

## **Attachment F**

**Summary of matters raised in submissions**

**102-106 Dunning Avenue, Rosebery**

Summary of matter raised in submission	Officer's response
<p>Local residents' submissions</p> <ul style="list-style-type: none"> <li>• 31 individual submissions</li> <li>• One petition with 240 signatures (as at 11 April 2018)</li> </ul>	
<p><u>Traffic congestion</u> (Issue raised in 17 submissions)</p> <p>Traffic in Rosebery has increased in recent years, with congestion forming at intersections with Botany Road and Epsom Road during peak times.</p> <p>The additional traffic generated by a development under this planning proposal would unacceptably add to this traffic congestion.</p>	<p>A transport review prepared by Colston Budd Rogers &amp; Kafes accompanied the planning proposal. The review examined the potential for traffic generation by a new development under this planning proposal.</p> <p>The review used RMS rates to predict traffic generation from a new development of <b>22</b> vehicles in morning peak hours and <b>17</b> vehicles during afternoon peak hours.</p> <p>This is compared in the report to current traffic flows at the site, with observed traffic generation of <b>22</b> vehicles in morning peak hours and <b>6</b> vehicles in afternoon peak hours.</p> <p>A new development under this planning proposal is considered to have low traffic generation potential overall, and compared with existing traffic generation from the current development, a small net increase in afternoon peak hours only.</p> <p>The City recognises growing concern relating to traffic congestion and new developments within Rosebery and is adopting a holistic approach to the issue by commissioning a traffic and transport study in Rosebery. This study will establish the performance of the existing transport and traffic network in Rosebery and consider steps to manage future population growth, considering a number of different travel and demand scenarios to provide a robust assessment.</p>
<p>The transport review included in the planning proposal does not consider traffic generation rates for the non-residential component of the proposed development.</p>	<p>It is acknowledged that the transport review that accompanied the planning proposal did not consider traffic generation from the commercial portion of the future development.</p> <p>A more detailed traffic assessment is required to be undertaken as part of any future development application for the site to</p>

	<p>determine the traffic implications of the proposal on the surrounding area. The City actively ensures that all proposals limit on-site car parking and include positive initiatives towards greater active and public transport use, including end of trip facilities and bicycle parking for both residential and commercial components on the site.</p> <p>Despite the omission of the future commercial component from the transport review, a future development under this planning proposal would see a reduction in freight movements from the streets of Rosebery due to the replacement of the existing logistic uses on the site with retail and/or commercial uses.</p>
<p><u>Public transport congestion</u> (Issue raised in 12 submissions)</p> <p>Buses and trains on routes through Rosebery have become unacceptably congested, as a result of recent population growth in Green Square, Mascot and Rosebery.</p> <p>Green Square Station has become overcrowded as a result of population growth in Green Square, and more development and population growth is planned.</p> <p>Public transport is struggling to cope with development and population growth in Mascot, Green Square, Rosebery and the surrounding area, and any development under this planning proposal would unacceptably add to congestion and degradation of public transport services.</p>	<p>A transport review prepared by Colston Budd Rogers &amp; Kafes accompanied the planning proposal. The review emphasised the site's high accessibility to bus routes and the train network.</p> <p>It is noted that the report did not consider existing congestion of those public transport services, and the capacity for public transport networks to absorb additional capacity generated by development under this planning proposal.</p> <p>Rosebery is also located mid-way on a number of bus-routes which are often full or near capacity by the time they reach the area, resulting in commuters being unable to board buses at local stops and increased passenger travel times.</p> <p>Notwithstanding this, the site is well served by a wide range of public transport services, and the additional demand generated by development under this planning proposal will not be significant enough to affect bus or train service standards.</p> <p>The City acknowledges the growing problem of public transport congestion in Green Square and Rosebery, and is currently working closely</p>

