

9 February 2016

File Number: 2016/042311  
Our Ref: R/2015/26/B

Matthew Rosel, Consultant Planner, Key Site Assessments  
NSW Department of Planning and Environment  
Sydney NSW 2000  
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Dear Matthew,

**RE: State Significant Development 7133 – Response to Submissions,  
Building W1 Student Accommodation, Darling Drive Plot, Sydney International  
Convention, Exhibition and Entertainment Precinct**

I refer to your correspondence received on 28 January 2016 informing Council that the applicant has prepared a response to submissions regarding the State Significant Development Application SSD 7133 for Student Accommodation at Building W1, the Darling Drive Plot, SICEEP.

The proposal remains, in the City's view, un-approvable given the inadequate responses.

We have reviewed the Response to Submissions Report and the supplementary documentation and find the responses disappointing. We note that key concerns regarding departures from good design (including the State's own Affordable Housing SEPP) have not been satisfactorily addressed. On that basis, we strongly object to the proposal in its current format.

Attachment A is a table summarising the City's review of the Response to Submissions. The table nominates the issues raised within the City's original submission, discusses the applicant's response to the issues raised, and outlines the City's sustained contention in relation to the project where applicable.

Should you wish to speak with a Council officer about the above, please contact Christopher Ashworth, Specialist Planner, on 9246 7757 or at [cashworth@cityofsydney.nsw.gov.au](mailto:cashworth@cityofsydney.nsw.gov.au).

Yours sincerely,



**Graham Jahn AM**  
**Director**  
City Planning | Development | Transport

## ATTACHMENT A

### REVIEW OF RESPONSE TO SUBMISSIONS

Issue	Applicant's Response	Issue Addressed?	City's Contention
<b>General Amenity</b>			
<p>The proposed separation distance between the two buildings is only 10m, which is likely to result in reduced acoustic and visual privacy between rooms that face on to one another. While it is noted that the building envelopes were approved under the Concept Plan Approval (SSD 13_5878), mitigation measures should be incorporated to improve privacy for residents in the affected rooms. At a minimum, screening devices or angled windows which prevent overlooking should be incorporated into the design.</p>	<p>The proposed separation distance between Buildings W1 and W2 of ten metres is consistent with the approved parameter plan under the Stage 1 Concept Proposal (SSD 13_5878). Key design features have been incorporated into each building to ensure that sight lines from windows are distributed away from other apartments and any direct sightlines are avoided. Within Building W1, only a single apartment per level from Level 2 upwards has a single aspect orientation towards Building W2. All other apartments only have secondary windows on the southern façade fronting Building W2.</p> <p>Additional design features such as a recessed window, screening devices and internal blinds have been adopted for these single aspect apartments, and all other windows on the southern façade of Building W1 to mitigate any</p>	<p>No</p>	<p>The stage 1 maximum building envelopes do not give permission for privacy and other concerns to be ignored or dismissed during subsequent detailed applications.</p> <p>The revised drawings do not indicate there are any changes in terms of privacy treatments to the southern facade of the building.</p> <p>The City's concerns remain unaddressed.</p>

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	potential privacy impacts. On balance, it is considered that an appropriate outcome has been achieved through careful design and limitation of single aspect apartments with an orientation to Building W2.		
It is noted that only 80 rooms out of 520 are naturally cross ventilated. The City does not accept the argument that this is acceptable because the rooms are small. It is recommended that the design be amended to improve natural cross ventilation.	<p>Building W1 has been designed to provide optimal cross ventilation in a cellular typology. Being a Class 3 building, cross-ventilation is a desired, rather than legislated, outcome. The common corridors on each floor are naturally ventilated through three (3) openings on west, east and south facades, and the two storey height common rooms in the centre of the plan, providing excellent opportunity for cross-ventilation.</p> <p>Apartments located on corners of the corners of the building are provided with windows to two orientations ensuring cross-ventilation. An opening area of 5% of the floor area of each room is provided to every bedroom to ensure adequate ventilation, and are designed to have cross ventilation by utilizing windows of 1500mm high.</p>	No	<p>Legislation should not be necessary for all classes of building to achieve passive climate measures to reduce energy consumption and lifecycle operating costs, and to improve the lives of occupants.</p> <p>The entire project was said to offer high standards of environmental design.</p> <p>The City's original comments remain unaddressed.</p>

