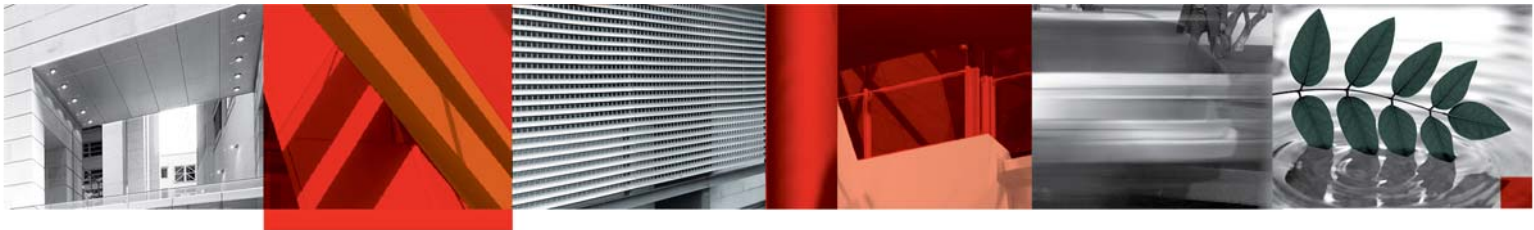


State Significant Development Application - SSD 6092 Response to Submissions



Block 8, Central Park

Mixed Use Development

Submitted to Department of Planning and Environment
On Behalf of Central Park JVNo 2

May 2014 ■ 13381

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This report has been prepared by:

A handwritten signature in black ink, appearing to be 'Emma Kirkman', with a stylized, somewhat jagged line for the surname.

Emma Kirkman

26/05/2014

This report has been reviewed by:

A handwritten signature in blue ink, appearing to be 'Gordon Kirkby', written in a cursive style.

Gordon Kirkby

26/05/2014

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1.0 Introduction

This Response to Submissions (RTS) is in relation to an Environmental Impact Statement (EIS) for a State Significant Development Application (SSDA) for a mixed use development known as Block 8 at Central Park, Chippendale. The application was publicly exhibited for a period of 4 weeks between 5 February 2014 and 7 March 2014.

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

A total of 5 submissions were received by the then Department of Planning and Infrastructure (DP&I) in response to the exhibition as follows:

- State authorities and agencies – 3;
- City of Sydney Council – 1; and
- Chippendale Residents Interest Group – 1.

However, the three agency submissions, one made by Ausgrid and two by Roads and Maritime Services, did not raise any objections to the proposed development. Rather, the submissions suggested comments for consideration by DP&I in its determination of the application, most of which are to be undertaken prior to the commencement of or during the works.

Section 2 of this RTS addresses the key issues as raised by DP&I, and Section 3 outlines the key changes made to the proposal as a result of the submissions received. An individual response to all issues raised is provided in the appended tables, and where required consultants' reports have also been revised and are appended to the RTS.

This RTS should be read in conjunction with the Block 8, Central Park EIS prepared by JBA and dated January 2014, as well as the following application which was submitted concurrently:

- Modification to the Approved Concept Plan (MP 06_0171 Mod 9).

It is also noted that a separate RTS has been prepared to address the submissions received in response to the exhibition of the Concept Plan Mod 9 (also exhibited between 5 February 2014 and 7 March 2014).

Due to the interrelationships between the applications, there is a level of overlap in the issues raised in the submissions. Accordingly, the applications and their respective RTS should be referred to when considering this response.

While there is general agreement with the suggested conditions within the submissions received, the proponent seeks the opportunity to present proposed amendments to the now Department of Planning and Environment (DP&E) prior to finalisation of the conditions of consent for the proposed development.

2.0 Key Issues and Proponent's Response

2.1 Internal Amenity

2.1.1 Cross Ventilation

Issue

DP&I requested consideration be given to the number of apartments identified as being provided with cross ventilation, and the reliance of the slots to provide access to cross ventilation. Modelling is to be provided demonstrating how ventilation adequately travels through apartments across different levels (i.e. on Levels 3 – 7 and Level 9). Details of how bedrooms that outlook into the slots are provided with natural ventilation is to be provided, and justification in relation to the width of the slots and the provision of windows is also to be provided.

