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David Gibson, Team Leader Social Infrastructure Assessments
NSW Department of Planning and Environment
23-33 Bridge Street,
Sydney NSW 2000

Attention: Peter McManus, Senior Planner
Email: peter.mcmanus@planning.nsw.gov.au

Dear Peter,

RE: SSD 7081 – Faculty of Arts and Social Sciences, University of Sydney

I refer to your invitation to comment on SSD 7081 for the proposed construction of the new Faculty of Arts and Social Sciences (FASS) Building and alterations to the RD Watts Building within Sydney University.

The City has had an opportunity to review the proposal and provides the following points of submission on urban design, landscaping, heritage, transport and sustainability issues.

Urban Design

Architectural expression
Opportunities are present to articulate the Parramatta Road façade of the FASS Building further. The building's Parramatta Road elevation is approximately 70m long and has high reliance on the glazed curtain wall facade system providing interest. The building will be highly prominent from Parramatta Road and Arundel Street. Folds, steps, a break or alternating colour in the facade of the building, particularly when viewed in the westerly direction, would assist in its presentation.

Materials and finishes
The Department is requested to seek further details on the proposed mesh façade system for the FASS Building to satisfy itself that the elevations of the building can be adequately assessed. There seems to be no certainty in regard to the apparent aspiration for materials in the project.

Crime Prevention through Environmental Design
The Department is requested to form a view whether the commentary within the planning report satisfies the Stage 1 Campus Improvement Plan conditions for a Crime Prevention through Environmental Design (CPTED) Assessment. In this regard, a CPTED Report prepared by a qualified consultant is generally a more targeted assessment of actual medium-to-high risk criminal or anti-social issues within the local context based on empirical research, which then sits alongside recommendations that reduce the potential for these issues to occur within and around

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the development. It is the City's view that the commentary within the planning report is not sufficient. More succinct design approaches may emerge from expert analysis.

Public Art
The proposal does not provide details with respect to incorporating public art into the buildings or the public domain. The EIS states that public art is required with all new buildings within the University. Details should be provided with the application to ensure that public art is integrated into the proposal at this stage.

Landscaping

Tree Planting
A significant quantity of mature trees are being lost as a result of the Campus Improvement Masterplan across the University, including on this site.

There is adequate space to plant additional large specimen trees, particularly along Parramatta Road, as part of the proposal. In combination with the above comments regarding visual prominence from Parramatta Road, mature planting that provides some screening to the westerly view to the building should be considered.

Interface with Heydon-Lawrence Road
Heydon-Lawrence Road to the east reaches levels of approximately 3m higher than the front courtyard to Level 2 of the proposed FASS Building.

The scope of works under the SSD DA are unclear, however, it seems there is an opportunity to improve the level change between the road and the site. The current proposal appears to be limited to some awkward terraces and a 3m high wall.

Further resolution is required to the interface with Heydon-Lawrence Road to the east, to ensure the level changes are well integrated into the landscape design, and that welcoming, safe spaces are created between buildings.

Heritage

Whilst there is an overall separation between the new FASS Building and the RD Watts Building, there is inadequate details about the proposed awning connection between the two buildings. Detailed drawings showing the overall design, materials, finishes, colours and fixings to the heritage building, prepared with input from a suitably qualified heritage consultant, should be submitted. The design and extent of the awning should be detailed to minimise visual and physical impacts on the RD Watts Building.

Despite the demolition of the heritage Substation No. 54 under a separate Part 5 Review of Environmental Factors, the SSD is requested to require the retention of the existing Parramatta Road gate and use of interpretation devices to demarcate the former stairs and structure.

Transport

The traffic report provided by GTA notes that the proposal will accommodate up to 258 staff and 842 students/others (1,100 in total). The proposal is to provide 36 new bicycle parking spaces for the development. This is an underestimation of the cycling facilities required for the site. Applying the rates applicable within Sydney Development Control Plan 2012, the provision of 1 bicycle space per 10 staff and

students is appropriate. The provision of an additional 26 staff bicycle spaces and 85 student bicycle spaces should be considered as a minimum.

It is noted that the Sustainable Transport & Mobility Plan identifies that student and staff travel by bicycle is 5%. However, this is lower than Council's Sustainable Sydney 2030 Strategy goal of at least 10% of City trips made by bicycle.

There are currently some 44,400 students and 6,200 staff at Sydney University. Currently the University provides some 1,300-1,400 bicycle parking spaces. This is below the Sydney DCP 2012 rate which would require 5,060 bicycle spaces if applied to the whole university. Further, by 2020, the student population is projected to increase to as many as 53,000 and the staff to 6,600 which would require a total 5,960 of bicycle spaces. The GTA report notes that the existing bicycle parking spaces are, not surprisingly, heavily utilised.

The staff bicycle parking should be class 2 facilities (known as Class 'B' in the latest Australian Standards) and provided as per AS2890.3:2015, and be located at an accessible at-grade location in a separate location to the visitor parking area.

Student parking might be class 3 facilities (known as Class 'C' in the latest Australian Standards) and provided as per AS2890.3:2015 and be provided at an accessible at-grade location. However, given the ability to provide students with swipe card access, the City would encourage predominately class 2 facilities.

Staff and visitor parking would best be provided in a separate location.

