

To whom it may concern,
I am writing in regards to:

**MP 06_0101 MOD 2 Pemulwuy Project Redfern - Concept Plan Modification, and
SSD 8135 Pemulwuy Project Redfern - New Student Accommodation Building**
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8135

The whole Project and business case should be reviewed because fundamentally, the main justification to address the SEARs requirement appears to be that extra funding is required for the other precincts. As taken from the Aboriginal Housing Company website and Environmental Assessment/Environmental Impact Statement, *"It will breathe new life into the Block, and restore a strong and healthy Indigenous community"* and *"provide a suitable mix of uses that satisfy the needs of the local ATSI community"*; it is not clear there is any justification that a strong and healthy Indigenous community is being restored as there is a significant increase in the volume of students (from 154 to 596). This increase without increasing the size of the other precincts further confirms this would be an unsuitable 'mix of uses to satisfy the needs of the local ATSI community'.

Secretary's Environmental Assessment Requirements

- There is no information on setbacks of the proposed development.
- It does not accurately outline how it would successfully relate to the built form of existing character.
- The Consultation Plan is dated 26 June 2017, however mentions that it commences in January 2017. This is inaccurate and puzzling. It appears to have been retrospective which is inappropriate for such a report. For the significance of this project and given its past, there does not appear to be much detail or consideration for the ATSI consultation.

Social Impact Statement

"The Block is considered a modern sacred site by Aboriginal people across the nation. The site is historically the first urban land rights in Australia; the birth place of Australia's civil rights movement; and continues to symbolise the struggle for Aboriginal human rights and self-determination. For these reasons and many others, the future of the Block will have a profound effect on the psychological and physical wellbeing of Aboriginal communities, around the country". And "breathe new life into the land, and restore a strong and healthy Aboriginal and Torres Strait Islander community to Redfern with an emphasis on cultural values, spirituality and employment"

- 596 students with a 74% mix of international students compared to the 62 dwellings set out for ATSI people does not meet the claim of a suitable mix of ATSI and commercial.

Environmental Assessment/Environmental Impact Statement

Page 2 - Funds were unable to be obtained from these sources and the AHC is required to make the Project self-funding to enable it to proceed.

AND

provide a suitable mix of uses that satisfy the needs of the local ATSI community

The decision and approval of six storeys was provided as it ensured a good balance of commercial and Aboriginal and Torres Strait Islander (ATSI) affordable housing. Simply increasing the number of student beds for commercial purposes disregards the original proposal. There is no increase in this affordable housing, while there is a significant increase to 24 storeys and student numbers. This is an unsuitable mix and will dilute the original purpose of the Pemulwuy development.

Page 2 - satisfy the increased demand for purpose built student housing in this area

There is already student accommodation being built in the area on Regent St. There are more dwellings planned for Waterloo where high-rise buildings are more in line with current planning and design.

Page 2 - it is proposed to modify the development approved in Precinct P3 to significantly increase the student housing to enable the AHC to enter into a commercial arrangement with a student housing provider to fund the construction of the entire Project.

It appears that the commercial implications and risks have not been properly considered and there is no transparency as to how such a significant oversight has resulted in the requirement for this increase. These are

unsatisfactory grounds for such a significant increase in scope of the project when it appears the issue was from lack of planning. The request is not an appropriate solution due to the unsuitable mix being in favour of commercial requirements over ATSI requirements.

Page 31 - This context has informed the placement of the taller mass of the building to the south to cluster with the suite of taller buildings surrounding the Station and the extent and presence of taller buildings anticipated to occur over time under plans such as the UTS, the Metro Strategy and the District Plan

This building is taller in storeys compared to other taller buildings in the area. The blend and smooth transition of height in buildings (from current strategies and plans) is not met due to the other precincts being significantly shorter, as well as the other housing in the area and also other recent unit developments (Hudson St). It does not fit with the Plans and Strategies outlined in this context.

Page 36 - A shadow analysis indicates that the modified building form will not have any undue or unreasonable effect on the level of solar access enjoyed by residents of surrounding residential properties in the vicinity of the site.

It is not clear that this analysis has been undertaken comprehensively.

Page 48 - • reinforcing the significance of Redfern as a meeting place by: • ensuring a mix of community, cultural and recreational facilities for Aboriginal residents and the wider community; • allowing for the establishment of Aboriginal enterprises, businesses and training and support services on this site;

The original proposal was in accordance with this Redfern-Waterloo Built Environment Plan; however the new proposal is not a mix of community, cultural and recreational facilities for Aboriginal residents. It has gone from a significant ATSI presence to an insignificant presence due to the increase numbers of student beds.

Page 56 - The building will be compatible with: the higher-rise contemporary mixed-use development to the east adjacent to Redfern Station and existing character of older-styled residential development to the west; and • the future character of development contemplated by the Metro Strategy and the UTS in this identified urban renewal precinct.

The land which this is being built on is surrounded by older-styled residential. At 24 storeys, it does not blend well with the surrounding existing infrastructure in terms of height and character. It does not blend in height either.

Page 61 - The separation of the building from the contemporary mixed-use buildings on the eastern side of the rail corridor fronting Redfern and Gibbons Streets will mitigate its effects on the city views enjoyed by residents of those buildings.

This is unsubstantiated. There is no apparent evidence that supports this claim. The evidence is not comprehensive and has not taken all of this area into consideration, rather just a single point of view from 'one' of the buildings on these streets. The views from 7-9 Gibbons St as well as 157 Redfern St, will in fact be impacted, particularly at the requested height of 24 storeys, which is significantly higher than those buildings.

Page 61 - The height, bulk and scale of the building will not have any undue or unreasonable effects on the residents and occupiers of surrounding buildings in terms of privacy, solar access, view loss or visual impact.

This is not true and the evidence put forward is limited and not comprehensive. The surrounding buildings will be in short view/distance of this building. Due to its height, it will have direct views into the adjacent buildings impeding on privacy.

There is unclear evidence as to the solar implications and how they will affect natural light to adjacent buildings (obviously those with a Western/North Western facing would have their already limited sunlight potentially limited further during certain months of the year).

The building at 24 storeys will have a significant impact on the (loss of) view and visual impact from adjacent buildings. There does not appear to be comprehensive evidence considering this impact. It appears to only have been taken from some vantage points. It is not clear if this has been considered at the 24 storeys proposal. There will be unreasonable loss of view of the city.

There is some analysis on the reflection of the windows; again it is not clear that this has been comprehensively considered for adjacent buildings, rather roads only. There is potential for there to be a reflection/glare off the windows into the surrounding residential buildings.

Page 66 - The proposal will not have any undue or unreasonable effect on the amenity enjoyed by residents of surrounding properties in terms of overshadowing, loss of privacy, loss of views or visual impact.

As per above, this is unsubstantiated and will have unreasonable effects on the view of the city.