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URBIS

LITTLE BAY COVE

Supplementary Planning
Statement

Prepared for
MERITON
March 2020

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CONTENTS

1.	Introduction	4
2.	Strategic Merit	6
2.1.	Consistency with Local Strategic Plans	7
2.1.1.	Randwick Local Strategic Planning Statement	7
2.1.2.	Randwick Housing Strategy	9
3.	Alternative Masterplan.....	12
3.1.	Overview	13
3.1.1.	Key Numerics	13
3.1.2.	Design Principles.....	13
3.1.3.	Site Layout and Urban Form	13
3.1.4.	Open Space.....	14
3.1.5.	Access Structure	14
3.1.6.	Residential Amenity.....	15
3.2.	Impact Assessment.....	15
3.3.	Response to Feedback	16
3.3.1.	Transport for NSW.....	16
3.3.2.	Heritage Council.....	17
3.3.3.	Randwick City Council.....	17
4.	Conclusion.....	21
5.	Disclaimer	22

FIGURES

Figure 1	Long term (10 + year) housing growth	10
Figure 2	Alternative Concept Plan prepared by PTW	12
Figure 3	Massing of Urban Form.....	14
Figure 4	View from Little Bay Beach	16

TABLES

Table 1	Estimated Developable Areas	13
Table 2	Response to Council Feedback.....	17

1. INTRODUCTION

This report has been prepared by Urbis Pty Ltd on behalf of Meriton (**the Proponent**) in support of a Planning Proposal to amend the *Randwick Local Environmental Plan 2012 (RLEP 2012)*. This relates to land forming part of 12.3-hectare landholding at Anzac Parade, Little Bay (later to be known as Little Bay Cove) which is located within the Randwick Local Government Area (**LGA**).

This report is a Supplementary Planning Statement and has been prepared in support of a Planning Proposal submitted to Randwick City Council (**Council**) in September 2019 (RZ/4/2019). Due to evolution in the strategic planning framework and infrastructure decisions by the NSW Government since the lodgement of the Planning Proposal, this report has been prepared to primarily provide a supplementary assessment and justification of the strategic merits of the proposal in response to Council, agency and community feedback.

In undertaking a review of the strategic merit of the proposal, the Guidelines and the Act, including relevant Directions outlining the requirements of a Planning Proposal have been revisited. Specifically, section 3.33 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)* and the NSW Department of Planning, Industry and Environment's (**DPIE**) "A guide to preparing Planning Proposals" guideline has been reviewed to ensure the proposal appropriately satisfies the pre-Gateway phase.

It is important to note that the DPIE guide contains the following with regards to how much information should be in a planning proposal before a Gateway determination is issued. Critically the focus is on strategic merit which is a mandatory test. This does NOT apply to site specific considerations which inevitably are resolved post Gateway. That is not to say that site specific considerations are not ignored, rather the Guideline states that they must be "identified" not "satisfied", suggesting further assessment post Gateway and informed by among other matters Government Agency consultation, which itself only occurs formally post-Gateway.

*A planning proposal **must demonstrate the strategic merit** of the proposed LEP amendment.*

*A planning proposal which is submitted for a Gateway determination must provide **enough information to determine whether there is merit in the proposed amendment proceeding** to the next stage of the plan making process. The level of detail required in a planning proposal should be proportionate to the complexity of the proposed amendment.*

*A planning proposal relates only to a LEP amendment. It is not a development application **nor does it consider specific detailed matters that should form part of a development application.***

*The planning proposal should contain **enough information to identify relevant environmental, social, economic and other site-specific considerations.** The **scope** for investigating any **key issues should be identified** in the initial planning proposal that is submitted for a Gateway determination. This would include **listing what additional studies the PPA considers necessary to justify the suitability of the proposed LEP amendment.** The actual **information/investigation may be undertaken after a Gateway determination** has been issued and if required by the Gateway determination.*

(Note: 'bold' added for emphasis)

To provide further guidance and direction to both Council and the DPIE of the potential future development of the site in line with the Planning Proposal objectives, masterplan(s) have been prepared which provides indicative approaches to how the intended outcomes of the Planning Proposal could be achieved. This includes the masterplan prepared by SJB Architects and submitted within the September Planning Proposal, and an alternative masterplan prepared by PTW Architects (**PTW**) and submitted for consideration as part of this Supplementary Planning Statement.

The PTW scheme seeks to address feedback obtained from Council, the community and preliminary government agency feedback and illustrates an alternative design response for the site. This option has comprehensively evaluated the site conditions, context, connectivity and views, along with the amenity of surrounding properties and puts forward a different urban design proposition to the SJB scheme. It is intended that this masterplan will sit supplementary to the initial masterplan prepared by SJB Architects and represents an alternative approach to facilitating the intended outcomes of the Planning Proposal. Critically, these two alternate masterplans confirm the opportunity to further resolve the final density and built form controls post Gateway as part of the site-specific merit assessment and taking on board the views of all stakeholders.

This report should be read in conjunction with the Planning Proposal prepared by Urbis and appended reports which was originally lodged in September 2019, and the submission to Randwick City Council on the draft Randwick Local Strategic Planning Statement and Housing Strategy in October 2019. In addition to this, the following documentation has been provided to support the Planning Proposal:

- Alternative Masterplan prepared by PTW
- Addendum Transport Report prepared by TTPP
- Addendum Heritage Archaeology Statement prepared by Extent
- Addendum Heritage Impact Statement prepared by Urbis
- Memorandum of Understanding between Sydney Water Corporation and Meriton

Accordingly, this statement and all associated documentation reaffirms the Planning Proposal's consistency with the prevailing policies and demonstrates that the Planning Proposal meets relevant statutory and non-statutory requirements to proceed to, and through, the Gateway process. Specifically, the Planning Proposal:

1. Is consistent with the relevant State and Regional Plans.
2. Is consistent with the Local Strategic Planning Statement and Housing Strategy.
3. Is located on one of the most strategically significant areas in Greater Sydney.
4. Identifies and provides adequate analysis to address key site-specific issues as the Planning Proposal progresses.

