



Request for DGRs – Supporting Document

157-163 Cleveland Street, Redfern

Prepared by:

RPS AUSTRALIA EAST PTY LTD

Level 12
92 Pitt Street
Sydney NSW 2000

T: +61 (02) 8270 8300
F: +61 (02) 8270 8399
E: sydney@rpsgroup.com.au

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Prepared for:

URBANEST

Suite 102, Level 1, Australia Square Building
95 Pitt Street
Sydney NSW 2000

T: (02) 8404 0234
F: (02) 9518 8567
E: astubbs@urbanest.com.au
W: www.urbanest.com.au

1.0 Introduction

Urbanest is proposing to build a managed student accommodation facility at 157-163 Cleveland Street, Redfern. The development will provide affordable accommodation for students in an area where it is in high demand due to its proximity to a number of education institutions and which has excellent access to transport, retail and recreation services.

Pursuant to Schedule 2 of the State Environmental Planning Policy (Major and Regional Development) 2011, the proposed development is considered to be State Significant Development (SSD). This is due to the subject site forming part of the 'Redfern-Waterloo Sites' State Significant Site, within this schedule and the proposed development having an estimated capital investment value greater than \$10 million, at \$29,388,976 (a quantity surveys report is submitted with this application demonstrating the capital investment value).

In accordance with Part 2, Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (adopted 1 October 2011), we hereby seek Director General Requirements to inform the preparation of an Environmental Impact Statement (EIS) for the proposed development:

This submission includes the following information:

- An overview of the site and proposed development.
- Justification of why the site was chosen and the wider benefits that will result from the proposal.
- An overview of consultation undertaken to date for the proposal with authorities and the public.
- An overview of relevant planning framework and permissibility.
- A preliminary assessment of the environmental issues associated with the proposal.
- Attached drawings of the proposal prepared by Bates Smart.
- Attached Quantity Surveyors Report
- Attached completed Request for Director General Requirements form

1.1 Development Objective

The aim of the proposed development is to provide high quality, managed accommodation for tertiary students. The development concept has been driven by principles of high quality design, environmental sustainability and safety.

With the inner city rental market under increasing demand, there is a need for student accommodation which is convenient to local universities, handy to transport and well located for recreation and other services. The development will provide purpose-built well-managed accommodation to help ease rental pressures on the surrounding residential areas and benefit the economic, social and safety prospects of the local community.

The concept for Cleveland Street is based on existing high quality student accommodation facilities developed and managed by Urbanest in Haymarket (Sydney), Brisbane and Adelaide.

2.0 Site & Context

2.1 Location

The subject site is known as 157-163 Cleveland Street, Redfern and comprises land legally described as Lot 50 in DP 826153, Lot 11 in DP 531788 and Lot 1 in DP 449699. The site occupies a whole block and is bounded by Hudson Street to the south, Cleveland Street to the north and Hart Street and Abercrombie Street to the east and west. It is located approximately 280m from Redfern Station and 900m from Central Station and adjoins suburb boundaries of Darlingtown and Chippendale. The site is within walking distance of several universities including Sydney University, UTS and Notre Dame. The site location is shown in Figures 1 and 2 below.



Figure 1: Site location



Figure 2: Site location

2.2 Site Description

The site area is 3360sqm with a 77m frontage to Cleveland Street. It is irregular in shape and uneven in landform with very gentle slopes and dips in natural ground level. Existing improvements include a large 1 to 2 storey warehouse with a 3 storey residential/commercial component on the western side is the factory building is currently occupied by Bursill Sportsgear which is used for the sale and storage of sports equipment and clothing.

2.3 Local Area Context

Surrounding development varies in both scale and land use with both residential and commercial development in the immediate surrounds. The site is bounded by streets on all four sides. Neighbouring development includes:

- North: Opposite side of Cleveland Street comprises a row of 2 to 4 storey buildings including terraces and shop top housing.
- East: Opposite side of Hart Street comprises a residential flat building 4 storeys high and 2 storey commercial building.
- South: Opposite side of Hudson Street comprises a 2 storey commercial development.
- West: Opposite side of Abercrombie Street comprises a 5 storey residential building.

Buildings in the immediate surrounds are generally built to the property boundaries with street wall frontages meeting the public footpaths. Adjacent development varies from single to 5 storeys in height and varies in character with a mixture of old and modern architectural styles.

