

Blocks 1+ 4, Block 4S and Concept Plan Mod 8 - Response to Submissions

Public Submissions

Issues Raised by the Community / Public Submissions	Proponent Response
Ann Young	
The location of the site is subject to traffic noise. The design of the buildings will contribute to traffic noise through to the communal open space and park areas.	The design of the proposed built form is consistent with the approved concept plan envelopes. The location of the communal open space within the site is considered to be suitably separated from surrounding major roadways to mitigate against potential noise impacts.
The southern boundary of the site is open to cold winds and will encourage a flow through of these winds by opening up the north facade making Chippendale green cold in winter. Reconsideration of the 'gap' between the buildings	The build form is consistent with the footprint of the approved concept plan envelope.
Standardised Submission	
The approval of Concept Plan raised considerable public comment at the time and was approved on the basis of a minimum 30% commercial use. The proposed change from commercial use to student housing is an intensification of the use and significant departure from previous representations. The current proposal is not supported.	<p>The proposed amendment to the concept plan is largely driven by the identification of a high demand for student accommodation and residential in the area of the site.</p> <p>As demonstrated in the Response to Submissions for the Block 1 and 4N modification (MP 08_0253 MOD 4), the proposed change can occur with limited impacts, and a number of benefits. In summary:</p> <ul style="list-style-type: none"> a residential scheme could be accommodated within the approved (or potentially smaller) building envelopes; due to the requirements of SEPP 65 and the need to provide residential amenity, the residential Block 1 envelope would potentially be narrower than the commercial envelope, with greater setbacks from Block 2 and Block 4N, and the potential for separation at the ground level; the redevelopment of Block 1 for residential purposes would enhance public amenity through more solar access to the Brewery Yard forecourt and Chippendale Green; should Block 1 become residential it would ensure the full open through link between Central Park Avenue and Broadway; the proposed modification would not result in any adverse traffic or parking impacts; and residential uses would be separate from commercial uses, and so there would be no impact on commercial operation. <p>The modification to the Concept Plan allows the precinct to be developed sooner, therefore reducing the extent of construction noise, traffic and dust.</p> <p>Further, when considered in conjunction with the other approved and proposed uses across the Central Park site (including the retail / shopping centre on the lower levels of Block 2, the recently approved hotel on Block 3A, two childcare facilities intended for Block 4N and Block 11, student accommodation developments in the Kensington Precinct and Block 4S, commercial uses in Block 4N and a variety of commercial and retail uses in the Kensington Street precinct) there will continue to be a vibrant mix of uses across the site.</p>
SEPP 65 controls are intended to ensure appropriate design and residential amenity is achieved. The proponent is seeking approval on the basis of boarding house controls and suggesting that some key provisions under SEPP 65 do not need to be met. Given most students will live here for 6 - 12 months it is unreasonable to provide substandard accommodation. SEPP 65 controls should apply. Likewise the suggestion that full-time students do not require the same residential amenity is inappropriate - as they are	<p>The principles of SEPP 65 and rules of thumb within the RFDC have been adopted within the Block 4S proposal where possible. Importantly, the provisions of amenity within the units, as well as in the numerous areas of communal internal and external space have been a focus of the proposed design.</p> <p>Furthermore, within the Block 4S proposal are a number of key facilities that would not ordinarily be provided within a residential flat building including a gym, study rooms, communal dining and recreation space, cinema and lounge areas on ever second level of the building.</p>

typically are at "home" longer than residents who work full-time.	Room sizes and dimensions, exceed those provided within the Sydney DCP and Affordable Rental Housing SEPP.
<p>The size and scale of the student accommodation is inappropriate. Student housing has already been approved for Blocks 3B, 3C and 10 on Central Park. A number of other student housing blocks have been approved in recent years - Regent Street, Harris Street, Quay Street, Cleveland Street, Wattle Street and the Block. As such there is already a very high volume of student housing in the immediate area. In addition, Chippendale has a high volume of low cost shared housing. The argument that students move from low cost housing to much higher cost student housing blocks is not reliable.</p> <p>Significantly, Chippendale has one of Sydney's highest transient populations. This brings with it some inherent challenges. The proposal to add another 826 beds in the immediate area is too high and will have a corresponding impact on local amenity. Chippendale already has a drastic shortage in open space and community facilities, which has not been addressed by the introduction of Chippendale Green. While the proposal may meet current market demand it fails to ensure Chippendale's longer term social sustainability.</p>	<p>The size and scale of the proposed development envelope is consistent with the Concept Plan Envelope. The provision of student accommodation is proposed to meet an identified demand in a well located area of Sydney.</p> <p>The proposal will contribute to the local economy, as discussed in the Economic Impact Assessment report which was submitted with the Concept Plan modification.</p>
The overall economic benefit does not benefit the existing nor incoming residential community. Other options should be properly considered in consultation with the existing community. A query is also raised, whether the criteria for the national affordable housing scheme can be met, if the housing is used for overseas students.	The project serves an acute shortage of housing the area. Introducing 826 students beds will assist to alleviate pressure on rents. The project meets the NRAS requirements.
The scale and design of the building has no relationship with historic St Benedict's. It will dominate the street frontage, is visually intrusive and detracts from one of the city's finest heritage buildings.	The proposed Block 4S building has been designed in accordance with a number of key items established within the Concept plan (particularly the Datum Line), and cognisant of the surrounding heritage buildings, including the Australia Hotel and St Benedict's Church. Additional information has been provided within the Block 4S RTS report regarding articulation of the facade.
The design report suggests environmental factors such as cross-ventilation were considered. This relies on open windows to achieve a cross flow. This means that recently introduced design standards in Sydney LEP 2012 are not met (intended to ensure residential amenity for new buildings on busy arterial roads).	The provision of operable windows within the proposal is standard for any apartment building within an inner city location. Cross flow ventilation can be suitably achieved within each unit, as demonstrated within the ESD report prepared by WSP (Appendix K of the Block 4S RTS). The internal amenity of the residents has also been considered in the acoustic report prepared by Acoustic Logic (Appendix H of the Block 4S RTS). The report concludes that the acoustic design of the project will be undertaken such that internal noise levels from environmental noise comply with criteria as detailed within the Australian Standard AS 2107:2000 and the Central Sydney DCP.
The proposed high volume student housing and introduction of be more than 40 + licensed venues across the site has the potential for a toxic mix. This has not been considered.	There is no correlation between the proposed student accommodation and the number of retail premises on the site. Further, it is noted that not all food premises will be used as licensed
Withheld submission	
I strongly object to the change in land use for Block 4S because it does not meet the relevant SEPP 65 guidelines and has a cumulative impact in terms of local residential amenity and social sustainability.	<p>Whilst the proposed student housing represents a Class 3 development, and SEPP 65 only applies to Class 2, the proposal has been designed in accordance with the principles of SEPP 65 with regard to the amenity of future residents as well as preserving the existing and future amenity of surrounding land uses.</p> <p>Additional details have been provided by Acoustic Logic (Appendix H of Block 4S) and within the revised Plan of Management (Appendix E of Block 4S) to appropriately mitigate acoustic impacts to surrounding residential land uses.</p>
In addition, I strongly object to the proposed changes to the Concept Plan to allow the changes to the land use for Block 1, should the proponent choose to do so.	The proposed Concept Plan modification seeks approval for the potential future use of Block 1 for either commercial or residential uses. The modification is proposed to provide flexibility to building Block 1 and 4N sooner, and the desire to achieve the Concept Plan objectives (refer to

