

# Submissions Report

Redfern Place – 600-660 Elizabeth Street, Redfern

Submitted to the Department of Planning, Housing and  
Infrastructure  
on behalf of Bridge Housing

SSD-51274973



**'Gura Bulga'**

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



**'Dagura Buumarri'**

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



**'Gadalung Djarri'**

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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16 April 2025

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# 1.0 Introduction

This Submissions Report has been prepared by Ethos Urban on behalf of Bridge Housing (the Applicant) and is submitted to the Department of Planning, Housing and Infrastructure (DPHI) to address submissions and key issues raised in the following the public exhibition of the Environmental Impact Statement (EIS) for the detailed design, construction and operation of a mixed use development. The development comprises four new buildings that provide affordable and social housing, specialist disability accommodation (SDA), as well as commercial and community uses on land at 600-660 Elizabeth Street, Redfern (the site) (SSD-51274973).

The State Significant Development Application (SSDA) (SSD-51274973) was lodged with the DPHI and was publicly exhibited for 28 days from 7 November 2024 to 4 December 2024, providing the City of Sydney Council, State agencies, and members of the general public the opportunity to make submissions on the project. A summary of the project as exhibited is provided in **Section 1.1**.

This Submissions Report provides an analysis of submissions, actions taken since public exhibition, the Applicant's response to submissions and provides an updated justification of the proposed development. It is accompanied by supporting information and technical reports (refer to the Table of Contents).

This Submissions Report, as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), has been prepared in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report*.

## 1.1 Exhibited Development (SSD-51274973)

SSD-51274973, as exhibited, seeks consent for the detailed design, construction and operation of a new mixed-use development comprising four new buildings that provide social, affordable and SDA housing, a community facility and commercial uses at 600-660 Elizabeth Street, Redfern.

Specifically, the exhibited development sought consent for the following:

- demolition of the existing PCYC buildings and associated structures;
- tree removal;
- bulk earthworks including excavation;
- construction of a one (1) three (3) storey community facility building (Building S1);
- construction of two (2) residential flat buildings (Buildings S2 and S3) up to 14 and 10 storeys respectively;
- construction of one (1) five (5) storey mixed use building (Building S4) comprising commercial uses on the ground level and residential accommodation above;
- construction of one (1) basement level below Buildings S2, S3 and part of S4 accessible from Kettle Street;
- site-wide landscaping and public domain works including north-south and east-west pedestrian through-site link and dedications for footpath widening along Elizabeth Street and Phillip Street; and
- civil and utilities infrastructure required to support the development.



**Figure 1** *Artist's impression of the proposed development (as exhibited)*

Source: Source: Hayball, Architecture AND, Silvester Fuller

## 2.0 Analysis of Submissions

The following section provides a summary of the submissions received during the public exhibition of SSD-51274973 from 7 November 2024 to 4 December 2024.

Consistent with the DPHI's *State significant development guidelines – preparing a submissions report*, a Submissions Register is provided at **Appendix A**. The Submissions Register delineates where each submission has been responded to within this Response to Submissions Report.

### 2.1 Overview

During the public exhibition period for SSD-51274973, a total of 33 submissions were received, including submissions made by government authorities and agencies, other organisations, and the general public.

The exhibition of SSD-51274973 attracted the following submissions:

- 10 submissions from government agencies and bodies, which provided commentary on and did not explicitly state their support nor opposition to the application; and
- 23 submissions were received from members of the general public, including community groups, of which nine (9) opposed, eight (8) supported the application, and six (6) provided comments but did not explicitly state their support or opposition.

On the 12 December 2024, the DPHI issued a letter requesting further information on a number of key issues, and responses to issues raised in the submissions.

The numerical breakdown of the submissions received (as registered on the Planning Portal) is provided in **Table 1** and includes the number of stakeholders who indicated objections, provided neutral comments, provided support, or requested additional information and/or provided recommended conditions in relation to the Project.

**Table 1** Submissions received – numerical overview

Submissions	Support	Oppose	Neutral / Comments
Government agencies	0	0	10
Public submissions	8	9	6
DPHI Key Issues Letter	0	0	1
<b>Total</b>	<b>8</b>	<b>9</b>	<b>17</b>

## 2.2 Summary of Raised Issues

An overall summary of the issues raised in the submissions received is provided in **Table 2**. Issues raised have been grouped into the categories provided within the DPHI's *State significant development guidelines – preparing a submissions report*.

**Table 2** Summary of issues raised

Category	Issue	Stakeholder
The project	<ul style="list-style-type: none"> <li>Privacy concerns of bedrooms directly adjoining the proposed breezeways as well as potential views from Building S3's breezeway into adjacent apartments.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>Public submissions</li> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Provision of end-of-trip facilities for staff on site.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> </ul>
	<ul style="list-style-type: none"> <li>Recommendation that all residents are provided access to the communal waste room.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Recommendation that units which do not achieve cross ventilation should be fitted with ceiling fans.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Observation that the vertical plenums proposed is unlikely to achieve the <i>City of Sydney's Alternative natural ventilation of apartment in noisy environments (draft)</i> which can be used as a guide.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Landscaping <ul style="list-style-type: none"> <li>Recommendation to explore opportunities for greater deep soil provision and green space, consistent with the Design Guidelines and the advice of the Design Review Panel.</li> <li>Recommendation for planters to achieve a minimum depth of 800mm and further greening of roofs.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Consideration of shade for the roof top communal open spaces</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Request for additional 3+ bedroom apartments where possible (across all buildings).</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Concerns raised regarding insufficient parking and access to the basement car park.</li> </ul>	<ul style="list-style-type: none"> <li>Public submissions</li> </ul>
	<ul style="list-style-type: none"> <li>Concerns raised regarding the height of Building S2.</li> </ul>	<ul style="list-style-type: none"> <li>Public submissions</li> </ul>
Procedural matters	<ul style="list-style-type: none"> <li>Provide an updated request to waive the need to prepare a Biodiversity Development Assessment Report (BDAR).</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>Biodiversity and Science Group</li> <li>Department of Climate Change, Energy, the Environment and Water</li> </ul>
	<ul style="list-style-type: none"> <li>Confirmation of the areas of ground floor and rooftop communal open space provided for each building.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> </ul>
	<ul style="list-style-type: none"> <li>Confirmation of the methodology used for calculating construction and operational jobs.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> </ul>
	<ul style="list-style-type: none"> <li>Request for an agreed letter of offer to enter into a Voluntary Planning Agreement with City of Sydney Council to widen the footpaths on Elizabeth and</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>City of Sydney</li> </ul>

Category	Issue	Stakeholder
	Phillip Streets, and for a public access easement over the through-site links.	
	<ul style="list-style-type: none"> <li>Updated Operational Waste Management Plan to address comments related to waste (including waste storage areas and access pathways) and detail the on-street waste collection for the community centre.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Provide scales on GFA plans and reconfirm the GFA values for each floor.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> </ul>
	<ul style="list-style-type: none"> <li>Request for a loading dock management plan.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Conditions regarding footpaths and public domain to be imposed.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Plans to be approved by Sydney Water prior to demolition, excavation or construction works commencing.</li> </ul>	<ul style="list-style-type: none"> <li>Sydney Water</li> </ul>
	<ul style="list-style-type: none"> <li>Submission of an application required requesting permission to discharge trade wastewater to Sydney Water's sewerage system (should the development generate trade wastewater).</li> </ul>	<ul style="list-style-type: none"> <li>Sydney Water</li> </ul>
	<ul style="list-style-type: none"> <li>A Road Occupancy Licence (ROL) is to be obtained from Transport Management Centre for any works that may impact on traffic flows on Elizabeth Street during construction activities.</li> </ul>	<ul style="list-style-type: none"> <li>Transport for NSW</li> </ul>
	<ul style="list-style-type: none"> <li>Approval is to be sought from Council for any on-street loading zone proposed on Walker Street/Elizabeth Street.</li> </ul>	<ul style="list-style-type: none"> <li>Transport for NSW</li> </ul>
	<ul style="list-style-type: none"> <li>Provide an updated Remediation Action Plan addressing the land to be dedicated to Council.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Updated sections should be provided to show loading area heights.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Operational Waste Management Plan to show a 10.6m waste truck can be accommodated.</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>NSW Environment Protection Authority</li> <li>City of Sydney</li> </ul>
	<ul style="list-style-type: none"> <li>Recommendation for erosion and sediment control, air quality, chemical and contamination conditions be implemented.</li> </ul>	<ul style="list-style-type: none"> <li>NSW Environment Protection Authority</li> <li>Public submissions</li> <li>City of Sydney</li> </ul>
<b>Economic, environmental and social impacts</b>	<ul style="list-style-type: none"> <li>Flooding <ul style="list-style-type: none"> <li>Concerns raised around the current inadequate flood mitigation measures.</li> <li>Flood Impact and Risk Assessment to be updated to assess full range of flood events up to the Probable Maximum Flood.</li> <li>Request for comprehensive flood emergency response plan.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>Department of Climate Change, Energy, the Environment and Water</li> <li>City of Sydney</li> <li>NSW State Emergency Service</li> </ul>
	<ul style="list-style-type: none"> <li>Further assessment required for wind environment for privacy balconies/terraces, rooftop communal open space, and breezeways, and identification of mitigation measures (if required).</li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>Public submissions</li> </ul>

Category	Issue	Stakeholder
	<ul style="list-style-type: none"> <li>Archaeology and Heritage               <ul style="list-style-type: none"> <li>Recommendation to update Mitigation Measures to address further archaeological investigations in the PCYC building footprint.</li> <li>Request that photographic archival recording of the PCYC buildings and its murals be prepared prior to demolition.</li> <li>Recommendation that a heritage interpretation plan is prepared for the PCYC.</li> <li>Confirmation required on whether an Archaeological Research Design (ARD) was completed in advance of the 2023 archaeological excavations as required by the guideline <i>Archaeological Assessments</i> (Heritage Office and DUAP 1996). If no ARD was completed, provide clarification on why this approach was taken.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>DPHI Key Issues Letter</li> <li>Heritage NSW</li> <li>Department of Climate Change, Energy, the Environment and Water</li> </ul>
	<ul style="list-style-type: none"> <li>Confirmation of compliance with the conditions of AHIP 4818 (DOC21/819353), namely, Conditions 25 to 27 is required.</li> </ul>	<ul style="list-style-type: none"> <li>Department of Climate Change, Energy, the Environment and Water</li> </ul>
	<ul style="list-style-type: none"> <li>Request for an addendum to the ACHAR dated May 2022.</li> </ul>	<ul style="list-style-type: none"> <li>Department of Climate Change, Energy, the Environment and Water</li> </ul>
	<ul style="list-style-type: none"> <li>Noise impacts               <ul style="list-style-type: none"> <li>Noise mitigation measures should be made to minimise off-site impacts (particularly in relation to public address (PA) equipment)</li> <li>Recommendation that construction activities must only be undertaken during the construction hours noted.</li> <li>Recommendation for Noise and Vibration Impact Assessment to demonstrate adequate quantum of airflow to habitable rooms is achievable.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>NSW Environment Protection Authority</li> <li>City of Sydney</li> <li>Environment Protection Authority</li> <li>Public submissions</li> </ul>
	<ul style="list-style-type: none"> <li>Hydrology impacts               <ul style="list-style-type: none"> <li>Concerns regarding the tree planting inflicting damage on Sydney Water's underground assets.</li> <li>Requirement for a Boundary Trap if the development discharges where arrestors and special units are installed.</li> <li>Requirement for a testable Backflow Prevention Containment Device if the development is connected to Sydney water.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Sydney water</li> </ul>
	<ul style="list-style-type: none"> <li>Traffic Impacts               <ul style="list-style-type: none"> <li>Request for a Construction Pedestrian and Traffic Management Plan (CPTMP) should be prepared in consultation with TfNSW.</li> <li>Request for a Travel Access Guide to be prepared in consultation with TfNSW.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Transport for NSW</li> </ul>
	<ul style="list-style-type: none"> <li>Explore further opportunities to retain existing trees.</li> </ul>	<ul style="list-style-type: none"> <li>City of Sydney</li> <li>Public submissions</li> </ul>
	<ul style="list-style-type: none"> <li>Recommendation for construction waste to be disposed in accordance with the EPA.</li> </ul>	<ul style="list-style-type: none"> <li>NSW Environment Protection Authority</li> </ul>
	<ul style="list-style-type: none"> <li>Safety concerns associated with provision of social housing in the area.</li> </ul>	<ul style="list-style-type: none"> <li>Public submissions</li> </ul>
	<ul style="list-style-type: none"> <li>Opposition to the project being perceived as a complete divestment of public land.</li> </ul>	<ul style="list-style-type: none"> <li>Public submissions</li> </ul>

## 2.3 DPHI Key Issues Letter

The DPHI Key Issues Letter dated 12 December 2024 requested further information on a number of issues raised in the submissions. The additional information requested is in relation to:

- Flooding impacts;
- Stormwater management;
- Voluntary Planning Agreement with City of Sydney Council;
- Contamination;
- Biodiversity Development Assessment Report waiver;
- Wind impacts;
- Dwelling privacy;
- Operational Waste Management;
- Provision of end-of-trip facilities;
- Archaeological investigations;
- Construction and operational job calculations; and
- Communal open space areas.

A detailed response to each issue raised in the DPHI letter is provided in the Submissions Register at **Appendix A**.

## 2.4 Government and Agency Submissions

A total of 10 submissions were received from local, state and federal government agencies, including the following:

- City of Sydney;
- NSW Department of Climate Change, Energy the Environment and Water;
- Heritage NSW;
- Heritage Council of NSW;
- NSW Environment Protection Authority;
- Fire and Rescue NSW;
- NSW Police Force;
- Transport for NSW;
- NSW State Emergency Service; and
- Sydney Water.

The above agencies each provided commentary on and did not explicitly state their support nor opposition to the SSDA. It should be noted that Fire and Rescue NSW had no comments on the proposal. A detailed response to each agency submission is provided within the Submissions Register at **Appendix A**.

## 2.5 Public Submissions

A total of 23 submissions were received from members of the general public during the public exhibition of SSD-51274973, including two (2) from community groups. Of the submissions, 16 opposed the proposed development, eight (8) supported the development, and two (2) provided comments without supporting nor opposing the project. Despite nine (9) submissions registering under the 'comment' category on the DPHI website, the content of those submissions raised objections to the development and have been captured in the 16 objections noted above.

A detailed response to each public submission is provided within the Submissions Register at **Appendix A**.

## 3.0 Actions taken since Exhibition

Following public exhibition of the SSDA, the Applicant and the consultant team have undertaken the following actions:

- Correspondence dated 12 December 2024 was received from DPHI, requesting a review of the submissions be undertaken and a response be provided on the issues raised in the submissions. On receipt of this correspondence, a review of the submissions was undertaken.
- A meeting was held with council's waste and traffic team on 24 February 2025 and with council's flooding team on 25 February with council's flooding team to discuss the proposed amendments in response to the comments received;
- Written correspondence noting the revised approach to the Walker Street tree retention discussed further below was issued to council's tree management team;
- Since lodgement of the SSDA, the Applicant has undertaken further design development, reviewed the proposal in light of the submissions received and progressed the detailed design of SSD-51274973 including the flood mitigation measures, landscaping throughout the site, provision of end of trip facilities and other design amendments to improve overall amenity.
- A fifth Design Review Panel (DRP) session was held on 18 March 2025 to present the lodged proposal and how previous feedback from the fourth DRP was addressed, and provide an overview of the design amendments that had been made in response to the public exhibition submissions.
- The project team has prepared the amended design and further engaged with stakeholders as relevant to respond to the correspondence received.
- A fourth Design Jam was conducted by Yerrabingin with the design team post lodgement, which provided an opportunity for the Aboriginal community to inform the further design development of the PCYC.
- The supporting reports have been amended (or addenda have been provided where appropriate) and new reports prepared where required to respond to DPHI feedback, addressing issues raised in submissions, and to provide an assessment of the amended design.
- Updated plans have been prepared by the design consortium comprising Hayball, Architecture AND, Silvester Fuller and Aspect Studios detailing the design amendments proposed.
- A Submission Report (this report) has been prepared in accordance with the DPHI's *State significant development guidelines – preparing a submissions report*.

