

Date: 19/01/2015

NSW Government – Planning & Environment
Attn: Manager – Key Sites (Cameron Sargent)
GPO BOX 39
Sydney NSW 2001

Dear NSW Planning and Environment,

RE: 60-78 Regent Street, Redfern - Mixed Use Student Housing

Your Ref: SSD 6724

Reference is made to the above mentioned building application ("the proposal") lodged by Iglu Pty Ltd ("Iglu").

I am the owner and occupier of apartment 809/7-9 Gibbons Street, Redfern.

I am writing to you in objection to the proposed development for this site. My reasons for this are:

IMPACT TO CURRENT RESIDENTS AND BUSINESS

1. Inadequate community consultation

JBA, the company handling the proposal on behalf of Iglu, did not engage with the community adequately to ascertain its knowledge and opinions in relation to it.

This is evidenced by:

- JBA stating that it sent out the inadequate amount of 300 "postcards" to surrounding residents and businesses notifying of the single information session in relation to the proposal;
- with the Decitoea building at 157 Redfern Street ("Deicota") and URBA building at 7-9 Gibbons Street ("URBA") having in excess of 120 apartments each, the residents of these two buildings combined would account for more than 80 per cent of the 300 postcards dropped in the area;
- my wife and I lived less than five minute's walk from our current new residence in URBA and did not receive a postcard inviting us to the information session;
- there was no advertising of the information session in local media such as the *South Sydney Herald*;
- only one information session was held despite the population density of the area;
- the information session was held on a Thursday evening not allowing shift workers and those working evenings to attend;
- the information session was held less than two weeks before the majority of residents of URBA moved in, meaning a significant portion of the surrounding population to the proposal was not consulted in any way;

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- only eight people attended the information session despite it being an obviously controversial proposal;
- subsequent information sessions were not scheduled despite the obvious failure to engage the surrounding community; and
- the date of the information session placed it in an extremely busy time of year for families and businesses with its proximity to Christmas and New Year holidays.

With JBA's obvious failure to properly consult the community, the proposal does not contain adequate information as to community's views. With such a controversial proposal, properly consulting the community should have been a high priority for JBA and Iglu, however they have not acted within the spirit of the requirement.

Therefore the community comments as outlined in the EIS prepared by JBA (and detailed in appendix J) should not be seen as a fair representative view of the community.

2. Indigenous culture and heritage ignored

The Redfern area has a strong connection to our nation's Indigenous population with many Indigenous people living in the area.

The proposal does not offer any housing or facilities to assist the Indigenous population of the area.

3. Significant negative impact on the value of surrounding real estate

If the proposal were constructed it would have a significant negative effect on residential and commercial real estate values in the surrounding area.

The reasons for this include that the proposal:

- would violate current planning laws to fit a large building on a very small area;
- would cause huge shadows to fall over the majority of units in Deicota and URBA;
- would present a significant invasion to the privacy of residents in Deicota and URBA;
- would block views of the local surrounds from Deicota and URBA which provide both natural light and aesthetic value to residents in those buildings;
- would place a huge burden on current parking and roads leading to reduced parking available for permanent residents and increased traffic congestion;
- adds minimal commercial facilities to service such an dramatic increase in population;
- would continue to saturate the student housing market in the area;
- would possibly increase alcohol related crime in the area; and
- introduce a transient population synonymous with high-alcohol consumption, loud-noise production outside of regulated hours and minimal community involvement.

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PROBLEMS DUE TO DESIGN, SIZE AND PROXIMITY OF BUILDING

4. The proposal seeks to violate planning laws

The proposed development is completely inappropriate for the site. This is evident by the fact that it requires not one, but two changes to setbacks as set out in current planning controls to make the project viable.

These setbacks are important, with one persevering the character of Redfern via Regent Street and the other preserving privacy and amenity for nearby residents who have purchased apartments expecting to be protected by current planning controls.

The proposal seeks to significantly violate the required distances for a structure of its size from the street and from surrounding buildings according to the NSW Planning and Environment's Residential Flat Design Code ("the Code").

The proposal seeks to set the building back only three metres away from Regent Street in breach of the required eight metres under the Code.

The proposal, more importantly, seeks to build an 18-storey tower less than 14 metres away from Deicota. This is approximately 10 metres less than the minimum 18-metre separation required by the Code between buildings of nine stories or more where habitable rooms and balconies face one another on opposing buildings such as in the proposal.

The Code states:

"Buildings which are too close together also create amenity problems inside the building, for the space between and for neighbouring buildings. These problems include lack of visual and acoustic privacy, loss of daylight access to apartments and to private and shared open spaces."

The objectives of the specified gaps are listed in the Code as:

- "To ensure that new development is scaled to support the desired area character with appropriate massing and spaces between buildings.
- To provide visual and acoustic privacy for existing and new residents.
- To control overshadowing of adjacent properties and private or shared open space.
- To allow for the provision of open space with appropriate size and proportion for recreational activities for building occupants.
- To provide deep soil zones for stormwater management and tree planting, where contextual and site conditions allow.

Given these design laws, it is clear that the site is unsuitable for the proposal because if constructed it would present all the problems to its surrounding area anticipated by the Code and more such as effects on traffic. These are discussed further below.

5. The proposal is not the best use of the site

The site of the proposal is valuable land given its proximity to public transport and the CBD of Sydney.

The proposal (and student housing) is not only inappropriate for the site specifically, but also for the location.

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Developable land in proximity to railway stations in inner Sydney is scarce. Due to the location of the site the vast majority of students will not need to use the train station for daily trips to University.

Also the proposal is a purpose-specific design suited only to student accommodation. The proposal would not be easily retrofitted or adapted for other uses should the business model fail.

Such valuable land so close to the city would be more suited to a residential premises working within the Code. This would provide housing for people and families who would engage in the community and be more able to contribute to the local economy.

A strictly residential use of the site would also see the greatest value to Sydney with residents frequently using Redfern station to commute to work.

6. Shadow impact of the proposal

The shadow impact of the proposal on residents in Deicota and URBA and surrounding businesses would be significant due to the 18-storey height.

In winter, the majority of residents on the eastern sides of Deicota and URBA would have their current natural light blocked by the shadow of the proposal.

This would only be marginally better for the residents of URBA during summer months; Deicota residents would have their natural light blocked all year round.

A building of no more than four stories is far more suited to the size of proposed site considering the surrounding buildings and shadow effect of construction a building any taller.

7. Loss of privacy to surrounding properties

The proposal seeks to significantly invade the privacy of residents in Deicota and URBA.

The design of dorms in the proposal would mean while students study at the immovable desks in their rooms, they would face into the bedrooms and living areas of residents of Deicota and URBA.

At less than 14 metres away from Deicota, this would present a significant invasion of privacy, even more so than that anticipated by the Code, because students would be sitting for long periods of time less than the length of two cars away as they study.

In addition to this, common living areas are also proposed to face bedroom and living areas of Deicota and URBA.

8. Loss of visual aspects to surrounding properties

People living in Deicota would have their aesthetically pleasing views of the Redfern and Surry Hills areas completely replaced with the proposal.

People living in URBA would have up to 60 per cent of their aesthetically pleasing views of the same surroundings blocked by the proposal.

Owner-occupiers, investors and renters of Deicota and URBA have paid premium purchase prices and rents under the impression that Local and State design laws would prevent any such construction ever blocking their views in such a significant way.

To block these views would have a significant impact on investors' capacity to earn rent and on the value of property of both owner-occupiers and investors as discussed earlier.

TRAFFIC AND PARKING PROBLEMS

9. Impact to on-street parking

With no parking facilities in the proposal, residents of it and their guests would have to rely on on-street parking in the surrounding area.

This would place a huge demand on an already scarce resource.

10. Increased motor traffic congestion

The proposal does not assist the community in servicing the large population it seeks to introduce with new roads or improved existing roads.

The proposal does not seek to upgrade or widen surrounding roads or add new roads to service the increased motor traffic congestion it would create.

This may be due to the fact that there is no room to accommodate such traffic improvements, which only continues to suggest that the proposed site is entirely unsuitable for the proposal.

11. No allowance for vehicle access to proposed development

The proposed development allows for no direct vehicle access to its front entry.

It is a significant design flaw that there is nowhere for vehicle to stop, even temporarily.

This places a huge demand on the busy street of Regent Street and surrounding side streets to accommodate stopping traffic. This would further add to the traffic congestion discussed above.

ECONOMIC IMPACT TO REDFERN AREA

12. Minimal and unneeded commercial real estate in proposal

The proposal does not assist the community in servicing the large population it seeks to introduce by adding enough commercial real estate to the area for business to grow and provide services for such a dramatic increase in population within such a small area.

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Unlike Deicota and URBA, which have currently or plan to provide commercial services including an RSL, podiatrist, hair dresser, cafes, restaurants, office space, supermarket and doctor's surgery, the proposal only seeks to add minimal commercial real estate with purposes not needed in the area.

The proposal seeks to dedicate a large portion of its commercial component to a dance studio. The area already has a number of dance studios in close proximity such as Dance Central on Cleveland Street, Latin Dance Australia and Urban Dance Centre on Broadway and Dance Alive Studios on Regent Street.

13. Saturation of student housing market in Redfern and immediate surrounding area

Within the area of Chippendale, Camperdown, Newtown, Central, Haymarket and Ultimo there is an abundance of current, under constructions and proposed student accommodation.

The proposal states there is an inherent need for this type of housing but fails to state how saturated the market is already and what student accommodation is currently under construction much closer to universities.

There is no need for any further student housing given the saturated market in the area which includes:

- Unilodge at 185 Broadway, Ultimo with 586 student accommodation units with housing 686 student beds;
- Central Park Block 4S, under construction, to house 688 student accommodation units;
- Urbanest, 83 Quay Street Haymarket;
- Urbanest, 483 Wattle Street, Ultimo;
- Urbanest, 142 Abercrombie Street, Redfern;
- Urbanest, 150-152 City Road, Darlington, under construction, set to house 456 students;
- Iglu Central, 1 Regent Street Chippendale;
- Current Sydney University on-campus, self-catered accommodation in Camperdown including Darlington House, Selle House, Sydney University Village and Stucco and similar terraced typed housing;
- Proposed Sydney University on-campus, self-catered accommodation at the Queen Mary Building for 802 students;
- Proposed on-campus, self-catered accommodation on Abercrombie Street, Redfern at the old site of The Shepard Centre and Boundary Lane Children's Centre; and
- Current Sydney University on-campus, catered accommodation in Camperdown and Newtown including International House, Mandelbaum House, Sancta Sophia

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College, St Andrew's College, St John's College, St Paul's College, Wesley College and Women's College.

There is a genuine concern that if demand for this type of accommodation wanes in the future (after construction) there is little recourse to allow the proposed development to be utilised in a productive way.

This becomes a greater issue as the site is in a sort after location for residential apartment living due to local amenities and proximity to Redfern train station.

14. The proposal would face high competition at the proposed site

There would be minimal demand for such student accommodation in the location proposed.

Iglu provides high-density student accommodation at approximately \$26 to \$29 per square meter of personal living space (figures do not take into account shared bathroom or kitchen areas and based on \$500 for a 19 square metre studio and \$385 for a 13 square metre dorm room).

Comparatively, a single bedroom apartment in URBA can be provided to students at \$9.33 per square metre (based on \$570 rent per week, \$1200 per annum for electricity and \$720 per annum for NBN internet in a 65 square metre apartment).

In the location it proposes, Iglu would face heavy competition by privately built dwellings as a higher quality of lifestyle is offered at a significantly reduced cost.

In addition to this, it would face competition from the saturated market of current student accommodation discussed above.

SOCIAL IMPACT TO REDFERN AREA

15. Introduction of transient, non-community orientated population

The proposal would introduce a transient population of 370 tertiary students to be housed in a very dense residential format of 134 small student accommodation units.

This population would generally consist of single, 18-24 year-old, low-income students who invest the majority of their time in tertiary study and part-time employment.

As such, their engagement with the community and local businesses would be minimal as the population comes and goes with the cycle of university schedules and completion of degrees.

With youth unemployment in Australia currently at 14 per cent and the proposed cost of living in the student accommodation extremely high, the introduction of this population would add very little to the local economy.

Also, unlike recent developments, such as Deicota and URBA, which have brought many young families to reside in the area, this development would add little to the existing community by way of an engaging population.

16. Increase of drinking age students to the Redfern area

The significant increase of drinking age tertiary students could pose alcohol related crime problems for the area.

Students could pose licensing problems themselves or present as easy targets of crime due to intoxication.

17. Destruction of historic facades on Regent Street

The proposal seeks to demolish current historic shop fronts along Regent Street and replace it with a low cost, modern design shop front.

Historic buildings such as those sought to be demolished bring history and character to the Redfern area. To demolish this and replace them with a design that has placed reduced cost as a priority over aesthetic value would see the Redfern area lose what makes it unique.

18. Profit of Iglu placed above community interests

It is easily inferred from the proposal that Iglu has put its own financial interests ahead of the interests of the community it seeks to enter.

This is evidenced by everything discussed in this objection.

As representatives of the community, the State Government should not approve such a blatantly obvious proposal of self-interest.

Conclusion

For the reasons discussed above, this proposal is not in the interests of the permanent residents in the Redfern area.

With very little research and consideration required, it is obvious the proposal is very controversial due to the significant negative impact it will have on surrounding residents.

If the proposal were approved, its construction would have a permanent negative impact on a far greater population of people than the 370 students it seeks to service. Also, the people it would negatively impact would be permanent residents of the community, while the people it would benefit would be transient to the area.

Permanent residents of the area are voting members of the electorate and as such have a genuine interest in the community and its development as it is to their benefit for the area to grow in a positive way, unlike a student population with no right to vote in local elections.

It is easily inferred from JBA's, and therefore Iglu's, poor attempt to engage the community and the proposal's design that Iglu only has put financial considerations above community and environmental interests.

The NSW State Government should place the interests of its permanent residents over those of a corporation and the relatively small specific transient population it seeks to service.

Based on the above objections as outlined, the current application should be refused.

Regards,



Jason Tozer