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Thursday, 10th December 2020

The Minister for Planning – NSW Government Planning and Environment
Via Email Submission

Attention: Director – Key Sites Assessments, Minister for Planning

Re: Objection to Application SSD10382 at 90-102 Regent Street (SP 57425, Lots 1-3 Section 2 in DP 3954, Lot 1 in DP 184335) proposing the construction of an 18 storey student accommodation development.

Dear Minister,

I am writing to you as the owner of the heritage property, 118 Regent St, Redfern, known as the former St Luke's Presbyterian Church building ('St Luke's Church'). We are writing to object to the proposed construction of an 18 storey student accommodation development which comprises of 408 beds and 381 residential rooms ('Proposal').

Overview of the Scope of and Detriment caused by the many and various Issues in the applicant's Proposal:

The development is too large in scale, bulk and size given its context and the immediate low scale surroundings of the site to its east and south and especially in consideration of its proximity to the heritage property St Luke's Church, a culturally and historically significant structure. An immediate and significant concern would be that a significant increase in overshadowing would occur as a result of the proposed development.

The visual impact of the proposed development is substantially detrimental to the heritage of St Luke's Church given its congested design (above a homogenously designed podium level), again, due to the development's proposed use, bulk and scale. St Luke's, once the dominant building of the entire streetscape, currently presents a prominent line of sight view to those travelling on Regent Street which will be substantially and negatively impacted by the applicant's proposal. Additionally, the proposed use of student accommodation results in a considerable decrease in amenity, variety and degradation of the unique and distinct built environment and context of the surrounding area. This use of only Student accommodation is not mixed or diverse enough and is not in the spirit of the Zoning nor aligned with the zoning's objectives, intentions and the best interests of the

Redfern precinct and community. The high-density nature of this development also increases congestion with an immediate adverse impact on the area.

To support this objection this letter provides an overview of all areas of concern, setting out the many and various detriments to 118 Regent Street and identifies key issues associated with the heritage site and the proposed development which are follows:

- 1. Detrimental Impact of Proposal to the Heritage of 118 Regent St, Redfern**
- 2. Significant Material Overshadowing given St Luke's Church's proximity to the Proposal**
- 3. Visual Impact Issues and the Proposal's undermining of the Regent St Streetscape**
- 4. Issues with scale, bulk and size given the close proximity of site and locality to St Luke's Church**
- 5. Oversaturation of Student Accommodation in the Locality and Resultant Decrease in Amenity to the Locality and Surrounding Area from the Proposed Use**
- 6. Construction and Vibration Impacts on St Luke's Church**

1. Detrimental Impact of Proposal to the Heritage of 118 Regent St, Redfern

118 Regent St, formerly, St Luke's Presbyterian Church, is a historically significant structure both architecturally and culturally. On the NSW Heritage register it is described as *“a fine (and rare) example of a Victorian Gothic Church which makes an important contribution to the streetscape and township of Redfern. It has social significance as a place of worship for the local community”*. While it is no longer a place of worship, the building has a significant social presence as a commercial premises open to the public, (of all faiths) to enjoy.

The Architectural design has tentatively been attributed to Herbert Samuel Thompson (image 1), an Australian born architect of some note. The son of one of the first councillors of the Eastern Suburbs, he was from a family deeply involved in the religious development of Sydney. Other heritage examples of his architecture are the Congregational Church (Milson's Point), Culwalla Chambers (King and Castlereagh Streets) and the well-known terraces behind the Marlborough Hotel (Missenden Road, Newtown).



(image 1) - H. S. Thompson.



(image 2) St. Luke's Church as it appears today.

Its physical description is *“a two storey Victorian Gothic style church. It has an asymmetrical façade... with an integrated tower at the north-east corner. Above the main entry is a large rose window. The roof is clad in slates. The side elevations present as 6 bays divided by engaged piers and each bay has tall twin-arch windows. A one bay deep extension presents to the rear”*, (image 2). The foundation stone was laid in 1872 and according to a 1911 article in the *Sydney Morning Herald* was completed by 1876. The building cost around 1,000 pounds and was constructed on land gifted to the congregation.

For many years this building was the predominant structure on Regent Street from Lawson Square to Botany Road (image 3). It was used as a landmark to accurately place Council reference photos and one would meet up past the Church, down past the Church or if part of the immediate community - at the Church, for a variety of religious and social purposes. Currently the community benefits from the complete and uninterrupted views available of this heritage building, from both directions on Regent Street (image 5).



