

7-9 GIBBONS ST REDFERN – MAJOR PROJECT 08_0112
 RESPONSE TO SUBMISSIONS ARISING FROM PUBLIC EXHIBITION OF ENVIRONMENTAL ASSESSMENT

NUMBER	SUBMISSION	COMMENT
1.	<p>(Department of Planning)</p> <p>FSR of building exceeds FSR provisions under Major Development SEPP. A variation to this provision is only possible under a Concept Plan or SEPP amendment. Application should be amended to ensure compliance with this provision</p>	Plans have been amended to reduce FSR to comply with 7:1 Development Standard
2.	<p>(Department of Planning)</p> <p>Consideration of additional measures to promote public transport usage as the site is located in close proximity to various public transport services. In this context, further justification for the proposed number of car parking spaces for the supermarket, including a survey of car parking demand for supermarkets in the immediate area and similar highly accessible locations.</p> <p>In addition, further justification is to be provided for the proposed 80 car parking spaces for the Lawson Square Towers.</p> <p>Consideration of further parking for bicycles is to be provided in accordance with City of Sydney DCP 11. Change rooms and lockers for non-resident employees who might come to work by bicycle at are to be provided.</p>	<p>See response at Item 11</p> <p>See response at Item 12</p> <p>Bicycle parking spaces, change rooms , showers and lockers have been incorporated in revised plans</p>
3.	<p>(Department of Planning)</p> <p>Consideration of further articulation of the southern facade of the podium including design elements to increase visual interest given its streetscape prominence. Consideration should be given to using a similar diversity of coloured and textured materials in the podium as has been designed on the western elevation of the podium.</p>	Plans have been revised

4.	<p>(Department of Planning)</p> <p>Amendments should be made to improve visual surveillance and activation along Marian Street from the podium retail and office floor space and on the lower levels of the eastern facade to provide surveillance over William Lane. This could include additional openings and articulation in the facade to increase interaction with the streetscape.</p>	<p>Plans have been revised to improve visual surveillance and activation over Marian St. However, it is considered impractical to activate the eastern facade of the development at ground level in William St as the ground level use of the development is a loading dock.</p>
5.	<p>(Department of Planning)</p> <p>Consideration of further design amendments to the northern, eastern and southern facades of the tower shaft, including consideration of: contrasting colours and materials and articulation treatments, and additional glazed elements. Justification is to be provided for the four vertical elements that enclose the windows/balconies on the southern and eastern facades.</p>	<p>Plans have been revised</p> <p>The vertical elements on southern and eastern facades that enclose the balconies have been revised and are now more open in nature.</p> <p>As a consequence they will provide more activation to and surveillance over Marian St and William Lane</p>
6.	<p>(Department of Planning)</p> <p>Consideration of separate access for the residential and commercial lobby areas. It is also recommended that the lobby access along Gibbons Street be relocated to the building line to avoid indented spaces that do not have good visibility.</p>	<p>This has been incorporated in revised plans</p>
7.	<p>(Department of Planning)</p> <p>Further justification for the proposed dwelling mix, including consideration of some three-bedroom apartments in order to diversify the likely resident population.</p>	<p>Neither the Redfern Waterloo Built Environment Plan (BEP) nor the Major SEPP controls contain any explicit unit mix requirements.</p> <p>SEPP65 identifies the principles for housing as follows: <i>New developments should optimise the provision of housing to suit the social mix and needs in the neighbourhood or, in the case of precincts undergoing transition, provide for the desired future community.</i></p> <p>The BEP identifies the desired future housing characteristics as follows: <i>“Around 2,000 new dwellings will be developed in Redfern-Waterloo under Stage One of the Plan reflecting a potential population increase of around 4,000 residents. The dwellings will be located throughout the RWA’s</i></p>

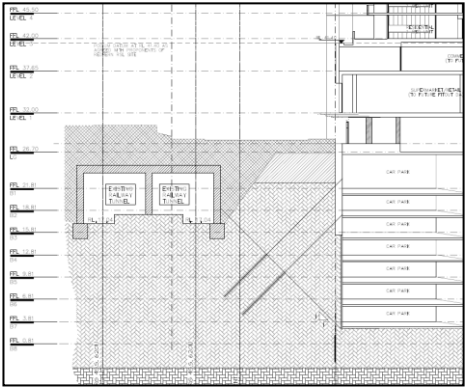
		<p><i>strategic sites and include low, medium and high-rise apartment development, town houses and terraces.</i></p> <p><i>The increase in dwelling numbers, diversity and tenancy mix will provide greater housing choice and contribute to the creation of a more socio-economic diverse community”.</i></p> <p>The proposed unit mix of 31 x 2 Bedroom units, 89 x 1 Bedroom units and 31 Studio units is considered to be consistent with the objective of providing an increase in tenancy mix and reflects the anticipated demand in the area having regard to the site's proximity to the CBD and to the university.</p> <p>The developer of the subject site considers that there is limited demand for 3 Bedroom units as exhibited by their difficulty to sell; based on his experience with similar units in the southern precincts of the Sydney CBD.</p> <p>The proposed mix is considered to reflect the future needs of residents in the area and is considered to provide a satisfactory mix of housing choice.</p>
8.	<p>(Department of Planning)</p> <p>The EA indicates that the application seeks approval for strata subdivision. Draft strata plans including any accompanying instruments, should be submitted for consideration.</p>	<p>A strata plan has not been sought as part of this application. The Environmental Assessment makes note that it is intended that the building will be strata subdivided. In this regard, it is acknowledged that strata subdivision will be the subject of a separate application.</p>
9.	<p>(Department of Planning)</p> <p>Public domain works along Marian Street and Gibbons Street should be in accordance with the City of Sydney Council's Public Domain Manual and Street Design Code.</p>	<p>Will comply. This matter should be a condition of consent</p>
10.	<p>(Department of Planning)</p> <p>The Department also requests that you provide photomontages of the building as viewed from all four elevations.</p>	<p>Photomontages have been prepared and are at Attachment A</p>

11.	<p>(City of Sydney)</p> <p>Car Parking Supermarket</p> <p>The car parking provision is suggested to comply with the requirements of Council's Development Control Plan No. 11 — Transport Guidelines for Development 1996 (DCP 11). Whilst the car parking provision for the residential, retail and commercial elements comply with DCP 11, the car parking for supermarket has not been determined in accordance with DCP 11. Specifically, the DCP requires car parking provision for supermarkets to be based upon a survey of similar supermarket located in similar circumstances.</p> <p>Contrary to the assertion in Section 6.6.1 of the Environmental Assessment (EA) that this supermarket is a 'car based model', its size is less than half the size of a full-line supermarket and is not appropriately categorised as such. In addition, having regard to its close proximity to Redfern train station and its urban context, car parking provision should be reduced. The assertion of a 'car based model' for the supermarket is also contradicted in Section 1.4.16 of the EA which states:</p> <p>It is anticipated that a significant portion of supermarket customers will either work or live in the vicinity of the site and as a consequence, the use will promote walking/cycling as well as the use of public transport.</p> <p>Further, the assertion in Section 6.6.1 that Council consistently approves car parking for supermarkets in excess of the RTA rates is incorrect and has successfully contested such applications in the Land & Environment Court (10521 of 2008 Artro Management Pty Limited v City of Sydney).</p>	<p>The traffic consultant has provided the following comment:</p> <p><i>"The parking provision is compliant with Council's DCP which promotes a survey-based approach.</i></p> <p><i>With regard to the supermarket, the adopted rate (4.2/100) is generally consistent with every comparable supermarket recently approved by Council, including Coles at Crown Square (4.5/100m2), Woolworths on the former St. Margaret's site (4.5/100m2) and Aldi at Danks Street (4.4/100m2). This reflects the more car-dominant nature of supermarkets compared with other retail uses, particularly Aldi supermarkets which involve bulk purchases.</i></p> <p><i>The cited example of a grocery store at Erskineville Road is quite different. I was involved in that appeal and the store was a different 'model' in that there were no trolleys, it was small (850m2) and it drew on passing pedestrians accessing two nearby railway stations (some 4,000 per day) who already walk directly past the site. It is more like the Fratelli's or Coles stores at Pott's Point (which provide no parking) and are more for small convenience shopping serving locals...not what Aldi has in mind and the prospect of Aldi customers walking to the store is reasonably limited, though it is still likely to be significant in this location. I also acted for Sydney City Council on a recent appeal in Fountain Street for a Woolworth's store, which was successfully defended for providing insufficient parking and again, a rate of 4.2 spaces/100m2 was indicated as being appropriate.</i></p> <p><i>In that appeal, I surveyed the existing Aldi supermarket at Canterbury which is adjacent to the railway line and bus services and is within the town centre. That also showed a peak demand of 4.1/100m2. The survey was undertaken in November 2009 and is arguably the most comparable supermarket in all respects to our proposal, with an area of 1,200m2."</i></p>
-----	---	---

