SENSITIVE GOVERNMENT

NSW Police Force
www.police.nsw.gov.au

D/2022/118400

Mr Cameron SARGENT
Team Leader
Key Sites Assessments
Department of Planning and Environment

24th February 2022

Dear Mr SARGENT

Application No: SSD 12618001

Property: 104-116 Regent Street, Redfern NSW 2016

Existing Layout (google maps)

SOUTH SYDNEY POLICE AREA COMMAND
965 Botany Road, Mascot NSW 2020
Tower B 1 Lawson Street Redfern NSW 2016
T 02 8338 7399 **T** 02 8303 5199 **W** www.police.nsw.gov.au
TTY 02 9211 3776 for the hearing and speech impaired ABN 43 408 613 180

Artist Impression of development

Proposal:
The State Significant Development application seeks approval for a new student accomodation development including: construction of an 18 storey student accomodation development including 411 beds(comprising of 331 studio rooms, 25 en-suite rooms, 24 two bedrooms and 7 accessible rooms), communal spaces, on-site bicycle parking, ancillary facillities and ground floor retail premises, land scaping and public domain works.

I refer to the above and your correspondence dated 25th January 2022. In accordance with the Environmental Planning and Assessment Act, 1979, Section 79C Crime Prevention Guidelines, a Safer by Design Crime Risk Evaluation has been prepared. As a result of this process a **Medium** crime risk rating has been identified for the proposed development on a sliding scale of **Low, Medium, High** and **Extreme** crime risk.

Police support the proposal, however would like the Minister of planning to take into consideration the following potential crime risks and recommendations**.**

Crime risks:

SOUTH SYDNEY POLICE AREA COMMAND
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Potential for the following incidences to occur:

- Break / enter / steal.
- Malicious damage incidents.
- Steal from dwelling (Mail / delivery theft).
- Steal from retail.
- Steal from person/robbery incidents.
- Neighbour disputes.
- Domestic Violence.

Recommendations:

- Bicycle rack area should be covered by CCTV.
- CCTV should be installed at entry / exit points to building and retail stores. In foyer / mail area, in lifts, corridors and common areas.
- Mailbox/delivery area to be internal of building. CCTV should be positioned covering this area.
- Information placed in foyer entrance area, covering delivery of packages policy for students, where each student must take responsibility for any packages/food deliveries they order to prevent the growing trend of package theft
- A copy of “House rules” to be given to each student upon commencement of tenancy, covering policies, rules and consequences for any breaches.
- Information on how and when to report crime should be displayed in foyer area, including phone numbers such as Emergency, Crime Stoppers, Police Assistance line and Redfern Police station.
- CCTV should be available to police promptly when requested and should be retained for a period of 1 month or more. Swipe passes for general access to the building should be issued to police in case emergency access is required. After hours emergency/security number/s should be provided to police.
- Adequate lighting should be positioned covering premises and surrounding areas of building to create visibility at night and to reduce opportunity for hidden areas.
- Clear signage of building number and building name to be clearly displayed, with light shining on signs at night to allow clear visibility for Police.
- Warning signs “CCTV in use at all times, trespassers will be prosecuted” etc. to be clearly displayed.
- All shrubs to be no higher than 1 metre, so visibility and clear sight lines can be maintained onto the premises.
- Signage to be installed throughout building providing access control, and clear directions for students.

For any further information or questions in relation to the evaluation contact Senior Constable Rebecca LEO, Crime Prevention Officer, South Sydney Police Area Command on (02) 8338 7475.

Yours Sincerely,

Superintendent Rod HART
South Sydney Police Area Command

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104- 116 REGENT STREET, REDFERN

Wee Hur Student Housing –
Environmental Impact Statement

SSD-12618001

Prepared for
THE TRUST COMPANY (AUSTRALIA) LIMITED ATF WH REDFERN TRUST
17 December 2021

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Jennifer Cooper
Consultant	Georgia McKenzie
Project Code	P0028603
Report Number	Final

urbis.com.au

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SIGNED DECLARATION

SUBMISSION OF ENVIRONMENTAL IMPACT STATEMENT

Environmental Assessment prepared by:

Names:	Jennifer Cooper, Bachelor of Town Planning (Honours), University of New South Wales Georgia McKenzie, Bachelor of City Planning (Honours), University of New South Wales
Address:	Urbis Pty Level 8, 123 Pitt Street Sydney NSW 2000
In respect of:	SSD-12618001: Student Accommodation at 104- 116 Regent Street, Redfern

Applicant and Land Details:

Applicant:	The Trust Company (Australia) Limited ATF WH Redfern Trust
Applicant address	39 Kim Keat Road, Wee Hur Building, Singapore 328814
Land to be developed:	104- 116 Regent Street, Redfern NSW 2016
Legal description:	Lot 10 DP 1026349
Project Summary	Construction of an 18 storey mixed-use building accommodating ground floor retail premises and 411 bed student housing accommodation with indoor and outdoor communal spaces, on-site bicycle parking and ancillary facilities.

We certify that the content of the Environmental Impact Statement, to the best of our knowledge, has been prepared:

- In accordance with the Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*;
- Contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which that statement relates; and
- The information contained in this statement is neither false nor misleading.

Name/Position:	Jennifer Cooper	Georgia McKenzie
Signature:		
Date:	17/12/2021	17/12/2021

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AQIA	Air Quality Impact Assessment
ARH SEPP	State Significant Environmental Planning Policy (Affordable Rental Housing) 2009
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BCA	*Building Code of Australia*
BC Act	*Biodiversity Conservation Act 2016*
BC Reg	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
BEP	Redfern Waterloo Built Environment Plan Stage 1
CPTED	Crime Prevention Through Environmental Design
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DPIE	NSW Department of Planning, Industry and Environment
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPA Regulation	*Environmental Planning and Assessment Regulation 2000*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
ESD	Ecologically Sustainable Development
GANSW	Government Architect NSW
GTP	Green Travel Plan
LEP	Local Environmental Plan
MNES	Matters of National Environmental Significance

Reference	Description
NCC	National Construction Code
NPW	*National Parks and Wildlife Act 1974*
OSDT	On-Site Detention Tank
OEMP	Operational Environmental Management Plan
PAD	Potential Archaeological Deposit
PBSA	Purpose-built Student Accommodation
PMF	Probable Maximum Flood
POM	Plan of Management
RAP	Remediation Action Plan
RMS Guide	RMS Guide to Traffic Generating Developments
SAC	Site Assessment Criteria
SDRP	State Design Review Panel
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SEPP 55	State Environmental Planning Policy No 55 – Remediation of Land
Site	Lot 10 DP 1026349
SRD SEPP	*State Environmental Planning Policy (State and Regional Development) 2011*
SSP SEPP	State Environmental Planning Policy (State Significant Precincts) 2005
SSD	State Significant Development
SSDA	State Significant Development Application
TIA	Traffic Impact Assessment
UDP	Redfern Centre Urban Design Principles
VIA	Visual Impact Assessment
Wee Hur	The Trust Company (Australia) Limited ATF WH Redfern Trust
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

EXECUTIVE SUMMARY

The Environmental Impact Statement (**EIS**) has been prepared on behalf of The Trust Company (Australia) Limited ATF WH Redfern Trust (**Wee Hur**) in support of a State Significant Development Application (**SSDA**) for a mixed-use development comprising a ground floor retail premises and student accommodation with ancillary facilities and works at 104-116 Regent Street, Redfern.

The proposed development has an estimated capital investment value of $52,800,000 and accordingly, is classified as a State Significant Development (**SSD**) under Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (the **SRD SEPP**).

This EIS has been prepared to support the SSDA and responds to the relevant matters listed within the Secretary's Environmental Assessment Requirements (**SEARs**) issued on 8 February 2021.

Figure 1 Photomontage

Source: Antoniades Architects

BACKGROUND

Wee Hur provides quality purpose-built student accommodation (**PBSA**) to tertiary students. Their existing and proposed facilities are strategically located close to universities, public transport and amenities within major capital cities. Their developments are designed based on the needs of students, providing a range of indoor and outdoor communal open spaces for students to interact and supporting amenities which create a conducive living environment.

Wee Hur is delivering over 5,700 beds of PBSA within Australia, including completed and approved projects in Adelaide, Brisbane, Canberra, Melbourne and Sydney. This includes two SSDAs which have been approved by the Department of Planning, Industry and Environment (**DPIE**) for 13- 23 Gibbons Street, Redfern and 90- 102 Regent Street, Redfern.

FEASIBLE ALTERNATIVES

Wee Hur identified several project alternatives which were considered in the proposed future use of the site. The feasible alternatives considered include:

- **Option 1 – Do nothing**: an option to leave the site in its current condition and 'do nothing' was considered and dismissed. This option is inconsistent with the project objectives to deliver high housing for tertiary students. Further, it would result in an underutilisation of the site that is inconsistent with strategic planning policy and the revitalisation of the precinct to support housing and employment growth.
- **Option 2 – Original design**: consideration was given to a podium design generally built to the site boundaries. However, this option was discounted based on the potential impacts on the heritage listed church building to the south. This option also failed to optimise the public domain improvement opportunities at the ground plane, including improved pedestrian and cycle connectivity from Margaret Street to William Lane and integration with the approved through-site connection on the adjoining site at 13-23 Gibbons Street.
- **Option 3 – Alternative building designs**: a series of alternative building designs were presented to the State Design Review Panel (**SDRP**) between March 2021 and September 2021, The original proposal comprised a tower form aligned with existing and proposed tower forms along Regent and Margaret Street. Revisions were required to improve the relationship of the building with St Luke's Presbyterian Church, Margaret Street and William Lane. A detailed exploration of various building separation, setbacks and public domain improvements was undertaken, including an option which fully complied with all relevant controls but was unviable and inconsistent with the surrounding built form. The final scheme incorporated significant changes to the podium, including removal of awnings from William Lane and relocation of building entries and bicycle storage to optimise streetscape activation. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.
- **Option 4 – Final building design**: 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 including the following design considerations:
  - The podium has a nil setback to Regent Street which aligns with the approved 90-102 Regent Street podium and other developments further north and a minimum setback of 4.6m along Margaret Street to achieve an appropriate separation from St Luke's Presbyterian Church.
  - The tower form has been setback 7.6m from the southern boundary (greater than 4m required) to improve the relationship with St Luke's Presbyterian Church.
  - The southern tower steps down in height to improve the transition to the south and reduce potential impacts.

An extract of the architectural drawings showing the final building design is provided as **Figure 2** and is described in further detail below.

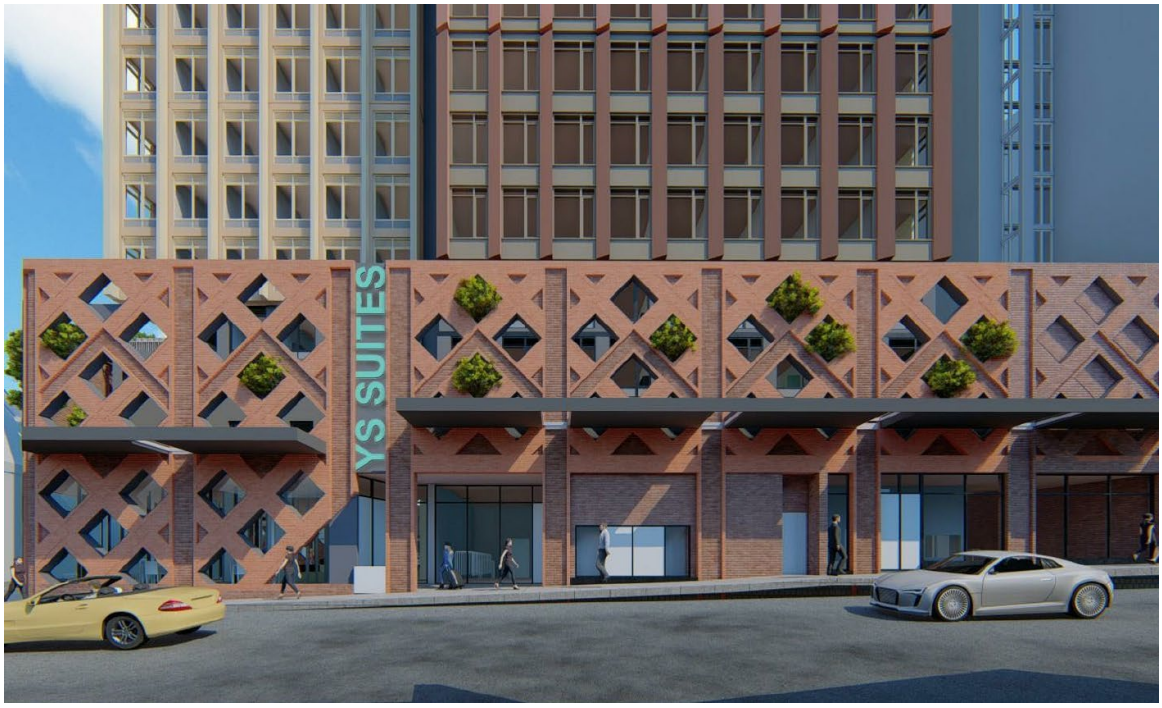
THE PROPOSAL

The proposal comprises the redevelopment of the site as summarised below:

- Construction of an 18-storey building comprising a total of 9,562m² gross floor area with a mix of land use activities including:
  - Ground (Level 1): 72m² of retail floorspace, 490m² of communal area for student accommodation, 102 bicycle parking spaces, waste management facilities and ancillary services and facilities.
  - Upper levels: student accommodation providing a total of 411 beds, including en-suite rooms, studios and two-bedroom configurations, with indoor and outdoor communal spaces on Levels 2, 4 and 16 and additional indoor communal areas on Levels 2 and 4.
- Hard and soft landscaping within the outdoor communal terraces on the roof-top of the podium level and Levels 4 and 16.

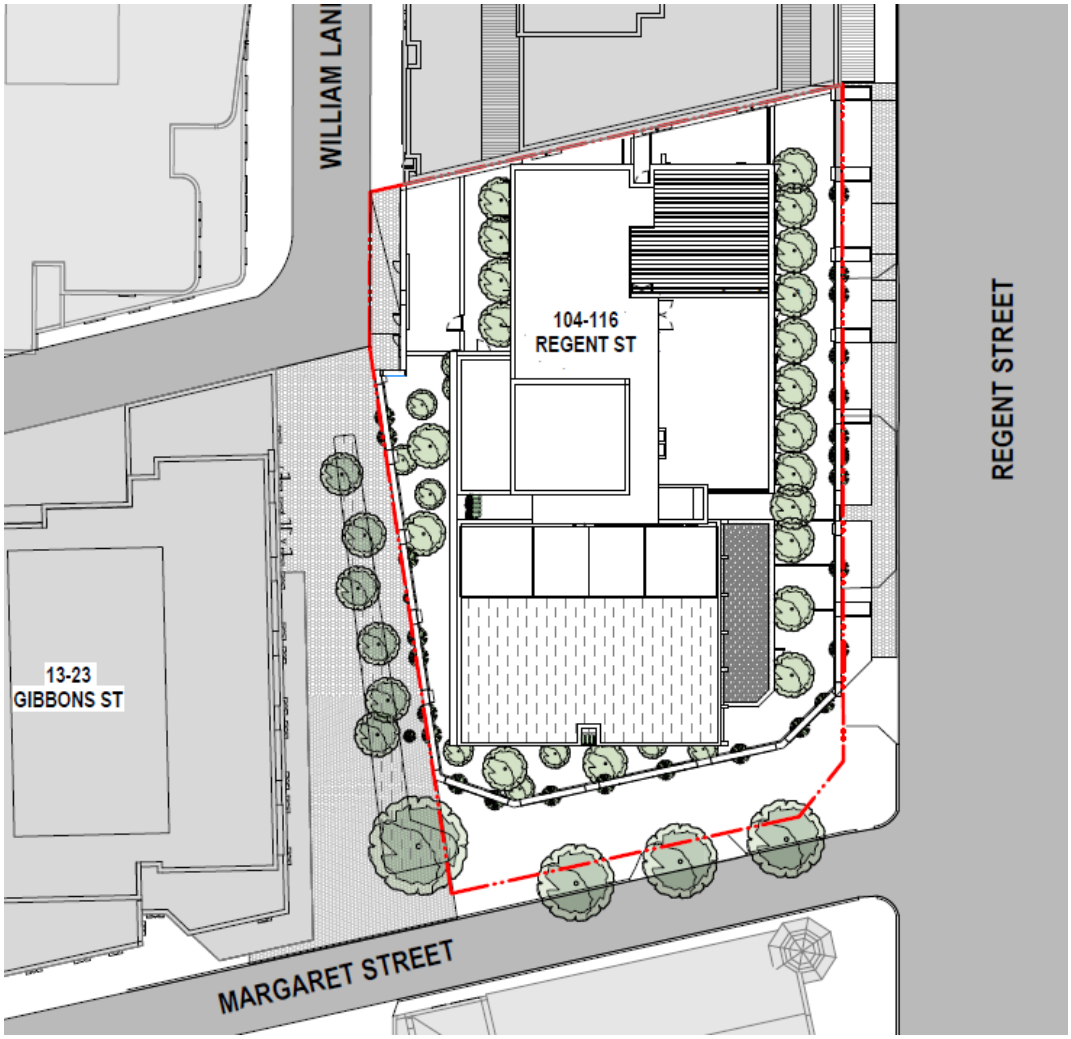
- Public domain improvements to the Regent Street and Margaret Street frontages, including awnings and footpath upgrades. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.

Figure 2 Photomontage of Regent Street Frontage



Source: Antoniades Architects

Figure 3 Site Plan



Source: Antoniades Architects

CONSULTATION

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with adjoining landowners and occupants and government, agency and utility stakeholders.

This included direct engagement and consultation with:

- The City of Sydney Council
- NSW Government Architect's Office
- Sydney Coordination Office within Transport for NSW
- Roads and Maritime Services
- Environment, Energy and Science Group of the Department of Planning, Industry and Environment (former Office of Environment and Heritage)
- Heritage Division of the Department of Premier and Cabinet (former Heritage Division of the Office of Environment and Heritage)
- Sydney Water
- Sydney Trains
- Sydney Metro

- Sydney Airport
- Adjoining sites and landowners.

The outcomes of the stakeholder and community have been incorporated into the final architectural drawings and the supporting specialist plans and reports lodged in accordance with the SEARs.

JUSTIFICATION OF THE PROJECT

This EIS assesses the development in accordance with relevant planning instruments and policies and outlines the mitigation measures to ensure the project does not result in unreasonable or adverse environmental effects. Additionally, the proposed development satisfies the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated.

The proposal represents a positive development outcome for the site and surrounding area for the following reasons:

- **The proposal is consistent with state and local strategic planning policies:**

  The proposal is consistent with the relevant goals and strategies contained in:

  – *Premier's Priorities*
  – *Future Transport Strategy 2056*
  – *Better Placed – An integrated design policy for the built environment of New South Wales*
  – *Guide to Traffic Generating Developments (RMS)*
  – *Development near Rail Corridors and Busy Roads – Interim Guideline*
  – *Greater Sydney Region Plan – A Metropolis of Three Cities*
  – *Eastern City District Plan*
  – *Sustainable Sydney 2030*
  – *Central to Eveleigh Urban Transformation Strategy*
  – *Redfern-Waterloo Built Environment Plan (Stage One)*
  – *Redfern Centre Urban Design Principles*
  – *Connecting with Country Draft Framework*
  – *Designing with Country Discussion Paper*

- **The proposal satisfies the applicable local and state development controls:**

  The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including

  – *Environmental Planning and Assessment Act 1979*
  – *NSW Biodiversity Conservation Act 2016*
  – *State Environmental Planning Policy (State and Regional Development) 2011*
  – *State Environmental Planning Policy (State Significant Precincts) 2005*
  – *State Environmental Planning Policy (Urban Renewal) 2010*
  – *State Environmental Planning Policy (Affordable Rental Housing) 2009*
  – *State Environmental Planning Policy (Infrastructure 2007)*

- *State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)*
- *State Environmental Planning Policy No 64—Advertising and Signage*
- *State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *Sydney Local Environmental Plan 2012*
- *Sydney Development Control Plan 2012*
- *Redfern-Waterloo Development Contributions Plan 2006*
- *Redfern-Waterloo Affordable Housing Contributions Plan 2006*

- **The design responds appropriately to the opportunities and constraints presented by the site:**
  - The Design Report prepared by Antoniades Architects (**Appendix H**) provides a comprehensive assessment of the urban context, including the way in which the proposed built form, height, bulk and scale, setbacks and interface responds to the existing, approved and likely future development within the surrounding locality and the public domain.
  - Following advice from GANSW during the four SDRP meetings, Antoniades Architects redistributed the gross floor area of the proposal in response to contextual and urban considerations. Specifically, the bulk of the tower form shifted towards the northern site boundary (and away from St Luke's Presbyterian Church) and the southern portion of the tower stepped down.
  - The proposed public domain improvements include new street trees, paving and seating along William Lane will contribute to the activation of the public spaces and social interaction between the building occupants and the locality. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.
  - The proposed development is targeted at students who do not own private vehicles and will walk, cycle or use public transport to nearby universities and local retail, commercial, entertainment and other services. Therefore, no on-site parking is proposed.
  - The proposed development has been designed to comply with the relevant State and local planning requirements and Australian standards and guidelines. The impacts to the natural environment can be mitigated, minimised or managed as summarised in **Section 6** and **Appendix E** and outlined in detail within the specialist reports appended to the EIS.
- **The proposal is highly suitable for the site:**
  - The proposal is consistent with the DPIE and City of Sydney Council policies for the site and surrounding area including the Greater Sydney Region Plan, the Eastern City District Plan and Redfern Centre Urban Design Principles.
  - The proposal is permissible in the 'Zone E – Business – Commercial Core' and is consistent with the objectives of the zone as it will:
    - Facilitate the ongoing development of Redfern by providing a high-quality mixed-use building that is compatible and consistent with recent and approved developments in the Redfern Waterloo Authority area.
    - Provides employment-generating activities and residential development compatible with the surrounding non-residential uses.
    - The site is ideally located for student accommodation as it is within walking distance of many key tertiary institutions including University of Sydney, University of Technology Sydney and Notre Dame University Sydney.
    - The proposed development maximises public transport patronage and encourages walking and cycling. 102 bicycle parking spaces has been provided instead of car parking spaces. The site is close to Redfern Railway Station and Redfern and Surry Hills town centres.

- **The proposal is in the public interest:**
  - The proposed development will contribute to the ongoing delivery of a diversity of housing within the locality. The proposed use of the site for student accommodation is considered entirely appropriate as it will optimise its location within easy walking distance of major tertiary institutions, high-frequency public transport and existing local services.
  - The proposed public domain improvements include new street trees, paving and seating along William Lane will contribute to the activation of the public spaces and social interaction between the building occupants and the locality.
  - The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
  - The proposal provides employment opportunities in the short-term through construction and in the long-term through ongoing operation and retail uses.
  - The issues identified during the stakeholder engagement have been addressed through the amended architectural design.

In view of the above, it is considered that this SSD Application has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1. INTRODUCTION

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	The Trust Company (Australia) Limited ATF WH Redfern Trust
Postal Address	Level 18, 123 Pitt Street Sydney NSW 2000
ABN	14 865 262 365
Nominated Contact	Mark Albert Surtees, Development Manager

Wee Hur provides quality PBSA to tertiary students. Their existing and proposed facilities are strategically located close to universities, public transport and amenities within major capital cities. Their developments are designed based on the needs of students, providing a range of indoor and outdoor communal open spaces for students to interact and supporting amenities which create a conducive living environment.

Wee Hur is delivering over 5,700 beds of PBSA within Australia, including completed and approved projects in Adelaide, Brisbane, Canberra, Melbourne and Sydney. This includes two SSDAs approved by the DPIE for 11-23 Gibbons Street, Redfern and 90-102 Regent Street, Redfern.

1.2. PROJECT DESCRIPTION

This EIS is submitted to the DPIE on behalf of The Trust Company (Australia) Limited ATF WH Redfern Trust (**Wee Hur**) and in support of an application for SSD application number 12618001 at 104-116 Regent Street, Redfern.

The SSDA seeks consent for the construction of an 18-storey building accommodating a ground floor retail premises and student accommodation, including indoor and outdoor communal spaces, bicycle parking, associated building services and facilities and public domain improvements.

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 2**.

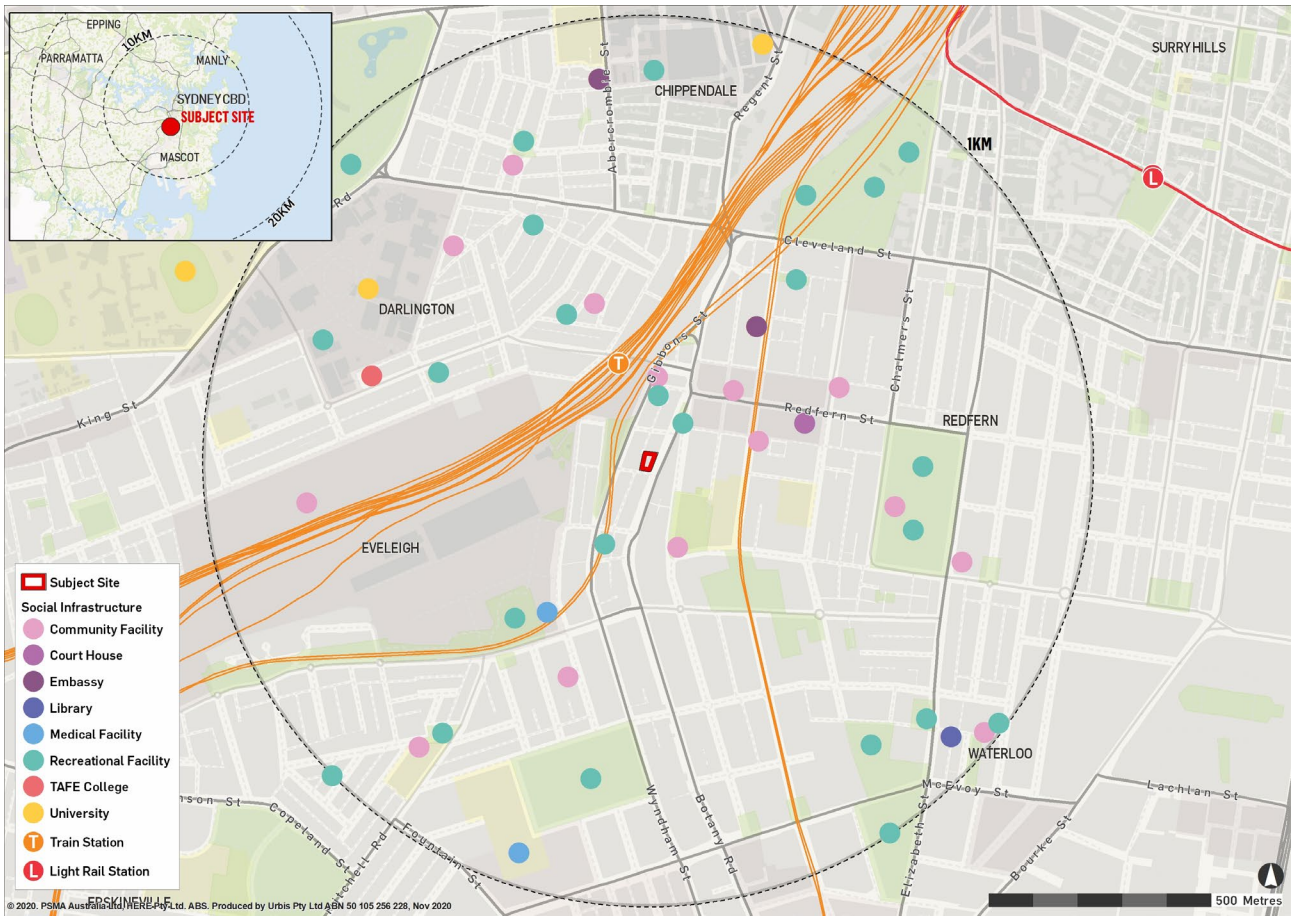
Table 2 Project Objectives

Project Objective	Proposed Development
To provide high-quality accommodation to tertiary students which are strategically located close to major universities, public transport and amenities.	The site is located within walking distance of the University of Sydney and University of Technology Sydney. The site is 300 metres walking distance to Redfern railway station which provides transport to a range of employment, entertainment and recreation destinations.

Project Objective	Proposed Development
Contribute to the delivery of 5,000 student accommodation beds across Australia and generate stable recurring income.	The proposed development will deliver 411 beds and 387 rooms. The proposal will complement the approved Wee Hur developments at 13-23 Gibbons Street and 90-102 Regent Street, which provide similar forms of development.
To develop PBSA with large communal spaces for students to interact and supporting amenities to create a conducive living environment.	The proposed development includes a variety of indoor and outdoor communal spaces for students to socialise, interact and study. These include large internal spaces on the ground, first and fourth floors with smaller internal spaces on Level 9 and Level 15. A range of communal open spaces are provided throughout the site, including significant public domain and landscaping works to William Lane, Level 2 recreational deck and the Level 16 sky park.

A map of the site in its regional setting is provided in the figure below.

Map 1 Regional Context



Source: Urbis 2021

Figure 4 Site Plan

Source: Urbis 2021

The proposed development has an estimated capital investment value of $52,800,000 (refer to **Appendix F**). Accordingly, the proposal is classified as an SSD under Schedule 2 of the SRD SEPP.

The Minister is the consent authority for the proposal in accordance with section 4.5 of the *Environmental Planning and Assessment Act 1979* (**the EPA Act**). Accordingly, this DA is being lodged with the DPIE as an SSDA seeking development consent for a mixed use development comprising retail premises and student accommodation with ancillary facilities and works.

This EIS has been prepared to support the SSDA and responds to the relevant matters listed within the SEARs issued on 8 February 2021 (refer to **Appendix A**).

1.3. PROJECT BACKGROUND

1.3.1. Relevant History

The site is currently vacant. It was formerly occupied by a service station development. In October 2020, development consent (D/2020/1095) was granted for the demolition of the existing service station equipment and retention of the two storey shop building, excavation and remediation.

In November 2021, development consent (D/2021/870) was granted for the demolition of the existing one and two storey shop buildings, switch room, kerb and footpaths on the site.

1.3.2. Key Strategies

The following key strategies have been adopted to avoid, minimise or off-set the impacts of the project:

- Following four SDRP meetings, Antoniades Architects redistributed the gross floor area of the proposal in response to contextual and urban considerations, specifically:

  - The podium has a nil setback to Regent Street which aligns with the approved 90-102 Regent Street podium and other developments further north and a minimum setback of 4.6m along Margaret Street to achieve an appropriate separation from St Luke's Presbyterian Church.
  - The tower form has been setback 7.6m from the southern boundary (greater than 4m required) to improve the relationship with St Luke's Presbyterian Church.
  - The southern tower steps down in height to improve the transition to the south and reduce potential impacts.
- No on-site car parking is provided to encourage use of active transport and public transport, in alignment with the NSW Government and City of Sydney strategic transport objectives. A Green Travel Plan has been prepared by The Transport and Planning Partnership (**Appendix N**).
- An unexpected finds protocol will be implemented in the unlikely event that unexpected finds occur during any activity within the study area, including cessation of all works in the vicinity. The find must be left in place and protected from any further harm.
- An Erosion and Sediment Control Plan will be prepared to minimise stormwater runoff.
- A Construction Pedestrian and Traffic Management Plan will be developed in consultation with TfNSW.

In summary, the proposed development has been designed to comply with the relevant State and local planning requirements and Australian standards and guidelines. The impacts to the natural environment can be mitigated, minimised or managed as summarised in **Section 6** and **Appendix E** and outlined in detail within the specialist reports appended to the EIS.

1.4. RELATED DEVELOPMENT

The land to the north and west along Regent Street and Gibbons Street is being progressively transformed from a low-rise traditional main street to a higher-density mixed-use environment. The table below provides a list of the SSDAs which have been (or are being) assessed by DPIE within the immediate locality.

Table 3 Development Approvals and Proposals – Surrounding Land

SSDA Reference	Address	Description	Determination
SSD-10382	90-102 Regent Street, Redfern	Construction of an 18-storey mixed-use development comprising student accommodation.	Approved 24 June 2021
SSD-9194	13-23 Gibbons Street, Redfern	Demolition of existing structures and construction of an 18-storey mixed-use student accommodation development with basement, comprising 488 student accommodation rooms and ground level retail.	Approved 6 October 2021
SSD- 9275	80-88 Regent Street, Redfern	Demolition of existing structures and construction of an 18-storey mixed-use student accommodation building comprising 265 student accommodation beds within 185 units, ground level retail and business premises.	Approved 4 October 2019
SSD-7749	11 Gibbons Street, Redfern	Construction of an 18-storey mixed-use development comprising 160 social and affordable housing apartments, and ground	Approved 10 September 2019

SSDA Reference	Address	Description	Determination
		floor commercial/retail, office and common facilities, and lot consolidation	
SSD-9516	56-58 Regent Street, Redfern	21 storey hotel including 112 hotel suites and 2 residences, bar and gaming area, lounge, rooftop breakfast bar	SEARS issued 31 August 2020 EIS currently being prepared
MP08_0112	7-9 Gibbons Street, Redfern	Construction of an 18-storey mixed use development comprising retail and commercial uses, a supermarket and residential apartments	Approved 22 October 2010

Source: DPIE, https://www.planningportal.nsw.gov.au/major-projects/projects

The proponent for this application at 104-116 Regent Street (Wee Hur) are also the proponent for the approved student housing developments on the adjoining properties at 90-102 Regent Street (SSD-10382) and 13-23 Gibbons Street, Redfern (SSD-9194).

The site was selected by Wee Hur based on the location within walking distance of major universities and high-frequency public transport. The built form controls also provided an appropriate scale and density to support the development of PBSA.

2. STRATEGIC CONTEXT

This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project.

2.1. PROJECT JUSTIFICATION

The proposed development is aligned with the State, district and local strategic plans and policies relevant to the site as outlined below.