Proponent Response

All apartments within Block 8 are naturally ventilated while 75.8% are cross ventilated, as shown in **Figure 1** below. This percentage exceeds the Residential Flat Design Code (RFDC) 'Rules of Thumb' which specifies that 60% of apartments should be cross ventilated.

Cross ventilation is achieved by way of the light and ventilation slots in the façade, which are either accessed by each apartment and/or external terraces, loggias and balconies. In addition, lobbies on all typical levels are now provided with awning windows at both the northern and southern ends, allowing these spaces to be naturally ventilated, supplemented with assisted mechanical ventilation. (Levels 9 – 11 are ventilated at the southern end only, and there are no windows to the level 12 lobby, however this is considered appropriate given the size of the lobby and the fact that it provides access to only two apartments).

The articulation of the façade, with slots, rebates and privacy fins, will significantly improve the natural ventilation potential through single and dual aspect apartments, due to the pressure differential generated on the various openings into the apartments.

It is noted that there are 44 apartments which because of their single aspect are not cross ventilated. However, all are provided with windows that open onto loggias, balconies and/or the external façade to ensure continuous air flow.

On the Abercrombie Street façade, natural ventilation transfer ducts are proposed from the facade into the body of the apartment, to act as a natural cross ventilation source when the loggia is closed.

Bedrooms

The slots in the façade are typically 1.8m wide, and the bedroom windows that open into them are no less than 880mm wide. These dimensions are considered appropriate and have been used in the review undertaken by Surface Design.

The windows comprise floor to ceiling sliding glass panels located on the main facades, and are provided with safety mechanisms to limit the extent of opening and comply with the relevant codes.



Figure 1 – Cross ventilation to apartments on a typical floor
 Source: Smart Design Studio

Cross ventilation to apartments is considered in the revised Design Report and Architectural Drawings prepared by Smart Design Studio and provided at **Appendix A**.

2.1.2 Single Aspect Units

Issue

DP&I requested consideration be given to the number of single aspect units within the development, particularly those with an outlook toward the south. In particular, justification in relation to the number of these apartments is to be provided.

Proponent Response

There are 44 apartments which are single aspect, 16 of which are south facing single aspect units. However, all are provided with amenity in the form of:

- Private open space;
- Loggias and/or balconies;
- Storage spaces within the apartment and in the basement;
- Natural and/or cross ventilation;
- Access to natural light and direct winter sunlight;
- Good visual connectivity to the street;
- Privacy; and
- Spatial planning which delivers generous bedroom and living areas.

Analysis of the number of single aspect, south facing apartments has been undertaken and a proposal to reduce this number, by combining two apartments into one, was prepared, as shown in **Figure 2** below. However, the proposal results in oversized units (a 2-bed apartment is between 118m² and 123.3m²), compared to 70m², the minimum required by the RFDC 'Rules of Thumb'), which does little to improve the amenity already afforded to the apartments separately, and results in a product that does not respond to market demands and therefore does not align with the demographics of Chippendale.

Instead, the effective depth of the single aspect apartments has been reduced on average to 10m, and south facing single aspect apartments have been reduced on average from 14.5m to 14m deep. The reduction improves amenity, particularly in relation to provision of light and ventilation to the rear of the apartments. This is also enhanced by the amended layout of these apartments where utilities including the bathroom and laundry are now located to the rear, affording bedroom and living spaces premium access to natural light, and generously sized bedrooms which now have additional area that can be used by the occupant as a walk-in-robe, attached study or additional storage.



Figure 2 – Proposal to combine two apartments into one
Source: Smart Design Studio

The amenity of single aspect units is considered in the revised Design Report and Architectural Drawings prepared by Smart Design Studio and provided at **Appendix A**.

2.1.3 SEPP 65 'Rules of Thumb'

Issue

DP&I requested consideration be given to the 'Rules of Thumb' as contained in the Residential Flat Design Code. In particular, justification is to be provided in relation to apartment depths, depth to back of kitchens, access to cross ventilation and suitability of the proposed open space areas (including clarification of the design of loggias, and location of open space to apartments on the ground floor).

SEPP 65 'Rules of Thumb' are detailed below and considered in the revised Design Report and Architectural Drawings prepared by Smart Design Studio and provided at **Appendix A**.

