

SSD6724 – Mixed Use Student Accommodation Development at 60-78 Regent Street, Redfern

To whom it may concern,

This response prepared by JBA and Iglu overlooks the majority of concerns raised in the 120+ public submissions that were made. The response completely disregards key issues like setbacks from Regent st, privacy and building separations. I find it astounding they are choosing to take such an arrogant stance against valid public and council concerns. There seems to be a large amount of misinformation provided in this responds to submissions. I hope the Department of planning will take the time to vet all the information provided. For example their breakdown of responses is selectively curated to allow them to only respond to the issues they feel they can defeat. As stated above they claim the issue of setbacks from regent st only received 17 submissions as displayed in Table 2. After going through this personally the number is much closer to 33. (submissions mentioning 8m setback 8, 57, 64, 67, 86, 89, 98, 102, 103, 106, 118, 119, 120 and submissions destruction of regent st frontage in reference to the set backs - 4, 5, 6, 9, 17, 32, 36, 40, 43, 45, 47, 58, 68, 70, 72, 80, 82, 92, 93, 94)

The following pages responds to specific points made in their response to submissions. Red indicates extracts from [2015-03-18 Response to Submissions_ Iglu Student Accommodation Redfern.pdf](#)

Step 1 – What are the views that would be affected?

The first step is the assessment of views to be affected. Water views are valued more highly than land views. Iconic views (e.g. of the Opera House, the Harbour Bridge or North Head) are valued more highly than views without icons. Whole views are valued more highly than partial views, e.g. a water view in which the interface between land and water is visible is more valuable than one in which it is obscured.

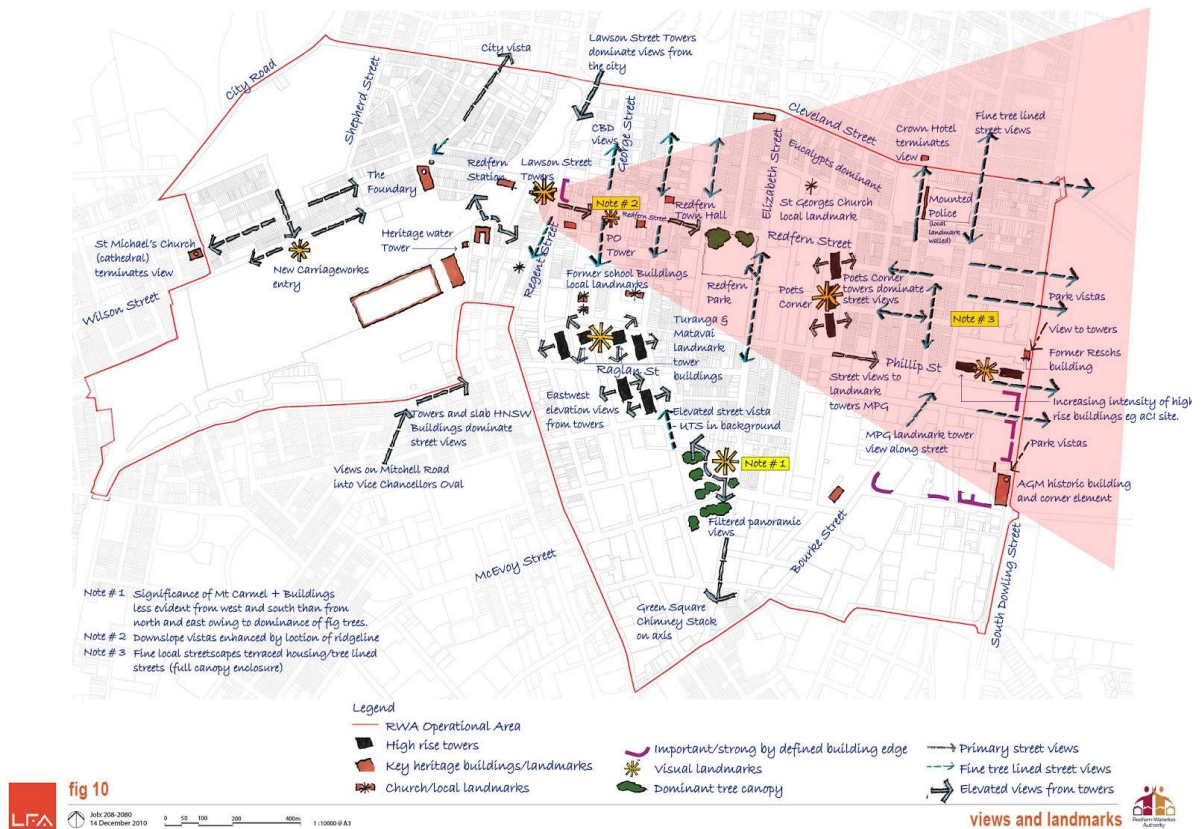
The views to be affected are district views over the Waterloo area. The most prominent features in these views are residential towers in the Waterloo area. These are not iconic views or water views. This is confirmed by the fact that the Draft Urban Design Guidelines mention only northern and southern views as being worthy of protection via view sharing. The extent of views gained from the affected apartments in the Redfern RSL and Gibbons St buildings are also substantially limited by the use of solid balustrades that eliminate up to half of the potential view from these dwellings.

