



11316
13 March 2013

Mr Sam Haddad
Direct General
NSW Department of Planning and Infrastructure
GPO Box 57
SYDNEY NSW 2001

Attention: Ms Caroline Owen

Dear Caroline

**ADDITIONAL INFORMATION - DRAFT INSTRUMENT OF APPROVAL CONDITIONS
BLOCK 3B/3C AND 10, CENTRAL PARK**

This letter has been prepared to provide additional information and propose amended wording of conditions for the S75W application to the Student Accommodation to Blocks 3B/3C and 10 Central Park (MP 11_0900 MOD 1) following the meeting with the DPI, JBA, Frasers, and Iglu to discuss the draft conditions on 12 March 2013.

The items/conditions that were circulated via email prior to the meeting and discussed have been listed below, along with additional information, clarification and supporting details. The proposed amendments and wording of conditions has been included under each item.

As discussed in the meeting, we understand that a number of the conditions sought to be amended have come out of input from City of Sydney Council, similarly the wording of a number of conditions proposed is consistent with those imposed by the City of Sydney to a recently approved development application (student accommodation) at 1-13 Regent Street, Chippendale (D/2011/515/A).

Frasers and Iglu (a leading student accommodation provider) are working together to deliver the Block 3B, 3C and 10 student accommodation facility. Iglu is an experienced specialist student accommodation operator and investor and is best placed to assist Frasers deliver the facility. The conditions are listed below.

The amendments to the conditions are below with deletions shown in ~~bold strikethrough~~ and insertions are shown in ***bold italics***.

1. Visitor and Guests/Room Occupation

Condition E8 (ii) and F1 (b) of the approval instrument relate to allowing only a single person to occupy each room. For practical reasons, it is difficult to limit the one person per bed policy within the studio rooms. As discussed, it is proposed to amend the wording of this condition to allow for the event that a boyfriend/girlfriend/partner was to stay overnight. This provision is proposed to be limited to the studios and would not apply to the bedrooms within a cluster apartment.

The control and management of this arrangement is to be in accordance with the access and security provisions of the Operations Plan (submitted as part of the S75W), prepared by Iglu. The

Operations Plan will ensure that all overnight visitors are logged in to the visitors book for fire safety and security reasons. It is therefore proposed to amend the relevant conditions as follows:

Condition E8 (ii)

*the occupancy rate per bedroom must be capped at 1 person per room **except in the case of studios where an additional visitor/guest will be permitted to stay overnight on occasion**; evidence of identity and of student enrolment in a tertiary educational facility in Australia must be provided;*

Condition F1 (b)

*Each individual room of the student accommodation section is not to be occupied by more than one person per bed as shown on the approved plans **except in the case of studios where an additional visitor/guest will be permitted to stay overnight on occasion**. Any future change to the number of beds shown on the approved plans must first be approved by Council. Beds may not be replaced by double bunk beds;*

2. Documentation required for commencing students

The requirement to provide documentation in native languages is considered to be onerous. We are advised that any international student studying at an Australian Tertiary Institution or Australian University specifically is first required to attain a high level of competency in English (as tested by International English Language Testing System - IELTS). The provision of various versions and languages of the package of information is therefore considered unnecessary. The proposed amendment to the relevant conditions is outlined below.

Condition E8 (v)

students should be issued with information on how to contact Police, Ambulance and Fire Department ~~in translated formats~~, personal safety awareness sessions should be conducted at the start of each semester (or three times per annum), relationship could be established with the Ethnic Community Liaison Officer at the City Central Police Command;

Condition F1(i)

*All student occupants of the site are to be provided with a package notifying them of these requirements when they commence residency at the premises as part of the lease/tenancy agreement. **This, and other information required to be provided to the student occupants is to be provided in the native language of the proposed student occupant so that it can be easily understood.***

3. Public Art

Frasers (the proponent) is currently going through the process of appointing a new Central Park art curator and updating the public art policy/strategy for Central Park. This revised Public Art Policy will be submitted to and approved by Council and forwarded to the DPI. Concern is raised over the wording of the current condition (E11) that requires the proposal to be consistent with the Public Art Policy, despite the fact that the revised policy may not stipulate art is required to Block 3 or Block 10. For clarity, it is proposed to amend the condition slightly, as per below.

