

18 December 2006

## CUB Site – General Submissions in response to Concept Plan Application

No	Issue	Proponent's response
	<b>Character</b>	
1	Will gentrify area which is the gateway to the city.	The socio economic profile of the resident population will be determined by the nature of the ultimate development.
2	Creates a block of densely packed buildings that would be out of character with rest of Chippendale as well as comparable inner city areas.	The individual blocks are a generally of a similar density as development to the north in Pymont and Ultimo and southern edge of the CBD.
3	Buildings on southern boundary too large, uniform and high do not blend with Chippendale.	The built form is a building envelope and not a building. A fully resolved building/s will not appear uniform to the extent that the building envelopes that form the concept application maximum massing envelopes do. The permissible height of development under the provisions of SLEP 2005 is 15m on the southern boundary to a depth estimated to be 20-30 metres and than stepping up to 45m. The proposal applies the existing 15 metre height limit along the southern boundary to Wellington Street, increasing in height to the north set by a sloping solar access plane to limit overshadowing of the adjoining land to the south.
4	The development will be like others recent developments concrete walkways, between tall buildings, wind tunnels....rabbit warrens. Little more than dormitories – stark, desolate and soulless	The majority of blocks will range in height from 20m to 50m. The tallest buildings are located on the north eastern effective perimeter of the site on Broadway and Kent Road. The height above ground of building envelopes including plant are Block 1 (60m), Block 2 (120m), Block 5 (100m), Block 9 (65m). The proposed development will introduce new laneways consistent with the City of Sydney's recently announced laneways revitalisation programme and will be shared pedestrian zones and include active uses such as cafes

		restaurants and bars and other businesses.
5	Height out of character with area.	See above comments
6	High density takes away character of Chippendale.	See above comments
7	Density should be in line with surrounding area	The maximum permissible height in the surrounding area immediately to the east is 25 metres and covers a small pocket between Kensington Street and Lee Street. The land beyond further to the east is affected by a maximum height of 50m. To the south as outlined above, the proposal applies the existing 15 metre height limit along the southern boundary to Wellington Street, increasing in height to the north set by a sloping solar access plane to limit overshadowing of the adjoining land to the south. Generally the proposed development reflects the street wall height of adjoining development, although the height achieved above the street wall height within sloping planes to the north, results does in scale and bulk result in a built form that is greater than that of the immediate adjoining areas, it is consistent with the recommendations of the EAP report.
8	Four high rise buildings proposed is too many and as the site borders with Chinatown would seem visually intrusive.	It is estimated that the two towers proposed on Block 2 are most likely the built form that will be visible from Chinatown, with the existing UTS tower in the peripheral foreground.
9	Proposed buildings should be graduated in height towards Abercrombie Street.	There is a transition in height between Block 2 and Block 1. The Australian Hotel acts a mediating building form at approximately 20m between the proposed height of the building envelope west of Carlton Street at 60m and Abercrombie Street. The built form proposed in Block 4 is the height of existing development. Block 8 ranges from 25m at street frontage height and increases to 45m, back from Abercrombie Street
10	No consideration is given to the existing controls in the immediate surrounds, which limit development between 6 to 12m for the greater area. Nor is any consideration given to the height controls to the immediate north range from 9m to max of 42m with 50m applicable for the southern central business district.	See comments above

	<b>Environmental</b>	
11	Overdevelopment leading to an excessive use of electricity	The proposed development will be capable of and will be required to meet Green Star and BASIX targets. In addition, the Draft Statement of Commitments includes an undertaking to investigate the feasibility of cogeneration.
12	Increased density in the city will ease development (pressure) in the suburbs	Noted
13	Park will be overshadowed and when considering the increase in population will not result in a net gain of green open space.	<p>The proposed controls protect sunlight during the same period as elsewhere in Central Sydney.</p> <p>On June 21, 30% of the park (approximately), will be in sunlight until 2pm. On April 14 the proportion of park in sunshine increases to 75% between 12 noon and 2 pm.</p> <p>At the Equinox, the proportion of the park in sunlight increases to 100% between 11am and 2pm. In addition at the Equinox, at 9am 50% of the park is in sunlight, at 10am, the proportion increases to 75% and at 3pm approximately 90% of the park is still in sunlight. This represents a high standard of solar access in an inner city environment.</p> <p>The park will result in a net gain of approximately 5,000sqm for Chippendale.</p>
14	Removing the sunlight and leaving what is left is tokenism.	See comments above.
15	Public green space is minimal when compared with GFA and area will be in shadow for much of the time.	The area of park provided is consistent with a general requirement of approximately 10% of site area for brown field sites. The City of Sydney proposed that one single area of public open space of a minimum area of 5,000sqm or approximately 10% of the site area be provided. No other site in the Central Sydney has been required to provide public open space, for development at much higher densities of residential population. In addition, the site is close to significant public parks including Prince Alfred Park and Victoria Park.

