

1st September 2014

To:

Development Assessment Systems and Approvals
Planning and Infrastructure
GPO Box 39 Sydney NSW 2001

Peter McManus P&I via email - peter.mcmanus@planning.nsw.gov.au

**Re: Campus Improvement Program (CIP) State Significant
Development (SSD 13 6123) Environmental Impact Statement
Response to Submissions.**

REDWatch welcomes the opportunity to make some brief belated comments on Sydney University's Campus Improvement Program (CIP) Response to Submissions. REDWatch wishes to raise a number of concerns and objections we wish to see the University and the Department of Planning and Environment address.

Process

REDWatch notes under point 9 (page 10) DGRs that the University states that it lodged a test for adequacy of the DGRs with the Department prior to officially lodging the campus improvement plan application. The University also refers to correspondence from the Director-General to REDWatch advising that no provisions exist under part 4.1 of the environmental planning and assessment act requiring environmental impact statement to be reviewed against the DGRs for adequacy.

While REDWatch appreciates that the Department has provided an opportunity for us to comment on the University's response we also wish to ensure that the problems we have experienced are not experienced by others.

To this end REDWatch requests the Department to ensure that future requirements for community consultation set out in DGRs are assessed correctly as part of their test for adequacy. This should also ensure that the documents submitted evidence the consultation required in the preparation of the application.

For example the inclusion of a list of the names from a consultation about one part of the University (that did not include parts of the community that would have an interest in the CIP) in Appendix N along with the promise that they would consult during the formal exhibition should not have been accepted by the department as meeting adequate consultation in the preparation of the program under the DGRs will.

In its original submission REDWatch requested that Sydney University provide written undertakings (or the Department makes in its approval conditions to the CIP) that include conditions requiring Sydney University to consult with residents groups in the preparation of DAs flowing from the CIP. The University neither noted this in its response nor made a response to it and REDWatch requests the department ensure that such a condition is included and that it is made a requirement of the DGRs for the individual DAs.

While the University in its response claims that it should not be treated like a commercial entity, in its approach to consultation it has operated as a commercial entity rather than a body interested in modelling best practice community engagement.

For example on page 37 of the response the University states that the urban design review or elements of have been included in presentations to a list of organisations. REDWatch wishes to note that the University's only presentation to community members and groups related to the grove of trees

in Shepherd Street. There was no opportunity to view or discuss the urban design review in relation to any other parts of the University. The University also took no steps to advise the community either through the vice chancellors column in the South Sydney Herald or through its email list of the opportunity for people to comment on their response to submissions. So while the University's consultation sounds impressive the reality is something different.

In line with the objects of the EPA Act the community have a right to information and REDWatch supports the provision of the DGRs that this is best in the preparation of a proposal rather than just at a statutory exhibition.

Local and state to the Infrastructure

The University and the community both agree that major infrastructure work is necessary at Redfern station and to address student movements from the station to the University. As this is a Campus Improvement Program, involves a substantial increase in floor space and people using the University, and given the University's commitment to encouraging greater use of public infrastructure, it is crucial that the State government prioritise work on this already over-stretched infrastructure.

The CIP is in effect strategic planning for the University and hence in line with government policy it should have a proper assessment of infrastructure requirements and a government response to address infrastructure as is to be the case with strategic planning.

REDWatch requests the Department to initiate through departmental processes, or through the Minister, to initiate an appropriate infrastructure assessment and resource commitment from Government.

In an ideal world the expansion of the University should not be approved until there is a commitment to provide the infrastructure necessary to service the existing and future transport needs of the site. This should include an alternative outlet to address the pedestrian bottleneck in Lawson Street.

Community principles

In its submission REDWatch made a number of suggestions regarding principles that should have informed the CIP. The University's failure to consult in the preparation of the CIP meant that the CIP did not get to consider these community principles from the outset. The University response makes no reference to REDWatch's submission on the community principles and makes no response to them.

Principles proposed included that the University should aim to do no harm to the surrounding community and instead aim to add value to the local community by access to university facilities including open space; that minimising the impact of the University on surrounding residential community should have been a central principle of the CIP; and that future developments including the CIP should seek to address its existing impacts on the surrounding community.

In line with our initial submission we encourage the University to talk with the surrounding community about their interactions with the university and to better reflect this input into their proposals. A world's best practice community engagement process and the early engagement of the community in the preparation of the CIP envisaged by the DGRs would have gone some way towards this process.

As it stands the CIP is a University centric document that does not adequately reflect the aspirations of the surrounding community for a symbiotic relationship with its large neighbour. Even the list of "Benefits to the Community" in point 6 (page 7-8) reflect this University centric approach.

