



WEE HUR STUDENT VILLAGE 13-23 GIBBONS STREET REDFERN

RESPONSE TO SUBMISSION - SUPPLEMENTARY DESIGN REPORT

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EXECUTIVE SUMMARY

DESIGN PROPOSAL

The revised design responds to comments from authorities and stakeholders received during the submissions process.

We have worked with GMU, the authors of the Redfern Urban Design Principles, to undertake a peer review of the design. Through a series of workshops, we identified and addressed a number of issues:

BULK AND SCALE

The proposed floor space ratio has been reduced to 7.7:1 from 8.4:1 in the DA submission

The podium and overall building height has been reduced to relate more closely to the podium and building heights of 11 Gibbons and 1 Margaret Street

The mezzanine floor has been deleted to reduce the scale of the podium and the common spaces reallocated within the building.

The development represents an appropriate density considering the strategic planning context of this area, the existing and pipeline developments around Redfern Station and along Regent Street. The form responds to the corner block condition by addressing all three open frontages and forms a bookend to the Central to Eveleigh Corridor area, which extends to Margaret Street.

Detailed analysis has been undertaken to compare the proposed scheme with a complying scheme in terms of shadows, solar access and visual impact. Refer to Chapter 1 of this supplementary design report.

Shadows have been reduced from the DA scheme and are less than those that would be cast by a complying scheme and, some times of day, less than those cast by the existing building. Refer to Chapter 1 this report (Supplementary Design Report).

Solar access to the neighbouring residential flat building at 1 Margaret Street and to the nearby Gibbons Street Reserve and National Centre of Indigenous Excellence (NCIE) playing fields has been improved from the DA scheme and studied

to compare the effect of the existing building, proposed design and a complying design. Refer to Chapter 1 of the supplementary design report for further detail.

Building setbacks have generally been increased compared to those of the Development Application. Refer to Chapter 2 of this report (Supplementary Design Report).

BUILDING SEPARATION

A precinct wide study extending from Lawson Square down past Margaret Street has been undertaken to assess the proposal’s consistency with the existing and emerging character of the area in terms of the streetscape character, podium alignment and height, tower setbacks and building separation.

The southern face of the podium now aligns with the Margaret Street frontage to create a coherent street wall and relationship across the street.

The street level facade has been considered with articulated openings and awnings to create a richly detailed pedestrian experience.

TOWER DESIGN

The tower form has been further articulated by the continuation of the setback on level 4 around to the eastern facade, creating a ‘shadowline’ detail between tower and podium

The eastern facade of the tower has been developed with more articulation so that the tower is seen ‘in the round’ with three main elevations since the neighbouring site at 116 Regent Street (BP service station site) is unlikely to be developed for the foreseeable future.

PRIVACY

The amenity of neighbours both existing and future has been further considered with the realignment and treatment of windows facing across the northern, eastern and southern

boundaries.

LANEWAY ACTIVATION AND DESIGN

The amount of activation to the lane has been increased by reducing the amount of service areas facing the lane. This has been achieved by reducing the number of substations from two to one and relocating services to basement or where possible.

This has allowed more active uses to be located facing the lane, including student common spaces and a prominent bike hub and bike workshop, which will be used to promote cycling and active transport, educate the community and residents about bike maintenance and safety.

The floor level of common rooms facing the lane has been lowered by 350mm to bring it closer to the level of the lane at Margaret Street to improve connections, both visual and physical, to the laneway. A difference of at least 500mm in level between internal floor level and the laneway flood levels must be maintained to address flooding and overland flow across the laneway.

Refer to Chapter 4 of the supplementary design report

Public domain and landscape design has developed to improve pedestrian safety and connectivity between indoor spaces and the laneway by moving the vehicular trafficable area alongside the eastern boundary, away from the building. This has created outdoor spaces on the laneway immediately adjacent to the building, allowing them to be monitored by and used with the indoor areas as an extension to the common space, for example during larger events.

The outdoor spaces will have tree planting to address wind effects and downdrafts from the building. An increased setback to Margaret Street has allowed space for tree planting to help address wind effects on this frontage. Tree planting on the Gibbons Street verge will help address wind effects on this frontage. Light spill and undesirable views of the petrol station next door will be mitigated by 1.8m high green screen along the eastern boundary.

Refer to the landscape design report for further detail on public domain



EXECUTIVE SUMMARY



View from Gibbons Reserve looking North - 3D visualisation by Virtual Ideas

BUILDING ENTRIES ARTICULATION

The legibility and accessibility of building entries has been improved by creating wider entryways, sheltered by distinctive awnings and set back from the street to allow better integration of accessible ramps for ease of access and equitable treatment of all building users. Each entry is fronted by active uses such as common spaces or offices to improve surveillance and safety.

PODIUM ARTICULATION

The podium on Gibbons Street is designed to continue the local tradition of street wall buildings and has been scaled to match the existing residential flat building at 1 Margaret Street and the DA approved affordable housing building at 11 Gibbons Street. Openings in the podium wall follow the historical pattern of large window openings at ground level for shops and commercial spaces with smaller, vertically proportioned openings in the levels above.

The massing and detailing of the podium follows the tradition of smaller buildings being built together in rows, unified by a strong and distinct parapet language for each row, reading as distinct sub-blocks within the larger street block. The podium is split into smaller sub-blocks by the recessed entry and common balconies on the levels above. Each block has a distinctive parapet treatment using expressive brickwork, cornice lines and variable parapet heights reflecting the heterogeneous nature of the traditional streetscapes in the local area.

The podium articulation to Margaret Street and the laneway is lower in height and is simpler, reflecting the traditional difference in decoration between primary and secondary facades and uses a simple, vertically proportioned, paired window pattern that reflects the arrangement of the rooms within the podium and responds to the fenestration pattern evident in the side elevation of St Luke's church across Margaret Street.