16	Proposed park is too small, lacks open space, is largely overshadowed and does not link with existing residential areas.	See comments above. The park adjoins the existing neighbourhood to the south and is proposed to be linked through a system of linear parks linking into the east and wets, facilitated by signalised pedestrian crossing at Abercrombie Street.
17	Wind tunnel resulting from scale of development	<p>The proposed building envelopes and the configuration of the massing on the site will result in some conditions under westerly and southerly winds which may result in uncomfortable walking conditions e.g. Tooth Ave during easterly winds and westerly and southerly winds may cause discomfort and funnelling through internal and narrow passages on the site. Equally the towers proposed on Block 2 will ameliorate wind conditions on Broadway. The Heggies report makes conclusions and recommendations that indicate conditions can be managed and ameliorated by design intervention:</p> <ul style="list-style-type: none"> <li>i. Existing westerly wind conditions at various locations along Broadway already exceed the Sydney City Council (SCC) benchmark 16 m/sec walking comfort criterion. The highest winds occur as westerly winds channelling along Broadway combine with the effects of downwash flow from taller developments along the roadway.</li> <li>ii. With the proposed Concept Plan it is predicted that there will only be a marginal change to the westerly wind condition. For winds approaching the site from the south there will be a general reduction in wind intensity along Broadway, in particular at locations in the vicinity of the UTS tower.</li> <li>iii. High wind velocities are likely to be experienced at localized ground level locations intermittently distributed throughout the proposed passageways internal to the site. Higher winds at these locations are the result of complex flow combinations of channelling and funnelling between gaps, flows accelerating around building corners and previously described downwash effects.</li> </ul>

		<p>iv. Windbreak treatments at locations exceeding the SCC 16 m/sec walking comfort criterion will be investigated during the detailed design phase of the project. Such amelioration treatments will be refined utilizing more precise environmental wind tunnel test studies to accurately identify wind hot spots and quantify the impact of wind mitigation options. These would include judicious placement of street trees and building treatments such as footpath awnings.</p>
18	Dirt and noise from Construction	Management issue at the Project Application stage
19	Noise pollution from residents in high rise buildings	Noted. Noise mitigation measures through acoustic treatment of glazing will be required to keep noise from external sources affecting the amenity of incoming residents. It will therefore mitigate noise generated by incoming residents.
20	The proposed main park located to the south east of the towers will not receive adequate sunlight for the growth of soft landscaping. The proposed parks in the development will only be partially useable by the community due to the direct sunlight in the height of summer and little or no sunlight at other times.	The park will enjoy sunlight sufficient for healthy growth of landscaping. In those areas that will be affected by shadow shade tolerant plants can be introduced. Shade canopies and or trees will provide shade during the summer months. The details of the park design will be a matter for the public authority in consultation with residents.
21	Adequate parkland to be provided with adequate sunlight.	Noted. See comments above.
21	The main park will be largely in shadow.	See comments above.
22	<p>The city's independent review identified the need for a minimum of 9,000 to 12,000sqms of open space.</p> <p>The main park is in shadow and has inadequate solar access and bulk of the buildings.</p> <p>Tooth Ave is in shadow most of the year and does not have adequate light due to the wall and height of buildings to the north along Broadway... this is not in keeping with successful public domain outcomes.</p> <p>Concerns have been raised from the public community regarding soil remediation and pollutants.</p>	<p>The City of Sydney proposed one single area of public open space of a minimum area of 5,000sqm or approximately 10% of the site area. Additional areas of public open space are also proposed by the proponent. The total open space is equal to 5,381sqm.</p> <p>Tooth Avenue, consistent with the majority of east west streets in the city, with a podium tower configuration will be in shadow other than in the morning and afternoon. The CSDCP 1996 requires a podium height of between 25m to</p>