This Planning report provides Randwick City Council with sufficient information and additional certainty of the strategic merit of the Planning Proposal, in order to allow the referral of the application to the NSW DPIE seeking a Gateway determination.

2. STRATEGIC MERIT

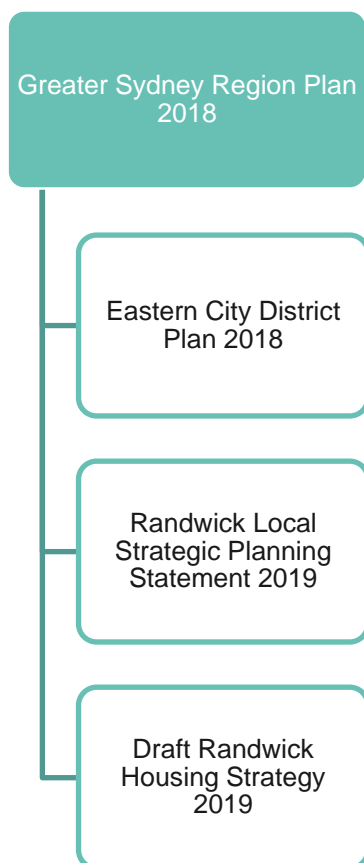
A Guide to Preparing Planning Proposals outlines that a Planning Proposal **must** demonstrate the **strategic merit** of the proposed LEP amendment. In accordance with section 3.33 of the EP&A Act, in order to demonstrate strategic merit, a proposal must give effect to the relevant Regional, District and local strategic planning statement, including any draft plans released for comment.

The Planning Proposal submitted in September 2019 assessed the proposal's compliance with the applicable Greater Sydney Region Plan and Eastern District Plan. The Report demonstrated a high level of compliance with these strategies through the ability of the site to give effect to the directions and priorities of the strategies.

Following the lodgement of the Planning Proposal, in October 2019 Randwick City Council formally exhibited their draft Vision 2040 documents including *draft Local Strategic Planning Statement (LSPS)* and *draft Housing Strategy*. These documents were formally endorsed by Council on 25 February 2020, and it is understood these are currently with the Greater Sydney Commission (GSC) for assurance. The submission prepared in October 2019 verified the Planning Proposal's consistency with the LSPS and draft Housing Strategy which was reflected by the Planning Proposal being acknowledged in the documentation and Council addressing that the LSPS and draft Housing Strategy was a flexible document that did not prevent the Planning Proposal from proceeding should the Planning Proposal meet the directions and priorities of the document, as outlined below.

In accordance with Division 3.1 of the EP&A Act, these documents will form part of the strategic planning framework and play an important role in informing local statutory plans and development controls, as outlined below. The LSPS is further a statutory consideration for the assessment of Planning Proposals and must be addressed in the strategic justification of the proposal.

This section therefore complements the original assessment of the Greater Sydney Region Plan and Eastern District Plan provided in the September Planning Proposal with an assessment of the proposal against the Randwick LSPS and Housing Strategy.



2.1. CONSISTENCY WITH LOCAL STRATEGIC PLANS

2.1.1. Randwick Local Strategic Planning Statement

The Randwick LSPS provides the basis for strategic planning in the area, having regard to economic, social and environmental matters. An assessment of the consistency of the Planning Proposal with the Randwick LSPS is provided in the following subsections.

In summary, the assessment finds the proposal is consistent with, and will enable the achievement of, the directions and priorities of the LSPS.

Recognition of site in Randwick Structure Plan

The LSPS Structure Plan identifies areas for 0-10-year housing growth. The identification of Little Bay Cove as a 'Major Site Housing Growth (0-10 year)' confirms Council's recognition of the strategic role the site will play contributing to Council's housing needs. This is further reinforced by the adjoining Land and Housing site with the same characteristics and location also being identified.

Further, it is noted the Planning Proposal is consistent with the identification of a 'recreation and tourist hub' in the southern coastal area near Port Botany/ La Perouse. The capacity for a hotel offering on the site will support the growth of this tourist hub and the diversification of the southern trade gateways.

Consistency with Planning Directions

An assessment of the proposal against the ten key planning directions of the LSPS is undertaken below.

Liveability

The Proposal is consistent with the Liveability priorities of the LSPS (Priority 1 – Priority 7) as follows:

- Little Bay Cove is highly capable of contributing to the dwelling targets for the LGA. As discussed in **Section 2.1.2**, the site has the capacity to contribute to the delivery of these targets. Meriton's proposal also contributes to housing choice and diversity that will assist in combating affordability issues as discussed in the LSPS.
- The proposal responds to both the existing and desired future character of the area. This is achieved through a retention of the existing residential land uses for the site, consistent with current zoning and land use character. The opportunity to increase density in a sustainable manner confirms an ability to align with the future demographic and land use character of the Randwick LGA, and the area's excellent proximity to jobs, services and transport.

