

Re: Objection to SSD-70066710 – Hudson Vine Mixed Use Redevelopment

From: Fran Tracey

Date: 1 May 2025

Dear Thomas,

Thank you for the opportunity to comment on the proposed Hudson Vine Mixed Use Redevelopment (SSD-70066710).

I strongly object to the application based on the following core concerns:

1. Excessive Overshadowing of Neighbouring Properties

The proposal fails to comply with several planning instruments, including the State Environmental Planning Policy (Housing) 2021, the Apartment Design Guide (ADG), the SEARs, and the Redfern-Waterloo Built Environment Plan (BEP1). Key issues include:

- **Non-compliance with SEARs:** The Environmental Impact Statement (EIS) omits required shadow analysis comparing existing and proposed conditions.
- **Breach of BEP1:** A stated objective of BEP1 is to maintain solar access to southern properties by limiting Vine Street development to three storeys. The proposed design does not achieve this.
- **ADG Contraventions:** The proposal ignores design principles requiring minimisation of overshadowing and greater separation or setbacks where significant impacts occur.
- **Housing SEPP Principle Violations:** The design undermines residential amenity, particularly natural light and thermal comfort, as outlined in both legislative design principles and court planning precedents.

Summary: The development would vastly reduce solar access to my terrace on Vine Street, and also my neighbours terraces by up to 66% during key daylight hours, degrading the habitability and sustainability of our homes.

2. Inappropriate Height, Bulk, and Scale

The building significantly exceeds the permissible height, reaching almost 23 metres where 15 metres would be sufficient for a compliant five-storey structure.

- **Contrary to BEP1 and ADG Intent:** The height does not transition appropriately and fails to respond to surrounding heritage and low-scale buildings.
- **Fails Veloshin v Randwick Council Principles:** The design's impacts exceed what could be reasonably expected from planning controls.
- **Non-conforming Streetscape:** The proposed height dwarfs adjacent buildings by up to five storeys, disrupting the area's scale and character.

I support the detailed submission by Jason Leong 25 Vine Street dated 30 April 2025 refer pages 12-18 (including the excerpt below)

In contrast, the height of the proposed building contradicts the aims of height controls. This can be seen in Short Section A:⁴³

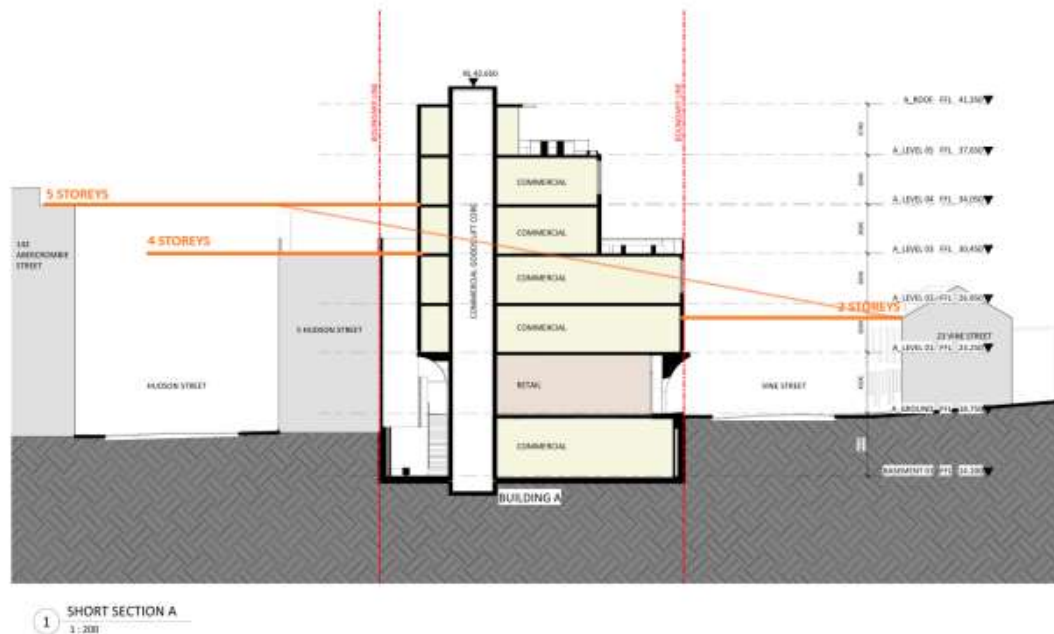


Figure 10 Short Section A (with additional notes in orange)