A more detailed overview of the actions undertaken since exhibition is outlined below.

### 3.1 Project Amendments

Following the Public Exhibition of the proposed development, a number of design refinements and amendments have been made in response to the submissions received and further design development. Importantly, these refinements and changes remain consistent with the project description within the exhibited SSDA and do not raise any additional environmental impacts. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposed development is not required.

The following amendments are proposed to the project:

- Additional flood mitigation measures including:
  - Introduction of drainage pits near the Building S2 entry and inclusion of drainage pipe to flood storage tank located under Building S4;
  - Increase in flood storage tank area beneath Building S4;
  - All terraces on Walker Street have been raised to be above the Probable Maximum Flood (PMF) ensuring residents can shelter safely in place; and
  - Minor design amendments to the access of the fire pump room to ensure the fire pump room is protected during a flood event.
- Basement Level:
  - Increased individual building waste storage areas and reconfiguration/relocation of residential bulk store room;
  - Inclusion of end-of-trip facilities for commercial uses comprising 13 personal lockers and two (2) shower and change cubicles; and

- Amendments to bicycle parking to comply with the relevant Australian Standards.
- Revised Building S4 northeast lobby to improve accessible ramp access to the lift and provide improved bicycle access to the basement.
- Amendments to improve residential privacy including:
  - Raised windowsill heights on bedrooms interfacing with breezeways; and
  - Introduction of window hoods on levels 1-4 of Building S3 apartments to mitigate onlooking from the breezeways.
- Potential retention of additional high value street trees addressed through proposed change to landscape treatment on Walker Street;
- Site-wide landscaping amendments comprising:
  - Additional shading structure on Building S4 rooftops;
  - Further development of rooftop gardens including use of moveable planters;
  - Further refinement of rooftop planter soil depths;
  - Further refinements to the planting palette;
  - Updates to Phillip and Elizabeth Street footpaths to align with Council's public domain guidelines; and
  - Refined Ground Level courtyard design to enhance constructability and address crime prevention through environmental design concerns.
- Ongoing design development and updates including:
  - Building S1:
    - Further resolution of materials;
    - Reduced lift core and lift overrun allowances;
    - Amendments to the Ground Level and Level 2 amenities;
    - Updated waste and storage rooms; and
    - Reduction of GFA from 3,542m<sup>2</sup> to 3,535m<sup>2</sup> (total reduction of 7m<sup>2</sup>).
  - Building S2:
    - Inclusion of Building S2 Grand Juliet balconies only provided to apartments without traditional balconies. Full-height windows replace the previous façade design and include awning operability;
    - Removal of pitched roof motif from lower levels;
    - Removal of Ground Level breezeway pop outs to avoid imposition on the central communal space and improve building security;
    - Refinement of bathroom windows to allow for durable internal wall lining arrangement and to host internal bathroom services; and
    - Refinement of materiality including replacement of brick slips with solid full brick at the base for durability.
  - Building S3:
    - Removal of Ground Level breezeway pop outs to avoid imposition on the central communal space; and
    - Provision of awning over building entry for weather protection.
  - Building S4:
    - Revision of planter along Elizabeth Street from two-tier to single-tier to improve soil depth;
    - Revised commercial amenities;
    - Amendments to north-west lobby to improve access to reception; and
    - Inclusion of metal fin screen on ground level for natural ventilation to fire pump room.

Further detail is provided in the Design Report Addendum at **Appendix E** and Landscape Design Report Addendum at **Appendix H**.

## 3.2 Further Assessment Undertaken

In response to the submissions received as well as the design refinements made, further assessment of the impact of the proposed development has been undertaken with the amended documentation listed in the Table of Contents and is discussed further in **Section 4.0**.

## 4.0 Response to Submissions

This section addresses the key issues raised in the received submissions. The following subheadings present the issues according to the categories outlined in **Section 2.2**. Each section details the relevant stakeholder, their relevant issue, a summary of the project response and a reference to where that issue is covered in the detailed documentation, as relevant.

### 4.1 The Project

#### 4.1.1 Urban Design and Amenity

##### Privacy

###### Issue

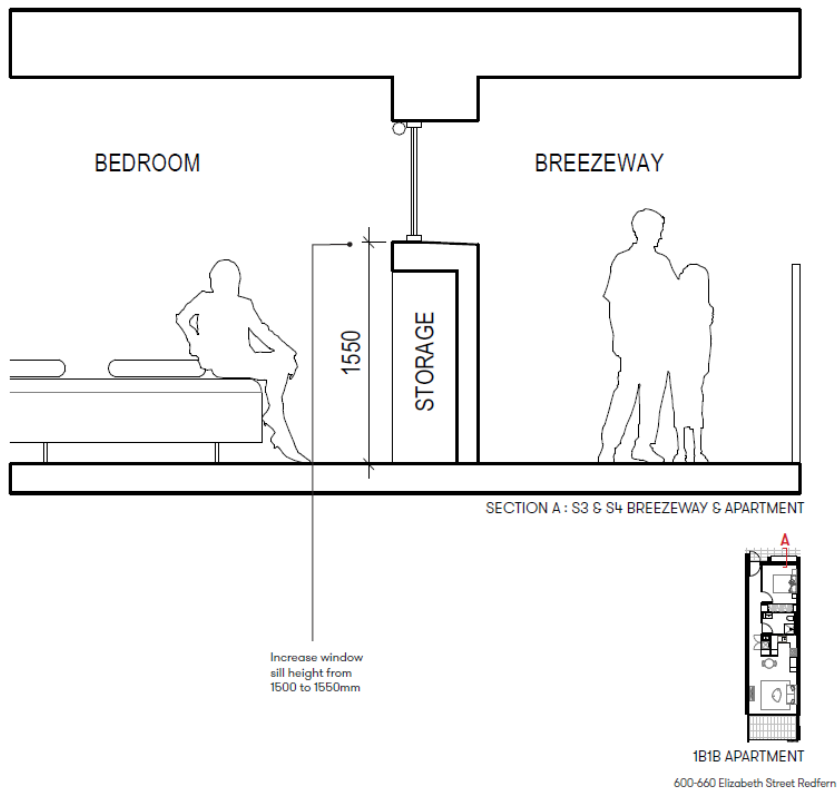
The DPHI Key Issues Letter, Agency submissions and the public raised concerns about the privacy of bedrooms that directly adjoin the proposed breezeways, as well as potential overlooking from Building S3's breezeway into adjacent apartments.

###### Response

In response, the bedroom windowsill heights for Buildings S2, S3, and S4 have been increased from 1,500mm to 1,550mm (refer to **Figure 2** and **Figure 3**). Ground floor studios in Building S2 will retain a sill height of 1,200mm to ensure adequate natural light and ventilation. For Building S2, an external shelf will be maintained at 1,200mm to allow for personalised treatments, such as pot plants, which contribute to soft separation and resident ownership of the space.

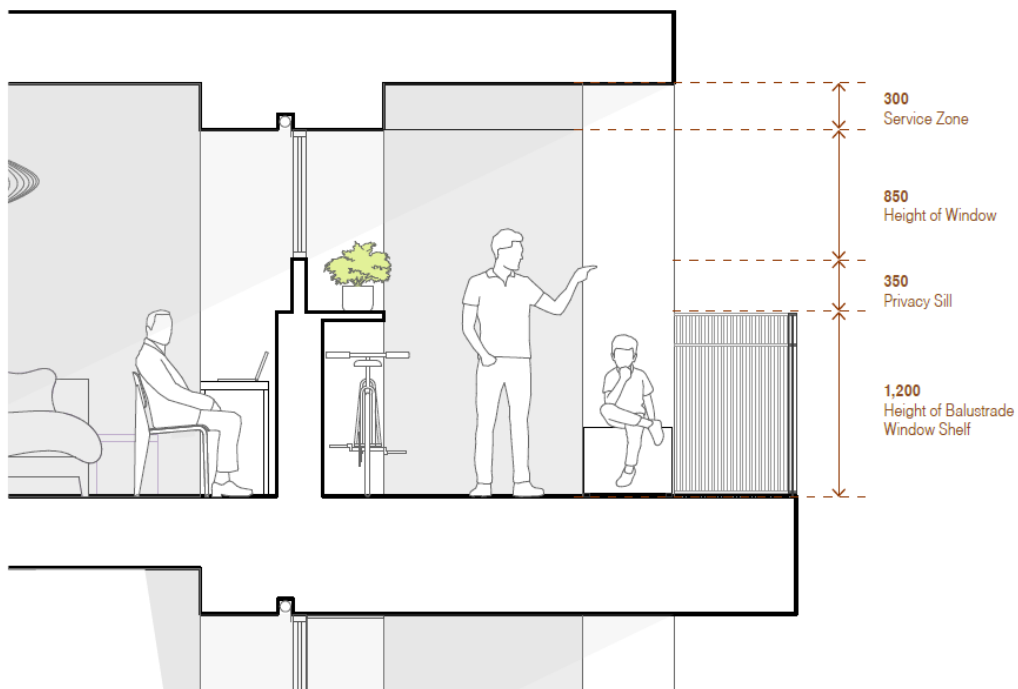
For Building S2, integrated blinds and an internal furniture zone, such as space for a desk or storage, are provided adjacent to these windows, providing additional privacy for residents. Further detail is provided in the Design Report Addendum at **Appendix E**.

Window hoods have been introduced to a bedroom window fronting the central courtyard on the southern wing of the S3 building (Levels 1-3). The window hood will provide greater privacy from potential overlooking from the S3 breezeway. A comparison between the lodged and amended window treatment is provided in **Figure 4** and **Figure 5**.



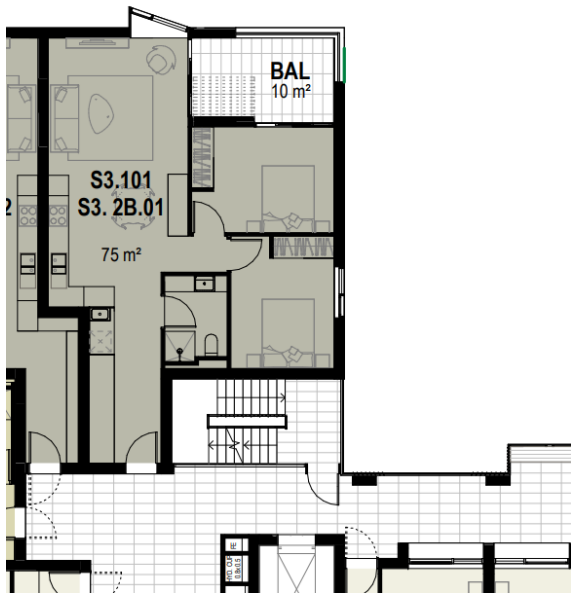
**Figure 2** Buildings S3 and S4 addendum windowsill heights

Source: Hayball, Architecture AND, Silvester Fuller



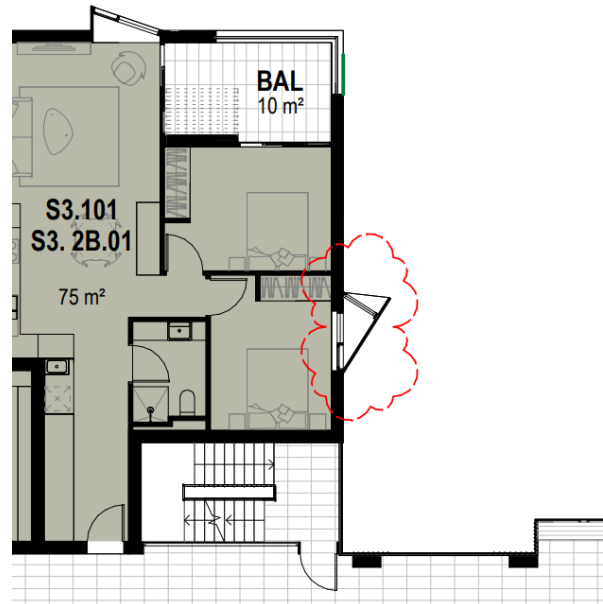
**Figure 3** Building S2 addendum window heights

Source: Hayball, Architecture AND, Silvester Fuller



**Figure 4** Extract of Level 1-3 plan showing window interfacing with breezeway (lodged)

Source: Hayball



**Figure 5** Extract of Level 1-3 plan showing proposed hooded window treatment interfacing with breezeway

Source: Hayball

## Footpaths

### Issue

The DPHI Key Issues Letter and Council sought clarification on the footpaths along Philip and Elizabeth Streets, noting they should be upgraded to meet the appropriate public domain condition in line with the City of Sydney's guidelines. Further, it was noted that the footpaths on Walker Street and Kettle Street should be retained in their existing condition as they have been recently upgraded.

### Response

In response, the footpaths along Phillip and Elizabeth Streets be updated to include a new concrete kerb and gutter and in situ concrete Type "A", maintaining consistency with the surrounding streetscape and contributing to a visually cohesive public realm.

Additionally, the footpaths on Walker Street and Kettle Street have been retained in their existing condition, as they were recently upgraded. Further detail is provided in the Design Report Addendum at **Appendix E**.

The final detailed design of the footpaths will be determined in collaboration with Council's public domain team post approval and in accordance with the Voluntary Planning Agreement to be executed between the Applicant and Council.

## Cross Ventilation

### Issue

Council has provided a recommendation that units which do not achieve cross ventilation should be fitted with ceiling fans.

### Response

Ceiling fans are proposed to be provided to all apartments (bedrooms and living rooms).

## Noise

### Issue

Council noted the design of the proposed vertical plenums is narrow at only 65mm and that the quantum of airflow through this plenum is unlikely to achieve the City of Sydney's Alternative natural ventilation of apartment in noisy environments (draft) which can be used as a guide.

## Response

Windtech have reviewed the plenums and advised amendments to the design which have been incorporated. Windtech confirm that the design meets the requirements in City of Sydney's *Alternative Natural Ventilation of Apartments in Noisy Environments Draft Guide*. Refer to Appendix J within the Updated Noise and Vibration Impact assessment (**Appendix S**)

## **Dwelling Mix**

### Issue

Council has recommended that where possible, additional 3+ bedroom apartments should be considered across all buildings.

### Response

The following provision of three-bedroom apartments is noted below:

- Building S2: 10 (5%)
- Building S3: 3 (3%)
- Building S4: 3 (6%)

No changes to the apartment mix are proposed as the mix reflects the need for social and affordable housing and is based on demand from Homes NSW and Bridge Housing's extensive tenant waiting lists.