	<p>Economic Impact Assessment).</p> <p>Should Block 1 be development for residential purposes, a new State Significant Development Application would be need to be submitted to the DPI. This would require public consultation, consultation with Council and assessment by the DPI. Furthermore, a proposed development for residential uses would be required to demonstrate consistency with the Concept Plan, as well as suitable levels of amenity for future residents (compliance with SEPP 65). The application will also be required to demonstrate that it will not result in any detrimental impacts to surrounding land uses or the future potential of surrounding land uses.</p>
Any change to the land use for Block 1 should go through a proper application process via a SSD ensuring that details are fully known and can be properly reviewed by the public. At that time a further modification can accompany the plan. To make a modification now to the overall residential/commercial mix without providing further detail, is distressing and quite contrary to the representations that were previously made.	The proposed modifications to the Concept Plan seek to provide the flexibility to enable Block 1 and the Brewery Yard to be developed for residential uses in the future. However, it is noted that any change of use would require the submission of either a Section 75W Modification Application (Brewery Yard) or a new SSD DA (Block 1) to the DP&I. These applications would further assess the impacts of the proposed use on the mix across the site, and would provide a detailed assessment of the likely environmental effects of the change.
The approval of the concept plan was made on the basis of a minimum of at least 30% commercial and residential use to ensure the best planning outcomes. The mix of transient population to fixed population in the area will be unreasonably disproportionate if these changes are allowed without proper consideration, not to mention the drain on resources and already limited outdoor space and parking as the proposed accommodation seems in most cases to be substandard in terms of light and other amenity.	<p>The proposal for student accommodation will meet a demand the presently exists in the area, reducing the stress on the existing rental market within the area and surrounds. The proposed development will not generate demand for additional students to the Universities and tertiary education facilities, rather, it will relieve existing pressure in the local rental marker and provide an alternative means of affordable accommodation to students.</p> <p>Furthermore, as part of the proposed design, communal facilities are provided within the student accommodation building that would not otherwise be provided within residential flat building. These facilities will help to minimise the demand for any significant additional burden on community facilities.</p>
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The proposal- to now further increase the density with student housing - creates a serious departure from the original plans as approved.	The proposal for student accommodation is proposed in accordance with the Concept plan amendment that has been submitted to the Department of Planning and Infrastructure (Mod 8).
With no disrespect to students (I was one once), a large concentration of student housing in the same area can not happen without some deleterious effect on the local community.	The proposed land uses are consistent with the mixed use nature of Central Park. The proposed student accommodation will meet an identified accommodation demand in a well located area of Sydney. The facility will be professionally operated and provide a number of recreation and study areas to meet student requirements.
Whilst the housing itself may be well-managed so as to prevent the worst of some student 'ghettos', such management has no control over student impact on the local community once they are off-site. Such negative impact is often most noticeable at night and weekends as students let their hair down"	The proposal will be managed by an independent commercial student housing provider. The use will be required to operate in accordance with the Plan of Management submitted to and approved by Council.
Student housing should be diversified and dispersed throughout the community, rather than creating huge concentrations on one site. The exiting approval for student accommodation elsewhere in the development must be taken into account when accessing this current modification application. There is already an excessive concentration (of student housing) approved and this proposed modification will lead to a gross excess.	The subject site is located within proximity of numerous tertiary education institutions. The proposal will provide accommodation to an identified sector of the rental/housing market that is in high demand relieving existing pressure on the existing rental market. The concentration of student accommodation is not considered to be excessive, and the design and operational model suits specific student requirements.
Most students require accommodation for several years - effectively permanent accommodation.	The proposal has been designed in accordance with the principles of SEPP 65. It is acknowledged by the DPI and Council that achieve of the rules of thumb of the RFDC, designed for residential flat buildings, is not appropriate or achievable for student housing.
Certainly this proposed building suggests it is not intended to be for temporary accommodation (say, 3-4 months). It appears to me that some of the amenity being	When considered against the City of Sydney DCP, and the State Environmental Planning Policy (AH SEPP), the proposal is consistent with the numeric requirements, room dimensions and amenity requirements. Furthermore, the proposed development provide significantly more communal

