

North Eveleigh Affordable Housing

July 2013

Prepared for City West Housing Pty Ltd



Response to Submissions
Reference No. SSD 5708

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Attachments

Attachment A	Amended drawings, for approval
Attachment B	Modification of Concept Plan – Response to Agency Submissions
Attachment C	Modification of Concept Plan – Response to Public Submissions
Attachment D	North Eveleigh Affordable Housing – Response to Agency Submissions
Attachment E	North Eveleigh Affordable Housing – Response to Public Submissions
Attachment F	Traffic Response, <i>prepared by ARUP</i>
Attachment G	Email from UrbanGrowth regarding access
Attachment H	Heritage Response, <i>prepared by GBA</i>

Quality Assurance

Reviewed by



Michael Harrison

Director
Urban Design and Planning
Architectus Sydney Pty Ltd

25 July 2013

Date

This document is for discussion purposes only unless signed.

1 Introduction

1.1 Purpose

This submission is prepared on behalf of City West Housing ('CWH'), the Applicant in the matter.

The purpose of this report is to respond to issues raised in submissions following the public exhibition of the State Significant Development Application and application to modify the existing concept plan approval listed below.

This report:

- Provides a detailed response to all submissions received
- Recommends amendments to the drawings as a result of submissions
- Identifies minor changes to the drawings requested by the Applicant; and
- Assesses the impact of the proposed changes.

Following Architectus' review of submissions, we are confident that we have been able to respond to submissions and address any residual concerns about the development. We recommend that the Department of Planning and Infrastructure approve the revised plans included at **Attachment A** to this report.

1.2 Background

On 14 April 2013, the Applicant lodged the following applications with the Department of Planning and Infrastructure (the 'Department'):

- **State Significant Development Application No. SSD5708** – which seeks approval for the construction of a part 6, part 7 storey residential flat building for affordable housing. The proposal comprises 88 residential units, basement car parking for 39 cars and 88 bicycles, a roof top garden and landscape works; and
- **Modification to Concept Plan Application No. 08_0015 MOD1** – which seeks to amend the 2008 Concept Plan approval by amending the maximum height of building D4 from 6 storeys to 7 storeys, and also extending the building footprint to allow for improved design, environmental performance and amenity outcomes.

Both applications apply to Lot 3 DP 1175706, which is the 10.7 hectare North Eveleigh rail yard site. The proposal is for the development of Lot 3 DP 1175706/ Building D4, which has a site area of approximately 2,500sqm within the North Eveleigh site.

The site is within the City of Sydney Local Government Area (LGA). The site's location within the Concept Plan precinct area is shown in **Figure 1**.

The proposed building is to be used for affordable housing, owned and managed by CWH, a not-for profit group who have developed 547 affordable units in the City of Sydney LGA. The units are to be rented to low to moderate income households who have a connection to the locality at a maximum rate of 30% of their net income.

Please refer to the Environmental Impact Statement in support of the

application on the Department's website for more background information about the site and the proposed development:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5708

