

5 December 2022

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Renah Givney
Senior Planning Officer
Key Sites Assessments
Department of Planning and Environment

Via Planning Portal

Dear Renah,

SSD-32275057 – Redfern Mixed Use Co-living Development – Advice on EIS

Thank you for your correspondence dated 1 November 2022 inviting the City of Sydney Council ("the City") to comment on the proposed State Significant Development (SSD) application for a new co-living housing development at 175-177 Cleveland Street, 1-5 and 6-8 Woodburn Street, Redfern.

It is understood that amalgamation with 6-8 Woodburn Street has been explored and is proposed to provide for a more consolidated scheme than what was provided under the previous SSD on site (SSD-1072865).

Despite this, City officers have reviewed the subject application and have identified concerns with key aspects of the proposal that were similarly raised with the previous SSD, particularly regarding the suitability of the site for residential development and significant amenity issues.

In summary, the City objects to the proposal and raises the following points for your consideration with detailed information contained with the following sections:

1. Suitability of the site and non-compliance with key development standards
2. Design excellence and urban design
3. Residential amenity
4. Public domain
5. Public art
6. Ecologically sustainable development
7. Landscaping
8. Car, motorcycle and bicycle parking
9. Servicing, waste and access

1. Suitability of the site and non-compliance with key development standards

The site is subject to the provisions of the *State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021 – Redfern-Waterloo Authority Sites* ("the Eastern Harbour City SEPP"). The site is located within the Business Zone – Mixed Use and is subject to a maximum FSR of 3:1 with the maximum permissible FSR for the residential component within that being 1:1. It is understood that the aim of this type of control is to encourage commercial and mixed-use developments and limit residential development. A maximum height control of 5-storeys is also applicable to the site.

It is noted that an additional 10% of the maximum FSR (if the additional floor space is used only for the purposes of co-living housing) is permitted under Clause 68(2)(a)(ii) of the *State Environmental Planning Policy (Housing) 2021 – Part 3 Co-living Housing* (“the Housing SEPP”).

The application proposes a total FSR of 3.47:1, with 3.01:1 proposed for the residential use and 0.46:1 for the commercial use, which exceeds the FSR development standard under both the Eastern Harbour City SEPP and the Housing SEPP. The application also proposes a maximum height of 7-storeys, which exceeds the 5-storey height control.

The proposal seeks significant departures from both the FSR and height development standards and submits a variation request in accordance with Clause 16A of Appendix 3 of the Eastern Harbour City SEPP. **The City does not agree that the variation request provides adequate justification of the departures from the key development controls.**

Most relevantly, the following aspects are not sufficiently demonstrated:

1.1 Unreasonable or unnecessary

The variation request seeks to establish that compliance with the development standard is unreasonable or unnecessary utilising Wehbe Tests 1 and 4, respectively being that (1) the objectives of the standard are achieved notwithstanding non-compliance with the standard and (4) the development standard has been virtually abandoned or destroyed by the Council’s own actions in granting consents departing from the standard.

1.1.1 *Wehbe Test 1 – Objectives of the standard*

The Eastern Harbour City SEPP does not detail objectives for the FSR or height in storeys development standards, however it is the City’s understanding that:

- The FSR development standard is structured in such a way to encourage commercial development over residential development, and it is then reasonable to assume that this is an underlying purpose of the development standard. As the residential proportion is further restricted on sites in close proximity to Cleveland Street, which is a very busy road in this location, this is likely to be due to residential amenity concerns.
- The 5 storey height control permitted for the site allows for a transition to the lower scale to the west and south.

The application fails to limit residential development within the Business – Mixed Use zone and contravenes the underlying purposes of the development standards. Further, the application is not consistent with the objectives of the Business – Mixed Use zone as:

- A limited mix of uses are proposed, with some commercial/retail at ground level and the provision of co-living residential units above only.
- The proposed residential development has conflicts with the non-residential development given that there are no public to private transitions within the through site link, as detailed further in the section below.
- The proposal does not ensure the vitality and safety of the community and public domain with the proposed ground level commercial and retail uses located at an excavated (partially below ground level) as well as there being other misalignment of levels with the public domain.

- The proposed development does not achieve design excellence, as discussed in the section below.
- The proposed landscaped and greening areas are not supported by sufficient detail and information to demonstrate if they will be viable and sustainable to enhance the amenity of the area.

