

29 March 2021

Our Ref: R/2019/22/B
File No: 2021/128240
Your Ref: SSD 10382

Rodger Roppolo
Senior Planning Officer - Key Sites Assessments
Department of Planning, Industry and Environment

By Planning Portal

Dear Rodger

Response to Submissions – Student Accommodation (SSD-10382) – 90-102 Regent Street, Redfern

Thank you for your correspondence dated 4 March 2021 requesting for the City of Sydney Council (“the City”) to comment of the Response to Submissions (RTS) for the abovementioned application for student accommodation at 90-102 Regent Street, Redfern.

The City has reviewed the submitted documentation. The RTS presents additional issues to those outlined in the City’s previous correspondence dated 14 December 2020 as follows:

1. Heritage

It is acknowledged that the applicant met with City Officers to discuss previous recommendations of retaining the existing buildings on the site. The RTS includes a Heritage Impact Addendum Memo, prepared by Artefact Heritage Services, as well as a Structural Statement by Webber Design, which overall recommends the demolition of the existing buildings.

The City maintains the position that the building at 90 Regent Street as well as the front façade and front rooms of the historic buildings at 92-96 Regent Street be retained. Whilst the proposal interprets the subdivision and warehouse buildings through the material articulation of the podium, the loss of these buildings is incomparable. Not only do the buildings provide a necessary transition from the adjacent heritage conservation area into the larger urban renewal precinct, their retention would reinforce the fine-grain pattern of buildings that once existed in the locality, which have now been eroded overtime. Unlike other sites within the Redfern-Waterloo precinct, the development on the site provides a unique opportunity to integrate existing fabric and break up the emerging and homogenous character of 18-storey towers above unarticulated and unmeaningful podiums.

2. Urban Design

a. Awnings

As previously raised, the proposed gaps in the awning and the width of the awning on Marian Street do not provide continuous and adequate weather protection. The RTS indicates that the gaps are required for the existing and proposed street trees. However, the submitted architectural plans demonstrate that the breaks in the awning do not correlate with the location of street trees.

b. Building Expression and materials

It is reiterated that the proposed materials for the development are unclear with the inconsistent coordination of the materials board and the elevation drawings.

c. Signage

It is acknowledged that the RTS removes one top of building sign. However, a new signage zone for a window sign is illustrated on the Regent Street ground floor elevation. It appears that it would screen the proposed meeting rooms and laundry facilities. However, it does not provide an inviting and active street frontage that creates visual interest in and from the building.

d. Outdoor areas

The common outdoor areas on the podium have become enclosed since the last iteration of the proposal, with an addition of a louvred awning for wind mitigation on the northern terrace. Similarly, the eastern and western terraces are now under glazed awnings. This could affect the amenity of the rooms adjacent to the eastern and western terraces in terms of reflected noise and lack of visual privacy. Additionally, these east and west terraces could become quite uncomfortable with heat being trapped under the glass awning.

The development could be improved if the rooms adjacent to the east and west terraces were common spaces similar to the north terrace. If this could not be achieved, the amenity and privacy of these rooms could be improved with a balcony in front of the rooms that act as a transition space between the east and west terraces and the internal rooms. Disconnecting the roof plane of the glass awning from the walls would also help release noise and heat gain and provide better air circulation in these spaces.

e. Street wall and parapet

The demolition of the existing buildings and its interpretation results in a 'missing tooth' in the street wall associated with the entry to the building on Regent Street. The proposed street wall largely expresses the existing subdivision pattern. However, the recessed section erodes the street wall and results in an interrupted tower coming to ground. A better outcome would be to reinforce the two-storey street wall.

Further, the development provides plant and services on the roof of the building. To optimise the building design, the City strongly recommends that the parapet of the building be raised to align with the height of the lift overrun. This would improve the visual appearance of the tower element in obscuring the visual clutter resulted from roof top plant. The raising of the parapet must comply with the maximum height control.

3. Contamination

The submitted remediation assessment by Douglas Partners maintains that the engagement of an NSW EPA accredited Site Audit Statement is not necessary as the remediation process is straightforward.

The City had previously recommended the engagement of a NSW EPA accredited Site Auditor to peer review the DESI and RAP to provide either a letter of interim advice or a Part B Site Audit Statement to endorse the remediation strategy as being capable of making the land suitable for the proposed use and for a Part A Site Audit Statement declaring the land as suitable for the proposed use at the end of the remediation process and prior to Construction Certificate.

The proposed remediation strategy is for capping and containing contaminants and for a passive long-term environmental management plan (LTEMP) to be in place.

The City recommends the engagement of an NSW Site Auditor, as previously recommended, to peer review the above documents and for any LTEMP to be approved by a Site Auditor as part of a Part A Site Audit Statement (Part A2).

4. Public Domain

The submitted public domain survey is not accurate and a true reflection of the levels on William Lane. The levels and gradients of all surrounding footpaths and lanes with the ground floor level of the proposed building has not been indicated in the section drawings.