## **Shade to Communal Rooftops**

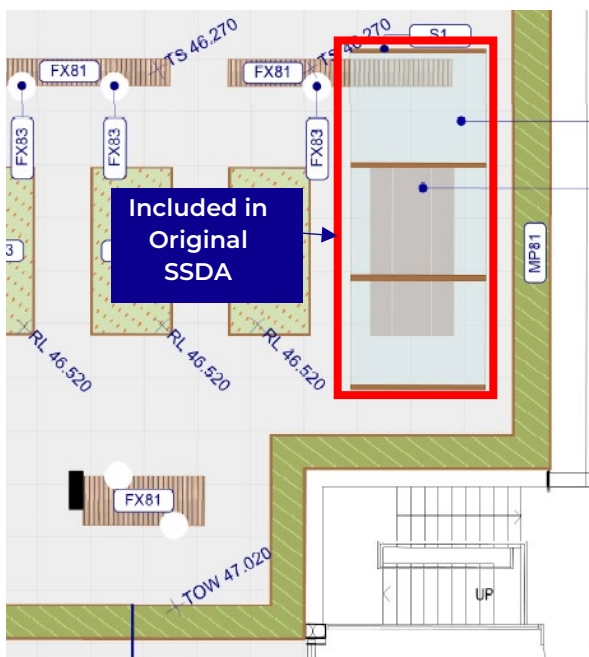
### Issue

Council noted that limited shade was provided in the rooftop communal open spaces on Buildings S3 and S4.

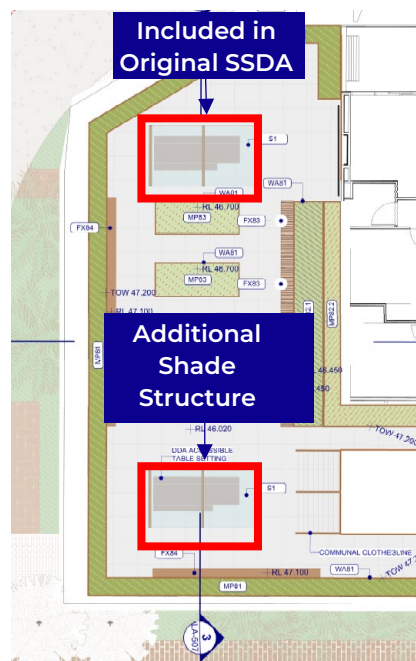
### Response

The submitted SSDA design included a large shade structure on Building S3 and one shade structure on Building S4 (as shown in **Figure 6**). To respond to Council's comment, an additional fixed shade shelter has been incorporated on the eastern portion of the rooftop of Building S4 (as shown below in **Figure 6**).

It should be noted that shaded outdoor areas were incorporated within the submitted SSDA design, partially provided by building overhangs, complemented by small tree plantings and freestanding shade elements. Further detail is provided in the Landscape Design Report Addendum provided at **Appendix H**.



Building S3 rooftop communal open space



Building S4 rooftop communal open space

**Figure 6** *Shade structures (clouded in red)*

Source: Aspect Studios

## Solar Access to Surrounding Buildings

### Issue

Concerns have been raised by the public submissions regarding the impact of overshadowing on Walker Street from the proposed development. One submission noted that while the height of Building S2 was consistent with the controls, the 30% of Walker Street that will not have 2 hours solar access as a result of the controls is a concern.

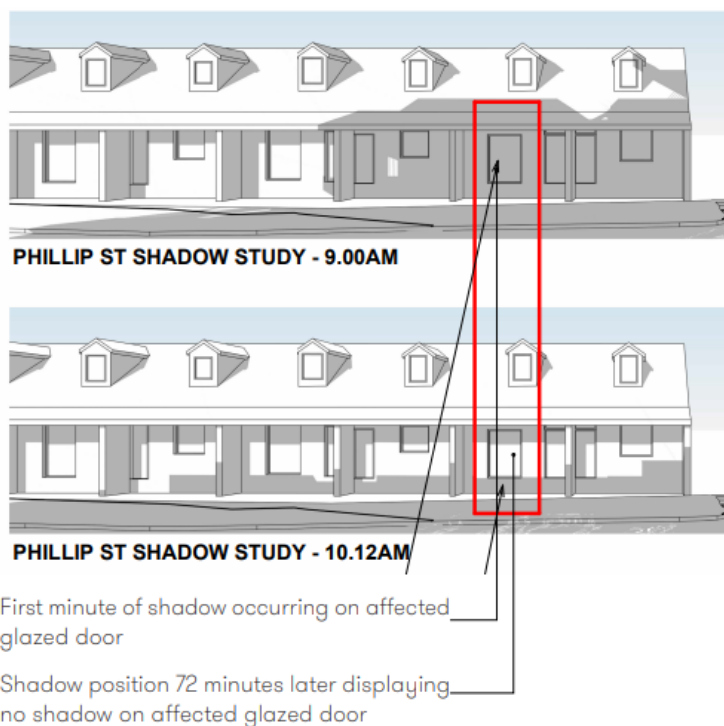
Additional concerns were noted for properties along Phillip Street, which are heritage listed.

### Response

The development has been designed to minimise solar impacts to adjoining residential properties and to Redfern Park as much as practically possible, positioning the tallest point within the north eastern portion of the site. The development complies with the approved Design Guide requirements for solar access. Specifically, 71.1% of the Walker Street boundary plane achieves a total of at least two hours of sunlight between 9am and 3pm during mid-winter. The Design Guide does not require this sunlight to be consecutive, only cumulative over the specified period, and therefore the proposal meets the relevant planning controls.

Similarly, the proposal has considered, and complies with, the site specific Design Guide requirements for solar access to the properties on Phillip Street, opposite the proposal. It is to be noted that majority of the shadow falls onto the properties on Phillip Street between 9:00am and 10:12am (during the winter solstice) and are therefore not considered to be unreasonably impacted by the proposed new building additions (as shown in **Figure 7**).

Further detail is provided in the Design Report Addendum at **Appendix E**.



**Figure 7** Shadow analysis

Source: Hayball

4.1.2     Basement Amendments

End of Trip facilities and Bicycle Parking

Issue

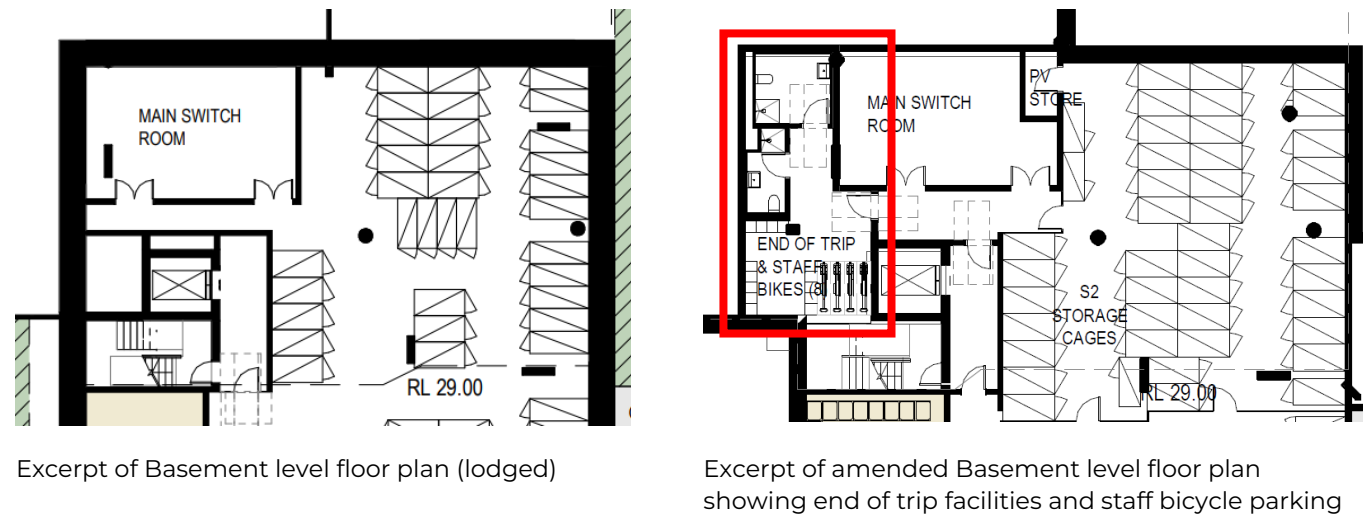
Council recommended that end of trip facilities be provided including two (2) shower and change cubicles and 13 person lockers for staff.

Further, Council also requested the bicycle parking provided for the entire site comply with AS2890.3, noting some bicycle lockers appear undersized (depth) and would not be able to securely accommodate bicycles.

Response

In response, end-of-trip facilities have been included within the revised basement plan (as shown in **Figure 8**). The facilities now include two (2) shower and change cubicles and 13 personal lockers for staff.

Bicycle parking within the basement level has been revised to comply with relevant Australia Standards, addressing parking concerns regarding the depth of lockers. The updated layout now accommodates 355 bicycle spaces for residents and eight (8) for staff. An annotated plan showing the storage cages and bike racks is provided in the Design Report Addendum at **Appendix E**.



**Figure 8     Excerpts of lodged and revised Basement Level floor plan**

Source: Hayball

Waste Room

Council provided a variety of comments related to waste management on the site. Each comment and a responses are provided in **Table 3** below.

**Table 3     Response to Council's waste related comments**

Council Request	Response
Amendments to Architectural Plans	
Provide safe and efficient access for waste collection staff with a maximum manual handling distance by City contractors of 10m. The current design requires bulky waste to be transferred 30m.	The waste collection process has been refined to ensure that manual handling distances for City contractors do not exceed 10 metres. As such, the residential bulk storeroom has been relocated, and the door to the communal waste room has been moved closer to the loading bay.
Waste management systems and facilities are to promote safe and convenient access for all users including residents, building management and waste collectors. Access pathway from vehicle to waste storage area and structural beams within the storage area impede the safe and efficient collection of 1,100L waste bins.	The waste room has been reconfigured to minimise structural column obstructions, ensuring a clear access pathway from the designated loading area to the waste storage area.
Adequately sized waste storage areas, sized to accommodate predicted waste and recycling generation as per the rates	The Building S2, S3 and S4 waste storage areas have been resized to provide two days storage of waste in

Council Request	Response
within Reference A of the guidelines. S2, S3 and S4 residential waste rooms are to be adequately sized to provide two days storage of waste in 240L bins.	240L bins. Refer to the Basement Level floor plan provided at <b>Appendix C</b> . An annotated Basement Level floor plan is provided below in <b>Figure 9</b> .
The location and space allocated for waste and recycling bins including the required number of bins drawn to scale (240L, 1100L) and proposed layout within waste storage areas.	Provided. Refer to the Basement Level floor plan provided at <b>Appendix C</b> . An annotated Basement Level floor plan is provided below in <b>Figure 9</b> .
In line with Greenstar objectives, provide a dedicated space for food organic bins and a resident accessible space for the collection of tricky to recycle items collected as part of Councils Doorstep Recycling service.	Designated areas have been allocated for food organics (FOGO) bins. An annotated Basement Level floor plan is provided below in <b>Figure 9</b> that shows the proposed location of FOGO bins.
Allocate designated space for the secure storage and charging of bin tug and trailer and location of the bin lifter for decanting 240L bins into 1,100L bins.	Space has been allocated for bin tug, trailer and bin lifter. Refer to the Basement Level floor plan provided at <b>Appendix C</b> . If required, charging for the bin tug will be provided. An annotated Basement Level floor plan is provided below in <b>Figure 9</b> .
<b>Waste Management Plan Updates</b>	
Detail bin allocations and a waste management system that restricts resident access to 1,100L bins.	These recommendations are achievable as detailed in the Amended Operational Waste Management Plan at <b>Appendix Q</b> .
Residents will dispose of waste in 240L bins to be decanted by building managers with a bin lifter into 1,100L bins that are to be presented for collection.	
The waste generation estimates in the waste management plan may be updated to allow for twice a week collection of residential general waste.	
The residential bin holding room should be shown to be able to accommodate 21 x 1,100L general waste and 42 x 1,100L recycling bins plus a bin lifter.	A combined residential central waste room has been provided and is shown in the Basement Level floor plan provided at <b>Appendix C</b> .
Any reference to bin towing attachments and brackets should be removed from the waste management plan due to the damage caused to Council bins. A bin moving device and flatbed trailer is recommended.	Noted. Refer to Amended Operational Waste Management Plan at <b>Appendix Q</b> .
Section 10.0 Waste Rooms to confirm number of 240L bins required for two days collection at each core and the final number of 1,100L bins consolidated in the main waste holding area.	The residential waste rooms have been increased in size to ensure adequate capacity for two days storage of waste in 240-litre bins.
<b>Other requests from Council</b>	
Confirmation that the waste truck loading area provides sufficient space to facilitate standard, safe and efficient collection of bins;	The basement has been designed to accommodate a 10.6m waste truck, as required for servicing by the City's waste contractor. The swept paths included in the lodged Transport Assessment show there is sufficient space for the truck to move forward while still allowing cars to pass when entering or exiting the basement. The space provided is more than adequate to facilitate standard, safe, and efficient collection of bins. Refer to the Transport Letter prepared by Ason at <b>Appendix R</b>
Further detail (via a section) be provided showing the basement head height area directly to the rear of the waste truck loading bay; and	A detailed section showing the impact of the low head height area directly to the rear of the waste truck loading bay is provided in <b>Figure 10</b> and in the Design Report Addendum at <b>Appendix E</b> . Further, levels and clearances are now clearly shown on the Clouded Consolidated Updated Architectural Plans at <b>Appendix C</b> .

