

3 December 2021

Our Ref: R/2020/15/A
File No: 2020/518257
Your Ref: SSD 1072865

Marcus Jennejohn
Senior Planning Officer, Key Sites Assessments
Department of Planning, Industry and Environment

Via Planning Portal

Dear Marcus

SSD 1072865 - Redfern Mixed Use Boarding House Development – Advice on EIS

Thank you for your correspondence dated 26 October 2021 inviting the City of Sydney Council (“the City”) to comment on the proposed State Significant Development (SSD) application for a new boarding house at 175 Cleveland Street, 177 Cleveland Street and 1-5 Woodburn Street, Redfern.

City staff have reviewed the application and have identified strong concerns with key aspects of the proposal, particularly regarding the suitability of the site for residential development. In summary, the **City objects to the proposal** and raises the following points for your consideration with detailed information contained within the following sections:

- Suitability of the site and non-compliance with key development standards
- Design excellence and urban design
- Social impacts
- Residential amenity
- ESD
- Land contamination
- Public domain
- Landscaping
- Servicing, waste and servicing
- Car and bicycle parking

1 Suitability of the site and non-compliance with key development standards

The development site is subject to the provisions of State Environmental Planning Policy (State Significant Precincts) 2005 (the SEPP). The site is located within the Business Zone – Mixed Use. The maximum permissible FSR is 3:1 and the maximum permissible FSR for the residential component within that is 1:1. The aim of this type of control is to encourage commercial and mixed use developments and limit residential development

in the mixed use zone. The SEPP also prescribes a maximum height control of five (5) storeys.

Certain sites zoned Business - Mixed Use are subject to FSR controls that limit the proportion of residential use within the site. Most sites are limited to no more than half of the FSR being residential, however this site and others in close proximity to Cleveland Street are limited to no more than one third of the FSR.

The application proposes a floor space ratio of 3.47:1, noting that a 0.5:1 bonus applies to the development under the State Environmental Planning Policy (Affordable Rental Housing) 2009. Of the proposed floor space, 0.1:1 is proposed as commercial use and 3.37:1 is proposed as residential use. Further the application proposes a 6-storey building with additional access and other structures on the rooftop, exceeding the 5-storey height control.

This proposal seeks significant departures from both the FSR and height development standard and submits a variation request in accordance with clause 16A of the SEPP. The City does not believe the variation request provides adequate justification of the departures from the key development controls. Most relevantly:

- 1) The FSR control is structured in such a way to encourage commercial development over residential development, and it is therefore reasonable to assume that this is an underlying purpose of the standard. As the residential proportion is further restricted on sites in close proximity to Cleveland Street, which is a very busy road in this location, this is likely to be due to residential amenity concerns.

The application fails to limit residential development within the Business – Mixed Use zone and contravenes the underlying purpose of the development standard. Further, the application is not consistent with the objectives of the zone as:

- a. A minimal mix of uses are proposed.
 - b. Minimal employment generating uses are proposed post construction.
 - c. The proposal provides minimal positive interface with the public domain as a result of fortification, servicing and misalignment of levels with the public domain at ground level.
 - d. The provisions for design excellence have not been met.
 - e. The proposed landscaping does not provide adequate amenity to proposed residents or the surrounding locality.
- 2) The objection fails to justify that compliance with the development standards would hinder the development from attaining the relevant objects specified in Clause 5 of the Environmental Planning and Assessment Act 1979, which are to encourage:
 - a. the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment, and
 - b. the promotion and co-ordination of the orderly and economic use and development of land.

- 3) The objection fails to demonstrate that the compliance with the controls is unnecessary or unreasonable in the circumstances of the case. More specifically:
 - a. it has been demonstrated that a compliant scheme is achievable on the site (SSD 6371);
 - b. there is no planning purpose served by supporting the variation, as the development does not result in an improved outcome that would not otherwise be achieved by adhering to the control, in fact strong concerns are raised with the quality of the design and the amenity it provides (further discussed below).
- 4) In light of all of the above, the submitted variation request is not well founded and should not be supported.