As the Eastern Harbour City SEPP does not detail objectives for the development standards, the request discusses how the proposal meets the objectives for the Eveleigh Street precinct contained within the *Redfern-Waterloo Built Environment Plan (Stage One) August 2006* (the Plan). **The City does not agree that the application adequately meets the considerations of Section 4.4 relating to the Eveleigh Street Land Use and Design Concepts for RWA's Strategic Sites.** Specifically:

- The proposal does not reinforce the significance of Redfern as a meeting place and centre for Aboriginal urban life in the uses proposed for the site. The proposal does not address indigenous housing needs. Although it is understood that the application proposes an indigenous roof top farm and states that the multipurpose room will be used for Indigenous cultural activities and practices, detail regarding these areas and uses remains unclear. Further detail is also required regarding the public art strategy (as detailed in the section below).
- The development does not necessarily enhance employment uses with the proposal comprising a heavier delivery of residential development on site, with ground floor retail comprising only 0.46:1 of floor space compared to the residential floor space which is 3.01:1 exclusive co-living use.
- The proposal does not facilitate the development of quality of housing for existing and new residents given that the proposal does not provide for a range of housing types with only co-living rooms proposed.
- The development results in adverse amenity impacts for neighbouring properties and future occupants, with insufficient separation provided and majority of the proposed rooms facing an internal courtyard resulting in significant outlook, visual and acoustic privacy issues.
- The proposed development does not provide an appropriate interface to surrounding development, with excessive bulk and scale that does not relate well the adjacent built form. The proposal presents as a majority 6 and 7-storey built form with a sunken ground level. This presents no transition between the 4 and 5-storey built form to the east, and 4-storey built form to the west. To the rear, the 7-storey form sits directly against the 2-storey terraces to the south of the site as well as the 4 and 5-storey built form of 17 Eveleigh Street. Additionally, multiple projections over the boundary for balconies exacerbate the scale and bulk.
- The proposed built form does not provide a safe, vibrant and cohesive community with the ground level uses located at an excavated level, and the provision of a through site link which is restricted in terms of public access and has safety issues.

1.1.2 *Wehbe Test 4 – The development standard has been virtually abandoned or destroyed*

To demonstrate that the development standards have been virtually abandoned or destroyed, the variation request highlights some previous approvals. The following is noted regarding these:

- SSD 7064 – This consent related to 175-177 Cleveland Street and 1-5 Woodburn Street, Redfern (part of the subject site) and was granted consent by the Land and Environment Court for a mixed used development on site comprising a hotel, residential units, and retail and commercial uses. The built form was 5-6 storeys in height and comprised a total FSR of 3.25:1, with 1.77:1 for the hotel, 1.20:1 for the residential units, 0.19:1 for the retail/commercial tenancies and 0.10:1 for a wine bar. At the time of the assessment of the application, the City objected to the proposed FSR and height exceedances. Despite the non-compliances, it is noted that the development provided for a range in employment uses and mix.
- SSD 6371 – This consent related to 175-177 Cleveland Street, Redfern (part of the subject site) and was granted approval by the Minister for Planning on 28 January 2015 for a mixed-use student accommodation for 40 students and residential development containing 13 units. A compliant building envelope was approved, with the development having a height of 5 storeys and a compliant total FSR of 2.98:1.
- SSD 4949 – This consent relates to 142 Abercrombie Street which is located to the west of the subject site and was granted approval for a student accommodation facility in 2012 which exceeded the 1:1 residential FSR control with a total 3:1 FSR for residential uses. At the time of the assessment of the application, the City strongly objected to the proposed FSR exceedance. A compliant 5-storey height was approved.
- SSD 6724 – This consent relates to 60-78 Regent Street, Redfern, which is approximately 550m south of the site and is not subject to a restriction of residential floor space within its FSR controls.
- SSD 9275 – This consent relates to 70-88 Regent Street, Redfern, which is located approximately 600m south of the site and is not subject to a restriction of residential floor space within its FSR controls.
- SSD 8135 – This consent relates to 77-123 Eveleigh Street, Redfern, which is approximately 265m south of the site and relied on a Concept Approval from 2009.