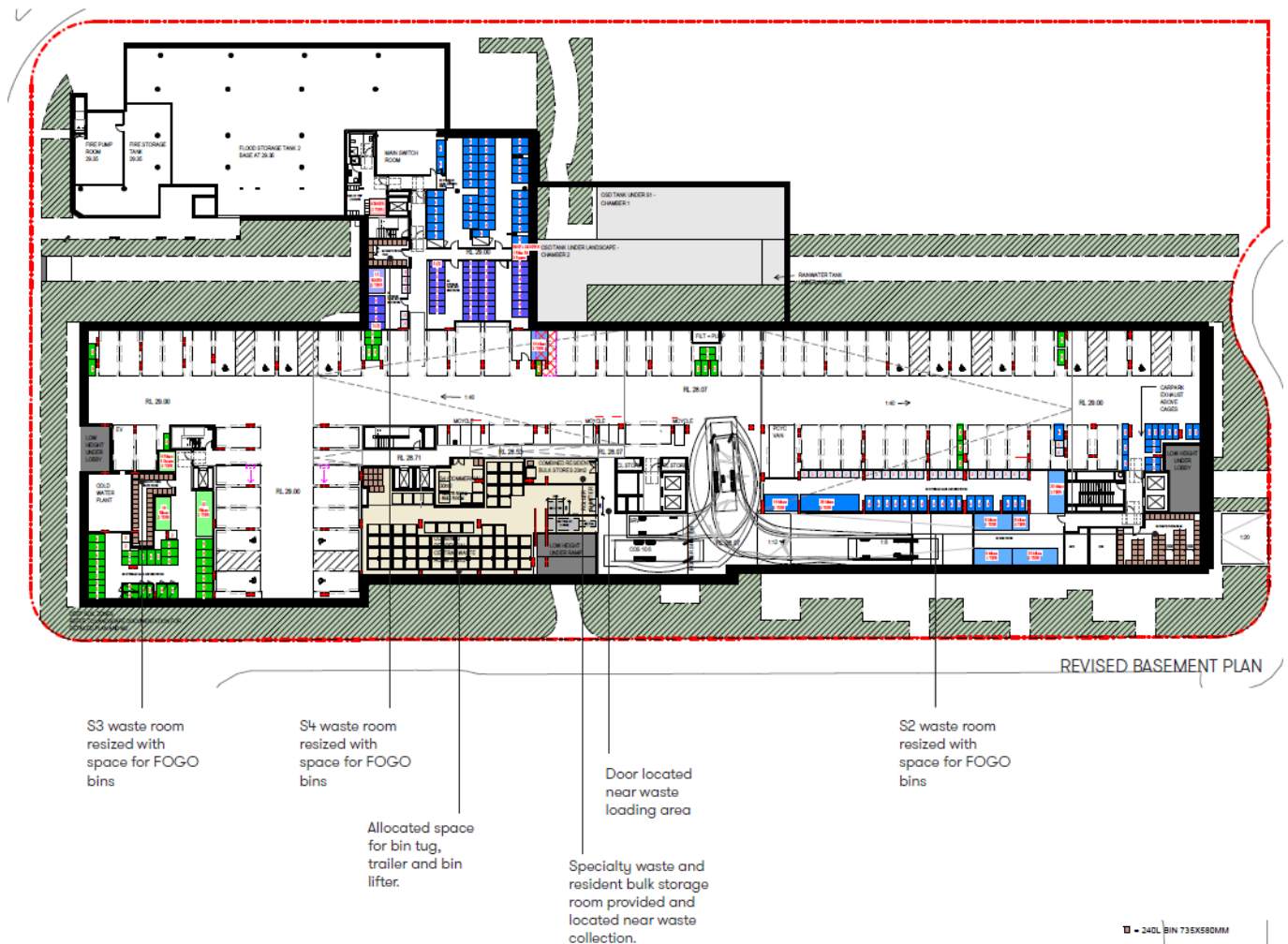
## Council Request

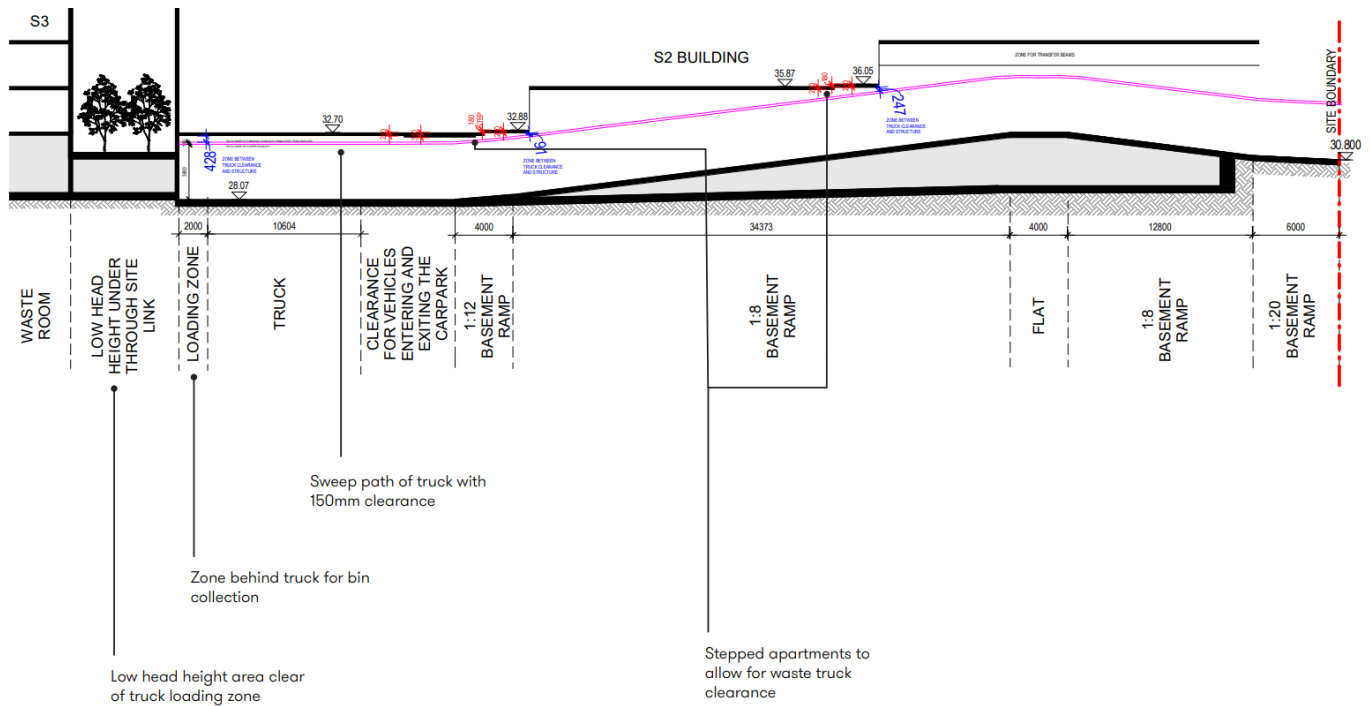
Walker Street apartments to be provided access to communal waste room so that separate collection is not required.

## Response

It was noted in the meeting held with Council that the proposal for the Walker Street apartments is to be provided with street collection for convenience reasons given they are not connected to the building's basement but can access the basement via the common building entry. The waste collection would be similar to that of the existing collection on the eastern side of Walker Street. Each terrace has a dedicated bin storage area so that the bins can easily be wheeled to the street.

Further detail is provided in the Amended Operational Waste Management Plan at **Appendix Q**.





**Figure 10** Section showing basement ramp and vertical clearances

Source: Hayball

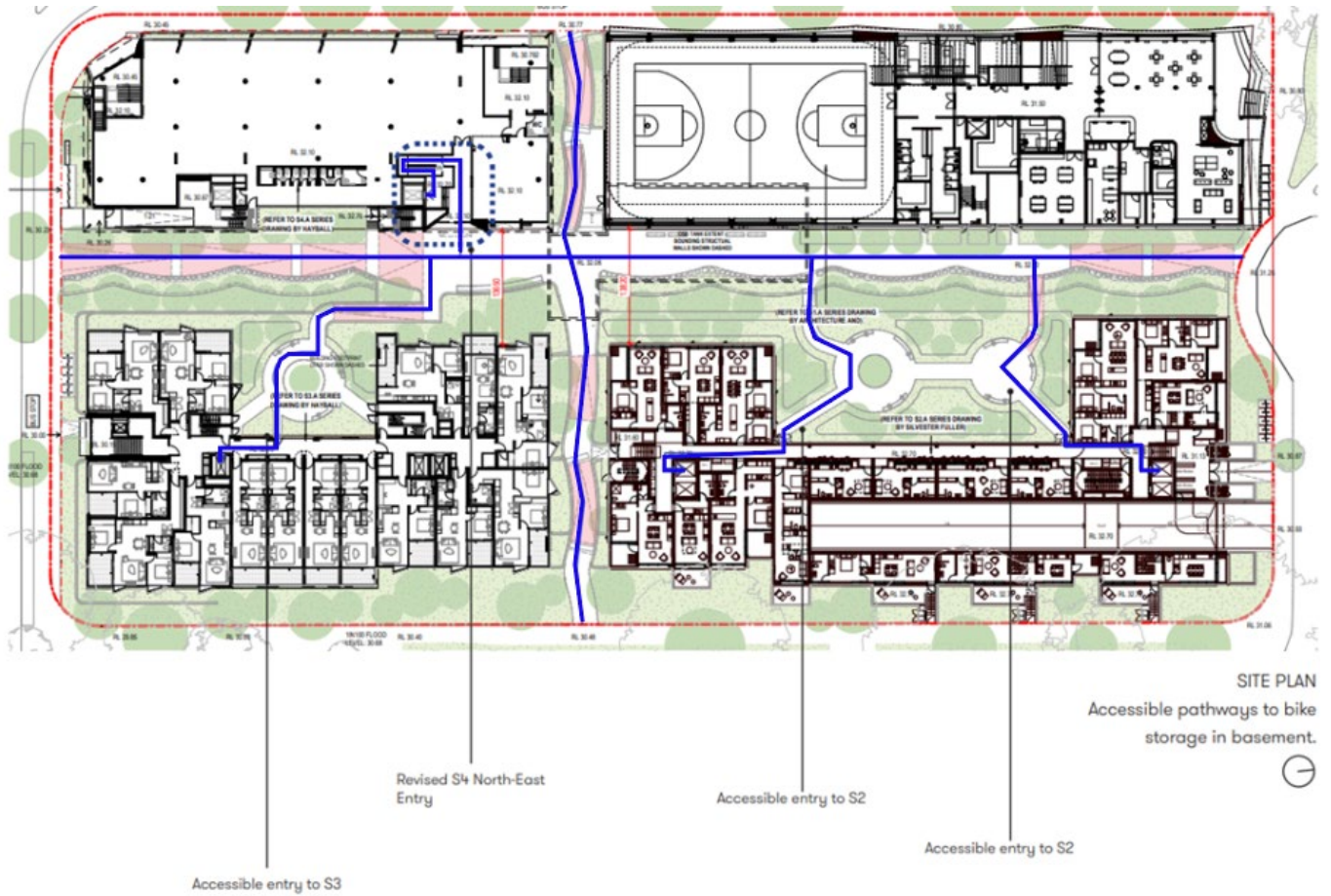
### 4.1.3 Bicycle Access

#### Issue

Council raised concerns that there were certain lobbies where an accessible path of travel to the basement that could be navigated with a bicycle is not provided.

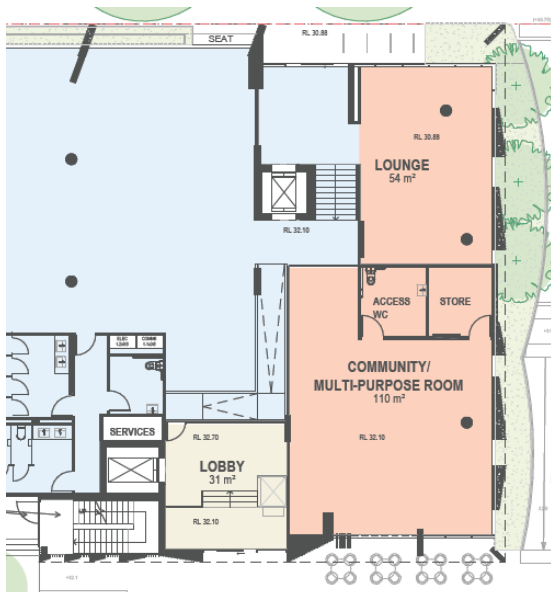
#### Response

Accessible paths of travel (with a bicycle) are identified in **Figure 11** and provided in the Design Report Addendum at **Appendix E**. As noted in the Transport Letter prepared by Ason at **Appendix R**, all access paths to and from lobbies provide travel path widths between 1.6m and 1.9m and comply with the minimum access path widths as detailed in AS2890.3:2015. The Building S4 northeast lobby has been redesigned to improve ramp access to the lift, ensuring access for all users, including Bridge workplace occupants, Building S4 residents, and PCYC staff. Additionally, the lobby has been raised to align with the level of the community lounge, improving access to key shared areas such as the reception, interview rooms, and the community room. These revisions are illustrated in the revised Ground Level floor plan (extract provided at **Figure 12**).

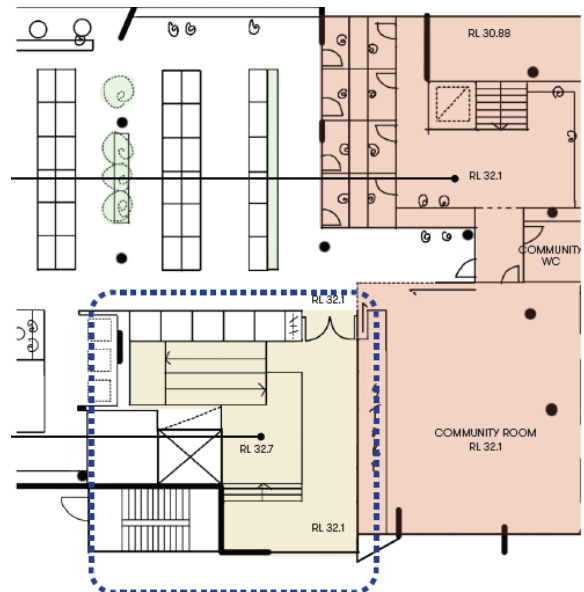


**Figure 11** Accessible pathways to bike storage in basement (outlined in blue)

Source: Hayball



Lodged Building S4 north eastern lobby



Revised Building S4 north eastern lobby

**Figure 12** Excerpts of lodged and revised Ground Level plan

Source: Hayball

#### 4.1.4 Landscaping

##### Deep soil

###### Issue

Concerns were raised by Council regarding the provision of adequate soil depths, particularly the minimum planter depth of 800mm required to support healthy plant growth on-structure.

###### Response

In response, the Landscape Plans provided at **Appendix G** have been updated to ensure there is sufficient soil volume in accordance with Council's soil volume guidelines for the proposed small trees.

On Buildings S3 and S4, planters include edible species which require soil depths ranging between 300mm and 450mm, which is appropriate for their root systems and supports the productive landscape intent of these spaces.

#### 4.1.5 Parking

##### Vehicle Parking

###### Issue

Concerns were raised by the public about the adequacy of the 66 proposed car parking spaces, given the number of residential units, staff, and nearby commercial uses and will put pressure on the provision of local parking around the site.

###### Response

No amendments are proposed to the provision of car parking. The quantum is in accordance with the maximum car parking rates as identified by Clause 7.5(1)(b) of the City of Sydney LEP 2012 and the Apartment Design Guide (ADG). The Transport Assessment submitted with the original EIS concluded that the parking supply is appropriate and supported having regard to the site's highly accessible location and known travel mode share of the area with a range of high-frequency public transport services in close proximity (both existing and near future services). Any such minor and infrequent residential visitor, commercial and PCYC parking demand can be accommodated on-street in the precinct.

#### 4.1.6 Public Art

###### Issue

The submission from Council requests a public art plan or preliminary public art strategy. Council also welcomes the opportunity to consult on the preparation of the public art plan for the development.

###### Response

In response, it should be noted that the Applicant along with PCYC will explore opportunities for public art in the future as funding becomes available.

The Applicant is committed to facilitating ongoing art programs with tenants, particularly given the community space that is proposed, and will manage ongoing art displays (particularly tenant-led community art).

### 4.2 Procedural Matters

#### 4.2.1 BDAR Waiver inconsistency

###### Issue

The DPHI Key Issues Letter and DCCEEW requested an updated request to waive the need to prepare a Biodiversity Development Assessment Report is provided. The updated waiver was required as the lodged drawings indicated a different development footprint to what was assessed as part of the BDAR waiver that was previously issued and which has implications on the trees in the south-western corner of the site, which require removal.

###### Response

In response, an updated BDAR request (provided at **Appendix O**) has been issued to DCCEEW via the DPHI and is awaiting formal acceptance. It should be noted that the BDAR request envisages the removal of four (4) trees on Walker Street. Following receipt of the submissions and noting it is Council's preference to retain the Walker Street (if possible), a peer review of the Arboricultural Impact Assessment was undertaken and confirmed that the trees could be retained. While the BDAR waiver request does not reflect the retention of the trees, it effectively assesses the 'worst case' with the trees being removed, and still concluded that the development would not have a significant impact upon biodiversity values. It is for this reason, that we consider the waiver request to remain valid.

