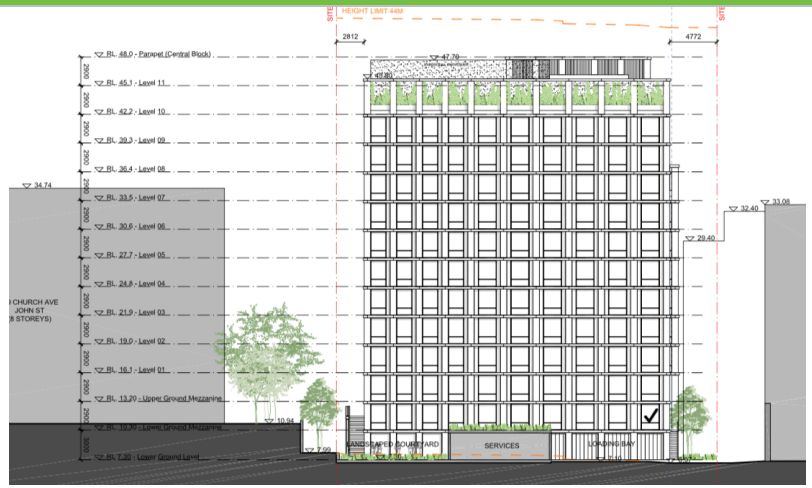
Subject	Submission Comment	Applicant Response
Use and Permissibility	Building student accommodation in this area that houses families, couples and commercial businesses is not viable, nor is it justifiable.	The subject site is zoned B4 Mixed Use under the BBLEP2013. The proposed use is best defined as a 'boarding house', under the BBLEP 2013. This use is permitted with consent in Zone B4 Mixed Use. The development is consistent with the zoning objectives by contributing to the mixture of compatible land uses in the area and including residential student accommodation that encourages sustainable modes of transportation such as walking and cycling. The proposed student accommodation will also assist in stimulating the local economy both during construction as well as through the students who will reside at the boarding house. The developer, Iglu, is a renowned student accommodation provider and has a strong reputation for delivering high-quality designed developments that cater to tertiary student populations throughout Australia. Iglu's primary focus is to provide thoughtfully planned, safe, student accommodation buildings that respond appropriately to their respective environments and are built in locations with easy access to public transport, essential services and areas of amenity and enjoyment. Every student residing at Iglu Mascot will be provided with property specific House Rules. Refer to the revised Operational Plan of Management in ***Attachment 12***, Acoustic Report in ***Attachment 7*** and Green Travel Plan in ***Attachment 8*** which have been updated submitted as part of this response.
	A student accommodation is not suitable for this area.	
	There is no necessity to build Student Housing in this area, since the closest university (Sydney University) from the above address is 65 min walk or 37 minutes by public transport. No other major university (UNSW) is 70-minute walk or 40 minutes by public transport. There is no other TAFE or Colleges within walking distance from the vicinity.	
	The size of the land is not suitable for high rise building.	
	The development of student accommodation is not in line with the current developments in the area.	
	There are many childcare centres within the Mascot precinct in close proximity to the proposed development and parents would feel extremely uncomfortable and worried if the proposal is approved as "Student" housing is known to be linked to drugs, alcohol and/or antisocial behaviour. This could increase crime rates in the area and lead to families leaving the area.	
	There is a Childcare centre directly across the road from the development in Church Ave and this could be a concern in regard to child safety (as there is no guarantee that the so-called students occupying the student rooms are in fact 'students'. What guarantee would the residents in the surrounding area be given that this development does not become a boarding house or cheap accommodation for the homeless, ex-prisoners and other undesirable people that should NOT be located near our vulnerable children and elderly citizen.	
Cleanliness	As a student accommodation building it would result in garbage being left on the street and curb side by constant incoming and goings of students in their accommodation.	An updated *Operational Management Plan* (***Attachment 12***) has been provided by Iglu and provides details relating to the day to day operational aspects of the development. It provides details relating to the access and security, utilities, cleaning, waste and recycling, maintenance and repairs, fire safety, emergency
	The cleanliness of John Street and Church Avenue will be negatively impacted. They will have no regard for surrounding property as they	

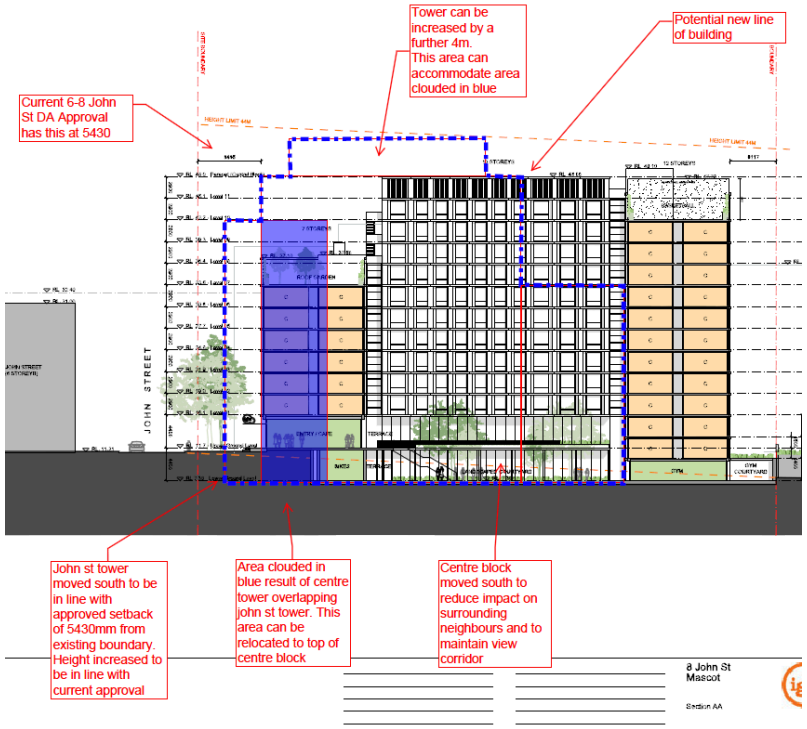
Subject	Submission Comment	Applicant Response
	are all students. There should be an extra run of street cleaning, funded by this operator to mitigate the above impact – nothing currently mentioned in the Waste Management Plan submitted to Council.	procedures, incident report and complaints procedures, and property rules and staffing. It also outlines clear and suitable operational measures and practices for the ongoing management of the facility, which will minimise any adverse impacts associated with the development on any adjoining properties in the vicinity. It is considered that the OMP is consistent with the principles established in *Renaldo Plus 3 Pty Limited v Hurstville City Council [2005] NSWLEC 315* (and as amended by NSWLEC 1247). Iglu will employ or assign the services of a Facilities Manager and/or an Assistant Facilities Manager and cleaning contractors, who are responsible for the general upkeep of all building services and facilities. Refer to the revised Operational Management Plan in ***Attachment 12*** for detailed discussion.
	The upkeep, cleanliness of Church Ave and John St will be a huge problem as temporary residents such as students will have no regard for the student property or the surrounding area.	
	Mascot station area has already become a 'party central area' with all hotels and serviced apartments that are in this area. Guests abuse our area by treating it with disrespect, leaving rubbish, destroying property, creating havoc, yelling and screaming at all hours of the night and have no regards nor respect to the people that live here and adding students to this mix is a recipe for disaster.	
Residential Density	Before dumping close to 2000 extra people into such a small site and already overcrowded area, all levels of government must stop the blaming game and provide the infrastructure to accommodate these new residents. They need public transport, green open areas and well thought plans that focus on quality of life and not revenue making.	The proposed development will accommodate only 435 persons, not 2000. A Revised Green Travel Plan (***Attachment 8***) has been prepared. This report concludes that *"This GTP notes a number of transport demand management initiatives to assist with achieving a 0 per cent target car driver mode share for this proposed student accommodation.* *In addition, the proposed development does not include any on-site car parking provisions as is typical of student housing developments and other Iglu sites. Iglu currently operate several student housing facilities and over 3,000 beds, in Sydney, Melbourne and Brisbane which have no car parking provisions. Iglu operate with a philosophy that encourages staff and students to use sustainable transport modes (i.e. public transport, cycling and walking) and has successfully operated with no complaints from students on the lack of parking provision or from Councils about students driving and parking off-site.* *The implementation of this GTP, in combination with no on-site car parking provisions, will be key to ensuring that students and staff are encouraged to use sustainable transport.".* Refer to the Green Travel Plan for detailed discussion.