1.2 Sufficient environmental planning grounds

The City considers that there are insufficient environmental planning grounds provided in the variation request. In particular, the variation request's reliance on the grounds that proposal results in no amenity impacts is not accepted, given the adverse implications of the proposal on future occupants and surrounding sites, as outlined in the sections below. There is no planning purpose served by supporting the variation, as the development does not result in an improved outcome that would not otherwise be achieved by adhering to the control.

1.3 Recommendation

Based on the proposal's non-compliant floor space and height above the permissible maximum storeys, excessive bulk and scale, poor contextual interface to neighbours, and compromised amenity outcomes to residents, the City believes that the site cannot comfortably accommodate residential uses in its current form. The bonus FSR provision available under the Housing SEPP further exacerbates these noted concerns.

The City of Sydney recommend that the application is amended to comply with the FSR and height development standards. At a minimum, the requirement to

provide no more than a maximum residential FSR of 1:1 should be adhered to. Consideration of a commercial floor space scheme is strongly recommended. This would likely achieve:

- Better alignment with the objectives of the zone in the Eastern Harbour City SEPP.
- Better alignment with the land use and design concepts of the Redfern-Waterloo Built Environment Plan August 2006.
- A more easily accommodated maximised FSR as the internal courtyard would not be required to achieve a high daylight amenity plate if a central core were used.
- Compliance with the height in storeys control.
- Opportunities for reduced bulk and scale at neighbouring interfaces.
- Opportunities for an architectural articulation zone which is not reliant upon overhanging the boundary.
- No use pressure for the roof to be a habitable space.

2. Design excellence and urban design

The City is not satisfied that the current proposal satisfactorily meets the provisions for design excellence in Clause 22 of Part 3 of the Eastern Harbour City SEPP, as follows:

- Clause 22 (2)(a): The proposal does not demonstrate a high standard of architectural design and detailing. This overarching requirement is not met as cumulatively the combination of issues identified results in the proposal not achieving a high standard of architectural design.
- Clause 22(2)(b): The proposal does not demonstrate that the form and external appearance will improve the quality & amenity of the public domain. The form is excessive in scale and bulk, does not relate well to neighbouring development and does not positively reinforce the street edge.
- Clause 22(2)(c). The proposal does not meet the required sustainable design principles by proposing poor amenity to rooms in terms of separation, visual and acoustic privacy.

Further discussion regarding how the above provisions are not met, is provided below.

2.1 Bulk and scale

The proposal results in unacceptable bulk and scale, with a non-compliant storey height for primarily residential uses and having non-residential areas at an excavated below ground level. It is required that the maximum 5-storey height is provided, with a ground level that relates to the public domain level and provides for a floor to floor height that is suitable for adaptation for future flexibility. The Sydney DCP 2012 requires 4.5m floor to floor heights for ground level commercial/retail uses.

A reduction in bulk is recommended to both neighbouring interfaces to better relate to existing built form patterns in the streetscape. This could be achieved by a combination of upper level street setbacks which relate to the neighbours and modulated building mass to both interfaces. It is recommended that the 7-storey interface to the southern 2-storey terrace neighbours be seriously reconsidered, given the adverse impacts on these neighbours in terms of solar access and overbearing presentation in terms of bulk and scale.

2.2 Public domain interface and through site link

There are concerns regarding the public domain interface of the proposed through site link. The through site link is proposed to be publicly accessible, however only during set hours of the day. It does not provide a clear line of site from one side to the other, instead relying on a convoluted path through the common open space. It is relatively narrow and not generous in height, being covered by building on the storey above at both street interfaces. The inclusion and viability of the non-residential uses fronting the internal through site link are also questioned, especially the southern tenancy which has a sole frontage to the common open space. The City questions the sense of safety for residents given there are no public to private transitions within the through site link.

The City recommends that the design of the through site link be amended to deliver a genuine public benefit, and provide:

- Cues in the form and massing of the building (i.e., building breaks), to indicate that there is a through site link.
- Direct route and line of site from Eveleigh Street to Woodburn Street.
- Generous clear width and height.
- Non-residential tenancies should face the street frontages solely, and transitions of public to private in the through site link itself should be included (with terraced landscaping, setback well-integrated fencing etc.) to enable both the public and the residents to feel simultaneously welcome and safe in the development.
- Alternatively, the entire ground level should be completely publicly accessible (not time restricted).

