

FRASERS BROADWAY CONCEPT PLAN MODIFICATION RESPONSE TO SUBMISSIONS



KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
General	<ul style="list-style-type: none"> Once approved and on completion in a couple of years, we are of the opinion that Frasers Broadway will set the new benchmark for Australia for mixed use developments in an environment where the local community, office tenant, retail and residential occupiers all have contributed to the development of Sydney CBD, the environment and the community at large. 	<ul style="list-style-type: none"> One of the key objectives of Frasers is to create a sustainable precinct which will set an example for future development within Sydney. Frasers are therefore investing a lot of time in researching the best way to achieve this goal.
	<ul style="list-style-type: none"> Given that Broadway is the gateway to the City of Sydney when approaching from the west, what better way to showcase our modern city than with a world class development as proposed. 	<ul style="list-style-type: none"> This is another objective of Frasers. The commissioning of internationally and locally renowned architects demonstrates Frasers commitment to good architectural design.
	<ul style="list-style-type: none"> I believe that the concept plan modification proposed by Frasers Greencliff Developments is a significant improvement on the previously approved Masterplan and would result in many benefits for local Broadway and Chippendale residents, and the general public. It will encourage further investment in this area of Sydney, and lead to more positive social, environmental and employment opportunities for all. 	<ul style="list-style-type: none"> We agree. The proposed modifications will provide a higher level of amenity through the provision of increased public domain and a better distribution of mixes on the site. The improved environmental initiatives will also make the site a desirable place to live, work and visit.
	<ul style="list-style-type: none"> I congratulate Frasers for its community consultation and personally feel this development will become a major community asset for Chippendale in the long term in a similar way Darling Harbour has helped re-develop suburbs such as Pyrmont and Ultimo. 	<ul style="list-style-type: none"> Noted.

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	<ul style="list-style-type: none"> It is evident that Frasers have made an exhaustive effort through intelligent planning and rigorous consultation with Council, the community and other stakeholders and have come up with a modified concept plan that delivers improved environmental, social and cultural outcomes for the local area and the rest of Sydney. 	<ul style="list-style-type: none"> Many of the changes proposed have resulted from Frasers commitment to improve on key concerns that were raised in regards to the approved concept plan.
	<ul style="list-style-type: none"> I support this development because it will bring a much needed revitalisation of Chippendale and its surrounds. 	<ul style="list-style-type: none"> We agree, the proposal will provide a substantial amount of new public open space and will reactivate what is currently an inaccessible site within the Chippendale area.
	<ul style="list-style-type: none"> The development will provide new entertainment complexes, retail and commercial locations and businesses catering for a diversity of lifestyles and ages, accommodating social needs of the community and creating extra opportunities of employment for the local community. 	<ul style="list-style-type: none"> We agree, the proposed development is expected to provide 6,100 new jobs.
Density	<ul style="list-style-type: none"> The site represents a huge opportunity to demonstrate sustainable urban development. The close proximity to Central Station and Railway Square buses makes this an appropriate site for high density commercial and residential development. Further, the precinct scale makes sustainability initiatives that might not be considered at individual building development sites commercially viable. 	<ul style="list-style-type: none"> We agree, the site is one of the most suitable in Sydney for high residential and commercial densities.
	<ul style="list-style-type: none"> I live in an apartment in the inner city and I believe we should support further development within walking distance of the CBD as a sensible and environmentally sustainable approach to Sydney's growth. 	<ul style="list-style-type: none"> We agree, the proposed development is in close proximity to existing public transport and social infrastructure and is in accordance with the key concepts of the Sydney Metropolitan Strategy.
	<ul style="list-style-type: none"> It is very clear that as the population in Sydney increases we will need to develop the inner city to be a more pleasant and efficient place for people to work and live. The urban sprawl that continued to the foot of the Blue Mountains has resulted in a large strain on infrastructure and on the resources of local government. To this end, we need to accommodate more people in closer proximity to the large business areas, especially the Sydney CBD, so as to minimise commuting time and energy consumption. I like the fact that such a large development will be situated adjacent to the largest train station in Sydney. 	

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	<ul style="list-style-type: none"> ▪ I also think that the proposed Frasers development achieves something that the environmental groups have been lobbying for the past decade in Australia: <ul style="list-style-type: none"> - concentrate the residential and commercial developments in the same area - increase residential density in the city ▪ this in return reduces the pressure on the urban sprawl and subsequently reduces the pressure on the government to extend public transports and infrastructure to areas which are not financially viable. 	<ul style="list-style-type: none"> ▪ The proposed densities and position of the Frasers Broadway site will also provide a substantial amount of new housing and employment as targeted in the subregional strategy for the City of Sydney.
Density	<ul style="list-style-type: none"> ▪ The increased density from 235,000 to 257,000 GFA will result in too many people into too small an area. 	<ul style="list-style-type: none"> ▪ The Frasers Broadway site is a perfect example of a site which is suitable to higher densities given: <ul style="list-style-type: none"> - its close location to Central Station bus and train transport interchange; - its location on Broadway, which is a major arterial road that is well served by public buses; - the existing high density of development in Chippendale and east of Abercrombie Street; - its current city edge zone which suggests a strong association with the CBD; and - the limited availability of development sites within the existing Sydney CBD for commercial offices. ▪ This is a less than 10% increase in the overall GFA and is achieved while decreasing the proposed permanent residential population by shifting the dwelling mix to 50% commercial. This is in keeping with the Sydney City draft sub-regional strategy to ensure capacity for new office and hotel developments in the city centre and city fringe areas.