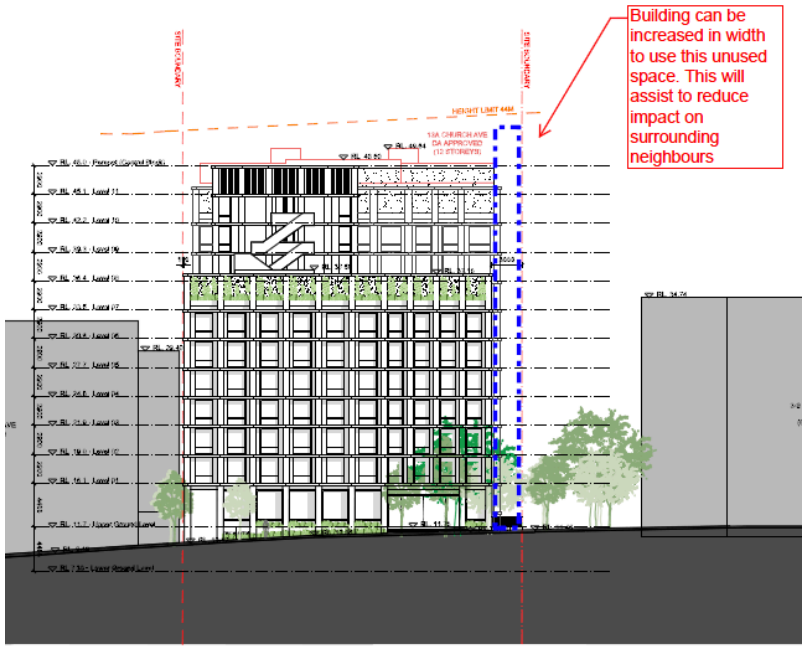
Subject	Submission Comment	Applicant Response
	The proposal will house 435 bedrooms – this could consist of double or even triple the number of students living at the premises due to unapproved room sharing (owners would not be made (*aware*) of this), there is a strong possibility of up to 1000 students could be living at the premises.	The *Operational Management Plan* in ***Attachment 13*** outlines the operational procedures and processes for the development. The Plan will be enforced by Iglu's General Manager who will be responsible for the running of Iglu Mascot and will be supported by a team of Iglu Property Management staff members. Access to the property will be possible via the main entry foyer adjacent to John Street and will be restricted via an electronically coded swipe card provided only to current in-house residents and staff. Each student residing at Iglu will receive a swipe card programmed specifically for zoned access, namely the main foyer door, lift access to their floor, access to their studio unit or 6 bedroom share unit (and access to their room). Students will not be able to access any other 6 bedroom share unit or studio unit that they do not occupy. The electronic card system will allow Property Management to review and read every lock throughout the building and the cards that have accessed that point. For additional security, CCTV will be installed to monitor all external access points, lifts and public areas within the property. All external access points will have reed switches and are alarmed and linked to a 24-hour monitoring company which will call the duty manager if left open for an extended time. A duress button will also be installed within the reception/administration office that will be linked up to a 24-hour monitoring company in case of emergency. Outside of office hours, there will be Resident Leaders living onsite that are available to support students with administrative or pastoral care issues. Resident Leaders will be employed and trained by Iglu to act as duty managers outside of office hours. Security Guards will patrol the perimeter of the building as dictated by site specific neighbouring establishments and events. Iglu will ensure strong relationships are established with adjoining neighbours in relation to security management.
	Student Housing has been known to include bedroom cluster arrangements which would include having extra people living in the same room. Therefore, leading to more people living there.	

