

24 October 2022

Manager  
Planning Assessment  
City of Sydney  
Town Hall House  
456 Kent Street  
Sydney NSW 2000

by email to [dasubmissions@cityofsydney.nsw.gov.au](mailto:dasubmissions@cityofsydney.nsw.gov.au)

Attention: Joe Wang

Dear Mr Wang

Section 4.55(2) Application D/2019/1470A  
274-276 Glebe Point Road Glebe 2037

Dear Mr Wang

The Glebe Society Inc (TGSI) makes this submission on behalf of its 400 members and the broader local community, who hold very concerned views about the future of this building (RJ Williams Lodge).

That concern was demonstrated by the 107 community submissions to Council in response to the original DA – D/2019/1470.

Notwithstanding the approval of the DA, strong views are still held regarding the building's usage, the amenity that it offers its residents and the community, as well as the compatibility of the building with the local character, whilst simultaneously offering needed affordable housing.

TGSI is of the view that the DA approval and the conditions attached to it did not go far enough in satisfying these criteria.

TGSI also recognises the two significant changes that have occurred since the DA approval. COVID has changed people's priorities and the way they wish to live, and a new housing code, the State Environmental Planning Policy (Housing) 2021 has been introduced.

Both are important considerations to this new Application.

## USAGE AND AMENITY FOR RESIDENTS

To its credit, the Applicant (Wesley) has realised that the intensity of small studio accommodation is no longer appealing to the needs of the majority of people seeking affordable housing in Glebe.

The reduction from 100 to 77 bedrooms (excluding the live in Manager), the majority of which are in clusters, is far more conducive to the wellbeing of the residents, providing for better social interaction of a mixed demographic, ranging from singles to families.

Within the new Plan of Management, Wesley nominates that of the 42 "Dwelling Types" (page 6), 30 are targeted to families, with the balance targeting singles and couples.

The new floor plans suggest the building is now far more attractive to senior singles and couples wishing to stay within their local community, enjoyably living amongst families.

### Children's Play Area

The provision of a children's play area on the level 3 roof will enhance the attractiveness of the building to families, however it should be accommodated within an appropriate Green Roof as opposed to a synthetic grass floor. A DA condition that requires the play equipment to be identified and included within the Construction Certificate, and the installation be completed before the issue of the Occupation Certificate would be appropriate.

### Car Parking

Wesley has sought to reduce the total onsite car parking from 8 to 7. The DA conditions stipulate a total of 8 cars spaces and their specific allocation.

Of the 8, the DA condition requires that 5 are to be shared amongst residents. Wesley now seeks to reduce this to 4.

Both Wesley and Council have discriminated against the residents in that they suggest that the live in Manager can only travel to work by car and therefore needs a dedicated car park, presumably for his or her personal safety and security. However, the majority of residents will be required to find an on street car park somewhere in the area, near or far, at risk to their personal safety and security.

Both need to travel to their place of work. However, families also need to deliver children to school, sporting events, visit doctors etc. Mobility for active seniors also supports their mental wellbeing.

The provision of 4 or 5 shared resident's car spaces is unworkable. It will lead to provocation amongst residents, jostling with each other to park in one of the spaces.

Wesley seeks to provide an EV charger for use by all resident car drivers but locates it within the staff (Manager's) allocated car space. Commendable in that an EV

Whilst not advocating a car space for all, the SEPP (Housing) 2021 offers a far more pragmatic and environmentally considered response with the non-discretionary control of 0.2 car spaces per room. Clause 24 applies the non discretionary standards which includes sub clause (2)(i), which reads:

In this instance, this control provides for at least 15 shared resident spaces plus one for the Manager.

RJ Williams lodge is located within the Glebe Point Road Heritage Conservation Area No C29 and is classified as "detracting" to that conservation area on the Buildings Contributions Map of the City of Sydney Development Control Plan 2012 (DCP).



