



## Block 8, Central Park – Response to Submissions

### City of Sydney (CoS)

Issues Raised by CoS		Proponent's Response
Item No.		
1.	<b>Relocation of Gross Floor Area</b> <ul style="list-style-type: none"><li>The proposed modification to the Concept Plan seeks to transfer 2,850m<sup>2</sup> of GFA from Blocks 1 and 4S to Block 8. The proposal will result in a total GFA of 14,360m<sup>2</sup> for Block 8 and no change to the maximum permitted GFA (255,500m<sup>2</sup>) for the whole development site.</li><li>The City raises no objection, in principle, to the reallocation of GFA between blocks in Central Park where there is no change to the total GFA across the development site. However, the City urges Planning &amp; Infrastructure to ensure that incremental modifications to the allocation of GFA across the development site are not supported where it will result in any change to the approved land use mix comprising a minimum 59,515m<sup>2</sup> for non-residential uses and a maximum 195,985m<sup>2</sup> for residential uses.</li><li>The City notes that the concurrently submitted SSD application for Block 8 seeks a GFA of 14,303m<sup>2</sup> consisting of 14,168m<sup>2</sup> residential uses and 135m<sup>2</sup> non-residential uses. Clarification relating to should be sought to determine the total GFA being relocated to Block 8.</li></ul>	<p>In response to the issues raised in the submissions received amendments have been made to the proposed development. Accordingly, the GFA of Block 8 is now 14,875m<sup>2</sup> (see <b>Appendix B</b>). In particular, the loggias on the western façade and ground floor have been included in the total GFA.</p> <p>Notwithstanding the above, the issue of GFA primarily pertains to Concept Plan Mod 9. Accordingly, it is discussed in the separate Concept Plan Mod 9 RTS.</p>
2.	<b>Relocation of Vehicular Crossing for Block 1</b>	This issue does not pertain to Block 8. Accordingly, it is discussed in the separate Concept Plan Mod 9 RTS.
3.	<b>Built Form</b> <ul style="list-style-type: none"><li>The City acknowledges the slot on the southern elevation of Block 8 was originally approved to enable 14,500m<sup>2</sup> of GFA to be achieved whilst maintaining an efficient floor plate.</li><li>As part of the design competition process, architects were instructed that the slot can be retained, deleted or infilled as there are no significant shadow impacts on surrounding properties or the public domain. The proposal has demonstrated that the reduction in the width of the slot is generally consistent with the parameters of the</li></ul>	<p>Analysis of the reintroduction of the slot has been undertaken and the resulting proposal is shown below. It is noted that while the slot reduces the depth of the single aspect apartments, the result is that:</p> <ul style="list-style-type: none"><li>The external ground floor area would be directly south facing and contained by 8 storey high walls to south, east and west, and would have no opportunity for solar access;</li><li>The remanent space would predominantly exist in permanent shadow;</li><li>The slot would present as a rear frontage, which would be inappropriate to the quality of O'Connor Street, and as an entry to Chippendale Green at the heart of Central Park;</li><li>The deep and relative narrow recess would inhibit connectivity to the street, with poor view lines from the isolated apartment</li></ul>

design competition process.

- Whilst the City does not raise any objection to the proposed building envelope, concern is raised that the excessive depths of single aspect studio apartments is a result of an inefficient floor plate.

which would be set back some 10.5m from the street frontage; and

- The slot would have access to limited natural surveillance from street activity, and would be potentially subject to undesirable use of the space, such as the dumping of rubbish.

Overall, it is considered that the type of open space provided is a poor urban outcome and that provision of apartments is the preferred option.

See Section 2.1.2 of the Response to Submissions Report.

See Appendix A.



4.