(image 3) 118 Regent St - A landmark and a beacon for the community for almost 150 years.

The Church was the location of a public meeting to propose an organisation, which evolved into the Aboriginal Legal Service. Founding members were both Indigenous and Caucasian including famous activists such as Paul Coe, Gary Williams and Gary Foley. The service was Australia's first free legal service, setting the model for mainstream community legal aid (image 4). This organisation pushed the first legal actions for Land Rights and was instrumental in the return of Uluru to first nation peoples. As far as urban sites of indigenous significance go, the Church building is second only to the protected Salvation Army Hall at 150 Elizabeth Street where the first meetings to gain the vote for indigenous peoples were held.



(image 4) - St Luke's saw the birth of a ground-breaking organisation.

This structure is a rare early Gothic style ecclesiastical building on Regent Street, making an important contribution to the streetscape and township of Redfern. It has social significance as a former place of worship for the local community and in particular as a site of significance to the local Eora people and indigenous peoples nationally. As stated by the NSW Govt. Office of Environment and Heritage website, the building should be retained and conserved.



(Image 5) – Sunshine on the western side of the church, as God and architect intended. St Luke's, once the dominant building of the entire streetscape, currently presents a prominent line of sight view to those travelling on Regent Street which will be substantially and negatively impacted by the applicant's proposal, especially in relation to overshadowing.

2. Significant Material Overshadowing given St Luke's Church's proximity to the Proposal

A significant increase in overshadowing would occur as a result of the proposed development. St Luke's Church requires sunlight to be enjoyed by the community and for its occupants, being a heritage property and given its prominent history in the surrounding area.

Our previous objection to the recently approved 13-23 Gibbons St student accommodation development, was on the basis of significant and material overshadowing from the Gibbons St development proposal which will, in mid-winter, overshadow St Luke's Church from sometime after 11am (and prior to 12pm) to 3pm onwards.

Should this new Proposal by the same applicant be approved in its current form, additional material overshadowing will be incurred from just after 9am to sometime between 11am-12pm.

Essentially, should this proposal be approved in its current form, St Luke's Church will endure significant material overshadowing with overshadowing on the heritage building commencing, in mid-winter, from just after 9am with some form of overshadowing lasting all the way through to 3pm and beyond. The above is to say, the heritage building will be devastatingly overshadowed from the applicant's developments and that the current proposal must be refused as it is not in the best interests of the community and would