RJ Williams is located within the immediate proximity of the following locally listed heritage items as identified in the City of Sydney Local Environmental Plan 2012 (LEP):

272 Glebe Point Road, Glebe	Item 1756
278 Glebe Point Road, Glebe	Item 1757
280-286 Glebe Point Road, Glebe	Item 1758
431 Glebe Point Road, Glebe	Item 1773

433 Glebe Point Road, Glebe  
433-435 Glebe Point Road, Glebe

Item 1774  
Item 1775

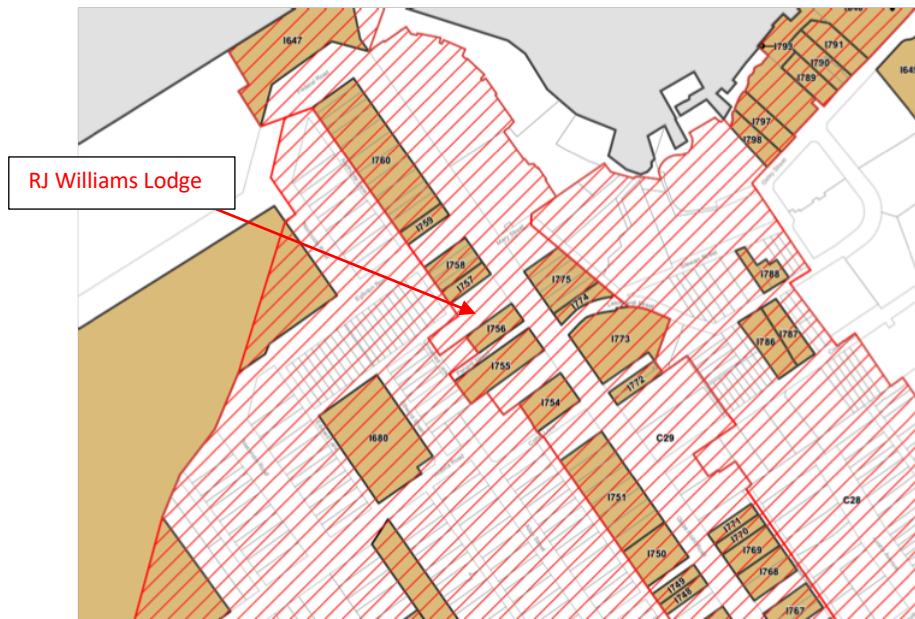


Fig 2. Heritage Map highlighting the intensity of the many locally listed heritage Items

RJ Williams is located within the Toxteth Locality Statement area as described in the DCP. The Statement reads:

*The neighbourhood is characterised with a combination of consistent elements including building scale, front and side setbacks, wall and roof forms and mature planting in both the private and public domain which will be protected and enhanced.*

A key principle is:

*Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.*

RJ Williams is immediately opposite the Glebe Point Locality Statement area as described in the DCP. That Statement reads:

*The precinct supports a diverse scale and type of built form, with a focus on enhanced landscaping to unify streetscapes and mitigate the scale of larger buildings.*

Two key principles are:

*Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.*

and

*Retain and enhance the heritage character of the area.*

Clause 25 (2) of SEPP (Housing) 2021 states:

*Development consent must not be granted under this Division unless the consent authority considers whether—*

- (a) the design of the boarding house will be compatible with—*
- (i) the desirable elements of the character of the local area,*

In approving the DA, Council stated in the Notice of Determination dated 1 July 2020 that:

*(E) The development is compatible with the character of the Toxteth locality and the Toxteth Heritage Conservation Area.*

*(G) The development accords with objectives of relevant planning controls.*

The site is however located within the Glebe Point Road HCA and in any case it would not be unreasonable for the assessment be professionally challenged to the contrary.

Again, to its credit Wesley has now sought to respond to a desirable element of the character via vertical landscaping. Unfortunately, it does not go far enough.