2.1.1. Premier's Priorities

The NSW Premier' s Priorities comprise a set of 15 priorities that aim to deliver on key policy matters, including:

- A strong economy
- Highest quality education
- Well-connected communities with quality local environments
- Putting customer at the centre of everything we do
- Breaking the cycle of disadvantage.

The proposal will provide 220 jobs in construction and 5 jobs in operation. The proposal will cater for 411 students, many of whom are expected to be from overseas, supporting the post-COVID recovery of the tertiary education sector and NSW's strong economy. The proposal also includes the introduction of street trees and on-site landscaping, which will contribute to the 'Greening Our City' priority.

2.1.2. Future Transport Strategy 2056

The NSW Future Transport Strategy 2056 (**Transport Strategy**) sets the 40-year vision, directions and outcomes framework for transport mobility in NSW, to guide long-term transport investment. The Transport Strategy aims to preserve optionality for future users and travel behaviours and repurpose existing infrastructure and corridors to optimise their performance and maximise carrying capacity.

The vision and objectives relevant to the site and the proposed development are outlined below.

Encouraging active travel (walking and cycling) and using public transport

The proposed development seeks to deliver student accommodation close to existing and proposed rail services and existing bus services. 102 bicycle spaces will be provided on-site in lieu of car parking to reduce reliance on private vehicles and increase the use of active and public transport.

Connecting people to jobs, goods and services in our cities and regions

The proposed development supports the 30-minute city concept, where people can conveniently access jobs and services within 30 minutes by public or active transport. The proposal provides student accommodation development in an area which is well served by public transport, jobs, goods and services.

2.1.3. Better Placed – An integrated design policy for the built environment of New South Wales

Better Placed was prepared by the Government Architect NSW (**GANSW**) to deliver good design outcomes through desired architecture, public places and environments across NSW. The policy provides best practice design processes which align with a clear set of established objectives to achieve the best possible outcomes. A response to the seven applicable objectives is described in detail in the Design Report prepared by Antoniades Architects (**Appendix H**) and summarised below:

Better Fit: Contextual, local and of its place

The Design Report prepared by Antoniades Architects (refer **Appendix H**) provides a comprehensive assessment of the urban context, including the way in which the proposed built form, height, bulk and scale,

setbacks and interface responds to the existing, approved and likely future development within the surrounding locality and the public domain.

Following four SDRP meetings, Antoniades Architects redistributed the gross floor area of the proposal in response to contextual and urban considerations. The final design has been informed by its location and context. The proposal responds to the heritage church to the south and transitioning context to the north, through the distribution of mass across the site. The podium aligns with the approved 90-102 Regent Street development to the north.

Better Performance: Sustainable, adaptable and durable

The proposal aims to maximise indoor environmental quality outcomes, such as waste reduction and low environmental impact materials, while maintaining energy efficiency and providing easy access to transport and on-site bicycle facilities.

The design integrates landscaping across the ground floor, Level 2 and 4 terraces, and the Level 16 sky park. The proposed design also achieves high levels of natural ventilation and solar access to support ESD design.

Vipac Engineers have prepared a suite of documents to assess the sustainability and efficiency of the proposed development (**Appendix I**; **Appendix J**; **Appendix K**). The reports include a comprehensive range of initiatives to reduce energy consumption through the careful selection of materials. The Waste Management Plans (**Appendix L**) include management measures to reduce potential waste generation.

The development will have a low reliance on private vehicles, being located within a highly accessible location and with no on-site car parking to be provided. 102 bicycle parking spaces are provided on the ground floor to encourage and support active transport. The site is well-located close to employment precincts, high-frequency public transport and existing local services.

Better for Community: Inclusive, connected and diverse

The proposed development includes retail uses and common spaces for the student accommodation on the Ground Level and two building entries on Regent Street and Margaret Street to activate the interface of the building with the street frontages.

The proposal will provide communal spaces for residents to socialise and will contribute to active frontages along Regent and Margaret Streets. The proposed public domain works along William Lane will provide places to gather and socialise. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.

Better for People: Safe, comfortable and liveable

The proposed design incorporates an appropriate range of climatic experiences including shelter, communal open space, solar access and shade. The design also provides a range of flexible and adaptable spaces to accommodate a range of social and community activities by providing flexible spaces. The design optimises comfort and enjoyment through acoustic and thermal comfort and suitable lighting.

A Crime Prevention Through Environmental Design (**CPTED**) Assessment has been prepared by Elton Consulting (**Appendix M**). The CPTED Assessment makes recommendations relating to crime prevention elements and treatments to be incorporated in the development design to minimise risk or opportunities for crimes to occur.

Better Working: Functional, effective and fit for purpose

The design supports a fine grain urban form, where places are walkable of human scale with a mix of land uses including social infrastructure and local services. The proposed student accommodation will enable residents to live close to public transport, jobs and services.

The Design Report prepared by Antoniades Architects provides a comprehensive assessment of the environmental amenity outcomes for the proposed building, including access to natural daylight and ventilation, acoustic separation and access to landscape and outdoor spaces. Additional detailed information regarding these issues is provided in **Section 6.1.7**.

Better Value: Creating and adding value

The proposed development will provide 387 rooms and 411 beds available to students, close to major tertiary education campuses. The proposal will contribute to the development of a more accessible and

walkable city and integrates land uses with public transport. The proposal will contribute to the ongoing renewal of the Redfern-Waterloo precinct, with ground floor retail and active frontages along Regent Street, Margaret Street and William Lane.

The ground floor retail tenancy will provide a convenient retail space for local residents. The Design Report prepared by Antoniades Architects (**Appendix H**) demonstrates how the building could be adapted to a hotel/ apartment use in the future. The ground floor communal area could be transformed to a community orientated space for events.

Better Look and Feel: Engaging, inviting and attractive

The proposal will provide for communal spaces for residents to interact with landscaping that enhances the streetscape and the appearance of the site. The large ground floor communal area provides a range of uses for the residents, including a gym and study areas.

The proposal also includes public domain improvements, including street tree planting, paving and seating to contribute to active frontages along Regent Street, Margaret Street and William Lane.

In summary, the final design seeks to deliver a built form that is sustainable, functional and sensitive to its context as encouraged by objectives of Better Placed. The consistency of the proposal with the relevant objectives and principles is demonstrated in the Design Report (**Appendix H**) and as discussed in detail in Section 6 of this EIS.

2.1.4. Guide to Traffic Generating Developments (RMS)

The RMS Guide to Traffic Generating Developments (**RMS Guide**) prescribe the traffic generation considerations relating to major developments. The RMS Guide establishes the grounds for traffic impact assessment in terms of daily traffic volumes and peak traffic volumes for the residential and retail land uses.

The SSDA is accompanied by a Traffic Impact Assessment prepared by The Transport Planning Partnership (refer to **Appendix N**) which assesses the potential traffic impacts of the proposed development in accordance with the RMS Guide.

No specific traffic generation rates are provided for student accommodation, however, the assessment recognises the proposed development is targeted at students who do not own private vehicles and will walk, cycle or use public transport to nearby universities and local retail, commercial, entertainment and other services. Accordingly, no on-site parking is proposed.

Based on the above, the proposed development will generate minimal traffic and is considered acceptable based on its accessibility to pedestrian and cycle connections and existing and future high-frequency public transport. A Green Travel Plan has been prepared by The Transport Planning Partnership (**Appendix N**) to facilitate the implementation of the desired travel behaviours.

2.1.5. Development near Rail Corridors and Busy Roads – Interim Guideline

Development Near Rail Corridors and Busy Roads aims to facilitate the effective planning, design and assessment of development in or adjacent to rail corridors and busy roads. It addresses potential noise and vibration and air quality impacts from roads and railways, as well as safety, excavation, earthworks and other construction related issues.

The site is located on Regent Street which features high traffic volumes. The SSDA is accompanied by an Acoustic Report prepared by Acoustic Logic (**Appendix O**) and an Air Quality Impact Assessment prepared by RWDI Australia (**Appendix P**) which assess the potential noise and air quality impacts associated with the site proximity to Regent Street and the traffic volumes along this arterial road.

The recommended mitigation measures within each of these reports have been incorporated into the proposed development, including minimum glazing thicknesses to achieve the required noise criteria. Each of these matters are discussed in further detail within **Section 6.2.1** and **Section 6.2.2**.

2.1.6. Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan (**GSRP**) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key

challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The GSRP provides broad Priorities and Actions which focus on four key themes - infrastructure and collaboration, liveability, productivity and sustainability. The directions and objectives of relevance to the site and the proposed development and the way in which they have been responded to within the proposal are outlined in the table below.

Table 4 GSRP Compliance

Planning Objective	**Proposal**
Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods	The proposed student accommodation will provide housing diversity in a highly accessible location. The site is 300 metres walking distance to Redfern railway station which provides transport to a range of employment, entertainment and recreation destinations. The proposal will provide communal spaces for residents to socialise and will contribute to active frontages along Regent and Margaret Streets. The proposed public domain works along William Lane will provide places to gather and socialise. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.
Objective 10: Greater housing supply	The Plan recognises the importance of housing supply and demand by responding to needs, choice and demographic characteristics of the existing and future community. The proposed development will deliver 411 student housing beds within the Redfern to Eveleigh urban renewal corridor and in proximity to a range of services, by active or public transport.
Objective 11: Housing is more diverse and affordable	The proposed development will provide 387 rooms and 411 beds for students in proximity to major tertiary education campuses. The proposal will contribute to the development of a more accessible and walkable city and integrates land uses with public transport.
Objective 12: Great places that bring people together	The Greater Sydney Region Plan supports a fine grain urban form, where places are walkable of human scale with a mix of land uses including social infrastructure and local services. The proposed public domain works along William Lane will provide places to gather and socialise. The proposed student accommodation will enable residents to live close to public transport, jobs and services.

In summary, the proposal broadly supports the directions in the Greater Sydney Region Plan by increasing the supply of housing for students in proximity to major tertiary education campuses. It contributes to the development of a more accessible and walkable city by integrating land uses with public transport and the urban renewal of the Redfern-Waterloo precinct.

2.1.7. Eastern City District Plan

The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

Figure 5 Eastern City District Structure Plan

Source: Greater Sydney Commission

The site is centrally located between the Harbour CBD and Sydney Airport within the Eastern Economic Corridor as outlined by the yellow shading in the plan extract above. It also benefits from access to the future Sydney Metro line which is shown by the solid blue line. The planning priorities and actions likely to have implications for the proposed development are discussed below.

Table 5 Eastern City District Plan Compliance

Planning Priority	Proposal
Planning Priority E5: Providing housing supply, choice and affordability with access to jobs, services and public transport	The proposed development will contribute to the provision of 411 student housing beds with high levels of walkability and good transport connections, close to tertiary education institutions.

Planning Priority	Proposal
Planning Priority E6: Creating and renewing great places and local centres, and respecting the District's heritage	The proposal will contribute to the ongoing renewal of the Redfern-Waterloo precinct. The proposal includes ground floor retail and active frontages along Regent Street, Margaret Street and William Lane, contributing to the activation and revitalisation of Redfern.
Planning Priority E8: Growing and investing in health and education precincts and the Innovation Corridor	The subject site is within the Eastern City Innovation Corridor. Competitive innovation precincts depend on high levels of amenity and walkability, with good transport connections spurring the rapid exchange of ideas and the establishment of networks. The proposed development will support the Innovation Corridor by providing student accommodation within walking distance of several tertiary institutions.
Planning Priority E10 Delivering integrated land use and transport planning and a 30-minute city	The proposal will facilitate the integration of land use and transport planning and contributes to the creation of a walkable and 30-minute city. The proposal provides a mixed-use development with student accommodation which has been appropriately integrated in an area which is well served by public transport, jobs, goods and services.

2.1.8. City of Sydney Local Strategic Planning Statement

City Plan 2036: Local Strategic Planning Statement (**Sydney LSPS**) provides the framework for the City of Sydney to undertake land use planning and decision making over the next 20 years. This planning statement contains 13 planning priorities organised by the central themes of infrastructure liveability, productivity, sustainability and implementation as outlined in the Greater Sydney Region Plan and District Plans.

The planning priorities which are relevant to the site and proposed development are discussed in the table below.

Table 6 Sydney LSPS Compliance Table

Planning Priorities	Proposal
Movement for walkable neighbourhoods and a connected city	The proposed development includes additional retail along Regent Street and 411 student housing beds within close walking distance of existing retail, commercial and community services. The site is well-located close to existing and proposed public transport services, including Redfern railway station, the future Sydney Metro station at Waterloo and existing bus services. 102 bicycle parking spaces will be provided on-site in lieu of on-site car parking, encouraging active transport and reduced reliance on private motor vehicles.
Creating great places	The proposed development is located within an accessible local centre. The proposed building has been carefully sited and designed to deliver design excellence and a high level of amenity within the built

Planning Priorities	Proposal
	environment. The proposal will provide for communal spaces for residents to interact with landscaping that enhances the streetscape and the appearance of the site. The proposal also includes public domain improvements, including street tree planting, paving and seating to contribute to active frontages along Regent Street, Margaret Street and William Lane. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.
New homes for a diverse community	The proposal will deliver 387 rooms, comprising a total of 411 beds for tertiary students. The proposed development will contribute to the ongoing delivery of a diversity of housing within the locality, including terrace housing, multi-dwelling housing, low and high-rise apartments and student accommodation. The proposed increase in the local student population will contribute to economic growth and development of the precinct.

2.1.9. Sustainable Sydney 2030

Sustainable Sydney 2030 outlines the City of Sydney vision for sustainable development within the Sydney LGA to 2021. The vision is based on three overarching goals of green, global and connected, and is guided by ten strategic directions and ten sustainability targets.

The proposal will facilitate the regeneration of the site, delivering new student accommodation and employment opportunities in an inner urban area with good access to existing transport networks. The proposed development has been designed to contribute to relevant targets and is consistent with the strategic directions, as outlined in the table below.

Table 7 Sustainable Sydney 2030 Compliance

Direction	Proposal
Direction 1 – A Globally Competitive and Innovative City	The proposal will provide student accommodation within walking distance of tertiary institutions including University of Sydney, University of Technology Sydney (UTS), TAFE NSW Ultimo Campus and Notre Dame University Sydney. The proposal will support the tertiary education sector and its significant contribution to the NSW and Australian economies.
Direction 3 – Integrated Transport for a Connected City	The site is within a highly accessible location and is 300 metres from Redfern railway station and 350 metres from the future Waterloo Sydney Metro station. The site is also within walking distance of numerous bus routes on Regent Street, Redfern Street and Gibbons Street, providing access to the eastern, southern and inner-western suburbs.
Direction 4 – A City for Walking and Cycling	The proposal provides 102 bicycle parking spaces in lieu of on-site car parking to encourage active transport and reduce reliance on private motor vehicles for transport.

Direction	Proposal
	The site is located close to employment, shops and services, providing opportunity for walking and cycling to be the dominant modes of transport for its future occupants.
Direction 5 – A Lively, Engaging City Centre	The proposed development includes retail uses and common spaces for the student accommodation on the ground level that will create an active frontage. The proposed public domain improvements include new street trees, paving and seating along William Lane will contribute to the activation of the public spaces and social interaction between the building occupants and the locality.
Direction 8 – Housing for a Diverse Population	The proposal will increase the housing options available to tertiary students within walking distance of major educational institutions within Sydney. The proposal includes 387 rooms which will provide for a total of 411 students in single studios and en-suite rooms and two-bedroom configurations.
Direction 9 – Sustainable Development, Renewal and Design	The proposal aims to maximise indoor environmental quality outcomes, such as waste reduction and low environmental impact materials, whilst maintaining energy efficiency and providing easy access to transport and bicycle parking. The development will have a low reliance on private vehicles, being located within a highly accessible location and with no on-site car parking to be provided. The site is well-located close to employment precincts, high-frequency public transport and existing local services, facilitating the delivery of the Green Travel Plan which seeks to provide for a high level of walking and cycling.

2.1.10. Central to Eveleigh Urban Transformation Strategy

The *Central to Eveleigh Corridor Strategy* guides the key strategic urban renewal of approximately 50 hectares of land in and around the rail corridor from Central to Erskineville railway stations.

The Strategy was released by UrbanGrowth NSW in November 2016 and was used to guide district planning undertaken by the Greater Sydney Commission and local planning led by Transport for NSW and the Department of Family and Community Services.

The proposed development is consistent with the key moves identified within the Strategy as summarised below.

Key Move 9 – Integrate new high-density mixed use buildings with existing neighbourhoods and places

The proposal seeks to optimise the development potential of the site as outlined within the Strategy. It provides for a high-density development comprising an FSR of 7:1 and a maximum building height of 18 storeys, consistent with the SSD SEPP. Careful consideration has been given to the building design, particularly at the podium level, so the proposed development will integrate with the existing streetscape. Public domain improvements will enhance the appearance and functionality of the public spaces.

Key Move 10 – Deliver a diversity of housing choice, tenure and price points

The proposed development will contribute to the ongoing delivery of a diversity of housing within the locality, which includes terrace housing, multi-dwelling housing, low and high-rise apartments and student accommodation. The proposed use of the site for student accommodation is considered entirely appropriate as it will optimise its location within easy walking distance of major tertiary institutions, high-frequency public transport and existing local services.

2.1.11. Redfern-Waterloo Built Environment Plan (Stage One)

Redfern Waterloo Built Environment Plan Stage 1 (**BEP**) sets out the strategic land use and urban design principles for the sites identified in the State Significant Precincts SEPP. The proposed development aligns with the BEP by:

- Strengthening the connection between Redfern and nearby university campuses.
- Supporting local employment.
- Providing additional housing and housing choice.
- Activating the street fronts.
- Incorporating a podium design that is consistent with the traditional character of area.

The proposal is generally consistent with the land use and design concepts for the Redfern town centre precinct (Redfern Railway Station, Gibbons and Regent Streets). The proposal supports the objectives for character and urban scale in the centre by:

- Providing new retail spaces that further activate the Regent Street ground plane.
- Providing for passive surveillance of all public spaces in the vicinity of the site by addressing windows at upper levels toward the street.
- Maintaining the established character and scale of the Regent Street frontage by incorporating a podium design.
- Delivering public domain improvements including street furniture and street tree planting.

2.1.12. Redfern Centre Urban Design Principles

The *Redfern Centre Urban Design Principles* (**UDP**) were developed by the Redfern-Waterloo Authority in 2009 to provide additional detail regarding design excellence for future development in accordance with the Redfern-Waterloo State Significant Sites under clause 22 of Part 5 of Schedule 3 of the SSP SEPP.

The principles apply to the area generally bounded by Marian Street, Margaret Street, Regent Street and Lawson Square. The proposal has been assessed in accordance with the relevant provisions for high-rise development as outlined in **Table 8**.

Table 8 Consistency with Redfern Centre Urban Design Principles

Planning Control	Comment	Compliance
3.2.1 Building Height ▪ 18 storeys to centre of site ▪ 3 storeys along Margaret Street ▪ 2 storeys along Regent Street	The proposed development has a maximum building height of 18 storeys with a three storey podium along both Regent Street and Margaret Street, which is consistent with the adjoining developments to the north and west. The tower component is setback part 4m and part 8m to Regent Street and a minimum of 5.6m to Margaret Street, resulting in a variation to the height requirements prescribed by the SSP SEPP.	Acceptable on merit

Planning Control	Comment	Compliance
	The proposed variation is fully justified within a Clause 16A Variation Request (refer **Appendix Q**) and as summarised below: ▪ The proposed built form is compatible and consistent with the approved development to the north along Regent Street. ▪ The three storey podium component provides a fine grain architectural outcome and a human-scale pedestrian environment. ▪ The proposed setbacks to the tower component will provide an attractive streetscape with a continuous built form along Regent Street.	
3.2.2 FSR Maximum 7:1	The proposed FSR is 7:1 which complies with the SSP SEPP and the UDP.	Yes
3.2.3 Minimum site area 1,400 sqm	The site has an area of 1,366m² which is 34m² less than the minimum site area prescribed by the UDP. The minor variation to the minimum site area requirement is considered entirely appropriate and justified based on the following: ▪ The site benefits from three street frontages to Regent Street, Margaret Street and William Lane, with only the northern boundary immediately adjoining another property. ▪ The proposed development has been sited and designed to avoid unacceptable impacts on adjoining and surrounding developments, including increased setbacks along the southern boundary to respond to the heritage listed church building. ▪ The proposed development has been designed to provide for significant public domain improvements along Regent Street, Margaret Street and William Lane. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.	Acceptable on merit
3.2.4 Building separation Each development to provide minimum of 50% of required	The building separation plans prepared by Antoniades Architects in the Architectural Plans (**Appendix G**) demonstrate the way in which the building has been sited and designed to provide	Acceptable on merit

Planning Control	Comment	Compliance
separation distance measured from centre line of the road. For tower elements above the street wall, separation distance between non-habitable rooms is to be: ▪ 13m below 8 storeys ▪ 18m in excess of 8 storeys. Design for view sharing by residents and office workers of existing views across southern edge of city and district views to east, west and south New development to provide a high quality visual appearance when viewed from surrounding areas.	appropriate separation between the tower and the existing and approved buildings to the north and west the site, considering potential visual and privacy impacts and optimising the distance between the tower and the buildings to the south. Where separation distances are less than the recommended distances within the UDP, privacy mitigation measures are included to avoid adverse impacts on visual privacy. Antoniades Architects have designed hoods to the windows facing William Lane and 90-102 Regent Street to maximise visual privacy.	
3.2.5 Podium design Podiums are to be provided to all towers (built form over 6 storeys). ▪ Front setback – nil setback ▪ Side boundary – nil setback ▪ William Lane - 0.8m to provide for footpath widening	Nil setbacks are proposed to the front boundary (Regent Street) and side boundary (adjoining 90-102 Regent Street). A 0.8m setback is provided to William Lane, aligned with the adjoining development to the north. A nil setback is provided along the balance of the side boundary (which adjoins 13-23 Gibbons Street), with significant public domain works improvements associated with the extension of the approved through-site connection to Margaret Street. This includes new street trees, paving and seating to activate the public space and provide social interaction between the building occupants and the locality. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.	Yes
3.2.6 Tower design Setbacks above street level are: ▪ 8 metres to Regent Street. ▪ 4 metres to Margaret Street New development is to provide articulation and interest to all facades of the buildings.	The tower design has a part 4m and part 8m setback to Regent Street. The northern component (with the 4m setback) is aligned with the approved building to the north at 90-102 Regent Street. The southern component (with the 8m setback) complies with the UDP and provides for sightlines to the church building to the south. A detailed justification for the proposed building setback along Regent Street is provided in the Clause 16A Variation Request attached as **Appendix Q**.	Acceptable on merit

Planning Control	Comment	Compliance
	The podium to Margaret Street is setback 4m and the tower component is setback 5.6m to provide a transition to the adjoining church building. The building facades have been designed to provide articulation and interest as outlined in the architectural drawings and the photomontages.	
3.2.7 Floor to floor heights Refer to the ADG for the required floor to ceiling heights for residential buildings (4m for ground floor retail, 3.3m for mixed use and 2.7 for residential use)	The floor to ceiling heights are as follows: ▪ Variable height across ground floor (3.8m) ▪ 2.7m for residential units above. The minor noncompliance in ground floor ceiling heights does not compromise the natural ventilation or solar access of the retail tenancy or communal areas. The 3.8m floor to ceiling height satisfactorily responds to current provisions within the Apartment Design Guide for mixed-use buildings (3.3m on ground floor).	Acceptable on merit
3.2.8 Skyline/ rooftop design Tops of towers to be designed to provide a dramatic silhouette. Roof mounted plant rooms, air conditioning units and other services and equipment shall be screened from view.	The roof top services are screened from view using integrated roof structures and architectural elements.	Yes

Overall, the proposed development satisfactorily responds to the way in which the Urban Design Principles have been applied to the recently constructed and approved developments within the locality, including the immediately adjoining buildings to the north (90-102 Regent Street) and west (13-23 Gibbons Street).

2.1.13. Connecting with Country Draft Framework

The Connecting with Country Draft Framework is a system for developing connections with Country that will inform the planning, design, and delivery of projects in NSW. The framework seeks to improve the health and wellbeing of Country to achieve three strategic goals:

- Reduce the impacts of natural events such as fire, drought, and flooding through sustainable land and water use practices
- Value and respect Aboriginal cultural knowledge with Aboriginal people co-leading design and development of all NSW infrastructure projects
- Ensure Country is cared for appropriately and sensitive sites are protected by Aboriginal people having access to their homelands to continue their cultural practices.
- The project team engaged WSP to facilitate engagement with Gadigal Elders. A Connection with Country Report was prepared by WSP (**Appendix GG**) to document Connection to Country principles, activities and engagements that have been undertaken to shape the design.

A response to the statement of commitment and principles for action (contained within the Connecting with Country Draft Framework) is provided in the table below.

Table 9 Response to Statement of Commitment and Principles

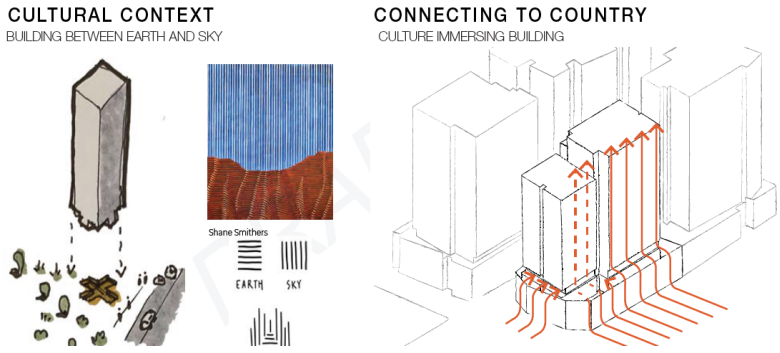
Principles for Action	Response
Connect with Country through first languages in collaboration with local community groups and their recognised Aboriginal knowledge-holders. Incorporate shared histories of cultural landscapes into project design principles.	Through the ongoing co-design process and engagement of Gadigal Elders, a range of design outcomes have been influenced by Indigenous culture. These include: ▪ Gadigal weaving: Nadeena Dixon, Gadigal Elder and artist recommended the incorporation of a weaving pattern to signify the traditional custodians who used weaving day to day. The weaving pattern has been replicated in the podium façade and the external and internal floor treatments. ▪ Mundoie Footprint' way-finding concept: Uncle Allan Madden Gadigal Elder recommended the incorporation of footprint patterns for users of the building the pathway to follow when moving through. ▪ Indigenous Planting: further consultation with indigenous landscape architect Lilly Madden will be undertaken during detailed design. ▪ Installation of a mural on the southern façade to inform pedestrians.
Connect with Country by engaging with, and responding to, cultural practices led by community groups and their recognised Aboriginal knowledge holders with spiritual links to Country	Consultation with Gadigal Elders will be ongoing as the project progresses.
Include impacts to Country and culture when evaluating economic, environmental, and social benefits and disadvantages of the project.	The Statement of Commitment prioritises financial and economic benefits through engagement of Gadigal Elders and Knowledge Holders. The engagement of Indigigrow and Lilly Madden as consultants will facilitate consideration of impacts to Country and culture when evaluating economic, environmental, and social benefits and disadvantages of the project.
Develop indicators to measure impacts to Country and culture during project formation.	Indicators to measure impacts to Country and culture will be developed in consultation with WSP and Gadigal Elders during the detailed design phase.

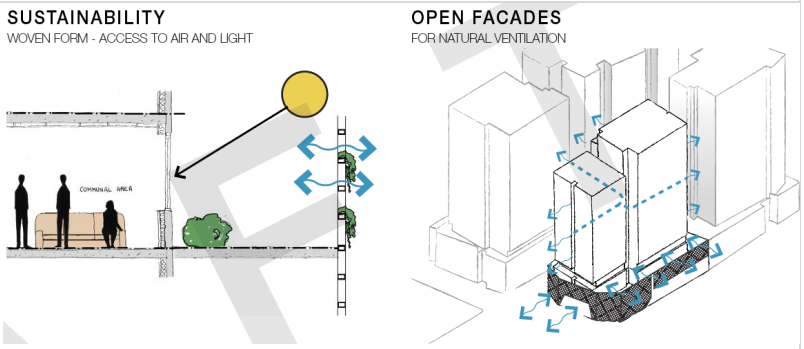
Each of the above matters is discussed in further detail within Section 6.1 of this EIS, including the way in which the Connecting with Country Draft Framework has informed the final built form and urban design.

2.1.14. Designing with Country Discussion Paper

The Designing with Country Discussion Paper was finalised by the GANSW in March 2020. GANSW's research suggests three essential elements of designing with Country: nature, people and design. The response to each of these three elements is provided in the table below.

Table 10 Elements of Designing with Country

Element	Project Response
Architecture considers design and people (informed by nature).	Through consultation with WSP and Gadigal Elders, Antoniades Architects have developed a scheme that celebrates and conencts to Country. This is achieved through the incorporation of a weaving pattern through the podium façade and the external and internal floor treatments. 
Passive design considers design and nature, and when used by people becomes environmental design.	WSP provided recommendations to the deisgn, including opening up the site. Key principles include bringing people closer to the site and teaching them about Gadigal and Aboriginal culture. Antoniades Architects have incorporated this recommendation by providing cultural experiences through the building, including use of Aboriginal symbols throughout the building.  Antoniades Architects have also incorporated WSP recommendations to open the site up by utilising open facades to improve natural ventilation.

Element	Project Response
	
Biophilic design considers the innate relationship between people and nature. Informed by design, this relationship could be understood as a genesis for Indigenous architecture.	Antoniades Architects have integrated WSP recommendations for biophilic design by designing a building using ecological sustainable development principles. The design receives high levels of solar access and natural ventilation. The proposed landscaping incorporates many indigenous species and is integrated throughout the building. 

Each of the above matters is discussed in further detail within Section 6.1 of this EIS, including the way in which the Connecting with Country Draft Framework has informed the final built form and urban design.

2.2. KEY FEATURES OF SITE AND SURROUNDS

The street address is 104-116 Regent Street, Redfern. The legal description of the site is Lot 10 in Deposited Plan 1026349. A site survey showing the geographic features and contours of the site is provided in **Appendix R**.

The site is located on the corner of Regent and Margaret Streets, with secondary vehicle and service access provided from William Lane. The site is connected to all necessary services including electricity, gas, water, communications, drainage and sewerage. A site location map and photographs are provided below.

Figure 6 Site Location Map

Source: Urbis

Figure 7 Site Photograph

Source: The Trust Company (Australia) Limited ATF WH Redfern Trust

The site is located along the primary north-south commercial spine which extends along Regent Street parallel to the adjacent railway line. The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in the table below.

Table 11 Key Features of Site and Locality

Descriptor	**Site Details**
Land Configuration	The site has an area of 1,366m² and falls by approximately 2.5m, north to south.
Land Ownership	The site is owned by The Trust Company (Australia) Limited ATF WH Redfern Trust.
Existing Development	The site is currently vacant. It was previously occupied by a service station development. In October 2020, development consent (D/2020/1095) was granted for the demolition of the existing service station equipment and retention of the two storey shop building, excavation and remediation.
Local Context	The surrounding locality is described below: ▪ **North**: the development immediately to the north currently comprises two to four storey buildings which are approved for demolition in association with a recent approval for an 18 storey retail and student accommodation development at 90-102 Regent Street (SSD-10382 dated 24 June 2021). Further north comprises recently completed and approved mixed-use development, including student accommodation. Redfern railway station is located to the north-east along Gibbons Street. ▪ **East:** Development to the east primarily consists of attached buildings between two to four storeys in height, with commercial uses on the ground floor. ▪ **South:** South of Margaret Street is the heritage-listed St Luke's Presbyterian Church and two-storey mixed use terraces with commercial uses along the ground floor. ▪ **West:** The site on the corner of Margaret Street and Gibbons Street is currently vacant, with construction of an 18 storey mixed use student accommodation building due to commence shortly at 13-23 Gibbons Street (SSD-9194). Photographs of the surrounding land uses are provided in the figure below.
Regional Context	The site is located within Redfern, approximately three kilometres south of the Sydney CBD. The immediate locality is undergoing significant redevelopment and gentrification, with a mixture of land uses, building typologies and housing stock.
Infrastructure	The site is highly accessible to public transport services. Redfern Railway Station is approximately 300 metres walking distance from the site and provides rail service connections to destinations across Sydney. A new Sydney Metro station is located at the corner of Raglan Street and Cope

Descriptor	Site Details
	Street, approximately 400m walking distance from the subject site. Bus stops in the immediate locality provide connectivity to surrounding suburbs in the east, south and city. An off-road shared path along Gibbons Street and Marian Street provides cycle linkages to Redfern Station, the University of Sydney, University of Technology Sydney, University of Notre Dame, TAFE and Sydney CBD. Pedestrian access is provided along both Margaret Street and Regent Street. Regent Street is a one-way southbound State Road and Gibbons Street is a one-way northbound State Road, parallel to Regent Street. Margaret Street is a two-way local road that connects Regent Street and Gibbons Street.
Site Access	The site has a primary street frontage, 35.65m in length, to Regent Street to the east. The secondary frontages comprise 23.8m in length to Margaret Street to the south and 10.195m to William Lane to the north-west. There are existing vehicle crossovers to the site from Margaret and Regent Streets which formed part of the former service station access and are now redundant.
Easements and Covenants	An easement to drain water exists along the western boundary of the site and is 1.8m wide. Refer to the Deposited Plan at **Appendix PP**.
Services	Arcadis prepared an Infrastructure Report (**Appendix S**) that identifies the existing services and infrastructure within the vicinity of the site, establishes the impact on existing utility assets from the proposed development and the proposed augmentation connection required to service the proposal. The proposed infrastructure requirements to service the proposed development are summarised below. ▪ **Electrical**: The calculated maximum demand for the development based on VA/sqm allowance is approximately 883kVA. A new 1MVA mini chamber substation is proposed to be installed as part of the development. A formal application requesting “Design Information Package” (DIP) will be made to Ausgrid during the detail design stage. ▪ **Communications**: The DBYD results indicate there are optic fibre connections in the vicinity of the site. Superloop (internet provider) is currently upgrading their service in the vicinity of the site and as part of these works will provide for a connection to the new building. ▪ **Water**: The existing 150DICL water main running along Regent Street has insufficient pressure to service the development. Therefore, a Water Services Co-ordinator (WSC) will be engaged to design and project manage the works including a section 73 application to Sydney Water, following lodgement of the SSDA documentation.