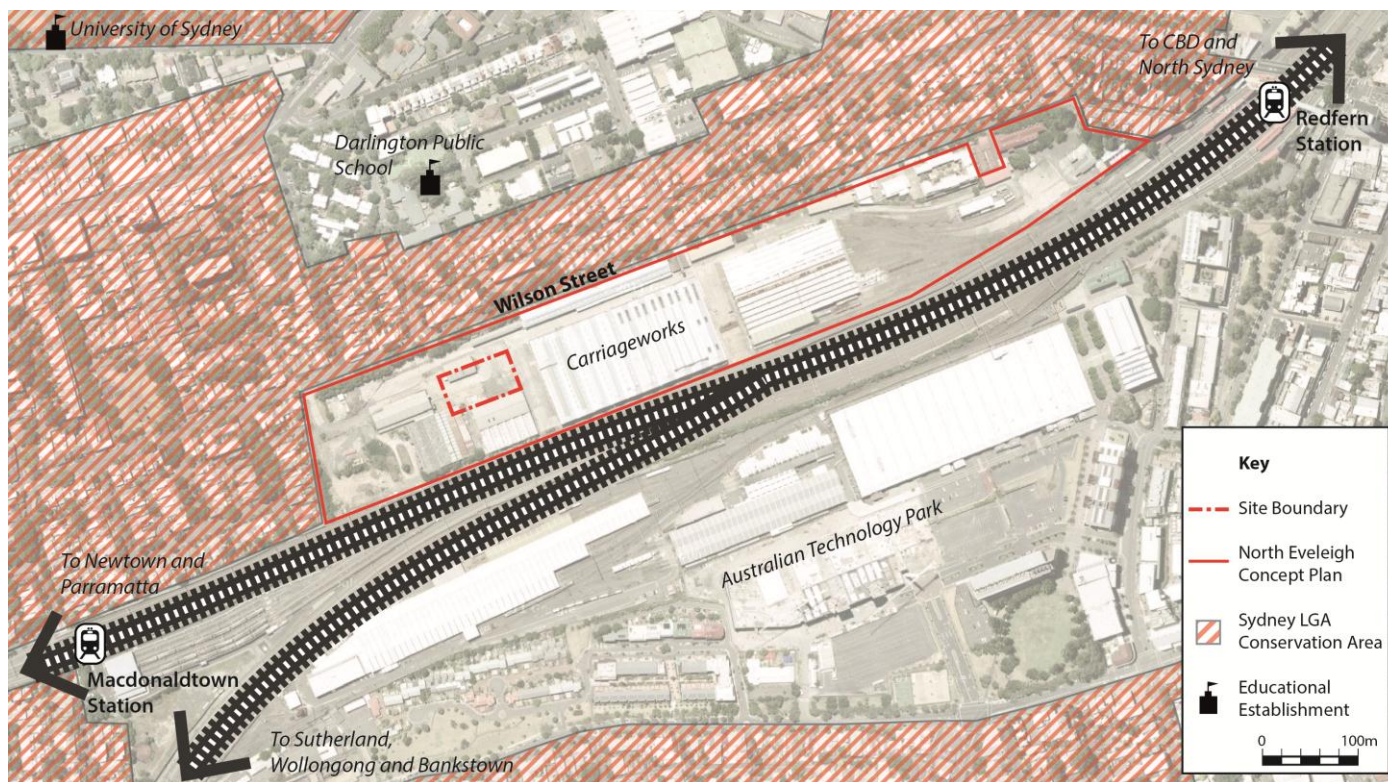


Figure 1 - Location Plan

2 Numerical Summary

Some minor amendments to the plans are proposed, and described in the following sections of this report. A numerical summary of the proposed drawings, compared to the exhibited drawings, is shown below.

Table 1 - Numerical Summary

	2008 Concept Plan Requirement	Exhibited DA			Proposed Post-Exhibition – For Approval		
GFA	6480m ²	5933m ²			6000.3 m ²		
Number Units	n/a	88			88		
Height in Storeys	6 storeys	Part 6-storey, part 7-storey			Part 6-storey, part 7-storey		
Maximum RL	RL 44.1 to roof	RL 47.1 to roof (Parapet – RL48.6)			RL 47.6 to roof (Parapet – RL48.8)		
Car Spaces	MAXIMUM 51 spaces (Sydney LEP 2012)	39 space			38 spaces + 1 basement visitor space		
Bike Spaces	n/a	88			88		
Unit Mix	n/a	Unit type	N0.	%	Unit type	N0.	%
		Studio	10	11%	Studio	10	11%
		1 Bed	37	42%	1 Bed	37	42%
		2 Bed	36	41%	2 Bed	36	41%
		3 Bed	5	6%	3 Bed	5	6%
		TOTAL	88	100%	TOTAL	88	100%

3 Public Exhibition Outcomes

Both applications were exhibited between 1 May 2013 and 31 May 2013 in accordance with the Environmental Assessment Act 1979, and the Director General's Requirements relating to this DA. The public exhibition generated the following submissions:

Table 2 - Submissions following Public Exhibition

Application	Agency Submissions	Public Submissions
Application No. (08_0015 MOD 1) to modify the Concept Plan residential, commercial, cultural and open space	City of Sydney Office of Environment and Heritage - Heritage Branch NSW Railcorp NSW Roads and Maritime Service (RMS) Transport for NSW	1 submission by a member of the public.
State Significant Development Application No. SSD5708	City of Sydney Housing NSW NSW Police Office of Environment and Heritage - Heritage Branch Railcorp NSW Roads and Maritime Service (RMS) Sydney Water Transport for NSW	8 submissions by members of the public, comprising: <ul style="list-style-type: none"> • 1 comment • 6 objections • 1 spam email

3.1 Themes Raised in Submissions

The submissions received were generally in support of the proposed development and encouraging of both the renewal of the precinct and the provision of affordable housing.