The Recommended Management policies within the Glebe Point Heritage Conservation Area Inventory Assessment Report, with respect to ENHANCE SIGNIFICANCE states:

*(a) Redevelopment of detracting sites... Encourage screening (landscape and architectural) to flat by appropriate policy*



Fig 3 and 4. Vertical landscaping proposed by Wesley

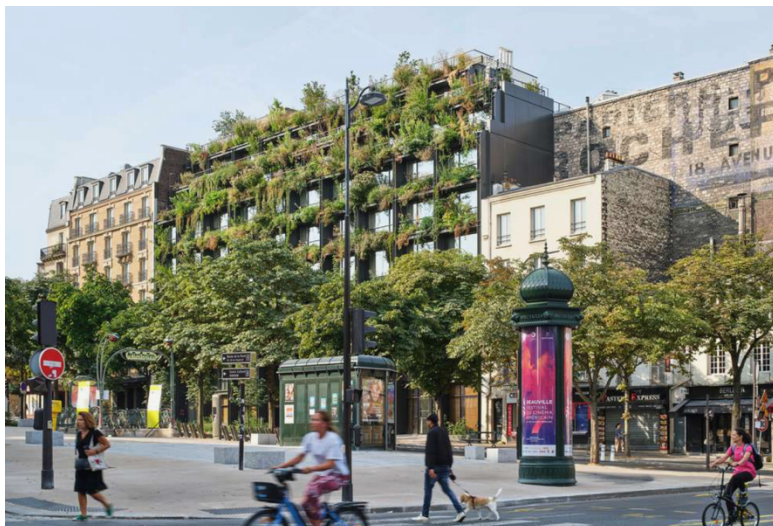


Fig 5. A Parisian example of the use of vertical landscaping (living green walls) to be compatible with the heritage character of the surrounding buildings at this location.  
PHOTO [www.treehugger.com](http://www.treehugger.com)

The advantages are architecturally, aesthetically and environmentally positive.

A nearby example is Central Park, Broadway.



Figures 3 and 4 above reflect the amendments submitted by Wesley, and whilst a step in the right direction, figure 5 reflects a far superior outcome where intrusive and detracting architecture uses vertical landscaping to provide compatibility with the desirable heritage character of this Parisian area.

A similar outcome for the Glebe Point Road elevation in particular would substantially ensure that the redevelopment's compatibility with the desirable character of the Glebe Point and Toxteth localities.

### ENVIRONMENTAL AMENITY

In addition to providing significant compatibility elements to the desirable character of the local area, vertical landscaping (ie Green Facades or Living Green Walls) provide substantial environmental benefits.

Councils own "Green Roofs and Walls Policy and Implementation Plan" (view link <https://www.cityofsydney.nsw.gov.au/environmental-support-funding/green-roofs-and-walls>;) highlights those benefits and states:

*Green roofs and green walls are one of the few building technologies that provide multiple social, environmental and economic benefits. They are used around the world as an important climate change adaptation tool.*

*The City of Sydney recognises the significant benefits green roofs and walls can provide our city. Incorporating plants into building design creates a city that is more beautiful, liveable and resilient to a changing climate.*

Section 5 of Council's Conditions of Approval dated 1 July 2020 required design modifications to the roof, specifically:

*(b) The photovoltaic panels should be condensed in area and increased in number, determined based on the area of the roof and expert advice.*

*(d) Structural details are to be provided incorporating a solution providing support to the existing roof enabling the additional load of the roof-top landscaping to be accommodated. The solution must ensure the floor to ceiling height to the boarding rooms below continue to comply with the BCA for floor to ceiling heights. Details must include the existing slab thickness, depth of the beams below and the depth of the strengthening above.*

*(e) An engineer's report is to be provided detailing the existing capacity of Level 3 drainage outlets, advise adequacy of slab falls and outlets or provide an amended stormwater design for drainage of the roof-top.*

Clause 16 of Council's Conditions of Approval required the provision of a detailed green roof design, specifically:

*(b) A detailed green roof design including plans and details drawn to scale, and technical specification, by a registered landscape architect or qualified landscape designer, must be submitted to and approved by Council's Area Coordinator Planning Assessments/Area Planning Manager prior to the issue of a Construction Certificate. These documents must include:*

There are 8 subclause conditions that are to be satisfied, particularly the following:

(ii) Location and details of existing and proposed services, walls, balustrades, hard surfaces, furniture, screens and shade structures, fixings and other structural elements that may interrupt waterproofing, including cross-sectional details of all components.

