



**Office of
Environment
& Heritage**

DOC18/788647
SSD 9275

Cameron Sargent
Team Leader – Key Sites Assessments
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ellen Mannix

**Exhibition of Mixed-use student accommodation development at 80-88 Regent Street, Redfern
(SSD 9275)**

Dear Ms Mannix,

I refer to your letter dated 12 October 2018 requesting input from the Office of Environment and Heritage (OEH) on the exhibition of the Mixed-use student accommodation development at 80-88 Regent Street, Redfern (SSD 9275). The proposal involves the demolition of existing structures and construction of an 18-storey building comprising 265 student accommodation beds within 185 units, ground level retail and commercial uses.

OEH has reviewed the relevant documentation and provides comments at Attachment 1.

Should you have any queries regarding this matter, please contact Svetlana Kotevska, Senior Conservation Planning Officer on 8837 6040 or at Svetlana.kotevska@environment.nsw.gov.au.

Yours sincerely

S. Harrison 14/11/18

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Communities and Greater Sydney Division

Attachment 1 – OEH comments on exhibition of Mixed-use student accommodation development at 80-88 Regent Street, Redfern (SSD 9275)

Aboriginal Cultural Heritage

OEH notes that the SEARs issued on 10 May 2018 required at item 9 the preparation of an Aboriginal Cultural Heritage Assessment Report (ACHAR). This has not been submitted with the EIS and was not available during the public exhibition period. The EIS states that an ACHAR will be submitted prior to the proposals' determination though it claims the due diligence report process found no further investigation necessary in accordance with OEH guidelines. It states "the Proponent has commenced the preparation of an ACHAR report based upon feedback provided by OEH and the NSW Department of Planning and Environment in relation to this project. The ACHAR will be provided to the Department prior to the finalisation of the planning assessment process."

The archaeological assessment submitted with the EIS states in the Executive Summary "It is noted that no basement levels are proposed, and excavation will be limited to piling to support the building" and further it states that "The proposal will involve the complete redevelopment of the subject site, and will therefore result in substantial sub-surface disturbance. If present, archaeological remains will be completely destroyed and/or removed by the current proposal." The geotechnical report recommends drilling of bore holes to a depth of 14m to clarify ground conditions. These works alone in addition to the pilings are likely to impact Aboriginal deposits if present.

OEH will review the ACHAR once it has been submitted.

Water Sensitive Urban Design (WSUD)

The proposal significantly increases the percentage of impervious surface coverage on site. In order to reduce runoff and improve the water quality discharged from the site, a variety of WSUD measures need to be implemented. OEH has reviewed the Stormwater Drainage and Water Quality Report prepared by Taylor Thomson Whitting Pty Ltd dated August 2018. The water quality treatment measures proposed as part of the development need to be conditioned on any forthcoming consent as follows:

- Installation of a Rainwater tank and use of the system for irrigation reuse
- Installation of a OSD tank
- Stormwater 360's StormFilter treatment system incorporated within the OSD tank system to provide tertiary stormwater treatment. This water quality control measure uses media-filled cartridges to remove pollutants from stormwater runoff including total suspended solids, hydrocarbon, nutrients and other common pollutants.
- Implementation of an Erosion and Sediment Control Plan
- A maintenance plan for the above must be prepared and implemented.

Sustainability and Building Design

OEH recommends the development incorporate green walls (see example below), and where possible a more intensively planted green roof and/or a cool roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the *OEH (2015) Urban Green Cover in NSW Technical Guidelines* which can be found at the following link:

<http://climatechange.environment.nsw.gov.au/Adapting-to-climate-change/Green-Cover>.

Green roofs can increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community. The selected plant species as shown on the landscape plan planting schedule and planting palette are mostly exotic and invasive weeds. OEH encourages their replacement with native species. A good opportunity exists to increase the long term sustainability outcomes of the proposal, given the rooftop terrace, level 01 internal courtyard proposed (as shown below) through intensive green roofs/walls etc. Additional green cover on site will assist with reducing the urban heat island effect, local temperatures and contribute to meeting Greater Sydney's urban tree canopy target of 40 per cent consistent with the District Plan's Planning Priority.

OEH also recommends that the NSW and ACT Governments Regional Climate Modelling (NARCLIM) climate change projections developed for the Sydney Metropolitan area are used to inform the

building design and asset life of the project. These include over 100 climate variables, including temperature, rainfall, hot days and cold nights, severe Forest Fire Danger Index (FFDI) and are publicly available online and at fine resolution (10km and hourly intervals) for 20-year time periods: 2020–2039 near future and long- term 2060–2079.



Trio Apartments

(Photograph: Courtesy City of Sydney)

Image: Green Wall example



Image: Proposals Landscape perspective plans

(END OF SUBMISSION)