12.	<p>(City of Sydney)</p> <p>Lawson Square Towers Carparking</p> <p>It is noted that the proposal seeks to provide 80 car parking spaces for the Lawson Square Towers as that development relied upon car parking provision on the subject site which was dictated via conditions of consents from 1970 and 1972 which require 156 car parking spaces.</p> <p>In this first instance, the proposed provision of 80 spaces for the Lawson Square Towers does not 'comply' with the requirement for 156 spaces as imposed some 40 years ago. The shortfall in spaces is to such an extent that 80 car spaces cannot reasonably be construed as being provided to comply with the 1970's requirement.</p> <p>It is acknowledged that the Lawson Square Towers relies upon car parking provision on the subject site, however the provision of so car parking spaces is an arbitrary amount of car parking, Car parking provision for the Lawson Square Towers should be based upon policy, being the car parking requirements in Council's current planning controls for the quantum and nature of GFA in the Lawson Square Towers, namely DCP 11. This reflects Council's current approach to car parking provision in the City which encourages a reduction in car dependency.</p>	<p>The comments of the City of Sydney that the proposed carparking number of 80 cars does not comply with the 156 approved....and therefore are non-compliant with the 1970 consent are noted.</p> <p>If compliance was sought, the full 156 carparking spaces could be provided. However, as the subject development is well served by public transport (nearby Redfern railway station and numerous bus routes, it was considered appropriate to reduce the carparking provision by approximately 49% to 80 spaces.</p> <p>This number is derived from the terms of current tenancy lease provisions with the Police Force and other government and private organisations as follows:</p> <table><tr><td>• Police Force:</td><td>30</td></tr><tr><td>• Premiers Department:</td><td>8</td></tr><tr><td>• PRA:</td><td>22</td></tr><tr><td>• Redkite:</td><td>2</td></tr><tr><td>• Redfern Waterloo Authority:</td><td>6</td></tr><tr><td>• Bridge Housing:</td><td>10</td></tr><tr><td>• Group Colleges Australia:</td><td>5</td></tr><tr><td>• Travelex:</td><td>2</td></tr></table> <hr/> <p>TOTAL SPACES 85</p> <p>Having regard to the current tenancy requirements and the potential future tenants of the building, it is considered that the provision of 80 car spaces is sufficient and appropriate.</p> <p>An analysis of the applicable current carparking provisions under DCP 11 has also been undertaken. The GFA of the Lawson Square Towers is approx 10,800 sqm. The permissible carparking provision on the basis of 1 car space per 125 sqm of GFA is 86.4, say 87, car spaces</p> <p>Moreover, the site of the Lawson Square Towers is identified for redevelopment under the Redfern Waterloo Built Environment Plan. The FSR for the site is 7:1. The maximum GFA for future development on the site is 11,816 (on site area of 1,688sqm). Consequently, under DCP</p>	• Police Force:	30	• Premiers Department:	8	• PRA:	22	• Redkite:	2	• Redfern Waterloo Authority:	6	• Bridge Housing:	10	• Group Colleges Australia:	5	• Travelex:	2
• Police Force:	30																	
• Premiers Department:	8																	
• PRA:	22																	
• Redkite:	2																	
• Redfern Waterloo Authority:	6																	
• Bridge Housing:	10																	
• Group Colleges Australia:	5																	
• Travelex:	2																	

		<p>11, the carparking provision for a commercial development is (94.5) 95 spaces.</p> <p>Therefore, in summary, the current on-site provision of carparking for the Lawson Square Towers is 156 spaces (located on the subject site at 7-9 Gibbons St). The current tenant allocation is 85 spaces.</p> <p>The proposed allocation of car spaces for the Lawson Square Towers as part of the redevelopment of the subject site is 80 spaces.</p> <p>DCP 11 nominates a rate of carparking which “<i>offers a balanced compromise by satisfying a large proportion of parking demand on-site, addressing car reduction objectives of Council’s strategy, and minimising the unreasonable overflow of parking onto surrounding streets</i>”</p> <p>Under DCP11, the carparking provision (which caters for carparking reduction) is :</p> <ul style="list-style-type: none"> • 86 spaces for the existing Lawson Square building is and • 95 spaces for the redevelopment of the Lawson Square site in accordance with the BEP. <p>It is therefore considered that the provision of 80 spaces is satisfactory, appropriate and represents a significant reduction of on-site carparking, on any assessment of the merits of case.</p>
13.	<p>(City of Sydney) Bicycle Parking</p> <p>DCP 11 requires the provision of 1 bicycle parking space per 3 units, and 1 space per 20 employees for the commercial offices. At a minimum 50 bicycle parking spaces are required and only 12 are identified on the architectural plans.</p>	Bicycle parking will be provided in accordance with DCP 11
14.	<p>(City of Sydney) Design Issues</p> <p>The following design issues have been identified:</p> <ul style="list-style-type: none"> • The southern facade of the podium is a highly visible building element as viewed from Gibbons Street due to the low scale of the buildings to the south of the site which do not enjoy the increase in height that is attributed to the subject site under the Built Environment Plan and as 	

