



Courtesy City of Sydney Archives
Chippendale Residents Interest Group
Email: chippendalecommunity@gmail.com

4 April 2014

Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Mark Brown

Dear Mark

Central Park: SSD for Block 8 and Section SW 75 for changes to the Concept Plan (Mod. 9)

Thank you for the opportunity to comment. Our detailed submission follows.

[REDACTED]

[REDACTED]

Yours sincerely

[REDACTED]

for Chippendale Residents Interest Group

Encls.



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Submission: SSD Block 8 and proposed changes to Concept Plan (modification 9)

1. Introduction to Chippendale Residents Interest Group

Chippendale Residents Interest Group (CRIG) is a longstanding local residents' action group. Covering the area from Broadway to Cleveland Street; and Central Railway Yards west to City Road, members of the group have extensive experience making representations to Government and other authorities. This includes representations at the Land & Environment Court.

Our community has long fostered new ideas to improve the livability of our neighbourhoods - from green connector routes across the City, to achieving better environmental and planning outcomes for the local area.

The group is apolitical and its members and supporters reflect a diverse range of demographics.

2. Chippendale: Key Challenges

Chippendale has a unique set of challenges:

- a. Chippendale has already undergone substantial growth, with far more on its way.

By 2011, the residential density was 113 residents per hectare¹. This compares to 125 residents per hectare for Pyrmont, 103 for Redfern and 39 for Rosebery. Given a large part of Chippendale is used for educational/commercial facilities, parts of Chippendale now house over 500 residents per hectare.

In addition the local working population has tripled since 2001 to 3,300 people in 2011. To date, this has been largely on the north east corner of the suburb. The introduction of the University of Notre Dame in 2008 has added an estimated 4,000 + students who regularly visit the suburb. Operating without a master plan, the university's continued expansion is impacting local amenity and resources.

By 2017, Chippendale's residential density is estimated to increase to an average of 278 residents per hectare. In addition are an estimated 5,000 workers with a large influx of visitors and students each day.

While the changes respond to the State Governments strategic plans, community consultation has been minimal if any. The changes also contradict representations by various authorities over recent years that development outside Central Park would be restricted, and the influx of students and visitors on Central Park contained.

¹ Density is based on an area of 0.36 km² (not 0.45 km² which includes the area over the railway yards thereby distorting the figures).



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Given the amount of change, this necessitates a very careful considered approach for each application, particularly in terms of its impact on local amenity.

Note: For the purpose of this submission plans for Central to Eveleigh Corridor are not considered (9 hectares of the corridor are contained in Chippendale).

- b. Chippendale has an acute shortage of open space and facilities².

While the introduction of Chippendale Green is welcome, given the increase in population (including workers, students and visitors) the open space per resident will be far less than 1 m². This compares to a minimum standard for the City of Sydney being 6.6 m² and an average of 34.80 m² across the City of Sydney LGA (refer Annexure A). The lack of open space and facilities locally has become a key access and equity issue.

As such plans for Block 8 need to be considered in context of this challenge and not increase demand on local resources thereby reducing local amenity.

- c. Chippendale has some of Sydney's highest traffic volumes³ and slowest traffic flows⁴.

Recent research by the *International Agency for Research on Cancer* (IARC) on Air Pollution and Cancer⁵ illustrates the risks for communities who are live in close proximity to major transport routes.

Yet despite these challenges, the State Government has announced that traffic capacity on Abercrombie Street (and Regent and Cleveland Street) will be increased. In the case of