Windows on the ground floor are set back from the street alignment to provide a degree of privacy from the street and express the thickness and solidity of the street wall. Splayed

reveals and window heads are used to add articulation and emphasis to key openings to ground floor spaces.

Refer to Chapter 3 of the supplementary design report for further detail regarding the design evolution of the podium and tower.

INTERNAL AMENITY

Bedrooms have been increased in net area (excluding ensuite and kitchenette) to 11.5m² from 11m² in the DA submission. Typical studios now include a queen-sized bed rather than the king single sized bed in the DA.

Common areas are located close to main circulation areas and to benefit from views out to the laneway, Gibbons or Margaret Streets. All common areas, other than the gym room, have access natural light through generously sized windows. Space provisions for common areas are proposed at a rate of close to 2m² per bed which is well in excess of the SEPP requirements.

Fresh air is supplied to bedrooms either through openable windows in every bedroom or, when traffic noise is an issue, each room will be provided with mechanical ventilation. Fresh air intake for mechanical ventilation is through roof mounted fans, which is then circulated via ductwork risers directly to each bedroom.

Common spaces on Ground level will be provided with outside air ducted from the façade. Common corridors in the tower will be naturally ventilated via openable louvres on the façade located at the end of each corridor.

Refer to Chapters 3 and 4 of the supplementary design report for further information regarding sun shading, bedroom design, communal area design and ESD strategies.

ABORIGINAL CULTURE AND HERITAGE

We have collaborated with a local artist to incorporate aboriginal cultural narratives and imagery into the design. The proposed public artwork is prominently located and is intended to be a destination in the area and part of the local public art trail.

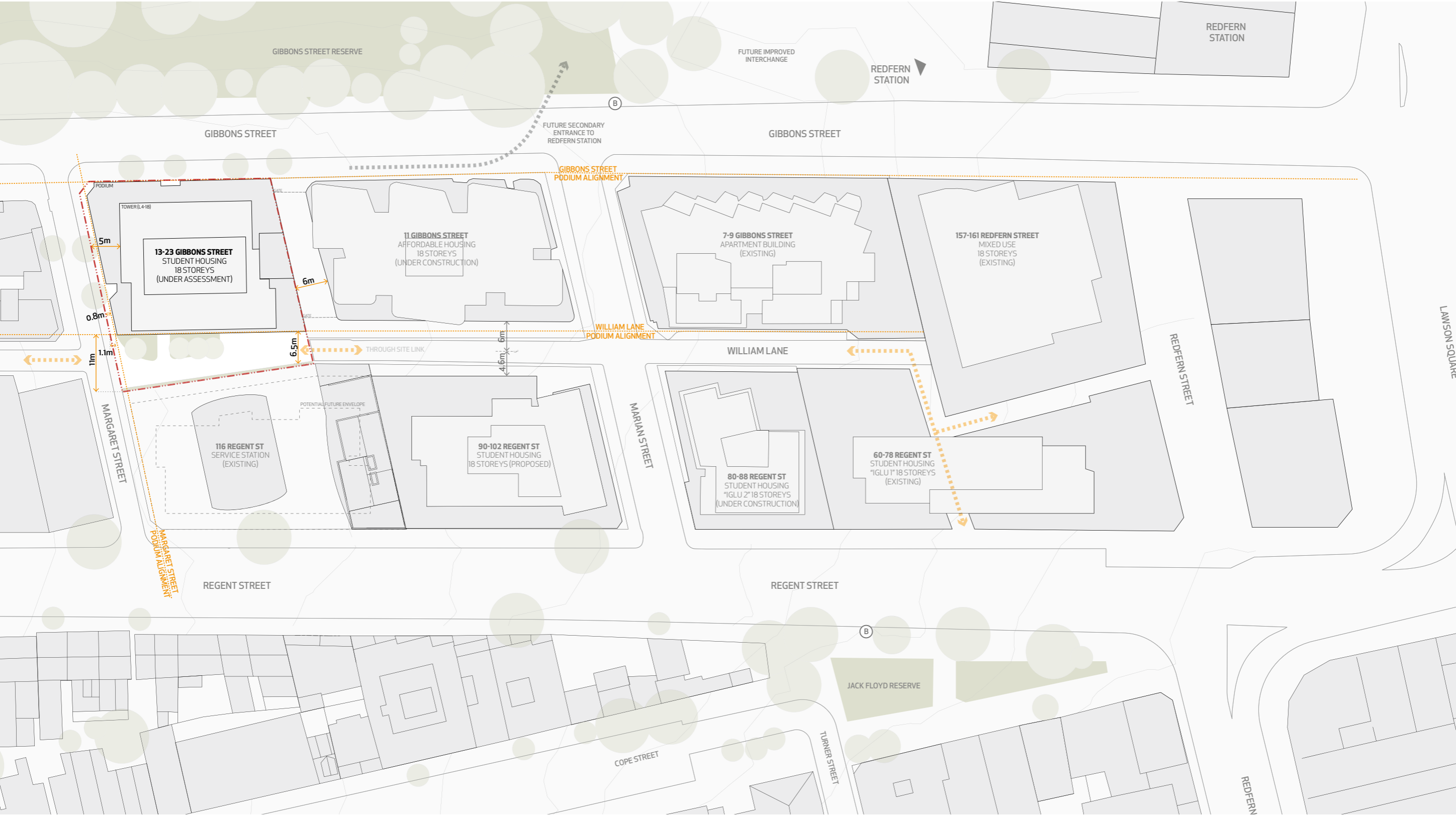
EXECUTIVE SUMMARY

SITE + CONTEXT PLAN

PODIUM

A precinct wide study has been undertaken in association with GMU, extending from Lawson Square down past Margaret Street, to assess the proposal's consistency with the existing and emerging character of the area in terms of the streetscape, podium alignment and height, tower setbacks and building separation.

Podia generally extend across the full width of each site and align to the street boundary with the exception of the loading area for 11 Gibbons Street, which has created an uncharacteristic break in the street wall.



