

ATTACHMENT D

Response to Council's letter

OUR REF: 09070REZ

8 April 2010

The General Manager,
City of Sydney Council
GPO Box 1591
SYDNEY, NSW 2001

gsa planning

95 paddington street, paddington nsw 2021
ph: 02 9362 3364 fax: 02 9362 3073
email: info@gsaplanning.com.au
www.gsaplanning.com.au
ABN 18 003 667 963

Attention: Mr. Andrew Thomas and Mr. Ryan Van Den Nouwelant

Dear Sirs,

**RE: RESPONSE TO COUNCIL'S LETTER –
GLEBE AFFORDABLE HOUSING PROJECT**

Thank you for the opportunity of meeting with Council Officers on 11 March 2010 to discuss matters raised by Council. These matters were summarised in Council's letter and we are grateful for this opportunity to respond. Accordingly, this letter will identify each of the points contained in Council's letter and provide our response. This letter is accompanied by a set of architectural drawings prepared by Hill Thalys.

1.0 ACCURACY AND CONSISTENCY IN DETAILS

As you might appreciate, the presentation of the Planning Proposal has involved a number of design iterations that occurred up until the lodgment of our submission. These refinements included improvements to the overall design and some slight variation to the numbers.

These variations identified by Council were mainly contained in earlier documentation, which did not reflect the latest proposal that is currently before Council. Although the numbers are indicative and are likely to change again with further detailed design, the dwelling completion now proposed in the concept plans before Council is as follows:

- Social housing 153
- Affordable housing 83
- Market housing 250

We are endeavoring to modify any documentation that is not consistent with these numbers, and we would appreciate it if Council will assume these figures for the purpose of our Planning Proposal.

2.0 APPLICATION PROCESS

We note Council's advice that there is now not a requirement for a subdivision to facilitate multiple height and zoning controls.

Notwithstanding this, it is still proposed to lodge a subdivision application in the near future identifying four (4) distinct allotments. This subdivision is required to create separate titles for the different delivery partners in order to bring debt and equity to their respective developments. The financiers of these delivery partners will require funding security over their respective titles.



3.0 CONTAMINATION

We have received interim audit advice from Environ in respect of the subject site. The advice confirms that a Phase 1 and 2 Environmental Site Assessment (EAS) has been performed and a Draft Remediation Action Plan (RAP) is being finalised. The advice confirms that a further letter will be issued following review and acceptance of the EAS and RAP confirming the opinion of the author, Michael Hayter, that the site can be made suitable for the proposed use. A copy of the letter from Environ is attached (see Annexure A.)

4.0 ENERGY AUSTRALIA SUPPORT

Various discussions have been held with representatives from Energy Australia. On 16 December 2009, Ashwin Prasad, Manager Distribution Operation and Reliability, Energy Australia forwarded the following email:

"EA has no objection to your Planning Submission over EA land. This is subject to your lodgment of a formal application in due course which must be assessed by EA prior to confirmation of any final supply arrangement."

Approaches have been made to Energy Australia for a formal letter. This letter is being prepared and will be forwarded to Council in due course, which is likely to be early next week. A copy of the email is attached to this submission (see Annexure B.)

5.0 LAND USE AND SOCIAL BENEFIT

5.1 How social benefits will be realised

The aim of the Cowper Street Glebe Redevelopment Project is to redevelop 134 public housing units to deliver up to 486 units as a mix of social, affordable and market housing within walking distance of the Sydney central business district. This significant urban renewal project will use an innovative housing delivery model both to create a mixed community which is integrated into the surrounding area and to provide much needed affordable rental housing in this high need area.

The project will use a range of innovative features in order to deliver the affordable and social housing. At the centre of this is a partnership between Housing NSW and two registered community housing providers, one being a not for profit developer.

It is proposed that the social and affordable homes will be developed by an experienced not for profit developer. This organisation, which will also be a registered community housing provider, will then own and manage the affordable housing component, while the social housing component will be owned and managed by another community housing provider.

As well as ensuring the integrated delivery of social and affordable housing on the site, this has several key financial advantages. The cost of project delivery is reduced if a fixed cost building contract is entered into as there is no development margin paid (normally 19% - 21%). These organisations have Public Benevolent Institution status and are therefore not required to pay GST on construction, which reduces costs by approximately 10%. Additionally, tenants housed by community housing providers are entitled to claim Commonwealth Rent Assistance, delivering increased rental return and debt finance capacity.

