



Your ref: SSD-12618001

By e-Submission
Planning Portal

30 May 2022

Confidential

Minoshi Weerasinghe
Senior Planning Officer - Industry Key Sites
Department of Planning & Environment

Dear All

Response to Request for Advice – 104-116 Regent Street, Redfern – Student Accommodation (SSD-12618001)

This letter has been written in response to the Request for Advice Letter dated 2 March 2022 from the City of Sydney (SSD-12618001).

WSP was commissioned by Wee Hur Redfern Trust to undertake a Crime Prevention Through Environmental Design (CPTED) assessment to which was submitted to support the proposed State Significant Development Application (SSD-12618001).

SSD-12618001 is for a student housing development at 104-116 Regent Street, Redfern, (the Site) within the City of Sydney Local Government Area (LGA). In response to the City of Sydney's comments design amendments have been made to the proposal.

Please see our comments on *Section 1. Urban Design e. Active Frontages* on the following page within **Table 1**.

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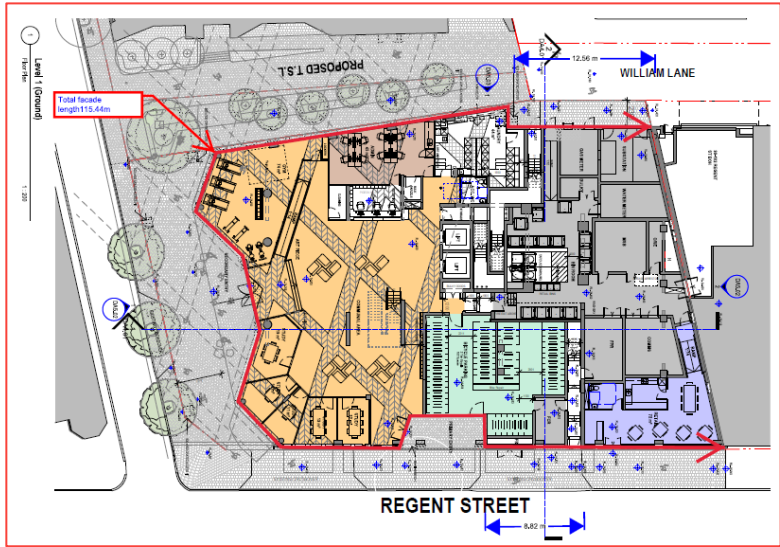
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Table 1 Response to Request for Advice

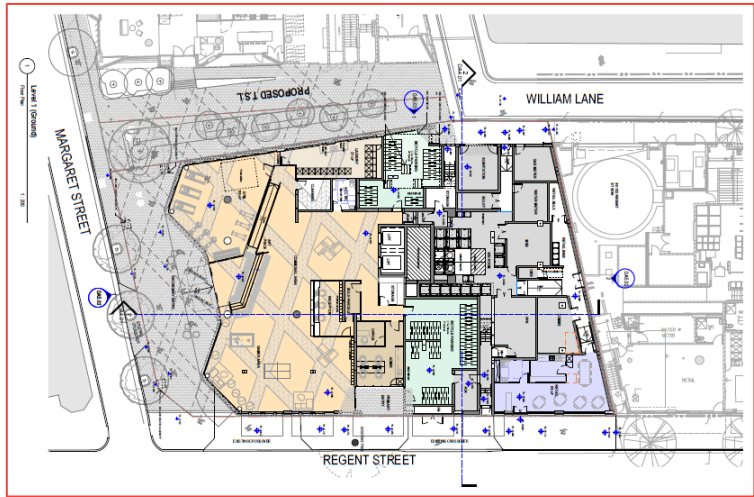
City of Sydney Matter	Design Amendments	Response
<p><i>e. Active Frontages</i></p> <p><i>The proposed development has frontages to Regent and Margaret Streets as well as the future through site link and provides opportunities for street activation. However, the development does not provide a genuine active frontage with good levels of passive surveillance.</i></p>	<p>Figure 1 and Figure 2 are used to make a comparison to show how the ground level floor plan has been redesigned to address the City of Sydney’s comments.</p> <p>The usage of the area on the corner of Regent Street and Margaret Street has been changed from study rooms to an open plan games area that will greatly increase usage of the space providing further active frontage to the street and increased passive surveillance.</p> <p>Adjacent to the entrance on Regent Street the façade has been redesigned to removal any areas of possible concealment or entrapment.</p> <p>Bicycle parking has been split and additional area is being utilized as office space facing the street to improved street activation.</p>	<p>WSP do not agree with this sentiment from Council. According to the Sydney Development Control Plan 2012:</p> <p>Active Frontage means street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. Frequent building entries that face and open towards the street, transparent street frontages, quality materials and refined details, and mixed land uses will make streets more diverse and attractive for pedestrians and increase the perception of safety and encourage higher levels of pedestrian activity.</p> <p>There is a total of 115.44m of building and street frontage, of which vast majority of is activated through retail space (mixed land uses), glass, natural surveillance and building entries.</p> <p>This allows for the ground floor of the development to provide active visual engagement between street pedestrians and those within the building. The proposal provides building entries along Regent Street and Margaret Street activating these frontages with high pedestrian activity. Where appropriate transparent street frontages have been provided with high quality materials and details provided, this allows the pedestrians and occupants to see in and out of the building providing a high level of activation.</p> <p>A retail/café space has been provided along the Regent Street greatly activating the streetscape for pedestrians and their safety and greatly reducing any CPTED issues. Further lighting and well-placed CCTV, and clear be considered at the detailed design stages mitigating any safety concerns.</p> <p>It is therefore considered that that proposal is provides a genuine active frontage with good levels of passive surveillance. See Figure 2 which illustrates the amount of activated frontage provided by the proposal.</p>