In regard to the application's compliance with the provisions of the Redfern-Waterloo Built Environment Plan August 2006, the City does not believe the application adequately meets the considerations of Section 4.4 relating to Land Use and Design Concepts for RWA's Strategic Sites. Specifically:

- 1) The proposal does not propose quality housing for existing and new residents in that:
 - a. The applicant claims that the boarding house will be used as affordable housing.
 - b. The proposal does not address indigenous housing needs.
 - c. Amenity facing Cleveland has not been maximised – as narrow single aspect rooms are proposed facing this orientation.
 - d. Amenity internally for single aspect courtyard facing rooms is similarly compromised with privacy screens required to address cross views between rooms horizontally and vertically resulting in internally poor visual amenity from the sole window in each room.
- 2) The proposal does not adequately address the significance of Redfern as a meeting place and centre for Aboriginal urban life in the uses proposed for the site and the architectural response or in a meaningful integration of public artworks.
- 3) The proposal provides minimal employment enhancement post construction. There is a Significant reduction in employment uses and mix proposed when compared to the most recent approval granted under SSD 7064 with:
 - a. The hotel use completely removed;
 - b. A significant reduction of ground floor retail from 0.68:1 to 0.09:1;
 - c. The apartment use removed; and
 - d. Residential use increased from 1.2:1 to 3.37:1 for boarding house exclusive use.
- 4) The proposal presents contextually as a scheme with excessive scale and bulk which does not relate well to adjacent built form. The proposal exceeds the scale and bulk of surrounding development presenting as a majority 6-storey built form

with a substantially sunken ground level and is a minimum 1-3 storey exceedance over the neighbouring context. Further, the proposal presents minimal contextual response provided to adjacent neighbours regarding modifying the scale and bulk to better relate. The step-in form on the west elevation to align with the adjacent neighbour is minimal. The east does not relate well to the neighbour. Additionally, multiple projections over the boundary for balconies and hoods exacerbate the scale and bulk.

- 5) The public domain interfaces proposed provide limited passive surveillance opportunities to improve the safety and security of the surrounding streets.
- 6) The proposed provision of open space includes a poor amenity offering at ground level. The rooftop provision of open space could be high amenity however it further exacerbates the scale and bulk overall due to the height in storey exceedance.

In light of the above, City staff recommend that the application is amended in order to comply with the Height and FSR development standards. At a minimum, the requirement to provide no more than a maximum residential FSR of 1:1 should be adhered to.

Further, it is noted that the proposed changes contained in the new Housing SEPP restrict any bonus floor space awarded to boarding houses to only those managed by Community Housing Providers. The City questions whether a boarding house of this type, with no indication that a genuine public benefit by way of the provision of affordable housing on site, should be awarded any further floor space bonus.

2 Design Excellence and Urban Design

As noted above, the City is not satisfied that the current proposal satisfactorily meets the provisions for design excellence in clause 22 of part 3 of the State Environmental Planning Policy (State Significant Precincts) 2005. The proposal does not adequately meet the design excellence requirements in subclauses 2(a), (b) and (c) as:

- The proposal does not demonstrate a high standard of architectural design and detailing. This overarching requirement is not met as cumulatively the combination of issues identified results in the proposal not achieving a high standard of architectural design.
- The proposal does not demonstrate that the form and external appearance will improve the quality and amenity of the public domain. The form is excessive in scale and bulk, does not relate well to neighbouring development and relies upon projections beyond the boundary to achieve some level of architectural articulation.
- The proposal does not meet the required sustainable design principles by proposing poor amenity to rooms in terms of visual and acoustic privacy, natural ventilation, and sunlight.

Based on the proposals excessive scale and bulk, increase in height above the permissible maximum storeys, poor contextual interface to neighbours, and compromised amenity outcomes to residents, the City believes that the site cannot comfortably accommodate residential uses in its current form. The bonus FSR provision available under the Affordable Rental Housing SEPP further exacerbates these noted concerns. Consideration of a commercial floor space scheme is strongly recommended. This would likely achieve:

- Better alignment with the objectives of the zone in the SEPP State Significant Precincts 2005.
- Better alignment with the land use and design concepts of the Redfern-Waterloo Built Environment Plan August 2006.
- A more easily accommodated maximised FSR as the central courtyard would not be needed to achieve a high daylight amenity plate if a central core were used
- Compliance with the height in storeys control.
- Opportunities for reduced scale & bulk at neighbouring interfaces.
- Opportunities for an architectural articulation zone which is not reliant upon overhanging the boundary.
- No pressure for the roof to be habitable space.
- Improved public domain interface outcomes.