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Density	<ul style="list-style-type: none"> We believe that the most recent proposal for the CUB site is excessive and needs to be reduced to the original figures that the City of Sydney were proposing after the original competition. 	<ul style="list-style-type: none"> The DoP has previously considered the recommendations of the Expert Advisory Panel and the City of Sydney and has recognised that the site is capable of accommodating a higher density than that of the original competition. This is reflected by way of the existing approval granted by the DoP. With its public transport and urban accessibility this site can accommodate substantial density and is consistent with the Sydney Metropolitan Strategy and City of Sydney 2030 vision.
	<ul style="list-style-type: none"> None of the 'benefit of modification' statements provided in justification for the GFA increases is a substantial benefit that could not be achieved through a redistribution of the floor area rather than an increase. 	<ul style="list-style-type: none"> Additional GFA is achieved without impacting on public amenity. In contrast the small increase in GFA has been achieved with additional public open space and solar access, and will fund world class architectural design and sustainability initiatives This site can accommodate the increased density which has been directed towards the Abercrombie, Broadway edge and away from residential areas
	<ul style="list-style-type: none"> As this suburb has a high student population it is highly likely that small rented apartments will be further filled with additional people, resulting in unexpected gross overpopulation in the vicinity. 	<ul style="list-style-type: none"> There is no evidence submitted to substantiate this claim. The population density figures submitted with the application are based on the 2006 census data and it is noted that the residential density of the site, as proposed in the modified concept plan (2,200 residents), will actually be reduced compared to that of the approved concept plan (2,800 residents). Frasers will ensure that building management regulations do not allow for over-crowding of units Dwelling mix will be designed to cater for a diversity of households including provision for the increased desire of young families to live in the inner city.
Built form	<ul style="list-style-type: none"> We support the integration of Broadway and Chippendale through a gradual transition across the site – low rise to high rise. 	<ul style="list-style-type: none"> Noted.

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	<ul style="list-style-type: none"> Given that Broadway is already a busy thoroughfare, high rise development will not affect the feel of the surrounding neighbourhood. It makes sense to have the highrise development adjacent to Broadway with less impacting development to the south of the site. 	<ul style="list-style-type: none"> We agree. Positioning the highrise development along the Broadway frontage will also have the benefit of reducing noise and fume impacts on the main park and the residential buildings located within the site.
	<ul style="list-style-type: none"> The information provided about Block 6 is insufficient for me to understand what is proposed. However, it seems the block is proposed to reach a height of approximately four to five stories in a street of heritage listed buildings. I believe it is inappropriate to develop such a high structure between two terrace buildings because it defeats the purpose of heritage listing and preservation of the adjoining terraces. Further this building will go directly to the boundary of the apartment block I live in (33 Goold Street) and will take light away on the lower floors which may have to be bricked up. 	<ul style="list-style-type: none"> It is noted that the proposal seeks consent for the building envelopes on Block 6. The final design will be modulated and will respond appropriately to the existing surrounding buildings. The building envelopes have been reviewed by HBO + EMTB who consider that the design will provide for a suitable transition between the existing hotel and the terraces further down the street. Additional information on the proposed building envelope is given at Appendix A. 33 Goold Street does not adjoin Block 6. No lightwells will be affected by the proposed development.
Height	<ul style="list-style-type: none"> I don't agree with the scale of buildings towards the back/south of the site, as I think they are incongruous with the rest of Chippendale which has managed to maintain a moderate level of density and green space without so much height. 	<ul style="list-style-type: none"> The building mass at the rear of the site has been modified so that the buildings have a greater separation distance from the existing development in Wellington Street and O'Connor Street than that of the approved Concept Plan. As such it is considered that the proposal will in fact provide a better interface between the proposed development and that existing in Wellington Street, particularly as an enlarged park will now be provided in this part of the site.
	<ul style="list-style-type: none"> The increase in height makes a mockery of the Chippendale conservation plan and will dwarf the buildings on the southern side of Wellington Street by a factor varying between 2.8 times to over 3.4 times. 	
	<ul style="list-style-type: none"> Concerns about the lack of information about building heights that are being proposed in the amended plans, i.e. the information on exhibition is provided in terms of AHD. 	

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	<ul style="list-style-type: none"> The proposed development along Abercrombie Street, with its excessive high rise and overshadowing will destroy Chippendale as one of our last inner city villages. 	<ul style="list-style-type: none"> It is noted that the modified concept plan is seeking consent for general building envelopes only and that the final design of the building (to be provided in future project applications) will be modulated and articulated. The proposed building on Blocks 1 and 4 has been designed by Foster and Partners, a renowned international architectural firm who have won many prestigious architectural awards. Fosters are currently meeting regularly with the Design Integrity Panel as part of the design excellence process. It is therefore expected that the final design of the building will be of a high level of architectural quality and will positively contribute to the surrounding area.
Height	<ul style="list-style-type: none"> I feel the North east corner development of Buildings 1 and 4a dominate the church structure on the opposite corner and could well step back from the Australia Hotel. 	<ul style="list-style-type: none"> The proposal is considered to provide a better urban design response to that of the approved concept plan which left the Australian Hotel isolated and surrounded by taller buildings. Under the modified concept plan, the datum line established along Broadway and Abercrombie Street will ensure that the surrounding buildings will have a strong relationship with the hotel and the building element over the top of the hotel will provide a stronger element for the prominent corner of Abercrombie Street and Broadway. Indicative designs for buildings on Block 1 and 4 have been designed by Fosters + Partners so that at street level there is no intrusion on the heritage or visual amenity of the Australian Hotel.
	<ul style="list-style-type: none"> Whilst walls do fortify against noise and fumes from the through streets, this benefit does not require buildings tall enough to shade the far side of the street. A part solution would be buildings stepped back from the street. 	<ul style="list-style-type: none"> As noted above, the application seeks consent for the building envelopes only and that the final design will provide a modulated building which will involve a series of setbacks from Abercrombie Street.