<p>provided such as sunlight provision and cross ventilation does not meet normal standards for permanent accommodation. To allow a building which is effectively substandard is gifting the developer with excess profits by cramming more people into a building with decreased standards. Even talk about "upmarket design" is totally subjective and can create a cosmetic impression which hides the real situation of inferior accommodation as above.</p>	<p>open space than is required under these provisions, along with numerous communal facilities not provided for comparable student accommodation.</p>
<p>Building 4N</p> <p>It seems that insufficient attention is being paid to traffic and pedestrian issues. The retail and entertainment facilities, as well as the child care facility, will attract considerable short-term vehicle activity at certain times of the day. The existing considerable pedestrian traffic along Abercrombie Street (especially at peak hours) will be conflicted with the driveway activity.</p>	<p>With respect to service vehicle traffic, it is expected that the proposed Block 1 and 4N development would generate some 66 two-way movements per day (i.e. 33 in plus 33 out) or 16 two-way movements per peak hour (i.e. eight in plus eight out).</p> <p>In relation to traffic generated by the proposed childcare centre, this has been estimated with consideration to the traffic generation and parking provision rates contained in RMS's <i>Guide to Traffic Generating Developments</i>.</p> <p>The RMS guidelines provide the following trip generation rates for a childcare centre during the two commuter peak periods:</p> <ul style="list-style-type: none"> ▪ morning peak period (7:00am-9:00am) - 0.8 vehicle trips per child; and ▪ evening peak period (4:00pm-6:00pm) - 0.7 vehicle trips per child. <p>The above generation rates correlate to the parking provision rate (contained in the same guidelines) of one parking space for every four children. This equates to trip generation rates of 3.2 and 2.8 trips per car space provided, for the morning and evening peak periods respectively.</p> <p>It is proposed to provide four parking spaces in the Block 1 and 4N basement for use by the proposed childcare centre. On this basis, it is expected that approximately 12-13 vehicles per hour from the childcare centre would use the Abercrombie Street access.</p> <p>It is noted that RMS (traffic and parking) rates are based on the average of all sites surveyed, including in suburban locations. The rates specifically for the Central Park site would be much lower for the following reasons:</p> <ul style="list-style-type: none"> ▪ the site is located within Sydney CBD area with well serviced public transport infrastructures including heavy rail and buses; ▪ the subject site is located within 500m walking distance to Central Railway Station; ▪ the subject site is located immediately adjacent to a major bus corridor on Broadway with additional nearby bus stops within walking distance at Railway Square; and ▪ the proposed child care centre would be targeted at parents working on and around the site. <p>Therefore, the above traffic estimate for the proposed childcare centre is conservative. It is likely to be at least half of the above estimate. However, for analytical purposes, the assessment assumes the childcare centre would generate about 12-13 vehicles per hour.</p> <p>In summary, the Abercrombie Street access would have a total of 29 vehicles per hour comprising:</p> <ul style="list-style-type: none"> ▪ approximately 16 service vehicle movements, and ▪ approximately 13 non-service vehicle (i.e. passenger car) movements. <p>It is noted that Abercrombie Street carries approximately 2,000 vehicles per hour (based on RMS traffic data). As such, the expected additional traffic using the Abercrombie Street access is very low in comparison to the existing traffic volumes. An additional 29 vehicles per hour using the Abercrombie Street access would have a negligible traffic impact on the local road network including Abercrombie Street itself.</p>
<p>It should be noted that despite the provision of the new public park ("Chippendale Green"), the increased population on the CUB development site actually reduces the green space provision in Chippendale - already a suburb with one of the lowest green-space-per-resident ratios (I forget the Correct term), and certainly below the</p>	<p>See above with regard to communal facilities and areas of communal space/external areas within the site.</p>

recommended standard.	
The proposed application is a substantive change to that which was approved under the Concept Plan. It does not meet the relevant design and amenity standards, including solar access, ventilation, storage space, communal space and open space.	<p>The proposal of Block 4S has been designed in accordance with the SEPP 65 principles and achieves internal unit dimensions, communal open space, facilities, and external areas additional to the requirements of the relevant provisions within the development control plan and the AHSEPP.</p> <p>Additionally, as demonstrated by WSP, the proposal complies with require cross flow ventilation requirements, and provides solar access to the key living areas and communal spaces within building.</p>
Solar Access - While the proposal may be appropriate for very short term accommodation, it is totally inappropriate for affordable housing or student commotion.	The proposal meets the requirements of Class 3, and achieves solar access to the areas of communal outdoor open space, as well as livings areas within the multi-share apartments.
Disproportionate number of students in the area must be considered	Noted. See above
Chippendale also has one of the highest transient populations in Sydney. The suburb also has the lowest percentage of open space and community facilities in the inner city (City of Sydney studies prepared re Central Park). While the addition of Chippendale Green is welcome, unfortunately it does not address the critical shortage in open space and community facilities (given the corresponding increase in residents and workers on Central Park).	Noted. The student accommodation building proposed incorporated facilities and internal communal open space in excess of the requirements set out in the DCP and AHSEPP. In any event, the proposal for student accommodation (maximum of 826 places) replaces some 1600-1800 office workers that would have otherwise occupied this location and used the areas of open space at peak periods. The very nature of student accommodation and the student timetables means that students will use the areas of communal open space (as well as those at UTS, Sydney University and Notre Dame etc) spread throughout the day.
Critically, the longer term social sustainability of the suburb must be considered. The suggestion to add another 826 beds, when there is such a high volume of student housing in the immediate area is irresponsible. Further the suggestion that existing rental stock will be freed up by students moving out of shared terrace accommodation to live in small "pen" type rooms and nominally pay \$300 - \$350 / week is mischievous (the rate has been discounted by more than 20% when compared to developments such as Iglu on Regent Street). Students on a limited budget are unable to afford these high rentals. Typically the students that can afford the high rise student housing are overseas students. Hence this Block will be additional stock rather than facilitate the move from inexpensive accommodation.	<p>The location of the site is in proximity to numerous tertiary education institutions and provides accommodation that is proven to successfully meet the needs of students, and meet acute housing shortages.</p> <p>The proposal does not generate additional places within the surrounding tertiary education facilities, rather provides additional accommodation for student attending the tertiary education facilities, which in turn, alleviates the existing pressures on the limited rental market for student in this area.</p>
<p>Blocks 4N</p> <p>I understand the changes to Block 4S will result in some changes to Block 4N. This includes the relocation of the service driveway to Abercrombie Street, directly adjacent to the heritage terrace homes. Notwithstanding the high risk that the building works will result in the loss of these historic properties, the proposed location is simply in the wrong spot. In short it will be located directly between what will be a large scale "licensed venue" (the Abercrombie hotel) and the public domain space through to Central Park West. This will result in a large number of pedestrian accidents.</p> <p>Further, the proposed "function centre" on top of Block 4N and Block 1 is inappropriate. While the application may not specifically be for a venue at this stage, it should be considered at this stage, given the proponent's intent. There are already about 20 licenced venues proposed for Kensington Street; nominally about 20 venues in and around the podium and lower courtyard levels under Block 2 and more venues near Chippendale Green. From the plans for Block 4S it appears that another 2 venues are likely to be located there, as well as in the Australian Hotel and more venues around the</p>	<p>The proposal has been referred the RMS who raised no issue with the proposed vehicle crossing arrangement. Similarly the proposed vehicle crossing to Abercrombie street has been considered by GTA Traffic Consultants (Appendix C of Concept Plan Mod 8).</p> <p>The proposed modification to Blocks 1 & 4 does not involve the creation of a function centre.</p>