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<p>Sections provided show floor-to-floor heights of 2.9m. A floor-to-ceiling height of 2.7m requires a minimum floor to floor height of approximately 3.1m. Given the low ceiling height and lack of natural cross ventilation the amenity of the rooms is considered quite poor, therefore amendments to the ceiling heights should be made.</p>	<p>Building W1 has been designed with a floor to floor height of 2920mm resulting in a general room ceiling height of 2720mm. The ceiling height has been raised a nominal 20mm to ensure the minimum ceiling height of 2700mm required by authority requirements and applicable construction codes (with additional buildability tolerance).</p>	<p>No</p>	<p>The City is of the view that floor to floor heights should be 3.1m in order to future proof the 2.7m floor to ceiling heights for habitable rooms.</p> <p>We remain concerned that it will not be possible to achieve 2.7m within a floor to floor height of 2920mm.</p> <p>The consent authority should carefully consider the likelihood of 2.7m floor to ceiling heights being achieved to:</p> <ul style="list-style-type: none"> <li>a) prevent future modifications to increase the floor to floor heights and therefore the overall height of the building in order to provide necessary services; or</li> <li>b) lower floor to ceiling heights which will further exacerbate poor amenity.</li> </ul>

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<p>It is noted that communal kitchen facilities are not provided. It is recommended that communal kitchen facilities be provided in accordance with the Sydney DCP 2012 in order to give students the choice of cooking their own food, rather than being solely reliant on the canteen facility.</p>	<p>Buildings W1 and W2 are considered as one integrated facility. If students prefer self-catered accommodation, the adjacent Building W2 facility has ample accommodation. Building W1 is an innovative and pioneering reinvention of catered university dormitory style accommodation. Catering is fundamental to the proposal and the concept will only work with patronage through all-inclusive offering.</p>	<p>No</p>	<p>The City does not support the argument that implies residents should be denied the ability to prepare their own food if they wish/need to ensure the profitability of the canteen facility.</p> <p>The City's original comments remain unchanged.</p>
<p>The communal laundry proposes a total of 10 washing machines, which falls well short of the 58 required by Sydney DCP 2012. It is also unclear what drying facilities are available. The City recommends compliance with the DCP laundry facility requirements, including number of washing machines, washing tubs and clothing lines.</p>	<p>Urbanest has undertaken a review of laundry facilities in two of their Melbourne based facilities (refer to Appendix C). This review has identified that on average, students will use a washing machine 0.45 times per week and dryers 0.4 times per week. If this figure was to be extrapolated to the proposed Building W1 development, a total of seven (7) washing machines and 5.4 drying machines would be required. The proposed provision of nine (9) washing machines and ten (10) drying machines satisfies this minimum requirement and ensures</p>	<p>No</p>	<p>No information has been provided regarding washing tubs and clothing lines, we therefore assume that these essential facilities will not be provided.</p> <p>The proposed provision of one washing machine per 76.4 residents and one dryer per 68.8 residents is clearly insufficient, and will be greatly exacerbated if any of the machines were to be out of service.</p>

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	that students will be adequately serviced.		The City's original comments remain unchanged.
<p>Internal common corridors on Levels 2 to 17 are between 1.1m and 1.3m in width, with areas in front of lifts being approximately 1.9m. Very little natural light is available to these spaces. Common corridors should be designed to provide a feeling of spaciousness and have access to daylight.</p>	<p>The internal corridors are a minimum of 1150mm wide which achieve minimum requirements. However, a larger width of 1550mm wide is achieved at approximately 44% of the length of corridor (to entry door recesses), and compliant turning circles for accessibility area provided at ends of corridors.</p> <p>Windows at the ends of corridors to the west, east and south façade admit light and air for increased amenity. The lift lobby and common room on each level is a large double height space providing maximum light and ventilation.</p> <p>Corridor length and path of travel is functionally reduced through the use of double hold-open doors to the egress stairs, allowing a "short-cut" to the other side of the building. The corridors will have good amenity for residents due to the variation in widths, articulation of entries, access to light</p>	No	The City's original comments remain unchanged.