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	<ul style="list-style-type: none"> The height and scale of the development is overwhelming and will result in totally unacceptable degree of overshadowing of public space and local streets. 	<ul style="list-style-type: none"> As demonstrated in the shadow diagrams submitted with the application, the proposal will provide a higher level of solar access to the main park during the critical times of the year. It is also noted that the additional public domain proposed as part of this application will also have a significant level of solar access.
	<ul style="list-style-type: none"> I object to buildings along Broadway being up to 120 metres (UTS is 114m) with buildings along Abercrombie over 15 storeys high. 	<ul style="list-style-type: none"> The building on Block 2 is the same height as that of the UTS tower (RL 133). The building height is limited by the Obstacle Limitation Surface stipulated by Sydney Airport. The buildings along Abercrombie Street will have a height of approximately 60 metres and will accommodate approximately 12 to 13 storeys of commercial floor space. They will not be over 15 storeys high. These buildings are being designed by world renowned architects Fosters + Partners to deliberately create a striking, visually arresting western gateway to the Sydney CBD. This is in keeping with the identification of this site in the Sydney City Draft Subregional Strategy as the entrance to the CBD commercial hub and part of an important education/business/health corridor.
	<ul style="list-style-type: none"> I object to the increase in height along some key street frontages. The end result will be intimidating street walls, with little or not relevance to onsite and offsite heritage buildings. Overhangs along street frontages have no relevance to the character of the area. 	<ul style="list-style-type: none"> The final design of the buildings will be modulated and articulated to ensure that they contribute to the streetscape rather than detract Indicative designs for buildings on Block 1 and 4 have been specifically directed to create a striking but appropriate commercial statement and to achieve a street level visual amenity which does not interfere with heritage aspects of the site the bottom three stories have been designed to evoke a sense of human scale that is consistent with that of the surrounding area.

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Architectural Merit	<ul style="list-style-type: none"> In terms of appearance, I understand that the same architects who designed 'Lumiere', opposite Sydney Town Hall, will be employed on this development. I have seen 'Lumiere' and I believe that its appearance is very pleasing to the eye and greatly enhances the Town Hall area, without detracting from the heritage feel of Town Hall itself. 	<ul style="list-style-type: none"> Architectural appearance is an important aspect of this proposal. The design excellence process proposed by Frasers will help ensure that the final designs of the building are of high architectural merit.
	<ul style="list-style-type: none"> Initially I was a bit worried about another potentially ugly UTS style tower in the area, or even worse, a Meriton style Waterloo eyesore, which in my opinion are set to be the new "projects" in Sydney in about 10 years. But since attending the meeting and seeing the models, I'm very impressed. 	
	<ul style="list-style-type: none"> I am not convinced that the development will be an attractive quality development. 	<ul style="list-style-type: none"> Details of the proposed design excellence process were provided in Section 4.13 of the EAR. It is noted that Frasers have appointed both international and local architects to prepare the detailed designs of the buildings on the site. These architects have met on a regular basis with the Design Integrity Panel appointed by the Department of Planning so that the design of the buildings evolves. With these measures in place we believe that the community can take comfort that the final precinct design will be attractive and of a high quality.
Environmental Sustainability	<ul style="list-style-type: none"> We support world class sustainability targets for development and operation of the site, including zero net carbon and zero net potable water targets. 	<ul style="list-style-type: none"> Many of the proposed changes have arisen from Frasers strong commitment to providing a sustainable development.
	<ul style="list-style-type: none"> ... More important than this is Frasers commitment to sustainability. Too many development are allowed throughout Sydney that have no concept of sustainability. Frasers has addressed all issues from water conservation, to easing traffic congestion to architectural design to reduce resource use as a crime. These are initiatives that should be encouraged in all developments. 	

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	<ul style="list-style-type: none"> I would like to specifically praise the tri-generation initiative as an alternative to coal fires power generation that may strongly influence other sites of urban renewal throughout NSW. It is because of this and the combination of other leading edge sustainability initiatives that I would highly recommend the approval of this plan. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> The community will benefit from the 6 Green Star precinct that Frasers Property is aspiring to achieve. This may have positive benefits for the Chippendale community from an environmental perspective and a possible increase in value. There is also potential to derive benefits from the green initiatives that Frasers are intend undertaking on the site – possible water and power spin-offs. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> Frasers Property has set the aspiration to target a 6 Green Star precinct, the first precinct to target such a rating. Once achieved, this would be the highest rating achieved for a precinct and certainly challenge all other major developers to target this rating. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> I think the developers should be acknowledged for the steps that they have taken to have as little impact as possible on the environment. These include the massive recycling program that is going on with the transformation of the site as well as the steps taken to ensure on-going environmental sustainability and design initiatives to reduce the 'carbon footprint' left by the development. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> It is refreshing to see a large scale development in our area that builds on Michael Mobbs (another local resident and renovator of the "Sustainable House") that was featured at the powerhouse museum for its goal of having a carbon neutral footprint. 	<ul style="list-style-type: none"> Noted.

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	<ul style="list-style-type: none"> Whilst I support some of the environmental and design initiatives being put forward, these should not justify the increased height and density that is now being proposed. 	<ul style="list-style-type: none"> World class architectural design and sustainability initiatives are fundamental to the Fraser's Broadway project. Additional height and design has been specifically directed to minimise impacts on residential areas and to create an iconic western gateway to the CBD
Overshadowing	<ul style="list-style-type: none"> The height and scale of the development will generate unacceptable overshadowing to the public open space and the surrounding suburb. 	<ul style="list-style-type: none"> Between 12 and 2pm at all times of the year, the modified proposal will provide more sunlight to the main park than the approved concept plan. In addition to the park, the proposal also provides additional public domain areas which will also receive a high level of sunlight throughout the year. The shadow diagrams prepared by Foster and Partners and JM Modelling demonstrate that the proposal will have a similar impact on surrounding development compared to that of the approved concept plan.
Overshadowing	<ul style="list-style-type: none"> We have noted that there appears to be a discrepancy in the shadow diagrams prepared by JM Computer Modelling and those in the document entitled Comparison Sunlight Hours. 	<ul style="list-style-type: none"> Both shadow studies are correct however they appear different as they show different information. The drawings prepared by JM modelling only show the shadows on the ground plane as if there are no buildings surrounding the site. A letter explaining the methodology that JM modelling have undertaken and shadow diagrams with an updated legend will be submitted with the preferred project report. The shadow diagrams prepared by Foster and Partners show the shadows as they will fall on the surrounding buildings and as they will fall on the surrounding ground plane not occupied by building footprints.