2.1 Bulk and scale

In regard to the excessive bulk and scale of the current proposal, it is recommended that the design be amended to achieve the maximum permissible height in storeys with a ground level that relates to the public domain and a floor to floor height suitable for adaptation for future flexibility. As guides the Apartment Design Guide (ADG) part 4C figure 4C-1 recommends cafes are provided with a floor to floor height of approximately 4.2-4.3m and Section 4.2.1.2 of the Sydney Development Control Plan 2012 requires a 4.5m floor to floor for ground level commercial/retail uses.

Further, reduced bulk is recommended to both neighbouring interfaces to better relate to existing built form patterns in the streetscape. This could be achieved by a combination of upper level street setbacks which relate to the neighbours and modulated building mass to both interfaces similar to, but increased in size, from that proposed to the west elevation.

2.2 Public domain interface

The City notes the following design issues with the current proposal that results in an unsuitable public domain interface:

- The entry and café both rely upon access from secondary streets with minimal address or activation proposed to Cleveland Street. The floor level at ground level is subterranean with high level internal windows to Cleveland Street.
- The east facade on Woodburn Street is primarily a blank facade with service grills and fire exits interfacing the public domain. There is a small glazed lobby entrance on the north east corner.
- The north facade on Cleveland Street is similar with a majority blank facade with security bars over small windows. There is a small glazed lobby entrance on the north east corner and a small glazed cafe entrance via Eveleigh Street.
- The west facade on Eveleigh Street is primarily services, vehicle access and fire exits interfacing the public domain. There is a small glazed café entrance to the north west corner. The gated ground level pedestrian entry is directly adjacent vehicle access.

The public domain interfaces proposed do not demonstrate design excellence and provide limited passive surveillance opportunities to improve the safety and security of the surrounding streets. Design amendments are recommended to better address street interaction and activation and include:

- Providing internal floor levels that relate to the public domain.
- Increasing windows for passive surveillance and minimised blank frontages.
- Minimising services and integrating them into the overall design with high-quality finishes
- Locating pedestrian entries aware from vehicle entries

2.3 Building expression

The City notes the following building expression design issues with the current proposal:

- The corner balconies offer little utility on Cleveland street given the hostile environment. Vertical bars further impact on their amenity and presentation. Balconies are better located to rooms on Eveleigh and Woodburn Streets.
- The level 1 windows are heavily fortified with screens to achieve privacy to rooms – yet this results in an unfriendly interface with the public domain. Privacy needs to be balanced with positively interacting with the street.
- The proposal reads as heavy and homogenous due to the maximised envelope with minimal depth and articulation of the external wall, instead relying upon projecting elements to feign depth.
- Level 6 and 7 shade structures add unnecessary bulk due to the location, construction and materiality.
- Large windows with no external shading to north & west facing rooms will result in poor amenity for residents

The following advice is provided to be consider in any design amendments:

- Usable balconies should be relocated from the Cleveland Street to Eveleigh and Woodburn Streets. This would also assist reducing the bulk at the Cleveland Street corners. The corners of Cleveland Street are then recommended to incorporate windows.
- Level 1 windows are recommended to incorporate low solid metal sills with highly operable external screens to enable both user control and improved transparency adjacent the public domain.
- Greater articulation and three-dimensional modelling of the external facades are recommended. In addition, all windows are to be set to the back to the inside face of external walls.
- Any roof top structures are to be set well back from the perimeter and designed as framed lightweight and visually permeable canopies – not solid soffits.
- External operable shading is recommended to north and west facing rooms with large expanses of glass for occupant amenity and comfort.