2.3 Building expression

The inclusion of all Juliet balconies is questioned given that majority of the balconies are not genuinely useable private open spaces. Any balconies facing Cleveland Street, and potentially Woodburn Street, are likely unusable due to the proposed full height glazing and high permeability balustrades which exacerbate acoustic and visual impacts from very close high volume traffic movements. The large windows with no external shading to north and west facing rooms will also result in further amenity impacts for residents.

The design of fenestration, especially to noise affected facades of Cleveland Street and Woodburn Street, need to balance outlook and solar access amenity, with the need to achieve acceptable acoustic privacy, visual privacy and minimised solar heat gain in summer months.

2.4 Materials and finishes

The material palette which comprises face brick and bronze metal cladding is supported. However, the references to “or similar” should be removed as this may potentially introduce less high quality materials.

The Section J report requires a solar heat gain coefficient of glazing of a minimum of 0.43 which is a performance glazed product and could lead to the use of heavily tinted glass. The City requires the use of clear glass.

3. Residential amenity

The proposed development results in poor residential amenity for future occupants, as discussed further below.

No details are provided regarding how noise affected facades are to achieve both acoustic attenuation and natural ventilation simultaneously.

3.5 Room sizes

Room type E4 has inadequate circulation for residents to get into their bed.

3.6 Recommendations

To improve the amenity outcomes for future occupants, it is recommended that the following changes be made:

- The size of the courtyard is to increase to improve the amenity of rooms reliant on this aspect and provide a minimum separation of 12m, by removing a number of courtyard-facing rooms. This will also likely increase solar access received at midwinter.
- Operable external privacy treatments be provided to any courtyard rooms to enable user-controlled privacy and ensure that solar access to the rooms is received.
- Open gallery circulation is to rely upon architecturally integrated privacy devices, not landscaping to mitigate any privacy issues.
- Natural ventilation assertions are to be supported by a natural ventilation assessment prepared by a suitably qualified expert.
- The alternative attenuated ventilation strategies required to all facades facing Cleveland Street and Woodburn Street (as stated in the submitted acoustic report) needs to be fully detailed to those noise affected facades to ensure adequate ventilation amenity. Currently what is provided does not confirm this being achieved.
- Room type E4 (double room) is to be redesigned to provide adequate circulation for residents to get into their bed.

4. Public domain

The City raises the following matters for your consideration in relation to proposed works affecting the public domain:

4.1 Projections

Projections of the balcony structures do not comply with Schedule 4 of the Sydney DCP 2012 which specifies that projections comprise no more than 50% of any road frontage of the building at any level. It is also noted that the proposed projections may conflict with the existing power pole and wires on Eveleigh Street.

4.2 Public domain levels and gradients

The Stairs on the Woodburn Street footpath must be removed and replaced with a standard footpath complying with City's specifications. The building design must be adjusted to accommodate this level change.

4.3 Future cycleway

A contraflow cycleway has been proposed by the City in Eveleigh Street. The public domain works for this site must coordinate with City's cycleway and traffic safety strategies to deliver a better-balanced outcome to accommodate the increased pedestrian and vehicle flows and ensure safety for pedestrians and cyclists.

4.4 Public Domain Concept Plan

Additionally, it is noted that Public Domain Concept Plan will be required for the City's approval following any determination of the application. The Plan must address the following recommendations:

- Continuous Footpath Treatments (CFT) on both Eveleigh Street and Woodburn Street. CFT design is to match the existing ones at the opposite side of Cleveland Street, i.e., Chippen Street.
- Footpath widening on Eveleigh Street to the full length of the western site boundary.
- Removal of the on-street parking on Eveleigh Street frontage.
- A contraflow cycleway on Eveleigh St between Cleveland Street and Hudson Street, along with a mix traffic lane as per existing traffic flow (including signages and pavement markings).
- Street tree planting in footpath on Eveleigh Street.

5. Public art

The submitted Public Art Strategy is considered to be relatively brief and high level. It calls out the opportunities for integrated elements identified through the consultation process and, in addition to this the plans (but not the text), reference the water feature in the internal courtyard to be developed and delivered by a “a local Indigenous female artist” as noted in the Connecting with Country Report.

