

20 August 2019

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Senior Planning Officer – Key Sites (Metro)
Department of Planning, Industry and Environment
320 Pitt Street
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By upload to Planning Portal www.planningportal.nsw.gov.au/major-projects/

Dear Mr Jennejohn

RE: MP11_0093 Pemulwuy Mixed Use Project, Redfern Modification 2 – Design Changes

Thank you for your correspondence dated 8 August 2019 inviting the City to comment on the proposed amendment (Modification 2) to 'Pemulwuy Mixed Use Project – Precinct 1' granted on 21 December 2012 by the Deputy Director-General under delegation of the Minister for Planning (ref MP11 0093).

Modification 2 is accompanied by *"Written statement to support an S.4.55(1A) modification application to vary project approval MP11_0093 for development of the Pemulwuy Project, Redfern"* prepared by City Plan Strategy and Development dated 01/08/19 (ref P-19107) which states that the proposed modifications include:

1. Alterations to the number of adaptable housing proposed at the site (from 57 dwellings to 16 dwellings); and
2. Alterations to the number of car spaces designated as accessible (increase from 10 to 16).

The modifications require changes to Conditions to delete reference to a commitment of 57 dwellings, or 92%, in Precinct 1 to be constructed in accordance with AS4299-1995 – Adaptable Housing. The applicant submits that this initially proposed commitment, detailed in the original Environmental Assessment Report, prepared by Ludvik & Associates dated December 2011, was 'likely an error'.

The City of Sydney **objects to a reduction in the provision of adaptable housing**, and notes that the Director General, in the assessment report from December 2012 for MP11_0093, makes reference to the benefits of the proposal with respect to its provision of adaptable housing several times contradictory to the text provided by the applicant in the 'Written statement...' submitted with Modification 2.

The Director General's report does highlight that all the units in the residential apartment building will be adaptable in relation to an assessment against SEPP 65 Part 03 – Building Design, specifically in relation to 'Apartment Mix' and 'Flexibility'. This aspect of

the development is also mentioned in the assessment against Metropolitan Plan for Sydney 2036 under Part 2.2 Project Need and Justification, and against the Draft Sydney City Subregional Strategy, which requires 'a diverse housing stock, which encompasses affordable and adaptable dwellings, and meets the needs of the community enabling residents to age in place'.

The City of Sydney considers that proposed Modification 2 would detrimentally impact on the community as compared to the original proposal. The City of Sydney is committed to creating an inclusive and accessible city, and aims to ensure that new dwellings cater for the needs of elderly people and people who have a disability. The Pemulwuy project in particular is considered to be a development whereby community and provision of equitable access should be a priority.

Further, the proposed pathway from the accessible car parking spaces to the adaptable units is convoluted and it is difficult to see how this complies with the relevant standards including Australian Standards relevant to accessibility. The plans show that to access Townhouses 16, 15, 12, 11 and 08, a person must exit the building and traverse around to the other side of it via the roadways. The '*Statement of Compliance – access for people with a Disability*' prepared by Accessible Building Solutions and dated 03.06.2019, Page 4, should be queried where it states 'access has been provided from the main pedestrian entry to the entry doors of all SOUs on all levels by means of a lift'. This doesn't seem to be the case.

With regards to the conversion in carparking from 10 to 16 accessible parking bays, the City does not object subject to compliance with relevant Australian Standards.

Should you wish to speak with a Council officer about the above, please contact Amy-Grace Douglas, Specialist Planner, on 9265 9333 or at adouglas@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM
Director

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