² The City of Sydney Open Space study (2006) found Chippendale has the LGA's lowest open space, i.e. 1.36 sq. m/resident. This compares to a minimum standard of 6 m² for Green Square and 6.6 m² for other suburbs in the LGA. Refer Annexure A. At the time of the 2006 study, Chippendale's population was ~3,000 residents. By 2017 Chippendale will have ~10,000 residents. This assumes minimum development outside of Central Park. This projection assumes a base population of 4,400 residents in 2012 (City of Sydney) plus an incoming population of ~ 5,550 residents for Central Park (refer traffic report for Mod. 8). In addition we estimate at least 5,000 workers (assumes 3,300 workers - ABS, 2011 plus ~1,700 additional workers.) On top are thousands of students and visitors using local facilities. Inadequate campus facilities and the absence of a Master Plan for the University of Notre Dame is resulting in a disproportionate use of local facilities. These projections are much higher than those envisaged at the time of approval of Concept Plan 1, and its major revision (Concept Plan 2). Consequently Chippendale Green does not alleviate the acute shortage in open space. This is demonstrated by its current use, with the park regularly at capacity (largely preventing local residents from using it). Further, access to regional open space is affected due to road barriers and distance (refer the Open Space and Recreation Needs strategy for the City of Sydney, 2006). Given many local homes and apartments do not meet the minimum open or recreational space

³ More than 1.6M vehicles travel through Chippendale each week. Whereas traffic volumes on other key roads in the LGA is decreasing, traffic volumes through Chippendale have increased, with plans to further increase.

⁴ Cleveland Street is NSW's slowest performing road (December, 2013). Abercrombie Street is not measured; however our observations are that the route is as slow, if not slower than Cleveland Street. This has a corresponding impact on local population and wellbeing.

⁵ http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221_E.pdf



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Abercrombie Street it will become the City's major bypass route (NSW Government's City Centre Access Strategy; and draft Clearway Strategy).

Given the proximity between Block 8 and Abercrombie Street this presents significant challenges in terms of meeting the relevant criteria for residential developments near main roads, while ensuring ESD requirements are not compromised.

- d. The interface between Central Park and its massing, in context of the existing local population and Chippendale's heritage conservation area. In particular, the effect on local amenity needs to be considered carefully given the site's proximity to existing residential neighbourhoods. This includes the impact on local vistas, overshadowing and privacy as well as visitors and residents in the area.

Of importance to local residents⁶ is:

- e. Protecting existing neighbourhoods which are residential areas, in terms of enhancing their livability and amenity
- f. Protecting and enhancing the integrity of Chippendale's heritage conservation area
- g. Ensuring that development adjacent to Chippendale's heritage conservation area interfaces well to the existing urban form so to preserve the heritage area and existing streetscapes. This includes the Abercrombie Street frontage and adjacent heritage areas. Given the scale of development at Central Park, this has the potential to dominate and significantly change the streetscape and heritage urban form.

3. Proposal

- a. Construction of a 13 storey building and 3 level (basement) car park including:
 - 178 residential apartments: 43 studios, 63 x 1 BR apartments, 59 x 2 BR apartments, 13 x 3 BR apartments
 - a ground level lounge/gym for residents and two retail spaces (135m²)
 - basement parking for 88 cars, 10 motor cycles and 251 bicycles

The proposed GFA for Block 8 is 14,303 m². This reflects an increase of 2,850 m² from modification 8 to the Concept Plan (where the GFA for Block 8 was reduced).

We note there is an addition of some roofing items on top of level 13. It is unknown what this relates to.

- b. Modification 9 to the Concept Plan include:
 - Relocating 2,850 m² from Blocks 1N & 4N (on Broadway) to Block 8

⁶ Survey conducted by Chippendale Residents Interest Group, January 2013



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- Alterations to the upper level setback for Block 4S
- Changing pedestrian access to Block 1 (to Chippen Way) and vehicle access (to the south-west of the block)
- Changes to vehicle access to Block 4S and Block 8

While the overall GFA for Central Park being 255,500 m² remains the same, we are unclear about the mix between commercial and residential GFA (for each Block). This should be confirmed with an opportunity provided to comment.

The proposals raise a number of issues, including concerns about the consultation process, which follow.