As outlined in the heritage statements prepared by Urbis Heritage and Extent, the Planning Proposal will provide for a reasonable and appropriate development of the site which will have no detrimental impact on the significance of the broader Prince Henry Hospital Heritage Conservation Area and vicinity heritage items. This is further demonstrated through the retention of the potential Aboriginal ochre in the centre of the site, with the retention of public access in perpetuity to allow for appreciation and celebration of the item.

- The Planning Proposal will improve social infrastructure in Little Bay through the provision of an open space contribution, improved access to retail and other services for the local area with a local retail centre, improved recreational and active transport links, a financial contribution toward infrastructure upgrades and delivery of a child care centre. In addition, the Section 7.11 Contributions generated by the proposal will be significant to support the funding of new and existing infrastructure in the LGA beyond that already expected. Broad estimates are approximately \$6 million.
- These positive benefits for both the immediate Little Bay community and the broader Randwick LGA are not available through alternative supply mechanisms, and Meriton's commitment to delivering these benefits represents a holistic approach to development that extends beyond the site-specific extents.

Productivity

The Proposal is consistent with the Productivity priorities of the LSPS (Priority 8 – Priority 13) as follows:

- The LSPS supports the concentration and integration of land uses together with efficient transport provision, as it delivers significant benefits and supports the idea of a 30-minute city.

- The Planning Proposal is highly consistent with this objective, as the proposed LEP amendments will enable the delivery of a new mixed-use neighbourhood centre with a range of land uses such as residential, retail, tourist and visitor accommodation, medical centres, recreation facility (indoor) and a potential child care centre. This concentration of land uses will allow residents to live locally with a reduced reliance on public transport and reduced need to travel long distances to other centres of basic needs. The site's direct interface with Anzac Parade as a strategic transport corridor will similarly provide access to the existing and wider public transport network.
- The Proposal will unlock the ability for workers and residents to access key strategic centres and employment hubs such as the port, airport, hospital, and CBD within 30 minutes. Housing key workers within inner-city areas will also reduce time spent travelling to employment opportunities and improve accessibility.
- The Proposal is consistent with Council's initiatives to increase tourism in the LGA. The site has the potential to accommodate a hotel to support the development of a visitor economy in the region, building on the region's natural coastal assets. This will contribute to the development of the tourism industry in the region and generate additional local spending in the economy.

Sustainability

The Proposal is consistent with the Sustainability priorities of the LSPS (Priority 14 – Priority 19) as follows:

- The LSPS identifies that growth in the LGA's population will put pressure on the existing open space and recreational assets. Council therefore encourages planning for and retaining open space and recreation facilities, with an emphasis on the Green Grid.
- The Proposal achieves this priority through the delivery of over 10,000sqm of public open space on the site, and the delivery of an integrated network of green open space, bicycle paths and parks. This has been informed by an open space needs analysis to ensure an appropriate quantum of open space is delivered to relieve pressure on existing assets. This is also complemented by a financial contribution toward provision of new district park/sports field within the precinct site.
- The Proposal retains the existing central portion of ecological land which runs along a north-south axis, following the natural drainage courses towards Little Bay. The protection of this central area responds to existing site topography and will enable the natural funnelling of stormwater to retention basins for reuse and recycling.
- Similarly, the Proposal retains the remnant stand of Eastern Suburbs Banksia Scrub (ESBS) and the established buffer areas located on the eastern most edge of the property. The ESBS is a critically endangered ecological community and has been incorporated into the masterplan for the site, ensuring that important environmental assets are protected.
- Meriton has signed a Memorandum of Understanding with Sydney Water for recycled water servicing of the site under the proposed increased density. The understanding seeks to ensure the site is appropriately serviced with relevant infrastructure and recycled water to accommodate the increase in development capacity. Broad servicing options for the site include servicing of the site locally through a decentralised sewer mining scheme, or via linear infrastructure with treatment assets at Sydney Water Corporation's site, or a combination of the two. While these are site-specific considerations that will be resolved during the future Development Application(s) phase, this memorandum demonstrates an alignment with the strategic principles of ensuring sites are adequately serviced in a sustainable manner.

It is further noted the appropriate servicing of the site and incorporation of ecological sustainable measures was raised as a primary concern of community comments across a wide range of platforms, demonstrating Meriton's commitment to responding to, and resolving community issues.

- While the ecological sustainability of development on the site is largely a site-specific consideration and will be addressed as part of future development applications, the redevelopment of the site at a precinct-wide scale will provide the opportunity to deliver an efficient and sustainable precinct within proximity of the site to transport corridors and local, strategic and metropolitan centres. This will ultimately slow emissions growth and contribute to a low-carbon city, aligning with the LSPS Sustainability priorities.

Infrastructure

The Proposal is consistent with the Infrastructure priorities of the LSPS (Priority 20 – Priority 22) as follows:

- The site is appropriately zoned and serviced to support urban development. The augmentation of these services (as appropriate) will be a function of the resolution of site-specific merit considerations post Gateway.

The Proposal is highly consistent with the planning priorities of the Randwick LSPS, as well as the actions that guide locations for future housing growth identified in the Housing Strategy.

When concurrently read with the Planning Proposal submitted in September 2019, it is clear the Proposal is consistent with and gives effect to Regional, District and local planning policies.

These two documents provide assurance that the Planning Proposal demonstrates strategic merit and should proceed to the next stage of the plan making process, during which further investigation will be undertaken, particularly focussing on site specific merit considerations.

2.1.2. Randwick Housing Strategy

The preparation of local housing strategies is a requirement of the Regional and District Plans. The strategy is to identify where 0-5-year, 6-10 year and 20-year housing targets are most appropriately located in a local government area to align with existing and planned transport infrastructure.