Condition E11

*High quality art work must be provided ~~within the development in publicly accessible locations, including near main entrances, in lobbies and on street frontages~~, in accordance with ~~the Central Sydney DCP 1996 and~~ the Public Art Policy **as approved by Council**. Details of the art work must be submitted to and approved by Council prior to an Occupation Certificate for above ground works being issued. All public art work is to be provided, installed and completed prior to issue of an Occupation Certificate*

4. Waste Collection

With regard to waste, the proposal is considered to produce commercial waste and therefore is not collected by Council. A private waste collection facility will be arranged by the operators for waste collection, and Council will not collect waste. This arrangement has been included in the statement of commitment, **Appendix D**, No 6 – Waste. It is therefore proposed to amend the existing condition E15 as follows:

Condition E11

Prior to an Occupation Certificate being issued or the use commencing, whichever is earlier, the PCA must obtain Council's approval of the waste and recycling management facilities provided in the development. ~~and ensure arrangements are in place for domestic waste collection by Council.~~

5. On-Site Management

It is proposed to amend draft condition E7 as discussed below.

The proposed condition requiring a member of staff to be available at reception 24 hours a day 7 days a week is considered to be onerous, given the numerous staff (Resident Assistants) residing on-site, and General Manager whom are all contactable and available. We note that the conditions that have been imposed on similar projects by the DPI and City of Sydney generally relate to requiring a single on-site caretaker who is "contactable" in the event of an emergency, and does not require the reception to be attended 24/7.

As outlined in the Operations Plan and additional information submitted, the management structure includes 4 full time staff during business hours, 5 live-in Resident Assistants and a General Manager. The General Manager will be based on-site full time and when not working will be contactable 24 hours per day, 7 days per week. In addition to the GM, the 5 Resident Assistants, who are employed directly by the operator and trained in student hospitality management and First Aid, will all be contactable and available 24/7 as required.

The Resident Assistants will reside within the development and will be accommodated throughout Blocks 3B, 3C and 10 where they will be able to provide direct care and assistance to the students in need and in the event of an emergency. A Duty Manager (of the RAs) is appointed at all times after office hours. The Duty manager will carry an operator provided mobile phone which all students will be provided the number of. Also note that during the duty manager's shift they are required to be present on site at all times. In their role, the managers will also perform administrative tasks on behalf of the operator for the facilities use, including but not limited to monitoring and registering visitors and guests in accordance with the Operations Plan.

This arrangement has been carried out on other sites by the future operator Iglu and provides for a significantly greater level of management and surveillance on site to that of a single caretaker (as has been applied for projects previously approved by the DPI and City of Sydney). Rather than a single caretaker on site who would not be available at all times, the proposed management structure allows for a total of 5 staff who reside on-site, who are directly contactable and available on-site for assistance, as well as the GM who is contactable 24/7.

Given the above, It is proposed to amend the wording as per below:

E7. Accommodation – Registration and Caretaker

*Prior to the issuing of an Occupation Certificate, Council's Health and Building Unit must be advised in writing of the business name, address, owner or company name, 24 hour contact details for the on-site manager, and the number of occupants approved for the premises. **The on-site caretakers/manager must be contactable 24 hours a day to ensure the orderly management of the student accommodation on Blocks 3B, 3C and Block 10.***

6. Laundry Facilities

It is proposed to amend draft condition B2(c) (laundry facilities) as discussed and outlined below. The key driver to this provision is to adequately service the residents and consider the commercial actuality of the operation.

As advised by the professional operator, Iglu, the proposed allocation of commercial sized washing machines and dryers (11 of each or a ratio of approximately 1:25) will sufficiently service all students on the site. A letter has been prepared by Iglu (attached at **Attachment A**) identifying the provision and utilization of laundry equipment across their portfolio of student accommodation buildings. Of a total of 494 dwellings, 14 washing machines and 16 dryers are provided. Data logged from Iglu Central (Regent Street) also indicates that on average, given the number provided, that each machine is used less than twice a day (1.9). As discussed, the proposed washing and drying machines proposed are greater in size than the standards sizing (between 7kg and 10kg), which is greater than what is understood to be envisaged (between 3kg and 5kg) in the Boarding House DCP 2004, created 9 years ago. The ratio across the Iglu portfolio is an average of 1:35.