Some concerns were raised however, which can generally be categorised as follows:

- Traffic impacts
- Parking impacts
- Building height
- Building materials
- Unit size, unit mix & internal amenity
- Relationship with the heritage-listed Carriage Workshop and other heritage items in the precinct
- Safety and activation

Architectus, with input from the specialist consultant team and CWH, has reviewed the submissions in detail. Our response to each submission and any resulting amendments to the plans are outlined in the following attachments:

- **Attachment B** – Response to **Agency Submissions** on Application No. (08_0015 MOD 1) to modify the Concept Plan residential, commercial, cultural and open space

- **Attachment C** - Response to **Public Submissions** on Application No. (08_0015 MOD 1) to modify the Concept Plan residential, commercial, cultural and open space
- **Attachment D** - Response to **Agency Submissions** on State Significant Development Application No. SSD5708
- **Attachment D** - Response to **Public Submissions** on State Significant Development Application No. SSD5708

A set of amended drawings are included at **Attachment A** to this report.

3.1 Proposed Changes in Response to Submissions

The tables at **Attachment B** to **Attachment D** specifically identify where the plans have changed in response to submissions. The amended drawings at **Attachment A** are marked to show amendments.

In response to submissions, it is proposed to amend the drawings as follows:

- The ground floor has been setback between 1.05m and 1.42m from the eastern boundary in order to provide a footpath along the eastern boundary of the site. This amendment has two benefits:
 - Improved pedestrian circulation, and
 - Allows for garbage to be collected from CarriageWorks Way, should it be required.
- The windows to the 'Type B' apartments have been made larger in order to improve access to natural sunlight. The internal sliding doors to the bedrooms in these apartments have also been made smaller so that they can be positioned to allow more sunlight into the rooms.
- In response to safety concerns, additional screening has been provided to balconies and the rooftop garden. This timber slat screening has the additional benefit of adding more variety to the building facade.
- A visitor parking space has been provided in the basement.
- The design of the north-eastern ground floor corner of the building has been amended and now has a more solid, timber edge and a timber door. This provides this building edge with a more industrial character in response to the adjoining Carriage Workshop building.
- In response to recommendations to increase street activation, additional balconies have been provided to the west facing apartments at levels 1 to 6. The additional balconies provide further articulation of this façade, increase opportunities for activation and passive surveillance of the public domain and improve the amenity for those apartments.
- The shadow diagrams have been amended to show the building envelopes on the adjoining sites, as approved under the 2008 Concept Plan.

3.2 Applicant Requested Changes

During the exhibition period, the team's engineers and designers have been working on the detailed design of the proposed building's services. These investigations have resulted in the need for the following amendments to the building design. It is requested that the Consent Authority approve these changes to the plan, which have been assessed and found to have no additional environmental impacts.

Increased building height

It is proposed to increase the overall height of the building as follows:

Application	Exhibited	Amended, for approval
<i>Roof of 6 storey element</i>	RL 45.2	RL 45.6
<i>Roof of 7 storey element</i>	RL 47.1	RL 47.7
<i>Top of parapet (north-eastern corner)</i>	RL 48.6	RL 48.8
<i>Top of Plant (setback on roof)</i>	RL 49.2	RL 49.8

Note: The Concept Plan generally measures height to the roof, excluding plant. This figure is shown in bold, above

The building's hydraulics and drainage systems need to connect into the precinct-wide stormwater infrastructure, which has already been designed by UrbanGrowth Development Corporation and is under construction.

In order to provide drainage pipes from the roof that connect into the on-site detention tanks at the right level, the building height has to be increased. The tallest part of the building, excluding plant (the top of the parapet on the 7-storey building element) is proposed to be increased by 20cm. The lower, 6-storey element is proposed to increase

The proposed increase in building height ensures that the drain pipes are sufficiently elevated to service the building without mechanical pumps – in line with the passively sustainable design of the building.

