

Response to Submissions

State Significant Development Application - SSD-5700-2012



Block 4S, Central Park

Student Accommodation and Ground Floor Commercial Uses

Submitted to Department of Planning and Infrastructure
On Behalf of Central Park JV No 2

May 2013 ■ 12373

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This report has been prepared by Stephen Gouge

Signature



Date 29/05/2013

This report has been reviewed by: Gordon Kirkby

Signature



Date 29/05/2013

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1.0 Introduction

An Environmental Impact Statement (EIS) for the application for State Significant Development (SSD) for student accommodation and ground floor retail uses to Block 4S of Central Park (previous known as the Carlton United Brewery). The application was publicly exhibited for a period of 5 weeks between 27 February 2013 and 2 April 2012.

The proponent, Central Park JV No 2, has reviewed and considered the submissions and has responded to the issues raised. This Response to Submissions (RTS) sets out the proponent's response to the issues raised, and details several amendments to the proposed development.

A total of 41 submissions were received by the Department of Planning and Infrastructure (DP&I) in response to the exhibition as follows:

- State authorities and agencies - 4
- Council of the City of Sydney - 1
- Public Submissions – 35 (of which some 15 are pro-forma).

The four agencies submissions, made by the Office of Environment and Heritage, Sydney Water, Transport for NSW and Roads and Maritime Services, none of which raised any concerns with the proposed development.

Section 4 summarises a summary of the proposed amendments.

This Response to Submissions (Additional Information) should be read in conjunction with the Block 4S - EIS prepared by JBA dated February 2013, as well as the following applications which were submitted concurrently:

- Modification to the Approved Concept Plan (MP 06_0171 (Mod 8); and
- Modification to Project Approval for Blocks 1 and 4 (MP08_0253)

Due to the interrelationships between the three applications, there is a level of overlap in the issues raised in the submissions. The Response to Submissions / PPR for the above applications should be referred to when reading this response.

2.0 Key Issues and Proponent's Response

The Department of Planning and Infrastructure raised five matters that it wished to have addressed in relation to the development. The proponent's response to these items is provided below.

The following issues were raised by the Department of Planning and Infrastructure (DP&I):

- Urban Design
- Residential Amenity
- Environmental Impacts
- Public Domain
- Density

In addition to the above, the Department requested that some additional information be provided to support the proposed modifications. This is also addressed below.

A detailed response to all of the issues raised by other agencies, Council and the general public during the public exhibition period is provided at **Appendix A**. Whilst the responses received from agencies and Council have been addressed individually, the public submissions have been addressed on an issue-by-issue basis. This approach has been adopted due to the significant amount of repetition in the submissions.

2.1 Urban Design

2.1.1 Building Separation

Issue

The DPI has requested consideration be given to increased separation between proposed buildings on Blocks 4N and 4S. This would respond to the separation of the previously linked buildings and the two distinct separate land uses proposed (commercial and residential). The Department considers that this could provide the following opportunities and respond to the separation of the previously linked buildings and the two distinct separate land uses proposed (commercial and residential)

- provide a high quality pedestrian link into the site from Abercrombie Street;
- reduce the appearance of bulk of the buildings when viewed from Abercrombie Street and within the site;
- increase opportunities to provide solar access to units within Block 4S; and
- Improve visual privacy to residents of Block 4S, allowing for improved residential amenity through a reduction on the reliance on privacy glass.

Proponent Response

The proposed separation between Block 4N and Block 4S is largely established by way of the existing approved Concept Plan. The proposed separation design of the northern elevation of Block 4S and the public domain and landscape treatment provide a clear separation between these two buildings, whilst providing a high quality pedestrian link from Abercrombie Street into Central Park.

Due to the proximity of Block 4N and size of the approved envelope, along with the orientation of the building, a greater separation distance would have a negligible impact on improving the solar access afforded to the northern elevation of Block 4S. The proposed separation distance from Block 4N to the north is illustrated at on the revised architectural plans (drawing 5774 **Appendix A**) as 12.591m shown in **Figure 1**.

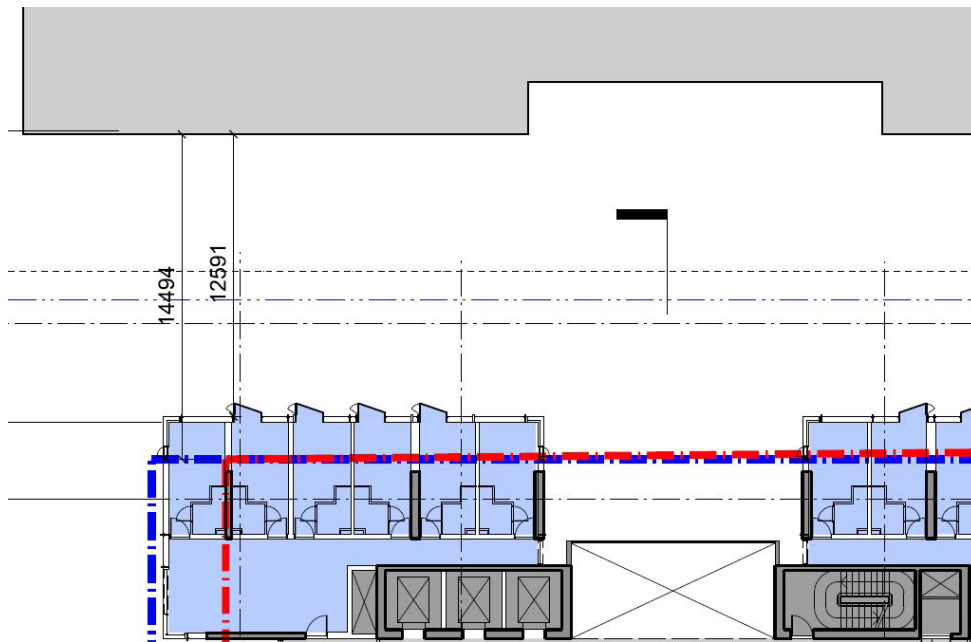


Figure 1 – Separation distances between block 4N and 4S

Given the separation distance between these two building, the northern elevation of Block 4S has been carefully designed (see revised architectural plans at **Appendix A** and additional diagrams at **Appendix B**) to provide aspect and privacy and to remove the reliance on privacy glass. The revised treatment of these elevations includes the following

