

**ANGEL PLACE
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SYDNEY NSW 2000**

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21 September 2022

Ms Minoshi Weerasinghe
Senior Planning Officer
Level 17, 4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Minoshi,

RESPONSE TO REQUEST FOR FURTHER INFORMATION - 104-116 REGENT STREET, REDFERN

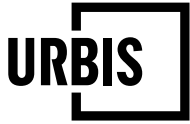
This letter has been prepared by Urbis on behalf of Wee Hur and relates to State Significant Development Application (**SSDA**) at 104-116 Regent Street, Redfern (**SSD-12618001**).

This letter responds to a Request for Information (**RFI**) issued by the Department of Planning and Environment (**DPE**) on 15 July 2022. DPE requested responses to additional submission by City of Sydney, Sydney Metro and one public submission following their review of the Response to Submissions (**RtS**) report submitted by Wee Hur on 15 June 2022.

This letter responds to each of the issues raised in the above submissions and is accompanied by the following supporting documentation:

- Appendix A – Clause 16A Variation Request
- Appendix B – Arborist Statement
- Appendix C – Operational Management Plan
- Appendix D – Architectural Plans
- Appendix E – View Study and Artwork
- Appendix F – Landscape Report and Statement
- Appendix G – Loading Management Plan
- Appendix H – Flood Statement
- Appendix I – Waste Management Plan

The updated plans and reports have been prepared based on follow-up discussions with the City of Sydney to ensure each of their concerns have been satisfactorily resolved. We would appreciate confirmation that their objection has been formally withdrawn to enable the final assessment and determination of the SSDA by the DPE under delegation.



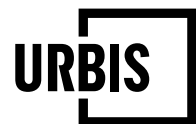
1. PROJECT BACKGROUND

SSD-12618001 was lodged with the DPE in December 2021 in accordance with Schedule 2 of *State Environmental Planning Policy (Planning Systems) 2021*. A Submissions Report that outlined the proposed refinements and clarifications was submitted on 15 June 2022. This letter responds to a RFI issued by DPE on 15 July 2022.

The project team have engaged with the City of Sydney and DPE to discuss their feedback and the proposed amendments to the proposal which include:

- Additional 93m² food and drink premises on the south western corner (Margaret Street and William Lane) of the ground level. The proposal now includes 159m² of retail floorspace to activate the multiple street frontages.
- Incorporation of a 15.3 metre high and 5.8 metre wide reckli artwork on the northern façade of the building.
- Minor amendments to the Architectural Plans, Landscape Plans and Waste Management Plan, as detailed in the response table on the following pages of this response.

We understand that the proposed design changes have satisfactorily resolved each of the remaining concerns raised by the City of Sydney to facilitate the withdrawal of their objection to the proposal.

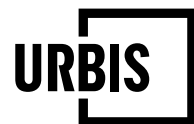


2. RESPONSE TO SUBMISSIONS

2.1. DEPARTMENT OF PLANNING AND ENVIRONMENT

Table 1 Response to Department of Planning and Environment

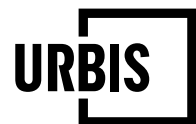
Comment	Response
Provide an updated Clause 16A variation request that considers the amended Architectural Plans, including rooftop exceedances	An updated Clause 16A variation request has been prepared by Urbis and is provided at Appendix A .
Provide further information on how the existing street tree on Regent Street can be retained given its close proximity to the proposed development.	Urban Arbor have provided an updated statement at Appendix B that details how the existing street tree on Regent Street can be retained given its proximity to the proposal.
Confirm the operational hours of the outdoor terraces areas on Levels 2, 4 and 16, noting this differs in the EIS and Operational Plan of Management.	<p>The proposed operational hours of the outdoor terraces areas are 8am to 10pm, 7 days a week.</p> <p>This has been updated in the Operational Plan of Management (Appendix C) to ensure consistency.</p>
Address Council's issues regarding further activation of the ground floor and public artwork and their recommendations and conditions.	A detailed response to Council's issues regarding activation of the ground floor is provided at Item 1 in Table 2 below.