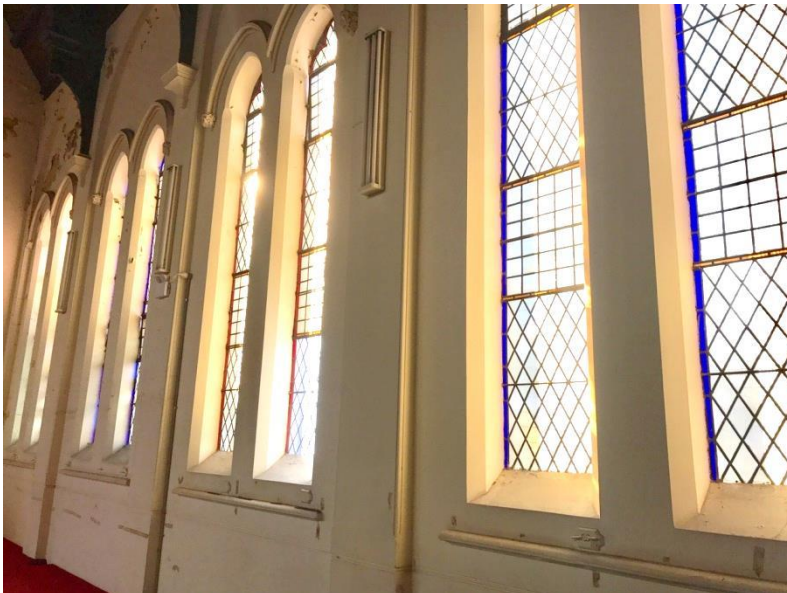
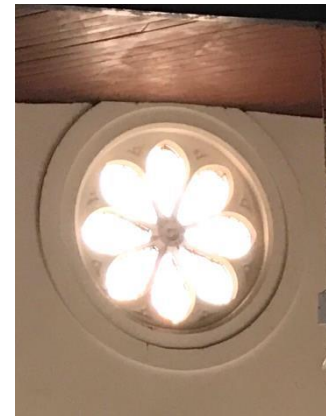
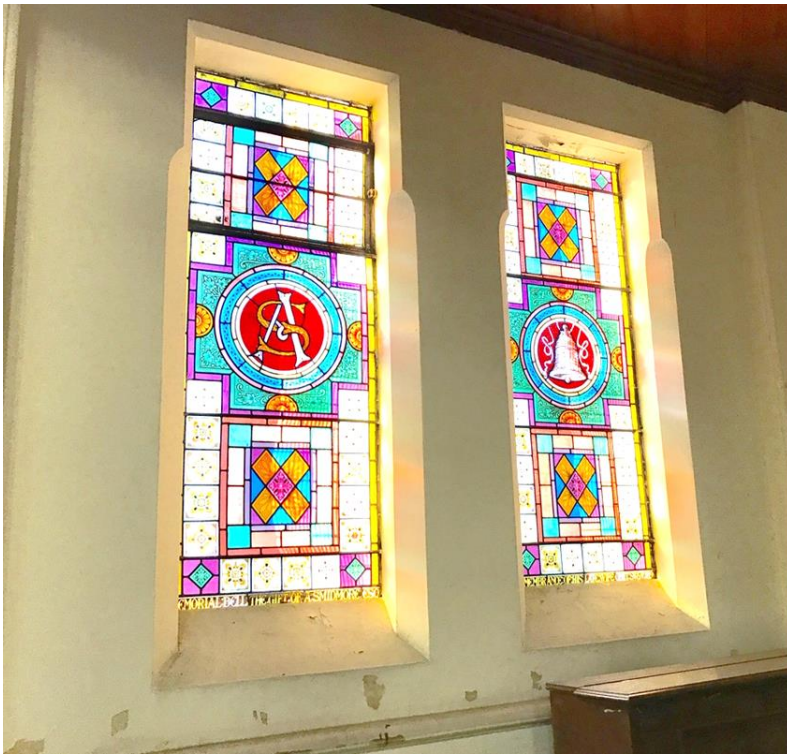
completely undermine the heritage and sun exposure the heritage church requires. In this regard, the heritage of the building and the issue of overshadowing are not only two separate devastating issues, but go together hand in hand as per the below explanation.

In 1878 Sydney's GPO was the first major building to be lit by electricity, two full years after St Luke's completion. It took nine years longer for the first street light, so it is evident that St Luke's, as a pre-electricity era church, is designed to maximise the use of natural light. The large windows with their twin-arches are an integral part of the design of the building and these would be greatly affected by overshadowing (images 5 and 6). The Heritage listed interiors could no longer be experienced as they were designed to, in their proper glory, or even to a merely adequate extent. The windows themselves, with their coloured glass and the feature stained glass windows would never be viewed as intended without the sunlight they require for proper effect (image 6).

It lies upon all of us to maximise the use of new technologies, such as Solar, to combat climate change. The heritage nature of this site includes restrictions that limit the possible use of solar technology. Only the rear section of the building can even be *considered* for Solar, massive shadowing means a detrimental reduction of sunlight available for Solar. As light levels drop the possibility of the building being adversely affected by moisture, structural damp, growth of mosses and lichens etc. may also increase, affecting the appearance and structural integrity. In particular there is the possibility that the slate roof would be affected by the growth of lichens and mosses encouraged by the shadowing thus increasing building maintenance costs. Inside, the natural sunlight also is an integral part of the design when it comes to maintaining the temperature of the building. This church was designed in an environmentally responsive manner. The massive changes to the micro-climate, due to overshadowing, will require more lighting, heating and cooling to the building, at a base level this increases owner and tenant costs and contributes to climate change with increased electrical use and dependence. It may also encourage the growth of mould internally and present a new health issue to be taken into account. In a time where all are encouraged to create a more eco-friendly, urban environment this development hampers the ability of the Church to take part in battling climate change directly and responsibly.

