

Proposed Mixed Use Boarding House Development

175 – 177 Cleveland Street and 1 – 5
Woodburn Street, Redfern

Scoping Report and Request for Secretary Environmental Assessment Requirements
(SEARs)

On behalf of

EG

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* This document is for discussion purposes only unless signed and dated by the Project Director.

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1 Introduction

This report has been prepared by Mecone on behalf of EG (Proponent) in relation to the site located at 175 – 177 Cleveland Street and 1 – 5 Woodburn Street, Redfern.

This report requests the Secretary prepare Environmental Assessment Requirements (SEARs) to guide the preparation of an Environmental Impact Statement (EIS) for a State Significant Development (SSD) application.

Under Schedule 2 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), development within the Redfern Waterloo area with a capital investment value (CIV) of more than \$10 million is identified as SSD pursuant to section 4.36(2) of the *Environmental Planning and Assessment Act 1979* (EPAA). As the proposed development will have a CIV in excess of \$10 million, the proposal is classified as SSD.

To support the request for the SEARs, the following information is provided:

- An overview of the site and context;
- A description of the proposal;
- An overview of the statutory and strategic context; and
- An overview of the likely environmental and planning issues.

This letter should be read in conjunction with the Preliminary Architectural Plans are provided at **Appendix 1**.

2 Relevant Background

The site has a long development history and has been the subject of two (2) SSDAs. The proposal is seeking a built form outcome commensurate with the most recent SSDA approval, thereby ensuring no additional nor adverse visual or environmental impacts. Further discussion is provided below.

2.1 SSD 6371 – Mixed Use Student Housing and Residential SSDA

On 28 January 2015, the Department approved SSD 6371 for 175-177 Cleveland Street being a student accommodation and residential flat building. The development reached a height of five (5) storeys and provided an FSR of 2.98:1. It accommodated 40 rooms, 13 apartments and a single storey basement.

The approved development is shown in the figure below.



Figure 1 Photomontage of the Proposed Viewed from Gardeners Road
Source: Ghazi Al Ali – SSDA 6371

2.2 SSD 7064 – Hotel, Residential and Retail SSDA

Following this approval, the property owner, Krikor Simonian, acquired the adjoining site at 1 – 5 Woodburn Street. An SSD Application (SSDA) (SSD 7064) was submitted to the Department of Planning Industry and Environment (DPIE) in September 2015 for a part 5 and part 6 storey mixed use development containing ground level retail and hotel accommodation with capacity for 72 rooms, and a residential flat building containing 19 apartments.

The SSDA was recommended for approval by the DPIE on 6 December 2016. However, the Planning and Assessment Commission refused the SSDA on 20 February 2017. Broadly, the reasons for refusal were due to the following:

- The architectural expression was considered to be incompatible with the existing streetscape in terms of scale, size and materiality;
- The accompanying SEPP 1 objection seeking to vary the height and FSR development standards was considered not to be well founded and did not adequately demonstrate that compliance with the development standards was unreasonable or unnecessary;
- The proposed mix of uses was considered to be incompatible with the zone; and
- It was considered that the residential units would not receive adequate amenity.

The SSDA and an accompanying SEPP 1 Objection were subsequently approved by the Land and Environment Court (LEC) on 22 March 2018.

The LEC approval granted consent to the following:

- A six (6) storey mixed use building with an FSR of 3.25:1 and a residential FSR of 1.2:1;
- 45 hotel rooms;
- 20 residential dwellings;
- 2 retail units; and
- 2 levels of basement car parking.

A photomontage of the approved development is shown in the figure below.



Figure 2 Photomontage of the Development Proposed Under SSDA 7064
 Source: JPR Architects

Subsequently, a modification application (SSD 7064 MOD 1) was approved for the site on 21 December 2018. The modification sought consent for the following:

- A mixed-use hotel, residential flat building and retail development comprising:
 - A six (6) storey envelope;
 - Hotel accommodation for 45 rooms;
 - A residential flat building containing 20 apartments;
- Infill central courtyard increasing GFA by 280m² to 3,725m², resulting in an FSR of 3.51:1.
- Internal layout changes to the retail/commercial tenancies;
- Provision of a hotel reception area; and
- Additional residential communal open space.

The proposal has been prepared having regard to this approval. It proposes a building of commensurate bulk and scale, generally within the approved building envelope.

3 Site Description

The site is located at 175 – 177 Cleveland Street and 1 – 5 Woodburn Street, Redfern and is positioned within the City of Sydney Local Government Area (LGA). It is located approximately 400m to the south west of Redfern Railway Station, 800 to the south west of Central Station and 900m of the Sydney Waterloo Metro Station.

The site is situated on the southern side of Cleveland Street and has an area of 1,062m². It has a northern primary frontage to Cleveland Street of 30m, an eastern frontage of 30m to Woodburn Street, a western frontage of 22m to Eveleigh Street and splayed corners.

The location of the site and surrounding context is illustrated in the figure below.

