

Mr Sam Haddad Director General NSW Department of Planning and Infrastructure 23-33 Bridge Street SYDNEY NSW 2000

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CC

Mr Michael Spence Vice Chancellor and Principal Sydney University Quadrangle A14 The University of Sydney NSW 2006 Email: Vice-Chancellor@vcc.usyd.edu.au

CC

Peter McManus – Email: peter.mcmanus@planning.nsw.gov.au Greg Robinson Director (CIS) Email: gregrobinson@usyd.edu.au

Dear Director General.

## RE: Failure to Comply with Director General's Environmental Assessment Requirements by the University of Sydney - SSD 13\_6123 Campus Improvement Program 2014-2020 for Camperdown-Darlington Campus

REDWatch has only just sighted your requirements for this project.

The above referenced Director General's Requirements (Reissued 23 October 2013) contain the consultation requirements specified below:

### Consultation:

During the preparation of the EIS, consultation must be undertaken with the relevant Commonwealth Government, State or local authorities, service providers, community groups and affected landowners.

In particular you must consult with:

- City of Sydney;
- University Community Groups (if relevant) and Residential Colleges;
- UrbanGrowth NSW;
- Transport for NSW;
- Roads and Maritime Services;
- NSW Heritage Council;
- Local heritage group/s;
- Local Aboriginal Land Council and relevant stakeholders;
- Local community groups, including but not limited to: REDWatch Redfern Eveleigh Darlington Waterloo Watch and RAIDD Residents Acting In Darlington's Defence.

The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.

Attached please find the Community Consultation section of the abovementioned project's EIS, and Appendix N to which it refers, that should comply with the above requirements.

The key paragraph is as follows:

"The University has been engaging with the local community throughout 2013 on the Darlington Campus Abercrombie Redevelopment Project. This has resulted in meetings with key stakeholders and local community with the University providing regular communication regarding the development of the Business School, the Abercrombie Student Accommodation project and the Darlington Pedestrian and Bicycle Access Strategy. Details of these community stakeholders can be found at Appendix N."

The Vice Chancellor in correspondence to RAIDD on 24 February confirmed "There is no suggestion that these community stakeholders were being consulted about the CIP in this reference." REDWatch received similar confirmation from the University's Project Director responsible for the CIP.

The Community Consultation Issues raised and CIP response shown in the EIS hence does not relate to any consultation regarding the EIS, but are rather a list of issues the University has produced from discussions with residents attending meetings related to the separately approved Abercrombie Precinct Redevelopment Project. Only discussions about the Darlington Pedestrian and Bicycle Access Strategy, a PAC condition, related to a broader area but specifically excluded some matters which were to be covered in the CIP.

Sydney University has not consulted with REDWatch during the preparation of the EIS as required. REDWatch has repeatedly urged the University to engage the community in the preparation of such proposals. Late last year at one of the meetings the University has referenced in its EIS, REDWatch requested that the University call a meeting to present its Campus Improvement Program and discuss it with the community before it was put on exhibition. The University did not do this.

Furthermore there is no indication in the EIS that the University consulted with any of the other non-government stakeholder's referred to in your requirements, such as local heritage groups and the Local Aboriginal Land Council. Only Government and Authority feedback is reported and some other non-government groups only have names provided as was the case for REDWatch and RAIDD neither of which was consulted.

It is disappointing that the University worked with statutory agencies but failed to work in a seminal fashion with REDWatch and other groups named in the DGRs.

It is disappointing that your Department did not identify the University's non-compliance with the DGRs at the time of its pre-exhibition checks. At that point the University should have been asked to address the non-compliance.

The opportunity for the community and local stakeholders to provide input during the formulation of proposals is far more effective than merely commenting on them after they have been prepared and signed off by the organisation. This is not only because change is more difficult to affect later in the process, but the proponent gains the trust and benefit of local knowledge.