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	<ul style="list-style-type: none"> Shadows from the increase in height of Block 9 will now affect our building during the winter months (52 Regent Street). Whilst I realise that this is an extreme case, I do not believe that this height is necessary, aesthetically pleasing or practical. 	<ul style="list-style-type: none"> The shadows affecting 52 Regent Street do not hit the building until after 12 midday and as such, we believe that the building will receive the approximately 2 hours of sunlight on June 21. Notwithstanding this it is noted that the proposal complies with the City of Sydney's controls and will maintain more than 2 hours to the building on March 21.
	<ul style="list-style-type: none"> Block 11 will overshadow Wellington Street which contains residential properties not just commercial ones as stated in the justification for the breach in height. 	<ul style="list-style-type: none"> Block 11 has been amended so that a 'slot' has been created which will improve solar access to those residential dwellings located on the opposite side of Wellington Street. The proposed development is expected to create a better relationship between the existing development on Wellington Street and that on Block 11 due to the greater setbacks that are now proposed which enables the provision of a larger park than that currently approved.
	<ul style="list-style-type: none"> The overshadowing of our property (45 Abercrombie Street) will cause personal loss and discomfort and will affect the value of our property. 	<ul style="list-style-type: none"> The shadowing analysis shows that 45 Abercrombie Street will not be affected by the proposed development on March 21 between the hours of 9.30am and 3pm. This property is actually affected by the existing development located on the northern side of O'Connor Street and west of Abercrombie Street. Notwithstanding this, the Block 4 building envelope has been amended to improve off-site overshadowing. Property value is not a planning consideration.
	<ul style="list-style-type: none"> Frasers' modified proposal does not value other people's sunlight highly enough. It is too tall. 	<ul style="list-style-type: none"> The modified concept plan will improve the overshadowing impacts of the development in many cases. It also complies with the provision of solar access provisions of the Central Sydney DCP.
	<ul style="list-style-type: none"> Non compliance with standards for solar access to the proposed apartments will result in an area that is socially and environmentally unsustainable. 	<ul style="list-style-type: none"> Solar access is just one aspect of residential amenity. The proposed units will have a high level of amenity due their size, location and outlook as well as the level of solar access that they receive.

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	<ul style="list-style-type: none"> The WRG (30 Balfour Street) is installing 188m² of photovoltaic cells on its roof to reduce dependency on non-renewable sources. The proposal will reduce the potential of this electrical generator as it adds 15m to the height of the existing approved building. 	<ul style="list-style-type: none"> The amended concept plan block 11 building is 1m lower than the block 11 building on the approved plan The shadow diagrams show that for the critical days of March 21st and June 21st the modified concept plan does not result in any additional overshadowing of the roof of the gallery as compared with the approved concept plan. The only overshadowing from either the approved or proposed schemes occurs very briefly on the morning of June 21st at 9am and in both situations the shadow has moved away from the roof by 10am.
	<ul style="list-style-type: none"> I fear the impact of the total development (block 6) for me because I believe I will lose all sunlight to these two windows (the only windows directly to any room on that floor of the apartment, and the room currently used as a bedroom). Frasers have not provided information about the overshadowing, but I believe the room, which currently receives sunlight from about 2pm until sunset will never again receive any sunlight after the development goes ahead (Goold Street). 	<ul style="list-style-type: none"> As noted previously, the proposal seeks consent for a building envelope on block 6. The final design of the building will be modulated and articulated and will respond to the constraints that the surrounding development poses. The details of this will be submitted in a project application which will be subject to further consultation.
Traffic and Transport	<ul style="list-style-type: none"> The proposed mix of residential / non-residential development by now proposing a 50% mix greatly reduced the required car parking. In addition, the linking of basement carparks further separates cars from pedestrians. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> Frasers reduction in parking spaces is a positive imitative as it reduces traffic flows and CO² emissions. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> With such high traffic congestion around so many streets in the area, this development application has already addressed the problem of injecting more cars into the traffic system and has designed an integrated parking facility with multiple entry and exit points, thus redirecting traffic off the local roads. This shows community consideration in an area that already suffers from high traffic congestion. 	<ul style="list-style-type: none"> Frasers have made commitment to limit the amount of parking spaces on the site to a maximum of 2,000 spaces. They have also made a conscious effort to try and move traffic movements underground to give greater priority to pedestrian and cycle movements.