The information and data provided from Iglu is further supported by correspondence from Unilodge (student housing provide (see attached to this letter at **Attachment B**). As outlined in the attached, Unilodge survey their residents bi-annually and as part of these surveys there has been no negative feedback in relation to the availability and access to washers and dryers. The ratio across the UniLodge portfolio is an average of 1:40 (projects less than 500 beds) and 1:50 (projects greater than 500 beds).

Furthermore, the UTS student housing development on Harris Street has a total of some 720 rooms and provides approximately 16 washing machines and a similar number of dryers. This equates to a ratio of 1:45.

With regard to the commercial arrangement and operation of these facilities; the machines are leased to Iglu by an external provider, who install and service the machines at no cost to Iglu. The profit of the machines is then divided between the provider and Iglu. Importantly, Iglu does not purchase the machines and understandably the commercial laundry operator (Commercial Laundry Appliances) is only prepared to provide machines justified by utilisation. CLA manage and operate over 1,000 machines and assesses the appropriate provision rate for student accommodation projects of the subject scale at 1 machine/dryer set per 50 students. The consideration of the commercial viability and arrangement is an important consideration when considering the wording of the condition.

Given the information and clear data provided by Iglu, Unilodge and other operational student accommodation facilities, the number and size of machines have been proposed to sufficiently cater to the needs of future students. As discussed, the centralisation of the laundry to Block 3B will be an important meeting place for residents and will be provided with TV, wireless internet, vending machines and seating to encourage sense of community and social interaction, in line with the policies and vision of the surrounding Universities and Tertiary Education institutions. The location, adjacent communal area and reception lobby will encourage interaction and allow for centralised maintenance and servicing consistent with CPTED consideration and on-site management.

The proponent and operator are open to the imposition of a positive covenant to be imposed on the laundry facilities within to align with the other proposed positive covenants set out in E20 of the draft conditions (of the modification).

Given the above, It is proposed to amend the wording as per below:

B2. Design Modifications

In order to provide acceptable management of the proposed student accommodation, the design of the buildings shall be amended as follows:

~~(c) Provision for separate laundry facilities (washing machines and drying machines) shall be provided in a suitable location within both Blocks 3B & 3C and Block 10 (i.e a total of two separate laundry facilities) in accordance with the requirements of the City of Sydney Boarding House Development Control Plan, 2004. A minimum of (11) 7-10kg commercial washing machines and (11) 7-10kg commercial dryers are to be provided for the occupants of Blocks 3B/3C & 10 and installed within the area shown on the architectural plans prior to the issue of an Occupation Certificate.~~

7. Bicycle Storage

It is proposed to amend draft condition B2(a) (bicycle facilities) as discussed below.

As outlined in the S75W, the proposal seeks to utilise a bicycle parking rack system known as JOSTA, which is utilised in North America and Europe, which can generally meet the relevant Australian Standard for Class 3 bicycle parking space. For consistency with this system, the existing condition B2(a) is proposed to be amended as per below. A similar bicycle parking system was proposed and approved (with a condition similar to that below) for the Iglu site at 1-13 Regent Street (Iglu Central).

B2. Design Modifications

~~(a) The layout, design and security of bicycle facilities either on street or off street must comply with the minimum requirements of Australian Standard AS 2890.3 1993 Parking Facilities Part 3: Bicycle Parking Facilities; and The layout, design and security of bicycle facilities either on street or off street shall be provided at a rate consistent with the stipulated Boarding House DCP and installed in accordance with the specification of the JOSTA system or equivalent; and~~

Should you have any queries about this matter, or require any further information please do not hesitate to contact me on 9956 6962 or sgouge@jbaplanning.com.au.

Yours faithfully



Stephen Gouge
Urban Planner