TOWER

A precinct wide study of tower forms shows that the proposed tower has a relatively narrow frontage to the west, so will read as a reasonably slender form when compared to the neighbouring buildings, which have been more heavily articulated in order to address their relatively bulkier forms. The articulated southern side of the tower form is consistent

with the neighbouring buildings which have articulated ends leading to a more slender appearance when seen from the north or south. It is apparent that side setbacks are typically reduced from the 9m+9m RUDG control and are typically at least 10.5m.



SCHEDULE

DA - RESPONSE TO SUBMISSIONS SUMMARY

Item	Notes	Chapter
SDRP Comments from meeting of 16/03/20		
Demonstration of Design Excellence	A request to bring 13-23 Gibbons Street (SSD-9194) to the SDRP for a third review session was made on 06/01/20 and declined by GANSW on 14/01/20. Following SDRP2 GANSW recommended that the project not return until an FSR compliant model could be presented. The proposal remains FSR non-compliant. Additionally, it was almost 18 months since the project had last been seen by the Panel (3/10/18) and the assessment process was well underway.	
	GANSW's last advisory letter as informed by the SDRP states that the scheme as proposed (with increased floor area over allowable) is not leading to a design excellent outcome. Notwithstanding some improvements since this time, this position has not changed. We note the following: + the site is highly constrained + achieving a design excellent outcome in these conditions is therefore highly challenging + any proposal which seeks additional FSR beyond allowable must work even harder to achieve a design excellent outcome.	
	While a number of secondary issues have been addressed (as detailed below), on balance it remains the position of GANSW that the current proposal does not demonstrate design excellence. Design excellence may be possible with a compliant scheme, however, as this has not been provided to the SDRP for review, this has not been demonstrated.	
	Further, as required by the SEARs, no proposal has been put forward for post-approval engagement with the SDRP to ensure design integrity.	
William Lane laneway accessibility and use	Support the reduction in the extent of service/back of house frontage to the lane.	
	Support the amended landscape design which is now more pedestrian friendly through the introduction of larger trees and seating.	
	The frontage of the bike repair/storage room has been increased, however the balcony off the communal kitchen has been removed. Detailed design of the façade in this location is critical to ensure operability and permeability from in/out.	Chapter 4, p56
	The ground plane should be an extension of the public domain. If stairs are unavoidable, exploration of a more nuanced stair design with seating opportunities is recommended.	Chapter 4, p59
	The only public use in the laneway is the bike repair/storage room. While retail may not be viable, enterprise opportunities should be explored as a way to activate the laneway.	Chapter 4, p58
	Further articulation of the façade fronting the laneway is required. The use of awnings and recesses should be balanced with any CPTED requirements. 3D studies of this area should be provided to better understand it's spatial qualities.	Chapter 4, p58
Entry locations and articulation	Support the wider entrance on Gibbons Street and the amended podium height which now reflects the height of neighbouring podiums.	
Noise mitigation through façade treatment and articulation	A concept engineering solution is required to understand the balance of mechanical and natural ventilation and how it will be managed to respond to noise impacts.	Chapter 3, p65
Plant/services location and retail provision at grade	Support the reduction in services fronting William Lane.	
	Support relocation of the bin room to the ground floor from the basement.	
	While retail may not be viable, enterprise opportunities or other broader community uses should be explored as a way to activate the laneway and improve its overall amenity.	Chapter 4, p55
Room dimensions and cross ventilation	Support 3.25m/3.3m ceiling heights to common areas and dorm rooms on levels 2/3, and 2.8m ceiling heights on typical floors which will assist in offsetting the small size of these spaces in plan.	
	Given studio rooms which comprise the majority of rooms on offer (363 of 419) remain below the DCP requirement, the provision of common space for student amenity is critical. While this is provided on other floors, the concern is that there is a lack of common space of any size on residential floors. Calculations must be provided which show the m² of common space per student and demonstrate that this exceeds minimum requirements.	Chapter 4, p59
	While it is stated that 'internal planning does not preclude cross ventilation', a concept engineering solution is required to understand the balance of mechanical and natural ventilation and how it will be managed to respond to noise impacts.	Chapter 3, p46t
Incorporation or inclusion of Aboriginal culture and heritage into the design proposal	Support the ongoing collaboration with a local Indigenous artist to develop the public artwork in the laneway.	
	Implementing the artwork and other recommendations made in the 'Integration of Aboriginal cultural heritage values into development design' report provided as part of the EIS, should be included in the conditions of consent should the proposal be approved.	

