



Stephane Kerr

University of Sydney Town Planner, University Infrastructure

6 October 2020

Ms David Gibson

Team Leader, Assessments

Department of Planning Industry and Environment

Locked Bag 5022, Parramatta

Dear Mr Gibson

**SSD-7539 Darlington Terraces Mixed Use Development
University of Sydney 3rd Response to Submissions**

The University of Sydney (the "University") refers to DPIE's letter dated 27 July 2020, and subsequent emails by DPIE's Principal Planner, Social and Infrastructure Assessments (dated 29 July, 11 August and 18 September 2020), in which the Department seeks further information regarding the following matters listed below, and to which the University responds accordingly:

DPIE Issue 1: Overshadowing diagrams submitted with the amended proposal have not demonstrated that 120 Darlington Road receives sufficient solar access throughout the year. Building B must be revised to reduce the overshadowing impacts and improve solar access to 120 Darlington Road as per page 88 of Campus Improvement Program 2012-2020.

University response: The project architect AJ+C has revised the plans for Building B to incorporate a side (northwest) building setback so that there is no built form within the area nominated to be removed to the concept building envelope approval by the Cox Richardson Urban Design Justification attached to the approved 2013 Campus Improvement Program SSD 13_6123.

The result of this setback demonstrates No.120 Darlington Road will receive 2 hours of sun to at least 8m² of private open space all year round and will therefore satisfy the objectives of Sydney DCP 2012 clause 4.1.3.1 Solar Access. The reduction in overshadowing to No.120 is further ameliorated by removing the full length of the room to the north-west corner of the building and not just the overlapping corner with the Cox Richardson 'box'.

Please refer to following Attachments accompanying this submission:

- **Attachment 1:** AJ+C Revised Block B & Shadow Analysis
- **Attachment 2:** AJ+C 120 Darlington Road Shadow Impact
- **Attachment 3:** Darlington Terraces Amended Plans package



DPIE Issue 2: Provide BASIX certificates for Nos 86 and 87 Darlington Road, as these are proposed to operate as dwelling houses for use by visiting academics and their families.

University response: The University submits BASIX Certificates for the following properties:

- No 86 Darlington Road, BASIX Certificate No: A387260 dated 26 Sept 2020 (**Attachment 4**)
- No 87 Darlington Road, BASIX Certificate No: A386558 dated 23 September 2020 (**Attachment 5**)

DPIE Issue 3: Demonstrate that adequate amenity is provided to future occupants of the converted terraces in relation to communal open space areas. Whilst overall communal open space for the proposal may meet relevant standards, each group of terraces and the communal open space areas for each group must be adequate to provide acceptable amenity.

Explanation (DPIE email dated 29/07/2020): Address the following groups of terraces where sufficient amenity has not been provided for future occupants particularly given the small room sizes:

- 121 -123: 17 beds require 20.4sqm for kitchen, 21.25sqm for lounge : only 16sqm and 18.2sqm provided respectively. No direct solar access to living space.
- 114 to 119: 35 beds require 42sqm for kitchen and 44sqm for lounge: 28sqm and 24sqm provided. No direct solar access to living space.
- 108 to 113: 35 beds require 42sqm for kitchen and 44sqm for lounge: 23sqm and 27.8sqm provided. No direct solar access to living space.

University response: The University submits a *Table of Communal Areas* (**Attachment 6**) and *Plans of Communal Areas* (**Attachment 7**) within the existing and terraces and new building clocks, for the proposed development which is measured against the:

- Sydney DCP 2012 requirement for Boarding Houses
- Proposed Housing Diversity SEPP standard for Communal Areas (indoor)

The attached documents conclude:

- a total of **335 occupants** to the combined Terraces and new building student accommodation facilities;
- 121-123 Darlington Terraces provides a total 114.70m² communal space
- 114-119 Darlington Terraces provides a total 52.00m² communal space
- 108-113 Darlington Terraces provides a total 50.80m² communal space
- all of the Terraces comfortably satisfy the Department's recently released proposed *Housing Diversity SEPP and criteria/standard for Communal Areas (indoor)* – see further explanation below.