	<p>with Transport for NSW to improve public transport in the area.</p> <p>Use of active transport by future residents and workers on this site will reduce demand on public transport. The transport review emphasises Dunning Avenue as a conducive environment for walking and cycling, reflecting the 40km/h speed limit and recent footpath improvements and is flagged for future upgrade works to become a separated cycleway – expanding the regional bike network.</p> <p>The City is aware of increasing public transport congestion in the Green Square Urban Renewal Area and is working with Transport for NSW on a Transport Action Plan (TAP). The TAP aims to identify improvements to increase capacity and relieve congestion of public transport services in the Green Square and Rosebery area in the near term (0-5 years). Recently, Transport for NSW announced that, due to upgrades to the Airport Line expected in 2020, Green Square station will receive up to eight additional services per hour. This is a significant increase in capacity and means trains will depart Green Square every four minutes.</p> <p>The TAP and the City's study will also explore how to expand and promote the use of active transport in the area. Recent footpath improvements and 40km/h speed limit along Dunning Avenue creates a welcoming environment for walking and cycling. The continued promotion of active transport will reduce demand for public transport from new residents and workers.</p>
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<p><u>Changing character of Rosebery</u> (Issue raised in online petition and 10 submissions)</p> <p>Development in Rosebery is changing the character of the area and that development under this planning proposal will further reduce amenity.</p> <p>Taking away the character of the area will turn the suburb into a potential slum.</p>	<p>Urban renewal has occurred in and around Green Square since the 1990s due to the shift away from industrial and manufacturing towards housing in close proximity to the Sydney CBD. Rosebery, while located out of the Green Square Urban Renewal area, has experienced significant gentrification with high demand for housing. It is also a popular destination for visitors attracted by the emerging foodie precinct.</p> <p>In the development of the City's Employment Lands Strategy, the potential of the investigation areas to accommodate a genuine mixed use area with some housing was recognised given their proximity to public transport, infrastructure and generally high level of amenity. The abovementioned Guideline provided a planning pathway to manage growth in the area.</p> <p>Rezoning in the 'investigation areas' is subject to a detailed site-by-site planning proposal process, which will balance residential development with protecting existing employment uses, whilst ensuring adequate infrastructure is provided. This approach allows for more controlled management of growth and change in Rosebery, including a nuanced assessment of the built form, its impact on the streetscape and the wider character of the suburb.</p> <p>The proposed built form arising from this planning proposal, discussed in more detail above, has been designed to minimise impact on the public domain and complement surrounding development.</p> <p>The draft DCP specifies that any future development on the site is designed to limit the overall mass and sense of scale from the public domain, achieved by a three metre landscaped setback along the northern frontage and an additional setback to the upper levels above the three storey podium. The taller building elements will therefore be setback a minimum</p>
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	of 4 metres from Dunning Avenue and a minimum of five metres from Morley Avenue and Jones Lane.
Apartment development in remnant industrial areas of Rosebery undermines the historic structure of the area, and threatens the low density character of traditional residential areas in Rosebery.	The basic structure of Rosebery, with employment uses towards Botany Road and low density residential in the south-east, is not proposed to change. The low density Rosebery Estate area is not located in the 'investigation areas' and will not see a change in character as a result of this planning proposal, or indeed later planning proposals that may be considered in these areas.
<p>Tall buildings will change the character of the street, from trees and greenery to a “concrete jungle”.</p> <p>The proposed scheme will result in "high rise" apartments in the area, which will decrease the value of nearby homes.</p>	<p>The proposed scheme includes significant landscaping and greenery, including a 3m landscaped setback to Morley Avenue, 6m deep soil at the rear of the site, 1,420sqm ground level communal landscaping, and up to 2,800sqm of landscaping on the level 3 terrace and rooftops.</p> <p>This landscaping will contribute to the streetscape and leafy character of the area, and reduce the sense of height from street level and adjoining properties.</p> <p>The proposal is unlikely to have a negative impact on the value of housing in the area.</p>
<p><u>Building heights</u> (Issue raised in 10 submissions)</p> <p>The height is in excess of other buildings nearby, and will block morning sunlight and views to existing apartments.</p> <p>The proposed 29m maximum height limit will cause overshadowing, reduce breezeways, decrease natural light and change the landscape.</p>	<p>The exhibited envelope locates the tallest building (29m) on Dunning Avenue, with smaller buildings towards Jones Lane and Botany Road. The exhibited scheme has been carefully designed to reduce height impacts on neighbouring residential properties.</p> <p>An urban design analysis of the proposed envelope shows no overshadowing or view loss to neighbouring residential buildings. The exhibited DCP constrains the maximum height to one building, with the other two buildings being less tall and the podium only three storeys.</p>