- Removal of the existing privacy glass and replacement with vision (clear) glazing
- Installation of adjustable vertical metal louvers within the apartments
- Maintenance of the ventilation panel that also allows views out of the multi-bed apartment rooms
- Prevents the potential for direct overlooking between the commercial and residential uses.
- Allows for the penetration of sunlight between the louvres

As shown below in **Figure 2**, the proposed design will mitigate any direct overlooking whilst providing high levels of internal amenity to residents.

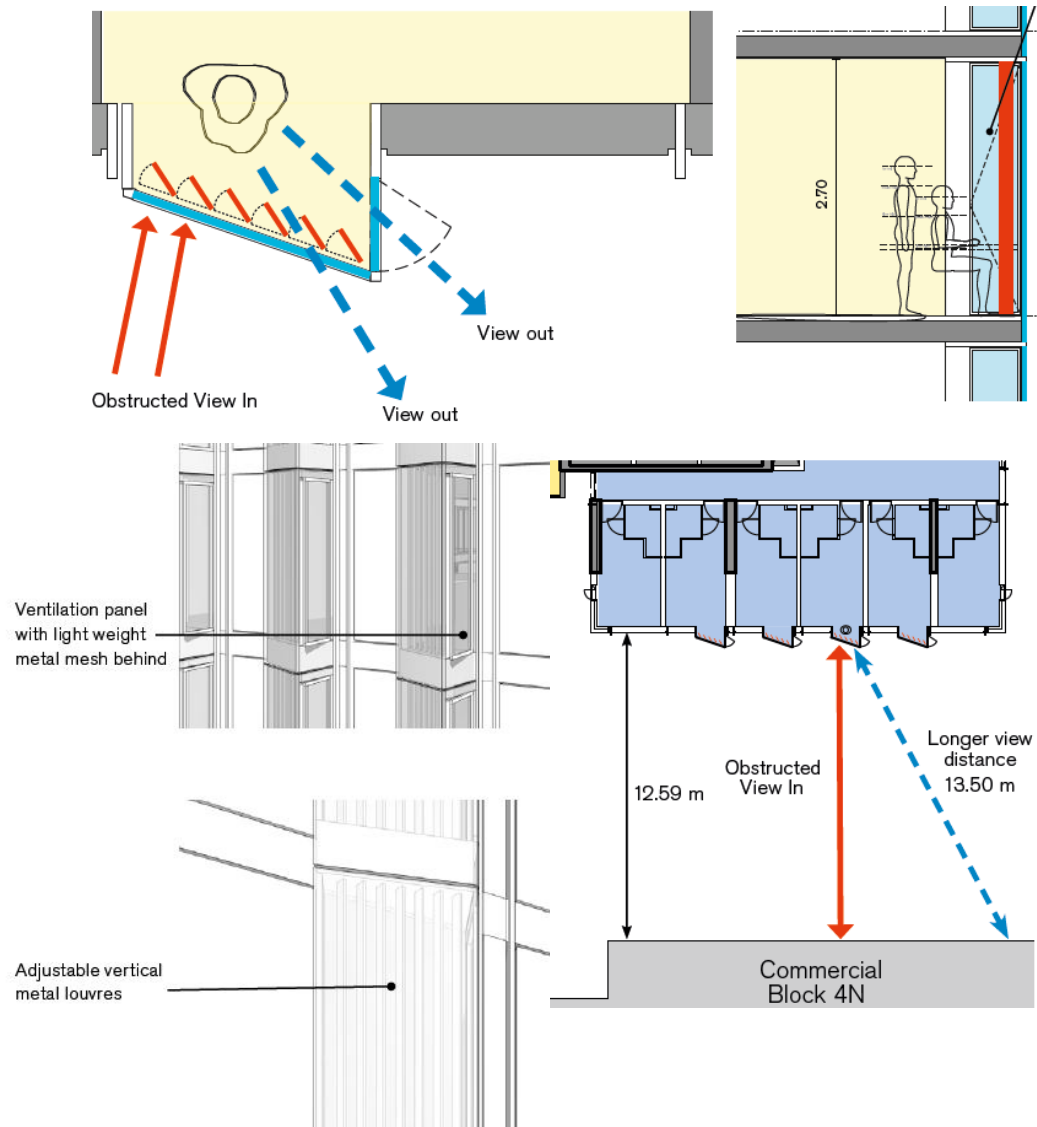


Figure 2 – Revised window treatment

The proposed privacy blinds/louvers will be operable to provide occupants control over the penetration of light and privacy as desired.

It is considered that given the context of the site, existing concept plan envelopes and the treatment measures proposed to the northern windows, suitable amenity will be provided to future residents of Block 4S and commercial tenants of Block 4N.

2.1.2 Building Articulation

Issue

The DPI have identified a concern over the lack of building articulation which they consider would assist in reducing the appearance of bulk of the building's east and west elevations.

Proponent Response

Building articulation is discussed in the EIS which includes the use of materials, articulation, colour and setbacks to reduce the buildings appearance at the eastern and western elevations.

As detailed in the Urban Design Report the datum line (as established by the Concept Plan) has been used to establish a 'neck' zone above the podium, which respect the scale of the heritage buildings at the corner of Broadway and Abercrombie Street. Above the podium at level 3, the facade is recessed which reinforces the pedestrian scale of the building and lower level activation to Abercrombie street, as well as Irving Street. This can be seen in the perspectives and montages provided as part of the EIS and as annotated at **Appendix B**.

