



11 March 2016

Amy Watson
Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

Dear Ms Watson

RE: Mixed Use Residential and Retail Development at 80-88 Regent Street, Redfern (SSD 7080)

Thank you for the opportunity to provide a submission to the development application and Environmental Impact Statement (EIS) prepared by SJB Architects for the abovementioned site.

UrbanGrowth NSW Development Corporation (UGDC) is the administrator for the Redfern-Waterloo Contributions Plan and the Redfern Waterloo Affordable Housing Contributions Plan and is providing a submission in this context.

We have reviewed the application and EIS and make the following comments.

Redfern-Waterloo Contributions Plan

The EIS indicates (Section 5.3.8) that contributions will be paid in accordance with the *Redfern-Waterloo Contributions Plan 2006*, at a rate of 2% of the total development cost (\$37,738,941 incl. GST). The expected contribution currently equates to \$754,778.82, which would need to be indexed annually until the contribution is paid.

Redfern-Waterloo Affordable Housing Contributions Plan

In accordance with Clause 8 of the *Redfern-Waterloo Authority Affordable Housing Contributions Plan 2006* (Contribution Plan), the current rate for the contribution is \$79.13/m². With a proposed total gross floor area (GFA) of 5,752m², the contribution payable is approximately \$455,155.76. The contribution rate would need to be indexed annually until the contribution is paid.

The Contribution Plan specifies the contribution applies to the total GFA where there is new GFA proposed. The EIS proposes that development contributions under the Contribution Plan should be reduced by the GFA of the existing buildings being demolished (970m²) and should only be imposed for the additional gross floor area (4,782m²) instead of the total GFA (5,752m²).

The Proponent did not provide a reason or justification why the additional GFA should form the basis of the calculation of the contribution. The proposal does not include housing at below market rents and does not offer subsidised rents. In addition to this, Sunni Thirdi Regent St Pty Ltd is not a community housing provider or an organisation approved by the Minister.

The Contribution Plan includes a list of the kinds of development which may be exempted from paying the contribution by the Minister for Planning and the proposed development is not a kind of development listed as one that would receive an exemption.

Given that the Proponent has not provided satisfactory information why the contribution should not apply to the total GFA and the development is not a kind of development which may be exempted from paying a development contribution, UGDC does not support partially waiving the contribution as requested by the Proponent. Providing exemptions in an ad hoc manner which are inconsistent with the Contribution Plan sets an undesired precedent for development in the Redfern-Waterloo Growth Centre.

The UGDC requests that Department of Planning and Environment ensure that conditions for development and affordable housing contributions are included within any development consent which may be issued for this development application.

Please do not hesitate to contact Kate Sheehan on (02) 9391 2912 or ksheehan@urbangrowth.nsw.gov.au should you require further information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Stephen Driscoll".

Stephen Driscoll
General Manager
UrbanGrowth NSW Development Corporation