<p><u>Loss of employment floorspace</u> (Issue raised in 4 submissions)</p> <p>The planning proposal is within the Southern Employment Lands, and the proposal includes predominantly residential floor space. There will be a net loss of non-residential GFA compared to the current development on the site, and a further potential loss compared to developable potential under current planning controls.</p> <p>The planning proposal is contrary to the Eastern City District Plan, by reducing the amount of non-residential GFA on the site and hence the ability of the site to generate economic activity and jobs close to where people live.</p>	<p>The Employment Lands Strategy envisaged the investigation areas as locations where some residential development may be considered where planning merit is demonstrated, employment land is retained, and the proposal delivers significant community benefits and contributes towards local infrastructure. Some loss of employment floorspace is acknowledged as part of this transition.</p> <p>Notwithstanding this, the proposed scheme is unlikely to compromise the employment generating potential of the investigation area. While a net loss of employment floorspace is acknowledged, the proposed scheme will result in about 1,000 square metres of commercial floorspace over two levels at the intersection of Dunning and Morley Avenues and will have an ongoing employment capacity of 25-30 jobs, when using the average ratios provided in the City of Sydney Development Contributions Plan 2012.</p> <p>On balance, the proposed scheme retains a comparable employment rates to the existing development, and the planning proposal will not compromise the employment generating potential of the Southern Employment Lands.</p>
<p>The planning agreement includes a minimum 10% non-residential GFA, which is not enough to achieve a genuine mix of employment uses, community uses and market and affordable housing, as outlined in the City of Sydney Employment Lands Strategy for the investigation areas.</p>	<p>Under the <i>Employment Lands Strategy</i>, the vision for the Southern Employment Lands is for genuine mixed use precincts comprising a relatively even mix of residential and non-residential development. It is acknowledged that not all sites will not result in a 50/50 split, but that the mix will be achieved at a precinct level. This will continue to be managed through the process of considering planning proposals to rezone land under the <i>Guideline to Preparing a Site Specific Planning Proposal in the City of Sydney Employment Lands Investigation Areas</i>.</p>

<p><u>Heritage</u> (Issue raised in 5 submissions)</p> <p>The development will have an unfavourable impact on the two local heritage items.</p>	<p>The draft DCP ensures that future development on the site is sympathetic to adjacent heritage items by providing a three metre landscape setback to the Morley Street frontage, consistent with the alignment of the retained heritage warehouse building located to the east of the site. The draft DCP specifies that any future development on the site is to be sympathetic to the inter-war warehouse character of the area through the use of external finishes, colours and materials including a brick façade to the podium.</p> <p>The planning agreement will secure the dedication of a 1.25 metre deep frontage to Jones Street for footpath widening and to create additional separation between the future development and the adjacent heritage item to the west of the site. The draft DCP also specifies a setback of an additional five metres for the upper levels of the new development and requires use of appropriate external finishes, colours and materials that are sympathetic to the heritage items and the local character, limiting any additional heritage impacts.</p>
<p><u>Precedent for development into Rosebery</u> (Issue raised in 4 submissions)</p> <p>Changing the planning controls on this site will set a precedent for other nearby sites to seek the same planning controls.</p>	<p>The subject site is within the “investigation areas” identified under the City of Sydney’s <i>Employment Lands Strategy</i> as having potential for residential development where it can be demonstrated that the broader objectives of the strategy are being met.</p> <p>Other sites in the investigation areas are entitled to also seek changes to the planning controls in the way this site has, under the <i>Guideline to Preparing Site Specific Planning Proposal Requests in the City of Sydney Employment Lands Investigation Areas</i>. Under this approach, each request to change the planning controls will only be supported where planning merit is demonstrated, and where it is consistent with the vision for the investigation</p>