In addition to using a not for profit developer, this project will incorporate the following innovations:

- Housing design – design testing by Hill Thalys architects has shown that dwelling sizes and provision of parking for affordable and social housing can be reduced while still delivering a

high level of amenity, best practice environmental, urban and architectural design and meeting Australian Standard requirements for adaptable and disabled accessible housing. Adopting reduced unit sizes, internal specifications and parking provision reduces the cost of delivery by approximately 15%.

- Project funding – the project will attract funding contributions from a range of sources. Housing NSW will seek grant funds from the Housing Affordability Fund and the community housing providers will apply for funding under the National Rental Affordability Scheme. Housing NSW will also make a significant contribution to the project through the provision of land and funding. The community housing providers will then use these equity sources to leverage debt finance. In this way the project will benefit from investment by the NSW and Commonwealth Governments as well as the two community housing providers.

Using this innovative approach, the project will provide a mixed residential development comprising:

- 153 social housing units – this will both increase in the number of social housing units on the site and improve the suitability of these units to the needs of existing and future residents;
- 83 affordable housing units – these units will be rented to a mix of very low and moderate income households and will be provided in perpetuity; and
- 250 market housing units – the redevelopment of 15 public housing apartment buildings into a combination of social, affordable and market housing units will rejuvenate the area creating a vibrant, mixed residential and commercial development.

5.2 THE APPROXIMATE NUMBERS OF PROPOSED SOCIAL AND AFFORDABLE DWELLINGS

The proposed development will enhance the capacity of social housing on the site by:

1. Significantly increasing the number of very low and low income households able to be assisted – under the proposed development, the currently 134 social housing units on the site will be replaced with 153 social housing units and a further 83 affordable housing units. This increase of 19 social housing units will be complemented by the fact that a proportion of the affordable housing will be rented to very low and low income households, many of whom would be eligible for social housing. On the basis of experience in NSW, it is expected that around a third of the affordable housing (or 26 units) would be rented to lower income households. This would make a total increase in stock available to lower income households of 45 units.
2. Providing more appropriate housing – analysis conducted by Housing NSW demonstrates that current and future needs in the area for social housing will be dominated by single person households, particularly older people and people with a disability. Existing stock on the site is not well suited for this purpose with nearly half of the current 134 social housing properties being 3 and 4 bedroom units and only one of the 15 apartment buildings on the site having lift access. The proposed development would provide a mix of one bed (80%) and two bed units (20%). In addition all of these units would be adaptable and the majority would either have single level access or access via lifts.

5.3 EXPECTED SOCIAL BENEFITS INCLUDING AN ANALYSIS IN TERMS OF, FOR EXAMPLE, CAPACITY, ACCESSIBILITY, AMENITY AND DWELLING MIX

The development of new social housing on the Cowper Street site will provide a number of social benefits. The first two of these benefits, namely the increased capacity to meet housing need and the ability to provide more appropriate housing assistance, have been discussed at 5.2 above. In addition to these, the following benefits will be achieved:

- Improved amenity – the proposed development will lead to significant improvements in streetscape, dwelling and site amenity in the estate, through the construction of new housing and improved road layouts. It is also expected that market-driven facilities, such as shopping/medical/recreational will be injected into the estate and/or in the adjoining vicinity following the completion of these well designed, environmentally sustainable housing developments. The project consists of blocks with built courtyards, substantial planting, extensive paved areas, lifts, communal entertaining areas, and roof spaces with drying spaces and clothesline. The apartments have balconies, north facing rooms and fencing that separate them from communal areas. The courtyards increase the length of perimeter wall, number of windows, sunlight and air to achieve cross ventilation.
- The creation of a mixed community – The proposed development would provide a mix of housing tenures (50% market housing, 32% social housing and 18% affordable housing). Research has shown that increasing the mix of housing tenures in an area is an outcome which underpins housing-led regeneration programs across Australia. This can result in a whole range of benefits including increased tenant satisfaction, economic participation, educational opportunities and improvements in health outcomes (Australian Housing and Urban Research Institute Research Synthesis Service, March 2009).