Housing Growth – Alignment with Urban Structure

The Randwick Housing Strategy identifies eight priorities to guide change in planning policy and controls over the next 20 years. These priorities will provide for approximately 14,600 new dwellings to accommodate 13,500 households in Randwick City Council by 2036. This capacity is only 8% greater than the need which is far from sufficient as there are many factors that will constrain delivery (finance, willingness, capacity, market, lot consolidation etc) that does not affect Meriton.

It is acknowledged that the existing 2009 Master Plan approval for the site is identified as contributing to the 6-10-year housing targets. This cap on provision of dwellings on the site and the timeframe within which to do so represents a significant risk to the achievement of the overall 20-year dwelling target. Where the site has the potential to contribute dwellings more than currently planned for, in an area that currently falls short of required dwellings, Council should optimise and enable the opportunity.

In regard to the long-term dwelling targets, the land use planning approach to deliver dwellings include:

- Bilga Crescent Land and Housing Corporation lands (directly adjoins the site to the north).
- Coral Sea and Soldiers Settlement Land and Housing Corporation lands and surrounds.
- ‘Hill 60’ Local Aboriginal Land Council lands.
- East of the Matraville Town Centre.
- Eastgardens-Maroubra Junction Strategic Centre.

The above sites are all generally located proximate to the “Anzac Parade Corridor”. Little Bay Cove falls comfortably within this Corridor bearing similar characteristics insofar as scale, location and development capacity is concerned

This is illustrated in the long-term housing map extract provided at Figure 1 overleaf.

Figure 1 Long term (10 + year) housing growth



Source: Urbis, Randwick City Council

Strategic Land Use Opportunities – Consistency with Locational Criteria

The Randwick Housing Strategy identifies land use planning criteria to identify land use opportunities for focussing growth. These criteria were used to calculate the housing capacity analysis, which provided the evidence base for the identification of future dwelling growth.

Little Bay Cove is consistent with Council's criterion for growth as follows

- **Proximity to strategic, town and neighbourhood centres**

The site is strategically located on a major transport corridor that connects to/provides ready access to several key strategic centres, trade gateways and education and health precincts including, but not limited to, Port Botany (1km), Sydney Airport (10.2 km), Randwick (8.8 km), Eastgardens – Maroubra Junction (6.4 km), Bondi Junction (11.7 km), Green Square- Mascot (12.3 km), Sydney CBD (15.9 km). As a consequence of location on Anzac parade, the benefits from access to these centres by public transport via local bus services. These services also provide links to the Sydney CBD, key Strategic Centres as well as regional transport modes including the future Kingsford Light Rail Station (7.8 km), Mascot Train Station (10.6 km) and Green Square Train Station (12.3 km).

The Planning Proposal will provide a local neighbourhood centre including a supermarket that will support the development and surrounding area which lacks a well-planned high- quality convenience based local centre.

▪ **Availability of services and facilities**

An audit of social infrastructure surrounding the site confirms that it is well-serviced by infrastructure and thus capable of supporting the additional demand envisaged by the Planning Proposal. The site benefits from its proximity to a network of social infrastructure including schools, community venues, libraries and recreation centres.

Currently, the nearest commercial and retail uses are located at the local and strategic centres nearby, the distance of which requires travel by car or public transport. However, the Planning Proposal aims to create a vibrant mixed-use precinct comprising approximately 5,900sqm of retail floor space which will service the needs of the local community, whilst retaining the key commercial role of district and strategic centres of Eastgardens and Bondi Junction. Additional services such as a potential childcare centre, medical centre and recreation facility (indoor) will provide the required local services to allow residents to live locally, reduce reliance on transport and age in place. The convenience of these amenities will also extend to the surrounding residential area, who will be able to take advantage of these services.

▪ **Availability of existing or planned key infrastructure**

The site is well serviced by existing transport infrastructure. Anzac Parade services a high frequency of buses which service the surrounding suburbs, the Randwick Health and Education precinct and the Moore Park entertainment precinct, whilst Bunnerong Road provides services to Eastgardens, Kensington and Central Station. The site is located approximately 10km south-east of Mascot Station, and 6.9km south of the Kingsford Light Rail Station, providing both heavy rail and light rail connections.

Furthermore, there are several planned public transport projects anticipated in the relevant Strategic planning framework that will benefit the site and the broader south east. These include:

- *Sydney Metro City & South West (committed 0 -10 years).*
- *Green Square to La Perouse Rapid Bus Link (investigation 0 - 10-years).*
- *Light Rail Extension to Maroubra Junction (investigation 10 - 20-years).*
- *Mass transit / train link to South East (investigation 10 - 20-years).*
- *Extension of South East mass transit to Miranda (visionary 20+ years).*
- *City serving transport corridor from Bondi Junction to La Perouse.*

While the Housing Strategy identifies that the approach to meet the longer term (10+ year) housing need is dependent on future transport commitments identified in the District Plan, the Planning Proposal for the site has demonstrated that the proposal is not reliant on the delivery of any of these longer term initiatives. Further discussion of this is provided in the Traffic and Transport Response prepared by TTPP. The Response indicates that although the site is not dependent on transport upgrades, a contribution to the upgrades required for the surrounding area could be negotiated through the Voluntary Planning Agreement (VPA) process. Accordingly, the Planning Proposal can be the catalyst for future transport which will assist the Council in achieving the expected redevelopment of other sites.

▪ **Proximity to recreational assets, open space and areas of high amenity**

Existing areas of public open space are provided in walking distance of the site. The proposal seeks to further enhance open space provision. This consistency demonstrates the appropriateness of the site to deliver the feasible level of development required to meet housing targets.