#### Internal Amenity

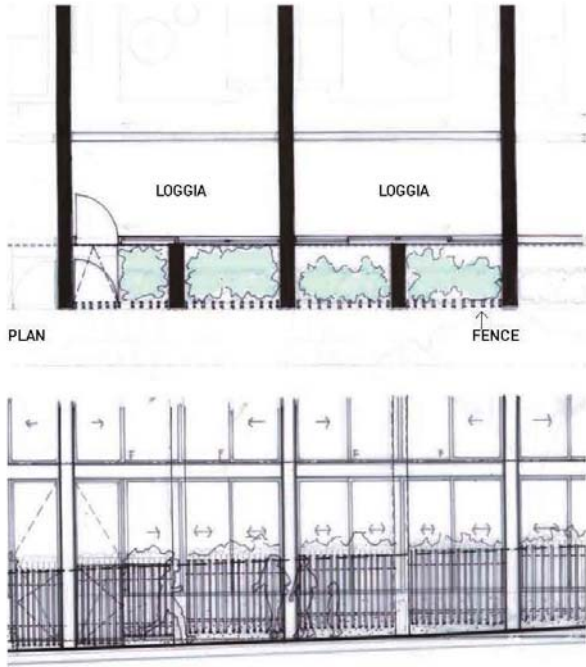
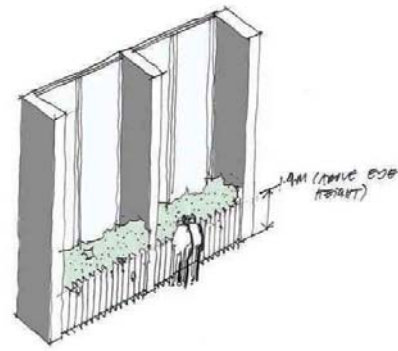
- The proposal includes single aspect studio apartments that range between 10.8m and 13.4m in depth. The proposed units are considered excessive in depth and do not comply with the maximum 8 metre depth for single aspect studio apartments as recommended in the Residential Flat Design Code (RFDC).
- The City acknowledges that borrowing amenity for the bedroom area of a studio from an adjoining living area is capable of satisfying minimum standards for natural light and ventilation under the Building Code of Australia. However, the City does not consider the reliance on borrowed amenity as best practice or quality design for internal residential amenity.
- The City believes that internal configuration of apartments and residential amenity can be enhanced if the depths of single aspect apartments are reduced to comply with the

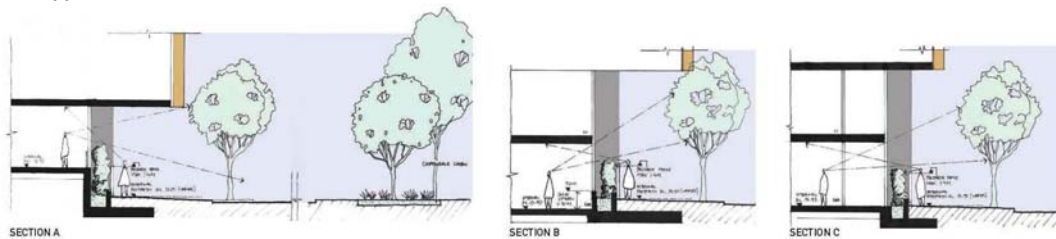
See Sections 2.1.1 – 2.1.3 of Response to Submissions Report.