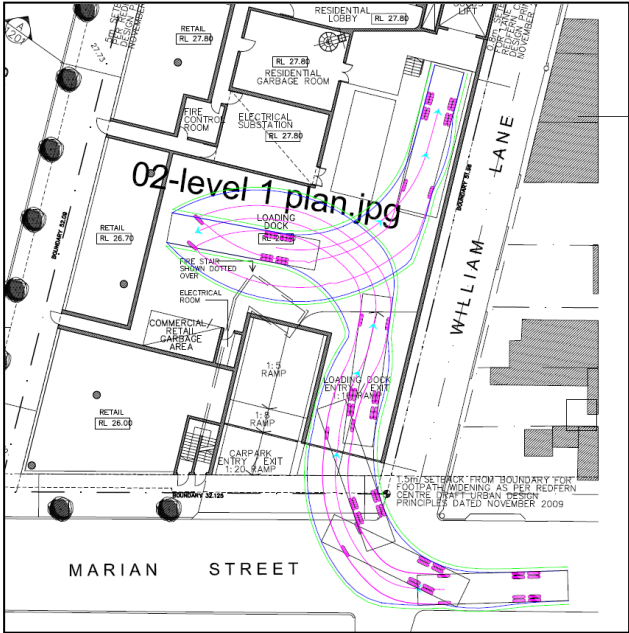
	<p>such the subject building will remain visible in the future. It is noted that the majority of the southern facade of the podium is occupied by precast concrete with no visual relief. It is suggested that further design refinement of this element is necessary to provide an improved and satisfactory address to Gibbons and Marion Streets.</p> <ul style="list-style-type: none"> • The proposed access to the residential lobby is through the commercial lobby area. The commercial lobby area will be used by shoppers with their trolleys as well as commercial clients and it is completely inappropriate for residential occupants to have to negotiate the commercial lobby to access the residential lobby. Completely independent access should be provided for the residential occupants. • The 15m width of the driveway servicing the car park entrance and the loading dock is excessive and Council generally does not support a width greater than a double driveway due to the potential conflict between pedestrians and vehicles. At a minimum a pedestrian refuge should be provided to minimise conflict. • The proposed awning appears to extend over the carriageway of Gibbons Street in the south elevation. 	<p>Facade designs amended and are found in Attachment A.</p> <p>Separate lobbies have been provided</p> <p>The width of vehicular access has been minimised. A central refuge is considered inappropriate in this instance as it will necessitate the reduction of active retail uses in Marian St.</p> <p>The awning does not extend over the carriageway even though the drawing appears to show it. This is a consequence of the building being at an angle to the drawing of the elevation.</p>
15.	<p>(City of Sydney)</p> <p>Signage Strategy</p> <p>The proposal does not include any signage details for the ground floor retail, the supermarket or the commercial offices. The location, size and design of the signage need to integrate appropriately with the architecture of the building to ensure a cohesive result is achieved. Therefore, it is appropriate for a signage strategy to be prepared by the architect for the building prior to consent to ensure a co-ordinated approach to signage is achieved. The signage should be consistent with the City of Sydney Signage and Advertising Structures DCP 2005.</p>	<p>Indicative locations of signs (under awning, top hamper and wall signage) have been shown on the plans at Attachment A. However, approval for signage is not sought as part of this application and it is acknowledged that a separate Development Application will need to be submitted such signage.</p>

	<p>Conditions of Consent</p> <p>It is requested that in addition to standard conditions of consent, the attached conditions of consent are imposed, relating to the following:</p> <ul style="list-style-type: none"> • public domain condition • conditions relating to supermarket management and trolleys • condition relating to shop fronts 	Draft conditions of consent noted
16.	<p>(RailCorp)</p> <p>Cross - Sectional Drawings</p> <p>RailCorp notes that there are no drawings identifying the relationship of the proposed development with existing rail infrastructure either vertically or horizontally and most notably the Illawarra Relief tunnels. A reference within the Attachment 10 nominates drawings but these were not attached. It would seem from some of the written information provided that the site excavation will extend to well below the level of the tunnels and that soldier piles and anchors are proposed to be used for temporary support of the excavation. These factors will require very close and detailed scrutiny particularly if it is proposed to install anchors in the vicinity of the tunnel easement.</p>	<p>Cross Section drawings, Attachment H, have been prepared based on survey data. A reduced copy is reproduced below:</p> 
17.	<p>(RailCorp)</p> <p>Geotechnical Report</p> <p>The Geotechnical report is incomplete as no boreholes have been taken on the subject site. Rather they have been extrapolated from the adjacent RSL site. Following completion of demolition of the existing premises it is proposed that additional boreholes are to be undertaken and the results used to update the geotechnical report and modelling for the purpose of finalising design processes. This report update is to be provided to RailCorp for review and endorsement.</p>	Noted. This should be a condition of consent.

18.	<p>(RailCorp)</p> <p>Acoustic Report</p> <p>The Acoustic report only deals with, the impact of the rail corridor, infrastructure and operations on the proposed Development. It does not address any potential impact of the excavation or construction works from the development site on the rail tunnels, station or infrastructure and this will need to, be part of the review processes.</p>	<p>Railcorp raises concerns that the acoustic report does not address the potential impact of excavation works (required for the construction of the basement levels of the development) on the adjacent rail tunnel.</p> <p>The acoustic consultant states that this component of the assessment is more appropriately undertaken during the detailed design phase of the development, once the detailed construction methods have been established and specific geotechnical studies have been undertaken.</p> <p>It is therefore considered appropriate for the acoustic testing, analysis and assessments undertaken for the purpose of mitigating structural impacts to the rail tunnel be provided to Railcorp for review to ensure satisfactory outcomes after the demolition of the existing building on the site but prior to the issue of the Construction Certificate for excavation and construction of the development.</p>
19.	<p>(RailCorp)</p> <p>Consultation with RailCorp</p> <p>It is noted that RailCorp has been provided very little correspondence or documentation from the Proponent and the supposed consultation to date has only included 3 very brief and limited meetings for generalised discussion. At these discussions it was indicated that there would only be around five (5) basement levels but the EA submission would suggest that this does not appear to be the case and that the number of basements and depth of excavation will be deeper than previously indicated. It is believed minutes have been prepared for one of those meetings written by the Proponent but these were never provided to RailCorp except as an attachment in this latest Part 3A EA submission. Pages 36-40 inclusive of the Kass-Hermes Environmental Assessment dated March 2010 identifies the RailCorp requirements and methods for meeting these requirements. To enable compliance with these requirements it will be necessary for the Proponent to engage in ongoing consultation with. RailCorp not only for design but also for methodologies, monitoring purposes and if required final endorsement of works.</p>	<p>Consultation will continue to be made with RailCorp</p>

20.	<p>(RailCorp)</p> <p>RailCorp looks at your Department to assist in ensuring the Proponent to assist in ensuring the Proponent meets the above requirements, preferably prior to approval, but at a minimum prior to Construction Certificate</p>	Noted
21.	<p>(RailCorp)</p> <p>a) The Applicant shall provide an accurate survey locating the development with respect to the rail boundary and rail infrastructure. This work is to be undertaken by a registered surveyor, to the satisfaction of RailCorp's representative.</p> <p>b) Prior to the issue of a Construction Certificate the applicant shall undertake a services search to establish the existence and location of any rail services. Persons performing the service search shall use equipment that will not have any impact on rail services and signalling. Should rail services be identified within the subject development site the Applicant must discuss with RailCorp as to whether these services are to be relocated or incorporated within the development site.</p> <p>c) Prior to the commencement of works, during the works, prior to the issue of the Occupation Certificate, and following occupation, a joint inspection of the rail infrastructure and property in the vicinity of the project is to be carried out by representatives from RailCorp and the Applicant. These dilapidation surveys will establish the extent of any existing damage and enable any deterioration during and after construction to be observed. The timing of the surveys is to be agreed with RailCorp. The submission of a detailed dilapidation</p>	<p>Sections have been prepared showing the relationship of the development to the rail infrastructure (Attachment H). These were based on a survey (Attachment I) at the northern portion of the site and the location of the tunnel interpolated southwards. Additional surveys will be undertaken to verify the tunnel location to the south. It is considered that the requirement for this survey should be a condition of consent and be submitted prior to the issue of the Construction Certificate.</p> <p>Noted</p> <p>Noted</p>

	<p>report will be required unless otherwise notified by RailCorp.</p> <p>d) Prior to the issue of a Construction Certificate the Applicant is to engage an Electrolysis Expert to prepare a report on the Electrolysis Risk to the development from stray currents. The Applicant must incorporate in the development all the measures recommended in the report to control that risk. A copy of the report is to be provided to the Principal Certifying Authority with the application for a Construction Certificate</p> <p>e) Prior to the issue of a Construction Certificate a Risk Assessment/Management Plan and detailed Safe Work Method Statements (SWMS) for the proposed works are to be submitted to RailCorp for review and comment on the impacts on rail corridor. The Principle Certifying Authority shall not issue the Construction Certificate until written confirmation has been received from RailCorp confirming that this condition has been satisfied.</p> <p>f) Prior to the issuing of a Construction Certificate the Applicant is to submit to RailCorp a plan showing all craneage and other aerial operations for the development and must comply with all Rat/Corp requirements. The Principle Certifying Authority shall not issue the Construction Certificate until written confirmation has been received from RailCorp confirming that this condition has been satisfied.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
--	--	--