Department of Planning RFI – 20/12/19		
1. Setbacks	Review the proposed tower setbacks and potential privacy impacts given the eastern elevation includes habitable room windows less than 9 m from the boundary.	Chapter 2, p29
2. Podium height	Provide an assessment and contextual analysis of the increased podium height in Gibbons Street, noting the Redfern Centre Urban Design Principles require podium heights to respond to the parapets/RLs of existing buildings to create symmetry/consistency across streets and laneways.	Chapter 3, p39
3. Solar access to 1 Margaret St	Provide additional solar access analysis that calculates the hours of sunlight received by apartments at 1 Margaret Street between 9am and 3pm in midwinter (consistent with the calculation of solar access for residential amenity in the Apartment Design Guide).	Chapter 1
4. Wind	The Wind Report recommends a 3m high pergola be provided to mitigate wind impacts to the north-western corner of the level 4 terrace. If proposed, the pergola must be included on the proposed plans and relevant issues considered. If not proposed, please provide a revised Wind Report that recommends alternative wind mitigation measures for this location and include these measures on the proposed plans.	Chapter 3, p49
5. Common amenities	Further consider the provision of amenities, including toilets, on level 4 given the size of communal space and facilities on this level.	Chapter 4
6. Signage	Review the size and location of the proposed projecting wall sign, noting it does not comply with Council's Signage and Advertising Structure Development Control Plan 2005.	Chapter 3, p50
7. Accessible rooms	Confirm it is intended a minimum of 17 student rooms will satisfy accessibility requirements under AS1428.1.	Refer EIS - Access Consultant
8. Mezzanine floor plan	Revise the mezzanine floor plan to confirm voids are located above the games room and retail tenancy.	DA2001
9. Site plan	Provide a revised detailed site plan.	DA1001
City of Sydney 20/12/19		
1. SEPP 1 Objection – Height and Floor Space	The City maintains the view that the provisions and floor space bonuses of SEPP ARH are not applicable for the development. As previously stated in our correspondence dated 12 March 2019, the site is located in the Business Zone - Commercial Core which is not a land use that is listed under Clause 26 of State Environmental Planning Policy (Affordable Rental Housing) 2009.	
	Further, the amended scheme presents a further breach to the principal development standards. Whilst SEPP SSP does not define the term 'mezzanine', The Standard Instrument defines 'mezzanine' as "an intermediate floor within a room". The proposed mezzanine is not an intermediate floor within the games and common room on the ground floor but rather a storey that provides additional rooms concealed within the double-height volume of the ground floor. As such, the proposal presents a 19 storey development and is inconsistent with the 18 storey height control. A SEPP 1 Objection has not been submitted to justify the contravention.	Chapter 4, p63
2. Urban Design		
2.1 Built Form and Height	It is reiterated that significant consideration should be made on achieving an appropriate transition between the built form of the approved 18 storey development to the north (11 Gibbons Street) and the existing 5 storey development to the south at Margaret Street. This can be alleviated through improving the building expression of the development, as detailed below	Chapter 3, p39
	Having regard to the mezzanine level mentioned above, the proposal presents a technical street frontage height of 4 storeys and is inconsistent with the Section 4.2 – Design Principles: High Rise Development Portions of the Redfern Centre Urban Design Guidelines (RCUDG). The proposed height of 14.85m for the podium is approximately double that anticipated by the RCUDG, which prescribes a "strong base of 2-3 storey or 6.5-7.5m that responds to the human scale". The RCUDG assumes that the podiums are built to the boundaries and only setback	Chapter 3, p39
	The RCUDG assumes that the podiums are built to the boundaries and only setback to Gibbons and Marion Streets and William Lane to provide footpath widening. However, the proposed podium does not extend to the Margaret Street boundary. There is a minimum 870mm setback to contribute more space to the footpath, but not a footpath widening, with a varying setback to Margaret Street. This approach of not building parallel to Margaret Street fails to reinforce the street alignment and the tower, in part, almost comes to ground. This is in conflict with the desire create a human scale.	
	To improve the relationship of the proposed built form, the podium should be designed to be a maximum 3 storeys and match the height of the approved podium of 11 Gibbons Street.	Chapter 3, p39
2.2 Setbacks	The inability for the Proposal to deliver upper level setbacks in accordance with RCUDG is related to the insufficient site size. The minimum site area for high rise development within the Redfern-Waterloo Authority (RWA) lands is 1400m². At a site area of 385m², only 15m² under the threshold, the site area is less than the prescribed site area and is more challenging.	
	The Proposal complies with the street upper level setbacks of 4m to Gibbons and Margaret Street but is unable to provide the building separation of 18m between non-habitable rooms for buildings in excess of 8 storeys in the RCUDG. The Guidelines also indicate that each development site is to provide a minimum of 50% of the required separation distance as measured from the boundary.	Chapter 2, p27
	The required tower setback from the northern boundary is 9m. The proposed ranges from 4m to 6m and does not comply. Cumulatively, between 11 Gibbons Street and the subject site, the separation is approximately 12m. The majority of the proposed northern elevation is blank except for one of the middle rooms aligned with the core. There is little visual privacy created from the insufficient side setback.	Chapter 2, p27