	RFDC.	
5.	<b>Enclosure of Loggias</b> <ul style="list-style-type: none"> <li>▪ The City is supportive, in principle, of loggias to the apartments in Block 8. However, the detailed design of glazing on the external facade the loggias is not clearly shown and it cannot be established whether the loggias are capable of being fully enclosed.</li> <li>▪ The City believes that a loggia is considered to be open space and therefore not included in GFA calculations, if it does not have a balustrade of more than 1.2m in height and maintains a minimum 25% open area above the balustrade.</li> <li>▪ If the proposed loggias do not satisfy the above design requirements, the City recommends that the loggias must be included in the calculation of total GFA.</li> </ul>	See <b>Section 2.1.3</b> of Response to Submissions Report.
6.	<b>Acoustic Privacy</b> <ul style="list-style-type: none"> <li>▪ Private open space/loggias to apartments located on the north-western corner of the building on Levels 8 to 11 (inclusive) are adjacent to the bedroom of the apartments located immediately to the east. The potential transfer of noise from use of private open space of one apartment to the quieter uses (i.e. bedroom) of an adjacent apartment is inconsistent with the acoustic privacy objectives in the RFDC and will likely result in unreasonable amenity impacts.</li> <li>▪ The City recommends that the applicant be required to amend the layout of apartments to address this issue.</li> </ul>	The layout of the apartments, specifically the bedroom and balcony configuration, has been amended to mitigate the potential transfer of noise (see <b>Appendix A</b> ). In particular, acoustic privacy between apartments is optimised by locating the same functions adjacent to each other. In situations where a living room / kitchen window is adjacent to a bedroom window of a neighbouring apartment, a fixed window is provided to the living room / kitchen with natural ventilation provided by the expanse of operable floor to ceiling doors to the main facade.
7.	<b>Interface between Private and Public Domains</b> <ul style="list-style-type: none"> <li>▪ The City appreciates the need to balance privacy for future occupants located on the ground level and providing passive surveillance to the adjacent public domain along Central Park Avenue and O'Connor Street.</li> <li>▪ The proposed palisade fences with landscape planters separating ground floor apartments from passing pedestrian traffic on Central Park Avenue and O'Connor Street is supported, subject to modification to fence details. In particular, the fences should not exceed a maximum height of 1.4m and adequate separation between the palisade blades is to ensure a minimum 50% of the area of the fence is transparent.</li> <li>▪ The landscaped planters are situated behind the palisade fences and do not appear to be easily accessible from the adjoining apartments. The City recommends the preparation of a plan of management for landscape maintenance to be adopted and implemented by the Owners Corporation.</li> <li>▪ Privacy issues may also be further mitigated between the ground level apartments and the public domain if the extent of floor to ceiling glazing fronting Central Park Avenue and O'Connor Street is reduced to a maximum 50% glass to wall ratio. The introduction of fanlights or louvered windows should also be considered to provide natural ventilation and climate control options for occupants.</li> </ul>	The interface between private and public domains is addressed by the design of the glass to wall treatment as shown at Recommended Condition 3 below.
8.	<b>Communal Open Space</b> <ul style="list-style-type: none"> <li>▪ The proposal provides an area of communal open space equivalent to approximately 9% of the total site area of Block 8. This is insufficient and does not achieve the</li> </ul>	See <b>Section 2.1.3</b> of Response to Submissions Report.

	<p>recommended 25-30% communal open space area under the RFDC.</p> <ul style="list-style-type: none"> <li>Chippendale Green is in close proximity to Block 8 and is a valuable public open space for the local community. The City is aware that there are ongoing pressures for Chippendale Green to accommodate various uses by different groups in the community. Therefore it is important that the proposed development does not increase pressure on the availability of Chippendale Green for recreational use by residents that can otherwise be accommodated within the development.</li> </ul>	
9.	<p><b>Natural Light and Ventilation to Common Corridors and Lobbies</b></p> <ul style="list-style-type: none"> <li>The City strongly supports ecologically sustainable design and principles that enhances the lifecycle of a building.</li> <li>The City is supportive of the proposal to provide natural light and ventilation to common area corridors and lobbies on each level of the development.</li> <li>It is noted that the common corridors on Levels 8 to 11 (inclusive) do not maximise opportunities to provide natural light and ventilation to common corridors, as proposed on the lower levels of the development. The City strongly recommends that amendments to the configuration of apartments on Levels 8 to 11 be reconsidered to enable additional window openings to the common corridors to enhance natural light and ventilation.</li> </ul>	See Section 2.1.1 of Response to Submissions Report.
10.	<p><b>Street Trees</b></p> <ul style="list-style-type: none"> <li>The proposed overhang of the north-eastern portion of the building (from Levels 1 to 9) above the proposed footway near the intersection of Central Park Avenue and Irving Street has no setback to the proposed planter and street tree.</li> <li>The building overhang in this location will affect the natural growth and spread of the tree canopy. Given that the canopy will be growing adjacent to private loggias, it is likely that substantial pruning will occur in the future and adversely affect the aesthetic quality of the street tree.</li> <li>As the City generally supports the proposed building envelope and form of Block 8, the City advises that the proposed street tree located on Central Park Avenue, near the intersection of Irving Street can be deleted.</li> </ul>	Noted
11.	<p><b>Easement Boundaries</b></p> <ul style="list-style-type: none"> <li>The City notes that the footways along Irving Street, O'Connor Street and Central Park Avenue are located wholly within the boundaries of Block 8.</li> <li>Notwithstanding the easement boundaries denoted on the proposed ground floor drawings, the City is of the opinion that easements on the footway should extend the full width of the footway to ensure public access and use by pedestrians is maintained at all times.</li> </ul>	The easements have now been amended (see <b>Appendix A</b> ). However, for reasons of safety and security those areas in front of the main entry and fire doors remain as private land within the boundaries of Block 8, specifically to exclude those people who are not residents from using these areas.
12.	<p><b>Traffic and Parking for Block 8</b></p> <ul style="list-style-type: none"> <li>The City raises no concerns relating to traffic generation and parking with the proposed 3 level basement car park in Block 8. The proposed 88 residential car spaces, 251 bicycle parking spaces, end-of-journey facilities and storage facilities is</li> </ul>	The number of off-street car parking spaces has been amended and is now 103, and there is no visitor parking (see <b>Appendix A</b> ). The six off-street car share spaces have now been relocated to the east basement to consolidate the location of car share vehicles on the Central Park site. The location is within easy walking distance of Block 8. One on-street car share space remains.