3.0 Proposed Development

The proposed development comprises a 2-5 storey student housing facility with 404 rooms for up to 461 students and two central courtyards. In order to facilitate the proposed development, partial demolition of two existing buildings and full demolition of a third will be required.

The proposed works are illustrated in the attached drawings prepared by Bates Smart. The estimated capital investment value is \$29,388,976 (see attached Quantity Surveyors Report).

Urbanest will own, operate and manage the facility. Urbanest already provides high quality long term managed student housing at Quay Street in Sydney and in Adelaide and Brisbane. The company aims to help students integrate into the local community and add real benefits to the suburb and universities.

3.1 External Features

The proposed design retains features of the existing built form including the façade of the heritage contributory building and maintains the existing building alignment to Cleveland Street. The works result in a part 2 part 5 storey, with the 2 storey component concentrated along the Cleveland Street frontage. At ground level, the building is predominantly built to the boundary (with 2 minor indented sections along Hudson Street). This built arrangement provides for two large external open space areas towards the centre of the site which can be accessed through the proposed building by the building occupants.

The external features comprise the following.

Built form

- A single building built predominantly to the street boundary on all sides with a central courtyard area.
- 5 storeys on the eastern, western and southern sides, as well as a central building component extending from levels 1-4 (i.e. 4 storeys) and suspended above the ground level courtyard.
- 2-5 storeys along the Cleveland Street frontage.
- The roof contains 4 services enclosures.

Facade

- North: Highly articulated with alternating height levels between the wings and 2 storey components, punched box windows and the retention of the warehouse component façade of the existing building. The western corner of the façade is curved in a manner consistent with the existing building. The lower (2 storey) scale along much of the Cleveland Street frontage will enable the internal façade of the building component behind to be viewed from Cleveland Street.
- East: Levels 1 to 4 of the building are setback behind the retained heritage façade. Balconies are proposed at level 1 along the length of the retained façade.
- West: The western façade is narrow due to shape of the site.
- South: Articulated with alternating façade from recessed components of the façade, punched box windows and Juliet balconies. Balconies line the extent of the rear boundary at ground level.

Open Space and Landscaping

- 932sqm open space/courtyard area to the centre of the development comprising paved and landscaped area, as well as covered area under the central wing. Bicycle racks and storage space are proposed in this area.
- Green roof to exposed roof of first floor along Cleveland Street.
- Balconies as described above.

3.2 Internal Features

The core building communal facilities are concentrated at Ground Level, with accommodation on the upper levels. There are a range of bed configurations including studios and beds with ensuites in units of 3 to 6 rooms, each unit with a dedicated kitchen/lounge. The bedrooms and associated areas will be fully furnished.

- Ground Level: The main entry to the building is contained on the western façade with admin and reception immediately adjacent. The communal internet and study areas, TV/games and laundry are concentrated along the Cleveland Street frontage. The eastern side contains a row of bedrooms addressing the landscaped area of the courtyard and electrical and hydraulic building services. The rear contains beds addressing Hudson Street, the communal kitchen and refuse area with direct access to Hudson Street. There are 39 bedrooms on the Ground Level.
- First Level: Contains accommodation including 116 beds.
- Second to Fourth Level: Contains accommodation including 102 beds per level.

3.3 Operation

- The development will accommodate up to 461 students as well as in-house management 7 days a week.
- Servicing of the site will be via Hudson Street and is limited to small scale deliveries and refuse collection.
- The facility will operate in accordance with established management plan procedures. Urbanest currently owns and operates 1500 student accommodation beds across Australia based on an international service model. With over 20 years experience in the management of student accommodation the operation of the buildings are based on experience but continually refined to adapt to local conditions and changes in the market and regulatory environment.

4.0 Site Selection

Urbanest have had a strong focus on identifying suitable sites in the inner Sydney precinct since 2008. There have been a very limited number of sites identified as suitable for such development. The Cleveland Street site has been identified as a prime location for the proposed student accommodation development for an array of reasons outlined in this section. Community consultation has also been undertaken with limited concerns raised.