The overall social benefit for the entire Glebe estate from the proposed development is measured at almost \$9.3 million per annum. The total return from a present value perspective, over 25 years, is calculated to be \$108.2 million.

Evaluation by Housing NSW of the range of options for estate renewal has found that these benefits could not be achieved by simply renovating, upgrading or extending the existing social housing stock. Upgrading alone would only lead to a social benefit in the low/medium to medium range, while partial redevelopment increases it to medium/high to high. However, redevelopment within the existing planning controls for the site would not provide the optimum yield for the land and the contemplated mix of housing tenures. Furthermore, the relatively low yield would not attract a joint venture partner from the private sector.

5.4 DETAIL OF AFFORDABLE HOUSING, EXPECTED TENANT MIX AND MANAGEMENT

One of the key drivers for the proposed development is the need to increase the supply of affordable rental housing with the City of Sydney. As explained in 5.1 above the delivery of affordable housing will be achieved through the transfer of Housing NSW land to a not for profit developer which will use its own funds mixed with debt finance and grant funding from the NSW and Commonwealth Governments to develop 83 units of affordable rental housing.

A recent study into the supply of low cost rental housing in Australia found that "Among capital cities, Sydney stands out as the least affordable for low-income private renters. Not only does Sydney have a severe shortage of affordable stock (one available stock for every seven low-income households); it also has the worst situation in terms of stock availability (one affordable and available stock for every 15 low-income private renters)". The shortage of low cost stock is evidenced by the very high levels of housing

need in the City where over 80% of all low and moderate income renters are in housing stress (i.e. paying more than 30% of their household income in housing costs) compared with just over 60% in the Sydney Statistical Division.

The affordable rental housing in the proposed development will have the following characteristics. It will be:

- Owned and managed by a not for profit organisation – the organisation will have significant experience in the delivery of affordable rental housing and will be a registered community housing provider. This provides the best opportunity for the development to achieve a high quality built product and a housing project that is both responsive to tenant and community needs as well as being sustainable in the long term.
- Available in perpetuity – Housing NSW has deliberately structured the financial arrangements of this project to ensure that the social and affordable housing are retained for the purpose of assisting low to moderate income households in perpetuity.
- Responsive to a mix of household types – the affordable housing will provide a mix of unit sizes including studios (10%), one bed units (45%), 2 bed units (35%) and 3 bed units (10%). This mix is reflective of the demographics in the City of Sydney where the major household types are lone person households and couples without children. It also provides the flexibility to accommodate a proportion of family housing.
- Provided to a mix of household income groups – as noted in 5.1 above it is expected that around a third of the affordable housing would be rented to lower income households with the remainder accommodating moderate income households.

5.5 POTENTIAL NEGATIVE IMPACT ON NEARBY COMMERCIAL CENTRES

Colliers' International has advised that it is unlikely that the retail component of this proposal would compete directly with the likes of Broadway Shopping Centre and instead would be best suited to servicing the proposed development and immediately surrounding existing development.

5.6 ADDITIONAL CHILDCARE IN THE GLEBE AREA

The Planning Proposal does not provide for additional childcare at this stage. A preliminary assessment identified that there was a reasonable level of childcare in the immediate area. HNSW is prepared to work with Council if it is determined that childcare should be provided within the Planning Proposal.

6.0 BUILDING ENVELOPES AND HEIGHTS

6.1 Urban Design Justification

The HNSW site, currently an aberrant and inwardly focused enclave, is proposed to be reconnected with the broader Glebe / Ultimo area by new streets forming a revitalised public domain. The new street layout will create four (4) new blocks with greatly increased public access and frontage. Development within the blocks is rationally organised, with street defining buildings, differentiated building heights, active and garden frontages, and excellent address.

The site falls approx 5 metres South to North along a ridge between Cowper and Bay Streets, offering a high level of amenity both for sunlight access and district views to the park, harbour, and city beyond. Proximity to many public facilities and to Wentworth Park - the largest public park in the area - grants high amenity to any development of this well-located site.

6.1.1 Height Principles

Building heights are rationally organised across the site with most frontages comprising a variety of heights + street setbacks, and some punctuated by gardens.