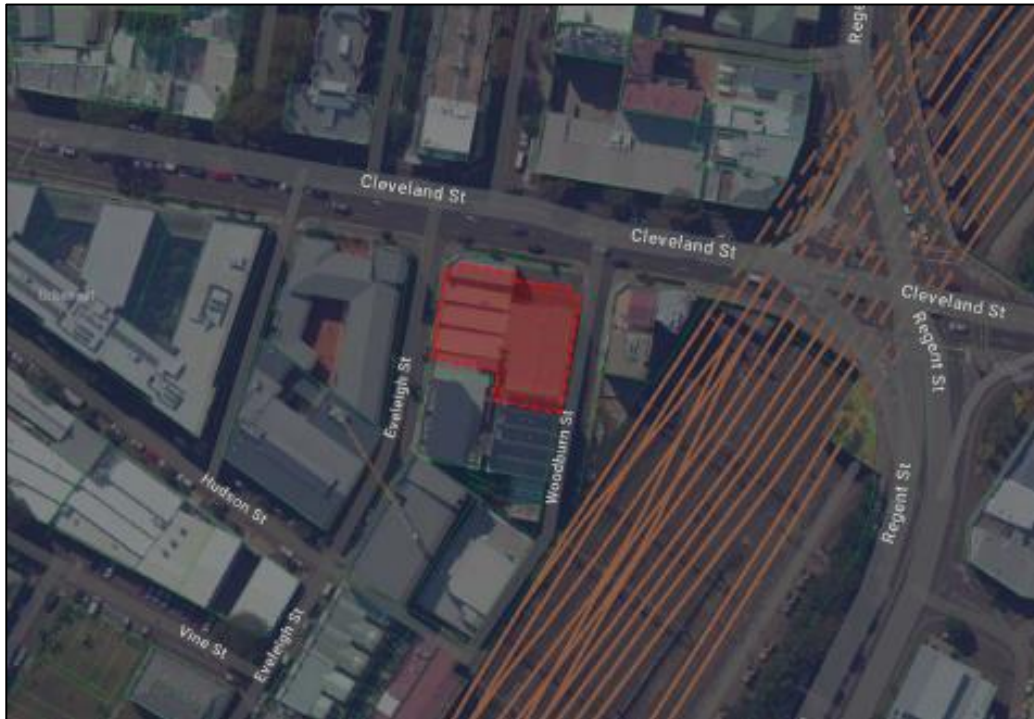


Figure 3 Site Context Map
Source: Mecone / Mosaic

The north western portion of the site contains a part one (1) and part two (2) storey industrial building that occupies the full width of the Eveleigh Street frontage. The north eastern portion of the site fronting Cleveland Street contains an open car park that is adjoined by a two (2) storey brick warehouse that extends southward along Woodburn Street. The existing building stock is outdated and in need of replacement.

The site's legal description is set out in the table below.

Table 1 – Site Legal Description

Site Address	Lot	DP
1 – 5 Woodburn Street	5	2151685
	4/2	977379
	3/2	977379
177 Cleveland Street	10	809537
175 Cleveland Street	1	1093304
	1	724328
	15	57107

4 Surrounding Development

The surrounding area has a transitional character typified by a mix of contemporary medium scale residential flat building and industrial warehouses repurposed for commercial / retail uses.

The surrounding development in the immediate vicinity can be described as follows:

- **North:** To the immediate north, the site is bounded by Cleveland Street. Beyond this lies a part 1 and part 2 storey commercial building accommodating a fitness facility.
- **South:** To the south, the site adjoins a residential building that reaches four storeys in height and fronts both Woodburn and Eveleigh streets. Fine-grained terrace houses are situated further southward along Woodburn Street. To the south west along Eveleigh Street, the development relates to a four (4) storey residential flat building.

Further to the south is the old 'block' site in Redfern which is to be redeveloped as 'The Pemulwuy Project'. The project (SSD 8135) was approved on the 4 March 2019 for a 3-24 storey student accommodation building with 596 student beds.

- **East:** To the immediate east beyond Woodburn Street is a youth hostel that reaches a maximum of five (5) storeys;
- **West:** To the west on the other side of Eveleigh Street is a residential flat building that reaches four (4) storeys fronting Cleveland Street and transitions to three (3) storeys along Eveleigh Street.

A summary description of the site is provided in **Table 2**. The surrounding development is illustrated in the figures below.

Table 2 – Site Description	
Item	Description
Site Addresses	175 – 177 Cleveland Street and 1 – 5 Woodburn Street, Redfern
Total Area	1,062m ²
Frontages	<ul style="list-style-type: none"> • North: 30m to Cleveland Street; • East: 30m to Woodburn Street; and • West: 22m to Eveleigh Street
Existing Uses	The building fronting Woodford Street is used for retail purposes. The warehouse building fronting Eveleigh Street relates to a commercial printing business.
Existing Access	<p>Vehicular access is permitted from Cleveland Street and permits entry to the open hardstand carpark.</p> <p>Pedestrian access via individual entrances from the frontages</p>
Context	The surrounding context is mixed and reflective of a transitional character. It comprises historic warehouse building typologies as well as more contemporary residential buildings and fine-grained terrace houses.



Figure 4 Residential Flat Building to the Immediate East
Source: Google



Figure 5 Development to the Immediate North Looking North East
Source: Google



Figure 6 Urbanest Student Accommodation to the West at 157 Cleveland Street
Source: Google

5 Strategic Context

The Greater Sydney Region Plan sets a 40-year vision (to 2056) for Greater Sydney and establishes a 20-year plan to manage growth and change. The Greater Sydney Region Plan situates the site within the Harbour CBD which is designated as Australia's global gateway and financial capital. The plan is complemented by the Eastern City District Plan (the District Plan) which provides a 20-year vision to manage the growth of the Eastern District to achieve the vision set out by the Greater Sydney Region Plan.

The District Plan situates the site within the Innovation Corridor (refer to **Figure 7**). The Innovation Corridor extends westward along the edge of the Harbour CBD and is envisaged to be supported by education and health institutions, innovation companies and knowledge intensive jobs.