Figure 3 below has been taken from the urban Design Report and indicated the Datum line (red dashed line) established by the Concept Plan. The Datum line was included within Concept Plan aimed at reinforcing the pedestrian scale of future development on the site. The proposal is consistent with this element, incorporating horizontal elements of the adjoining heritage hotel, which was used in part to establish the original Datum.

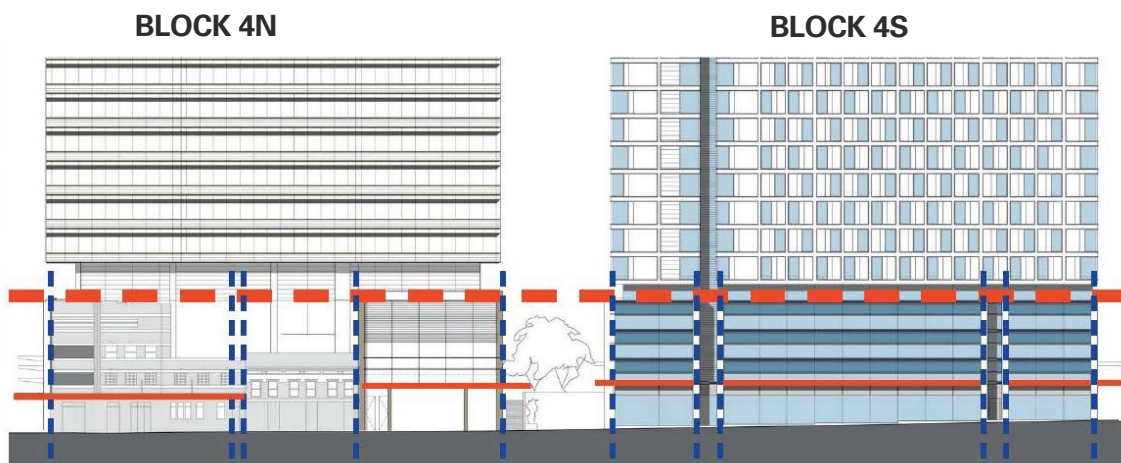


Figure 3 – Datum line and pedestrian scale (datum line indicated by red dashed line)

Materials and scale which respond to the adjoining and surrounding buildings have also been used, with particular reference to the stone clad fin elements and materials to the podium. Expression and articulation of the individual units is conveyed through a superstructure on the facade as shown in **Figure 4**.

Articulation to the built form is also provided to the upper levels of the proposal through the terrace and stepped built form (to the south) and the screened and setback cooling towers.



Figure 4 – Building Articulation Diagram (Source: Foster +Partners)

Vertically, the building incorporate a number of channels to the eastern and western elevation which breaks down the lengths of horizontal facade predominantly along Abercrombie street and provide improvement amenity to common living areas whilst creating interest and modulation in the facade. These vertical elements are incorporated to the podium levels and carry up through the building, as illustrated in **Figure 3** above.

Finally, the windows to the units are setback from the facade, and include operable elements to allow for natural ventilation within the units. The result of these elements, particularly on the eastern and western facade will provide a further level of complexity, relief and articulation in the facade, breaking up the appearance of bulk. The proposed form is therefore considered to be a well considered design response.

2.2 Residential Amenity

2.2.1 Solar access

Issue

The DPI have stated that the proposed provision of solar access to only 42% of the units for 3 hours between 8am and 5pm on 21 June and only 64% would receive 2 hours of sunlight between 8am and 5pm on 21 March. As such they have suggested consideration should be given to opportunities to increase the number of bedrooms which receive sunlight at mid-winter. In addition, confirmation has been requested of the number of bedrooms which receive at least 2 hours of sunlight between the hours of 9am- 3pm and 8am-5pm, on 21 June.

Proponent Response

The proposal has considered the principles of SEPP 65 and adopted the rules of thumb within the RFDC within the development where possible. The key Principles of SEPP 65 have been adopted in the design approach of the proposal. Solar Access diagrams have been prepared by Foster +Partners (**Appendix B**) that illustrates the number of units/bedrooms that receive solar access. Based on the solar study prepared by Foster +Partners, a total of 30% of bedrooms would meet the criteria of 2 hours of solar access between 8am and 5pm on 21 June. It is however noted that the direct application of the rules of thumb contained within the RFDC is not appropriate for a student accommodation building as previously noted by the DPI.

The proposal has been designed to provide high levels of amenity to the communal areas as well as the living areas within the multi-share apartments. The calculation of solar access to these areas is consistent with the approach that would be used for a residential flat building in the same location (the critical elements being solar access to communal and living areas). Basing the solar access calculation received to the number of bedrooms is therefore considered to be onerous, as it would in effect require a higher standard of solar than that of a comparable residential flat building.

2.2.2 Proximity/Separation and Design

Issue

The DPI has raised concern over the proximity of the proposed building on Block 4N (12.5m), and the distance between facing habitable room windows on the internal building facades of the proposed building (12.7m) with regard to the potential privacy issued. Concern is raised in relation to the proposed reliance on privacy glass to those units to address this, and the resulting reduced amenity to residents. It is considered that internal window treatments could be adopted to address potential solar gain to units however; further consideration should be given to addressing potential privacy issues without adverse impacts on resident amenity

Proponent Response

As discussed previously, the design of the northern facade has been reviewed in response to the submission from the DPI. The review of the design and treatment of the northern elevation in particular has removed the strong reliance on privacy glass, and in its place, internal window treatment has been considered including internal blinds and louvers.