4.1 Alternative Sites

Mainly due to issues related to a lack of land availability (both in number of sites and size of sites) and restrictive planning controls, Urbanest has only been successful in securing one 334 bed scheme at Quay Street in four years. Every block of land in the inner Sydney precinct has been routinely investigated for the potential to develop student accommodation to a size that achieves an economy of scale necessary to be viable.

Site Address	Reasons for Dismissal
153 George Street, Redfern	<ul style="list-style-type: none"> Distance from Sydney University Perceived security concerns Single university (Sydney Uni) market Lacking nearby student amenities
43 Australia Street, Camperdown	<ul style="list-style-type: none"> Single university (Sydney Uni) market Lacking nearby student amenities Vendor's price expectations misaligned to development yield permitted on site
55 Regent Street, Chippendale	<ul style="list-style-type: none"> Inability to maximise use of space within existing commercial building Planning control limitations on development Price expectation dictated that current building yields highest value
Harold Park, Raceway	<ul style="list-style-type: none"> Considerable distance from universities Lacking nearby student amenities Within new residential precinct
444 Jones Street, Ultimo	<ul style="list-style-type: none"> Conversion of existing heritage building to residential use not supported by Council, Accessibility to transport links
53 Balfour Street, Chippendale	<ul style="list-style-type: none"> Smaller site (<1000m²)

	<ul style="list-style-type: none"> Within low rise, terrace house residential precinct
144 Commonwealth Street, Surry Hills	<ul style="list-style-type: none"> Smaller site (<1000m²) Within low rise, terrace house residential precinct

4.2 Reasons for Selection

Urbanest has chosen 157-163 Cleveland Street, Redfern as a site highly suitable for the proposed student accommodation development. The reasons for its selection are provided in detail below.

Locational

- Inner city suburbs such as Redfern are experiencing very strong demand compounded by a city-wide shortage in rental accommodation and housing supply. The growing number of students coming to Sydney is adding to that demand. Many students are finding it very hard to get well maintained and safe accommodation within a reasonable distance to the universities and other services and are often forced into the highly competitive rental market.
- The Cleveland Street site is ideally suited to student accommodation, being handy to Sydney University, the University of Technology Sydney, Notre Dame university and TAFE. It is close to public transport with Redfern railway station just 400 metres away and benefits from bus routes servicing all key areas of the CBD and surrounds immediately available on Cleveland Street.
- Extensive due diligence undertaken by urbanest and a review of the reasons for failure of previous proposals has demonstrated that student accommodation represents the highest and best use of the site. It is believed that the student accommodation proposal presents an ideal opportunity to rejuvenate an unattractive site for the benefit of all stakeholders.
- Through the proposed redevelopment of the site, an increase in activity to the area will bring economic and social benefits to the community in addition to releasing rental stock back to the market through the use of the facility by students in preference to local residential properties.

Environmental

- The site's physicality is highly suitable for a student housing development having regard to its size, shape proximity to services and transport and site surrounds.
- The immediate surrounds comprise a mixture of residential and commercial land use types that will be compatible with the proposed student accommodation use.
- The site orientation and features enable an appropriate scaled development that achieves good amenity for the students without significantly impacting the amenity of surrounding land uses.

Strategic

- Demand for student accommodation within Sydney is likely to continue to grow. Both the NSW State Government and the City of Sydney support the growth of the education and research sector, and have identified the area within which the site is located as an education precinct.
- The education sector makes important direct contribution to the NSW economy both as an employer and a major export (second only to coal) and indirectly by ensuring a skilled workforce is available for industry,

innovation and research is quickly diffused into the local economy and helping Sydney maintain its competitive position as a Global City.

- Housing affordability is a key issue for Sydney and lack of attractive and affordable accommodation for students is likely to reduce the attractiveness of Sydney to international students.
- Traditional forms of industry including manufacturing and wholesale are declining within the City of Sydney. The future workforce would need to be increasingly skilled to fill roles within the growth sectors including professional, scientific and technical services, administrative and support services and public administration and safety and education and training. Importantly, residents close to the site have the skills to capture the benefits associated with forecast job growth.