		<p>45m. The podium height east of Balfour Street is 25m. The street wall height of development west of Balfour Street is 45m. This is also consistent with the EAPs recommended heights and contained within the DGRs requirements. The proposed width of Tooth Ave, consistent with the standard city street width, will facilitate solar access.</p> <p>Parts of the site will require remediation and this will need to be undertaken to the standards required by the Department of Environment and Conservation.</p>
<b>AMENITY ISSUES</b>		
23	The height of the proposed residential towers is excessive and will cause overshadowing.	The towers will generate shadows. However, the building envelopes are contained within the height planes of the solar access planes. Therefore the extent of overshadowing resulting from the building envelopes is within a level considered to be acceptable in terms of amenity and environmental effect.
24	Residents themselves will not receive adequate sunlight.	Solar access of a minimum of two hours to 70% of residential apartments meets the requirements for medium to high density development under the provisions of SEPP 65. This will result in a higher standard of solar access than is normally achieved in central city under the requirements of CSDCP 1996.
25	Area is already over established.	The site is an obsolescent industrial site now underused and ready for redevelopment.
26	Tall buildings will block sunlight to existing housing.	A detailed analysis has been undertaken of the impact of the proposed development on surrounding premises. These are described in JM Modelling report included as <b>Appendix A to submissions report</b> . The extent of overshadowing with few exceptions will be within the requirements of the guidelines contained in SSDCP 1998 and CSDCP 1996. Areas where increased overshadowing has been identified include Wellington Street, O'Connor Street and the Blackfriars buildings in Abercrombie Street
27	Replaces current eyesore buildings, hides UTS tower, maintains heritage, proposed building heights will not impact existing residents.	Noted.

28	Overdevelopment, minimal open space in proportion to the increased population. Recommendations of Design Jury experts ignored, should include design excellence as a primary consideration.	See Comments above. Design Excellence provisions are included in the proposed SEPP amendment. The current scheme is generally the result of the City of Sydney's design excellence process. Future application above 25m will be subjected to a design excellence process. The views of the jury report have been considered and a further design development process of the concept plan has been undertaken in the 2-3 years since the competition.
29	FSR excessive. Increase open space areas and run park along Wellington Street to provide better access for existing residents and sunlight to park.	The maximum permissible FSR under SLEP 2005 is 4.18:1. The proposed FSR is 4.36:1(FSA) or 4.23:1(GFA). The maximum FSR is exceeded by 0.18:1 or 4.3% and is within the range of variation contemplated by the SLEP 2005 of up to 10%. This is equivalent to a GFA 10,431sqm..
30	Block 11 street facades too high	Block 11 adjoins Wellington Street. The street wall height is 15m. This is equivalent to 3-4 storey residential building and an appropriate transitional height. The SLEP 2005 maximum permissible height is 15m stepping up to 45m.
31	FSR Excessive	See Comments above
32	Overshadowing	The extent of overshadowing generally complies with provisions contained in SLEP 2005, CSDCP 1996 and SSDCP1998. Areas where increased overshadowing has been identified have been examined more closely, these include Wellington Street. O'Connor Street and the Blackfriars buildings in Abercrombie Street.
33	UTS should not be used as a reference point.	The EAP has formed the view that the UTS marks the south western gateway to the CBD from Parramatta Road and Broadway. A built form of similar scale on Block 2 will reinforce the gateway concept.
34	Residential amenity/ too many units will not have sun access/substandard accommodation/density excessive/slum/crime and safety	Residential amenity is predicted to generally comply with the provisions of SEPP 65 over the site as a whole and at a standard generally higher than can be achieved in the city. Where building orientation limits solar access building orientation will provide good outlook and aspect to open space where possible. The concept plan has been designed in accordance with