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	and air, and additional circulation paths.		
<b>Affordable Rental Housing SEPP</b>			
<p>The Secretary's Environmental Assessment Requirements (SEARs) require the applicant to address the statutory provisions contained within State Environmental Planning Policy (Affordable Rental housing) 2009. Division 3 'Boarding Houses' outlines the development standards that apply to boarding houses, and separates them into 'standards that cannot be used to refuse consent', and 'standards for boarding houses'.</p> <p><b>Room Sizes:</b> The minimum room sizes are contained within Clause 29 'Standards that cannot be used to refuse consent', which states:</p> <p><i>'each boarding room has a gross floor area (excluding any area used for the purposes of private kitchen or bathroom facilities) of at least:</i></p> <p><i>(i) 12 square metres in the case of a boarding room intended to be used by a single lodger, or</i></p> <p><i>(ii) 16 square metres in any other case.</i></p>	<p>Whilst the accommodation sizes stipulated in the AH SEPP are measurable standards, they are not 'development standards' in that they do not set a strict requirement or fixed standards for the development which must be achieved, rather they are a tool for consent authorities to determine the appropriateness of a proposal without need for further assessment. Given the above, it is considered that a SEPP 1 Objection is not required.</p> <p>Section 5.8.1 of the exhibited EIS provided a comprehensive analysis of the proposed room sizes and the significant communal open spaces being provided for residents through the delivery of Buildings W1 and W2.</p> <p>The room sizes proposed are generally consistent with those approved within Building W2 and other comparable student accommodation developments</p>	No	<p>The City maintains our strong objection to the proposed room sizes.</p> <p>The proposed room sizes are so inadequate that comparisons can be drawn with maximum security prison cells at Parklea Correctional Centre, which are 9.1m<sup>2</sup>, only 1.8m<sup>2</sup> smaller than the single rooms proposed in this facility.</p> <p>If the scheme was amended to be compliant, we estimate that the loss in yield will be approximately 36 single rooms in total. This will result in the total number of beds provided in buildings W1 and W2 being 1267. This is still far in excess of the 1,000 beds envisaged under the Concept Plan Approval (SSD 13_5878).</p> <p>In light of the above, and for the reasons outlined in our original</p>

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<p>Accordingly, if room sizes do not comply with the minimum standards, that is sufficient grounds for refusal.</p> <p>520 rooms are proposed, comprising two room types:</p> <ul style="list-style-type: none"> <li>• a single room with a Gross Floor Area (GFA) of 10.9m<sup>2</sup> (excluding bathroom); and</li> <li>• an twin share room with a GFA of 19.1m<sup>2</sup> (excluding bathroom).</li> </ul> <p>While the twin studios comply with the minimum requirement of 16m<sup>2</sup>, the single rooms do not comply with the minimum requirement of 12m<sup>2</sup>, falling short by 1.1m<sup>2</sup>.</p> <p>While the minimum room size development standard is prescribed as a standard that cannot be used to refuse consent, in accordance with the definition provided in Clause 4(1) of the Environmental Planning and Assessment Act 1979 it is a development standard nonetheless. Accordingly, any variation to the minimum standards prescribed can only be considered by the consent authority if the application has been accompanied by a SEPP1 Objection seeking to vary the development standard.</p>	<p>in major cities. Students will have direct access to a variety of different communal open spaces to fulfil all needs. Furthermore, the location of the proposed development is one of the most central in Sydney, with direct access to services and facilities in the new Darling Square development and the nearby Sydney CBD.</p>		<p>submission, the City strongly recommends that the room sizes be increased to comply with the 12m<sup>2</sup> minimum requirement. Alternatively, the application should be refused as facilitated by the SEPP.</p> <p>We are of the view that approval would set a highly undesirable precedent for boarding houses with wide ranging implications throughout Sydney and beyond.</p>

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<p>The SEPP 1 Objection submitted with the application seeks to vary only the bicycle/motorcycle parking development standards, not room sizes, and therefore the consent authority is not able to consider the proposed variation.</p> <p>Notwithstanding the above, the City strongly objects to any variance to the minimum room size development standard. The minimum standards provisions in the Affordable Housing SEPP are the bare minimum standards acceptable for human habitation, and therefore the consent authority should not permit any variation to this minimum standard. Taken into consideration with natural cross ventilation, and floor to ceiling heights, the rooms are considered to provide poor amenity.</p> <p>In light of the above, it is recommended that the applicant revise the scheme and increase the size of the single rooms in order to comply. While this will result in the loss of some rooms it is noted that this proposal provides 688 beds and 635 beds have already been approved in Building W2 (SSD 6010). This results in a total number of 1303 beds, which is far in excess of the 1,000 beds envisaged under the Concept Plan Approval (SSD 13_5878).</p>			