3. ALTERNATIVE MASTERPLAN

An Alternative Master Plan has been prepared by PTW to identify the permitted built form massing on the site envisaged in accordance with the proposed LEP amendments. The alternative Masterplan has been developed following a peer review of the SJB scheme, identification of key issues and ongoing consultation with Council.

It is acknowledged that site-specific issues such as density, built form integration, traffic and overshadowing are not primary considerations during the pre-Gateway assessment. The proponent is willing work collaboratively with Council to ensure the best built form outcome on the site once strategic merit has been confirmed.

The PTW scheme continues to envisage the site within both its current, immediate and long-term future context. However, the scheme places less emphasis on the redevelopment of surrounding land parcels and seeks to respond to the diversity of urban form surrounding the site, specifically the high-density corridor along Anzac Parade and the low-density form of the coastal area. The indicative masterplan as prepared by PTW is illustrated in **Figure 2**, with further discussion contained in the following subsections.

Figure 2 Alternative Concept Plan prepared by PTW



Source: PTW

3.1. OVERVIEW

3.1.1. Key Numerics

An overview of the key numerics of the Alternative Masterplan prepared by PTW is provided in **Table 1**. In summary, the developable area will include a compact and organised built form interspersed with areas of open space. This will achieve an appropriate balance between built and natural elements in response to the local character of the area.

Table 1 Estimated Developable Areas

Numeric	Alternative Masterplan
Subject Site (excluding community title lot)	98,143sqm
Open Space	33,286sqm
Road/ Infrastructure	31,486sqm
Developable Lot Area	58,431sqm
Gross Floor Area/ FSR	196,150sqm / 2:1

3.1.2. Design Principles

To inform the preparation of the alternative Masterplan for the site, PTW developed a number of urban design principles. These principles aim to support the overall objectives of the Planning Proposal as identified in Section 1, and include:

- Create two residential neighbourhoods separated by the riparian zone: Anzac Parade neighbourhood and a Coastal Neighbourhood.
- Reinforce the urban character of the Anzac Parade neighbourhood through street aligned built form.
- Integrate mid-rise mixed-use buildings and encourage active street frontages within the Anzac Parade neighbourhood.
- Taller heights in Anzac Parade neighbourhood and along the edges of the riparian zone.
- Create a less urban character within the Coastal neighbourhood through low-rise built form and a mixture of housing types integrated with soft landscape.
- Distribute public open spaces so that passive surveillance and permeable connections are maintained.
- Ensure each street has built form setbacks to allow solar access. Ensure each street is permeable and has a human scale with the setbacks of new built form that allows solar access and WSUD.
- Establish building setback controls, provide for the creation of wider footpaths and soft landscape treatment integrated with WSUD.
- Provide a sensitive transition in relation to adjoining and well-established lower scaled residential neighbourhoods.

3.1.3. Site Layout and Urban Form

The division of the site into two urban character zones is a key element of the Alternative Masterplan. The two character zones, known as the 'East Precinct' and 'West Precinct', have separate identities and urban forms in response to the diversity of urban form surrounding the site. The central landscaped area and interlinking central pedestrian spine will create an integrated, yet uniquely diverse, urban form.

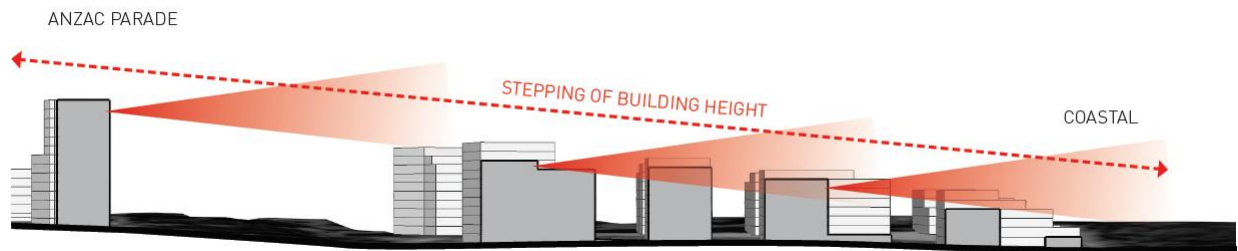
Adjacent to Anzac Parade, the West Precinct is envisaged with a more 'urbane' character that responds to the robust urban context of the surrounding Anzac Parade corridor. Taller buildings are located within the West Precinct to respond to the corridor, and to respect the natural topography of the site that slopes down towards Little Bay. Land uses within the West Precinct will consist of residential dwellings with retail centres

and urban parks, inviting public access into the precinct while safeguarding the East Precinct for more private residential dwellings.

The East Precinct is characterised by lower-density dwellings, parks and roof terraces. The precinct is designed with a feathered, soft edge interface to complement the low-density coastal environment of Little Bay. This is achieved through stepping down building block heights towards the east, and through use of a stepped, landscaped roof to blur the interface between the built form and natural environment. The design of the East Precinct includes building densities less than current planning controls, demonstrating ongoing refinement and improvement to the site planning context.

The modulation of the built form and stepped height massing in response to the site-specific sensitivities is outlined in the following **Figure 3**.

Figure 3 Massing of Urban Form



Source: PTW

3.1.4. Open Space

Areas of open space are located throughout the development in areas of high amenity to increase the usability and amenity of the spaces. The Concept Plan proposes a total of 33,286sqm of open space, comprised of:

- Public open space located in the centre of the site surrounding the dam, Miocene and Ochre deposits.
- Two separate public plazas, one in each zone.
- Communal open space located within each building block, in addition to private residential courtyards.
- These series of parks and open spaces are connected by a system of pedestrian and cycle paths, creating a highly walkable and pedestrianised precinct.