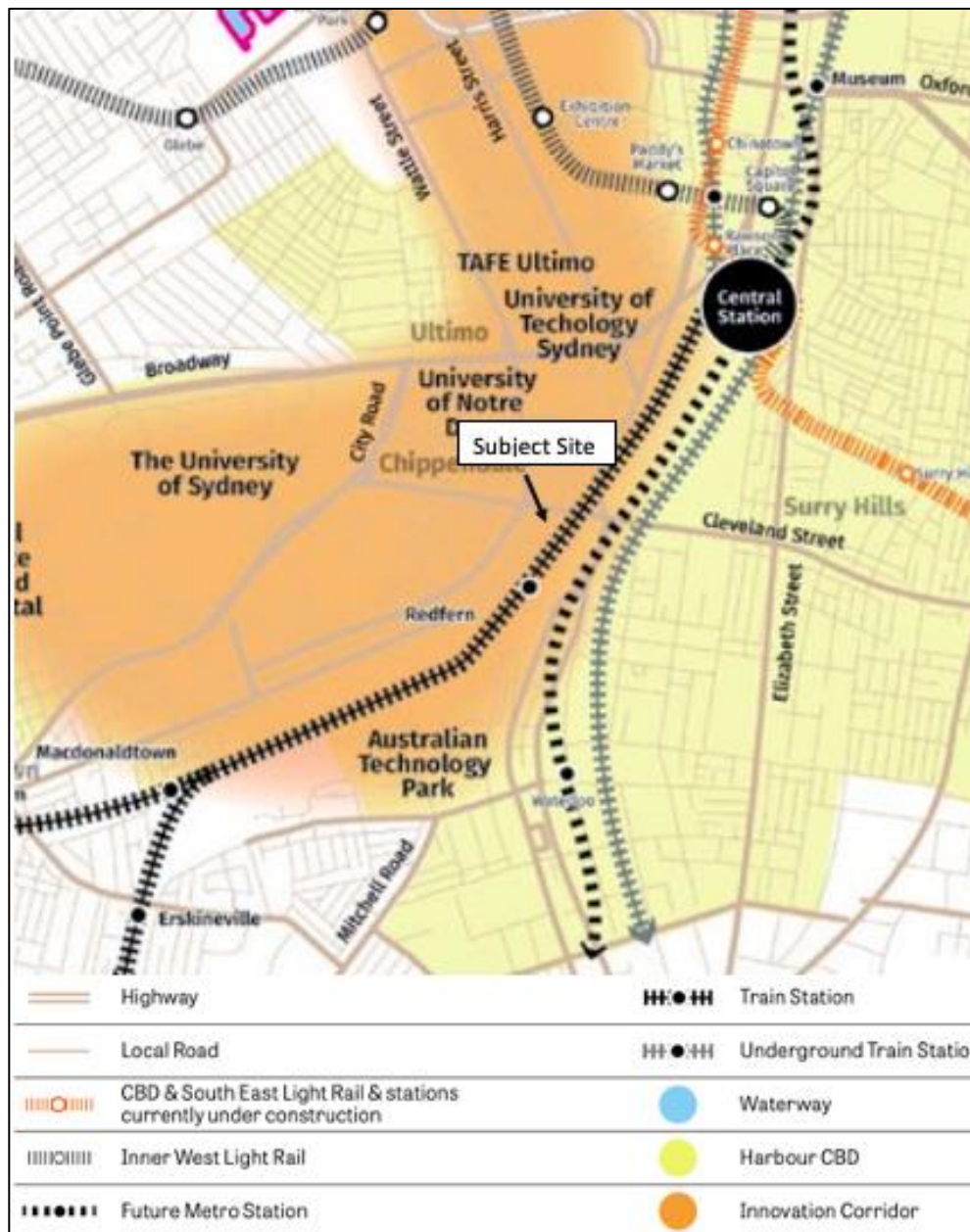


Figure 7 The Site's Location in the Innovation Corridor and Harbour CBD
Source: *Eastern District Plan*

Within the Innovation Corridor, the site forms part of the Camperdown-Ultimo Health and Education precinct and is strategically positioned within the associated Eveleigh Activity Node (refer to **Figure 8**). The *Camperdown-Ultimo Place Strategy* identifies that the collaboration area benefits from major health and educational institutions as well as significant private and public investment in transport infrastructure, particularly around Redfern Station and the future Waterloo Metro Station.

The overarching strategic planning priority for the precinct is to cultivate an internationally competitive health, education, research and innovation area. The achievement of this objective requires urban renewal and the delivery of high-quality public areas and developments. It also necessitates the provision of a diversity of accommodation options, including temporary and permanent accommodation and housing at affordable house points.

The proposal is consistent with the strategic directions of the District Plan and *Camperdown-Ultimo Place Strategy* in that it will rejuvenate the site and replace its outdated building stock with a high quality development outcome, therefore contributing to the urban renewal of the area. It will also contribute to diversifying the locality's housing options.



Figure 8 Camperdown-Ultimo Collaboration Area

Source: *Camperdown-Ultimo Place Strategy*

In addition, the site lies to the direct west of the Central to Eveleigh Corridor (the Corridor). The *Central to Eveleigh Urban Transformation Strategy* identifies that the North Eveleigh Precinct within this corridor and directly adjacent to the site is envisaged to support up to 200 jobs and 700 new dwellings - including affordable housing options. The Corridor also contains Central Precinct SSP which is positioned further northward of the site (refer to **Figure 9**). Central Precinct SPP will support the emergence of the broader Sydney Innovation and Technology Precinct and will support up to 25,000 new innovation jobs as well as unprecedented density. Whilst not within the Corridor, the proposal complements and aligns with its strategic directions as it will assist in increasing the supply of diverse and affordable housing options.



Figure 9 Central Precinct SSP and Innovation and Technology Precinct
 Source: *Central Precinct Draft Strategic Vision (TfNSW)*

The City Plan 2036 – Local Strategic Planning Statement (LSPS) establishes a 20-year land use vision that links the District Plan, Greater Sydney Region Plan and local strategies with Council's planning controls. The LSPS nominates a range of strategic actions. At a high level, these aim to densify and target jobs growth in Central Sydney. Residential accommodation is to be delivered in suitable locations to ensure it does not undermine the economic growth of Central Sydney.

Under the LSPS, the site is positioned outside of Central Sydney within the City Fringe. The City Fringe is identified as suitable for supporting residential accommodation provided it does not compromise the growth of diverse business clusters in the area and the ability to meet the target of 53,800 jobs by 2036. The proposal is consistent with the overarching aims of the LSPS in that it will provide retail floorspace that will enhance jobs growth. The provision of boarding house accommodation, which has

historically been approved for the site, therefore will not compromise the site's ability to support the productivity priorities of the LSPS.

The proposed boarding house use aligns with the liveability actions of the LSPS. The relevant actions identify that there is a need to continue to facilitate housing development utilising the capacity under current planning controls to meet the target of 50,000 additional private dwellings. Future housing is to respect local character, promote affordability as well as diversity. The proposal is consistent with these aspirations in that it responds to the character of the streetscape and will increase the diversity of housing options in the locality.

