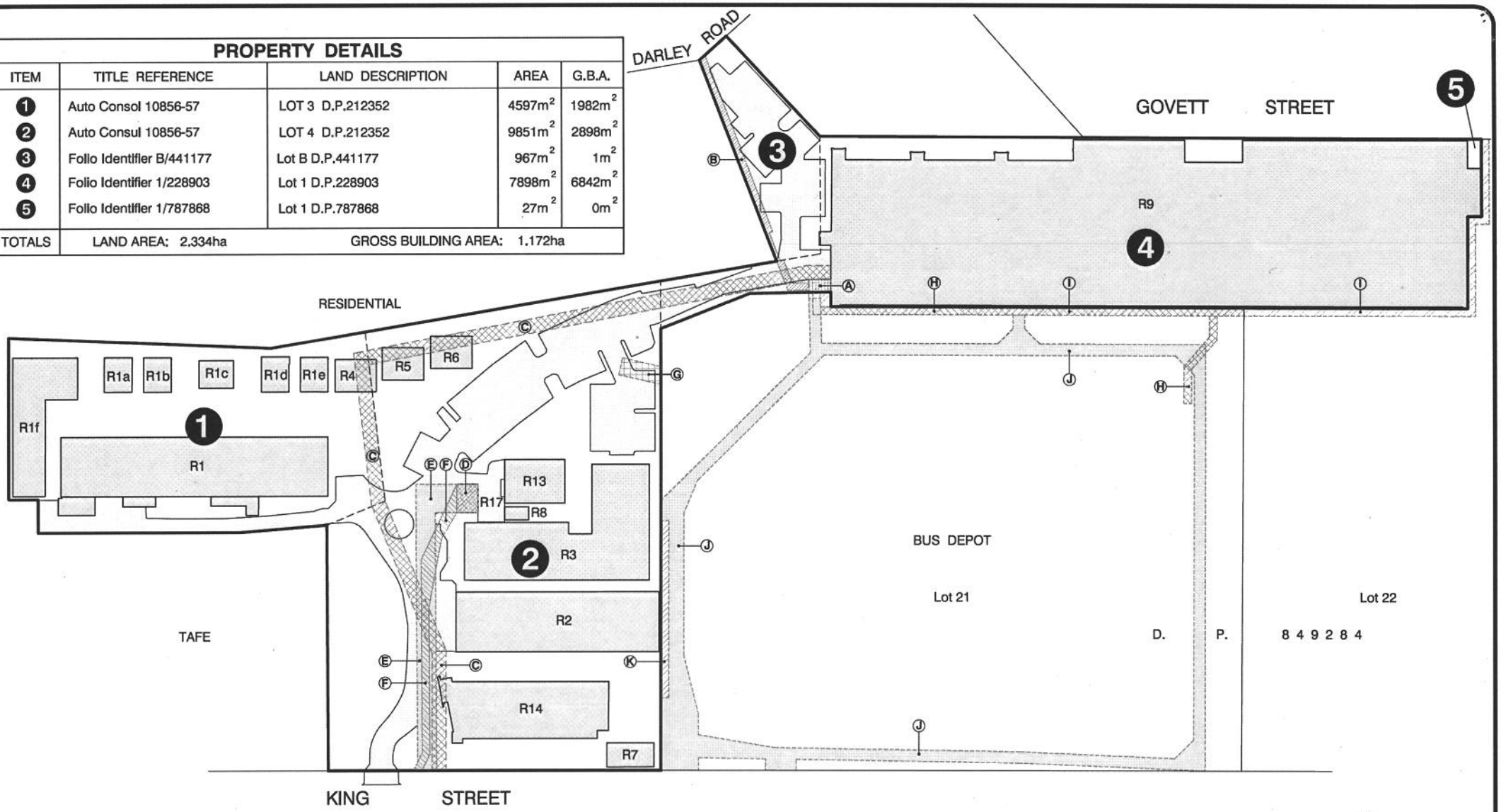
Acting Director, Facilities Management

Attachments:

Randwick Property Details Plan
Kensington Campus Heritage Conservation Area
Cliffbrook Property Details Plan
Eurimbla Avenue Block Key Site

PROPERTY DETAILS

ITEM	TITLE REFERENCE	LAND DESCRIPTION	AREA	G.B.A.
1	Auto Consol 10856-57	LOT 3 D.P.212352	4597m^2	1982m^2
2	Auto Consul 10856-57	LOT 4 D.P.212352	9851m^2	2898m^2
3	Folio Identifier B/441177	Lot B D.P.441177	967m^2	1m^2
4	Folio Identifier 1/228903	Lot 1 D.P.228903	7898m^2	6842m^2
5	Folio Identifier 1/787868	Lot 1 D.P.787868	27m^2	0m^2
TOTALS	LAND AREA: 2.334ha	GROSS BUILDING AREA: 1.172ha		



ENCUMBRANCE SCHEDULE

ITEM	TITLE/DESCRIPTION	REFERENCE
Ⓐ	Lease of Sub Station premises No.2309	Y207342
Ⓑ	Right of Way	
Ⓒ	Easement for Electricity Purposes	
Ⓓ	Lease of Sub Station premises No.6958	I227338
Ⓔ	Right of Way	
Ⓕ	Easement for Electricity Purposes	
Ⓖ	Easement to Drain Water 4.5 Wide	D.P.849284
Ⓗ	Easement to Drain Water 2 Wide (Appurtenant)	
Ⓘ	Easement for Support 2 Wide (Appurtenant)	
Ⓙ	Easement for Access 3 Wide & Variable (Appurtenant)	
Ⓚ	Easement for Maintenance 1.5 wide (Appurtenant)	