Additional notes have been added in orange, highlighting:

- 2 storeys of the proposed building already exceed the height of the 2 storey terraces at 23 Vine Street
- 3 storeys of the proposed building match the height of the 4-storey mixed use building at 5 Hudson Street
- 4 storeys of the proposed building match the height of the 5-storey residential building at 142 Abercrombie Street
- A building with a responsive design should follow the diagonal line from 5 storeys to 2 storeys

Considering the scale of the surrounding buildings, the proposed building matches the size of a 7-storey development. In contrast to the ADG height controls example, the proposed building exceeds the height of the immediately adjacent building (5 Hudson St), plus both buildings on the other sides of the road (23 Vine Street and 142 Abercrombie Street). Due to most of the surrounding buildings falling within the Darlington Heritage Conservation Area, it is unlikely that their height will change.

Summary: The excessive height results in disproportionate overshadowing and a jarring streetscape that is out of step with the established urban fabric.

3. Visual Impact

Incomplete Assessment: Key viewpoints were omitted in the visual impact analysis, preventing a full understanding of the development's visual consequences. (Refer detailed submission, Jason Leong 25 Vine Street dated 30 April 2025 19-22.)

Loss of Sky Views: First-floor residents along Vine and Abercrombie Streets will lose views of the sky—an important amenity for urban dwellers.

Summary: The visual bulk of the development, combined with incomplete assessment, conceals the true extent of impact on the public realm and residential outlook.

4. Privacy Intrusion

- **Direct Overlooking:** The placement of balconies and windows enables views into private open spaces and bedrooms of neighbouring properties.



Directly across the road from 2-16 Vine Street Redfern,

- **Insufficient Mitigation Measures:** No evidence is provided of meaningful design responses (e.g., screens, setbacks, vegetation).

Summary: The proposal compromises the privacy of surrounding residents and fails to adopt reasonable design interventions.

5. Clause 16A Variation Request Is Unjustified

The variation request to exceed height limits lacks adequate justification:

- **Factually Incorrect Statements:** The request falsely claims no adverse solar impacts and that the height is consistent with surrounding development.
- **Failure to Meet the Wehbe Test:** The variation does not demonstrate that objectives are achieved despite non-compliance.
- **Inadequate Planning Grounds:** Claims of public benefit or context-sensitive design are generic, unsupported, and inconsistent with judicial expectations (e.g., *Four2Five* and *Initial Action*).

Summary: The variation relies on misleading claims and fails to demonstrate that strict compliance with planning controls is either unreasonable or unnecessary.

6. Recommendations

To meet policy requirements and serve the public interest, the following changes are recommended:

- Scale the building to conform with height controls (5-storey on Hudson St; 3-storey on Vine St).
- Increase upper-level setbacks to minimise overshadowing.
- Remove or obscure windows and balconies that compromise neighbouring privacy.
- Conduct a complete visual impact analysis from key street-level perspectives.
- Revise the Clause 16A variation request to reflect site-specific constraints rather than generalised benefits.
- Consider compliant alternatives using adjusted floor-to-ceiling heights or reconfigured layouts.
- Respect heritage values and integrate better with the Darlington Conservation Area.

(I support the detailed submission by Jason Leong 25 Vine Street dated 30 April 2025 and its recommendations.)

7. Conclusion

Whilst it is referred to as the Hudson Vine Mixed Use Redevelopment, approximately eighty per cent of the land has a direct relationship to Vine Street; and the Abercrombie Street buildings that back onto Evans Lane. with the remaining 20 percent having a direct relationship to Hudson Street. Therefore the majority of the site should be to a maximum height of 3 storeys with the remainder at the same height as 5 Hudson Street.

PLAN LAYOUT 1: 1:1000 (NOT SHOWN ON THE PRINTOUT BUT IS CONTAINED WITHIN THE AUTOCAD FILE)