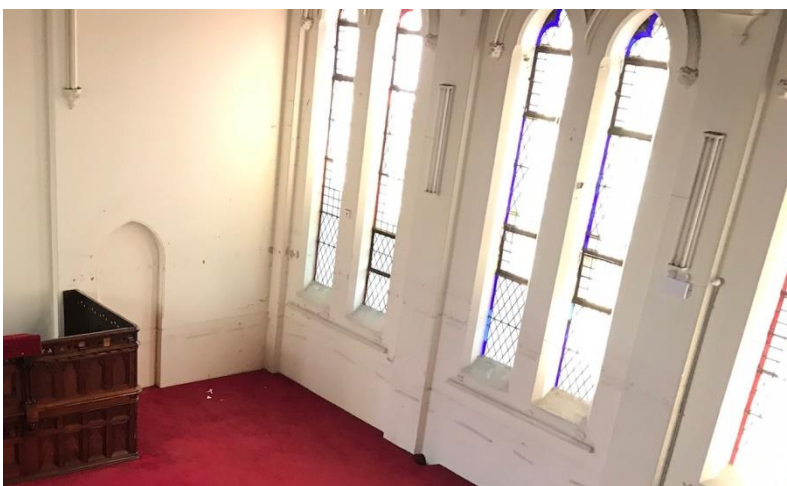


(image 6) Awash with sunlight, the Church interior glows – the almost 150 year historic and heritage-significant architecturally designed enjoyment of which is severely threatened and detrimentally impacted by the applicant's Proposal which will result in material overshadowing to the detriment of the heritage of the building and the community's reasonable and historic enjoyment of such sunlight and heritage.



(Top left image of stained glass windows facing Margaret St – the use and enjoyment of which will be severely impacted by the overshadowing caused by the applicant's proposal)

(Top right images of stained glass window above altar which also provided much needed light to the expansive church building and which would be materially and detrimentally overshadowed by the applicant's proposal).



(Bottom two images of feature windows facing Margaret St and current enjoyment of sunlight required for reasonable use of the heritage building by the current occupant and appreciation for the heritage building by the Redfern township and community)

We also submit that the impacts of the proposed development on St Luke's Church cannot be mitigated by considering the potential overshadowing of alternative 'compliant' developments/future developments, (as whilst they may be by definition compliant, they are still not necessarily, well planned, well considered or result in a good planning outcome – this is why developments go through an approval process). Nor should the shadowing of now approved buildings be used to create an argument to lessen the impact of more recent proposals and/or this proposal, which will significantly and materially overshadow the church. We note as per the shadow study provided on the Planning Portal that it is evident that from the shadowing shown as a result of the proposed development, (and observing the overshadowing from the Gibbons St building), that the Church will suffer from permanent and debilitating overshadowing should the current proposal go ahead as is.

The fact is that the current development proposal is proposing immense and detrimental overshadowing to St Luke's Church, which undermines the visual impact, solar access and heritage status of the property. We vehemently disagree with the current assessment that *"any overshadowing impact that may arise is likely to be an acceptable impact."* The Sydney Local Environmental Plan has a number of aims including 1.2 (2) (k) to conserve the environmental heritage of the City of Sydney and the Church is part of this heritage. The plan also provides to (h) to enhance the amenity and quality of life of local communities. 118 Regent St is an integral part of the local area's heritage. Although no longer functioning as a church, its current, low-intensity commercial use, (Zone B4 Mixed Use), works towards the intent of the zoning - which is to provide a mixture of compatible land uses that enhance the relationship between commercial and residential uses. The building, with its set trading hours, is even more inclusive for the community, open for all to enter, appreciate and experience the heritage architecture, features, arched windows and sunlight. It is vital that the existing solar access be retained and preserved for the former Church building, its occupants and to enhance the amenity and quality of life of our local community.

3. Visual Impact Issues and the Proposal's undermining of the Regent St streetscape

St Luke's was once the dominant building of this entire streetscape (image 3). The visual impact of the proposed development is substantially detrimental to the heritage of St Luke's Church, given its congested design (due to the exorbitant amount of rooms), proposed use, bulk and scale.

The applicant's SEARs report states that, *"Development along Redfern Street and Regent Street are typified by retail on the ground levels and apartments on the upper storeys."* (image 5) and the site currently hosts a row of two storey attached terraces with ground floor retail and an attached four storey mixed use building with ground floor retail. Of particular note is the degradation of the existing streetscape via the intended full demolition of Lots 1-3 Section 2 in DP 3954 & Lot 1 in DP 184335.



(image 7) – *Destruction of original and uniquely evolved streetscapes.*

The facades of these 4 buildings comprise more than 50% of the Regent Street side of the site and are part of the original, commercial, two-tier streetscape, (image 7). The loss of these Regent St facades deals another blow to the traditional flavour of this already assailed area on one of Sydney's oldest streets. Presenting a traditional, low scale shopping strip with its original patina of use is a rarity in Sydney (images 8 and 9). This area was only protected by a fortunate combination of its previously perceived undesirability, economic repression and the historical/cultural concentration of indigenous Australians.