Brewery Yard. To add a large scale function centre on top of Blocks 4N and 1, is totally irresponsible and not in the public interest.	
SEPP 65 provisions have not been met and the proposed is an undesirable intensification of the site	The proposed development has been designed to align with the principles of SEPP 65. It has been acknowledged that the RFDC rules of thumb may not be achievable within student accommodation developments, given they are relevant to residential flat buildings.
Chippendale Residents Group Submission	
BLOCK 4S	
1. Chippendale has a critical lack of open space and community facilities	The proposed development provide over and above the required internal communal area and external areas within the site (in accordance with the relevant planning provisions), as well as a number of facilities on site that would not otherwise be provided in a residential development.
<p>2. A high transient and the cumulative impact from a rapidly escalating student population base</p> <p>Further, the impact on local amenity as a consequence of students attending local universities needs to be considered.</p> <p>Notwithstanding this, the observation is made that the introduction of a high concentration of student housing at this location will detrimentally impact local amenity and social sustainability as well as have a corresponding economic impact on local businesses.</p> <p>The introduction of office accommodation in the Concept Plan was intended to minimise the impact that a concentrated demographic would have on Chippendale. It's aim was to encourage the concept of living/working locally and sharing resources rather than increasing demand and corresponding socio-economic impact to unsustainable levels, As such, the proposed change in land use is raising considerable concern.</p>	<p>The Economic Impact Assessment prepared by Macroplan considers the proposed additional population of student to the area. Compared to office workers, permanent student resident spend extends beyond working hours, effectively providing more support for retail provision in surrounding regions. In addition, it is anticipated that expenditure in entertainment and tourism will be greater from the student cohort.</p> <p>The student accommodation facility is designed to meet the specific needs of students including the provision of pastoral care and services on site.</p>
<p>3. Traffic, Transport and Amenity</p> <p>While the proposal is not subject to the City of Sydney's new City Plan, the State Government's interim guidelines for development on "busy roads" apply. Notably, the proposed design fails to meet the standards and compromises student amenity. This raises a number of concerns which we later discuss.</p>	<p>The proposed design of units, operable windows, and acoustic impacts to amenity has been considered in the design. The proposed design is not dissimilar to the residential apartment building located within on inner city roads (such as Block 2 fronting Broadway).</p> <p>Furthermore, Acoustic Logic (Appendix H of the Block 4S RTS) have considered the internal acoustic amenity for students is capable of being provided.</p>
Cycle Route and location of the proposed route by Council will be impacted by the proposed design and vehicle entry point	The proposed cycle route on Abercrombie street has been relocated to the western side of the street and will therefore not be affected by the proposed vehicle crossing.
<p>Other challenges</p> <p>These include the interface of Broadway and in particular the increase in licensed premises in recent years. The proposed introduction of an entertainment strip on Kensington Street as well as large retail/licensed venues on Block 2 escalates concerns.</p> <p>The correlation between a large number of licensed venues and high concentration of student housing brings with it some inherent risks and challenges,</p>	As stated above, there is no correlation between student accommodation and licensed premises. Furthermore, whilst retail premises are proposed on the site in accordance with the Concept Plan, not all of these premises will be licensed.

<p>Cumulative Impact</p> <p>In short, while the proponent may seek to vary the Concept Plan to reduce the financial risk, further consideration should be given to alternative options that provide more viable and longer term socially sustainable planning.</p>	<p>An amendment to the Concept Plan is sought to response to the sites long term demand, Flexibility is sought in the potential and uses (for Block 1) to allow for the appropriate and viable response to be provided. At this stage Frasers is actively seeking commercial land uses.</p> <p>The provision of student accommodation meets an identified and ongoing need for student accommodation in this area of Sydney.</p>
<p>Modification to the Concept plan percentages</p> <p>This brings with increased intensification of the use of open space and local facilities that are already at a crucial level.</p> <p>While representations are made by the proponent's consultant that student accommodation should be considered as commercial use, arguing that a recent GST ruling indicates the same, it is essential that the change in land use is considered in context of its planning implications and impact on local amenity.</p>	<p>See comment above regarding communal facilities. Block 4S and the associated student accommodation that is to be provided provide a range of facilities and pastoral care for student through the operation a professional operator.</p>
<p>SEPP 65 and RFDC</p> <p>Concerns over SEPP 65 compliance, including:</p> <ul style="list-style-type: none"> ○ Solar access (the proposal does not meet the minimum standards specified by the Expert Advisory Panel to achieve 70% compliance across the entire site, with no less than 60% for any block - recommendation 24). The suggested solar access of 42% is totally unacceptable (notwithstanding it is calculated between 8am to 5pm, rather than 9am to 3pm). ○ Minimum building separation between Blocks 4S and 4N ○ Natural ventilation standards (e.g. the windows in rooms on the western façade, which will need to remain "completely open" to meet the relevant CO2 standards (ASHRAE Standard 62.1-2007) thereby not meeting the relevant acoustic and air pollution standards ○ Does not meet the relevant ESD and green star requirements, ○ Privacy including privacy between Blocks 4S and 4N (we do not consider the use of oblique windows, as a good design standards particularly given the number of other inherent challenges with the room and building design) ○ Communal space (between floors) is insufficient ○ The inclusion of a central courtyard enables day lighting/solar access to be improved to some rooms however misses the opportunity to provide good quality open or communal space ○ Many of the windows in the student's rooms rely on privacy glass, obscuring views and not providing a sense of space; rather many rooms will feel closeted with inadequate solar access and cross ventilation inadequate storage space within each room ○ Cross ventilation (windows on the western façade will need to remain closed to minimize the noise and pollution impact) 	<p>Refer to RTS for Block 4S. The proposal design of the student accommodation incorporates numerous ESD provisions, including the connection to the sites Central Thermal Plant and Water Factory. The ESD provisions within all building (where relevant and applicable) have been design, in accordance with the Concept Plan demonstrate a green star pathway.</p> <p>Consideration of the amenity of residents and adjoining land uses is addressed win the EIS and the relevant sections of the RTS.</p>
<p>DESIGN STATEMENT</p>	<p>The urban design report prepared by Foster + Partners considered the proposed building design with regard to the key heritage elements surrounding the site and the fine grain heritage form of the area. This is further discussed through the use of appropriate and sympathetic building</p>

