

12373
20 November 2012

Sam Haddad
Director General
Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Karen Jones

Dear Karen

**REQUEST FOR DIRECTOR GENERAL'S REQUIREMENTS
BLOCK 4S CENTRAL PARK**

We write to you on behalf of Central Park JV No 2 requesting that the Director General issue his requirements for the preparation of an Environmental Impact Statement (EIS) to accompany a State Significant Development Application (SSD DA) for the proposed development of Block 4a 'South' (Block 4S) of Central Park (formerly known as Frasers Broadway) for student accommodation.

The request provides details of the site's location, an outline of the project, its background, and identifies the key environmental and planning issues that are likely to be associated with the proposal.

1.0 SITE DESCRIPTION

Central Park is located on the southern edge of the Sydney Central Business District (CBD). As shown in **Figure 1**, the site is in close proximity to Central Station, Broadway Shopping Centre, the University of Technology, Sydney and the University of Notre Dame.

Block 4S is located on the western boundary of the Central Park site and is bounded by Block 4a 'North' (Block 4 N) to the north, Central Park Avenue and Block 4B (the Brewery Precinct) to the east, Irving Street to the south and Abercrombie Street to the west. The location of Block 4S within the Central Park site is shown at **Figure 2** below.



Figure 1 – Location Plan

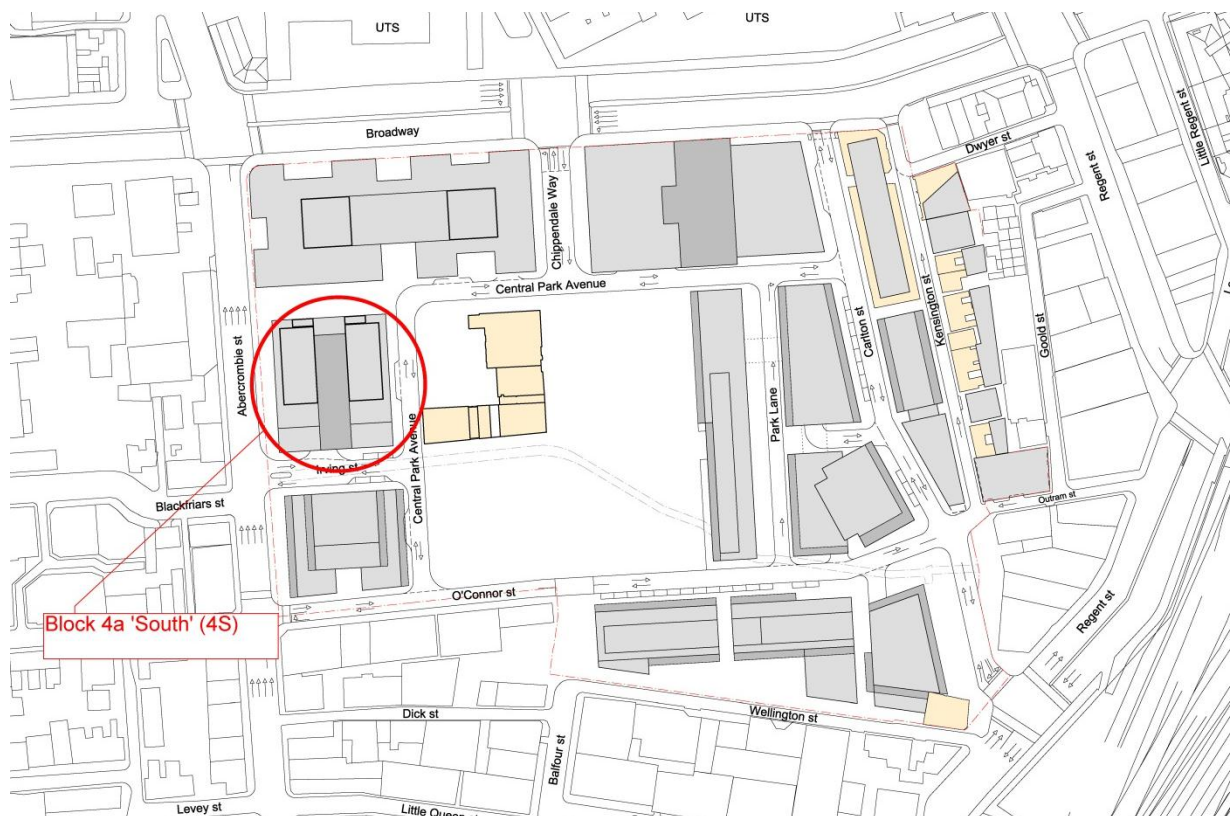


Figure 2 –Location of Block 4S within the Central Park Site.

2.0 THE PROJECT

Block 4S was previously approved for commercial development as part of the Project Application for Blocks 1 and 4 (MP08_0253). However, due to a range of economic factors, it has become apparent that the development of the whole of Blocks 1 and 4 for commercial purposes is unviable. Further, there is significant demand for student accommodation in the locality.