As shown below in **Figure 4**, the internal facade have been treated with three alternative designs that consider privacy, and solar access. The upper levels have

reduce levels of glazing and window sizing whilst the lower and internal rooms are provided with

Type 1

- Type 1 facades are located on the upper levels of the courtyard. This portion of the façade is subject to the greatest solar exposure and has the same vision glass dimensions as used on the East and West facades.

Type 2

- Type 2 facades receive less direct sunlight and the opportunity to increase the size of the vision glass has been embraced to admit more daylight to these studios.

Type 3

- Type 3 facades are located in the deepest portions of the courtyard that are the most shaded. Units in these areas are provided with bay windows to open their view to the south where the courtyard is not enclosed.

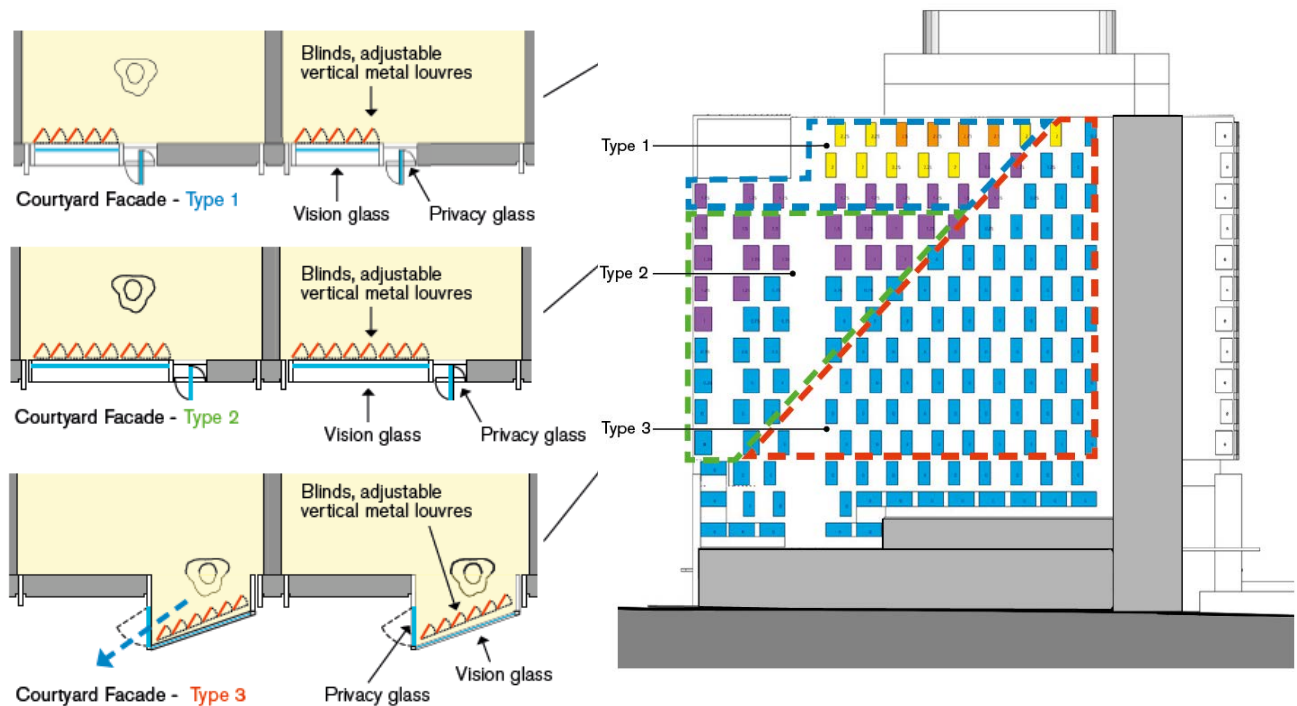


Figure 5 – Internal facade design and privacy treatment

2.2.3 Elevator Capacity

Issue

Concern is raised in relation to the low number of lifts available for use for residents, only 3 for 826 students, which has a student/lift ratio of between 1:12-1:21 for various floors. Consideration should be given to the provision of additional lifts.

Proponent Response

The number and size of the elevators within the building have been assessed by WSP and can appropriately accommodate the total number of residents. The passenger lifts are 1,275kg / 17pax @ 2.5m/s and the goods lift is 2,000kg / 26pax @ 1 m/s.

Given the use of the building as student accommodation, the occupants inherently have various movements, timetables and use requirements of the lifts throughout the day. This is in contrast to a commercial/residential tower where high demand is placed on elevators during peak times during the day (morning/lunch/evening).

Furthermore, the design uses principles adopted in comparable student accommodation facilities such as UTS Harris Street where student residents will utilise the stairs between levels to access both fellow students as well as the communal areas located throughout the building (located on every second level). The two stairs within each wing are designed with hold open devices, and glazed wall to enable day light in as well as some cross ventilation. The stairs have been designed to be adjacent to the communal area as they are commonly used as meeting places in addition to the communal areas.

2.2.4 Internal Arrangement of Studios

Issue

Further information is requested as to the justification of the proposed arrangement for courtyard facing studios in terms of having either bay windows with privacy glass or fixed vision glass.

Proponent Response

The internal room configurations, facade treatment and selection of materials to the windows have been reconsidered in response to the submission from the DPI (see **Figure 5** and **Section 2.2.2** above). Specifically the arrangement of the eastern and western facing (internally facing) units has been considered. As shown on the revised architectural plans (**Appendix A**) and additional diagrams (**Appendix B**).

The arrangement and size of the units has been revised slightly. Plans shown the revised furniture layout and dimensions are provide at **Appendix A**. An excerpt of these has been providing below in Figure 6. Importantly, the revised design is compliant with the relevant provisions of the AHSEPP, Sydney DCP (as a guide) and relevant codes requirements including Section J – energy efficient. A revised ESD report has been prepared by WSP Built Ecology (**Appendix K**).