The community, through community groups like REDWatch and RAIDD, have been not only denied the opportunity to participate in the EIS preparation but also denied the early information about the project that would have allowed broader community discussion and a more considered community response and engagement in line with the Government's aspirations of community engagement early in the strategic planning process.

REDWatch also lost the opportunity to respond during the formal exhibition to how the University incorporated initial community input into the EIS. Under the current circumstances this could only be addressed by REDWatch being granted the opportunity to comment on the University's response to submissions.

The University's non-compliance has also meant that REDWatch has not been able to prepare a detailed submission for the Department prior to the end of the statutory exhibition.

For statutory purposes we request that this letter be taken as an objection for purposes of any decision to refer the assessment to the Planning Assessment Commission.

REDWatch, RAIDD and others have been busy requesting an extension for the exhibition. This would not have been such an issue had the University earlier consulted with resident groups. Only on 27 February were we advised that University would make special arrangements to consult the community until 31 March and to cover the issues raised by the community in the University's response on submissions to the department – see Vice Chancellor's letter also attached of 28 February.

While we welcome the further opportunity for the community to comment on the EIS, REDWatch is concerned that the statutory exhibition itself has not been extended and that the community is dependent on Sydney University to relay community representations regarding itself to the Department.

This approach is not satisfactory as the University's role is conflicted and submissions to the University would not be assessed by the Department in determining if the assessment was passed to the Planning Assessment Commission.

The current proposal also does not allow resident groups to comment to the Department about how the University has dealt with their initial concerns as would have been the case if the University had followed the DGRs.

REDWatch is seeking corrective action from the Department. Such corrective action should demonstrate that the Department takes compliance with its DGRs regarding community consultation seriously.

Such corrective action should provide a remedy to ensure REDWatch, RAIDD and any other community groups have similar opportunities to participate in the statutory planning process to those they would have had if the Sydney University had complied with the DGRs for the preparation of the EIS.

It is not sufficient to just have further discussions with the proponent outside the statutory process.

Yours sincerely

Geoffrey Turnbull REDWatch Spokesperson c/- PO Box 1567 Strawberry Hills NSW 2012

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REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area historically covered by the Redfern Waterloo Authority). REDWatch monitors government activities and seeks to ensure community involvement in all decisions made about the area. More details can be found at <a href="https://www.redwatch.org.au">www.redwatch.org.au</a>.

The University acknowledges and supports the NSW State Government's commitment to strategic stakeholder participation.

A key aspect of the preparation of the CIP has been the consultation and engagement process involving the University community and broader stakeholders including State and Local Government and local residents. All feedback received through these processes has been reviewed and incorporated into the CIP to balance the University's operational requirements and relevant stakeholder interests. Details on the Inter-Government Agency consultation and the community engagement process are provided below:

#### 10.1 INTER-GOVERNMENT AGENCY CONSULTATION

Between June and August 2013, CIS undertook a program of consulting the CIP program with the Government agencies listed in *Table 10* in order to identify key Government issues and relevant policies:

TABLE 10 - INTER GOVERNMENT AGENCY CONSULTATION ATTENDEES

Department of Planning & Infrastructure (DP&I)	Heritage Office of NSW
City of Sydney Council	UrbanGrowth NSW
Transport for NSW	Housing NSW
Roads and Maritime Services	Ausgrid
Heritage Office of NSW	Housing NSW
UrbanGrowth NSW	Destination NSW

The Government consultation program resulted in the DP&I convening a whole of Government agency workshop with the University to discuss a holistic Government approach and response to CIP. Details of this workshop and outcomes are addressed at *Appendix N*. This consultation program has provided the University with instrumental guidance and direction from Government agencies on their respective policy priorities, and which has guided the structure and contents of the CIP and in this Stage 1 SSDA.

Between August and October 2013, CIS has met regularly with the City of Sydney Council to discuss emerging precinct building envelopes for key areas, in particular the Merewether, City Road and Engineering precincts.