Proponent Response

Apartment Depth

In accordance with the RFDC 'Rules of Thumb' single aspect apartments should be no more than 8m from a window. While the single aspect apartments within Block 8 exceed this requirement, their depth has been reduced on average to 10m,

and south facing single aspect apartments have been reduced on average from 14.5m to 14m deep in consideration of the amenity of occupants. The apartment layouts have also been amended to deliver additional amenity including:

- Increased storage;
- Borrowed light;
- Increased bedroom area; and
- Walk in robe.

A typical single aspect apartment is shown in **Figure 3** below.

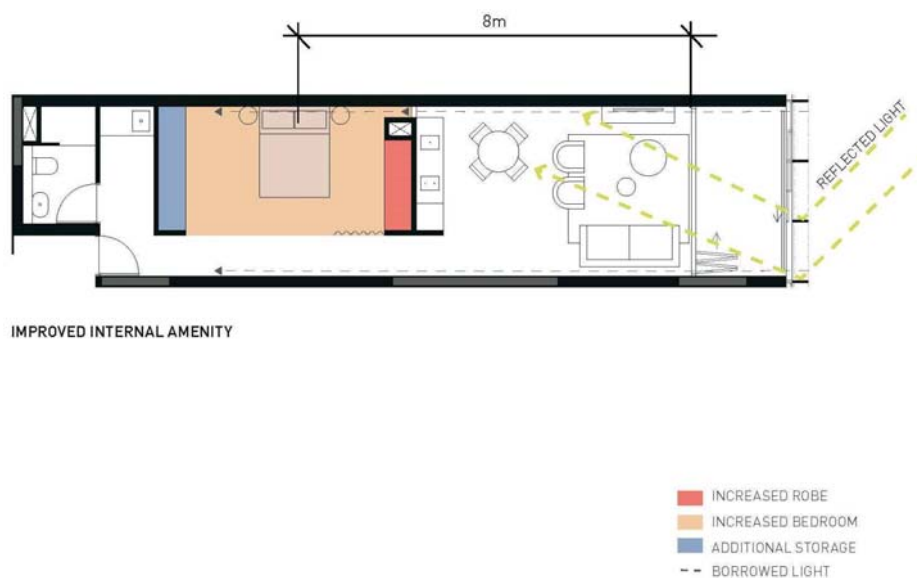


Figure 3 – Typical single aspect apartment
Source: Smart Design Studio

Depth to Kitchen

In accordance with the RFDC 'Rules of Thumb' the back of a kitchen should be no more than 8m from a window. Generally the apartments within Block 8 meet this requirement. Where the depth is exceeded the apartments are 2- or 3-bed, and it is considered that the overall size of the apartment ensures that the amount of light and ventilation that reaches the kitchen is adequate. It is also noted that the apartments that exceed the depth are cross ventilated thus improving amenity.

Cross Ventilation

Cross ventilation of apartments within Block 8 and compliance with the RFDC 'Rules of Thumb' is discussed in **Section 2.1.1** above.

Open Space

Chippendale Green is located to the east of Block 8, providing easily accessible public open space for use by residents. Chippendale Green provides the main park as envisaged in the site-wide Concept Plan. While it services the needs of the wider Chippendale community, its use is not exclusive, and this includes access by residents of Block 8 (and other residents of Central Park).

Within Block 8 itself the proposed communal open space comprises the roof-top terrace which is provided with jacuzzi and BBQ facilities and outdoor seating, is landscaped, has good year-round solar access, and has district views to the south, east and west. The terrace is set back from the street boundary alignments, which protects the privacy of surrounding neighbours. The terrace is some 5% of the site area. While this is short of the RFDC 'Rules of Thumb', which requires that

communal open space should generally be between 25% – 30% of the site area, the building is immediately adjacent Chippendale Green, which offers a wealth of open space.

In addition, Block 8 is provided with internal communal areas consisting of the entry lobby and residents' lounge at ground level. The entry lobby is accessed on the east side of the building off Central Park Avenue and is characterised by a three storey void with artwork, offering a potential location for social interaction. The residents' lounge adjoins the entry lobby and has a frontage to Abercrombie Street, improving amenity and outlook. A gymnasium is provided adjacent the residents' lounge, and overlooks Abercrombie Street. Residents will have exclusive use of the facility. The lobby, lounge and gym provide some 205m² of additional amenity for residents of Block 8.