It is recommended that numbers similar to what is required per Council's DCP be applied. This would require:-

Bicycle Parking Type	Total	Requirements
Staff	26	Spaces must be Class 2 bicycle facilities
Non-residential Visitor / Student	85	Spaces must be Class 2 or Class 3 bicycle facilities
End of Trip Facility Type		
Showers with change area	13	
Personal lockers	111	

Note: *Australian Standard AS 2890.3:2015 refers to class 1 as class 'A', class 2 as class "B", and class 3 as class 'C'.*

Aside from the above cycling infrastructure, the City would also recommend the preparation of a Green Travel Plan for the development. A Green Travel Plan would demonstrate that the site will encourage modal shift away from car use and to the use of Sustainable Transport options (for staff and students) such as walking cycling and public transport.

Sustainability

The University of Sydney's Sustainability Framework is considered acceptable in lieu of industry tools. The University used the same rating system for another recent proposal (LEES1 proposal for 8 storey science, teaching and research building facing City Road) and documentation provided was strong compared to that commonly submitted to the City by the private sector when the city is the consent authority.

The following detailed comments are made with regard to ESD proposals:-

Construction Environmental Management Plan
The ESD report indicates as follows:

> *"A comprehensive Construction Environmental Management Plan is to be implemented prior to any early works, demolition or construction stages are commenced on the project. The Head Contractor is to hold the accreditation to demonstrate compliance with this requirement. In this case, the Head Contractor for the project must have a valid certificate before and throughout construction. All subcontractors must be required to adhere to the EMP conditions, and monitored for compliance."*

Further detail on monitoring and reporting above and beyond that done by the Principal Certifying Authority as a standard part of inspections regime is requested such that the CEMP's ESD commitments are checked and recorded.

Waste and Materials
A Demolition & Construction WMP is specified in the ESD Report and waste to landfill targets are referenced. Timber certification is indicated (i.e. 50% of fall timber). Concrete ambitions are referenced as follows:

> *"At least 25% of all fine aggregate (sand) and coarse aggregate inputs in the concrete are to be from manufactured sand or other alternative materials (measured by mass across all concrete mixes in the project) and the average content of portland cement used in the concrete mix are to be reduced by at least 30% compared to a reference case. This is to reduce the environmental impacts of concrete used within the project."*

The above ESD commitments should be obligated by conditions of consent. The City suggests that any such condition refers to *"All standards in the ESD Report are to be implemented throughout the project"* or similar.

Water Conservation
Strong water saving outcomes are incorporated into the proposal, as long as they are delivered, including intent to capture rainwater and use for toilet flushing.

There is inconsistency between Sections 3.3 and 3.3.2 of the ESD Report – in the later, use of rainwater for toilet flushing is not a clear commitment. A clear commitment to dual plumbing or other design solution to ensure toilet flushing by non-potable source (using the 110kl water tank that has been designed in) with mains potable back up should be provided. It is also unclear why the proponent is not opting for waterless urinals in Section 3.3.1.

Energy Efficiency
The passive solar performance of the FASS Building is not described. The overall ambitions for the shell's performance should be articulated into particular components of NCC compliance – i.e. lighting, mechanical ventilation / HVAC efficiency levels are definable in these terms (e.g. "10% better") and the Applicant should ensure the ESD report is revised such that exceedance beyond minimum standards are overtly expressed for specific elements.

The ESD report states that the FASS Building is targeting "up to a 10% energy improvement to the National Construction Code Part J provisions". The City has been made aware that such claims cannot be ratified at this coarse level (i.e. "10% above BCA"), therefore a revision to this target in real terms is necessary.

External lighting should be LED standard or better, in terms of energy efficiency.

The RD Watts Building will receive considerable overshadowing in winter from the FASS Building. The impacts on the RD Watts Building should be set out as the nett outcome is likely to be an increase in energy demand. Performance ambitions for the RD Watts Building should also be instilled into the project.

Renewable Energy – Photovoltaics
A P.V. system is proposed and described as follows:-

> *"The array will utilise the area of the rooftop not used for plant and areas that fall below the planning height restrictions which is approximately 85m2. The final details of this system are subject to further design development."*

The roof plan indicates a very modestly sized system. University of Sydney has previously undertaken a tender for services to provide campus-wide solar installations.

While part of the roof area is trafficable there is extensive metal sheet roofing with excellent northerly aspect that, given the Parramatta Road buffer, will not be over shadowed in the foreseeable future.

The size (expressed in kilowatt peak (kWp) of the p.v. system should be maximised – at present, as indicated on the roof plan, it is considered tokenistic. The cost of p.v. has fallen dramatically, the University has research and teaching expertise in solar energy / p.v., and the proposal needs to demonstrate the genuineness of its commitment proven technology. An array of capacity of approx. 40 kWp could readily be accommodated on the roof space available. A commitment to a system size should be locked down prior to consent.

Solar water heating options also exist in line with Sydney University strategic direction – but is not indicated in the SSD.

The City would be pleased to offer draft conditions for the Department's consideration, primarily on heritage grounds and health matters, once the Applicant has had an opportunity to consider submissions.

Thank you for providing an opportunity to comment on the proposed development. Should you wish to speak with a Council officer about the above, please contact Russell Hand, Senior Planner, on 9265 9333 or at rhand@cityofsydney.nsw.gov.au.

Yours sincerely,

Graham Jahn AM
Director
City Planning I Development I Transport