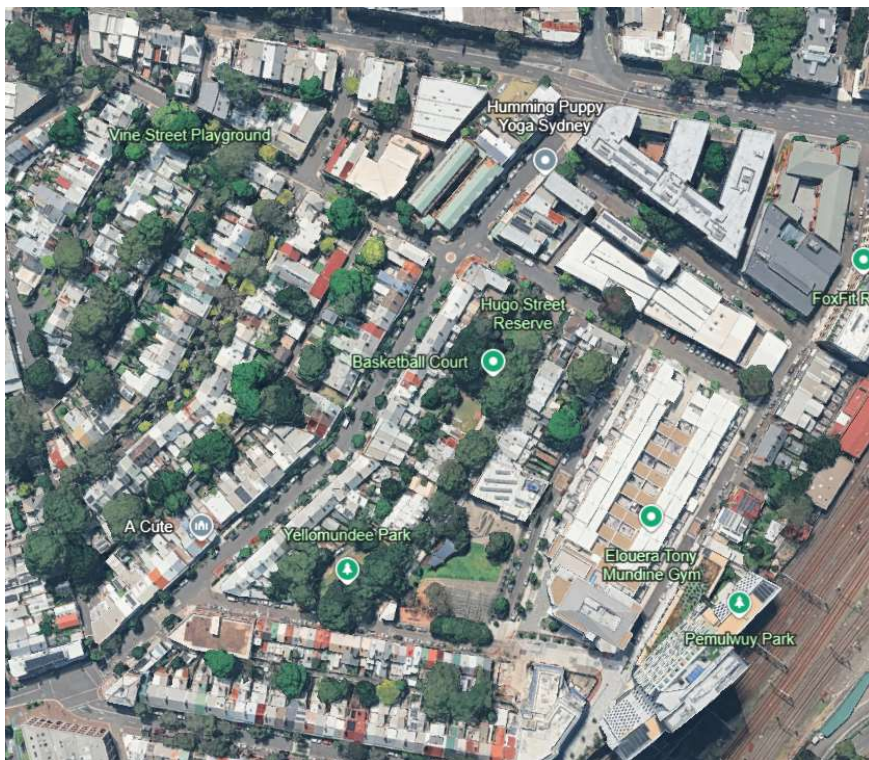
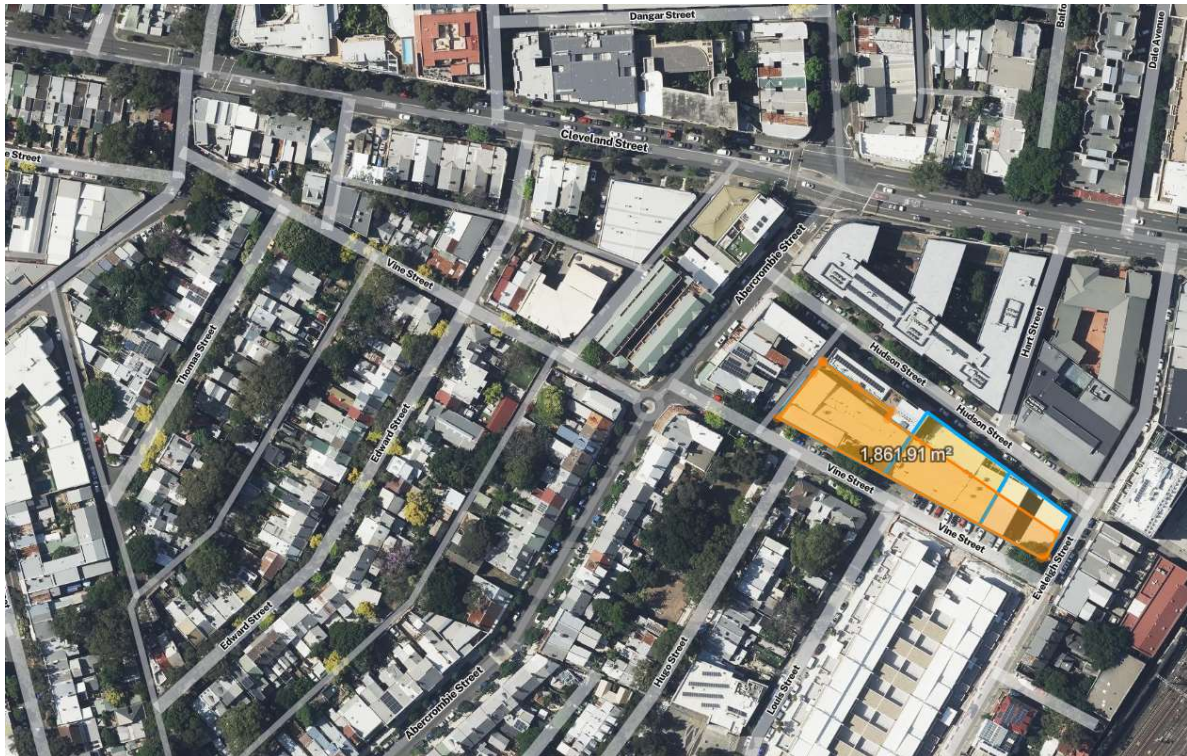
The survey within the submission confirms the site is surround by 2-storey and three storey building on 3 sides.