#### 10.2 COMMUNITY ENGAGEMENT

The University has been engaging with the local community throughout 2013 on the Darlington Campus Abercrombie Redevelopment Project. This has resulted in meetings with key stakeholders and local community with the University providing regular communication regarding the development of the Business School, the Abercrombie Student Accommodation project and the Darlington Pedestrian and Bicycle Access Strategy. Details of these community stakeholders can be found at *Appendix N*.

Through this engagement the University has been able to identify the major issues of importance to the community in relation to the operations of the University.

These issues have all been considered and provided for in the development of the CIP through the following inclusions detailed in *Table 11*.

TABLE 11 - COMMUNITY CONSULTATION ISSUES RAISED AND CIP RESPONSE

ISSUE RAISED	CIP RESPONSE
Noise	<ul> <li>Adoption of world class design excellence for all new buildings including acoustic containment.</li> <li>Buffer zones (no social events and provision of acoustic treatments) planned along residential streets that have a public interface with the University campus</li> </ul>
Traffic	<ul> <li>Rationalisation of vehicle entry and parking</li> <li>Encouraging greater integration with public transport modes</li> </ul>
Pedestrian movements	Development of a safe campus wide shared pedestrian and cycle network that also links to surrounding City of Sydney networks
Gateways/Invitation	<ul> <li>Establishing strong and inviting campus gateway entrances and campus identity.</li> <li>Encourage welcoming and community access to and within the campus including facilities (libraries, sports, open space, retail)</li> </ul>
Student Parking	<ul> <li>Peripheral car parking locations</li> <li>Pricing mechanisms not to discourage short stay parking and not to encourage short stay parking diversions to surrounding residential streets.</li> </ul>
Open Space/Green Space	<ul> <li>Includes a Landscape, Planting and Public Art strategy</li> </ul>
Safety and Security	<ul> <li>Security Management Strategy in and on periphery of the campus</li> <li>Adoption of CPTED principles</li> <li>On-site campus security</li> </ul>
Community consultation and engagement	Community Consultation, Engagement and Communications Strategy developed





#### 10.3 PROPOSED CONSULTATION STRATEGY

A Communications and Community Engagement Strategy detailed in *Table 12* has been developed that provides a robust framework for action during the lodgement and development assessment stages to the CIP.

In addition to the Stage 1 SSD public exhibition program that will be implemented by the DP&I, the University intends the following activities will be undertaken to ensure that adequate and appropriate consultation has been undertaken by the University and individuals and organisations that may have an interest in the CIP have an opportunity to express their views.

Consultation will continue as required, and the University will keep the community informed of the progress of the CIP through a range of communication tools including the Vice Chancellor's Column in the South Sydney Herald, the University's website, presentations, meetings and other appropriate mediums.

TABLE 12 - COMMUNICATIONS AND ENGAGEMENT STRATEGY

NEWSLETTERS	Community newsletter dropped in Chippendale, Darlington, Glebe, Camperdown and Newtown
LOCAL NEWSPAPER ADVERTISING	City News, South Sydney Herald and The Sydney Morning Herald informing the community of the CIP and providing an officer contact name for enquiries and advising where to review the CIP and make submissions.
STAKEHOLDER DATABASE	A database of interested individuals and organisations will be established to ensure that these stakeholders are given timely information and advice and adequate notice of any consultation/engagement events
KEY STAKEHOLDER BRIEFINGS	One on one briefing for key stakeholders and Government agencies. Key Stakeholders are listed at <b>Appendix N</b> .
PERSONALISED CORRESPONDENCE	Letters to Federal and State Local Members and any other key stakeholders identified, advising them of the CIP
COMMUNITY INFORMATION SESSIONS	Drop in sessions to be organised over a variety of days and times including weekends and in the evenings and held at a number of accessible venues to provide the opportunity for interested individuals, groups and organisations to review the CIP materials and be able to have their questions answered directly by appropriate personnel.
WEBSITE	A dedicated CIP web page will be created on The University of Sydney website where the CIP and any other relevant advice and documentation will also be made available.  Community organisations such as REDWatch will also be invited to upload the CIP documents on their websites.
CIP VIDEO	The CIP Video will be uploaded on the Website for viewing
3D ANIMATED COMPUTER MODELS	3D Animated computer models of the new builds, where available, will be uploaded on the website. $ \\$
DEDICATED EMAIL ADDRESS AND TELEPHONE CONTACT	A dedicated email address and telephone number will be created to answer any questions and to receive feedback on the proposal
EMAIL UPDATES	Emails will be sent to the database on a regular basis during the public exhibition period to provide advice and to invite comment
FACT SHEET	Fact Sheet overview clearly stating the aims and objectives of the CIP, how the CIP was developed, the consultation process to date and how to make comment on the CIP. The Fact Sheet will appear on the website, be emailed to the data base and hard copies located at distribution points such as libraries, cafes, community centres etc.
FEEDBACK FORM	Feedback form for the community to provide comments efficiently. Will be available in hard copy and electronically.
DISPLAY MATERIALS	Development of display boards outlining the planning and approvals process to enable the CIP.
UOS STAFF NEWS AND STUDENT NEWS	Story and invitation to comment in University's Staff News





