

14th April, 2013

Planning NSW
Ms. Caroline Owen,
Bridge Street,
SYDNEY NSW 2000

Dear Caroline,

Ref: MP06 0171 MOD 8, MP08 0253 MOD 4 & SSD 5700-2012

I make the following objections to the above mentioned applications by Frasers for the Central Park site.

This proposal represents a significant departure from the land uses which were originally considered for this particular site, and with that departure comes a completely different set of potential impacts, none of which appear to have been adequately addressed. It has the potential to substantially change the character of the locality which is likely to result in corresponding social and economic impacts. *It does not comply with the Concept Plan.*

This application does not contain a Social Impact Assessment (SIA) for the project. Commercial use is the predominate land use which has been identified in all of the key strategic documents for this area of the Central Park site, and a shift towards housing for student accommodation is a substantial movement away from this original land use and has significantly different potential implications on the local area, all of which need to be addressed in a comprehensive social impact assessment.

The following non-compliance items relating to SEPP 65 are noted from Appendix 1 of the EIS:

1. Building separation, should be 14 metres but is less than 13 metres
2. Building orientation for solar access
3. Site area available as deep soil planting areas, to allow mature tree-planting
4. Minimum unit sizes, to provide adequate space for resident comfort and utility
5. Minimum percentage of kitchens with natural ventilation, to minimise the need for mechanical ventilation and energy consumption
6. Solar access in mid-winter. Only has 42% compliance with extended catchment hours ie: 0700 to 1700 hrs
7. Storage areas, for occupants' use
8. Minimum balcony depth, for adequate outdoor open space

The environmental risk assessment is incomplete and should be revised. Changing from commercial to residential use would have a detrimental effect on economic activity. This has not been factored into the risk assessment and should have been. Neither have the substantial social risks of overloading this area with a demographic dominated by foreign students.

The Director-General's Requirements required the economic impact assessment to address " ...specifically (the) impacts resulting from the deletion of the approved commercial floor space and the provision of a predominantly residential development." The EIS does not identify what the consequences of removing the office space may be, as the DGRs explicitly require.

The economic impact assessment, is subjective ,misleading and incomplete. It does not address alternative uses for the Block 4S site. For example:

- Whether there are other forms of development, which may also have positive economic and social effects in the locality, to a greater degree than would student accommodation.
- Whether the Central Park precinct and the locality would benefit from a greater proportion of permanent-resident housing overall,
- The quantum of student housing proposed for Central Park, with regard to strategic planning objectives, for the site and the locality
- Planning and development of a State Significant Site which should not be driven by relatively short-term economic conditions.

The design of the proposed building is highly purpose-built. The lack of adaptability to other uses of such a purpose- built project brings its longer term sustainability into question.

The "affordability" of the rent for the proposed accommodation, for students, is questionable.

Permanent residents are more likely to provide a greater contribution to both day-time and evening economies compared with students. A high proportion of permanent households would have higher disposable incomes than student households.

With regards,

Peter Waller
Chippendale 2008