Descriptor	Site Details
	▪ **Sewer**: Based on 80% of the total potable demand being disposed of through the sanitary system it is anticipated that the peak sanitary flow would be approximately 8.4L/s. The sanitary drainage is proposed to be connected into relocated sewer main running through William Lane, provision has been made to accommodate this in the design of the sewer relocation. ▪ **Gas**: The Ausgrid plans indicate the primary gas main comprises a 75NY 210kPa Jemina gas main which runs along Regent Street. A new lead in gas connection will be provided as part of the proposal.
Acid Sulfate Soils	The Geotechnical Investigation prepared by Douglas Partners (**Appendix FF**) confirms the site does not lie within an area known for acid sulfate soils.
Contamination	Several environmental investigations have been carried out on the site dating from 1999 to 2021. These investigations have confirmed that a limited extent of soils aesthetically impacted with petroleum hydrocarbons will be present in proximity of the site UPSS. A Remediation Action Plan (**RAP**) relating to the site, an Addendum RAP and a letter of interim advice from an accredited site auditor was submitted with a local DA for the decommissioning of the petrol tanks (D/2020/1095). A Site Audit Statement has been submitted which confirms that the remediation and validation works have been completed in accordance with the Remedial Action Pan as prepared for the site (**Appendix BB**). Refer to **Section 6.1.10** for further discussion.
Stormwater and Flooding	A Flood Impact Assessment Report prepared by WMA Water (**Appendix EE**) finds the site is not inundated during the major storm event 100 years average recurrence interval (ARI). Refer to **Section 6.1.13** for further discussion. JHA Consulting Engineers have prepared a Stormwater Management Report (**Appendix T**) which sets out the stormwater management works. A summary of the assessment and recommended mitigation measures is provided in **Section 6.1.14**.
Bushfire Prone Land	The site does not comprise bushfire prone land.
Flora and Fauna	A desk-top assessment prepared by Greentape Solutions confirmed the site contains no threatened species habitat or vegetation and the proposal will not require any clearing of native vegetation. The only *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC**) listed species and Matter of National Environmental Significance (**MNES**) recorded occurring at and/or near the site is the Grey-headed flying-fox.

Descriptor	Site Details
	This species is nomadic an itinerant and likely feeding on local vegetation within the inner-city green zones. There are no habitat features within the development site suitable for this species. A survey was also undertaken of the site on 23 March 2021 which confirmed there was no evidence of microbats within the buildings. A BDAR waiver was issued by the NSW DPIE on 22 June 2021 and a BDAR is not required to be prepared and submitted as part of this SSD application (refer to **Appendix U**).
Aboriginal Heritage	Gadi land extends from Burrawara (South Head) through to Warrane (Sydney Cove), Gomora (Cockle Bay-Darling Harbour) and possibly to Blackwattle Creek, taking in the wetland sand and dunes now known as Redfern, Erskineville, Surry Hills and Paddington, down to the Cooks River. An Aboriginal Cultural Heritage Assessment (ACHA) report has been prepared by Artefact Heritage (**Appendix V**). A field survey inspection identified that the entirety of the study area is covered by a variety of urban materials including concrete resulting in no visibility across the study area. No sites or areas containing potential archaeological material were identified within the study area. Refer to **Section 6.1.12** for further discussion.
European Heritage	The subject site is not listed as an item of environmental heritage or located within a heritage conservation area. However, the former St Luke's Presbyterian Church (including its interior), located immediately south of the site at 118 Regent Street, is listed as a heritage item in the Sydney LEP. A Heritage Impact Statement has been prepared by Weir Phillips Heritage and is provided at **Appendix W**. Refer to **Section 6.1.11** for further discussion.

Figure 8 Locality Photographs

Picture 1 St Luke's Presbyterian Church (opposite the site)

Picture 2 Iglu Development to the north of the site

Picture 3 Development opposite the site on Regent Street

Picture 4 Current development at 13-23 Gibbons Street

Source: Urbis

2.3. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within the Redfern-Waterloo Authority precinct which is undergoing significant redevelopment and gentrification, with a mix of land uses, building typologies and housing stock. The proposed development is generally consistent with the transition of development within the locality, particularly the land immediately to the north and west which is affected by the same planning framework.

Approved and likely future developments relevant in the cumulative impact assessment of the proposal are summarised in the following table.

Table 12 Approved and Likely Future Developments

SSDA Reference	Address	Development Description	Current Status
SSD-10382	90-102 Regent Street, Redfern	Construction of an 18-storey mixed-use development comprising student accommodation.	Approved 24 June 2021

SSDA Reference	Address	Development Description	Current Status
SSD-9194	13-23 Gibbons Street, Redfern	Demolition of existing structures and construction of an 18-storey mixed-use student accommodation development with basement, comprising 488 student accommodation rooms and ground level retail.	Approved 6 October 2021
SSD-9516	56-58 Regent Street, Redfern	21 storey hotel including 112 hotel suites and 2 residences, bar and gaming area, lounge, rooftop breakfast bar	SEARS issued 31 August 2020 EIS currently being prepared

The potential cumulative impacts of the project are addressed in **Section 6** of the EIS in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

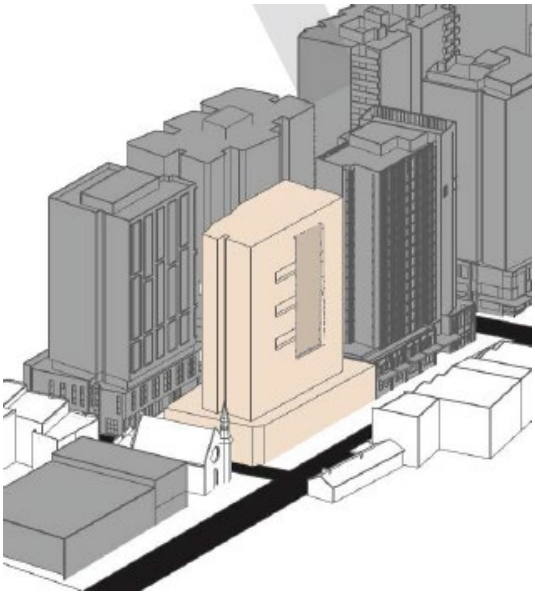
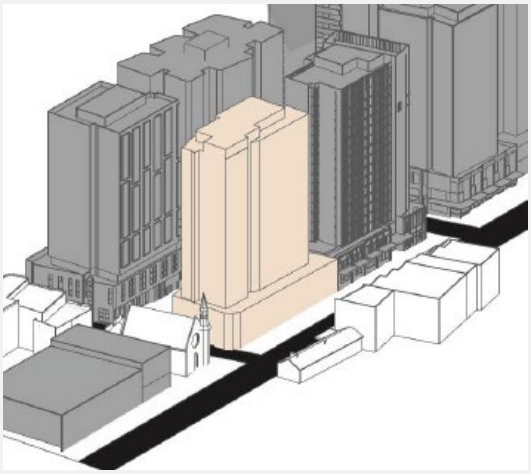
2.4. FEASIBLE ALTERNATIVES

Clause 7 in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

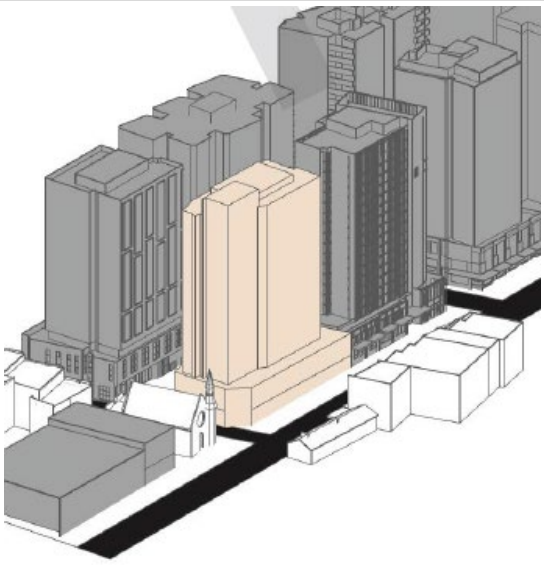
Wee Hur and Antoniades Architects identified a number of project alternatives which were considered in respect to the identified need for the student housing development, including the detailed design reviews undertaken in preparation for, during and following the SDRP meetings. Each of the options is listed and discussed in the following table.

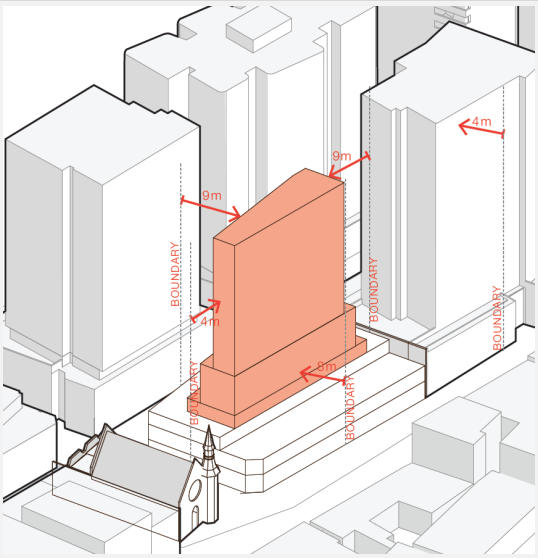
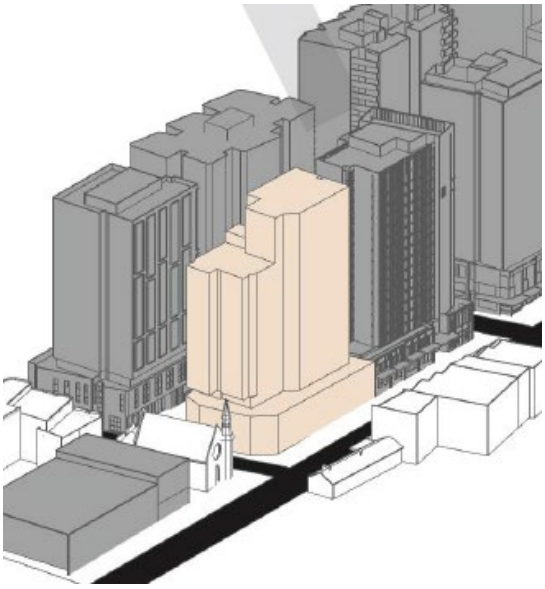
Table 13 Project Alternatives

Option	Assessment
Option 1 – Do Nothing	An option to leave the site in its current condition and 'do nothing' was considered and dismissed. This option is inconsistent with the project objectives to deliver high quality housing for tertiary students. Further, it would result in an underutilisation of the site that is inconsistent with strategic planning policy and the revitalisation of the precinct to support housing and employment growth.
Option 2 – Original Design	Consideration was given to a podium design generally built to the site boundaries. However, this option was discounted based on the potential impacts on the heritage listed church building to the south. This option also failed to optimise the public domain improvement opportunities at the ground plane, including improved pedestrian and cycle connectivity from Margaret Street to William Lane and integration with the approved through-site connection on the adjoining site at 13-23 Gibbons Street.
Option 3 – Alternative Building Designs	A series of alternative building designs were prepared and considered by the SDRP between March 2021 and September 2021. The key features of each option and feedback provided by the SDRP is summarised below, including an option which fully complied with the relevant building setbacks and separation distances.

Option	Assessment	
Option 3A	Aboriginal Influence Initial meeting with local Aboriginal artist to discuss opportunities for further engagement on this site and project. Massing / Setback / Form Developing a tower form that presents an alignment to the existing and proposed tower forms along Regent and Margaret Street. Public Domain Increased setbacks at podium level to the west aspect of the site fronting William Lane to enhance and provide public domain benefit to the proposed through site link. Feedback from the SDRP included: ▪ Connecting with Country should underpin the whole site response. The proposal did not respond to the unique heritage Redfern. ▪ A 3 or 4 storey podium is to be explored. ▪ Massing and form of the building was not supported. The transition in scale from St Luke's Church to the tower form was not appropriate.	
Option 3B	Aboriginal Influence Adoption of a weaving pattern in recognition of the important cultural practice that has specific and unique characteristics to Country. Massing / Setback / Form Greater focus at the precincts finer grain, detail, and character undertaken to direct and inform design considerations. Massing and setback studies undertaken (4m-8m) on Regent Street to demonstrate the solar/massing and alignment impacts on this site and surrounding buildings.	

Option	Assessment	
	Public Domain Development of public domain along William Lane including integration of connection to Country specific plant and tree species, water management and place making. Architecture Vertical blades along Regent Street façade solar access and act as mitigation of wind tunnelling. A finer/coarser grain relationship is established to define and break up the Regent Street façade. Three storey street wall developed to create strong corner response. Feedback from the SDRP included: ▪ Concept for William Lane public domain area not fully realised. ▪ Input from Gadigal Elders should be incorporated into the actual design of the building. ▪ Substantially different versions demonstrating options testing was not presented. ▪ Explore options to put more bulk in the podium, with reductions to the public space to William Lane, allowing the tower a greater setback to Margaret Street and St Luke's Presbyterian Church.	

Option	Assessment	
Option 3C	Aboriginal Influence Opportunity to connect and expand upon the through site link to provide a public domain that allows Aboriginal knowledge to be integrated into the landscape and architecture. Massing / Setback / Form Continued exploration of built form and fit taking into account separation, streetscape appreciation, public domain benefit and understanding how efficient or inefficient each scenario performs in its prescribed use. Public Domain Development in the design with consideration paid to the interface between internal programme and the public domain by: ▪ Relocating secondary entry from William Lane to Margaret Street. ▪ Removal of all awnings from William Lane. ▪ Relocation of bicycle storage and revised internal program to enhance laneway activation Feedback from the SDRP included: ▪ Greater focus on Margaret Street required. ▪ Reduced focus on William Lane as a place for gathering. ▪ Improved amenity outcomes for dwellings and the public domain. ▪ Redistribution (including potential reduction) of tower and podium bulk and GFA.	

Option	Assessment	
Option 3D	Following feedback from GANSW during the SDRP sessions, Antoniades Architects modelled a built form which fully complied with each of the relevant setbacks and separation distances. This option was not formally put to the SDRP for consideration as it was financially unviable and inconsistent with the built form established by the existing and surrounding developments.	
Option 4 – Final Building Design	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 including the following design considerations: ▪ The podium has a nil setback to Regent Street which aligns with the approved 90-102 Regent Street podium and other developments further north and a minimum setback of 4.6m along Margaret Street to achieve an appropriate separation from St Luke's Presbyterian Church. ▪ The tower form has been setback 7.6m from the southern boundary (greater than 4m required) to improve the relationship with St Luke's Presbyterian Church. ▪ The southern tower steps down in height to improve the transition to the south and reduce potential impacts.	

3. PROJECT DESCRIPTION

3.1. PROJECT OVERVIEW

The proposal has been lodged as a State Significant Development (**SSD**) under Section 4.36(2) of the EPA Act and Schedule of the SSP SEPP. The key features of the proposed development are summarised in the table.

Table 14 Numeric Overview of Proposal

Descriptor	**Proposed**
Site Location	104-116 Regent Street, Redfern
Site Area	1,366m²
Land Use	Ground floor retail premises and student accommodation with ancillary facilities and works
Gross Floor Area	9,562m²
Retail Premises	72m^2
Student Accommodation	387 rooms and 411 beds
Height of Building	Part 3 storeys, part 17 storeys and part 18 storeys
Communal Indoor Area	610m²
Communal Outdoor Area	477m²
Landscaped Area	725m²
Deep Soil Landscaping	Nil
Transport and Access	The site is highly accessible to public transport services. Redfern Railway Station is approximately 300 metres walking distance from the site and provides rail service connections to destinations across Sydney. The future Waterloo Metro Station is approximately 400m walking distance from the site. Bus stops in the immediate locality provide connectivity to surrounding suburbs in the east, south and city. Regent Street is a one-way southbound State Road and Gibbons Street is a one-way northbound State Road, parallel to Regent Street. Margaret Street is a two-way local road that connects Regent Street and Gibbons Street.
Parking Spaces	Nil
Bicycle Parking	102 spaces
Construction Staging	The proposed development will be constructed in a single stage. Construction is forecast to start July 2022 and be completed by December 2023 for operational start in January 2024.

Descriptor	Proposed
Construction Hours	In accordance with the DPIE conditions of consent, which will likely be: ▪ Between 7 am and 6 pm, Mondays to Fridays inclusive; and ▪ Between 7.30 am and 3.30 pm, Saturdays. ▪ No work on Sundays or public holidays.
Operational Details	The student accommodation component of the development will operate 24 hours per day, seven days per week. The retail component will operate 7am-10pm, seven days per week.
Number of Employees	220 jobs during construction and 5 jobs during the operational phase.

The site and proposed development are discussed in further detail within the following sections of the report.

3.2. DETAILED DESCRIPTION

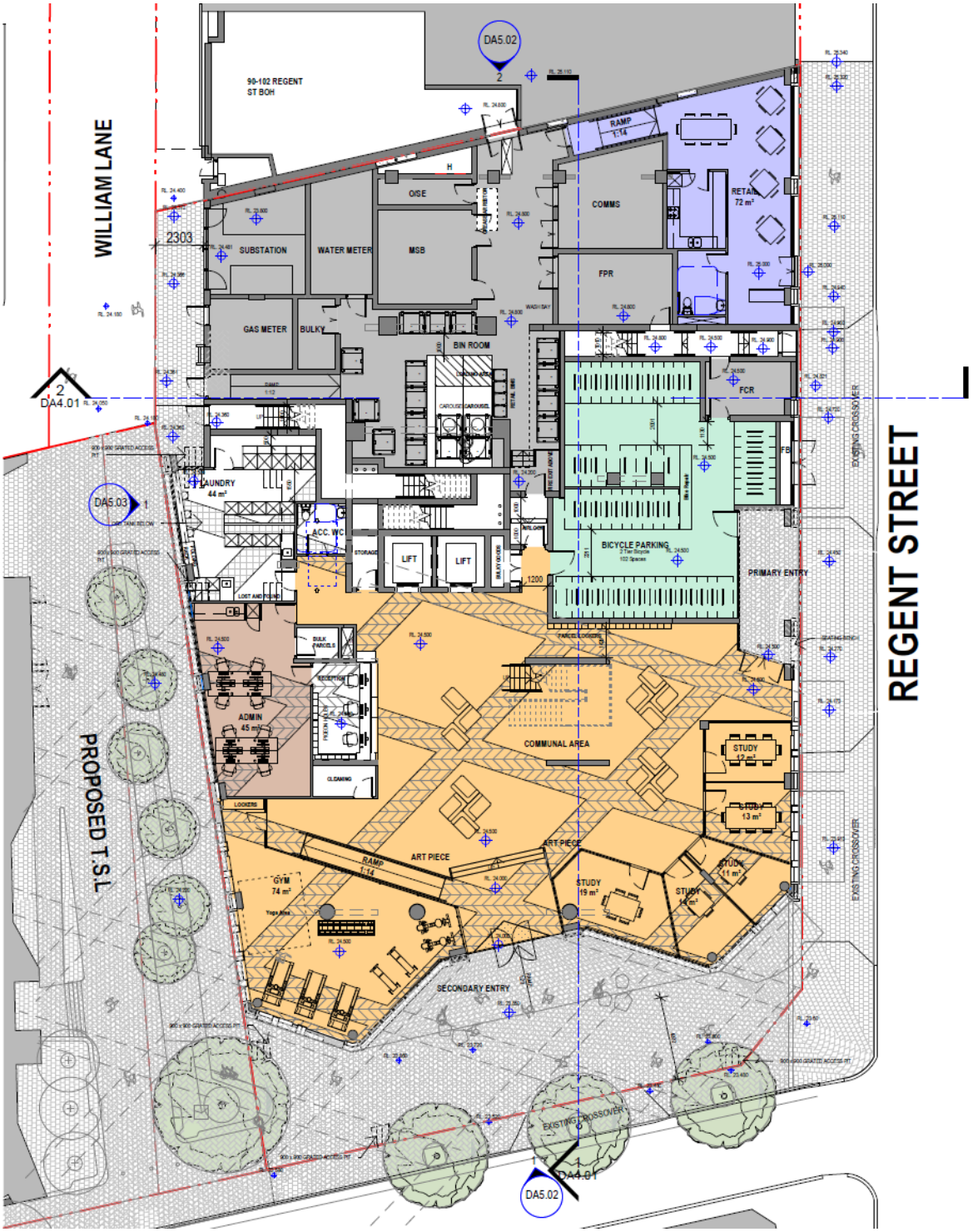
The proposal comprises the redevelopment of the site as summarised below:

- Construction of a part 3 storey, part 17 storey and part 18-storey building comprising a total of 9,562m² gross floor area with a mix of land use activities including:
  - Ground (Level 1): 72m² of retail floorspace, 490m² of communal area for the student accommodation, 102 bicycle parking spaces, waste management facilities and ancillary services and facilities.
  - Upper levels: student accommodation providing a total of 411 beds, including en-suite rooms, studios and two-bedroom configurations, with indoor and outdoor communal spaces on Levels 2, 4 and 16 and additional indoor communal areas on Levels 2 and 4.
- Hard and soft landscaping within the outdoor communal terraces on the roof-top of the podium level and Levels 4 and 16.
- Public domain improvements including provision of a landscaped through-site link connecting William Lane to Margaret Street and associated improvements to the Regent Street and Margaret Street frontages, including awnings and footpath upgrades. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application.

The proposed student accommodation will operate 24 hours per day, seven days per week. The retail component will operate 7am-10pm, seven days per week.

The development will generate 220 jobs during construction and five jobs during the operational phase. The proposed ground floor plan is extracted in the figure plan. The proposal is described in further detail within the following sections of this report.

Figure 9 Ground Floor Plan



Source: Antoniades Architects

3.2.1. Project Area

The site has an area of 1,366m² and the entire site will be developed. The site area is shown on the plan below.

Figure 10 Project Area

Source: Urbis

3.2.2. Physical Layout and Design

A part 3 storey, part 17 storey and part 18 storey building is proposed to be constructed which comprises ground floor retail and purpose-built student accommodation comprising a total of 411 beds and 387 rooms with indoor and outdoor communal spaces, bicycle parking and ancillary facilities.

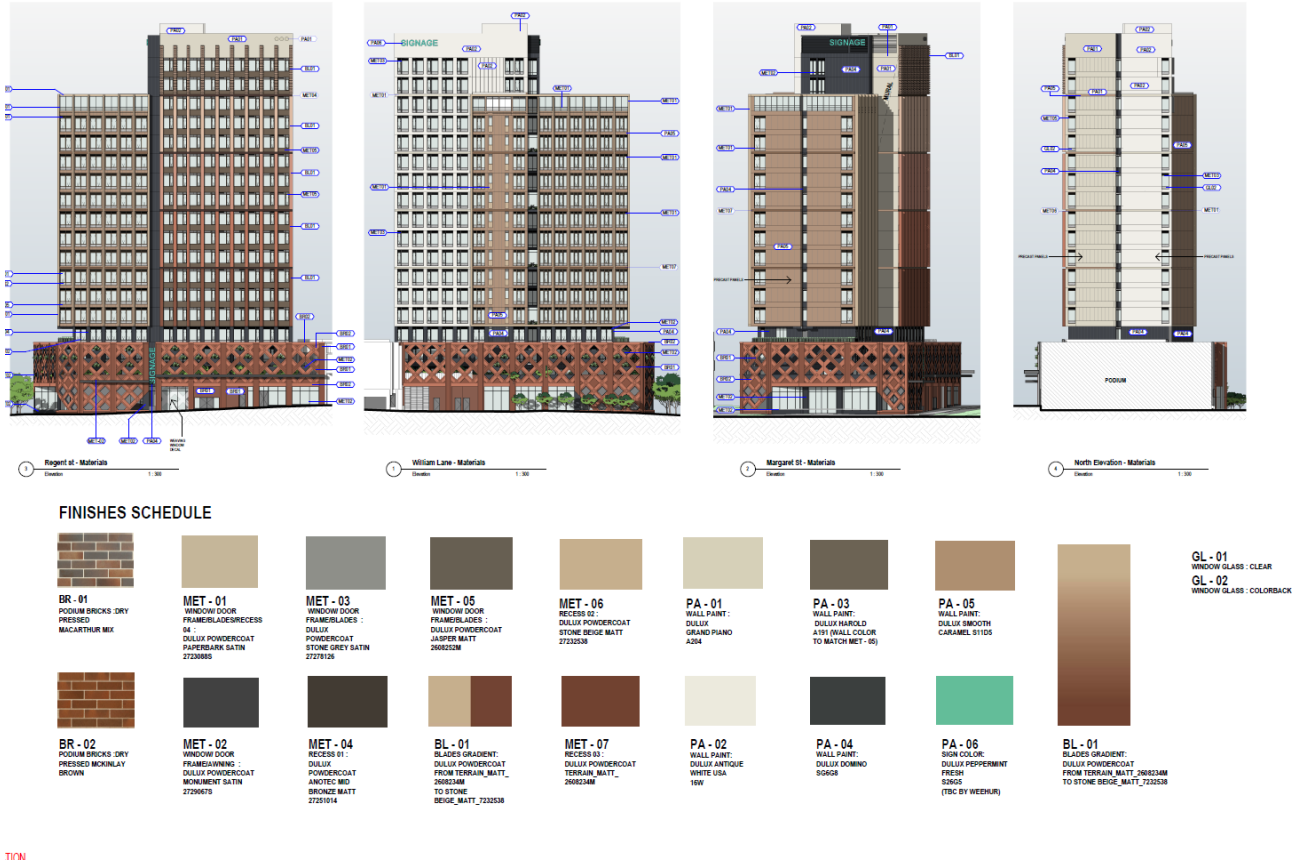
The proposal incorporates high quality materials and finishes, as detailed in the schedule prepared by Antoniades Architects in the Design Report at **Appendix H**. Key features of the proposed materials and finishes are summarised below:

- **Podium Façade Materiality:** Redfern has a strong tradition of brick residential, retail and industrial buildings. Buildings are typically built to the street alignment, or with a small set back in the case of residential terrace houses. The form and materiality of the podium will complement this character, using the depth of the facade to provide a degree of protection and privacy to the openings facing Regent Street.

  The proposed weaving pattern in the design was incorporated based on input from a Gadigal Elder to represent the weaving of natural materials by the Gadigal people. This weaving pattern is demonstrated across the podium. The podium will also provide an awning over the footpath, in keeping with the Redfern character and providing pedestrian amenity and protection.

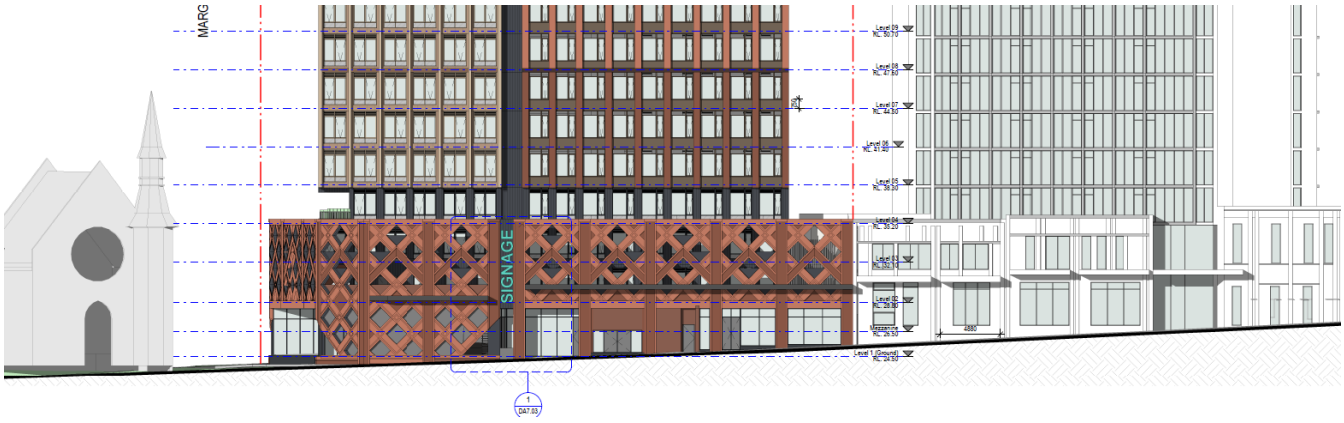
- **Tower Façade Materiality:** the tower facade will be a modern design with contemporary fenestration patterns. Large windows will be provided for the bedrooms, with well-considered sun shading providing protection to the glazing and a finer layer of detail to the facade. The building form will be clad in a combination of glazing, metal panels and precast concrete, which will provide a well finished, high quality, durable finish to the building.

Figure 11 Building Finishes Plan



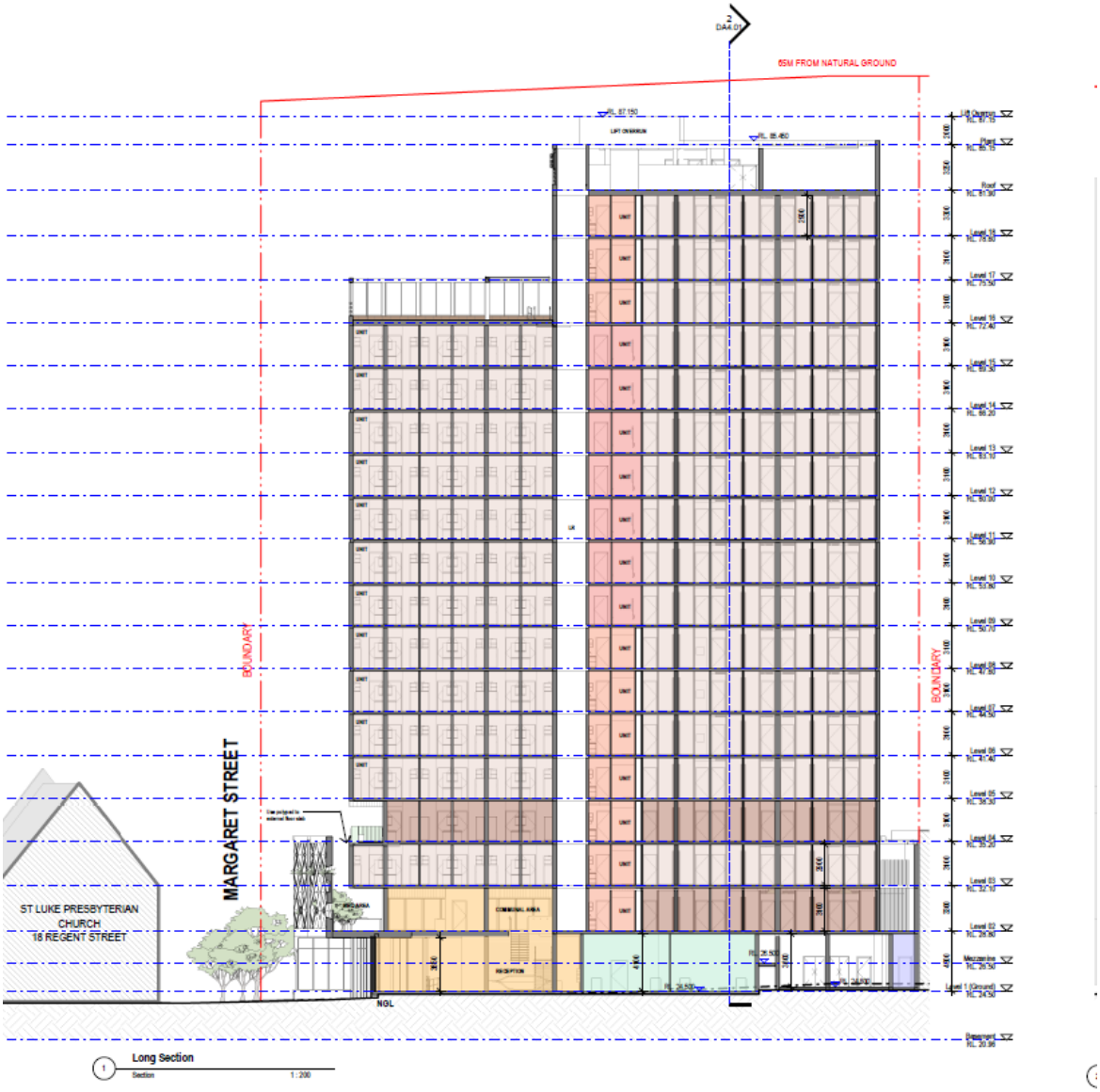
Source: Antoniades Architects

Figure 12 Regent Street frontage



Source: Antoniades Architects

Figure 13 Cross Section



Source: Antoniades Architects

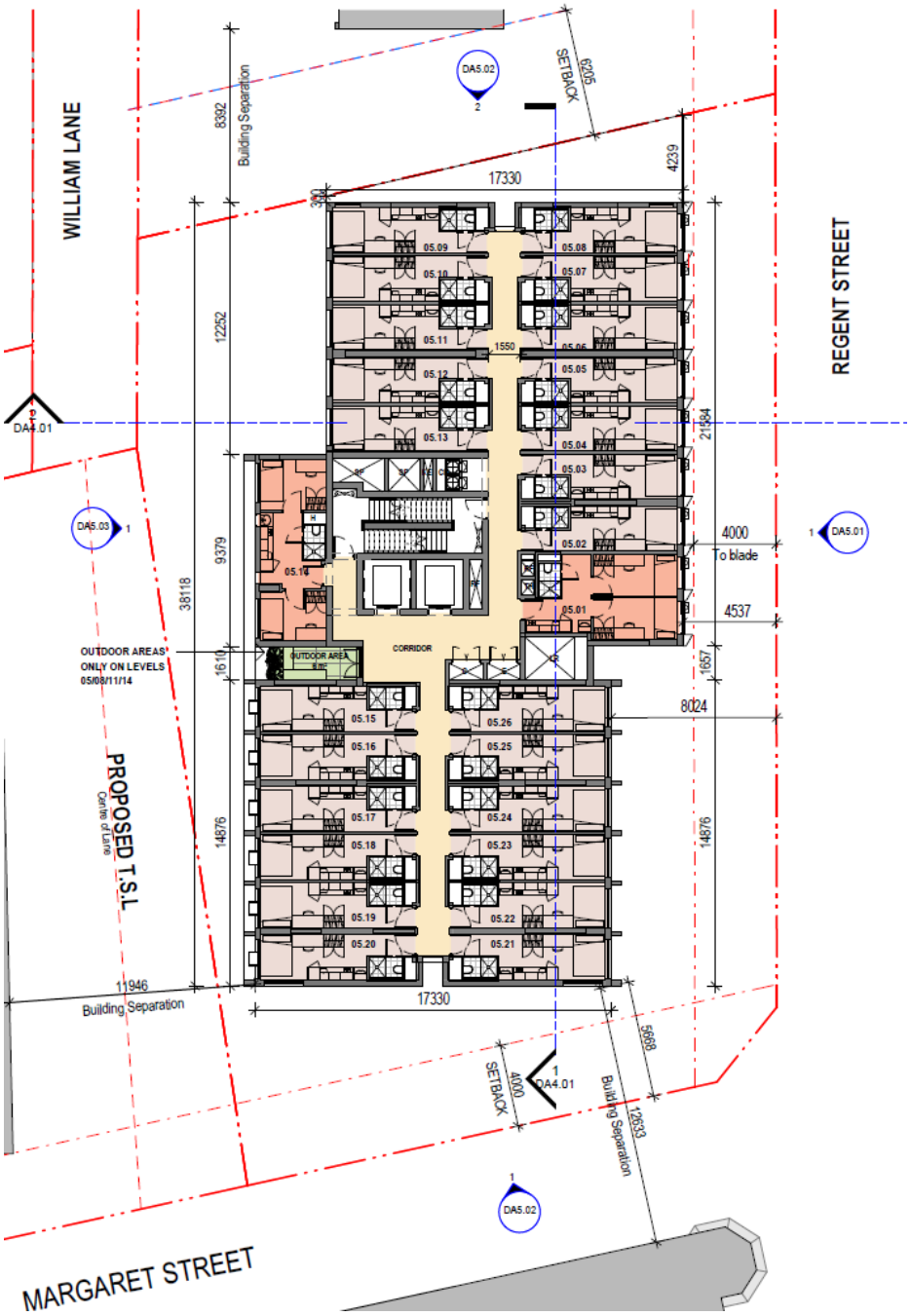
Site Layout

Architectural Plans are attached at **Appendix G** and the Design Report is attached at **Appendix H**. Plan extracts are provided below which show the ground floor and typical tower floor. The table below identifies the proposed floor by floor breakdown of uses.