# **Government and Authority Consultation Feedback**

Organisation	Comment
City of Sydney Council – Planning and Transport divisions	Planning:
	<ul> <li>Develop a City Road model for heights and envelopes.</li> <li>Integrate with St Michael's approval.</li> </ul>
	Transport:
	<ul> <li>Create shared pedestrian and cycle areas – delineate through line-marking, speed limits and signage. Separate cycle lanes will encourage speed.</li> </ul>
Transport for NSW	CIP needs accompanying 'Access Strategy' incorporating:
	<ul> <li>Transport access to and through campus, mode share targets, benchmarking</li> </ul>
	<ul> <li>Parking strategy – type, location, rationale, pricing</li> </ul>
	<ul> <li>Travel demand strategy (Green travel plan) – reduce private vehicle travel, increase modal spilt to public transport.</li> </ul>
Department of Planning & Infrastructure (strategic)	CIP responds strongly to the State Government Eastern Sydney & Inner West Regional Action Plan in particular:
	<ul> <li>Regional Economic Growth – international education provider</li> </ul>
	Delivering Affordable Housing
	<ul> <li>Liveable &amp; Sustainable Community</li> </ul>
	<ul> <li>University Access Strategy - Efficient Transport modal split</li> </ul>
	■ Promote Cycle links – connect to Sydney Cycle Network
	Improve local access to open space
	<ul> <li>Community use of campus facilities</li> </ul>
	Services/facilities for People with a Disability
	Increasing Productivity - Cut Red Tape
	Opportunity for greater University exposure in next Regional Action Plan.
Department of Planning & Infrastructure (urban assessments)	<ul> <li>Encourages a CIP strategic consultative approach – consistent with intent of review of the Environmental Planning &amp; Assessment Act</li> </ul>
	Importance of future Stage 1 Concept application to demonstrate how student accommodation is integrated with other uses and qualifies as "affordable".

## Whole of Government Authority Workshop Attendees and Feedback

Organisation	Comment
Heritage Office of NSW (servicing the Heritage Council of NSW)	The University of Sydney is considered as one of the most significant heritage sites in Sydney
	<ul> <li>Requested Grounds Conservation CMP review</li> </ul>
	<ul> <li>Support of HIS approach to all proposed precincts and sites for demolition</li> </ul>
	<ul> <li>The spaces between the heritage buildings need to be included in the heritage management.</li> </ul>
	<ul> <li>The potential impacts of new buildings on the Colleges needs to be addressed</li> </ul>
Ausgrid	<ul> <li>University to address power sources to service future precincts</li> </ul>
Planning and Infrastructure	<ul> <li>Acknowledged the CIP will create conditions that support the Metro Strategy and will add capacity of the precinct to provide for Health and Education outcomes</li> </ul>
City of Sydney	<ul> <li>Acknowledged that the CIP is working towards Sustainable Sydney 2030</li> <li>Pedestrian and cycling upgrade works and Cycle routes are being coordinated with the University</li> </ul>
Transport for NSW	Advised that they have provided direction regarding the development of the Access Strategy and advised that they will provide further guidance as the program develops
Roads and Maritime Services	Concurred with Transport for NSW comments.