## 4.2.2 Voluntary planning Agreement

### Issue

The DPHI Key Issues Letter and Council have highlighted that the Design Guidelines require the dedication of land on Elizabeth and Phillip Streets for the purpose of footpath widening and the creation of an easement for public access along the north-south through-site link. The City suggested that the Applicant (with consent of the landowner) enter into a Voluntary Planning Agreement (VPA) to ensure the terms of the land dedication and its embellishment, and the creation of easements are well defined.

### Response

A Draft Letter of Public Benefit Offer has been prepared and has been submitted to Council for their review. It is also provided at **Appendix M**. It seeks to offer Council the following:

- The dedication of land along Elizabeth Street and Phillip Street, with improvements in accordance with Council's public domain requirements. The land to be dedicated is as per Figure 4: Local Infrastructure in the Design Guide which specifies:
  - 2m width on Elizabeth Street;
  - land at the intersection of Elizabeth and Phillip Streets having a maximum internal radius of 12.5m with a minimum dimension at the corner of 4.3m; and
  - 1.2m width on Phillip Street.
- Easements to allow for public pedestrian access through the site:
  - North/south from Kettle Street to Phillip Street; and
  - East/west from Walker Street to Elizabeth Street.

## 4.2.3 Contributions

### Issue

Council noted in their submission that they would support the minimum application of development contributions in accordance with the City's Development Contributions Plan 2015, noting the provisions of circular D6 may apply in the circumstances.

### Response

It is noted that the City of Sydney Development Contributions Plan 2015 applies to the site. Under Section 1.3 of the Plan, the proposed development is excluded from the need to pay a contribution given the community use will be operated by PCYC and the commercial use will be operated by Bridge Housing, both of which are organisations that are charitable and community focussed and will accommodate the needs of the residents on the site and the local community.

## 4.3 Economic, Environmental and Social

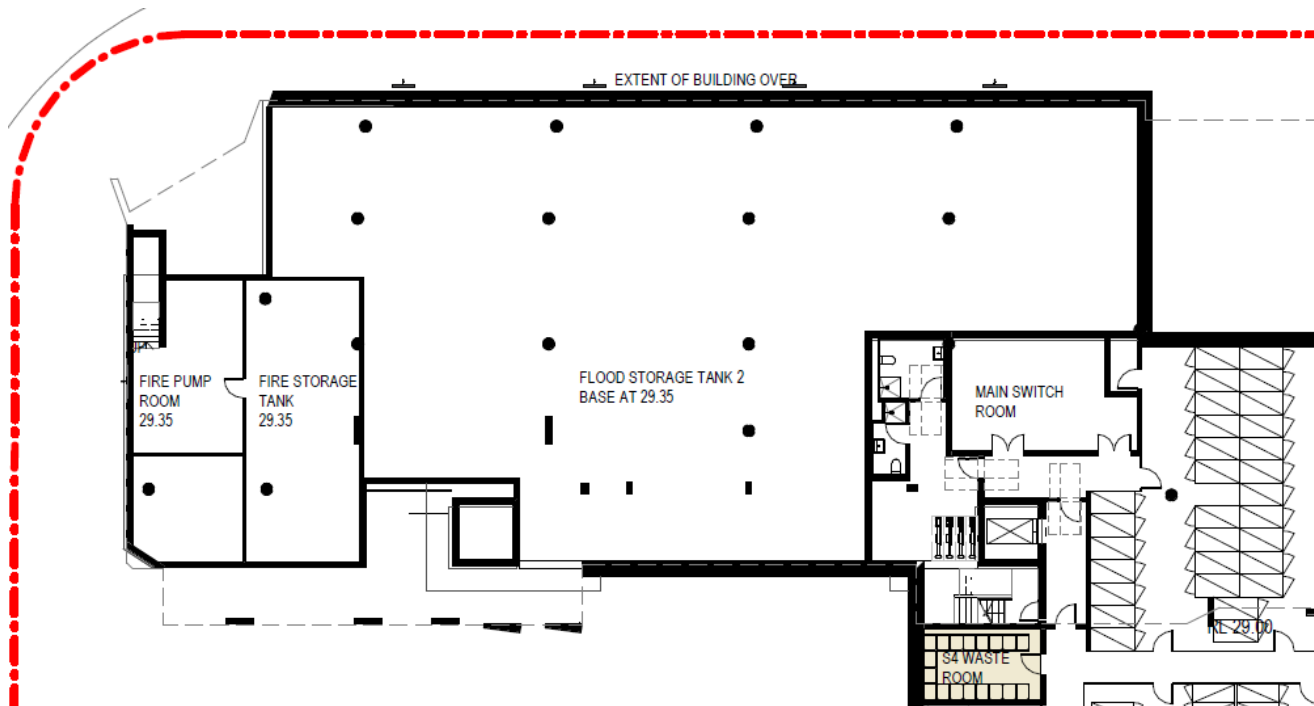
### 4.3.1 Flooding and Stormwater Management

DPHI and DCCEEW provided feedback on flooding and stormwater management matters. All key commentary and associated responses are provided in **Table 4**.

**Table 4** *Response to flooding and stormwater management matters*

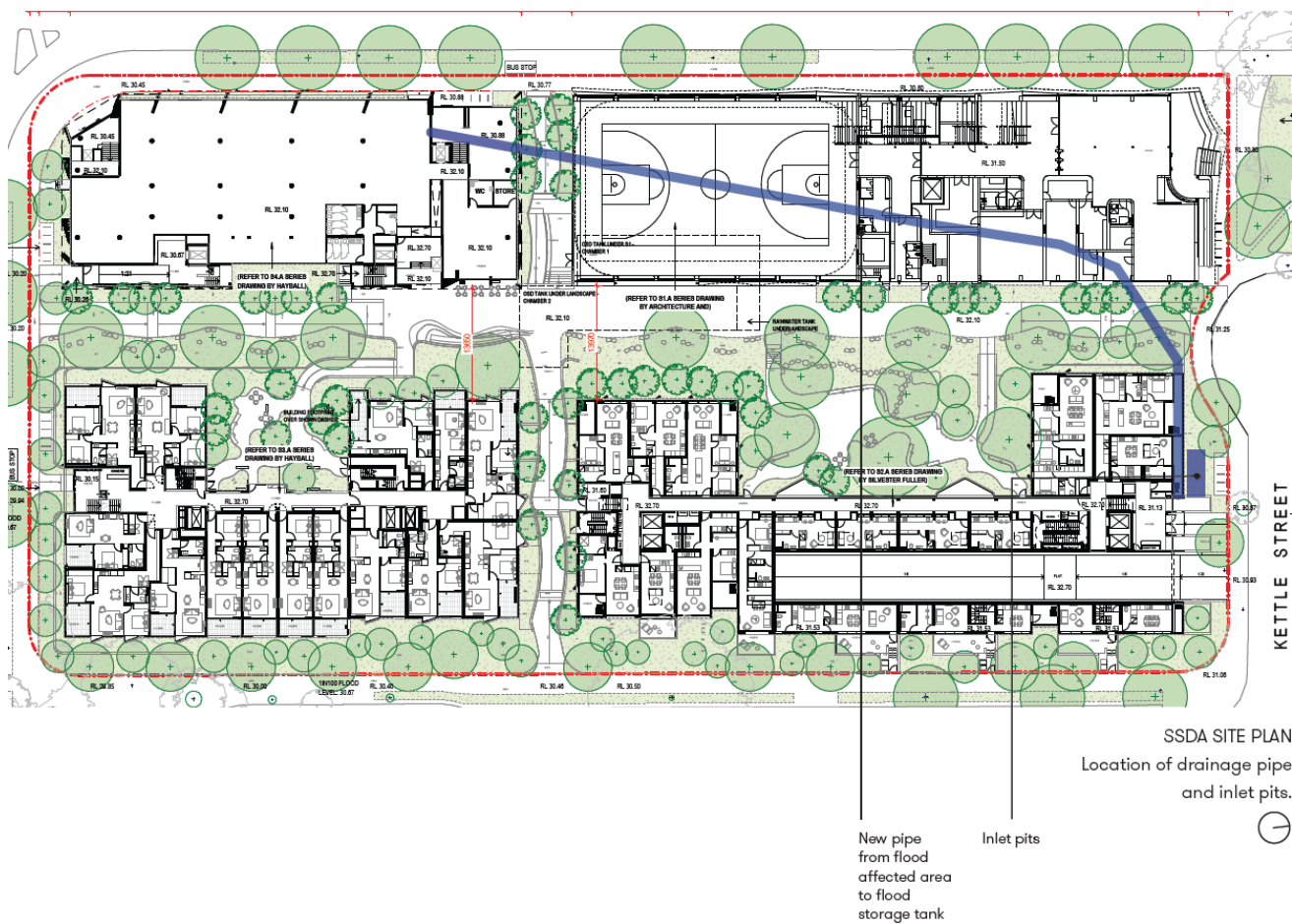
Comment	Response
<b>Department of Planning, Housing and Infrastructure</b>	
Provide an updated Flood Assessment and Civil Plans addressing City of Sydney Council's and the Biodiversity Conversation and Science Group's submissions	Refer to the following updated documentation prepared by BG&E: <ul style="list-style-type: none"> <li>Flood Assessment Report (<b>Appendix K</b>);</li> <li>Civil Plans (<b>Appendix I</b>); and</li> <li>Stormwater Report (<b>Appendix J</b>).</li> </ul>
Update the Civil Plans and details to include the rainwater tank referenced in the Architectural Plans and ESD Report, and to include sections and details of the proposed flood storage tanks	
<b>Department of Climate Change, Energy, the Environment and Water</b>	
<p>The proposal includes compensatory flood storage under the PCYC building with louvres for water ingress and egress, as well as a smaller flood storage basin near the waste storage area. However, the mechanisms for water entry and drainage in the latter location are unclear.</p> <p>Risk to life if people are caught against or in flood storage areas under or within buildings have not been addressed. Flood storage under and inside buildings is not considered a suitable mitigation measure and may lead to ingress of water into basements. Other risks include, but are not limited to, difficulty in draining given reliance on deep stormwater pit in Elizabeth Street, hazards due to depth of water stored, blockage of inlets causing storage not to be effective, potential to trap litter and other contaminants and hazards to personnel required to maintain the area.</p> <p>The storage provided is also considered to not adequately mitigate the impacts of the development. This is demonstrated by the unacceptable increases in water depth which are shown in the public roadway post development. Offsite impacts on other property and public assets such as roadways are not acceptable particularly when an increase in hazard or redistribution of flows occurs. The flood modelling has clearly indicated that both will occur post development.</p> <p>Please revise flood mitigation strategies to address risks of water ingress, drainage challenges, litter accumulation, and maintenance and safety hazards.</p>	<p>Amendments have been made to the proposed flood storage. The stormwater design includes the provision of a rainwater tank adjacent to the OSD tank. The rainwater tank will collect water from adjacent roof areas to be reused in landscape irrigation and toilets/bathrooms.</p> <p>In addition to the OSD tank, a flood storage tank located under Building S4 (refer to <b>Figure 13</b> below) is proposed to take in and retain flood waters in the event of a flood to minimise impact of the development on Elizabeth Street.</p> <p>The flood tank will take in water from Elizabeth Street through grated louvres installed against the site of the building, retaining water and slowly discharging water through the discharge pipe or the louvres, depending on the water level.</p> <p>The flood storage tank will also take flood water from the corner of Kettle St and Walker St. This will be captured using pits and conveyed to the flood storage tank under Building S4 through a Reinforced Concrete Pipe that will run under Building S1. Refer to <b>Figure 14</b>.</p> <p>Updated flood modelling has been undertaken in <b>Appendix J</b>, incorporating the amended flood mitigation measures. Compared with the existing flood behaviour, there is no increase in the levels of inundation or the flood hazard in neighbouring properties. There are some highly localised areas of increase within the site boundary and the road reserve, however internal to the site the flood behaviour is managed holistically across the site and includes a Flood Emergency Response Plan. The changes within the road reserve are extremely localised and do not alter the flood functionality of the roads.</p>
<b>Floodway Hydraulic Function Maps</b>	
The flood report does not adequately delineate hydraulic functions of floodways across the full range of flood events up to the PMF. Understanding the behaviour of floodways, including flow velocities and depths, is critical for assessing the safety and functionality of the development. Please Provide detailed hydraulic function maps of floodways, highlighting flow velocities, depths, and extents for the full spectrum of flood	The Updated Flood Assessment Report provided at <b>Appendix K</b> includes hydraulic categories for the site illustrated in flood mapping for 1%, 5%, 10% and 20% AEP events provided at Appendix A of the Report.

Comment	Response
<p>events, in compliance with the 2023 NSW Government Flood Risk Management Manual. Use these maps to confirm that floodway conveyance is maintained post-development for the full range of events.</p>	
<b>Off Site Impacts and Public Safety</b>	
<p>Flood modelling indicates increased water depths on public roadways post-development, leading to higher flood hazards (H2 and H3) in some areas. Redesign mitigation strategies to eliminate significant increases in flood levels on public roadways, as public roads are critical evacuation and emergency access routes.</p>	<p>The updated Flood Assessment Report notes that where there are increases in the hazard category, they only occur in localised cells in areas approximately less than 10m<sup>2</sup>. Where the increases occur, the increase in velocity depth product is approximately less than 0.05m<sup>2</sup>/s and there will be no increase in flood hazard on neighbouring properties.</p> <p>Flood Emergency Response Plans (FERPs) have been developed for the residential, PCYC and commercial uses which detail the potential evacuation routes, proposed on site signage, responsibilities of buildings owners, access to areas above the PMF level, potential evacuation routes, the flood emergency plan features and procedures. Refer to <b>Appendix L</b>.</p>
<p>Significant impacts are impacts greater than 10 mm, which corresponds to the generally acknowledged level of accuracy for flood models to detect impacts. For extreme events, larger impacts may be acceptable on a merits basis if justified. Any change in flood levels should be evaluated alongside changes in hazard categories for the full range of flood events.</p> <p>For any locations where significant impacts are proposed, an investigation is to be conducted to confirm that existing buildings, public infrastructure, and uses will not be adversely affected.</p>	<p>The Updated Flood Assessment Report notes there will be increases to flood levels up to 32mm which will only occur in the road corridors. No flood increases will occur on neighbouring properties.</p>
<b>Structural Design Concerns</b>	
<p>High-hazard flooding, for example &gt;2 m deep in Phillip Street during the PMF, presents risks to structural integrity. Please ensure structural designs comply with standards for flood loads up to the PMF.</p>	<p>Noted. Certification from a qualified engineer will be sought to confirm the structural design, as per the relevant Australian Standards, has structural integrity for immersion and the impact of the hydraulic forces of floodwaters and debris up to the PMF. Refer to <b>Appendix L</b>.</p>



**Figure 13** Additional flood storage underneath Building S4

Source: Hayball



**Figure 14** Location of drainage pipe and inlet pits

Source: Hayball

## Flood Emergency Response Plans

### Issue

DCCEW and Council requested a comprehensive flood emergency response plan be developed to assess emergency issues related to storms up to and including the PMF. DCCEW also noted that one residential unit lacks access to shelter above the PMF level.