	supported, subject to recommended conditions attached.	
13.	<p><b>CPTED Report</b></p> <ul style="list-style-type: none"> <li>▪ The CPTED Report prepared by Elton Consulting dated 17 December 2013 provides insufficient information and is not supported in its current format. In particular, the report lacks details relating to mitigating crime through the overall design, demonstrating recent consultation with Redfern Police Local Area Command, clarification on use of CCTV particularly at the entrance to the basement car park.</li> <li>▪ It is recommended that a revised report addressing the issues outlined above be prepared and submitted to the satisfaction of Council.</li> </ul>	<p>The CPTED Report prepared for the initial concept plan outlined a broad framework for the assessment of all subsequent blocks at Central Park. Accordingly, all subsequent project applications for individual development blocks have been accompanied by a detailed Safety Management Strategy / Plan, which addresses the principles and objectives of CPTED at Central Park as applies to the proposal. The key principles against which all applications have been assessed include:</p> <ul style="list-style-type: none"> <li>▪ Create a secure public domain for all users at all times;</li> <li>▪ Create a secure and easily accessed pedestrian and transport network;</li> <li>▪ Create a secure environment during the construction process;</li> <li>▪ Address the crime prevention needs of special user groups;</li> <li>▪ Contribute to the creation of a secure community for residents in and around the site;</li> <li>▪ Promote health and injury prevention;</li> <li>▪ Promote and support crime prevention through formal surveillance and appropriate signage; and</li> <li>▪ Create a secure and well-maintained built environment.</li> </ul> <p>The proponent and Elton Consulting met with two Crime Prevention Officer's from the Redfern Local Area Command (LAC) to discuss the proposed development, and in particular the recommendations of Elton Consulting's report, Crime Prevention and Community Safety Management Strategy (17 December 2013). The outcome of this consultation is contained in the updated report provided at <b>Appendix F</b>. In summary, the Redfern LAC provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Street level apartments – <ul style="list-style-type: none"> <li>– limiting unauthorised access to ground floor apartments through the provision of a 1.4m high fence, robust materials used in the wall to the loggias on the ground floor, and robust and durable fixtures used to the doors that provide access to the apartments (it is noted that four ground floor apartments have direct access to the public domain, in addition to internal access via the lobby).</li> </ul> </li> <li>▪ Communal areas – <ul style="list-style-type: none"> <li>– ensuring swipe / key card access to communal areas and time restrictions (e.g. controlled access after 10pm) to be managed by a facilities manager.</li> </ul> </li> <li>▪ Placement of CCTV cameras – <ul style="list-style-type: none"> <li>– CCTV cameras will be provided at the ground floor to ensure coverage of the main entry lobby, the external intercom, and the main common areas. Cameras will also be provided to all lift lobby areas, as well as those areas where there are large amounts of storage such as the loading dock and garbage rooms.</li> <li>– CCTV cameras will also be provided inside and outside of the main roller shutters to the car park entry and garbage areas, which by their proximity will record activity on Irving Street. The indicative location of the CCTV cameras is shown in the updated CPTED Report (see <b>Appendix F</b>).</li> <li>– It was noted that high quality CCTV cameras will be provided and this will be supplemented by good lighting to ensure footage captured is clear.</li> </ul> </li> <li>▪ Access to garbage room / loading dock – <ul style="list-style-type: none"> <li>– A roller shutter is provided at the entrance to the loading dock / garbage room off Irving Street. A swipe / key card will be used to gain access to the garbage room which is located directly off the loading bay. The site facilities manager will have access. Residents will have access to a waste room with refuse chute on each residential level, and therefore will not need access to the garbage room on the ground floor.</li> </ul> </li> <li>▪ Facilities manager –</li> </ul>