Economic

- The proposed development would result in the loss of employment land to residential uses. This is a negative macro economic impact.
- The education and research sector provides a significant and growing contribution towards the economic based of NSW. The proposed development would support this sector by providing good quality facilities that meet the needs of students, particularly international students, and ensure that Sydney remains competitive in the global tertiary education sector.
- The construction cost would create additional economic benefits of \$78m through the multiplier effect.
- The construction process would support 865 job years.
- Existing employment on the site is estimated to be between 8 and 10 jobs, when if the site were redeveloped for warehousing uses it would support between 17 to 28 jobs. Eleven permanent jobs (full and part time, or approximately 8 full time equivalents) would be created post construction. The permanent jobs created would be more appropriately aligned to the future direction of employment in the area than those currently provided.
- Students of the new development would have available some \$4.93m of retail expenditure per annum, which would increase over time as a result of increases in real retail spend.
- An estimated \$2.59m of retail expenditure would be available to support local retail facilities, which could equate to 15 additional, permanent jobs supported directly in the local area.
- Overall, the proposed development would support an estimated 26 direct jobs on and off-site post construction. This represents a change of between -2 and +9 jobs on the site compared to the direct employment which could be provided if it were redeveloped for alternative warehousing uses.
- The development would create an investment stimulus for the surrounding area and project a sign of confidence in the local market.
- Release of rental stock back to the market through the use of the facility by students in preference to local residential properties.

Social

- Contributing to a socially cohesive community.
- Incorporating the sites industrial past in to the new building fostering a sense of place and interest.
- Providing good quality and affordable housing for students helping to attract students to Sydney.

- The accommodation is in an area that provides the shops, services, recreational and leisure facilities students are likely to use, without placing undue pressure of the level of service provision for the existing community.
- The site benefits from an exceptional level of access to public transport and local facilities, negating the need for students to own or use private vehicles and as a consequence facilitates incidental exercise, making a positive contribution to the health and well being of the students.
- Safety and security would be enhanced (post construction) as a result of increased activity on local streets, 24 hour on site staff and enhanced passive surveillance.
- The level of amenity would be negatively impacted in the short term but once completed, the proposal would significantly enhance the aesthetic appearance of the area, renewing a tired industrial building, incorporating high quality new elements, without diminishing the level of amenity currently enjoyed by the existing community.
- The release of private residential stock currently occupied by students back to wider market through placement of students in a managed, safe and secure environment providing a single point of contact between the student community and local community.

4.3 Consultation Undertaken to Date

4.3.1 Consultation with Authorities

Throughout the life of this project and its development, there has been ongoing consultation with the Department of Planning and Infrastructure, Redfern Waterloo Authority and City of Sydney. There has been a commitment to consider feedback on the development from these authorities and keep them involved in its progress.

The following table provides a summary of the meetings undertaken with authorities to date. In all instances Tim Moore (RPS), Guy Lake (Bates Smart), James Childs (Urbanest) and Andy Stubbs (Urbanest) were in attendance.

Date / Time	Authorities in attendance	Matters discussed/outcomes
12 May 2011 10am	Redfern-Waterloo Authority - Jason Perica Director Planning and Urban Renewal.	<ul style="list-style-type: none"> ▪ Merits of a student accommodation use to the bulk/scale prescribed by a 3:1 FSR acknowledged ▪ No significant objections or concerns raised. ▪ Basis of the approval for the 3:1 student accommodation FSR was via a SEPP1 Objection to a Development Standard.
26 May 2011 11am	City of Sydney - Bill McKay Manager of Development	<ul style="list-style-type: none"> ▪ Bill advised that SCC would consider student accommodation as residential however it was acknowledged that there was a logical argument to justify a variation of the control from 1:1 to 3:1 subject to demonstrating high level of compliance with Residential Design Code SEPP65. ▪ Merits of a student accommodation use to the bulk/scale prescribed by a 3:1 FSR acknowledged and no significant objections or concerns raised.