3.1.5. Access Structure

The indicative access structure is integrated with the public open space pattern described above. The Masterplan seeks to minimise the quantity of roads through encouraging traffic flow along a central corridor adjacent to the northern boundary of the site, which also allows for future integration with the LAHC site. North-south roads provide access to individual dwellings and open space areas, creating public activation.

Pedestrian activity is encouraged through a central spine link, which provides a direct connection from Anzac Parade, through the West and East Precinct, towards the coastline. As the spine moves from west to east, its character will change to reflect the varying urban zones and the range of services provided within the broader precinct.

The access structure is designed to reduce reliance on vehicles and encouraged pedestrian movement and incidental social interaction along the street network. The PTW scheme has been designed to ensure all precincts are within walking distance to shops, parks and public recreation areas.

3.1.6. Residential Amenity

The concept plan illustrates a layout and building arrangement that can be designed to comply with the relevant provisions of SEPP 65 and the associated ADG. As outlined in the Alternative Masterplan prepared by PTW, key considerations are as follows:

- Building separations meet the minimum requirements set out in the ADG (Sections 2F and 3F) to assist in achieving high levels of visual and acoustic privacy, outlook, natural ventilation and daylight access.
- The solar access analysis undertaken by PTW indicates that approximately 70% of dwellings on each lot will achieve the required 2 hours of solar access on the winter solstice based on the massing and separation of buildings.
- Building envelopes are capable of achieving 60% cross ventilation, consistent with the ADG.
- The orientation of buildings maximises solar access for future residents, whilst minimising the potential for unreasonable overshadowing to neighbouring properties, the public domain and open space.
- A range of communal open space opportunities will be available throughout the development including open spaces (i.e. central open space), the two public plazas, communal open space within each block, the retention of the existing riparian park and the incorporation of pedestrian and cycle paths.

Refer to further discussion in the Alternative Masterplan prepared by PTW.

3.2. IMPACT ASSESSMENT

The following subsections contain a preliminary appraisal of the environmental, social and economic impacts associated with the PTW Alternative Master Plan. As identified in the DPIE *Guide to Preparing a Planning Proposal*, impacts associated with the scheme are to be identified in the Planning Proposal Report, with information and further investigations to be undertaken following the Gateway Determination.

There are not likely to be any environmental impacts associated with the future development of the land that cannot be suitably mitigated through detailed design development and subsequent Development Applications on the site given the developable footprint of the site reflects the existing extent of approved residential development.

Built Form Impact

The PTW scheme puts forward an alternative built form strategy relative to the September 2019 masterplan by SJB. The scheme proposes reduced bulk and density in the Eastern Precinct to minimise visual impact on the coastal landscape adjacent. This is achieved through a feathered or soft edge interface with the existing landscape through a combination of low-density apartment buildings, townhouses and terrace housing typologies integrated with public open space. Density has been shifted to the Western Precinct which has greater capacity due to the more robust urban context of the Anzac Parade corridor, featuring higher density apartment and shop top housing buildings that are stepped in height to minimise visible scale to edge interfaces and maximise view opportunities.

The proposed overall urban form is designed to interact sensitively with the existing uses of surrounding properties. Building heights reduce at all interfaces with existing properties.

Visual Impact

A visual impact analysis has been prepared by PTW and is provided within the Alternative Masterplan. The relocation of built form within the site has resulted in improved views from surrounding sensitive viewpoints, including from Little Bay Beach and Boora Point. The proposed distribution of built form has been developed with consideration of the potential view impacts from these two sensitive coastal locations.

As outlined in **Figure 4**, the building envelopes respond to the natural topography of the site and as such sit comfortably within the natural landscape. The envelopes are largely within the range of visibility of other built forms surrounding the coastal corridor. An indicative shading of the PTW built form is provided within the figure extracts in red and illustrates the scheme relative to the SJB scheme in grey and 2009 approved masterplan in blue. From Little Bay Beach, there is a significant reduction in the visibility of the PTW building envelopes.

Figure 4 View from Little Bay Beach



Source: PTW

3.3. RESPONSE TO FEEDBACK

Prior to and following lodgement of the Planning Proposal in September 2019, Meriton has been engaging regularly with Randwick Council and state government authorities notably Transport for New South Wales (TfNSW) in relation to the proposal. The agency engagement undertaken to date will be supplemented with further agency consultation undertaken post-Gateway, guided by the consultation requirements identified within the Gateway determination.

The preliminary views of TfNSW, Heritage Council and Randwick City Council have been considered during the preparation of this Supplementary Planning Statement and are discussed as follows.

3.3.1. Transport for NSW

Preliminary feedback was received from TfNSW on the 11 November 2019, which provided in principle support for residential development at the site and the notion of introducing measures to reduce car usage to support trip containment. The feedback also provided detailed traffic and transport commentary for consideration, which has been addressed in the Addendum Transport Report prepared by TTPP. The assessment demonstrates that the specific issues are or can be addressed so that the Planning Proposal is aligned with the broad strategic principles as per the TfNSW statement, which states:

Residential development at Little Bay/Malabar is broadly aligned with Greater Sydney Commission's Eastern City District Plan and Visionary Transport Network within the Future Transport Strategy 2056.