The site is home to two existing murals, the Greg Inglis and Stolen Generation Girl Murals. It is understood that the application seeks to remove these murals as part the demolition of the site to make way for the new development, however, also seeks to potentially use artefacts from the existing murals as part of the interior design for the new development. The City queries how this will work, as it is not currently detailed in the documentation submitted.

It is recommended that the Public Art Strategy be amended to ensure all the relevant information regarding public art for the site is included. The Public Art Strategy should include:

- All opportunities for artists across the site (noting that only those that are accessible or highly visible from the public domain will satisfy the City's requirements for public art in new developments).
- Propose a methodology for the selection and commissioning of artists.
- Outline how Indigenous Cultural and Intellectual Property (ICIP) will be addressed given the opportunities are solely for First Nations Artists.
- Provide an estimated budget and program for the inclusion for public art.
- Clearly identify existing artworks on the site and outline the process for their removal/demolition/destruction/reuse in line with moral rights and best practice. If they are to be reused, then the process and methodology for this should be included and consultation with the original artists is recommended as per best practice.

6. Ecologically sustainable development

Whilst the application outlines some positive design features, there are inconsistencies across the reporting and commitment to initiatives. Additionally, the outlined targets within the SEARs response have not been met. Further detail is provided as follows:

6.1 High performance building envelope

The submitted ESD reporting has outlined a targeted 24% improvement on Section J targets, along with the use of high performance (thermally improved) window systems. However, the submitted BASIX report does not reflect this with the largest component of the project not achieving a system U-Value that would align with the initial target. The facade calculator outlines an achieved U-value of 1.87 whereas the NCC Section J target is 2.0 (maximum). A similar outcome has been achieved for the retail component of the development, where there is an achieved U-value of 1.99, and a maximum allowed of 2.0. The glazing to the residential component is also proposed to be single glazed clear, which again doesn't reflect the outlined target.

It is recommended that the design be amended to achieve the building fabric targets proposed in the ESD Report. The targets are outlined in Section 2.2 - Design Response to SEARs Requirements.

6.2 Energy efficiency appliances and service systems

In response to SEARs ESD requirements, the reporting has outlined the intended installation of high efficiency appliances and air-conditioning systems. This commitment is relatively vague and further is not reflected in the BASIX report. The project has committed to the installation of 2-Star Refrigerators and AC systems with a proposed EER of <2.5. Each of these targets are amongst the lowest available options under BASIX and do not represent high efficiency installations.

It is recommended that the design incorporate the installation of appliances or service systems in line with targets outlined in the SEARs response.

6.3 On-site solar generation

Solar photovoltaics are proposed however reporting around this initiative is inconsistent. The PVs are shown on the architectural plans and the ESD report quantifies a target power generation, however this reporting is not reflected in the BASIX commitments.

It is recommended that this commitment be identified on the BASIX certificate, to further commit the development to this positive design outcome.

6.4 Remove reliance on fossil fuel usage

The ESD report's response to SEARs has outlined specifications for a fully electric development, with no use of fossil fuels on site. However, this is not consistent in other reporting, with the BASIX report outlining the use of a gas fired boiler for domestic hot water.

The electrification of the development is a positive design outcome. The BASIX certificate is recommended to be updated and commit the project to this initiative by replacing the gas fired boiler proposal.

6.5 Water resources

High star rated fixtures and fittings are outlined as a design repose to SEARs. However, the reporting around water fixtures and fittings is inconsistent across the submitted documentation.

Greater consistency is required across water reporting. It is recommended that the project commit to fixtures and fittings outlined in the ESD report. These are as follows:

- Showers 4 Star WELS
- Bathroom Taps 6 Star WELS
- Kitchen Taps 6 Star WELS
- WC's 4 Star WELS
- Urinals 5 Star WELS

6.6 Electric vehicle charging

Green star benchmarking has proposed the installation of EV parking. The installation of EV parking proposed within Green Star benchmarking should be reflected in the architectural plans and project documentation.

6.7 Materials

Green star benchmarking has proposed a Life Cycle Assessment for the project. This is to be completed and reflected in project reporting or revised benchmarking completed to capture project commitments more accurately.

6.8 Climate adaptation

Green star benchmarking has proposed a Climate Adaptation Plan for the project. This is to be completed and reflected in project reporting or revised benchmarking completed to capture project commitments more accurately.

6.9 Building management system

Green star benchmarking has proposed a Building Management System (BMS) be utilised within the project. This is to be completed and reflected in project reporting or revised benchmarking completed to capture project commitments more accurately.