### Response

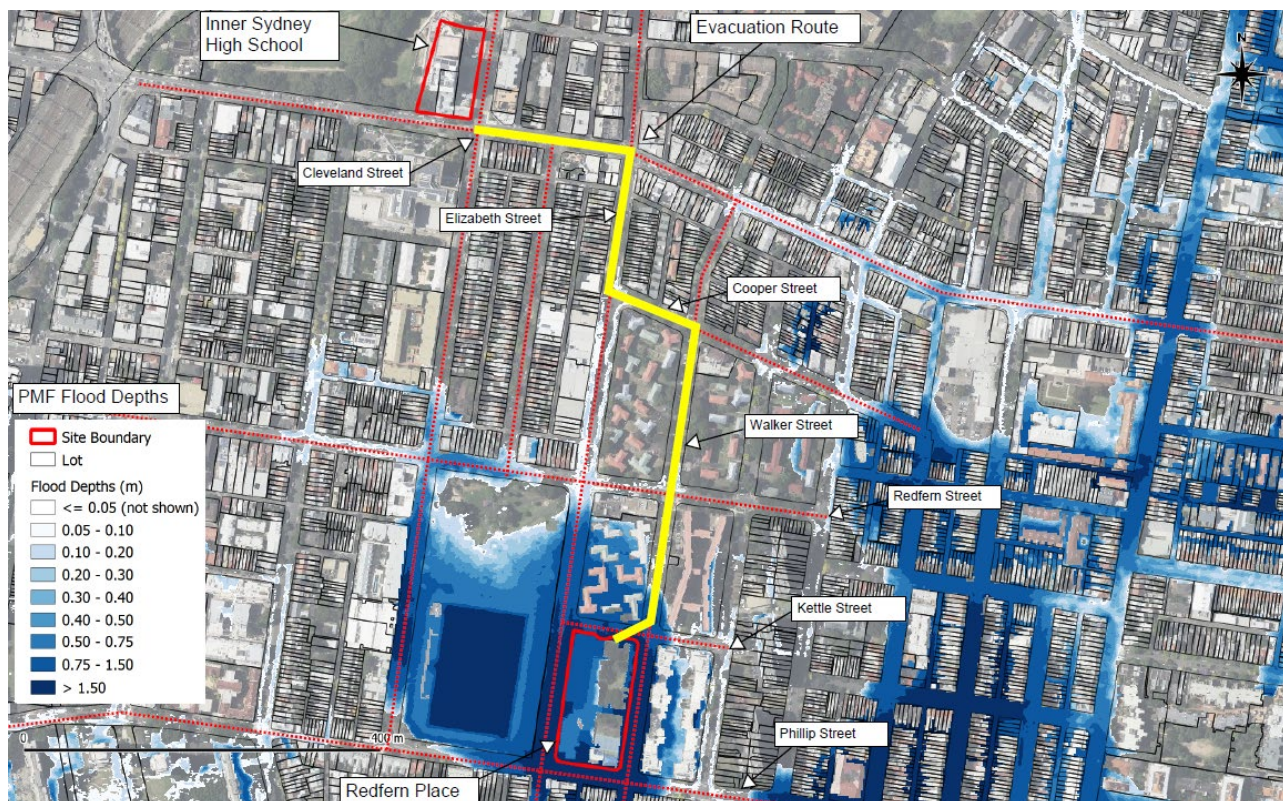
In response, the floor level of all residential apartments on Walker Street have been lifted to RL32.7 to be above the PMF, ensuring the residents can safely shelter in place if required, with full access to their entire homes provided (noting previously the levels of three terraces with access from Walker Street were positioned below the PMF). In doing this, all residences are now located completely above the PMF to safely shelter in place without risk of damage to life or property.

Flood Emergency Response Plans (FERPs) have been prepared for the residential component, Building S1 (PCYC) and the commercial uses (refer to **Appendix L**). All FERPs confirm there is an evacuation path through the site to Kettle Street and onwards towards the Inner Sydney High School that has a flood hazard classification of H1 (generally safe for people, vehicles) in events up to and including the 0.2% AEP event (refer to **Figure 15**). In storms larger than the 0.2% AEP event such as the Probable Maximum Flood (PMF) a Shelter-in-Place strategy is adopted due to the faster rate of rise of flood waters that occurs surrounding the development. The fastest rate of rise occurs at the southern end of Walker Street and Phillip Street where it takes approximately 12 minutes for flood depths to reach 0.5m and 20 minutes for flood depths to reach 1.2m. Given the rate of rise, evacuation during events such as the PMF is not feasible, particularly for vulnerable tenants who may have mobility impairments.

Ultimately, the FERPs conclude the following in relation to the Shelter-in-Place strategy:

- All the residential occupants of the development have access to areas above the PMF level internally within their apartments;
- All the occupants of the PCYC have access to areas above the PMF on Levels 1 and 2; and
- All occupants of the Building S4 commercial office will have access to areas above the PMF via access to the Level 1 and Level 2 of the PCYC community facility.

The time to Shelter in Place if evacuation is not achieved at the start of the rainfall event in the PMF is a maximum of 14 hours for all proposed buildings within the site.



**Figure 15** Evacuation route

Source: BG&E

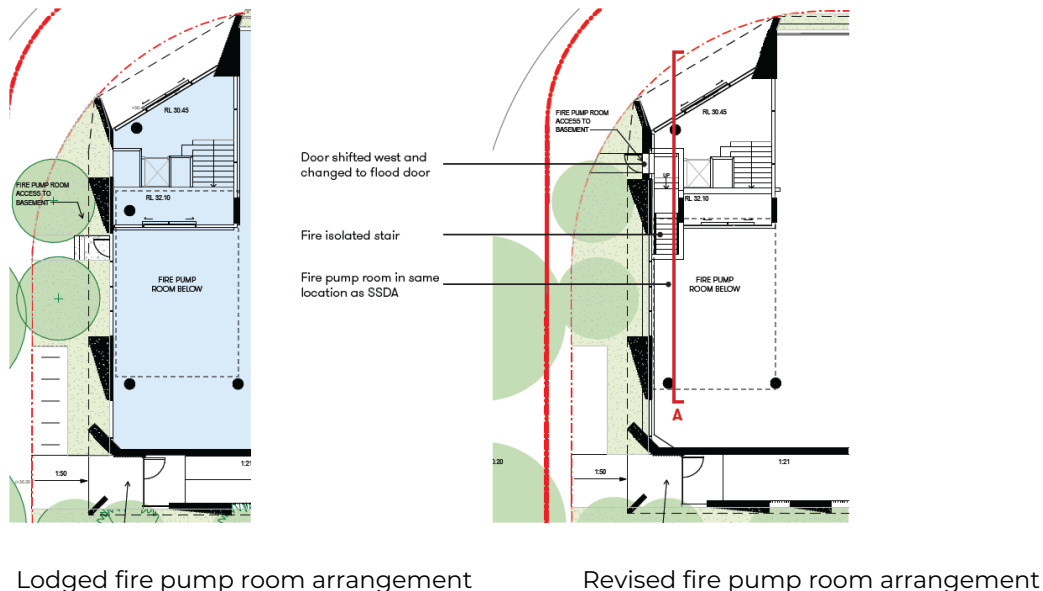
## Protection of the Fire Pump Room

### Issue

DCCEEW identified that the fire pump room is located below the 1% AEP level and is vulnerable to failure during flood events, which could have critical consequences to the fire pump room infrastructure.

### Response

In response, to ensure the room is protected in a 1% AEP flood event, the fire pump room entry stairs have been relocated and a flood door has been introduced located at the 1% AEP flood level, noting access is not required to the fire pump room during a flood event. A comparison of the submitted and revised fire pump room arrangement is provided in **Figure 16**. Further detail is provided in the Design Report Addendum at **Appendix E**.



**Figure 16** Comparison of lodged and revised fire pump room arrangement

Source: Hayball

## 4.3.2 Wind

### Issue

The DPHI Key Issues Letter and the public submissions raised concerns about the wind impacts of the proposed development. It has been recommended that the wind environment for private balconies/terraces, rooftop communal open space, and breezeways is assessed, and relevant mitigation measures are provided.

### Response

An Updated Pedestrian Wind Environment Study has been prepared by Windtech and is provided at **Appendix P**. The updated study assesses the wind environment and provides the below mitigation measures in relation to private balconies/terraces, rooftop communal open space, and breezeways. It should be noted that all measures have been incorporated within the design.

- S2 Level 10 communal terrace:
  - Retain proposed perimeter planting within and around the entirety of the communal terrace, ensuring the combined total height of the physical planter box and foliage is 1.5m;
  - Retain the proposed tree planting within and around the entirety of the communal terrace space, ensuring they have interlocking canopies where applicable (retain size as per landscaping drawings received 26 February 2025);
  - Introduce 1.2m high impermeable perimeter balustrade for sections of the communal terrace perimeter which do not have perimeter planting;
  - Retain 1.5m high planter box or impermeable wind screen between columns in the southern portion of the terrace;
  - Introduce 1.5m high impermeable wraparound perimeter balustrade at the south-western corner of the north-western section of the terrace; and

- Introduce an impermeable wind screen between the BBQ/outdoor kitchen benches in the family plaza, ensuring a total height of the wind screen and BBQ/outdoor kitchen bench is 1.5m from the slab level.
- S3 Level 4 communal terrace:
  - Retain proposed perimeter planting, ensuring the combined total height of the physical planter box and foliage is 1.5m; and
  - Introduce a 1.2m high trellis on top of the proposed 800mm high edible gardens within the terrace to baffle any flow which may still enter the terrace, ensuring that the trellis has a maximum porosity of 30%. This can be achieved either via adding climbers to the trellis or by making the trellis a maximum of 30% porous on its own.
- S4 Level 4 communal terrace:
  - Retain proposed perimeter planting, ensuring the combined total height of the physical planter box and foliage is 1.5m; and
  - Introduce a 1.2m high trellis on top of the proposed 800mm high edible gardens within the terrace to baffle any flow which may still enter the terrace, ensuring that the trellis has a maximum porosity of 30%. This can be achieved either via adding climbers to the trellis or by making the trellis a maximum of 30% porous on its own.
- Open air corridors:
  - Retain full height wind screens with a maximum porosity of 30% at the northern and southern openings of Building S2 (Level 1 to Level 09);
  - Retain the proposed full height door, with a maximum porosity of 30%, that closes off the southern opening of the Level 4 open air corridor to the communal terrace in Building S3;
  - Retain proposed 1.8m high impermeable screening on the western aspect of the seating areas on the Level 5-6 open air corridors on Building S3 and on the eastern aspect of the Levels 2-4 open air corridors on Building S4;
  - Retain the proposed full-height porous screening around seating areas on Levels 5-6 of Building S3, ensuring that louvers of the porous screen are oriented so that the tips of the louvers have a south-west to north-east orientation;
  - Retain proposed full height porous screens located on the eastern aspect of the Levels 2-4 open air corridors on Building S4; and
  - Retain standard height porous balustrades within corridors in Building S4.

It is expected that these updated mitigation measures (also replicated in **Appendix B**) will ensure that the wind conditions for the development are suitable. Further detail is provided within **Appendix P**.

### 4.3.3 Trees

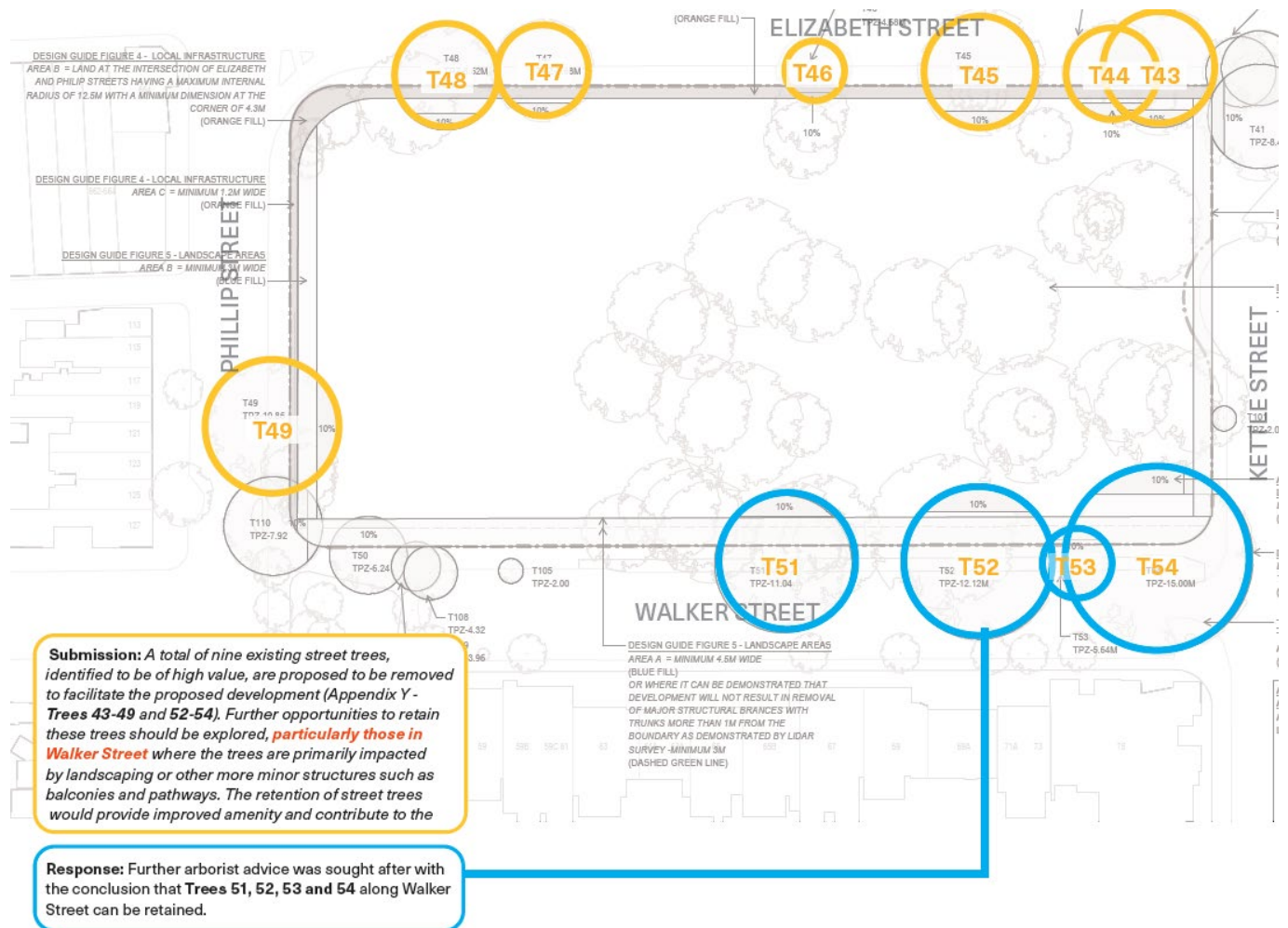
#### Tree Retention

##### Issue

Council's submission provides recommendations to retain these trees, particularly those in Walker Street where the trees are primarily impacted by landscaping or other more minor structures such as balconies and pathways.