Traffic

The University's response reiterates the findings of the CIP Access Strategy rather than respond to specific issues that have been raised about concerns with the Access Strategy study. In point 15 on page 14, for example the University quotes the CIP as saying "there will be a shift towards Butlin Avenue and Western Avenue to the location of the parking stations. However, the change of traffic flows is minimal in the context of surrounding flows". As the University's located either side of an arterial Road the traffic flows are certainly likely to be minimal in relation to the arterial Road. However the University also abuts Darlington which is likely to be impacted by this shift of traffic but the Access Strategy provides no modelling that can be checked to assess the potential impact of this change.

In our submission REDWatch requested the University consider mechanisms to channel traffic onto the arterial roads from the new parking stations in Darlington rather than through residential streets. REDWatch's concern is that bringing traffic to Darlington will mean that more vehicles will seek to access parking via routes through residential streets. We are unable to assess this possible impact as the information is not detailed in the Access Strategy. The University has not reported this as an issue raised in the consultation nor have they responded to it.

Further the Access Strategy is particularly University focused. Its approach is to limit parking and access to the university grounds and by definition this means that more traffic will be channelled into the surrounding streets. As this externalisation of traffic from the university is a direct consequence of the CIP it is incumbent on the University to substantiate rather than simply assert that there will be minimal impact. REDWatch submits that this has not been adequately demonstrated for the non-arterial roads.

In point 1 (page 5) the University argues that the rationalisation of service delivery brings to a significant number of advantages to the University including reducing the number of vehicles accessing University of Sydney however it fails to recognise that this may have adverse impacts upon residential streets adjoining the University such as Shepherd Street. It also fails to note that currently in the engineering precinct unloading which would previously have happened within the University will now happen in a narrow street, near the main pedestrian entrance where there is not an area suitable for waiting delivery vehicles.

In the case of Shepherd Street for example the externalisation of the Distribution centre and its location at the opposite end of the street to the motor vehicle entrance to the Engineering precinct shows the University's new distribution vehicles now using Shepherd Street to access the Engineering precinct. No assessment can be found as to the impact of this location for the distribution centre on traffic and congestion in the narrow weight limited Shepherd Street. This distribution centre is next to the main pedestrian entrance to the university from Redfern Station.

While the distribution traffic was raised by REDWatch in its submission it has not been noted as an issue in the University's response nor has a response been given. REDWatch also proposed that this service centre should be located within the University at the first entrance from Cleveland Street rather than next to the pedestrian entrance but this issue has not been flagged by the University in its response nor has a response to this suggestion been made.

In its response to submissions (point 1 page 6) the University argues that "further specific and detailed buildings including assessment and mitigation measures for transport, traffic, and access will be subject to future detailed application..." However the CIP is the only place where a cumulative assessment of the traffic impact of the developments the University is undertaking can be made. As a result REDWatch is of the view that this needs to be adequately achieved at this stage rather than be left to individual development assessments.

The University notes there is generally low car ownership rates associated with student accommodation facilities however the Access Strategy (P60) says there will be no provision for parking associated with the up to 4000 student accommodation places on campus. No assessment of the impact of this decision is provided. In fact the page references in the traffic DGRs of the Access Strategy substantiate that the issues have been mentioned but not necessarily investigated in a way that it is possible for the community to understand or substantiate.

Student Housing

In its submission REDWatch raised concerns that the CIP deals with sites one by one but does not provide a section on student housing or any in social impact assessment of how such a large influx of residential students will impact Darlington. In fact the CIP does not even specify precisely where the student housing will be located on the campus. REDWatch requested in its submission that the University needed to provide details of where it proposes student housing to be located at the CIP stage and also assess how the impact of the substantial increase in resident students will be serviced by the University. REDWatch notes that this request was not mentioned in the University's response to submissions nor a response given.

In the absence of this information REDWatch is of the view that DPE should not provide a blanket approval to student accommodation as an acceptable use across the University as the location relative to existing residential areas needs to be a key consideration in any approval.

Making the University more permeable

REDWatch notes the University response (point 43 on page 24) and wishes to point out that while the principal CIP objective is to establish the campus as a visitor destination from the perspective of the surrounding community the University's not necessarily a destination but rather a maze that maybe must be negotiated to be able to access facilities or services on the other side of the University. A more community sensitive approach by the University would take into account these community desire lines.

The increased floor space

REDWatch notes the University's rebuttal regarding a 68% increase in floor space (Point 32 page 20). REDWatch understands that the CIP itself only represents a 38% increase on floor space already approved. As the University's seeking approval for additional floor space above that recently approved, it is appropriate to look at the CIP increased in the broader context of the change in floor space between 2012 and 2020. Most of the recently approved floor space has not yet been delivered and hence the cumulative impact on the surrounding community of the University's expansion is not yet evident.

Since the proposed developments are an addition to recently approved development is REDWatch contends that a rigorous EIS is required to assess the cumulative impact of the 68% increase in floor space between 2012 and 2020 as problems will only become evident when the CIP growth is added onto the top of the impact of earlier individual approved developments that have not had a cumulative assessment.

REDWatch welcomes the reduction of motional GFA by about 7% as a result of the Independent Design Review.

Use of 85% of each envelope

REDWatch notes the definition of building envelope used by the University (point 47 on page 25). In its original application the University indicated that it only proposed to use 85% of the floor space contained in the building envelopes.

REDWatch is concerned about building creep at later stages of the development and is seeking either an enforceable undertaking from the University or a consent condition that hold the University to its 85% undertaking rather than an approval for 100% of the floor space within the application which the University may subsequently use or creep up from.

Heritage

REDWatch remains concerned that significant Heritage items at the university are not listed on state and local registers and that the significance of state heritage assets is left up to the proponent through their selection and direction of consultants not external to the university. This demonstrates a definite conflict of interest that we are not convinced is handled adequately through the CMP.

REDWatch submitted that prior to the CIP exhibition the University should have finalised its Grounds Conservation Management Plan and had it approved by the Heritage Office. We note in point 38 (page 21) that the University has discussed the CMP with the g\Heritage office not that it has been approved by them.

As it stands, in the absence of an approved assessment by the Heritage Office, REDWatch cannot support redevelopment of heritage buildings on the basis of the university's own self-assessment of their heritage significance.

Currently heritage buildings on the Sydney University campus are not independently identified, assessed and protected. This should happen before any proposal to redevelop heritage buildings is approved and this should have been done before exhibition.

An independent study of the heritage of the university should be conducted under the heritage Office with a view to listing of state significant items on the state heritage register. It should be a condition of consent for the CIP that the University pay for but not supervise such an independent assessment. REDWatch submits that the redevelopment of any heritage assets should be dependent on the findings of such an independent assessment.

Specific site concerns

University Regiment

REDWatch notes that University's preference for a gateway on City Road matching the height of Moore College. The regiment site however is immediately opposite a non-university residential area and its impact on this site needs to be mitigated. We do not accept the University's argument this site should be deprived of adequate sunlight in perpetuity by the University's development because some buildings on the residential site opposite are already in shadow from trees and cantilevered balconies within that residential development (point 34 page 20).

Darlington Street

REDWatch accepts that the Darlington terraces play an important role for the University for the provision of student housing. The University needs to understand however that this is still a residential street for some people. Until the University purchases all houses in the street, REDWatch is of the view that this street should be treated as a residential street under the provisions of the City of Sydney and that the development proposed for the backyards should not proceed. REDWatch submits that the Department in determining consent conditions needs to ensure that private residents in the street are not adversely impacted by the University's development. In particular this relates to the proposal to add new student accommodation in the backyard of the terraces. REDWatch submits that until the University has purchased all properties that this Street should be treated as a residential street and that this element of the CIP should not proceed at this time. If the development is allowed to proceed it should be allowed only if it does not adversely impact on the existing amenity of the remaining non University owned properties.

Multidiscipline teaching and research building

This building is near the main pedestrian entrance from Redfern Station, off Shepherd Street, not off City Road as per point 45 (page 24) in the University's response. REDWatch continues to be concerned about the scale of the building in this location as it looks out over residential properties and impacts their privacy. The proposal by the University to include screens to protect the privacy of surrounding residents (point 80 page 33) needs to be required as a consent condition if the scale of this building cannot be reduced to prevent overlooking.

Conclusion

REDWatch is concerned that a number of the issues it raised in its submission have not been acknowledged by the University nor responded to in its response to submissions. We welcome the opportunity to comment on these omissions. REDWatch submits that the issues it has raised should have been considered and requests the department to ensure that these issues are addressed adequately in the approved CIP or through the inclusion of appropriate conditions.

We also urge the Department to ensure its internal processes are now adequate to ensure that DGR requirements for consultation are properly assessed for adequacy prior to exhibition and that the DGR provision in the CIP for consultation in the preparation of proposals be carried forward in the resultant DAs.

We also urge the Department to initiate the necessary steps to ensure that the state infrastructure required to support the increased FSR and student numbers is put in place by the state government.

REDWatch thinks the Department of the opportunity to comment on the University's response to submissions.

REDWatch have not made any political donations.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'Geoffrey Turnbull'.

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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 such as the RWA and seeks to ensure community involvement in all decisions made about the area. More details can be found at www.redwatch.org.au.