<p>Context and Scale</p> <p>The Design Statement draws comparisons with the CBD. This fails to consider the context of the site as an inherent part of Chippendale and its visual relationship with the heritage streetscape and spatial relationship with Chippendale's fine grained heritage form.</p>	<p>materials and arrangement of the building podium form. (Refer to Appendix B of the Block 4S EIS).</p>
<p>Built form and Aesthetics</p> <p>The built form is described as appropriate for "student accommodation". We believe the massing and scaling is out of scale and context to the local streetscape and St Benedict's. As indicated earlier in this submission, representations were made to then Minister for Planning, Frank Sartor about the building's scale and size which were considered totally out of context with the local heritage streetscape.</p> <p>Further the building separate between Block 4N and Building 4S is inadequate. We suggest changes to the building alignment be considered for the purpose of improving the separation and public domain between Building 4N and 4S. This would enable better vistas through to the Brewery Yard and improve amenity for Block 4S (if a change in land use is still considered).</p> <p>Introduction of some finer grain lines / building variation to break down the visual mass and scale. In particular we note the inclusion of awning along Abercrombie Street. While the acoustics report suggests the necessity to address potential noise issues, we note awnings typically not used as part of the streetscape along Abercrombie Street and not shown in the relevant city plans. We ask that further consideration be given for community input prior to any decision being taken.</p>	<p>The proposed building envelope is consistent with the approved concept plan envelope. Importantly, the proposal does not result in any additional overshadowing to the surrounding areas of public domain, than that approved as part of the original concept plans and previous approved building.</p> <p>The building separation between Block 4N and Block 4S is consistent with the intent of the Concept Plan, and provide a suitable through site link at the ground level with large areas of public domain along with street furniture. The separation between Block 4N and 4S has been reconsidered and designed to allow visual outlook for the residents, whilst maintaining amenity.</p> <p>Refer to Section 2.1 of the Block 4S RTS that include a discussion on the proposed building articulation, separation and privacy for future residents and commercial tenants.</p>
<p>Density</p> <p>The proponent argues the proposal is in response to market demand and need for affordable student housing. While we commend the concept of affordable housing, it is essential design outcomes are not compromised. In short the size and scale of the proposed block is inappropriate and out of context with the local heritage area. In particular we note that Block 4S would be by far the largest of eleven purpose built blocks in the area; exceeding the scale and size of UTS's block in Harris Street, which is not located near residential homes and does not impact the local heritage streetscape'</p> <p>Further we are puzzled by the reference that the density responds to the desired future density of the area. The density proposed is not in the best interests of the local community nor sustainable. Specifically we note our previous comments in relation to poor design outcomes and the cumulative impact that the size and scale of the development will have locally. Further we note key concerns in relation the impact the density and massing will have on the immediate neighborhood including St Benedicts. While we appreciate that the introduction of student housing responds to market demand, and contributes to the outcomes for the city, the size and scale in addition to the number of recent approvals is inappropriate at this location.</p>	<p>See comments above.</p>

<p>Amenity</p> <p>SEPP 65 and solar access emphasised</p>	<p>See comments above and Section 2.2 of the Block 4S RTS.</p>
<p>Social Dimensions and Housing Affordability</p> <p>Reference is made in the Design Statement to the social context and desired future community. Key outcomes have failed to be considered including the social mix and longer term social-economic impact. Previous comments about housing affordability and the cumulative impact from the proposal are reiterated.</p>	<p>The economic impact has been considered within the Macroplan Economic Impact Assessment Report. The proposed development will meet an identified demand in a highly accessible location, within proximity to numerous tertiary education institutions.</p>
<p>Development Near Rail Corridors and Busy Roads - Interim Guideline</p> <p>Specifically, the acoustics report states that windows will require extra glazing which cannot be opened with a corresponding impact on amenity; similarly outdoor areas cannot be used along Abercrombie Street, with the proposed tenancies needing to supply an alternative ventilation or air conditioning system to maintain adequate ventilation with the windows closed. In the case of the western façade, a minimum of 10.38mm glazing will be required, with 6.38mm glazing for all other facades. Notably, the afternoon sun on the western façade will exacerbate the situation. While the guidelines suggest noise can be mitigated by having habitable and sleeping areas located on the side of the building furthest away from the noise source or using balconies or other interface to mitigate noise, this is not achieved.</p> <p>As such, the proposed design is detrimental to student amenity. Specifically the ESD Concept strategy report states that cross ventilation and air quality will only be met, if windows on the western façade are "completely open". While it is proposed that these windows be recessed (in part) to assist reduce the impact from the sun and a ventilation panel provided, the modelling shows that unless the window is fully open, the CO2 levels in the room will not be met. As such, the relevant acoustics criteria will not be met (and is likely to further exacerbate the situation due to poor air quality from idling traffic/congestion). Similarly concerns are held about the relevant hallway ventilation and fire safety.</p> <p>In short, key ESD criteria is not achieved for Block 4S. As such, we believe the green star rating is not achieved and suggest that the reporting be independently evaluated. We also note that it appears that the reporting does not consider the air quality impact from traffic congestion and idling time (as suggested in the interim guidelines).</p>	<p>The Acoustic Statement prepared by Acoustic Logic (Appendix H of the Block 4S RTS) considers the future internal amenity of residents. The statement concludes that the proposed design will meet the relevant acoustic noise criteria.</p> <p>A n ESD Memo has also been prepared to accompany the Block 4S RTS which demonstrates the proposal's compliance with Section J of the BCA (NCC) as well as suitable level of cross flow ventilation.</p>
<p>Economic Impact Assessment</p>	
<p>Affordable Housing</p> <p>The proposal for Block 4S suggests the introduction of specialist student housing under the NRAS scheme will relieve local market pressure. We reiterate our research which indicates student housing does not significantly reduce demand for</p> <p>shared housing locally (due to the cost differential); and rather the introduction of student housing blocks has increased student accommodation impacting Chippendale's longer</p>	<p>The National Rental Affordability Scheme (NRAS) is a joint Federal and State Government initiative to invest in and increase the supply of new affordable rental housing and encourage large-scale investment and innovative delivery.</p> <p>The proposed development meets the relevant criteria and guidelines of the scheme and has been awarded the NRAS grant.</p>