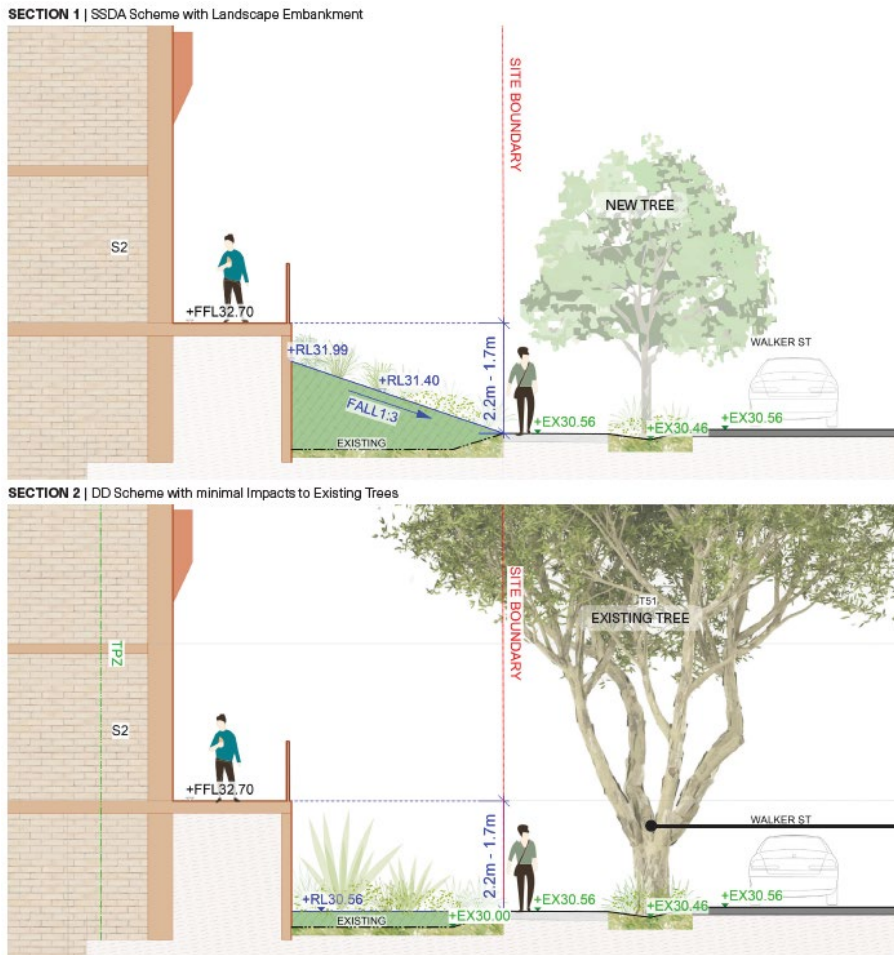
##### Response

In response, the Applicant engaged Lee Hancock Consulting Arborist to provide a peer review of the Arboricultural Impact Assessment that was prepared by Ecological Australia and was submitted with SSD-51274973. The review was undertaken to assess the potential to retain the four (4) Melaleuca quinquenervia (Paperbark) trees numbered T51, T52, T53 and T54 located on Walker Street (identified in **Figure 17**). The review confirmed that the trees could be retained given the resilience of the species noting they are typically subject to high levels of root disturbance/loss from footpath and kerb works. While the TPZs relating to Trees T51, T52 and T54 were found to be impacted by terrace elements and landscaping works to varying degrees, the Arborist Statement confirms the trees should be retained without any changes to the built form. In response to the advice provided, the Walker Street landscaping has been updated to reduce mounding and provide for understory planting to minimise the impact on the trees. A comparison of the originally proposed and amended Walker Street landscaping treatment is provided at **Figure 18**. Further detail provided in the Landscape Drawings addendum and Landscape Design Report addendum.



**Figure 17** Trees to be retained (T51, T52, T53 and T54)

Source: Aspect Studios



**Figure 18 Comparison of lodged Walker Street arrangement (top) and revised Walker Street arrangement with retained tree (bottom)**

Source: Aspect Studios

## Advanced growth trees

### Issue

Council noted in their submission that given the significant loss of tree canopy across the site, advanced growth trees must be used as replacement trees as far as possible.

### Response

In response, advanced growth trees have been nominated where possible. This has been reflected in the updated planting schedule within the Updated Landscape Plans at **Appendix G**.

## 4.3.4 Archaeological Investigations

### Issue

The DPHI Key Issues Letter, Heritage NSW and DCCEEW requests the following:

- Updated mitigation measures, including further archaeological investigations within the PCYC building footprint including photographic archival recording of the PCYC buildings;
- Update mitigation measures to require photographic archival recording of the PCYC buildings and its murals prior to demolition;
- Recommendation to collect significant items relating to the existing facility such as building plaques, signs and the like be salvaged and installed in the new PCYC;
- Preparation of a heritage interpretation plan;
- Confirmation as to whether an Archaeological Research Design (ARD) was completed prior to the 2023 archaeological excavations; and
- Confirmation of details of the 2023 archaeological excavations noting that the historical archaeological assessment cover letter describes the works as 'salvage excavation'.

## Response

In response, the following is noted:

- The mitigation measures have been updated to undertake a photographic archival recording of the PCYC building and its mural and retrieval of significant items prior to demolition and investigate the subfloor or the PCYC building during demolition (refer to **Appendix B**);
- Extent Heritage has advised that a Heritage Interpretation Plan is not necessary since the site is not identified as a heritage item.
- The archaeological excavation that was undertaken in 2023 aimed to clarify the degree of survival of archaeological remains at 11 Alderson Street and determine whether specific management procedures were required. The works were guided by the revised and updated Historical Archaeological Assessment (HAA) prepared for the contamination monitoring program in 2020. As there were no changes to the scope of works or additional research questions, the existing ARD for the site, which included detailed assessment of the whole site's potential with a range of general and specific research questions, remained appropriate and no new ARD was prepared.

The 2023 works are better categorised as an investigation of one former property that may have been the scene of activities in the past that have the potential to trigger provisions of the Coroners Act and the Health Act. Archaeological input consisted of exposure of the late-nineteenth century ground levels within the property with a potential for selective salvage.

Advice was sought from Heritage NSW regarding appropriate procedures after the site's designation as SSD. Heritage NSW have reviewed the ARD (provided at **Appendix V**) and noted the above response will be sufficient in response to the commentary regarding archaeological investigations.

### **4.3.5 Aboriginal Heritage**

#### Issue

DCCEEW has requested an ACHAR addendum that includes:

- Evidence of consultation with Registered Aboriginal Parties (RAPs) outlining the current proposed works;
- An updated impact assessment;
- An updated significance assessment; and
- Updated recommendations.

It was also requested that compliance with AHIP 4818 (DOC21/819353), specifically, Conditions 25 to 27 was achieved.

#### Response

An Aboriginal Archaeological Test Excavation Report (provided at **Appendix W**) was prepared following excavations which was sent to RAPs via email correspondence on 16 March 2022 and finalised in May 2022. This was subsequently provided to Heritage NSW and can be found on the Aboriginal Heritage Information Management System under report number 105317. Only one response was received from the RAPs, and do not indicate concerns or need for further clarification.

Correspondence from Heritage NSW provided at **Appendix X** notes that the ACHAR prepared in 2022 is sufficient to address the Secretary's Environmental Assessment Requirements (SEARs) related to Aboriginal Heritage. Recommendations in relation to Draft Conditions of Consent were also provided by Heritage NSW and are noted.

### 4.3.6 Noise and Vibration

#### PCYC Noise

##### Issue

Council's submission highlights that the acoustic report notes that the potential noise impacts from the community facility have not been assessed against the *NSW EPA Noise Policy for Industry (NPfI) Project Noise Target Limits*. It is recommended that further consideration is given to the potential noise impacts, particularly the use of public address (PA) equipment.

##### Response

In response, it is confirmed that the sound power levels for various community activities allow for periodic PA announcements at reasonable noise levels (i.e. comparable to the activity noise itself), however this would not include continuous PA use at high noise levels (e.g. music). Refer to the Updated Noise and Vibration Assessment Addendum at **Appendix S** for further details.

### 4.3.7 Construction Impacts

##### Issue

The NSW Environment Protection Authority, Council and public submissions raised concerns regarding construction noise and recommended that mitigation measures be made to minimise off-site impacts and achieve the noise management levels in the EPA's Interim Construction Noise Guidelines. It is also required that Construction activities must only be undertaken during the hours identified in Table 1 of the *Interim Construction Noise Guideline*.

Public submissions also raised the following concerns around the construction phase:

- Disruptions to the local road network from heavy vehicles and delivery trucks;
- Impacts of construction dust, particularly on nearby open terrace dwellings; and
- Containment of asbestos on the site.

##### Response

The construction noise associated with the proposed development has been assessed within the Updated Noise and Vibration Impact Assessment (**Appendix S**) previously submitted with the SSDA. It is anticipated that the requirements received in the submissions will form conditions of consent to be complied with.

SLR has advised that Appendix H of the Noise and Vibration Impact Assessment includes best practice construction noise mitigation and management measures of which will be further developed by the contractor as part of a Construction Noise & Vibration Management Plan, taking into account specific work methodologies and equipment. Further, all construction activities will be undertaken in accordance with the hours specified in Table 1 of the EPA's *Interim Construction Noise Guideline*, ensuring compliance with recommended noise management levels and minimising off-site impacts.

A detailed Construction Environmental Management Plan will be provided prior to construction detailing traffic movements and mitigating dust.

### 4.3.8 Vehicular Access and Loading

#### Vehicular Access

##### Issue

Public submissions raised concerns about the traffic to and from the basement car park as it currently routes through low-traffic areas of the Redfern public housing estate, which houses many high-needs residents. It was recommended that the car park exit be relocated to either Elizabeth or Phillip Street to minimise traffic and reduce conflicts with pedestrians and mobility scooter users, particularly near the pedestrian crossing on Kettle Street. Concerns were also raised about the single entry/exit point on Kettle Street.

##### Response

A Transport Letter has been prepared by Ason at **Appendix R** responding to the concerns around the vehicular access. It notes that while the community's concerns regarding traffic generation within the local area are acknowledged, it is reiterated that the proposed basement access arrangement reflects the existing road hierarchy, which makes it more appropriate for the main site access to occur via the local road network rather

than Elizabeth Street (a regional road) or Phillip Street (a collector road). Phillip Street is further constrained by its proximity to the Elizabeth Street traffic signals and the Walker Street roundabout, limiting its suitability for a new vehicle access point.

The anticipated traffic volumes are low, with an estimated maximum of 30 vehicle trips during any peak hour—equivalent to roughly one vehicle movement every two minutes. This is a conservative estimate and includes residents, ride share, taxis, and PCYC-related activity. The basement car park itself is expected to generate only about 10 vehicle trips per peak hour, which does not pose any significant safety or amenity concerns for pedestrians, cyclists, or mobility scooter users in the area.

Importantly, if the basement access were relocated to Elizabeth or Phillip Street, many vehicles would still use the local roads. This is particularly true for ride share, taxis, family/friend drop-offs, food delivery services, and couriers who typically use local streets due to parking restrictions on both Elizabeth and Phillip Streets.

The abovementioned reasoning for the location of the entry and exit locations is confirmed by the Transport Letter prepared by Ason Group, provided at **Appendix R**.

## Loading Zones

### Issue

TfNSW notes that there is a minor shortfall in capacity of the smaller loading bays to accommodate the service vehicle demands estimated by the Urban Freight Forecasting Model (UFFM) and on-street loading zone is proposed on Walker Street and Elizabeth Street. Further Council noted that the UFFM calculated the requirement of 7 loading bays.

### Response

As noted in the Transport Letter prepared by Ason at **Appendix R** [to be updated as per discussion with Emily], Council communicated that the UFFM was updated by TfNSW for residential land uses following submission of the SSD. Council noted in the meeting that was held to discuss the loading strategy that 5 loading bays would be acceptable if supported by a Loading Dock Management Plan which has been incorporated within the Updated Mitigation Measures at **Appendix B**. The basement plans (provided at **Appendix C**) have been updated to show the locations of the 5 loading bays which includes the following:

- Three (3) x loading van bays;
- One (1) Small Rigid Vehicle (6.4m) in the loading dock; and
- One (1) City of Sydney waste truck (10.5m).

On this basis, reliance on on-street loading bays, while still considered a practical outcome, is not required as part of the SSD.

## 4.3.9 Safety

### Issue

The public submissions raised concerns regarding the provision of social housing within the area and the NSW Police Force have recommended a range of measures to ensure safety within and around the site, including:

- CCTV cameras throughout internal/external areas, especially entries, exits, common areas, and key streets.
- Strategic night-time lighting, especially near CCTV and along Elizabeth and Walker Streets.
- Security systems/alarms to be installed for the commercial premises;
- Consideration of impact-resistant glass
- Enable clear visibility from the commercial tenancy for passive surveillance;
- Secure bike storage;
- Installation of signage detailing conditions of entry; and
- Conducting regular white level inspections of the entire premises.

### Response

A response to each of the comments provided by the NSW Police Force is provided in the Submissions Register at **Appendix A**. Most of the recommendations will be considered by Bridge Housing where appropriate as noted in the Submissions Register at **Appendix A**.

## 4.3.10 Delivery of Aboriginal Social and Affordable Housing

### Issue

The public submissions raised that the EIS in its Aboriginal assessment does not acknowledge the call by The Redfern Waterloo Aboriginal Affordable Housing Campaign for the delivery of at least 10% Aboriginal Social and Affordable Housing on the redevelopment of Government controlled land in Redfern and Waterloo.

### Response

Bridge Housing and Homes NSW have committed to 15% of all social and affordable housing to be specifically provided for Aboriginal households.

## **4.3.11 Perceived privatisation of the site**

### Issue

Submissions from the public raised concerns about the site being “privatised”, contending that the proposal would see approximately 60% of the final 355 homes end up in private hands with no commitment to manage any of the remaining 40% of homes publicly.

Several submissions perceived the project as a divestment of government land to the private sector.

Shelter NSW calls for the following at Redfern Place: 100% of social and affordable dwellings be delivered to the liveable Housing Guideline Gold level.

### Response

It is proposed that the site will remain in public ownership under Homes NSW, who is part of the NSW Government. None of the site is proposed to be sold off to private owners.

It is intended that the housing provided will be social and affordable housing, managed by Homes NSW and Bridge Housing to renters.

All social homes have been designed to a minimum of Silver Livable Housing Australia (LHA) Design Guidelines with 15% of the social housing is also designed to a Gold level LHA and 10 SDA housing designed as fully accessible or high physical support units. This range of homes, all of which are accessible by life and level access, aims to provide variety for the range of tenant needs and longevity to allow for age in place

## 5.0 Design Integrity

The proposal was subject to its fifth and final DRP on 18 March 2025. Overall, the DRP were supportive of the material that was presented and that was lodged as part of the SSDA and recognised the concerted effort in the design coordination that had occurred since the previous DRP that was held prior to lodgement.

In the meeting, it was confirmed that no further reviews of the proposal by the DRP were considered necessary based on the level of documentation provided. In accordance with the DRP Terms of Reference, it is understood the Panel would be called upon in the following instances:

- Where a condition is imposed as part of the SSDA consent which requires advice from the Panel as a term of approval;
- Significant modifications to the SSDA where changes are proposed to the proposal's design (as deemed necessary by the consent authority); or
- The Applicant requests advice from the Panel in relation to any subsequent proposal to modify the approved built form.

A summary of the advice provided by the DRP and a response to each of the comments is provided in **Table 5** below. A copy of the advice is also provided at **Appendix U**.