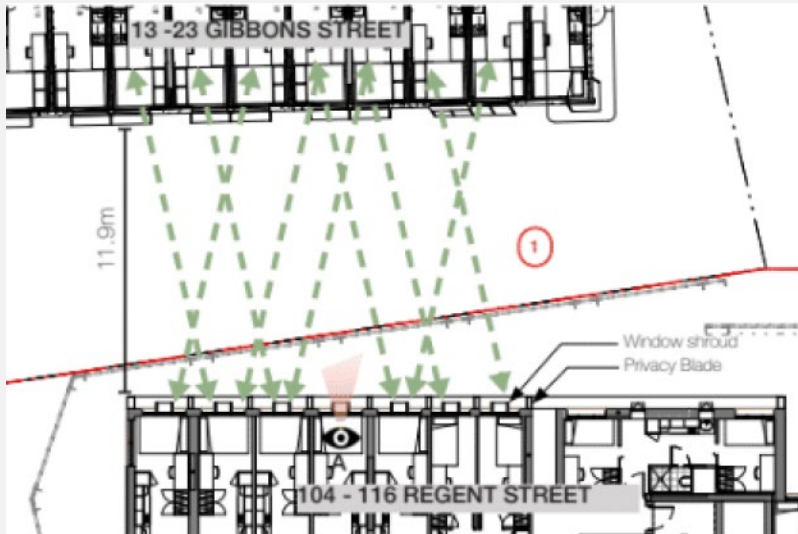
2.2. CITY OF SYDNEY

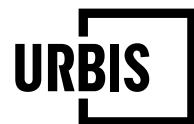
Table 2 Response to City of Sydney Submission

Comment	Response
<p>1. Active Frontages</p> <p>The RTS has sought to address the City's previous concerns relating to active frontages by splitting the bicycle storage areas between Regent Street and William Lane, relocating administration and office along the Regent Street frontage, relocating the games area to the ground floor, provision of skylights in the Margaret Street undercroft and provision of a retail space on Regent Street.</p> <p>However, the response is inadequate and collectively, the development fails to provide activation to the other frontages on Margaret Street and future through-site link and pedestrianised extension of William Street. This is a missed opportunity for good place making.</p> <p>The proposed gym area on the south-western corner of the ground floor is an ideal location for a food and drink premises that could activate Margaret Street along the southern boundary and the pedestrianised William Lane extension on the western boundary (refer to figure 1).</p> <p>Further, the City reiterates previous comments in relation to the 2.8m floor to ceiling heights of the ground floor retail tenancy on Regent Street. This presents as a residential scale and should be increased.</p>	<p>In accordance with the City of Sydney's feedback and follow up discussions, the Proponent has included a 93m² food and drink premises on the south western corner of the ground floor. The proposal now includes 159m² of retail floorspace (an increase from 72m²) to activate each of the frontages and provide additional services and employment to benefit the local community.</p> <p>As shown in the amended Architectural Plans (Appendix D), the gym has been relocated to the Level 2 communal area.</p>

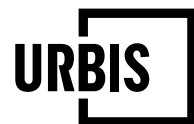


Comment	Response
<p>2. Building Expression and Public Art</p> <p>The RTS has sought to address the City's previous concerns regarding the blank building expression on the northern and southern elevations through the provision of reckli form liner patterns to create a textured and modulated façade. Public art is proposed to be designed and integrated in the reckli patterns.</p> <p>This response can be acceptable to the City if the facade can accommodate sufficiently thick form liner panels to deliver an artwork of depth in the façade. It is strongly suggested that an indigenous artist be engaged to produce any future artwork for the development, particularly with Redfern's strong historical links to Aboriginal people and culture.</p>	<p>Antoniades Architects have undertaken a visual study of the southern façade to understand the extent that it would be visible from different vantage points. The study (Appendix E) demonstrates the southern façade will be most visible on the uppermost five storeys.</p> <p>The project team has engaged a local indigenous artist Nicole Monks, who has created artworks for the adjacent 13-23 Gibbons Street and 90-102 Regent Street buildings. Taking inspiration from the weaving pattern of the podium façade, Nicole recommended that the proposed development could include a more feminine artwork in contrast to the masculine artwork of 90-102 Regent Street building. Nicole has recently undertaken a photographic workshop with award winning photographer Wayne Quilliam and the Brolga Dance Company. Nicole suggested incorporating an image of the dancers into the precast concrete.</p> <p>The project team are currently working through the copyright issues and permissions to use the image prior to engaging the precast manufacturer. The artwork will be 15.3 metres high and 5.8 metres wide and will be approved by City of Sydney as a condition of consent.</p>