6 The Proposal

This SSDA seeks approval for the development of a privately-operated boarding house. Specifically, the proposal involves:

- Construction of a six (6) storey mixed use boarding house, comprising:
 - Approximately 3,720m² of GFA (FSR of 3.5:1) comprising 150m² of retail and 3,567m² of boarding house GFA;
 - Approximately 115-125 boarding rooms;
 - Ground floor retail uses fronting Cleveland and Eveleigh streets;
 - Communal areas and resident facilities including an open to the sky internal courtyard;
- Associated landscape works; and
- Extension and augmentation of services and infrastructure as required.

The proposal is illustrated in the Architectural Plans at **Appendix 1** and the figures below.

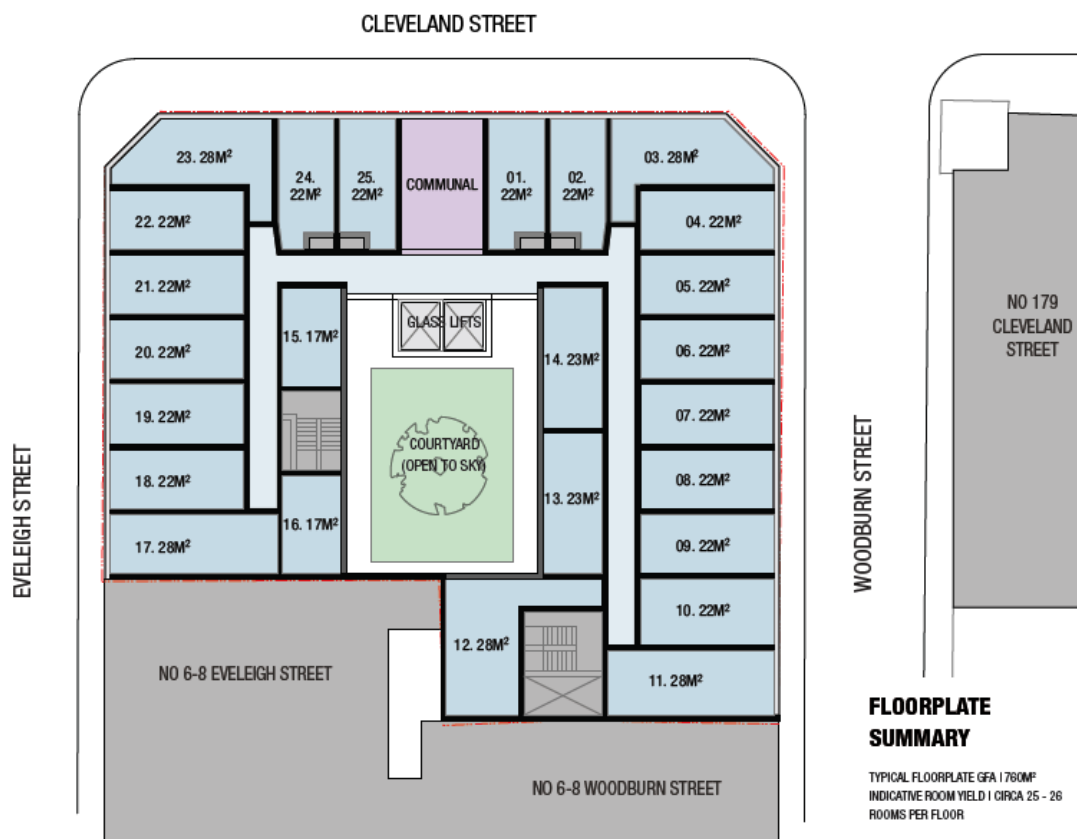


Figure 10 Proposed Typical Floor Plan
 Source: Urban Possible

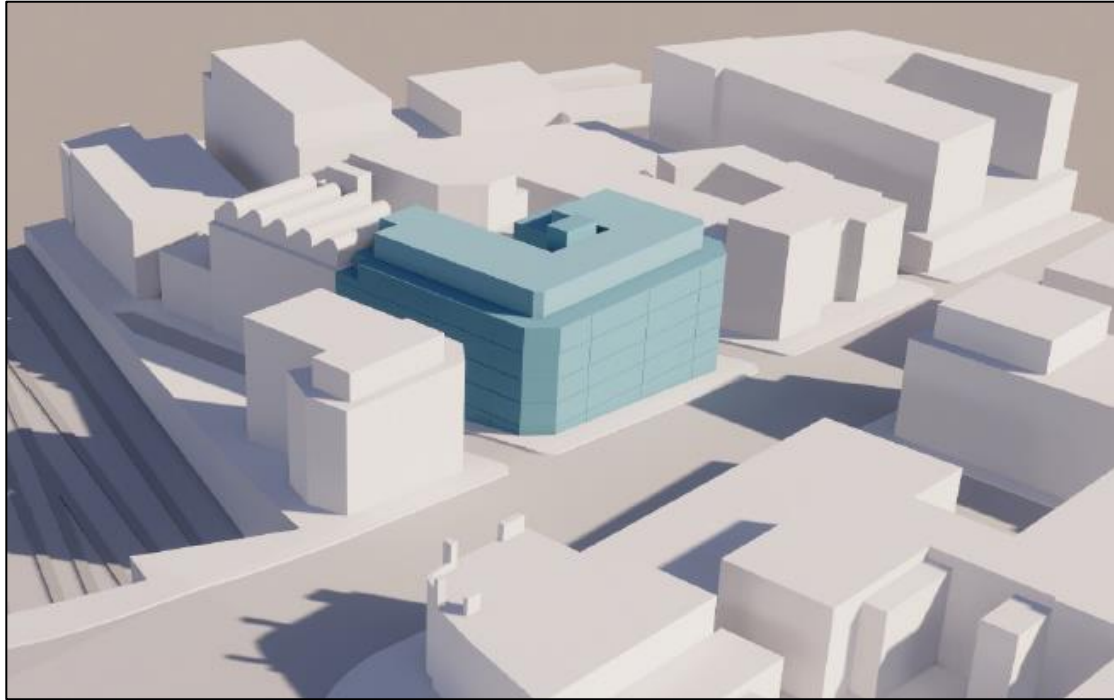


Figure 11 Proposed Massing Viewed Along Cleveland Street Looking South West
Source: *Urban Possible*