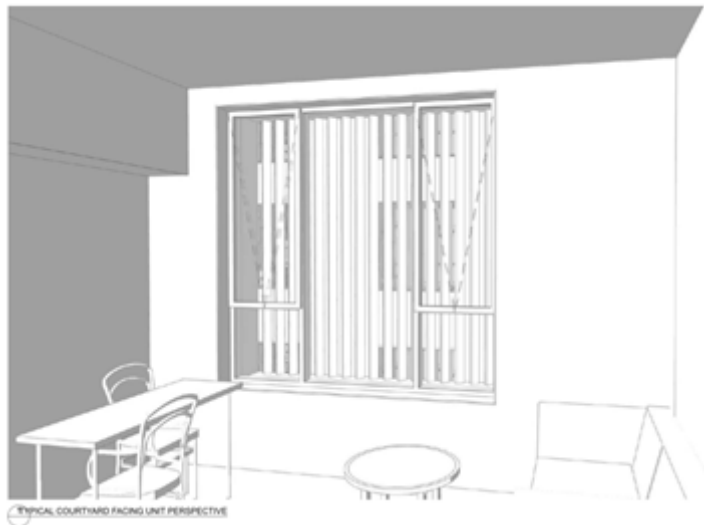
3 Social Impacts

Overall, the City notes that the submitted Social Impact Assessment (SIA) was fairly high level and did not really address potential social impacts of the development. No consultation was undertaken with nearby neighbours however, the SIA states that the pre-DA advice was “comprehensive and did not require further consultation”. The City expects for boarding houses of this size to undertake consultation with neighbouring property owners separate to formal exhibition during the assessment of the application and clarification is sought as to why this was not completed. Further, it is noted that the SIA highlights The Block’s history but misses the significance of the site for Aboriginal people both as a site of self-determination and asserting human rights.

4 Residential Amenity

As discussed above, the City is not satisfied that the proposal exhibits design excellence and fails to meet the required sustainable design principles by proposing poor amenity to rooms in terms of visual and acoustic privacy, natural ventilation, and solar access. Each area of amenity concern is discussed below:

- **Visual and Acoustic Privacy:** The small courtyard provides the only outlook for 47 rooms: 11 rooms per floor on L1/L2, 10 rooms per floor L3/L4, 5 for L5. The multiple visual and acoustic privacy issues this layout creates horizontally and vertically combined with the lack of any sun for 38 of these rooms mid-winter results in poor residential amenity. The reliance upon privacy screening may mitigate some visual privacy concerns, but not acoustic, and comes at the expense of outlook amenity from each of the rooms only window and shown in a submitted perspective drawing (below) accompanying the application.



- **Solar access:** The proponent states that compliant solar access to proposed boarding rooms is 60% however, only 66 of the proposed 122 rooms can receive solar access and is at 55%. This 55% figure is also questioned as those rooms in the courtyard which are stated as achieving 2 hours all include vertical screens for privacy which would limit solar access if not operable.
- **Natural Cross Ventilation:** Drawings provided with the application (DA9006) state there is cross venting of rooms into corridors however, no fanlights are proposed over entry doors and the corridors that any fanlight could vent into are predominantly enclosed offering minimal ventilation opportunities. Venting above doors would also create cumulative acoustic impacts to residents given the

double loaded nature of the planning and have not been adequately addressed in the application.

- Room Amenity: Multiple room types are so small that there is insufficient circulation around beds. This is poor amenity particularly for double rooms where 2 residents are intended to share the bed.
- Acoustic amenity and ventilation: No details have been included in the current application demonstrating how noise affected facades can achieve both acoustic attenuation and natural ventilation simultaneously. The submitted acoustic report has highlighted that when windows are open some of the boarding house rooms will not achieve compliance with Clause 102 of SEPP (Infrastructure) 2007 and that natural ventilation is to be provided in accordance with the BCA and AS1668.

Details of proposed natural ventilation to be incorporated into the design when windows are closed must show compliance with City of Sydney Development Control Plan 2021, SEPP infrastructure 2007 and Department of Planning guideline - Development Near Rail Corridors and Busy roads. Further, attenuation measures for the roof top plant must be designed prior to approval due to residents being located on either side of the development and attenuation measures checked for compliance with the NPFI at CC and OC stage.