It is recommended that the Consent Authority amend both applications to allow for the additional height on the grounds that:

- The shadow studies have been amended to test this additional height, and the impacts are found to be acceptable.
- The proposed building will still not be visible from Wilson Street once the other sites in the precinct are developed in accordance with the approved 2008 Concept Plan (Figure 2).
- The change does not result in any additional floor space or units, or change the appearance of the building.
- The increased height does not perceptibly change the proposed building's relationship with the Carriage Workshop, which has been found to be acceptable by the Applicant's heritage specialist, as outlined in the advice from GBA Pty Ltd at **Attachment H** to this report.

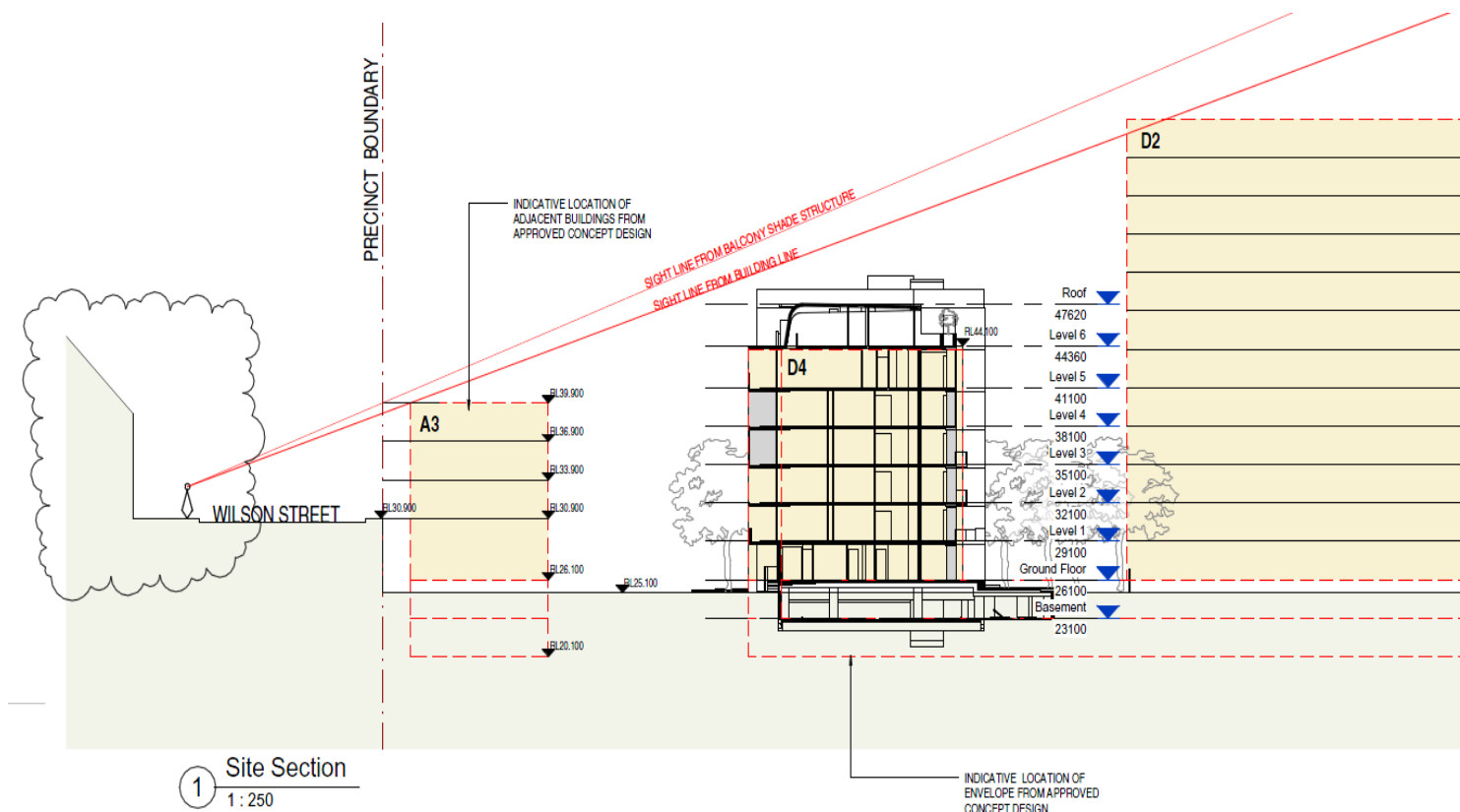


Figure 2 - Excerpt from Drawing No. DA02-005
Included in full at Attachment A of this report.