2.3 Environmental Impacts

2.3.1 Visual and Acoustic Privacy

Issue

The DPI have requested that further assessment should be provided as to the potential noise impacts generated by the use of the proposed student accommodation and retail uses, on existing and future surrounding residences. This should include noise sources in addition to the mechanical plant, identified in the Acoustic Report.

Concern is also raised in relation to the potential impacts on the visual and acoustic privacy of future residents of Block 8, in particular with the potential impacts from the proposed roof top gardens. Details should be provided as to how the areas will be managed to ensure no negative impacts. This should include details of the proposed management of the terraces, addressing how student numbers will be managed and any proposed restrictions on hours of access, taking into consideration Council's recommendation.

Proponent Response

A revised Acoustic advice has been prepared by Acoustic Logic (see **Appendix H**) which considers the potential impacts to the amenity of surrounding land uses. The report is supplementary to the report prepared for the EIS and considers the use of the outdoor terraces, and provides recommendation for operational management procedures.

In accordance with the recommendations of the acoustic report the preliminary Plan of Management submitted with the EIS has also been updated (see **Appendix E**). The Plan of Management has been revised to include details of the operation, management and use of the outdoor areas within the proposed development to ensure any potential privacy impacts (acoustic and visual privacy) are mitigated.

The additional acoustic report concludes that the acoustic design of the project includes the suitable environmental criteria for noise levels generated on the site. It is noted that noise generated on the external terrace would not typically fall within the legislative criteria for the site and it is not a licensed area or commercial activity. However, the project management controls include a restriction on the hours of operation (such as external terrace closed after 10pm) of the external terrace to ensure noise levels do not impact surrounding receivers.

Based on the proposed management controls and building construction the proposed noise generated from the use of the outdoor terraces on the upper level and level 1 of the proposed development will not negatively impact the amenity of the existing and future planned uses to other blocks within the Broadway development site (including Block 8).

As detailed in the revised plan of management, the external area (upper level and level 1) within the proposed development will be restricted beyond 10pm.

The ground floor of the proposal incorporates non-residential uses encouraging activity at street level consistent with the aspirations of Council and the DPI. As with all retail there is the necessity to obtain separate approval for the fitout and use of these tenancies wherein operation hours will be managed.

Internal Acoustic Amenity

Internal noise levels will be provided in accordance with criteria as detailed within the Australian Standard AS 2107:2000 and the Central Sydney DCP. The Noise Impact Assessment conducted at the site and provided includes the recommended

acoustic treatments to ensure internal noise levels comply with the relevant criteria.

The acoustic design of the internal building elements separating units will be conducted such that compliance with the minimum requirements of the BCA are achieved. The party walls within the project will be designed to achieve a minimum of $R_w + C_{tr} 50$.

2.4 Public Domain

Issue

The DPI have requested the design of the pedestrian link between Blocks 4N and 4S be reviewed for opportunities to maximise the quality and efficiency of the pedestrian link, given the importance of the through link as a main pedestrian thoroughfare, as noted in the EIS's Safety Management Strategy and other supporting documents. Measures could include maximising opportunities for pedestrian trafficable area and the provision of street furniture.

Proponent Response

Pedestrian Link

The public domain plan prepared by JAA +Turf Design has been revised in response to the amendments to the architectural plans and is provided at **Appendix D**. In addition, comments have been sought from Elton Consulting regarding the CPTED/Safety principles of the amendments (**Appendix F**)

As shown in **Figure 7** below, the location of the stairs have been shifted north, and planting to the link redefined surrounding the stair. The aim of the modification in response to the submission is to maximise the trafficable area, public art, and provisions of street furniture in this area.

As require by the Concept plan, areas have been allocated for the provision of public art, which includes potential for a water feature wall. The final design and details of public art will be prepared in accordance with the Public Art Policy



Figure 7 – Revised Public Domain Plan

The location of the lobby, main building entry fronting onto the pedestrian link at the northern elevation of Block 4S as well as communal areas on the ground floor will ensure continuous passive surveillance throughout all hours of the day and evening. Furthermore, Block 4N includes active retail uses at the ground floor adjacent to the pedestrian link which will further contribute to surveillance.

Again it should be noted that this publically accessible area is mid block with no obvious linkage across Abercrombie Street. The current proposed connection is no less effective, safe and with the removal of the bridge link a lot more pleasant and more likely to sustain adequate landscaping opportunities.

The comments received from Elton Consulting (see **Appendix F**) in response to the redesign areas of public domain are provided below:

- *The "through link" will generate pedestrian activity as it is the main entrance to the proposed Block 4S student accommodation facility. It is also acts as a pedestrian walkway across the Central Park from east to west.*
- *The "through link" incorporates lighting and landscape elements that will make the area amenable, attractive and encourage people to sit and enjoy the surroundings, such as feature lighting, tree plantings, seating, a water feature and bike racks.*
- *Activity generating uses are located at the ground floor level on both Block 4S and Block 4N frontages of the "through link", including retail, cafe and the student accommodation lobby / entry, which will each encourage people to*

visit, walk-through but importantly stay in the area and provide passive surveillance opportunities.

- *Awnings / overhead cover is provided along part of all four frontages of the student accommodation building, which contributes to making this an all-weather, pedestrian-friendly environment with the potential for outdoor seating associated with cafe and restaurant uses. These awnings also provide an element of privacy to student dwellings above.*
- *A 24 hour on-site security / operator presence in the student accommodation facility will provide an additional element of safety. Surveillance will be supplemented with CCTV cameras.*

Ground Floor Activation

The previously located temporary loading dock at the southern elevation of the site has been removed. The ground floor of this elevation has been replaced with retail tenancies as shown on the revised architectural plans at **Appendix A** and **Figure 8**.