- Further amenity issues include:
 - excessively narrow rooms (type D) with a 2.75m internal width
 - rooms that rely upon snorkel windows for frontage (type E)
 - heavily compromised planning to rooms (type F) where there is nowhere to sit due to the amount of unusable circulation
 - internal corners with multiple visual and acoustic privacy issues (type B, E & F)

Overall, in order for the proposal to achieve the design excellence provisions, significant design modifications are required to improve amenity outcomes for any future resident. Some recommended design modifications include but are not limited to the following:

- The size of the courtyard is to be increased to improve the amenity of rooms reliant on this aspect (a 12m separation as per the ADG is recommended).
- The courtyard is to be designed to receive some sunlight mid-winter.
- Operable external privacy treatments are recommended to courtyard rooms to enable user-controlled privacy and solar access to those rooms that can receive it.
- Alternative attenuated ventilation to noise affected facades is recommended in addition to requiring all windows have an operable element for purge ventilation.
- Increased room frontages are recommended to enable some room layout flexibility & circulation around beds – type D, E and F layouts are not supported.
- All rooms are to meet the minimum ARH SEPP area requirements which accurately factor in allowances for kitchens including circulation where it is not part of essential room circulation.

5 Land contamination

A Detailed Environmental Site Investigation (DESI) and Remediation Action Plan (RAP) have been prepared but have not been submitted with this application. The RAP has not been peer reviewed by a NSW EPA Accredited Site Auditor and does not include a Section B Site Audit Statement or letter of interim advice issued by that auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.

A section B Site Audit Statement or letter of Interim advice is recommended to be obtained from a NSW EPA Accredited Site Auditor certifying that the RAP is practical and the site will be suitable after being remediated in accordance with the requirements of the submitted RAP.

6 ESD

The City wishes to highlight several discrepancies and issues with the application regarding ESD initiatives in the proposed development.

Firstly, the submitted ESD Statement has nominated the building as being 1 storey, thus having an Energy Target at 45 however, if is properly described as 6 storeys above ground, the BASIX Target would fall to 25. Although it is noted that the current proposal complies with the target of 45, the application includes nothing of note regarding building design for environmental performance. Further, the BASIX Water score has been achieved by specifying water efficient shower heads being 4 Star and 6.5 litres per min or less however the BASIX annotation on the plan only states 4 Star and must include details relating to litres per minute.

The non-provision of any on-site energy generation is a key lost opportunity for this development. This scale of building lends itself to photovoltaics to provide some onsite energy generation for onsite use (e.g. common areas) however the proposal includes no details regarding this matter. Further, it is recommended that the proponent reconsiders the use of gas for hot water and instead consider heat-pump hot water as a renewable energy alternative. There are recent examples of this technology being use in a new 7-storey social housing development being undertaken by the NSW Department of Communities. Heat pump for hot water is particularly logical as a carbon abatement initiative if photovoltaics are not available.

The submitted ESD statement further states “Sustainability has been integrated into the heart of this development with careful consideration given to sustainable outcomes from the initial siting, massing and orientation of the building. In addition to these core features, this project has included wide ranging initiatives to ensure the building is a healthy, energy and water efficient building with a minimal ecological footprint”. The City does not agree with this statement noting that no effort has been made above achieving base compliance while there are no wide-ranging initiatives for energy or water efficiency.

The City is not satisfied that the application satisfactorily addresses the SEARs in regard to ESD initiatives. More specifically:

- The application only meets base compliance and does not demonstrate how the future building will exceed the relevant industry recognised building sustainability and environmental performance standards

- The proposal does not demonstrate how the proposal incorporates measures to minimise carbon emissions, reflecting the Government's goal of net zero emissions by 2050, particularly as gas hot water locks in a building to using fossil fuels for 20-30 years.
- The proposal does not discuss the consumption of resources, water (including through water sensitive urban design) except for the use of efficient shower heads. No on-site stormwater capture or re-use methods have been proposed.
- The application does not identify or assess additional design measures to further improve the environmental performance of the development, such as measures to reduce carbon emissions during construction
- The inclusion of building-integrated photovoltaics (BiPV), green roofs and walls, rainwater or stormwater harvesting measures and waste reduction and recycling measures has been largely ignored in the current proposal.
- Little effort had been made to identify and assess additional design measures to further improve the environmental performance of the development, such as rainwater or stormwater harvesting.
- The application does not discuss waste reduction and recycling measures beyond base compliance.

7 Public Domain

The City raises the following matters for your consideration in relation to proposed works affecting the public domain.