Comment	Response
<p>3. Urban Design</p> <p>a. Tower separation</p> <p>The City maintains that the substantially non-compliant building separation to neighbouring towers to the north and west deliver substandard built form and amenity outcomes for this 4-tower city fringe block. However, it is noted that commensurate separation distances have been supported by DPE for the adjacent sites at 13-23 Gibbons Street and its northern building separation to 11 Gibbons Street.</p> <p>Should the proposed setbacks be supported by DPE, the City recommends that a condition of consent be imposed requiring operable privacy treatments to west-facing rooms of the development be provided.</p>	<p>Privacy louvres are proposed on the west facing bedrooms to 13-23 Gibbons Street. As outlined on Page 7 of the Design Report, the louvres will angle sight lines in a diagonal direction, to increase visual privacy.</p> 
<p>b. Wind Impacts</p> <p>The executive summary of the Updated Environmental Wind Assessment Report, prepared by SLR, outlines the recommendations for wind amelioration. These should be requested to be reflected in the architectural and landscape packages, including the detailed recommendations to the Level 2 and 16 outdoor areas, prior to the determination to ensure these elements are well designed and integrated into the development.</p>	<p>The Wind report (June 2022) by SLR Consulting recommended the following treatments:</p> <ul style="list-style-type: none"> Retention of the proposed vertical façade screening along the perimeter of the development (from level 2 slab up to level 4 slab). Retention of the proposed tree planting on the Level 2 communal area, Level 4 outdoor area and Level 16 communal area.



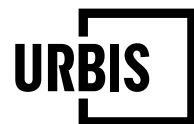
Comment	Response
<p>Additionally, locations 4 and 5 within the through-site link are indicated as seating areas on the landscape plan. Therefore, further landscape mitigation measures are recommended to be implemented to achieve the required 4m/s wind criteria for sitting prescribed by Sydney DCP 2012.</p>	<ul style="list-style-type: none"> ▪ The proposed landscaping should be evergreen. ▪ Localised horizontal protection (eg pergola, shade-cloth, umbrellas, etc) to protect any elevated terrace areas intended to be used for outdoor dining. <p>The amended Architectural Plans (Appendix D) and Landscape Plans (Appendix E) show the retention of extensive planting across the outdoor terraces and localised horizontal protection.</p> <p>The through-site-link is not within the subject site boundary. A modification application is currently being prepared by Wee Hur for the adjoining proposal at 13-23 Gibbons Street to address these recommendations.</p>
<p>c. Signage</p> <p>The City reiterates previous comments in that a signage strategy is required for the development in accordance with the Redfern Centre Urban Design Principles 3.4.2. The signage drawings relate to signage zones only and does not meet the minimum requirements of a signage strategy where signage for the entire development is nominated. There is no signage indicated for the retail tenancy. Accordingly, it is recommended that a separation application be made for a signage strategy and detailed signage for the site.</p> <p>Further, the William Lane podium signage is excessively wide and is not supported. A maximum 300mm width lettering is recommended, with individual lettering pinned on a quality finish wall.</p>	<p>Noted – an appropriate condition can be incorporated into the consent to provide for a Signage Strategy and the detailed signage via a separate DA.</p>