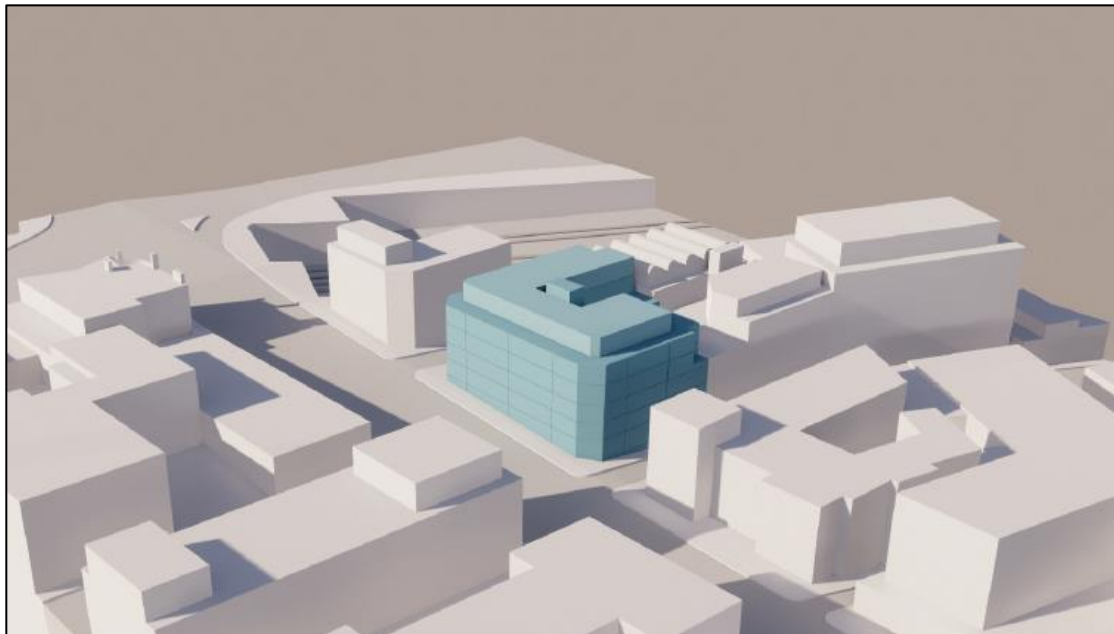


Figure 12 Proposed Massing Viewed Along Cleveland Street Looking South East
Source: *Urban Possible*

The proposal has been designed to sit generally within the built form envelope approved under SSD 7064 MOD 1. The approval permits a maximum FSR of 3,725m² (FSR 3.51:1) for the site and reaches six (6) storeys. The proposal has a slightly reduced GFA of 3,717m² (FSR 3.5:1) and will be consistent with the approved maximum height of 6 storeys.

The proposal will be consistent with the bulk and scale of the approved development with some refinement to the internal configuration (given the alternate intended use)

resulting in more efficient floor plates. As noted in the accompanying architectural statement in Appendix 1, an opportunity also exists to further improve the architectural resolution, articulation and contextual appropriateness of the building. Therefore, the proposal should not give rise to any additional visual or environmental impacts.

It is noted this scheme is preliminary for the purposes of the SEARs request and has not been finalised to date. It is anticipated that the design of the scheme will evolve when we preparing the documentation for the future SSD and there may be some further refinements to the scheme.

7 Planning Framework

The relevant state and local planning instruments apply to the proposal:

- *Environmental Planning and Assessment Act 1979*;
- *State Environmental Planning Policy (State and Regional Development) 2011*;
- *State Environmental Planning Policy (State Significant Precincts) 2005*;
- *State Environmental Planning Policy (Affordable Rental Housing) 2006*;
- *State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)*;
- *State Environmental Planning Policy (Infrastructure) 2007*;
- *Sydney Development Control Plan 2012 (SDCP 2012)*; and
- *Draft Urban Design Principles – Redfern Centre*.

7.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for SSD. Under Section 4.5 of the EP&A Act, the Minister for Planning or the Independent Planning Commission is the consent authority for SSD. Section 4.39 requires that a development application for SSD be accompanied by an EIS in the form prescribed by the regulations.

7.2 SEPP (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (the SRD SEPP) identifies development that is of SSD. The SRD situates the site within the *Redfern-Waterloo Sites* area. Schedule 2 of the SRDI SEPP confirms that development within the *Redfern-Waterloo Sites* area with a CIV of more than \$10 million is SSD.

7.3 SEPP (Affordable Rental Housing) 2006

As the proposal relates to a boarding house, the provisions of Part 2, Division 3 of the *State Environmental Planning Policy (Affordable Rental Housing) 2009* (the ARH SEPP) apply to the site. The site's positioning within the Zone D - Business Zone – Mixed Use applied under the State Significant Precincts SEPP is an equivalent zone to the B4 Mixed Use zoning in the Standard Instrument LEP pursuant to Clause 5(1)(b) of the ARH SEPP because equivalent land use zonings are permitted.

The ARH SEPP applies a range of development standards to the site. Clause 29(1)(c)(i) specifies that a consent authority must not refuse consent to a development for the purpose of a boarding house if the development is on land within which residential flat buildings are permitted and where the maximum FSR does not exceed the maximum permitted prescribed by the *State Environmental Planning Policy (State Significant Precincts) 2005* (SSP SEPP) plus an additional 0.5:1 where the existing FSR is less than 2.5:1 or less. This Clause reads as follows:

29(1) A consent authority must not refuse consent to development to which this Division applies on the grounds of density or scale if the density and scale of the buildings when expressed as a floor space ratio are not more than—

(c) if the **development is on land within a zone in which residential flat buildings** are permitted and the land does not contain a heritage item that is identified in an environmental planning instrument or an interim heritage order or on the State Heritage Register—the existing maximum floor space ratio for any form of residential accommodation permitted on the land, plus—

(i) **0.5:1, if the existing maximum floor space ratio is 2.5:1 or less, or**

(ii) 20% of the existing maximum floor space ratio, if the existing maximum floor space ratio is greater than 2.5:1.

The site is zoned 'Business Zone – Mixed Use' and residential flat buildings are a permissible use in the zone. The SSP SEPP allows for a maximum FSR of 1:1 for the residential component and therefore the site is eligible for an additional 0.5:1 FSR. Therefore, a total FSR of 1.5:1 for the residential component could be achieved with the FSR bonus.