**Table 5** *DRP 5 general commentary and response*

Component	Panel Commentary	Response
Site-wide and Basement	Ensure that basement EV charging is provided in accordance with the relevant NCC requirements, including location, size and access.	Noted. This is subject to further design development that will be addressed post approval.
	Ensure the design of utilities and servicing, including substations and hydrant fire pump assemblies as may be required for each building by Fire and Rescue NSW etc. are based on the relevant requirements and have been informed by consultation where required.	Noted. This is subject to further design development that will be addressed post approval.
Building S1 (PCYC)	Supportive of the continual design development and in particular the arrival sequence internally with axially aligned doorways.	Noted.
	The Panel commended the 'design jam' process and the involvement of the community in design development.	Noted.
	The Panel requested further consideration of how the building meets the landscape at its south-eastern edge with the through-site link, acknowledging constraints due to the OSD in that location.	Whilst planting is not feasible in this location due to the OSD tank, improved amenity has now been provided via integrated seating, allowing for casual spectating of the sports court through the glazed façade.
Building S2	The Panel were supportive of the design development and introduction of solid brick on the building's lower levels, considering it a far superior outcome to the use of brick slips and an improvement to what was previously presented, despite the minor encroachments into building setback to Kettle Street.	As noted by the Panel, the Building S2 materiality has been further refined and seeks to replace brick slips with solid full brick at the base of Building S2 which has led to a minor encroachment of the landscape setbacks of the Design Guide. The Design Guide notes a minimum 4.5m setback should be provided to Kettle Street, or where it can be demonstrated that development will not result in removal of major structural branches of street trees with trunks more than 1m from the boundary, a 3m setback can be applied. The submitted Building S2 design included some minor encroachments to the 3m setback with portions of the private open spaces associated with the three (3) Walker Street terraces and one (1) apartment (S2.G04) (by approximately 0.8m). The breaches were considered appropriate in the EIS, as

Component	Panel Commentary	Response
		<p>the building line setback (between 4.7m to 6.8m) still remained consistent with the Design Guide.</p> <p>The design amendments seek a replacement of brick slips which will result in a building line setback between 4.35m to 6.65m, which results in a minor inconsistency (comprising 0.15m) with the 4.5m required setback in accordance Design Guide. The upper levels which comprise pre-cast concrete are setback 4.5m which remains consistent with the Design Guide. Despite the 0.15m inconsistency, it should be noted that the trees along Walker Street are anticipated to be retained.</p>
	<p>The balconies and accessways to ground floor dwellings along Walker Street should not erode/ interrupt the connected deep soil zone along Walker Street. Suspended or partially suspended balconies would help to address this.</p>	<p>The condition along Walker Street for Building S2 is driven by the specific requirements of the precinct driveway access ramp and flooding conditions. This results in a condition that is unique on the site and reflected in the adopted approach. The homes adjacent to the driveway ramp are isolated from the common building entries and require their own dedicated street facing entrances and arrival terraces elevated above street level to align with flooding requirements.</p> <p>Additionally, the usable space remaining adjacent to the driveway ramp, while suitable for habitation, is not sufficient to accommodate these terraces within the building footprint. As such, these terraces are elevated, with the undercroft spaces enclosed to avoid the creation of CPTED issues and/or pest management. These terraces weave in and out of the landscape setback, providing important amenity to these homes, while also ensuring that the deep soil provision for the site is achieved without the need for suspended slabs. This configuration meets the deep soil requirements effectively, without compromising the design or the functionality of the site.</p>
	<p>The Panel noted the potential for objects to fall from the upper breezeways and suggested exploring measures to mitigate damage or injury caused by these objects at Ground Level.</p>	<p>In Building S3, the ground level pop-out has been removed to provide overhead building protection at the building entry.</p> <p>The landscaping design provides zone of non-accessible pedestrian space adjacent to the building edge, however at the building entry points, awnings have been provided for in response to the DRP's commentary and will protect pedestrians below.</p>
	<p>The Panel recommended re-exploring the breakout spaces within the breezeway on the ground level, noting the playfulness of these spaces was appreciated in previous iterations of the scheme.</p>	<p>Due to ongoing design development, the breakout spaces for the ground level have been omitted to maximise the central communal garden planting. This planting spills over the walkway and provides a beautiful garden outlook for the homes adjacent. Additionally, the removal of the pause points to this level encourages use of the communal garden amenity rather than gatherings directly outside these ground level homes.</p> <p>The consistent building line on the Ground Level also aims to clearly delineate the communal space and the secure corridor improving safety and security for residents of Building S2.</p>
	<p>The Panel recommended that the breezeway breakout spaces throughout the building are retained.</p>	<p>The breakouts spaces to all levels (apart from ground level) have been retained.</p>

Component	Panel Commentary	Response
	The Panel strongly supports the pitched roof top-of-building motif of Building S2, noting that its material and expression needs to be integral to the materiality of the building and a continuation of the building's character.	The pitched roof motif and materiality expression of the roof has been retained.
	The Panel noted there may be poor sound and vibration amenity concerns for the lower two level apartment within the north-eastern corner of Building S2 which is located directly adjacent to the vehicular access on Kettle Street. Ways to mitigate the potentially noisy roller door should be explored, noting the potential impacts to this apartment (particularly to the upper bedroom).	The design will provide mitigation measures to address any potential impacts to apartments of the roller door at the driveway entry/exit. This could include the use of isolation mounts for the roller door and any required façade treatments.
	The Panel recommended further exploration into the safety clearance dimensions of fixed seating elements and the balustrades in upper breezeways.	The fixed seating elements will be located and detailed to ensure compliance is achieved.
Building S3	The glass line associated with the angled hooded windows is integral to the privacy solution and the glazing needs to be angled with the hood and not brought inwards to align with the external wall.	In response, the glazing line will remain angled with the hood.
	The Panel recommended the team maximise solar access to the glazing of the hooded windows rather than to the hoods themselves, to ensure quality of light in bedrooms and living spaces.	Solar access will be maximised to the glazing line to ensure quality of light in bedrooms and living spaces.
	The Panel queried the inclusion and width of the column/wall (introduced since the last DRP) located vertically along the central portion of the building's eastern façade. It was preferred that the balcony outlook is maximised as much as practically possible.	The column has been reviewed, and it was concluded that given the open corner to this balcony and the extent of the overhang the column is required.
	Confirm requirement for retaining wall that divides deep soil zone along southern portion of Walker Street and eastern section of Phillip Street should be reviewed.	The retaining wall has been reviewed. It has been concluded that given the up to 3m level change in this zone it is considered that the retaining wall should be kept. The wall removes what would otherwise be a continuous large blank wall in this location.
Building S4	The Panel commended the proposal's design development, noting the careful attention and consideration given to the building's presentation to the street.	Noted.
	The Panel noted the opportunity to further refine the rooftop being the fifth façade which will be viewed from the surrounding apartments on the site.	Noted.
	The Panel recommended the project team explore the optimal alignment of the Elizabeth Street bus stop and the through-site link in consultation with the City of Sydney and Transport for NSW.	Noted.
	Maximise width and soil volume in planter boxes along Elizabeth Street to ensure maintenance resilience.	In response, the design of planters along Elizabeth Street have been refined and now accommodate appropriate soil volume.
Landscaping and Public Domain	The Panel strongly support the retention of street trees along Walker Street.	Noted.
	The Panel recommended further exploration into opportunities to maximise and connect deep soil across the site, particularly along Walker Street adjacent to the existing street trees.	The width of the North-South through-site link footpath has been reduced. This adjustment has allowed for the replacement of permeable paving with expanded mass planting zones that connect to

Component	Panel Commentary	Response
		<p>existing deep soil areas. These enhanced zones improve planting opportunities, support habitat and biodiversity, and accommodate a wider swale with greater capacity for water filtration and stormwater management. Further, along Walker Street, the deep soil zone has been extended to the building line, enabling the retention of existing street trees.</p> <p>It should be noted that the deep soil quantum from the lodged SSDA documentation has increased by 3m<sup>2</sup> and remains consistent with the Design Guidelines.s</p>
	The Panel was supportive of the simplification of the communal courtyard spaces. Further consideration of sightlines, particularly to building entries is recommended.	The sightlines to building entries have been a key consideration throughout the design process, guided by CPTED principles and a focus on visual clarity within the communal courtyard spaces. This intent has influenced the overall layout and will remain a priority in the next stage of design. Detailed planting plans will be developed in the next phase to support clear sightlines, enhance safety, and maintain legibility across the development.
	Further consideration of the site's holistic connected living system approach was recommended, ensuring soil, water, biodiversity and resilience for maintenance underpin the landscaping design.	The proposal includes a landscaping strategy that prioritises soil health, water management, biodiversity, and long-term resilience. In line with this approach, permeable paving within the through-site links has been removed and replaced with expanded habitat planting zones. This change not only enhances ecological outcomes and supports biodiversity but also enables a wider swale with increased capacity for water filtration and stormwater management, contributing to the site's overall environmental performance.
	The Panel recommended the drainage strategy focuses on feeding groundwater into the swales and reducing reliance on piped stormwater systems for less than 3-month events where possible. The effectiveness of swales as shown on the submitted documents was queried.	The proposal includes a review of the swale's capacity to support groundwater recharge and reduce reliance on piped stormwater systems. The technical details of the swale, including its design and performance, will be further refined and developed as part of design development.
	The Panel encourages greater diversity of landscaping to ensure the mix and quantum of planting increases biodiversity and encourages the pollinators.	The proposal includes an increased diversity of landscaping to enhance biodiversity and support pollinators. A range of plant species have been included in the design, and more detailed planting plans will be developed in the next stage to further refine the planting mix and density.
	The Panel recommended the team prepare a coordinated drawing which shows how the street trees, Tree Protection Zones and deep soil are integrated, as well as showing incursions caused by the proposal.	This information has been added to the Tree Management Plan, which now includes a coordinated drawing that illustrates how the street trees, Tree Protection Zones, and deep soil are integrated
	The Panel noted the importance of ensuring planter boxes both at ground level and on rooftop terraces are adequately sized and designed for drainage and water access.	Adequate soil volumes have been provided in accordance with the City of Sydney Landscape Code to ensure healthy plant growth in the planter boxes on the rooftop terraces. The design of these planters, including considerations for drainage and water access, has been addressed in principle and will be further developed in the next phase of design.

Component	Panel Commentary	Response
		On the ground floor, the strategy involves using a landscape edge that retains soil, rather than mounding, to support planting and trees.
	While the Panel appreciated the difficulties with maintaining real turf on the building rooftops, it was suggested that alternative solutions to the use of synthetic turf be explored, noting it would be subject to direct extended periods of hot sun during warmer months.	<p>It is highlighted that real turf on the rooftops presents potential issues for the longevity of the design due to maintenance requirements. Synthetic turf offers a practical alternative by providing the aesthetic and functional benefits of real turf without the maintenance difficulties. It provides a soft surface for rooftop spaces, supporting activities like barefoot play, picnicking, relaxation, and pet-friendly spaces, enhancing amenity while ensuring a longer design life.</p> <p>However, the materiality of the rooftop will be further developed in the next phase of works to ensure it meets both functional and aesthetic requirements.</p>

## 6.0 Updated Project Justification

Following the public exhibition of SSD-51274973 from 7 November to 4 December 2024, the Applicant comprehensively reviewed each submission made by Government bodies and agencies, Council, and the community. Further consultation has also been undertaken as discussed at **Section 3.2**.

Amendments have been proposed to the project to account for further refinement and enhancement of the proposed design, seeking to minimise impacts and improve amenity. The following amendments are proposed as part of this report:

The following amendments are proposed to the project:

- Additional flood mitigation measures including:
  - Introduction of drainage pits near the Building S2 entry and inclusion of drainage pipe to flood storage tank located under Building S4;
  - Increase in flood storage tank area beneath Building S4;
  - All terraces on Walker Street have been raised to be above the Probable Maximum Flood (PMF) ensuring residents can shelter safely in place; and
  - Minor design amendments to the access of the fire pump room to ensure the fire pump room is protected during a flood event.
- Basement Level:
  - Increased individual building waste storage areas and reconfiguration/relocation of residential bulk store room;
  - Inclusion of end-of-trip facilities for commercial uses comprising 13 personal lockers and two (2) shower and change cubicles; and
  - Amendments to bicycle parking to comply with the relevant Australian Standards.
- Revised Building S4 northeast lobby to improve accessible ramp access to the lift and provide improved bicycle access to the basement.
- Amendments to improve residential privacy including:
  - Raised windowsill heights on bedrooms interfacing with breezeways; and
  - Introduction of window hoods on levels 1-4 of Building S3 apartments to mitigate onlooking from the breezeways.
- Potential retention of additional high value street trees addressed through proposed change to landscape treatment on Walker Street;
- Site-wide landscaping amendments comprising:
  - Additional shading structure on Building S4 rooftops;
  - Further development of rooftop gardens including use of moveable planters;
  - Further refinement of rooftop planter soil depths;
  - Further refinements to the planting palette;
  - Updates to Phillip and Elizabeth Street footpaths to align with Council's public domain guidelines; and
  - Refined Ground Level courtyard design to enhance constructability and address crime prevention through environmental design concerns.
- Ongoing design development and updates including:
  - Building S1:
    - Further resolution of materials;
    - Reduced lift core and lift overrun allowances;
    - Amendments to the Ground Level and Level 2 amenities;
    - Updated waste and storage rooms; and
    - Reduction of GFA from 3,542m<sup>2</sup> to 3,535m<sup>2</sup> (total reduction of 7m<sup>2</sup>).
  - Building S2:
    - Inclusion of Building S2 Grand Juliet balconies only provided to apartments without traditional balconies. Full-height windows replace the previous façade design and include awning operability;
    - Removal of pitched roof motif from lower levels;

- Removal of Ground Level breezeway pop outs to avoid imposition on the central communal space and improve building security;
- Refinement of bathroom windows to allow for durable internal wall lining arrangement and to host internal bathroom services; and
- Refinement of materiality including replacement of brick slips with solid full brick at the base for durability.
- Building S3:
  - Removal of Ground Level breezeway pop outs to avoid imposition on the central communal space; and
  - Provision of awning over building entry for weather protection.
- Building S4:
  - Revision of planter along Elizabeth Street from two-tier to single-tier to improve soil depth;
  - Revised commercial amenities;
  - Amendments to north-west lobby to improve access to reception; and
  - Inclusion of metal fin screen on ground level for natural ventilation to fire pump room.

The proposal, as amended, responds to concerns raised within the submissions and will deliver substantive public benefits for Redfern and Sydney as a whole, including that of the following:

- Delivery (subject to funding) of 197 affordable housing apartments, 147 social housing apartments and 10 Specialist Disability Accommodation units (and one (1) carers unit) in a location close to public transport providing connections to employment destinations and other amenities;
- Improved flood management strategy to respond to all flood events and provide a shelter in place strategy in certain flood events such as the PMF;
- Improved privacy for residents, particularly through design measures that address concerns regarding overlooking;
- Provision of end-of-trip facilities, encouraging active transport for staff; and
- Improved landscaping including that provides a wider variety of planting, potential to further retain high value trees, and increase soil depth in planters.

The proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective. Therefore, it is recommended that this SSDA be approved subject to standard conditions of consent, given that the proposed development:

- is consistent with the relevant strategic planning framework and guidelines;
- is consistent with the relevant statutory legislation and requirements;
- will not generate unreasonable environmental impacts; and
- is suitable for the site, and in the public interest.