The developer's own heritage assessment for their Gibbon's St building tried to diminish the visual impact of the Gibbons development by stating *"Planned developments immediately adjacent to the site location to the north and east of the site location will further undermine this setting in the future."* This new proposal is one of these planned developments. In their own words they state that the development we are currently evaluating will undermine the setting of the Church further. We believe that it is misleading to use a future proposal to gain concessions, then use those concessions to leverage more concessions, for more development. Especially when one realises 3 of the 4 planned developments for this one block are to be constructed by the same developer.



(image 8) *Regent St - Visible patina of use.*



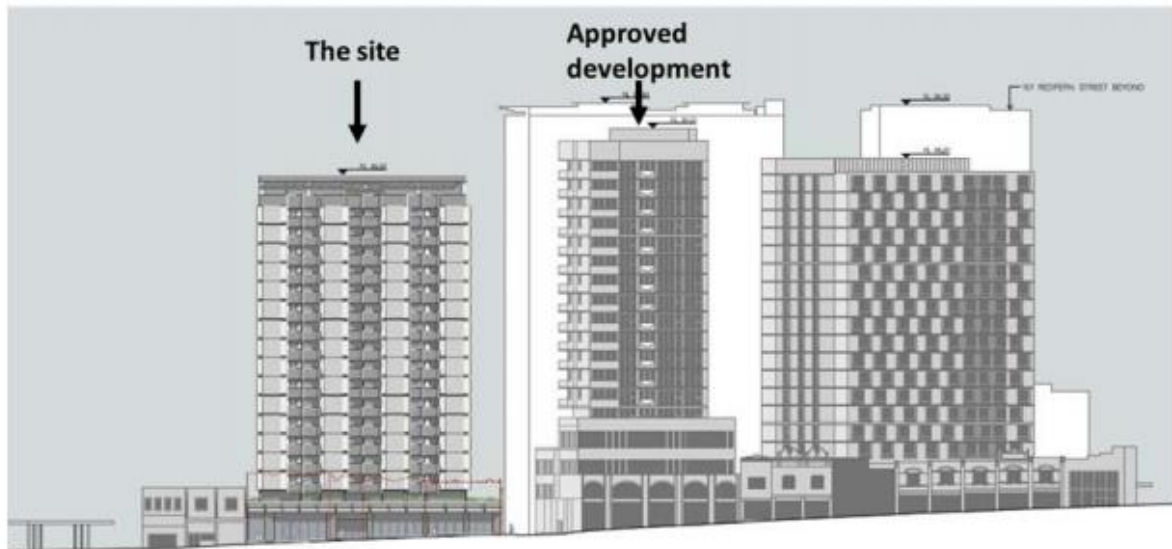
(image 9) *Regent St - A traditional 19th century vista.*

Although the current proposal says it references the original heights, purpose and usages of the existing development there is barely a nod to the presence, diversity and originality of the current structures. The proposed podium will not re-enforce the existing two storey character of Regent Street, it is no more than an ill-defined, straight line along the former face of the street with a bland and homogenous design. The line is not even at the height of the existing facades and once they are gone there is no visual reference remaining that indicates the natural patchwork growth of the area in small lots in the early Victorian

subdivision of William Redfern's original land grant. Indeed, referencing the applicant's own drawings (images 10 & 11) the red line shows the massive disparity between the original, evolved, façade and the developer's unimaginative podium. Stating that the design is "*a high-quality contemporary design that is complementary to surrounding developments*" does not make it an Utzon, a Seidler or even a Herbert Samuel Thompson. The design is as derivative and as homogenous as its intended purpose, it does not display any sympathetic architecture compliant to the history of the area. Rather, it presents elongated boxes, on end, driven by profit to house as many rooms as possible, ugly and bursting at the seams.

We need to keep in mind that 3 out of 4 developments on this block are by the same applicant/developer; in essence the three buildings should be treated as a single development. Number 90-102 Regent Street will then seek to set precedents for the ex-BP site, situated at 104-116 Regent St, (adjoining Margaret St and the Church). It would be duplicitous to try to deny this, and naive not to take this into account. The developers most pressing motivation is to maximise square meters without concern for any other consideration. Even in the heart of the city consideration is taken to make sure that the landscape does not become a series of featureless boxes depriving neighbours of all sunlight and presenting a bland, mass of concrete construction and wind tunnels. Buildings are stepped down to provide avenues for sunlight, disruption of wind tunnels and some difference and distinction for the eye. If one looks at areas destined for future development like the Parramatta Road Urban Growth Corridor, all corner sites on the blocks are required to be stepped down in height and future development tiered to create bulk transition with set-back for these very reasons.

