



Ms Amy Watson
Industry and Key Sites
Department of Planning & Environment
320 Pitt Street
SYDNEY NSW 2001

By email: amy.watson@planning.nsw.gov.au

Dear Ms Watson

NOTICE OF EXHIBITION OF SECTION 75W MODIFICATION AND STATE SIGNIFICANT APPLICATION FOR A STUDENT ACCOMMODATION BUILDING, PEMULWUY, 77-123 EVELEIGH ST, REDFERN MP06_0101 MOD 2 & SSD 8135

Thank you for the invitation dated 12 September 2017 for the Heritage Council of NSW to make a submission for the exhibition of a section 75W Modification and State Significant Application for a Student Accommodation Building, Pemulwuy, Nos 77-123 Eveleigh St, Redfern, MP06_0101 Mod 2 & SSD 8135.

The following reports have been reviewed:

- *Heritage Impact Assessment Concept Plan Modification (MP 06_0101 MOD 2) and State Significant Development Application (SSD 8135) Pemulwuy Project, The Block, Redfern. NBRIS Architecture June 2017.*
- *Historical Archaeological Assessment and Aboriginal Cultural Heritage Assessment Advice for 83-123 Eveleigh St, Precinct 3, Pemulwuy, The Block, Redfern. Curio Projects Pty Ltd. 6 June 17.*

The Concept Plan No. 06_0101 for which Secretary's Environmental Assessment Requirements (SEAR's) were sought on 6 December 2016 was for a 3 to 6 storey building with a maximum FSR of 2.9:1. The proposed modification, MOD 2, is for a 3 to 24 storey building with a maximum FSR of 6.95:1.

Nos 77-123 Eveleigh St, Redfern is not listed on the State Heritage Register. However, the proposed development is approximately 50m north of Redfern Railway Station group which is listed on the State Heritage Register (SHR 01234).

The four-fold increase in height being sought under MOD 2 will have a major adverse visual impact on Redfern Station's setting, being sited only 50m away. The proposed 24 storey tower will be an extremely conspicuous and detrimental addition to the station's immediate setting. The disparate scale between the single storey station and 24 storey tower will cause the tower to loom over the station. Also, the proposed tower will be extremely conspicuous in views to and from the front (Lawson Street) entry of the single storey Redfern Station Booking Office and in views of it along Lawson St. I acknowledge that there are four existing towers approximately 80m east of the station. However, these towers are not directly in front of the Booking Office's street elevation and are lower than 24 stories.

In addition, the tower's eye-catching combination of tall blade walls, textured finishes, strong colours, gridded fenestration and shafts of curtain glazing will draw excessive attention to itself and make the 24-storey tower appear nearer to the station than it actually is.

Because of the serious adverse impacts of the proposed 24 storey tower on the Redfern Railway Station group (SHR 01234) setting, Modification 2 should not be approved. Instead, the original six storey

concept proposal would be a more sympathetic development and it will not have an adverse impact on the setting of the Redfern Railway Station group (SHR 01234).

The Historical Archaeological Assessment by Curio Project Pty Ltd included with the environmental impact assessment finds that Nos 77-123 Eveleigh St, Redfern does not have the potential to contain historical archaeological relics of local or state significance. The assessment concludes that two conditions should be appended to any approval of the proposal to deal with any unexpected finds. I advise that the historical archaeological assessment is generally fit for purpose and the recommended conditions will satisfactorily deal with any unexpected finds

The Greater Western Sydney Region Team of the Office of Environment and Heritage may provide separate comment on Aboriginal cultural heritage.

If you have any questions regarding the above matter, please contact Ed Beebe, Acting Senior Team Leader – State Heritage Assessments at the Heritage Division, Office of Environment and Heritage on 02 9585 6045 or ed.beebe@environment.nsw.gov.au.

Yours sincerely



Rochelle Johnston
Manager, Conservation
Heritage Division
Office of Environment & Heritage

As Delegate of the Heritage Council of NSW

7 November 2017