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	There is a minor non-compliance to the 9m upper level setback from the eastern boundary, however, this results in an insufficient upper level setback to the northern boundary.	Chapter 2, p27
	Generally, the upper level setback is greater or equal to 4m to the southern boundary, however, it is less than that from the podium. This will create greater wind impacts. A minor 2m setback from the street frontage height is provided along Margaret Street. In this manner, the tower almost comes to ground.	Chapters 2 (p31) & Chapter 3 (p45)
	The non-compliances with the setback controls is unacceptable. It is recommended that the podium extends to the Margaret Street boundary, with a 4m upper level setback to the tower. This will reinforce the street wall and provide a transition to the adjoining areas to the south. Having regard to the exceedance in the FSR control, there is no reason why the proposal cannot comply with the tower footprint created by applying the upper level setbacks.	Chapters 2 (p31) & Chapter 3 (p45)
2.3 Building Expression	It is acknowledged that the development has been amended to incorporate an increased suite of materials and finishes as previously recommended in our objection letter. However, the development lacks articulation and the amended scheme presents additional issues of perceived building bulk as a result of the proposed building expression.	Chapter 3, p41
	Having regard to the other matters detailed above, further consideration should be made to improving the articulation of the building. This can be achieved through meaningful changes to certain façade elements to better integrate with neighbouring buildings and surrounding context.	Chapter 3, p41
	The City provides an extract of the east elevation (Gibbons Street) superimposed with the approved elevation of 11 Gibbons Street in Attachment A. To summarise, the building expression of the tower can be improved through the simplification of the horizontal elements into 3 evenly distributed parts.	Chapter 3, p41
	It is recommended that the shadow line between the tower and podium be maintained to break up the mass of the overall building.	Chapter 3, p41
	It is also recommended that the proposed podium be amended to match the podium height of 11 Gibbons Street and ‘step up’ to the corner of Gibbons Street and ‘step down’ along Margaret Street to correlate with the 2 to 3 storey scale to the south of the site. To this effect, the building expressions would be greatly improved and would positively responds to its context.	Chapter 3, p39
	Further, the RTS includes reference to “patterned precast panels”. However, there is no sample of this indicated in the materials board. To understand the proposed expression of the building, it is recommended that an example or physical sample of the precast pattern be provided. Clarification is also sought on whether there is another indicative plan that is missing from the RTS set of architectural drawings that illustrate the different façade treatments for each elevation.	Refer Materials Board
2.4 Signage	The proposed top of building signage creates bulk and visual clutter. It is out of character with the adjacent low scale area to the south, nor are there any projecting wall signs at the top of the building within the Redfern-Waterloo Authority land to the north.	Chapter 3, p50
	A smaller projecting wall sign is proposed above the awning on Gibbons Street. The sign is not supported and would be more in keeping with signage in this area as a wall sign.	Chapter 3, p46
3. Heritage	The site is located within close proximity to ‘St Luke’s Presbyterian Church’, which is identified as a heritage item of local significance. The RTS presents a minor and tokenistic increase to the setback of the proposed development from the church. The City reiterates that the building footprint, notably the south-eastern corner, should be consistent with the footprint of the existing building so as to increase building separation and visual connectivity to the church and therefore, maintain a meaningful separation between the church and proposed development.	Chapter 5
	By incorporating the recommendations detailed in the Building Expression discussion above, the development would have an improved relationship with the heritage item.	Chapter 5, p68
4. Active Frontage	The RCUDG provides principles for ground level activation. These include incorporating active uses to the ground floor and minimising blank walls of all new developments onto public streets, public spaces and pedestrian links and laneways as well as including retail/commercial tenancies and building entries leading directly to the street.	Chapter 2, p68
	The subject site has two street frontages to Gibbons and Margaret Street and a proposed frontage to the through-site link, and as such, presents an appropriate opportunity to activate the site on three frontages. However, the proposed retail tenancy being located on the north-western corner of the ground floor does very little in encouraging an active street frontage.	
	The remainder of the ground floor is occupied by common room spaces of the boarding house, which do not have a relationship with the surrounding streets.	Chapter 4, p56
	Further, the ground floor southern façade is predominately blank resulting from the use of vertical aluminium fins that screen the common rooms.	Chapter 2, p31
	The awning over the entry on Gibbons Street does not offer weather protection due to its height. An awning over the entry is needed to protect pedestrians from downdrafts and rain.	
	There is an awning proposed on the south eastern corner which partially hangs over the footpath and the planted area. This offers no continuous protection to pedestrians.	DA2001

	Consideration should be made for retail uses and the boarding house lobby to be located on the ground level. The common rooms should be relocated to the first storey to therefore eliminate the need for screens for privacy. Shopfronts should be located at street level with individual entries and a continuous awning be implemented to genuinely provide weather protection to pedestrians to both the through site link and Margaret Street.	
5. Through Site Link (TSL)	In principal, TSL is supported. However as proposed, the design and form is unresolved and underdeveloped.	Chapter 4, p58
	The geometry of the eastern part of the site could be reconfigured to physically and visually connect with William Lane across Margaret Street.	Chapter 4, p58
	The location of the stairs to the common rooms could result in pedestrian and vehicular conflict.	Chapter 4, p58
	All seating and pedestrian amenity has been removed in the RTS. Instead, the amended architectural plans prioritise vehicular access, back of house uses, flooding and drainage measures within the TSL.	Refer Landscape Plan
	The public domain in the TSL is designed as a heavy duty paved road for servicing the substations and for lifting and movement of equipment associated with the transformer and building.	Refer Landscape Plan
	The lane is edged by a 800mm wide grated flood drain on the eastern boundary.	
	There are no deep soil areas included for medium to large tree planting.	
	The TSL is an opportunity to introduce landscaping and an active frontage. As proposed, the TSL is not pedestrian orientated with a minimal design and does not address the issues previously raised.	Refer Landscape Plan
6. Wind Impacts	The RTS and Environmental Wind Tunnel Test Report, prepared by SLR, provides wind tunnel test results for the amended development building proposal only. The testing omitted all wind mitigation recommendations such as landscaping, street and podium trees, overhead pergolas and awnings and perimeter windbreaks.	Chapter 3, p58
	The Report relies on the existing mature street trees on Gibbons Street to ameliorate significant wind speeds. However, to facilitate construction, all existing street trees on Gibbons Street are proposed for removal and replanted with new trees.	Refer Arborist Letter
	Further, the Report suggests that the wind conditions along Margaret Street are generally worse for a compliant scheme. This is unexpected as the compliant scheme has a 4m upper level setback from the street frontage height whilst the proposed development presents, in part, a 1.5m setback from the street frontage height to Margaret Street. There is a correlation with setbacks to towers and wind impacts at ground level. Typically, the greater the tower setback from the podium, the more effective the amelioration of the wind at ground level. It is expected that a podium disrupts the down draft and disperses the wind before it impacts the ground level.	Refer wind report
	Having regard to the above, the Report recommendations are not adequately justified and flawed. It is recommended that the Department commission a peer review of the Wind Report and the wind impacts. The revised wind analysis remains insufficient and the considerable wind impacts resulted from the proposal is unacceptable and the City’s initial concerns remain outstanding.	Refer wind report
7. Over shadowing	The RTS and the submitted shadow diagrams reason that the additional overshadowing resulted from the proposed development is acceptable given the extent of impact is relative to the shadows cast by a compliant envelope.	Chapter 1
	Notwithstanding the above and discussed elsewhere in this report, the proposal results in other negative environmental impacts. Therefore, the justification for the additional overshadowing is inadequate and to permit the development and other associated environmental impacts is unacceptable.	Chapter 1
8. Public Art	Whilst the RTS acknowledges that a condition of consent is accepted for a detailed public art plan to be submitted prior to issue of a Construction Certificate, The City encourages that the future public art plan provide substantial detail of the artwork’s relationship with its context and address how wind impacts in the TSL would impact the long term viability of the proposed suspended artwork in this location as well as the safety of pedestrians who traverse underneath. The final detailed public art plan must be in accordance with the City of Sydney Guidelines for Public Art in Private Developments.	DA Condition
9. Trees and Landscaping	The RTS demonstrates little change to the landscape design of the development and remains unsatisfactory. The amended landscape design deletes design elements, rather than resolve key issues. It does not demonstrate landscape design excellence, provide acceptable amenity at ground and podium levels and does not adequately mitigate significant wind impacts, which overall, would affect the success of any proposed landscaping of the development.	Refer Landscape Report
9.1 Tree Removal and Tree Planting	The Arboricultural Impact Assessment Report, prepared by Urban Arbor, has been reviewed and specifies that a total of 19 trees are to be removed. This includes the removal of all 16 trees within the site and 3 street trees on Gibbons Street. The Report has recommended the removal of the 3 street trees due to their poor form from pruning practices by the overhead power lines company. The street tree canopies are biased towards the building and will conflict with the future awning on Gibbons Street.	Refer Landscape Report