As such, a maximum FSR of 3.5:1 (3:1 base FSR under the SSP SEPP + 0.5:1 bonus under the ARH SEPP) applies to the subject site. In light of this, the proposal with an FSR of 3.5:1 complies with the maximum FSR development standard prescribed by the ARH SEPP.

Clause 30(1) nominates mandatory development standards that a consent authority must be satisfied to grant development consent. The proposal is capable of achieving compliance with the development standards. The EIS will provide a detailed assessment against each development standard.

7.4 SEPP (State Significant Precincts) 2005

Under *State Environmental Planning Policy (State Significant Precincts) 2005* (SPP SEPP) the site is located within the Redfern-Waterloo Authority Sites. The specific development standards applying to the site and the broader area are set out under Part 3 of Appendix 4 of the SSP SEPP.

7.4.1 Permissibility

The site is zoned D - Business Zone – Mixed Use. The proposal relates to a boarding house which is permitted with consent in the zone. The proposed use is consistent with the zone's objectives which require that future development support a mix of employment and residential opportunities; encourage employment generating activities; maximise public transport; and exhibit design excellence to contribute positively to the amenity of the area. The EIS will include a detailed discussion of the proposal's consistency with the objectives of the zone.

7.4.2 Building Height

The SSP SEPP applies a maximum Building Height (Storeys) development standard of five (5) storeys to the site.

The proposal reaches a maximum of six (6) storeys (excluding roof plant) and therefore contravenes the development standard. The variation is attributed to the FSR bonus of 0.5:1 permitted by the ARH SEPP and it is noted that the previous approval (SSD 7064) allowed for 6 storeys. Notwithstanding the variation, the envelope continues to be suitably scaled and commensurate with the development approved under SSD 7064. The variation to the height control (Clause 21 – Height, floor space ratio and gross floor area restrictions under Appendix 4 – The Redfern-Waterloo Authority Sites of the SSP SEPP) will be supported by a SEPP 1 Objection and will address the Wehbe test, refer to section 7.4.4 below for further discussion.

7.4.3 Floor Space Ratio

The SSP SEPP applies a maximum FSR development standard of 3:1 to the site and also a maximum 1:1 FSR for the residential component.

The proposal will seek consent for a mixed use retail and boarding house development. Boarding houses are defined as a type of residential accommodation by the Standard LEP instrument.

The proposal has an FSR of 3.5:1, with the boarding house component providing an FSR of 3.35:1. The calculation of FSR is outlined as follows:

- SEPP1 Objection to 1:1 to 2.85:1 for boarding house;
- 0.5:1 bonus (under Clause 29.1 of the ARH SEPP) to the FSR control 1:1 for boarding house; and
- 0.15:1 for commercial uses.
- TOTAL FSR 3.5:1

Given the boarding house component will exceed the maximum residential FSR of 1:1 (under Clause 21 – Height, floor space ratio and gross floor area restrictions under Appendix 4 – The Redfern-Waterloo Authority Sites of the SSP SEPP), a SEPP 1 Objection will accompany the EIS. The SEPP 1 Objection will address the Wehbe test, refer to section 7.4.4 below for further discussion. It is noted that the proposal will not exceed the overall maximum permissible FSR of 3.5:1 (3:1 base FSR under SSP SEPP + 0.5:1 bonus under the ARH SEPP).

It is important to note that SSDAs for the subject site and a nearby site have been approved by the State Government that contravene the residential FSR requirement (1:1) prescribed by the SSP SEPP and therefore establish a precedent for affordable residential accommodation. Specifically:

1. The student housing development at 157 – 163 Cleveland Street operated by Urbanest was approved under SSD 4949 with an FSR of 3:1 consisting entirely of residential accommodation for student housing;
2. The Department supported a variation for the subject site (SSD 6371) which allowed for a 100% residential FSR of 2.98:1 (including 1.71:1 for student accommodation and 1.27:1 for the residential flat building).
3. An SSD and subsequent modification (SSD 7064) was approved for the subject site which also allowed an exceedance of the maximum residential 1:1 requirement (circa 1.2:1) having an overall FSR of 3.51:1 (exceeding the maximum FSR of 3:1) for a mixed use hotel, residential and retail development.

7.4.4 Exceptions to Development Standards

The SSP SEPP permits variation to development standards in the instance the proposal is able to satisfy the requirements set out under Clause 16A of Part 3.

Subclause 16A(2) identifies that the variation provisions do not apply to development standards that are expressly excluded from the operation of the clause. The maximum height and FSR development standards are not excluded from the clause. As such, the development standards may be varied in accordance with Clause 16A(2).

As the proposal exceeds the maximum building height (storeys) and residential FSR development standards, the EIS will be accompanied by SEPP 1 Objections prepared in accordance with the relevant requirements nominated by Clause 16A of the SSP SEPP.

The EIS is to be supported by two SEPP 1 Objections (one for the number of storeys and the other for the variation to the maximum 1:1 residential FSR provision). The SEPP 1 Objections would address the principles arising from *Hooker Corporation Pty Limited v Hornsby Shire Council (NSWLEC, 2 June 1986, unreported)* by using the questions established in *Winten Property Group Limited v North Sydney Council (2001) NSW LEC 46 (6 April 2001)* and as reiterated in *Wehbe v Pittwater Council (2007) NSW LEC 827*, as follows:

1. Is the planning control in question a development standard?
2. What is the underlying purpose of the standard?
3. Is compliance with the development standard consistent with the aims of the Policy, and in particular, does the development standard tend to hinder the attainment of the objects specified in Section 1.3 (a)-(c) (previously Section 5(a)(i) and (ii)) of the EP&A Act? Which mainly relates to the '*orderly and economic use and development of land*'.
4. Is strict compliance with the standard '*unreasonable or unnecessary*' in the circumstances of the case?
5. Is the objection well founded?

Also the SEPP 1 Objection would need to consider are there '*sufficient environmental planning grounds*' to justify the contravention and will the proposed development be in the '*public interest*' because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out.

