4

**From:** "Ann Young" <anny0ung@tpg.com.au>
**To:** "Caroline Owen" <caroline.owen@planning.nsw.gov.au>
**Date:** 4/8/2013 3:09 pm
**Subject:** suggestion re block 4S

Hi Caroline,

Sorry I missed the deadline for submissions on Central Park - Block 4S.
This is a small suggestion I would like to add.

Block 4S has a front veranda with stairs going up to it. I would like to see a pedestrian and bike overpass of Abercrombie St from either the front or back of 4S (depending on where the other end is built and either UTS Blackfriars or Notre Dame should be happy to receive cyclists).

A level cycle path from UTS through Central Park to Redfern station and to uSyd via Notre Dame Uni would make trips easier and therefore more likely. IF they really believe that residents won't have cars then they need to make cycling easy.

It's a pity there are so many breaks in the wall around Chippendale Green. The same problem that USyd has with traffic noise coming through the gaps will happen at Central Park. Pity.

Ann Young

Chippendale.

**From:** "Ann Young" <anny0ung@tpg.com.au>
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 4/22/2013 1:33 pm
**Subject:** Changes to 4S and 4N

Dear Caroline,

Any gap in the wall shielding a place from a major road allows noise and pollution through. Just walk across the eastern building line at USyd to hear the difference a missing building can make to the noise.

There is still lead in petrol. We all need protection from it otherwise the dementia rate will become unmanageable.

Arcades and laneways should all be zig-zag to protect the people inside. Big buildings should not be allowed spaces between them.

In this development the southern boundary is open to cold winds. Any opening in the northern wall will allow a draft to blow through. In winter it will be miserable enough in Chippendale Green without encouraging flow through.

IF they want to encourage customers to their cafes around the Green they should rethink this 'gap' in their plan.

Central Park should have level bike ways joining it to other places.

It needs bikeways and shuttle buses to take people to the station so we don't get drunk drivers on the roads.

The space at the top of 4N could be a Dance Hall. Large spaces with sprung floors for dancing are like hen's teeth. Never mind small bars with live music. Please can we have large dance halls with live music for social dancing, please.

Ann Young

# Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

**From:** [redacted]
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 15/04/2013 3:46 PM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

15 April, 2013

The Department of Planning and Infrastructure
Bridge Street
SYDNEY NSW 2000

NOT FOR PUBLIC EXHIBITION

Email: caroline.owen@planning.nsw.gov.au

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops.

I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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).

7. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments.

Yours Sincerely

6

**Caroline Owen - Pandoras Box**

**From:** '
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 15/04/2013 6:15 PM
**Subject:** Pandoras Box

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

**Second Submission from Objector**

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 4/24/2013 8:23 am
**Subject:** Re: Mod. 06-1717 Mod 8

caroline.owen@planning.nsw.gov.au

SUBJECT: Mod. 06-1717 Mod 8

I have just discovered, to my dismay, that this modification to the approved Concept Plan proposes to allow for the land use of Block 1 to be changed from commercial to residential, should the proponent so decide.

This application accompanies a separate application to separate Block 4S from Block 1, with the aim of providing student accommodation.

In addition to this, further changes are proposed with regard to parking arrangements.

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.

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.

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.

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 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.

I object in the strongest form and ask that the Department ensure proper probity and that the public is properly and completely informed of any and all proposed changes. I can be contacted by return email or be telephone on .

Yours Sincerely

7

## Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 15/04/2013 10:41 PM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

15 April, 2013

**Confidential**

The Department of Planning and Infrastructure

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in and own property in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

8

## Caroline Owen - confidential

**From:**
**To:** <caroline.owen@planning.nsw.gov.a>
**Date:** 15/04/2013 10:51 PM
**Subject:** confidential

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

9

## Caroline Owen - Chippendale Congestion

**From:** [redacted] >
**To:** caroline.owen@planning.nsw.gov.au>
**Date:** 15/04/2013 6:11 PM
**Subject:** Chippendale Congestion

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

Chippendale

10

## Caroline Owen - Amendments to the Central Park Concept Plan

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 16/04/2013 10:53 AM
**Subject:** Amendments to the Central Park Concept Plan

16 April, 2013

**Confidential**

The Department of Planning and Infrastructure

Email: caroline.owen@planning.nsw.gov.au

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the developer is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I am a home owner raising a family in Chippendale have significant concerns about this proposed change.

1. The Central Park Concept Plan raised considerable public comment and was approved on the basis of a minimum 30% commercial use. The proposed change from commercial use to student housing is a material intensification of use and a significant departure from previous representations. Central Park is already a very high density development and these changes would have a significant further and negative impact on the area and the people who chose to live here/remain living here based on the original concept plan.

2. The amount of student housing, current and under construction, in the immediate area is already very high. 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.

Students are by their nature transient residents in the area and with already high numbers (in student housing and shared accommodation) 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 shortage in open space and community facilities, which has not been addressed by the introduction of Chippendale Green. The proposal fails to ensure Chippendale's longer term social sustainability and risks the historical character of the area.

3. The scale and design of the building has no relationship with historic St Benedict's or other buildings on Abercrombie Street. It will dominate the street frontage, is visually intrusive and detracts from one of the city's finest heritage buildings.

4. I understand that the developer is seeking approval on the basis of boarding house controls and this will mean that key provisions in SEPP 65 will not need to be meet. This suggests that the student accommodation provided will be of lowered quality. Students typically would live in this accommodation for at least 6 - 12 months and be at "home" for longer than full-time working residents - it therefore seems unreasonable to provide a lower standard of housing.

5. Any economic benefit from this change detracts from 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.

6. The proposed high volume student housing and introduction of be more than 40 + licensed venues across the site has the potential to . This has not been considered.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

## Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

**From:** [redacted]
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 16/04/2013 10:52 AM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

15 April, 2013

The Department of Planning and Infrastructure

Email: caroline.owen@planning.nsw.gov.au

Dear Ms Owen

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

12

**Caroline Owen - CORRECTION - OBJECTION – SSD5700-2012 Block 4S, Central Park, Chippendale**

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 16/04/2013 12:45 PM
**Subject:** CORRECTION - OBJECTION – SSD5700-2012 Block 4S, Central Park, Chippendale

15 April 2013

Chippendale 2008

**Confidential**

The Department of Planning and Infrastructure

Bridge Street

SYDNEY NSW 2000

email: caroline.owen@planning.nsw.gov.au

Dear Caroline

**OBJECTION – SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically at "home" longer than residents who work full-time.

3. The size and scale of the student accommodation is inappropriate. Students 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.

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.

4. 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.

5. 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.

6. The proposed high volume student housing and introduction of more than 40+ licensed venues across the site has the potential for a toxic mix. This has not been considered.

The application in its current form is not acceptable.

I would appreciate if the Department could keep me informed as to any future developments.

I would also appreciate it if my personal details are not made public.

Yours sincerely,

**Caroline Owen - Central Park Chippendale**

**From:**
**To:** "'caroline.owen@planning.nsw.gov.au <caroline.owen@planning.nsw.gov.au>
**Date:** 16/04/2013 12:18 PM
**Subject:** Central Park Chippendale

Objection: SSD5700-2012 Block 4S.

Dear Caroline,

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street. As a resident of Chippendale it concerns me:

1) The size of the student accommodation is inappropriate given approval has already been granted for Block 3B, 3C and 10 on Central Park. This, on top of other student housing that has been approved over recent years, means there's already a high volume of student housing in the immediate area.
2) The Concept Plan was approved on the basis of a minimum 30% commercial use. The proposed change is a significant departure from previous representations.

I've been a big supporter of the Central Park development despite the sometimes bitter opposition from my local community. My family and I have already made good use of what is a wonderful new green space at Central Park but I'm now concerned the project could lead to a longtime scare on what is a great part of Sydney.

I trust you can keep me informed of any future developments and please ensure my personal details are not made public.

Yours sincerely

Mobi
W

14

**Caroline Owen - Objection: SSD5700-2012 Block 4S.**

**From:** [redacted] >
**To:** "caroline.owen@planning.nsw.gov.au" <'caroline.owen@planning.nsw.gov.au'>
**Date:** 16/04/2013 12:41 PM
**Subject:** Objection: SSD5700-2012 Block 4S.

Objection: SSD5700-2012 Block 4S.

Dear Caroline,

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street. As a resident of Chippendale it concerns me:

1) The size of the student accommodation is inappropriate given approval has already been granted for Block 3B, 3C and 10 on Central Park. This, on top of other student housing that has been approved over recent years, means there's already a high volume of student housing in the immediate area.
2) The Concept Plan was approved on the basis of a minimum 30% commercial use. The proposed change is a significant departure from previous representations.