THE UNIVERSITY OF NEW SOUTH WALES
FACILITIES MANAGEMENT

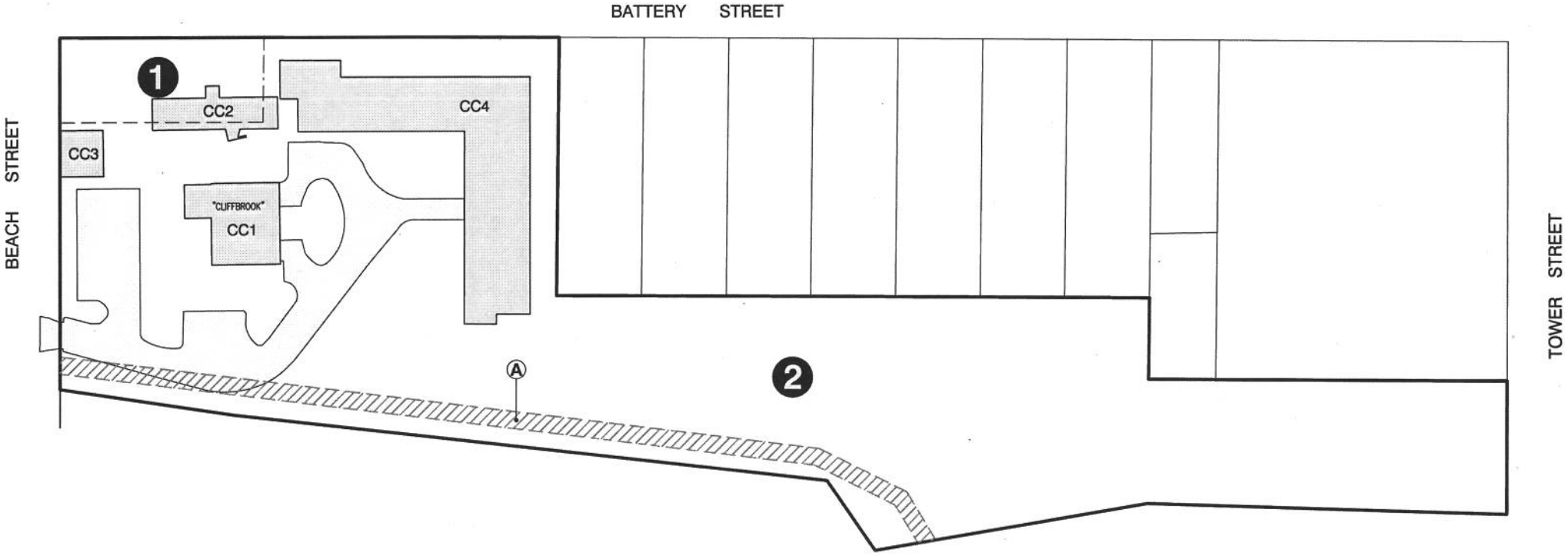
Section: INFORMATION SERVICES

Created	Last Modified
13/04/2000	24 May 2005
Drawn: UNSW	Approved: G.JESSIMAN
Discipline: ARCHITECTURAL	Scale: 1:1000 @ A3
CAD Reference: I:\Randwick-Site	

Campus: RANDWICK — Campus No: RANC
Location: KING STREET, RANDWICK
Title: PROPERTY DETAILS PLAN — Sheet No: 1 OF 1
Drawing No: RANDWICK — Revision: 005



Kensington Campus – Heritage Conservation Area



PROPERTY DETAILS

ITEM	TITLE REFERENCE	LAND DESCRIPTION	AREA	G.B.A.
1	Auto Consol 6681-186	LOT 1 D.P.8162	556.4m^2	93.6m^2
2	Auto Consol 6681-186	LOT 1 D.P.109530	1.098ha	1174m^2
TOTALS	LAND AREA: 1.153ha		GROSS BUILDING AREA:	1267m^2

ENCUMBRANCE SCHEDULE

ITEM	TITLE/DESCRIPTION	REFERENCE
A	Easement for Drainage 3.05 Wide	M806316

SCALE
0 10 20 30 40 50
Metres

N

THE UNIVERSITY OF NEW SOUTH WALES
FACILITIES MANAGEMENT

Section: INFORMATION SERVICES

Created	Last Modified	Campus	Campus No:
11/4/2000	14/3/2005	CLIFFBROOK	CLIF
Drawn: UNSW	Approved: G.JESSIMAN	Location: BEACH STREET, COOGEE	
Discipline: ARCHITECTURAL	Scale: 1:750 @ A3	Title: PROPERTY DETAILS PLAN	Sheet No: 1 OF 1
CAD Reference: I:\....Cliffbrook–Site		Drawing No: CLIFFBROOK	Revision: 002



Eurimbla Avenue Block – Key Site

D01458234

[redacted]

From: [redacted]
Sent: Monday, 2 April 2012 11:07 AM
To: Karen Armstrong
Subject: Proposed Rezoning to include my property - [redacted]

Hello Karen

Thank you for your time this morning.

As discussed, I have no objection to the proposed rezoning, except to note that the area should be developed in a comprehensive way as identified in the LEP. ie, 49, 51, 53, 55, 57 and 59 Botany Street through to 2, 4, 6, 8, 10 and 12 Eurimbla Avenue - all the blocks in one lot, not broken up.

My neighbours [redacted] have requested I include their names in this submission as being supportive of the development as detailed above.

With current building works and ongoing development on Botany Street by UNSW, I believe other properties in Botany Street going south should be given the opportunity to be included in the rezoning.

Regards
[redacted]

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