

9th March 2016
80-88 Regent St

I strongly object to this development. This is another example of how developers take advantage of the SSD scheme. Developments that would otherwise be subject to City of Sydney planning framework or provide benefit to the community are given a near free pass by the State Department of Planning, a department that cares very little for the needs and lifestyle of existing residents and community members.

There are a host of reasons this development should not go ahead including:

- **The Building Separation between the development and URBA**
- **View loss and solar amenity**
- **Wind Tunnel**
- **Childcare centre drop off/parking:**
- **William Lane access and loading dock**
- **Marion St garbage collection**
- **Construction Hours**

The Building Separation between the development and URBA:

This Development infringes on the 8m Regent St setback yet makes no effort to increase the building separation from URBA. The development wants all the benefits of a wider building while doing nothing to lessen the impact on the surrounding buildings. This building will be less than 11m away from living spaces in the URBA development and dramatically block views and solar access. It also violates the RFDC building separations, that should increase with height, which reduces the impact of towering buildings and also provides increasing levels of privacy. If this development wishes to directly tower over Regent st it should add those gained meters to the back of the development increasing separation from URBA and maintaining surrounding amenity.

View loss, Solar amenity and Privacy:

With the approval of IGLU, views and solar amenity have already been **severely** affected to both the 157 Redfern st 'Deicota' building and the 7-9 Gibbons st 'URBA' building. This development would completely entomb the surrounding apartments, further cutting out solar access well below the minimum 2 hours of direct sunlight to a significant number of apartments.

More importantly a building that close, combined with the approved IGLU development cuts out any ambient solar amenity that exposure to the open sky provides. This increases the need for artificial lighting and negatively impacts the energy efficiency of the apartments, which is at odds with the City of Sydney's objectives. View loss is severe, all eastern views from URBA would be lost and the remaining southern views from 157 Redfern st will be dramatically reduced. I note on the provided visual impact analysis the misleading nature of 'maintained view areas'. The views indicated at the top of the diagrams do not exist as they would be completely blocked by

IGLU, the only way any apartment from 'Deicota' could look anywhere but the now reduced southern view is if they leaned over their balcony. The apartments from URBA would have no NE view at all.

1.4 View and Visual Impact Analysis

In accordance with the SEARs, an analysis of the impacts on the views from 7-9 Gibbons Street and 157 Redfern Street has been undertaken and is illustrated in figure 00 and figure 02.

The proposed development of 80-88 Regent Street is consistent with the 18 storey scale of development that is envisaged for the Redfern-Waterloo Area sites under SEPP (Major Developments) and Built Environment Plan 2006 (BEP). However as the site is currently occupied by a two storey building, the proposal will inevitably impact on views from the neighbouring building at 7-9 Gibbons Street and 157 Redfern Street.

The views that will be impacted are southerly views from 157 Redfern Street as well as easterly and some southerly views from 7-9 Gibbons Street. While an inspection of the available views from apartments within these buildings has not been

undertaken, based on the analysis of the site context it is anticipated that they are principally district views to the eastern suburbs and to the south.

Although apartments at 7-9 Gibbons Street, and 157 Redfern Street are bound to be affected by the proposed development they benefit from greater separation distances, and as a result experience minimal privacy impacts. Moreover the proposal provides a critical mass of density to activate and encourage the development of a vibrant, culturally diverse, multi-use precinct.



Privacy is a major concern for the URBA development. There would be an imposing development only 11m away allowing a clear, intimate view into the private space of existing residents. While an adequate distance away from the 'Deicota' development this building will completely enclose the bulk of apartments on the eastern side. This is not New York or Hong Kong, I don't see the need to encase so many residents within walls of concrete.

Wind Tunnel:

The wind analysis provided is inadequate. The impact on the 'Deicota' Building is likely to be severe. Southerly winds already batter these apartments, the creation of a wind tunnel when both Iglu and this new development are built would create unlivable and dangerous conditions. I ask that a more indepth study be conducted as the Redfern area is currently suffering major wind issues. Especially Redfern st between Gibbons and Regent.

Childcare centre drop off/parking:

While their plans to add a childcare centre to the area are commendable, they have provided almost no drop off parking, proposing only 2 spots instead of the required 8 for a centre of this size. No matter the justification that people would "catch the train" we know this is not a reality for many busy and working parents. This will create a major hazard in the morning and afternoon blocking Marion St/William Ln and potentially parking access to 157 Redfern St. The development needs to provide a better parking plan and more temporary drop off locations that do not impact existing public space.

William Lane access and loading dock:

The building is only providing one undersized loading dock along William Ln that relies on being managed by the building manager. This could create chaos on William Ln and again block access to 157 Redfern St. The opening to William Ln is also quite small as it effectively operates as a one way entry into 157 Redfern St. The dramatic increase in traffic will create a hazard to cars turning into William Ln and no traffic management solutions have been outlined.

Marion St garbage collection:

The new development is providing garbage collection off Marion St. This will mean the loss of a number of short stay, off-street parks along Marion St which act as defacto visitor parking for the surrounding buildings. Also the entering and leaving of large collection trucks having to turn out of the restricted space will create further hazards on an already crowded Marion St which services two large developments currently and shortly a 370 person student accommodation with it's own host of retail loading dock issues. A better solution needs to be proposed.

Construction Hours:

The current proposal has provided a preliminary construction plan. It states a weekday and Saturday start time of 7am. This is at odds with restrictions set out for the approved IGLU development. They should conform to required 7:30am start time and 9am start time for high noise equipment. As this building has a large basement area there will be a large amount of excavation noise. Restrictions applied to the IGLU development:

D1. Hours of Work and Noise

The hours of construction and work on the development must be as follows:

- a) All work, including building/demolition and excavation work, and activities in the vicinity of the site generating noise associated with preparation for the commencement of work (eg. loading and unloading of goods, transferring of tools etc) in connection with the proposed development must only be carried out between the hours of 7.30am and 5.30pm on Mondays to Fridays, inclusive, and 7.30am and 3.30pm on Saturdays, with safety inspections being permitted at 7.00am on work days, and no work must be carried out on Sundays or public holidays.
- b) All work, including demolition, excavation and building work must comply with the *City of Sydney Code of Practice for Construction Hours/Noise 1992* and Australian Standard 2436 - 1981 *Guide to Noise Control on Construction, Maintenance and Demolition Sites*.

Note: The *City of Sydney Code of Practice for Construction Hours/Noise 1992* allows extended working hours subject to the approval of an application in accordance with the Code and under Section 96 of the *Environmental Planning and Assessment Act 1979*.

D2. Use of High Noise Emission Appliances/Plant

- a) The operation of high noise emission appliances, plant and/or machinery such as pile – drivers, rock breakers and hydraulic hammers and those which are not listed in Groups B, C, D, E or F of Schedule 1 of the *City of Sydney Code of Practice for Construction Hours/Noise 1992* and Australian Standard 2436-2010 *Guide to Noise Control on Construction, Maintenance and Demolition Sites* is restricted to the hours of:
 - 9.00am to 12.00pm and 1.00pm to 4.30pm, Mondays to Fridays
 - 9.00am to 1.00pm, Saturdays
 - No work is permitted on Sundays or Public Holidays
- b) All reasonable and feasible steps must be undertaken to ensure that the work, including demolition, excavation and building complies with the *City of Sydney Code of Practice for Construction Hours/Noise 1992* and Australian Standard 2436- 2010 *Guide to Noise Control on Construction, Maintenance and Demolition Sites*.