22.	<p>(RTA) The traffic report submitted with the application states that the longest vehicle accessing the proposed loading dock is a 12,5 metre long heavy rigid vehicle. However, it is noted that 10.5 m HRV and 8.8 m MRV are used as design vehicles in the swept path analysis in the traffic report. Therefore, a modified swept path analysis of a 12.5 m long HRV should be submitted, prior to the determination of the development application.</p> <p>In addition to the above, it is possible that delivery vehicles longer than 12.5 metres will deliver goods to the proposed supermarket as these delivery vehicles are likely to do multiple deliveries in one trip. Therefore, the developer needs to satisfactorily demonstrate to the Department of Planning and the RTA that the supermarket can deliver all goods with a truck no longer than 12.5 metres in length.</p>	<p>This matter has been addressed by the traffic consultant. The dock is designed for a 12.5m HRV. A swept path diagram has been prepared and is attached to the Preferred Project Report at Attachment K. A reduced copy is reproduced below:</p> 
23.	<p>(RTA) No Stopping parking restrictions shall be provided along the Marian Street frontage of the subject site between William Lane and Gibbon Street as deliver vehicles are likely to park on the Marian Street frontage of the subject site, which will affect traffic flow and driver's sight distance at the proposed driveways. The No Stopping parking restrictions shall be referred to the City of Sydney Traffic Committee for endorsement</p>	Noted. This is for Council attention.
24.	<p>(RTA) Existing No Stopping parking restrictions are to remain along the Gibbons Street frontage of the subject site.</p>	Noted. This is for Council attention.

25.	<p>(RTA) It is noted that the proposed development will result in a loss of 76 off-street car parking spaces associated with the Lawson Square Towers, which is a 50% reduction. The proposed number of car parking spaces on the subject site shall be addressed to the satisfactory of the Department of Planning in consultation with the Council.</p> <p>In determining the number of parking spaces, it should be noted that there is limited on-street parking capacity in the vicinity of the subject site.</p>	<p>The RTA's comment that the provision of 80 car spaces for the Lawson Square Towers may be insufficient is noted. The quantum of carparking provided is based on the current and anticipated tenant demand for the Lawson Square Towers and compliance with South Sydney DCP 11. It is therefore considered that the availability of on-street carparking will not be significantly impacted by the reduction of carparking spaces for the Lawson Square tenants.</p> <p>See response to Item 12 above.</p>
26.	<p>(RTA) The proposed development will generate and attract additional pedestrian and cyclist movements in the vicinity of the site. Consideration should be given to the provision of pedestrian and cyclist facilities as part of the development application. In this regard, the developer should provide the following:</p> <p>a Pedestrian crossing facility in Gibbons Street</p> <p>b. Bicycle parking facilities either within the development or close to it, as well as end trip facilities such as showers, changing rooms, etc. to encourage bicycle use for travelling to and from the development</p>	<p>Pedestrian and Bicycle facilities have been provided.</p> <p>Any general traffic management matters that relate to the general public should be referred to Council.</p> <p>Bicycle facilities have been incorporated into the development on Level 2 (Commercial tenancy floor)</p>
27.	<p>(RTA) The existing driveway on the Gibbon Street frontage of the subject site shall be removed with kerb and gutter reinstated to match the existing. Details of further requirements can be obtained from the RTA's Project Services Manager, Sydney Project Services, Parramatta</p> <p>A certified copy of the design plans shall be submitted to the RTA for consideration and approval prior to the release of a Construction Certificate by Council and commencement of road works.</p> <p>The RTA fees for administration, plan checking, civil works inspections and project management shall be paid by the developer prior-to the road works.</p>	<p>Noted. This can be made a condition of consent</p>

28.	(RTA) The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004, AS 28902-2002, and AS 2890.6 2009	Noted. This can be made a condition of consent
29.	(RTA) Retail parking should be separate from residential parking and should be clearly sign posted.	Noted. This can be made a condition of consent
30.	(RTA) The internal aisle ways are to be marked with pavement arrows to direct traffic movements in / out of the site and guide traffic circulation through the car park.	Noted. This can be made a condition of consent
31.	(RTA) The proposed turning areas within the car park are to be kept clear of any obstacles, including parked cars, at all times.	Noted. This can be made a condition of consent
32.	(RTA) All vehicles are to enter and leave the site in a forward direction	Noted. This can be made a condition of consent
33.	(RTA) All vehicles should be wholly contained on site before being required to stop.	Noted. This can be made a condition of consent
34.	(RTA) All loading and unloading shall occur onsite	Noted. This can be made a condition of consent
35.	(RTA) The required sight lines to pedestrians and / or other vehicles in or around the entrances are not to be compromised by landscaping, signage, fencing or other materials.	Noted. This can be made a condition of consent
36.	(RTA) AS 2890.1 - 2004, Clause 3.3 (a) for property line / building alignment / pedestrian path, permits a maximum gradient of 1 in 20 (5%) between edge of frontage road and the property line , building alignment or pedestrian path for at least the first 6 metres into the car park Council should ensure that the gradients provided for the development complies with AS 2890.1 - 2004.	Noted. This can be made a condition of consent
37.	(RTA) Clear sight lines shall be provided at the property boundary line to ensure adequate visibility between vehicles leaving the car park and pedestrians along the frontage road footpath in accordance with Figure 3.3 of AS 2890.1 - 2004 for light vehicles and AS 2890.2 - 2002 for heavy vehicles.	Noted. This can be made a condition of consent

38.	(RTA) A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council prior to the issue of a construction certificate, All construction access shall be via Marian Street No construction access shall be via Gibbons Street.	Noted. This can be made a condition of consent
39.	(RTA) All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping.	Noted. This can be made a condition of consent
40.	(RTA) The developer shall be responsible for all public utility adjustments/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents.	The scope of works needs to be clarified prior to the developer giving any undertaking to carry out such works
41.	(RTA) All works/regulatory signposting associated with the proposed development are to be at no cost to the RTA.	Noted. This can be made a condition of consent
42.	<p>(Sydney Water)</p> <p>Sydney Water Servicing</p> <p>Sydney Water will further assess the impact of the development when the proponent applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess if amplification and/or changes to the system are applicable. Sydney Water requests the Department continue to instruct proponents to obtain a Section 73 Certificate from Sydney Water.</p> <p>The proponent must fund any adjustments needed to Sydney Water infrastructure as a result of any development. The proponent should engage a Water Servicing Coordinator to get a Section 73 Certificate and manage the servicing aspects of the development. Details are available from any Sydney Water Customer Centre on 13 20 92 or Sydney Water's website at www.sydneywater.com.au.</p>	Noted. This can be made a condition of consent