A BMS has not been outlined within the BASIX certificate. The certificate should be updated to outline more accurately where a BMS will be employed.

7. Landscaping

The City raises the following matters for your consideration in relation to landscaping of the site:

7.1 Deep soil

The basement plan nominates all areas outside of the basement at the south-east corner of the site as deep soil. However, this area cannot be nominated as deep soil given that at ground floor, structure covers majority of the site with communal rooms, substation, boosters etc. This leaves only a small, raised planter surrounding pavements and seating, that is partially over deep soil.

It is required that the basement plan be amended to show the portion of deep soil unencumbered by the ground floor slabs above.

7.2 Landscaping in communal open spaces

The EIS states that the area of communal open space provided is 1,458.5sqm, however parts of the ground floor are covered by floors above. Upon review it appears that 1,100.8sqm of communal open space is provided, which should be reflected in the documentation.

Further information is required to demonstrate that acceptable levels of amenity and solar access is provided to the communal open space areas:

- Amended plans coordinated with levels (SSL, RL, TW0).
- Sections drawn to scale to match the architectural plans through each communal open space.
- A typical detail for raised planters and trees.
- A plan that confirms the soil volume per tree that complies with the Landscape Code.
- Solar access analysis which demonstrates how the communal open spaces receive the required levels of solar access at midwinter.

Further discussion regarding each area of communal space is provided below.

7.2.1 *Ground floor:*

The principal communal open space is provided at ground level within a courtyard area that is over a basement slab and includes raised planter beds, tree planting, paved pedestrian pathways, and a water feature for Connection to Country. Queries and further information required for this communal open space is as follows:

- The landscape plans indicate stepped planters with trees, however there are no details and sections to demonstrate the provision of adequate soil depth and soil volume to support the healthy growth of the trees to maturity.
- What is the water feature design and depth? How can the design prevent the potential for any children climbing in?
- There is a lack of detail on the architectural and landscape plans to assess the suitability of the communal seating, water features and surface finishes.
- This area is heavily shaded by the proposed development, receiving solar access to only a portion of the north-eastern corner at midday midwinter. This does not comply with the 2 hour minimum requirement for solar access to communal open spaces.

7.2.2 *Level 5:*

The communal open space on Level 5 is located at the north-western corner and includes seating and planter beds to perimeters with a 1m high glass balustrade on the terrace edge and no shade structures. More detail is required for levels, soil depth and volume, to assess if the design can support tree growth. It is also located in close proximity to the entry doors to Units types D and E4. Questions are raised regarding visual and acoustic privacy for these units.

7.2.3 Level 6:

Level 6 includes a common seating terrace to the western edge and an indigenous rooftop farm to the northeast. There are no shade structures, and like the communal open spaces at ground level and Level 5, further detail is required to demonstrate the design and feasibility of the planting.

7.3 Facade Greening

The plans show facade greening and planting on structure at Levels 1-6, and possibly green walls to the Eveleigh, Cleveland and Woodburn Street facades on Levels 1-4, at approximately 12.5m high and located adjacent to operable windows. These greening features are not detailed in the landscape documentation.

Elsewhere, there is facade greening within climbers on each floor interfacing the internal courtyards and street facades, with no detail on these planters, soil depth and ongoing maintenance strategies. Additionally, there are planters on Level 5 in the north-east and south-east corners with seating, with a lack of detail provided to demonstrate that residents cannot step up onto the seating and potentially fall.

It is noted that there have been changes made to the Fire Regulations to resolve flammability of green walls near operable windows. The installation of extensive green walls to facade must demonstrate that the design provides a minimum 900mm clearance between green walls and operable windows.

The City generally supports green roofs and walls, subject to feasibility and safety. Currently, there is a lack of detail provided to demonstrate if the proposed green roofs and walls are viable and sustainable. As such, for the City to support the greening design, the following is required:

- More detail for the façade greening design and the proximity to operable windows on each level.
- A NSW Fire Review on the proposed greening, and changes to the design where required to remove any fire risks.
- More information to clarify the vertical green design, if a proprietary green wall system or wire with planters is required, and outline drainage, irrigation and how the green will be accessed for ongoing maintenance as well as who will be responsible for ongoing maintenance.