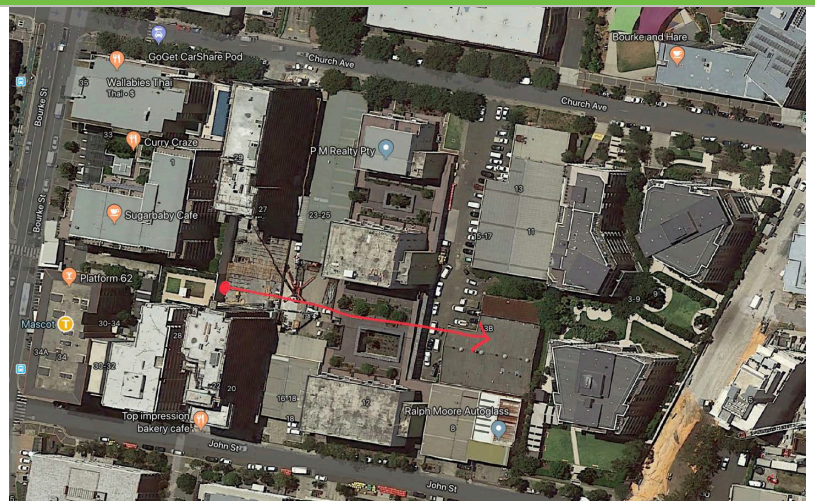
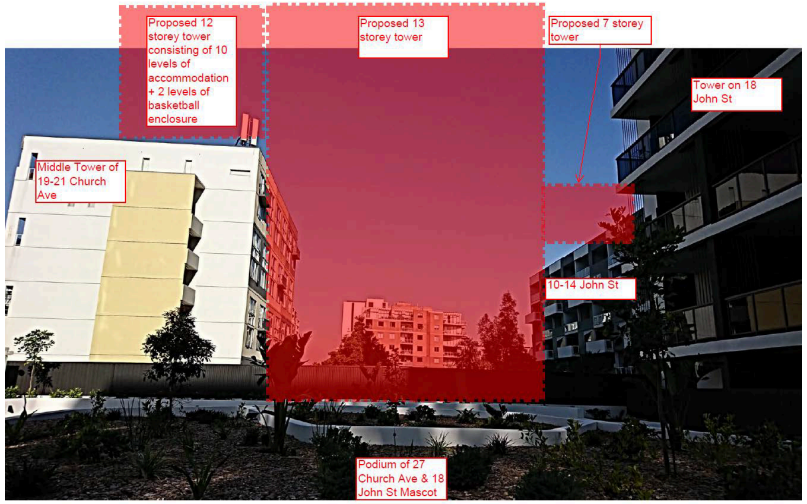
Subject	Submission Comment	Applicant Response
	The 12 - storey building proposal of 435 bedrooms (213 studios and 222 of 6 bedrooms), adds an additional of 1,545 residents into the proximity where the current transformation and infrastructure are already stressed and unable to cope with the additional influx.	In total, the proposed development accommodates 435 beds. Of the 435 beds; • 213 are studio style rooms; and • 222 beds provided in 37 x 6-bedroom cluster unit style units. The development will permit one (1) resident per bed resulting in 435 residents. Each student residing at Iglu will receive a swipe card programmed specifically to restrict or limit access as required and will allow Property Management to review and read every lock throughout the building and the cards that have accessed that point. These swipe cards cannot be duplicated. CCTV will also be installed to monitor all external access points, lifts and public areas within the property.
Design and Built Form	The arguably lacking design and aesthetics for such a massive imposing building on a relatively small site.	The application included an Architectural Design Report which details the carefully designed and selected materials for the development. The colour is integral to the design with a combination of a lighter pigmented pre-cast concrete grid and a darker full-bodied metal recessed infill resulting in tonal composition that celebrates the qualities of the materials and creates depth and texture across the facade. Each building has its own distinctive, yet complementary colour, simultaneously providing unity and differentiation to a collection of building. Further, the proposed colour variation will add design interest and articulation, whilst also adding depth and texture to the building façade. It will also highlight the modular design of the rooms which wrap around the built form. The proportion of concrete to glass displays a balance between privacy and outlook. The propsoed height and varied infill provides the buildings with a clear tripartite expression of base middle and crown. A 250mm high horizontal slab projects 350mm beyond the glass line, providing horizontal shading and depth, while the wider 650mm vertical pier is setback 100mm from the face of the horizontal.
	The proposal is for a large rectangular block like structure with little or no building articulation. The façade treatment proposes large areas of glass along a single plane without any projections such as balconies or awnings. This creates an inefficient thermally designed building. It does not allow for sun shading to the rooms during the warmer months. This will place great strain on the local power network.	
	The northern elevation at the 6m setback features 110 windows in a "grid" pattern with no articulation or relief. This elevation is unimaginative in its execution as shown below.	

Subject	Submission Comment	Applicant Response
	 There is opportunity for this elevation to be greatly improved so that it has a better relationship to other sites in terms of its presentation and built form.	Within the concrete grid is a large square format awning window that provides each habitable room with generous outlook, natural light and ventilation. Balconies have been purposely excluded from the room design as a matter of safety and consideration of noise and privacy to the adjoining neighbours. Communal balconies are provided on the lower levels within the central courtyard area and will not overlook adjoining neighbours.

Subject	Submission Comment	Applicant Response
	The design and colour etc should be improved. Given the passive imposing structure that it is and the fact that it wipes out views of the site, sky, greenery for many, it should be required to make the area somewhat better not worse. There appears to be minimal design flair despite Iglu's other developments. The colours are dark, old office building like with minimal aesthetics.	The colour scheme is integral to the design and applied to both the grid and infill. Over the years, Mascot has undergone significant change from a low density residential and light industrial area to increased higher density living. The proposal proposes the use of colour as a way of celebrating the history of the suburb. Three colours are used on each wing and derived from an abstraction of the terracotta roof tiles typical of the older houses in the suburb, found nearby east of O'Riordan Street, as well as the original brick warehouses on the site whilst also providing each building with its own distinctive yet complementary colour, simultaneously providing unity and differentiation to a collection of buildings. The three colours combine as a set to create a tonal composition that blends into the context, yet also individually to create a sense of personality to each wing, reading as a family of buildings. The development significantly improves the amount of landscaping on site compared to the existing rate on site. The development proposes 360m^2 of deep soil landscaping throughout the sunken courtyard and front elevation, 720m^2 located on the rooftop garden outdoor communal space which includes additional planting and furnishing and integrated elevated planters throughout the design. The plantings will include a central green turfed lawn and courtyard forest which include a canopy of mature trees. The selection of plant species has been chosen to reflect the native and historic vegetation within the Mascot area whilst introducing a selection of exotic species that deliver diversity and vibrancy to the colour palette.
Height and Scale	The Applicant has an opportunity to take advantage of the current approval which worked through all the impacts as noted earlier in this document. For example • There is a difference of approximate 3000mm between the approved setback and proposed setback, by simply moving the proposed design to be 5430mm from existing John St boundary it starts to open and preserve the view corridor.	The proposed development includes a setback of 8.5m to the southern boundary (John Street) which aligns with the street wall of the adjoining building. The northern building has been setback 6.19m from the boundary. The Approved Section 4.55 footprint to DA 13A Church Ave has been reflected in the architectural plans. In the Meeting with Council on Tuesday 10 March 2020, Council deemed the setbacks as sufficient on the northern elevation of our

Subject	Submission Comment	Applicant Response
	• The permissible height limit is 44m, therefore increasing the height to the John St tower from 7 stories to part 10 (as approved and in line with streetscape) and part 13 to 44m allows mass from the rear and central tower being relocated to the John St tower; this will significantly improve the design, resulting in significantly less impacts to adjoining neighbours • Please refer to below images 'marked up drawing DA08-001 & DA07-001 section AA' which illustrates the benefits of the above suggestions  	development, particularly as there is some offset between our buildings and the proposed building at 13A Church Avenue. Further, the northern elevation retains significant articulation and colour consistent with the rest of the building which wraps around to the northern elevation. Refer to the proposed colour scheme materials schedule sheet in DA11.000 north block and north block façade perspective on DA10.001 in the original DA submission package. The amended Architectural Plans include the lowering of north core by x1 storey (L10 is last storey served by lifts, access to roof plant via service hatch from L10 north core). Further, the proposal includes the removal of roof at top of L11 central block. The façade and screening have been retained so no visual impact will result. These amendments result in an improved development outcome in terms of views and amenity to and from the proposed development. Refer to the Architectural Plans in ***Attachment 1*** and the Detailed response to RFI prepared by Mecone for further information.

Subject	Submission Comment	Applicant Response
		
Height and Scale	The proposed 3 tower design is out of proportion to adjoining buildings, to illustrate this please refer to the below 2 images; • 1st image relates to the location from where a photo was taken • 2nd image relates to the view one would see from this location	The proposal has been carefully designed to appropriately respond to the surrounding area, through the incorporation of appropriate materials, massing, setbacks, horizontal and vertical articulation which corresponds to the character of the development in the surrounds. The development proposes the construction of an architecturally designed student accommodation building (boarding house), ranging from 7 to 12 storeys and containing 435 beds. The proposed development parapet stands at 40m which complies with the maximum height control of 44m under the BBLEP2013. Further, the proposed development is consistent with the bulk and scale of neighbouring existing and approved developments and is

Subject	Submission Comment	Applicant Response
	  As can be seen in the above image, the areas filled in red are the approximate locations of the proposed 3 towers, clearly out of proportion to surroundings.	consistent with existing street wall buildings on the northern side of John Street and within the vicinity of the subject site. The surrounding area is characterised by a mix of uses including residential developments. John Street exhibits a street wall height of 6-8 storeys comprising of residential development and Church Avenue exhibits scales of development ranging from 6-13 storeys. An 8-storey residential flat building is located directly to the east. Immediately beyond is a linear park which extends up to Gardeners Road. The northern boundary is shared with an existing 1-2 storey industrial building.