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	<ul style="list-style-type: none"> The amount of parking on site will cause significant traffic movement, congestion and environmental damage. 	<ul style="list-style-type: none"> As outlined in the Traffic Report submitted with the environmental assessment, the proposed development will result in a lower peak hour traffic generation when compared with the scheme originally approved by the RTA.
Traffic and Transport	<ul style="list-style-type: none"> The huge increase in parking which the scheme allows will greatly compound the existing congestion that Chippendale suffers from. 	<ul style="list-style-type: none"> It is also noted that the proposal will reduce the amount on-site parking from 2,400 spaces to 2,000 spaces.
	<ul style="list-style-type: none"> More consideration needs to be given to pedestrian and cycling amenity around the site as well as internally. Council needs to be lobbied by the developers to make this development a demonstration of an ideal transport system. 	<ul style="list-style-type: none"> The proposed modification will significantly enhance pedestrian movement through and immediately around the site and will maintain the same level of cycle access as that in the approved concept plan. The extension of cycle paths beyond the site is outside the scope of the proposed development, and the responsibility of the City of Sydney. However Frasers agree that this would be beneficial and has been in discussions with adjacent authorities to support neighbourhood pedestrian and cycling solutions. Pedestrian and cycle networks at Frasers Broadway have been designed to integrate with the proposed Urban Pedestrian Network (UPN) and the City of Sydney's cycleways program.
	<ul style="list-style-type: none"> I was initially worried about the extra traffic congestion that would be created by the proposed development. However, in light of the modified plan, this should not be an issue. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> There isn't a sufficient provision of car spaces for the number of people 	<ul style="list-style-type: none"> The proposed development will comply with the Central Sydney LEP car parking requirements. This is consistent with all other development within Central Sydney.

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	<ul style="list-style-type: none"> We feel that O'Connor Street is very unsuited to an increased volume of two-way traffic as proposed in the modified concept plan. The additional traffic which will be created by allowing access to underground parking (Basements B and C) from both directions off O'Connor Street and the possibility of through traffic between Abercrombie and Regent Street will increase the traffic volume to an extent not well-suited to safe or pleasant pedestrian use or delivery access for businesses fronting O'Connor Street. We believe additional measures to prevent access to the underground parking driveway from the Abercrombie Street direction and/or to prevent through traffic on O'Connor need to be incorporated into the plan, perhaps through a barrier at Balfour Street. 	<ul style="list-style-type: none"> O'Connor Street will be widened as a result of this proposal and as such will be able to accommodate the level of traffic expected. O'Connor Street will be provided with 15 on-street spaces which will be subject to a resident parking scheme. It may be possible to ensure that some of these spaces are available for deliveries and servicing of local businesses. As the road will ultimately be in the Council's ownership this will be for the Council to control.
Traffic and Transport	<ul style="list-style-type: none"> As residents who make use of the resident parking spaces currently available near Balfour Street, we would also like to know what provisions will be made when these on-street spaces are removed as indicated on the plans. 	<ul style="list-style-type: none"> It is expected that the current residential parking scheme will continue to operate on this street, however this is subject to the jurisdiction of the Council and as such is something that Frasers cannot control.
	<ul style="list-style-type: none"> Concerned about the ownership of public roads which have been absorbed into the development. What structures and legislation in favour of the public are applicable now to the roads such as Carlton Road. 	<ul style="list-style-type: none"> The roads on the site which will be publicly accessible but privately owned will be subject to a Section 88b instrument which will ensure public access 24 hours a day. Most of the roads however will now be in public ownership and subject to strata titling.
	<ul style="list-style-type: none"> I would like to see parking on residential streets east of Abercrombie changed from 2 hour to 1 hour. 	<ul style="list-style-type: none"> Residential parking schemes are the jurisdiction of the Council and as such are something that Frasers cannot control.
	<ul style="list-style-type: none"> The traffic estimates are too conservative and a consideration the impacts have not been properly considered. 	<ul style="list-style-type: none"> The traffic estimates have been prepared using a computer modelling program called 'Paramics'. This is a standard practice and the same method that the RTA use to assess the traffic impacts of a proposed development.