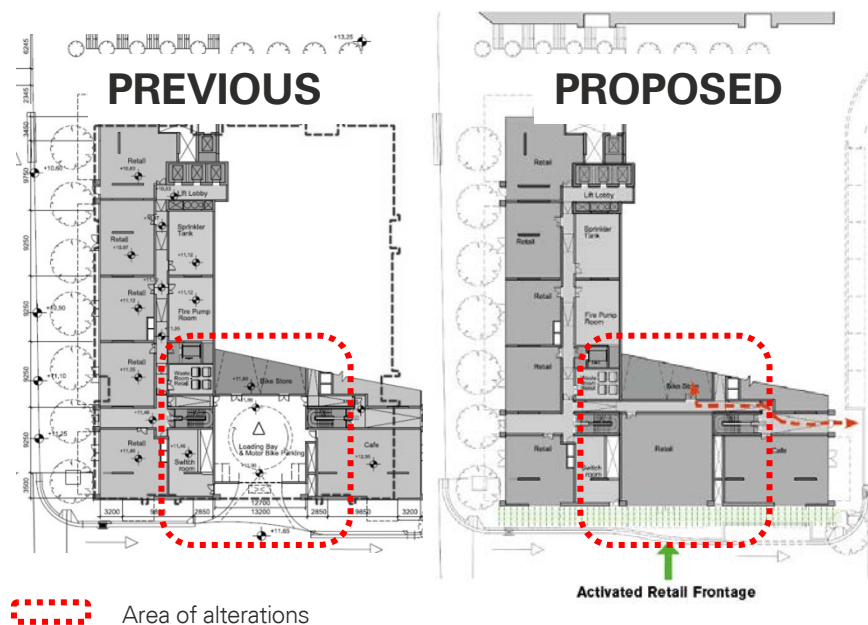


Figure 8 – Irving Street Activation with retail.

The addition of retail to the southern facade results in a far greater level activation to Irving Street and the entry to Central Park from Abercrombie Street, and increase in non residential by some 200sqm. The design allows for retail tenancies to be located on the corner and are afforded dual street frontage. Awnings have also been added to the southern elevation, providing weather pedestrians to pedestrians entering and exiting the site. Giving the sites location opposite the public park, the southern elevation is envisaged to be a highly used pedestrian thoroughfare with pedestrians accessing the public park from Abercrombie Street and areas further west.

In addition, the change in the design reduces the number of truck/service vehicles at this intersection, and the potential amenity and noise impacts associated with the loading/service area use.

As part of the southern facade amendments, the access to the bicycle parking that was available from Irving Street has been relocated to Central Park Avenue (as shown on the revised plans and accompanying diagrams at **Appendix A + B**) and below in **Figure 9**. In response to the redesign of the southern elevation, the waste arrangement has also been relocated to be accessible.

This arrangement was discussed with City of Sydney Council, and given the collection will be undertaken by a commercial operator from Central Park Avenue, the City raised no objection to this arrangement. The room has been design with adequate capacity to service the various uses within the development