		CPTED Principles.
35	FSR should be reduced (to create) a buffer on Wellington Street between existing dwellings and new development.	See Comments above.
36	Blocking Views	The CUB land is an enclosed island site. With redevelopment views and vistas will be opened up to celebrate important heritage buildings previously hidden from public view. In addition the creation of new streets will open up new vistas. Some existing views may be lost or diminished but the overall visual permeability will increase.
37	<p>Density of the development is over development of the site and excessive. The impact on the community has not been considered.</p> <p>The proposed heights of the buildings are out of context with the terraces in Abercrombie St and Blackfriars St. Shadow impact on Abercrombie St and Blackfriars St is of a serious concern. The shadow diagrams provided are misleading.</p>	<p>A detailed analysis of overshadowing has been undertaken. See JM Modelling report included as <b>Appendix A</b> to submissions report.</p> <p><b>No 21 to 26 Abercrombie Street</b> The analysis shows additional shadowing falling on 4 upper level windows at 9.30 to 10am on June 21. At the 10.30 the building will experience additional sun on the lower level windows and by 11am the shadows are of the building façade and solar access conditions improved by on average 15 minutes.</p> <p><b>Nos 41 to 67 Abercrombie Street</b> Between 9am and noon on June 21 nos. 57 to 67 are affected by less solar access on average 10 to 15 minutes. Between 9.30am and noon on June21 nos. 51 to 56 are affected for an average period of 30 mins (with 55 Abercrombie affected by -46 minutes). Between 10am and noon nos. 41 and 51 are affected for an average of 30mins. No new shadow is cast after noon.</p> <p>The shadow analysis indicates that the impact on Blackfriars is minimal.</p> <p><b>9 to 15 Blackfriars Street</b> At 9am on June 21<sup>st</sup>, 6 westerly top floor windows, 4 westerly second floor windows would be unencumbered. By</p>

		<p>9.20am on June 21<sup>st</sup>, shadow from the proposed development has passed the facades of this property. Solar access to windows would be as per the existing condition for the remainder of the day.</p> <p><b>17 Blackfriars Street</b></p> <p>All windows are overshadowed by existing development at 9am on June 21. By 9.25am the top floor windows would be unencumbered. By 9.40am the first floor windows would be unencumbered. Solar access would improve for the rest of the day.</p>
38	The proposal reneges standards for solar access hours per day. This will affect the quality of life for residents in the area.	See Comments above.
39	The height of the proposed buildings will block local vistas and create overshadowing and reduce local amenity and liveability.	See Comments above
40	<p>Height and overshadowing of the proposed towers will cause significant loss of sunlight, daylight and outlook for existing future residents of Chippendale. The heights of the buildings should be reviewed.</p> <p>Loss of afternoon sun is of concern to the residents of Goold, Kensington and (east) Regent Streets.</p>	Discussions have been held with residents of Goold Street (7 and 9). The building envelope adjoining the terraces can be modified to overcome the concerns of these residents in terms of the immediate potential impact of adjoining building envelopes by setting the building back off the boundary and stepping back. <b>See Attachment B to submissions report.</b>
41	Impacts raised concerning local residents include: high dominating towers, excessive overshadowing, excess carparking and high traffic, narrow laneways, density, size and scale of buildings along Chippendale's heritage and low-rise neighbourhood, excessive GFA, impact during construction phase and wind tunnelling effects.	See previous issue specific comments.
42	Significant sun access issues and concentration of development.	See Comments above.
43	Height and FSR is excessive. Units will have unacceptable access to sunlight.	See Comments above
44	Density is excessive and will create too much noise and brightness. Overdevelopment of the site. Heights proposed do not show a transition from the CBD to Chippendale.	See Comments above

	Overcrowding as a result of the development.	
45	Given the height and density implications from the concept plan solar access is considered a critical issue. (The shadow diagrams provided in the report are difficult to read).	See comments above
<b>HERITAGE ISSUES</b>		
46	Loss of heritage buildings	<p>The Concept Plan provides for the extensive retention and conservation of heritage buildings, structures and spaces within the proposed development, especially those associated with the history of brewing on this site. In terms of the extent of retained heritage items, it provides a very high degree of compliance with the significance assessments of the Heritage Council of NSW endorsed 2005 Conservation Management Plan (NBR5, August 2005). The number of buildings and other elements proposed for retention by the Concept Plan substantially exceeds the 8 items (some of these are groups of buildings) listed on the Sydney LEP 2005 (i.e. 5 heritage buildings, 1 building element, 1 archaeological /townscape/ landscape item and 1 heritage streetscape).</p> <p>The Concept Plan proposes that the vast majority of buildings and other elements assessed in the Conservation Management Plan as being of Moderate or higher significance would be retained and re-used. The exceptions are Buildings 13A, 32, 35A and 35B, all of which were assessed as being of Moderate significance, and none of these are listed on Sydney LEP 2005 as individual heritage items. Moreover, Building 13A (Carpenters Workshop) was subsequently analysed in detail and assessed as being of less than Moderate significance.</p> <p>The Concept Plan also proposes that all of the roadways and other landscape elements listed in the 2005 Conservation Management Plan be retained and reopened for public access, and that a number of items of industrial heritage also be salvaged and reinstated (at least in part) on</p>