		<ul style="list-style-type: none"> No issues raised with SEPP1 Objection approval pathway.
13 July 2011 1pm	Department of Planning (now Department of Planning and Infrastructure) <ul style="list-style-type: none"> Anthony Witherdin Team Leader 	<ul style="list-style-type: none"> The merits of a student accommodation use to the bulk/scale prescribed by a 3:1 FSR were acknowledged, no significant objections or concerns raised with either the use, bulk/scale of SEPP 1 Objection approval pathway. Department advised that they would give greater consideration to City of Sydney's recommendations as a referral authority
26 July 2011 9am	City of Sydney <ul style="list-style-type: none"> Graham Jahn, Director of City Planning & Regulatory Services and advisor to Clover Moore 	<ul style="list-style-type: none"> Whilst City of Sydney acknowledged the merits of a student accommodation use to the bulk/scale prescribed by a 3:1 FSR, it was stated they would not support a SEPP 1 objection as an avenue for approval due to the magnitude of the variation. Recommended a formal application to vary the development standard under the Major Development SEPP.
5 August 2011 1:30pm	Department of Planning and Infrastructure <ul style="list-style-type: none"> Dan Keary, Acting Executive Director Major Project Assessments 	<ul style="list-style-type: none"> Discuss City of Sydney's feedback and determine the most appropriate approval pathway. Merits of a student accommodation use to the bulk/scale prescribed by a 3:1 FSR acknowledged and no significant objections or concerns raised. Resolved that varying the Major Development SEPP was the most appropriate way of seeking approval for the 3:1 student accommodation FSR. Advised that varying the SEPP could and should be run concurrently with assessment of the development application to provide clarity on the outcome.
22 August 2011 2pm	Redfern-Waterloo Authority (Sydney Metropolitan Development Authority) <ul style="list-style-type: none"> Jason Perica, Director Planning & Urban Renewal 	<ul style="list-style-type: none"> Provided an update on the design development and the revised approval pathway (varying the SEPP and concurrent DA). No significant objections or concerns raised.
5 September 2011 12pm	Department of Planning and Infrastructure <ul style="list-style-type: none"> Chris Wilson, Executive Director Major Project Assessments Michael Woodland 	<ul style="list-style-type: none"> Seek agreement between Dan Keary's and Chris Wilson's opinions on the merits of a student accommodation use to the bulk/scale prescribed by a 3:1 FSR along with application vary the SEPP and concurrent DA submission. No significant objections or concerns raised.

4.3.2 Community Consultation

In addition to the above, there have been extensive efforts in consulting with the community and general public during the design development process with the engagement of a community consultation specialist. The objective of the consultation program was to engage with the community and other stakeholders, provide opportunities for their views and preferences to inform the project where possible, and to inform the Department of Planning and Infrastructure of the views and concerns of the community/stakeholders about the project.

Information regarding the nature of the proposal has been accurately and widely distributed.

Methods of distribution of information have included:

- letters to key stakeholders,
- meetings with community group representatives and other stakeholders,
- community newsletter,(distribution of 1890),
- purpose built website,
- public open day, and
- dedicated telephone enquiry line.

Community and stakeholder feedback was encouraged and recorded.

A dedicated consultation website was established at <http://www.urbanest.com.au/157cleveland/> for stakeholders to learn about the proposal, provide feedback and pursue specific enquiries.

A dedicated telephone enquiry line, 0435 830 868, has been established to allow stakeholders to provide feedback and pursue specific enquiries about the project.

A community newsletter was distributed to inform residents of changes made to the proposal as a result of the previous proponent's consultation and invite them to the open day to view the urbanest proposal and ask questions or submit enquiries about specific issues of interest.

Community Open Day – A community open day was held at Redfern Community Centre, Hugo St Redfern, from 9:30am-12:30pm, Saturday 17th September, 2011. A series of information panels were on display updating stakeholders on the urbanest proposal and the numerous changes made to the project as a result of the consultation. Stakeholders were encouraged to ask questions about any specific issues of concern and/or submit written requests for information about specific issues. Four groups attended the open day, two of which were representatives from local resident action groups.

Members of the community were also offered the ongoing opportunity to arrange one on one meetings with representatives of the proponent to discuss specific issues of concern. No approaches to arrange any meetings have been received as at the date of providing this report.

To date five submissions have been received through the project website as a result of the community consultation completed to date. These submissions generally requested additional design. The project website itself has generated 400 page views.

5.0 Planning Context

The subject site is located in the Redfern-Waterloo Operational Area and governed by the Redfern-Waterloo Authority under the Redfern-Waterloo Authority Act 2004. Local zoning and development standards for Redfern-Waterloo are found in the State Environmental Planning Policy (Major Development) 2005. This SEPP states that no other environmental planning instruments (except other SEPPs) apply to Redfern-Waterloo. Therefore, there are no applicable Local Environmental Plans to this proposal. A consideration of Development Control Plans is not required for State Significant Development. The applicable planning controls for this project are limited to the SEPPs below.