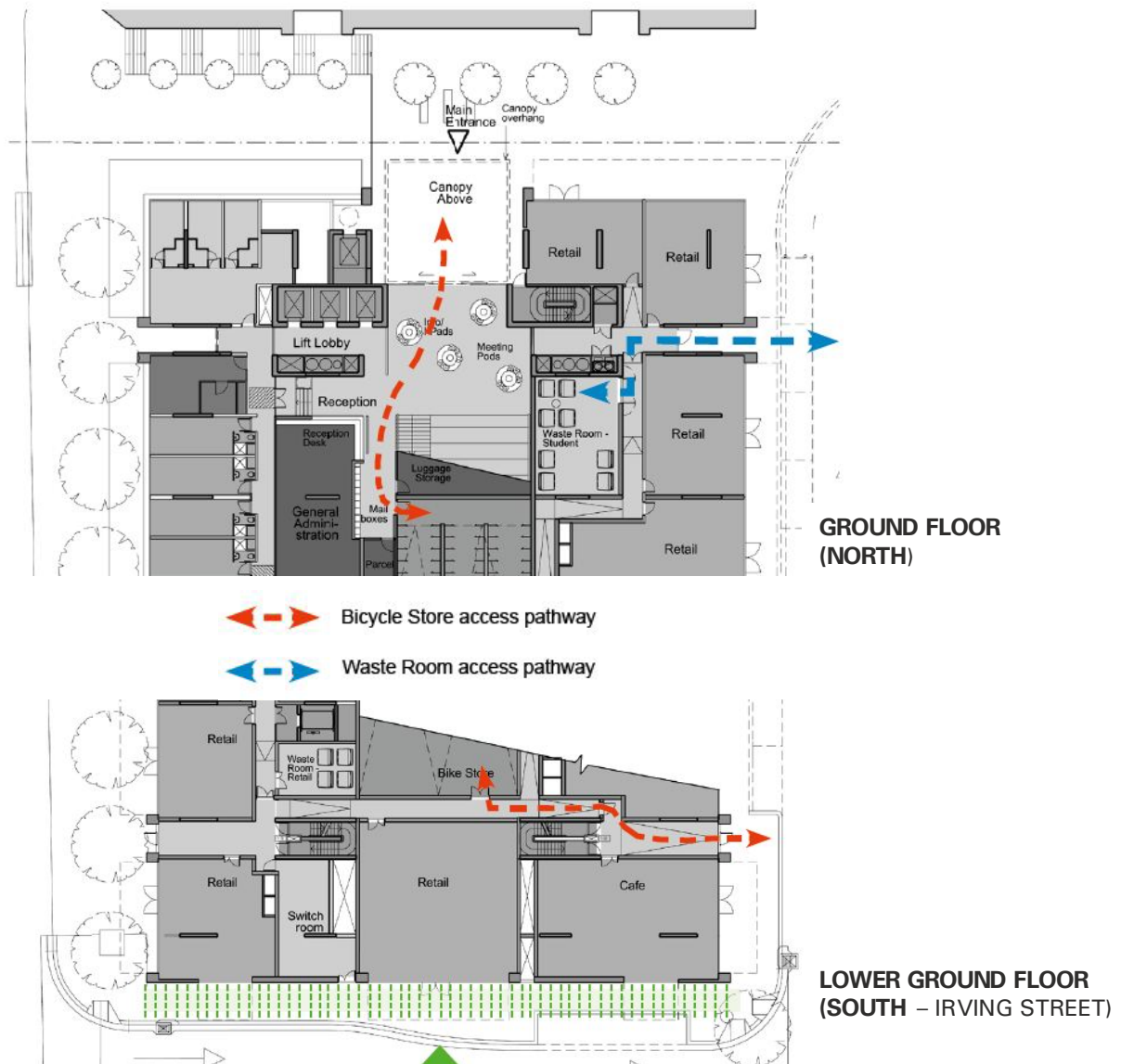


Figure 9 – Bicycle and Waste Room access arrangements

2.5 Density

2.5.1 Public Submissions

Issue

The DPI have requested the proponent consider the submission made by the Chippendale Residents Interest Group in relation to the resulting increase in residential density as a result of the proposal. The DPI have requested this is to include an assessment of the potential impacts of additional residential development and in particular, the increased student population would have on the Central Park site and the wider community in terms of (but not limited to) adequacy of existing services, community facilities, public open space. This assessment should take into consideration the cumulative impacts of recently approved student accommodation on the Central Park site and existing and approved student accommodation within the surrounding area. Details of any proposed measures to mitigate negative impacts should be included.

Proponent Response

Response to the public submissions has been provided, addressed by issue in the table attached to this additional information letter (**Appendix A**). Each of the submission relevant to the proposal has been categories by the item/issue and the cumulative impacts considered.

Proposed development has been designed in accordance with the guiding principles of the City of Sydney DCP and the Concept Plan, specifically with regard to services within the development to cater for the proposed student population. This includes areas of internal communal open space, as well as areas of external open space on the site.

It is noted that the future residents will be provided with high level of on-site services in addition to that which would ordinarily be provided within a residential flat building. This includes the provisions of break out area, music rooms, gym, study rooms, and areas of communal and cooking and passive recreation areas throughout the building.

The provision of internal and external communal open space within the development is appropriate to cater for the future student population. It is noted that the total number of students 826 is in lieu of approximately 1800 office workers that would have otherwise occupied the site.

Whilst it is noted that the proposed population will be permanent residents (different to office workers) the nature of student population and timetables means that the public open space within Central Park will be used at various times throughout the day rather than at peak periods. In addition there are numerous areas of public open space in the vicinity of the site and on campuses (including the future alumni green at UTS and Ultimo Pedestrian Network).

Finally, it is noted that student accommodation population will have minimal impact on the demand for childcare and parking facilities that would otherwise be generated on the site by office workers or other forms of residential accommodation.

2.6 Additional Information

In addition to the issues raised above, the Department has requested the following additional information, confirmation, and clarification

1. Confirmation is requested as to the proposed 'future truck access' between the basements to buildings on Blocks 4N & 4, in terms of the reason for and function of the link and the expected timing of construction of the link.
2. Clarification is requested as to the proposal's association with the NRAS, given the requirements of the scheme to provide 'affordable' accommodation.
3. Confirmation is requested as to the proposed provision of washing and drying machines, with specific reference to the requirements of the Sydney DCP 2012.
4. Confirmation of proposed floor to ceiling heights within the habitable and non-habitable parts of the development, including bedrooms, bathrooms and kitchen areas.
5. Confirmation is requested as to how the dedicated accessible units will be prioritised for those requiring the specific unit type.

Proponent Response

The proponent's response to the request for additional information is outlined in **Table 1**, below. A discussion on items 3 – laundry Facilities is provided below.

Laundry Facilities

The Frasers Block 4S Project as designed offers 28 Washers and 28 Dryers Stacked. This is a ratio of 1 Dryer and 1 Washer per 29.5 Beds (Based on 826 Total Development Beds). It is acknowledged that whilst this does not comply the guide set out in the City of Sydney DCP 2012 (1 machine per 6 residents) the provision is in line with accepted operator bench marks below. Detailed review subject to washing machine capacities however we attach a bench model that has 9kg capacity for comparison. Total capacity on this basis is 252kg (9kg x 28 washers).

Correspondence from Unilodge (specialist student housing provider) is attached at **Appendix I**. As outlined in the attached, Unilodge survey their residents bi-annually and as part of these surveys there has been no negative feedback in relation to the availability and access to washers and dryers. The ratio across the UniLodge portfolio is an average of 1:40 (projects less than 500 beds) and 1:50 (projects greater than 500 beds).

Furthermore, the UTS student housing development on Harris Street has a total of some 720 rooms and provides approximately 16 washing machines and a similar number of dryers. This equates to a ratio of 1:45, with no complaints from students/operator.

With regard to the commercial arrangement and operation of these facilities; the machines are leased to the student housing provider by an external provider, who install and service the machines at no cost to student housing provider. Importantly, provider does not purchase the machines and understandably the commercial laundry operator (Commercial Laundry Appliances) is only prepared to provide machines justified by utilisation. CLA manage and operate over 1,000 machines and assesses the appropriate provision rate for student accommodation projects of the subject scale at 1 machine/dryer set per 50 students. The consideration of the commercial viability and arrangement is an important consideration when considering the wording of the condition.

Given the information and clear data provided by Unilodge, CLA and other operational student accommodation facilities, the number and size of machines have been proposed to sufficiently cater to the needs of future students. The location, adjacent communal area and reception lobby will encourage interaction and allow for centralised maintenance and servicing consistent with CPTED consideration and on-site management.

