Pemulwuy (Precinct 3), Redfern

Social Impact Statement - Supplementary Information

Prepared for DeiCorp Constructions NSW P/L

April 2018

urbanadvisers

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1 Background

On 23 November 2017 Deicorp Constructions Pty Limited lodged an application to modify an approved concept plan for a mixed use development (MP06_0101) at "The Block," bounded by Eveleigh Street, Vine Street, Louis Street and Caroline Street in Redfern. The application was accompanied by a Social Impact Statement, dated June 2017 prepared by Urban Advisers, on behalf of the proponent. In assessing the application, the Department of Environment and Planning has identified additional matters that they would like to be addressed in the social impact statement. This document responds to the Department's request.

The Department's request for additional information was set out in an email dated 1 February 2018 and forwarded to Urban Advisers on 28 March 2018. It requested the following:

- 1. The applicant should actively seek a range of views (by interview not public meeting) to reflect multiple perspectives in the community, including dissenting voices.
- 2. Further research should be done to include analysing and assessing potentially significant impacts that might fall into the following categories: way of life, community cohesion and character, access to infrastructure and services, culture (particularly Aboriginal culture) and surroundings.
- 3. The assessment of impact significance should use a recognised approach (e.g. social risk assessment) and include an assessment of cumulative impacts and propose mitigation measures.
- 4. The applicant should submit a monitoring and management plan, including plans for responding to unforeseen social impacts.

Items 3-4 are addressed below. Item 1 is addressed under a separate cover as extensive community consultation has been undertaken for the proposed development. Outcomes from the community consultation has informed the social impact statement and this document.

1.1 Points of clarification

In relation to the request for additional information, the Department is requested to note the matters set out below.

1.1.1 Scope of the social impact statement

The current application seeks to modify an approved application (MP06_0101MOD2) that comprised 62 social and affordable dwellings for Aboriginal and Torres Strait Islander people, retail and commercial suites, a 60 place child care centre and student accommodation of 154 rooms. The current application seeks approval to modify the approved student accommodation element of the development only. The modification, if approved, will increase the number of student accommodation rooms to 522 ("the proposed development").

Accordingly, the scope of the social impact statement is limited to:

- The proposed increase in student accommodation from 154 rooms to 522 rooms, being an additional 368 student rooms
- The changed design of the proposed building on Precinct 3 (fronting Eveleigh Street) which has been formulated through a design excellence process to comprise a building of up to 24 storeys.

Any other social impacts arising from the approved development are not within the scope of the social impact statement as these will already have been considered and assessed in the previous application. Any potential social impacts arising from other development in the area, including the development of precincts 1-3 of Pemulway, forms part of the context for the social impact statement only.

1.1.2 Secretary's Environmental Assessment Requirement's

The Secretary's Environmental Assessment Requirement's issued on 22 December 2016 set out requirements for environmental assessment of the proposal including:

"8. Social Impacts: The EA / EIS must include a Social Impact Assessment (SIA) that considers the impact of the proposal on the Redfern community. The SIA must address the relocation of existing residents during the construction phase of the proposed development (including opportunities for rehousing) and any longer term impacts on the immediate and wider Aboriginal community."

It is understood that the proponent has previously discussed with the Department of Planning and Environment that the above requirements cannot be delivered as residents were relocated from the site several years prior to the SEARs being issued. The requirement for a plan to manage the relocation of existing residents during the construction phase is clearly not necessary as there are no existing residents on the site to relocate and the site is vacant.

Urban Advisers was engaged by Deicorp Constructions to prepare a social impact statement that considered whether the additional student accommodation is justified, having regard for housing market and the overall benefits of the proposed development. That scope of works seemed appropriate given that the SEARs request did not reflect the current situation and the scope of the social impact assessment is limited to the increase in student housing. The Department has now requested that additional matters be addressed.

1.1.3 Methodology

Item 3 of the request for additional information suggests that the social impact statement provided by Urban Advisers does not follow a recognised approach. That is not the case. The methodology used in the social impact statement is consistent with a multitude of academic literature on social impact assessment including Vanclay (2006) *International principles for social impact assessment (*prepared for the International Association for impact assessment), Ziller (2012) *The new social impact assessment handbook*, Burdge (2009) *The concepts, process and methods of social impact assessment*, the Planning Institute of Australia's *Social Impact Assessment Policy* and more.