- State Environmental Planning Policy (Major Development) 2005
- State Environmental Planning Policy (State and Regional Development) 2011
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy 55 – Remediation of Land

5.1 State Environmental Planning Policy (Major Development) 2005

5.1.1 Permissibility

The subject site falls within the Business - Mixed Use Zone under the Major Development SEPP. The SEPP states that any use not prohibited in the zone is permitted with consent. The proposed use for student accommodation is not listed as a prohibited use and is therefore permissible. The proposal is also fully consistent with the objectives of the zone, provided below.

(a) to support the development of sustainable communities with a mix of employment, educational, cultural and residential opportunities,

(b) to encourage employment generating activities by providing a range of office, business, educational, cultural and community activities in the Zone,

(c) to permit residential development that is compatible with non-residential development,

(d) to maximise public transport patronage and encourage walking and cycling,

(e) to ensure the vitality and safety of the community and public domain,

(f) to ensure buildings achieve design excellence,

(g) to promote landscaped areas with strong visual and aesthetic values to enhance the amenity of the area.

5.1.2 Development Standards

The applicable development standards are contained within Schedule 3 of the Major Development SEPP, including Floor Space Ratio (FSR) and building height. The proposal complies with the 5 storey building height standard. FSR is addressed below.

Floor Space Ratio

The SEPP nominates a maximum floor space ratio (FSR) for the site of 3:1 and 1:1 for residential development. The development achieves an FSR of 2.95:1.

Although student accommodation is a development type which is markedly different to permanent residential accommodation, planning investigations have concluded that student accommodation would most likely be classified as a type of residential accommodation. Therefore the proposed development with an FSR of 2.95:1 would not meet the applicable FSR control. Whilst there are no objectives for this FSR control, the objectives of the zone are fully satisfied by this proposed development.

Discussions to date with DP&I, SMDA and the City have generally revealed support for the merits of the proposed development and the FSR sought. From these discussions it has been concluded that the non-compliance will be addressed by seeking an amendment to Clause 21 of Schedule 23 of the Major Development SEPP, concurrent with the submission of the DA for the proposal. The amendment would allow student housing with a maximum FSR of 3:1 on this land. Accordingly, a request to amend the Major Development SEPP is currently in preparation and will be submitted to the DP&I concurrently with the lodgment of the Development Application for this development.

5.2 State Environmental Planning Policy (State and Regional Development) 2011

The State Environmental Planning Policy (State and Regional Development) 2011 (State and Regional Development SEPP) was adopted on 1 October 2011 and identifies State Significant Development (SSD). Schedule 2 of the SEPP identifies 'Redfern-Waterloo Sites' as shown on the map as being SSD where the capital investment value is more than \$10million. The subject site falls just within the boundary of the Redfern-Waterloo Sites map. The provided quantity surveyors report confirms the capital investment value will be \$29,388,976 and is therefore SSD.

Clause 11 of the State and Regional Development SEPP states that Development Control Plans do not apply to SSD.

5.3 State Environmental Planning Policy (Infrastructure) 2007

The subject site is located adjacent to two classified roads (Cleveland Street and Abercrombie Street) and is therefore subject to provisions of the State Environmental Planning Policy (Infrastructure) 2007. Under clause 101 of the SEPP, there are several considerations for development with a frontage to a classified road. These have been considered in the design development and will be addressed in the EIS. The car free development promotes the use of active forms of travel and public transport. This removes potential conflict with vehicle entry into the site and the adjacent classified roads.

The proposed development does not satisfy any of the categories of traffic generating development under Schedule 3 of the State Environmental Planning Policy (Infrastructure) 2007 and is therefore not traffic generating development. It is noted that apartments or residential flat buildings are considered traffic generating development where they contain 300 or more dwellings. Although a similar physical form of development to student housing, as affordable housing for students, such development generates very low vehicle and traffic demand.

5.4 State Environmental Planning Policy No 55 – Remediation of Land

This policy introduces state-wide planning controls for the remediation of contaminated land. It states that land must not be developed if it is unsuitable for a proposed use because it is contaminated. Contamination has been considered with the undertaking of Stage 1 and Stage 2 investigations. These will be included in the application submission.