Table 1 – Response to Additional Information Requested

Item	Response	Location
1	The reason for the future link between Block 4N and 4S is to minimise truck, serving and vehicle movement on the site. In seeking to minimise vehicle and truck movement within the site, pedestrian movements are encouraged. The connection will occur once Block 4N basement is complete.	
2	The National Rental Affordability Scheme (NRAS) is a joint Federal and State Government initiative to invest in and increase the supply of new affordable rental housing and encourage large-scale investment and innovative delivery. The proposal provides discounted rents to means-tested tenants qualifying as a form of affordable housing. The proposed development meets the relevant criteria and guidelines of the scheme and has been awarded the NRAS grant. A copy of the Successful NRAS Offer is provided at Appendix J	Appendix
3	The Frasers Block 4S Project as designed offers 28 Washers and 28 Dryers Stacked. This is a ratio of 1 Dryer and 1 Washer per 29.5 Beds (Based on 826 Total Development Beds). This is in line with accepted operator bench marks as outlined below. Detailed review subject to washing machine capacities however we attach a bench model that has 9kg capacity for comparison. Total capacity on this basis is 252kg (9kg x 28 washers). The number and location of washers and dryers is shown on the revised architectural plans (Appendix A). This is also supported by a correspondence from Unilodge at Appendix I . Refer to discussion above.	Appendix A and Appendix I
4	Bedroom/lounge and living areas will all have a minimum ceiling height of 2.7m. Bathrooms and corridors/ entry to the units will have a 2.4m ceiling height. These dimensions are shown on the revised architectural plans at Appendix A . Common areas will for the most part be 2.7m in height.	Appendix A
5	The revised preliminary Plan of Management includes details relating to the provision of accessible units for residents who require this unit type, in precedence to potential residents that may seek a larger room.	Appendix E

3.0 Preferred Project

In response to the submissions received, a minor amendment has been made to the proposed development. The following section outlines the scope of development for which approval is sought, based on the revised Architectural Drawings prepared by Foster + Partners and Nettleton Tribe (refer to **Appendix B**).

3.1 Changes to the Proposal

To address the key items raised in the submissions in the submissions the following amendments are proposed to the development:

- The Northern elevation of Block 4S has been reviewed to remove the reliance on privacy glass with the introduction of internal adjustable vertical metal louvers (See **Section 2.1** above).
- Additional justification regarding East and West Building articulation has ;
- Plan PA-A-5032 – this plan has been amended to add additional parking bays to the western side of Central Park Avenue and to Irving Street, in accordance with the proposed Concept Plan amendment.
- PA-A-5759 has been amended to replace the proposed loading bay replaced with retail/commercial tenancies
- PA-A-5760 has been amended to show bike store access altered from Irving street to Central Park Avenue;
- Elevation PA-A-6053 and Section PA-A-6250 has been amended to show retail and awnings on Irving street;
- Typical Apartment layouts PA-A-6700, PA-A-6701, PA-A-6702, added basic dimensions, areas and drawing scale.

3.1.1 Waste

In response to alterations of the southern facade to Irving Street (removing the loading dock and including active retail), waste arrangement within the building have been revised. As shown on the diagrams at **Appendix B** and in **Figure 9** above, the waste room has been relocated to the eastern side of Block 4S adjacent the lift core and access from Central park Avenue.

In consideration of the proposed relocation, discussion with City of Sydney's waste management team took place. No objection was raised given the proposal will be serviced by a commercial waste contractor.

3.1.2 Subdivision

In response to the excision of Block 4S from Blocks 1 and 4N (subject to a separate modification application), amendments are sought to the approved plan of subdivision. Block 1 and 4 is proposed to be subdivided into three lots, comprising:

- Blocks 1 and 4N;
- Block 4S; and
- the Central Thermal Plant and associated infrastructure in Block 4S.

These changes will enable the excision of Block 4S, should Frasers be required to subdivide the site to finance the project. Approval for the final subdivision plans will form part of a future, separate application to the Department. The draft Plan of subdivision is provided at **Appendix G**.

3.1.3 ESD Approach

A memo has been prepared by WSP Built Ecology to provide additional clarification on the ESD initiatives include in Block 4S, considering the minor amendments to the design.

As discussed in the EIS, as the building is class 3, a BASIX certificate cannot be issued for the proposed use. For the proposal as a class 3 building, compliance with section J of the National Construction Code (BCA) applies. The revised design demonstrated compliance with the Section J and the BASIX online assessment tool

With regard to natural ventilation, as indicated in the diagrams at **Appendix K**, the proposed multi-bed rooms provide ventilation openings on either side of the apartments, as well as windows being located on both sides of the bridge links to provide adequate cross flow ventilation.

3.2 Description of Proposal

The proposal comprises of fourteen (14) storeys and includes residential accommodation for 826 students, a variety of communal recreation, dining and study facilities, rooftop terraces, administration facilities, ground floor retail and a basement Central Park precinct-wide central thermal plant tri-generation plant comprising:

- A total of 826 beds within 688 rooms comprising of:
 - 167 beds within multi-share rooms (of between 3-6 beds)
 - A mix of studio types:
 - 329 Studio “Standard”
 - 301 Studio “Long”
 - 29 Studio Accessible/Deluxe
- Total GFA of 23,813m²
- 901m² of non-residential floor space located on the ground and lower ground floors with active frontages;
- Modifications to the existing approved basements to allow for loading and unloading from the southern elevation on Irving Street;
- Internal spaces for students including theatre, gym, laundry and lounge areas to level 00, 01, and level 13 as well as a lounge area within the northern link on every 2 levels from 3 and above; and
- External courtyard to level 3 and two terraces to level 13 resulting in an external areas of 500m².