Comment	Response
<p>4. Landscaping and Tree</p> <p><i>Existing trees, urban canopy and wind</i></p> <p>The street tree located on Regent Street is now nominated for retention. However, the proposed awning will impact on the tree canopy. Any design elements, such as awnings, street furniture and footpath upgrades within the public domain must ensure appropriate setbacks are provided from existing street trees to allow maturity of the trees to be achieved.</p>	<p>Future public domain works on Regent Street including awnings, street furniture and footpath upgrades will provide appropriate setbacks are provided to tree maturity. This can be included as a condition of consent.</p>
<p>The Landscape Plans, prepared by RPS, propose four street trees on Margaret Street and four trees along William Lane or through-site link. However, one street tree in Margaret Street and the through-site link were approved under SSD 9194 for 13-23 Gibbons Street and are outside of the site boundary for this site. New street trees in Margaret Street will be on public land and therefore, do not contribute to the City's requirement of 15% canopy coverage within 10 years of completion. It is recommended that all trees planted within the public domain including the through-site link are in accordance with City of Sydney Street Tree Masterplan and Tree Management Policy. The landscape design must be coordinated with adjacent sites.</p>	<p>Each of the issues raised by Council has been addressed as follows:</p> <ul style="list-style-type: none"> ▪ An additional 4 trees (in rhomboid shaped planters at the intersections of paving type) and supporting structural cell (StrataVault) have been included in the design and within the project boundary. ▪ The trees are proposed to be 400L Tristaniopsis laurina (Water Gum) with a clear trunk height of minimum 2.5m on installation to allow for circulation. Water gums are included in the COS typical acceptable species list. ▪ The outer extents of the structural cell (StrataVault) will be situated to avoid major services and guide roots away from critical infrastructure while providing optimum conditions for root and canopy growth. ▪ RPS Landscape have calculated a total canopy coverage of 23.50% across all levels of the project. This excludes trees within the public domain at the through-link and the 5 trees at the kerb on Margaret Street.

Comment	Response
	<ul style="list-style-type: none"> When full growth is achieved, a total canopy area of 160m² for the 4 new trees proposed in Margaret Street, or approximately 11% of the total site area.
<p>Trees on the Level 2 communal terrace include 31 small sized trees in integral and GRC planters. These trees are located at close centres ranging from 1.8 to 2.8m spacings. The updated wind report notes that wind tunnel testing found several points on the Level 2 and 16 communal open space areas with predicted 5% exceedance levels for standing.</p> <p>To meet the wind report mitigation recommendations and to achieve the Sydney DCP 2012 standing criterion, extensive tree planting is proposed at close centres in raised GRC planters is recommended. However, Level 2 trees in GRC planters are located to maintenance access areas only.</p> <p>The planters are at 1.8m centres in planters with 3.61 cubic metres of soil volume, which is significantly less than the minimum 9 cubic metre per small sized tree required by the City's Landscape Code. These trees are 1.2m from the façade edge and will suffer from crown suppression and unlikely to reach maturity required for urban canopy targets.</p>	<p>Each of the issues raised by Council has been addressed as follows:</p> <ul style="list-style-type: none"> The RPS Landscape Statement at Appendix F provides detailed justification for the proposed planting on the Level 2 and 16 communal open space areas. Most of the seated areas provided on Level 16 are under a pergola and will be protected from wind. The design has ensured that the wider planter to the east (maintenance path) is located to the outer edge to enable maximum canopy development. The trees to be planted as tall and narrow <i>Elaeocarpus</i> to these areas and will provide a natural wind break. The landscape design has maximised soil volume for trees adjacent to the new internal study location to the west.
<p>Level 16 includes 10 trees at close centres located in a central integral planter 700mm high that rely on mounding to achieve minimum 1m depth required for tree planting. There are perimeter GRC planters with shrubs. No planting plans have been submitted, only a plant schedule. A reliance on living evergreen trees to mitigate wind on upper levels of a building is problematic if the trees</p>	<p>Each of the issues raised by Council has been addressed as follows:</p> <ul style="list-style-type: none"> The central landscaped planter will provide screening and shelter for students. The planter will contain planting of sufficient mature stock and the trees will be anchored both below and above ground.