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<p><b><i>Bicycle and Motorcycle Parking:</i></b>  The minimum bicycle and motorcycle parking requirements are contained within Clause 30 'standards for boarding houses'. The SEPP requires the provision of one (1) bicycle space and one (1) motorcycle space per five (5) boarding rooms. This would require a total provision of 104 bicycle spaces and 104 motorcycle spaces. This proposal seeks to provide 90 bicycle spaces and nil motorcycle spaces.</p> <p>No objection is raised with regards to the proposed variation to the requirement to provide motorcycle spaces, as it will encourage the residents of this building to use more public transport, walking and cycling.</p> <p>Notwithstanding this, the City objects to the proposal to provide 14 bicycle spaces less than the minimum required by the SEPP. It is noted that, while the Sydney DCP 2012 does not apply, the DCP would require 165 bicycle spaces. While the provision of 165 bicycle spaces would be the preferred outcome, it is our view that 104 spaces should be provided as a minimum in line with the requirements of the SEPP.</p>	<p>It is not considered practical to provide additional bicycle spaces. If additional bicycle spaces were to be provided, the bicycle storage area would encroach on the common area of the ground floor, impacting on the amenity of this space and the ability for the space to be used by residents. Additional bicycle spaces can be provided in the Northern Park, however these would not meet the requirements for visitor parking as they could not be enclosed. These spaces would also encroach on the open space provided within the Northern Park.</p>	<p>No</p>	<p>The City's original comments remain unchanged.</p>

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<p>Bicycle parking for visitors is to provide in an accessible on-grade location near a major public entrance to the development and is to be sign posted. The layout, design and security of bicycle facilities must comply with the minimum requirements of <i>Australian Standard AS 2890.3:2015 Parking Facilities Part 3: Bicycle Parking Facilities</i>. The bicycle parking place should be located close to entry/exit points and subject to security camera surveillance where such security system exists. A safe path of travel from bike parking areas to entry/exit points is to be marked.</p>			
<b>Building Design</b>			
<p><b>Western façade:</b> It is unclear from the proposal how the facade which fronts the heavy rail corridor is proposed to be accessed for cleaning and maintenance. Further clarity is required to confirm that the use of the building maintenance unit on the south elevation will not impact on the operation of the heavy rail corridor.</p>	<p>Refer to DA2103, as amended. The façade of Building W1 has been designed with a relationship to Building W2, with variation provided to the north eastern addressing the open corner site. Similarly to Building W2, all facades are accessed by a Building Maintenance Unit (BMU) located on the roof (BMU added to the Roof Plan for clarity).</p>	Yes	No further comment.

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<p><b><i>V columns:</i></b> The street wall façade concept of the 'V' columns at the lowest two levels is supported as an architectural concept, particularly as it extends from approved Building W2 to provide a consistent façade treatment along Darling Drive, reflecting the consistency of building use between the two buildings. However, along the north eastern corner of W1 an external balcony has been introduced at level 1 which effectively cuts the 'V' columns in half and reduces the strength of the concept. The City would support a smaller deck which does not extend past the internal line of the 'V' columns.</p>	<p>The balcony to Level 1 serves the dining facility and provides an outdoor space for students to use for dining and recreation. This element is designed as a long horizontal element to transition from the tall vertical expression of the building to the ground plane, and purposely intersects with the 'V' columns.</p> <p>This element will be read as a light linear floating platform suspended by the 'V' column truss, rather than smaller discontinuous Juliet balconies. This overall scale of the building and the streetscape is considered to be more appropriate.</p>	No	The City's original comments remain unchanged.
<p><b><i>Materials and Colours:</i></b> The 'Building W1 Materials Board' sheet identifies colours only, and lists a variety of materials without being specific on their purpose and location. The southern and western elevations include earthy masonry colours to respond to the masonry character of Ultimo, but shows 'cladding panel' for all cladding which suggests a powder coated metal sandwich panel rather than actual masonry. As the design</p>	<p>Materials and colours will closely reference those approved for Building W2 as the two buildings will be presented as "twins" with a strong aesthetic link. Some variation has been proposed to the north east corner façade utilising modulation in façade depth, height of openings and horizontal elements to respond to the city. The façade system will be a light</p>	No	The City's original comments remain unchanged.