The residential levels 1 – 11 of the building are generously proportioned to provide good quality entry spaces to apartments, and the circulation spaces, which have access to natural light, ventilation and vistas to the surrounding neighbourhood, further enhance the amenity of these common areas.

For ground floor apartments the RFDC 'Rules of Thumb' recommend a minimum area of private open space of 25m², and a minimum preferred dimension in one direction of 4m. While the ground floor apartments within Block 8 do not meet the recommended area, all have private open space which is 4m or more in width.

Loggias

Loggias and balconies are allocated to all apartments. These provide private open space and have a minimum depth of 2m, and a minimum width of 4m in accordance with the RFDC 'Rules of Thumb'. The loggias on the western façade and ground floor have been included in the total GFA as they are capable of being fully enclosed in order to ameliorate noise, particularly on the western façade which faces Abercrombie Street, and to provide acoustic privacy to occupants.

The loggias to apartments at ground level and levels 1 – 9 fronting Abercrombie Street provide:

- Private open space with floor to ceiling glazed sliding doors enabling the external space to be individually controlled for environmental comfort;
- Flexibility to fully shelter and weather proof the space from driving wind and rain;
- Screening for acoustic and visual privacy;
- Sliding doors with security devices allowing doors to be partially opened for natural ventilation while providing security;
- Balustrades placed internal to the glazed doors allowing the space to be fully opened up to take full advantage of favourable weather conditions;
- Extension of the living area for flexible living arrangements; and
- Expansive openings to take advantage of views and solar access.

The design condition of the loggias is shown in **Figure 4** below.

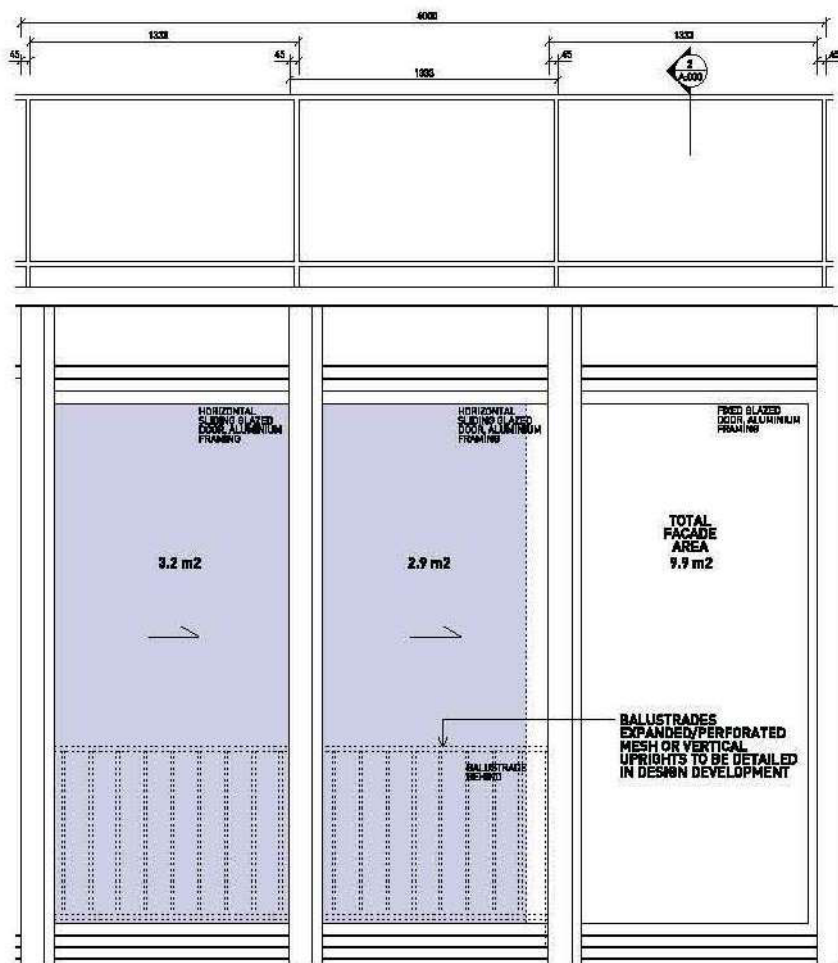


Figure 4 – Loggia, capable of being fully enclosed
Source: Smart Design Studio

The balconies to apartments at levels 1 – 12 are considered not to contribute to GFA given they are an external space providing:

- Private open space with typically two floating glazed screens extending from floor to ceiling to enable flexibility in control of the external environment;
- Screening of the space to manage driving wind and rain;
- Balustrades placed internal to the glazed screens, permitting the screens to be located at any point in the opening for maximum flexibility;
- External extension of the living area for various living arrangements; and
- Expansive openings to take advantage of views and solar access.