43.	<p>(Sydney Water)</p> <p>Stormwater</p> <p>This development drains downstream to connect into Sydney Water's Sheas Creek trunk drainage stormwater channel no.89. Sydney Water requests that the proposed development meets contemporary water quality discharge requirements. As a minimum, the 1997 NSW Environment Protection Authority guidelines should apply.</p> <table><tr><th>Pollutant</th><th>Requirement</th></tr><tr><td>Suspended Solids</td><td>80% reduction of the average annual load</td></tr><tr><td>Total Phosphorous</td><td>45% reduction of the average annual load</td></tr><tr><td>Total Nitrogen</td><td>45% reduction of the average annual load</td></tr><tr><td>Litter</td><td>Retention of litter greater than 50mm for flows up to 25% of the 1 year ARI peak flow</td></tr><tr><td>Coarse Sediment</td><td>Retention of sediment coarser than 0.125mm for flows up to 25% of the 1 year ARI peak flows</td></tr><tr><td>Oils and Grease</td><td>In areas with concentrated hydrocarbon deposition, no visible oils for flows up to 25% of the 1 year ARI peak flow</td></tr></table>	Pollutant	Requirement	Suspended Solids	80% reduction of the average annual load	Total Phosphorous	45% reduction of the average annual load	Total Nitrogen	45% reduction of the average annual load	Litter	Retention of litter greater than 50mm for flows up to 25% of the 1 year ARI peak flow	Coarse Sediment	Retention of sediment coarser than 0.125mm for flows up to 25% of the 1 year ARI peak flows	Oils and Grease	In areas with concentrated hydrocarbon deposition, no visible oils for flows up to 25% of the 1 year ARI peak flow	<p>The hydraulic consultant states that the previous development on the site was a carpark with the top floor exposed to the elements and as such there would have been a discharge of various pollutants including oil and grease. However, the proposed development has a roof area covering over 95% of the site and as such the runoff from the site relates to water from surfaces which are mainly roofed with some areas for minor pedestrian traffic. This naturally means that there won't be any generation of oil and grease as it will not be subject to any vehicle access.</p> <p>The change in usage of the exposed site area would also mean a significant reduction in suspended solids, sediment etc which then means a significant reduction to the discharge of Total Phosphorous, and Nitrogen. In the consultant's opinion, the runoff from the roof area is largely fresh water and when discharged into the rainwater tank in the configuration shown on our concept plans, it would have any sediments removed from the site discharge. This would mean that the requirements as set out in the EPA guidelines would be met by this change of usage and that MUSIC modelling (or similar) is not required in this; situation.</p>
Pollutant	Requirement															
Suspended Solids	80% reduction of the average annual load															
Total Phosphorous	45% reduction of the average annual load															
Total Nitrogen	45% reduction of the average annual load															
Litter	Retention of litter greater than 50mm for flows up to 25% of the 1 year ARI peak flow															
Coarse Sediment	Retention of sediment coarser than 0.125mm for flows up to 25% of the 1 year ARI peak flows															
Oils and Grease	In areas with concentrated hydrocarbon deposition, no visible oils for flows up to 25% of the 1 year ARI peak flow															
44.	<p>(Sydney Water)</p> <p>It is unlikely that the onsite detention tank and rainwater tank alone will meet the above requirements. There is no treatment of oils and greases from the driveway or parking areas prior to discharge, it also does not appear that these flows are even screened or have sediment collected as they need to bypass the onsite detention and rainwater tank to avoid contamination.</p> <p>The water quality discharge should be preferably assessed against the above criteria using a model such as MUSIC. This may require the installation of additional proprietary treatment systems to achieve these</p>	<p>The hydraulic consultant notes the comments relating to the flood study. However, it should be noted that this study is not an analysis of rising water but of a small catchment with flows being contained within the kerb bypassing the proposed development.</p> <p>The consultant's comments relating to the concerns and/or revisions to the Flood Study are:</p>														

	<p>criteria.</p> <p>The flood study should be revised to account for:</p> <ol style="list-style-type: none"> 1. a higher 'n' value than 0.012 for asphalt (typically 0.013 to 0.015) 2. a restriction in flow area due to vehicles parked along the kerb 3. a typical 10% minimum increase in rainfall intensities to account for climate change 4. consideration of storm events other than 90min. It is not clear that the 90min storm provides the peak discharge for such a small catchment 5. a reasonable freeboard to the building (note the 26.7m floor level along Gibbons Street appears too low compared with the top of kerb level of 27.29m to the north <p>Sydney Water requests <i>the provision of positive covenants over the detention and water quality treatment systems to ensure ongoing maintenance of these devices.</i></p>	<ol style="list-style-type: none"> 1. The additional roughness value of 'n' being amended to a value of between 0.013 to 0.015 is a more accurate value it would only have a miniscule effect of raising the water level by probably a couple of millimetres; 2. Parking is not allowed along this frontage to the site 3. These increases in flows will only have ,a minimal effect on the water level because of the small catchment 4. The WBNM analysis included all storm events and the 90 minute storm event shown was the worst case 5. The level discussed of RL27.29 is opposite an opening to the building where the floor level is at RL27.80 which is over 0.5m of freeboard. The footpath has an approximate 4.5% crossfall from the top of kerb to the boundary along this frontage which would redirect any minor flows that may splash above the kerb back into the kerb. Any entrance to the retail shops would be located to benefit from this crossfall and as such the floor levels at openings should have at least 0.2m of freeboard. <p>The consultant considers that the 'Flood Study' (for want of a better term) doesn't require any further revisions as the analysis whilst simplistic is suitable for the circumstances.</p> <p>It is considered that the issue of ongoing maintenance should not be the subject of a covenant but a condition of consent</p>
--	--	--

45.	<p>(Transport and Infrastructure) If approval is granted to this application, NSWTI requests that any conditions address the following key matters:</p> <ul style="list-style-type: none"> • The provision of satisfactory pedestrian and bicycle access across Gibbons Street at Marian Street • The provision of a taxi stand at the site, ideally adjacent to the frontage; • Allocating a conveniently located car parking space for a shared car; • The preparation of a workplace travel plan for future commercial tenants prior to the occupation; and • The preparation of transport access guides by the proponent for future residents. 	<p>Noted. The first two matters are noted and should be referred to Council</p> <p>The allocation of car spaces will be to specific units. No shared cars are proposed for the subject development.</p> <p>The requirements for Workplace Travel Plans and Transport Access Guides can be made a condition of consent</p>
46.	<p>(Transport and Infrastructure)</p> <p>Parking</p> <p>NSWTI recommends a minimal level of parking compared to that proposed in the Environmental Assessment (EA) as the subject site is highly accessible to public transport with further improvements planned, a significant portion of supermarket customers are likely to work or live in the vicinity of the site and the locality has the low car ownership. The walking and cycling catchment of the supermarket will continue increasing with the ongoing improvements to the connectivity for people on foot and bicycles as part of implementing the Redfern-Waterloo Built Environment Plan.</p> <p>The subject location would support a transit oriented approach to retail development. The assessment should provide further surveyed car parking demand for supermarkets in the immediate area and in similar highly accessible locations such as St Leonards, Town Hall and Cleveland Street, Surry Hills and consider a further reduction of the parking provision as a key travel demand management measure.</p>	<p>Noted. See response at Item 11</p>

47.	<p>(Transport and Infrastructure)</p> <p>Pedestrian & bicycle access In view of the increased traffic to be generated by the ongoing development of the area, the assessment should address the pedestrian and bicycle connectivity at a greater level of detail. Primarily it should incorporate and provide details of:</p> <ul style="list-style-type: none"> • The new signalised pedestrian and bicycle crossing of Gibbons Street at Marian Street. The provision of this crossing is crucial to achieving the Government strategic objectives and targets as outlined above; • How the development will contribute to implementing the planned and upgrading the existing local and regional bicycle access links in the vicinity of the site; • Bicycle parking provision, including the supply and location of the external bicycle parking to serve the site's visitors. 	Noted. This is a matter for Council and the Minister
48.	<p>(Transport and Infrastructure)</p> <p>Integration with the Redfern Station Integration of the site with a station is an important aspect of the connectivity. Providing a new crossing of Gibbons Street at the Marian Street alignment will help achieve the physical integration with the station and development at North Eveleigh.</p>	Noted. This is a matter for Council and the Minister
49.	<p>(Transport and Infrastructure)</p> <p>Workplace travel planning The minimal parking provision should be further explored through a work place travel planning process to be completed prior to construction. It is suggested that work place travel plans include the goals; objectives; definition of the problem; strategy design; detailed design and monitoring and review processes.</p>	Noted. This can be made a condition of consent.
50.	<p>Submissions from the general public</p> <p>The following is a summary of public submissions from residents in the vicinity of the site in Regent St, Turner St, Margaret St and Cope St as well as purchasers of units in the yet to be constructed adjacent development on the RSL site in Gibbons St. The comments are as follows:</p>	