	areas as put forward in the <i>Employment Lands Strategy</i> .
<p><u>Parking</u> (Issue raised in 4 submissions)</p> <p>The proposed scheme does not include enough parking for residents, workers and shoppers. This will add to pressure for on-street parking in the Rosebery area.</p>	<p>A transport review prepared by Colston Budd Rogers &amp; Kafes for this planning proposal has estimated off-street parking provision based on indicative unit mix and the parking rates as set out in Sydney LEP 2012. The number of off-street parking spaces will not be determined until the development application stage.</p> <p>The Sydney LEP 2012 sets maximum rates for the provision of off-street car parking within new residential flat buildings and commercial developments. Rates are based on indicative unit mix and the site's proximity to existing public transport. The exact number of off-street parking spaces will be determined at the development application stage, however the objective of this approach is to discourage car ownership in well located areas and reduce the congestion impact of new developments.</p> <p>Kerbside parking in the City of Sydney is managed in accordance with the City's 'Neighbourhood Parking Policy', which excludes new buildings from eligibility for visitor, resident and business parking permits. As such, workers and residents of any future development would not receive parking permits for on-street parking.</p>
<p><u>Lack of infrastructure</u> (Issue raised in 4 submissions)</p> <p>Development in Rosebery has not been aligned with delivery of new infrastructure, resulting in loss of amenity for existing residents. Any development under this planning proposal will unacceptably add to existing impacts of growth and further reduce amenity.</p>	<p>This planning proposal is being prepared under the City of Sydney <i>Employment Lands Strategy</i>, which identifies "investigation areas" where some residential development may be considered as long as the value uplift contributes to infrastructure in the area.</p> <p>Under the strategy, planning agreements capture 50% of the value uplift provided by the rezoning of a site under a planning agreement, for the purposes of providing infrastructure. For this planning proposal, the value uplift is delivering on-site affordable housing and footpath widening.</p>

	<p>On-site affordable housing is an important infrastructure contribution to the Rosebery area, providing local housing for key workers.</p>
<p>With recent development and population growth in Green Square, Rosebery and the surrounding area, there is a need for more school places.</p>	<p>The City is aware of the need for more school places across the local government area, and especially in Green Square. As a result of facilities sharing agreements between the City and the Department of Education and Communities (DEC), a new primary school at Green Square Town Centre has been recently announced, and an expansion of Alexandria Park Community School has been confirmed. The City will continue to work with the DEC, updating them on population projections as a result of new development, and working with them to deliver new school locations and expand capacity at existing schools.</p>
<p>Existing parks and open space are insufficient to meet the growing population of Rosebery, and a development under this planning proposal will further add to demand.</p>	<p>The exhibited DCP with this planning proposal includes 1,420sqm of ground floor communal open space, and a 6m deep soil setback to the rear. While this open space will not be accessible by the public, it will give future occupants access to semi-private open space and mitigate additional demands on nearby public open space.</p> <p>New parks and open space have been delivered in Rosebery and Green Square as a result of recent development, and new open space is planned as part of future development sites. The subject site is within close walking distance to the recently opened Sweetacres Park, and the recently upgraded Turruwul Park. Sydney Park is a 30 minute walk or 10 minute cycle from the subject site.</p>
<p>The subject site should become a park, instead of being developed for additional housing.</p>	<p>Sydney DCP 2012 identifies proposed new public open space locations to be delivered alongside redevelopment. The subject site has not been identified as part of the open space network.</p>