term social sustainability.	
Modifications	
<p>Project Application Blocks 1 & 4 (Mod.08_0253 Mod.4)</p> <ul style="list-style-type: none"> ○ The location of the main service access point off Abercrombie Street is not supported, given its interface along a key pedestrian route, when other viable alternatives from Central Park could be considered. Further the interplay between child care drop off/pick up and the loading dock is considered high risk. Its construction may also bring with it some key risks in terms of potential subsidence under the heritage properties. ○ The location of the child care centre within Block 4N is questioned given the potential impact in terms of noise, solar access and cross ventilation, ○ The loss of the public accessible space from the public domain area through Block 4N is not supported. Concerns are also held about longer term access to publically accessible places. 	<p>The proposed relocation of the vehicle entry from Abercrombie street has been considered by the RMS and Council who have not raised any concern of its location. The intent of this entry is to reduce the number of vehicles entering Central Park, and encouraging a more pedestrian friendly environment.</p> <p>The proposed modification to Block 1 + 4 does not involve any amendment to the location of the proposed childcare centre.</p>
<p>The amendments to the Public car park are not supported, without further investigations and a public exhibition process. As such, the modification is not supported.</p>	<p>The proposed modification seeks to allow on-site car parking to be utilised for visitors and patrons of the retail uses across the site afterhours. This would alleviate the demand on the existing residential streets of Chippendale and would localise any additional traffic within Central Park. The quantum of spaces to be used by the public would be limited to 100 and would be used afterhours for short-term parking only. Details of the proposed arrangements, including an assessment of any impacts and the number of spaces to be used, would be the subject of a future Section 75W Modification Application.</p> <p>Notwithstanding this, the proposed arrangements have been considered by GTA Consultants and are deemed appropriate. In summary, the spaces would only be made available afterhours when public transport operates at a reduced frequency, and would likely be used by people who are visiting residents of the site, students attending evening classes at surrounding Universities, people visiting from remote destinations and patrons of the restaurants / bars on the site. It is anticipated that these users would travel to the site by car, regardless of whether or not public parking is provided. On this basis, the proposed arrangements would alleviate parking on surrounding streets, as well as reducing traffic associated with people circulating to find a parking space. Further, as the spaces would be used afterhours (when there are lower levels of traffic on the streets) the use of some parking spaces by the public would not result in any adverse traffic impacts.</p>
Insite Submission	
<p>The EIS offers the following points in justification:</p> <ul style="list-style-type: none"> ▪ Low demand for commercial development in the locality; ▪ Difficulty in financing commercial development as high-level 'pre-commitment' is needed ▪ Blocks 1 and 4 may remain undeveloped for a considerable period if the change of use is not approved and the student accommodation does not proceed. ▪ Strong demand for residences, including for students. <p>For the report to merely refer to another document to fully examine the impact of the changes (it only points out the potential benefits, and is therefore biased) is inadequate.</p> <p>Without at least summarising and examining the findings of the economic impact</p>	<p>It is standard practice to cross-reference other expert reports, rather than providing a lengthy summary / analysis as part of the EIS. The full Economic Impact Assessment was provided as an appendix to the EIS in the event that additional detail was required.</p>