Subject	Submission Comment	Applicant Response
	The 12 storey proposed development will obscure the view of all nearby buildings. I suggest that the development is limited to a more reasonable maximum height of 4 storeys.	The maximum height of buildings at the site is 44m, in accordance with the BBLEP2013, applies to the site. With a proposed height of 40m, all of the proposed built form is contained within the maximum height control of the BBLEP2013. The proposed development is consistent with the bulk and scale of neighbouring existing and approved developments.
	The size and excess of the building is not in keeping with the existing Mascot Station Precinct Master Plan or any of the existing buildings. The building being 12 or more storeys is out of step with the buildings either side and across the road. It also exhausts the site completely.	The proposal comprises a part 7 to part 12 storey student accommodation development, which will provide a high-quality architecturally designed building at the subject site. This design responds appropriately to the surrounding area, through the incorporation of appropriate materials, massing, setbacks, horizontal and vertical articulation which corresponds to the character of the development in the surrounds. The three (3) rectangular building blocks, collectively forming a 'c' shape, exhibit a clearly defined base, middle and top. The built form has been carefully designed to effectively hide the bulk of the development behind the continued street wall height whilst ensuring consistency in scale with the 6 to 8 storey buildings along John Street. The BBLEP2013 permits a maximum height of buildings 44m on the site. The parapet of the proposed development stands at 40m with all of the proposed built form contained within the maximum height control and consistent with the bulk and scale of neighbouring existing and approved developments. The BBLEP2013 also permits a maximum Floor Space Ratio (FSR) control of 3.2:1 over the subject. Pursuant to Clause 29 of the State Environmental Planning Policy Affordable Rental Housing (SEPP ARH 2009) an additional FSR is permitted for the development of the site equivalent to 20% of the FSR (as the existing FSR is 2.5:1 or greater) of the portion of the proposal that is for the purposes of a boarding house. Therefore, the site is subject to a maximum FSR of 3.84:1. The development proposes an FSR 3.67:1 and is compliant under the provisions of the SEPP (ARH) 2009 and does not completely exhaust the site.

Subject	Submission Comment	Applicant Response
		Furthermore, the proposed FSR is less than recent approvals in close proximity to the site which have development consent granted for project with FSRs around 3.9:1.
	I object to the height of this complex, I reside next door at 3-9 Church Avenue, we as an executive committee have recently installed solar panels.	With a proposed height of 40m, the development is compliant with the BBLEP2013 height control of 44m. The proposed development has been carefully designed with apartments orientated for maximum solar benefit and visual amenity, while minimising the impact on solar access and visual privacy of neighbouring properties. Additional solar and overshadowing studies have been prepared in alignment with the comments and examples provided by Council. Elevation shadow diagrams of the northern elevation of the subject building have also been provided in ***Attachment 3***. These additional detailed solar diagrams analyse the impact of overshadowing onto the communal open space within the subject site, and the private and communal open space areas of the adjoining residential unit development located towards the east and west of the subject. Additional surveys were also taken of the façade of the building across from the site on the southern side of John Street, with the solar plans amended to illustrate the windows of any neighbouring buildings that may be affected by overshadowing from 9am to 3pm during the Winter Solstice. A table has also been prepared by Bates Smart which identifies the number of hours of sunlight and solar access is received by each neighbouring apartment affected by overshadowing. Refer to ***Attachment 3*** for additional information. Updated and more detailed Solar Access and Shadow studies and view analysis have been undertaken by Bates Smart Architect and are attached in ***Attachment 1*** and ***Attachment 3***. View Loss analysis studies have also been prepared in ***Attachment 2.***
	The fact the building will tower over existing buildings significantly and obstruct access to sunlight, views etc It also appears built up to every border of the site.	
	The new building project will be 12 - storey (435 bedroom student accommodation), it has the possibility to overshadow the ground floor apartments located on 7-9 John Street. The new building is much taller than our building and therefore blocks the sun from it.	
Setbacks	Existing pedestrian pathway are not wide enough to accommodate more than 1000 extra people generated by combination of this development and new upcoming development near this building (DA2019/359). Some of the pedestrian pathways currently too narrow	A revised *Green Travel Plan* has been prepared by TTPP. Refer to ***Attachment 9*** for detailed discussion. An updated *Traffic and*

Subject	Submission Comment	Applicant Response
	due to combination of existing industrial use (pedestrian path on southern boundary of Equinix Data Centre SY1, 639 Gardeners Rd) and currently insufficient building setback on development application DA2019/359. The current traffic management plan submitted to the Council failed to account any of this into consideration.	*Parking Assessment Report* has also been prepared in ***Attachment 9.***
	The subject DA proposes a zero rear setback to the northern boundary abutting 13A Church Avenue. As a result of this setback, the loading dock is situated on the common boundary as shown below. As shown on the upper ground mezzanine plan, the loading bay is open. Concern is raised as to noise from the loading bay impacting on the commercial open space of 13A Church Ave. This interface with the land to the north is unsatisfactory. Any development of 13A Church Ave would locate communal open space to the rear. That function should be replicated across the rear of the subject land. In its current form, the subject proposal forces the development of 13A Church Ave to deal with the amenity impacts of the subject proposal. Above the lower ground floor, the proposal maintains a 6m setback to the rear boundary for 11 storeys and a basketball court as shown below.  The setback between the building and the rear boundary is inappropriate and we should defer to the minimum separation distances from buildings to side and rear boundaries under the	An updated acoustic report has been prepared and is in ***Attachment 8.*** Council accepted the location of the loading dock in the meeting on Tuesday 10 March 2020. The revised architectural plans have also included the provision of a covered external holding bay for loading/unloading of goods and to provide protection for workers. As advised in the updated Acoustic Report in Error! Reference source not found., the loading dock shall only operate between the following hours; • 7am – 10pm Monday to Saturday, or • 8am to 10pm Sunday or public holidays. Trucks within the loading dock shall ensure that engines and refrigeration units are turned-off while located within the dock area apart from when entering and departing the dock area. Refer to the updated *Traffic and Parking Assessment Report* in ***Attachment 9*** which includes a swept path analysis for the access of MRV trucks on site. The rear setback to the northern boundary has been informed by ensuring a suitable separation distance between the built form on the subject site and the approved built form on the adjoining site to the north. A separation distance of 22.5m has been provided, which is reflective of a suitable building separation distance Apartment Design Guide (ADG) for apartments above 9 storeys in height. It is acknowledged that the Apartment Design Guide does not apply to boarding house/student housing development, however the ADG distances have been considered to demonstrate a suitable amount of amenity is provided between developments. Refer to the *Architectural Plans* in ***Appendix 1*** for details.

<table>
<tr><th>Subject</th><th>Submission Comment</th><th>Applicant Response</th></tr>
<tr><td></td><td>Apartment Design Guide which sets out meaningful setbacks to ensure privacy and separation between built forms.

<table><tr><th>Building Height</th><th>Habitable rooms and balconies</th><th>Non-habitable rooms</th></tr><tr><td>Up to 12m (4 storeys)</td><td>6m</td><td>3m</td></tr><tr><td>Up to 25m (5-8 storeys)</td><td>9m</td><td>4.5m</td></tr><tr><td>Over 25m (9+ storeys)</td><td>12m</td><td>6m</td></tr></table>
The above setbacks, when combined with setbacks on adjoining development, would result in a separation of 24m between buildings at and above 9 storeys.

A 6m setback to the rear of the building does not result in a built form that responds to the character of high-density residential buildings taking place in the neighbourhood. The above setbacks to the boundary should be implemented.

In the event that the development approved for 13A Church Avenue does not proceed, any alternative scheme on that site would be required to adopt a larger setback to meet the building separation provisions of the Apartment Design Guide, particularly for levels above 4 storeys.

This issue was highlighted by Council's UDRP in its minutes of 1 August 2019 and has not been resolved by the current development proposal.</td><td></td></tr>
<tr><td>Cross Flow Ventilation</td><td>Out of the 435 units proposed, the majority do not provide any natural cross flow ventilation.

The proposed CGI's indicate an awning type window system, which is usually not sufficient for cooling of rooms.</td><td>The development has been designed to create spatial separation between the buildings and is consistent with the bulk and scale of the buildings in the surrounds. This spatial separation also supports natural ventilation, solar access, and visual and acoustic privacy buffers to neighbouring developments. The lobby's act as glazed building breaks to the buildings form and provide ample natural light ventilation, reducing the dependency on artificial light and mechanical ventilation. Refer to the updated Acoustic Report in Attachment 7 for details.

The typical studio has been carefully designed to maximise amenity and efficiency. Awning windows provide natural ventilation.</td></tr>
</table>

Subject	Submission Comment	Applicant Response
		The typical communal living area provides a shared kitchen, exhaust ventilation, drawers/cupboard for food storage for each person, a dining table, and a lounge and TV area. All living areas are located on building corners to maximise views, cross-ventilation, solar access. The building is well insulated and designed to integrate passive design measures including good access to natural light, sun-shading and natural cross ventilation. It maximises operable windows through the use of large format awning windows improves ventilation which helps to reduce reliance on mechanical cooling. Cross ventilation is introduced through the introduction of open naturally ventilated corridors with views to the courtyard or street. Corridors and lobbies receive ample natural light and cross ventilation reducing the dependency on artificial light and mechanical ventilation. It is also noted that, as the development is a boarding house, natural cross ventilation is not a formal requirement to comply with.
Residential Amenity Impacts	The development overshadows the western façade of the southern block of 3-9 Church Ave during the winter solstice between the hours of 1 to 3pm. This appears to be the only time that these units are provided with any solar access.	Refer to the response to Request for Information prepared by Mecone and detailed Shadow studies in ***Attachment 3*** for detailed analysis.
	It is surrounded by residential buildings – existing residents that will no longer have access to sunlight/ natural light and will be forced to look upon a building to house as many bedrooms as possible, rather than a balance of aesthetes, space, sustainability and profit.	
	The Current application is similar to DA13/271 (27 Church Ave and 18A & 22 John Street, Mascot) which initially consisted of a 3 tower design positioned in line with towers at 19-21 Church Ave &10-14 John Street. Council & JRPP ultimately refused the 3 tower design because of overshadowing and solar access impacts to adjoining properties, the current application joins 2 towers with a centre 13 storey tower,	The proposed development has been carefully designed. It results in a development that is compliant with the zoning, height and FSR controls applicable under the BBLEP2013. Additional detailed solar, overshadowing, setback and view analysis studies have been prepared in ***Attachment 1, 2, 3*** and ***4.***

Subject	Submission Comment	Applicant Response
	which is not managed correctly will have significantly far greater impacts than those initially realised in DA13/271.	
	The fact the building will tower over existing buildings significantly and obstruct access to sunlight, views etc. It also appears to be built up to every boarder of the site.	
	The 13 storey middle block of the 'U' shaped development disrupts the existing view corridor currently maintained by the neighbouring developments. This is something that must be maintained for all future developments.	The proposed development, with its three buildings ranging in height from 7 to 12 storeys, is in alignment with the height of the surrounding existing and approved buildings envelopes whilst ensuring careful consideration of the outlook and view sharing of neighbouring buildings. The development continues the street wall height along John Street with the highest portion of the proposal located in the centre of the site and perpendicular to John Street and Church Avenue. Furthermore, in contrast to the approved DA on the subject site, the proposed development provides a reduced height and deeper setbacks, which provides a significant improvement to the sharing of views for the neighbour in the south. Refer to the detailed view analysis studies in ***Attachment 2.***
	The DA does not take into consideration the thermal loading impacts to neighbouring buildings e.g. reflected heat, sun glare, obstructed wind flow.	Careful consideration has been made in regard to wind, thermal qualities and sun reflectivity. The DA was supported by a Solar Light Reflectivity Study, a *Pedestrian Wind Environment Study* and a *BCA Report* which addresses and demonstrates thermal compliance.
	The proposed building of 13 storeys will deprive many north facing apartments in the upper levels of 214-220 and 208+210 Coward Street of their iconic sweeping views of the city skyline, including Sydney Tower and the CBD. It would be more appropriate to limit the number of storeys to 8, to match the existing immediately surrounding buildings.	A detailed view analysis study has been prepared In ***Attachment 2.*** The proposed development has been carefully designed. It results in a development of 7 to 12 storeys that is compliant with the zoning, height and FSR controls applicable under the BBLEP2013.
	The building obstructs critical sunlight to almost all surrounding buildings giving its towering height of over 12 storeys and being built up to every border. This will especially impact Rina Apartments dramatically (3-9 Church Ave, Mascot). Sunlight access requirements in existence would be completely detrimental for a significant number of existing residents and properties. This is not acceptable. The new building may meet its own sunlight access requirements but only by destroying that of many surrounding buildings. The design	The proposed development has been carefully designed. It results in a development that is compliant with the zoning, height and FSR controls applicable under the BBLEP2013. Additional detailed solar, overshadowing, setback and view analysis studies have been prepared in ***Attachment 1, 2, 3*** and ***4*** These studies show that the design of the development is intended to carefully balance amenity of the future and surrounding development from a solar

Subject	Submission Comment	Applicant Response
	should be changed significantly to reduce the level of sunlight access/ shadowing impact.	perspective, while still complying with the maximum yield capable of achievement.
Public Transport, Traffic and Parking	Traffic Management Plan report submitted to Council mention 20-minute trip by bike. Yet in page 28 of this report, statistically only 2.5%-5% of students use bicycle parking, which implied only miniscule amount of students are using this transport mode due to various reason such as inadequate dedicated cycling path to intended destination. Some cycling path mentioned in the report are also poorly designed or actually shared path (with car), which doesn't encourage bicycle usage. Meaning most student will use public transport.	A revised *Green Travel Plan* has been prepared by TTPP. Refer to ***Attachment 8*** for detailed discussion.
	There is no necessity to build Student Housing in this area, since the closest university (Sydney University) from the above address is 65min walk or 37 min by public transport. Other major university (UNSW) is 70 min walk or 40min walk by public transport. There is no other TAFE or colleges within walking distance from the vicinity.	Refer to the updated *Green Travel Plan* in ***Attachment 8*** for detailed discussion. Further, Iglu's primary focus is to provide thoughtfully planned, safe, student accommodation buildings that respond appropriately to their respective environments and are built in locations with easy access to public transport, essential services and areas of amenity and enjoyment.
	The figure of 1,545 added to the already over-capacity Train Station will risk the safety of anyone on/off the platform getting on and off the train. This will carry the Stress to Green Square Train Station.	The proposed plan supports and provides facilities for other modes of transport, including carshare and bicycle usage**.** Refer to the updated *Green Travel Plan* in ***Attachment 8*** for detailed discussion.
	John Street and Church Avenue are already a carpark and it is nearly impossible to get in and out of the existing carparks that belong to the apartments that have been built on both streets.	The *Operational Plan of Management* in ***Attachment 12*** clarifies that students will not be permitted to seek resident parking permits from Council. This will be notified via signage on-site and a notice included in all student's welcome email/ package. In addition, students will be informed of alternative modes of transport to the site from key locations (e.g. airport). The welcome email for the subject Mascot site will also note the lack of parking availability on-street as well as on-site. An example of a welcome email for an existing Iglu student accommodation site is provided in Appendix B of the *Operational Plan of Management* in ***Attachment 12***.
	No Provision of onsite parking as the area suffers from a shortage of on street parking.	
	The application proposes to provide no car parking, no motorcycle parking, no visitor parking, no staff parking and no disabled parking spaces for the development, the applicant is relying on a Clause 4.6	A revised *Green Travel Plan* has been prepared by TTPP. Refer to ***Attachment 8*** for detailed discussion.

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	Variation to justify a variance in the DCP to support its design for NIL car spaces – this is not supported by the local community The development is governed by Part 3A – Car Parking as noted in BBDCP 2013, tabled below, which states; **Table 1 - Car Parking Provisions by Land Use** **Land Use** / **Minimum Car Parking Spaces Required (GFA refers to gross floor area)** **Residential Accommodation** Attached dwellings — 1 space / dwelling Boarding houses — As per requirements stipulated in State Environmental Planning Policy (Affordable Rental Housing) 2009 SEPP (ARH) 2009, clause 14, indicates the following; *"(2) General* *A consent authority must not refuse consent to development to which this Division applies on any of the following grounds:* *(a) parking if:* *(i) in the case of a development application made by a social housing provider for development on land in an accessible area—at least 0.4 parking spaces are provided for each dwelling containing 1 bedroom, at least 0.5 parking spaces are provided for each dwelling containing 2 bedrooms and at least 1 parking space is provided for each dwelling containing 3 or more bedrooms, or* *(ii) in any other case—at least 0.5 parking spaces are provided for each dwelling containing 1 bedroom, at least 1 parking space is provided for each dwelling containing 2 bedrooms and at*	An updated *Traffic and Parking Assessment Report* has also been prepared. Refer to ***Attachment 9*** for detailed discussion. Overall, the report concludes that "*the proposed development does not include any on-site car parking provisions as is typical of student housing developments and other Iglu sites. Iglu currently operate several student housing facilities and over 3,000 beds, in Sydney, Melbourne and Brisbane which have no car parking provisions. Iglu operate with a philosophy that encourages staff and students to use sustainable transport modes (i.e. public transport, cycling and walking) and has successfully operated with no complaints from students on the lack of parking provision or from Councils about students driving and parking off-site.* *The implementation of this GTP, in combination with no on-site car parking provisions, will be key to ensuring that students and staff are encouraged to use sustainable transport.*"

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	least 1.5 parking spaces are provided for each dwelling containing 3 or more bedrooms," *[emphasis added]* Taking SEPP into account, as noted above, the approximate minimum number of car spaces for this development is 218, if circumstances where the applicant is proposing NIL, these are grounds for the consent authority to refuse consent It is unreasonable for the applicant to assume; • No staff or resident will require a car space • 'that it will be expected that both staff and residents rely on alternate and sustainable forms of transport' (see page 55 of the SEE) • 88 bicycle spaces will be sufficient to cater for a development of this size While it is acknowledged that council are empowered to slightly vary controls, eliminating the controls to NIL car spaces is in contravention of those controls. This will place an enormous amount of pressure on the, already, scarce amount of carparking around the Mascot Precinct area.	
	The proposed development contains zero parking facilities, except storage for 88 bicycles. According to the ARHSEPP there should be 0.5 car parking spaces per bedroom plus 1 motorcycle space for each 5 bedrooms. I.e. there should be parking for 218 cars and 87 motorcycles. Parking in John Street and Church Ave is already difficult to find and an extra 435 residents without any parking spaces will only exacerbate the situation and cause more traffic jams in the area.	Refer to the updated *Traffic and Parking Assessment Report* in ***Attachment 9*** and the revised Green Travel Plan in ***Attachment 8*** for detailed discussion. The proposed revised plans have included an increase from 88 bicycle spaces to 91 bicycle spaces in the dedicated Lower Ground bicycle storage room.
Community Infrastructure and Facilities	Bayside Council needs to purchase this site and provide ore green space for all the surrounding apartments. The plans that were put in place to design and build a family friendly community space at Linear Park has become non-existent because of the Asbestos was found in the soil.	This response to Request for Information is supported by an updated Landscape plan in **Attachment 6.** The proposed development provides landscaping that will not only enhance the site, will create a high amenity environment for

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	We don't need new building as the existing building are still available to occupy, such as Esprit, Avantra, Mascot Central and other Merton new sites. We need more park rather than building.	residents and visitors. It will also provide a green and aesthetically appealing outlook from the public domain and nearby residential development when compared to the existing warehouses and minimal landscaping on site. At ground level, the proposed development includes deep soil areas and permeable landscaping in the public domain along John Street and within in the sunken communal centralised courtyard that will contribute to 360m^2 (15%) of deep soil landscaping. Landscaping will be provided in the rear and side setbacks as well as on the façade for the building to provide a green and pleasant outlook when viewed from the public domain. The plantings will include a central green turfed lawn and courtyard forest which include a canopy of mature trees. The selection of plant species has been chosen to reflect the native and historic vegetation within the Mascot area whilst introducing a selection of exotic species that deliver diversity and vibrancy to the colour palette. The species of plants have been carefully selected to reflect the native and historic vegetation within the Mascot area whilst introducing a selection of exotic species that deliver diversity and vibrancy to the colour palette and that provide important food sources for the local fauna. The Landscaping incorporates 2,626 (81.2%) proposed native plants out of a total 3,232 plants. The easement will transform into an active pedestrian through site link and laneway incorporating a community garden with freestanding and movable vegetable planters. These will contain productive plantings and trees to encourage interactions with nature, the residents and community as a whole. The proposed pedestrian though-site link which will also enable access from John Street though to Church Avenue, increasing permeability, regenerate and enliven the existing service lane and encourage engagement between the broader community and resident. The community vegetable garden incorporates freestanding vegetable crates which can be moved as necessary to ensure access. The crates are also sited in a location that is beyond the vehicular access points. Appropriate lighting will also be installed and glazing on the western façade to ensure security, safety and passive surveillance from within the communal area of the building.
	Many young families live around this area and need green space such as park and playgrounds areas which are already struggling at the moment. Adding more resident in this area will put even more pressure on the existing facilities.	
	With each development proposal being approved individually, the area between Bourke Street and O'Riordan Street is quickly becoming a concrete jungle. Bayside Council should take responsibility for developing the area with regard to the needs and wellbeing of the local residents. It would be good if the Council could purchase this site and provide more green space for all the surrounding apartments.	
	What is the development contributing to the existing community like Mascot Square at 619-629 Gardeners Rd was required to provide? I.e it contributed Stansfield Park. The student accommodation development should be required to deliver such open community space for the development itself and the close community as a minimum.	
	As there is a distinct lack of wide public open spaces & parks in the Mascot station precinct area, the Bayside Council runs the risk of turning the Mascot train station precinct into a future "ghetto" not unlike the Department of Housing high rise apartment complexes in the Waterloo and Redfern areas. I am very familiar with the social housing apartment complexes in the Redfern and Waterloo areas as I drive by them every day on the way to my workplace in Redfern.	

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Nearby Developments	13A Church Ave should be considered as. 'vacant' in that the final form of development over that land is not yet certain. The proposed development in its current work may unreasonably impact the future development potential of that site.	Development Consent DA-2013/56 over the site at 13A Church Avenue has approved the demolition of existing building and erection of a 12-storey residential building containing 103 apartments, two basement levels and one ground level parking areas including 110 parking spaces. Since first being lodged in March 2013, the proposal has undergone various modifications. The latest modification to the application was approved in November 2019 and this built form has been reflected in the architectural plans. The subject site represents the last remaining developable block that has either been redeveloped already or does not contain an existing consent supporting redevelopment. The proposal has had to consider the impacts on and from the surrounding existing developments/approvals and provide a reasonable outcome on the subject site. The proposed DA has made consideration of this approved DA over the site at 13A Church Avenue with appropriate setbacks considered in the design and will not impact the development potential of the site in the north.
Damage to Existing Buildings	Unstable land / foundations to existing buildings. With new construction going on, it will make existing building sink due to erosion. There are verified reports that detail the new development at 27 Church Ave building practices caused and /or contributed to the Mascot Towers critical issue. The one reported heavily in the news being 1-5 Bourke Street, Mascot. The buildings in the direct area of this application at 13B Church Ave were built based on the Mascot Master Plan from a number of years ago and were not exceeding 8 storeys. Some are less i.e. 4 storeys especially 18-26 Church Ave, Rina 3-9 Church Ave and 21 Church Ave – all of these directly neighbour the site. We are gravely concern over the development practices of this 13B site will disturb surrounding existing properties. The development of 13B Church Ave, Council, planning assessment board and State Government owe a duty of care to existing owners and residents. What is proactively being done to ensure that there is no detriment to existing structures? All existing buildings built under	The developer, Iglu, is a renowned student accommodation provider and has a strong reputation for delivering high-quality designed developments that cater to tertiary student populations throughout Australia. Iglu's primary focus is to provide thoughtfully planned, safe, student accommodation buildings that respond appropriately to their respective environments and are built in locations with easy access to public transport, essential services and areas of amenity and enjoyment. The proposal does not require the excavation of a basement and substantial analysis and studies have also been undertaken to ensure the subject site is suitable or its intended use and will not detrimentally impact structurally on any of the neighbouring sites. A *Remedial Action Plan* and supporting *Asbestos Management Plan* and *Acid Sulfate Soils Management Plan* were prepared with the lodged SEE. The RAP documents the remediation/

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	the restrictions of the previous Mascot Master Plan are at major risk This is not acceptable.	management procedures and standards to be followed to address noted impacts in order to make the site suitable for the high-density residential land use and safeguard the protection of both human health and the environment. Additional Geotechnical Investigations and Civil studies have been undertaken by JK Geotechnics and Integrated Group Services, both of which have a good reputation in the industry.
	Risk of damage to existing buildings like Mascot Towers has arguably been damaged by the practices of the 12 - storey building next door.	
	Hammering during piling will definitely impact the surrounding old and new building structures. We don't want the issue with Mascot Tower repeated again.	
Noise	There will be additional noise and disturbing behaviour due to students living on the premises having parties or congregation of large crowd around the vicinity. This will make negative contribution to the area, making it unsuitable for the families and couples living within the vicinity of the intended site.	To ensure that the student accommodation is not adversely impacted by the surrounding noise environment or result in adverse noise impacts, a noise impact assessment has been undertaken by *Acoustic Logic Consultancy Pty Ltd (**Attachment 7**)*. For further clarification, refer to Mecone's response to RFI and the Operational Plan of Management (***Attachment 12***).
	Great deal of noise causes street and can have a negative impact on health and productivity. We are a young family with a toddler who those to reside here knowing that there will be parks and community facilities, not blocked small one-way street filled with heavy machinery and construction vehicles. This is causing anxiety and unsafe feeling.	
	To have this type of accommodation in a residential area away from the university with also impact the already struggling train and bus network. I am concerned that the concierge will not be able to control more than 435 student and the excessive noise and loitering in the streets.	
	The proposed development will cause adverse noise on nearby residents who are classified as sensitive receivers due to students having parties, playing loud music, yelling and screaming and /or drinking and this will become unbearable for the existing families and couples living in the vicinity or the proposal as this could at all hours of the day/night.	
Impacts of the rooftop facilities	The basketball court and exercise area on the roof top will cause noise and disturbance to the surrounding developments. If a basketball court is to be provided, it should be provided within the building or on the front setback to John Street with appropriate screening. While a passive recreation area on the rooftop is supported, there needs to be a management regime in place to	The *Operational Management Plan* (***Attachment 12***) stipulates that for the outdoor communal terraces, loud noise (including music), is prohibited in external common areas. To ensure *Iglu* residents are not disturbing our surrounding neighbours' and to adhere to