	<p>a) 18 storeys is too high</p> <p>b) Height of building is out of scale with surrounding buildings;</p>	<p>a) Height : The maximum height of 18 storeys for the subject site has been established by the Redfern Waterloo Built Environment Plan and Schedule 3 of the Major Project SEPP. The height of the proposed development at 18 storeys is consistent with consistent the BEP and the Major SEPP controls.</p> <p>b) Height not in Context with surrounding Area: The subject site is a Significant Site (Site E; Redfern Railway Station, Gibbons St and Redfern St) within the RWBEP and within a broader area that is in a transition phase of significant growth as part of the redevelopment of the Redfern-Waterloo. Other than the Lawson Street Towers at 12 storeys, the existing built form is characterised primarily by low rise 2-3 storey commercial, retail, residential and industrial uses.</p> <p>The Redfern Waterloo Built Environmental Plan (RWBEP) encourages the intensification of development and identifies the heights of development within the area ranging from 3 storeys, adjacent to the Redfern Railway Station, to 18 storeys for the 3 nominated sites, including the subject site, along Gibbons St.</p> <p>The height of 18 storeys of the subject development is consistent with the BEP and is therefore considered to be appropriate and compatible with the desired future character of the area.</p>
--	---	--

c) The proposal will cast shadows which will have detrimental impacts

c) Shadows:

Members of the public who live in Regent St, Turner St, Margaret St and Cope St have submitted that they will be detrimentally impacted by shadows arising from the proposed development.



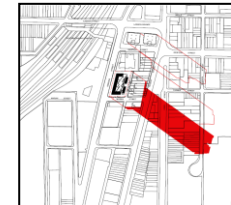
21 March/September Noon



21 June Noon



21 March/September 3pm



21 June 3pm

Shadow Diagrams are attached in Attachment A and are reproduced above.

Comment:

The extent of overshadowing is consistent with that generated by the building envelope controls established by the Redfern Waterloo Built Environment Plan by way of its FSR, height and podium setback controls.

Turner St

- Properties in Turner St will not be affected by shadows from the subject development between 9am and 3pm except for minor overshadowing within the westernmost portion of Turner St after approx 2.30 pm 21st March/September.

		<p>Cope St (East)</p> <ul style="list-style-type: none"> affected for approx. 1 to 1.5 hrs in mid winter. <p>Margaret St</p> <ul style="list-style-type: none"> properties to South of Margaret St are minimally affected for approx 1 hour in mid winter properties on North side of Margaret St are affected for between 1.5hrs and 2 hrs in mid winter Notwithstanding the impact of the subject development, the block bounded by Margaret, Gibbons, Marian and Regent Streets is planned to be developed to 18 storeys. This will have a significantly greater shadowing impact than the subject development. <p>Regent St</p> <ul style="list-style-type: none"> properties on West side of Regent St (south of Marian) are affected by the subject development for approx. 1.5 to 3 hours in mid winter properties on the West side of Regent St (north of Marian) are affected by the subject development between 12.00pm and 3.00pm, although the additional shadows from subject site are negligible once the shadows of the RSL site redevelopment properties on East side of Regent (bounded by Cope) are affected by approx. 1 hr to 2.5 hrs (northern end) <p>Analysis of the shadow diagrams indicates that shadows from the proposed development will travel across the width of any individual affected allotment generally between 1 hour and 2.5 hours. Some properties in Regent St will be affected up to 3 hrs in mid winter.</p> <p>However, these periods of overshadowing represent the time during which shadows from the subject development are cast onto the sites of allotments in the area. They do not represent the extent of overshadowing of windows of living</p>
--	--	---

	<p>d) Owners of units in the adjacent development on the RSL site at 157 Redfern St are concerned that the unit mix of studios, 1 and 2 bedrooms will attract students and otherwise transient residents and give rise to a negative impact in the area and lower the housing value;</p> <p>e) The hundreds of carparking are sub-optimal given the proximity to public transport;</p>	<p>rooms on those allotments.</p> <p>Window openings in walls of buildings in the area generally do not extend for more than 50% of the wall width. This is considered to be a conservative figure; the percentage of wall length occupied by windows is more likely to be around 33% or less. Consequently, on the conservative basis that 50% of the width of a wall is occupied by windows of living rooms, the impact of overshadowing (from the subject development onto windows of those sites within the shadow plane of the development) is generally between 0.5hrs and 1.25hrs in mid winter; with some living room windows in Regent St being impacted for approx 1.5hrs.</p> <p>The extent of impact of overshadowing on affected sites is considered to be acceptable and consistent with the extent of overshadowing anticipated by the Redfern Waterloo Built Environment Plan.</p> <p>d) Unit Mix: The unit mix within the proposed development reflects the anticipated demand for housing choice in the area. The site is close to a number of tertiary educational institutions (Sydney University, UTS and Sydney TAFE). It is therefore likely that students may seek accommodation within the proposed development.</p> <p>Whilst the development has not been designed for student accommodation, it is not within the power of the developer to restrict the type of owner or tenant within the development.</p> <p>Indeed it is highly likely that students may seek accommodation in the adjacent 157 Redfern St development (the source of the objection). It is considered unlikely that student owners/tenants will have a significant, if any, effect on the value of units.</p> <p>e) Excessive Carparking The on-site carparking numbers proposed within the development is considered to represent a balance between</p>
--	---	---

	<p>f) Insufficient carparking is being provided for residents of the building and the tenants of the Lawson Towers;</p> <p>g) Impact of loading facilities near the Marian St/William Lane intersection. There appears to be inadequate area within the loading dock to enter and leave in a forward direction;</p> <p>h) The development will diminish views and existing direct sunlight to units in 13-23 Margaret St. Consequently the property will lose value ;</p> <p>i) Increase in traffic and noise; the latter of which will be reflected into the surrounding neighbourhood;</p>	<p>the needs of the occupants and visitors of the development and the minimisation of carparking having regard to the proximity of the site to Redfern Railway station and various bus routes. See also comments in Items 11 and 12.</p> <p>f) Insufficient Carparking See comment above in item 51 (e)</p> <p>g) Loading facilities/Inadequate Turning Areas The traffic consultant has demonstrated that turning circles within the site are satisfactory. See item 22.</p> <p>h) Loss of Views, direct Sunlight and Property Value The scale and form of the proposed development complies with the urban form controls established by the Waterloo Redfern Built Environment Plan (BEP) and the Height and FFSR controls of Schedule 3 of the SEE Major Projects.</p> <p>In this regard, the impacts of views and solar access were addressed as part of the plan-making process and public exhibition of the BEP.</p> <p>It is therefore considered that the impacts of views and solar access are satisfactory. Moreover, the block to the south of the subject site, incorporation a frontage along Margaret St, is planned to accommodate an 18 storey building which is likely to have a significantly greater impact on views and solar access than the subject development.</p> <p>i) Increase in Traffic and Reflected Noise The increase in traffic has been established to have no significant impact on the operation of the surrounding road network.</p> <p>In terms of the impact of reflected traffic noise, it is considered that traffic noise increase attributable to the subject</p>
--	---	--