As reiterated in the TTPP Statement, the Planning Proposal does not rely on a public commitment to provide additional mass transport infrastructure. The revision of transport calculations to the site including mode share and traffic generation undertaken by TTPP reveals that three intersections may perform poorly; upgrades would ensure they perform adequately in the future. It is further noted that these upgrades are not solely required as a result of the Little Bay Cove Planning Proposal, but due to existing traffic volumes and future traffic growth.

3.3.2. Heritage Council

Preliminary feedback was received from the Heritage Council on the 13 February 2020, which outlined they required more information to be submitted in order to adequately gauge the impacts of the proposal on the Miocene Geoheritage site and adjacent State heritage listed sites. This feedback has been addressed in the addendum Heritage Archaeology Statement prepared by Extent and Addendum Heritage Impact Statement prepared by Urbis.

In particular, the Statement from Extent identifies that the PTW scheme does not impact directly on either the agreed Miocene and Ochre Conservation Area as established in the CMP or the additional ochre deposits area identified in 2012, subject to implementation of the following recommendations at various stages of the development:

- Compliance with protocols set out in the CMP during bulk excavation, piling and other sub ground disturbance works.
- Compliance with the recommendations, policies, management requirements and statutory requirements set out in the previous advice, assessments, plans and studies.
- Continued consultation with the La Perouse Local Aboriginal Land Council.
- Compliance with the aboriginal heritage protection provisions of the National Parks and Wildlife Act 1974 at all times, including all current regulatory requirements and policy of DPIE.

3.3.3. Randwick City Council

Randwick Council issued formal feedback on the 17 January 2020 in relation to the Planning Proposal and SJB Masterplan scheme. Notably, Council’s commentary **does not raise any issues with the strategic merit of the proposal or the proposed Randwick LEP amendments, and rather identified a number of site-specific considerations to be addressed, such as density, view impact, open space and transport.**

These comments have been considered during the preparation of the PTW scheme. However, it is also recognised that this scheme will evolve and be amended post-Gateway in response to further information and investigations. A response to the way in which the PTW scheme addresses the feedback received from Council is provided in **Table 2**.

Table 2 Response to Council Feedback

Feedback	Response
<p>1. Scale and built form</p> <p>The tower configuration and heights proposed is incompatible with the sensitive coastal environment and surrounding development; and results in excessive building height and bulk as illustrated in the (revised) Visual Analysis including unacceptable impacts in terms of overshadowing.</p> <p>A revised concept scheme should consider more low to mid-rise building typologies with lower rise buildings to the south and particularly to the east.</p>	<p>The scheme by PTW proposes an alternative urban design and built form approach to that of the SJB master plan. The masterplan has been guided by the principle of creating two distinct neighbourhoods comprising the Anzac Parade neighbourhood and Coastal neighbourhood.</p> <p>The Anzac Parade neighbourhood is characterised by mid-rise mixed-use buildings with heights ranging between 2-16 storeys reflecting the zone of existing development of varying scale along Anzac Parade.</p> <p>The Coastal neighbourhood is intended to be less urban in character which is proposed to be achieved through low-rise built form between 2- 11 storeys and a mixture of housing types in a landscaped setting. A stepped built form to 2 storeys is proposed along the</p>

Feedback	Response
	<p>southern boundary to provide a sensitive transition to the established lower scaled residential neighbourhood.</p> <p>The proposed overall urban form is designed to interact sensitively with the existing uses of surrounding properties. In particular, the revised bulk and density in the eastern part of the site minimises visual impact on the coastal landscape adjacent, as illustrated in the revised visual impact analysis (refer Section 3.2 for further discussion) and reduces the visual impact to Little Bay beyond the approved scheme.</p>
<p>2. Density</p> <p>The revised scheme presents only a minor reduction to density from 2:1 to 1.75:1 and number of dwellings, i.e. 15%. It is still more than three times the density that was originally approved (by the LEC) and without any certainty of improved transport infrastructure to the site. This substantial increase in density still results in excessive building height and bulk as illustrated in the (revised) Visual Analysis, and to the surrounding coastal setting.</p>	<p>The alternative scheme by PTW achieves an FSR of 2:1 which is consistent with the FSR sought by the SJB scheme as lodged. While the scheme proposes a consistent FSR to the previous scheme, the PTW scheme proposes an alternative urban design approach which results in overall reduced building heights across the site, stepped low height transition to the sensitive interfaces of the east and south and introduction of a variety of housing typologies.</p> <p>Integral to the scheme is the reduction in the quantity of road (relative to the SJB scheme) particularly where adjacent to sensitive areas such as the riparian zone and the gold course and a careful revision of the open space pattern to ensure it is located in consolidated, high amenity areas and connected via a system of pedestrian and cycle paths.</p> <p>The alternative scheme reduces the visible scale of the site from sensitive locations, in particular from Little Bay beach.</p>
<p>3. Visual Impact</p> <p>The revised scheme still presents an impact (although reduced) on views particularly from Little Bay Beach and the coastal scenic character of the area. No buildings should exceed the already approved height particularly on the sensitive eastern edge.</p>	<p>The PTW scheme proposes reduced building heights and seeks to locate lower building heights in the eastern Coastal neighbourhood portion of the site. Building heights in the eastern side of the site range between 2- 11 storeys and step down toward eastern and southern boundaries.</p> <p>Building heights in this area as approved range between 2-5 storeys.</p> <p>A revised view analysis has been prepared comparing the alternative PTW scheme, the SJB scheme and the approved scheme from sensitive viewpoints at Little Bay Beach. From the Little Bay Beach viewpoint, there is a significant reduction in visible built form relative to the SJB scheme and a reduction in areas compared to</p>