The Department's request for additional information suggests that social risk assessment, as outlined in their recent *Social Impact Assessment Guidelines for State Significant Mining, Petroleum Production and Extractive Industry Development,* provides a suitable approach. It is noted that the Guidelines were released after the social impact statement was prepared and submitted to the Department. It is further noted that the proposed development does not comprise state significant mining, petroleum production and extractive industry development and hence, the application of that guideline to the proposed modification of a concept plan for additional student housing is not mandatory. Nor is social risk assessment a prescribed methodology and any environmental planning instrument or policy. Regardless, this document has adopted the approach outlined in the Department's Guideline.

1.1.4 Mitigating measures

The request for additional information states that the social impact statement should include mitigating measures. Mitigating measures are considered and documented in the social impact statement on pages 41, 43

44 and 45. For ease of reference, a consolidated schedule of mitigating measures is provided in Section 2.6 of this document.

2 Additional information

2.1 Community cohesion and character

Community cohesion refers to the physical or psychological separation or cohesion between different areas in the community or that reinforces an existing severance or brings together that community. Community cohesion involves:

- creating a common vision and sense of belonging
- valuing and appreciating people from different backgrounds and circumstances
- providing similar life opportunities for people from different backgrounds
- developing strong, positive relationships between people from different backgrounds in the workplace, in schools and within neighbourhoods
- brokering good relations between groups and communities.

These matters are considered below and in section 8.2 of the Social Impact Statement.

The proposed Pemulway development is intended to deliver a mix of affordable housing for Aboriginal and Torres Strait Islander people and students. As such, the proposed development presents an opportunity to improve access to housing and promote equality in opportunity for persons regardless of their religious belief, political opinion, racial group, age, marital status or sexual orientation. The proposed development will increase the choice of available social and affordable housing which can only benefit community cohesion. The proposed development will make viable the development of affordable Aboriginal Housing, providing the means for Aboriginal and Torres Strait Islander people to return to The Block.

The social impact statement noted that the AHC are striving to provide a safe environment for families and older people. Altira Student Living, operators of the student housing component of the proposed development, has indicated that in other locations they have successfully fostered and promoted good relations between persons of different religious belief, political opinion, and racial group. Thus, the two key components of the proposed development are aligned in terms of a common vision and community cohesion.

The existing community is highly diverse with a mix of cultures, incomes, ages and household types. The proposed student accommodation will contribute to the already significant student population in the neighbourhood. The proposed development will contribute to the student culture of the precinct and is unlikely to have a divisive impact.

Pemulwuy will make a positive contribution to a vibrant community by providing affordable housing, businesses and community facilities in an area that is already diverse. The additional student accommodation will support the return of Aboriginal and Torres Strait Islander people to The Block by improving the feasibility of the development to allow the provision of 62 dwellings for Aboriginal and Torres Strait Islander people and families.

	Consequence level				
Likelihood level	Minimal	Minor	Moderate	Major	Catastrophic
Almost certain					
Likely					
Unlikely					
Low		Moderate		High	

Table 1: Social Risk matrix – Community cohesion and character impacts

2.2 Access to infrastructure and services

Ease of accessibility and safety with which people in the community can move both within the community and externally to it, including vehicular, pedestrian and cyclist movements, will assist the integration of the development and future residents into the existing community. Various information on access to infrastructure an services has already been submitted to the Department. The Public Domain and Public Art Strategy developed by Scott Carver considered pedestrian movement. The social impact statement includes a thorough examination of access to community facilities and services (section 7). Access to transport has been considered in a report by Baker Ryan Stewart. Access for people with a disability has been addressed in a separate report by Architecture and Access.

During construction, road works and the movement of construction vehicles may impact on activity and access to residential homes in the neighbouring streets. Mitigation measures to ensure that access to properties is to be maintained during construction of the proposal will be appropriate. A traffic management plan could be developed and implemented to minimise potential hazards, risks and confusion arising during construction. This plan could be advertised to inform the community of proposed changes to traffic movement, and to allow for ongoing operation of the road in a safe manner.