The University argues that the Darlington Terraces and the 3 new proposed buildings A to C cannot be viewed as individual and separate buildings in the absence of surrounding community and support facilities. This mixed-use development needs to be recognised as a holistic student accommodation facility, not individual buildings.

The ‘Terraces’ form part of the new Darlington Terraces blocks that provide significantly larger areas of shared communal facilities. We note for example that new Darlington **Building C** is solely dedicated to 244m² of shared communal facilities (Learning Hub, Study Room, Lecture Theater and Bathroom), with no student accommodation provided therein, to which all of the Darlington Terraces (existing terraces and new builds) occupants.

New draft Housing Diversity SEPP: The University notes and welcomes the recent DPIE release of the new *draft Housing Diversity SEPP - Explanation of Intended Effect*, which for the first time proposes land use and criteria specifically for Purpose Built Student Housing. Amongst the exhibited criteria, and the following proposed standards for room sizes, communal areas (indoor and outdoor). The Darlington Terraces SSD proposal satisfies these criteria.

Explanation of Intended Effect for a new Housing Diversity SEPP		
Room size	Minimum 10 m ²	<p>The minimum room size is based on similar standards in other jurisdictions and reflects current industry practice, which is to provide a range of room options in a single development, including rooms that have an area of less than 10 m²</p> <p>The proposed 10 m² standard will be a discretionary standard. This will allow developers that wish to, to demonstrate that a smaller area has adequate internal amenity and that shared facilities are available to compensate for the smaller room size.</p>
Communal area (indoor)	15 m ² per 12 students	High quality indoor communal space must be provided to meet the study, social, and religious needs of students. Depending on the size of the development, multiple rooms could be appropriate.
Communal area (outdoor)	Consider access to open space	In locations that are within 400 m of the relevant university, it may be possible to rely on the open space that is provided on campus. In other locations the new SEPP will recommend 2.5 m ² of outdoor space per student.



Definition of University Student Accommodation: The University has long argued that our mixed-use student accommodation facilities are not Boarding Houses but have had to rely upon the Boarding House controls as the only source of standards for such facilities. The new Housing Diversity SEPP will now introduce more appropriate standards for purpose built university student accommodation facilities.

For those who live in on-campus residences, the residential experience is a significant part of Australian undergraduate education. It extends beyond the lecture theatre, and encompasses more than a safe, affordable bed. Our research reveals that the 1st year of university is critical in relation to whether a student will drop out before finishing their course. Issues such as a sense of belonging, social integration, engagement with study and broader life on campus, and exposure to new people and ideas are all factors that the University of Sydney's Student accommodation encompass to ensure that students thrive and can have an exceptional university experience.

The University of Sydney's student accommodation model is based on:

- fostering a family environment that is socially inclusive;
- building a strong sense of community within the residence, the University, and the wider community;
- promoting leadership and civic engagement; and
- recognising, valuing and celebrating diversity (abilities, talents, nationalities, cultures and interests).

The Darlington Terraces development is based on this model, and further benefits from close access to additional student community facilities and spaces within the **Regiment Student Accommodation** located directly opposite the Darlington Terraces proposal. The Regiment Building was designed to enhance student campus life by providing shared experiences and learning spaces, encouraging students and staff to meet, collaborate and socialise. The University has created purpose-built spaces available to all, to promote a sense of community and cross-pollination of learning, skills and ideas. These purpose-built spaces are as follows:

Regiment Student Accommodation – shared communal facilities (480m²):

- The Maker Space, providing a variety of equipment such as 3d printers, Form Printers, Milling Machine and high power computer for 3D modelling. The space provides the residing in University Student Accommodation with the ability to collaborate and develop their creativity for course work and leisure (151m² total).
- Virtual Reality Room, which allows residents residing in University Student Accommodation to socialise through VR escape rooms or to use the VR for educational purposes (20m²).



- 5 x Teaching Rooms – provides residents residing in University Student Accommodation University with technology enabled classrooms that can be used for presentations by the residents or the University, informal tutoring, and resident's group work (259m² in total).
- 3 x Music Rooms – allows residents residing in University Student Accommodation either practice with their own instruments or learn to play the piano or the drums (50m² in total).