The Survey omits to contour/gradient survey in relation to site and surrounding area for perspective.



The site is surrounded on three sides with two and three storey buildings; with neighbouring terraces listed as Darlington Significance: Local Heritage sites.

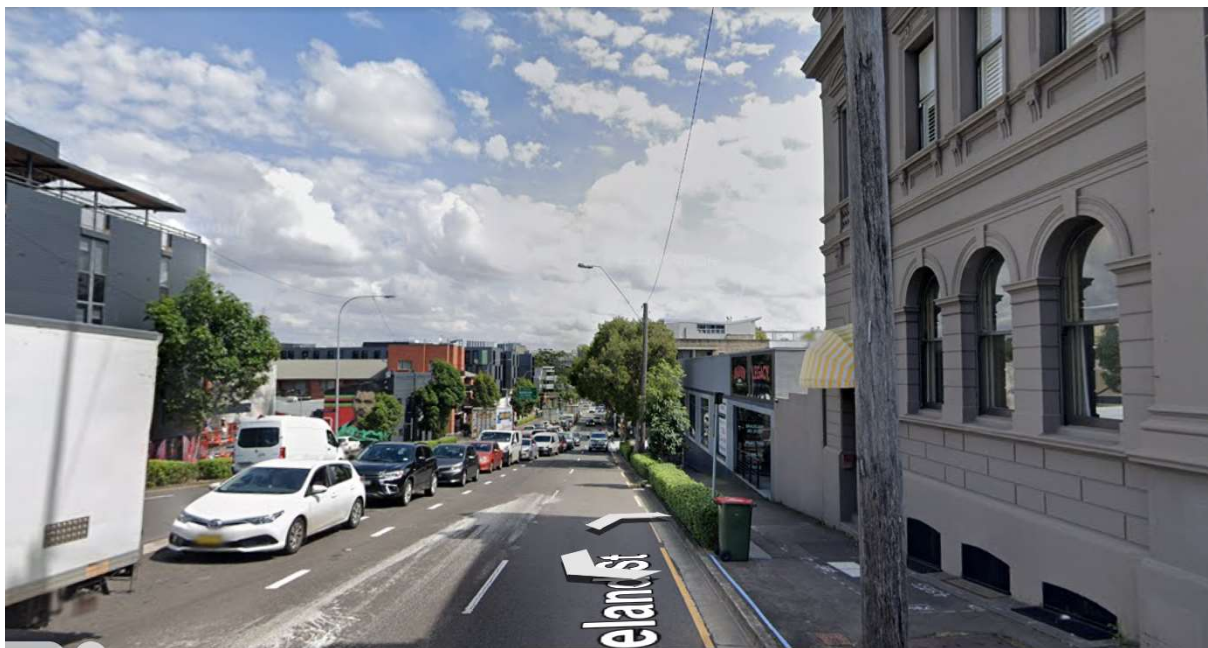
The site is not between Cleveland and Hudson Street with the MU1 sites flow down the hill, with the low point being near the corner of Beaumont & Cleveland Street. Its between Vine and Hudson which needs to be assessed based on Abercrombie and Vine Streets building heights.