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	However, the street trees are Council owned and managed assets. Whilst the trees have been poorly pruned in the past, the trees are young, healthy and semi mature vigorous trees. As such, tree removal of the street trees is not supported. It is noted that 3 replacement trees on Gibbons Street as well as 2 replacement trees on Margaret Street are proposed to be planted. Notwithstanding this, the existing street trees on Gibbons Street must be retained.	Refer Landscape Report
	The TSL will be considerably shaded throughout the day with likely wind tunnelling effects. The 4 hymenosporum falvum (native frangipani) that are proposed to be planted along the TSL are inappropriate tree species for this location and environmental conditions. Tree plantings within the TSL should be large canopy trees that provide amenity and contribute to the local area.	Refer Landscape Report
	Landscaping of the site is minimal and does not achieve the City's 15% canopy coverage requirement under Sydney DCP 2012. Any design elements including awnings, street furniture and footpath upgrades within the public domain must ensure appropriate setbacks are provided from existing trees to allow maturity of the trees to be achieved.	Refer Landscape Report
	Tree removal must be carried out by a qualified arborist (AQF Level 3 Aboriculture) and must be in accordance with AS 4373-2007 – Pruning of Amenity Trees. Tree planting must be in accordance with the City of Sydney Street Tree Master Plan 2012.	DA Condition
9.2 Landscaping on L4 Common Open Space	There are 1.8m high brick and glass walls and barriers to the terrace to ameliorate high wind speeds, however, these screens are not shown on the amended architectural plans.	Refer Landscape Report
	The landscape plans describe the intended level of amenity for the communal open space with BBQ area, communal dinning, seating, viewing and dwelling spaces. However, the wind report test results (sensor locations 26-30) show that no sensor location meets the required 10 m/s criterion dining and sitting criterion.	Refer wind report
	The only areas that achieve the standing /window shopping level of 13m/s criterion are in the south western edge of the terrace nominated for a BBQ structure. Several sensor locations exceed the 13 m/s criterion.	Refer wind report
	The Level 4 proposal is reliant on raised planters with 16 small trees to the north and southern edges of the terrace that sit outside 1.8m high brick/glass walls that will be inaccessible for maintenance. There is no strategy for alternate wind mitigation should the trees fail.	Refer wind report
	Overall, the Level 4 landscaping is unresolved and not viable. The terrace would be predominately covered, enclosed and would not be comfortable in high winds for dwelling, sitting or short periods.	Refer wind report
	The north-western edge of the open terrace exceeds walking criteria and therefore unlikely to be used. The tower creates significant wind impacts for the only common open space within the development proposal. The design should not rely on the use of trees or landscaping for wind mitigation.	Refer wind report
10. Health and Contamination	The City recommended that the submitted Contamination Assessment Detailed Site Investigation (DESI), prepared by Douglas Partners, be peer reviewed by a NSW EPA Accredited Site Auditor and a Section A Site Audit Statement be submitted to certify that the site is suitable for the proposed use.	
	Whilst the RTS outlines that there is no reasonable basis to require the DESI to be peer reviewed, the proposed use is for a form of residential accommodation that is identified as a sensitive land use under Clause 7 of State Environmental Planning Policy No. 55 – Remediation of Land. The Clause mandates that the consent authority must not consent to the carrying out of any development unless it is satisfied that the land is suitable for the proposed development. Accordingly, it is appropriate to require an accredited Site Auditor to peer review the DESI to ascertain that the land is suitable for development so as to satisfy the provisions of the SEPP.	
11. Public Domain	The proposed widening of the footpath on Margaret Street from 1.7m to 2.6m is supported. The difference of 0.9m should remain in private ownership, which could be delineated by a control joint in the concrete paving. Further, the footpath widening could allow for one additional street tree to be provided. As such, it is recommended that additional planting be explored on Margaret Street.	Refer landscape report
	Additionally, the RTS does not alter the previously recommended conditions associated with storm water and flood planning.	Refer landscape report
12. ESD	The amended ESD Report, prepared by SLR, submitted as part of the RTS does not improve or demonstrate the sustainability requirements outlined in the SEARs. The Report conflicts with the BASIX commitments in terms of natural ventilation, shower ratings, solar energy.	Refer ESD Report
	The architectural plans also lack any reference to the BASIX commitments as required by SEPP (Building Sustainability Index: BASIX) 2004. The Report refers to the Green Star and Well Building Standard rating schemes, but neither are proposed for the development.	Refer ESD Report
	Overall, the RTS fails to demonstrate any genuine attempt to deliver a reasonable environmental performance building. A significant commitment or at a minimum, evidence of some environmental performance and sustainability is required.	Refer ESD Report
13. Amenity and Bedroom Size	The RTS states that smaller room sizes are offset by larger communal living spaces. It also states that students have different needs to typical residents in a boarding house, they usually reside for shorter periods of time and typically spend less time alone in their rooms and more time socialising and using common areas.	Chapter 4
	While the communal space is important for socialisation, the bedroom size should facilitate space and room to pursue study, which should be provided within their room, rather than at a local café, as suggested in the RTS.	Chapter 4
	The insufficient amenity provided by the wind affected common areas and confined configuration of bedrooms do not adequately justify a dispensation for the substandard amenity within the bedrooms.	Chapter 4