<p><u>Cycling facilities</u> (Suggestion raised in 2 submissions)</p> <p>A new development under this planning proposal should include at-grade bicycle parking for residents, visitors and the general public.</p>	<p>The quantity and location of bicycle parking will be determined at the development application stage. Sydney DCP 2012 includes general requirements for bicycle parking, including quantity of spaces provided and accessibility requirements.</p>
<p>The planning proposal should include dedication of land for and/or construction of an off-street section of bicycle path along Dunning Avenue.</p>	<p>The frontage of the subject site to Dunning Avenue is too short for land dedication to meaningfully contribute to a cycle path.</p> <p>Dunning Avenue is identified on the Liveable Green Network as a Cycling Priority Street. A 40km/h speed limit contributes to the street's amenity for cycling. A possible north-south separated cycleway through Rosebery is still under investigation, but will not be delivered as a result of any one single planning proposal or development.</p>
<p>Existing kerb ramps be flattened to enable better access.</p>	<p>The suggestion is noted. Detailed public domain considerations will be part of any future development application process.</p>
<p><u>Concern over design quality</u> (Issue raised in 2 submissions)</p> <p>Recent developments in Rosebery and Green Square have exhibited poor design quality, and there is concern that a future development under this planning proposal will also have poor design outcomes.</p>	<p>The draft DCP amendment exhibited with this planning proposal provides detailed design guidance, and includes provisions for a design excellence strategy to guide a future competitive design process for the entire site.</p>
<p><u>Inadequate setbacks</u> (Issue raised in 2 submissions)</p> <p>The proposed scheme has no setbacks to Dunning Avenue and Morley Avenue, which is out of context for nearby streets. This will establish a new and inappropriate character for the area.</p> <p>The proposed landscaping to Morley Avenue is inadequate to provide amenity to future occupants of ground floor residential units.</p>	<p>The draft DCP exhibited with this planning proposal includes design guidance for setbacks, including ground floor and upper level setbacks.</p> <p>There is a 3m ground floor setback to Morley Avenue proposed. The portions of ground floor with residential frontage are proposed to have landscaped setback, and the commercial frontage a paved setback. This will provide privacy and amenity for the residential units,</p>

	<p>and better access and visibility for the commercial and retail occupants.</p> <p>Dunning Avenue and Jones Lane frontages are not proposed to have ground floor setbacks, which is appropriate in context of built form. For upper levels, the Dunning Avenue frontage is proposed to have a minimum 4m setback, Jones Lane a minimum 6m setback, and for the three taller buildings on Morley Avenue a minimum 2m setback.</p>
<p><u>Developer profits</u> (Issue raised in 7 submissions and 1 petition)</p> <p>The planning proposal is being pursued for the purposes of delivering profits to a developer and not to improve community outcomes.</p>	<p>The City's <i>Employment Lands Strategy</i> identifies "investigation areas" where a rezoning may be considered if it delivers significant community benefits and contributions to local infrastructure.</p> <p>This planning proposal being assessed under this strategy, and through a planning agreement captures 50% of the value uplift that results from a change in the planning controls.</p> <p>The exhibited planning agreement describes how the captured value uplift is being employed to deliver better infrastructure for the local area, which includes approximately 12 affordable housing units delivered on-site, and land for footpath widening. This represents a significant positive outcome for the community.</p>
<p><u>Support for on-site affordable housing</u> (Raised in 1 submission)</p> <p>People cannot afford to rent in the area, resulting in long commutes and poor quality of life for employees of local businesses in Rosebery and Alexandria. The proposed inclusion of on-site affordable housing is therefore very important and a great cause.</p>	<p>Support is noted.</p>