I've been a big supporter of the Central Park development despite the sometimes bitter opposition from my local community. My family and I have already made good use of what is a wonderful new green space at Central Park but I'm now concerned the project could lead to a longtime scare on what is a great part of Sydney.

I trust you can keep me informed of any future developments and please ensure my personal details are not made public.

Yours sincerely

[redacted]

15

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 4/16/2013 2:03 pm
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

16 April, 2013
Confidential
The Department of Planning and Infrastructure

Email: caroline.owen@planning.nsw.gov.au

Dear Caroline
Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

I understand the developer is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I am a home owner raising a family in Chippendale have significant concerns about this proposed change.

1. The Central Park Concept Plan raised considerable public comment and was approved on the basis of a minimum 30% commercial use. The proposed change from commercial use to student housing is a material intensification of use and a significant departure from previous representations. Central Park is already a very high density development and these changes would have a significant further and negative impact on the area and the people who chose to live here/remain living here based on the original concept plan.

2. The amount of student housing, current and under construction, in the immediate area is already very high. 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.

Students are by their nature transient residents in the area and with already high numbers (in student housing and shared accommodation) 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 shortage in open space and community facilities, which has not been addressed by the introduction of Chippendale Green. The proposal fails to ensure Chippendale's longer term social sustainability and risks the historical character of the area.

3. The scale and design of the building has no relationship with historic St Benedict's or other buildings on Abercrombie Street. It will dominate the street frontage, is visually intrusive and detracts from one of the city's finest heritage buildings. There is no precedent at all for a building of this height in Chippendale. Nothing along Abercrombie Street currently is more than 4 or 5 storeys tall.

4. I understand that the developer is seeking approval on the basis of boarding house controls and this will mean that key provisions in SEPP 65 will not need to be meet. This suggests that the student accommodation provided will be of lowered quality. Students typically would live in this accommodation for at least 6 - 12 months and be at "home" for longer than full-time working residents - it therefore seems unreasonable to provide a lower standard of housing.

5. Any economic benefit from this change detracts from 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.

6. The proposed high volume student housing and introduction of be more than 40 + licensed venues across the site has the potential to . This has not been considered.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 4/16/2013 11:17 pm
**Subject:** SSD5700-2012

CONFIDENTIAL

Dear Ms Owen

Re: SSD5700-2012 Block 4S, Central Park; Modifications to Block 4N

I became a resident in Chippendale over thirty years ago. I now live fairly near the Central Park development.

I am concerned about these proposed modifications.

Block 4S:

Prior to the original concept plan being approved, the local community almost unanimously argued that the proposal was a gross over-development of the site.

We further argued this in (I think it was 2009) re further modifications.

The original plan called for a certain residential/commercial split-up and a quoted number of residents. The effect of this was to at least TRIPLE the existing working and residential populations of our tiny suburb. Clearly, there is no way such a huge increase could NOT have some effects on the existing suburb and its amenity.

The proposal - to now FURTHER INCREASE THE DENSITY with student housing - creates a serious departure from the original plans as approved.

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. That is, this proposal, and the previously approved student housing elsewhere on the CUB development site (currently under construction and under design) , increases density and population with a cohort of individuals with largely similar lifestyles and interests – such which does not necessarily sit comfortably with the existing diverse community, and - when concentrated together in one general area – magnifies the negative ill-effects.

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".

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.

Most students require accommodation for several years – effectively PERMANENT accommodation. 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 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.

Building 4N:

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.

Conclusion:

I understand the local community group is making a detailed submission about both 4S and 4N, and I am happy to endorse their comments.

I appreciate that this developer seeks to produce a high-quality product with quality finishes and design features. The evidence of the existing buildings (under construction) verify this. But that still doesn't compensate for allowing a gross concentration of sub-standard student on the total site, nor inadequate vehicle/pedestrian interface.

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 recommended standard.

Yours faithfully

Chippendale

17

## Caroline Owen - 'Central Park' Objection

**From:** Simon Flynn <simonjflynn@yahoo.com.au>
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 16/04/2013 9:57 PM
**Subject:** 'Central Park' Objection

Dear Caroline

**Central Park SSD5700-2012 Block 4S and corresponding applications MP MP06_0171 MOD8, Modification to Approved Concept Plan MP 06_0171 MOD 806_0171 MOD8 & Section 75W Application**

You may recall meeting me in a delegation of Chippendale residents earlier this year. I am a long term Chippendale resident and live with my daughter and her cat 'Ranga' in Dick Street. Dick Street is a low rise residential street with many longer term residents living here. Many of us have lived here for over 20 years. The street is located within 100 metres of proposed Block 4S. The proposed changes are likely to detrimentally impact us in terms of reducing local amenity. I raise the following concerns:

**Block 4S**

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. There are also issues around the design of the façade, acoustics and privacy as well as the building separation with Block 4N. In particular I note that the Expert Advisory Panel clearly stated at the time of the Concept Approval no residential block should have less than 60% solar light. This was already a substantially detrimental change against the minimum state standards. While the proposal may be appropriate for very short term accommodation, it is totally inappropriate for affordable housing or student commotion.

The proponent suggests that the change addresses the need for student accommodation in the CBD. Firstly "Central Park" is an inherent and historic part of Chippendale not the CBD. Importantly, Chippendale already has a disproportionate number of students who inadvertently impact local amenity. Specifically within 400 metres of the site, there is now:

- 2 blocks of student housing in Regent Street
- 1 large block of housing in Quay Street
- 1 enormous block of student housing in Harris Street
- Large scale student accommodation on Broadway

In addition, a number of other student blocks have been recently approved, namely:

- 3 blocks of student housing blocks on Central Park
- A new development approved for Cleveland Street
- Student housing on the Block.
- Accommodation on Wattle Street

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).

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. This in turn perpetuates

some of the challenges the suburb already faces from having such a high percentage of student population.

**Blocks 4N**

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.

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 Brewery Year. To add a large scale function centre on top of Blocks 4N and 1, is totally irresponsible and not in the public interest.

I do not support either application and would appreciate if you could keep me informed.

Yours sincerely

Simon Flynn

1
Chippendale NSW 2008

The Department of Planning and Infrastructure
Email: caroline.owen@planning.nsw.gov.au

16 April, 2013
Confidential

Dear Caroline
Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns:

1. 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.

2. 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. I would also like to question whether the criteria for the national affordable housing scheme can be met, if the housing is used for overseas students.

As a parent of a young child I am also concerned about the impact of the development on public amenities. 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. The increase in foot traffic through the area will have a direct impact on the existing community, increasing the amount of rubbish on the streets and noise concerns. While the proposal may meet current market demand it fails to ensure Chippendale's longer term social sustainability.

3. The overall economic benefit does not benefit the existing nor incoming residential community. Other options, such as family sized apartments or office space and

potential local work places, should be properly considered in consultation with the existing community.

5. 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.

6. The proposed high volume student housing and introduction of what will be more than 40 licensed venues across the site has the potential to completely change the residential nature of the area. In my opinion the cumulative impact of this proposal has not been considered.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely

Chippendale NSW 2008
Email:

The Department of Planning and Infrastructure
Email: caroline.owen@planning.nsw.gov.au

16 April, 2013
Confidential

Dear Caroline
Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns:

1. 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.

2. 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. I would also like to question whether the criteria for the national affordable housing scheme can be met, if the housing is used for overseas students.

As a parent of a young child I am also concerned about the impact of the development on public amenities. 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. The increase in foot traffic through the area will have a direct impact on the existing community, increasing the amount of rubbish on the streets and noise concerns. While the proposal may meet current market demand it fails to ensure Chippendale's longer term social sustainability.

3. The overall economic benefit does not benefit the existing nor incoming residential community. Other options, such as family sized apartments or office space and

potential local work places, should be properly considered in consultation with the existing community.

5. 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.

6. The proposed high volume student housing and introduction of what will be more than 40 licensed venues across the site has the potential to completely change the residential nature of the area. In my opinion the cumulative impact of this proposal has not been considered.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely

**Caroline Owen - Central Park**

**From:** [redacted]
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 18/04/2013 1:13 PM
**Subject:** Central Park

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

**Caroline Owen - Objection to SSD5700-2012 Block 4S, Central Park, Chippendale**

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 18/04/2013 3:24 PM
**Subject:** Objection to SSD5700-2012 Block 4S, Central Park, Chippendale

Dear Ms Owen

I wish to object to the application for approval for a high rise student housing block on Abercrombie Street that I understand will accommodate over 800 beds.

I am a Chippendale resident and while I believe that the Central Park development will have positive effect on the neighbourhood overall, I do not support the present proposal.

As I understand it, the proponent's view is that certain provisions under SEPP 65 should not apply to the project because boarding house controls should apply instead. I do not support this line of argument, as I do not believe that boarding house controls were meant to apply to housing on such a large scale, and there should be a minimum standard of residential amenity for student housing that would be better safeguarded by the application of SEPP 65.

