

24 January 2019  
218001

Ms Carolyn McNally  
Secretary  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2000

Dear Ms McNally,

**Attention:** Ellen Manix, Senior Planning Officer

**RE. SSD 9275 - Response to Submissions  
80-88 Regent Street, Redfern**

We write on behalf of Iglu No. 209 Pty Limited (the Applicant) in relation to SSD 9275 at 80-88 Regent Street, Redfern. An Environmental Impact Statement (EIS) for a State Significant Development Application (SSDA) for the site at 80-88 Regent Street, Redfern, was publicly exhibited for a period of 28 days weeks between 18 October 2018 and 14 November 2018.

In total 18 public submissions (including 15 template submissions) and 13 local and state government agency submissions were received in response to the public exhibition of the SSDA. The Applicant, and the specialist consultant team have reviewed and considered the Department of Planning and Environment's and public agency's comments and the public submissions and have responded to the issues raised.

This cover letter sets out the Applicant's response to the issues raised, details the final project including a number of minor revisions to the SSDA. This report should be read in conjunction with the Environmental Impact Statement dated 5 December 2014 and the following supporting documentation:

- Amended Architectural Drawings prepared by Bates Smart (**Attachment A**);
- Supplementary Design Report prepared by Bates Smart (**Attachment B**);
- Response to Agency Submissions prepared by Ethos Urban (**Attachment C**);
- Response to Public Submissions prepared by Ethos Urban (**Attachment D**);
- Building Services Cover Letter prepared by IGS (**Attachment E**);
- BASIX Certificates (**Attachment F**);
- Amended View Impact Analysis prepared by Ethos Urban (**Attachment G**);
- Acoustic Impact Cover letter prepared by Acoustic Logic (**Attachment H**);
- Preliminary Construction Noise and Vibration Impact Assessment Plan (**Attachment I**);
- Retail Strategy prepared by Iglu (**Attachment J**);
- Swept Path Diagrams prepared by Varga Traffic Planning (**Attachment K**);
- Site Investigation Cover Letter prepared by EI Australia (**Attachment L**);
- Detailed Site Investigation prepared by EI Australia (**Attachment M**);
- Amended Site Survey prepared by Mitchell Land Surveyors (**Attachment N**);
- Amended Quantity Surveyor Statement prepared by WT Partnership (**Attachment O**);
- Wind Impact Cover Letter prepared by Windtech (**Attachment P**);
- Amended SEPP 1 Objection – Floor Space Ratio prepared by Ethos Urban (**Attachment Q**); and
- Metro Corridor Impact Statement prepared by TTW (**Attachment R**).

## 1.0 Design Modifications

A number of minor design changes have been made in response to submissions received from government agencies and as a result of further project planning. Accordingly, amended Architectural Drawings prepared by Bates Smart are provided at **Attachment A**. The scope of proposed changes is listed below and the changes that require further discussion are detailed within the following subsections.

- Modification to the awning design including lowered height at the street corner and removal of breaks along the Marian Street;
- Modification to the western façade to introduce additional modulation and varied materiality;
- Provision of an 800mm podium setback to William Lane to allow footpath widening;
- Minor reconfiguration of the southern retail façade line to achieve an average footpath width to the norther side of Marian Street of 3m;
- Minor increase in the Gross Floor Area (GFA) from 7,169m<sup>2</sup> to 7,188m<sup>2</sup> (+19m<sup>2</sup>) due to minor internal replanning and GFA recalculation;
- Provision of End of Trip facilities including bicycle parking at the ground floor to service retail and commercial tenants; and
- Provision of a rear mezzanine level egress point to lifts for the retail tenancies to allow disabled access.

### 1.1 Awning Design

In response to the GANSW's recommendation, the proposed awning has been redesigned. Specifically, GANSW suggested the height of the stepped awning height at the corner of Regent Street and Marian Street be reconsidered to achieve sufficient and consistent weather protection along the footpath for pedestrians. In addition to this, the Department acknowledged Windtech's recommendation to avoid breaks in the awning along Marian Street had not been incorporated into the design.

Accordingly, the amended awning design responds to the topography of the site by stepping down Regent Street, with the height at the Regent Street and Marian Street corner lowered to provide improved weather protection. Further to this, the breaks in the awning along Marian Street have been deleted to minimise wind downdraft.

The originally proposed and amended awning designs are provided at **Figure 1** below.

**Originally Proposed Awning**

**Amended Awning**



**Figure 1 Awning comparison**

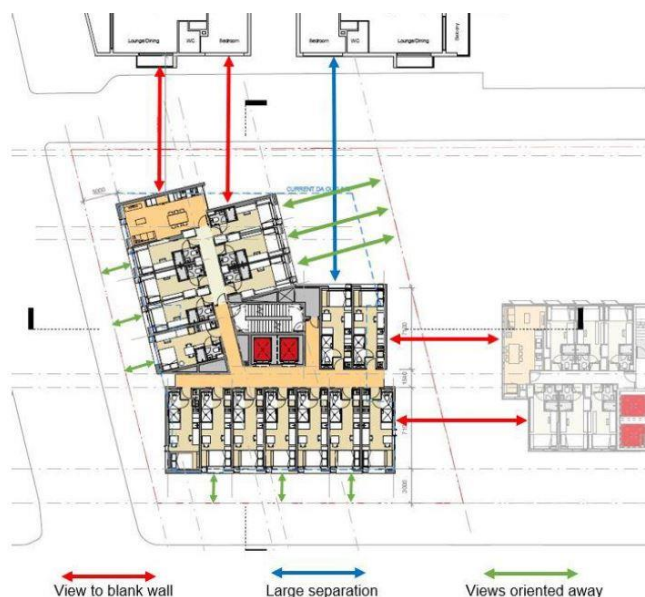
Source: Bates Smart

## 1.2 Western Façade

In response to GANSW's recommendation, the western façade has undergone minor design development to improve the interface with the adjoining residential buildings to the west. Specifically, additional modulation and visual interest has been created by the incorporation of a kitchen exhaust slot to split the brick wall, as well as a horizontal banded division of the charcoal panels at each level.