We disagree with the posture that the proposal "*provides a high-quality interface with Regent Street*", we are disappointed that it does not refer to its interface with any existing development to the South and do not believe that the design is either complimentary to existing state significant buildings or that *the "podium respects the two-story character of Regent Street"*. Character implies difference and there is nothing different about the lines and pedigree of this structure. Although it is apparent that the developer believes that "*any view loss arising from the development is likely to be an acceptable impact.*" we must disagree vehemently with this stance.



(image 10) – Planning Lab’s cropped image, sans St Luke’s Church, indicating the disparity of current facades with ‘design’ parameters.



(image 11) – The uncropped image from the Planning Portal clearly demonstrates the overwhelming nature of the surrounding developments and their massive impacts on the design integrity and presence of St Luke’s Church.

We are uncertain why the applicant’s SEARS report crops the Church out of the Eastern Elevation (image 10) when, in part, its purpose is to compare the development with the existing streetscape development. We have included the full image from the planning portal for your own comparison (image 11).

In relation to the overall scale, bulk and size of the development the visual impact of the proposed development is substantially detrimental to the heritage of St Luke’s Church due to intended use, bulk, scale and destruction of remaining streetscape (image 7). Heritage significant properties such as St Luke’s Church go to the core of the history of the precinct and are part of the surrounding streetscape. Its values and those of the community of Redfern, need to be actively protected and preserved by the planning department through well considered whole environments (including surrounding developments, especially in relation to the context of the heritage building with regards to aesthetic and visual considerations of city planning).

The excessive bulk and scale of surrounding developments such as the applicants will be significantly detrimental to the aesthetic, visual prominence and significance of the heritage Church building and severely undermine the relationship of the Church to its surrounding built environment.

4. Issues with scale, bulk and size given the close proximity of site and locality to St Luke's Church

The development is too large in scale, bulk and size given its context and the immediate low scale surroundings of the site to its east and south and especially in consideration of its proximity to the heritage property St Luke's Church, a culturally and historically significant structure.

Historically, as acknowledged in the applicant's Statement of Heritage Impact, the surrounding context of St Luke's Church comprised of low rise commercial development (traditional 19th century two-story shopping strip) and residential terrace housing. The development proposes to remove another 4 buildings in their entirety, reducing the traditional face of the streetscape even further (image 10). Despite the applicant's previous Environmental Impact Statement (EIS) stating that a number of buildings have obtained or are proposing 18 storey buildings in the northern part of the precinct, it is essential to consider the immediate locality of the site wherein the applicant's proposal is situated. The site adjoins existing neighbouring low scale development, (i.e. the ex-BP service station at 104-116 Regent Street) and local heritage item, St Luke's Church, upon which the proposed development's impact will be significant and detrimental. One can quite clearly see the original face topography in (image 3), counting the facades you can even see the four, original, remaining frontages. If you look past you can see that at the time of this image the facades extended no further than the current 2 story structure at the former-BP site, with the bowser and awning area apparently empty, or, at least, not extending to the street.

From reviewing the placement and size of the floor plates for the proposed building, the building is clearly of unreasonably enormous bulk and scale to the detriment of the surrounding properties. Specifically in relation to its close proximity to the buildings along Regent Street, it is especially detrimental to the visual prominence required and impacts on the heritage significance of the church building for its occupants and the community.