I also believe that this is an undesirable intensification of the use of the site, when you consider that the original Concept Plan was approved on the basis of 30% commercial use. Chippendale already has a very high volume of student and low-cost housing in a very small area (including student housing already approved for Central Park), and I do not believe more can be supported without unacceptable pressures on local facilities and amenity.

For the record, I live at Chippendale. I do NOT wish my personal details to be made public.

Yours sincerely

**Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

**From:** [redacted]m>
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 18/04/2013 4:35 PM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

Dear Caroline
**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**
I am writing in response to the proposal for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops.
I live in Chippendale and the concerns I have are as follows:

1. Approval was based on 30% commercial use – the new plan goes against this
2. Substandard accomodation should not be acceptible – and it appears that this building will not align to SEP 65 guidelines
3. Chippendale already supports an overwhelming amount of student housing blocks including ones already in Central park. There is not enough local amentiies to address the additional people.
4. What evidence do you have that students will move from low cost housing to this block?
5. The scale and design will be an eyesore and will detract from St Benedict's, one of the city's finest heritage buildings
6. The volume of 40+ licensed venues and student housing is a very dangerous mix.

I strongly believe the application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.
Yours sincerely,

**urbanrenewal - Termination of Rail Line into Newcastle**

**From:**
**To:** <urbanrenewal@planning.nsw.gov.au>
**Date:** 4/18/2013 5:41 PM
**Subject:** Termination of Rail Line into Newcastle

Hi

Would just like to say that I hope consideration is giving to retaining the rail line through to Newcastle. I believe that the line is imperative to the renewal of Newcastle as with the new court house and University developments at Civic and no planned additional parking for these developments, the use of the rail as transport is only going to increase. There will be enough congestion without additional buses on the road to replace the train line.

I believe that the influx of people to the court and univeristy will help revilatise the CBD as extra food courts/grocery supplies will be in demand. Also, we need to think outside the square in encouraging more individualised specialty shops, that are not found at the large shopping centres like Westfield. People will be more inclinded to go into the CBD if there is something appealing there that is not found everywhere.

Thank you
Regards

# Caroline Owen - PROPOSED STUDENT HOUSING - BLOCK 4S ON CENTRAL PARK

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 19/04/2013 8:01 AM
**Subject:** PROPOSED STUDENT HOUSING - BLOCK 4S ON CENTRAL PARK

The Department of Planning and Infrastructure

Dear Caroline,

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I understand the proponent is seeking approval for a high rise student housing block (16 storeys plus 3 storey roof top) on Abercrombie Street that will provide 826 beds, student facilities and retail shops.

I am a home owner in Chippendale and wished to raise the following major concerns.

1. 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.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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 as it has 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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Yours sincerely,

Courtesy City of Sydney Archives

*Chippendale Residents Interest Group*
Email: chippendalecommunity@gmail.com

24 April, 2013

Department of Planning & Infrastructure
Bridge Street
SYDNEY NSW 2000

Email: Caroline Owen

Dear Caroline

**Multiple Applications for Central Park: MP06_0171 Mod 8, Project Application Blocks 1 & 4 (Mod.08_0253 Mod. 4) and SSD Block 4S (SSD 5700-2012)**

---

Thank you for the opportunity to comment on these applications. We also appreciate the Department's assistance in allowing more time for submissions.

We understand the proponent is seeking approval to amend the Concept Plan (MP 06_0171 Mod. 8) to excise the Block 4S from Blocks 4N and Block 1 and incorporate changes to the land use mix. Conversely, separate applications have been lodged for the approval of high-rise student accommodation for Block 4S (SSD 5700-2012) and changes to Blocks 4N and Block 1 (MP08-0253 Mod 4). This includes service vehicle access from Abercrombie Street (including a loading dock and drop off/pick up area for the childcare centre in Block 4N).

Further, we understand the proponent is also seeking to modify the Concept Plan to accommodate potential changes to the residential/commercial mix for Block 1 and the Brewery Yard. As such, the commercial land use component will be reduced from a minimum specification of 30% to 21% (23% including hotels and childcare). In addition, a modification to Condition A8 is sought for future public car parking. Many of these changes are significant in terms of the aims of the overall Concept Plan and representations previously made by Frasers.

In response, the proposal to change the land use from commercial to student housing for Block 4S is not supported, as the application is its current form does not adequately meet the relevant controls nor is in the public interest.

Further the proposed modifications to the Concept Plan to potentially change the land use mix from commercial to residential for Block 1 and introduce public car parking is not supported, as the case for these changes is not adequately made (and is not widely known or understood by local residents).

While we commend many of the design and environmental initiatives for Central Park per se; a number of key concerns have emerged in context to these applications as well as other more recent applications/modifications.

A detailed submission is enclosed.

The current applications suggest a number of funding considerations are driving the proposed changes. While we appreciate the challenges this presents, we believe it is imperative that any significant modifications to the approved Concept Plan are made with or following a detailed application that is on public exhibition so that residents are properly informed to be able to comment.

In particular we note the absence of an effective consultation process in the last couple of years and issues around the notification process. However the opportunity to meet with Frasers more recently was warmly welcomed; in particular

Courtesy City of Sydney Archives

**Chippendale Residents Interest Group**

Email: chippendalecommunity@gmail.com

discussions with Dr Quek. While we have been unable to resolve some of the concerns, a number of ideas were raised for Block 4S which we include in this submission.

Yet despite meeting with Frasers, it is disappointing that the proposed changes to the Concept Plan were not disclosed. This includes changing the Concept Plan to allow residential use for Block 1 and the Brewery Yard as well as modifications for future public car parking. Likewise there have been challenges clarifying some key information; e.g the number of storeys for the Block 4S was incorrectly stated as 14. Similarly we have found some information in the consultant's reports incorrect.

We would be happy to meet with the Department and the Planning Assessment Committee to discuss our concerns and similarly with the proponent. In the interim, we would appreciate if the Department could keep us informed about these applications and all future applications/modifications.

Yours sincerely
CHIPPENDALE RESIDENTS INTEREST GROUP

Courtesy City of Sydney Archives

Chippendale Residents Interest Group
Email: chippendalecommunity@gmail.com

**Annexure: Submission Central Park**

---

## A. Introduction

The proponent is seeking approval for the following concurrent applications:

- State Significant Application (SSD) for student accommodation on Block 4 South (SSD 5700-2012). This includes a 16 storey building with circa. 3 additional storeys of roof plant equipment (71.5AHD). Retail and communal facilities are proposed for the lower floors with student accommodation above (accommodating 826 beds).
- Application for Blocks 1 & 4 (MP 08_253 Mod). This includes modifications to excise Block 4S from the approved Block 1 and 4N development; and the introduction of a main service access point from Abercrombie Street.
- Modifications to the Concept Plan (P06_0171 Mod. 8). This includes separating building envelopes for Block 4N and Block 4S; changing the use of Block 4S from commercial to student accommodation (residential use); allowing Block 1 to be changed from commercial to residential use; changing part of the Brewery Yard for residential use; changing the minimum non-residential GFA requirement from 30% to 23%; modifications to allow a future application for public parking and changes to the public domain plan.

To better understand the context of our representations, some background information is provided.

## B. Chippendale Residents Interest Group

Chippendale Residents Interest group (CRIG) is a longstanding local residents group. We have been actively involved in reviewing the detailed studies that informed the City of Sydney's (COS) position on the initial plans for the redevelopment of the Brewery site; and the modification which followed the site's sale to Frasers (Modification 2). We are also familiar with representations that followed action in the Land & Environment Court (L & E Court) and discussions with the local community. We believe it is important to understand some of inherent challenges Chippendale faces when considering these applications.

## C. General Comment

The proponent's applications are supported by a number of reports. We note some information is incorrect; e.g. the EIS report for Block 4S suggests the building is 14 storeys high. Other reports suggest the site is located in the CBD. This is incorrect. The site is located in its entirety in Chippendale and is traditionally a historic and integral part of the suburb. While the north-east part of Chippendale has been viewed as a transition zone to the city, Chippendale is largely a low rise suburb.

## D. The Case for Chippendale

Chippendale is one of the city's smallest suburbs with a land area of 0.46 square km. This includes 9.9 hectares for railway lines running to the east of the suburb. Its current population is 4,057[1] residents with about 1,300 workers[2].

---

1 ABS 2011 Statistics

2 ABS statistics indicate the workforce is largely around Railway Square / Lee Street. Our working population estimates reflect the east and west precincts, however not including Regent/Lee Streets. The working population in the east and west precincts is relatively smaller – estimated at about 1,300 workers.



The current population density is already highest density housing with 100 persons per hectare[3] (for most of Chippendale). These counts are similar to the enumerated population density for Potts Point and Elizabeth Bay and compare to an average of 63.43 persons per hectare for the COS's local government area (LGA).