The proposal will be generally consistent with the approved building envelope (SSD 7064 MOD 1) with no additional environmental or amenity impacts. Given the proposal will be of a similar bulk and scale to the approved development, it is anticipated that the proposal will be consistent with the principles within the Wehbe Test as outlined above.

7.4.5 Heritage

The site is not identified as a heritage item nor is it located in the vicinity of surrounding heritage items.

7.4.6 Design Excellence

Clause 22 specifies that consent must not be granted to a new building unless the consent authority has considered whether the proposed development exhibits design excellence. In considering whether a development exhibits design excellence, the consent authority must have regard to the matters set out in Clause 22(2).

The proposal satisfies the design excellence matters for consideration. Specifically:

- It exhibits a high standard of architectural design;

- Incorporates high quality materials and detailing appropriate to its use as a boarding house;
- Will contribute positively to the visual amenity of the public domain; and
- Is capable of incorporating best practice sustainability principles.

The EIS will give further consideration to the design excellence matters for consideration.

Clause 22(3) requires that the proposal be the outcome of a design excellence competition if it exceeds 12 storeys. The proposal does not exceed 12 storeys and accordingly there is no requirement for a design excellence competition.

7.5 State Environmental Planning Policy (Infrastructure) 2007

The subject site is located adjacent to a Classified Road (Cleveland Street). It is within 40m of Redfern Rail Station and the future CBD Rail Link (Zone B – Tunnel) (refer to **Figure 13**).

The EIS will consider the provisions of the *State Environmental Planning Policy (Infrastructure) 2007*.

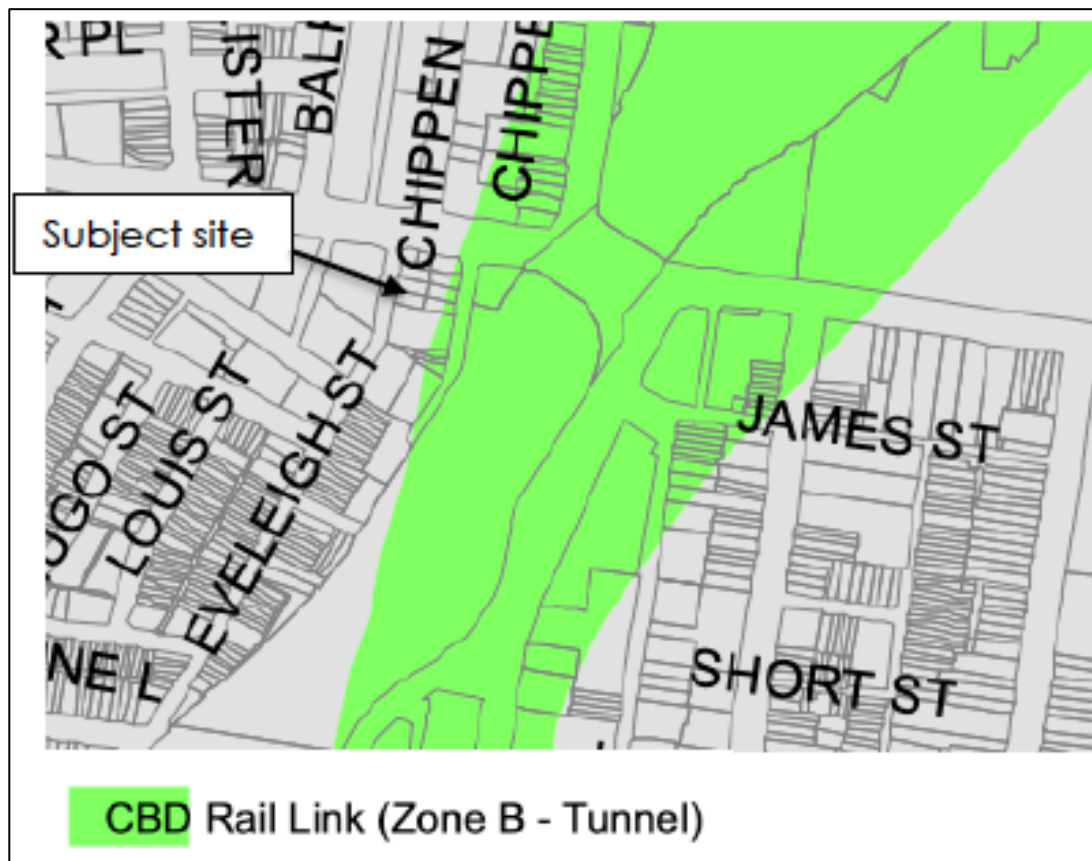


Figure 13 Interim Rail Corridor – CBD Rail Link and CBD Metro
 Source: SEPP (Infrastructure) 2007

7.6 State Environmental Planning Policy No. 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) aims to promote the remediation of contaminated land. Appropriate site investigation documentation will be provided to support the SSDA and to confirm the suitability of the site for redevelopment.

7.7 Sydney LEP 2012

Clause 3 of the Redfern-Waterloo Planning Provisions under the State Significant Precincts SEPP specify that environmental planning instruments (EPIs), other than State EPIs, do not apply to the Redfern-Waterloo Authority Sites. Accordingly, the provisions of the Sydney LEP 2012 do not apply to the site.

7.8 Sydney DCP 2012

Pursuant to Clause 11 of the SRD SEPP, Development Control Plans also do not apply to State Significant development. Nonetheless, the proposal will have regard to the relevant controls of Sydney Control Plan 2012.

7.9 Redfern Waterloo Built Environment Plan (Stage One) August 2006

The *Redfern Waterloo Built Environment Plan (Stage one) August 2006* (The Plan) applies to the site. The Plan situates the site within the Eveleigh Street Strategic Site Area. The EIS will give consideration to the general urban design principles of the Plan, and its aims and objectives.