More importantly, the finished floor levels and gradients of the development, notably the basement and loading bay entry and door openings as well as the finished floor levels of William Lane and footpaths must be indicated in the architectural floor plans. Overall, the finished floor levels of the development must comply with the Interim Flood Management Policy and Public Domain Manual.

5. Tree Management

Having regard to the amended plans, a revised Arboricultural Impact Assessment including a pruning specification, was submitted with the RTS. The City recommends that the proposed awning, equipment and temporary structures such as hoardings, scaffolding and piling are installed without requiring the removal of branches. Branches and the foliage of the young trees on Marian Street should be temporarily tied back rather than pruned. Any necessary pruning required should be identified by an AQF Level 5 Arborist prior to the installation of the awning or temporary structures to allow for design or installation modifications to reduce street tree pruning.

Pruning works must be specified in accordance with the Australian Standard 'AS4373–2007: Pruning of Amenity Trees' and not exceed 10% canopy removal or removal of branches greater than 100mm diameter of the Plane tree on Regent

Street. All plans are updated to show the TPZ, SRZ and existing canopy spread of existing street trees.

All street trees surrounding the site on Council owned land must be retained and protected in accordance with 'AS4970-2009: Protection of Trees on Development Sites'. The protection and retention of all existing trees is a priority for the City. Trees are long term assets that the community highly values. The proposed development and associated landscaping in the vicinity of trees, including street trees, has a high potential to impact in their health and structure. The City of Sydney Street Tree Master Plan includes general street tree protection measures and conditions that must be followed. See Section 8 of the document linked here, http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0010/130240/STMP2011_150501-PartD.PDF

6. Landscaping

The RTS demonstrates little change to the landscape design, with many issues previously raised remain unresolved. The proposed landscaping of the site is limited and indicates that the Sydney DCP 2012 requirement for 15% canopy coverage within 10 years of completion will not be met. The four new street trees on Regent and Marian Street will be on public land and therefore, do not contribute to the City's tree canopy requirements.

Changes on the Level 2 outdoor area include an enclosure of the common open spaces with glazed awnings and pergola for wind mitigation. However, this would impact on the provision of open space amenity and the success of new trees and landscaping on slab. Privacy and overlooking between communal areas and private habitable rooms is a concern on the eastern and western terraces.

The landscape plans must be amended to include the mature height and canopy spread of trees with consideration to soil volume, soil type, irrigation, shade, wind, drainage, watering systems and maintenance. The percentage of canopy coverage that will be achieved in 10 years from completion must also be specified in the landscape plan. It is recommended that the three 'Tristaniopsis Laurina – Small' on the Level 3 outdoor area be amended to include the planting of one medium size tree in lieu of three small trees. Overall, it must be demonstrated that planting of new trees would not be stunted but would reach their full generic potential and provide the maximum amount of canopy coverage at maturity.

7. Transport

The City reiterates that the development should provide 1 space per resident or at a minimum, 1 bicycle parking space per 2 beds. This equates to 177 bicycle spaces for single bedrooms and 27 spaces for the twin share bedrooms. Overall, a total of 204 spaces is to be provided for the development.

The provision of bicycle parking in the amended plans needs to be further clarified. Notably, the number of bicycle spaces provided on each level as well as the access arrangements to the parking is unclear. There is no indication as to what Class of bicycle parking is provided, which in turn, raises concern that these spaces do not meet Australian Standard AS 2890.3:2015 – Parking Facilities Part 3: Bicycle Parking Facilities, Austroads Bicycle Parking Facilities: Guidelines for Design and Installation', and the requirements of Sydney DCP 2012.

It should also be noted that the Ground Clearance Assessment contained within the submitted Traffic Statement, prepared by TTPP, is inadequate. A proper vertical clearance analysis is required that illustrates the roof height and truck roof in relation to the roof height for the length of the driveway and at the gradient change.

A Green Travel Plan, Transport Access Guide and Construction Pedestrian and Traffic Management Plan must also be provided.

8. Waste

The amendments to the basement and lower ground floor has negatively impacted on waste storage areas and access for servicing.

There is an inconsistency with the documents regarding the arrangements for the boarding house waste. The Waste Management Plan submitted with the EIS proposes that the City will service the residential component. However, the submitted Transport Impact Assessments details a private waste contract. This must be clarified.

Should it be clarified that Council will service the site, the development as proposed does not meet the requirements for Council collection. Access and loading areas must be built to accommodate a City waste truck as per the specifications detailed in the City's Guidelines for Waste Management in New Developments (2018). Further, separation between residential and commercial waste areas as well as chutes and chute infrastructure must be designed in accordance with the Guidelines.

Should you wish to speak with a Council officer about the above, please contact Reinah Urqueza, Specialist Planner, on 9265 9333 or at rurqueza@cityofsydney.nsw.gov.au

Yours sincerely,



Andrew Thomas
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 City Planning | Development | Transport