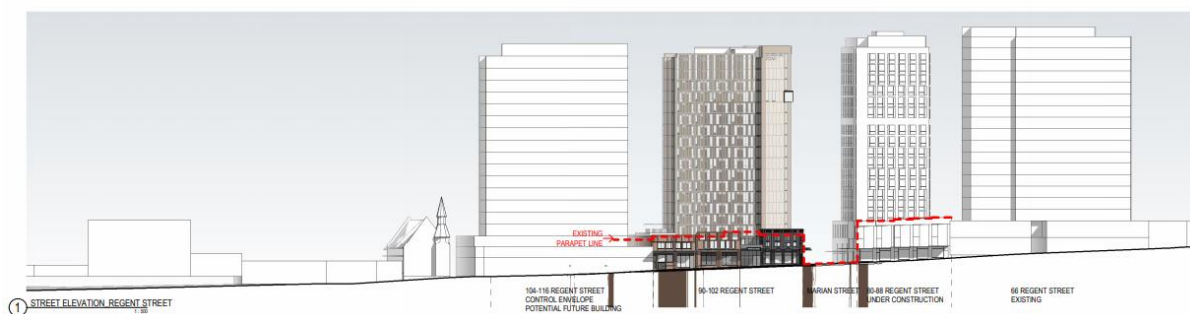
The proposed development is clearly too large with its mass imposing on St Luke's Church. Whilst an 18 storey building on an adjoining site (the former City of Sydney Council depot) may adjoin the applicant's site, a sensible and reasonable planning outcome should consider a more appropriate height, stepped, slender and re-shaped building for 190-102 Regent St. This would assist to bridge the impacts between the southern low scale development and northern high scale developments. In relation to the overall scale, bulk and size of the development, we submit that the proposed development sets a bad precedent for the adjoining site (104-116 Regent St), presenting all and more of the problematic issues noted in other developments nearby. We do not agree with the applicant's proposal which attempts to substantiate that the proposed development would be suitable to the context of the site. Nor do we feel that the proposed podium reinforces the existing two story character of Regent St but rather undermines it. This proposal clearly demonstrates the immense incompatibility in bulk and scale as well as visual impact on the heritage item - St Luke's Church (image 11 and image 13).

All the buildings together, (be they the same developer or not), present as one, singular, massive, bulk - dominating the entire area (images 11 and 12). It should not be overlooked that this site and the adjoining ex-BP site (the developer's next project) are bounded by very narrow 19th century lanes and streets. Neither site sits on a corner defined by broad thoroughfares (for example Broadway and Abercrombie Streets). This constriction of the streets includes footpaths which are rarely wider than half a metre or so on the side-streets. This narrow footway access only emphasises that the proposed development sits right to the very edges of the site, looming over roads, nearby buildings and the entire neighbourhood. Streets of the 19th century were never designed for such development, indeed with the technology of the times, they could not even be conceived of by the original planners. There must be more consideration of the development's impact and consideration of set-backs above for light, and below with wider, set-back foot-paths and thoroughfares for aesthetics and the safety of local inhabitants new and old.

There are a number of design elements that should be addressed, that are evident from the already completed, developments lacking character and overwhelming the blocks closer to the station as well as Regent's Streets southern historic and lesser developed buildings. In consideration of all of the above, we arduously advocate that the proposed development should be considerably reduced in scale and height with an accompanying reduction in mass and overshadowing to result in an improved planning outcome for this building and any future development between this development proposal and 118 Regent St, St Luke's Church.



(image 12) – The historic building (St Luke’s Church) facing a wave of proposed impending overdevelopment which presents as a one, singular, massive bulk, expanding to dominate the entire area, with an ever growing mass and bulk moving closer and closer towards the heritage property. Only sensible and reasonable planning will be able to mitigate the detriments and impacts from such overdevelopment, especially as the overwhelming bulk and scale of the developments are proposed to expand towards St Luke’s Church and over the historic Regent St streetscape. One can see no spatial relief by looking the current developments and the clear overdevelopment is an evident manifestation of a planning policy, process and past approvals that require complete reworking and reconsideration to be prevented from occurring again against the best interests of the Redfern township, community and locality. Significant attention and care must be taken to avoid this highly detrimental bulk and scale continuing to damage and impair Regent St, especially when approaching the low scale southern developments and St Luke’s Church.



(Image 13) – An extract from the applicant’s architectural plans showing the Regent St streetscape. The ‘104-116 Regent St Control Envelope Potential Future Building’ is highly alarming given that the site is owned by the applicant and that the architectural plans have referenced a building envelope that appears to have given no consideration whatsoever to St Luke’s Church. We vehemently submit that any reliance on a ‘potential future building envelope adjoining a heritage church with a complete disregard towards the heritage item should be completely dismissed and the proposed entirely re-evaluated in the context of likely and reasonable future development adjoining it along with appropriate consideration of heritage items such as St Luke’s Church in such close proximity to the Proposal. The enormous disparity between the overdeveloped northern side of Regent St and lower scale of development on the southern side of Regent St is also especially evident and undermines the relationship between the physical forms and built environment on Regent St and the Regent St streetscape.