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This has a few key issues. As was evident in the original submission and throughout these responses, JBA and Iglu show utter contempt for the realities of the 157 Redfern St site. By saying all views are limited by the use of solid balustrades indicates they have not even bothered to accurately assess the building. This attached picture shows that in fact solid balustrades make up less than 30% of all balconies. So I see no basis in the claim that is a major concern.



Secondly, the Redfern-Waterloo authority seems to put much more value in the easterly view aspect then JBA. As you can see by the red overlay, the eastern aspect encompass many visual landmarks, heritage significant sites and primary street views.

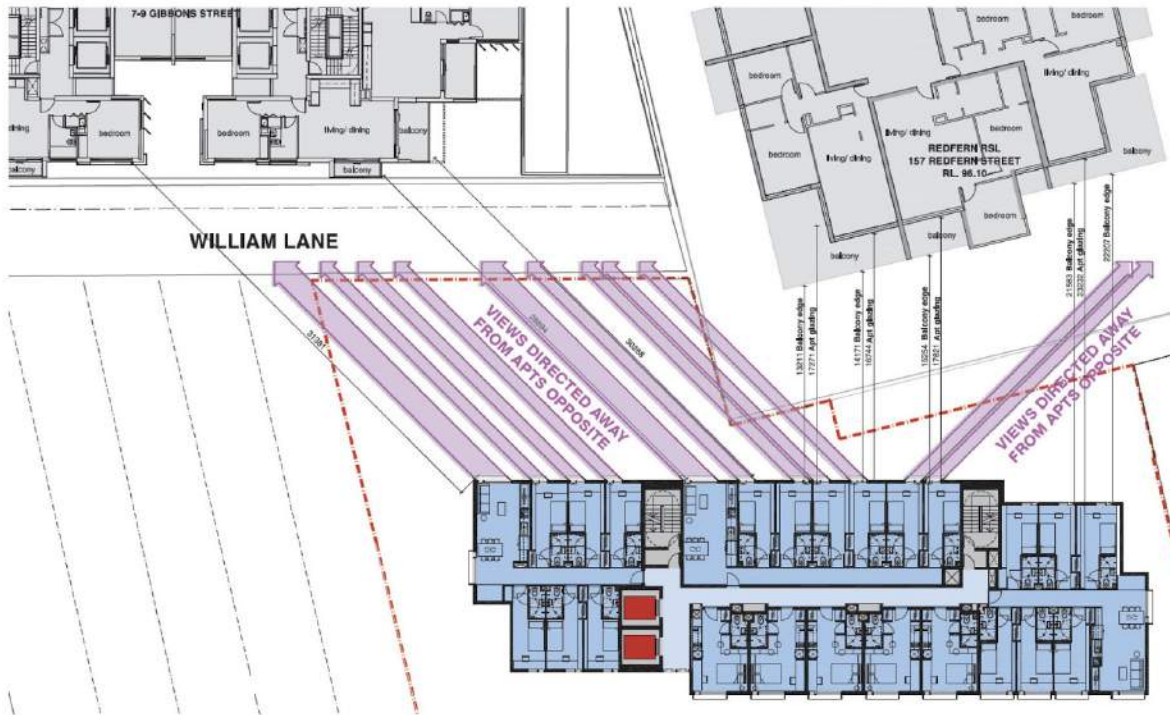


(please see last page for high res attachment)

The proposed 18 storey building form proposed in this SSDA complies with the same planning controls that facilitated the development of the buildings on the Redfern RSL site and at 7-9 Gibbons Street. **There is no reasonable expectation for dwellings at 157 Redfern St and 7-9 Gibbons St to enjoy eastern views across the Iglu site, any more than there could be a reasonable expectation for the proposed Iglu building to enjoy western views across those sites.** The fact that the existing buildings were developed prior to the Iglu site does not give dwellings in these buildings any greater claim to the affected views.

This is probably one of the most concerning aspects of the response. This proposal does not comply with planning controls. It violates the 8m setback, minimum building separations and maximum height restrictions within the 2 story setback area. Of course these existing sites have greater claim to these outlook and basic rights to privacy. If this development was always planned then this statement might hold some truth. Disregarding existing dwellings which relied on planning controls to be upheld in order to protect basic livability. A 4-5 story development could easily be built across the site and cause none of these issues. The department must also consider future proposed development sites. The passing of this application would set an uncomfortable precedent for future sites, allowing both URBA and the 157 Redfern st site to be completely encased by walls of building due to the earmarking of the site to the south for development and the selling off of the terraces currently occupying that area.

Privacy:



The only solution to the most major issue, privacy, is woefully inadequate. Adding a 30cm angled extension to the window will do nothing to lessen the invasion into neighbouring apartments. This above diagram assumes a person would only ever angle themselves at 45 degree to their window, and apparently be unable to look straight ahead.

Adequacy of Proposed Physical Setback

A number of public submissions raised concern that the physical separation between the existing apartments in the 157 Redfern St and 7-9 Gibbons St buildings. In particular, a number of submissions raised concerns that the proposed development does not comply with the upper-level building separation controls for residential flat buildings under the RFDC.

The RFDC does not apply to student accommodation. The RFDC 'rules of thumb' establish building separation distances based on both privacy and urban form design considerations. **The RFDC 'rules of thumb' propose increased separation distances at higher levels, however, it is considered that the intent of this increased separation is for urban design reasons rather than privacy, given that there is no apparent difference between privacy needs of dwellings at lower, middle and upper levels.** At lower levels, the RFDC calls for a physical separation of 12 metres between habitable rooms/balconies, whilst this increases incrementally to a separation distance of 18 metres between 5 and 8 storeys and 24 metres above 9 storeys. The adjoining building provides a consistent boundary setback for all residential levels, with no additional setback for upper levels.

Figure 13 below illustrates the proximity of proposed bedrooms to existing dwellings in the 157 Redfern Street building, which demonstrates that the following minimum separation distances provided throughout the height of the building:

- Apartment 1:
 - Minimum 13.21m to balcony edge
 - Minimum 16.74m to living area

Attempting to Skirt the RFDC guidelines is highly concerning. The above justifications seem to rest on the fact they shouldn't need to give higher stories extra separation. Regardless of their belief either way the consistent setback does not provide what is needed. The claim that apartment 1 is 13.21m from balcony edge and 16.74m from living areas completely overlooks the 8m setback which the development is ignoring. With these upheld this iglu development would place students just 5.21m from the balcony and 8.74 from living areas. It is clear with desperation they are trying to sandwich this oversized building in a plot size inadequate for its needs.

Conclusion:

This is a small sample of the issues with this application and specifically the response to public objections. There have been multiple failures in this application process, the dubious timing in which it was submitted, the complete lack of community consultation and the lack of design options resulting in an eye sore of grey wall and windows. I hope the department

seriously takes into account these many issues and I hope a community meeting will be held to further discuss these issues.