The design condition of the balconies, which have a minimum permanently open area of 34%, is shown in **Figure 5** below.

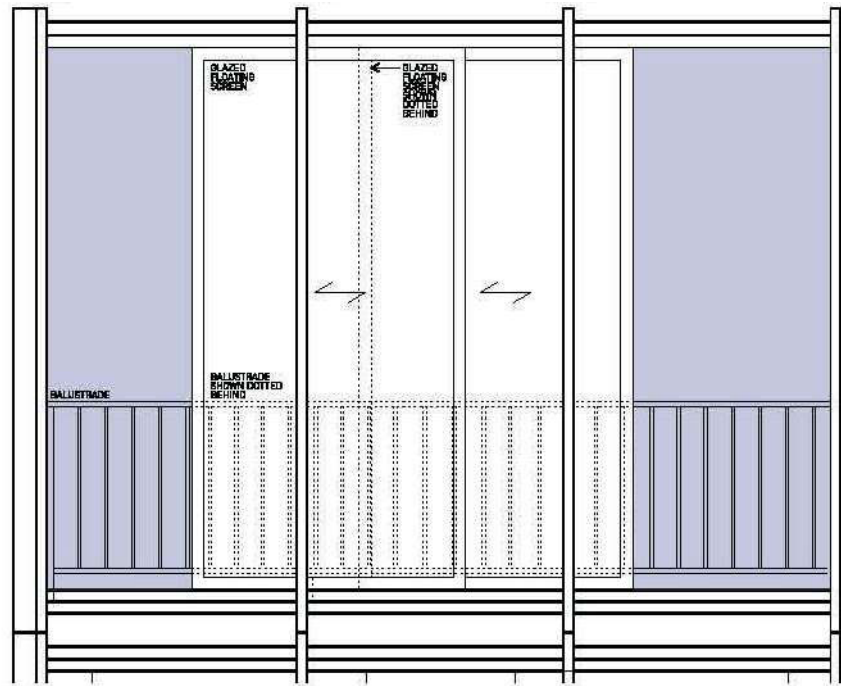


Figure 5 – Balcony, permanently openable area of 34%

Source: Smart Design Studio

In addition, the design of both the loggias and balconies includes an open metal balustrade or perforated mesh screen (to be determined as part of ongoing design development) to deter residents from using the space for storage.

2.1.4 Noise Attenuation

Issue

DP&I requested consideration be given to noise attenuation measures in response to the likely increase in traffic along Abercrombie Street as a result of the Sydney City Access Strategy (December 2013).

Proponent Response

The Noise Impact Assessment prepared by Acoustic Logic (December 2013) identified that traffic noise (particularly from Abercrombie Street) would be the most noise impacting activity to affect occupants of Block 8. Accordingly, the assessment recommended construction specifications to mitigate noise impacts, including glazing thickness and use of acoustic seals. The assessment concluded that subject to these specifications being implemented the noise intrusion from traffic on Abercrombie Street would comply with the relevant controls.

While traffic along Abercrombie Street is likely to increase as a result of its identification in the Sydney City Access Strategy as a future bypass route, it is considered that the noise attenuation measures noted above will ensure internal noise levels comply with the relevant controls.

It is also noted that in relation to acoustic privacy the loggias on the western façade provide an additional noise attenuation measure by acting as a buffer between Abercrombie Street and the internal living areas of the apartments. Given the loggias are capable of being fully enclosed they have been included in the total GFA (see **Section 2.1.3** above).

2.1.5 Cumulative Construction Impacts

Issue

DP&I requested consideration be given to the cumulative construction impacts likely to occur on the site during the construction of Block 8 (noting that construction of Block 8 is expected to take 19 months). In particular, additional consideration is to be given to the location of access and egress of cars and construction vehicles.

Proponent Response

The Construction Traffic Management Plan prepared by GTA Consultants (December 2013) identified the cumulative construction impacts likely to occur on the site, particularly in relation to Block 4S (to the north of Block 8). The construction staging and overlapping was detailed in the report, and determined an overlap of some 11 months.