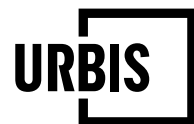
Comment	Response
<p>fail. The design is a poor outcome and not supported from a landscape perspective.</p>	<ul style="list-style-type: none"> ▪ We will look at the option to increase the planter height to improve the volume of soil without mounding ▪ More detail has been provided of the planting species in the amended Landscape Plans at Appendix F. ▪ The design includes a deck area for functions/ events that is protected by the planter and vegetation. ▪ The perimeter planter has been redesigned to include a solid hedge with mature plants (25L) and additional larger shrubs at intervals. These will be protected by the perimeter architectural screening.
<p>Facade Greening</p> <p>The proposed facade screen is designed for wind protection and includes fragmented small planters integrated into the podium screen in gaps to the brick facade crisscross pattern. The plants appear to be growing out of thin triangular concrete shape with inadequate soil depth, no allowance for drainage and irrigation to support a successful green facade. To this effect, the City recommends that the planters on the facade screen be deleted.</p> <p>The landscape plans show a coloured concept planter elevation and plant species with notes for an 800mm wide x 650mm deep GRC planter behind brick facade. No planter detail has been provided. However, as proposed, there will be soil media at the planter centre point only. At the edges, there will be no soil depth and it is not feasible. Maintenance is proposed within the building, or for areas not on Level 2, on Regent Street from the public domain using a</p>	<p>The planters on the façade screen have been removed - refer to the amended Architectural Plans at Appendix D and Landscape Plans at Appendix F.</p> <p>The landscaping within the planters to the rear of the screen will be visible through the architectural façade. These planters ensure safe access for maintenance from the terraces.</p>



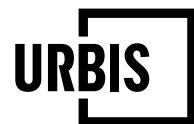
Comment	Response
cherry picker. The latter option is not a certainty as a separate permit would be required.	
<p>Communal Open Space</p> <p>The Level 2 podium terrace is located at the base of the tower with communal outdoor areas to the east, south, and west of the tower with tree perimeter planters and amenity limited to a BBQ, seating areas and a small canopy to a portion on the western edge. The majority of usable communal spaces are to the west and south edges of the tower with remaining areas on the west and eastern sides of the tower nominated for maintenance access only to mechanical plant on the northern edges. Lightwells on the southern edge in gravel are separated from the path by a steep edge, meaning people could access this space which is not an acceptable landscape outcome.</p>	<p>The proposal includes a glass fence with fixing to base and to planters each side to prevent access by the public to the skylights.</p>
<p>The RTS does not clarify the typical edge conditions, parapet edge and balustrade locations ensuring all planting is safely and easily accessible from within the roof terraces. The City recommends that the communal open spaces on Level 2 and 16 be redesigned and rationalised to ensure all tree planting is located in 1m deep planters that provide compliant soil volume, drainage and mulch layers, revise seating to ensure all wall mounted seats do not impact on garden beds, replace a range of furniture designed for all users, and provides usable outdoor spaces designed for wind sitting and dining criterion.</p>	<p>All perimeter planters are a minimum 1m high x minimum 1m width. The amended elevation plans (Architectural Plans at Appendix D) show the full height balustrades and façade treatments to all terraces.</p> <p>Sufficient drainage will be provided to each planter and outlined in the future construction drawings. These spaces have been designed to provide comfortable, sheltered and protected areas.</p>
<p>Contamination</p> <p>The subject site was a former petrol station, and the ground is impacted by significant contamination. The remediation action plan approved under the</p>	<p>The Site Audit Statement confirms the contamination was localised within the site and the groundwater was not contaminated.</p>