	<p>j) The supermarket use is likely to put pressure on existing on-street carparking spaces;</p> <p>k) The development will create more pedestrian movements in the area and will likely give rise to more graffiti and vandalism'</p>	<p>development will be insignificant.</p> <p>j) Inadequate Carparking for Supermarket See comments at Item 11.</p> <p>k) Increase in Graffiti and Vandalism It is considered that the increase in pedestrian movement attributable to residents within the proposed development and other new developments in the area, is likely to cause a decrease, rather than increase, in graffiti and vandalism as a result of on street activity and surveillance.</p>
51.	<p>(Redfern Waterloo Authority)</p> <p>Non-compliance with State Environmental Planning Policy (SEPP) (Major Development) 2005</p> <p>The EA indicates that the proposal does not comply with the maximum 7:1 floor space ration (FSR) control applying to the site under Clause 21(2) of Part 5, Schedule 3 of SEPP (Major Development) 2005. According to the Environmental Assessment (EA) the non-compliance consists of an additional 152sqm of floor space, attributed to the communal recreational facilities on level 2 of the building. The EA refers to the provisions of the City of Sydney (CoS) Local Environmental Plan (LEP), which allows communal recreational facilities to be excluded from the calculation of floor space for the purposes of determining the FSR. However, as the EA identifies the CoS LEP does not apply to this site or other RWA sites.</p> <p>While the RWA notes the minor nature of the non-compliance, it is our understanding that variations to the height and FSR controls applying under Clause 21 of the SEPP, can only be considered by the Minister for a part 3A Concept Plan application. This being the case, there is no mechanism for varying the FSR or height for a Part 3A Major Project application. The RWA will be guided by the Department on this matter.</p>	<p>The plans have been amended to reduce the FSR to 7:1 which complies with the maximum permissible FSR. Consequently, no SEPP1 objection is required.</p>

54.	<p>(Redfern Waterloo Authority)</p> <p>Car parking</p> <p>General comments</p> <p>The RWA notes that the car parking provision is up to the maximum specified within the South Sydney Development Control Plan No.11 Transport Guidelines for development. The RWA acknowledges there is currently no car parking policy applying to the subject site, or other RWA sites within the Redfern Centre, and DCP 11 has been used as a guide for parking provision to date. However, given the site accessibility to Redfern Station and bus services, as well its proximity to the CBD and other key employment nodes, such as Australian Technology Park, a more constrained car parking provision should be considered. This is particularly relevant given the targets established by the NSW Government in the NSW State Plan 2010 to increase the share of commuter trips made by public transport, cycling and walking by 2016.</p> <p>Supermarket car parking</p> <p>The Traffic Impact Assessment (TIA) prepared by Traffix and the EA, both indicate that the car parking rate of 4.2 spaces/100 sqm adopted for the supermarket is based on DCP 11 and the RTA Guidelines (refer to Table 2 of the TIA and Table 4 of the EA). The RWA cannot find any reference to this figure in the DCP. The RWA considers the car parking rate excessive given the sites accessibility to public transport and that the supermarket is likely to service the local resident and working population. On this basis the RWA does not support the establishment of a supermarket that is based on a "car dependent model" as identified in the TIA and EA. The IGA on Regent Street/Botany Road Waterloo, which is a comparable size to proposed supermarket, has no off-street car parking and does not benefit from the same public transport accessibility.</p> <p>Further to the above, the approved Part 3A Concept Plan for the North Eveleigh site, which was prepared by the RWA, includes a car parking rate of 1/125sqm for retail floor space, which was to include a supermarket. The North Eveleigh site is located to the west of the subject site, on the opposite side of the railway corridor, and benefits from a</p>	<p>A review of DCP 11 indicates that the carparking and loading provisions are "guidelines" not maximum or minimum provisions.</p> <p>An extract of the DCP 11 Objectives is reproduced below:</p> <div data-bbox="1218 571 2045 651"> <p>The parking rates of these Guidelines offer a balanced compromise by satisfying a large proportion of parking demand on-site, addressing car reduction objectives of Council's Strategy, and minimising the unreasonable overflow of parking onto surrounding streets.</p> </div> <p>See response in Items 11 and 12 which indicate the manner in which carparking has been provided for the development, including the proposed Supermarket, and the reduction of 79 car spaces provided for the Lawson Square Tower site.</p>
-----	---	---

	<p>similar level of accessibility to the railway station. The car parking rate of 1/125 sqm was adopted for the Concept Plan to reflect the accessibility of the site to public transport and the intention for a future supermarket to service the local population.</p> <p>Car parking for GCA towers</p> <p>With regard to the 80 spaces proposed for the exclusive use of the Lawson Square Towers (formally TNT Towers). the RWA notes that the number of proposed spaces represents a significant reduction (49%) from the original 156 spaces that were approved on the subject site for the Lawson Square Towers. However, it is important to recognise that the 156 spaces were approved in 1972, at a time when car parking policies were generally aimed at maximising on-site parking provision. In more recent times car parking policies seek to constrain car parking provision, particularly in locations that benefit from good public transport access. Accordingly, the RWA requests details of the existing GFA of the Lawson Square Towers to determine the car parking rate that the proposed 80 car parking spaces equates to and whether it is consistent with the commercial rate of 1 space/125 sqm, which has been adopted for the balance of the development. Additionally RWA would like to ensure there is a legal mechanism to ensure that these spaces are available for the exclusive use of the GCA towers into the future.</p>	<p>Response as above</p>
55.	<p>(Redfern Waterloo Authority) Marian Street</p> <p>Marian Street is identified in the RWA BEP 1 as a key pedestrian link that should be reinforced. This is also reflected in the RWA's draft Design Principles for the Redfern Centre. The proposed combined loading/car park access occupies around 50% of the Marian Street frontage. It is considered that this has the potential to compromise the pedestrian amenity and safety along Marian Street, particularly as it becomes a more popular pedestrian route. The RWA considers that a separated loading and car park entrance would be preferable, with one access be accommodated on William or Gibbon Street. However, we acknowledge there are constraints associated with the location of the loading access in order to accommodate large vehicles to service the supermarket.</p>	<p>The level of vehicular traffic movements to and from the site (AM Peak: 86 in and 43 out. PM Peak: 103 in and 121 out) is not considered to compromise pedestrian safety.</p> <p>A vehicular access in William St is not practical and would not alter the nature pedestrian/vehicular conflict as it would still result in the same number of vehicular movements entering and exiting the site and therefore the same number of vehicular movements for pedestrians to accommodate while walking down the northern side of Marian St.</p>

	<p>Notwithstanding, the RWA remains concerned that pedestrian safety and amenity on Marian Street will be reduced, particularly in terms of the potential for increased pedestrian and vehicle conflicts. As such further consideration must be given to this issue at this stage of the process, and not during a post consent detailed design process.</p>	
56.	<p>(Redfern Waterloo Authority)</p> <p>William Lane Elevation</p> <p>While the RWA have previously identified William Lane as potential vehicle access for future development and not major pedestrian access, the proposed treatment of this elevation is considered inappropriate. The inactive frontage is exacerbated by the selection of materials which present a completely blank facade to the laneway at street level. This proposed William Lane facade when combined with the large vehicle access proposed on Marian Streets results in large area of inactive building facade at street level, which is inconsistent with BEP 1 and the draft Redfern Centre Urban Design Principles.</p>	<p>The detailed design of William Lane facade is being reviewed. However, the activation of William Lane at ground level is impractical as the ground level use within the development at ground level is a loading dock.</p>
57.	<p>(Redfern Waterloo Authority)</p> <p>SEPP 65 — Residential Flat Design Code</p> <p>A SEPP 65 compliance checklist has been provided with the Design Verification Statement. However, clarification is required on the extent of compliance with respect to the following matters.</p> <p>Storage</p> <p>The checklist indicates that the proposal complies with the storage requirements included in the "rules of thumb". However, we have been unable to clearly determine where this storage would be located. We note that the plans show "plant/storage areas" within the basement levels; however resident storage must be clearly separate from plant areas.</p> <p>Residential lobby</p> <p>The Code recommends providing separate entries for different uses, yet</p>	<p>The drawings of the development have been revised to show dedicated storage areas within the basement levels.</p>