Rationalisation of Plant and Services

The amended plans also show some changes to the layout and design of the plant and services areas at each level. This is the result of the detailed design of these areas and response to BCA requirements.

Increased Gross Floor Area (GFA)

As a result of the rationalisation of plant areas, an additional 67sqm GFA has been recovered within the same building envelope. This minimal additional GFA has been distributed throughout the building, specifically:

- Increased circulation area and an accessible, public toilet at ground level;
- Increased circulation area next to the western lift core, at every level; and
- Minor increases in size for Apartments Type H and Type N, (western-facing apartments at levels 1 to 6.

Basement

Again, detailed service design has triggered some small changes in the proposed basement. The only real change is the relocation of car park no. 35, which allows for gated, security access to the bike parking area (achieving 'Class 1' bike parking as classified by BCA), as required by the City of Sydney Council.

Windows in southern façade

It is proposed to amend the location of the windows in the southern façade at the western end of the building. The layout of these apartments has not changed, neither has the size of the windows. The intention is to improve the appearance of this façade, which may be viewed by future residents on the sites to the south. Refer to **Figure 3**, below.

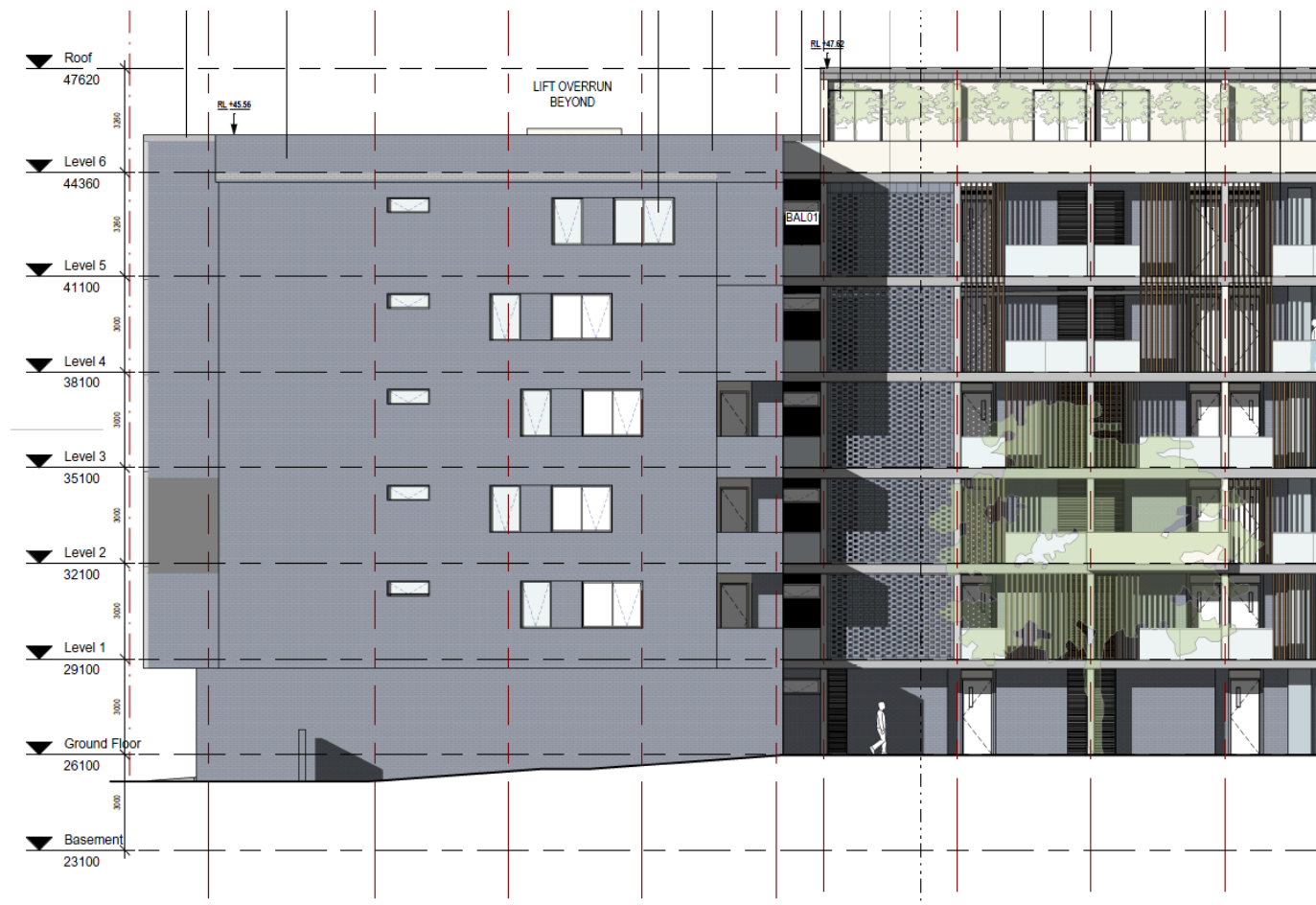


Figure 3 - Excerpt from Drawing No. DA02-002- Southern Elevation
Included in full at Attachment A of this report.

4 Comments on Draft Conditions of Consent

The City of Sydney Council's submission includes draft conditions of consent for consideration by the Department of Planning and Infrastructure.

Generally the content of the conditions is supported by Architectus and the Applicant, with the following exceptions, primarily relating to timing.

4.1 Timing for Conditions relating to Issue of Construction Certificate

Generally, CWH have a very tight schedule for the construction of this development, as specified in their contract with UGDC and with the conditions of the Commonwealth Government's HAF Agreement which relates to funding for this development.