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	<ul style="list-style-type: none"> The inclusion of 2,000 parking spaces is unsustainable and illogical. The only sustainable and rational solution is to have only limited emergency parking on the site. 	<ul style="list-style-type: none"> The objective of the Central Sydney planning controls is 'to encourage residential development in Central Sydney' and 'to improve the attractiveness and competitiveness of Central Sydney for retail and commercial activities by providing a reasonable level of tenant and short-stay public parking whilst discouraging commuter car parking'. As such it is recognised that some on-site parking is desirable on the site. If insufficient parking is provided on the site, the adverse impact will be people trying to park in local streets.
Traffic and Transport	<ul style="list-style-type: none"> Access for emergency vehicles in Goold Street and Kensington Street is all but impossible now so managing this aspect of street access when the development is complete will be interesting to observe. 	<ul style="list-style-type: none"> As Frasers now own all of the properties along Kensington Street it is their intention to negotiate with the Council to pedestrianise the street at certain times of the day. As cars will not longer be able to park in that area, emergency access should be able to be easily accommodated. Goold Street is outside of the application site and outside the scope of this application.
Residential Amenity	<ul style="list-style-type: none"> I believe the Modified Concept Plan provides a better development than the former Plan and that a world class inner-city living and work environment will result. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> A superior mixed use development comprising retail, commercial, residential, cafes, restaurants etc will transform the precinct and not only improve the lifestyle of the residents of Chippendale, but will probably have a major upliftment in the value of the properties. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> The residential component that is proposed for the site reflects world's best architecture and quality. When you consider the Fraser Property brand and quality of development around the world, quality is of the highest priority. 	<ul style="list-style-type: none"> Noted.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
	<ul style="list-style-type: none"> The watering down the rules for “sunlight” standards which apply to the apartments will result in third rate accommodation and social unsustainability. 	<ul style="list-style-type: none"> It is noted that during the assessment of the approved concept plan, the architects (COX/ATA) provided justification for the extended hours of measuring solar access (see Appendix F). Primarily the study noted that apartments can receive effective sunlight outside the hours of 9am and 3pm and as such, the study uses the hours between 7.30am and 4pm. The consultants for the modified concept plan have used the same methodology as that of the approved concept plan to measure solar access to the proposed apartments.
	<ul style="list-style-type: none"> Invasion of privacy from upper level windows and balconies of the new development having direct visual access to our rear courtyard space (45 Abercrombie) hence de-valuation of our property. 	<ul style="list-style-type: none"> The separation distance between the closest element of the Fraser's Broadway site and 45 Abercrombie Street is over 30 metres, therefore significantly exceeding the minimum separation distance of 24 metres as specified by the Residential Flat Design Code.
	<ul style="list-style-type: none"> I personally will be impacted by overshadowing, the loss of privacy and vistas as I live at 21 Abercrombie Street, directly opposite the site. 	<ul style="list-style-type: none"> It is noted that the main entrance to 21 Abercrombie Street is from a rear lane and not Abercrombie Street. Further it appears that the main aspect of these units is westerly and as such the proposed development will not have any significant impact on this property. Notwithstanding this, Block 4 has been amended to improve on-site overshadowing. In terms of loss of privacy it is noted that the proposed building envelope maintains the same separation distance as that of the approved building envelope on Block 4.
	<ul style="list-style-type: none"> Increased noise pollution in the neighbourhood with increased residential, commercial and retail, with increased truck traffic to stock the shops (usually occurring in the evening hours) 	<ul style="list-style-type: none"> All servicing of the site will occur underground within the basement area, as such it is unlikely that the servicing of the site will cause disruption to the surrounding properties.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
Residential Amenity	<ul style="list-style-type: none"> I am unable to identify from the concept plan drawings which of the buildings in Kensington Street backs onto my apartment (33-47 Goold Street) and what impact it will have. 	<ul style="list-style-type: none"> Street elevations of both sides of Kensington Street have been submitted to the DoP and additional sections showing the interface between the property in Goold Street and Kensington Street are included at Appendix A. The difference between the approved concept plan and the proposed modification is that Frasers now owns all of the properties along the eastern side of Kensington Street and intends to redevelop the strip of existing terraces as restaurant / office use spaces with outdoor seating at the rear. 42 Kensington Street will be demolished and replaced with a commercial building.
	<ul style="list-style-type: none"> I wish to formally request that the planning consents for the site prohibit any diminution of our current western angle of view – as per the revised drawing Frasers have supplied to me. (9 Goold Street) 	<ul style="list-style-type: none"> Frasers have committed to ensuring that the residents of 9 Goold Street will retain their western outlook towards the sky. A revised plan demonstrating this will be submitted as part of the preferred project application report.
	<ul style="list-style-type: none"> I submit that the careful consideration of the design and layout of Block 11 will need to take into consideration the loss of any privacy suffered by the residents of Wellington Street. 	<ul style="list-style-type: none"> This issue will be addressed during the project application stage, and will be considered during the detailed design of all the buildings on the Frasers Broadway site.
	<ul style="list-style-type: none"> The plans also suggest a restaurant for the building, together with adjoining cafes. I object to this use of the space because of the noise it will create from patrons, glasses and plates, music, rubbish collections (esp glass bottle collection) etc. 	<ul style="list-style-type: none"> This application seeks concept for the building envelopes and site layout. The specific details of the final landuse for each block and any mitigation measures for that proposed use will be submitted with the relevant project applications.
Retail	<ul style="list-style-type: none"> It is with great anticipation that we look forward to the increased retail outlets that are planned to service the area. The current facilities are far from adequate. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> The amount of retail space seems too great. 	<ul style="list-style-type: none"> The modifications propose a similar level of retail as that already approved. The proposed retail space will provide for local retailing only and will not seek to compete with other existing retail centres such as Broadway.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
Heritage	<ul style="list-style-type: none"> The creation of a 'bohemian' atmosphere at the eastern side of the development (Kensington Street) shows enormous foresight in creating a vibrant and attractive place to live. It will transform what currently could be described as a slum to a desirable precinct which will attract people to the area, in turn helping the local businesses and economy. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> The retention of the Australian hotel on the corner of Abercrombie Street seems like a rather sentimental bit of instant nostalgiaism – its not that great a building and from memory has no commendable interior spaces. In the published artist's impressions it looks silly and quite out of scale. It would improve the project if it were to be demolished and the Fosters building be allowed to make the corner itself. 	<ul style="list-style-type: none"> Noted, the design proposed seeks to ensure that the Australian Hotel is integrated and informs the design of the building on Blocks 1 and 4.