		<p>the site for interpretive purposes.</p> <p>Importantly, the redevelopment proposed under the Concept Plan has the potential to enhance the public understanding of the cultural significance of the site. The Heritage Impact Statement (GML, October 2006) proposes that groups of significant buildings with historic and/or functional relationships should be retained and conserved together so as to provide a basis for interpretation of the history and operation of the former CUB site. It further proposes that Specific Elements Conservation Policies should be prepared for all identified heritage buildings that the Concept Plan proposes to retain and conserve, and that these should provide policies for the physical conservation requirements of the buildings, and for their appropriate future uses and interpretation (refer to Section 9.6.1).</p> <p>The Concept Plan for the CUB site recognises and responds to the range of heritage values that have been identified for the context of the CUB site, the site itself, and the individual buildings, elements and precincts that collectively contribute to its heritage significance, particularly as a nineteenth and twentieth century industrial complex with a primary focus on brewing.</p> <p>The retention and adaptive reuse of a very substantial number of heritage buildings and other items will maintain links with the history of the site, and ensure important elements of the area's fabric and history figure prominently in the new development.</p> <p>It is useful to note the advice from the NSW Heritage Council, dated 1 December 2006, which states (inter alia) that:</p> <p><i>"The Heritage Council, consistent with the findings of the Heritage Impact Statement, recognises that the proposal will have both positive and negative impacts on the specific items and on the site as a whole. The Heritage Council</i></p>
--	--	--

		<p><i>notes that a number of the adverse impacts are based on the need to achieve improved urban design objectives. The Heritage Council would therefore be supportive of any further feasible improvements that can be made to achieve further heritage outcomes for the future of the site.”</i></p>
47	Loss of ‘Sunburst’ building	<p>The term ‘Sunburst Building’ has been used by some submissions to refer to Building 35A, which forms the north-east corner of the Irving Street Brewery complex. This building is actually known as the Bright Beer Plant, although it has had a number of uses as brewing technology at the site has developed. The Irving Street Brewery (including the Bright Beer Plant) was built in 1912 to the design of architectural firm Halligan and Wilton, and is much-altered four storey Federation style industrial building of face brick with arched openings and expressed sandstone parapets, keystones, voussoirs and lintels.</p> <p>It is misleading however to refer the Bright Beer Plant as the “Sunburst Building”. The sandstone detailing that gives this decorative character is shared amongst the group of buildings that collectively comprise the Irving Street group. In fact, the degree of decorative sophistication that is achieved within the complex is most evident in Building 22 (the Filtration Building) and Building 23 (the Malt Silo building). The treatment of the two sandstone cartways to the Irving Street façade is particularly notable, and it is due to this attention to detail and relative intactness that has led to the significance of these two buildings being rated as High (refer to Figure 128, Conservation Management Plan – NBRS, August 2005). Most importantly, these two buildings form the frontage to Irving Street, and will be a very prominent form within the new development, especially when viewed from the proposed new park south of Irving Street (refer to Figure 9.1 in the Heritage Impact Statement – GML, October 2006).</p>

		<p>Buildings 22 and 23 are partially visible from the public domain in Abercrombie Street, and it is possible that submissions expressing concern at the loss of the “Sunburst Building” may be based on a misunderstanding that they may be demolished – when in fact they are to be retained and conserved.</p> <p>The remaining Irving Street Brewery components are rated as Moderate, except for Building 35C, which as a more prosaic addition built in 1939 is rated as Neutral. Nevertheless, Building 26 (Gas Receiving Station) and Building 30 (Old Boiler House), which also exhibit aspects of the sandstone decorative approach that characterises the complex as a whole, are also being retained. The iconic 1912 Irving Street Brewery chimney will remain, and the brewery yard in which it is located will be opened up by the removal of later intrusive elements.</p>
48	Warehouse adaptations as a sensitive re use of former industrial areas appear to be lost	See GML comments above.
49	Impact on St Benedict’s Church	<p>The St Benedict’s Church complex is located on the corner of Abercrombie Street and Broadway, opposite the Australian Hotel and adjoining terrace houses. The Heritage Impact Statement (GML, October 2006 - Section 6.2.3) already specifically addresses the effect of the Concept Plan proposal on the complex, and concludes that views of the church from the north side of Broadway, facing southwest, would not be significantly affected by the proposed development, as the existing views are restricted by the Australian Hotel from most angles until the viewer is in close proximity to the complex itself.</p> <p>It further states that the scale of the proposed development, especially that proposed for the Broadway frontage of the CUB site (notably two 45m high buildings immediately east of the Australian Hotel), would introduce a mid-distance built form of a scale and bulk sufficient to affect the backdrop of</p>