To meet these terms, CWH are required to secure occupation by December 2014 which relies on the commencement of early works in September 2013.

To achieve this timeframe, CWH propose to stage the construction of this development to allow early works and construction of the basement to commence ahead of the rest of the development. So this phase can start quickly (should approval be granted), it is requested that the number of conditions required to be satisfied at this early stage be minimised.

However, it is not appropriate that all conditions are deferred to satisfaction prior to the issue of Occupation Certificate.

The recommended solution is to delay the satisfaction of some conditions, where appropriate, to occur "**prior to the issue of a Construction Certificate relating floor area at ground level or above**".

Having considered the conditions in detail and assessed the implications of delaying certain requirements set out in the City's draft conditions, it is recommended that the relevant conditions be staged as follows:

Condition	Timing, as per the City of Sydney Council's submission	Recommended timing
(1) FOOTPATH DAMAGE BANK GUARANTEE	Construction Certificate	Agree - Prior to issue of Construction Certificate
(2) ALIGNMENT LEVELS	Construction Certificate	Recommended change - prior to the issue of a Construction Certificate relating floor area at ground level or above
(3) PUBLIC DOMAIN PLAN	Construction Certificate	Recommended change - prior to the issue of a Construction Certificate relating floor area at ground level or above
(4) PUBLIC DOMAIN WORKS - HOLD POINTS AND HANDOVER	Construction Certificate	Agree - Prior to issue of Construction Certificate
(5) STORMWATER AND DRAINAGE - MAJOR DEVELOPMENT	Construction Certificate	Agree - Prior to issue of Construction Certificate
(6) LANDSCAPING OF THE SITE – (a) Landscape Plan	Construction Certificate	Recommended change - prior to the issue of a Construction Certificate relating floor area at ground level or above
(6) LANDSCAPING OF THE SITE – (b) Maintenance Plan	Construction Certificate	Recommended change - prior to the issue of a Construction Certificate relating floor area at ground level or above
(6) LANDSCAPING OF THE SITE – (c) Landscaping works	Occupation Certificate	Agree - Prior to issue of Occupation Certificate