Feedback	Response
	<p>the existing approval. The visible envelopes of the scheme are generally within the range of visibility of other built forms adjacent to this coastal corridor.</p>
<p>4. Housing diversity</p> <p>There is a lack of housing diversity, as high rise is still the predominant form in the revised proposal. There is a need to consider more low- rise housing types i.e terrace housing, single dwellings as demonstrated in the Prince Henry development to the south, to match housing need in the City. Council's draft housing strategy has identified the need for more housing diversity particularly semi-detached housing and low rise medium density housing types to suit family and down sizer households, particularly within the City's more suburban areas and outside of the town centres. Council's draft housing strategy identifies that higher density housing (as proposed by the proposal), is to be located within town centres, close to services and transport. The proposal is therefore inconsistent with the strategy's guiding principles for growth.</p>	<p>In direct response to Council feedback, the PTW scheme incorporates a higher diversity of housing on the site.</p> <p>In particular, the eastern precinct has been amended to include medium-low density housing with building heights between 1-3 storeys and housing typologies including row houses, townhouses and terrace houses. This directly responds to Randwick Council's Draft Housing Strategy which identifies that additional medium density housing supply is needed to meet demand in the LGA.</p> <p>Further, the co-location of a diverse range of housing options in an integrated precinct responds to the planning priority for housing supply, choice and affordability as outlined in the Eastern District Plan.</p>
<p>5. Open space and access</p> <p>The revised scheme has reduced the provision open space from the original planning proposal (lodged on 4 Sept 2019) of 35,670m² (36% of the site) down to 10%; and the configuration, function and usability of the open space proposed is poor.</p>	<p>There is no significant difference to the provision of open space between the September SJB Masterplan, and the alternative PTW scheme. The calculation of open space incorporates the community title lot, located within the centre of the site and a significant portion of open space.</p> <p>There is a marginal reduction in open space between the two schemes as follows:</p> <ul style="list-style-type: none"> ▪ September SJB scheme: 35,670sqm of open space (36.3% of site area) ▪ PTW alternative scheme: 33,286sqm of open space (33.9% of site area) <p>This marginal reduction will not have a noticeable impact on residents or visitors to the site. Further, it is noted the PTW scheme seeks to improve the usability and function of the open space network through reconfiguration of the building footprint. While the central landscaped area is retained, the PTW scheme also incorporates more meaningful and useful pockets of open space throughout the site and on the eastern precinct to integrate with the golf course.</p>
<p>6. Environmental considerations</p> <p>Issues with tower locations, basement excavation and proximity to the sensitive geological miocene site, ESBS</p>	<p>These issues have been addressed in the Heritage Archaeology Statement prepared by Extent and</p>

<p>Feedback</p> <p>and ochre deposits. Insufficient consideration on the potential impacts of the revised scheme on these environmental conditions.</p>	<p>Response</p> <p>Addendum Heritage Impact Statement prepared by Urbis.</p>
<p>7. Transport</p> <p>The revised scheme did not provide any additional information regarding transport and parking provision. Given that the density and overall number of dwellings have only reduced by 15%, the key issues remain regarding the lack of sufficient transport and parking infrastructure to support the intensification of use and the large number of dwellings and unrealistic mode share shift. The original proposal asserts that by using the reduced car parking, improved public transport and the mixed-use precinct, the mode shift between public transport and private vehicles will be essentially swapped from 18% public transport to 68%, and from 64% private vehicle to 30%.</p> <p>This mode shift is unlikely to occur in this location. Moreover, there are already capacity constraints at the Anzac Parade / Beauchamp Road and broader area without any development.</p> <p>Without any certainty in the level of public transport infrastructure investment to the site and area in the short to long term, it is highly unlikely that a mode shift towards the rates proposed in the original proposal can be achieved.</p>	<p>These issues have been addressed in the Addendum Transport Report prepared by TTPP.</p>

4. CONCLUSION

This Supplementary Planning Statement has been prepared in support of a Planning Proposal to amend the RLEP 2012 (RZ/4/2019) for Little Bay Cove, a 12.3-hectare site located at Little Bay. In summary, the Proposal aims to amend to the height and FSR development standards of the site in order to enable additional density on the site in line with population, dwelling and employment forecasts. Additional land uses are also sought through a Schedule 1 LEP amendment applying to the site.

This statement has been prepared in accordance with the relevant provisions of the EP&A Act, the regulations and applicable Local Planning Directions. This report has been informed by the DPIE's *A Guide to Preparing Planning Proposals*, specifically the emphasis on the strategic merit of a proposal.

There is **no reasonable impediment** to the progression of the Planning Proposal through the Gateway process. As identified in this Supplementary Planning Statement and Planning Proposal submitted in September 2019, and the submission to Randwick City Council regarding the Randwick LSPS and Housing Strategy in October 2019, the proposal demonstrates strategic merit through its consistency with the Regional, District and local strategic plans including Council's LSPS and Housing Strategy.

The report has also assessed an alternate Masterplan demonstrating the scope of site specific issues and the potential to consider these design alternatives that are most appropriately dealt with and resolved post Gateway.

Accordingly, this statement and all associated documentation reaffirms the Planning Proposal's consistency with the prevailing policies and demonstrates that the Planning Proposal meets relevant statutory and non-statutory requirements to proceed to, and through, the Gateway process. Specifically, the Planning Proposal:

1. Is consistent with the relevant State and Regional Plan.
2. Is consistent with the Local Strategic Planning Statement and Housing Strategy.
3. Is located on one of the most strategically significant areas in Greater Sydney.
4. Identifies and provides adequate analysis to address key site-specific issues as the Planning Proposal progresses.

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