

13 March 2018

14395

Ms Carolyn McNally
Secretary
NSW Department of Planning and Environment
320 Pitt Street, Sydney NSW 2000

Attention: Tim Green (Planner, Modification Assessments)

Dear Tim,

**Response to Submissions – Section 4.55 Modification Application – SSD 6724 MOD 3
60-78 Regent Street, Redfern**

Further to your email dated 6 March 2018, we have reviewed the submission provided by the City of Sydney Council in relation to the abovementioned modification application and provide the following response:

Internal size

We note that Council's submission confirms that the room size of the studios complies with the City of Sydney Development Control Plan 2012 (DCP) minimum size requirements for two occupants.

Table 1 below sets out a schedule of all communal indoor spaces provided within the approved and constructed facility. This includes the Level 1 communal area, as well as communal areas provided for cluster units. Measured plans supporting these calculations are provided at **Attachment A**. Based on these calculations a total of 1,160.8m² of internal communal space is provided, or 2.55m² per occupant which is well in excess of the 1.25m² DCP control.

Table 1: Schedule of internal communal areas

Communal Space	Area (NSA) – refer to note below
Level 1 – General Internal Communal	467m ²
Level 1 – 5-bed cluster	16.6m ²
Levels 2-5 – Southern 6-bed cluster	14.6 x 4 levels = 58.4m ²
Levels 2-5 – 4-bed cluster	12.8 x 4 levels = 51.2m ²
Levels 2-5 – Northern 6-bed cluster	14.7 x 4 levels = 58.8m ²
Levels 6-17 – Southern 6-bed cluster	14.6 x 12 levels = 175.2m ²
Levels 6-17 – Central 6-bed cluster	12.9 x 12 levels = 154.8m ²
Levels 6-17 – Northern 6-bed cluster	14.9 x 12 levels = 178.8m ²
Total:	1,160.8m² / 455 occupants = 2.55m² per occupant

Note: In accordance with Section 4.4.1.4 of the Sydney DCP 2012, indoor communal areas "can include any dining area, but cannot include bedrooms, bathrooms, laundries, reception area, storage, kitchens, car parking, loading docks, driveways, clothes drying areas, corridors and the like".

*Cluster bedrooms provide communal dining and lounge areas (included) and kitchen areas (excluded) in a combined space. Accordingly, a 1-metre wide area from the edge of the kitchen has been excluded from the communal area calculations as demonstrated at **Attachment A**.*

We also note that the facility is provided with 328m² of secure communal outdoor space. This is well in excess of the DCP minimum of 20m² therefore this further demonstrates Iglu's commitment to providing quality areas for residents to interact and enjoy.

Laundry facilities

We note that the current laundry provision is less than the required provision under Section 4.4.1.5 of the DCP. We wish to reiterate that the provisions of a DCP do not apply to State Significant Development in accordance with Clause 11 of *State Environmental Planning Policy (State and Regional Development) 2011*. Furthermore, the DCP provision applies to both purpose-built student accommodation and boarding house developments, which have entirely different day to day operating and occupancy conditions.

The provision of laundry facilities was considered in detail by the (then) Planning Assessment Commission (PAC) during the determination of the original Development Application, with the PAC concluding that non-compliance with the DCP rate was acceptable and that the proposed (now constructed) laundry facilities were adequate.

In the information provided by Ethos Urban to the PAC, we noted the following comments from the Department's assessment of a modification to the student accommodation development at Block 4S Central Park, Chippendale (SSD 5700-2012 MOD 1):

- *the provision of 26 washing and drying machines for 770 students is consistent with the previously approved ratio of 1:29.5;*
- *other student accommodation developments within the Central Park development operate successfully with laundry facilities at a ratio of 1:45 and 1:50;*
- *each machine is to be between 8-9 kg which exceeds the SDCP 2012 requirement of 5 kg; and*
- *the proposed machines to be installed are designed to ensure water efficiency, reduced waste and user wait times.*

In addition, a letter of support was provided to the PAC during the assessment of the original application from UniLodge in relation to the Block 4S application at Central Park, which notes that across its portfolio of 2,338 beds their ratio of 1 washing machine/dryer per 53 beds operates without issue.

A total of 9 washing machines and 10 dryer machines are currently installed on the Iglu Redfern premises. We also note that Iglu do not expect couples to occupy all the studio rooms, and for those that do, it is anticipated they will largely share washing loads. Based on a **maximum increase** in occupancy from 370 to 455, the ratio of occupants to washing machines would change from 1:41 to 1:50. Based on Iglu's historical statistics of usage from Iglu Chatswood, Iglu Central Park and Iglu Brisbane City this provision is considered more than adequate to support the laundry requirements of the maximum proposed occupancy.

Conclusion

We trust that the Department is now able to proceed to complete its assessment of the Modification Application and determine the application. Should you have any queries please do not hesitate to contact Luke Feltis via the below details.

Yours sincerely,



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Attachment A: Measured Plans – Internal Communal Areas