(iii) Engineers report confirming structural capacity of building for proposed roof terrace loads.

(v) Details of drainage and irrigation systems, including overflow provisions and water retention cells in the drainage layer.

Wesley and its consultants have not satisfactorily responded to these conditions. The area allocated for urban farms has been reduced and replaced with hard surfaces including a synthetic grassed children's playing surface, a BBQ with alfresco dining and a sun lounge.

It would appear there is little recognition of the essential elements of a Green Roof.

The Green Roof Resource Manual is attached to the City of Sydney's website via the following link:

[https://www.cityofsydney.nsw.gov.au/environmental-support-funding/green-roofs-and-walls:](https://www.cityofsydney.nsw.gov.au/environmental-support-funding/green-roofs-and-walls)

That Manual describes a Green Roof as follows:

#### 1.1 What is a Green Roof?

A green roof has a dual function; it is a roof system designed to promote the growth of various forms of vegetation on the top of buildings. It is also designed to support various forms of renewable energy and water collection technology to assist in supplying power and water to the occupants of the building. Although a green roof is only one element of a building, it is extremely important when considering the long-term sustainability of our buildings and their impact on the environment.

The environmental advantages of installing green roofs are widely known and *include: thermal insulation, increasing the life span of the roof structure, minimising surface run-off, reducing the cities heat-island effect, producing renewable/no emissions energy which is fed into the electricity grid, collecting and supplying rainwater to minimise the burden on town water and reducing emissions through minimising the need for heating and cooling. There are many more advantages associated with installing a green roof and these will be discussed later.*

Every green roof has a series of components that aid in either protecting the building, assisting the growth of vegetation, collecting/harvesting rainwater or generating energy. These components include, a root protection layer, waterproof membrane, drainage water tanks.

#### 1.2 How is a green roof different to a roof garden?

Green roofs are distinct from traditional rooftop gardens because they promote proven sustainable concepts. Typically rooftop gardens have been purely an aesthetic feature of a buildings 'roofscape'.

Whilst Green roofs still pay attention to aesthetic considerations, their main objective is to minimise the buildings impact on the environment in an economically viable way. Green roofs maximize the potential of having vegetation on the roof by collecting and harvesting stormwater via a well designed drainage system and the use of materials that have been specifically developed to significantly minimise the waste of any valuable resource such as water. Additionally, green roofs take advantage of the relatively cooler environment by supporting photovoltaic cells (PV) which operate more efficiently in cooler environments.

The same document details the advantages of Green Roofs being:

- Visual public amenity and aesthetics
- Economic – infrastructure protection, food production, heating and cooling costs
- Environmental – increased biodiversity, improved efficiency of the PV cells, water run off management, improved air quality, reduction in noise pollution, reduction of the fire risk and a reduced Heat Island effect

Based on the plans submitted, Wesley only proposes a Roof Garden.

The Structural Engineer's Report makes no comment in relation to a Green Roof, be it an Intensive or Extensive Green Roof and the required structural modifications to install either option, or a hybrid of both.

The following imagery should be indicative of the DA condition for a Green Roof.



Fig 6 Courtesy [www.theconversation.com/greeningourcities](http://www.theconversation.com/greeningourcities)



Fig 7 Courtesy [www.worldgreeninfrastructurenetwork.org](http://www.worldgreeninfrastructurenetwork.org)

## RECOMMENDATIONS

- Council approves the Wesley proposal to reduce the bedroom numbers from 100 to 77 (plus one for the Manager) and in the cluster format submitted
- Council recognises the social benefits of a superior demographic mix that includes more families and provides balance to the residential amenity for more families by adopting the provisions of the non - discretionary car parking control contained in SEPP (Housing) 2021
- Council strengthens the external design conditions attached to the amended proposal so that the proposal is compatible with the desirable character of the locality, whilst providing environment benefits
- Council requires full compliance with the DA conditions in relation to the provision of an environmentally effective Green Roof

Yours faithfully

Ian Stephenson

PRESIDENT