Greatest height is given to buildings fronting Wentworth and Bay Streets, reinforcing the corner blocks and context to Ultimo with greater height through thin, flat-floor corner elements. These elements along the northern boundary are limited to 50% of the built frontage along Wentworth Street. The remaining 50% of frontage is comprised of 4.5 storey elements to comprise predominantly of cross-over apartments – set back from the street and punctuated by the Stirling Street reservation.

Bay Street, which edges the site to the east, already has buildings of considerable height along its length. Bay Street functions a local main street, with rich potential as a connecting park-to-park street. Major built elements include the Broadway Shopping Centre, and numerous apartments including the former Grace Brothers Building on the corner of Broadway. In anticipation of greater activity and community focus the concept design fronting Bay Street proposes a street wall of 8 storeys, with minor roof top elements set back from all edges of the envelope, reinforcing the clear alignment of the 20m street reservation typical of Sydney's streets.

Cowper Street, which edges the site to the west, runs from Glebe Point Road to Wentworth Park, and forms the edge to the historic Glebe estate. It has a relatively generous 15m reservation and, like Bay Street, it has an open northward vista to Wentworth Park.

Wentworth Street, which edges the site to the north, is typical of the local streets in the area. This Concept Design proposes to widen the street reservation through a 0.7m dedication to increase its overall width of 13m.

Heights are distributed across the site to address the edge streets and internally address the local extended 13m wide Elger and Stirling Streets. These new streets are in keeping with the typology of the area.

Blocks A1 and B3 are 5 and 4 storeys respectively. This responds to the 22m and 13 m transition of Elger Street East to West. The thin face of A1 addresses Cowper Street, and this built frontage forms part of the articulated street wall to Cowper Street. Of the 135m of frontage to Cowper Street, less than 75% is built, furthermore only 50% to the boundary. The remainder is comprised of a landscaped opening between buildings A1 + A2, and the doubled width of Elger Street reservation and a front garden verge. Higher buildings are confined to the street corner positions.

Built form to Block C reinforces the 22m widening of Elger Street in this position. It boasts the highest point in the site, with maximum solar access and landscape set back within the street reserve. This block is anticipated to house Seniors Living units, adaptable and accessible, for Housing NSW.

The building turns the corner to front Cowper Street on its thin edge, and comprises balcony openings and a high degree of articulation to an already mature landscaped street.

Building C1, to the south of the Elger Street corner makes a clear transition to the context both south and west. It utilises a 3m setback in keeping with the adjoining terrace typology, and is limited to 4 storeys, stepping in height in line with the change in topography.

Building D1 has been designed to allow reasonable sun penetration to recent poorly designed development to the south, fronting Queen Street. The building utilises a 6m separation from its boundary to retain an appropriate landscape setting. Built on a base of 3 storeys, the taller elements

rise to 6 stories and are separated by courtyards to the north providing relief to the street whilst maintaining a street presence.

Building D2, takes its identity in keeping with buildings B2 and B3 fronting Bay Street, as mentioned above.

6.1.2 Setback Principles

Setback principles have been driven by an acknowledgement of several differing contextual positions – Ultimo to the east, Glebe to the West, Broadway to the south, as well as the greater Harbour and City Center to the North. The project aims to build upon the typologies in the areas whilst solidifying the robust capacity of this inner city precinct, and defining clear boundaries for urban capable land, namely Cowper Street. The site makes careful consideration of each:

Glebe to the West

Within direct sight of the project several different building types make up the area in question including predominantly terraced housing, isolated tower elements, and further afield robust detached brick-row housing. The area is of a high cultural significance. With this in mind, blocks A and C have a varied height, articulated scale and gardens which give regular relief to the street.

Wentworth Park to the North

Corner elements in the form of thin flat-floor buildings to Wentworth Street are given emphasis to share the amenity enjoyed by the site. Reinforcing corners is in keeping with contemporary urban design theory and indicates a clear and valued proximity to the considerable park and harbour-lands beyond.

The 8 Storey corner elements are punctuated with voids to 4.5 storey elements comprised of cross-over apartments with a terrace design expression. These elements respond to the topography of the slope on which they sit, and enable cross ventilation and 100% orientation to North. The 4.5 storey heights allow sunlight penetration to the consolidated landscaped courtyards of blocks A and B and ensure solar access to housing to the south through mid-winter.