Figure 1 Ground Floor old design – Active Frontage



Source: Antoniades Architects to support this document

Figure 2 Ground Floor new design – Active Frontage



Source: Antoniades Architects to support this document

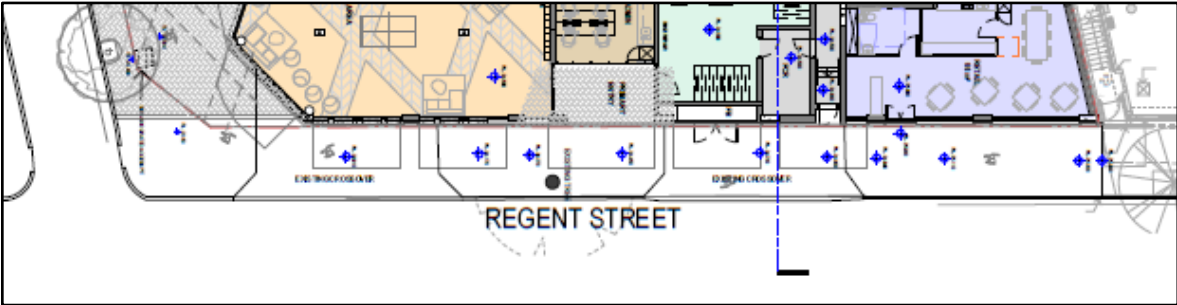
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City of Sydney Matter	Design Amendments	Response
<p>“The Regent Street entry provides minimal passive surveillance as a result of the location of the bicycle parking facilities that occupy the majority of frontage. It presents areas of concealment with Crime Prevention Through Environmental Design (CPTED) concerns for both residents and the public.”</p>	<p>Adjacent to the entrance on Regent Street the façade has been redesigned to removal any areas of possible concealment or entrapment.</p> <p>Bicycle parking has been split and additional area is being utilized as office space facing the street to improved street activation.</p>	<p>The bicycle parking does not represent a majority (more than 50%) of the street frontage and has been split and reconfigured, it constitutes less than 10 metres of the regent Street Frontage which is less than the perceived “majority”, see Figure 3.</p> <p>The Regent Street entry provides direct passive surveillance and sight lines into and out of the building onto Regent Street as outlined within Figure 4. The areas within the building are highly activated with the addition open plan games room and will maintain and increase passive surveillance. As an entry space this area will be used by residents greatly activating this space.</p> <p>The entry area and bicycle parking area will be well lit, includes a skylight, uses clear materials, and will include CCTV at the detailed design stages this will allow the Entry Space to be free for opportunities for concealment for members of the public utilising Regent Street.</p> <p>The Regent Street entry provides natural surveillance and direct sight lines into and out of the building into Regent Street in accordance with the CPTED Principles for Natural Surveillance.</p>

Figure 3Regent Street Frontage



Source: Antoniades Architects

Figure 4Regent Street Frontage



Source: Antoniades Architects

City of Sydney Matter	Design Amendments	Response
<p>The Margaret Street facade includes a recessed secondary entry, which sits in an under croft of the podium. This fails to positively reinforce the street edge, would receive no natural light due to its orientation, and creates CPTED concerns for both residents and the public.”</p>	<p>The skylights proposed in the slab above the entry will provided an increased amount of natural light and give the feeling of perceived surveillance to anyone on the street in front of the entrance.</p>	<p>The Margaret Street Entry has been designed to be short and obtuse in recess. The Entry provides a positive street edge element which would result in street activation and the maximising of passive surveillance into and out of the building onto Margaret Street as indicated in Figure 5.</p> <p>The entire façade has been designed with a ‘permeable edge’, which will increase the sense of being seen from within the building and seeing out of the building. This allows for the upper levels of the podium to see out of the building onto Margaret Street.</p> <p>The Entry way includes external widows that are transparent in material which provide adequate passive surveillance into Margaret Street.</p> <p>Overall, the Margaret Street Entry provides a great level of street activation as an entry point with a high level of passive surveillance in accordance with the Principles of CPTED.</p> <p>The entry way will include suitable lighting and CCTV at the detailed design stage to minimise any potential CPTED issues or concerns for residents and members of the public.</p> <p>Overall, the proposal has sought to minimise any CPTED concerns at this stage.</p>

Figure 5Margaret Street Entry



Source: Architectural Plans, Antoniades Architects



In summary the proposal has been well considered from a CPTED perspective. The detailed design stages of the development will ensure that CPTED principles are implemented and maintained for the ongoing operation of the development.

We see the above noted mitigating measures as sufficient to addressing the relevant sections within the Request for Advice – 104-116 Regent Street, Redfern – Student Accommodation (SSD-12618001).

Yours sincerely

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Lawrence Fowle
Graduate, Planning and Places

A handwritten signature in black ink, appearing to be 'C Sangkuhl', written over a light blue rectangular background.

Callum Sangkuhl
Associate, Planning and Places

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