7.1 Public Domain Levels and Gradients

The existing footway area along Woodburn Street shows existing steps within footpath. Any future works should include the removal of these steps and reconstruct the footway area to new levels. This will result in any new entryway to be redesigned to match new footway levels. Removal of these steps and reconstruction of footway area will include realignment of utility services such as re-adjustments of existing power pole and Telstra pit on Woodburn Street.

As such, a Public Domain Levels and Gradients document is recommended to be submitted for review and approval with the application. The submission is to include cross sections through driveways and building entrances from inside the building to the centreline of the road carriageway. Existing and proposed boundary levels, top of kerb levels and invert of gutter levels are to be clearly shown. Further, longitudinal sections showing existing and proposed boundary levels, top of kerb levels and invert of gutter levels on the same longitudinal section are also required for each frontage.

The submission is to demonstrate that public domain levels and gradients on all site frontages are in accordance with the City's Public Domain Manual or will be reconstructed and that proposed floor levels, particularly at building entrances and driveways have taken into consideration finished public domain levels. Any level changes required to satisfy DDA and flood planning requirements are to be resolved within the property boundary.

7.2 Encroachment in public domain

The proposed Juliette balconies overhanging public domain in Eveleigh Street are not supported. All balconies must be contained wholly within the property boundaries.

7.3 Kerb Extension

The proposal shown in the Landscape Concept Plan is not fully coordinated with the architectural plans. The indicated kerb extension at the corner of Cleveland Street and Eveleigh Street needs to be further clarified. If it is the proponent's intent, further detail will be required for review and for separate Local Pedestrian, Cycling and Traffic Calming Committee approval.

7.4 Elevations

Elevations and floor plans, especially ground floor, must include footway features to show transition from public roads.

7.5 Vehicular Entry Ramp

Architectural drawings must provide a cross section along proposed vehicular crossing and basement ramp entry. This section is also to include ceiling levels as well to show clearances.

8 Landscaping

A review of the submitted landscape plans was undertaken and the City notes that the proposed landscaping in and around the site will not provide 15% canopy cover as recommended in the Sydney Development Control Plan 2012. Further matters relating to street tree management and site landscaping are discussed below.

8.1 Street Trees

The City notes the existence of two street trees along Cleveland Street that must be retained and protected as a result of any development on site. Pruning of these trees are not permitted without obtaining prior consent from the City. It is recommended that any proposed awning, equipment and/ or temporary structures (hoarding, scaffolding, piling rigging etc.) are designed and installed without requiring the removal of branches. There must be adequate setbacks from proposed street furniture including awnings to allow street trees to grow without restriction.

Further, the proposed location and spacing of the new street trees on Cleveland Street is inappropriate. *Lophostemon confertus* (Brush Box) trees require a minimum of 10-15 metres spacing to allow for their mature canopies to grow without conflicting with each other. Brush Box trees have a mature height and canopy spread of approximately 17m x 10m.

Additionally, the proposed *Elaeocarpus reticulatus* (Blueberry Ash) species on Eveleigh Street is not in accordance with the City's Street Tree Master Plan 2011 (STMP) which is *Angophora costata* (Smooth-barked Apple). Furthermore, the spacing of 8 metres for Blueberry Ash trees is excessive, their mature canopies reach a mature width of approximately 4 meters. Although Woodburn Street is not shown on the City's STMP 2011, the proposed Blueberry Ash trees located along

the street are space 7 and 8 metres apart however, similar to the above, such spacing is excessive for the species. Based on other medium sized street trees in the area (e.g. Chippen Street) *Pistacia chinensis* (Pistachio) is more common and is a more suitable species for Woodburn Street.

The City further notes that the plans indicate four bollards around each street tree, this not in accordance with the City's STMP 2011 and is not supported and are recommended to be removed from landscape plans.

8.2 Site Landscaping

The application proposal substantial planting on the upper levels. The architectural sections indicate that adequate soil depths will be provided, however some of the planters are too wide to maintain from standing within the accessible terraces. Additionally, some planters are beyond the perimeter and will need specialist safety equipment to maintain. Should planters be pursued, a statement and/or diagram indicating how all planting at height, on each level, will be safely accessed for maintenance should be prepared and submitted for further consideration. Further, it is recommended that a detailed section of some of the upper-level planters be submitted to assist in understanding the landscape scheme to the roof levels.