Population estimates at the time of the Concept Plan approval indicated estimates of 8,500 residents/workers including 2,500 residents. Since the modifications, we estimate a much higher residential/ student population- 5,000 residents using data[4] supporting Concept Plan 06_1071 Mod. 8. As such, Chippendale will have one of the highest densities in Sydney.

Chippendale is viewed[5] as a quiet haven hidden behind Broadway and some of Sydney's busiest roads. Without a high street or large commercial interface, the suburb extends south from Broadway to Cleveland Street and from Railway Square west to City Road. To its north is the University of Technology and Ultimo, with Broadway acting as a natural boundary, severing the relationship to Chippendale. While much of the suburb is still zoned mixed use, the suburb is largely residential, intercepted by low scale businesses as well as the University of Notre Dame which commenced operations in recent years. Higher scale buildings transition the suburb on its north east corner to Railway Square and the city.

About 2,000 residents[6] live in close proximity to the former brewery site (south to Cleveland Street, east to Regent and south-west to Buckland Street). This includes nearly 360 families. Most residents live in medium density housing - mainly low-rise terraces, warehouses and apartment blocks. Compared to other neighbouring suburbs, many homes in the immediate area have little or no open space, necessitating a greater demand for public domain and open space. The area is also intercepted with some galleries.

While initially well received, the cumulative impact from businesses that operate outside traditional business hours has highlighted the conflict between residential and business needs. Notably, reports previously provided by the proponent incorrectly showed a number of local properties as commercial rather than residential use. This includes documents provided to the Department for the overshadowing/sun access for modifications to the Concept Plan[7].

For the purpose of understanding how the changes to Block 4S and associated applications impact local amenity, the following challenges are highlighted:

1. *Chippendale has a critical lack of open space and community facilities*

   Open space is estimated to be less than 1 sqm/resident[8] against a minimum LGA standard of 6.6sqm and minimum provision of 6.0 sqm for other suburbs in the LGA (Green Square). While the introduction of the Main Park (Chippendale Green) is well received, given the population size it does not address Chippendale's acute shortage of open space and community facilities. The park's location on O'Connor Street was a key recommendation for the Concept Plan, to ensure its integration with the existing population and provide much needed open space.

---

3 ABS statistics show a density of 87 persons per hectare. However this figure includes the land area for Central Park which does not as yet have a population base and 9.9 hectares for the railway lines. Enumerated population counts are 100 persons per hectares, comparatively the same as Potts Point/Elizabeth Bay. (refer http://atlas.id.com.au/sydney).

4 Estimates are based on residential unit numbers detailed (and corresponding population counts) using GTA Consultants report dated 19 December, 2012

5 Residents Survey conducted by Chippendale Residents Interest Group, December 2012 – January 2013

6 ABS 2011: 611 residents live south to Cleveland, 956 south-west to Cleveland/Buckland Street (not including the west side) and 311 persons live in the Goold/Outram Street area.

7 Additional overshadowing and solar access maps provided to the Expert Advisory Panel in 2008. Some buildings are incorrectly identified as commercial rather than residential. This includes buildings on the corner of Blackfriars and Abercrombie Streets (which will be overshadowed by the proposed Central Park development; Dick and Abercrombie Street and Balfour and Queen Streets.

8 City of Sydney's Open Space Study, commissioned for Central Park (adjusted to reflect 2011 population counts)

Reports previously commissioned by the City of Sydney - specifically studies on Open Space and Community Facilities identified some of the inherent challenges presented by the redevelopment; including highlighting the impact the development would have on local residential amenity: *"not only residents but also additional workers and students using facilities in the area"*.

In response to the proposed density, the report recommended a minimum of 6smq of public space per resident be allocated (rather than a percentage of the site area) and 0.3sqm of public community facilities. In particular, the report noted that any reliance on regional space at Prince Alfred Park or Victoria Park was inappropriate (due to lack of direct access and pedestrian connectivity).

The introduction of a larger scale entertainment/retail area in Kensington Street and under Block 2 as well as in and around the Brewery Yard is likely to have a major impact on local amenity. Likewise the proposed change in land use from commercial to student housing will intensify demand on the limited resources Chippendale already has. The proposed modification in the Concept Plan to potentially change Block 1 from commercial space to residential use adds to these inherent challenges.

2. *A high transient and the cumulative impact from a rapidly escalating student population base*

The benefit having a diverse population base and its correlation to social sustainability is well understood. Low and medium density housing typically attract a higher proportion of owner/purchasers, while high density areas attract investors, resulting in a more transient population[9].

One of the key challenges Chippendale faces, is its high transient population. 53% of residents are new to Australia, with only 49% having the right to vote[10]. While 25% of the local population currently study at tertiary institutions, Chippendale faces inherent challenges from having such a high transient population and concentration of student accommodation. In particular, the lack of open space, limited resources and its corresponding (and cumulative) impact on residential amenity are inherent challenges.

Typically most students live in shared accommodation or use homestay and informal arrangements. The introduction of purpose built high density housing has mainly occurred in the last few years. This includes purpose built blocks on Dwyer, Regent, Harris and Quay Streets with more student blocks have approved on Central Park (in Kensington Street) and also nearby at the Block and Abercrombie and Wattle Streets. Most blocks have only been recently introduced, with the corresponding student numbers not reflected in the 2011 census population counts.

In total we estimate accommodation for nearly 3,400 students has been approved in the area in the last few years. This is in addition to the existing student population base (living in private dwellings etc) and existing student block - Unilodge. The location of proposed Block 4S and the other blocks are shown in Diagram A. Significantly, the scale and extent of student accommodation was not envisaged at the time of the Concept Plan approval and is now noticeably impacting local amenity.

If Block 4S is approved as student accommodation, it will mean that the number of students living in student blocks in the area will be nearly double the population base.

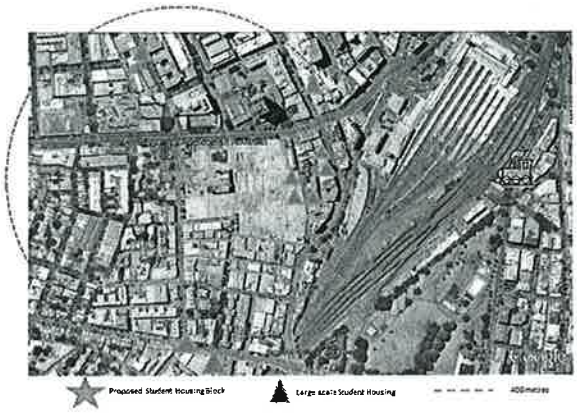
---

9 City of Sydney Affordable Rental Housing Strategy 2009-2014

10 ABS statistics, 2011



Diagram A: Proposed Block 4S in context of other large scale student housing blocks




Further, the impact on local amenity as a consequence of students attending local universities needs to be considered. For example, the University of Notre Dame has expanded its operations from 380 students to about 4,000 FTE in the last few years without providing sufficient amenity or having a Master Plan; there has also been a substantive increase in the University of Technology's student population. Both universities are reliant on what little amenity there is in the area. This differs from the University of Sydney which has extensive open space on their grounds.

Notably, while the draft Metropolitan Strategy shows the area as "*Sydney's education and health*" precinct, there has been little community input or independent studies that has considered the impact such a high concentration of students and student accommodation has on Chippendale.

At the same time, longer term residents and an aging demographic are continuing to live in the suburb. Many have families. As such the escalating demand on the area's limited resources is becoming unsustainable and is highlighting the challenges that are arising from different demographic needs.

The Economic Impact Assessment Report (EIA Report) argues the case for student accommodation for Block 4S, suggesting an undersupply of 19,722 beds and that the introduction of purpose built student housing at this location will free up local accommodation. Our research indicates some of the key assumptions are incorrect. This includes the assumptions about "freeing-up" private rental dwellings; the number of beds and the potential economic impact. This is later discussed in this submission. Irrespective a query is raised, whether the housing is eligible for the NRSA. 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.

The introduction of office accommodation in the Concept Plan was intended to minimise the impact that a concentrated demographic would have on Chippendale. Its 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.

In summary, the proposal(s) fail to consider the inherent underlying challenges that Chippendale already faces - they do not protect or enhance Chippendale's overall character and ensure equitable access and livability. Rather they compromise local amenity and the suburb's long term sustainability and social mix.

3. *Traffic, Transport and Amenity*

More than 1.6M[11] vehicles travel through Chippendale each week on some of the City's slowest performing roads[12]. Notably traffic on Abercrombie, Regent and Cleveland Streets has substantially increased in recent years while traffic elsewhere around the CBD has decreased. While the proponent argues the addition of 550 vehicle movements per hour to/from Central Park is relatively small in terms of the overall traffic impact, this fails to consider that the immediate streets are already at gridlock during and outside peak hour. Further it appears that the traffic assessments use base line data from a few years ago, which should be updated to reflect the current data and proposed changes in the transport/traffic network.