<p><u>Increased litter, noise and pollution; degradation of kerbsides and plantings</u> (Issue raised in 1 submission)</p> <p>A higher population of people living in Rosebery has had negative effects on the local environment and physical streetscape, caused by pollution and damage to the public realm. Any development under this planning proposal will unreasonably add to these negative effects.</p>	<p>Managing pollution and maintaining the public realm is the ongoing responsibility of Council. We encourage all residents to report issues to Council so that action can be taken against offenders and maintenance work be completed.</p> <p>The proposed scheme will result in local residential population growth, but it is not supported that these future residents will necessarily cause pollution and landscape damage.</p>
<p><u>Inappropriate residential frontage</u> (Issue raised in 1 submission)</p> <p>Morley Avenue is characterised by non-residential development. The proposed ground floor residential frontage to Morley Avenue does not respect the character of the street, and will be adversely impacted by trucks and vehicles using Morley Avenue.</p> <p>The first two storeys of a new development should be non-residential, to better suit the character of the street and reduce impacts to residential occupants.</p>	<p>The indicative scheme exhibited with the planning proposal assumes the minimum 10% non-residential floor area as mandated in the exhibited controls. The most suitable location for the non-residential space is along Dunning Avenue and at the corner of Dunning and Morley where a significant commercial development already exists.</p> <p>The 3m landscaped setback to ground floor residential units as included in the exhibited DCP will provide privacy and protection from noise impacts from Morley Avenue.</p> <p>The final mix of land uses will be determined at the development application stage.</p>
<p><u>Inappropriate context for residential</u> (Issue raised in 1 submission)</p> <p>The site is surrounded by non-residential land uses. Residential occupants of any future development will be unreasonably impacted by the neighbouring non-residential uses. This will cause land use conflicts, resulting in further loss of employment from the local area.</p>	<p>Under the City of Sydney's <i>Employment Lands Strategy</i>, the vision for the "investigation areas" is for vibrant, high amenity precincts that include a genuine mix of employment uses, community uses, and market and affordable housing. This is possible in the investigation areas because the nature of most existing employment uses is such that there is unlikely to be significant land use conflicts with residential uses.</p>

	<p>Further, the changing nature of businesses in the area is towards creative industries, small professional businesses and retail, employment uses that are likely to benefit from a higher local residential population.</p>
<p><u>Inappropriate vehicular access to Dunning Avenue</u> (Issue raised in 1 submission)</p> <p>The proposed scheme provides for vehicle access to off-street parking via Dunning Avenue. Jones Lane is a more appropriate location, as it would provide a more direct route to Botany Road and reduce vehicle movements on Dunning Avenue.</p>	<p>The proposed vehicular access point on Dunning Avenue is a result of flood level analysis. The corner of Jones Lane and Morley Avenue is significantly flood affected. An entry point at this location may result in basement car park flooding and cutting off vehicular access during flood events.</p>
<p><u>Location of deep soil is inappropriate</u> (Issue raised in 1 submission)</p> <p>The 6m deep soil setback is in a location that will be overshadowed by built form, and not provide amenity for future occupants or the community. The deep soil should be relocated to the north of the site.</p>	<p>The location of the deep soil setback was determined through urban design analysis, to provide separation to the neighbouring property and greenery for south facing views. It is acknowledged that the setback will not receive full sunlight, but the communal open space will receive adequate sunlight for Apartment Design Guide specifications.</p> <p>The indicative scheme includes landscaped setback to the north of the site, as well as rooftop gardens on the level 3 terrace, which will contribute to amenity for residents and the community.</p>
<p><u>Additional public domain upgrades</u> (Suggestion raised in 1 submission)</p> <p>Nearby streets should be upgraded to include rain gardens and other water sensitive urban design features, and opportunities for additional landscaping be investigated, including a tree in the Dunning Avenue and Morley Avenue roundabout.</p>	<p>This planning proposal is for an individual block and does not encompass any new or existing streets. Therefore, public domain upgrades outside the site cannot be included in the planning proposal.</p> <p>The City will note the demand for plantings, rain gardens and other upgrades that may be commensurate with new development on the site, and consider it as part of future public works.</p>

<p><u>Consultation process</u> (Issue raised in 1 submission)</p> <p>The Rosebery Residents Action Group was not consulted about this planning proposal.</p>	<p>City staff emailed a notification of this planning proposal to the spokesperson of the Rosebery Residents Action Group when public exhibition opened on 14 March 2018.</p>
<p><u>Maintenance of landscaping</u> (Issue raised in 1 submission)</p> <p>Gardens in recently delivered new developments in Rosebery feature gardens that are poorly maintained and have poor plant selections.</p>	<p>Development applications typically involve a landscaping maintenance plan, which is reviewed by a City landscaping specialist and forms part of the approval.</p> <p>Ongoing maintenance of communal open space and landscaping within a development is the responsibility of the strata or building manager. The City recommends that concerns about the maintenance of gardens in any specific address be forwarded to Council customer service, where the complaint can be followed up with the building manager.</p>