Table 15 Floor by Floor Breakdown of Building Use

Floor	Uses
Ground Floor	Lobby and reception area; retail premises; communal areas; bicycle parking; gym; study areas; building services and waste rooms.
Level 2	7 x Studio A rooms; 5 x en-suite rooms; 1 x 2 bedroom; communal kitchen and area including cinema 180m²; Level 2 open space 424m².
Level 3	24 x Studio A rooms; 2 x 2 bedroom.
Level 4	20 x en-suite rooms; 30m² of communal area and 37m² of outdoor area.
Level 5- 8	24 x Studio A rooms; 2 x 2 bedroom.
Level 9- 15	24 x Studio A rooms; 1 x 2 bedroom; 1 x accessible room.
Level 16	12 x Studio A rooms; 2 x 2 bedroom; sky garden landscaped open area (240m²).
Level 17/18	12 x Studio A rooms; 1 x 2 bedroom.
Roof	Fire tanks; hot water plants; condenser units and lift overrun; solar panels on the roof.

Figure 14 Level 5- 8 Plan



Source: Antoniades Architects

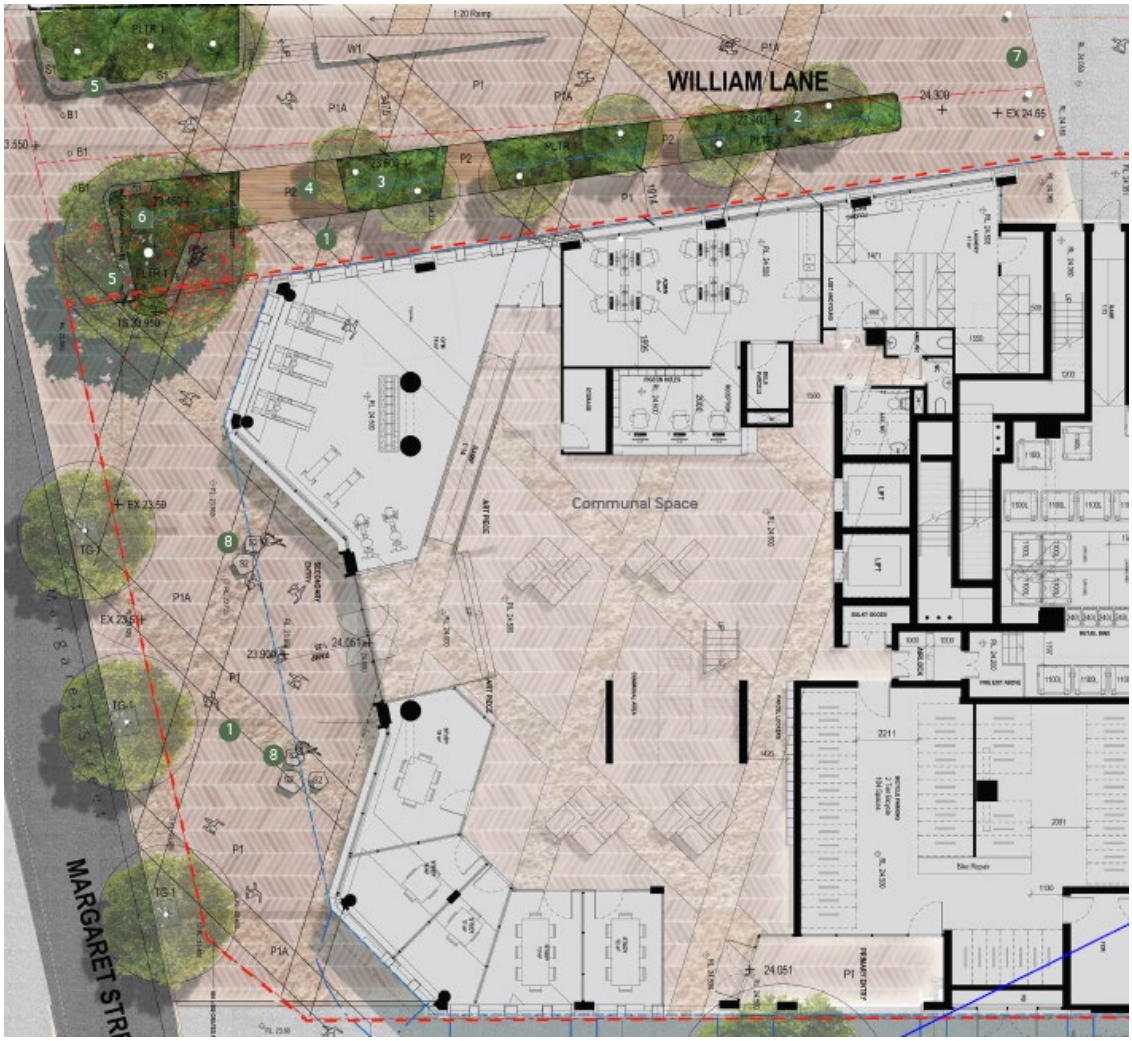
Landscaping

A Landscape Plan has been prepared by RPS Landscape (**Appendix X**) which incorporates the landscape treatment of the podium roof-top and public domain improvements along the Regent Street, Margaret Street and William Street frontages.

The Landscape Plans include extensive public domain works along William Lane, including timber bridges for meeting and gathering, a focal meeting tree towards Margaret Steet. A rain garden with educational elements and an interpretative art and fishing tools. It is noted the landscaped through-site link connecting William Lane to Margaret Street forms part of 13-23 Gibbons Street which will be addressed via a separate application. The ground floor landscaping treatment is outlined on the figure below.

The proposed landscaping and planting plan includes a range of native vegetation communities and plant species. The species were selected in consultation with Indigigrow and Gadigal Elder Uncle Chicka's granddaughter, Lilly Madden (Indigenous landscape designers). This has ensured the vegetation at the site was chosen for its suitability and cultural significance.

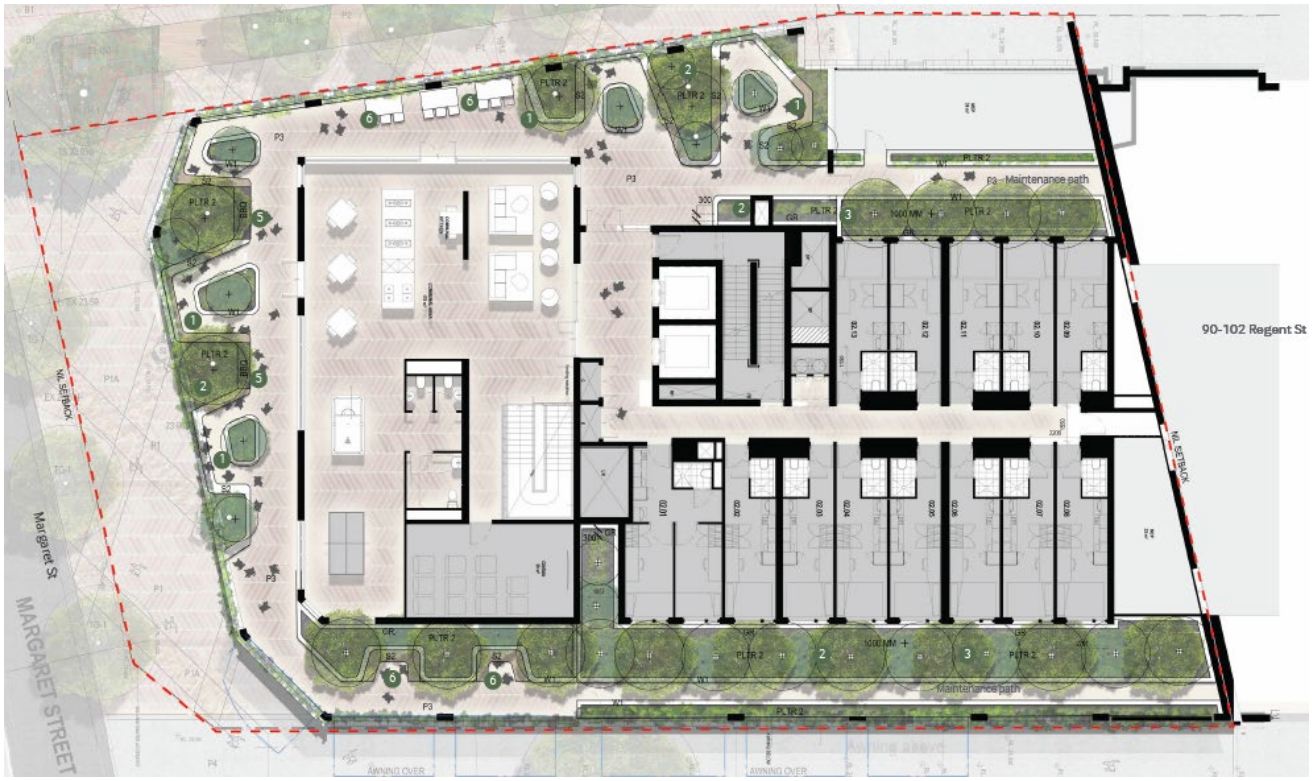
Figure 15 Ground Floor Landscape Plan



Source: RPS Landscape

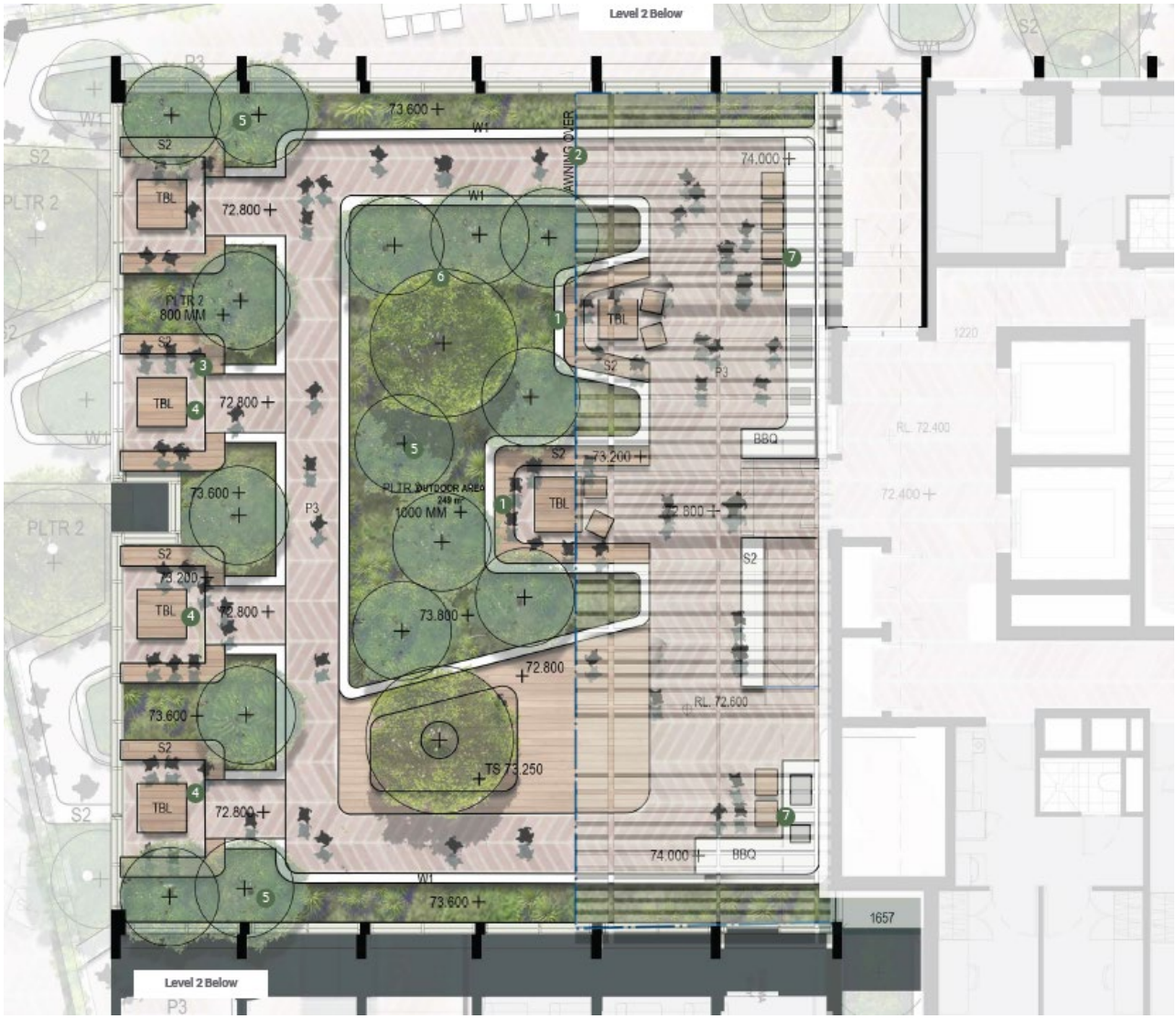
The outdoor communal areas on Level 2 and the Level 16 sky park will be landscaped to provide for an attractive green streetscape, visual privacy between the site and the surrounding developments and a high-level of amenity for the future building occupants. The proposed landscaping includes BBQ facilities and alfresco dining area, adaptable open space and raised planter boxes.

Figure 16 Level 2 Recreational Deck



Source: RPS Landscape

Figure 17 Level 16 Sky Park



Source: RPS Landscape

3.2.3. Uses and Activities

The SSDA seeks consent for ground floor retail premises and student housing accommodation with indoor and outdoor communal spaces, on-site bicycle parking and ancillary facilities. The proposed activities are summarised below.

Operational Details

Development approval is sought for the operation of the retail premises between 7am and 10pm. The student housing component will operate 24 hours per day, seven days per week, with additional restrictions on the outdoor communal spaces in accordance with the Operational Management Plan. The proposed development will generate 220 jobs during construction and five jobs during the operational phase.

An Operational Management Plan (**OMP**) prepared by Wee Hur is provided at **Appendix Y**. The Level 16 outdoor terraces will be limited to resident use between 8am to 10pm every day. Access to the building will be via the ground floor foyer entries on Regent Street and Margaret Street, with electronic door locking systems which require key cards to enter.

An Operational Waste Management Plan (**OWMP**) has been prepared by Waste Audit (**Appendix L**). A garbage room with areas for residential and retail waste and recycling will be located on the ground floor in proximity to the loading dock. All loading and waste collection activities will be undertaken on the adjacent student accommodation on 90-102 Regent Street within the proposed loading area. The loading area will be accessed via William Lane.

Transport and Parking

Pedestrian access to the site will be via the two entrances located on Regent Street and Margaret Street. Access will be controlled by electronic door locking systems which require key cards to enter.

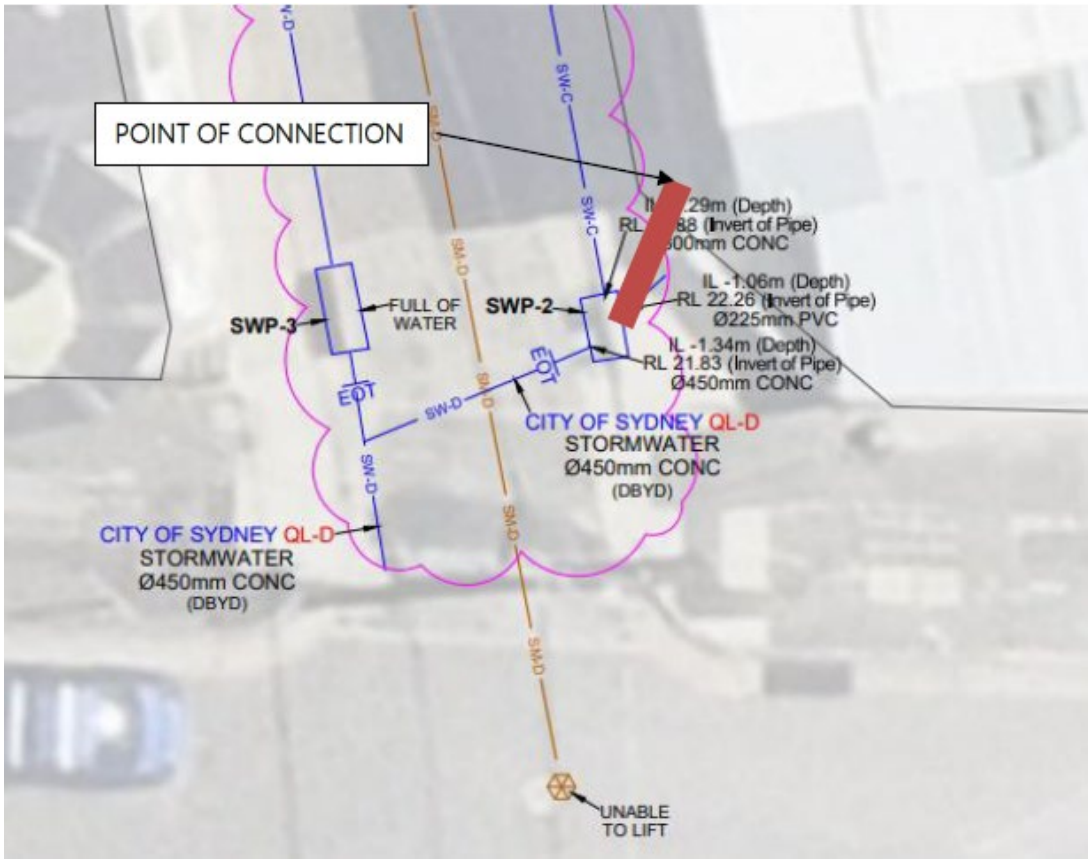
On-site parking for 102 bicycles is provided on the ground floor with access via Regent Street. No car parking will be provided on the site to avoid additional traffic impacts and consistent with recent approvals for similar developments.

Stormwater Management

The proposed point of connection for the site stormwater drainage is the existing kerb inlet pit on the North side Margaret Street, at the corner of Margaret Street and Regent Street. The kerb inlet pit lintel level as per the survey is RL 23.360. The base of the pit as per the below ground survey as shown in the figure below was determined to be RL 21.830 at the invert level of the downstream pipe.

The downstream pipe was determined to be 450mm diameter concrete pipe, running below Margaret Street and connecting directly to a 450mm diameter concrete pipe serving the south side of Margaret Street.

Figure 18 Point of Connection Plan



Source: JHA Consulting

Signage

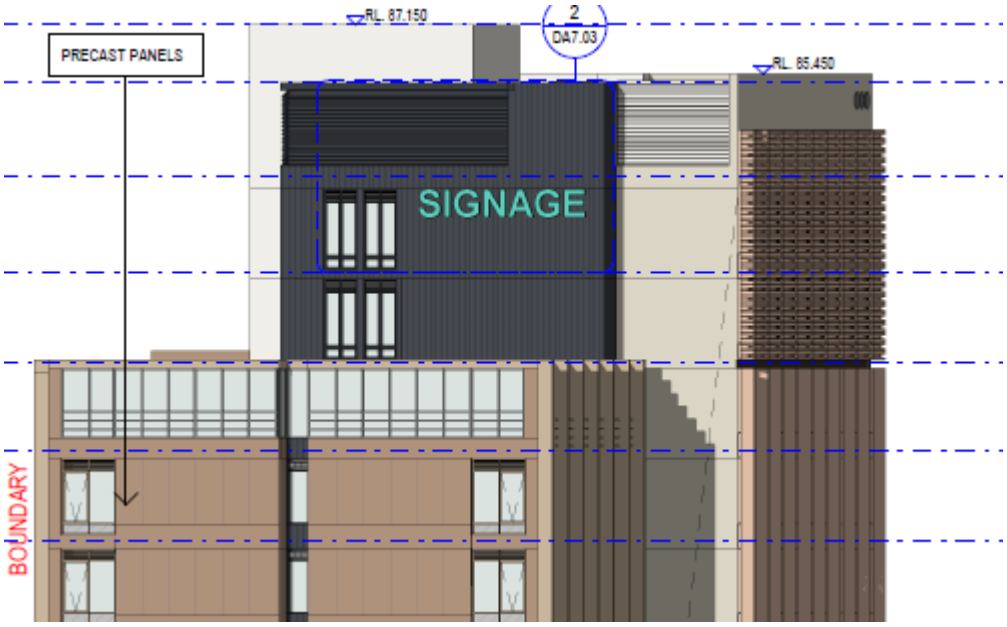
Three indicative signage zones are proposed to identify the building. These include a fascia sign on the awning above the building entry and two top-of-building signs:

- Southern elevation (Margaret Street);
- Western elevation (William Lane).

Figure 19 Regent Street ground floor entry signage

Source: Antoniades Architects

Figure 20 Margaret Street Elevation



Source: Antoniades Architects

3.2.4. Development Timing

The proposed development will be constructed in a single stage. Construction is forecast to start July 2022 and be completed by December 2023 for operational start in January 2024. The construction phases are outlined in detail in the Construction Management Plan prepared by Richard Crooks Construction (**Appendix AA**).

4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Environmental Planning and Assessment Act 1979*
- *NSW Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (State Significant Precincts) 2005*
- *State Environmental Planning Policy (Urban Renewal) 2010*
- *State Environmental Planning Policy (Housing) 2021*
- *State Environmental Planning Policy (Infrastructure 2007)*
- *State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)*
- *State Environmental Planning Policy No 64 – Advertising and Signage*
- *State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *Sydney Local Environmental Plan 2012*
- *Sydney Development Control Plan 2012*
- *Redfern-Waterloo Development Contributions Plan 2006*
- *Redfern-Waterloo Affordable Housing Contributions Plan 2006.*

This section identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1. STATUTORY REQUIREMENTS

Table 16 categorises and summarises the relevant requirements in accordance with the DPIE *State Significant Development Guidelines*.

Table 16 Identification of Statutory Requirements for the Project

Statutory Relevance	**Action**
Power to grant approval	The EPA Act establishes the framework for the assessment and approval of development and activities in NSW. The EPA Act also facilitates the making of environmental planning instruments which guide the way in which development should occur across the State, this is inclusive of State environmental planning policies and local environmental plans. Section 4.36 of the EPA Act provides for a process where development can be declared SSD either by a SEPP or Ministerial order published in the Government Gazette. Section 4.37 of the EPA Act provides that the Minister is the consent authority for SSD. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. The proposal is subject to section 4.38 for State Significant Development.

Statutory Relevance	Action
Permissibility	*State Environmental Planning Policy (State Significant Precincts) 2005* is the primary environmental planning instrument governing development on the site. The site is zoned Zone E - Business - Commercial Core under *State Environmental Planning Policy (State Significant Precincts) 2005.*  The land use objectives in the Business – Commercial Core are: *(a) to facilitate the development of a town centre,* *(b) to encourage employment generating activities by providing a wide range of retail, business, office, community and entertainment facilities,* *(c) to permit residential development that is compatible with non-residential development,* *(d) to maximise public transport patronage and encourage walking and cycling,* *(e) to ensure the vitality and safety of the community and public domain,* *(f) to ensure buildings achieve design excellence,* *(g) to promote landscaped areas with strong visual and aesthetic values to enhance the amenity of the area.* The proposal will facilitate the ongoing development of the town centre by providing a high-quality mixed-use building that is compatible and consistent with existing, approved and likely future developments and provides active frontages and public domain improvements that will contribute to the revitalisation and vibrancy of the locality.

Statutory Relevance	Action
	The proposed 'retail premises' (shop) and 'co-living' (student accommodation) are not prohibited within the zone and are consistent with the objectives of the zone. Accordingly, the proposal is permitted with consent.
Other approvals	Consent under section 138 of the Roads Act 1993 is required for any works within the public road reserve. There are no other known additional approvals that are required to carry out the project or that would be required if the project was not classified as SSD.
Pre-condition to exercising the power to grant approval	An assessment of the mandatory pre-conditions that must be satisfied before the Minister may grant approval to the project is provided in **Section 4.3** below and summarised in the Statutory Compliance Table at **Appendix C**. This includes a review of the previous remediation investigations which have been completed in accordance with SEPP 55 to confirm the site is suitable for its intended use.
Mandatory matters for consideration	An identification of the matters for consideration is outlined in the Statutory Compliance Table at **Appendix C**. The proposal demonstrates a high level of compliance with the applicable statutory requirements, including: ▪ *Environmental Planning and Assessment Act 1979* ▪ *NSW Biodiversity Conservation Act 2016* ▪ *State Environmental Planning Policy (State and Regional Development) 2011* ▪ *State Environmental Planning Policy (State Significant Precincts) 2005* ▪ *State Environmental Planning Policy (Urban Renewal) 2010* ▪ *State Environmental Planning Policy (Housing) 2021* ▪ *State Environmental Planning Policy (Infrastructure 2007)* ▪ *State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)* ▪ *State Environmental Planning Policy No 64 – Advertising and Signage* ▪ *State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development* ▪ *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017* ▪ *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004* ▪ *Sydney Local Environmental Plan 2012* ▪ *Sydney Development Control Plan 2012* ▪ *Redfern-Waterloo Development Contributions Plan 2006* ▪ *Redfern-Waterloo Affordable Housing Contributions Plan 2006.*

4.2. PRE-CONDITIONS

Table 17 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS.

Table 17 Pre-conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
Environment Protection and Biodiversity Conservation Act 1999	Chapter 2 of the EPBC Act establishes controls for assessing and regulating the environmental impact of activities (including development) where a Matters of National Environmental Significance (MNES) may be affected. Under the EPBC Act, any action which has, will have, or is likely to have a significant impact on MNES is defined as a "controlled action" and requires approval from the relevant Commonwealth Minister.	A request seeking a waiver for the requirement for a Biodiversity Development Assessment Report (BDAR) was prepared by Greentape Solutions and submitted to DPIE on 28 March 2021 (refer to **Appendix U**). A desk-top assessment prepared by Greentape Solutions confirmed the site contains no threatened species habitat or vegetation and the proposal will not require any clearing of native vegetation. The only Environment Protection and Biodiversity Conservation Act 1999 listed species and Matter of National Environmental Significance recorded occurring at and near the site is the Grey-headed flying-fox. This species is nomadic an itinerant and likely feeding on local vegetation within the inner-city green zones. There are no habitat features within the development site suitable for this species. A survey was also undertaken of the site on 23 March 2021 which confirmed there was no evidence of microbats within the buildings. A BDAR waiver was issued by the NSW DPIE on 22 June 2021 and a BDAR is not required to be prepared and submitted as part of this SSD application (refer to **Appendix U**).	**Section 6.2.4**
State Environmental Planning Policy No 55 - Remediation of Land (SEPP 55) - clause 7(1)	A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is	Several environmental investigations have been carried out on the site dating from 1999 to 2021. These investigations have confirmed that a limited extent of soils aesthetically impacted with petroleum hydrocarbons will be present in proximity of the site UPSS.	**Section 6.1.10**

Statutory Reference	Pre-condition	Relevance	Section in EIS
	proposed to be carried out.	A Remediation Action Plan (**RAP**) relating to the site, an Addendum RAP and a letter of interim advice from an accredited site auditor was submitted with a local DA for the decommissioning of the petrol tanks (D/2020/1095). A Site Audit Statement is attached at **Appendix BB** which confirms that the remediation and validation works have been completed in accordance with the Remedial Action Pan as prepared for the site.	

4.3. MANDATORY CONSIDERATIONS

Table 18 outlines the relevant pre-conditions to exercising the power to grant approval and the section where these matters are addressed within the EIS

Table 18 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	**Appendix C**
Section 4.15	Relevant environmental planning instruments: *State Environmental Planning Policy (State and Regional Development) 2011*	**Appendix C**
	State Environmental Planning Policy (State Significant Precincts) 2005	**Appendix C**
	State Environmental Planning Policy (Urban Renewal) 2010	**Appendix C**
	State Environmental Planning Policy (Affordable Rental Housing) 2009	**Appendix C**
	State Environmental Planning Policy (Infrastructure 2007	**Appendix C**
	State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)	**Appendix C**
	State Environmental Planning Policy No 64 – Advertising and Signage	**Appendix C**

Statutory Reference	Mandatory Consideration	Section in EIS
	State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development	**Appendix C**
	State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017	**Appendix C**
	State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	**Appendix C**
	Redfern-Waterloo Development Contributions Plan 2006	**Appendix C**
	Redfern-Waterloo Affordable Housing Contributions Plan 2006	**Appendix C**
	Housing State Environmental Planning Policy	**Appendix C**
	Relevant planning agreement or draft planning agreement No planning agreements relevant to the proposed development	**N/A**
	Development control plans Sydney Development Control Plan 2012	**Appendix C**
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	**Section 6**
	The suitability of the site for the development	**Section 7.4.7**
	The public interest	**Section 7.4.9**
Mandatory relevant considerations under EPIs		
SEPP 55 - clause 7	A preliminary investigation of the site is to be carried out in accordance with the contaminated land planning guidelines.	**Section 6.1.10** and **Appendix BB**
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act) – section 7.14	The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values.	**Section 6.2.4**

Statutory Reference	Mandatory Consideration	Section in EIS
Development Control Plans		
Sydney DCP 2012	The site is not classified as land to which the Sydney DCP 2012 applies as it is contained within the Redfern–Waterloo Authority State Significant Precinct. Further, the provisions of a DCP do not apply to SSD in accordance with Clause 11 of the SRD SEPP. However, the following matters are noted in relation to the LEP on a merit-basis: ▪ Public domain ▪ Design excellence ▪ Ecologically sustainable development ▪ Water and flood management ▪ Heritage ▪ Traffic and Parking ▪ Accessible design ▪ Waste ▪ Late-night trading management	**Appendix C**

5. COMMUNITY AND STAKEHOLDER ENGAGEMENT

Community and stakeholder engagement was undertaken by Elton Consulting and the project team in the preparation of the SSDA, including direct engagement and consultation with:

- City of Sydney Council
- NSW Government Architect's Office
- Sydney Coordination Office within Transport for NSW
- Roads and Maritime Services
- Environment, Energy and Science Group of the Department of Planning, Industry and Environment (former Office of Environment and Heritage)
- Heritage Division of the Department of Premier and Cabinet (former Heritage Division of the Office of Environment and Heritage)
- Sydney Water
- Sydney Trains
- Sydney Metro
- Sydney Airport
- Adjoining sites and landowners.

The community and stakeholder engagement undertaken has sought to address the requirements of the SEARs and includes:

- Description of the consultation process
- Discussion of the issues raised during consultation
- How the proposal has been amended to address these issues.

Details of the outcomes of the community and stakeholder engagement is contained in the Engagement Summary Table (**Appendix D**) and Community and Stakeholder Engagement Report (**Appendix CC**). A summary of the responses to issues raised by stakeholders during the engagement process are summarised in the tables below.

Ongoing engagement with Gadigal Elders was also undertaken as part of a co-design process in association with the Connecting with Country framework. This has been addressed separately within this report (refer **Section 6.1** and **Appendix GG**).

5.1. GOVERNMENT AGENCIES AND OTHER STAKEHOLDERS

The applicant and their consultants have engaged in one-on-one briefings with the relevant Government agencies throughout the Detailed SSD DA process as outlined in the table below.

Table 19 Community and Stakeholder Engagement: Issues and Responses

Feedback	Response
City of Sydney Council **Briefing meeting with Council officers on 19 August 2021:** ▪ Andrew Rees – Area Planning Manager ▪ Marie Burge – Specialist Planner, Major Projects ▪ Lin Yang – Senior Public Domain Coordinator	

Feedback	Response
▪ Raj Narayan – Senior Public Domain Coordinator ▪ Karen Dunne – Specialist Environmental Health Officer ▪ Emma Washington – Landscape Architect ▪ Erin Colgrave – Urban Designer ▪ Tom Britton – Tree Management Officer ▪ David Eckstein – Environment Advisor ▪ Christian Thomsen – Planning Assessment Officer ▪ Jane Grant – Team Leader Public Domain/ Design Manager The key issues raised by City of Sydney and the Project team responses are provided below.	
Arborist report required to confirm retention of trees based on first order branches and awning height	An Arboricultural Impact Assessment has been prepared by Urban Arbor and is provided at **Appendix DD**. The AIA assesses the existing street tree on the Regent Street and recommends removal. The proposed public domain works include extensive tree planting as detailed in the Landscape Plans (**Appendix X**).
Tree species to be confirmed for public domain – palms not acceptable	The proposed landscaping and planting plan includes a range of native vegetation communities and plant species. The species were selected in consultation with Indigigrow and Uncle Chicka's granddaughter Lilly Madden (Indigenous landscape designers). This has ensured the vegetation at the site was chosen for its suitability and cultural significance.
Retention or dedication of land – retain with easement and maintenance schedule	The lane way will be owned by Wee Hur with City of Sydney Council granted an easement over the land for public use. Maintenance of the landscaping will be managed by Wee Hur.
Proposed easement for Gibbons Street to be updated to include this site.	The lane way will be owned by Wee Hur with City of Sydney Council granted an easement over the land for public use. Maintenance of the landscaping will be managed by Wee Hur.
Query splay along William Lane – strong corner and transition to church building, open up public domain and transparent base to both sides of building	The podium component, including its relationship with Margaret Street and William Lane, was subject to further detailed revisions following the meeting with Council and in response to the detailed design feedback provided by the SDRP. This included relocation of the building entry and bicycle storage to further activate the William Lane frontage and an increased setback to Margaret Street to improve the

Feedback	Response
	relationship with and transition to the heritage listed church building. A setback of 4.6m is provided along Margaret Street to deliver public domain improvements and provide appropriate separation from St Luke's Presbyterian Church. This was a key factor in achieving design excellence, incorporating the input from the SDRP which sought to improve the pedestrian amenity and connections from Regent Street to William Lane and beyond to Redfern railway station. The proposed weaving pattern in the design was incorporated based on input from a Gadigal Elder to represent the weaving of natural materials by the Gadigal people. This weaving pattern is demonstrated across the podium. The podium will also provide an awning over the footpath, in keeping with the Redfern character and providing pedestrian amenity and protection.
Façade greening to be designed carefully with maintenance and architecturals including access, aspect, micro-climate, etc for longevity – soil depths, maintenance, drainage.	Landscape Plans have been prepared by RPS Landscape which detail the façade greening details (**Appendix X**).
Retail could be better located in William Lane, potential noise and amenity.	The proposed retail space will activate the Regent Street frontage. It is considered the proposed future business will benefit from increased pedestrian traffic along Regent Street.
Flooding issues within locality	WMA Water have prepared a Flood Assessment Report (**Appendix EE)** which considers the flood risk and sets out the stormwater management works associated with the proposed development. The report concludes the site is in a flood safe area and is suitable for the proposed development subject to the adoption and implementation of the listed mitigation measures. Refer to **Section 6.1.13** for further discussion.
Awning design and potential conflict with street tree, no requirement for continuous awning.	The awning design is consistent with the awning for the approved building on the immediately adjoining property to the north (90-102 Regent Street).
Pavement design will need to be updated to reflect City of Sydney Public Domain Manual – query whether a different approach could be pursued to make this a 'special place'.	The pavement design is in accordance with the City of Sydney Public Domain Manual.

Feedback	Response
Concern regarding building separation between towers and urban design principles – many different factors have informed the building separation distances including setbacks, privacy, solar, wind, etc with testing of multiple (8-10+) options	The architectural drawings prepared by Antoniades Architects (**Appendix G**) demonstrate the way in which the building has been sited and designed to provide appropriate separation between the tower and the existing and approved buildings to the north and west the site, considering potential visual and privacy impacts and optimising the distance between the tower and the buildings to the south. It is noted the final design was largely influenced by the SDRP, which recommended increasing the setbacks along Margaret Street and to the nearby church building to improve the relationship to St Luke's Presbyterian Church. Where separation distances are less than the recommended distances within the UDP, privacy mitigation measures are included to avoid adverse impacts on visual privacy. Antoniades Architects have designed hoods to the windows facing William Lane and 90-102 Regent Street to maximise visual privacy.
NCC 2022 consider potential implications regarding energy efficiency on final design	Vipac Engineers have prepared a suite of documents to assess the sustainability and efficiency of the proposed development (**Appendix I**; **Appendix J**; **Appendix K**).
Government Architect of NSW Four State Design Review Panel (SDRP) meetings were held on 3 March 2021, 9 June 2021, 21 July 2021 and 15 September 2021 with the following attendees: ▪ Rory Toomey, Chair – GANSW ▪ Libby Gallagher, Panellist ▪ Daniele Hromek, Panellist ▪ Richard Johnson, Panellist ▪ Andrew Nimmo, Panellist ▪ Angus Bell, GANSW Design Advisor ▪ Minoshi Weerasinghe, DPIE ▪ Cameron Sargent, DPIE ▪ Peter John Cantrill, City of Sydney	The Design Report prepared by Antoniades Architects (**Appendix H**) details the issues raised by the GANSW and SDRP during the briefing meeting and design briefings and the way in which they have been responded to within the final proposal. The key issues from the final design briefing as identified in the correspondence issued by the GANSW dated 9 September 2020 are responded to in **Section 6.1** of the EIS.

Feedback	Response
Heritage NSW and Heritage Council Artefact notified the following groups of the project proposal on 7 January 2021 with the following outcomes: ▪ A response was received from Heritage NSW with a list of stakeholders who may have an interest in the proposed development. ▪ The Metro LALC did not respond ▪ The City of Sydney Council did not respond ▪ The National Native Tittle Tribunal replied that they had no list of stakeholders who may have an interest in the proposed development.	A Heritage Impact Statement (**Appendix W**) has been prepared by Weir Phillips Heritage and an Aboriginal Cultural Heritage Assessment Report has been prepared by Artefact Heritage **(Appendix V**). Both reports have been prepared in accordance with the relevant guidelines. It is expected that the SSDA package will be referred to the Heritage Council and Heritage NSW during the exhibition period for formal comment.
Sydney Water Arcadis undertook a review of DBYD information received from Sydney Water during the preparation of the Infrastructure Report (**Appendix S**) which confirmed the Sydney Water network within the vicinity of the site.	The existing 150DICL water main running along Regent Street has insufficient pressure to service the development. A Water Services Co-ordinator will be engaged to design and project manage the works including a section 73 application to Sydney Water, following lodgement of the SSDA documentation. The sanitary drainage is to be connected into relocated sewer main running through William Lane. Provision has been made to accommodate this in the design of the sewer relocation.
Sydney Metro On 2 November 2021, Sydney Metro was provided with a preliminary plan of the building foundation layout and loads by email. Sydney Metro issued emailed correspondence dated 10 November 2021 which confirmed the plan had been reviewed and no significant issues were identified. The Sydney Metro response also stated that the final design, impact statement and assessment of potential impacts on Sydney Metro assets will need to be submitted once completed.	The final design and associated documents will be provided to Sydney Metro as the proposal is refined during the SSDA assessment and detailed design phases.
Sydney Airport An application to Sydney Airport Corporation Limited was made on 4 August 2021 for the intrusion of the proposed tower into airspace which is prescribed airspace for Sydney Airport.	The Proponent accepts the Sydney Airport Corporation Limited conditions.

Feedback	Response
Assessment The Conical Surface of the OLS above this site is at a height of 83 metres above the Australian Height Datum (AHD) and hence prescribed airspace above the site commences at 83 metres AHD. At a maximum height of 87.15 metres AHD, the building will penetrate the OLS by 4.15 metres. Sydney Airport Corporation Limited approved the controlled activity for the instruction of the proposed building subject to the following conditions. **Conditions** The building must not exceed a maximum height of 87.15 metres AHD, including all lift over-runs, vents, chimneys, aerials, antennas, lightning rods, any roof top garden plantings, exhaust flues etc. Separate approval must be sought under the Regulations for any equipment (i.e. cranes) required to construct the building. Approval to operate construction equipment (i.e. cranes) be obtained prior to any commitment to construct. The Proponent must advise Airservices Australia at least three business days prior to the controlled activity commencing. On completion of construction of the building, the Proponent must provide the Sydney Airport Corporation Limited airfield design manager with a written report from a certified surveyor on the finished height of the building.	
DPIE Key Sites A request seeking a waiver for the requirement for a Biodiversity Development Assessment Report (BDAR) was prepared by Greentape Solutions and submitted to DPIE on 28 March 2021 (refer to Appendix U). A desk-top assessment prepared by Greentape Solutions confirmed the site contains no threatened species habitat or vegetation and the proposal will not require any clearing of native vegetation. The only Environment Protection and Biodiversity Conservation Act 1999 (EPBC) listed species and Matter of National Environmental	A BDAR waiver was issued by the NSW DPIE on 22 June 2021 and a BDAR is not required to be prepared and submitted as part of this SSD application (refer to **Appendix U**).

Feedback	Response
Significance (MNES) recorded occurring at and near the site is the Grey-headed flying-fox. This species is nomadic an itinerant and likely feeding on local vegetation within the inner-city green zones. There are no habitat features within the development site suitable for this species. A survey was also undertaken of the site on 23 March 2021 which confirmed there was no evidence of microbats within the buildings.	

5.2. COMMUNITY CONSULTATION

Community consultation was undertaken as outlined in detail within the Community Consultation and Engagement Report prepared by Elton Consulting (**Appendix CC**).

Various strategies were implemented to ensure collaborative community involvement in the project. This includes telephone calls, face to face and online meetings (subject to COVID-19 requirements). A summary of the key themes raised by the local community and the associated responses are summarised in the following table.

Table 20 Summary of responses to community consultation matters

Feedback	Proponent Response
Occupancy Rates Impacts of COVID-19 on occupancy of the proposal and whether the proposal would have an alternative/interim use in the event of low take-up rates.	As travel restrictions ease, it is expected many international students will be returning to Australia for their studies. The Australian Government has also endorsed an International Student Arrival Plan for NSW to facilitate the safe arrivals of students back to the state. Under this plan, the Australian Government has established a pilot program to facilitate the arrival of 500 international students to NSW in December 2021, with more student arrivals expected in 2022. There is therefore expected to be a future demand for student accommodation across NSW.
Overshadowing Concern about potential overshadowing impacts on adjacent properties.	The proposed development complies with the maximum building height controls and has been sited to provide for satisfactory separation distances between the northern and western neighbouring towers. The Architectural Plans (**Appendix G**) provide a comprehensive assessment of the potential shadow impacts of the proposed development. The shadow diagrams show that the locality is affected by the existing and approved developments to the north and west of the site, including the approved developments at 80-88 Regent Street, 11 Gibbons Street, 13-23 Gibbons Street and 90-102 Regent Street. The properties further south of Margaret Street will be impacted by additional overshadowing due to the proposed development. However, impacts are limited to the mid-

Feedback	Proponent Response
	morning period, with most impacts along the Regent Street properties absorbed by the impacts of existing developments to the north and west of the site. Similarly, the proposed development will not create additional overshadowing impacts to the existing overshadowing to the properties on the western side of Regent Street, as demonstrated in the overshadowing plans. The proposed built form has been designed to avoid unacceptable shadow impacts to surrounding properties and the public domain. Antoniades Architects have incorporated vertical blades on the Regent Street and William Lane frontages to optimise solar access.
Density Concerns the proposal was not consistent with the existing streetscape.	The locality is undergoing a transition in association with the relevant planning framework. The scale, bulk and size of the proposed development is consistent with recent approvals issued for the adjoining and surrounding properties, including 90-102 Regent Street and 13-23 Gibbons Street.
Transition to St Luke's Church It appears the proposal would be particularly jarring in comparison to the nearest streetscape building the former Church.	The final design satisfactorily responds to the detailed feedback provided by the SDRP, including significant changes to the distribution of GFA in response to contextual and urban considerations, including the former church. Specifically: ▪ Increased setbacks provided along the Margaret Street frontage, including at the ground level (podium) and shifting the tower form towards the northern site boundary (away from St Luke's Church). ▪ Increased setback for the southern tower component along Regent Street (southeast corner) to provide appropriate sightlines to St Luke's Presbyterian Church. The podium level is broken into multiple sections by vertical fin elements, which responds to the fine grain quality of the historic Victorian and Federation era streetscape that formed the original setting of St Luke's Presbyterian Church. The proposed development will not block any historically significant view corridors to or from St Luke's Presbyterian Church, as the presently exposed northern wall along the Margaret Street boundary was originally obscured by neighbouring nineteenth century terraces. Weir Phillips Heritage conclude that the proposed development will have an acceptable impact on the ability to understand the former St Luke's Presbyterian Church as an example of a Victorian Gothic Church which makes an

Feedback	Proponent Response
	important contribution to the streetscape and township of Redfern.
Proposed Accommodation Type Concerns about an over-supply of student accommodation in the area. The proposal does not fit in with longer-term planning, does not improve the community and is not culturally attuned.	An Operational Management Plan (**Appendix Z**) has been prepared which outlines the proposed management of the student accommodation to avoid detrimental impacts to the amenity of the surrounding landowners, tenants and residents. The increase in the local student population will contribute to increased spending and economic growth within the locality and offer employment opportunities during its construction and operation.
Vehicular Access Vehicle access to the proposal (i.e. for deliveries, loading and rubbish removal) given there is no residential parking.	All loading and waste collection activities will be undertaken within the adjacent student accommodation on 90-102 Regent Street accessed via William Lane. This will provide for greater activation of the William Lane frontage with increased passive surveillance. It will also provide greater site efficiencies, noting the approved loading area can accommodate the deliveries and collections expected to be required for both sites.
Construction Impacts Three concurrent construction projects sites is a lot of activity in one block.	The potential construction impacts will be managed by the Construction Management Plan (**Appendix AA**).

6. ENVIRONMENTAL IMPACT ASSESSMENT

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS (**Appendix A**).
- Statutory compliance table identifying where the relevant statutory requirements have been addressed (**Appendix C**).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (**Appendix D**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix E**).

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

6.1. DETAILED ASSESSMENT IMPACTS

This section of the report provides a detailed assessment of the key issues which could have a significant impact on the site and locality. It provides a comprehensive assessment of the relevant issues and the mitigation measures required to avoid, mitigate and/or offset the impacts of the project.

6.1.1. Design Excellence

The preliminary building design was significantly amended and refined during the preparation of the SSDA. The final architectural drawings (attached at **Appendix G**) have responded to the detailed design feedback provided by the GANSW and SDRP in the four design briefings held on 3 March 2021, 9 June 2021, 21 July 2021 and 15 September 2021.

On 29 September 2021, GANSW noted the following design elements from SDRP 4 were improvements in response to the advice from previous SDRP sessions:

- The redistribution of GFA in response to contextual and urban considerations, specifically:
  - The bulk of the tower form shifted towards the northern site boundary (and away from St Luke's Presbyterian Church).
  - Podium has a nil setback to Regent Street which aligns with the approved 90-102 Regent Street podium and other developments further north.
  - The podium has been setback a minimum of 4.6m along Margaret Street (greater than permissible) allowing for improved relationship with St Luke's Presbyterian Church.
  - The tower form has been setback 7.6m from the southern boundary (greater than 4m required) to improve the relationship with St Luke's Presbyterian Church.
  - The southern tower has a 16 storey height (less than permissible) to improve the transition to the south and reduce bulk and mass impacts.
- Increased capacity for street planting to Margaret Street (although the modest scaled Watergums are considered lacking in ambition for the space)
- Improved relationships between communal spaces, circulation and accommodation at the podium levels
- Communal outdoor spaces above ground level, including the southern tower rooftop location with its ambition for landscaped and covered areas.
- Consultation undertaken to date with the Aboriginal community is commended, as a result there is greater clarity for the following:
  - Basket weave façade pattern confirmed as culturally appropriate

– The role of Indigigrow

– The intent to consult further with a prominent member of the local Aboriginal community.

GANSW also provided recommendations to be addressed in the final architectural response. Each of the recommendations has been addressed by Antoniades Architects in their Design Report (**Appendix H**) and as summarised in **Table 21** below.

Table 21 Consistency with GANSW Feedback – 29 September 2021

GANSW Recommendation	Proponent Response	Consistency
Country and Aboriginal Cultural Heritage		
It is re-iterated (refer SDRP 3) that in-person consultation with community is critical. Allow sufficient time (in the context of COVID-19) to ensure outcomes from the consultation process may be implemented.	Numerous meetings were held with the Gadigal Elders, including one on site to discuss proposal and input from community. This engagement is further detailed in the Connection with Country Report prepared by WSP (**Appendix GG**).	Yes
Regarding the weaving pattern at the façade: ▪ avoid cultural appropriation by ensuring the supporting narrative is approved by knowledge holders in the community ▪ seek opportunities to embed the weaving story into the project so it can be understood that the pattern comes from Aboriginal culture (e.g. via interpretation and/or installations explaining the basis of the design).	The project team engaged WSP to facilitate engagement with Gadigal Elders. A Connection with Country Report was prepared by WSP (**Appendix GG**) to document Connecting to Country principles, activities and engagements that have been undertaken to shape the design. Through the ongoing co-design process and engagement of Gadigal Elders, a range of design outcomes have been influenced by Indigenous culture. These include: ▪ **Gadigal weaving**: Nadeena Dixon, Gadigal Elder and artist recommended the incorporation of a weaving pattern to signify the traditional custodians who used weaving day to day. The weaving pattern has been replicated in the podium façade and the external and internal floor treatments. ▪ **Mundoie Footprint way-finding concept:** Uncle Allan Madden Gadigal Elder recommended the incorporation of footprint patterns for users of the building the pathway to follow when moving through. ▪ **Indigenous planting:** further consultation with indigenous landscape architect Lilly Madden will be undertaken during detailed design.	Yes

GANSW Recommendation	Proponent Response	Consistency
	▪ **Indigenous art:** Installation of a decorative art that will educate students and pedestrians about Aboriginal culture.	
Increase consultation with Aboriginal knowledge holders on colour and material selections to ensure alignment with Connecting with Country aspirations.	The project team and WSP engaged with Gadigal Elders who provided recommendations to the proposed design (**Appendix GG**).	Yes
Adopt sustainability principles that come from Country (e.g. the principle of 'do no harm'). Consider materials that have low environmental impacts and are locally sourced or recycled (as appropriate). For example, source recycled stone in lieu of quarried stone, source recycled bricks where possible.	The Connection with Country Report prepared by WSP (**Appendix GG**) recommends connecting the site to country though tangible and intangible outcomes. Antoniades Architects have incorporated locally sourced and robust materials to be used throughout the building and public domain.	Yes
Public Domain/Landscape		
Simplify the irregular geometries at the building perimeter of both the ground floor plane and podium to optimise the public domain and simplify the relationship between the proposal and its surroundings. Provide increased spatial clarity and definition for circulation, entries and building interface through simplification and rationalisation of form and shape.	The podium and tower have been further setback from the southern boundary to increase building separation to St Luke's Presbyterian Church and improve the public domain at the street level. Antoniades Architects have further developed the entries and public domain with consideration of cultural integration and place making.	Yes
As part of the redesign for the above, explore further setbacks to Margaret Street and decreased GFA to the ground floor (to align with the 7:1 FSR requirement).	Increased setbacks have been introduced on the Margaret Street frontage at both podium and tower levels, reducing the total GFA and enhancing the public domain outcomes.	Yes
At Margaret Street provide street trees of a generous scale. Water gums are not supported and are applicable to more compromised locations (e.g. narrow streets and/or conflicts with powerlines or structures).	Due to the existing services and reduced footpaths, RPS have proposed / maintained the City of Sydney masterplan streetscape which proposes Water Gums *Tristaniopsis laurina* to Margaret Street. The Water Gums *Tristaniopsis laurina* have also already been approved to the adjacent site on Margaret Street and it is	Yes

GANSW Recommendation	Proponent Response	Consistency
	important to carry this language down the remainder of Margaret Street.	
Massing/Setbacks/Form		
Reduce GFA to provide an FSR of 7:1 (a nominal reduction of 150m²). GFA beyond this control is not supported.	The gross floor area has been reduced to comply with the maximum FSR of 7:1. It is noted that a maximum 7.7:1 could be achieved in accordance with the new Housing SEPP.	Yes
Review the articulation of the southern tower form to provide a more compatible massing relationship with the podium and northern tower form.	Antoniades Architects have designed a distinctive and legible tower form with refined modulation and articulation. This form has reduced the scale and mass to the south and increases towards the northern portion of the site.	Yes
Architecture/ Amenity/ Sustainability		
Cross ventilation relative to traffic and noise impacts– from the limited detail provided, plenum sizes are not convincing and impacts on ceiling heights are not fully understood. Further design development is required consistent with City of Sydney guidelines.	The units have been assessed via dynamic simulation to demonstrate that the alternate mechanical ventilation proposed can meet the requirements outlined in the City of Sydney guidelines.	Yes
Commitments to sustainability (e.g. rating systems) and integrated sustainability initiatives were not included in the presentation; it is recommended they be developed and documented for inclusion in the EIS.	Vipac Engineers have prepared a suite of documents to assess the sustainability and efficiency of the proposed development (**Appendix I**; **Appendix J**; **Appendix K**). In summary, the key commitments to sustainability include: ▪ Load reduction through use of energy efficient devices. ▪ Optimising energy, water and material consumption through use of energy efficient devices. ▪ Use of renewable resources, including solar panels on the roof. ▪ Indoor environmental quality – achieving high levels of natural ventilation and solar access.	Yes

Each of the additional matters outlined within the Design Excellence Strategy will be addressed during the assessment of the SSDA, including further refinement of the current drawings, as considered appropriate.

6.1.2. Built Form and Urban Design

The Design Report prepared by Antoniades Architects (**Appendix H**) provides a comprehensive assessment of the urban context, including the way in which the proposed built form, height, bulk and scale, setbacks and interface responds to the existing, approved and likely future development within the surrounding locality and the public domain.

Building Separation and Setbacks

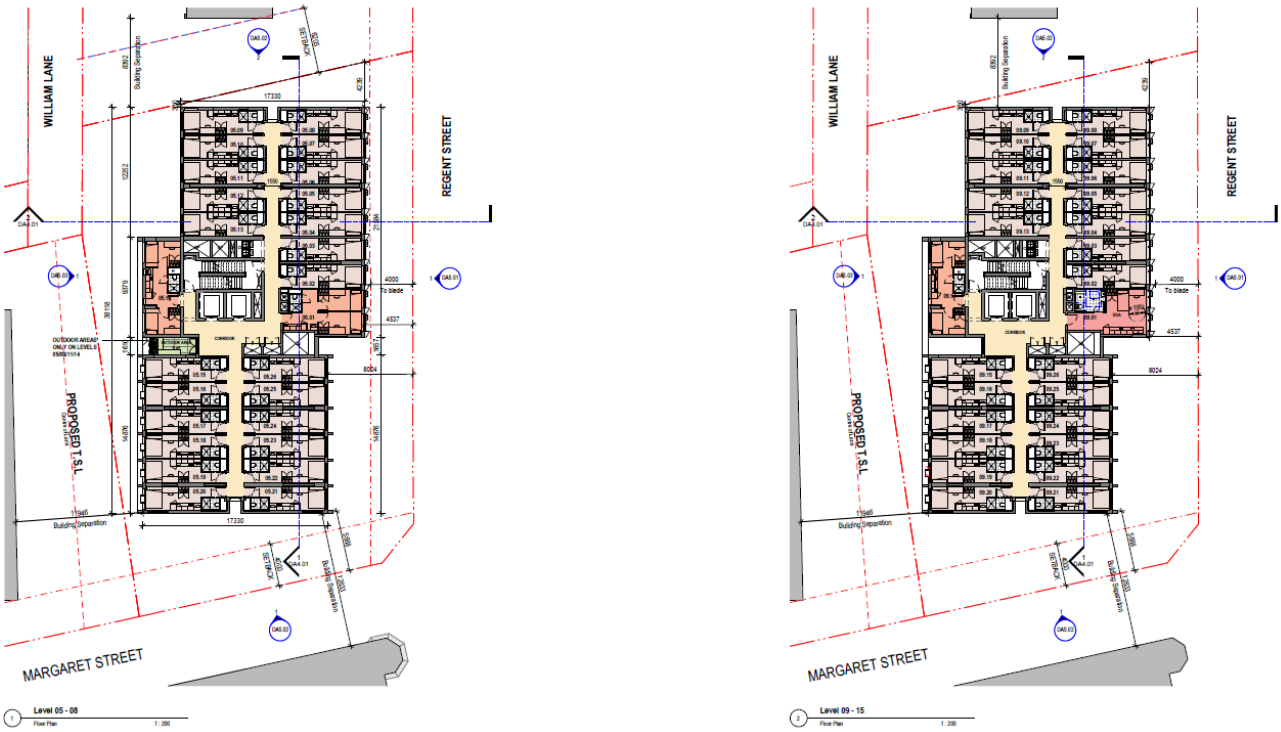
Following advice from the four SDRP meetings, Antoniades Architects redistributed the gross floor area of the proposal in response to contextual and urban considerations. Specifically:

- The podium has a nil setback to Regent Street which aligns with the approved 90-102 Regent Street podium and other developments further north and a minimum setback of 4.6m along Margaret Street to achieve an appropriate separation from St Luke's Presbyterian Church.
- The tower form has been setback 7.6m from the southern boundary (greater than 4m required) to improve the relationship with St Luke's Presbyterian Church.
- The southern tower steps down in height to improve the transition to the south and reduce potential impacts.

The building separation plans prepared by Antoniades Architects in the Architectural Plans (**Appendix G**) demonstrate the way in which the building has been sited and designed to provide appropriate separation between the tower and the existing and approved buildings to the north and west the site, considering potential visual and privacy impacts and optimising the distance between the tower and the buildings to the south.

The proposed building separations and setbacks for Levels 5-8 and Levels 9-15 are shown on the figure below. Where separation distances are less than the recommended distances within the UDP, privacy mitigation measures are included to avoid adverse impacts on visual privacy. Antoniades Architects have designed hoods to the windows facing William Lane and 90-102 Regent Street to maximise visual privacy. Visual privacy is further discussed in **Section 6.1.7**.

Figure 21 Building Separations and Setbacks



Source: Antoniades Architects

Overshadowing Impacts

The proposed development complies with the maximum building height controls and has been sited to provide for satisfactory separation distances between the western development (13- 23 Gibbons Street), northern development (90-102 Regent Street) and southern development (St Luke's Presbyterian Church).

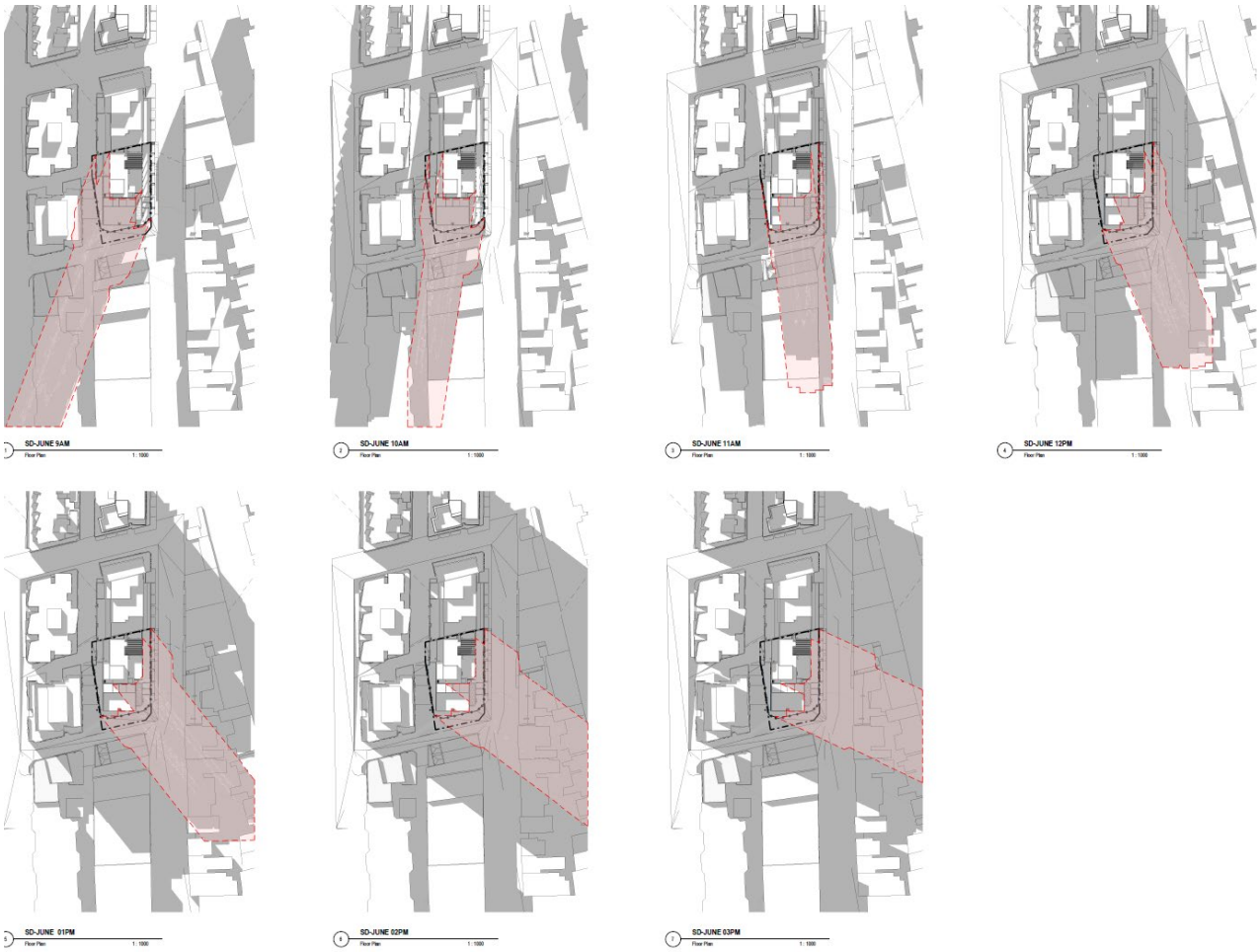
The Architectural Plans (**Appendix G**) provide a comprehensive assessment of the potential shadow impacts of the proposed development. An extract of the overshadowing diagram is at **Figure 22** below.

The existing (grey outline) and proposed (pink outline) shadow diagrams show that the locality is affected by the existing and approved developments to the north and west of the site, including the approved developments at 80-88 Regent Street, 11 Gibbons Street, 13-23 Gibbons Street and 90-102 Regent Street.

The properties further south of Margaret Street will also be impacted by additional overshadowing due to the proposed development. However, the impacts are limited to the mid-morning period, with most of the shadow impacts along the Regent Street properties absorbed by the shadow impacts of developments to the north and west of the site.

Similarly, the proposed development will not create additional overshadowing impacts to the existing overshadowing to the properties on the western side of Regent Street, as demonstrated on the overshadowing plans below (**Figure 22)**.

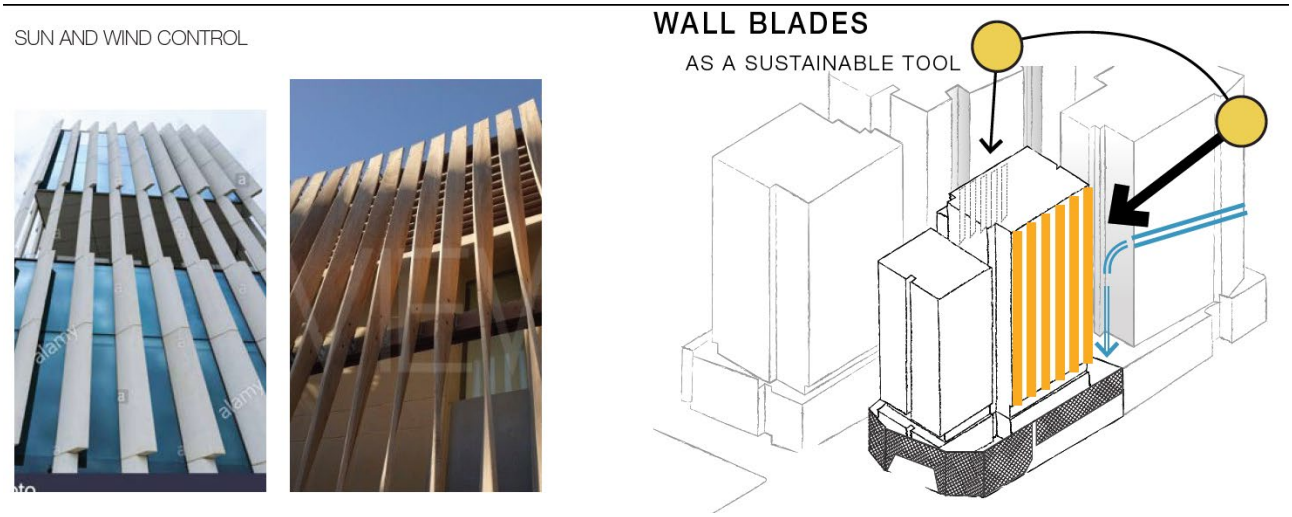
Figure 22 Overshadowing Plan



Source: Antoniades Architects

The proposed built form has been designed to avoid unacceptable shadow impacts to surrounding properties and the public domain. Antoniades Architects have incorporated vertical blades on the Regent Street and William Lane frontages to optimise solar access, as shown **Figure 23** below.

Figure 23 Vertical Blades Concept



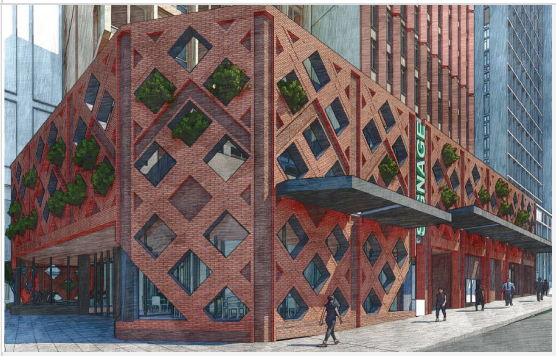
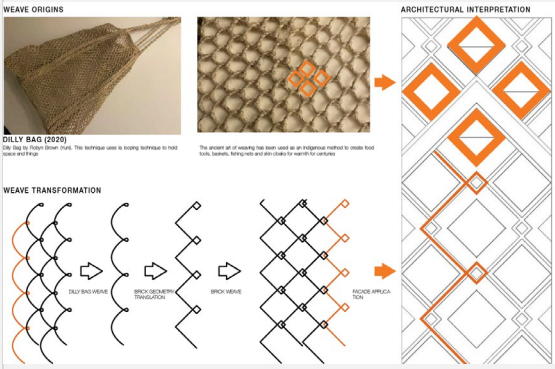
Source: Antoniades Architects

Connection with Country

The design also incorporates the key recommendations provided in the Connection with Country Report prepared by WSP (outlined in detail in **Appendix GG**). The key design elements which have been informed by the Connecting with Country framework and co-design process with Gadigal Elders are summarised in the table below.

Table 22 Impact of Connecting with Country Engagement on the Final Design

Concept	Raised By	Design Response
Gadigal Weaving Gadigal people used natural materials sourced from Country to weave objects they needed to thrive such as dilly bags, fishing nets, strong fishing lines, mats to sleep on and other objects. During the process of collecting materials and weaving up objects the people would yarn, tell stories and talk about the cultural significance of the materials, places they were collected from and techniques used to make different items.	Nadeena Dixon, Gadigal Elder and artist	The weaving pattern has been replicated in the podium façade and the external and internal floor treatments. The co-design process resulted in the traditional weaving pattern being translated into a strong repetitive pattern that has been used on the podium design and throughout the building.

Concept	Raised By	Design Response
		  A plaque will be located at eye level amongst the weaves, to inform the community about the significance of weaving patterns to Aboriginal culture.
'Mundoie Footprint' way-finding concept This unique pattern is from a rock engraving in near the Sydney Harbour. It is to be thought to be the footprint of a creator being and therefore it is highly significant as an iconic design that is from this Country. Engraving into horizontal sandstone rock is a unique cultural activity largely contained within the Sydney region and surrounds.	Uncle Allan Madden Gadigal Elder	This way finding opportunity was identified by Uncle Allen as a way for people to navigate through the building allowing for legibility while providing a cultural layer to the interior design. Uncle Allan explained the importance of the students in understanding the theming and stories of Gadigal Country. These footprints suggest to the users of the building the pathway to follow when moving through the building, while bringing some cultural elements into the interior design. The footsteps pattern will be addressed in the future detailed design.

Concept	Raised By	Design Response
		
Indigenous Planting Incorporating native species that were used by the indigenous population.	Uncle Chicka and Allan Madden Gadigal Elders	Uncle Chicka nominated his granddaughter, Lilly Madden, who holds knowledge of plants, to assist with the landscape species palette during the detailed design phase for the project.
Ochre and the Shields Gadigal country has a unique colour and design patterns as seen on the shield, rock carvings.	Uncle Chicka and Allan Madden Gadigal Elders	The patterns will be carved into the pavement, seating and other surface elements. 
Indigenous Art on Building Fins The precast façade to the south provides an opportunity to display local Aboriginal art. This may be coordinated through a select invitation process targeting Gadigal artists.	Uncle Chicka and Allan Madden Gadigal Elders	Indigenous artwork will be investigated and delivered during the detailed design phase.

The final proposal has incorporated the following design techniques and strategies:

- The proposal includes public domain improvements, including street tree planting, paving and seating to contribute to activate the north-south through site link through William Lane.
- Incorporated learnings from Gadigal Elders through the weaving patterns through the podium design, pavement and seating areas.
- Improved east-west connectivity through public domain improvements to Margaret Street.
- Aligned the proposed podium with the adjoining approved 18 storey mixed use development at 90-102 Regent Street, Redfern.
- Stepped the southern portion of the tower down to improve the relationship with St Luke's Presbyterian Church.
- Increased the Margaret Street podium setback to improve the built form transition to St Luke's Presbyterian Church.

Based on the above, it is considered that the proposed development is appropriate having regard to its built form and the way in which it responds to the existing, approved and likely future development within the locality and the public domain.

Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (**CPTED**) Report has been prepared by Elton Consulting (**Appendix M**). The CPTED Assessment makes recommendations relating to crime prevention elements and treatments to be incorporated in the development design to minimise risk or opportunities for crimes to occur.

The methodology included a policy review, desktop site analysis to determine crime profile and assessment and recommendations. Elton Consulting provided the following mitigation measures to minimise opportunities for crime across the site:

- Access to the building: provide adequate lighting; install CCTV and ensure the landscaping maintains clear sightlines and does not allow opportunities for concealment.
- Landscaping: landscaping should be maintained to have low shrubs and reduce density.
- Surveillance: maximise natural surveillance through the provisions of windows and doors.
- Lighting: provide lighting at entry/exit points, service areas and loading areas.
- CCTV: CCTV should be installed at all entry/exit points and external areas of the building.
- Materials: Materials and fixtures utilised should not create opportunities for vandalism.

Elton Consulting conclude that the site can be made suitable for the proposed development subject to the adoption and implementation of the above mitigation measures.

Accessibility

Accessible Building Solutions has prepared a Statement of Compliance: Access for People with a Disability (**Appendix HH**) which assesses the accessibility of the proposed development in accordance with the relevant legislation.

The report recognises there is generally insufficient detail at the DA stage to confirm compliance with the detailed requirements. The report identifies where the proposal is 'capable of compliance' with the relevant standards at the detailed design stage and considering:

- Access Provisions of the BCA 2019
- Access to Premises Standard
- AS1428 Standards
- AS1735.12 for lifts

- City of Sydney DCP requirements relating to access for people with a disability

The report includes a comprehensive assessment of the relevant standards and level of compliance based on the current architectural drawings. It includes site-specific comments relevant to the proposed development and the matters that will need to be addressed at the detailed design stage, including accessibility to/from the building, through the common areas and within the accessible studio rooms.

Overall, it is concluded the proposal can achieve compliance with the access provisions of the BCA and the Access to Premises Standard.

6.1.3. Building Use

The retail tenancy is 72m² and includes a bathroom and kitchen. The proposed student accommodation consists of the following room types:

- Studio A: kitchen, bed, bathroom, study desk.
- En-suite: bed, bathroom, study desk, fridge. Communal areas (with kitchens) are provided on both levels that have en suite bedrooms (Level 2 and 4).
- 2 bedroom: two bedrooms with a shared kitchen and bathroom.
- Accessible rooms: DDA accessible rooms.

The table below identifies the proposed land uses including a floor-by-floor breakdown of uses and gross floor area.

Table 23 Floor by Floor Breakdown of Building Use

Floor	**Uses**	**GFA**
Ground Floor	Lobby and reception area; retail area; communal areas; bicycle parking; gym; study areas; building services and waste rooms.	822m²
Level 2	7 x Studio A; 5 en-suite; 1 x 2 bedroom; communal kitchen and area including cinema 180m²; Level 2 open space 424m².	517m²
Level 3	24 x Studio A; 2x 2 bedroom.	565m²
Level 4	20 x en-suite rooms; 30m² of communal area and 37m² of outdoor area.	499m²
Level 5- 8	24 x Studio A; 2x 2 bedroom.	565m² (per level)
Level 9- 15	24 x Studio A; 1x 2 bedroom; 1x accessible room.	565m² (per level)
Level 16	12 x Studio A; 2x 2 bedroom; sky garden landscaped open area (240m²).	334m²
Level 17/18	12 x Studio A; 1x 2 bedroom.	305m² (per level)
Roof	Fire tanks; hot water plants; condenser units and lift overrun; solar panels on the roof.	Nil
Total GFA		**9,562m²**

Operational Details

The proposed retail premises will operate 7am and 10pm, seven days a week. The student housing component will operate 24 hours per day, seven days per week. The proposed development will generate 220 jobs during construction and five jobs during the operational phase.

The site is located within a 'Local Centre Area' in accordance with the City of Sydney DCP. The tenant of the proposed retail premises is not yet known, however, it is likely that it could comprise a food and drink premises. The proposed use could be considered a 'Category B − Low Impact Premises' if the proposed use was likely to impact on the amenity and safety of the neighbourhood. The proposed trading hours of 7am to 10pm comply with the base hours for a Category B development as listed in the DCP for indoor activities.

Any proposal for outdoor dining or extended trading hours would be subject to a separate approvals process. A Plan of Management is not required for a Category B premises which does not trade after 10pm.

An Operational Management Plan (**OMP**) has been prepared by Wee Hur for the student accommodation component and is provided at **Appendix Y**. The Level 2 and 16 outdoor terraces will be limited to resident use between 8am to 10pm every day. Access to the building will be via the ground floor foyer entries on Regent Street and Margaret Street, with electronic door locking systems which require key cards to enter.

An Operational Waste Management Plan (**OWMP**) has been prepared by Waste Audit (**Appendix L**). A garbage room with areas for residential and retail waste and recycling will be located on the ground floor in proximity to the loading dock. All loading and waste collection activities will be undertaken on the adjacent student accommodation on 90-102 Regent Street within the proposed loading area. The loading area will be accessed via William Lane.

6.1.4. Visual Impacts

Urbis was engaged to prepare a Visual Impact Assessment (**VIA**) to assess the potential visual impacts of the proposed development (**Appendix II**). The VIA details the view impacts considering the current site conditions and the proposed site situation. The VIA methodology is separated into three stages, as summarised below:

- Assessment of visual effects on baseline factors
- Assessment of visual effects and visual impacts
- Significance of residual visual impact on existing and future character

The VIA establishes the visual character of the site and its immediate surrounds to be used as a baseline factor against which to judge the level of change caused by the proposed development.

6.1.4.1. Existing Environment

The potential visual catchment is summarised as follows:

- **North**: Views are constrained predominantly to street corridors by building development. From the north, potential views to the site including to the proposed podium and tower are constrained to a short section of Regent Street approximately between its intersections with Redfern Street and Boundary Road.
- **South:** Parts of the tower will be visible in close views from Margaret Street and William Lane and from the south-west in close views from parts of Gibbons Street Park. Further south views to the site would be restricted to the upper parts of the proposed tower form due to intervening development.
- **East:** The potential visual catchment extends to the east towards Redfern Park and for a short section of Redfern Street approximately to its intersection with George Street. The upper parts of the proposed development will be visible in isolated views from Redfern Street, Turner Street and the south end of George Street.
- **West**: The potential visual catchment is limited to the west by intervening buildings including towers located in Gibbons Street. However, as low rise development characterises the rail corridor, some visibility of the top of the tower form would occur.

In recent years the Redfern area has seen the replacement of older, non-heritage buildings from the mid-20th century with contemporary developments and an increase in the number of developments with a

greater height than traditionally seen in the area, particularly within the Redfern-Waterloo Authority Sites SSP.

6.1.4.2. Potential Impacts

The VIA provides an assessment of existing views and the proposed detailed design from key vantage points within Redfern and the public domain. 24 view locations were selected based on field work and analysis of the potential visual catchment.

Each of the selected views is described and assessed, considering the potential visual effects of the proposed development including visual character, scenic quality of view, view composition, viewing level, viewing period, viewing distance and view loss and view blocking effects. The selected view points are shown in the figure below.

Figure 24 Selected Viewpoints – VIA

Source: Urbis

An overall rating of the significance of the visual impact is provided based on assessment of:

- Public domain view place sensitivity;
- Visual absorption capacity;
- Compatibility with the urban features.

Seven of the selected views were deemed to have a 'low' significance of visual impact. View 5 which comprises the view west from the Cope Street Carpark was deemed to have a low- medium impact. View 6 (view south west from 135 Regent Street) and View 15 (view north west from opposite the site) was considered to have a medium impact. Each of these views is described in further detail below, accompanied by report extracts which show the existing site conditions and the proposed development:

- **View 5**: This view on Cope Street east of the subject site is characterised in the foreground by a carpark, established street trees and medium density residential development of 3-4 storey. The east elevation of the proposed development is visible above the terrace style development and street trees on Cope Street. The proposed development is not dissimilar in height, form or character to other neighbouring approved and existing towers. The built form proposed is compatible with the existing and desired future character of this part of Redfern which is transitioning to include a higher proportion of high-density tower forms.

Figure 25 View 5 Impact

FIGURE 21 EXISTING CONDITIONS

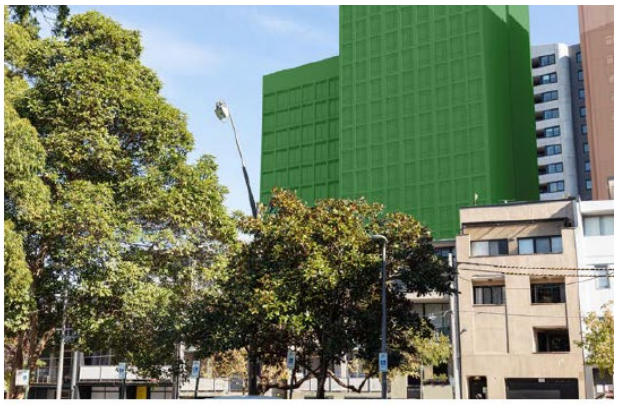


FIGURE 22 PHOTOMONTAGE OF PROPOSED DEVELOPMENT

Source: Urbis

- **View 6**: The south edge of the composition is characterised by the open expanse of the site, St Luke's Presbyterian Church and residential development. The proposal will introduce new built form into the foreground composition of the view where the podium including ground floor glazed communal areas part of the north elevation will be visible. The perception of the bulk and scale of the podium will be partly relieved by the proposed architectural detailing and setback of the podium from Margaret Street.

Figure 26 View 6 Impact

FIGURE 25 EXISTING CONDITIONS

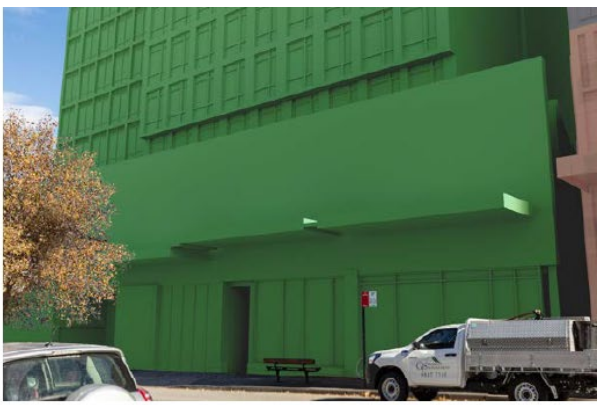


FIGURE 26 PHOTOMONTAGE OF PROPOSED DEVELOPMENT

Source: Urbis

- **View 15**: The composition of the view is characterised by older lower buildings and contemporary tower forms, where the streetscape is devoid of street trees. The proposed development will introduce a new built form into the foreground composition of the view. The lower levels of both the east and southern elevations will be visible. The proposed architectural detailing and setbacks to the podium including ground floor glazing collectively will help to reduce the perception of the bulk and scale of the podium from in this close view.

Figure 27 View 15 Impact

FIGURE 37 EXISTING CONDITIONS

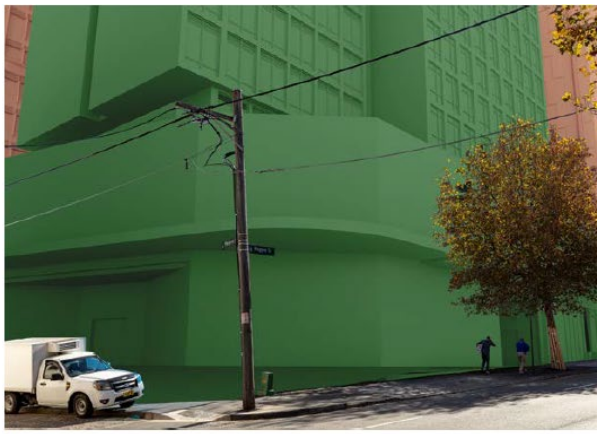


FIGURE 38 PHOTOMONTAGE OF PROPOSED DEVELOPMENT

Source: Urbis

Urbis find there are no highly sensitive public domain view locations in the vicinity of the site such as public reserves from which there is high visibility of the site or of the proposed development. No specific important views or vistas were identified in City of Sydney LEP and DCP for the site and surroundings.

The height, form and character of the proposed built forms is comparable and not dissimilar to others within the existing visual context including those approved and under construction. The podium and tower form proposed does not block access to any documented views, views to sensitive locations, areas of high scenic quality or heritage items.

Based on the above, no additional mitigation measures are recommended to address the potential visual impacts of the proposed development.

6.1.5. Public Space

The Architectural Plans prepared by Antoniades Architects (**Appendix G**) and Landscape Plans prepared by RPS Landscape (**Appendix X**) detail the proposed William Lane public laneway. The design of William Lane has been based on Connecting with Country principles, specifically:

- Awakening lost landscapes
- Learning from country
- Building relationships with water
- Places for sharing and meeting.

Further, the site design drivers in the design of William Lane include:

- Accessibility
- Sustainable systems
- Greener places
- Integrated art.

The Landscape Plans include extensive public domain works along William Lane, including timber bridges for meeting and gathering, a focal meeting tree towards Margaret Steet. A rain garden with educational elements and an interpretative art and fishing tools.

The proposal includes extensive public domain improvements including provision of a landscaped through-site link connecting William Lane to Margaret Street and associated improvements to the Regent Street and Margaret Street frontages, including awnings and footpath upgrades.

The lane way will be owned by Wee Hur with City of Sydney Council granted an easement over the land for public use. Maintenance of the landscaping will be managed by Wee Hur.

Figure 28 Indicative William Lane Public Domain Illustration

Source: RPS Landscape

6.1.6. Trees and Landscaping

A Landscape Plan has been prepared by RPS Landscape (**Appendix X**) which incorporates the landscape treatment of the podium roof-top and public domain improvements along the Regent Street, Margaret Street and William Street frontages.

The proposed landscaping and planting plan includes a range of native vegetation communities and plant species. The species were selected in consultation with Indigigrow and Gadigal Elder Uncle Chicka's granddaughter Lilly Madden (Indigenous landscape designers). This has ensured the vegetation at the site was chosen for its suitability and cultural significance. Specifically, the planting species include:

- Quandong trees
- Flame bottle tree
- Kanooka Gums
- Grass trees
- Gymea lily
- Blueberry Ash
- Weeping Lillypilly

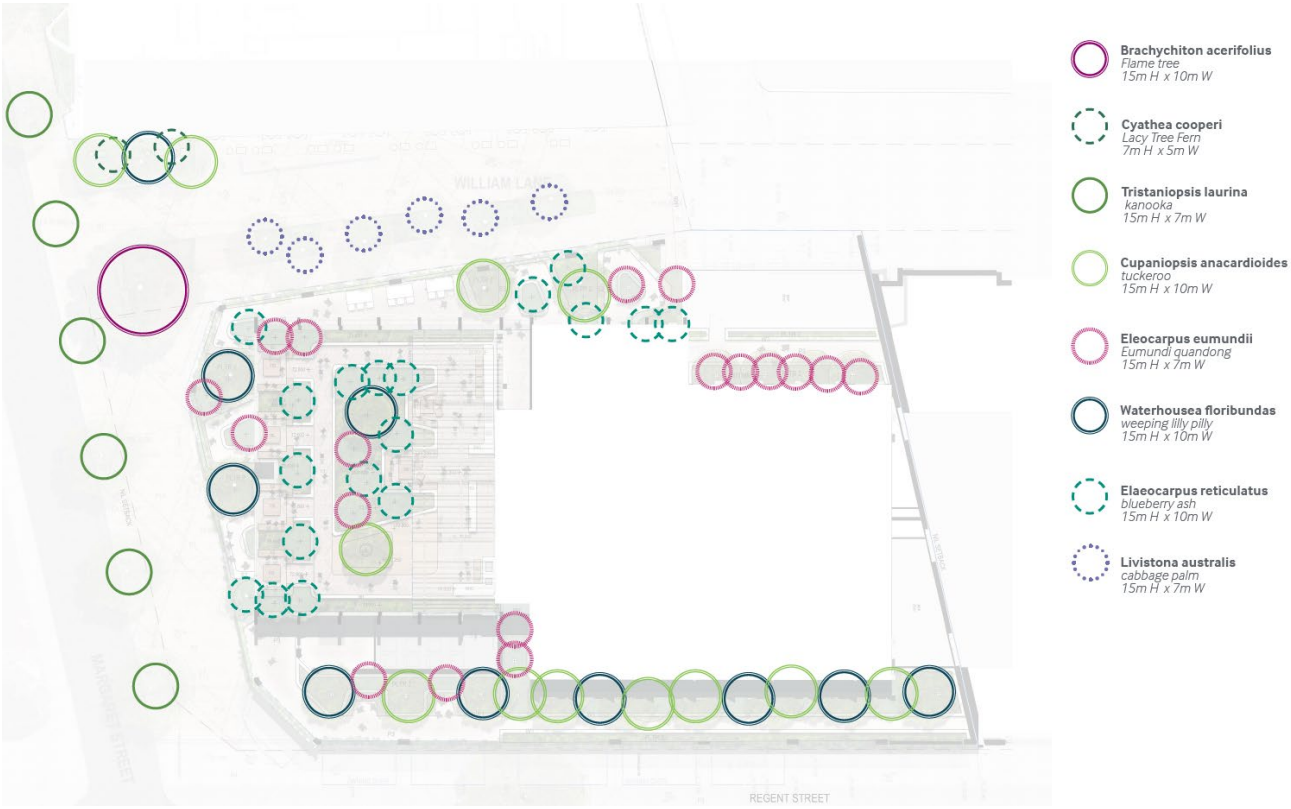
These species are shown on the planting schedule at the figure below.

Figure 29 Planting Schedule

Source: RPS Landscape

The proposed tree plan includes the significant tree planting of planting of Kanooka Gum Trees along Margaret Street, a Flame Tree in the centre of the William Lane public open space, and a range of native trees on the Level 2 and Level 16 communal open spaces. The tree plan is provided in the figure below.

Figure 30 Tree Planting Plan



Source: RPS Landscape

The proposed tree plantings will contribute to greening the city, reducing the urban heat island effect and increasing green infrastructure.

Tree Removal

An Arboricultural Impact Assessment has been prepared by Urban Arbor and is provided at **Appendix DD**. The AIA assesses the existing street tree on the Regent Street frontage provides tree protection measures in accordance with AS4970-2009.

Tree 1 is a semi-mature London Plane (Platanus x acerifolia) that adjoins the site on Regent Street. The tree has an approximate height of 12m and a crown spread of 5m. At the time of the inspection, the tree was displaying good health and vigour for the species and no significant structural defects were identified.

The proposed awning on the new development is located within 0.5m of the trunk of tree 1. The tree will be impacted by the proposed development works, including the combined impact of root and canopy pruning. The tree has therefore been recommended to be removed.

6.1.7. Environmental Amenity

The proposal achieves a high level of environmental amenity within the proposal and on surrounding buildings. The following sections demonstrate how potential environmental impacts have been mitigated.

Reflectivity

An Environmental Glare and Reflectivity Assessment was prepared by SLR Consulting (**Appendix JJ**) which assesses the reflectivity of the proposed facades. A summary of the methodology, assessment and recommended mitigation measures is provided below.

Figure 31 Possible Reflectivity Conditions Ground Levels

Source: SLR Consulting

The following mitigation measures are recommended by SLR Consulting to minimise glare and reflectivity:

- The facades are to have a reflectivity coefficient of less than 20%.
- Existing and proposed landscaping is recommended to be retained to the surrounds of the proposed development.
- Façade elements including setbacks and mullion protrusions are to be retained as specified unless otherwise stated within the body of this report.
- The development should retain current proportions and orientation of glazing.

SLR Consulting conclude the proposed development will cause neither traffic disability glare nor pedestrian discomfort glare on surrounding public areas.

Light Spill

SLR Consulting has prepared a Qualitative Light Spill Assessment (**Appendix KK**) which assesses the lighting environment around the proposed development.

A light survey was conducted on 18 November 2021 with measurements taken around the edge of the site and several facades facing the site. Measurements were made in the horizontal plane with the light meter pointing upward normal to the ground and in the vertical plane where the light meter was aimed toward the site.

The light survey showed a significant amount of night-time lighting in the surrounding area with locations showing illuminance values above the required limits. The light sources included the traffic on Regent Street, and commercial tenancies along Regent Street.

SLR's qualitative assessment found external lighting will be required throughout the Ground Level, Level 2 outdoor communal area and Level 16 outdoor communal area. The following mitigation measures are recommended by SLR Consulting to minimise light spill impacts:

Site Specific Recommendations

- Direct lights downward where possible.
- Use luminaires which aim to minimise light spill.
- Minimise glare by keeping the main beam angle less than 70°.
- Direct site lighting away from sensitive locations such as residential properties.
- Lighting shall be placed as far away from site boundaries as possible.

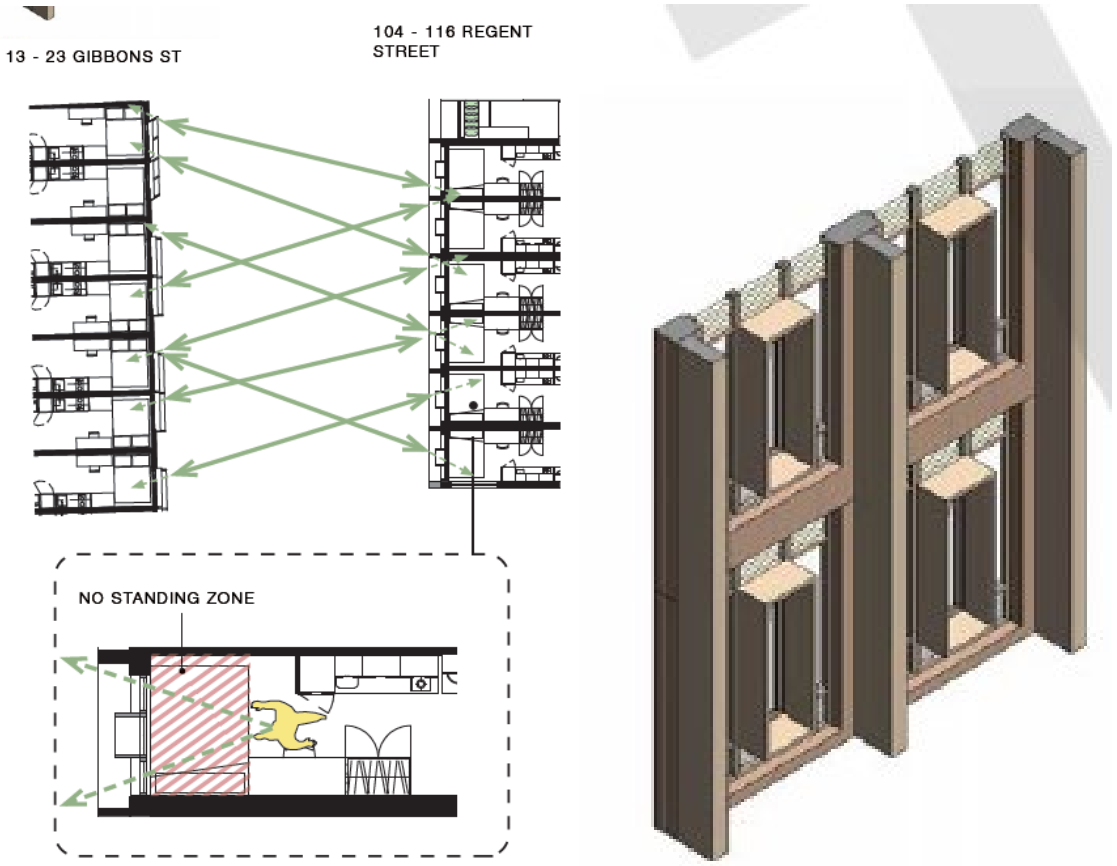
The adoption of the above recommended mitigation measures will enable the proposed development to achieve the desired outcome with no more than 2 lux falling on the nearby residential facades during curfew hours and no more than 4 lux at the boundaries of nearby commercial facades during curfew hours.

Visual Privacy

The potential visual privacy impacts were assessed based on the distance separation between the proposed building and the existing, approved or likely future development on the surrounding properties. Detailed consideration was given to the two adjoining student accommodation towers at 13-23 Gibbons Street and 90-102 Regent Street.

Privacy hoods form part of the window treatment to enhance privacy between the neighbouring buildings. The layouts of the room have increased visual privacy by creating a standing buffer zone from the window due to the positioning of the bed.

Table 24 Visual Privacy Design Treatment



Source: Antoniades Architects

Wind

SLR Consulting was engaged to prepare an Environmental Wind Tunnel Test (**Appendix LL**) to assess the ground level wind environment around the proposed development. The report includes wind tunnel testing to determine the potential wind impacts on the surrounding pedestrian level wind environment and assesses pedestrian safety, comfort and amenity in terms of footpaths, building entrances and private terraces.

The assessment was conducted using a Discrete Sensor Environmental Wind Tunnel Study where wind tunnel measurements were made to investigate wind conditions throughout and surrounding the proposed development. Key prevailing wind directions of are the northeast, southeast and south for summer and mainly west quadrant winds for winter.

The present study has adopted the so-called 'Melbourne' criteria for assessment, currently referenced by many Australian Local Government Development Control Plans in relation to wind impact. The baseline testing showed the pedestrian areas in surrounding thoroughfares were found to lie above the adopted 16 m/s walking comfort criterion, but all the locations lie below the 23 m/s safety criterion.

The future wind environment testing showed the wind conditions of potential concern in relation to the proposed development revealed by the wind tunnel study are:

- Selected footpath areas along Margaret Street and along the western frontage of the development
- The new Proposed Laneway to the west of the site
- The outdoor open areas of Level 2 and Level 16 – Locations 21 to 24.

Mitigation Measures

The following mitigation measures are proposed to minimise wind impacts at the pedestrian and podium levels:

- All replacement trees are evergreen and of similar foliage as the existing trees.

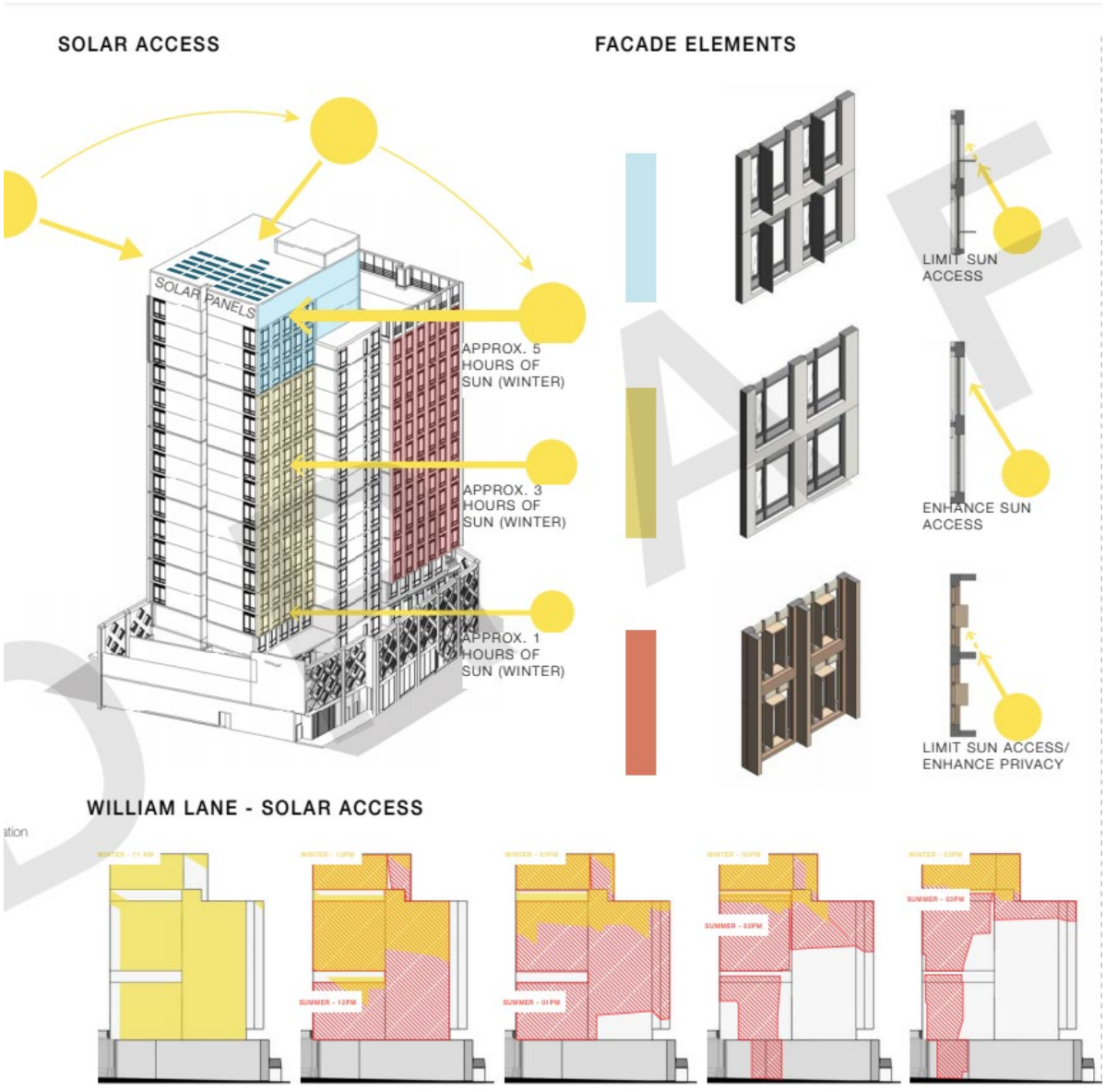
- The proposed vertical façade screening along the perimeter of the development should be retained.
- The proposed awning along the eastern façade should be continuous.
- It is recommended to include landscaping such as planter boxes in front of the primary entrance along Regent Street.
- The proposed tree plantings on the Level 2; 4 and 16 communal open areas are to be retained.

Overall, the Wind Impact Assessment confirms the proposed design complies with adopted wind acceptability criteria at all pedestrian and public access locations within and around the development.

Solar Access

The site has restricted solar access from the north and west due to the approved future developments 90-102 Regent Street and 13-23 Gibbons Street. The siting and design of the proposed building has been heavily influenced by the approved siting and design of these buildings, while optimising the site orientation and access to natural daylight. As demonstrated on the plan below, solar access is optimised through façade treatments.

Figure 32 Solar Access Plan



Source: Antoniades Architects Design Report (page 27)

6.1.8. Transport, Traffic, Parking and Access

The Transport Planning Partnership (**TTPP**) has prepared a suite of reports which address the transport, traffic, parking and access matters including:

- Transport Impact Assessment (**TIA**) (**Appendix N**) which assesses the impact of the proposed development on the surrounding transport network.
- Green Travel Plan (**GTP**) (**Appendix N**) which outlines the way in which travel demand will be managed in the future site operations.
- Framework Construction Traffic Management Plan (**CTMP**) (**Appendix N**) which outlines the matters to be addressed within the CTMP to be prepared in accordance with the approved development.

Each of these reports is addressed within the following section of the EIS.

6.1.8.1. Existing Environment

The site is highly accessible to public transport services. Redfern Railway Station is approximately 300 metres walking distance from the site and provides rail service connections to destinations across Sydney. A new Sydney Metro station is located at the corner of Raglan Street and Cope Street, approximately 400m walking distance from the subject site. Bus stops in the immediate locality provide connectivity to surrounding suburbs in the east, south and city.

An off-road shared path along Gibbons Street and Marian Street provides cycle linkages to Redfern Station, the University of Sydney, University of Technology Sydney, University of Notre Dame, TAFE and Sydney CBD. Pedestrian access is provided along both Margaret Street and Regent Street.

Regent Street is a one-way southbound State Road and Gibbons Street is a one-way northbound State Road, parallel to Regent Street. Margaret Street is a two-way local road that connects Regent Street and Gibbons Street.

6.1.8.2. Potential Impacts

The proposed development has been assessed based on its strategic transport context, agency consultation, an assessment of parking requirements based on the proposed land use and predicted modal share of transport movements. Consideration is given to the potential traffic generation of the proposal, the adequacy of the proposed loading and service vehicle provisions, CPTED principles, alternative forms of transport and preparation of a GTP to encourage sustainable transport modes.

The TIA concludes the site is well-serviced by high frequency public transport services and the future Sydney Metro Waterloo Station will provide additional travel options. Further, a TTPP study has shown a range of recently approved student accommodation around Sydney that provides no car parking spaces. This is outlined in Table 4.1 within the TIA.

On this basis, it is considered acceptable and appropriate that the proposed student accommodation development does not provide any on-site car parking. The lack of on-site car parking will discourage private car ownership, in alignment with the NSW Government and City of Sydney strategic transport objectives. The provision of 102 bicycle spaces is considered appropriate for the proposed student accommodation, considering the forecast travel demands.

TTPP's analysis has found the proposed student accommodation development would not generate any traffic for the following reasons:

- The majority of students would not own a motor vehicle;
- On-site parking is not provided for students (noting that students requiring access to an onsite car space would not consider living at this development);
- The site is located within walking distances to nearby public transport nodes including Redfern Railway Station; the future Waterloo Metro Station and bus stops on Regent and Gibbons Street;
- The site is located within walking distances to amenities, services, universities and other recreational facilities;

As such, the proposal is not expected to generate any adverse traffic impacts on the surrounding road network, nor any operational or safety issues on surrounding key intersections.

Loading and Service Vehicle Provisions

All loading and waste collection activities will be undertaken on the adjacent student accommodation on 90-102 Regent Street within the proposed loading area. The loading area will be accessed via William Lane.

6.1.8.3. Mitigation Measures

A Framework Construction Traffic Management Plan (**CTMP**) has been prepared by TTPP (**Appendix N**) which establishes the principles and objectives for construction traffic management and provides an indicative construction methodology to ensure the safety of the public and workers. The Framework CTMP will be further developed in consultation with the Sydney Coordination Office within TfNSW and a detailed CTMP finalised prior to the commencement of construction activities.

A Green Travel Plan (**GTP**) has also been prepared by TTPP (**Appendix N**) which encourages use of transport modes that have low environmental impacts, including walking, cycling, public transport, and better management of car use. The GTP will be implemented during the operational phase of the development, and includes provisions such as:

- Public transport maps provided on noticeboards, newsletters, websites, social media to alert students to the alternative transport options.
- A formal Travel Plan Co-ordinator (TPC) will develop, implement and monitor the GTP.
- The GTP will be monitored to ensure that it is achieving the desired benefits, including travel surveys to establish travel patterns and mode share of trips to and from the site. The GTP may be updated to influence further changes to the travel behaviour.
- Information within the GTP will be provided to students in a Travel Access Guide.

Design measures have been recommended by TTPP to maintain road and personal safety in line with the Crime Prevention through Environmental Design principles of surveillance, access control and space and activity management. These include:

- Ensure appropriate lighting is provided along Margaret Street and William Lane for students staying at the proposed student accommodation development.
- Trim or remove foliage blocking sight lines and ensure there is minimal obstruction to lines of sight near key pedestrian facilities and pedestrian access points.
- Ensure regular maintenance is in place including rubbish removal, graffiti removal, repair of light fixtures, trimming of vegetation and/or regular patrols, where feasible.

In summary, the traffic and parking implications are not expected to result in any discernible adverse impact on the surrounding road network, with management measures to ensure minimal traffic and parking implications for both construction and operation of the proposed student accommodation on the site.

6.1.9. Ecologically Sustainable Development and Climate Change

Vipac Engineers have prepared a suite of documents to assess the sustainability and efficiency of the proposed development. These reports include:

- A National Construction Code (NCC) Section J Assessment Report (**Appendix I**)
- BASIX Assessment Report (**Appendix J**)
- Alternative Performance Solution for Natural Ventilation (**Appendix K**).

6.1.9.1. Potential Impacts

The principles of ecologically sustainable development were an integral consideration in design of the proposed development. The sustainability targets for the development will be achieved in an integrated and staged approach through minimising the need for energy consumption (via passive measures) and then consumption optimisation (energy efficiency) and use of renewable resources, where required.

The development will meet and outperform the following regulatory sustainability requirements:

- BASIX – NSW Department of Planning and Environment
- NCC 2019 Section J (Energy Efficiency).

BASIX Certificate

The BASIX Certificate (Certificate No. 1259187M) prepared by Vipac Engineers confirms the proposal in the BASIX certificate the development meets and exceeds the minimum requirements for all following areas.

- Energy Efficiency
- Water Efficiency
- Thermal Comfort

Further, the proposal achieves the following targets:

- Energy Efficiency: 28% reduction (minimum requirements under BASIX: 25%)
- Water Efficiency: 41% reduction (minimum requirements under BASIX: 40%)
- Thermal Comfort: Will pass the thermal performance requirements under BASIX.

Alternative Performance Solution for Natural Ventilation

The Alternative Performance Solution for Natural Ventilation (**Appendix K**) prepared by Vipac assesses the proposed mechanical ventilation system to improve natural ventilation in habitable rooms. The proposed mechanical ventilation design has been evaluated using Computational Fluid Dynamic simulation to determine the overall impact on the following:

- Energy Efficiency – reduction in the Air-conditioning energy consumption (given the reduced reliance on active air-conditioning);
- Age of the indoor air;
- Thermal Comfort (PMV).

Vipac's assessment demonstrates the assessed habitable rooms meet the minimum performance requirements for greater than 90% of all hours of the year. The minimum level of ventilation has been met and adequate ventilation is achieved via the alternative ventilation proposal. The proposed ventilation design will result in the following improvements:

- Overall Energy Efficiency
- Thermal Comfort
- Age of air (freshness of the air).

The simulations also demonstrated that the energy generated by the proposed Solar PV system will be sufficient to offset the energy consumption of the proposed mechanical ventilation system. The estimated annual energy consumption for mechanical ventilation is 22,037 kWh per annum, while the estimated annual solar PV energy generation is 60,866 kWh per annum.

Section J Compliance

Vipac Engineers have reviewed the proposed development against the Deemed-to-Satisfy requirements for the National Construction Code 2019 provisions for energy efficiency under Section J (NCC 2019 Amendment 1 Volume 1).

This report nominates relevant NCC Section J requirements or 'deemed to satisfy' compliance provisions and possible areas in which alternative performance-based design solutions can be adopted where compliance with the nominated prescriptive provisions may not be practically achievable.

Vipac Engineers conclude, subject to satisfaction of the provisions outlined in this report, the proposed development will comply with the requirements of Section J of NCC 2019 Amendment 1.

6.1.10. Contamination

Several environmental investigations have been carried out on the site dating from 1999 to 2021. These investigations have confirmed that a limited extent of soils aesthetically impacted with petroleum hydrocarbons will be present in proximity of the site UPSS.

A Remediation Action Plan (**RAP**) relating to the site, an Addendum RAP and a letter of interim advice from an accredited site auditor was submitted with a local DA for the decommissioning of the petrol tanks (D/2020/1095).

A Site Audit Statement is attached at **Appendix BB** which confirms that the remediation and validation works have been completed in accordance with the Remedial Action Pan as prepared for the site. Accordingly, the site is considered suitable for its intended use.

6.1.11. Heritage

Weir Phillips was engaged to prepare a Heritage Impact Statement (**HIS**) (**Appendix W**) to assess the impacts of the proposed development on surrounding heritage items and potential archaeological elements. A summary of the assessment and recommended mitigation measures for both the built heritage and non-Aboriginal archaeology is provided below.

6.1.11.1. Existing Environment

The historical background to the site and its development is reviewed in detail, from the Aboriginal histories of the locality through to European settlement, early subdivision, 19th century industrialisation and more recent developments, including the importance of Redfern for Aboriginal people for employment, activism and community connections. In summary:

- The site is not located within a Heritage Conservation Area as defined by Schedule 5, Part 2 of the Sydney LEP 2012.
- The site is not listed as a heritage item by Schedule 5, Part 1 of the Sydney LEP 2012.
- The site is located within the vicinity of a heritage item per Schedule 5, Part 1 of the Sydney LEP 2012.
- The site is not listed on the State Heritage Register under the auspices of the NSW Heritage Act 1977.

A local heritage item “St Luke's Presbyterian Church including interior”, is located opposite the site to the south at 118 Regent Street, Redfern. Weir Phillips state the Church is a Victorian Gothic style church with an asymmetrical façade with an integrated tower at the north-east corner and a high pitched roof clad in slate.

There are three Heritage Items listed by Schedule 5, Part 1 of the Sydney LEP 2012 in the immediate vicinity of the site as well as one Heritage Conservation Area listed by Schedule 5, Part 2 of the same plan. These are summarised in the table below.

Table 25 Heritage Items in the Vicinity of the Proposal

Item/ Item Number	Address	Location from the Site	State Heritage Inventory Listing Sheet Statement of Significance
2421175 – Terrace House Including Interior	181 Regent Street, Redfern	50m south	Of historic and aesthetic significance as a relatively early representative example of a Victorian Filigree style terrace.
Eveleigh Railway Workshops – 5045103	Great Southern and Western Railway, Redfern	550m west	Eveleigh contains one of the most complete late 19th century and early 20th century forge installations, collection of cranes and power systems.

Item/ Item Number	Address	Location from the Site	State Heritage Inventory Listing Sheet Statement of Significance
Redfern Railway Station Group – 5012154	Great Southern and Western Railway, Redfern	200m north west	Redfern Railway Station Group is significant at a state level as a major suburban station which played an important role in the development of the surrounding residential and industrial suburbs.
Redfern Estate Heritage Conservation Area – 2421496	Redfern	Bounded by Cleveland Street, Elizabeth Street, Phillip Street, Cope Street and Regent Street.	The development of the estate from the 1840s - 1890s reflects the establishment of the Railway at Redfern.

6.1.11.2. Potential Impacts

Weir Phillips Heritage find the proposed works will have an acceptable impact on the significance of the St Luke's Church for the following reasons:

- The proposed works will have no impact on the fabric of the item or the lot boundary curtilage.
- The area is currently undergoing significant redevelopment and gentrification, with a mix of land uses, building typologies and housing stock. The proposed development is consistent with the transition of development within the locality and will not result in any unacceptable visual impacts.
- The proposed design is sympathetic to St Luke's Church and incorporates a 2-storey podium to provide a transition between the two developments. The proposed setbacks will allow the spire and street frontage of St Luke's Presbyterian Church to retain a level of prominence. The proposed slender tower form selected with architectural modulation and high-quality materials.
- The podium level is broken into multiple sections by vertical fin elements, which responds to the fine grain quality of the historic Victorian and Federation era streetscape that formed the original setting of St Luke's Presbyterian Church.
- The proposed development will not block any historically significant view corridors to or from St Luke's Presbyterian Church, as the presently exposed northern wall along the Margaret Street boundary was originally obscured by neighbouring nineteenth century terraces.
- The proposed tower will be visible above/behind intervening buildings in the wider setting of other nearby Heritage Items including Terrace House Including Interior, Eveleigh Railway Workshops, and Redfern Railway Station Group, as well as Redfern Estate Heritage Conservation Area and/or in view corridors to/from them.

Weir Phillips conclude the proposed development will have an acceptable impact on the ability to understand the former St Luke's Presbyterian Church as an example of a Victorian Gothic Church which makes an important contribution to the streetscape and township of Redfern.

6.1.12. Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (**ACHAR**) was prepared by Artefact Heritage to assess the Aboriginal cultural heritage values across the site (**Appendix V**). A summary of the assessment and recommended mitigation measures is provided below.

6.1.12.1. Existing Environment

Based on recent archaeological studies near the vicinity of the study area and predictive models, this area is not located within a landscape that could be considered to have been preferable for Aboriginal occupation. The study area is not close to water sources and its mid-slope position would not be suitable for occupation.

The study area is located within dense residential, commercial and industrial centres. From 1967, the study area was used as a service station. In 2001, the property was refurbished and renovated. works carried out at that time included replacement of the existing underground petroleum storage system (UPSS), remediation of contaminated soils and refurbishment of the northern shop building. The site functioned as a service station from 1967 until it was vacated in 2020.

6.1.12.2. Potential Impacts

A field survey inspection identified that the entirety of the study area is covered by a variety of urban materials including concrete resulting in no visibility across the study area. The disturbance is particularly associated with the service station and underground fuel tanks. These works required deep underground excavations which significantly impacted on any potential archaeological deposits present within the study area. No sites or areas containing potential archaeological material were identified within the study area.

As a result of extensive deep ground disturbance within the study area, it is unlikely for archaeological material to be present. Therefore, the proposed development and associated works are unlikely to impact on any archaeological material within the study area.

The significance values provided in the Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (the Burra Charter) are considered best practice heritage management guidelines in Australia. Artefact Heritage have made the following assessment against the Burra Charter significance values:

- **Aesthetic significance:** The site is within an area that has undergone significant stages of urban development and as a result, the pre-European environment has largely been lost. The site has low aesthetic significance values.
- **Historic significance:** The study area is not known to have any historic associations with Aboriginal people. The site has low historic significance.
- **Scientific significance:** High levels of disturbance have been identified within the study area, most recently associated with the former service station which would have required deep underground ground disturbance. The site has low scientific significance.
- **Social and spiritual significance:** The consultation requirements specify that the social or cultural value of place can only be identified through consultation with Aboriginal people. Based on Artefact Heritage's assessment, the study area is considered to have low social and spiritual significant values.

Aboriginal community consultation was conducted in accordance with OEH Consultation Requirements. Correspondence was sent to organisations requesting details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects. Eleven Aboriginal stakeholders registered an interest in the project.

All registered Aboriginal stakeholders were provided with information outlining the proposed works, including information relating to proposed impacts as well as the project's methodology on 19 March 2021. The following comments were received:

- Karina Slater from Ngambaa Cultural Connections responded on 24 March 2021 to confirm to have received project information.
- Phillip Boney from Wailwan Aboriginal Group responded on 24 March 2021 to confirm to have received project information.
- Clive Freeman responded on 24 Mach 2021 thanking for the project information sent.

On 16 June 2021 a draft copy of this report was sent to all registered stakeholders. On 5 July 2021, a reply was received from Kadibulla Khan of the Kamilaroi-Yankuntjatjara Working Group. The contents of the email and the response sent on 26 July 2021 by Pauline Ramesy (Austral) are outlined in the table below.

Table 26 Responses for Stage 4 Consultation

Kamilaroi-Yankuntjatjara Working Group	Austral
"…Interpretation plans is there a plan in place?, ways you can incorporate culture in interpretation is through native gardens, art work, design, digital display, yarning circles and or an app are some examples. It is unfortunate that the site was once a service station although when you say that "this area is not located within a landscape that could be considered to have been preferable for Aboriginal occupation" Aboriginal people utilised all of the land in its form even if it was not near a water source they would find water some way, by digging or wells and claypans. Our recommendation is we would like to push for monitoring of the sites as last chance to uncover any remaining material done by an Aboriginal RAP."	"…I have reviewed your recommendations and have addressed two out of the three requests within the report. 1. I have added that signage be placed to acknowledge the traditional custodians of the land on which the development is being built. 2. I have also amended this sentence to say: " Based on recent archaeological studies near the vicinity of the study area and existing predictive models, this area is considered to have low archaeological potential to contain evidence of past Aboriginal occupation", to specify that this conclusion is based on scientific analysis rather than a cultural one. Unfortunately, I am unable to recommend further monitoring of this site, as the previous impacts to it are substantial. The construction of the gas station would have impacted the ground heavily as well as the installation of the subterranean tanks. The potential for finding Aboriginal relics is therefore very improbable and would most likely prove to be an unsafe exercise, as there is a possibility of chemicals being present.

Consultation with these groups revealed the importance of acknowledging the changing and continuing relationship to Redfern for Aboriginal people.

6.1.12.3. Mitigation Measures

The report recommendations include the following recommended mitigation measures:

- No further assessment or works are required to be undertaken for the study area.
- If unexpected finds occur, all works in the vicinity must cease immediately. The find must be left in place and protected from further harm. If, human skeletal remains are encountered, all work must cease immediately and NSW Police must be contacted, they will then notify the Coroner's Office. Following this, if the remains are believed to be of Aboriginal origin, then the Aboriginal stakeholders and Heritage NSW must be notified.
- A copy of this report should be forwarded to all Aboriginal stakeholder groups who have registered an interest in the project.
- Interpretive signage has been recommended by the local Aboriginal community to indicate traditional ownership and previous use of the land by Indigenous populations.

Overall, it is considered the site is suitable for the proposed development subject to the adoption and implementation of the above mitigation measures.

6.1.13. Flooding

WMA Water were engaged to prepare a Flood Impact Assessment Report (**Appendix EE**) which considers the flood risk and sets out the stormwater management works associated with the proposed development. A summary of the assessment and recommended mitigation measures is provided below.

6.1.13.1. Existing Environment

The site is located on the upper parts of the Alexandra Canal catchment. Runoff flows in a generally southern direction and to Alexandra Canal and then Botany Bay. The site will potentially be affected by runoff from Regent Street to the east, William Lane to the west and Margaret Street to the south.

The Alexandra Canal catchment has been subject to several previous flood studies by the City of Sydney Council, including:

- Alexandra Canal Catchment Flood Study – Report Final, Project W4785 prepared by Cardno
- Alexandra Canal Floodplain Risk Management Study and Plan, Project W4948 prepared by Cardno

The Alexandra Canal Catchment Flood Study Model Update – ARR2019 Hydrology (prepared for the City of Sydney by WMAwater in September 2020) is the most current date Flood Study for the Alexandra Canal catchment and was adopted in the Flooding Assessment.

The Alexandra Canal Catchment Flood Study Model Update – ARR2019 Hydrology results indicate the site is not inundated during the major storm event 100 years ARI. However, there is a flooding issue at the southern part of William Lane arising from an elevated courtyard on a downstream property which is 700mm higher than the street level of William Lane.

6.1.13.2. Potential Impacts

WMA Water established an existing and design case topographies for the site which were then modelled using the TUFLOW hydraulic model established in the 2020 WMAwater report. The design flood levels to be adopted for the relevant flood planning levels were obtained. A comparison between the peak levels for the 1% Annual Exceedance Probability (**AEP**) and Probable Maximum Flood (**PMF**) events for existing and design cases will indicate whether the proposed works will increase flood levels on adjoining properties.

WMA Water determine sea level rise will have no impact on flood levels at this site as the land is sufficiently high (at 24m AHD) above sea level. An indicative climate change increase in rainfall may be 10%. If the rainfall increase does not raise the 1% AEP rainfalls to above the PMF, the site will still not be affected by floodwaters from upstream.

6.1.13.3. Mitigation Measures

The proposed minimum flood planning levels will be adopted to comply with City of Sydney requirements for 500mm freeboard of the habitable areas and 300mm freeboard for garage and above floodwater for non-habitable areas.

Overall, the report concludes the site is in a flood safe area and is suitable for the proposed development subject to the adoption and implementation of the above mitigation measure.

6.1.14. Stormwater Drainage and Water Quality

JHA Consulting Engineers have prepared a Stormwater Management Report (**Appendix T**) which sets out the stormwater management works. A summary of the assessment and recommended mitigation measures is provided below.

6.1.14.1. Existing Environment

JHA Consulting assessed the existing stormwater assets in Margaret Street using the site survey provided by LTS Lockley. A 300mm diameter Council stormwater line runs parallel to the western boundary of the site. A Sydney Water sewer also intersects the site. Both the stormwater and sewer main are in the process of being diverted and realigned to run parallel to the eastern boundary but within the 13-23 Gibbons Street site.

6.1.14.2. Potential Impacts

The Stormwater Management Report assesses the proposed Water Sensitive Urban Design (**WSUD**) features in accordance with the MUSIC software. Both the stormwater quantity and stormwater quality treatment measures are identified within the report and as summarised below.

- **Stormwater Quantity**: the report reviews the adequacy of the proposed 22m³ on-site stormwater detention (**OSD**) tank in accordance with Sydney Water requirements. The 167mm diameter orifice in the OSD tank will allow stormwater to flow out in a controlled manner without exceeding the Permissible Site Discharge (PSD) of 50 litres/second. The discharge from the OSD will be conveyed to the existing kerb inlet pit at Margaret Street.

  In the event of downstream blockage, the stormwater Pit A-2 (shown in Appendix G of the Stormwater Management Plan) will act as a surcharge point to allow discharge from the orifice to surcharge to flow overland Margaret Street. In the event of a blockage to the orifice within the tank, an emergency surcharge grate is proposed outside the building footprint to allow for overflow from the on-site detention tank to discharge to William Lane.

- **Stormwater Quality/ Water Sensitive Urban Design**: A stormwater treatment train has been proposed consisting of: 8 No. 690 Psorb Stormfilter cartridges by Ocean Protect to be located within the on-site detention tank and 2 No. Oceanguard filter baskets by Ocean Protect located within all external surface inlet pits.

  The results of MUSIC model analysis demonstrate the proposed development will meet the stormwater pollution target prescribed by the City of Sydney.

The recommended mitigation measures to provide for the effective operation of the proposed stormwater management system are summarised below.

6.1.14.3. Mitigation Measures

An erosion and sediment control plan has been designed in accordance with principles outlined in the “Blue Book” Managing Urban Stormwater - Soils and Construction by Landcom (2004). The following mitigation measures are recommended:

- The downstream perimeter of the entire site is to be protected with sediment fence.
- All vehicles that enter and exit the site during the construction site shall be washed down.
- All existing grated inlet pits to be retained shall be surrounded by a geotextile mesh and gravel inlet filter.
- The site storage and material handling areas shall be located to provide easy access for vehicle movements.

Subject to implementation of the above matters, it is expected the stormwater quantity and quality impacts of the development will be acceptable.

6.1.15. Public Domain and Public Access

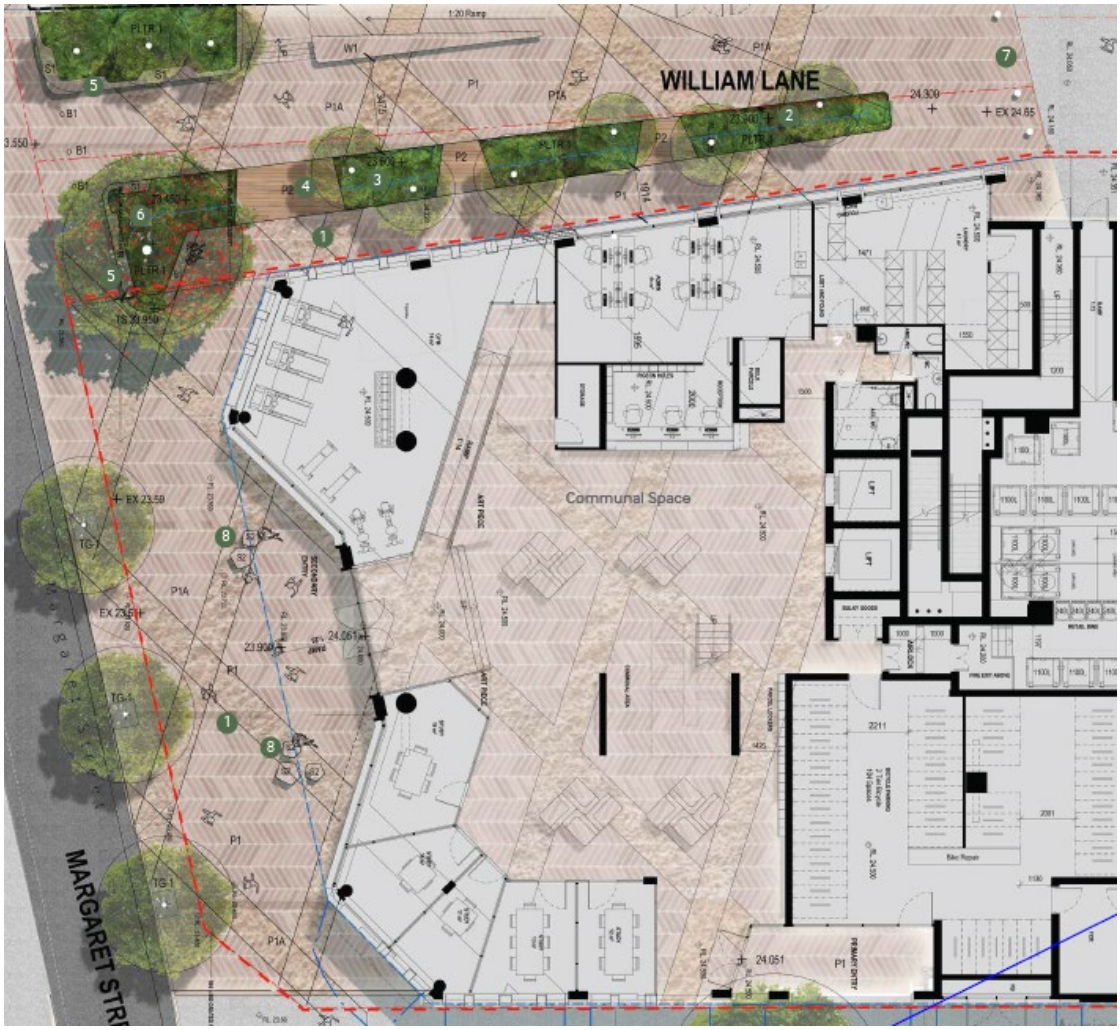
Significant public domain improvements, street activation and pedestrian linkages are proposed. The Architectural Plans prepared by Antoniades Architects (**Appendix G**) and Landscape Plans prepared by RPS Landscape (**Appendix X**) detail the proposed William Lane public laneway. The design of William Lane has been based on Connecting with Country principles as described previously within the EIS.

The Landscape Plans include extensive public domain works along William Lane, including timber bridges for meeting and gathering, a focal meeting tree towards Margaret Steet. A rain garden with educational elements and an interpretative art and fishing tools. The ground floor landscaping treatment is outlined on the figure below.

The proposal includes extensive public domain improvements including provision of a landscaped through-site link connecting William Lane to Margaret Street and associated improvements to the Regent Street and Margaret Street frontages, including awnings and footpath upgrades.

The lane way will be owned by Wee Hur with City of Sydney Council granted an easement over the land for public use. Maintenance of the landscaping will be managed by Wee Hur.

Figure 33 Ground Floor Landscape Plan



Source: RPS Landscape

The proposed public domain has been designed in accordance with the City of Sydney's Public Domain Manual, Sydney Street Codes, Sydney Streets Technical Specifications and drawings and the Inclusive and Accessible Public Domain Policy and guidelines.

6.2. STANDARD ASSESSMENT IMPACTS

This section of the report addresses the matters which require a standard assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

6.2.1. Air Quality

RWDI Australia have prepared an Air Quality Impact Assessment (**AQIA**) which assesses the potential air quality impacts associated with the proposed construction and operational works (.

Assessment

The NSW EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales sets out applicable impact assessment criteria for air pollutants, including:

- Nitrogen dioxide (NO2);
- Particulate matter with aerodynamic diameter less than or equal to 2.5 microns (PM2.5);
- Particulate matter with aerodynamic diameter less than or equal to 10 microns (PM10); and

- Carbon Monoxide (CO).
- The nearby sensitive receivers have been identified as:
- 90- 102 Regent Street
- 11 Gibbons Street
- 13-23 Gibbons Street
- Mixed-use building with residential apartments across Regent Street
- St Luke's Presbyterian church at 118 Regent Street Redfern.

Construction Impacts

The air quality assessment criteria are based on the EPA requirements for assessing impacts from dust generating activities. A qualitative assessment of the potential air quality impacts is provided based on a four-step process, including preliminary screening, assessment of impacts, identification of mitigation measures and consideration of residual impacts after the implementation of the mitigation measures. The assessment finds the following dusk risks.

Table 27 Summary of Dust Risks

Potential Impact	**Risk**			
	Demolition	**Earthworks**	**Construction**	**Trackout**
Dust Soiling	Low Risk	Low Risk	Medium Risk	Low Risk
Human Health	Negligible	Negligible	Low Risk	Low Risk

RWDI Australia conclude it is unlikely that the works would result in unacceptable air quality impacts, subject to the implementation of the mitigation measures outlined in the section below.

Operational Impacts

The proposed design has minimised air quality and odour impacts to the adjoining properties by implementing the following measures:

- The garbage storage room is located towards the centre of the development and enclosed; and
- The common area kitchens, and SOU kitchenette have all been design for localised façade discharges distributing the potential for odour impacts.
- The retail kitchen exhaust has been designed to exhaust through the roof.

Mitigation Measures

The following mitigation management measures are to be considered and, where practicable, included in the Construction Environmental Management Plan (CEMP) for the project:

- **Communications**: develop and implement a stakeholder communications plan that includes community engagement before construction work commences on site. Display the name and contact details of the Responsible Person accountable for air quality and dust issues on the site boundary. Develop and implement a Dust Management Plan (DMP) that considers, as a minimum, the measures identified herein.
- **Site management**: record all dust and air quality complaints, identify cause, take appropriate measures to reduce emissions in a timely manner, and record the measures taken. Make the complaints log available to relevant authorities (Council, EPA, DPIE). Record any exceptional incidents that cause dust and/or air emissions, either on or off site, and the action taken to resolve the situation in the log book.

- **Preparing and maintaining the site**: avoid site runoff of water or mud. Keep site fencing, barriers and scaffolding clean using wet methods. Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If being re-used, keep materials covered.
- **Construction vehicles and sustainable travel**: ensure all vehicles switch off engines when stationary - no idling vehicles.
- **Measures specific to trackout (haulage)**: ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

The assessment concludes the residual effects of dust from the project are expected to be not significant and have a low to medium risk of generating unacceptable air quality impacts.

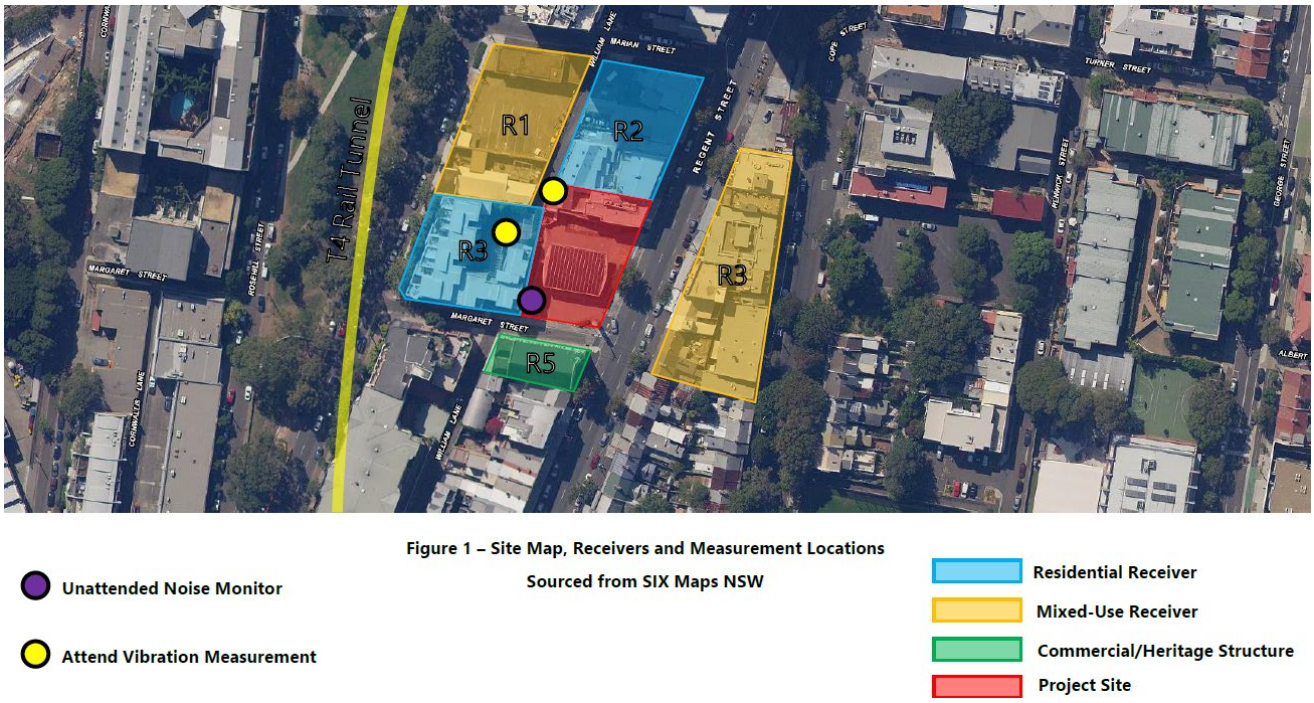
6.2.2. Noise and Vibration

An Acoustic and Vibration Assessment Report has been prepared by Acoustic Logic and is included at **Appendix O**. The report addresses the proposed operational and construction noise impacts associated with the proposed development.

Assessment

The acoustic environment of the site is dominated by traffic noise from Regent Street, Gibbons Street beyond the development to the west and the general 'hum' of the inner-city urban context. The closest sensitive receivers were identified which have potential for noise impacts from the construction or operational phases in the figure below.

Figure 34 Closest Receivers and Measurement Locations



Source: Acoustic Logic

Construction

The proposed excavation and construction activities have been assessed in accordance with the established noise criteria for the sensitive receivers. Consideration was also given to then construction vibration levels which have been established based on potential disturbance to surrounding building occupants and damage to surrounding buildings.

The assessment was based on the typical plant involved in each phase of the construction process, noting the proposed works and activities have not yet been finalised. The relevant noise levels were assessed against the established criteria and found that predicted noise emissions from most activities exceed the

Noise Affected Level criteria and at times, the Highly Noise Affected Criteria will also be exceeded. Mitigation measures have been provided to meet the required noise levels.

Operation

The primary noise sources from the operational development will be the mechanical plant and use of the commercial and retail areas. Detailed acoustic review should be undertaken in the Construction Certificate stage to determine acoustic treatments to control noise emissions from the plant equipment. Acoustic Logic conclude the potential noise emissions from use of the retail areas will be sufficiently managed through management to achieve the relevant noise emissions goals.

Unattended noise monitoring was conducted using an Acoustic Research Laboratories Pty Ltd noise logger. The noise logger was installed on the Margaret Street side of the site in April 2021. The noise logger showed average traffic noise level of 63 dB(A) during the day and 59 dB(A) during the night.

Acoustic Logic has recommended indicative façade treatments to meet the internal noise criteria listed in Table 6 of the Acoustic and Vibration Assessment Report. The recommended glazing construction is summarised in the table below.

Table 28 Recommended Glazing Construction

Façade	Level	Space/ Room Type	Glazing Thickness	Acoustic Seals
East	Levels 2-9	Student accommodation sleeping areas	12.38mm laminated	Yes
	Level 10 and above		10.38mm laminated	Yes
North/ south	Level 2-9		10.38mm laminated	Yes
	Level 10 and above		6.38m laminated	Yes
West	All		6mm float	Yes

Vibration

An assessment of vibration impacts from the operation of the existing T4 rail tunnel beneath the site has been conducted based on the relevant noise criteria and standards. Development located adjacent to railway lines must be assessed in accordance with Clause 87 of the Infrastructure SEPP.

Further, train vibration measures were conducted within William Lane at the rear of the site. The vibration dose values were found to be less than the ‘low probability of adverse comment’ criteria.

Airport Exposure

Acoustic Logic reviewed the Sydney Airport Australian Noise Exposure Forecast (ANEF) 2039 and note that the subject site is outside of the ANEF 20 contour. Therefore, no further assessment of aircraft noise impacts on the proposed development is required.

Mitigation Measures

The following measures are to be addressed within the future Construction Noise and Vibration Management Plan which will be finalised during the detailed design phase and implemented during the excavation and construction of the proposed development:

- Construction of hoarding around the site perimeter to provide noise screening to low level receivers.
- Work vehicles, trailers and concrete trucks should turn off engines when on site.

- Use of silencing devices fitted to exhausts where possible.
- In the event of continuous exceedance of 'highly noise affected level', respite periods should be considered.
- Implement the façade treatments outlined in **Table 28** above.

Overall, it is considered that the potential noise and vibration impacts can be appropriately mitigated and the site is suitable for the proposed development.

6.2.3. Ground Conditions

Douglas Partners were engaged to prepare a Geotechnical Investigation (**Appendix FF**) to assess the geotechnical conditions at the site. A summary of the assessment and recommended mitigation measures are provided below.

Assessment

Douglas Partners used field work and laboratory work to determine the geotechnical conditions at the site. The field work for the investigation included four drilling boreholes at varying depths and installation three of groundwater monitoring wells and laboratory testing of selected samples. Douglas Partners also reviewed published geological mapping and precious studies and investigations on the site and surrounding sites.

The site is located within Quaternary-aged transgressive dunes typically comprising medium to fine-grained sand. The boundary with Triassic-aged Ashfield Shale occurs about 140 m to the west of the site. The site does not lie within an area known for acid sulfate soils. The site also does not occur within an area mapped for known soil salinity issues.

Douglas Partner's assessment concluded:

- Groundwater seepage was observed during auger drilling between 2.5 m and 4 m depth.
- The rock profile includes very low to very high strength rock.
- The exposure classification for buried concrete and steel structures was assessed as being 'nonaggressive' in accordance with Australian Standard AS 2159 − 2009 Piling – Design and installation.
- No free groundwater was measured during auger drilling of the boreholes. Groundwater is expected between RL 16.0-16.5 metres within the more fractured and weathered rock.
- The Sydney Metro rail twin tunnels are below the site, with the tunnel crown at least 34 metres below the ground surface. The Sydney Metro Underground Corridor Protection Technical Guidelines indicate demolition of existing subsurface structures, excavations for basements or footings greater than two metres, ground anchors and shallow or pile footings are allowed subject to an assessment.
- As no basement excavation is proposed, the construction of the building will require minor excavation of the existing fill near the surface.

Douglas Partners recommended a geotechnical impact assessment (possibly including 2D or 3D numerical modelling) of excavation and building foundations, with ground movement and vibration monitoring, and dilapidation surveys of the tunnels to assess and monitor the impact of the proposed development on the underground Metro infrastructure.

The report concludes the additional geotechnical investigation and analysis will further de-risk and manage the geotechnical issues associated with this development and facilitate compliance with the SEARs.

6.2.4. Biodiversity

A request seeking a waiver for the requirement for a Biodiversity Development Assessment Report (**BDAR**) was prepared by Greentape Solutions and submitted to DPIE on 28 March 2021 (refer to **Appendix U**).

A desk-top assessment prepared by Greentape Solutions confirmed the site contains no threatened species habitat or vegetation and the proposal will not require any clearing of native vegetation. The only Environment Protection and Biodiversity Conservation Act 1999 (EPBC) listed species and Matter of National Environmental Significance (MNES) recorded occurring at and near the site is the Grey-headed flying-fox.

This species is nomadic an itinerant and likely feeding on local vegetation within the inner-city green zones. There are no habitat features within the development site suitable for this species. A survey was also undertaken of the site on 23 March 2021 which confirmed there was no evidence of microbats within the buildings.

A BDAR waiver was issued by the NSW DPIE on 22 June 2021 and a BDAR is not required to be prepared and submitted as part of this SSD application (refer to **Appendix U**).

6.2.5. Waste and Servicing

Separate waste management plans (**WMP**) have been prepared by Waste Audit and Consultancy Services for the construction phase and the operational phase of the proposed development (**Appendix L**). The reports identify the estimated waste and management, minimisation and storage requirements which reflect best-practice and promote strong sustainability initiatives.

Assessment

The WMPs include a waste hierarchy of guiding principles, including:

- **Avoid/Reduce** – minimise the production of waste materials in the construction process and purchase materials during site operations which have minimal packaging.
- **Reuse** – ensure, wherever possible, that materials are reused either on site or offsite during the construction and operational phases of the development.
- **Recycle/Recover** – identify all recyclable waste products to be produced on site with clear signage to ensure separation of recyclable waste and process for on-site or off-site recycling.
- **Disposal** – waste products which cannot be reused or recycled will be removed and disposed of at appropriate licensed facilities in accordance with legislative requirements.

The types, quantities and management systems for the anticipated construction waste materials generated for the site are identified in Section 7 of the Construction WMP. It is estimated 248m³ of waste will be generated during the construction phase of which over 90% can be diverted from landfill disposal, for re-use on or off-site or recycled off-site at a specialised facility.

The Operational WMP prepared by Waste Audit identifies the expected resource streams based on the proposed land use activities, including the retail premises on the ground level and the student accommodation comprising 387 rooms. The total waste generated by the development is estimated to be:

- General waste: 15,561 L per week
- Recycling: 15,561 L per week
- Food waste: 15,561 L per week

Further, it is estimated the following waste will be generated from the retail use:

- General waste: 282 L per week
- Mixed recycling: 130L per week
- Food waste: 43L per week

A dual chute system will be implemented for general waste and mixed recycling (paper, cardboard, glass, metal, and plastics). Chutes will be accessed from each level by residents and will terminate in the storage room on the Ground Floor.

All materials will be stored in separate 1100-litre Mobile Garbage Bins, wheeled to 90-102 Regent Street, and collected by private waste contractor from the loading dock. Based on Waste Audit's expected generation and collection frequencies, 18x 1,110L bins will be required for residential waste. This will comprise:

- 4 x 1,100L general waste bins
- 7 x 1,100L mixed recycling bins
- 7 x 1,100L food waste bins.

Based on Waste Audit's expected generation of retail tenancies, 4x 240L bins will be required for the retail use, comprising:

- 2 x 240L general waste bins.
- 1 x 240L mixed recycling
- 1 x 240L of food waste.

The retail tenancy will be required to bring their general waste and recycling directly to the storage area for collection by private contractor twice per week.

Waste Servicing

On collection days, building staff will wheel the bins to the adjoining loading dock at 90-102 Regent Street, from where they will be collected by the development's private waste contractor. Waste collection trucks will access the loading dock area from William Lane, driving forward onto the turntable, which will rotate until the rear of the truck is facing the bin storage room.

Mitigation Measures

- Waste and recycling contractors will be required to comply with the Operational WMP requirements to achieve and maintain best practice.
- Education will be provided for all site users as part of the general building and orientation and on a regular basis.
- Residents will be encouraged to separate food waste in their apartments and bring the material to the Level 2 communal area for depositing into compost bins.
- Comply with the Waste storage requirements in accordance with the City of Sydney's Guidelines for Waste Minimisation in New Developments 2018 (and specific in Section 8.4 of the Operational WMP).
- The waste and recycling contractors are to comply with the following requirements:
  - Reliable and efficient servicing, and meeting all agreed schedules
  - Having collection vehicles fitted with suitable weighing technology
  - Maintaining accurate and comprehensive tracking systems for all materials collected, and current details of processing facilities used
  - Working with the site to improve materials diversion rates
  - Providing detailed monthly and annual reports on diversion and financial outcomes.

Overall, it is concluded the construction and operational phases of the development can be effectively managed to reduce, re-use, recycle and dispose of waste to avoid unacceptable environmental impacts.

6.2.6. Social Impact

A Social Impact Assessment (**SIA**) has been undertaken by Urbis to assess the potential positive and negative social impacts arising from the proposed development **(Appendix U**). The SIA involves a detailed and independent study to scope potential social impacts, identify appropriate mitigation measures and provide recommendations aligned with professional standards and statutory obligations.

Assessment

Urbis prepared a community profile has been developed for the suburb of Redfern, based on Australian Bureau of Statistics data. Key characteristics of the community include:

- High proportion of young adults, living in one person households
- High density, rental living predominant
- Higher proportion of Aboriginal and Torres Strait Islander residents
- Strong population growth.

A range of impacts were assessed against the Social Impact Assessment criteria:

- Noise during operation
- Traffic and parking generation during operation
- Availability of student accommodation
- Supporting student connections and wellbeing
- Creating a safe and activated environment
- Access to social infrastructure and open space
- Cumulative impacts from construction

The five latter social impacts identified above are considered to result in moderate to high impacts and have been assessed further. The table below summarises the potential social impacts associated with the proposed development.

Table 29 Summary of Potential Social Impacts

Description of Impact	**Impacted Groups**	**Overall Impact Rating**
Increased supply and availability of student accommodation in an accessible location.	Students at Sydney universities	High positive
Supporting the creation of community connections for students living in the proposed accommodation to reduce isolation and increase student wellbeing.	Residents of the proposal student accommodation	Medium positive
The CPTED Assessment found the proposal will assist with improving the general safety, security and activation of the site and immediate area. As the site is currently vacant, the redevelopment of the site will provide greater opportunities for natural surveillance along the key road corridors.	Redfern community	High positive
The proposal will introduce a new population of up to 411 students. The proposal seeks to locate these new residents in a highly connected area, being within 2km to six libraries, 15 community facilities and a range of open space areas.	Redfern community	Low to neutral
Incremental and combined impacts arising from construction activities of multiple projects around the site area, including the site itself	Redfern community	Medium- term negative impact

Mitigation Measures

Urbis provided the following recommendations are provided to further manage the potential impacts from the proposal:

- Engage with local tertiary education institutions to communicate with students about the availability of accommodation on site.
- Prepare a schedule of events and programs that will run under the Residents Community Program during the operation of the proposal.

- Consider employing students within the onsite administration team to assist them with fostering social connections and networks.
- Implement the recommendations identified within the CPTED assessment prepared by Elton Consulting. This includes recommendations relating to lighting of all key entry/exits and applicable public domain areas.
- Consider ways to further support the social connections of the incoming community, as recommended by Council. This may include measures such as providing a social enterprise or food incubator within the proposed retail tenancy or providing communal vegetable gardens within the outdoor terrace areas.
- Ensure the Construction Management Plan and Environmental Management Plan are finalised, approved and implemented prior to construction commencing.
- Ensure the community is regularly informed about the expected construction schedule and the construction impacts they are likely to experience. This should also include details of how to contact the nominated contractor with any enquiries or complaints.

Urbis conclude, subject to the implementation of the above mitigation measures, the proposal will have a medium positive impact on future tenants and the existing Redfern community. This positive impact is particularly due to the provision of student accommodation in an accessible location and support for the creation of student connections and wellbeing. The proposal is also likely to contribute to increasing activation and safety of the site and immediate surrounds.

6.2.7. Building Code of Australia Compliance

McKenzie Group have undertaken an assessment of the proposed development against the Deemed-to-Satisfy (**DTS**) provisions of the relevant sections of the Building Code of Australia (**BCA**) and application Building Regulations (**Appendix LL**) and as summarised below.

Assessment

The assessment identifies the matters which deviate from the deemed-to-satisfy provisions of the BCA, including:

- Fire resistance levels: a performance solution will be required if the retail and storage areas are not separated
- the gap between the slab and the external wall will be smoke separated in lieu of being fire separated. Where this is the case a performance solution will be required.
- Public corridors exceed 40m and have not been proposed to be separated by smoke proof construct
- Multiple openings are proposed to be located along the western façade that are within 3m of the fire source feature. Where these openings are not protected in accordance with C3.4 of the BCA, this will be required to be addressed through fire engineered solution.
- Cluster rooms are required to be provided with bounding construction that meets the requirements of Spec C1.1 of the BCA.
- Where a hold open device is not proposed to be incorporated to the retail areas where doors currently swing inwards, a performance solution will be required.
- Due to the scissor stair arrangement in the buildings, the vertical mains pass through the other stair at alternate levels rather than remain in a single fire-isolated stair shaft.
- Fire Control Room departures:
  - Due to the building having multiple entrances the fire control room will not be in sight of the main entrance.
  - A single exit has been shown in lieu of the 2 required in Spec E1.8,
  - Internal wall in the proposed fire control room is less than 2.5m

- Weatherproofing of external walls: a performance solution is to be provided by the façade engineer/registered architect demonstrating that the external walls comply with the requirements of Performance Requirement FP1.4.

Overall, the proposal can comply with the relevant requirements through a combination of deemed-to-satisfy provisions and performance-based solutions, subject to implementation of the recommendations and further reviews during the design development. These matters do not preclude issuing of Construction Certificate as they will be resolved prior to construction.

6.2.8. Aviation

An application to Sydney Airport Corporation Limited was made on 4 August 2021 for the intrusion of the proposed tower into airspace which is prescribed airspace for Sydney Airport (**Appendix NN**).

Assessment

Under regulation 6(1), *'prescribed airspace'* includes *'the airspace above any part of either an Obstacle Limitation Surface (OLS) or Procedures for Air Navigation Services - Aircraft Operations (PANS-OPS) surface for the airport'*.

The Conical Surface of the OLS above this site is at a height of 83 metres above the Australian Height Datum (AHD) and hence prescribed airspace above the site commences at 83 metres AHD. At a maximum height of 87.15 metres AHD, the building will penetrate the OLS by 4.15 metres.

Accordingly, the construction of the building constitutes a *'controlled activity'* under Section 182 of the Airports Act 1996 (the Act).

Conditions

Sydney Airport Corporation Limited approved the controlled activity for the instruction of the proposed building subject to the following conditions.

- The building must not exceed a maximum height of 87.15 metres AHD, including all lift over-runs, vents, chimneys, aerials, antennas, lightning rods, any roof top garden plantings, exhaust flues etc.
- Separate approval must be sought under the Regulations for any equipment (i.e. cranes) required to construct the building. Approval to operate construction equipment (i.e. cranes) be obtained prior to any commitment to construct.
- The Proponent must advise Airservices Australia at least three business days prior to the controlled activity commencing.
- On completion of construction of the building, the Proponent must provide the Sydney Airport Corporation Limited airfield design manager with a written report from a certified surveyor on the finished height of the building.

6.2.9. Development Contributions and Public Benefit

The site is subject to the *Redfern-Waterloo Development Contributions Plan 2006* and the *Redfern-Waterloo Affordable Housing Contributions Plan 2006*.

Development contributions for the Redfern-Waterloo Development Contributions Plan 2006 will be levied at a rate of 2% of the development cost. This equates to a contribution of $1,056,000 based on the capital investment value of $52,800,000 for the proposed development. However, the final contribution will be based on the capital investment value of the approved development, including any changes to the current scheme.

Development contributions for the *Redfern-Waterloo Affordable Housing Contributions Plan 2006* are based on a rate of $86.88 per sqm of GFA. The affordable housing contribution will be determined based on the net additional GFA. This will be calculated based on the GFA within the final approved development, less the GFA of the existing development.

6.2.10. Staging

The proposed development will be constructed in a single stage. Construction is forecast to start July 2022 and be completed by December 2023 for operational start in January 2024.

6.2.11. Infrastructure and Utilities

Rail Infrastructure

GKA Management have assessed the impact of the excavation and construction activities on the Sydney Metro City and Southwest Rail Corridor (**Appendix NN**). The following sections outline the work undertaken and the additional investigations which will be completed during detailed design.

Assessment

An engineering assessment has been undertaken by GKA Management to determine the impact on the metro tunnels due to excavation and construction activities on the site. The works within the development site are predicted to marginally affect the metro tunnels due to the application of building loads.

Wee Hur and the consultant team will continue to consult with Sydney Metro during the assessment of the SSDA and the detailed design process to confirm the proposed development is acceptable, including any mitigation measures required to avoid, minimise or manage potential impacts.

Utility Services

Arcadias prepared an Infrastructure Report (**Appendix S**) that identifies the existing services and infrastructure within the vicinity of the site, establishes the impact on existing utility assets from the proposed development and the proposed augmentation connection required to service the proposal.

Assessment

Arcadis have undertaken the following works:

- Calculated electrical maximum demand, based on the architectural plans and areas schedule.
- Undertaken water flow calculations
- Review DBYD information received from utilities including Sydney water, Ausgrid, Telstra, Optus.
- Reviewed Sydney Water Pressure and Flow statement

The report identifies the existing infrastructure available to the site, including electrical services, communications services, water and sewer services and gas services. Drawings from the relevant service providers are attached to the Infrastructure Report, outlining the location of existing services in relation to the site. The proposed infrastructure requirements to service the proposed development are summarised below.

- **Electrical**: The calculated maximum demand for the development based on VA/sqm allowance is approximately 883kVA. A new 1MVA mini chamber substation is proposed to be installed as part of the development. A formal application requesting “Design Information Package” (DIP) will be made to Ausgrid during the detail design stage.
- **Communications**: The DBYD results indicate there are optic fibre connections in the vicinity of the site. Superloop (internet provider) is currently upgrading their service in the vicinity of the site and as part of these works will provide for a connection to the new building.
- **Water**: The existing 150DICL water main running along Regent Street has insufficient pressure to service the development. Therefore, a Water Services Co-ordinator (WSC) will be engaged to design and project manage the works including a section 73 application to Sydney Water, following lodgement of the SSDA documentation.
- **Sewer**: Based on 80% of the total potable demand being disposed of through the sanitary system it is anticipated that the peak sanitary flow would be approximately 8.4L/s. The sanitary drainage is proposed to be connected into relocated sewer main running through William Lane, provision has been made to accommodate this in the design of the sewer relocation.
- **Gas**: The Ausgrid plans indicate the primary gas main comprises a 75NY 210kPa Jemina gas main which runs along Regent Street. A new lead in gas connection will be provided as part of the proposal.

Mitigation Measures

The proposed infrastructure upgrades outlined above will be implemented in consultation with the respective authorities at the detailed design stage to confirm the supply arrangement and modification. The utility

service providers will consider the cumulative impact of the approved and proposed developments within the locality on future demand and to ensure there is sufficient system capacity for the current proposal, as well as any future developments in the surrounding area.

It is concluded the proposed development can be satisfactorily serviced, subject to the augmentation of existing water supply services and the required connections and on-site facilities to connect to existing utility services infrastructure.

7. JUSTIFICATION OF THE PROJECT

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. PROJECT DESIGN

This SSDA seeks consent for the redevelopment of 104-116 Regent Street, Redfern for an 18 storey mixed use student accommodation building. The development will comprise ground floor retail uses and a 411 bed student housing accommodation with indoor and outdoor communal spaces, 102 bicycle parking spaces and ancillary facilities.

The proposed development will create:

- 9,490m² of student accommodation floor space.
- 72m² of retail floor space
- 220 jobs in construction and 5 jobs in the operational phase.
- $52,800,000 of investment.

Alternatives Considered

Following advice from GANSW during the four SDRP meetings, Antoniades Architects redistributed the gross floor area of the proposal in response to contextual and urban considerations. Specifically:

- The podium has a nil setback to Regent Street which aligns with the approved 90-102 Regent Street podium and other developments further north and a minimum setback of 4.6m along Margaret Street to achieve an appropriate separation from St Luke's Presbyterian Church.
- The tower form has been setback 7.6m from the southern boundary (greater than 4m required) to improve the relationship with St Luke's Presbyterian Church.
- The southern tower steps down in height to improve the transition to the south and reduce potential impacts.

Mitigation Measures

As demonstrated in **Section 6** of this EIS, the proposal is capable of being constructed and delivered subject to the impact mitigation measures defined within **Appendix E**. Generally, key mitigation measures relate to the following impacts:

- Built Form and Visual Impact;
- Ecologically Sustainable Development;
- Stormwater Management and Flooding;
- Waste Management.

Subject to adherence with the mitigation measures listed in **Appendix E**, it is considered that the proposal can be constructed and operated without any undue environmental impact.

7.2. STRATEGIC CONTEXT

The proposal is aligned with the strategic policy objectives as it will contribute to a 30-Minute City and facilitate reduced reliance on private vehicles and increased use of public transport and active transport.

In summary, the proposal aligns with the following relevant strategies and policies:

- **Better Placed:** the proposed built form, height, bulk and scale, setbacks and interface responds to the existing, approved and likely future development within the surrounding locality and the public domain.

- **Greater Sydney Region Plan**: the proposal will increase the supply of housing for students in proximity to major tertiary education campuses. It contributes to the development of a more accessible and walkable city by integrating land uses with public transport and the urban renewal of the Redfern-Waterloo precinct.
- **Eastern City District Plan**: The proposal will contribute to the provision of services and social infrastructure to meet people's changing needs. The proposed development will contribute to the provision of 411 student housing beds with high levels of walkability, good transport connections with proximity to tertiary education.
- **City of Sydney LSPS**: The proposal will provide for communal spaces for residents to interact with landscaping that enhances the streetscape and the appearance of the site. The proposal also includes public domain improvements, including street tree planting, paving and seating to contribute to active frontages along Regent Street, Margaret Street and William Lane.
- **Redfern Centre Urban Design Principles:** the proposal is generally consistent with the built form controls listed in the Urban Design Principles. Where minor non-compliances are proposed, the SSDA is supported by a Clause 16A Variation request (**Appendix Q**).
- **Connecting with Country Draft Framework**: The Statement of Commitment prioritises financial and economic benefits through engagement of Gadigal Elders and Knowledge Holders. The engagement of Indigigrow and Lily Madden as consultants will facilitate consideration of impacts to Country and culture when evaluating economic, environmental, and social benefits and disadvantages of the project.
- **Designing with Country Discussion Paper**: the proposal is consistent with the Designign with Country Framework. Through the ongoing co-design process and engagement of Gadigal Elders, a range of design outcomes have been influenced by Indigenous culture, most notably the weaving pattern replicated in the podium façade and internal wall treatments.

7.3. COMMUNITY VIEWS

Community and stakeholder engagement has been undertaken by Elton Consulting and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with adjoining landowners and occupants and government, agency and utility stakeholders.

The feedback from the community and stakeholder engagement related to the following issues:

- Occupancy rates of international students using the proposed development.
- Overshadowing impacts to neighbouring dwellings.
- Density impacts of significantly intensifying the development on the site.
- Construction impacts of the proposal and surrounding (recently approved) sites.
- Heritage impacts to St Luke's Presbyterian Church.

These comments have been addressed by the project team and the following responses have been provided:

- **Occupancy rates:** As travel restrictions ease, it is expected many students will be returning to Australia for their studies, with fully vaccinated students no longer needing to apply for a travel exemption from 15 December 2021. The Australian Government has also endorsed an International Student Arrival Plan for NSW to facilitate the safe arrivals of students back to the state. There is therefore expected to be a future demand for student accommodation across NSW.
- **Overshadowing:** The proposed development complies with the maximum building height controls and has been sited to provide for satisfactory separation distances between the northern and western neighbouring towers. The Architectural Drawings prepared by Antoniades Architects provide a comprehensive assessment of the potential shadow impacts of the proposed development.
- **Density:** The scale, bulk and size of the proposed development is consistent with the relevant planning controls for the site, including the State Significant Precincts SEPP and the Redfern Urban Design Principles.
- **Construction impacts:** Any construction impacts will be managed by a Construction Management Plan.

- **Heritage impacts to St Luke's Presbyterian Church:** During four State Design Review Panel meetings with the Government Architect NSW – the proposed design changed significantly through the redistribution of GFA in response to contextual and urban considerations.

The Social Impact Assessment prepared by Urbis found the proposal is expected to have a medium positive impact on the community by increasing the supply of student accommodation in an area suitable for new student housing. Further, the proposal includes design and operational features which are likely to support the creation of community connections for students living in the proposed accommodation and the wider community.

7.4. STATUTORY CONTEXT

The relevant State and local environmental planning instruments are listed in **Section 4** and **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- This SSDA pathway has been undertaken in accordance with the SRD SEPP as the proposed development is classified as SSD.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR waiver accordingly (**Appendix U**).
- The proposal satisfactorily addresses relevant provisions under the *State Environmental Planning Policy (State Significant Precincts) 2005* (Appendix 4 Redfern- Waterloo sites) as detailed in **Appendix C**. The proposed development is consistent with the objectives of the Business Zone – Commercial Core zone.
- The proposal generally accords with the relevant provisions of the Sydney DCP 2012 as outlined in **Appendix C**.

7.5. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment**: the proposed development has been designed to comply with the relevant State and local planning requirements and Australian standards and guidelines. The impacts to the natural environment can be mitigated, minimised or managed as summarised in **Section 6** and **Appendix E** and outlined in detail within the specialist reports appended to the EIS. The proposal is located within an established urban context in the inner suburbs of Sydney. The application for the BDAR waiver prepared by Green Tape Solutions demonstrates the proposal will have no impact on threatened species or their habitats (**Appendix U**).
- **Built Environment**: the proposal complies with the land use and built form controls and objectives for the Redfern-Waterloo Precinct. The proposal supports the objectives for character and urban scale in by maintaining the established character and scale of the Regent Street frontage through a new terrace-style podium consistent in scale and architectural language associated with the existing retail tenancies. The proposed public domain improvements include new street trees, paving and seating along William Lane will contribute to the activation of the public spaces and social interaction between the building occupants and the locality.
- **Social**: the proposal will increase the housing options available to tertiary students within walking distance of major educational institutions. The building design is complemented by public domain improvements which contribute to the activation of the public spaces and social interaction between the building occupants and the locality.
- **Economic**: the proposal will create 220 jobs in construction and 5 jobs in operation. The proposal will provide a large investment in infrastructure spending and developer contributions. The proposal will facilitate the orderly and economic development of site in accordance with the relevant planning controls.

It will support the tertiary education sector which makes a significant contribution to the Australian economy and strengthen the connection between Redfern and nearby university campuses.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix E** to this EIS.

7.6. SUITABILITY OF THE SITE

The proposal is consistent with the DPIE and City of Sydney Council policies for the site and surrounding area including the Greater Sydney Region Plan, the Eastern City District Plan and Redfern Centre Urban Design Principles. Further, the proposal is permissible in the 'Zone E − Business − Commercial Core' and is consistent which the objectives of the zone as it will:

- Facilitate the ongoing development of Redfern by providing a high-quality mixed-use building that is compatible and consistent with recent and approved developments in the Redfern Waterloo Authority area.
- Provides employment-generating activities and residential development compatible with the surrounding non-residential uses.
- The site is ideally located for student accommodation as it is within walking distance of many key tertiary institutions including University of Sydney, University of Technology Sydney and Notre Dame University Sydney.
- The proposed development maximises public transport patronage and encourages walking and cycling. 102 bicycle parking spaces has been provided instead of car parking spaces. The site is close to Redfern Railway Station and Redfern and Surry Hills town centres.

The proposal is considered suitable for the site as it delivers a world class student accommodation which aligns with relevant strategic and statutory planning policies and significant NSW Government investment in public infrastructure.

7.7. SUBMISSIONS

It is acknowledged that submissions arising from the public notification of this application will need to be assessed.

7.8. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposed public domain improvements include new street trees, paving and seating along William Lane will contribute to the activation of the public spaces and social interaction between the building occupants and the locality.
- The proposed development will contribute to the ongoing delivery of a diversity of housing within the locality, which includes terrace housing, multi-dwelling housing, low and high-rise apartments and student accommodation. The proposed use of the site for student accommodation is considered entirely appropriate as it will optimise its location within easy walking distance of major tertiary institutions, high-frequency public transport and existing local services.
- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- The proposal provides employment opportunities in the short-term through construction and in the long-term through ongoing operation and retail uses.
- The issues identified during the stakeholder engagement have been addressed through the amended architectural design.

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

DISCLAIMER

This report is dated 17 December 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of The Trust Company (Australia) Limited ATF WH Redfern Trust **(Instructing Party)** for the purpose of Environmental Impact Statement **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

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URBIS

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EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT APPLICATION

104-116 REGENT STREET, REDFERN - STUDENT ACCOMMODATION

Application No	SSD-12618001
Location	104-116 Regent Street, Redfern (Lot 10 in DP 1026349)
Applicant	The Trust Company (Australia) Limited ATF WH Redfern Trust
Council Area	City of Sydney
Consent Authority	Minister for Planning or Independent Planning Commission

Description of proposal

The State Significant Development application seeks approval for a new student accommodation development. The proposal includes:

- construction of an 18-storey student accommodation development including 411 beds (comprising of 331 studio rooms, 25 en-suite rooms, 24 two-bedrooms and 7 accessible rooms), communal spaces, on-site bicycle parking, ancillary facilities and ground floor retail premises
- landscaping and public domain works.

Exhibition Details

The State significant development application, Environmental Impact Statement and accompanying documents will be exhibited from **Tuesday 25 January 2022** until **Monday 21 February 2022** and are accessible electronically on the Department's website (www.planningportal.nsw.gov.au/major-projects/projects/on-exhibition).

At the time of publishing this advertisement, the Minister for Planning has not directed that a public hearing should be held.

Have your say

The Department encourages online submissions, particularly during times when mobility may be impacted by COVID-19 restrictions. To have your say online, search for this project at www.planningportal.nsw.gov.au/major-projects/projects/on-exhibition and click on 'Make a submission'. You will need to log in or create a user account.

If you cannot submit online, post or drop your submission to the address below, to arrive before the close of exhibition. If you want your personal information to be withheld before publication, please clarify this at the top of your cover letter and do not include personal details in your submission.

If you choose to send a paper-based submission, it is important that both the submission and mailing envelope are addressed to the nominated contact team below:

Please be aware that if you choose to send a paper-based submission and it is not addressed to the nominated contact team, the submission will not be received by the Department and will instead be returned to sender.

Please include:

- Your name and address at the top of the letter only (or in a separate cover letter if you want your personal details to be withheld from publication);
- The name of the application and the application number;
- A statement on whether you 'support' or 'object' to the proposal or if you are simply providing comment
- The reasons why you support or object to the proposal; and
- A declaration of any reportable political donations you have made in the last two years (visit www.planning.nsw.gov.au/DonationsandGiftDisclosure or phone 1300 305 695 to find out more).

Privacy statement: Before making your submission, read our Privacy Statement at www.planning.nsw.gov.au/privacy or call 1300 305 695 for a copy. We will publish your submission on our website in accordance with our Privacy Statement.

For more information: Contact Key Sites Assessments Team on 1300 305 695

Address: Planning and Assessment, Department of Planning and Environment, Locked Bag 5022, Parramatta NSW 2124