4. Consultation Process

- a. We understand that a Design Competition for Blocks 8 and 11 was held in June 2013 with the preferred architects and scheme chosen. We were not aware of this at the time. Consequently neither CRIG nor local residents were invited to comment on the brief, or provide feedback as part of the competition process, even though a general Central Park Information day was held by Frasers in late May.
- b. A request for a DGR was lodged with the Department of Planning in August 2013. The DGR included an outline of the project and indicative floor plans and elevations.
- c. The DGR was issued on the 13 September 2013. This sets out requirements for the application including the necessity to consult with Chippendale Residents Interest Group and affected landowners. The DGR states that the EIS must describe the consultation process and issues raised; identify where the design of the development has been amended in response to these issues and provide a short explanation where changes cannot be accommodated.
- d. Local residents and members of CRIG first saw the plans in October 2013. In the case of CRIG, we met with the representatives of the proponent on 10 October. A public meeting/site tour was conducted on the 12 October – lasting for about an hour. This meeting only provided a minimum time to look at the plans and for discussion to take place given a large part of the time was spent on a “site tour”.

We note some of the information relayed at the public meeting/site tour was incorrect. This included information about the process; what had been approved in terms of the plans for Central Park, and information relating to the number of storeys for Block 8. In the case of these meetings, as has occurred previously, requests for copies of meeting notes (taken by Elton Consulting) were declined. This raises concerns about transparency and accuracy of meeting notes (given previous concerns about notes relating to the redevelopment of the C.U.B site).



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At each of these meetings as previously the case, there was difficulty getting information about the building height(s). This information is often not even available when there is a project manager in the room. When later provided, the information is stated in Australian Height Datum. This makes it difficult for residents to understand what is proposed particularly as the City of Sydney's height controls use above ground height. This has led to confusion about the scale and massing, particularly when the number of storeys is incorrectly stated.

While the maximum height is set by the Concept Plan, given the impact that the proposal has on many local homes - particularly in terms of their vistas, privacy and overshadowing, residents are frustrated that they are not more widely consulted (particularly those who are affected landowners).

e. In relation to the plans shown in October, the issues raised included:

1.	Increase in GFA Block 8	<p>The GFA for Block 8 was reduced in the previous modification (8); with the case made that approval of the application would see a reduction in massing for Block 8 to better interface with the scale of the adjacent heritage conservation area.</p> <p>As such it was disappointing to learn that subsequent to approval of Block 4S (and modification 8) the application for Block 8 proposes to reinstate most of the GFA. While we are advised that the changes are designed to improve solar access to Block 4S and Block 1N, given the change in use from "commercial" to "residential", it is unreasonable to consequently allow Block 8 to reduce local amenity.</p> <p>Given these concerns we asked that the initial plans for Block 11 be made available so options could be considered in terms of moving some massing to better integrate the buildings adjacent to the low rise heritage conservation area. This was not forthcoming other than some media being sighted.</p>
2.	The loss of the open space (slot) on O'Connor Street.	<p>The open space on O'Connor Street has consistently formed part of public presentations. Here, specific concerns were raised about the loss of communal open space and potential overshadowing as a result.</p> <p>We note at that stage it was not made apparent that the</p>



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		<p>communal open space requirements would not be meet; rather we were told that the location of the open space (slot) on the O'Connor Street frontage was arbitrary and could be used elsewhere in the block. However, subsequently we understand that changes to the Concept Plan are required.</p> <p>Further, while requested, shadow diagrams were not available at the time. This is discussed next.</p>
3.	The impact the massing has in terms of overshadowing and loss of vistas	<p>Concerns relating to the increase in overshadowing were not fully understood at that time; irrespective concerns were raised in general in relation to any increase in overshadowing.</p> <p>In addition concerns were raised about approval for Concept Plan 2 (which significantly increased the massing) and in particular about the data that was used to consider the impact in terms of overshadowing on local homes; i.e. some buildings appear to be classified as "commercial" when they were (and still are) "residential" homes. Consequently, we believe the impact in terms of overshadowing was not identified for some homes.</p> <p>We were unaware of these reports at the time, given they followed the public exhibition process. We assume the reports were sought by the Expert Advisory Panel (EAP) to look more closely at the potential overshadowing. The panel's report indicates that issues relating to solar access and overshadowing were particularly important to their decision making. This included a requirement that 70% of residential apartments on Central Park have sufficient solar access.</p> <p>As such, the assumptions that were made in terms of the impact that the massing will have on some local homes/apartments appears to be flawed. In response, we urged the proponent and architect to review the plans for Block 8, with a view to reducing the massing and</p>