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<p>concept for this facade relies on references to masonry and to hit and miss brickwork, it is our view that actual masonry (or even off form concrete with oxide colouring) would provide a far superior outcome.</p>	<p>weight curtain wall system similar to that used for Building W2 which was selected due to buildability.</p> <p>The colours and articulation to the south and east facades makes reference to the existing context of brickwork without mimicking the materiality.</p>		
<p>It is also noted that insufficient information is provided on the proposed construction of the 'V' columns to assess the robustness of the material. The consent authority should ensure that the cladding for the 'V' columns is robust, durable and capable of withstanding impacts from its prominent position within the public domain. Materials are to be self-finished.</p>	<p>Construction using brick, precast panels or materials requiring scaffold and hoisting was investigated for Building W2 and determined to be unsuitable due to the proximity of the façades to the adjacent light rail corridor. The light weight curtain wall system proposed is able to be installed from inside the building structure, omitting the need for craning over the boundary and mitigating any safety risk to the light rail corridor. This approach has been adopted with the construction of Building W1.</p>	<p>No</p>	<p>The City's original comments remain unchanged.</p>

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<b>Central Courtyard</b>			
<p><b>Privacy:</b> The central courtyard appears to be designed solely for student use, however is publically accessible. Given the limited activation and overlooking, and the sometimes awkward interface between doors and columns, this space could be better utilised if secured and made private</p>	<p>Privatisation of the central courtyard is not in keeping with the objectives of the wider SICEEP precinct. Permeability of the courtyard is required to allow for waste removal and substation access as prescribed through easements. Design features, such as paving/ground treatments, planter boxes and the bridge link, have been included in the central courtyard to delineate the transition from public to semi-private/semi-public space.</p>	No	<p>Whilst publically accessible open spaces are broadly supported across the SICEEP precinct, the suitability of this approach in this particular location is not supported for the reasons outlined in our original submission.</p> <p>The City's original comments remain unchanged.</p>
<p><b>Activation:</b> The majority of frontage to the central courtyard is services, including garbage and substation. The entrance to building W1, and a possible exit from W2 is the only activation of the space. If the courtyard is secured as recommended above, the applicant should ensure clear and visible access to the space from both buildings.</p>	<p>These essential services are required to be provided in their current location due to access requirements and easements. The proposed use of the central courtyard space ensures that this otherwise neutralised space is optimised for use by the adjacent residents.</p>	No	<p>The City's original comments remain unchanged.</p>
<p><b>Interface between doors &amp; columns:</b> All doors leading to the ground level outdoor spaces appear to be positioned behind columns, further limiting the activation of the spaces, and possibly blocking direct views to</p>	<p>These ingress/egress doors have been amended to allow for suitable clearance.</p>	Yes	<p>No further comment.</p>

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the building entries. The applicant should ensure all building entries are clearly visible, and not blocked by columns.			
<b>Boundary to light rail:</b> The boundary between the central courtyard and light rail should be designed as an element that integrates with the built form, unifying the space. The applicant should consider designing an integrated element connecting the two buildings and forming the boundary to the light rail, removing the need for the chainlink fence.	A fence is required to be provided to this boundary to restrict access to the light rail corridor. The treatment of this fence has been determined in discussion with TfNSW.	No	The City understands that a fence is required and must be determined in discussion with TfNSW, however this requirement does not negate the requirement to achieve improved design outcomes wherever possible.  The City's original comments remain unchanged.
<b>Pedestrian safety</b>			
There is a lack of safe pedestrian connectivity to the north of the site across Darling Drive. In recognition of a pedestrian desire line to the north east of the site (across Darling Drive), consideration should be given to reconfiguring the junction at this point to enable a safe pedestrian crossing.  The applicant should also confirm the access restrictions to the light rail corridor behind the student housing, and whether the junction to the south of W2 is secured in any way.	The site-wide approach to pedestrian movements has been determined under the Concept Proposal by Lend lease in consultation with TfNSW and other relevant stakeholders. A detailed response to this matter is provided in the covering Response to Submissions Report.  A pedestrian crossing over Darling Drive was approved under SSDA3 with Building W2. This pedestrian crossing	No	The City's original comments remain unchanged.