The National Pollutant Inventory illustrates the impact vehicle emissions have in Chippendale[13]. In particular the pollution is exaggerated in the east precinct due to the local topography and traffic congestion. Significantly, Abercrombie Street carries some of Sydney's heavy goods traffic and is one of the most congested roads[14]. Traffic gridlock and idling vehicles are typical directly alongside the proposed site for Block 4S. This presents some inherent design challenges in terms of achieving good ESD and residential amenity outcomes. 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.

While no vehicle parking provision is made for students in Building 4S, the building by virtue of its location will generate additional traffic for drop offs/pickups (in a site sensitive location). Further without a corresponding reduction in overall parking spaces on Central Park, it is assumed that the car spaces that were set aside for Block 4S were reallocated to other parts of the site. This misses an opportunity to reduce the traffic impact.

The proposal for Block 4S indicates the main interface between local universities and proposed accommodation block will be walking and cycling. This is commended. However, the proposed cycle route (which is now on exhibition) presents some serious dilemmas in terms of its traffic interface. Specifically, it generates high volume cycle movement on non-dedicated routes through high traffic areas (i.e. Balfour, Meagher, Myrtle and Shepherd Streets). These routes are already facing considerable challenges in terms of the traffic and residential/business interface. Unless the traffic can be successfully limited by the RMS/Council, the introduction of a non-dedicated cycle route will be high risk. Further, the influx of vehicles to/from Central Park and proposed "entertainment areas" will escalate these challenges. As such, instigating high volume cycle routes without introducing dedicated routes will impact local amenity. This urgently needs further consideration.

A reference in the proposal is also made to a route along Wellington Street. This route carries some inherent risks given its interface with the high volume traffic volumes on Regent Street (about 50,000 AADT) and the main vehicle access point to Central Park. Previously we were advised this route would be removed from the City's cycle way due

11 RMS average annual daily traffic counts

12 Cleveland Street is the State's slowest performing road - refer RMS Key roads performance report, December 2012

13 National Pollutant Inventory: source location is the former Brewery site (2008) when the site was decommissioned. The data highlights vehicle emissions in the area are substantially over safe guidelines. Data is no longer taken given the site's redevelopment, however notably traffic has since increased.

14 Abercrombie Street is not shown in the RMS Key Roads Performance Report despite being a major arterial route and carrying some of the City's heaviest truck movement. Local evidence suggests that congestion is greater than Cleveland Street during peak hours (which is Sydney's heaviest congested road -- average speed 14-16 km/hr). The truck movement also has serious implications for pollution and vibration.

to concerns about the interface with Regent Street and curtilage with Mortuary Station. We are keen to look at options how this could be better managed. As such, we would like to clarify the basis for the route and expected usage and suggest the proposal for Block 4S is not be considered until these concerns can be addressed.

While Chippendale is close to Sydney's major transport nexus further consideration is needed in terms of the actual walking distance from Block 4S to readily accessible public transport. In particular, travelling east is likely to present some challenges, due to the potential interface between buses on Broadway and proposed light rail network[15]. Consequently residents/students living at Central Park are likely to rely on CityRail or walk to the nearest light rail stop rather than use the nearest bus stop (circ 330 metres away). If using light rail, the walking distance will be ~ 900-950m (dependent on the light rail stop) and CityRail more than 860 metres away through Devonshire Tunnel (which is at capacity during peak hours and considered unsafe after hours). These walking distances are not considered best practice. Rather good design suggests 400 metres as the appropriate safe walking distance.

Given these factors, we suggest that a revised transport report is necessary so that these inherent issues can be considered (i.e the traffic, transport, walking and cycle interface).

4. *Other challenges*

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.

The correlation between a large number of licensed venues and high concentration of student housing brings with it some inherent risks and challenges.

**E. Concept Approval**

The approval of the Concept Plan in 2007 drew controversy due to its scale and interfaces with what is largely a low rise suburb. The site's subsequent purchase by Frasers led to the Concept Plan's modification in 2009. This followed action in the Land and Environment Court, where the Appeal was withdrawn following a number of design and environmental initiatives.

Key considerations were:

1. The former Brewery site (now called Central Park) as an integral and historic part of Chippendale, rather than the CBD. Specifically the Design Jury report and other reports since have consistently defined the site as an integral and historic part of Chippendale, with a distinct and separate boundary at Broadway. Its primary relationship and interface consistently refers to Chippendale not the CBD.

2. Ensuring sufficient solar access for new buildings - with a minimum standard of 70% applied across the site and 60% for any residential block.

3. Minimizing the impact from a large population on local amenity. This included the decision to locate Chippendale Green on O'Connor Street for the purpose of improving local amenity for existing and incoming residents.

15 Reports for the proposed light rail system show that congestion on the bus routes along Broadway will increase due to the interface and need for buses to turn around.



4. Increasing the amount of open space and public domain in Concept Plan (Mod. 2). This was intended to limit any over-shadowing on the Main Park (Chippendale Green) and provide more green space given the shortage in amenity locally. Specifically residents were told the park was intended for their use and would improve local amenity. Notably the provision of the park was largely achieved by the inclusion of a number of land parcels held by the City of Sydney.

5. Limiting the residential population to about 2,500 residents to lessen the impact on local amenity - to take account of the acute shortage of open space and community facilities, which were found to be the City's lowest.

6. Introducing key design and environmental initiatives for the purpose of achieving a 6 star rating, with a minimum a 5 star rating where a 6 star rating was not possible. These initiatives were intended to limit some of the inherent issues that followed the approval of such a high density proposal. Notably the detailed studies commissioned by the CoS showed the site's density should be no greater than an FSR of 3.5:1 across the site. On the basis of some key design initiatives 4.1:1 may be permitted. Modification 2 subsequently equated to an FSR of 4.4:1. While the Concept Plan introduced a number of key initiatives which were well received, the scale of development and the application of $32M to fund the RWA drew controversy. Notably a commitment was given there would be no further intensification.

7. Limiting parking to 2,000 motor vehicles with no public access. This was intended to reduce traffic to and from the site (given issues that had emerged in relation to Bay Street and Broadway shopping site). Similarly it was proposed that retail activity would be limited and development low key.

8. The increased density on the site would in effect protect local amenity and further development, i.e development outside the site would be restricted, given the percentage increase in dwellings and workers as a consequence of the site's redevelopment.

9. Making sure thoroughfares and public domain areas continue to be publically accessible, particularly with the site's subsequent subdivisions and over the longer term.

10. While estimates were made at the time, the overall population for Central Park at the time of the Concept Plan approval was not provided. However the approval was specifically determined at a minimum of 30% commercial use for the purposes of limiting student and residential housing and making sure the site had a diverse social and economic use.

We note that the approval of the scale and size of the L-shaped Block 1 was particularly controversial; with the then Planning Minister, Frank Sartor giving a commitment he would seek changes from Frasers to reduce the massing of the section along Abercrombie Street. A subsequent change in Ministerial portfolios shortly afterwards prevented further considerations.

Significantly, from the discussions at the time, we had understood student housing would be limited and the retail component kept to a minimum so to limit the impact on local residential amenity.

**F. Director General's Requirements for Block 4S**

The DGR's requires the proponent to address a number of key criteria.

In addition to our previous comments we note the following:

Courtesy City of Sydney Archives

Chippendale Residents Interest Group
Email: chippendalecommunity@gmail.com

## 1. Cumulative Impact

*Proposal for Block 4S*

The EIS report fails to adequately identify the environmental impacts as a consequence of the proposed student housing development (Block 4S). This includes considering the cumulative impact on local residential amenity and other developments in the area. In particular Chippendale faces some inherent challenges: one of the city's highest density; a high transient population and more than half its population relatively new to Australia. Notwithstanding the challenges Chippendale already faces in terms of the lack of open space and local resources, the proposal adds significant challenges in terms of the overall impact it will have from a high concentration of student housing in a small geographical area.

As mentioned previously, a diverse demographic mix is vital for the economic, social and cultural sustainability of a suburb. As such it is essential to ensure an area has a mixture of people from different incomes groups, households and demographics. In the case of Chippendale the inherent challenges are magnified given more than half of its population has recently arrived in Australia necessitating the need for specific resources.

Further, to ensure good planning outcomes, a good mixture of housing is necessary. In the case of the Central Park site 66%[16] of properties are studios or one bedroom units, to the detriment of ensuring a broader social mix. If approval is granted to change the use for Block 4S, 1,100 students will be accommodated on Central Park, in addition to an estimated 4,000 students that will be housed in the area.

In short, while the proponent may seek to vary the Concept Plan to reduce the financial risk, further consideration should be given to alterative options that provide more viable and longer term socially sustainable planning.

