

## Comments on “Response to Submissions Report, 90-102 Regent St, 1 March 2021”

These comments are on behalf of the 1 Margaret St Strata Committee.

Please note that the submission made to the EIS was also on behalf of the 1 Margaret St Strata Committee - originally the submission was lodged privately because of issues with the submission deadline but subsequent to committee approval was upgraded via a submission amendment.

We would welcome the opportunity to constructively discuss our concerns with both DPIE and the Proponent.

The following comments refer to the points as identified in Section 4.3 of the Response to Submissions Report.

### **Point 9: Deficient community consultation and inconsistencies with objects and general terms of EP&A Act**

**Proponent Response** *“Elton Consulting has advised the engagement program was informed by their previous community engagement for 13-23 Gibbons Street and their understanding of local community and stakeholders through previous projects in the surrounding area. The programme design is committed to accessible, proactive and transparent engagement with the community and stakeholders.”*

The 13-23 Gibbons St project (SSD 9194) referred to in the Proponent’s Response above, received 18 submissions from the public (with 7 from 1 Margaret St owners plus 2 from Margaret St tenants). All public submissions objected to the project. A total of 17 of these submissions raised concerns about the quantum of student accommodation development in the immediate precinct bounded by Regent, Gibbons, Redfern & Margaret St (measuring ~200m x 70m). The cumulative existing, proposed and planned projects would result in approximately 2,000 student beds in this limited area. Genuine concerns have been raised over the impact on cohesion, resident community, integration, pressure on infrastructure, volume of numbers and long term viability/suitability of this student influx in such a concentrated manner.

The public submissions did not receive any mention in the SSD9194 Response to Submission Report. Despite the Response to Submission Report identifying 21 key issues, the unanimous public concern regarding excessive student accommodation density was not considered of adequate significance for discussion in the report. Issues such as provision of adequate washing machines in the laundry complex received priority in this document. The public concern on student numbers was only discussed in an Appendix to the report with

*“The proposal is consistent with existing planning controls and planning policy which support and encourage the provision of student accommodation / boarding house development.”*

It is difficult to comprehend how this could be considered *“accessible, proactive and transparent engagement”*.

The proponents dismissive response to the public’s issues on SSD9194 was successful in creating a sense of futility in commenting on 90-102 Regent St (SSD10382). Hence an initial decision of the

Margaret St residents to not engage in what appeared to be a pointless consultation process. However, this decision to not comment was reversed in the immediate days before the submission closing.

It also remains incongruous that despite residents of 1 Margaret St being identified as key stakeholders, they were specifically avoided in the doorknock and letterbox campaign (Engagement Section on p8 of Community Consultation Plan for SSD10382). Again hardly “*accessible, proactive and transparent engagement*”.

### **Point 10: Inadequacy of EIS as it does not consider cumulative impacts of existing, approved and likely surrounding developments**

We note the proponent is currently constructing 13-23 Gibbons St, has 90-102 Regent St under application and 104-116 Regent St (SSD-12618001) has applied for SEARs. The three developments result in an additional 1239 student beds in contiguous properties. This is in addition to the existing Iglu student accommodation buildings on two adjacent sites. All these facilities are located in a city block measuring ~200m x 70m. Nowhere does the EIS mention or attempt to assess the impact of this intense concentration of usage monoculture and the impacts this would have on cohesion, amenity, the neighbourhood and dislocation.

Based on the latest census data, these almost completed, planned and proposed student beds would represent a 12% increase to the total Redfern population in an area comprising less than 2% of the suburb. The impact of this concentration from a very specific demographic with limited affinity to the area or even medium term tenancy likelihood (“Student Housing Experiences in Australia December 2019” reports that 59% of students in purpose built student accommodation left within 6 months generally citing affordability issues) would totally alter the fabric of the suburb. The EIS or Response to Submission neither acknowledges this issue or attempts to assess its significance.

The analysis of cumulative impact in the EIS of these major demographic changes to the suburb is largely confined to:

- Some minor adjustments to the precise building location on the site
- A public transport analysis that counts the number of public transport routes in the suburb and assumes because parking will be difficult, none of the 2,000 students will therefore own a car. A more likely outcome is that a small number of the students and a larger number of their visiting friends will own cars and further stress an already difficult public parking situation.

Sydney Council has committed substantial resources over many years to defining planning policies that will create a cohesive, integrated, diverse, equitable and sustainable city. This includes “A City for All: Towards a Just and Resilient City (September 2019)” and “City of Sydney Local Housing Strategy (June 2020)” amongst many others. The EIS is silent on all/most of these principles.

We also note that the proposal does not result in any additional affordable housing capacity (single student rentals of ~\$450-500 per week are expected) or result in any meaningful new public space being created.

We remain firmly of the belief that the current proposal should be rejected and a new EIS submitted. The new EIS should assess the project in the context of all 3 Wee Hur proposals and their full societal impact on western Redfern rather than each proposal being assessed incrementally in isolation with many major issues ignored.

It is also worth commenting that if the project location was moved directly across Regent St, planning permission would not be achievable due to the height and scale of the building. Project approval in the current form would also be unlikely if meeting Sydney City guidelines was required.

**Point 11: No consideration of cumulative impacts of construction**

The proponents response does not in any way address the issue raised of the prospective cumulative impact of ~5 years of largely continuous construction by the 3 contiguous Wee Hur projects. The response merely comments on actions proposed for this specific SSD9194 proposal and does not acknowledge that this construction process could be expected to be repeated twice more by Wee Hur.

**Point 12: High concentration of high density student accommodation seems short-sighted, lacking meaningful diversity, potential to create undesirable issues over time and anxiety over future uses if current downturn in international students becomes permanent.**

**Proponent Response:** *The proposed mixed-use development, including retail and student accommodation, is consistent with the land use zoning and other development within the locality*

Please refer to Point 10 above - the same comments apply. The only answer given to major public concerns is that the project is permissible.

The SSD10382 Response Report makes no attempt to answer the student density concern and principally refers to Appendix L of the EIS which deals with low level management issues at the proposed facility (such as whether pastoral care will be supplied for residents and that automatic watering systems will be employed in terrace gardens).

It also appears misleading that a development which apparently comprises 17 floors of student accommodation and two retail outlets on the ground floor can be described as “mixed-use development”.