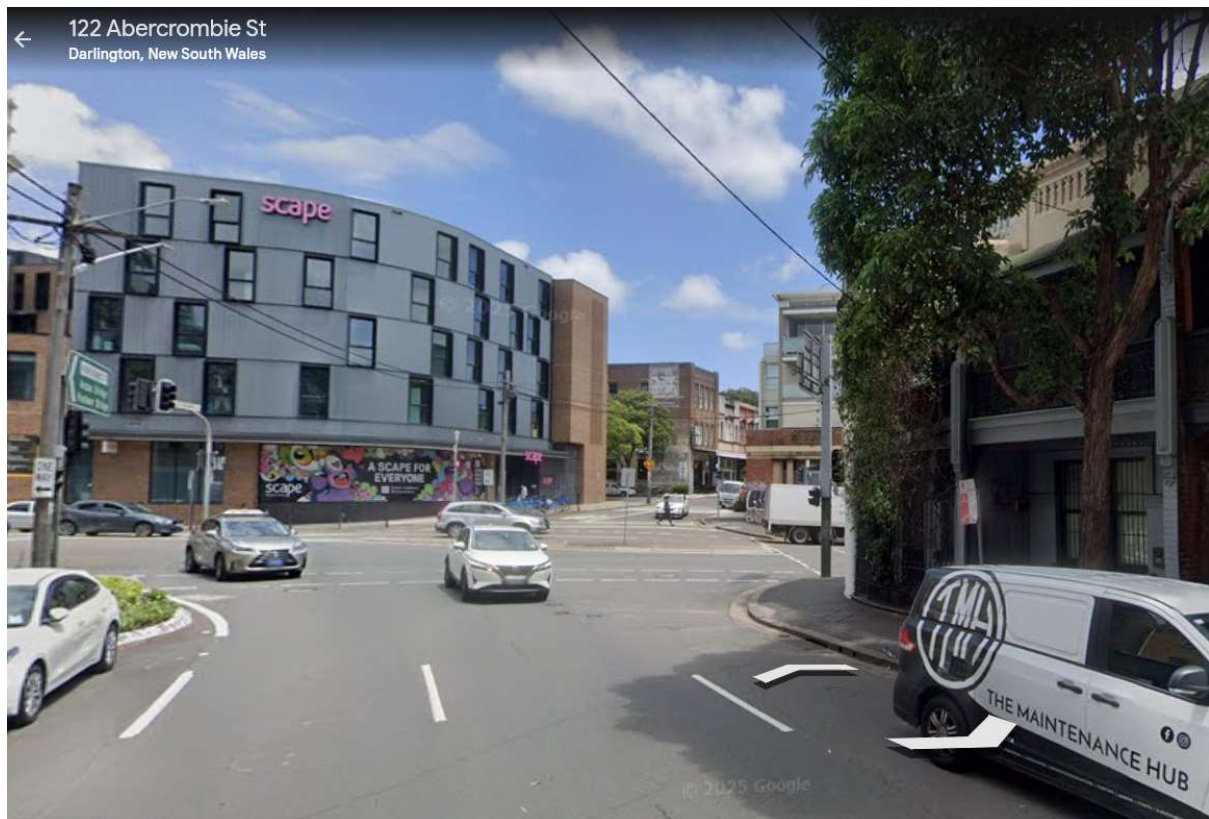
Pre-dominantly 2-storey development surrounding site.



Looking down the hill from intersection of Cleveland and Regent Streets.



Further down the hill towards Scape (corner Abercrombie & Cleveland Streets).



Corner of Cleveland & Abercrombie Streets Scape building to the 3-storey development across at 153A Cleveland Street (The gradient of is continuing to go down Cleveland, as is for Abercrombie Streets.

The **Hudson Vine Mixed Use Redevelopment** will protrude above the Scape building.



Units on the right-hand side of Cleveland street heading towards City Road.

The proposal in its current form should be refused.

It disregards key planning controls, imposes severe amenity impacts on neighbours, and lacks design sensitivity for a low-rise, and a heritage-rich neighbourhood. Approval would undermine long-standing planning principles in favour of excessive yield, setting a dangerous precedent for future developments.

I have provided locale photos that demonstrate the current built form at 2-14 & 16-30 Vine Street and 32-34 Eveleigh Street, Redfern as the proposal did not demonstrate how the current building interrelates currently within the neighbourhood, and omitted to demonstrate the major impacts to the location in its current form.

The current proposal, **SSD-70066710 – Hudson Vine Mixed Use Redevelopment** should not exceed the height limits of its neighbouring property at the rear, 5 Hudson Street Redfern.

I would also like to note that with 700-900 people potentially coming into the area the streets and parking are ill equipped to meet any further demand. The paltry number of car spaces and the redevelopment needs to be rejected in its current form.

Whilst Council and Planning may espouse it is close to Redfern Station and people can commute by public transport, being a long-term resident I can attest that people drive into Redfern to park to attend activities in Sydney City. A number of the current tenants and visitors to the site drive in either to attend work, or to attend art exhibitions etc at the current premises of 2 -14 and 16-30 Vine Streets making it difficult for residents to park on returning from appointments, or the supermarket with the car laden with groceries and not being able to park reasonably close to unload the vehicle.

Thank you for considering this submission.

Sincerely,

Fran Tracey

13 Vine Street
Redfern NSW 2016

References:

Jason Leong 25 Vine Street submission dated 30 April 2025

Photos, Fran Tracey 01/05/2025

Sixmaps

Google earth

Location Photos for the Hudson Vine Mixed Use Redevelopment



Looking down the hill corner Louis & Caroline Streets. 25 Vine Street at bottom (yellow) with view of 2-14 Vine Street (black building) visible.