Ultimo to the East

Ultimo, already having a considerable density is one of the most valued character filled areas of the City of Sydney. The suburb comprised many adaptive reuse elements, former warehouses, new apartments, and mixed use commercial and education facilities.

The site's context, bounded by Wentworth Park Road, Cowper and Bay Streets and Broadway, forms part of this rich and diverse building mix. Varying heights, typology and use are experienced to the east of Cowper Street, making this street a clear bounding element. Bay Street is hence a bisector street and is noted as a 2030 green connection. It has the potential, through built form and mixed use, to be a wonderful main street supporting the community in a more broad manner.

Built form proposed for Bay Street is therefore reinforced and in keeping with a long standing height and density to much of Bay Street. An 8 storey street wall comprising activated ground floors reinforce Bay Street's presence providing clear social amenity. Potential smaller higher elements are set back to ensure the robust and continuous urban character of the street wall.

An extensive analysis of the context has been prepared, first as part of the Sustainable Sydney 2030 project, extended as part of the feasibility report jointly prepared for the City of Sydney and Housing NSW.

6.1.3 Skyline Analysis

Please refer to the Glebe Affordable Housing Demonstration Project Feasibility and Design Report. This report presents Urban Analysis of the local context and character in relation to the Concept scheme and longer-term strategic thinking for the area.

Please also refer to 3 newly submitted perspectives informed by extensive 3D modeling:

- (i) Looking East across Cowper Street: Shows the articulated edge to Cowper Street, extending the view corridor of Phillip Street through the new Elger, as well as proximity to the robust warehouses of Ultimo across Bay and Wattle Streets.
- (ii) Looking North West in Bay Street: Demonstrating the proximity to Wentworth Park and the potential articulated form for activating and reinforcing this park-to-park Street, as highlighted in Sustainable Sydney 2030.
- (iii) High oblique looking south: demonstrating the relationship to varied typology from a bird's eye view. Shows extensive addition to public domain, landscape character, and strategic long term thinking behind the regeneration of this key site.

6.1.4 Streetscape Analysis

Please refer to extended and amended sections and concept elevations. Immediate and general contexts, changes in level, and landscape have been enhanced to provide an understanding of the Concept Design in its broader urban setting.

6.1.5 Overshadowing Principles

The main Building Separation Controls are detailed in Part 1 of the Residential Flat Design Code (RFDC) - (pg 28-29).

The central courtyards have a building separation of 20 metres glass-to-glass, or 16m balcony to balcony. The only departures from these objectives are taller elements fronting Wentworth Street and at the street corners. We note the RFDC Control Checklist indicates a varied response to site and context constraints are available. In this case the thin floor plate elements to the urban corners enjoy multiple aspects with apartments enjoying a greater separation glass to glass through generous balcony spaces.

We note that the RFDC recommends 12 metres separation between 12 metre high buildings, but also allows a reduced distance (in the Control Checklist) when issues such as daylight access, site conditions, urban form, visual and acoustic privacy have been adequately considered. We submit that this is the case in this instance, and therefore that the proposal is acceptable in terms of the RFDC requirements.

We also note that the communal areas of the concept total approximately 23% of the site (not including the private courtyards that immediately adjoin this space). This is very close to the Open Space requirements set out on pp48-49 of the RFDC, which recommend at least between 25 - 30% of the site area (Rules of Thumb). Further, this proposal includes the front gardens to Cowper Street.

The concept design envisages a long-term robust urban solution to a site well suited to medium density housing. Within the site the layout and separation of buildings have been guided by SEPP 65 Residential Flat Design Code separation requirements. A few exceptions to the corners of Wentworth Avenue and Bay Street are noted.

Overshadowing to the South (Queen Street properties)

Most of the terrace houses and warehouses addressing Queen Street are built to the street front that creates a generous rear garden setback. The Shadow Diagrams submitted show that these dwellings and gardens retain reasonable solar access, mostly in the order of 3 hours solar access received in mid winter.