Construction of Block 8 is expected to generate up to 6 vehicles per hour during the peak period, which equates to approximately one vehicle every 10 minutes. Similarly, Block 4S works would generate similar traffic flows. Therefore, the construction works relating to Block 4S and Block 8 would generate a total of 12 vehicles per hour during the peak period, and the resultant traffic flows would be relatively minor. (It is also noted that the expected construction traffic is significantly lower than the expected development traffic, which has been approved under the site-wide Concept Plan).

It is noted that Irving Street and Central Park Avenue, from O'Connor Street to Chippendale Way, are to be used by the construction sites as they are yet to be handed over to Council.

While it is acknowledged that to date construction of Central Park has resulted in some congestion and parking of trucks along Abercrombie Street, a number of traffic management measures are proposed including traffic control plans, driver protocols and maximum speed levels. Access and egress routes are also proposed, and trucks will be required to radio the site office on approach to ensure access is available thus negating the need to park / wait on Abercrombie Street. The safety of pedestrians / cyclists will be ensured by the traffic lights at Abercrombie and O'Connor Streets, which provide controlled crossings. Cars will follow similar travel routes, and parking will be provided on-site, notwithstanding that the site is well served by public transport and therefore the number of cars accessing the site is expected to be minimised. It is considered that provided the management measures are enforced surrounding residents will not be unduly impacted.

GTA Consultants has prepared a formal response in relation to cumulative construction impacts and this is provided at **Appendix C**.

2.2 Additional Information

In addition to the issues raised above, DP&E has requested that the following additional information be provided.

2.2.1 Wind and Reflectivity

Issue

DP&I requested consideration be given to the measures proposed to mitigate any wind or reflectivity impacts as detailed in the Wind Engineering and Solar Reflectivity Report prepared by Cermak Peterka Petersen. Confirmation is to be provided that these measures are those which will be implemented.

Proponent Response

The wind mitigation measures, which will be implemented in the final proposal, are detailed below:

- Evergreen trees along the streetscape; and
- Articulation of the western façade i.e. slots, rebates and privacy fins.

It is anticipated that these measures, in conjunction with awnings to Block 4S along Abercrombie Street, will minimise any wind impacts. As part of ongoing design development, further testing and detailed modelling of the wind conditions will be undertaken.

In relation to reflectivity, all façade elements will have a reflectivity index less than 20%, which will ensure there are no reflectivity impacts.

Implementation of the measures will be demonstrated to the satisfaction of the PCA prior to the commencement of the works.

2.2.2 Accessibility

Issue

DP&I requested consideration be given to accessibility in relation to the details demonstrating compliance with the finished floor levels of the footpath areas adjoining Block 8, as well as the recommendations of the Access Review prepared by Morris Goding Accessibility Consulting.

Proponent Response

The finished floor levels of the footpaths surrounding Block 8 provide a level and accessible path of travel in and around the building, as shown in the Architectural Drawings prepared by Smart Design Studio and provided at **Appendix A**, and supported by the Access Review undertaken by Morris Goding Accessibility Consulting (January 2014).

The review concluded that the proposed development demonstrated an appropriate degree of accessibility in accordance with the relevant controls. The main recommendations that arose from the review were to:

- Ensure the adaptable units comply with the recommendations outlined in the report, to comply with AS4299 and AS1428.1-2009; and
- Ensure a continuous accessible path of travel is provided to the garbage room used by the ground floor residents, compliant with AS1428.1-2009.

The recommendations of the review (including those above) will be addressed as part of ongoing design development prior to commencement of the works.

2.2.3 Community Consultation

Issue

DP&I requested consideration be given to the Outcome Report prepared by Elton Consulting in response to consultation with the community. Details of the report and how the issues raised by the community during the consultation phase have been addressed in the application are to be provided.

Proponent Response

The community consultation process has comprised a Briefing Session with the Chippendale Residents Interest Group (CRIG), which took place on Thursday 10 October, and a Community Consultation Day including a Site Tour and Q&A

Session, which took place on Saturday 12 October. Informal consultation has also taken place with surrounding neighbours.