	<ul style="list-style-type: none"> The massing and scale of the buildings around the "brewery square" dominate the heritage chimney and heritage area. Blackfriars is totally lost as it sits buried alongside a huge street wall. 	<ul style="list-style-type: none"> The buildings to the north and west of the Brewery Yard have increased in height, however this has allowed for the deletion of the building to the immediate east of the Brewery Yard which means that the heritage items now sit primarily within a park context. The proposed modifications have been assessed by a specialist heritage consultant who considers that the proposal will not have any significant adverse heritage impacts and that the removal of the building on block 5 will improve the heritage amenity of the Brewery site. Blackfriars will remain highly visible when travelling towards the east on Broadway and north along Abercrombie Street. The view towards Blackfriars when travelling west on Broadway will be similar to that already approved.
Public Domain	<ul style="list-style-type: none"> We support the provision of a greater amount of public domain area for the new and existing communities. 	<ul style="list-style-type: none"> Noted.
	<ul style="list-style-type: none"> We support the improved solar access to the main park and other public areas 	<ul style="list-style-type: none"> Noted.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
	<ul style="list-style-type: none"> The area known as Wellington Park is not a park it is a nature strip running in front of an apartment building, hardly conducive to residents in the small streets behind such as Wellington and Queen Streets to utilise the park area. 	<ul style="list-style-type: none"> The area now proposed as part of Wellington Street park is now significantly larger than that of the approved development. The resultant setback of the building on Block 11 will have a significant positive impact on the amenity of those people residing on the opposite side of Wellington Street.
	<ul style="list-style-type: none"> Reinstating a street wall along Wellington Street would eliminate any benefit Wellington Street would receive from the proposed park and remove the ability for the site to interface with the rest of Chippendale. 	<ul style="list-style-type: none"> Agreed. It is intended that the existing wall will be demolished and 'interpreted' through the final landscape design. Frasers are committed to ensuring that all the new parks provided as part of the development will be publicly accessible to both the existing community and the incoming residents.
	<ul style="list-style-type: none"> The broad attempt to increase green space is very important for the site, suburb, city and state. 	<ul style="list-style-type: none"> Frasers agree and have sought to increase the amount and quality of the public domain on the site.
Public Domain	<ul style="list-style-type: none"> I am concerned with the loss of publicly owned space on the site for what I suppose are cynical reasons, in the suspicion that space available for development will probably eventually be used for development. I think that given the heritage nature of the site and its importance to the city and probably the state eventually if the green initiatives go ahead, public ownership and control is vital and a loss of control would virtually negate the time and effort spent by the site and the state at arriving at this point. 	<ul style="list-style-type: none"> The amount of public domain will be significantly increased as a result of the proposed modifications. The elements of the public domain which will be in private ownership will be subject to a section 88b instrument which will outline the permanent provision of public access to those parts of the site. It is likely that these will be subject to a <i>Publicly Accessible Areas Management Plan</i> which will be agreed with Council.
Public Domain	<ul style="list-style-type: none"> The project has effectively become a gated community with little permeability to the surrounding suburbs. 	<ul style="list-style-type: none"> With the development of the Old Kent Brewery the public will gain general access to this site for the first time in over 100 years. Building designs, open space and the laneways have been specifically directed at increasing accessibility, permeability and walkability for the public. The provision of restrictions on the title will make it very difficult for public access to open space elements of the site to become privatised.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
	<ul style="list-style-type: none"> I strongly object to any part of the open space being private space, all open space on the site should be available for use by residents of Chippendale. 	<ul style="list-style-type: none"> The existing community will have the same level of access to the public open spaces proposed as part of this development as that of the incoming population. This will be reflected by landownership and section 88b instruments.
	<ul style="list-style-type: none"> Despite the requirement for an arts strategy in the previous concept plan for the site, there is little evidence that this has been pursued by the developers. 	<ul style="list-style-type: none"> Frasers have engaged an arts consultant to prepare a public art strategy and to advise on which existing structures on the site should be retained for re-use prior to demolition works commencing. These items have now been salvaged and are being stored for future reuse on the site. The public art commitment made in the original concept plan has been retained as part of this application (Refer to commitments 40 through to 42). The public art strategy will be provided with the first application for construction of a building or the public domain – whichever is submitted first Prior to their development, the Kensington Street terraces and warehouses are being offered to artists as temporary studio space. This not-for-profit venture is being managed by Queen Street Studio on behalf of Frasers Property. If suitable works are undertaken by local artists during their residency these will be considered for integration in the development.
	<ul style="list-style-type: none"> The mixed use zoning for open space, including Balfour St Park 	<ul style="list-style-type: none"> It was not intended that Balfour Street would be included within the Mixed Use zone. This drafting error has now been rectified and will be included in the preferred project report.
Voluntary Planning Agreement	<ul style="list-style-type: none"> I object to the changes to the VPA which allow \$2,500,000.00 promised to the Chippendale Community for community facilities to be used outside of Chippendale. 	<ul style="list-style-type: none"> The VPA maintains a payment of \$2.5 million to the Council for a new community facility. The location and use of that money is to be determined by the Council and is beyond the control of Frasers Broadway Pty Ltd. It is understood however that the Council intends to use those funds for a facility within the Chippendale area.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
	<ul style="list-style-type: none"> ▪ The proposal seems unlikely to provide many affordable housing options to students or young workers 	<ul style="list-style-type: none"> ▪ A range of accommodation will be provided on the site which will provide for a range of household types.
Housing NSW	<ul style="list-style-type: none"> ▪ Requests the Department review the revised VPA to ensure that the contribution rate towards affordable housing is at least equivalent to that provided under the original VPA. 	<ul style="list-style-type: none"> ▪ The changes to the VPA for affordable housing are the result of several detailed discussions with the Redfern Waterloo Authority (RWA). ▪ The changes are proposed to provide certainty to both the RWA and Frasers Broadway as to the contribution amount that will be payable.