# **Community Stakeholders**

Organisation	Members
Mandelbaum House	Sharna Kerlander - CEO Naomi Winton - COO David Levy - Chair
The Shepherd Centre	Jim Hungerford – CEO Simone Hodgson – Office Manager
Darlington Public School	Liz Sinnott – Principal Parents & Citizens Association
NSW Department of Education and Communities	Rod Megahey – Director Public Schools NSW – Marrickville Network Sue Shelley – Acting Director Public Schools – Marrickville Network
Residents Acting In Defence of Darlington (RAIDD)	Local Residents Mary Ellen McCue Colin Sharp Fran Crook Jenni Sams Jillian Bartlett Kyra Henderson John Berry Maurice Thibaux Rose Wagstaff
REDWatch	Geoff Turnbull – Spokesperson
Aboriginal Housing Company	Mick Mundine – CEO Lani Tuitavake – General Manager
The Boundary Lane Children's Centre	Sene Gide - Director Susan Jamieson- Chair Board members

# **Key Stakeholders and Government Agencies**

### **University of Sydney**

Faculties and Schools

Professional Service Units

Retail Accord

Student Union

### **Government Agencies**

City of Sydney Council

Heritage Office of NSW

NSW Police Local Area Commands (Redfern, Newtown and Leichardt)

Roads and Maritime Services

Transport for NSW

UrbanGrowth NSW

### **Neighbouring Organisations**

Aboriginal Housing Company

Carriageworks

Darlington Public School

Mandelbaum House

Metropolitan Aboriginal Land Council

Royal Prince Alfred Hospital

### **Local Community Action Groups**

REDWatch

Residents Acting in Defence of Darlington (RAIDD)



**Dr Michael Spence** Vice-Chancellor and Principal

28 February 2014

Mr Geoff Turnbull E: mail@redwatch.org.au

Dear Mr Turnbull

University of Sydney Stage 1 Concept Campus Improvement Program 2014-2020 – Camperdown Darlington Campus – SSD 13\_6123 – Extension of the University of Sydney's Consultation period to 31 March 2014.

The University of Sydney has undertaken further action in response to community requests regarding an extension to the consultation period for the Campus Improvement Program (CIP).

The NSW Department of Planning and Infrastructure (DP&I) had advised the University that the statutory public exhibition period would conclude on 28 February 2014.

The University is, however, prepared to extend our exhibition and consultation period until 31 March 2014 to enable the local community to gain further information and advice on which to base comments on the CIP. This will enable the University to respond to all comments and ideas received during the University's extended exhibition period in addition to the submissions that it has received from the DP&I through the statutory exhibition period. The University has advised the DP&I of our intention to continue to work with the community for this extended period.

To assist community members with understanding the CIP we will be providing three more community information sessions which we would encourage you to take advantage of where you can speak with the CIP team members. These information sessions will be held in the foyer of the Services Building (G12), 22 Codrington Street, Darlington on:

- Wednesday 12 March, 5-7pm
- Wednesday 19 March, 5-7 pm
- Saturday 22 March, 11 am –1 pm

In addition, a printed copy of the proposal and display panels of the major proposals for public viewing will remain in the foyer of the Services Building G12, from Monday-Friday 9am-5pm until 31 March, 2014.

The proposal can also continue to be viewed online by visiting <a href="http://majorprojects.planning.nsw.gov.au/index.pl?action=view\_job&job\_id=6123">http://majorprojects.planning.nsw.gov.au/index.pl?action=view\_job&job\_id=6123</a>

We hope that the three additional information sessions and extended time frame will be of assistance. We look forward to hearing from you.

Yours sincerely

Michael Spence

Vice Chancellor and Principal