assessment, this subjective analysis is somewhat misleading and renders the report incomplete.	
<p>Page 11 of the s.75W report notes that in addition to Block 4S, Blocks 3B, 3C and 10 have been approved as student housing, totalling 30,000m² (12% of the approved total GFA, some 255,000m² for the whole site) has been (and may be) approved for this purpose</p> <p>By contrast, table 2 on page 4 indicates an overall residential floor space increase of 16% when comparing the previously proposed (approved) and currently proposed proportions of residential and non-residential floor space.</p> <p>Across the entire site, the approved split of residential and non-residential floor space was about 60%-40%.</p> <p>The current proposal changes this proportion to around 75% to 25%. This exceeds the maximum percentage of residential area (according to Table 3 on page 4) per the approved Concept Plan by 5% (around 12,000m² of floor space, or a 70/30 split)</p> <p>While normally residential in nature, student accommodation is to be commercially operated, in a similar fashion to serviced apartments, a boarding house or hostel.</p>	<p>Noted. The proposed amendment to the Concept Plan seeks to amend the approved mix of uses on the site, increasing the maximum amount of residential floor space (from 70% to 77%) and a decreasing the minimum amount of non-residential floor space (from 30% to 23%) across the Central Park precinct.</p> <p>As stated in the EAR, student accommodation projects on the site represent approximately 30,000m² of GFA (or 12% of the GFA across the site) and are a key driver in the proposed change to the residential / non-residential split. Whilst these developments contribute to the quantum of categorised or 'planning-defined' residential floor space on the site, they are not a traditional residential use, and are more akin to a commercially operated hostel or serviced apartment facility. This position is supported by a recent ATO Tax Ruling which sees Student Accommodation being considered as commercial accommodation for GST purposes (ECC Southbank Pty Ltd as trustee for Nest Southbank Unit Trust v Commissioner of Taxation [2-12] FCA 795). However, it is acknowledged that the Department views such usage as residential.</p>
<p>Issues the Concept Plan amendment does not fully assess include:</p> <ul style="list-style-type: none"> ▪ Whether there are other forms of development, which may also have positive economic and social effects in the locality, to a greater degree than would student accommodation ▪ Whether the Central Park precinct and the locality would benefit from a greater diversity of housing, or a greater proportion of permanent-resident housing overall, is not assessed. 	<p>The Economic Impact Assessment prepared considers the availability/demand for commercial floor space as well as the demand for student accommodation. The uses proposed are viable and well suited to their location, that will promote economic activity within the area.</p>
<p>The quantum of student housing proposed for Central Pak, with regard to strategic planning objectives, for the site and the locality, is not justified.</p> <p>Planning and development of a State Significant Site should not be driven by relatively short-term economic conditions.</p>	<p>The proposed student accommodation will meet an identified demand in the area, well located close to numerous tertiary education institutions.</p>
<p>The design of the proposed building is highly purpose – built. Apart from other forms of quasi-residential / commercial use, it is difficult to see the building used for anything by other forms of short-term or defined-term accommodation, such as serviced apartments or variations on the tourist accommodation theme. The lack of adaptability to other uses of such a purpose-built project brings its longer term sustainability into question.</p>	<p>The proposal has been designed as a student accommodation building to meet an identified demand in the area.</p>
<p>The impacts of deleting commercial spaces and replacing it with the student accommodation has only been partially identified and discussed. A number of questions and issues arise from an analysis of the report which , at a minimum, should be answered before the applications are determined:</p>	<p>25,000m² of office space would accommodate 1,600 – 1,800 workers. Students' timetables are varied, and therefore there will be varied activity. Student use entertainment / retail. Students put stress on rental market – by providing 826 additional beds, this takes students out of the private market and alleviates pressure on rents. Similarly, significant pressure on housing, provides additional 250-300 dwellings to assist in meeting housing demand,.</p>

<ul style="list-style-type: none"> ▪ Whether 25,000m² of office-space would accommodate more or less people than 826 students/a greater number of office works would likely provide equal or higher levels of activity, given that students will be attending classes within and outside regular business hours. It is also common for office workers to stay in town and socialise or go to entertainment and hospitality venues after work. ▪ Whether provision of housing for a range of household types, to accommodate local and overseas workers and their families instead of student accommodation would provide a greater socio-economic diversity in the local population. ▪ Whether another 250-300 apartments would provide greater economic and social stimulus that wither offices or student accommodation? Using figures provided, this would appear to be the case. 	
<p>Apartment residents would be just as likely, if not more-so than students, to enliven the locality and avail themselves of local cultural and social facilities, due to having more spare time (students have to study). A likely high proportion of households would have higher disposable incomes than student households</p> <p>Permanent residents are equally, at least, even more likely to provide a greater contribution to both day-time and evening economies compared with students.</p> <p>For these reasons, permanent residents are equally, at least, and even more likely to provide a greater contribution to both day-time and evening economies compared with students.</p> <p>Residents working in the City and Inner Suburbs would derive considerable benefit from the high levels of accessibility the site provides.</p>	<p>The proposal seeks to use the site for student accommodation in response to an identified market demand.</p>
<p>In light of the data and analysis presented in the economic assessment, the case to build apartments for permanent occupation or longer-term accommodation for overseas or Australian –resident / citizen city-worker appears to be strong, when taking a boarder, strategic perspective than the report has taken.</p>	<p>The site proximity to numerous tertiary education facilities and services makes that site highly appropriate and suitable for student accommodation.</p>
<p>Current market conditions indicate that demand is strongest for student accommodation. However, this does not fully address the DGRs. Only presenting a case that student accommodation best serves current and projected short-term market conditions does not answer questions arising from the removal of commercial space and replacing it with student accommodation.</p>	<p>University and student demand has been prevalent for decades, and is anticipated to continue, particularly as Universities continue to expand in the local area.</p>
<p>The Economic Impact Statement concludes that student accommodation suits current market conditions and will make a positive contribution to site development objectives. However the case for apartments for permanent occupancy is very strong, if not stronger. Further analysis should be performed before the applications are determined to comprehensively compare and recommend which is the best form of hosing for the site, in terms of which form of housing best satisfies approved concept plan objectives, and positive economic and social contributions to the City of Sydney and the metropolitan</p>	<p>The site is located in a mixed use precinct within Sydney and is well suited and located for student accommodation. The proposal contributes to housing and market choice for various users within Sydney.</p>