Oversaturation of Student Accommodation in the Locality and Resultant Decrease in Amenity to the Locality and Surrounding Area arising from the Proposed Use

The proposed use of student accommodation results in a saturation of student accommodation with a considerable decrease in amenity, variety and the individual nature of the surrounding area through the increase in congestion and impact on heritage. It is not diverse enough, not in the spirit of the zoning or the The Sydney Local Environmental Plan which states an aim to “1.2 (2) (e) to encourage the growth and diversity of the residential population of the City of Sydney by providing for a range of appropriately located housing, including affordable housing,”. It can be argued that there is precious little diversity and too much growth when looking at this concentration of population. This development is a distinct example of over-servicing in a specialised and homogenous sector. A sector whose volatility has only been emphasised by the current Covid-19 crisis, it presents the possibility of devolving into a ghetto if struck by unexpected economic downturns and it degrades the family-style occupation and heritage of the area. In 2018, there were a record 548,000 international students at universities, vocational colleges, English colleges and schools in Australia. We only have to look at the recent exodus of students and the closure/retraction of education facilities due to Covid-19 to see how easily impacted this target market can be. The exodus of international students triggered by COVID-19,”cost Sydney’s economy \$2.5

billion as small businesses go quiet and rental properties remain empty” (SMH 10/11/20), with some businesses losing 70% of their custom within days. Apart from the impact on small businesses located in student intensive areas, Mitchell Institute data showed that “rental vacancy rates have increased by more than eight per cent in Kingsford, Kensington, Redfern, Chippendale, Macquarie Park, Pyrmont, Ultimo and by more than 12 per cent in the Haymarket area” (SMH 10/11/20). It is abundantly clear that putting all your eggs in one basket does not provide stable employment, growth or solid investment. The Sydney Local Environmental Plan aims to “1.2 (2) (i) to provide for a range of existing and future mixed-use centres and to promote the economic strength of those centres”. This overpopulation of a single, socio-economic & resident type does not provide any strength or resilience. It is not mixed or diverse and goes against the spirit of the plans and zoning for the area. It is a type of social stagnation that no one would wish to see in the vibrant Redfern precinct.

5. Construction and Vibration Impacts on St Luke’s Church

Concerns over the construction and vibration impact on the heritage former church property are valid and almost impossible to predict. We note that original stained glass windows (such as the prominent stained glass window in image 14 below) are delicate, easily damaged and the skill-set required to repair or replace them in many cases no longer exists. Over 150 years of history could be destroyed in an instant. Likewise slate roofing (which may already be detrimentally affected as mentioned in the overshadowing comments) can often be affected by vibrations and to locate matching slates is a nigh on impossible task. Once damaged, the building will struggle to present its originality and beauty in any manner approaching that of the past.



(Image 13) – Prominent stained glass window at front of St Luke’s Church which is extremely susceptible to construction and vibration impacts

Conclusion

In conclusion the Secretary's Environmental Assessment Requirements ask for *"An urban design analysis with consideration of the proposed building form, height, setbacks, bulk and scale in the context of the immediate locality, the wider area, street activation and the desired future character of the area, including views, vistas, open space, the public domain and connectivity."* We feel that the applicant's proposal fails to meet those clearly stated objectives.

As the applicant is the same for both 12-23 Gibbons St and the forthcoming 104-116 Regent St, perhaps we may seek such guidance from their previous Heritage Impact Statement which affirms that... *"The cumulative impact of ongoing development in the area, as designated for the Redfern Waterloo Growth Centre, should be considered in future assessments in the area to ensure impacts to heritage items are minimised where possible."* We simply ask that you take the applicant of the site (as well as the applicant of the 12-23 Gibbons St proposal and the owner of the former-BP site) at their word and ensure that such impacts to the heritage item, St Luke's Church are actually minimised. We see no such attempt in this proposal.

In response to the above recommendation and given the lack of necessary reduction in bulk, scale, size, visual impact, overshadowing, construction, the already prevalent saturation of student accommodation in the Redfern precinct and the overarching heritage concerns in the development proposal, we urge that the development proposal be refused by the Minister of Planning due to the development application's many detrimental impacts which would be created on the boundaries of the Redfern-Waterloo sites area and which would be specifically and immensely detrimental to St Luke's Church.

We welcome the opportunity to meet with you or your representative onsite to further explain our concerns and also welcome any necessary involvement in the process to further clarify these valid concerns. Please do not hesitate to contact me on 02 8596 2799 or via email to jm@rwnewtown.com.au to discuss further.

Yours sincerely,

Dimitrios, Anastasia, Anthony & Matthew Markakis
Directors of D & A Markakis Pty Ltd