	<p>the entrance to the residential apartments, commercial uses and supermarket lift access are all via a single entrance from Gibbons Street. It is considered preferable for the apartments to have a separate entry from street level.</p> <p>It is further noted that some of the entrances are recessed/slightly setback from the building line. To maximise visibility and minimise opportunities for crime and anti-social behaviour it is preferable for the entrances to be located at the building line.</p> <p>Light wells</p> <p>The Code recommends limiting the use of light wells as a source of daylight by prohibiting their use as a primary source of daylight to habitable rooms. However, the proposed light wells are the only source of daylight for several of the bedrooms facing the east.</p> <p>Aesthetics — materials and finishes</p> <p>The RWA is unsure of some of the materials and finishes and there use in certain locations (e.g. William Lane elevation as discussed above). The RWA needs to review samples of the actual materials and finishes.</p> <p>Dwelling Amenity</p> <p>The level of amenity that will be achieved for some of the 1 bedroom apartments is questionable where the only source of ventilation/light is via the living rooms windows. While the layout of these apartments allows for flexibility, with inclusion of sliding/retractable bedrooms walls, the RWA questions whether this will provide adequate amenity.</p>	<p>A separate lobby has now been provided</p> <p>Design has been amended</p> <p>Building regulations consultants, City Plan Services, have reviewed the adequacy of light and ventilation in n rooms facing the lightwell on the eastern portion of the building. In their report (Attachment G) they have concluded that the lightwell is not necessary for the provision of satisfactory levels of natural light and ventilation. These are provided through borrowed light and ventilation via the open walkway on the eastern side of the building. Any additional nigh and ventilation provided by the lightwell adjacent to the relevant units is in addition to that provided by the open walkway.</p> <p>Samples of materials and finishes have been provided to the Department of Planning as part of the Environmental Assessment submission.</p> <p>The proposed bedroom design has been used extensively throughout Sydney on various projects and complies with the provisions of the BCA</p>
--	---	--

58.	<p>(Redfern Waterloo Authority)</p> <p>Cyclist facilities</p> <p>The EA states that bicycle parking is to be provided in accordance with DCP 11 and bicycle parking is shown within basement levels on the architectural plans.</p> <p>The EA further notes that change room facilities will be provided, but these are not shown on the plans.</p> <p>In order to seriously encourage cycling as a transport option, it is necessary to ensure that adequate cycling facilities are provided for this development. Accordingly, the RWA requires confirmation that the required bicycle parking, the amount of which has not been identified, can be accommodated in suitable locations according to the users (i.e residential /non-residential). In addition, the RWA requires further details of where other cyclist facilities, such as secure lockers and change rooms for staff, will be located.</p>	<p>Bicycle parking and change room facilities are now shown on the plans.</p> <p>80 cycle spaces are provided which exceed the requirements of South Sydney DCP 11 as follows:</p> <p>Retail: 8.3 (10% of parking demand (83)) Commercial: 4.3 (870 sqm /10 sqm per occupant; 87 /20=4.3 Residential: 65 (50 +15) – 1 space per 3 units + 1 space per 10 units for visitors TOTAL: 77</p> <p>NUMBER OF BICYCLE SPACES PROVIDE : 80</p>
59.	<p>(Redfern Waterloo Authority)</p> <p>ESD</p> <p>The ESD Report prepared by Jones Nicholson Pty Ltd includes a BASIX assessment, as well as assessment of the SEPP 65 sustainability principles and RWA Built Environment Plan (BEP) ESD strategies. Consistent with the BEP 1 ESD strategies, the RWA requests details of the non-residential components of the buildings performance against best practice targets, such as Green Star or NABERS.</p>	<p>Jones Nicholson Pty Lt has made the following comments in their report at Attachment J</p> <p>“The non residential components of the building include the ground level retail tenancies, level 1 supermarket and the level 2 commercial office tenancies.</p> <p>There are currently no Green Star or NABERS rating tools that are designed for retail tenancies or supermarkets. There is a Green Star tool for Retail Centres, but this tool is for a large shopping centre and is not considered appropriate to this development. Commercial office tenancies of this size would not typically be assessed under Green Star or NABERS.</p> <p>Although Green Star and NABERS are not considered appropriate, the development has implemented many of the initiatives from each of these rating tools;</p> <ul style="list-style-type: none"> - Energy Efficiency <ul style="list-style-type: none"> o Highly efficient Reverse Cycle VRF Air Conditioning

		<ul style="list-style-type: none"> ○ High performance single glazed - Water Conservation <ul style="list-style-type: none"> ○ Efficient fixtures - Waste Management (during construction and ongoing) <ul style="list-style-type: none"> ○ Separate areas for separation, collection and recycling of all waste generated - Sustainable Materials - Reduced Car Dependence <p>The extent of the above measures recommended in the ESD Report was based upon the Green Star rating system. It would therefore be expected that the non residential component could be equivalent to a 4 star best practice Green Star rating".</p>
60.	<p>(Redfern Waterloo Authority)</p> <p>Wind</p> <p>Wind is a major problem within the Redfern Centre. To ensure that the existing wind conditions within the public domain will not be exacerbated, the RWA requests that the Department of Planning commission an independent assessment of the Wind Environment Study prepared by Windtech. The RWA requires confirmation that the findings of the Windtech assessment are correct and recommended wind mitigation measures are adequate to ensure no adverse wind impacts will arise from the proposal</p>	<p>Noted. This is a matter for the Department of Planning. However, a second wind report is not considered necessary.</p>
61.	<p>(Redfern Waterloo Authority)</p> <p>Social Cohesion</p> <p>The promotion of greater social cohesion is one of the objectives of the RWA under the Redfern-Waterloo Authority Act. Encouraging a greater social mix within the Redfern-Waterloo area is the key to achieving social cohesion. This can only be achieved by providing a range of housing options. As the proposal is predominantly comprised of studio and 1 bedroom apartments and includes no 3 bedroom apartments, the RWA is concerned that this will not contribute to a greater social cohesion.</p>	<p>See response in Item 8</p>

62.	<p>(Redfern Waterloo Authority)</p> <p>Redfern Waterloo Contributions Plan</p> <p>The RWA notes that the applicant is proposing to undertake public domain works on Gibbons Street in lieu of payment of a contribution in accordance with the Redfern Waterloo Contributions Plan. As the Department would be aware a proposal to carry out proposal to carry out works in lieu of payment of a contribution must form part of a planning agreement. Accordingly, the RWA requests that any such offers be dealt with through the imposition of a condition consistent with the condition included on the Instrument of Approval for the Major Project application for the redevelopment of the RSL club.</p> <p>Notwithstanding the above; as with major developments that occur throughout the City of Sydney LGA, the RWA would expect the footpath along Gibbons/Marian Street would be reinstated to a certain standard as part of the overall development, separate from any additional works that may be undertaken in accordance with the Contributions Plan.</p>	<p>The developer has forwarded a letter of offer regarding a Voluntary Planning Agreement (VPA), made in accordance with Section 93I(3) of the EP & A Act.</p> <p>The terms of the offer is to pay the 2% levy as per the RWA Constitutions Plan 2006, as well as undertake public domain works in Gibbons St (paving and landscaping) on the basis that these works will be offset against the 2% levy.</p> <p>The VPA will be entered into entered into within 6 months of the date of approval of the subject application.</p> <p>Reinstatement of footpaths, other than works undertaken in accordance with the Contributions Plan, can be made a condition of consent</p>
63.	<p>(Sydney Airport Corporation Limited)</p> <p>Sydney Airport Corporation Limited has requested that they be provided with the MGA 94 Co-ordinates for the major corners of the proposed development. The development penetrates the OLS – conical surface & the PARM Radar Surface but being able to position the building by co-ordinates would assist in determining more accurately the amount of penetration of both the OLS and the PARM Radar Surfaces.</p> <p>These details will be sent to o Airservices, CASA and the Airlines for their assessment/comments and then sent to the Department of Infrastructure for its determination as the Development is a “Controlled Activity”.</p>	<p>A Survey of MGA 94 co-ordinates of major corners of the proposed development has been undertaken and is at Attachment L to this report.</p>