Condition	Timing, as per the City of Sydney Council's submission	Recommended timing
(15) DEMOLITION, EXCAVATION AND CONSTRUCTION NOISE MANAGEMENT PLAN	Construction Certificate	Agree - Prior to issue of Construction Certificate
(17) WASTE AND RECYCLING MANAGEMENT – RESIDENTIAL – Parts (a) and (b)	Construction Certificate	Recommended change - prior to the issue of a Construction Certificate relating floor area at ground level or above
(17) WASTE AND RECYCLING MANAGEMENT – RESIDENTIAL – Part (c) - Completion	Occupation Certificate	Agree - Prior to issue of Occupation Certificate
(20) ACCESSIBLE PARKING SPACE	Construction Certificate (Private Certifier)	Agree - Prior to issue of Construction Certificate
(22) CAR PARKING SPACES AND DIMENSIONS	Construction Certificate (Private Certifier)	Agree - Prior to issue of Construction Certificate
(23) INTERCOM FOR VISITORS	Occupation Certificate (Private Certifier)	Agree - Prior to issue of Occupation Certificate
(27) SIGNAGE TO INDICATE NON PARTICIPATION IN RESIDENT PARKING PERMIT SCHEME	Occupation Certificate	Agree - Prior to issue of Occupation Certificate
(29) VEHICLE FOOTWAY CROSSING	Occupation Certificate	Agree - Prior to issue of Occupation Certificate
(30) CONSTRUCTION TRAFFIC MANAGEMENT PLAN	Construction Certificate	Agree - Prior to issue of Construction Certificate

4.2 Condition No. 18 – Allocation for Visitor Parking

No amendment required.

In response to proposed Condition No. 18, a visitor car parking space has been provided in the basement.

4.3 Condition No. 26 – Security Gates

It is requested that Condition No. 26, which requires the security gates to be setback further from the street, be deleted.

It is understood that this condition has been proposed to ensure that vehicles can sit wholly within the site while the security gates open.

To set back the security gates would have an undesirable impact on the design of the building on this highly-visible corner. The proposed design allows for vehicles to be off the road while the gates open, and has been found to be appropriate by the team's traffic engineer.

5 Conclusion and Recommendation

In conclusion, the submissions received in regard to the proposed development have generally been supportive.

Affordable Housing

Most submissions support the development of affordable housing in this location. The 88 units proposed will make a contribution to the affordable housing targets for the North Eveleigh precinct, and towards the City of Sydney's targets established by *Sustainable Sydney 2030*.

Traffic and Parking

The City of Sydney Council support the proposed car parking provision, and the RMS have found that the proposed development will not have significant traffic impacts on the locality.

Heritage Impacts

Graham Brooks and Associates, the team's heritage specialists, have reviewed the relevant submissions and provided an updated review of the proposal, which is included at **Attachment H** to this report. The advice concludes that:

There will be no further heritage impacts resulting from the proposed design for Building D4. The aesthetic, technical and social significance of the adjacent former railway buildings, the Carriage Workshop, Blacksmiths' Shop and Clothing Store, will not be compromised by the proposed development.

Graham Brooks and Associates consider that the minor amendments made to the design, in response to the submissions received, have adequately addressed the heritage considerations. As such the application is recommended for approval.

The proposed building design and materials find a balance between the competing views in submissions from the Council's heritage officers and the NSW Office of Environment and Heritage. The robust brick work and timber finishes draw on the precinct's industrial character, whilst the distinct colour of the proposed brick ensures that the development does not mimic existing buildings and contributes to the future character of this area as a desirable residential precinct.

Increased Building Height

In terms of the application to increase the height permissible under the Concept Plan approval, Graham Brooks and Associates find that the increase of one storey for part of the building is also acceptable from a heritage perspective:

The variation proposed to the height of Building D4, to achieve closer conformity with the allowable floor space, retains the conceptual building hierarchy and is consistent with the continuity of scale envisaged in the approved Concept Plan.

The variation proposed in the design for the affordable housing building will not impact on views to and from this building, and its intrinsic bulk and scale will ensure it remains the dominant built

element in the former rail precinct.

Given their different periods, functions and architectural design, it is preferable if the new building does not closely match the height of the CarriageWorks.

From a planning and design perspective, the additional building height allows CWH to achieve most of the GFA permissible under the 2008 Concept Plan approval for this site. The result of the amendments will be a building that better aligns with adjacent, heritage-listed buildings, performs well-environmentally, creates good internal amenity, achieves high quality design, creates 88 new affordable housing units and makes a positive contribution to the significant North Eveleigh site.

Recommendation

In summary, the proposed development is generally consistent with the applicable legislation, planning instruments, controls and guidelines.

It is recommended that this State Significant Development application be approved subject to the Mitigation Measures because of the project's importance to provision of affordable housing within Central Sydney, and on the grounds that that there are minimal environmental impacts on the locality.