The proposed development will improve accessibility in the neighbourhood and improve safety and convenience for pedestrian by providing through block pedestrian links (Figure 1). Potential for traffic congestion and implications for pedestrian safety has been assessed in the Traffic and Parking Impact Assessment by Baker Ryan Stewart and it was found that the road network is able operate at safe levels. The Traffic and Parking Impact Assessment has been prepared in accordance with the requirements of the RMS's 'Guide to Traffic Generating Developments' and City of Sydney DCP. It found that:

"As the site is so well-located for pedestrian trips, the proposed traffic generation from the site is not expected to exceed the current traffic generation. It is therefore considered that the proposed development will not have any adverse impacts to the operation or safety of the surrounding road network, and will not likely generate any private vehicle traffic at all. There would be no warrant or nexus to upgrade the road infrastructure in the vicinity of the site as a result of any post-developmental impacts of traffic generated from the site. The Traffic and Parking Impact Assessment concludes that the subject site is suitable for the proposed student housing development in relation to the impact of traffic, vehicle access, parking and safety considerations. The development is considered to have negligible effect on the operating outcome and the level of service of the surrounding transport network"

The development and surrounding public domain have been designed to establish a high standard of civic design, pedestrian amenity and safety.

The access strategy prepared by Architecture & Access (Aust) Pty Ltd advises that the proposed development has been designed:

- to provide access for people with disabilities as required by the Disability Discrimination Act 1992
- to promote the concept of an accessible environment for the whole community
- to be accessible by people with a disability in accordance with Australian Standard 1428 Design for Access and Mobility.

The assessment of community facilities and services undertaken in the social impact statement found that there is capacity in existing services to support the potential increase in population to result from the proposed development.

The proposed development presents no significant concerns in relation to access to infrastructure or services.

Table 2: Social risk matrix – access to infrastructure and services

	Consequence level				
Likelihood level	Minimal	Minor	Moderate	Major	Catastrophic
Almost certain					
Likely					
Unlikely					
Low		Moderate		High	



Figure 1: Pedestrian movement

Source: Scott Carver Public Domain Strategy

2.3 Culture

The potential for the proposed development to impact on the culture of the neighbourhood has been considered including the potential impact on Aboriginal and Torres Strait Islander culture, as this is an identified group with shared customs, obligations, values, language, religious belief and other elements. Also relevant is the significant student population of the neighbourhood which is more diverse in character (see section 6.5.7 of the social impact statement).

In general, the proposed development is expected to have a positive impact on Aboriginal and Torres Strait Islander lifestyles and culture (see section 8 of the social impact statement). The proposed development will facilitate the delivery of housing for Aboriginal and Torres Strait Islander people, on a site with special significance and owned by the Aboriginal Housing Company (AHC). This can only reinforce and strengthen the culture of the community. The proposed development will support the broader lifestyle and culture of the Aboriginal and Torres Strait Islander people by delivering improved housing and bringing Aboriginal and Torres Strait Islanders back to The Block. The ultimate success of the project may support future Aboriginal Housing developments by the AHC.

The project is an important opportunity for the AHC to build facilities for future generations. It is imperative that the project is financially viable and sustainable. To this end, the project is to incorporate a commercial precinct which will generate income necessary to achieve the long term goal of delivering affordable Aboriginal Housing in Redfern. The AHC business model will diversify income from the commercial component of the Pemulwuy project to sustain the affordable housing on the Block and beyond. Commercial rents will in effect, subsidise the delivery of affordable housing. The business model is also intended to allow the AHC to reduce the dependency of Aboriginal and Torres Strait Islander people on the government¹.

The significance of the precinct to Aboriginal and Torres Strait Islander culture is to be recognised in public domain improvements including:

- the establishment of a unique urban identity through the application of the Pemulwuy graphic, materials, cultural interpretive elements and plant selections to reinforce the shared pedestrian/vehicle zone in Eveleigh Street between Lawson and Caroline Streets and the substantial public open space areas proposed in the Project
- integration of cultural interpretation elements with the architecture and public domain
- application of crime prevention through environmental design principles in the design of the public domain to optimise public safety.

Table 3: Social risk matrix – culture

	Consequence level				
Likelihood level	Minimal	Minor	Moderate	Major	Catastrophic
Almost certain					
Likely					
Unlikely					
Low		Moderate		High	

¹ Op cit.

2.4 Way of life

Way of life refers to how people live - for example:

- how people get around
- access to adequate housing
- how people work
- access to adequate employment
- how people play, for example, access to recreation activities
- how people interact with one another on a daily basis

Table 4 below demonstrates how the various factors considered above and in the Social Impact Statement collectively impact on way of life.

