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Dear Mark

**RE: Response to submissions for State Significant Development Proposal (SSD 6092) for Block 8 and Section 75W Application for Project Application MP06\_0171 (MOD 9) for Concept Plan at Central Park, Chippendale (former Carlton United Brewery site)**

The advice in this letter is provided in response to correspondence received from the Department on 15 July 2014. The City was invited to comment on the information submitted by the proponent as part of the response to submissions relating to SSD 6092 and S75W application to modify MP06\_0171. The City notes that the applications have been amended.

Concept Plan Mod 9 comprises:

- Redistribution of GFA across Blocks 1, 4N, 4S, 8 and 11 within the development site providing additional floor space for Blocks 4N (930m<sup>2</sup>) and 8 (3,379m<sup>2</sup>).

SSD Block 8 comprises:

- Construction of a 13 storey mixed use building with 2 ground level retail tenancies, 178 residential apartments, 3 levels of basement car parking for 103 car spaces, 9 motor bike spaces and 203 bicycle spaces;
- Ground level and roof top communal recreational space for residents; and
- Block 8 GFA of 14,879m<sup>2</sup>.

The City notes that the proponent has acknowledged the issues raised in the City's submission dated 28 March 2014. Subsequently, some modifications have been made to the proposal to address the City's concerns relating to apartment layouts and residential amenity. The proponent has also submitted further information to justify built form and design solutions where no amendments are proposed.

Having regard to the amended proposal and additional information submitted, the City provides further comments as outlined on the following pages for each application.

## **SSD application issues**

### ***GFA calculations***

GFA calculations for the whole of the development site have been provided. The proponent has confirmed that a GFA of 14,879m<sup>2</sup> is being sought for Block 8. It is noted that some of the proposed loggias have been included as GFA in accordance with the definition for GFA as the loggias are capable of being enclosed. Overall GFA compliance with the concept plan across the development site is noted.

### ***Excessive apartment depths***

The City maintains its concern regarding the excessive depths of single aspect apartments. The modification to the depth of single aspect apartments to an average of 10m and south facing single aspect apartments from an average of 14.5m to 14m does not resolve the internal amenity and design issues raised in the City's previous submission.

The City maintains that the proposed layout of the single aspect apartments does not provide optimal residential amenity. The provision of additional storage areas within these apartments is a positive. However, dependence on borrowed amenity for bedrooms in apartments to justify the excessive apartment depths should not be accepted by the Department.

The City strongly objects to the justification provided by the proponent that single aspect apartments ranging between 10m to 14m should be accepted and that SEPP 65 compliance is unviable. This issue was predicted by the City when the Proponent decided to change the land use from commercial to residential within the commercial block shape. The City advised the Planning Assessment Commission that either the envelopes would need to significantly change or residential amenity standards would not be complied with.

The efficiency of a residential building will never be as high as for a commercial building and the building depths for good commercial and good residential are not interchangeable. Due to the amount of uncounted GFA in residential and setback and amenity controls the GFA for a residential building in this location will be lower than if it had retained a greater yield of commercial floor space as per the original approval. The original concept plan approval allocated mixed use for Block 8 comprising 14% non-residential floor space and 86% residential floor space. The City notes that subsequent modification applications have been approved gradually reducing the allocation of non-residential GFA for Block 8. The subject proposal comprising 1% of GFA for non-residential use and 99% of GFA for residential use whilst maintaining a large building floor plate contributes to the non-compliances identified above.

Given the proponents claim that the building had little market value as commercial, they should be required to reduce the yield within the envelopes, in seeking the greater residential return.

There is flexibility to amend the proposal to provide appropriate residential amenity whilst being generally consistent and compliant with the building envelope controls approved in the Concept Plan.

### ***Natural light and ventilation to common corridors and lobbies***

The amended proposal provides awning type windows on northern and southern ends of common area corridors to increase natural ventilation. The City acknowledges the environmental benefits of naturally ventilated common areas and supports the proposed amendment.