		views of the St Benedict's Church group from the west, but not to the degree that the heritage significance of the complex or its setting is substantially affected.
	<b>TRAFFIC</b>	
50	Maintain low traffic flow and continue availability of resident parking	On site car parking spaces consistent with the provisions contained in SLEP 2005 are proposed.
51	Traffic congestion and parking	The proposed development yield and its associated traffic generation have been reviewed and modelled independently by the RTA. This review found that proposed new intersections would operate with a satisfactory level of service. Also, the traffic impacts of the proposed development are considered acceptable.
52	Increased traffic	The site is located adjacent to a myriad of public transport options. This combined with low on site parking provision will ensure low site traffic generation.
53	Impact on local traffic	The internal road network and road connections to the site have been developed to minimise traffic impacts on existing surrounding local streets by providing new intersections on surrounding arterial roads. Access for surrounding Chippendale residents to roads such as Regent Street will be improved by the proposal.
54	No need for the large number of car parking places considering proximity to public transport	<p>The CUB site is close to one of the City's major interchanges at Railway Square / Central Railway and has high frequency bus services in close proximity that serve a wide range of origins and destinations. Similar car parking provision exists through out the centre of the Sydney CBD notwithstanding the proximity of most development sites to good public transport services.</p> <p>The proposed parking provision is in accordance with the constrained parking rates of the existing City of Sydney LEP.</p>

		<p>A significantly lower on-site parking provision would have the effect of:-</p> <ul style="list-style-type: none"> <li>• Increased demand for on-street parking in the area</li> <li>• Biasing demographics of CUB residents away from the aged/women/families who need cars for use in the evening / weekends</li> </ul>
55	Use of public transport should be promoted as much as possible	The Transport Management and Accessibility Plan recommended the implementation of Green Travel Plans for all new employees. Public transport information would be provided as part of welcome packs for new residents.
56	Existing road network will not sustain the increase in traffic	The RTA has confirmed through their independent modelling that the surrounding road network can sustain the traffic generated by the site.
57	Insufficient car parking for new residents will lead to unavailability of on street parking for current residents	The existing surrounding residential streets are currently protected from parking intrusion by the implementation of resident parking schemes. Residents of this site would not have access to these parking schemes.
58	Opening of Irving Street into Black Friars – no impact assessment	The traffic flows through this intersection have been analysed in both the proponent's model and the independent RTA modelling. Both these models showed the new signalised intersection at Abercrombie Street / Blackfriars Street would operate with a good level of service with minimal site traffic travelling through Chippendale west.
59	Amount of car spaces too high considering low car ownership of inner city residents	The proposed parking provision is in accordance with current LEP rates.
60	Traffic analysis undertaken for weekday only.	The modelling for the site has focused on periods when the road network serves the maximum existing hourly flows and consequently the traffic impacts of the development would be most felt. This is usual traffic engineering practice.
61	Shortage of cycle paths/cycle lanes should be off road	The site provides shared zones connecting Broadway in the north to Wellington Street in the south which would provide safe cycling environments for a wide range of cyclists.
62	Pollution (from traffic)	People who reside at this site would generate significantly lower pollution than if the same residents moved to a Greenfield site on the fringes of the Sydney metropolitan area as residents will have a higher proportional use of