Variable	Comment
Getting around	 Movement of people through the neighbourhood may be temporarily impact during construction – mitigation strategy is proposed in section 2.6. The proposed student accommodation is located in close proximity to Redfern train station and major education institution (see section 3.1of the SIS) Pedestrian movements will be enhanced by planned improvements to the public domain The proposed development will connect well with the existing pedestrian and road network
Access to adequate housing	 The proposed development will deliver an additional 366 student dwellings The area has a demonstrated need for additional student accommodation The proposed development will make viable the delivery of social and affordable housing for Aboriginal and Torres Strait Islander people. The proposed development will significantly increase access to adequate housing
Access to work	 The proposed development is located within Sydney's economic arch that has the highest concentration of employment in greater Sydney – extending from Chatswood to Sydney airport. The close proximity of the site to Redfern station and Cleveland street provide excelled public transport access to jobs. The proposed development is in an excellent location in terms of access to jobs.
Access to recreation	 An audit of recreation facilities in the surrounds is provided in section 7.3 of the SIS The proposed development will have access to a broad range of recreation facilities
Access to services	 An audit of community facilities in the surrounds is provided in section 7 of the SIS The proposed development will have access to a broad range of community facilities and services
Opportunities for interaction	 Opportunities for interaction may be temporarily reduced during the construction period – mitigation strategies proposed is section 2.6 below. Opportunities for interaction will be enhanced by the improved public domain, open space and pedestrian network.

Table 4: Potential Impacts related to way of life

Table 5 provides a risk assessment for the potential impacts to wellbeing.

Table 5: Social risk matrix – way of life

	Consequence level				
Likelihood level	Minimal	Minor	Moderate	Major	Catastrophic
Almost certain					
Likely					
Unlikely					
Low		Moderate		High	

2.5 Cumulative impacts

Cumulative impacts are those resulting from the incremental impacts of an action added to other past, present, and reasonably foreseeable future actions regardless of which agency or person undertakes them. The subsequent, flow-on effects of the proposal, including the second/third order impacts and their incremental impacts when added to other past, present and foreseeable current activities. Secondary or indirect impacts are those caused by the primary or direct impacts; they often occur much later, both in time and geographic distance than primary impacts.

A social risk assessment indicates the likely risk of cumulative impact arising from the proposed development.

Table 6: Social risk matrix – cumulative impacts

	Consequence level				
Likelihood level	Minimal	Minor	Moderate	Major	Catastrophic
Almost certain					
Likely		*			
Unlikely					
Low		Moderate		High	

2.6 Mitigation measures

Mitigation measures proposed in the social impact statement and above are collated and summarised below:

Table 7: Mitigation measures

Mitigation	Strategy
Communication management	Effective communication with the community regarding details relating to the DA and construction through:
	 providing written communication to residents to inform them of the status of the DA and construction timeframes regular briefing sessions for all staff to ensure that their knowledge about the DA and construction work is accurate and current providing a key contact person who can answer questions

Mitigation	Strategy	
Construction management	 A construction management plan can be prepared to manage potential impacts during construction including: dust noise vibration potential health risks visual amenity (hoardings etc.) 	
Traffic management	 A traffic management strategy could assist in managing potential traffic impacts during the construction phase: increased truck movements traffic and road closures for construction vehicles impacts of increased traffic on a narrow street 	
Monitoring	 Once operational, Altira could monitor potential impacts on community wellbeing and safety in the neighbourhood including anti-social behavior and overcrowding of public spaces. This should include: Displaying contact detail at the premises so the community will know who to contact in the event of an incident Establishing a register of complaints, to monitor and assist in formulating a response to issues as they arise Undertaking an annual survey of residents at the proposed development Establishing regular contact with the local police so that management is aware of issues in the community and to maintain a good working relationship with the police Participating in community events and community groups so that the proposed Supporting local causes as appropriate. 	
Integration with the community	 Operators of the student accommodation are encouraged to: Examine opportunities for preferential consideration to accommodating Aboriginal and Torres Strait Islander university students Source local employees including residents of the student and Aboriginal and Torres Strait Islander accommodation at Pemulway Hold occasional and regular events for student residents Display in a visible location within the proposed development (e.g. the foyer or at the administration office) information on: Local community groups and organization including Aboriginal and Torres Strait Islander and other cultural groups Local community services and facilities for residents (e.g. medical centres, recreation facilities etc.) Display a code of conduct Display management contact details and grievance procedures. 	
Potential unforeseen impacts	 Management at the proposed development should put into place appropriate management strategies to deal with any unforeseen issues that may arise. This should include: Displaying contact detail at the premises so the community will know who to contact in the event of an incident Identifying issues early by: Establishing a register of complaints, to monitor and assist in formulating a response to issues as they arise Recording issues raised by residents at the proposed development Providing a suggestion box for residents at the proposed development 	