In regard to the rooftop level landscaping proposal, the City notes the inclusion of a communal garden but with no supporting facilities. To ensure its function, it is recommended that the garden be supported by storage for tools, composting and green waste, a water source (tap) and so on. Additionally, seating is always a welcome aspect to a working garden and should be considered here.

The City also notes the proposal of synthetic grass to the uppermost level. This material is generally not supported as it can heat up to excessive temperatures in direct sun, and often ends up in landfill. An alternative, more durable surface material such as decking, or paving is recommended.

Further, it is recommended that any future landscape plan be drawn to scale, drawn by a qualified landscape architect or landscape designer and should include the following:

- Tree Protection Zones, Structural Root Zones and existing canopy spread of existing street trees;
- Details of earthworks and soil depths including mounding and retaining walls and planter boxes (if applicable).
- Location, numbers, type and supply of plant species, with reference to the relevant Australian Standard;
- All new trees must be grown to Australian Standard 2303:2015 'Tree stock for landscape use'
- Details of planting procedure and maintenance;
- Details of drainage, waterproofing and watering systems.
- Details specifying the percentage of canopy coverage that will be achieved in 10 years from completion provided by the trees within the site (show on scaled plan). The canopy coverage from street trees within Council land (public land) does not contribute towards the canopy provided from the site (private land).

9 Car and Bicycle Parking

Bicycle parking on site is not sufficient and should be increased. The City recommends a minimum of 120 bicycle spaces (1 per room) be provided on site rather than the proposed 27 spaces (1 per 5 rooms). Further, given the location of the site being well serviced by public transport, it is strongly recommended that car parking be reduced as much as possible. Any parking provided must be prioritised for loading and bicycle parking. Any space available after the provision of adequate loading and bicycle parking should then be provided as car share parking spaces.

10 Servicing, Waste and Access

The City does not support any on-street waste collection. All servicing of the site must be accommodated wholly within the site and appropriate design arrangements must be made to ensure all entry and exit to the site is done in a forward direction and that loading and servicing areas are able to allow entry to Council's waste collection vehicles (9.25m in length and 4m height clearance).

Further advice regarding access is provided below:

- Vehicle access for collection and loading is provide a minimum vertical clearance of 4.0 metres clear of all ducts, pipes and other services and must provide allowance for the use of a 9.25m Council garbage truck.
- Collection vehicles to be able to enter and exit the premises in a forward direction. Where a vehicle turntable is necessary to meet this requirement, it is to have a capacity of 30 tonnes.
- Maximum grades of 1:20 for the first 6m from the street, then a maximum of 1:8 with a transition of 1:12 for 4m at the lower end; a minimum driveway width of 3.6m; and a minimum turning circle radius of 10.5m.
- Where vehicle access is via a ramp, design requirements for the gradient, surface treatment and curved sections are critical and must be analysed at an early stage in the design process.

Regarding waste storage and collection, further amendments and additional information must be provided. Please see the advice below:

- Waste collection and loading is to be onsite, in accordance with the City of Sydney's Guidelines for Waste Management in New Developments 2018 (the Guidelines) and accommodated wholly within new development.
- The waste collection and loading point is to be designed to allow waste collection and loading operations to occur on a level surface away from vehicle ramps; and provide sufficient side and vertical clearance to allow the lifting arc for automated bin lifters to remain clear of any walls or ceilings and all ducts, pipes and other services.
- Identify the bin carting path to the collection point. The maximum travel distance between the storage points and to collection points for all waste and recycling bins and bulky waste shall be no more than 10 metres.
- Movement of bins and bulky waste to and from the waste storage area (WSA) or the collection point is to be level, free of steps/stairs, avoid the kerb and does not exceed a grade of 1:14 at any point.
- Provide council collection vehicle swept paths.

- Food waste must be stored separately to general waste and in bins no larger than 240L. This is to be shown for the boarding house and the commercial development.

Conclusion

Based on the supporting documentation provided, the application is not supported and the City is unable to recommend conditions of consent in relation to the proposal at this time.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Senior Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport