

Attachment A

<p>Summary of and Responses to Matters in Submissions</p>
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Summary of and responses to matters raised in submissions

Summary of submission	Response to submission
<p>Land and Housing Corporation</p> <p>Object to the City’s proposal to have an LEP clause that provides an incentive for the provision of social housing by allowing additional floor space on the condition that 100% of the gross floor area of the northern lot is used for the purposes of social housing. The reasons provided for this objection are that it:</p> <ul style="list-style-type: none"> - is not a valid planning consideration - doesn’t reflect any policy basis, and - represents an unacceptable operating constraint. 	<p>This objection is addressed in the body of the committee report.</p> <p>Recommended action: no change</p>
<p>Land and Housing Corporation</p> <p>In relation to the requirement for exceedance on BASIX energy, LAHC is of the view that increased BASIX targets are not the most appropriate means to drive energy efficiency and the mandating of higher targets is inconsistent with the BASIX SEPP, which states an LEP cannot require higher than the minimum.</p>	<p>The BASIX SEPP mandates provisions that aim to reduce consumption of mains-supplied potable water, reduce emissions of greenhouse gases and improve thermal comfort in all residential development. The BASIX SEPP sets the minimum standards that a development is to achieve. As such, the BASIX SEPP is what Council’s must rely upon to drive energy efficient outcomes.</p> <p>Clause 8 of the BASIX SEPP states that competing provisions of an environmental planning instrument, whenever made, are of no effect to the extent to which they aim to reduce potable water consumption, reduce emissions or improve the thermal performance of a building to which the SEPP applies.</p> <p>‘Competing provisions’ is defined by the SEPP to mean a provision:</p> <p style="padding-left: 40px;">“other than a provision that encourages, or offers incentives for, the adoption of measures beyond those required by provisions”</p> <p>The City’s proposed BASIX provision is an incentive provision where additional floor space above the mapped 1.5:1 is</p>

	<p>available conditional on the development exceeding BASIX commitments for energy by not less than 5 points.</p> <p>The City has reviewed the documentation provided and a 5 point exceedance is feasible without impacting on the sustainability goals of the project to achieve a fully electrified scheme. As such, the City proposes to retain its BASIX incentive provision.</p> <p>Recommended action: no change</p>
<p>Land and Housing Corporation</p> <p>Suggested amendments to the draft DCP in relation to minimum areas for non-residential use, required footpath upgrade and widening, flood protection and sustainability targets.</p>	<p>The majority of Land and Housing Corporation’s suggested changes to the draft DCP have been accommodated, as indicated in the attached DCP. They are considered minor changes that reflect design development and do not impact the intention of the original provisions.</p> <p>Land and Housing Corporation maintain that the required footpath upgrade and widening works are onerous in terms of cost impacts. The City views these public domain works as essential and reasonable given the scale of the development and the uplift in controls considered. In regard to cost, any offset against developer contributions can be considered at development application stage.</p> <p>Recommended action: majority of changes made as appropriate to the DCP</p>
<p>Demolishing the existing buildings will have an unacceptable impact on the heritage values of the St Phillips Heritage Conservation Area.</p>	<p>The existing buildings were constructed in 1989. They are not individually heritage listed but are within the St Phillips Heritage Conservation Area. They are listed as having a neutral contribution to the conservation area, meaning they do not contribute to or detract from the significance of the conservation area.</p> <p>The architectural merit of the existing buildings on site is not considered to be significant enough to warrant their retention when weighed against the overall strategic merit of the proposal. NSW Heritage have not objected to the demolition of the existing buildings.</p> <p>The draft DCP requires an archival photographic recording of the existing buildings on site prior to their demolition. It also requires an Interpretation Strategy to be prepared regarding the historic development of the area.</p> <p>Recommended action: no change</p>
<p>The proposed height and FSR will have an unacceptable impact on the heritage values of the St Phillips Heritage Conservation Area.</p>	<p>The existing buildings on site are considered to be a sympathetic infill for their time. In 1989, the built character of the area was very different to what is presented today. It was a predominantly one to two storey streetscape with a residential terrace, light industrial, commercial warehouse character.</p> <p>The character of the area has evolved since 1989. The built character of the area is now characterised by one and two storey residential terraces sitting adjacent to 5-10 storey residential mixed-use developments, particularly at the eastern edge of the conservation area, along Cowper Street. It is</p>

	<p>appropriate therefore that the scale of the proposed controls responds to this contemporary context.</p> <p>The subject proposal introduces a three to eight storey scale to the subject site, which is considered to respond appropriately to the established context.</p> <p>The loss of the existing buildings and the construction of new development at a scale of three to eight storeys is not considered to detract from character of the conservation area. This is because this transition in scale already exists and therefore it will not be a new characteristic.</p> <p>Because of the detailed consideration given to the demolition of the existing buildings, it is considered appropriate to amend the boundary of the conservation area to excise the subject site. This provides certainty on the issue for future development application assessment. This is not considered to set a precedent, with any future proposal to demolish any other structure elsewhere within the conservation area being subject to its own assessment and assessed on its individual merits.</p> <p>Recommended action: no change</p>
<p>The existing low-rise buildings and are better suited to social housing. They should be retained and renovated. The proposed buildings will result in loss of amenity for social housing tenants.</p>	<p>The proposal facilitates the delivery of a contemporary residential apartment development that will need to demonstrate compliance with the amenity requirements of State Environmental Planning Policy 65 and the Apartment Design Guide. The future residential apartments therefore will have a level of residential amenity commensurate with any other contemporary residential apartment built in the City of Sydney.</p> <p>The provision of social housing is the responsibility of the NSW Government. This includes a responsibility to plan for, deliver and maintain housing appropriate to current and future tenants. The design of the new social dwellings will greatly improve the quality and amenity for future social residents. In particular, level access will be provided to every social dwelling, sustainability measures aim to reduce utility costs, the orientation of units and entrances from the street which will improve safety for residents and the wider community.</p> <p>Future residents of the site will have excellent access to a wide range of jobs within the area, to local and regional level retail services and facilities at Glebe Point Road village and Broadway Shopping Centre, to community services and facilities within the surrounding area, and to extensive open space and recreation facilities.</p> <p>Recommended action: no change</p>
<p>Insufficient social housing to justify the proposal.</p>	<p>The City seeks to substantially increase the amount of affordable housing (both social and affordable rental housing) in the local government area at every opportunity. This is especially the case for NSW Government owned sites which have an obligation to contribute to the NSW Premiers Priority to reducing homelessness across NSW by 50% by 2025 and comply with NSW Government Policy including the Greater</p>

	<p>Sydney Region Plan and Land and Housing Corporation's Communities Plus redevelopment program.</p> <p>There are two policy approaches that can be applied to NSW Government owned sites in regard to requiring affordable housing. The City's Local Strategic Planning Strategy - City Plan 2036 approach and the NSW Government Policy approach. Consideration needs to be given to both in order for a reasonable and defensible policy position to be reached.</p> <p><u>The City Plan 2036 approach</u></p> <p>City Plan 2036 requires the planning proposal authority to:</p> <ul style="list-style-type: none">- Action L3.5 - deliver a minimum 25% of floor space as affordable rental housing in perpetuity on all NSW Government sites, including on social housing sites, and- Action L3.6 - significantly increase the proportion of social housing on NSW Government sites that are being renewed. <p>For Cowper Street this means the benchmark for giving effect to City Plan 2036 is delivering significantly more than the 19 social housing dwellings on site and 25% of floor space as affordable rental housing. Any additional social housing achieved can be counted towards the achievement of the 25% affordable rental housing target.</p> <p>25% of the residential floor space facilitated by the planning proposal equates to around 1,574sqm. To give effect to City Plan 2036, the planning proposal is to ensure the delivery and maintenance of more than 19 social housing dwellings on site and an additional 1,574sqm of social housing.</p> <p>The City's proposed incentive provision delivers 2,691sqm of social housing floor space, 1,117sqm in excess of the 25% target, as a minimum. This equates to 35 affordable housing dwellings, a significant increase in the 19 social housing dwellings on site. Given the built configuration of the subject proposal and the NSW Government policy considerations below, the delivery of 2,691sqm of social housing floor space as a minimum for this site is considered to give effect to City Plan 2036.</p> <p><u>The NSW Government Policy approach</u></p> <p>Communities Plus is a Land and Housing Corporation 10-year redevelopment program for the delivery of:</p> <ul style="list-style-type: none">- 23,000 new and replacement social housing dwellings, 500 affordable housing dwellings and 40,000 private dwellings in NSW, and- a targeted mix of 70% private and affordable and 30% social housing dwellings per site. <p>As NSW Government Policy, and as per the NSW National Housing and Homeless Agreement, the delivery and maintenance of 30% social housing on any Land and Housing Corporation site needs to be secured. The proportion of affordable rental housing delivered and maintained on site is to</p>
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	<p>be in accordance with the Greater Sydney Region Plan and Eastern City District Plan.</p> <p>The Greater Sydney Region Plan and the Eastern City District Plan includes a target range of 5-10% of new residential floorspace to be delivered and maintained as affordable rental housing. In absence of a holistic Land and Housing Corporation strategy for the delivery of new and replacement affordable housing across the City of Sydney Local Government Area, the City and the NSW Government must take every opportunity to increase the provision of affordable housing and the maximum 10% target of new residential floorspace to be delivered and maintained as affordable rental housing should be applied.</p> <p>The City's proposed incentive provision delivers a minimum of 47% of permitted residential floor space on site as social housing floor space, 7% in excess of the combined NSW Government policy requirement.</p> <p>Because the City's proposal delivers in excess of what NSW Government Policy requires, and satisfies the City's City Plan 2036 requirements, the 47% minimum social housing required to be delivered and maintained on site is considered be a reasonable and defensible policy position.</p> <p>Recommended action: no change</p>
<p>The proposal will privatise public land.</p>	<p>Promoting the delivery and maintenance of affordable housing is an object of the Environmental Planning and Assessment Act 1979 (the Act) under Section 1.3(d).</p> <p>Affordable housing under the Act includes social housing. Promoting the delivery and maintenance of social housing is therefore a first principle planning consideration.</p> <p>The City's proposal as structured promotes:</p> <ul style="list-style-type: none"> - the delivery of social housing, by providing a Floor Space Ratio (FSR) incentive contingent on the delivery of social housing, and - the maintenance of social housing by securing the northern site for the purposes of social housing as a minimum. <p>The proposal does not restrict the redevelopment of the southern site for private market housing. The southern site could be sold to fund and facilitate the delivery of social housing on the northern site. It could also be used for the purposes of social housing and remain in public ownership. The sale of the southern site would facilitate the delivery of much needed social housing on the northern site and the orderly and economic use of the southern site.</p> <p>This mixed ownership model is in line with the NSW Government's Future Directions for Social Housing policy which aims to deliver a new integrated housing developments in partnership with the private and community housing sectors.</p> <p>Recommended action: no change</p>

<p>Objection to segregate households according to income with separate buildings for social housing residents and private owners.</p>	<p>Evidence suggests that community housing providers and the NSW Government prefer single tenure buildings because these are easier and more cost effective to manage. Unlike mixed tenure buildings, single tenure buildings are generally less expensive to build and costs can be reduced because strata fees may not be required. Single tenure social housing can be managed more efficiently as providers do not have to consider private landowner matters.</p> <p>The social benefits of a mixed tenure community are achieved in this project due to the mix of private and social housing across the whole development site and the surrounding neighbourhood. In absence of a policy that requires mixed tenure buildings, there are no grounds to amend the proposal.</p> <p>Recommended action: no change</p>
<p>Overdevelopment the local area with excessive bulk and scale.</p>	<p>The subject proposal introduces a three to eight storey scale to the subject site, which is considered to respond appropriately to the established context.</p> <p>Recommended action: no change</p>
<p>Removing the site from Heritage Conservation Area.</p>	<p>Because of the detailed consideration given to the demolition of the existing buildings, it is considered appropriate to amend the boundary of the conservation area to excise the subject site. This provides certainty on the issue for future development application assessment. NSW Heritage have not objected to the proposed change in conservation area boundary.</p> <p>Recommended action: no change</p>
<p>Demolition will set a precedent for a change in scale across the Heritage Conservation Area.</p>	<p>Whilst any demolition of the existing buildings on site will be the subject of a future development application and assessment, it is acknowledged that the subject planning proposal will facilitate their future demolition and therefore it is an important consideration for this planning proposal.</p> <p>The demolition of the existing buildings on site has been carefully considered against the overall strategic merit of the proposal. The architectural merit of the existing buildings is not considered to warrant their retention. The position of the site at the edge of the conservation area, where there is already a transition in scale, is also considered an important consideration. The loss of the existing buildings and the construction of new development at a scale of three to eight storeys is not considered to detract from character of the conservation area. This is because this transition in scale already exists and therefore it will not be a new characteristic.</p> <p>Because of the detailed consideration given to the demolition of the existing buildings, it is considered appropriate to amend the boundary of the conservation area to excise the subject site. This provides certainty on the issue for the future development application assessment. This is not considered to set a precedent, with any future proposal to demolish any structure</p>

	<p>elsewhere within the conservation being subject to its own assessment and assessed on its individual merits.</p> <p>Recommended action: no change</p>
<p>The inclusion of non-residential floor space will compete with, detract from and impact the viability of businesses along Glebe Point Road.</p>	<p>The proposal includes the provision for two non-residential spaces at ground level. One on Wentworth Park Road, designated for a social purpose and one on Cowper Street, designated for commercial or retail use. The detailed use of both spaces will be the subject of a future development application.</p> <p>The minimum area of both spaces has been reduced in size at the request of the proponent following design development. It is not considered that the provision of non-residential floor space in the development will detract from or impact the viability of businesses along Glebe Point Road. This is by virtue of their limited size and their ability to service a growing population in their immediate vicinity.</p> <p>The provision of a small amount of non-residential uses within the development is considered to be consistent with the sites zoning objectives to enable other land uses that provide facilities or services to meet the day to day needs of residents.</p> <p>Recommended action: DCP amended to show reduced size for non-residential areas</p>
<p>The warehouse design of the development is incongruous with Glebe's established character and will be obtrusive within the streetscape.</p>	<p>The detailed design of the proposal will be the subject of a future development application in regard to architectural style, detailed form and materiality. Notwithstanding, the subject planning proposal and DCP does propose a new building envelope that facilitates a future modern architectural form.</p> <p>The built character of the sites immediate locality can be described as diverse. Immediately east of the site are two storey residential Victorian terraces, across MJ Doherty Reserve is the 11 level post war modernist John Bryne Court, south of the site are predominantly single storey residential Victorian terraces and west of the site are contemporary five to ten storey residential mixed-use developments. The contemporary residential mixed-use developments incorporate a high proportion of brick finishes in a form that strongly defines the public domain.</p> <p>A contemporary eight storey form on the subject site is not be considered to be obtrusive in this diverse context. How the subject site addresses Wentworth Park is also considered an important consideration. Wentworth Park is framed by numerous original warehouse and contemporary developments, particularly along Harris Street, at seven stories and above. A continuation of this scale along Wentworth Park road is considered to be positive, providing a strong built edge and activation to the park, and amenity for future occupants.</p> <p>Recommended action: no change</p>
<p>Insufficient provision of schools to support</p>	<p>Education is provided by the NSW Government as well as independent schools, colleges and universities. The City West</p>

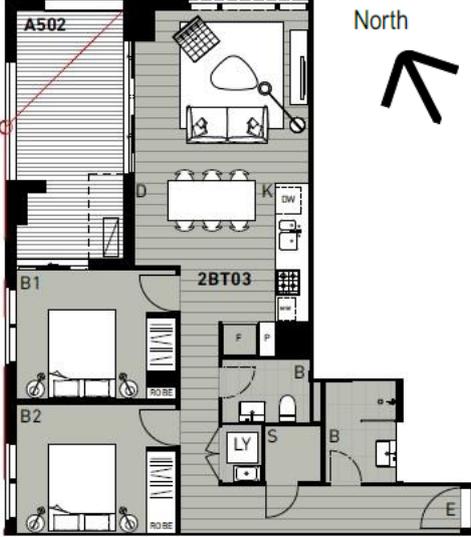
<p>additional density in the area.</p>	<p>area of the city is currently serviced by five primary schools, four secondary schools and two tertiary institutions.</p> <p>School Infrastructure NSW are responsible for the planning and delivery of government primary and secondary education infrastructure. Government schools within the area include Forrest Lodge Public, Glebe Public, Ultimo Public and Sydney Secondary College. The site is currently within the Glebe Public and Sydney Secondary College catchments, both of which are within 500 metres walking distance. A redevelopment of Ultimo Public School was completed in 2020 and is within 500 metres walking distance.</p> <p>As part of consultation completed for the City's Local Strategic Planning Statement in 2019, School Infrastructure NSW confirmed current and planned school capacity was projected to meet demand in the area to 2031. There is considered to be sufficient capacity therefore in the area to accommodate any demand created by the proposed density increase. It is noted Shelter NSW in their submission of support for the proposal highlight the sites excellent access to high-quality education opportunities and the benefits this affords.</p> <p>It is noted that more significant residential density increases may be generated by NSW Government led projects within the wider area including at Blackwattle Bay, Bays West and in Pyrmont. The City will continue to advocate for the appropriate provision of education infrastructure to support any significant residential density increases generated by these projects.</p> <p>Recommended action: no change</p>
<p>The proposal impacts upon existing lease agreements with Land and Housing tenants.</p>	<p>Issues related to lease agreements are not a planning consideration for the City. Issues related to lease agreements are a matter for the leasee and lessor.</p> <p>Recommended action: no change</p>
<p>Any profit from the development should be given to a public trustee, not Land and Housing.</p>	<p>The cost of any subsequent development, or indeed how those costs will be met by Land and Housing or their private and community sector partners is not a matter for planning consideration. Land and Housing has indicated that the sale of part of the site for market housing will reduce the cost of supplying additional social housing.</p> <p>Recommended action: no change</p>
<p>The proposal will disrupt the community that currently lives there removing them from friends, services, community activities etc.</p>	<p>Land and Housing have stated that a dedicated relocation team will work with individual tenants to negotiate relocation plans. Existing tenants will be offered a tenancy in the new social housing building should they express an interest, as part of the relocation planning process.</p> <p>As part of the relocation planning process for tenants, options to relocate to housing within their existing neighbourhood are discussed. Additionally, tenants will be offered a tenancy in the new social housing buildings should they express an interest.</p>

	<p>Recommended action: no change</p>
<p>Department of Communities and Justice should renovate and tenant existing social housing in the area to increase social housing provision first, before redeveloping sites.</p>	<p>The provision of social housing is the responsibility of the NSW Government. This includes a responsibility to plan for, deliver and maintain housing appropriate to current and future tenants. It is beyond this proposal for the City to require the renovation and optimisation of existing social housing.</p> <p>Recommended action: no change</p>
<p>No more social housing and no more additional height and density. The proposal creates too much additional traffic which causes congestion, creates parking issues, noise and pollution.</p>	<p>A traffic, transport and parking study prepared by ARUP was submitted in support of the proposal and placed on public exhibition. The study concluded that the traffic generated by the proposed development to the surrounding road network would have a negligible impact on road network operation. This view was supported by the City's Transport Planner who identified broad support for the proposal in relation to potential traffic, transport and parking impacts.</p> <p>Traffic, transport and parking impacts will be addressed in detail at development application stage when final parking numbers and access arrangements are known. The existing DCP and LEP are considered sufficient to manage potential future traffic, noise and air pollution generated by the proposal with controls already in place in relation to maximum car parking rates, restrictions on participation in on-street parking schemes, car share minimums and bike parking minimums.</p> <p>Recommended action: no change</p>
<p>No more social housing. No more is needed. It is already too much and it creates a noisy, dirty and unsafe environment and will reduce land values.</p>	<p>At a time when the wait list for social housing in NSW is almost 60,000 people, the demand has never been greater. Combined with a five to 10 year waiting period for social housing in the city, and the extra demand that will be created by the health, social and economic impacts of Covid-19, there is a critical need to deliver more social housing. This is especially the case in the city where additional social housing will contribute to increasing housing diversity and providing homes for essential workers.</p> <p>The proposal facilitates the redevelopment of the site consistent with crime prevention through environmental design principles and contemporary apartment design standards, in terms of acoustic privacy and waste management. Any other associated social impacts of the proposal are considered to be manageable. Any impact the property values in the area is not a planning consideration.</p> <p>Recommended action: no change</p>
<p>You are cramming poor people into the shadows.</p>	<p>The proposal minimises solar impacts to neighbouring properties on Cowper and Wentworth streets.</p> <p>The indicative reference scheme submitted with the planning proposal demonstrates built form has been appropriately located on the site to minimise overshadowing impacts on adjacent dwellings to the east of the subject site. This has been achieved</p>

	<p>by increasing setbacks along Cowper Street and changes to the building massing to reduce overshadowing on neighbouring properties.</p> <p>The solar analysis in the urban design report demonstrates there will be minimal impact on existing residential properties, with all but one neighbouring property continuing to receive at least two hours of solar access between 9am and 3pm in midwinter. This is considered to be an acceptable impact.</p> <p>The proposed development will create some additional overshadowing of the terrace houses on Cowper Street between 9am and midday. In particular, up to seven terraces will be impacted by overshadowing in a 2 hour period between 10am and midday but only in midwinter. There is no loss of solar access from the development for the terrace houses after midday. It is noted these impacts are only during midwinter and the terraces still receive a good solar access throughout the day.</p> <p>The solar analysis also demonstrates there will be no overshadowing impact on the adjacent open space including MJ Doherty Reserve and Wentworth Park.</p> <p>All apartments in the reference scheme will receive good solar access with over 80 per cent receiving at least two hours of solar access in midwinter, as required by the Apartment Design Guide.</p> <p>Recommended action: no change</p>
<p>The proposed community room will remain locked and not used.</p>	<p>The proposal and draft DCP requires the delivery of at least 165 square metres of non-residential space for social purposes. This is to be provided on the Wentworth Park Road frontage. The use and operation of this space will be determined at development application stage.</p> <p>Recommended action: no change</p>
<p>The use of MJ Doherty Reserve as green space is questionable. This proposal will add additional demand for new public open space. The proposal has not demonstrated how that will be achieved.</p>	<p>The subject site has a frontage to MJ Doherty Reserve and Wentworth Park. As such, both parks are likely to be used by future residents as public open space. The draft DCP seeks upgrades to the surrounding pedestrian infrastructure to ensure safe and easy access to these parks. This includes pedestrian priority shared surfaces to Mitchell Lane East and Park Lane, and a footpath continuation along Wentworth Park Road across Cowper Street.</p> <p>In terms of access to open space and increasing demand for open space, the City has successfully advocated for the conversation of the return of Wentworth Park to the community as public open space once the lease for greyhound racing expires in 2027, as part of the Pyrmont Peninsula Place Strategy. This will offer a substantial increase in public open space in close proximity to the site.</p> <p>Recommended action: no change</p>
<p>The NSW Government will not guarantee the</p>	<p>The City's proposal as structured promotes the delivery of social housing, by providing a Floor Space Ratio incentive contingent</p>

<p>number of social housing dwellings on site.</p>	<p>on the delivery of social housing, and the maintenance of social housing on site by securing the northern site for the purposes of social housing as a minimum.</p> <p>Recommended action: no change</p>
<p>Redevelopment through this process means no new social housing will be delivered for at least 5 years, meaning in the interim a reduction in social housing, putting more people at risk to things like homelessness.</p>	<p>The provision of social housing is the responsibility of the NSW Government. This includes a responsibility to plan for, deliver and maintain housing appropriate to current and future tenants and ensure existing tenants are appropriately relocated and accommodated when sites are redeveloped.</p> <p>The NSW Land and Housing Corporation have stated that a rebuild is proposed in order to achieve an increase in the number of social housing dwellings onsite and to meet the objectives of the NSW Government’s social housing policy.</p> <p>The City supports this aim as it assists the City in meeting its own social housing targets and the NSW Premiers Priority to reducing homelessness across NSW by 50% by 2025.</p> <p>Recommended action: no change</p>
<p>The St Phillips Heritage Conservation Area is one of the most significant heritage areas in Australia. Its intact scale, the Victorian building stock and inter war and 1980s social housing are each significant features of this area.</p>	<p>The existing buildings are listed as having a neutral contribution to the conservation area, meaning they do not contribute to or detract from the significance of the conservation area.</p> <p>The architectural merit of the existing buildings on site is not considered to be significant enough to warrant their retention when weighed against the overall strategic merit of the proposal.</p> <p>NSW Heritage have not objected to the demolition of the existing buildings.</p> <p>Recommended action: no change</p>
<p>Currently, there are numerous vacant apartments across Sydney. Rather than demolishing good public housing in Glebe, funds should be directed towards purchasing existing private buildings and repurposing them for affordable housing.</p>	<p>The City has long promoted the delivery and maintenance of affordable and social housing through planning incentives both through affordable rental housing schemes in Ultimo and Pyrmont, Green Square and in the Southern Employment Lands and through site-specific planning incentives, including at 87 Bay Street, Glebe, the Glebe Affordable Housing Project and at Harold Park.</p> <p>The City has also directly subsidised affordable housing projects including through grants and land subsidy to value of around \$27.5 million.</p> <p>The City seeks to substantially increase the amount of social and affordable rental housing in the local government area at every opportunity.</p> <p>This proposal presents an opportunity to increase the number of social housing dwellings on site in a manner consistent with City and NSW Government policy.</p> <p>Recommended action: no change</p>

<p>Marco economic principles explained.</p>	<p>Noted. Recommended action: no change</p>
<p>General comment on living under strata management and building quality.</p>	<p>Noted. Recommended action: no change</p>
<p>An oversupply of apartments in one area will have a negative impact on property values.</p>	<p>Any market housing would be required to subsidise the delivery of the social housing. Any impact the supply of market housing has on property values in the area is not a planning consideration. Recommended action: no change</p>
<p>View loss, including loss of view to partial greenery and view of Glebe Island Bridge, and devaluation of apartment.</p>	<p>The general layout of apartment A502/11 Wentworth Street (4-6 Elger Street), Glebe is shown below. The apartment enjoys access to outlook and views to the north and west from the living room and balcony.</p> <p>Existing outlook and views to the west over Cowper Street will remain unaffected by the proposal.</p> <p>Outlook to the north, into Wentworth Street, will remain unimpacted, with street trees and adjacent buildings still visible. Views to the north will be impacted. The existing views to the north are district views of greenery, partial views of Anzac Bridge and views of distant tall buildings at Pymont (see example photo). These views are across the subject site. No meaningful change could be made to the envelope to accommodate the views without unreasonably reducing the number of social housing dwellings delivered by the project.</p> <p>The impact on the north view is considered reasonable in this instance considering the strategic merit of the proposal. Also, A502's outlook and views to the west will not be impacted.</p>

	  <p>Recommended action: no change</p>
<p>Increasing density in an area that is quite a walk away from decent public transport. The light rail goes nowhere and is not helpful.</p>	<p>The site is considered to be extremely well serviced by public transport, within 500 metres of bus routes along Glebe Point Road and Harris Street, within 500 metres of light rail and within walking distance of Central Station and a future metro station at Pyrmont.</p> <p>Recommended action: no change</p>
<p>Only one of the mature trees will remain. Where will the animals and birds go? There will be no new public green space created.</p>	<p>An Arboricultural Report and Tree Management Plan assessed the potential impacts of the development footprint on the trees within and adjacent to the site. The assessment made the following recommendations:</p> <ul style="list-style-type: none"> - retention of all adjacent street trees and park tree - retention of a Spotted Gum at the south western corner of 17-31 Cowper Street - relocation of seven palm trees, and - removal of all other trees within the site.

	<p>The assessment also notes that building setbacks on Cowper Street are appropriate given the size and heritage significance of the trees along this frontage.</p> <p>To mitigate some loss of trees, this planning proposal provides for a minimum site canopy cover of 18 per cent at ground level with additional rooftop planting. The provision of site canopy exceeds the 15 per cent requirement in the DCP and supports the City’s Urban Forest Strategy which seeks to increase canopy cover across the local government area to around 23 per cent by 2030.</p> <p>Recommended action: no change</p>
<p>No new tennis courts for the new residents.</p>	<p>The City West area of the city currently contains 3 multipurpose outdoor courts, 7 sports fields, 2 tennis courts, 4 indoor recreation centres, 1 aquatic facility and 3 indoor courts. This does not include facilities that are not accessible by the public, such as courts and fields on private property or areas such as university grounds. Further it does not consider courts available on NSW Department of Education lands.</p> <p>Public recreation facilities within walking distance of the site include the sports fields at Wentworth Park, indoor and outdoor courts at Peter Forsyth Auditorium, tennis courts at St James Park and recreation facilities at Ian Thorpe Aquatic Centre and Ultimo Community Centre.</p> <p>The site is considered to be sufficiently serviced with recreation facilities to accommodate the additional density. It is noted that more significant residential density increases may be generated by NSW Government led projects within the wider area including at Blackwattle Bay, Bays West and in Pyrmont. The City will continue to advocate for the appropriate provision of recreation facilities to support any significant residential density increases generated by these projects. This includes the future return of Wentworth Park to the community as public open space once the lease for greyhound racing expires in 2027.</p> <p>Recommended action: no change</p>
<p>There is no benefit to the local community in this proposal. The unzoning has created an enormous value uplift. Where is the VPA to share this with the community.</p>	<p>The proposed planning controls will enable the redevelopment of the site to:</p> <ul style="list-style-type: none"> - deliver a high-quality development which provides for increased social housing and private housing, as well as non-residential uses facing Wentworth Park - deliver local social, retail or commercial uses - deliver a built form which responds to the surrounding context including the adjacent MJ Doherty Reserve and recent development to the east of the site - protect the heritage values of the local area by retaining and protecting heritage street trees

	<ul style="list-style-type: none"> - retain the amenity of the surrounding residential uses by ensuring an adequate level of solar access and privacy is maintained - maintain the amenity of adjoining streets and parks by ensuring street trees are protected and ensuring no overshadowing of the adjacent parks - provide for enhanced passive surveillance and activation of the adjacent open space and public domain - provide for increased pedestrian priority and safety on surround streets, and - deliver a sustainable outcome through identification of sustainability targets. <p>The intended outcome is for the uplift to facilitate the redevelopment of the site to provide much more and better social housing, consistent with the City’s Local Strategic Planning Policy. The public benefit of the social housing and improved sustainability targets are secured through the planning controls rather than a voluntary planning agreement.</p> <p>Recommended action: no change</p>
<p>The reduction in social housing which will lead to mono-cultural gentrification.</p>	<p>The planning proposal facilitates an increase in social housing on site.</p> <p>Recommended action: no change</p>
<p>What constraints on the NSW Government who after accepting Councils support to increase height levels in exchange for social housing don’t sell off because they find it more valuable.</p>	<p>The additional height and floor space can only be achieved if the northern site is used for social housing. If the additional height and floor space is awarded under a development application a condition of consent will secure the social housing use.</p> <p>Promoting the delivery and maintenance of affordable housing is an object of the Environmental Planning and Assessment Act 1979 (the Act) under Section 1.3(d).</p> <p>Affordable housing under the Act includes social housing. Promoting the delivery and maintenance of social housing is therefore a first principle planning consideration.</p> <p>The City’s proposal as structured promotes:</p> <ul style="list-style-type: none"> - the delivery of social housing, by providing a Floor Space Ratio (FSR) incentive contingent on the delivery of social housing, and - the maintenance of social housing by securing the northern site for the purposes of social housing as a minimum. <p>For the long term operation of the land, the City’s proposed planning incentive provision promotes the maintenance of affordable housing on site in accordance with Act, whilst allowing redevelopment or disposal under the site’s substantive mapped FSR control, which remains unchanged by the planning proposal.</p> <p>Recommended action: no change</p>

<p>The proposal doesn't adequately address flooding.</p>	<p>Flood Assessment and Stormwater Assessment Reports identify the site is affected by the 1% Annual Exceedance Probability (AEP) flood level ranging from 3.27 to 3.88 metres AHD across the both sites and the Probable Maximum Flood (PMF) level ranging from 4.24 to 4.38 metres AHD across the both sites. Under existing conditions both north and south sites experience overland flooding on all sides. The majority of flow is north-east along Mitchell Lane East and Wentworth Park Road. It is noted that Wentworth Park has a 1 metre higher PMF level than the subject site.</p> <p>The flood assessment confirms that redevelopment of the site must be designed to meet the following flood planning levels:</p> <ul style="list-style-type: none"> - residential habitable rooms: 1% AEP flood level + 0.5m freeboard. - residential non-habitable rooms: 1% AEP flood level - below-ground car parks: the higher of 1% AEP flood level + 0.5m freeboard and PMF flood level. <p>The reference scheme submitted with this planning proposal has been informed by the above flood planning levels.</p> <p>To offset potential flooding impacts, mitigation measures will be required. This may include:</p> <ul style="list-style-type: none"> - A pit and pipe network to collect minor storm runoff from surface areas; - overland flow paths to carry major storms through and around the site without causing damage to property from flooding; and - two separate stormwater treatment chambers. <p>A detailed flood assessment will be required as part of subsequent development applications for the site.</p> <p>Recommended action: no change</p>
<p>The proposal doesn't adequately address privacy.</p>	<p>The reference scheme submitted with this planning proposal demonstrates adequate compliance with the privacy and separation controls of the NSW Government's Apartment Design Guide. Site-specific controls have also been included in the draft DCP to help guide the design for the block. The draft DCP controls will help to ensure the benefits of the increased maximum building height and FSR are realised and impacts are appropriately managed. The draft DCP addresses the visual privacy between apartments across Park Lane and manages visual privacy between apartments and terraces.</p> <p>Recommended action: no change</p>
<p>Sydney Water No objection and provision of servicing requirements.</p>	<p>Noted.</p> <p>Recommended action: no change</p>

<p>Heritage NSW</p> <p>No objection. Heritage NSW considers the proposal to be an acceptable approach from a heritage perspective.</p>	<p>Noted.</p> <p>Recommended action: no change</p>
<p>Transport for NSW</p> <p>No objection. Consideration should be given to including requirements for freight and service vehicle parking facilities on-site.</p>	<p>Noted.</p> <p>Recommended action: no change</p>
<p>Shelter NSW</p> <p>In general, Shelter NSW supports the development proposal however, Shelter NSW has provided some practical suggestions that we feel support or strengthen the housing-related priorities for existing and future residents of the Sydney LGA.</p>	<p>Noted.</p> <p>Recommended action: no change</p>
<p>Shelter NSW</p> <p>Shelter NSW is concerned with the accumulative impact of developments such as 17-31 Cowper Street Glebe. Our apprehensions are based on the site-by-site nature of these developments, which ignores the broader accumulative effect in terms of both social impact and the public housing deliverables outlined in the NSW Government’s Future Directions for Social Housing (2016) Strategies.</p>	<p>The provision of social housing is the responsibility of the NSW Government. This includes a responsibility to plan for, deliver and maintain housing appropriate to current and future tenants and ensure existing tenants are appropriately relocated and accommodated when sites are redeveloped.</p> <p>In absence of a holistic NSW Land and Housing Corporation strategy for the delivery of new and replacement affordable housing across the City of Sydney Local Government Area, the City and the NSW Government must take every opportunity to increase the provision of social and affordable rental housing in line with endorsed Council and NSW Government Policy.</p> <p>Recommended action: no change</p>

<p>Shelter NSW</p> <p>Shelter NSW notes that the tenant transfer processes connected with the current 5 projects in the City of Sydney LGA will be very disruptive to the lives of existing tenants, many of whom are vulnerable and may have already experienced a recent relocation from areas such as Millers Point, only to be moved on again.</p>	<p>The provision of social housing is the responsibility of the NSW Government. This includes a responsibility to plan for, deliver and maintain housing appropriate to current and future tenants and ensure existing tenants are appropriately relocated and accommodated when sites are redeveloped.</p> <p>Land and Housing have stated that a dedicated relocation team will work with individual tenants to negotiate relocation plans.</p> <p>Existing tenants will be offered a tenancy in the new social housing building should they express an interest, as part of the relocation planning process.</p> <p>As part of the relocation planning process for tenants, options to relocate to housing within their existing neighbourhood are discussed. Additionally, tenants will be offered a tenancy in the new social housing buildings should they express an interest.</p> <p>Recommended action: no change</p>																		
<p>Shelter NSW</p> <p>The loss of the existing dwellings on site has not been appropriately considered. Their loss represents a significant loss in public investment, where the existing dwellings are only 20 years old and represent a public investment of around \$5,700,000. The proposition that there is a financial benefit of 35 new public housing units doesn't take into account the 19 dwellings being lost, what is, in fact, being delivered is only an additional 16 dwellings.</p>	<p>What the existing dwellings represent in terms of value and past public investment is not a planning consideration. The decision whether to redevelop or renovate lies with the landowner who in this instance is the NSW Government.</p> <p>The City seeks to substantially increase the amount of affordable housing (both social and affordable rental housing) in the local government area at every opportunity. The proposal represents an opportunity to substantially increase the amount of social housing on site in line with Council and NSW Government policy.</p> <p>Recommended action: no change</p>																		
<p>Shelter NSW</p> <p>Shelter NSW believe that at a minimum the two studio apartments should become either 2- or 3-bedroom units and that the overall project should aim to deliver more 2- or 3-bedroom dwellings in the public housing</p>	<p>The apartment mix of the proposal will be determined at development application stage.</p> <p>The indicative scheme submitted in support of the proposal details the following apartment mix:</p> <table border="1" data-bbox="544 1787 1385 2000"> <thead> <tr> <th></th> <th>Studio</th> <th>1 Bed</th> <th>2 Bed</th> <th>3 Bed</th> <th>Total</th> </tr> </thead> <tbody> <tr> <th>North site</th> <td>2</td> <td>26</td> <td>7</td> <td>0</td> <td>35</td> </tr> <tr> <th>South site</th> <td>0</td> <td>14</td> <td>20</td> <td>5</td> <td>39</td> </tr> </tbody> </table>		Studio	1 Bed	2 Bed	3 Bed	Total	North site	2	26	7	0	35	South site	0	14	20	5	39
	Studio	1 Bed	2 Bed	3 Bed	Total														
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component of the proposal.	Total	2 (3%)	40 (54%)	27 (36%)	5 (7%)	74 (100%)													
	<p>The provision of social housing is the responsibility of the NSW Government. This includes a responsibility to plan for, deliver and maintain housing appropriate to current and future tenants. Land and Housing Corporation have justified the proposed apartment mix stating that it reflects social housing needs for the area.</p> <p>The waitlist demand for the City of Sydney is skewed towards smaller dwellings (Source: NSW Land and Housing Corporation):</p> <table border="1"> <thead> <tr> <th>Bedrooms</th> <th>% of waitlist</th> </tr> </thead> <tbody> <tr> <td>Studios</td> <td>44%</td> </tr> <tr> <td>1 bed</td> <td>30%</td> </tr> <tr> <td>2 bed</td> <td>17%</td> </tr> <tr> <td>3 bed</td> <td>4%</td> </tr> <tr> <td>4+ beds</td> <td>3%</td> </tr> <tr> <td>Blank</td> <td>1%</td> </tr> </tbody> </table> <p>Recommended action: no change</p>						Bedrooms	% of waitlist	Studios	44%	1 bed	30%	2 bed	17%	3 bed	4%	4+ beds	3%	Blank
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