		<p>– The Redfern LAC would prefer that the same security company be used for all blocks within Central Park. This is noted in the updated CPTED Report (see <b>Appendix F</b>), however this is an issue for the eventual owners of the building. Subsequent correspondence from the Police Officers confirms that the Redfern LAC is satisfied that all matters relevant to CPTED have been addressed as part of this application. The CPTED Report has been revised and is provided at <b>Appendix F</b>.</p>
Item No.	Recommended Conditions While there is general agreement with the suggested conditions, the proponent seeks the opportunity to present proposed amendments to P&E prior to finalisation of the conditions of consent for the proposed development	
1.	Loggias	See <b>Section 2.1.3</b> of Response to Submissions Report.
2.	Palisade Fence Design	<p>The design of the fence is shown below. See <b>Appendix A</b>.</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <p>TYPICAL STREET FENCING GLAZING TREATMENT</p> </div> <div style="text-align: center;">  <p>TYPICAL STREET FENCING &amp; LANDSCAPE TREATMENT</p> </div> </div>

3.	Glass to Wall Treatment to Ground Floor Apartments	<p>The design of the glass to wall treatment is shown below. See <b>Appendix A</b>.</p> 
4.	Plan of Management for Landscape Maintenance	Noted
5.	Safety Management Plan	See Item 13 above and the updated CPTED Report provided at <b>Appendix F</b> .
6.	Street Tree Protection	Noted
7.	Allocation for Visitor Parking	Visitor parking has been deleted from the proposed development (see <b>Appendix A</b> ).
8.	Accessible Car Parking Spaces	The accessible car parking spaces, including shared zones, have been designed in accordance with AS 2890.6-2009. Confirmation of compliance will be provided prior to occupation.
9.	Associated Roadway Costs	Noted
10.	Bicycle Parking	Noted
11.	Car Parking Spaces and Dimensions	<p>The number of off-street car parking spaces has been amended and is now 103, and there is no visitor parking (see <b>Appendix A</b>). The six off-street car share spaces have now been relocated to the east basement to consolidate the location of car share vehicles on the Central Park site. The location is within easy walking distance of Block 8. One on-street car share space remains.</p> <p>The off-street parking facilities have been designed in accordance with the relevant Australian Standard and Council's DCP.</p>
12.	Changes to Kerb Side Parking Restrictions	Noted
13.	Cost of Signposting	Noted
14.	Intercom for Visitors	Noted
15.	Loading Within Site	Noted
16.	Loading/Parking Kept Clear	Noted
17.	Location of Accessible Car Parking Spaces	Noted
18.	Location of Visitor Parking	Visitor parking has been deleted from the proposed development (see <b>Appendix A</b> ).
19.	Security Gates	Noted
20.	Service Vehicles	Noted
21.	Signs at Egress	Noted
22.	Traffic Works	Noted
23.	Vehicle Footway Crossing	Noted

24.	Construction Traffic Management Plan	See <b>Section 2.1.5</b> of Response to Submissions Report and <b>Appendix C</b> .
25.	Alignment Levels	See <b>Section 2.2.2</b> of Response to Submissions Report.
26.	Public Domain Plan	Noted
27.	Public Domain Works – Hold Points and Handover	Noted
28.	Photographic Record / Dilapidation Report – Public Domain – Abercrombie & O'Connor Streets	Noted
29.	Stormwater and Drainage – Major Development	Central Park is provided with a site-wide on-site detention, treatment and re-use infrastructure system, which has been designed and constructed by others as part of the site early works and development of other blocks. Block 8 will connect to this infrastructure and details will be provided prior to the commencement of the works.
30.	Preservation of Survey Marks	Noted
31.	Paving Materials	Noted
32.	Protection of Stone Kerbs	Noted
33.	Hours of Work and Noise – Outside CBD	Noted
34.	Loading and Unloading During Construction	Noted
35.	Access Driveways to be Constructed	Noted
36.	No Obstructions of Public Way	Noted
37.	Use of Mobile Cranes	Noted
38.	Green Travel Plan	Noted
39.	Accessible Parking Space	Noted
40.	Car Share Spaces	The six off-street car share spaces have now been relocated to the east basement to consolidate the location of car share vehicles on the Central Park site. The location is within easy walking distance of Block 8. One on-street car share space remains (see <b>Appendix A</b> ).