The exception is the recent cluster of low units at the Bay Street end of Queen Street, which has been developed in a less than satisfactory manner. This corner development is poorly oriented, inadequately set back from its rear boundary (in the order of 4m), and overshadows its own footprint. These buildings exist as a poor outcome in a small timeframe in the life of a city, and should not preclude bold and robust urban intervention intended to leave a much more effective and long-lived legacy. The previous Leichhardt controls were more suburban in their intent, whereas this proposal anticipates a more urban condition. The Shadow Diagrams submitted show that these dwellings already perform poorly due to the inadequacies of their own site planning. The proposal does cast additional shadow, and the ground floor units seem to receive limited sun in mid winter. The concept design does consider this difficult interface in detail, proposing:

- a 6 metre wide deep soil landscape setback
- a 3 storey podium to the rear
- discontinuous, taller 6 storey elements set back generally 11 metres from the boundary (excepting the cores)
- providing 9 metre gaps between the discontinuous, taller 6 storey elements
- orienting all living rooms to north, away from this frontage

The combination of the above design responses should mitigate impacts on these neighbouring properties.

A long term vision for the wider area (bounded by Bay and Cowper Streets, and Broadway) should assume a street wall development with adequate rear boundary setbacks similar to the proposed 6m rear setback in the Concept Design / DCP. Such a setback enables consolidated landscape to form enjoyed by the entirety of the block, enabling a green outlook and high amenity for all.

6.2 PRESENTATION TO THE CITY'S DESIGN EXCELLENCE PANEL

The presentation to the Panel was made on Tuesday 30th March 2010, by Philip Thalys and Benjamin Driver, with the Lord Mayor and Council staff present. Paul Hunt from Housing NSW sent his apologies. We await feedback from the Panel.

7.0 DENSITY

7.1 Building Density

The densities proposed are already common in the vicinity, particularly in new developments along Mountain and Wattle Streets. The Glebe Affordable Housing Demonstration Project Feasibility + Design Report showed in detail the proximity to a wide range of urban services, including public transport, parklands and the harbour foreshore, tertiary (3 universities and Sydney Technical College), schools, retail and commercial centres, the Fish Markets, recreational facilities (such as Victoria Park Pool and the Ian Thorpe Centre, community facilities and the like. Almost all are within a 10 minute walk of the site, which is highly relevant due to the limited car ownership of social and affordable housing tenants.

The concept design was also formulated to help deliver the ambitious social and affordable housing targets set out in Sustainable Sydney 2030, which will not be able to be delivered without projects of this type in locations as convenient as this.

Child care facilities could readily be accommodated in the non-residential areas already proposed along the Bay Street frontage.

8.0 TRAFFIC AND PARKING

In response to the matters raised by Council, a further Traffic and Parking Report was prepared by ARUP. The report does not survey the individual housing on the subject site as this is beyond the scope of their brief at this point in time. However, they have provided an analysis of the journey to work data for residents in the Glebe area from the 2006 ABS figures. A summary of the modal split included in the ARUP Report is included below.

Table 1: 2006 Census Data Journey to Work Data for Residents of Glebe

Mode	Persons	%
Train	74	1.5
Bus	1,082	22.2
Light Rail	64	1.3
Combined mode, at least one public transport	364	7.5
Taxi	73	1.5
Car, as driver	1,537	31.5
Car, as passenger	192	3.9
Bike	129	2.6
Walk only	886	18.2
Other modes	100	2.0
Worked at home	279	5.7
Not stated	100	2.0
Total	4,880	100

Also, the report deals with the public transport routes in the locality, including existing light rail, and identifies potential traffic diversion measures for the site. The report also contains an assessment of the traffic impact on the road network and provides car ownership comparisons for Glebe, Forest Lodge and Sydney. The ARUP Traffic and Parking Report concludes, inter alia:

"The current subject development is appropriate:

- Due to the convenient location of the site with easy walking to shopping/ dining and most importantly, availability of alternative modes of transport close to future residents, it is considered that the demand for car parking is likely to be very low. Therefore, low parking provision is considered in accordance with State Government and CoS policy to reduce vehicle kilometres travelled (VKT) and reduce green house gas emissions.*
- Glebe Affordable Housing has been identified as one of the 10 major project ideas in the CoS 'Sustainable Sydney 2030' vision. The CoS vision also targets to achieve 80% of city workers commuting on public*

transport and 80% of work trips by city residents in non private vehicles. The reduced parking provision for the development will align with this philosophy.