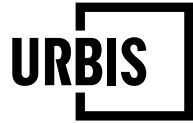
Comment	Response
<p>City's consent D/2020/1095, is for the removal and disposal of contaminants, and where possible, for offsite bioremediation of soils impacted by hydrocarbon spillage to be returned to the site. Bioremediation of the identified contaminants can take decades for the soil to be made safe for use. Accordingly, it is recommended that the proposal provides a minimum 1 metre depth virgin excavated natural material (VENM) for all tree planting and landscape at grade within the site boundary and street trees within the public domain.</p>	<p>As the site has now been cleared for high density residential use, there is no need for further work. The Site Audit Statement recommends the implementation of an unexpected finds protocol during excavation.</p>
<p>5. Transport and Access</p> <p>The RTS is accompanied with a Loading and Servicing Management Plan (LSMP) and outlines that a single small rigid vehicle (SRV) will service this development and the neighbouring student accommodation development at 90-102 Regent Street, Redfern.</p> <p>Transport for NSW's Urban Freight Forecasting tool indicates that around 4 spaces would be required for both buildings. The City continues to raise concern that the shared loading arrangement with a single SRV is insufficient and potentially problematic for the scale of both developments. The LSMP must be amended to consider the following:</p> <ul style="list-style-type: none"> Specify how the LSMP is to be communicated to those needing to use the dock; Outline the procedure in the event that the turntable or roller doors are not operational; 	<p>Each of the issues raised by Council has been addressed as follows:</p> <ul style="list-style-type: none"> An amended Loading Management Plan is provided at Appendix G. The onsite management of the loading dock will consist of a combination of a manned dock management office (Building Manager and / or Building Reception) and a dock management system (DMS). The DMS will enable the onsite management team to schedule delivery times and monitor arrival / departures of vehicles. The DMS will also allow booked arrival / departure times of deliveries to be known such that should a request for delivery time be received, arrival time slots can be allocated accordingly. A regular maintenance program for both the roller door and the vehicle turntable shall be undertaken to ensure that this equipment operates satisfactorily and reduces the potential for breakdowns. Should a breakdown of the roller door or turntable occur, the initial action will be to call out an emergency technician to identify and rectify the issue to ensure access to the loading dock is provided. If the loading dock cannot be



Comment	Response
<ul style="list-style-type: none"> Specify how vehicles will be managed, if the case arises where more than one vehicle needs to access the site at once. It should be noted that queuing or blocking roads would not be acceptable. Outline how the collection of three streams including accommodation and retail will be managed. 	<p>secured a security guard may be engaged to ensure security to the building is maintained.</p> <ul style="list-style-type: none"> The dock management system will moderate demand of the loading dock. The allocation of deliveries to timeslots (with strict length of stay limits) reduces the risk of multiple vehicles seeking to access the loading dock at the same time. Appropriate pick up windows will be provided to the private waste contractors to ensure sufficient time is allowed for the different waste streams can be collected. The retail tenant will also be provided a window for waste collection. The DMS will allow a time gap between booking slots to accommodate potential overruns in deliveries or waste collection.
<p>6. Public Domain</p> <p>Since providing advice on the EIS, the City has carried out investigations on future traffic flow and pedestrian movements in the locality. Concern is raised that there are insufficient public spaces surrounding the site and would not achieve acceptable performance to support anticipated increased traffic flow and pedestrian movements upon completion of the development. Therefore, the City recommends that the following mitigation options be investigated by the developer, if consent is to be granted:</p> <ul style="list-style-type: none"> Implement a share zone in Margaret Street between the William Lane extension and Regent Street. 	<p>The project team met with the relevant City of Sydney officers on 3 August 2022 to discuss the City's submission. It was agreed these matters extend beyond the scope of the current project and a further detailed response is not required.</p>



Comment	Response
<ul style="list-style-type: none">▪ Change Margaret Street to one-way traffic, travelling from Gibbons Street to Regent Street only and widening the footpath on the northern side of Margaret Street.▪ Provide an easement for public access in the building setback along the Margaret Street frontage to ensure sufficient space for tree planting and pedestrian movement is provided. However, this option should be considered as the last resort. <p>Additionally, the City requires the continuous footpath treatment on the Margaret Street crossing to be in accordance with the City's Street Code. An easement for public access must also be provided on the proposed William Lane extension and through- site link, in similar vein to the adjacent development at 13-23 Gibbons Street.</p>	
<p>A new comment is raised in relation to flooding on the site. The previously submitted Flood Statement, prepared by WMA Water, incorrectly states entry door nos. 10 and 11 as having a freeboard of 100mm for the internal 1% AEP. However, it has a 0.0 freeboard. Clarification is required on the necessary freeboard for the proposed development.</p>	<p>A Flood Statement has been prepared by WMA Water and is provided at Appendix H. WMA have provided an updated table that lists the description of the internal space at each door, the finished floor level (FFL) and the 1% AEP and PMF flood levels. Also listed are the height of the FFL above the 1% AEP and PMF flood levels.</p> <p>WMA Water have reviewed the requirements of Council's Interim Floodplain Management Policy and the proposed finished floor and design flood levels. For 'business' use, the minimum is the 1% AEP flood level. The updated table within Appendix H indicates that this is achieved.</p>