7.10 Other Planning Policies

In addition to the above, the following policies and legislation apply to the site and will need to be considered as part of the SSD application:

- NSW State Priorities;
- The Greater Sydney Region Plan – *A Metropolis of Three Cities*;
- Eastern City District Plan;
- The City Plan 2036 – Local Strategic Planning Statement;
- Future Transport Strategy 2056;
- Guide to Traffic Generating Developments (RMS);
- Better Placed – An Integrated Design Policy for the Built Environment in NSW;
- Sustainable Sydney 2030;
- Development Near Rail Corridors and Busy Roads;
- Redfern-Waterloo Built Environment Plan (Stage One) August 2006;
- Redfern-Waterloo Development Contributions Plan 2006;
- Redfern-Waterloo Affordable Housing Contributions Plan 2006; and
- Sydney's Cycling Futures; and

- Sydney's Walking Futures.

The EIS will provide a comprehensive assessment against all the relevant strategic plans and statutory provisions.

8 Overview of Likely Environmental Planning Issues

Based on our preliminary environmental assessment, the following environmental assessment issues will likely need to be considered as part of the future SSD:

- Urban Design, Built Form and Streetscape;
- Overshadowing;
- View Loss;
- Public Domain and Landscaping;
- Traffic, Transport and Parking;
- Economic Impacts;
- Waste Management;
- Safety and Security
- Acoustic Impacts;
- Plan of Management;
- Services and Infrastructure;
- Social impacts; and
- Accessibility, fire safety and BCA compliance.

A description of some of the key issues that will need to be addressed is provided below.

8.1 Urban Design, Built Form and Streetscape

The EIS will address the height, density, bulk and scale of the proposed development within the context of the locality. The assessment will demonstrate how the proposal integrates with the surrounding context and that the form, layout and siting of the building achieves optimal design and amenity outcomes.

The EIS will also address how the proposal activates the ground level of Cleveland Street.

8.2 Overshadowing

The EIS will include shadow diagrams that identify the extent of the shadow cast by the proposal. As noted above, the envelope sits within the envelope approved for the site and accordingly the overshadowing impacts are anticipated to be commensurate with or better than those associated with the approval.

8.3 View Loss

The proposal is consistent with the height, bulk and scale approved under SSD 7064. Accordingly, the private view loss impacts associated with the proposal will not be greater than those already approved. A view impact analysis will be included in the EIS to demonstrate this.

8.4 Public Domain and Landscaping

A Landscape Plan will be submitted with the application and will identify the various public domain and landscape treatments proposed for the site.

8.5 Waste Management

A Waste Management Plan will be prepared to accompany the EIS. The Plan will address the proposal's operational and construction waste arrangements with respect to the relevant guidelines and controls. In particular, the Waste Management Plan will identify the waste collection points, waste removal measures and the various waste streams associated with the proposal's different uses as well as the associated waste storage requirements.

The Waste Management Plan will be accompanied by a swept path analysis to demonstrate that the required waste collection vehicle will adequately be able to access the site.

8.6 Safety and Security

A Crime Prevention Through Environmental Design (CPTED) Report will accompany the application addressing the principles of CPTED and issues of crime prevention and safety.

8.7 Traffic, Transport and Parking

A Traffic and Parking Impact Assessment will form part of the EIS and will address issues relating to impacts on the existing road network and parking, arrangement of on-site parking, potential delays and peak traffic movements generated by the proposed school sites, as well as details of any linkages to existing and planned public transport. In addition, an assessment of pedestrian networks and overall accessibility will be included.

8.8 Economic Impacts

An Economic Impact Assessment will accompany the SSDA to address the economic implications of the proposal, including the proposed variation to the maximum residential FSR prescribed by the SSP SEPP.

The assessment will address the *Redfern Waterloo Built Environment Plan (Stage 1) 2006* (the Plan). The Plan provides support for the height and FSR development standards that apply to the Redfern and Waterloo Area. It identifies that the development standards were imposed for the purpose of encouraging the employment growth and establishes a jobs target of 18,000.

Importantly it will consider current and future demand for affordable residential accommodation in the Redfern area, including modern boarding house (co-living) opportunities.

The Economic Impact Assessment will address the appropriateness of the proposed use from an economic perspective and also its implications for jobs growth in the area.

8.9 Acoustic Impacts

An acoustic assessment will form part of the EIS and address the impact of road and rail noise upon the development, in addition to any potential impacts on nearby properties such as adjacent tenancies and any other sensitive noise receivers. The assessment will provide suitable measures to help mitigate against any potential acoustic impacts.

8.10 Plan of Management

An Operational Plan of Management (POM) will be prepared in support of the EIS. The POM will address the site's operational requirements, including but not limited to, its maximum occupancy, on-site management procedures, security and the use of community areas, complaints handling.

8.11 Services and Infrastructure

The proposal will be accompanied by an assessment of current utilities and infrastructure, their capacity to service the development and potential need for their augmentation.

8.12 Social Impacts

An assessment of the proposed sites in relation to potential social impacts will accompany the future SSDA.

8.13 Accessibility, Fire Safety and BCA

A building assessment of the proposal will also be conducted and submitted with the EIS to ensure and demonstrate compliance with related accessibility, fire safety and BCA standards.

9 Consultation

9.1 Stakeholder Consultation

The Proponent has sought to consult with relevant planning authorities since the project's inception. The Proponent met with senior planning staff from the City of Sydney Council and the Department of Planning Industry and Environment (DPIE) on the 26 August 2020 to discuss the proposal.

9.2 Community Consultation

No community consultation has been undertaken to date. However, during preparation of the EIS, we anticipate consultation will be undertaken with the following stakeholders:

- Department of Planning, Industry and Environment;
- City of Sydney Council;
- Roads and Maritime Services (RMS); and
- Transport NSW.

10 Conclusion

The purpose of this document is to request the SEARs for the preparation of an EIS for the establishment of a boarding house at 175 – 177 Cleveland Street and 1 – 5 Woodburn Street.

It includes a description of the site, an overview of the proposed development and an outline of what are considered to be the likely environmental issues for assessment of the SSD application.

It is noted that Council raised a number of design issues during the assessment of the previous SSD (SSD 7064). The future SSD creates an opportunity to address Council's design issues which will ensure that an optimal urban design outcome is achieved for the site.

We trust that the information detailed in this document is sufficient to enable to Secretary to issue the SEARs. Should you have any queries about this matter, please do not hesitate to contact me on 02 8667 8668 or behendriks@mecone.com.au.