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	<p>was identified as the key east-west desire line through Darling Square and Buildings W1 and W2 have been orientated to reflect this. The central courtyard between the two buildings has been developed to provide a celebrated entry to the buildings and focus pedestrian traffic in a central location which can maximise use of the approved Darling Drive pedestrian crossing. Lend lease, TfNSW and RMS have been in constant dialogue regarding the site-wide Darling Square transport movements for vehicles and pedestrians. These discussions have informed the proposed design which accords with the approved Concept Proposal. As such, it is not considered that an additional pedestrian crossing is required on the northern extent of Darling Drive.</p>		
<b>Waste Collection</b>			
<p>On street garbage collection is proposed, contrary to the City's usual requirement to facilitate on-site collection. It is noted that the garbage storage room is currently located approximately 23m from the likely on-street collection point. The City is not supportive of this aspect of the proposal and encourages the</p>	<p>Urbanest uses private contractors for waste collection at all Urbanest properties. Contractors have access to garbage rooms which allows them access to remove waste on a needs basis, removing the need for large scale kerb side collections. Private</p>	<p>Partial</p>	<p>It is recommended that the Consent Authority impose a condition of consent to ensure garbage and recycling is not placed on the street for collection more than half an hour before the scheduled collection time, and that</p>

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provision of on-site collection. However, it is noted that there is no vehicular access to the site, nor any basement level proposed, therefore on-site collection is impossible under the parameters of the proposed design.	contractors consulted during the design phase have not raised any issues with location of the bin store.		bins and containers are removed from the street within half an hour of collection.  This condition was recommended in the City's original submission.
If on-street collection is to be supported by the consent authority, then the garbage storage area should be located in a way that it does not impede pedestrian access to the street and is within 10m of the street for easy access for staff during collection.	As above, private contractors consulted during the design phase have not raised any issues with location of the bin store.	Yes	No further comment.
It is noted that the space between the building and columns, and also the columns and timber bleachers, may be too narrow for the bins to be wheeled out for collection. The applicant should confirm that adequate space is provided for bin collection.	Garbage collection is to be made by private contractor with bins directly taken from the garbage rooms via the central courtyard to Darling Drive. The sketch provided with the Architectural Drawings at Appendix A shows that the clearances are acceptable to manoeuvre bins to and from the garbage room.	No	The submitted drawing indicates that the space between the southern facade and the V Columns is extremely tight, with virtually no clearance. The City remains concerned as this is impractical and is likely to result in damage to the facade and the principal entry over time.
<b>Security</b>			
A detailed operational and security management plan has been submitted with the		Partial	The consent authority should be satisfied that those matters not

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<p>application. City staff are broadly supportive of the plan, however consideration could be given to the following:</p> <ul style="list-style-type: none"> <li>• Ensure that common entries are accessible by key card/pad or intercom system and should be self-closing and self-locking.</li> <li>• Ensure that individual dwellings incorporate solid core doors, security locks and one-way viewers.</li> <li>• Ensure that communal areas such as garbage storage areas and recreation areas are situated along well used clearly defined routes, are observable from private and semi-private areas and do not provide potential entrapment spots.</li> <li>• Ensure that lighting illuminates pedestrian routes, dwelling entries, internal and external communal areas such as hallways, foyers, lifts and stairwells.</li> <li>• For CCTV installed into the public domain, consideration should be given to the types of cameras proposed, placement, management, monitoring and storage of data as well as a proposed protocol for sharing information. Consideration should be</li> </ul>	<p>Secure access card technology will be implemented into Building W1 to ensure restricted access.</p> <p>Solid core doors and security locks will be implemented into each room.</p> <p>As illustrated in the proposed design, all communal areas such as garbage storage areas and recreation areas are situated along well used clearly defined routes with clear sightlines.</p> <p>All pedestrian routes, entries and internal and external communal areas will be well lit.</p> <p>Suitable CCTV cameras will be installed within and around Building W1 in appropriate locations with footage available in real time both site on site and remotely in Urbanest's Sydney head office.</p>		<p>mentioned in the applicants response, e.g. one way viewers, positioning of communal areas, etc., have been appropriately addressed.</p>

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given to liaising with local police about placement in and around the development and its management.			