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		<p>overshadowing (rather than increasing it).</p> <p>Note: In the interim since approval of Concept Plan 2, a four storey residential block (previously commercial premises) has also been approved for the site directly opposite to Block 8 (on O'Connor Street).</p>
4.	The lack relief along the O'Connor Street frontage and its potential impact in terms of wind movement	<p>The wind movement along O'Connor Street (near Block 8) already presents a significant challenge, particularly during winter months.</p> <p>Given the inherent issues that have emerged in relation to wind movement on other parts of Central Park (e.g on the corner of Towers 2 on Broadway; along Central Park West (near Tower 1 and 2); along Carlton Street) we suggested further review.</p>
5.	Insufficient set back from Abercrombie Street and management of the public domain area.	<p>Concerns about the setback from Abercrombie Street were raised, in terms of traffic and the management of the public domain area - suggesting that the building overhang should not be over the public domain. Further concerns were raised about the separation between the pedestrian area and Block 8 on O'Connor Street.</p>
6.	ESD requirements	<p>How ESD requirements (including cross ventilation will be met) can be met, when the windows/doors/loggias will require glazing, and need to be sealed to meet the relevant noise requirements for developments on main roads. (Reference is made to comments by the City of Sydney in relation to the loggias - we believe the loggias will be closed, and as such the GFA should be included).</p> <p>Further, we note that at the time of the approval of Concept Plan 2, the argument put forward by Frasers in making the case to increase the overall density and scale of development was largely based on the site's "6 star" ESD credentials.</p>



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7.	GFA calculations.	<p>Questions are raised about the GFA calculations. While the proponent may seek to rely on the approval of previous applications, we believe the process needs review, particularly given the role of the loggia on Abercrombie Street (to minimize noise) and its use.</p> <p>Further, buildings such as the Park Lane demonstrate the use of loggia is part of the living space. Consequently the GFA should be included. In doing so, this would provide an opportunity to reduce the massing.</p>
8.	The number of units and apartment mix	<p>Concerns relating to the number of studios and smaller apartments which is contrary to previous representations from Frasers about the use of Block 8. While we understand the current market makes it attractive to cater to a particular market, a greater unit mix should be provided to ensure a diverse and wide population base. We note a social impact assessment has not been provided.</p>

- f. Subsequently the SSD was lodged with a public exhibition period. Consequently we met with Frasers in February to discuss some key concerns. This included the increase in GFA and the potential to reduce the massing, and/or move it elsewhere. In response Frasers advised a number of options had, and were still being considered.

Other issues included the overshadowing on nearby homes and concerns relating to the report(s) provided to EAP in 2008 as well as the application of \$2.5M for community facilities. In addition some concerns relating to Block 11 were discussed in brief. Questions relating to Kensington Street were referred to Frasers MD, Dr Quek, with the suggestion to discuss the massing.

A number of actions were to follow:

- A meeting with Dr Quek to discuss the option to move the massing from Block 8, and also questions relating to Kensington Street.
- Options that were considered to move the massing from Block 8 to Blocks 1N and 4N).
- Information relating to the shadow diagrams.



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Given the meeting with Dr Quek could not be organized until March an extension in time was confirmed with Planning NSW. Subsequently, the shadow analysis was received (18 March) however there has been no subsequent news about a meeting with Dr Quek and massing options.

In the interim, we have raised concerns with Frasers about the plans by the NSW Government to increase traffic capacity on Abercrombie Street, and the impact will have on construction traffic.