Mitigation	Strategy
	 Undertaking a monthly review of complaints and suggestions Undertaking an annual survey of residents at the proposed development Establishing contacts in the community so that management is positioned to respond quickly to issues as they arise including: Redfern police station Management of the Aboriginal and Torres Strait Islander housing, once established Sydney University and UTS The local chamber of commerce Relevant community groups Community services

2.6.1 Monitoring

Monitoring will ensure that social impacts are identified and measured, and that mitigation is implemented. A monitoring program should be developed by the operator of the student housing in consultation with the key stakeholders during the finalisation of the development phase. Initial monitoring actions are indicated below.

The Project Commitments Register will also monitor and document compliance with the EIS and conditions of approval.

The key objectives of the monitoring program will be to:

- demonstrate compliance with the EIS and conditions of approval
- track the identified impacts and the delivery of the mitigation strategies
- identify any new unforeseen impacts arising from changing conditions and develop responses
- enable regular stakeholder contact and feedback.

To facilitate the monitoring process, various reporting mechanisms will be put in place including a communications strategy with future and neighbouring residents. This will provide an opportunity to:

- report on activities at the student accommodation including any upcoming events
- disseminate up-to-date information on construction works at other components of the Pemulway development
- provide monthly review of grievance and dispute resolution, as appropriate.

2.6.2 Management plan

An Operation Management Plan was included in the Social Impact Statement at Appendix 2. The application also includes a Construction Management Plan and a Waste Management Plan. The Department has requested an additional management plan.

The following outlines a Social Impact Management Plan to ensure the AHC and Altira manages the operation of the proposed student accommodation in compliance with its regulatory obligations and ensures the proposed development makes a positive contribution environment and the safety of all members of the community. The plan sets objectives for Altira when commencing operations at the proposed development. The plan should be reviewed and finalised as the project advances.

The SIMP should be considered in conjunction with the other management plans submitted with the Environmental Impact Statement:

- Traffic Management Plan
- Waste Management Plan
- Operation Management Plan

Table 8: Management Plan

Mitigation	Management strategy	Responsibility	Timeframe
Communication management	Provide written communication to residents to inform them of the status of the DA and construction timeframes	Proponent / AHC	Immediate and ongoing until constructions is complete
	Maintain current information about construction on AHC website	АНС	
	Provide a key contact person who can answer questions (contacts may be different for each stage)	Proponent / AHC	Construction phase
	Provide a neighbourhood liaison contact person at the proposed student accommodation for neighbours to contact should any incidents	Proponent / AHC Management (Altira)	Operational phase and ongoing
Construction management	Make a copy of the construction management plan available to residents either on the AHC website or in hard copy from an accessible location on site	Proponent / AHC	Construction phase
	Publish regular updates on the AHC website	Proponent / AHC	Construction phase
	Advise residents of expected impacts in advance	Proponent / AHC	Construction phase
	Display on site, details of a contact person who is fully informed of construction works and able to accurately answer questions of community stakeholders	Proponent / AHC	Construction phase
Traffic management	Make a copy of the traffic management plan available to residents either on the AHC website or in hard copy from an accessible location on site	Proponent / AHC	Construction phase
	Publish regular updates about changes to traffic movement on the AHC website including any road closures or redirections	Proponent / AHC	Construction phase
	Advise residents of expected impacts in advance	Proponent / AHC	Construction phase
	Display on site, details of a contact person who is fully informed of construction works and able to accurately answer questions of community stakeholders	Proponent / AHC	Construction phase