Comment	Response
<p>7. Waste</p> <p>The submitted Waste Management Plan (WMP), prepared by Waste Audit, has been reviewed. Clarity and additional information are required on the following matters:</p> <ul style="list-style-type: none">▪ The WMP provides details of chute failure procedures, which references the placement of spare bins during chute failure in each chute access room. However, the plans indicate that chutes are not contained in these rooms. Further, residents should not be able to access the downstairs chute discharge area and as such, the WMP must be amended with a revised procedure in place. and the WMP makes reference to residents accessing▪ Doors for access 90-102 Regent Street on the ground floor do not appear to be aligned with the loading area to provide access to the turn table on the plans. This should be confirmed.▪ The WMP is unclear if bins will be serviced by a private contractor from the waste storage area at 90-102 Regent Street and if transfers occur at or before collection time. There is insufficient space in the loading area for bins to be moved until collection time and must be confirmed.▪ The City recommends that the proponent should have the chute set up confirmed the chute supplier to ensure it will be installed and operated as designed at the discharge point.▪ The updated plans have resulted in waste storage areas to be too tight for manoeuvring large 1,100L bins. The bins do not seem to be drawn to scale	<p>Waste Audit have updated the Waste Management Plan (Appendix I) to address each of Council's comments.</p> <p>Antoniades Architects have prepared amended plans that show a connection to 90-102 Regent Street, Redfern.</p>

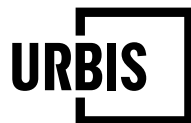


Comment	Response
as per the standard measurements of 1370mm X 1245mm and indicate the manoeuvrability of bins will likely be further reduced.	

2.3. SYDNEY METRO

As per Sydney Metro's previous letter dated 23 February 2022 (attached), if the consent authority determines to grant consent to the DA, Sydney Metro requests that the conditions in Attachment A of the letter be imposed on the development consent.

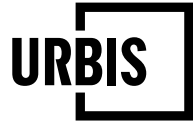
Wee Hur have reviewed the draft conditions provided by Sydney Metro and provide no objections.



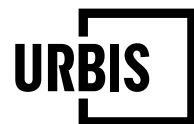
2.4. PUBLIC SUBMISSION

Table 3 Response to Public Submission

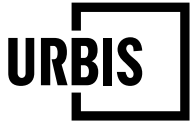
Comment	Response
<p>1. Consultation</p> <p>On 23 February 2022 we wrote to Wee Hur suggesting a meeting to discuss the proposal but received no response.</p>	<p>All issues raised during the community engagement and public exhibition processes have been addressed within the EIS and Submissions Report in an open and transparent manner.</p>
<p>2. Cumulative Impacts</p> <p>The response makes no attempt to answer the issue raised other than to state that the proposal is permissible, irrespective of whether it is good for Redfern. Many individuals/ entities have raised this issue over the three Wee Hur proposals. Perhaps it is just a failure of the planning process.</p>	<p>The Response to Submissions Report prepared by Urbis (15 June 2022) confirms the approved and likely future developments have been addressed in the cumulative impact assessment (refer Table 12 of the EIS).</p>
<p>3. Misrepresentation of Immediate Surroundings</p> <p>This issue has been raised before and ignored by the Proponent. One would assume that the proponent is trying to present that the development is in a non-residential neighbourhood.</p>	<p>The Response to Submissions Report prepared by Urbis (15 June 2022) acknowledged the development to the south west along Margaret Street comprises a four storey residential development. Further directly south of St Luke's Presbyterian Church are two-storey mixed use terraces with commercial uses along the ground floor.</p>
<p>4. Water Service</p> <p>We would like some guarantee that the water issue will be adequately addressed. This has not happened in the past with other developments and has ultimately placed substantial additional costs on existing residents.</p>	<p>The Response to Submissions Report prepared by Urbis (15 June 2022) confirmed a Water Services Coordinator will be engaged to coordinate the required water main works, including a Section 73 application to Sydney Water, following lodgement of the SSDA documentation.</p>



Comment	Response
<p>5. Inadequate Parking</p> <p>This is perhaps our greatest concern and the response does not address the issues we have raised in any way.</p> <p>We state in our submission that we accept that the majority of students will not own a car. Our issue is the multiplier impact of the extra student residents in the area and as stated in the submission it is occasional student use (through GoGet etc), visits by family/friends, the provision of services and courier deliveries to the students and building that cause the problem. It is irrelevant that other similar proposals in the area have provided no parking, in these cases it is only poor decision making that greatly increases the magnitude of the problem and the issues for existing residents. Please refer to our original submission. We strongly believe a limited number of casual places must be provided with any development.</p>	<p>The TIA prepared by TTPP (Appendix N of the EIS) concludes the site is well-serviced by high frequency public transport services and the future Sydney Metro Waterloo Station will provide additional travel options.</p> <p>On this basis, it is considered acceptable and appropriate that the proposed student accommodation development does not provide any on-site car parking. This approach will discourage private car ownership, in alignment with the NSW Government and City of Sydney strategic transport objectives. The provision of 112 bicycle spaces is considered appropriate to encourage active transport.</p>
<p>6. Inadequate Feasible Alternatives Assessment</p> <p>The response simply does not address our submission issues and remains deficient under the requirements as outlined in the submission. Please refer to our original submission.</p>	<p>The Response to Submissions Report prepared by Urbis (15 June 2022) confirmed that Section 2.4 of the EIS included an analysis of feasible alternatives having regard to the objectives of the development, including the consequences of not carrying out the development.</p> <p>The analysis of alternatives explained how the project has ended up in its current form. In summary, the final siting and design responds to feedback from the SDRP, including detailed commentary following the final meeting. The proposed design satisfactorily responds to the site opportunities and constraints and surrounding developments.</p>



Comment	Response
<p>7. Cumulative Construction Impacts</p> <p>We remain concerned that any CTMP as part of a development consent will realistically mitigate these issues. It is difficult to see how the three (even two) projects could proceed simultaneously without major dislocation for residents in the immediate vicinity.</p>	<p>A detailed Construction Traffic Management Plan will be prepared. The CTMP will consider all surrounding development approvals and construction management plans to minimise determinantal impacts to the public.</p>
<p>8. Inadequate Bicycle Infrastructure</p> <p>Noted - it would be hoped that a reasonable proportion of the Development Contribution was allocated to improved bicycle infrastructure.</p>	<p>It is expected that the development contributions will contribute to the public domain works as per the Redfern- Waterloo Development Contributions Plan 2006.</p>
<p>9. Roof Garden Privacy</p> <p>A more resilient barrier than planter boxes should be provided.</p>	<p>The roof top gardens have 1m planters around the perimeter which prohibits access to the perimeter edge and mitigates overlooking impacts.</p>
<p>10. Wind Tunnel Impacts</p> <p>The response is outside our level of expertise and therefore accept the response provided.</p>	<p>Noted and accepted.</p>



3. SUMMARY AND CONCLUSION

This letter and the supporting reports satisfactorily respond to each of the issues raised by DPE, the City of Sydney, Sydney Metro and the public.

It is considered the proposal is acceptable having regard to the relevant biophysical, economic and social considerations. The proposal will support the tertiary education sector, one of Australia's major international exports, both now and into the future by delivering additional student housing close to major institutions. The proposal will also support local employment during the construction and operation phases and contribute to future increases in local spending, economic growth and development of the precinct.

Having considered all relevant matters, we conclude that the proposed modification is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

Kind regards,

A handwritten signature in black ink that reads "gmckenzie".

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