*Proposed modifications to the Concept Plan: Land use for Block 1 & the Brewery Yard; and changes to public car parking*

The proposed modification to allow for 25,000 m² of residential use for Block 1 and the Brewery Yard is likely to add to the inherent challenges the suburb already faces in terms of local amenity. While the proponent argues that the modification will allow greater flexibility to respond to market forces and assist with pre-funding, there is little detail in the documents by which an informed assessment can be made. Significantly, there is only a cursory mention in the applications. As such, the proposed modification is largely not known or understood by those who may be impacted. Unfortunately, despite making in enquiries to Frasers, we were unaware the modifications were submitted.

A key element in the decision that led to the approved Concept Plan was the cumulative impact large scale development and a concentrated land use will have on Chippendale. As such, the recommendations for the Expert Advisory Panel (and preceding it the Design Excellence Jury and studies commissioned by the CoS) emphasised the need for a diverse land use, with a minimum of 30% residential and 30% non-residential land use. The proposal to substantially modify the minimum to 23% is a major change to the intent of the Concept Plan.

If the changes are approved, the overall mix would be:

- 77% residential (with 12% of the overall site GFA student accommodation)
- 21% commercial (with more than 11% retail - largely food and beverage; and less than 10% office space).
- 1.5% hotel
- Less than 1% childcare

16 GTA Consultants, December 2012, Traffic and Parking Review (Schedule showing GFA and Housing Mix for MP 06_171 Mod. 8)

This brings with increased intensification of the use of open space and local facilities that are already at a crucial level. 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.

Further, it appears there is an absence of clear and transparent information by which the public can properly consider the modifications. While the proposed change is mentioned in Annexure Z - Economic Impact Assessment Report (EIA report) this document was located in the supporting documents for the proposal for Block 4, not the Concept Plan. In short, there is little information online, and what could be found (after extensive searches) is confusing - e.g. the EIA report refers to 250-300 units whereas the Traffic & Parking Review[17] suggests about 380 apartments (a 27- 52% variance to the EIA report), while one of the plans refers to "*serviced apartments*".

Further changes are proposed for Condition A8. This modification is similarly largely unknown with an absence of sufficient information to consider the application. Given, this condition was an important part of the negotiations that followed the L & E action, and specifically intended to limit traffic to and from the site; the decision to modify the Concept Plan requires further consideration. As such, the proposed modifications to the Concept Plan are not supported, as they are considered premature in the absence of more details by which an informed public comment and assessment can be made.

**2. State Environmental Planning Policy No. 65 (the Design Quality of Residential Flat Development & accompanying Residential Flat Design Code)**

SEPP 65 aims to improve the design quality of residential flat buildings.

*Block 4S*

The proposed accommodation does not deliver on a number of important standards. These include:

- 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

17 GTA Consultants, December 2012, Traffic and Parking Review (supporting MP 06_0171)

- 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)

The proponent argues some key objectives should be waived due to the site's constraints and that student accommodation is typically short term. We appreciate the proponent is keen to reduce the financial risk. Given however the size and scale of proposed Block 4S, it would be difficult to change the internal fit (should there be market decline for student accommodation[18]). Hence it is essential that the outcomes for the SEPP 65 conditions be met.

Further, the likely period of a student rental is likely to be in line with an academic year. This compares to a six month lease for residential accommodation. Notably, the Affordable Housing SEPP makes the case that boarding house accommodation is longer term. Students typically attend tertiary institutions for less than 24 hours a week. In particular a good level of solar access and comfort working is needed in their home environment compared to residents who work full-time or local students who may have the benefit of larger workspaces in a traditional home environment. While a comparison to boarding house accommodation is made, the needs for students are typically far greater in terms of solar access and study requirements. The suggestion good standards can be compromised to suffice for shorter term accommodation is inappropriate and will reflect poorly on current and potential overseas markets.

Further, we understand the requirement to achieve the minimum 5 Star Green Ratings were modified previously in response to the challenges presented by the adaptive reuse of some of the existing heritage buildings. However, in the case of Block 4S, given it is new block, a minimum 5 Star Green Rating should be achieved. While an evaluation report is provided indicating the relevant criteria is met, we question its conclusions given some of the inherent design challenges.

In response to the argument that the site constraints limit better design outcomes, we believe further options could be considered. This includes the redesign of the interface between blocks and massing (for Block 4S, 4N and 1 and potentially Block 8). In meeting with Frasers more recently we raised concerns about the quality of the accommodation and suggested an option would be to reposition/redesign the block(s) to improve solar access and local vistas (through to the Brewery Yard, historic chimney or neighbouring St Benedicts) as well as the massing/ interface between Block 4 and the local streetscape. In response we were told works were underway, suggesting changes could not be made. While we understand the challenges this presents, improvements now which benefit the longer term should be considered.

**Design Statement**

In addition to our previous comments we note the following:

*Context and Scale*

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. We note it appears there is a disregard that the site is an inherent part of Chippendale. Instead reference maps (e.g. in Fraser's sales office and documents online) consistently show the site and east side of Chippendale as the CBD and incorrectly name Darlington as Chippendale.

---

18 International student enrolments peaked in 2009, and have subsequently declined by 18%.
Refer https://aei.gov.au/research/International-Student-ta/Documents/INTERNATIONAL%20STUDENT%20DATA/2012/2012%20Time%20Series%20Graph.pdf



While we appreciate the massing was approved in the Concept Plan, it would be useful to consider design changes to the western façade (on Abercrombie Street) to better integrate with St Benedicts, and reduce the scale of the massing and visual relationship on the local streetscape. One suggestion raised with Frasers is to introduce/integrate a green wall on the western façade so to soften the visual impact and introduce "green" elements into the local streetscape.

*Built Form and Aesthetics*

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 Benedicts. 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.

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).

Further variation to the built form for the façade (in particular the western façade) could be visually improved by the 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.

*Density*

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.

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.

*Resources, Energy and Water*

We reiterate our previous comments in relation to concerns that the proposal fails to meet the relevant solar design principles or provide sufficient open space. Given the extent and scale of the development, it is essential both objectives be met so to provide proper student amenity and limited the detrimental impact on local amenity and resources.

*Landscape*

The proposal fails to meet the deep soil/soft landscaping requirements. Further, the proposal does not provide student balconies. While the inclusion of open space and communal facilities such as vegetable gardens on level 13 is welcome, these facilities are insufficient to offset the shortage of external balcony areas and open space, given its corresponding impact on local amenity and resources.

The Design Statement argues that the landscaping principles cannot be met due to the site's limitations as an infill site. While the site is an infill site, the size of the site is sufficiently large enough to cater for more public domain and deep soil planting. The decision by the proponent to seek to optimise their financial return should not preclude good design outcomes.

In particular we note a previous application for low cost student housing for a student block housing on nearby Blackfriars Site was withdrawn following concerns about similar challenges.

*Amenity*

Previous concerns about solar access and amenity are emphasised. Further we note the proposal does not achieve then necessary visual privacy, without compromising amenity. Similarly, adequate storage facilities in each room are not provided. The concept of using storage in the basement to supplement the absence of adequate storage in the each room is not supported. Further, natural and cross ventilation is compromised by virtue of the site's location alongside one of the City's most congested arterial roads. This is discussed in detail further in the submission). Likewise we reiterate our comments about the necessity to rely on privacy screens. This obscures visual amenity and comfort.

Further, the proposal suggests a retail tenancy for outdoor "alfresco" dining on the eastern façade (at ground level). We note the acoustics report appears to indicate that optimal sitting outside may not be appropriate in this location. Other documentation suggests tenancies on the western façade will not be able to utilise outdoor space given inherent issues around noise and traffic pollution on Abercrombie Street. Notably the Safety Report suggests that retail space is likely to be used for restaurants/cafes with extended hours as part of a "night zone". While operating hours are not defined as part of the application, the Safety Report makes reference to trading hours between 7am to 11:30pm, 365 days a year (Page 54). This is likely to have a significant impact on local amenity - in particular nearby homes and apartments on Abercrombie, Blackfriars, O'Connor and Dick Streets. Yet these plans are not widely known or have been disclosed. We note Abercrombie Street is traditionally not a retail strip and the introduction of retail space (i.e. food and beverage venues) in this location has traditionally not been supported. Given legislation has now been passed which allows small bars to be approved without the traditional process and the proposed changes to the NSW planning system, concerns are held that future applications may be approved without resident's input. As such, we suggest this application requires further input before any approval.

*Social Dimensions and Housing Affordability*

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.

*Safety and Security*

Documentation supporting the proposal suggests that the proposal may necessitate a reduction in some of the fire ratings on the basis they are considered onerous. Given the scale of the proposal and that student accommodation is likely to attract a greater risk; we suggest this requires further consideration. Further we reiterate concerns about the

introduction of a retail strip along Abercrombie Street (which has been previously discussed).