		public transport / walking / cycling for their daily trips.
63	The applicant is not proposing to reduce traffic or car useage by proposing 1634 car spaces. Access via Irving St with an intersection at Abercrombie St is not acceptable.	No objection has been raised to the proposed arrangement by the various traffic authorities and in particular the RTA.
64	The density of the development will result in major vehicle movement per day impacting on the quiet neighbouring streets.	See Comments above
65	The proposed development is not promoting the use of public transport. The proposal is encouraging the use of private motor vehicles. Access to car parks should be off the wider roads rather than the narrow laneways.	Access is proposed off laneways as better option in terms of continuity of street frontage and uninterrupted pedestrian movement along primary street frontages and footpaths. The laneways are proposed as shared zones with pedestrian movement and vehicular traffic movement managed by well established techniques and methods that ensure safety and comfort for pedestrians.
66	Too many parking spaces proposed considering proximity to public transport. The large number of car spaces will encourage private car use.	See Comments above
67	Excessive amount of car spaces proposed. Broadway does not need heavy reliance on motor vehicles.	See Comments above
68	Parking spaces on site will encourage private car use.	See Comments above
69	The proposal does not meet best practice given the car parking provision. The proposal provides 2300 car spaces. The concept plan fails to encourage cycling, walking and the use of public transport.	See Comments above
	<b>ECONOMIC</b>	
70	Too much of the site is being devoted to residential – city would be better served by higher commercial component	Noted.
71	Site currently underutilised	Noted.
72	Retail floor area 100% greater than that recommended by Mapinfo Dimasi Quantity of retail floor area not justified by proponents own market assessment	Apart from a supermarket and a variety of convenience retail specialty shops that are intended to occupy about 7,500m2 – 8,000m2, the balance of the ground floor retail areas that

		are proposed, comprise a mixture of commercial, tertiary uses, services, ground floor entry foyers and other uses not traditionally retail in nature but utilised as ground floor activation uses. These additional ground floor uses will be developed over the life of the project anticipated to be 10 plus years.
73	Amount of retail floor space will create a destination retail centre inconsistent with the established retail hierarchy of the local region	The relatively small quantity of retail space proposed is unlikely to threaten the established retail hierarchy of local retail areas.
74	Increase in residents will be beneficial to local businesses	Noted
75	Save taxpayers money infrastructure and services already in place Will lower value of apartment due to lack of privacy	Noted
76	Financial greed is designing the development.	Noted.
<b>INFRASTRUCTURE</b>		
77	High density/Impact on local infrastructure	Infrastructure will be augmented where needed to the standards required by utility providers. In most cases the load on infrastructure of the proposed development is less than the former industrial use of the site. The social infrastructure is being augmented by the provision of public open space and other public benefits included in the VPA and Statement of Commitments.
78	The proposed development will add to the already strained infrastructure services in Chippendale.	See comments above. The proposed development will result in less demand on utilities infrastructure when compared with the previous industrial use of the site. In addition the standard of utility infrastructure will be upgraded as part of the proposed development.
<b>SOCIAL</b>		
79	May help with crime as opens area the area	Noted.
80	In favour/proposed park brings needed public space	Noted.

81	In favour of shops, specifically supermarket	Noted.
82	Assurance that near by resident will be protected from noise and damage to homes that may accompany construction process/possible relocation during construction	Noted. This is a construction management issue for the project approval stage.
83	Will aid in providing accommodation to the vast number of students in the area	Noted
84	Overload of community resources	See Comments above.
85	Ensure that residents and businesses affected by construction do not suffer income or living standards during construction	Noted. See Comments above
86	Balfour Street as a cycle/pedestrian street leading over Broadway towards Pymont would have been a great addition to residents	Noted.
87	Park will promote unsocial activity/high density blocks at odds with streetscape and can promote unsocial activity	The Concept plan has been prepared in accordance with CPTED principles. The orientation of buildings to provide for the passive surveillance of parks and the public domain generally will promote safety and security. In addition, the inclusion of active uses at street level will promote activity during a significant proportion of the day. The opening up of the site should also assist in improving the current difficulties with crime and security in the locality.
88	Density compromises long term social welfare and environment of local area.	See comments above
89	The proposed park will not benefit the existing and new population, and object to the park being accepted as a developer contribution. The location of the park is locked away from 80% of Chippendale.	The park will be surrounded by public street and will be readily accessible to all residents of Chippendale. There are a limited number of locations within the site where a park of the dimensions required could be located. The park has been located in what is considered to be the optimum location having regard to solar access, noise, safety for children in particular and equidistance to other parts of Chippendale. As previously mentioned linear park are proposed to invite and draw in pedestrians towards the park.
90	The density of the development and high rise towers could result in 'ghetto'	The density of development is not inconsistent with other

