

Submission

To:	Department of Planning, Heritage and Infrastructure
Date:	Sunday 18 May 2025
Re:	Application SSD-74670005 UNSW G25 Education Building
Exhibition start date	23/04/2025
Exhibition end date	20/05/2025

I object to this proposal based on:

1. The Environmental Impact Assessment using flawed information from a deficient and unrepresentative community engagement process.
2. The negative impacts to me and nearby residents from the G25 building's construction, namely noise, vibrations, traffic and parking impacts.
3. The negative impacts to me and nearby residents from the G25 building's final form and operation, namely loss of sunlight, loss of privacy, and noise, traffic and parking impacts.

I would welcome the opportunity to speak to the project proponent and/or at a hearing about my submission to this development proposal. I am a directly affected resident because my home borders the proposed development site. The proposed building will directly and negatively impact my family during construction and if the building is completed as proposed.

DEFICIENT COMMUNITY ENGAGEMENT

As explained below, the proposal's social impact assessment:

- Has not been prepared in accordance with the Social Impact Assessment Guidelines for State Significant Projects, particularly in relation to using appropriate engagement techniques.
- Is not targeted nor proportionate to the project's context and likely impacts.

Further, in relation to the three listed authors of the Social Impact Assessment:

- One has an **undeclared conflict of interest** in relation to the UNSW G25 Building proposal. At the time assessment was written, she was studying a Graduate Certificate of Social Impact from UNSW Business School, having earlier completed a Bachelors of City Planning at UNSW. This calls into question the impartiality of the Social Impact Assessment.
- Another author completed a Masters degree at UNSW, potentially a perceived conflict of interest.
- None of the three authors appear to have completed the IAP2 Certificate of Engagement. The IPA2 framework (participation spectrum) was referenced as being the basis for the community engagement design.

I believe that the IAP2 framework has been inappropriately used for the UNSW G25 Building proposal. It seems to produce the outcomes desired by UNSW rather than to genuinely seek good data/information on the building's impacts to affected stakeholders (including neighbouring residents).

Specifically, the engagement is designed around 'consulting' with affected residents, whereas (in my view) residents need to be 'involved' – a higher level of engagement. This would produce better outcomes for both UNSW and residents throughout the construction phase and once the building was complete and operating.

However, the engagement design was insufficient to even achieve the lower level of engagement ('inform'). Further, the engagement design was not revisited even when it was evident that the engagement channels had not been effective in the following ways:

- The main source of information from the engagement was a survey. This survey only had 15 respondents (all UNSW staff and students), of whom only one lived in the local area. This means that the Environmental Impact Statement (EIS) has only considered the views of one resident, who may or may not live in a street where homes are physically affected by the proposal.
- The webinar attracted 7 registrations but zero attendees.

There doesn't appear to have been any attempt to understand why the take-up of the survey and webinar were so low, or explain how this affects the conclusions drawn and recommendations made in the EIS.

Even though my home has been identified in the various parts of the EIS as being impacted by the proposal, I did not receive the November 2024 project notification letter that introduced the project to the community for the first time and provided information on joining the webinar. It also meant I did not have opportunity to contribute a survey response.

The first information I saw on the proposal was a letter from the Department of Planning, Housing and Infrastructure that was dated 17 April 2025, but was physically delivered in the week beginning Monday 5 May 2025 when there was only 2 weeks left of the public exhibition period. However, the notice gave address of site as 8 High St, Kensington - which reasonable people assume to mean that the G25 Building would be located on the at-grade UNSW carpark at Gate 8 on High St. I only became aware of the significance and impact of the building when a neighbour alerted me to the actual site location. This meant I had less than a week to review the 1000+pages of technical material in preparing this submission – an impossible task.

Anecdotally, this has been the experience of many of my neighbours, meaning that the community engagement undertaken is insufficient for a development of this scale. It also means that the flawed engagement process produced flawed information and assumptions that have been carried through to other components of the Environmental Impact Statement. As such, I object to the conclusion of the 'Consultation outcomes report' that states:

In accordance with the SEARs requirements for engagement, UNSW has implemented a strategy to inform local residents and businesses, staff and students, Aboriginal stakeholders, and key government agencies about the proposal. This has not only ensured that the community has a clear understanding of the proposal but has also provided an important mechanism to gather feedback before lodgement of the SSDA.

The engagement was poorly designed and ineffective. The Consultation outcomes report states that "UNSW's community and stakeholder engagement approach was:

- **Be timely** – providing the community, authorities and stakeholders with the opportunity to provide important feedback prior to lodgement of the SSDA

- ***Be genuine and constructive*** – *providing transparent and genuine opportunities for people to participate*
- ***Be accessible*** – *ensuring it is easy and straightforward to provide feedback, and providing multiple convenient options to provide that feedback*
- ***Be informative*** – *educating on project elements, benefits and constraints to draw out meaningful feedback.”*

My experience of the engagement in relation to these principles was:

- **Be timely** – I did not receive the November letter that introduced the proposal to the community for the first time. I was not notified of the public exhibition period until there were only 2 weeks remaining.
- **Be genuine and constructive** – my experience of the engagement process did not provide transparent and genuine opportunities for me to participate. The low survey response and webinar attendance, along with only having UNSW staff and students engage should have triggered the consultants to change their engagement design to ensure there was representative feedback from the affected residents.
- **Be accessible** – I couldn’t access the feedback processes because I didn’t receive the November 2024 physical letter.
- **Be informative** – I didn’t receive key information about the development because I didn’t receive the November 2024 physical letter.

I am seeking that the EIS is rejected until UNSW and its consultants:

- undertake community engagement that is aligned with the NSW Social Impact Assessment Guidelines for State Significant Projects and modern community engagement standards, and
- the outcomes of that engagement are reflected appropriately throughout the EIS, including all of the relevant appendices.

The most-affected residents have now formed the Norton St Precinct Community Group and would welcome a constructive and coordinated working relationship with UNSW on the G25 Building for the duration of the development approval, construction and ongoing operations of the building.

Note: Randwick City Council consistently provides high-quality engagement work which is aligned with both the IAP2 framework and community expectations. As a business in the Randwick City Council area, UNSW could consider seeking guidance from the Council on how to effectively engage with most-affected residents and more broadly in the community.

IMPACTS TO RESIDENTS OF THE G25 BUILDING’S CONSTRUCTION, FINAL FORM AND ONGOING OPERATIONS

I object to and disagree with the EIS summary statements in relation to:

- **Improved employment opportunities.** This project will not create meaningful or ongoing jobs. The number of construction jobs modelled for the project could usefully be absorbed into solving NSW’s housing crisis.
- **Temporary disruption during construction:** A 27-month construction period is significant. Describing this as temporary is diminishing the actual impacts to residents who have lived

through and are still living through more than a decade of major construction disruptions in the immediate vicinity (Acute Services Building, Health Translation Hub and the Newmarket developments).

- **Reduction in parking.** The residual impact of 'low' has been assumed without considering the impact to roads in the local area. It also doesn't consider the impact of not providing parking for tradespeople who don't have an option except to drive their equipment to site. Parking is at a premium in the area – hospital workers, UNSW workers and students and construction workers compete all day every day for parking. Residents regularly have their driveways blocked, and drivers regularly park unsafely. Randwick City Council should be able to provide a parking report on the number of infringement notices they issue in the area. This should be ample evidence to require UNSW to provide onsite parking for construction workers.
- **Reduction in solar access.** Again, the summary document diminishes the impact of reduced solar access to residents, marginalising affected residents who have a right to solar access. I would ask that effective community engagement on solar access is undertaken. Yes, there are trees that shade residences on Oval Lane. However the canopy is open, not dense so the shade is dappled and doesn't block the light. The proposed building will be a solid mass that creates blocks of shade. Further, what effect will the loss of sun have on the trees along Oval Lane? Will the cumulative loss of sunlight from the solid building harm them? The cumulative impact of increased shading over the year will negatively impact my use and enjoyment of my backyard. I don't believe the consultants have adequately consulted or presented the full impacts on solar access.

Thank you for considering my submission.