8. Car, motorcycle and bicycle parking

The proposal includes the provision of 19 car parking spaces, 25 motorcycle spaces and 116 bicycles spaces. The following is noted in relation to these parking provisions:

8.1 Car parking

The development should seek to minimise car parking provision given the highly accessible location, the proposed land use and the constraints of the site. The City's parking controls details the maximum allowable on-site parking rates not required parking rates. Parking proposed should be in keeping with the objectives and provisions of the Sydney DCP 2012 and with the highly accessible location. It is recommended that the proposed car parking be minimised.

8.2 Motorcycle parking

The proposed number of motorcycle car parking spaces exceeds the maximum amount permitted under the Sydney DCP 2012, being 1 per 12 car parking spaces. The proposed number should be reduced to demonstrate compliance.

8.3 Bicycle parking

The EIS outlines that the proposed co-living development provides for rental accommodation to students, key workers and locals seeking more affordable housing opportunities. As such, the proposed development should be categorised as residential accommodation, rather than hotel or backpackers' accommodation for the purposes of determining appropriate bicycle parking.

Residential bicycle parking should be provided at the Sydney DCP 2012 rates of 1 per dwelling. Given that there are 216 units, 216 Class 1 spaces (individual bike lockers) would be required, not the 116 Class 2 (secure room) spaces.

Staff parking for employees of the retail tenancies should be provided as Class 2 facilities at the Sydney DCP 2012 rate of 1 per 250msqm GFA. This would equate to 4 spaces for the current proposal.

End of trip facilities must also be provided for staff in accordance with Sydney DCP 2012 guidance. This equates to 4 personal lockers and 1 shower and change cubicle.

Both residential and retail components of the development must provide visitor parking, which is to be in an accessible on-grade location near a major public entrance to the development and is to be signposted.

9. Servicing, waste and access

The City raises the following matters for your consideration in relation to the servicing and waste arrangements for the proposed development:

9.1 Loading

The loading spaces provided are not adequate, with the development proposing a single SRV space which does not comply with the servicing spaces required for the site, and for a standard SRV which would not fit into the basement due to inadequate overhead clearance.

As such, the design of the development should be amended to accommodate sufficient vertical clearance for a standard SRV, as well as a total of 6 loading spaces. In accordance with the requirements of the Sydney DCP 2012, at least 3 loading spaces for the residential component of the development and an additional 3 loading spaces are required for the retail.

9.2 Waste arrangements

Co-living is a type of residential accommodation that should be treated as residential accommodation for waste management planning purposes. As such, the building is to be assessed as residential development and waste is to be collected by Council waste collection.

To accommodate Council vehicles, on-site waste collection and loading is to be in accordance with the requirements of the Sydney DCP 2012 and City of Sydney's Guidelines for Waste Management in New Developments in 2018. This requires that the

proposed development is designed for waste collection and storage to be accommodated wholly within the site.

The City prefers for waste collection to occur in the building's basement, followed by being at grade within the building in a dedicated collection or loading bay. As the current clearance to the basement currently does not allow for a Council collection vehicle, an area on the ground floor level would need to be allocated to provide for a waste holding area where bins are able to be collected at street level.

It is noted that if the overhead clearance for the basement is increased as per the servicing requirements, waste collection should occur in the basement.

Additional waste arrangement issues are to be addressed to ensure future serviceability of the site for waste collection:

- The documentation advises that residential waste is to be collected twice a week. However, the new development should accommodate a once a week frequency.
- The newly designed waste storage area should be adequately sized to accommodate enough waste bins for a weekly collection as per the number of bins provided for in the City's waste calculator and include additional space for manoeuvrability.
- The plans do not include chute rooms and the proposed chutes are not designed in accordance with the City's DCP and Guidelines requirements. Chutes are located adjacent to habitable rooms which is not acceptable. A chute maintenance schedule is to be provided. It is noted that the use of an eDiverter chute would not be supported given their high failure rate.
- Waste calculations for the commercial waste component are to be reviewed and increased. Waste calculations should be based on mixed use and include waste generation rates for retail tenancy as a minimum, with additional allowance for waste storage for a future food premises. The current calculations appear to be for only commercial offices.

Should you wish to speak with a Council officer about the above, please contact Mia Music, Senior Planner, on 9265 9333 or at mmusic@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport