



# Fire & Life Safety Management

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30<sup>th</sup> June 2020

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Dear Minister & Council Planners,

**Re: Pitt Street South Over-Station Development  
Stage 2 Detailed Design and Construction**

I am, along with my wife and 2 children am a resident of Princeton Apartments for the past 12 years and would like to submit my strong opposition to the obvious over development of the metro station site next to our building.

This is an objection to the proposed development above and I can state that I have not made any donations to any political party.

There are several reasons for this objection – outlined below and ask that you refuse this application.

The development of a “For Rental” only Property

Firstly – I understand this will be a building “for rental” only. This is truly a disastrous idea. The city is full of apartments who are suffering from systemic and constant overcrowding. This rental only proposition will be an open invitation for students, travelers and those people who make it their business to “rent and sub-lease for profit” to fill these apartments with 6 bunk beds in each room, bedding in lounge rooms and even laundries and pile residents in on top of each other so that they have cheap accommodation. This is an extremely pressing issue which gives rise to a great number of problems and breaches of fire safety and other ordinances

Having served for many years on the Princeton EC, we have had to deal with this issue firsthand. Through constant work, we barely manage keep this problem in check, but only after being forced to put in place extremely firm measures and in fact, cannot even use our own intercom in order to and prevent the flood of students and travelers overcrowding. It is **ONLY the vigilance of Owner Occupiers** who keep these buildings in check and prevent rampant abuse of the property. If this proposal for a rental only property was allowed – the situation would be intolerable for the building, neighbors, and council/fire authorities.

## General Planning

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**Re: Pitt Street South Over-Station Development  
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The Department of Planning, Industry and Environment imposed requirements on the detailed design application to comply with the approved concept plan and maximise opportunities to protect the residential amenity of neighbors and Hyde Park. These obligations have not been fulfilled.

**Impacts on Neighbors**

Impacts on units in the Princeton Apartments are devastating. The proportion of apartments that would receive two hours of sun between 9am and 3pm during midwinter would drop dramatically from 46.6 per cent to 5.2 per cent. This is in breach of the Apartment Design Guide standards.

The guide standards limit solar access loss where less than 70 per cent of apartments currently receive the minimum two hours of mid-winter sun to reductions of no more than 20 per cent because of a new development. The guide also requires a minimum 24-metre separation between habitable rooms for developments over 25 metres to protect amenity including visual and acoustic privacy, natural ventilation, sunlight and daylight access and outlook. The proposed separation is less than half of this. Proposed louvres along the southern façade of the building fail to resolve privacy concerns for Princeton Apartment residents because the louvres do not extend across the living room windows of the southern elevation of the proposed tower. This is in breach of the Apartment Design Guide section on visual privacy (3F-1).

The breaches to the Apartment Design Guide also demonstrate that the detailed design proposed utterly fails to comply with conditions of consent: B3 and A24, which require the development to maximise winter sun and amenity of the Princeton Apartments. The application should be rejected on these grounds alone. Further - views of St Mary's Cathedral from Century Tower would be eliminated despite requirements to consider opportunities to retain these views. No attempt has been made to comply with this condition which is a breach of consent conditions A24.

**Environmentally Sustainable Development**

Many homes in the proposed development will have substandard environmental standards and need to heavily rely on artificial lighting and heating. The proposed building fails to comply with the Apartment Design Guide's requirement that at least 70 per cent of new homes have more than two hours of mid-winter sun between 9am and 3pm in the living room, with around only 50 per cent achieving this standard. Furthermore, the development would exceed the guide's limit of no greater than 15 per cent of apartments receiving no solar access during mid-winter.

The devastating overshadowing of and insufficient setbacks with the Princeton Apartments caused by this development will significantly cut the environmental performance of Princeton Apartments, resulting in the proposed development having a massive detrimental impact on environmental sustainability. The proposed development will force many homes in the Princeton Apartments to use artificial lighting, heating in winter and due to lost ventilation, air-conditioning in the summer. These outcomes make any claims about ecological sustainable development ridiculous. The proposed development fails to achieve requirements to demonstrate ecological sustainable development or achieve national best practice sustainable building principles for improving environmental performance including energy efficient design.

**Hyde Park Impairment and overshadowing**

The development application failed to take the opportunity to prevent new overshadowing of Hyde Park in mid-winter. Hyde Park provides very rare inner-city open space, which is heavily used by residents, workers, and visitors. This vital open space must meet large number of city residents' needs for open green space and passive recreation. The great majority of these residents live in apartments and have no private open green space.

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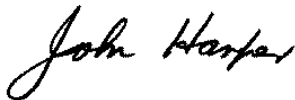
Hyde Park's amenity relies on sun in the colder months and the Hyde Park West Sun Access Plane's aim is to end the progressive shadow creep caused by progressive city developments over several years. Introducing new shadowing of Hyde Park, particularly over the colder months, is in breach of the access plane and unacceptable, and must be rejected.

**Transparency**

The environmental impact statement has conflicting assertions on compliance with the approved concept plan. Some parts state that "the proposed development sits within the approved concept envelope" while others refer to "minor exceedances... outside the approved envelope". It is difficult for the public to understand the full extent of impacts of this application and more information is needed before the community can be expected to provide meaningful comment.

Intelligent and considerate designers can create a building which fits with the community and city living standards AND can comply with the above measures, however this building proposal has taken the cheap, and thoughtless route. I urge you to require that this building takes into consideration and abides with the ALL the requirements.

Yours faithfully



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