Furthermore, these student accommodation buildings are co-located within the Darlington campus from where students have direct and immediate access to a plethora of other student community facilities both on the campus domain and within adjoining buildings, all within a maximum 2 minute walking distance.

This development is intended to support a student's academic, personal, cultural, social and recreational experience of living away from home, often for the first time. The University of Sydney student accommodation has built and designed a number of student accommodation buildings over the past 5 years. One of the main attributes of our buildings and their design is the communal living for the residents and the fostering of a community within its student accommodation portfolio.

The University does not focus on the building but rather on the community within the University's accommodation portfolio and how internal and external areas can be used by the residents. Therefore, student accommodation cannot be compared to boarding house accommodation as it is much more than just a room. The communal living encourages the residents to interact on all levels from cooking together in the kitchen to watching a movie in the theatre.

The residential life program provided by the University to the residents provides social activities, academic learning, and life skills. The program encourages the residents living in the student accommodation to interact on a floor and on a building basis as well as on a portfolio basis which again creates a larger student accommodation community.

The Darlington Terraces external areas are also an extension of the internal communal spaces. They are enhanced by providing the resident with Wi-Fi enabled outdoor areas which can be used for both social and academic purposes.

The residents residing in any of our accommodation have access to all the facilities within our student accommodation portfolio, from meeting rooms to makers spaces that enhance the student experience and promotes a great community environment.



The University of Sydney prides itself on providing safe and affordable student accommodation to our students where they are part of an inclusive community in which they can live and learn.

In conclusion, the university requests the Department reconsider its position for provision of additional communal facilities within the certain existing Darlington Terraces, due to the University compliance with the intended *Housing Diversity SEPP* standards for indoor communal spaces, combined with the Terraces' juxtaposition and proximity to a greater range of student communal facilities within the new Darlington terraces blocks, the Regiment mixed-use student accommodation development directly across the road (north) on Darlington Road, and the Abercrombie Business Precinct development directly south on Codrington Street.

DPIE Issue 4: Address BDAR waiver issues raised by EESG.

Explanation/Request - Letter dated 6 July 2020 by DPIE Climate Change and Sustainability Environment, Energy and Science):

A search is to be undertaken by looking for bats or signs of bats in suitable roost habitat during the daytime. All roost searches should use a torch to shine in holes, cracks and crevices, and carry a handheld bat detector to locate bats that may call. If bats are detected, observers must confirm the identity of the species and determine if the roost is a maternity roost. A report should then be completed which includes a description of the searches undertaken.

University response: By report dated 27 August 2020, *Ecological* has concluded its survey and report by qualified ecologist conducted during daytime roost searches for microbats for signs of bats present within holes, cracks and crevices within areas of the Darlington Terraces to be removed (refer to **Attachment 8**).

The *Ecological* survey and report conclude there were no signs of bat activity (droppings, invertebrate exoskeleton piles, heard calls) or roosting in any of the Terraces.

The University believes this package of information concludes the final list of issues sought by DPIE in its assessment of the SSD_7539 project. Please do not hesitate to contact me for any clarification or with any queries on the university's response – I can be contacted on 9351-3128, or by email: stephane.kerr@sydney.edu.au

Yours sincerely,

Stephane Kerr

The University of Sydney Town Planner, University Infrastructure



Attachments

- Attach 1: AJ+C Revised Block B & Shadow Analysis
- Attach 2: AJ+C 120 Darlington Road Shadow Impact
- Attach 3: Darlington Terraces Amended Plans package
- Attach 4: BASIX Certificate for No 86 Darlington Road
- Attach 5: BASIX Certificate for No 87 Darlington Road
- Attach 6: Table Communal Areas
- Attach 7: Plans Communal Areas
- Attach 8: Ecological Microbat Survey
- Attach 9: AJ+C Darlington New Build Floorspace Schedule
- Attach 10: AJ+C Darlington Terraces Floorspace Schedule