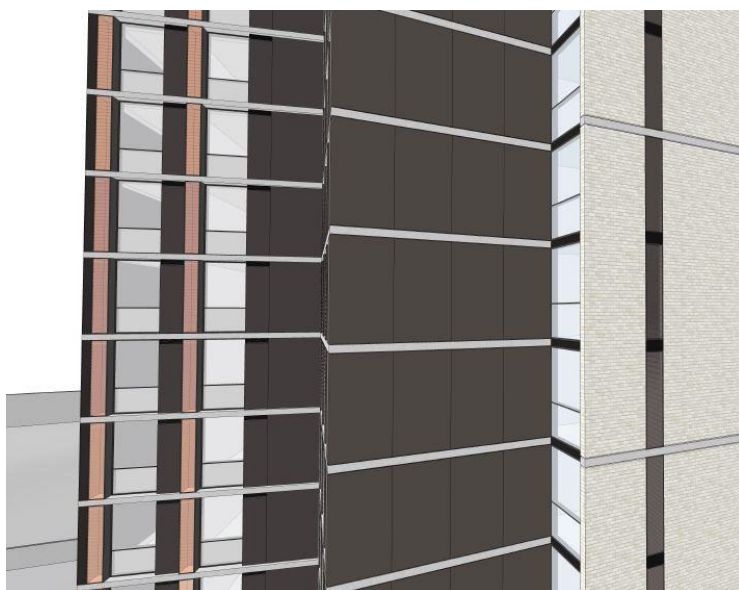
The volume facing Marian Street and the volume facing the Level 1 courtyard now read as distinct and different volumes, whilst the direction of windows and openings have been carefully positioned to maintain privacy to the adjoining 7-9 Gibbons Street residential apartments as illustrated at **Figure 2**.

The amended western façade is illustrated at **Figure 3** below.



**Figure 2 Visual privacy measures**

Source: Bates Smart



**Figure 3 Amended western façade section**

Source: Bates Smart

## 2.0 Additional Issues

### 2.1 Washing and Drying Machines

The Department has requested further justification for the provision of 5 washing machines (ratio of 1 per 37-53 students) and 6 dryers (ratio of 1 per 31-44 students) to service the proposed development. It is noted that Iglu is an established operator of student accommodation with five existing facilities in Sydney, two in Brisbane and one in Melbourne. The proposed provision of washing machines at Regent Street is based directly on their day-to-day understanding of the needs of students.

The washing and dryer monitoring system currently utilised within the existing Iglu facility to the north (refer to **Figure 4**) confirms that there is an average washing machine usage of 0.63 washes per resident a week, for the period of March 2018 to October 2018 inclusive, with 0.85 of those being dried in the driers. However, Iglu's highest usage is reported from the Brisbane facility, in which at peak periods there is usage of 0.8 washes per resident a week.

Adopting the highest usage rate, of 0.8 washes per resident a week for the proposed development:

- **Demand:** 265 residents x 0.8 washes per week = 212 washes;
  - A wash takes approximately 1 hour;
- **Capacity:** 5 x 9-10kg machines – hours of operation – 7am to 9pm x 7 days per week = 490 washes per week;
- **Usage:** 212/490 – 43%.

It is noted that the laundry monitoring system currently in use at the existing Iglu building to the north includes features which ensures the laundries operate at optimal efficiency, such as:

- An app that allows residents to see if washing machines and dryers are available before they go to the laundry;
- A reminder is sent to residents at the end of each wash and dry cycle; and
- All payment for the laundry is from the resident's room card – no cash required.

This laundry monitoring system will also be provided within the proposed development for maximum efficiency.

The provision of washing machines was raised as an issue during the assessment of the Iglu facility to the north. At this time, a letter of support was provided to the PAC from UniLodge in relation to the Block 4S application at Central Park. The letter noted that across its portfolio of 2,338 beds their ratio of 1 washing machine/dryer per 53 beds operates without issue.

This represents two very established and experienced student accommodation operators confirming that the proposed provision of washing and drying machines is appropriate. The imposition of a requirement for additional machines would result in an inefficient and uneconomic allocation of financial resources and of space within the proposed facility.





**Figure 4** Existing washing and drying machines within Iglu 1 to the north

## **2.2 Lot Consolidation**

As detailed within the EIS, the proposed development has been designed to function as an integrated facility with the existing Iglu development to the north. Currently the two sites remain separate, however, Iglu proposes to consolidate the sites prior to occupation of the proposed development. The Applicant is supportive of a condition requiring lot consolidation to be satisfied prior to the issue of an Occupation Certificate.

### 3.0 Conclusion

Following on from the feedback received from the relevant government agencies and the general public, Iglu have responded to the issues raised and have made minor design amendments to the proposed development. The proposed development will provide student accommodation necessary to support Sydney's position and growth as a world-leading education provider, and ensure that students from regional NSW, interstate and overseas are able to access Sydney's leading tertiary education providers.

This report supplements the Environmental Impact Statement prepared by Ethos Urban dated 13 September 2018. Given the justification for the proposal, its fulfilment of strategic and design excellence objectives and the satisfactory resolution of potential environmental impacts, we have no hesitation in recommending the application for approval.

Yours sincerely,



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