14. CPTED and Boarding House Operation	The CPTED Report, prepared by Elton Consulting, has been reviewed. The Report states that there will be an on-site duty manager and a night manager. The City recommends that procedures for dealing with emergencies and anti-social behaviour be developed for the boarding house.	Refer to PoM
	A Plan of Management (POM) is referenced in the Report, however is not submitted with the RTS. The submission of this document is imperative to understand the management and operation of the proposed boarding house use, particularly with respect to security, access control and site management.	Refer to PoM
GA NSW 24/01/20		
William Lane laneway accessibility and use	<p>The reduction in the extent of service / back of house frontage to the lane is supported.</p> <p>However, the size and frontage of the bike repair and storage room has been reduced, meaning the areas fronting the laneway are primarily for exclusive use of students.</p> <p>It is also noted, these frontages are raised thus overlooking rather than activating William Lane.</p> <p>(It should also be noted that an 'active façade', as referred to in the RTS, is different from activating the laneway.)</p>	
	<p>The SDRP had previously recommended the following considerations which have not been actioned:</p> <ul style="list-style-type: none">• ground plane design as an extension of public domain• enterprise opportunities for ownership or operation of activities along William Lane to better engage the community.	Chapter 4, p58 Refer landscape report
	<p>The introduction of trees at the Margaret Street entrance is supported.</p> <p>However, the amenity of the laneway generally has been greatly reduced by removal of pedestrian seating and the dominance of hard paving.</p>	Refer landscape report
	<p>Additionally, where awnings and recesses broke up the William Lane façade, these have been removed and the built form now encroaches on the laneway making it appear smaller at the ground plane.</p> <p>3D studies of this area are required to better understand it's spatial qualities.</p>	Chapter 4, p58
Entry locations and articulation	The wider entrance on Gibbons Street is supported. However, further refinement is required to ensure the podium façade and awnings respond to those of neighbouring buildings, which would improve the reading of the building and the delineation of the entrance.	Chapter 3, p39
	The same applies to the entrance off William Lane	
Noise mitigation through façade treatment and articulation	<p>Advice is provided that noise can be adequately mitigated by appropriate specification of glazing, frames and seals and windows being fully closed with use of mechanical ventilation.</p> <p>However, this is likely to impact on proposed ESD features which include 'high levels of natural ventilation to accommodation units'.</p>	Refer Acoustic report
	Further detail is required to understand the balance of mechanical and natural ventilation and how it will be managed to respond to noise impacts	Refer Acoustic report
Plant/services location and retail provision at grade	As noted above, the reduction in services fronting William Lane is supported. However, the lane is now characterised by uses that are primarily for students and these overlook rather than activate the lane.	Chapter 4, p58
	The provision of at-grade retail (or other broader community uses) as recommended by the SDRP would activate the laneway and improve its overall amenity.	Chapter 4, p58
Room dimensions and cross ventilation	Any increase in room sizes is supported, however studio rooms which comprise the majority of rooms on offer (363 of 419), remain below the DCP requirement.	Chapter 4
	While it is stated that 'internal planning does not preclude cross ventilation', further detail is required to understand the balance of mechanical and natural ventilation and how it will be managed to respond to noise impacts, as noted above.	Chapter 4
Incorporation or inclusion of Aboriginal culture and heritage into the design proposal	<p>The collaboration with a local artist to develop the public artwork in the laneway is supported.</p> <p>Further collaboration is required in response to the changes made to the laneway, the artwork's location and it's structure.</p>	Chapter 4, p58
	Implementing the artwork and other recommendations made in the 'Integration of Aboriginal cultural heritage values into development design' report provided as part of the EIS, should be included in the conditions of consent should the proposal be approved.	DA condition
Demonstration of design excellence	<p>Design excellence is both a process and an outcome. While the proponent attended two SDRP sessions (12 September and 3 October 2018), further SDRP sessions were recommended to determine design excellence and advise on quality outcomes for a compliant proposal. This did not occur.</p> <p>The strategy for achieving design excellence is incomplete, and further, as required by the SEARs, no proposal has been put forward for post-approval engagement.</p>	
	Given the scheme remains non-compliant, the activation of William Lane is poor and no additional public benefit is provided, the scheme does not demonstrate a design excellent outcome.	