As a result, the SSD DA will seek approval for the redevelopment of Block 4S as student accommodation with associated non-residential uses and retail on the ground floor. The application will be accompanied by two concurrent modification applications to facilitate the development. These include:

- An application to modify the Concept Plan (MP 06_0171) to enable the proposed amendments to the building envelope, and the use of Block 1 and 4 for student accommodation / residential purposes, which will result in a subsequent change to the Concept Plan approved residential / non-residential split.
- An application to modify the Block 1 and 4 Project Application (MP 08_0253) to excise Block 4S, to enable the proposed development to take place independently of Blocks 4N and 1.

The scheme will be designed by the original architects for Blocks 1 and 4, being Forster + Partners in associated with local architect Nettleton Tribe. The proposed envelope for Block 4S is shown at **Figure 3**. Block 4S will be built to a maximum height of RL71.5 AHD (including plant)

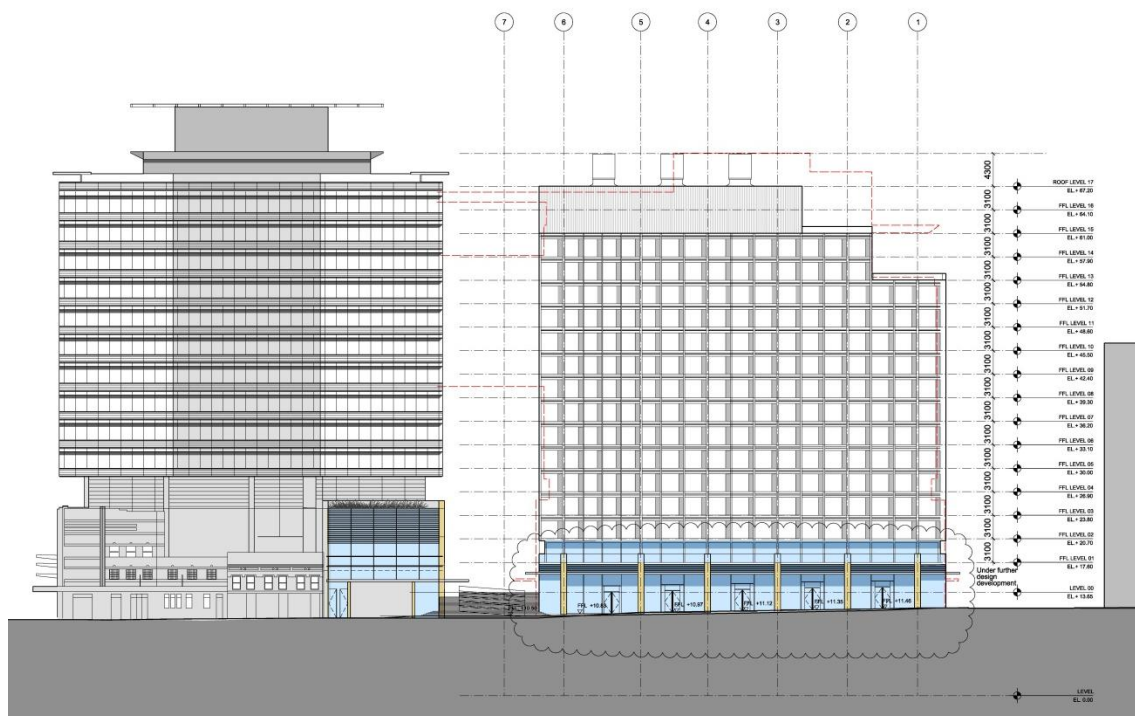


Figure 3 – Elevation illustrating the massing of Block 4S in relation to Block 4N

Blocks 1 and 4 (including the Brewery Precinct) have an approved GFA of 77,000m² which is to be made up entirely of non-residential uses. The proposed Block 4S development will have a GFA of approximately 24,700m². Whilst the ground floor of the proposed development will be used for retail uses to activate the street frontages of Abercrombie, Central Park Avenue and Irving Streets, the use of the upper levels as student housing (classified as Class 3 Boarding House) will require the concurrent modification to the Concept Plan as outline above.

3.0 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Under Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) development on the Central Park site with a capital investment value (CIV) of more than \$10 million is identified as State Significant Development (SSD). As the proposed development of Block 4S will have a CIV of approximately \$71,453,000 the proposal is classified as SSD.

4.0 RELEVANT PLANNING ISSUES TO GUIDE THE DGRS

The environmental planning issues that are proposed to be addressed in the EIS are outlined below to assist the Department and Director-General in identifying the Environmental Assessment Requirements for the project.

The key environmental planning considerations associated with the proposed development are as follows:

- Compliance with relevant Environmental Planning Instruments;
- Compliance with the Central Park Concept Plan and other Project Applications;
- Urban Design and Built Form;
- Student Housing Amenity;
- Overshadowing;
- Traffic, Access and Parking;
- Public Domain and Landscaping;
- Acoustic Impacts;
- Accessibility;
- Environmental Sustainability;
- Operational Management;
- Services Plan and Details;
- Building Code of Australia and Fire Safety;
- Construction Management;
- Waste Management; and
- Community Consultation.

These are discussed in more detail in the following sections.