**3. Development Near Rail Corridors and Busy Roads - Interim Guideline**

The guideline provides best practice advice for new development adjacent for busy roads, where average annual daily traffic is over 20,000 vehicles. The proposed student block is directly adjacent to Abercrombie Street and within close proximity to Broadway. Both roads are classified as having over >40,000 AADT for the purpose of State Infrastructure developments and require adherence to best practice.

This guidelines state that development should only occur where adverse noise and air quality impacts of the road can be minimised and good quality high amenity residential developments are created. The EIS report fails to adequately highlight the key challenges that will result from the changes from commercial to student use. This includes the impact on EDS outcomes and green star ratings.

Specifically the acoustics report states that *"the recommended internal noise levels cannot be achieved with windows open within the development. In response an alternative outside air supply system or air conditioning will be required"* to be meet the relevant requirements. The report similarly states that *"the proposed tenancies on the ground floors will require an alternative ventilation or air conditioning system to maintain adequate ventilation with the windows closed".*

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.

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 modeling 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.

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).

**4. Economic Impact Assessment**

The EIA report suggests accommodation for Block 4S is targeted for international students *"with a component of student accommodation that is designed to meet affordability targets"* and has *"been supported by the National Rental Affordability Scheme."* Reference is also made that the housing will *"adhere to both Federal and State Government policy objectives associated with the provision of new affordable dwellings"* It is not clear if the housing in Block 4S is eligible to the NHRS scheme or rather will adhere to the objectives of the scheme. Irrespective, the EIA report presents the case on the premise that the student housing is *"affordable housing"* and consequently will *"free-up between 300 - 400 dwellings in surrounding rental markets, effectively increasing rental supply in adjoining suburbs."* Our research indicates the



assumptions made for housing occupancy are conservative; therefore the numbers of dwellings that will "free-up" are overstated. Further, the affordability of purpose built student housing is not adequately considered; e.g. accommodation rates of 334 to $588/week rates for student housing is not financially viable for large parts of the student market when compared to share accommodation at say $200/week. The COS's research[19] reinforces the premise; that unless rental tariffs are below market rates, current demand for residential housing is not alleviated. In short, the proposed discount of 20-25% (in line with the National Rental Affordability Scheme) is unlikely to significantly reduce local demand; rather Block 4S will largely translate to additional student numbers of top of an existing high residential student population base.

Further, the EIA report estimates an undersupply of 19,722 beds on the premise of 24,261 international student enrolments in nearby institutions in 2010. We note the data should consider student numbers not enrolments[20]. Notably, student numbers have declined since a peak in 2009, with current enrolments about 22% less. The COS estimate international student numbers to be ~15,000 (in 2010) across the City's LGA, with half living outside the area. This includes Homestay, private dwellings, arrangements with relatives and on-college accommodation. Further, nearly 4,000 beds have been approved in recent years for purpose built student housing in the area. In addition there is a strong uptake of share rental accommodation, Homestay and on-college accommodation. As such the accommodation demand is substantially shifting.

We also note the impact a high concentration of student housing has on local businesses; e.g. the average income for ABS statistical area for Regent to Lee Street (which is now largely student housing) is less than 50% of single household income in Chippendale, compared with 16% for a couple or 12% for families. The corresponding limited expenditure not only impacts social substantiality but also the viability of local businesses, yet increases demand on local amenity and resources.

Likewise, the introduction of office accommodation in the Concept Plan was intended to minimise the impact a concentrated demographic would have on Chippendale. Its 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.

In summary the proposal(s) fail to consider the inherent underlying challenges that Chippendale already faces - they do not protect or enhance Chippendale's overall character and ensure equitable access and livability. Rather they compromise local amenity and the suburb's long term sustainability and social mix.

**5. Affordable Housing**

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 shared housing locally (due to the cost differential); and rather the introduction of student housing blocks has increased student accommodation impacting Chippendale's longer term social sustainability. Our previous comments also detail the impact in terms of economic and social sustainability. In particular we note the impact on intergenerations has not been considered. Notwithstanding this, if approval for the proposal is to be considered, the consent conditions should be subject to the proposal's eligibility for the NRAS and relevant approval, prior to the issue of a construction certificate.

---

19 City of Sydney, October, 2011, Submission to Social Policy Committee, NSW Parliament Inquiry into International Student Accommodation in NSW

20 Explantory notes, Australian Government (AEI). Guidelines for renorments vs studetns (studens are often enrolled in ELICOS courses as well as Bachelor/Postgraduate degrees). https://aei.gov.au/research/International-Student-Data/Pages/ExplanatoryNotesforAEIStudentEnrolmentData.aspx



**6. Land Use**

The EIA report suggest the calculation of the precinct's non- residential uses is blurred, on the premise that student housing is a specialist business service (Class 3, Boarding House) rather than residential (Class 2, Strata private). The proponent also argues that the application should be considered under the Affordable Housing Scheme as well as Boarding House accommodation. As such the key purpose is residential accommodation, rather than a tax interpretation.

**G. Project Application Blocks 1 & 4 (Mod.08_0253 Mod. 4)**

1. 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 interlay 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.

2. 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.

3. 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.

**4. Modifications to the Concept Plan (MP06_0171 Mod. 8)**

1. The economic impact report suggests: *"A separate provision is sought to replace a second component of approved commercial space (also equivalent to 25,000m²) with a project comprising 250 to 300 apartments. Project construction would be aimed to commence in 2014."*

   As discussed previously, this modification is not supported given a. the absence of sufficient information as part of the modification process and its potential impact on local amenity.

2. The application proposes to modify Condition A8 of Schedule 3 contained in the Approval (MP 06_0171 MOD 2). Condition A8 states that public car parking facility is not included in the approval as follows:

   *"The Concept Plan is modified so that no approval is granted for public car parks and shall not be included in any subsequent future project application or development applications."*

   *The proponent is considering future opportunities to provide a 100 space public car parking facility using the parking allocation from Blocks 1 and 4N commercial uses during after-hours when the commercial allocated parking spaces are not in use. The proponent will assess the merits of the proposal with consideration to any issues raised by the local community and authorities. If appropriate, the proposal would be formalised in a future S75W application with appropriate justifications.*

   *In the light of the above, it is proposed to modify Condition A8 as follows:*

   *"The Concept Plan is modified so that no approval is granted for public car parks. and shall not be included in any subsequent future project application or development applications."*

   *As stated above, the inclusion of the public car parking facility will not result in additional car parking spaces provided, but instead will utilise the parking allocation from the commercial uses*

*within Blocks 1 and 4N. The proponent is committed to limit the number of car parking spaces to a maximum of 2,000 parking spaces consistent with Condition B5 in the approval MP 06_0171 MOD 2".*

The inclusion of this condition was a key requirement in the Concept Plan. Its potential change at this time is not supported, without further investigations and a public exhibition process. As such, the modification is not supported.

**From:** "Don Acret" <dandhacret@bigpond.com>
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 4/28/2013 4:30 pm
**Subject:** Objection Planning Changes Central Park

We are residents of Chippendale having owned a house in the suburb for almost twenty years. While a keen supporter of the overall concept and planning of the Central Park development ,we are very concerned about the developers application to seek approval to change completely Block 4S to provide accommodation for 826 students. Such an increase in student accommodation will result in an increased demand on the limited public facilities and amenities. When processing such an application consideration must be given to the very large amount of student accommodation already provided in and in close proximity to Chippendale combined with that already approved and being constructed.

We are also concerned about the design and size of the proposed building and its impact on the historic St. Benedict's church and its domination of the overall streetscape, and the mix of such a large number of people with the over forty approved licensed venues.

Regards

D And H Acret

**From:** >
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 5/2/2013 11:55 am
**Subject:** Student Housing in Central Park - SSD5700-2012 Block 4S

Dear Caroline**

*Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING*

I live in Chippendale and raise the following concerns.

1. 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 for student housing is an intensification of the use and significant departure from previous representations. The current proposal is not supported.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Regards

## Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

**From:**
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 4:34 PM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

Dear Caroline

Objection: SSD5700-2012 Block 4S, Central Park, Chippendale
I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.
2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.
5. 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.

6. 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.

The application in its current form is not acceptable. I would also appreciate if my personal details are not made public.
Regards

## Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 4:21 PM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

Email: caroline.owen@planning.nsw.gov.au

Dear Caroline

**Objection: SSD5700-2012 Block 4S, Central Park, Chippendale**

I would also appreciate if my personal details are not made public.

I understand the proponent is seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities and retail shops. I live in Chippendale and raise the following concerns.

1. 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.
2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

   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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would also appreciate if my personal details are not made public.