As a result of the consultation the following changes were made to the proposal, which resulted in the exhibited proposed development, the subject of SSD 6092:

- The building envelope was massaged in consideration of overshadowing, visual and view impacts and scale;
- The building envelope was massaged and stepped heights were lowered in consideration of the street frontage as read from O'Connor Street;
- The louvered façade was further articulated to break down the overall massing of the built form; and
- Existing street trees were retained along O'Connor Street and 'planter boxers' at the ground floor were provided to improve open space provision for occupants and define the public and private domain.

In addition, the proponent (Mr M Caddey and Mr M Goldrick) met with CRIG on 26 February following lodgement of the SSDA. The main issues discussed were the GFA increase from Mod 8, massing of the building and increased shadowing, all of which are identified in CRIG's formal submission and are addressed by the proponent in the Response to Submissions Table – Chippendale Residents Interest Group provided at **Appendix L**. Also raised were construction related matters such as parking, dust and construction vehicle movements.

The Community Consultation Outcome Report prepared by Elton Consulting is provided at **Appendix E**.

2.2.4 Amenity of Dual Key Apartments

Issue

DP&I requested consideration be given to the amenity of the dual key apartments in relation to the amount of private open space provided to each unit, whether the units are cross ventilated, and the level of solar access provided.

Proponent Response

All dual key apartments are provided with the following amenity:

- Spatial planning which,
 - Delivers studios ranging in size from 27m² to 31m²,
 - Delivers 1 beds ranging in size from 44m² to 46m²,
 - Optimises the depth of the apartment and delivers appropriately sized bedroom and living areas;
 - Locates the bathroom and storage areas to the rear of the apartment, affording bedroom and living areas premium access to natural light;
 - Clusters wet areas back-to-back to ameliorate acoustic transfer;
 - Enables flexibility of use by two occupants, with the ability to conveniently adapt the apartment for single occupation.
- Loggias and balconies, with operable glazed doors or screens for individual environmental control of the external space to manage rain, wind, breezes and acoustic privacy;
- Private open space to,
 - Studios ranging from 2.6m² to 7.5m²,
 - 1 beds ranging from 7.2m² to 7.5m²;

- Storage within the apartment which is complimented by additional storage in the basement, conveniently accessible by lift;
- Natural ventilated and/or cross ventilated areas;
- Access to natural light which is enhanced by the reflective quality of the louvered façade which bounces light into the apartment;
- Access to direct winter sunlight;
- Living room windows which directly overlook the street providing good visual connectivity;
- Privacy from the public domain provided by loggias, balconies, blades and louvres which filter views into and out of the apartments; and
- Good outlook and views from all aspects;

The amenity of the dual key apartments is considered in the revised Architectural Drawings prepared by Smart Design Studio and provided at **Appendix A**.

3.0 Preferred Project

In response to the submissions received, minor amendments have 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 Smart Design Studio and provided at **Appendix A**.

3.1 Changes to the Proposal

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

- Addition of windows at both the northern and southern ends of lobbies on all levels of the building, except level 12 (see **Section 2.1.1** above);
- Reduction in the depth of single aspect apartments on average to 10m, and reduction in the depth of south facing single aspect apartments on average from 14.5m to 14m, and amendments to the internal layout of these apartments (see **Sections 2.1.2** and **2.1.3** above);
- Amendments to the number of car parking, motor bike parking and bicycle parking spaces, relocation of the car share spaces, deletion of visitor car parking spaces and redesign of accessible car parking spaces;
- Provision for potential outdoor seating for exclusive use by the retail tenancies on the ground floor; and
- Design of the palisade fence and interface between the public and private domain of ground floor apartments (see Recommended Conditions 2 and 3 in **Appendix I**).

3.2 Description of the Proposal

As a result of above amendments the proposed development now comprises of:

- A thirteen (13) storey mixed use building with a total of 178 residential apartments, a residents' lounge and gym at ground floor, communal roof-top terrace and ground floor food / retail;
- A total of 178 apartments including:
 - 43 x studio apartments
 - 63 x 1 bed apartments
 - 59 x 2 bed apartments
 - 13 x 3 bed apartments
- A total Gross Floor Area (GFA) of 14,875m²;
- 135m² of non-residential floor area at ground level with active street frontages;
- External terraces, balconies or loggias to all apartments; and
- Three levels of basement comprising car parking, bicycle parking, end-of-journey facilities, and services infrastructure.