- *Traffic generated by the proposed development will be modest. The traffic impact on the major and local roads may be determined in the detailed traffic impact assessment if required for this development.*
- *A slow and safe traffic environment should be created in the internal road system favouring pedestrians. Therefore, a 40km/h speed limit should be designated in for the internal site road network. Appropriate Local Area Traffic Management (LATM) control devices should also be installed to further discourage potential 'rat runs', thus maximising local traffic and pedestrian safety."*

A fully copy of the Traffic Report is attached to this submission (see Annexure C).

9.0 PROPOSED PLANNING INSTRUMENTS

In this section Council identifies the provisions that might be included in the Draft Local Environmental Plan (LEP) and Draft Development Control Plan (DCP). He agreed that these matters could generally be included in the planning documents. However, at our meeting it was agreed that Council would be preparing the final Draft LEP and DCP and that we did not need to have any further input into these documents at this stage.

10.0 FUTURE DEVELOPMENT APPLICATIONS

10.1 Consistent Controls

We note and support that Council is pursuing an LGA wide approach to consistent controls. We would also suggest that it is important to acknowledge that the HNSW proposal is consistent with the Council and State Government approach to provide essential affordable housing in close proximity to services and infrastructure.

10.2 Subdivision

We acknowledge the Council's comments and concerns about Stirling Street and the pedestrian connection through private residences. Currently this land is owned by HNSW and we are pleased to discuss future ownership and pedestrian access provisions as the Planning Proposal proceeds. However, we also note Council's comments in respect of Philip Park, which is to provide open space for future residents. Details relating to open space contributions, planning agreements and eventual ownership of the open space, are matters for further discussion and resolution. We are also conscious that road reserve boundaries will need to be considered in conjunction with the proposed subdivision.

10.3 Road Reserves

We note Council's requirements for minimum width for road carriageways, soft verges and footpaths and the desire for having splayed corners at intersections. We are pleased to consider these minimum width requirements as the design receives further refinement at subsequent stages. Accordingly, we are more than pleased to have further meetings with Geoff Bradley, the Sydney City's Manager of Public Domain Property, to begin steps to enable the closure of roads and the transfer of title as may be required. Preliminary dialogue between Geoff Bradley and Paul Hunt from HNSW has already occurred.

10.4 Building Design

10.4.1 Diversity of Dwelling Mix

The 3 varying types of housing within the concept have driven the mix of housing on the site:

- **Social Housing**, to Housing NSW requirements. Requiring a prescriptive mix tailored to the requirements of present and future tenants, anticipated to be a majority of accessible Seniors Housing. It is proposed that 80% of the apartments in this housing segment would be single bedroom, with the remainder as 2 bedroom. All are designed to HNSW's Universal Access principles. This new stock should complement HNSW's extensive existing stock in Glebe, which includes many heritage listed terrace houses.

Blocks C2 and D1 are comprised of flat floor apartments in the concept design to comply with the Seniors Living SEPP for accessibility and adaptability. These buildings are hence slightly deeper (16-18m including open galleries) to allow for access provisions. They are situated on the highest points in the site, and enjoy prospect and solar access to the north.

C2 fronts Elger Street along its entire boundary, taking advantage of the widened 22m reservation and offset landscaping accommodated within this. In contrast, block D1 fronts Elger Street in a 13m reservation, and is developed with communal courtyards providing relief and allowing greater solar access to north for apartments set back from the street.

- **Affordable Housing**, based in the concept design on Affordable Housing standards supplied by actual providers. The design was also informed by historic research into unit size and mix of affordable housing within the City of Sydney. This research challenges the typical size of apartments currently common to the market. The concept design aims to maintain high amenity whilst making affordable housing apartments robust to be both efficient and cost effective to build, maintain, rent, and/or sell (dependent on the nature of the provider in the future).

Affordable Housing buildings identified in blocks C1, A3, and B3 feature 15-16m deep flat floor apartment types in a varied mix promoting a high level of cross ventilation and orientation to north. Communal roof gardens and direct frontage to courtyards form part of the concept for the affordable housing components. The Affordable component includes 1, 2 and 3 bedroom apartments, including some with private gardens, some with roof terraces.

Reference is made to the City's *DRAFT Affordable Rental Housing Strategy 2009-2014* – Objective 3:

- 3. *Encourage a diverse housing stock*
 - *Review appropriate dwelling size mix*
 - *Ensure planning supports culturally appropriate housing*
 - *Review planning provisions for secondary dwellings*

The chosen mix is for concept purposes, to be revised at DA, but nonetheless is informed through thorough investigation specifically tailored to this Affordable Housing Demonstration Project, and as such, challenges and reviews where appropriate in order to inform and test the best model for future developments.