Current building 2-14 Vine Street (black building) through to Everleigh Street from the corner of Vine & Louis Steet



13 – 25 Vine Street between Louis and Hugo Streets and across from 16 Vine Street.



View diagonally across from 16 Vine Street looking up hill of Louis Street, and across to Everleigh with 2 storey buildings. Scape in the distance that borders the train line on the top of Everleigh.

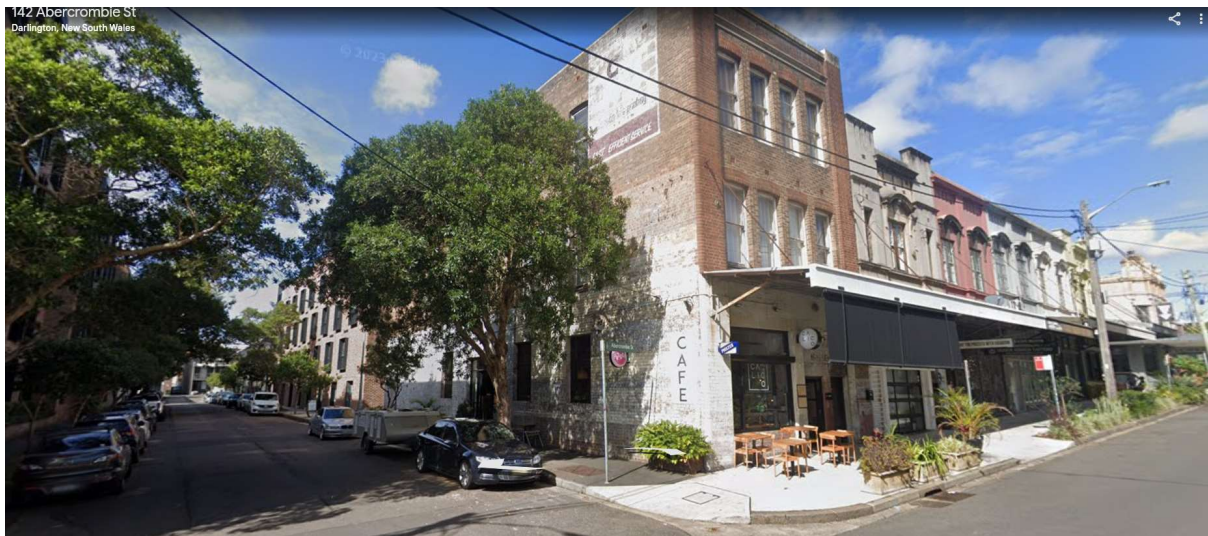


25 – 13 Vine Street from 2 Vine Street (Hugo & Vine Street).



Evans Lane view of 30 - 16 Vine Street in relation to built-form behind at 5 Hudson Street, rear off 146-156 Abercrombie Street and rear of Scape building (entrance Corner Abercrombie & Cleveland Streets)

Note Sun position as at 8.52am 01/05/2025.



Imagine 146 Abercrombie Street through Hudson Street. Note 5 Hudson Street (4-storeys) is the same height as 146 Cleveland Street (3-storeys).



Imagine looking from Abercrombie down Vine Street with 2-30 the Black building on the left.



Units from corner Vine and Abercrombie St (close proximity to Cleveland Street)





Units corner Abercrombie Street & Cleveland Street 153A and its relationship to neighbouring 2 storey terraces.



5 Hudson Street and relationship to neighbouring property 146f Abercrombie and Hudson Street with Rear of 2-14 looking up Evans Lane.



5 Hudson Street and relationship to neighbouring property 146 Abercrombie.



146-158 Abercrombie Street looking up diagonally across from Hudson up to the corner of Vine Street; including the 2- storey hotel at the corner Vine and Abercrombie Streets.



Across roundabout Abercrombie St and Vine Street 3 storey on corner and relationship to the 2 storey terraces.



Looking down other side of Vine Street from corner of Abercrombie & Vine Streets



Looking up Abercrombie Street heading to Lawson Street



Looking up Abercrombie Street heading to Lawson Street



Units at the corner of Abercrombie and Lawson Street.



Looking from the corner of Lawson Street towards Hugo, Louis and Eveleigh Streets.



Corner of Louis & Caroline Streets. Rear of Aboriginal Housing Office Building (3-storey (on slope)) and relationship to both Lawson & Caroline St Redfern 2 storey terraces.