

21 May 2021

Our Ref: R/2019/22/C
File No: 2021/222315
Your Ref: SSD-10382

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

By Planning Portal

Dear Rodger

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

Thank you for your correspondence dated 28 April 2021 requesting for the City of Sydney Council (“the City”) to comment on the Revised Response to Submissions (RRTS) for the abovementioned proposal.

The City has reviewed the accompanying information. It is noted that the revised submission is generally the same as previously submitted where little change has been made to address concerns raised in previous correspondence dated 29 March 2021. The following matters are reiterated:

1. Heritage

The City has strongly encouraged the retention of the existing buildings on the site. Whilst it is acknowledged that the Government Architect NSW and the State Design Review Panel supports the interpretation of the fine grain subdivision and warehouse buildings through the material articulation of the podium, this gesture cannot compensate for the loss of the few remaining historic buildings in the locality. It is disappointing that the unique opportunity to discontinue the homogenous character of the Redfern-Waterloo urban renewal precinct, as presented by this development, was not recognised, and explored.

Notwithstanding the above, the City defers consideration of the retention of these buildings to DPIE as the consent authority.

2. Urban Design

a. Signage

There is a new proposed signage zone on the top of the awning on the east elevation along Regent Street. This zone would be acceptable if the height of the sign is synonymous with the height of the awning. It must be well integrated into the architecture of the building.

It is reiterated that the signage zone for a window sign next to the Regent Street entry does not provide an inviting and active street frontage. It creates visual clutter having regard to the additional signage zone for an awning sign within the same area of the Regent Street frontage and is recommended to be deleted.

3. Public Domain

A Flood Study and Assessment report, prepared by JHA, has been submitted with the RRTS. However, the report must be signed before it can be accepted.

The City requires that a swept path analysis be provided for truck entry and exit to the loading dock. It must also be ensured that door openings of the development remain on private land and do not open onto public space on William Lane.

The City makes a specific comment regarding footpath widening. Where a footpath is being widened on William Lane and Marion Street as part of this development, confirmation must be sought prior to determination as to whether this land will be dedicated to the City. Therefore, a separate land dedication plan must be submitted to the City to clarify this.

It is noted that detailed consideration to the public domain does not form part of this approval. As such, a separate public domain plan would need to be submitted to the satisfaction of the City prior to the issue of Construction Certificate.

4. Tree Management

The City does not support the removal of the street trees nos. 2 and 3 (Chinese Pistachio Trees) to facilitate construction access. All plans and documentation must be amended to show retention and protection of these street trees. The branches can be tied back during the installation of the proposed awning. Any necessary pruning must be specified by a AQF5 Arborist.

The protection and retention of all existing trees is a priority for the City of Sydney. 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. As such, existing street trees surrounding the site on Council owned land must be retained and protected in accordance with the Australian Standards *AS4970-2009 - Protection of Trees on Development Sites*. Further, all new proposed street tree plantings must be specified in accordance with the City of Sydney Street Tree Management Policy.

5. Landscaping

Generally, there has been limited response to the previous concerns raised by the City in earlier iterations of this development. The proposed landscaping continues to be limited. The 15% canopy coverage requirement within 10 years of completion as prescribed under Sydney DCP 2012 will not be met. The canopy coverage from street trees within Council land does not count towards the canopy provided from the site. Specifically, the *Syzygium 'aussie sothern'* located on the level 3 roof top and the *Tristaniopsis laurina* are not of a size that would require their retention and protection under Sydney DCP 2012 and, therefore, do not contribute to the canopy cover of the site. The landscape plans must be amended to provide the required 15% canopy cover under the Sydney DCP 2012 controls.

The landscape response states that 'appropriate planting provides for visual privacy between the student rooms and the adjoining communal spaces on the eastern and western terraces'. Based on the low-growing species listed in each relevant planter mix and the lack of detail on fenestration and screening in this location, this remains unconfirmed.

The planting of new trees in raised planters must be provided with adequate soil depth and volume in accordance with Sydney Landscape Code. This is to ensure the trees do not become stunted but reach their full genetic potential and provide the maximum amount of canopy coverage at maturity.

The garden beds proposed on Level two are not large or deep enough to sustain trees and must be amended to provide adequate soil volumes for the planting of trees as laid out within the Sydney Landscape Code. The smaller raised planters should be consolidated and made contiguous to allow for the soil volume and depth that can sustain mature trees.

The three '*Tristaniopsis laurina* – Small' within the Level 3 rooftop must be replaced with one medium sized tree and the rooftop terrace amended to be a garden bed that provides soil volumes consistent with the Sydney Landscape Code.

The limited detail on the glass canopy over the communal open space means that the stated gaps, which are necessary to allow heat to escape, is not confirmed. This detail, and the subsequent viability of the planting, remains in question. Substantially, more detail is required to confirm the viability of the landscape proposal, however given the lack of clarification to this point, this should be done to the satisfaction of DPIE.

6. Waste Management

The City reiterates previous comments with respect to the insufficient spaces allocated for waste and recycling management facilities and storage.

Waste loading area and arrangements are not in line with the Guidelines for Waste Management in New Developments 2018. The current design does not meet the requirements for a Council collection. Access and loading areas must be built to accommodate a City waste truck as per the required specifications detailed in the Guidelines and demonstrate a maximum 10 metre travel distance between the storage point and collection point for all waste and recycling bins and bulky waste.

There must be separation between residential and commercial waste/recycling storage areas. These waste storage areas and bulky waste storage areas must be separated and clearly labelled on the architectural plans. At least 2 square meters of commercial bulky waste storage space must be provided for the retail space as well as space in close proximity to retail premises to store re-usable items such as crates and pallets so that storage in the public space can be avoided.

The City does not support the compaction of waste within the bin (bin press). Compaction is supported for general waste only with the use of an above bin compaction device.

The Waste Management Plan (WMP) must provide details of the ongoing management of the chute systems including bin transfers, rotation and

arrangements for periodic servicing or chute failure. Additionally, WMPs for demolition and construction must be submitted. These plans are to include location of material storage areas for reusable materials and recyclables during demolition and construction; estimation of percentage of materials to be reused or recycled.

As previously mentioned, the RRTS has not adequately addressed the City's concerns and there remains some remaining issues. However, should an approval be granted for the development, it is requested that the City be given the opportunity to provide input on any conditions that will be imposed to any consent.

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,

A handwritten signature in dark ink, appearing to be 'AR' or similar initials, written in a cursive style.

Andrew Rees
Area Planning Manager