6.0 Preliminary Assessment

This information has been compiled to assist in the preparation of the Director General's Requirements to guide preparation of the Environmental Impact Statement. The key environmental considerations associated with the proposed development are listed below. Specialist studies will be undertaken as part of the proposal to assist in addressing these issues.

6.1 Access, Transport and Traffic

A traffic report will be prepared for the proposed development, which will assess traffic generation, car parking, access arrangements and circulation. The site benefits from excellent access to public transport and the proposed use generates very low car parking demand. This provides an opportunity to exclude onsite car parking and encourage the utilisation of the available public transport facilities and active means of travel, in line with Council objectives. This will be detailed in the traffic report.

6.2 Visual Impact & Heritage

As described in Section 2.0, built form in the area varies in scale and style. Whilst the proposed height is consistent with the controls and development in the area and the scale is not inconsistent with its surrounds, the FSR is beyond that permissible under the current development controls in consideration of the student accommodation as a residential use. This is reflected in that the proposal does not exceed the development potential contemplated by the FSR control for all other uses. The visual impacts associated with the proposed development will be considered in a visual impact assessment prepared as part of the EIS.

The site is not a heritage item, but is located within the Darlington Conservation Area (CA17) under the South Sydney Local Environmental Plan 1998. On the Contributions Map for this area, the warehouse portion of the building is identified as being contributory with the western more modern component detracting. Even though Local Environmental Plans do not apply to the site (see Section 5.0 of this report), this is included as a consideration. There are also several heritage items located in the vicinity of the subject site including 56-60 Balfour Street Strickland Buildings and 117-131 Abercrombie Street Dangar Terrace. A heritage consultant has been engaged and will prepare a Heritage Report in relation to the proposal.

6.3 Overshadowing

The proposal will result in an intensification of the current built form on site and is likely to result in increased overshadowing to surrounding land. Overshadowing impacts will be considered throughout the detailed design of the proposed building and addressed in the EIS.

6.4 Safety

Local safety is a consideration for development on the site. The proposed use will contribute to enhancing local safety with surveillance and increased activity and appropriate security systems in accordance with relevant Management Plans. This will be considered and addressed in the application.

6.5 Noise

The predominant source of noise at the site is likely to be traffic noise from Cleveland Street. Appropriate building design will ensure that the impacts of noise on residents are addressed.

No significant acoustic impacts are expected as a result of the proposal. Aside from noise (within permissible levels) associated with the operation of student accommodation facility, the only other sources of noise are expected to be in relation to the air conditioning plant. The built form will act as a buffer to noise generated from the open space areas at the centre of the site. A noise report will be prepared to accompany the proposed application.

6.6 Sustainability

The proposed building aims to achieve high levels of sustainability in both mechanisms applied to the development and removing reliance on car usage. An ESD report will be prepared which will assess the proposed features of sustainability.

6.7 Contamination and Geotechnical

Stage 1 and a limited Stage 2 Investigations have been conducted on the site which conclude that the site is suitable for the proposed future development. It recommends further investigations to be conducted should significant earthworks be undertaken.

6.8 Infrastructure

The site is currently serviced by electricity, gas, sewer, water, stormwater and telecommunications. The adequacy of these to service the proposed development will be assessed and any necessary relocations or upgrades will be determined.

There is an underground stormwater asset reaching the end of its life cycle that runs through the site that needs upgrading. Discussions with Sydney Water to agree on a solution for the proposed development have commenced and indicate that there is an acceptable solution.

6.9 Waste Management

The proposed development will generate a variety of solid and liquid waste materials, including municipal solid waste. Waste management will be considered as part of the assessment.

6.10 BCA Compliance

The proposed development will comply with the relevant provisions of the BCA. A compliance report will form part of the EIS.

6.11 Construction Impacts

Construction impacts associated with the proposal will be addressed in a detailed Construction Environmental Management Plan (CEMP), which will be prepared for inclusion in the DA submission. It will address how the existing buildings will be demolished and new buildings constructed safely with minimal impact on the locality.

7.0 Conclusion

This submission provides information to assist in the preparation of DGRs for the proposed student accommodation development at 157-163 Cleveland Street, Redfern. The issues discussed in this report are considered to represent the key environmental considerations associated with the proposal and adequate to inform the Director Generals Requirements.