GMU COMMENTS - RESPONSE TO SUBMISSIONS SUMMARY

GMU Comments from letter of support 29/06/20		
Building Footprint proportions	The length and depth of the proposed tower building footprint is consistent with the proportions of other towers in the block, presenting a tower form frontage of approximately 25m to Gibbons Street and 23m to Margaret Street.	Site & context plan, p.6 & 7
	The tower footprint is smaller than several of the approved towers in the block with more rectangular proportions, resulting in a form that is orientated to both street frontages in response to the site location.	Site & context plan, p.6 & 7
	The bulk and scale of the proposed tower form is considered to be appropriate, complementing the emerging development pattern within the block. The relationship between the proportions of the podium and the tower footprint assist in differentiating the individual building components so the building 'base' reads as a separate component to the tower form when seen in the round.	Chapter 3, p.44-45 Built Form
Podium and Streetwall	The podium building line follows the street alignment of both Gibbons Street and Margaret Street to provide definition and containment to the surrounding streets in accordance with the objectives of the Urban Design Guidelines.	Site & context plan, p.6 & 7
	To the northern site edge, the podium provides a nil setback to the boundary adjoining No. 11 Gibbons Street to the north. In this location, the streetwall scale ranges from one to three storeys providing increased setback for levels 2 and 3 where rooms are orientated north.	Chapter 3, p.44-45 Built Form
	The streetwall scale to Gibbons Street (west) is stepped from a 3 storey scale to the north, aligning with the podium height of the approved development to the north at No. 11 Gibbons Street, to 3.5 storeys the south to align with the parapet of No 1 Margaret Street on the opposite corner. The urban design guidelines seek a 3 storey streetwall scale fronting Gibbons Street and Margaret Street but given the existing streetwall scale of adjoining development, the variation is considered reasonable as it responds to the alignment of adjacent sites and the sloping topography.	Chapter 3, p.44-45 Built Form
	To Margaret Street (south), the 3.5 storey streetwall scale is continued around the corner from Gibbons Street, stepping down from the alignment of the parapet of No. 1 Margaret Street to the south, to 3 storeys further east. The proposed streetwall scale is considered appropriate as it correlates to the 3 storey scale of the development to the south at the corner of Margaret Street and William Street.	Chapter 3, p.44-45 Built Form
	The scale is also consistent with the likely future streetwall at the adjacent site to the east at No 116 Regent Street where the Urban Design Guidelines seeks 3 storeys. The stepped streetwall reduces perceived bulk, transitioning to the lower developments to the south. The stepped profile provides transition to the residential area to the south and is sympathetic to the proportions of the heritage listed church. The podium façade is articulated with a fine grain expression to the pedestrian environment reflecting the traditional lot pattern and shopfront widths found in the area.	Chapter 3, p.44-45 Built Form
	To the eastern interface, the setback provided to the eastern boundary varies from approximately 6m closest to the northern site edge to 11m closer to Margret Street. The generous setback accommodates a pedestrian through-site connection to link Margaret Street to William Lane improving the permeability of the block and the active movement network to and from the new station entry.	Site & context plan, p.6 & 7
	A 3 storey streetwall is provided to the new laneway. The 3 storey scale of the podium facing the laneway aligns with the scale of the approved podium to the north. GMU support this outcome and consider the through-site link to be contributory to the relationships within the block.	Chapter 3, p.44-45 Built Form
Tower Setbacks and Seperation		
	The Urban Design Guidelines require a 4m setback above podium level to Gibbons Street and Margaret Street. To Gibbons Street (west), the proposal provides a secondary setback of 5.1m at Level 04 and the tower form above is setback 4m from the western boundary, creating a 'waist' at level 04 to articulate the tower form as separate from the podium and reinforce the streetwall scale.	Site & context plan, p.6 & 7 Chapter 3, p.44-45 Built Form
	To Margaret Street (south), the secondary setback varies from 3.7m to 7m due to the geometry of the tower footprint and to the angled alignment of the tower form (which is not parallel to Margaret Street). GMU considers this an appropriate response as it accentuates the corner location and improves solar access to development along Margret Street due to the greater setback provided to the western corner.	Site & context plan, p.6 & 7
	The urban design guidelines require minimum 13m separation between buildings up to 8 storeys and minimum 18m separation for towers exceeding 8 storeys in height, requiring a 9m setback to be provided to the northern boundary. To the northern site edge, a varied setback of 4.4m to 6.4m is provided above the 3 storey streetwall. Given that the recent approval at No 11 provides lesser setbacks than sought by the guidelines and informs the emerging rhythm of tower forms established within the block and the block to the north, GMU find the proposed setbacks to be a reasonable outcome, resulting in simplified tower form, balanced streetscape proportions while ensuring minimised amenity impacts to future occupants.	Site & context plan, p.6 & 7 Chapter 3, p.44-45 Built Form

	To the eastern interface, the tower form is set back at Level 04. The setbacks to the eastern boundary (Level 04) ranges from 7.8m (north) to 12.6m (south), continuing the 'waist' treatment of the streetwall from the western elevation and visually expressing the tower form. Similar articulation is provided by the approved development to the north, facing the laneway above podium.	Site & context plan, p.6 & 7
	Above Level 04, the tower provides a varied setback ranging from 6.4m (north) to 11.2m (south) to the eastern boundary. The tower form provides definition to the through-site link, on alignment with the central bay of the tower form at No 11 to the north in the location where the laneway is widened to the south, terminating the line of sight looking south along William Lane. Windows facing east are re-orientated away from the boundary to ensure outlook is focused in a northern and southern direction.	Site & context plan, p.6 & 7
	The design team has, in consultation with GMU, tested in principle layouts for the adjoining site at No 116 Regent Street (east). This work has been undertaken to ensure the proposal will allow a reasonable redevelopment potential for residential uses on the adjacent site. Based on the above, GMU find the outcome to be an appropriate response to the context.	Site & context plan, p.6 & 7
Summary	Therefore, based on the emerging character and key relationships as well as the likely development outcomes surrounding the site GMU believes that the proposal complements the context as follows: <ul style="list-style-type: none">• Improved connectivity through the creation of a through site link;• Improved pedestrian and neighbourhood safety and amenity through further activation and increased passive surveillance to the public and private domain;• A vibrant landscape concept to the new laneway extension, to enhance the urban character of the precinct;• Delivers uses appropriate to the commercial core to complement the vision for the area in proximity to a major transport hub, parks and recreational areas and major educational facilities;• Development which encourages active transport;• A built form which responds contextually appropriate in terms of bulk, scale and built form proportions;• Streetwall scale and articulation to strongly define the street edges;• Streetwall scale which is respectful of the heritage fabric in the area and transitions to adjoining residential uses;• Development which responds appropriately to the corner location;• Development designed to be seen 'in the round';• A built form that contributes to the recognisable skyline of Redfern Centre when seen from other areas of the city as sought by original plans and guidelines for the area.	Site & context plan, p.6 & 7 Chapter 3, p.44-45 Built Form Chapter 4, p.54-57 Chapter 5, p.66 Heritage