Regards

**Caroline Owen - Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 3:09 PM
**Subject:** Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING
**CC:** <sydney@parliament.nsw.gov.au>

Dear Caroline Owen

**Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**
I am a resident in Chippendale and I want to raise the following concerns:

1. 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 for student housing is an intensification of the use and significant departure from previous representations. The current proposal is not supported.
2. 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. 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.

3. 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.

4. 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.
5. 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.
6. Lastly, 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.
Regards

## Caroline Owen - Central Park Student Housing

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 5/05/2013 6:20 PM
**Subject:** Central Park Student Housing

Dear Caroline

**Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**

I live in Chippendale and I am very concerned about the following issues.

1. 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 for student housing is an intensification of the use and significant departure from previous representations. The current proposal is not supported.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Regards

**Caroline Owen - Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**

**From:**
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 4:47 PM
**Subject:** Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING

Dear Caroline

**Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**

I live in Chippendale and raise the following concerns.

1. 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 for student housing is an intensification of the use and significant departure from previous representations. The current proposal is not supported.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Regards

Sent from my iPhone 5

# Caroline Owen - CENTRAL PARK - URGENT

**From:** "
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 5:45 PM
**Subject:** CENTRAL PARK - URGENT

**CONFIDENTIAL**

Dear Caroline

**CENTRAL PARK – BLOCK 4S, BLOCK 4N AND CHANGES TO THE CONCEPT PLAN**

I am a long term Chippendale resident and live with my family in close proximity to the site. I would appreciate if you are able to accept my late submission. I make the following comments:

**Block 4S and Block 1**

1. The proposed change of use from commercial uses to residential uses will have a detrimental impact on local amenity because of the overall commercial and residential ratio within Central Park. They are not supported.
2. I have concerns about the excessive supply of student accommodation in Central Park and overall disparity between student accommodation and the local population. I note the count estimated by Chippendale Residents Interest group is potentially superseded by a proposal by Lend Lease which is now on exhibition (for more accommodation in the nearby area). This potentially adds about another 1,000 students to the area. Assuming Block 4S was approved this would result in student purpose built housing for about 5,000 students in close proximity to Central Park. This is an unfair constraint on the amenity of the area for existing and future residents (who will be moving into Central Park shortly). In particular I draw the Department's attention to the lack of community resources and open space. The concept of a large number of licensed venues along with the high number of students is unreasonable and contrary to good planning decisions. This is also contrary to previous representations made. While Chippendale zoned mixed use, this in part is a legacy of previous planning where the area around the site was largely industrial. Further, the intention of various state government planning controls is not to overlay a high amount of student housing on an existing residential population. While I am supportive of the concept of affordable housing, any further student housing (including that proposed here) should be located in another locality close to the area, which can sustain the increase in student population. To do so here in Chippendale would be unfair.
3. Inappropriate built form for the block. In particular issues in relation to noise/solar and air quality which are mentioned in the CRIG submission.
4. The potential use of the ground floor premises for cafes and licensed premises. I note concerns, that the new planning system may subsequently limit input for development applications and ask if the Department can impose relevant restrictions whereby the ground floor is not used for food and beverage areas (as indicated in the safety report). I also note the potential impact that idling traffic would have on the shops and outdoor areas on the western façade.
5. Onsite managers. I note the safety report suggests adequate onsite accommodation is not provided for an onsite manager 24/7. I do not support the use of students as onsite managers (given the amount of accommodation that is proposed). I believe it is essential that at least two onsite managers be onsite after hours rather than rely on a security guard(s) who may be elsewhere on site.
6. In relation to level 13 outdoor area, I believe a 8pm limit should be imposed to limit the impact on local residential amenity (I note that due to the local cubic form, acoustic impact is often heard much further away than would be the case in suburban areas or even other inner city areas - where open space reduces the noise impact).
7. The location of a food and beverage area to the rear (eastern façade) has wind implications. This has not been property considered.
8. The visual integration of the building on Abercrombie Street should be improved – to break up the large

façade and better integrate with the exiting streetscape opposite. I support the comments CRIG have made in this regard.

9. Proposed bike path up Abercrombie Street – I have no knowledge of this (it contradicts my discussions today with the City of Sydney). I ask that this be considered with appropriate community input before any decision is taken about this application, as the number of potential cyclists will have an impact on local residential amenity and traffic.
10. The economic impact assessment has incorrect data. I also note the proposed rental is not "affordable" and will cause financial stress.

**Block 4N**

1. I do not support the loss of the publically assessable walk through from Building 4N to the public domain area near Block 4S.
2. Notwithstanding concerns about the service access point, in particular I have concerns about drop off access for childcare centre (through the loading dock and interface driving off Abercrombie Street has; e.g. parents with babies may be distracted as they access the driveway through a high pedestrian area near 2 sets of pedestrian lights).
3. Insufficient details have been submitted for the proposed use of upper levels of Blocks 1 and 4 North for function use. This use could result in adverse amenity and traffic impacts. Any change / approval is premature, ie it should be made with a properly informed submission (I note the changes are not widely known as there is little documentation on this). In my discussions with the proponent on several occasions it was not mentioned.
4. I do not support the proposed vehicular access onto Abercrombie Street for service vehicles as it will result in unacceptable traffic impacts.

**Changes to the Concept Plan**

1. The changes from commercial to residential use are not supported. Any change should be made with a full application (should be made with the modifications not prematurely). This includes changes to the brewery yard.
2. The potential change to introduce public parking is not supported. I support the comments made by CRIG in this regard.
3. I have concerns about access to the publically accessible areas across the site. In particular I note future applications may be made to limit access in walkways between or though buildings and believe this requires closer scrutiny.

I assume this application will go before the Planning Assessment Committee and would appreciate if you could notify me of the same so that I and others can attend.

Regards

# Caroline Owen - Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

**From:**
**To:** <caroline.owen@planning.nsw.gov.au>
**Date:** 5/05/2013 10:44 PM
**Subject:** Objection: SSD5700-2012 Block 4S, Central Park, Chippendale

Dear Caroline,

We believe that there is a deviation to the original Fraser development application.
They are now seeking approval for a high rise student housing block on Abercrombie Street that will provide 826 beds, student facilities.
We were not notified and have only learnt about it accidentally.

We strongly disagree with this proposal!
We also strongly oppose to the way in which it seems to be passing through the system virtually unnoticed.

Can you tell us if all the purchasers of the new Fraser residential apartments have been notified of this complete change from the original concept ?

The original Concept Plan was approved for commercial use.
The proposal has now been altered from commercial use to student housing.
This is a significant departure from previous representations.

The applicant is also seeking approval on the basis of boarding house controls.
We are at loss to understand how the council which we have supported over many years can accept this, suggesting that some key provisions under SEPP 65 do not need to be met.

We do not want future slums. We do not want students to live in sub-standard conditions.
Chippendale has a unique opportunity to be a community that provides city living as well as a village atmosphere, where people are important.

We understand there are number of other student housing blocks have been approved in recent years - Cleveland Street, Regent Street, Wattle Street, Harris Street, Quay Street and student housing has already been approved for Blocks 3B, 3C and 10 on Central Park,
and with the proposal for yet another 826 beds in the immediate area is too high and will have a huge impact on all local amenities!

More careful consideration needs to be undertaken.

There is a unique opportunity to obtain the right balance for this wonderful site, so close to the city but with a residential and commercial mix.

Please don't accept this short term, short sighted economically driven application.
**It is entirely unsuitable and unsustainable.**

We reiterate that we strongly oppose this application.

Could you please keep us informed of all future developments regarding this application.

Kind regards,

**Caroline Owen - Block 45 student housing**

**From:** Susan Quine <susanquineis@yahoo.com.au>
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 5:17 PM
**Subject:** Block 45 student housing

Dear Caroline
I am writing to strongly object to the student housing proposal SSD5700-2012.
This proposal is totally inappropriate being grossly oversized in size and scale.
Also importantly is the fact that it fails to consider the impact on, and needs of, the local community - of which I am one.
Please reconsider.
With thanks
Dr Susan Quine
37/9-27 Moorgate Street
Chippendale 2008

**Caroline Owen - Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**

**From:**
**To:** "caroline.owen@planning.nsw.gov.au" <caroline.owen@planning.nsw.gov.au>
**Date:** 2/05/2013 4:43 PM
**Subject:** Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING

Dear Caroline

**Objection: CENTRAL PARK - SSD5700-2012 Block 4S - STUDENT HOUSING**

I live in Chippendale and raise the following concerns.

1. 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 for student housing is an intensification of the use and significant departure from previous representations. The current proposal is not supported.

2. 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 sub-standard 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 typically are at "home" longer than residents who work full-time.

3. 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.

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.

4. 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.

5. 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.

6. 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.

The application in its current form is not acceptable. I would appreciate if the Department could keep me informed as to any future developments. I would also appreciate if my personal details are not made public.

Regards