4.1 Compliance with relevant Environmental Planning Instruments

The following Environmental Planning Instruments and policies will be relevant to the assessment of the proposed development:

- Objects of the *Environmental Planning and Assessment Act 1979*
- Metropolitan Strategy 2036;
- Metropolitan Transport Plan 2010;
- Draft Sydney City Subregional Strategy;
- State Environmental Planning Policy 55 - Remediation of Land;

- State Environmental Planning Policy 65 - Design Quality of Residential Flat Development and Residential Flat Design Code (Planning NSW) 2004;
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy 64 - Advertising and Signage;
- Sydney Local Environmental Plan 2005;
- Draft Sydney Local Environmental Plan 2011;
- Metropolitan Transport Plan 2010;
- Development Near Rail Corridors and Busy Roads - Interim Guideline; and
- Planning Guidelines for Walking and Cycling.

The EIS will provide an assessment of the proposed development against the above instruments and policies and will provide justification for any variations proposed (if applicable).

It is noted that remediation of the site has been resolved under a previous application (MP07_0163) and as such State Environmental Planning Policy 55 – Remediation of Land will not be a matter for consideration in this assessment.

4.2 Compliance with the Central Park Concept Plan and other Relevant project

Applications

As noted above, the proposal will require a concurrent modification to the approved Concept Plan to enable residential development on Block 4S, to alter the approved residential / non-residential mix across the Central Park site and to modify the Concept Plan approved envelope.

The EIS will provide an assessment of the proposed development against the Central Park Concept Plan as proposed to be amended, the conditions of consent and to Statement of Commitments.

4.3 Urban Design and Built Form

The EIS will include an assessment of the proposed building design and will outline how the proposed building achieves design excellence. An architectural design statement prepared by the architects will also be submitted explaining the design principles of the building, and design responses to development on Block 4N and the Abercrombie Street streetscape.

4.4 Overshadowing

The EIS will include shadow diagrams which show the shadowing impacts of the proposed building. The EIS will also provide an analysis of the shadows of the proposed development and that of the amended Concept Plan envelope.

4.5 Public Domain and Landscaping

A Public Domain Plan will be submitted with the SSD DA providing details of publicly accessible areas and finishes. The plan will be consistent with the overarching Public Domain Strategy approved as part of the Concept Plan.

4.6 Traffic, Access and Parking

A Traffic and Parking Statement will accompany the application which will confirm compliance with the existing parking provision for Blocks 1 and 4, and that sufficient parking and servicing facilities are available for the proposed development.

4.7 Waste Management

A Waste Management Plan will be prepared as part of the EIS. The plan will indicate the collection points and method of removal for Block 4S as well as the different uses. The report will include details of the waste storage and collection arrangements for the retail uses and student accommodation.

4.8 Noise

A Noise Management Plan will be prepared as part of the EIS. Consideration of the noise impacts from the commercial development to the north on Block 4N and traffic noise surrounding streets will be taken into account. The potential noise impacts created by the proposed development will also be considered in the EIS, in particular the management of outdoor communal areas.

4.9 Accessibility

The proposed development will be designed to provide universal access to all publicly accessible areas and will provide accessible accommodation in accordance with the City of Sydney Access DCP. An access statement prepared by a qualified accessibility consultant will accompany the EIS.

4.10 ESD

An ESD report will accompany the application to confirm that the building meets the high level of sustainable design performance expected of a building with a 5 Star Green Star rating. It is noted that project will be ineligible to be rated under Green Star due to the proposed use, however a principles led pathway is being applied, consistent with other student accommodation developments on the site.

4.11 Plans of Management

An Operational Plan of Management (POM) will be completed for the operation of the student accommodation. This POM will form part of the EIS and will provide details in relation to maximum occupancy, on-site management, use of communal areas, facilities and the like.

4.12 Services Plan and Details

Information on the proposed site services will be provided which will confirm that the existing site services can be suitably augmented to accommodate the proposed development.

4.13 BCA Report

The EIS will include a BCA Report for the existing buildings on the site with regards to the alterations and additions proposed, confirming that they can or do comply with the relevant provisions of the BCA.

4.14 Construction Management

A preliminary Construction and Environmental Management Plan will be submitted with the application outlining the key management measures to be implemented during construction of the proposed development.

4.15 Community Consultation

The EIS will document consultation undertaken during the preparation of the application.

5.0 CONCLUSION

The purpose of this letter is to seek the Director General's Requirements for the preparation of an Environmental Impact Statement for the proposed student accommodation and ground floor retail uses on Block 4S, Central Park. It includes a description of the proposed development and an

outline of what are considered to be the key issues for the assessment of the State Significant Development Application.

We trust that this overview of the proposal is sufficient for Director General to issue his requirements for the preparation of the necessary Environmental Impact Statement. Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or gkirkby@jbaplanning.com.au.

Yours faithfully

A handwritten signature in blue ink, reading "Gordon Kirkby". The signature is fluid and cursive, with the first name "Gordon" and the last name "Kirkby" clearly distinguishable.

Gordon Kirkby
Director

Attachments:

- Indicative floor plans and elevations prepared by Foster + Partners and Nettleton Tribe
- Construction cost statement prepared by Altus Page Kirkland