5. Issues

At this time, the issues previously raised remain. In addition, a number of other items are raised:

1.	The façade design	A number of residents have raised concerns about the impact that the plans for 58 – 64 Abercrombie Street will have in terms of the façade for Block 8. Specifically the plans appear to replicate Block 8. Residents have suggested this be reviewed so that each building has sufficient design merit independent of the other.
2.	GFA and land use	Reference is made to previous comments about the split between commercial and residential use. While GFA drawings are available, further information is required, to confirm the GFA for the Block. While concerns are raised separately in relation to the non-inclusion of the loggias, we are unsure as to the application of “NSA”. Specifically will the apartments be residential apartments, or used as serviced apartments. If intended for use as serviced apartments, this raises a number of concerns, which we would appreciate the opportunity to respond to.
3.	Insufficient communal open space and the reliance on the use of “Chippendale Green”.	Given the release of plans it is now apparent that there is insufficient communal open space, with a reliance on the use of Chippendale Green. Any use of Chippendale Green should be in addition to the open space requirements for an individual development (as is the case for other developments in the area). Chippendale Green was largely achieved by the he accumulation of a number of City of Sydney land holdings. The purpose of the park and its location (as distinct from areas that are publicly accessible) is intended to service the



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		<p>larger Chippendale community. This followed the open space study commissioned by the City of Sydney for the purpose of considering the CUB site redevelopment. This found that Chippendale had an acute short of open space and lack of facilities. In response, specific commitments were given to the local community prior to the approval of Concept Plan 2. These related to Chippendale Green and the use of areas in Central Park to ensure they are used as open space, and remain publically accessible.</p> <p>Given the commercial mix was previously higher; this reduced the demand on open space, particularly after hours and on weekends. Likewise firm commitments were given that the buildings on Central Park would not be used as student housing (given the additional demand on local facilities and impact in terms of ensuring a diverse social mix is maintained).</p> <p>A number of changes have subsequently been made to the Concept Plan. This includes an increase in the retail area as well as the promotion of Central Park as a destination. While this is contradicts with previous representations, what has become apparent is that Chippendale Green is often at capacity well before the remainder of Central Park is developed.</p> <p>In addition, there are often different expectations between Central Park residents and the local community in terms of the use of Chippendale Green and public areas. In part this may reflect the sales campaign to purchasers. This has raised concerns in relation to the longer term use of publically accessible areas, and whether access will change at a future point in time; e.g. the use of Park Lane while publically accessible, its title is held by a number of parties.</p> <p>As such, the lack of sufficient communal open space on Block 8 and reliance on Chippendale Green is inappropriate. Given the demand on local resources, the necessity for sufficient communal open space is essential</p>
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		as part of the plans for Block 8.
4.	Internal Amenity	<p>The single aspect studios range between 10.8 m and 13.4 in depth. This does not comply with the 8 metre depth under SEPP 65, and should be amended particularly given the solar access constraints.</p> <p>In particular, there are concerns about proposal to “borrow amenity” for the bedroom area of a studio from an adjoining living area. This is not considered good design practice nor meets the relevant ESD criteria.</p>
5.	Solar Access to residents in Block 8	<p>Concept Plan 2 was approved on the basis of 2 hours solar access to 70% of residential apartments, between 7 am to 4:30pm. This presents a departure from usual SEPP 65 requirements.</p> <p>As such a reduction in solar access is not supported, particularly given the increase in apartments and proposed mix.</p> <p>A query is also raised, if new solar studies were conducted in relation to the solar access for Block 8. This follows concerns relating to the reports provided to the EAP in terms of overshadowing on nearby homes.</p>
6..	Overshadowing on local homes and Chippendale Green	<p>Previous comments are reiterate. Notwithstanding this, having reviewed the shadow analysis some queries remain about the interpretation of the different colours (on the legend).</p> <p>Further, the report indicates that overshadowing will increase over:</p> <ul style="list-style-type: none"> • 8 - 12 Dick Street. This is not supported, particularly in relation to the impact this will have on 8a and 8b Dick Street which homes are large warehouses that rely on solar access particularly during winter. Further, there are concerns whether previous studies used incorrect base line data – given these lots are residential homes.



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		<ul style="list-style-type: none"> • Abercrombie Street terraces: While the increase is defined as relatively small, there is a substantial increase over the roof area. This constrains the use of light wells, attics and future works. As such the increase in overshadowing is not supported. • O'Connor Street Façade: This suggests a loss of 12.56% access at 21 March (at 1.30pm). Given the significant overshadowing that was previously approved, any further loss is not supported. • Chippendale Green: The design report indicates the increase is only nominal at 0.6%. However given the park is shown as 6.629 m², this raises a query is the assumption is correct. Further, the loss of vistas from Chippendale Green west to Abercrombie Street, will make any increase in overshadowing more prominent. As such the increase is not supported. • 25 Abercrombie Street (corner of Blackfriars Street). Since the initial approval of concept plan, these premises have been changed from commercial to residential use. Any increase in overshadowing is not supported. • 58 - 64 Abercrombie Street: In 2012, this lot was approved for residential use (4 storeys). Subsequently any increase in overshadowing is not supported.
7.	Retail Shops and Use	<p>Previously commitments were given to local residents that the Abercrombie Street frontage would not be used for food and beverage areas or night time economies; rather the use would be focus on home-wares or design shops to limit the impact on local amenity.</p> <p>The CPTED report (dated Dec 2013) indicates that the two retail tenancies will operate as cafes/restaurants trading to 11pm, as part of a "night zone". This indicates plans for a "strip" to emerge (along with the retail shops under Building 4S). This contradicts specific representations by</p>



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		<p>Frasers and the City of Sydney - most recently in June 2013 that retail strip and introduction of night time economies would not be introduced. Further the public domain report, indicates that the use of the public domain area outside the shop on the northwest corner. This reduces public amenity for the purpose of private use.</p> <p>While the use of the shops is approved at a later stage, given these concerns and the potential use of SEPP for exempt and complying development to approve the use, is there an opportunity to address these concerns through the application process?</p>
8.	Use of Public Domain and Footpaths around Block 8	<p>Concerns are raised about the Block's easements. In particular that the public domain and footpaths outside Block 8 are dedicated public space (vs publically accessible areas).</p> <p>Further it appears that the easements are relative to the overhang from the building (and loggias). Given the loggias are not included in the GFA, yet the public domain areas are effectively reduced, this seems inappropriate.</p> <p>In particular the public domain on Abercrombie Street has long been public land. To effectively reduce this, and increase the overall massing of the building seems unreasonable.</p>
9.	Access to and from Block 8 and Central Park	<p>The State Government is proposing to upgrade Abercrombie Street to increase traffic capacity. Consequently traffic will be greater along Abercrombie Street impacting local amenity as well as access and egress to Block 8 and Central Park. Further there are concerns that traffic will substantially increase along O'Connor Street due to its potential rat-run from Regent to Abercrombie Street.</p> <p>In response a draft discussion paper was prepared to consider potential options to reduce traffic on Abercrombie Street. This included the potential to</p>



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		<p>introduce a separated bike lane for the purpose of encouraging drivers to change transport modes. The route could potentially be integrated with a cycle-way along O'Connor Street (east) thereby reducing vehicle rat-running along this street. A reduction in massing or further set back to Block 8 on the south side would potentially allow improvements to the public domain and in turn reduce overshadowing on homes.</p> <p>We are keen to explore these options with view to further input from the community and Frasers, Planning NSW, the City of Sydney and Transport NSW.</p>
10.	Construction Hours	<p>Residents in the area are experiencing construction fatigue given the length of time that construction for Central Park is underway.</p> <p>We understand the staging of works is likely to see construction works for Blocks 3A, 3B, 3C, Kensington Street, Block 10 (on the east side) and Blocks 8, 4S and 1N occur within a relatively short period of time (to 2016). In addition construction of Block 11 is anticipated by 2017.</p> <p>This presents significant challenges not only in terms of the impact on residents, workers and local amenity but the health and well-being of residents.</p> <p>As such, the construction hours need to be restricted to regular construction hours.</p>
11.	Construction Traffic Management	<p>The construction management report indicates that no more than 12 truck movements are expected during peak hours (when work construction of Block 4S and Block 8 overlaps). However no reference is made in the report to the proposed plans to increase traffic capacity on Abercrombie Street nor expected challenges in terms of regional traffic detours that are designed to cater for the construction of the light rail project.</p> <p>The assumption is made that the construction traffic will have a legible impact. Yet local evidence suggests one</p>



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		<p>truck accessing the site from Abercrombie Street can result in potential gridlock. Further past experience indicates that trucks waiting to access the site typically park or idle outside local homes on Abercrombie Street (through to Cleveland Street) - barely 2 metres away from living areas or bedrooms. This requires further consideration in terms of monitoring.</p> <p>As such further review of the staging of works at Central Park should be considered along with the management of construction traffic. In doing the opportunity for further community feedback is sought.</p>
12.	CPTED Report	<p>This report relates to crime prevention through environmental design. For the purposes of considering the crime and safety aspects for this application, the report appears to rely on consultation at the time of Concept Plan 1 and Concept Plan 2 (2006, 2008); with more recent consultation with Redfern Crime Prevention Officer two years ago in preparation for Block 4S. The assumptions are consequently out of date.</p> <p>In particular we note that has been an increase in crime in Chippendale in recent months. This includes two fire bombings, one directly opposite Block 8 on O'Connor Street, and another close by in Queen Street. In addition there have been three other fire bombings in the past few years on the east side of Chippendale. In addition, there are now issues in relation to the use and management of Chippendale Green.</p> <p>Further, the report refers to an "Outcome" report for the purposes of detailing community feedback and how the issues raised are being addressed. While a summary of the issues is provided in the EIS, the issues raised have not been addressed. In terms of the actual detailed report, reference is made to the report however it could not be located in the documents online. This raises concerns previously indicated in this submission. We would</p>



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		appreciate if the report is provided asap.
13.	Wind Report	<p>We refer to concerns previously raised in this submission.</p> <p>The January 2014 consultant's report indicates some potential issues in terms of comfort for pedestrians walking along Irving Street and on the corner of Abercrombie and O'Connor Streets.</p> <p>Further, the report indicates that the building articulation has substantially not changed from the original form with no recent wind tunnel testing conducted. Given the removal of the open space/slot on O'Connor Street and inherent issues that are presenting themselves in relation to wind impacting pedestrian movement on parts of Central Park, we suggest further review and wind tunnel testing is necessary. Likewise given the potential for solar reflection on local homes, the report may require review.</p>
14.	Traffic and Transport Report	<p>Revised figures suggest that there will be 550 car movements per hour accessing the site, with the assumption made this will only have a minor impact on local traffic. We query the assumptions and suggest further consideration should be given to the changes in regional traffic and local traffic network.</p> <p>In addition access to parking for Block 8 is now proposed to be introduced from Irving Street with access to 88 car spots over 3 levels. This includes 28 accessible car spaces and six car share spots. Given the initial representations about car parking on Central Park being restricted to avoid generating additional traffic, further information is sought in relation to the 28 accessible spots.</p> <p>Further, the report mentions "<i>Council's plans for an off road shared pedestrian/cycle pathway along the eastern side of Abercrombie Street</i>". This reference also appeared in a previous report which was subsequently denied. The report makes no mention of access using a new regional route along Balfour Street/Meagher Street. Given the</p>



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		wider implications and our previous comments in this submission further information is sought on this.
15.	Noise Impact Assessment	<p>The report confirms it will be necessary to use 10.38mm glazed windows and doors, with acoustic seals. The report also confirms that alternative ventilation or air conditioning will be necessary.</p> <p>Reference is made to meeting the relevant ESD standards, and Green Star Rating.</p>



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Annexure A

Table 2: Comparative Assessment of Rate of Provision of Public Open Space

Geographic Area	Total open space per resident (m²)	Total local/non regional open space per resident (m²)
Chippendale	1.36	1.36
Surry Hills	6.17	6.17
Ultimo	8.80	8.80
Glebe	26.60	4.30
Green Square (levy required on new development)	N/A	6.0
Former South Sydney LGA (estimate)	12.0	6.0
City of Sydney LGA	34.80	6.60
Median for Sydney Region	85.03	29.52