	style mini-suburb.	part of the city centre and inner city areas such as Ultimo Pyrmont. The opening up of the site and integrating the public domain via the street layout and the provision of facilities for the Chippendale neighbourhood will eliminate concern related to either a ghetto or gated development.
91	The offer of an affordable housing contribution is not generous and object to the lack of provision of affordable housing on the site. The proposal does not take into consideration low income earners and is not consistent with the City of Cities Sydney Metropolitan Strategy's aim to provide a mix of housing to address changing demographics.	Noted.  The final mix of housing is for resolution at project application stage. The concept plan application has been prepared on the basis of the CSDCP 1996 required mix.
92	Affordable student accommodation has not been considered. Subsidised student dwellings should be proposed as well as the design of apartments should be flexible to accommodate students. Affordable housing is not proposed on the CUB site and should be taken into consideration.	The detail of apartment accommodation is a detail matter to be considered and resolved at the project application stage. See Comments above.
93	Affordable housing should be provided and not cashed out to provide concentrations of affordable housing in other locations such as Redfern Waterloo.	Noted
94	Linkages to Prince Alfred and Victoria Park have not been included.	Item 4 of the Statement of Commitments includes signalised pedestrian crossings of City Road and Regent Street subject to approval from the RTA.
<b>Technical /Procedural Matters</b>		
95	DOP Matters	
96	The proponents for the development have not conducted a genuine community consultative process.	The proponents for the development have not conducted a genuine community consultative process. The Consultation Overview Report outlines the various consultation processes that have informed the preparation of the Concept plan. These include: <ul style="list-style-type: none"> <li>• The numerous community responses to the 2004 design competition.</li> <li>• Issues noted at a number of Council workshops and consultations that occurred as part of Councils community facilities and open space study.</li> <li>• The Minister's Expert Advisory Panel that had input from</li> </ul>

		<p>a Stakeholder Reference Panel.</p> <p>In addition, two community information sessions were conducted by the proponent during the exhibition period of the Study and Concept Plan Application, one on a week night (15 November) and one on the week end(18 November).</p>
97	<p>The Concept plan proposes a density of 4.36:1 despite the design jury's findings which clearly indicates that such an FSR is inappropriate and compromise design, amenity and sustainable planning.</p> <p>The proposed density of 4.36:1 (FSA) is not sustainable on the grounds of massing, overshadowing and amenity. The EA ignores the findings from independent consultants commissioned by the City</p> <p>The setback for the podium on Broadway is insufficient.</p>	<p>The findings were not ignored. The concept plan application is largely consistent with the preferred scheme selected as a result of the initial competitive design process. A further 2-3 years of design development of the concept plan has been undertaken since the competition. It is understood the EAP considered the jury report and discussions held with the Chair of the design jury as part of the EAPs formulation of its recommendations.</p>
	<b>Other</b>	
98	Great opportunity to provide a large park with active and passive open space as city spreads	Noted
99	Thinking behind is short sighted, lacking in intelligence and creativity/greed More is needed to ensure that what is needed to ensure that what is created is something of excellence.	The concept plan application is largely consistent with the preferred scheme selected as result of the initial competitive design excellence process. In addition, a design excellence process is proposed for the future stages of design development of the site for the project application phase.
100	Supports proposal should adhere to the existing character and density levels of Chippendale	Noted
101	Not opposed to more people living in Chippendale but redevelopment should provide a healthy and sustainable living environment for residents	Noted
102	<p>A concept plan does not allow the reader to examine in detail what is proposed and therefore is not possible to measure the environmental impacts.</p> <p>It is difficult to make a submission without being properly informed as the concept plan fails to consider climate change impacts.</p>	<p>The Concept Plan has assessed the key environmental impacts that can be predicted as a result of the propose development. The Concept Plan does deal with issues in broad terms at an estimated 'worst case' circumstances in that the concept plan provides for the maximum impact of development. Subsequent project applications will provide the opportunity to deal with micro issues in the context of the</p>

		broader of any approved concept scheme.
103	CUB site should of remained under the control of the City of Sydney. The exhibition period should be for 2 months.	Noted.
104	The CUB development is not a valid SSS.	Noted.
105	The community consultation process has been unacceptable by the lack of transparency and backroom discussions with the public misinformed during the process.  The design competition jury report findings have not been adequately considered in the concept plan.	Noted.  See above comments.
	<b>CUMULATIVE</b>	
106	The proposal will set a precedent for new developments in Sydney.	Each application is dealt with on its merits. The Land and Environment Court does not recognise precedent.