State Transit	<ul style="list-style-type: none"> ▪ I refer to our recent telephone conversation (of today) and confirm State Transits' concerns regarding any proposed adjustments to the intersection of Broadway and Jones St, Sydney. This intersection currently caters for three bus services and provides a direct link to strategic corridors used by these services. The previous application suggested relocating services to the intersection of Wattle Street and as mentioned, I don't believe that such an arrangement, under the current road configurations could be achieved. As such, it is imperative that this Jones Street facility remain available to bus services 	<ul style="list-style-type: none"> ▪ The proposed modifications do not involve any changes to the new intersection at Broadway which was approved as part of the original concept plan. ▪ The closure of Jones Street is an initiative of the City Council. ▪ Northrop are preparing intersection designs which will be submitted to the RTA for the three proposed intersections at Broadway, Regent Street and Abercrombie Street. At this stage it appears that they can successfully accommodate the required lanes, however the final design will be subject to assessment by the RTA.
RailCorp	<ul style="list-style-type: none"> ▪ RailCorp generally supports the proposed modifications to the CUB site, however it is noted that RailCorp's concerns regarding access between this site and the Central Station Precinct have not adequately been addressed. 	<ul style="list-style-type: none"> ▪ As part of the VPA agreed between the DoP and the landowner the following new signalised at grade pedestrian crossings will be provided: <ul style="list-style-type: none"> - across City Road at Myrtle Street to Victoria Park - across Regent Street to improve access to Prince Alfred Park ▪ The signalised crossing at Regent Street will provide an alternative means for pedestrians to walk to Central Station.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
	<ul style="list-style-type: none"> Under the Transport and Access section of the Director General's requirements, the proponent was required to address, among other things, "(d) pedestrian connection to heavy rail services and the major bus interchange at Central/Broadway". While it is noted that a map was provided showing links within the site, neither the map nor the traffic report indicate neither the routes to be taken nor the works required to facilitate the use of these routes. The primary access route from the Fraser's Broadway site to the railway station is likely to be via Regent Street, Lee Street and Devonshire Street Tunnel. RailCorp believes that this pathway includes pedestrian footpaths that are not wide enough to handle the crowds that are likely to move between these two sites, especially in the morning peak. There are also safety and accessibility issues associated with Henry Deane Plaza, due to the non-compliant gradient of the pedestrian ramp and other pedestrian facilities, such as steep stairways. The capacity of the Devonshire Street Tunnel is limited. Currently during the morning peak there is a significant volume of pedestrians moving towards Railway Square from the station. The pedestrians from the Fraser's site would contribute to the contra-flow through the tunnel which is expected to cause considerable congestion. RailCorp requests that the Department seek clarification of the above issues before considering the approval of the project. Some of these access issues may also need to be addressed in any contributions plan. Furthermore it is noted that the proponent has been in contact with RailCorp in regard to a potential connection from the CUB site directly to the Devonshire Street Tunnel, under Regent Street and Lee Street 	<ul style="list-style-type: none"> It is noted that this application seeks an increase of less than 10% of the approved floor space, as such the proposed modifications are not considered to have a significant impact on the number of footpath movements to the station compared to that already approved.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
NSW Fire Brigades	<ul style="list-style-type: none"> Access for emergency vehicles – We require 6m unobstructed road width where the aerial rescue appliances may be required to operate. This would be for buildings less than 25m in height. Buildings of greater height require sprinkler systems under the BCA due to access limitations for these appliances. 	<ul style="list-style-type: none"> Noted. These requirements will be addressed in the detail design documentation for the relevant project applications,
	<ul style="list-style-type: none"> Hydrants on water mains – As the specifics of individual buildings are not yet available it is not known whether all of them will include installed fire hydrant and booster systems. However, even if this proves to be the case, the NSWFB still require hydrants on street mains to access water for incidents occurring outside buildings such as vehicle fires, chemical spills etc. 	<ul style="list-style-type: none"> Noted. These requirements will be addressed in the detail design documentation for the relevant project applications,
RTA	<ul style="list-style-type: none"> The proposal to relocate the proposed traffic signals to O'Connor Street may result in hazardous cross traffic movements between Blackfriars Street and Irving Street. In order to overcome this movement Blackfriars Street is to be restricted to left turns only and Irving Street to right turns only. These restrictions should be reinforced with raised concrete islands or other form of acceptable barriers. 	<ul style="list-style-type: none"> Noted. Northrop has been commissioned by Fraser's Broadway Pty Ltd to develop the detailed design of the proposed intersections. The supporting documentation to be submitted with the intersection design will demonstrate that the proposed location is suitable and more desirable than that of the approved intersection location.
	<ul style="list-style-type: none"> Points 4 through to 10. 	<ul style="list-style-type: none"> Noted. Compliance will be demonstrated in the relevant detailed project applications.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
Ministry of Transport	<ul style="list-style-type: none"> ▪ The Ministry is generally supportive of the proposed amendments to the approved concept plan. It requests further clarification in regards to the following matters: ▪ The preparation of detailed car parking strategy which seeks to minimise car parking demand through innovative measures such as car-share and Green Star reserved spaces. ▪ The application of Travel Demand Management (TDM) measures to further reduce the number of car based trips to the subject site by future residents and employees. ▪ The development of an effective and integrated pedestrian and cycle network that can promote the increasing use of these modes for access to the proposed development. 	<ul style="list-style-type: none"> ▪ The following information will be submitted with the relevant project applications: <ul style="list-style-type: none"> - Car Parking Strategy - Travel Demand Management measures ▪ Details of the proposed pedestrian and cycle network have been provided as part of the modification documentation.
Sydney Water	<ul style="list-style-type: none"> ▪ The impact of the proposed development will be assessed when the proponent applies for a Section 73 certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess whether amplification and/or changes are applicable 	<ul style="list-style-type: none"> ▪ Noted. It is likely that the water treatment plant and the on-site water reuse will result in minimal demand on potable water on site.
	<ul style="list-style-type: none"> ▪ Demolition of existing Sydney Water infrastructure is not permitted without seeking prior approval. 	<ul style="list-style-type: none"> ▪ Noted. A separate application has been approved for the demolition of existing buildings and some existing site infrastructure. Separate approval has been sought from Sydney Water for the works relevant to Sydney Water's infrastructure. It is noted that this application does not seek consent for any physical works and that separate infrastructure project applications will be lodged in the future.
Sydney Water	<ul style="list-style-type: none"> ▪ Land ownership in section 4.14 of the modified concept plan, does not indicate whether current Sydney Water easements will need to be retained or reviewed. Sydney Water will require easements to access all Sydney Water owned infrastructure on the site. 	<ul style="list-style-type: none"> ▪ This issue will be addressed during the detailed design of infrastructure on the site.

KEY ISSUE	COMMENTS MADE	FRASERS RESPONSE
	<ul style="list-style-type: none">▪ All customers discharging trade water into Sydney Water's wastewater systems must have written permission from Sydney Water.	<ul style="list-style-type: none">▪ This issue is not relevant to the concept plan application. Rather it will be addressed as part of any fit-out application for any relevant commercial or retail space.