region.	
The EIS does not completely satisfy the DGRs regarding economic impact. It has not completely examined the implications of replacing non-residential development with residential development, on Central Park site. The EIS's environmental risk analysis does not adequately consider social and economic impacts.	The Economic Impact Assessment Report provided as part of the proposal satisfies the requirement of the relevant DGR and considers the impact/demand for the proposed land uses.
Justification of student accommodation is based on relatively short term economic indicators, and should consider long term cumulative impacts.	The subject site is well located to numerous tertiary institutions in a mixed use precinct and well located to public transport. As such, the site is considered to be highly suited for the proposed student accommodation.
The proposal represents a significant departure from the land uses which were originally considered for this particular site, and with that departure comes a completely different set of potential impacts, none of which appear to have been adequately addressed.	The proposed modification to the land use is sought as part of the Concept Plan modification (MOD 8).
No other details about Block 1 are supplied at this stage by which I can understand the proposal.	<p>The proposed amendment to the Concept Plan seeks approval for the potential future land use. Any change to residential in the future would require a new SSD DA to be submitted to DPI detailing the proposed development and assessing any environmental impacts. An analysis of the benefits associated with a residential scheme are addressed elsewhere.</p> <p>The existing approved Project Application for a commercial development is currently what is being sought by Frasers.</p>
Any changes to the land use for Block 1 should go through a proper application process via a SSD so that the details are fully known and can be reviewed by the public. At that time, a further modification can accompany the plan. To make a modification now to the overall residential / commercial mix without providing further detail, is particularly disappointing and totally contrary to the representations that were previously made.	See comment above. An proposed to alter the existing building or propose a change to residential would be required to submit a new SSD application and consider all of the relevant amenity and built form requirements. The proposed modification to the Concept plan seeks approval only for the potential for an application to be submitted for residential uses in the future, should the use arise.
The approval of the Concept Plan was made on the basis of a minimum of at least 30% commercial and residential use to ensure the best planning outcomes.	<p>Noted. In light of recent market changes, the Concept Plan modification seeks to amend the land use mix to ensure the key objectives of the Central Park Concept Plan, namely:</p> <ul style="list-style-type: none"> ensuring the mixed use character of the precinct is retained; ensuring a high quality commercial development on the corner of Abercrombie Street and Broadway, which is proposed to be retained; ensuring that accessible through-site and pedestrian pathways, as well as key public assets are retained; and meeting the intended Central Park completion programme.
This proposal represents a significant departure from the land uses which were originally considered for this particular site, and with that departure comes a completely different set of potential impacts, none of which appear to have been adequately addressed. It has the potential to substantially change the character of the locality which is likely to result in corresponding social and economic impacts. It does not comply with the Concept Plan.	<p>As noted above, the proposed modifications to the land use mix seeks to ensure compliance with the Concept Plan objectives.</p> <p>As demonstrated in the Response to Submissions for the Block 1 and 4N modification (MP 08_0253 MOD 4), the proposed change can occur with limited impacts, and a number of benefits. In summary:</p> <ul style="list-style-type: none"> a residential scheme could be accommodated within the approved (or potentially smaller) building envelopes; due to the requirements of SEPP 65 and the need to provide residential amenity, the residential Block 1 envelope would potentially be narrower than the commercial envelope, with greater setbacks from Block 2 and Block 4N, and the potential for separation at the ground level; the redevelopment of Block 1 for residential purposes would enhance public amenity through increased public domain (between Blocks 1 and 4N), resulting in less overshadowing and more solar access to the Brewery Yard forecourt and Chippendale Green; the proposed modification would not result in any adverse traffic or parking impacts; and residential uses would be separate from commercial uses, and so there would be no impact on commercial operation.

	Notwithstanding the above, any change of use would require the submission of either a Section 75W Modification Application (Brewery Yard) or a new SSD DA (Block 1) to the DP&I. Any impacts of the change would be further assessed at this stage.
This application does not contain a Social Impact Assessment for the project. Commercial use is predominate land use which has been identified in all of the key strategic documents for this area of the Central Pak site, and a shift towards housing for student accommodation is a substantial movement away from this original land use and has significantly different potential implications on the local area, all of which need to be addressed in a comprehensive social impact assessment.	Central Park is a mixed use precinct well located to public transport and well located for student accommodation. The impacts associated with the land use change are considered as part of the Concept Plan modification and accompanying consultant reports.
The assessment is incomplete and should be revised. Changing from commercial to residential use would have a detrimental effect on economic activity. This has not been factored into the risk assessment and should have been. Neither have the substantial social risks nor overloading this area with a demographic dominated by foreign students.	Refer to Economic Impact Assessment and Concept Plan (Mod 8) response to submissions. The economic activity generated from the proposed student accommodation compared to Commercial use has been considered.
The EIS does not identify what the consequences of removing the office space may be, as the DGRs explicitly require.	The Economic Impact Assessment Report was prepared in response to the relevant Director General Requirement.
<p>The economic impact assessment is subjective, misleading and incomplete. It does not address alternative uses for the Block 4S site. For example:</p> <ul style="list-style-type: none"> ▪ Whether there are other forms of development, which may also have positive economic and social effects in the locality, to a greater degree than would student accommodation. ▪ Whether the Central Pak precinct and the locality would benefit from a greater proportion of permanent – residential housing overall. ▪ The quantum of student housing proposed for Central Park, with regard to strategic planning objectives, for the site and the locality. ▪ Planning and development of a SSS which should not be driven by relatively short-term economic conditions. <p>No other details about Block 1 are supplied at this stage, making it extremely difficult to understand or respond to in any detail. This is unfair to residents who are feeling increasingly bullied and powerless in the face of these relentless demands.</p>	The proposal is for student accommodation in lieu of office space. As a result, the EIS focused on these uses, and the long term benefits of alleviating pressure on private market rents.
Lisa Delazzari/Peter Waller	
This application does not contain a Social Impact Assessment (SIA) for the project. Commercial use is the predominate land use which has been identified in all of the key strategic documents for this area of the Central Park site, and a shift towards housing for student accommodation is a substantial movement away from this original land use and has significantly different potential implications on the local area, all of which need to be addressed in a comprehensive social impact assessment.	The proposed modification (Concept Plan Mod 8) and accompanying expert report have been prepared to adequately consider the impacts associated with the proposed modification.
The environmental risk assessment is incomplete and should be revised. Changing from	The Economic Impact Assessment demonstrates a lack of demand for commercial floor space in this part of the CBD, both now and into the

<p>commercial to residential use would have a detrimental effect on economic activity. This has not been factored into the risk assessment and should have been. Neither have the substantial social risks of overloading this area with a demographic dominated by foreign students.</p>	<p>foreseeable future. Further, any future need for commercial floorspace is already adequately catered for by major projects such as Barangaroo, and so the potential loss of commercial floor space in this periphery CBD location would not result in any adverse economic impacts.</p> <p>The increased residential population could readily be accommodated on the site. As noted elsewhere, a residential development could be contained within the existing approved building envelopes for Block 1 and the Brewery Yard, and could result in positive environmental impacts on the site through increased public domain and improved solar access. The potential environmental impacts would not result in any adverse traffic, parking or amenity impacts, and would represent the most efficient and economic use of the land.</p>
<p>The economic impact assessment is subjective, misleading and incomplete. It does not address alternative uses for the Block 4S site.</p>	<p>The Economic Impact Assessment has been prepared to provide consideration of the impacts of proposed amendments to the Concept Plan and impact associated with the student accommodation use.</p>