Mitigation	Management strategy	Responsibility	Timeframe
Integration with the community	Develop strategies to facilitate accommodating Aboriginal and Torres Strait Islander university students at the proposed development	Operator/Altira	Operational Phase
	Source local employees including residents of the student and Aboriginal and Torres Strait Islander accommodation at Pemulway including advertising positions in a display area(s) in Pemulway	Operator/Altira	Operational Phase
	Establish a display area for student information	Operator/Altira	Operational Phase
	 Collate and display information on: Local community groups and organization including Aboriginal and Torres Strait Islander and other cultural groups Local community services and facilities for residents (e.g. medical centres, recreation facilities etc) Display a code of conduct Display management contact details and grievance procedures Any other relevant material 	Operator/Altira	Operational Phase
Monitoring	Refine operation procedures to monitor impacts on community wellbeing and safety in the neighbourhood including anti-social behavior and overcrowding of public spaces.	Operator/Altira	Operational Phase
	Display contact detail at the premises visible to the community will know who to contact in the event of an incident	Operator/Altira	Operational Phase
	Establish a register of complaints, to monitor and assist in formulating a response to issues as they arise.	Operator/Altira	Operational Phase
	Undertaking an annual survey of residents at the proposed development	Operator/Altira	Operational Phase
	Make bi-monthly contact with the local police so that management is aware of issues in the community and to maintain a good working relationship with the police	Operator/Altira	Operational Phase
	Join community groups	Operator/Altira	Operational Phase
	Monitor local newspapers and websites for local events	Operator/Altira	Operational Phase

Mitigation	Management strategy	Responsibility	Timeframe
Mitigation Potential unforeseen impacts	 Refine management plan to facilitate rapid and appropriate responses to any unforeseen impacts Displaying contact detail at the premises so the community will know who to contact in the event of an incident Identifying issues early by: Establishing a register of complaints, to monitor and assist in formulating a response to issues as they arise Recording issues raised by residents at the proposed development 	Operator/Altira	Operational Phase
	 Providing a suggestion box for residents at the proposed development Undertaking a monthly review of complaints and suggestions Undertaking an annual survey of residents at the 		
	proposed development		
	Display a phone number at the premises so the community will know who to contact in the event of an incident	Operator/Altira	Operational Phase
	 Develop an action strategy to identifying and resolve issues early including: Regular review of the register of complaints/incidents Maintain regular contact and keep contact details readily available to management staff for key organaisations including the AHC, Redfern Police, Sydney University, UTS Record issues raised by residents at the proposed development Allocating clear responsibilities for regular monitoring Allocate responsibility for formulating responses to issues as they arise 	Operator/Altira	Operational Phase

Mitigation	Management strategy	Responsibility	Timeframe
	 Allocate budget and responsibility for the annual survey of residents 		
	Identify relevant community organisations and:	Operator/Altira	Operational Phase
	 Collect and display information for residents Participate in community activities 		
	Allocate responsibility for quarterly liaison with:	Operator/Altira	Operational Phase
	Redfern police station		
	 Management of the Aboriginal and Torres Strait Islander housing, once established 		
	Sydney University and UTS		
	The local chamber of commerce		
	Relevant community groups		
	Community services		

3 Conclusions

The proposed development involves modification to concept plan for student accommodation development which will result in an increase of 368 beds on the site. The built form aspect of the application is address in separate DA documentation.

The proposed development will provide a high quality, purpose designed and managed student accommodation. The site is located in an area with high demand for student and affordable housing. The supply of student accommodation in the area is increasing, however, the current supply is inadequate for demand. The proposed development will assist the market to meet the dement for quality, affordable student accommodation.

The proposed development is on a site which is held in the highest regard by the Aboriginal and Torres Strait Islander community. The proposed development will make viable, the delivery of 62 affordable dwellings for Aboriginal and Torres Strait Islander people, creating an opportunity for Aboriginal and Torres Strait Islander people to return to The Block and continue their strong heritage in the area. The proposed development will not substantially alter the impact of the Pemulwuy development on the neighbourhood, from that of the approved development. It will deliver increased benefits through additional student accommodation and improved feasibility of the affordable Aboriginal Housing component of the Pemulway development.

The proposed development has been formulated through a design excellence process and will make a positive contribution to the built environment, streetscape and local amenity – providing improved public domain and pedestrian networks.

The assessment of potential social impact has not identified any impacts that cannot be mitigated. Mitigation strategies have been presented in a consolidated management plan to assist implementation. Further refinement of the management plan can occur as the proposal progresses from concept application to development.

Having regard for the various social impacts considered in this supplementary information, Urban Advisers stands by and reaffirms its original conclusions that the proposed development will have a net community benefit. The proposed development is supported.