- **Market Housing**, comprised of blocks A1, A2, B1, B2, and D2 form a crust to the site along the Wentworth Street (northern) and Bay Street (eastern) boundaries. Built form is designed to reinforce these important local and the major corner elements which contain the site, and are comprised of Flat floor corner elements allowing maximum corner ventilations and multiple aspect, as well as cross-over and associated dwellings to north. The Market component includes 1, 2 and 3 bedroom apartments, including some with private gardens, some with roof terraces. Flat floor, cross over and maisonette types are proposed to diversify housing choices.

The project is Conceptual only, and as such requires further design resolution at DA stage. The high degree of plan-based resolution should be noted, beyond the requirements of concept, but required for external Housing NSW costing and other considerations.

Mix was determined by market consultation specific to the site to gain an understanding of the demographic of both Market and Affordable owners and tenants. See Colliers Final Report, commissioned by Council, July 2008, as part of the original application.

The mix has been maintained through the amended concept for clarity and consistency, but this does not preclude the adaptation of the mix at the time of DA lodgment should the updated market reporting or Council Requirements change.

10.4.2 Residential Flat Design Code and SEPP No. 65

Please refer to statement 6.1.5 of this document. We also note Amended Concept Plans resubmitted with this addendum. The development exceeds many SEPP 65 / RFDC recommendations, including those noted in Council comments:

- More than 80% of dwellings are corner or cross-ventilated – also taking into consideration the high proportion of 1-bedroom apartments required under the Housing NSW brief.
- Where single orientation occurs, only 1% of total concept dwellings are single orientation to south or a variation of. This achievement far exceeds the recommendations of 10% in the RFDC, and clearly contributes to the 44% BASIX reduction achieved through passive design alone (Kinesis, 2008).
- 12m separations are generally achieved throughout the concept design and in most instances exceeded. Where 13m occurs along Stirling Street to 8 storey elements, the forms allow living spaces open to north, not in proximity to nearby form. These flat floor elements are thin, approx 15-16m, and allow exceptional corner and cross-ventilation.
- Dwelling sizes for market housing reinforce those recommended by SEPP 65 / RFDC. Apartment sizes for affordable dwelling achieves exceptional amenity whilst challenging the current trend to larger dwellings. This directly addresses the housing stock and affordability crisis and demonstrates the ability to maintain high quality living standards through efficient design, resulting in yield, cost, and build-ability advantages.

10.4.3 Active Street Frontage

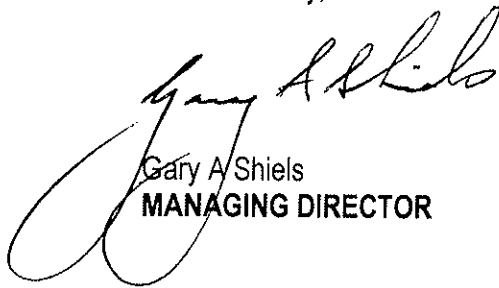
Flooding constraints, as highlighted by Council's risk assessment team on numerous occasions challenges ground floor address to Bay Street. The 1.2m freeboard built in to the Concept Design is subject to confirmation through further design stages and Council. Whilst no freeboard would be preferred the Concept design takes account of this possibility and attempts to integrate with the street frontage if this in fact becomes a necessary part of the development. Any setbacks to active frontage attempt to integrate access. The impact of walled elements have been minimized by the introduction of stairs forward of column elements.

10.4.4 Buildings turning the corner

Whilst the concept design has attempted to articulate the street frontages, any final design, built form, articulation, or material selection will be subject to multiple Development Applications by separate Developers/Housing provider proponents. In principle the notion of articulation to the side faces of buildings fronting a heritage precinct to the west is considered to be desirable. Please refer to submitted Elevations and Perspectives.

Thank you for the opportunity of providing this submission and we look forward to working with Council to bring this exciting Planning Proposal to fruition. Should you require any further information, please do not hesitate to contact us.

Yours faithfully,



Gary A Shiels
MANAGING DIRECTOR