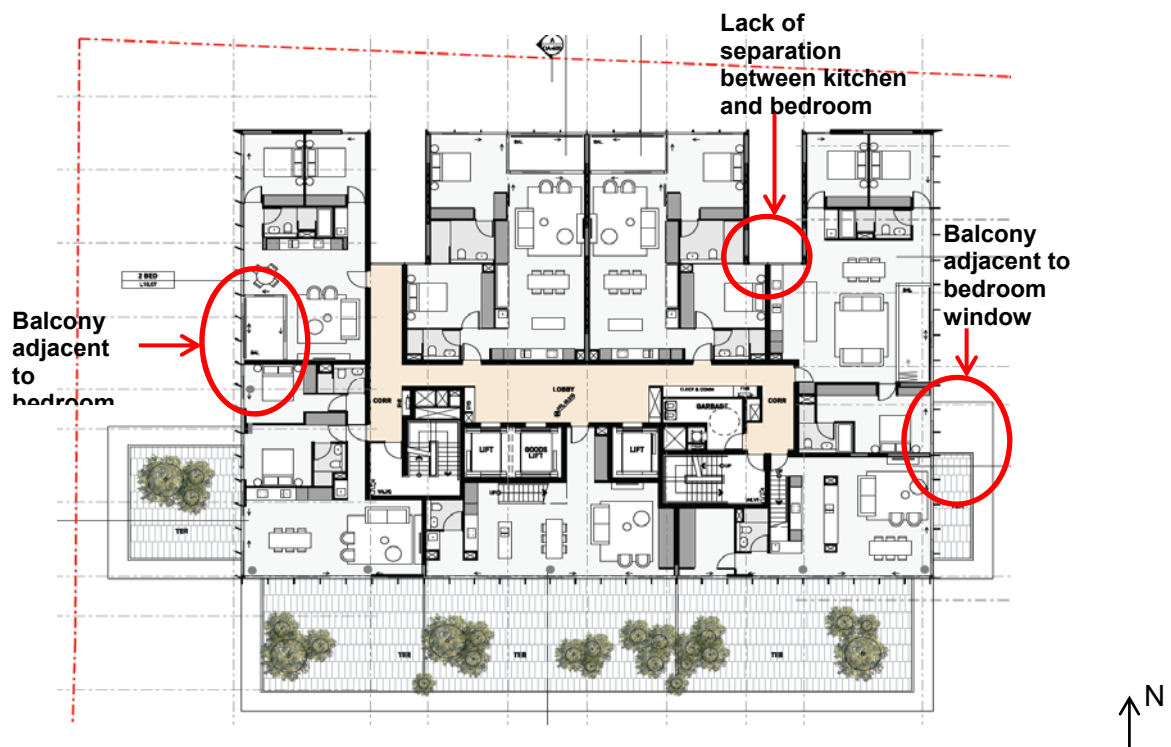
### ***Residential amenity***

The City acknowledges that the proponent has amended the internal layout of some of the apartments on Levels 8-11 in an attempt to minimise noise transfer between adjacent apartments and to improve natural light and ventilation to common corridors. The City acknowledges the amendments made to the apartments on the north-western portion of the building. However, it appears that the proponent has not addressed similar layout and design issues with the remainder of the apartments within the building.

For example, the diagram below shows the location and proximity of window openings and private open spaces of adjacent apartments. The highlighted areas are likely to result in poor visual and acoustic privacy for future occupants. As per the City's previous comments it is not appropriate to have openings to principle living areas or private open spaces of one apartment immediately adjacent to quiet habitable spaces of another apartment.

In this instance, the proposed blades on the eastern and western facades are unlikely to provide sufficient acoustic or visual privacy to bedrooms particularly if windows are opened for natural ventilation.

The proponent should be required to review all apartment layouts within the development to ensure that the design adequately reduces loss of privacy and amenity for future occupants.



**Figure 1:** Level 10 of PPR showing amenity conflicts between apartments.

### ***Interface between public and private domains***

Landscaping and fencing between ground floor units and the adjacent public domain has adopted the recommendations made by the City in its previous submission and is supported.

### ***Car and bicycle parking***

The amended proposal seeks to increase resident car parking spaces from 88 to 103 spaces, and reduce bicycle parking from 251 spaces to 203 spaces. The City does not support this change and that the current balance which provides less car parking spaces and more bicycle spaces, is more desirable from a sustainability and environmental perspective.

### ***Communal open space***

The City maintains that Block 8 does not provide sufficient communal open space to cater for the passive recreational needs of future residents. The residents-only gym and lounge area on the ground floor do not satisfy the requirements of SEPP 65.

The provision of additional communal landscaped open space within the site will improve the amenity for residents. Importantly, it will also be in the public interest as the development will not rely solely on access to Chippendale Green to meet the immediate demands for passive recreation. In this regard, the City recommends that the Department require the proponent to amend the proposal to incorporate additional communal open space on the roof level by reconfiguring the layout of plant rooms, landscaping and reducing the private open space allocated to the two apartments on Level 12.

### ***CPTED***

The City acknowledges and commends the proponent for collaborating with the Redfern LAC resulting in subsequent amendments to the CPTED Report. The City recommends that the Department impose a condition requiring the incorporation of the recommendations provided in the CPTED Report into the design and operation of the building.

### **Concept Plan application issues**

#### ***GFA reallocation***

The City acknowledges an updated GFA allocation table and drawings has been provided by the proponent. The differentiation between approved and proposed GFA includes the breakdown of residential and non-residential floor space as requested. The overall GFA for the development site does not exceed the maximum 255,500m<sup>2</sup> approved as part of the modification application (Mod 8) granted by PAC on 23 December 2013. The City is satisfied that the proponent has provided sufficient information addressing the City's previous comments.

Should you wish to speak with a Council officer about the above, please contact Peggy Wong, Specialist Planner, on 9265 9685 or [pwong@cityofsydney.nsw.gov.au](mailto:pwong@cityofsydney.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

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