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	ensure it is used appropriately in terms of activities, hours of use and maximum number of persons at any one time.	Council regulations, all outdoor areas will be closed from 10:00pm. All residents must move inside the building at this time. The use of the rooftop basketball court on the northern block will be restricted between the hours of 9am to 6pm. Outside of these hours the basketball court will be off limits for use by residents and locked to prevent unauthorised entry.
Through Site Link	The proposed through site link is a shared zone with cars and service vehicles. It does not propose any pedestrian protection or any other measure to separate pedestrians and traffic. The proposed through site link is not wheelchair accessible for non-residents. This can't be seen as a through-site link.	Pedestrian access to the site is accessible from both John Street on the southern boundary (primary frontage) and Church Avenue to the north (rear access). Access to the building will be secured using a swipe card. CCTV will also be installed for additional security. The rear of the site can be accessed via the easement off Church Avenue. One (1) side door directly off the easement and communal vegetable garden will provide DDA access into the lower ground floor lifts to the other levels. A through-site link on the western boundary provides pedestrian access from John Street, (primary frontage, to both the community vegetable garden and John Street beyond. DDA Access to the community garden can be made available to the public via the internal lifts within the development as well as from Church Avenue in the north. Refer to the *Operational Plan of Management* in ***Attachment 12*** for detailed discussion.
Truck Loading Dock	The proposed truck loading dock is proposed with a 3m clearance. This does not meet Australian Standards.	*Varga* have prepared an updated Traffic and Parking Analysis Report with swept path analysis or the proposed MRV truck. This plan confirms the MRV truck is safely and acceptability able to be manoeuvring into the loading bay accessed via Church Avenue. Refer to **Attachment 9** for full details. Further, the geometric design layout of the proposed truck loading bay facilities has been designed to comply with the relevant requirements specified in the Standards Australia publication *Parking Facilities Part 2 - Off-Street Commercial Vehicle Facilities AS2890.2* in respect of loading dock dimensions and service area requirements for MRV trucks.
Privacy	The units with a western orientation will have privacy issues with the existing neighbouring buildings of 19-21 Church Ave and 3-9 Church Ave. There a no privacy devices proposed to reduce impact of	The proposed development has been designed to comply with Part 4C.2.6 Setbacks, which applies to residential flat buildings, despite actually being a boarding house and not defined by the

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	privacy to neighbours. Large clear awning windows do not provide any privacy to neighbouring properties.	RFP controls. The front setback incorporates 42m^2 of landscaped deep soil zones along John Street. The development has been designed to create spatial separation between the buildings and is consistent with the bulk and scale of the buildings in the surrounds. This spatial separation also supports natural ventilation, solar access, and visual and acoustic privacy buffers to neighbouring developments. Refer to the View Loss Analysis and detailed shadow analysis in ***Attachment 2*** and ***3*** for further information. The infill panels (solid / windows) provide control of outlook at internal corners, ensuring unobstructed window views. The lodged DA includes a wrap-around landscaped planter-box zone around the entire south roof terrace. As illustrated on Page 21 of the Revised Landscape Plans (***Attachment 6***), the communal rooftop has been revised to allow for a greater landscape planter along the western side of the communal rooftop. These plans continue to provide extensive planting, including vertical planting on the facade trellis, providing an acoustic and visual buffer from the neighbours. Refer to Mecone's response to RFI for detailed discussion (Section 2.5).
	The proposal seeks to place 110 windows to the northern elevation on the 6m setback for 11 storeys. We are concerned about privacy impacts of those windows overlooking into the communal open space area as well as across to a future development on 13A Church Avenue especially given there is no relief in the separation for floors above the 4th storey.	
Restrictions of use of the easement	Legal issues existing as the proposed amalgamation of the lots comprising the site cannot give the land at 6-8 John Street all the benefits and rights benefits of the easements currently registered on the title for 13B Church Ave.	The site is not identified in the DCP as an amalgamation opportunity. Despite not having a site requiring site amalgamation, the proposal has amalgamated surrounding allotments (6-8 John Street as well as 13B Church Avenue) to ensure a consistent and consolidated approach can be realised on the allotment. The Survey Plan and the Architectural Plans illustrate that the site (Lot 2 DP547700) is affected by an existing shared access easement located off Church Avenue. The existing easement is used as driveway to provide vehicular access to the existing adjoining 8-storey residential flat buildings located at 10-14 John Street. The proposed student accommodation development has been carefully designed with consideration to the easement with a 4.7m setback on the western boundary to accommodate the easement and ensure appropriate building separation. The easement will also continue to be used as an access point and driveway for

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		neighbouring residential sites whilst also providing service access to the loading dock of the proposed student accommodation.
Mobile Towers	The DA does not take into consideration the mobile towers which has been installed on the roof of 19 Church Avenue, and the health and safety impacts of dwellings being situated directly opposite the mobile towers.	There are no mobile towers proposed on the buildings.
Contamination	The proposal is not environmentally suitable as contaminated land is present and therefore can adversely impact the health of people living there. The *Preliminary Site Investigation* (PSI) and *Detailed Environmental Site Investigation* (DSI) has recommended an *Acid Sulphate Soil Management Plan* (ASSMP), however the ASSMP clearly advises that; • Additional testing with the proposed excavation area is required as brown clayey sand natural material identified as *Potential Acid Sulfate Soil* (PASS) was found above the water table in other areas of the site. • Only limited field and lab assessment of PASS conditions and testing within the proposed excavation area has been undertaken and that further investigations should be conducted. If this development is approved and the ASSMP is conditioned, there will be no way for Council to check to if the plan is actually being implemented – there are no regulations for this, therefore the ASSMP is not effective to ensure the health of people that will live there is protected.	To ensure the site could be made suitable for the proposed use, a *Remedial Action Plan* and supporting *Asbestos Management Plan* and *Acid Sulfate Soils Management Plan* was been prepared by JBS&G Australia Pty Ltd. As notated in the SEE. A summary is discussed below; **Remedial Action Plan** The DA is supported by a Remedial Action Plan (RAP) which incorporates the findings and recommendations of the Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI). The RAP documents the remediation/management procedures and standards to be followed to address noted impacts in order to make the site suitable for the high-density residential land use and safeguard the protection of both human health and the environment. The RAP is also supported by an Asbestos Management Plan (AMP) and Acid Sulfate Soil Management Plan (ASSMP) that outline the systems and procedures for either the removal and/or in-situ management on site during the redevelopment works. In alignment with the recommendations, upon completion of the remediation works, a Validation Report will be prepared by a Specialist to document that the site is suitable for the proposed residential use, is suitably remediated and will not pose any risk to human health. **Asbestos Management Plan** An Asbestos Management Plan (AMP) supports the DA and details the necessary procedures to be applied to minimise any risk of exposure to site workers, visitors and the community for the duration of the proposed site redevelopment. It also outlines the correct

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		procedures of the removal or disposal of any asbestos off-site which is also addressed in the Remedial Action Plan (RAP). **Acid Sulfate Soils Management Plan** The Acid Sulfate Soil investigation was conducted during the Detailed Site Investigation (DSI) to determine the probability of encountering Potential Acid Sulfate Soils (PASS) or Acid Sulfate Soils (ASS) during the subsurface works. In response the potential risk of disturbing any Class 2 ASS on site, an Acid Sulfate Soils Management Plan was prepared. This management plan is based on the natural soils anticipated to be disturbed during the proposed site redevelopment and outlines the management techniques that may be employed to mitigate the potential environmental impacts. The report concludes that where existing and future assessment data identifies the presence of ASS or PASS materials, the measures outlined in the Acid Sulfate Management Plan will provide suitable actions to manage the risks associated with the proposed construction works and that if successfully implemented, these measures will minimise the environmental risks associated with any disturbance of PASS materials.