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Our ref: MP06_0101 MOD 2 and SSD 8135

Mr Greg Colbran
Deicorp Ltd
Level 4, 161 Redfern Street
REDFERN NSW 2016

Dear Mr Colbran

**PEMULWUY PRECINCT 3, STUDENT ACCOMMODATION DEVELOPMENT
(MP 06_0101 MOD 2 AND SSD 8135)**

Exhibition of the above modification application and State significant development application ended on Friday 27 October 2017. All submissions received during the exhibition of the proposal are attached and available on the Department's website.

Having reviewed the submissions and considered the revised proposal, the Department requires further consideration be given to public benefits, heritage, the relationship with existing approvals and agreements, urban design and public domain, future amenity, transport and pedestrian movements, design excellence, view impacts and construction impacts.

These issues are further outlined in **Schedule 1**. Additional information and clarification is also required on a number of other matters outlined in **Schedule 2**.

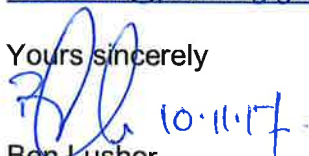
As part of the consideration of your response to issues raised, the Department recommends you undertake further consultation with the City of Sydney and the Heritage Division of the NSW Office of Environment and Heritage in relation to the issues raised in submissions provided by those agencies.

Please provide a written response to the Department's key issues and all issues raised in submissions, within three months of the date of this letter.

Please note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which you provide your response to submissions to the Department are not included in the deemed refusal period.

Your contact officer, Brian Kirk, can be contacted on 02 8275 1397 or via email at brian.kirk@planning.gov.au.

Yours sincerely



Ben Lusher

**Director
Key Sites Assessments**

SCHEDULE 1 – KEY ISSUES

Public benefits

1. The Department considers that further consideration and justification is required to demonstrate how the development provides for appropriate and commensurate public benefits. In particular, the Department recommends further consideration should be given to:
 - the requirements / contribution rates of the *Redfern-Waterloo Contributions Plan* and the *Redfern-Waterloo Affordable Housing Contributions Plan*
 - mechanisms to improve the access of Aboriginal and Torres Strait Islander students to affordable student accommodation on the site.

Heritage

2. The Department notes the concerns raised by the Heritage Division of the NSW Office of Environment and Heritage in its advice and recommends the following:
 - convening the Design Review Panel to review the advice of the Heritage Division and further consider the design of the proposed building in light of the concerns raised; and subsequently
 - undertaking further direct consultation with the Heritage Division in relation to the issues it has raised, including providing further information / amended plans for its further review and comment.

Evidence of the process set out above should be provided as part of any response. This should include further DRP minutes and advice, further advice and comments from the Heritage Division and how the proposal has responded to those issues.

Relationship to existing approvals and agreements

3. Please consider the relationship of the current applications with the existing site wide Project Approval (MP11_0093) in relation to:
 - the approved development on Precinct 3 within the Project Approval
 - the proposed relocation of the gallery to Precinct 1
 - the proposed deletion of the 'land-bridge' and reduction in public open space to be dedicated to Council, including any implications on existing agreements with Council.
4. Further justification should also be provided for the deletion of the 'land-bridge' from the proposal, including:
 - consideration of the reduction of public open space in the context of increasing density
 - the Design Review Panel's (DRP) view on the deletion of the land-bridge, including how the DRP's comment on the design of the 'Meeting Place' (comment 2.4.19 of Panel Meeting No.2) has been addressed in light of the proposed deletion of the land-bridge
 - the need for approval from other agencies, including TfNSW/Sydney Trains
 - the potential to relocate the existing art-wall and/or incorporate it into the land-bridge.

Urban design and public domain

5. Provide confirmation and justification for public domain areas to be dedicated to Council or to remain within the development site and how these will be managed.
6. Consideration should be given to improving street level activation and to increasing the level of surveillance. This could be achieved by relocating services to the rear of the building (south-east elevation) and locating active uses (e.g. the gym and meeting rooms) to the street elevation and increasing the glazing within the façade.

In addition, where services cannot be relocated to the rear of the building, consideration should be given to dividing up and dispersing street facing inactive uses with active uses to reduce the concentration of inactive uses in one location.

7. Further details should be provided of the treatment of the ground floor level public 'Meeting Place' at the southern tip of the site, including:
 - introducing additional soft landscaping elements
 - consideration of Crime Prevention Through Environmental Design
 - confirmation of the wind environment in this location, noting it is desirable for this space to be comfortable for pedestrians sitting.
8. A response to Council's comments on public art, including further engagement with Council on enhancing the Arts Strategy and public art provided within the development.
9. Consideration should be given to adding louvers to all the external plant room roofs.

Future amenity

10. Consideration should be given to improving the overall amenity of the student accommodation having regard to the guidelines for student accommodation contained within the Sydney Development Control Plan 2012. In particular:
 - internal communal spaces
 - laundry facilities
 - bicycle parking
 - private balconies
 - acoustic / ventilation treatments for rooms likely to be affected by noise from the rail corridor.
11. Wind tunnel testing is required to confirm the wind impacts of the proposed building and any required mitigation requirements to achieve acceptable safety and comfort levels around the building. In addition, clarification of tree planting to be used as wind mitigation should be provided.
12. Provide an updated Operational Management Plan addressing the:
 - complaints handling procedure
 - out of hours security, including confirmation of whether the building will have security / concierge present 24 hours a day.
13. Accessible student rooms should be relocated closer to the lifts.
14. Consideration should be given to the function and amenity provided by the landscaped courtyard on Level 17, in lieu of providing larger studio rooms (as provided on the levels below).
15. Confirmation is required of how the strip of land between the building and the railway corridor along the south-eastern boundary would be treated, and whether there is the potential to introduce soft landscaping.
16. Consideration should be given to adding (inaccessible) green roofs above the roof top plant level and either adding a green roof or communal open space area above the Level 9 roof adjacent to the railway corridor.

Transport and pedestrian movements

17. Provide a pedestrian footway capacity study, which:
 - analyses the existing pedestrian footpath carrying capacity within 100 metres of the site and include pedestrian count/survey(s) during peak periods
 - assesses the impact of the proposal on the surrounding pedestrian footways
 - includes recommendations and/or mitigation measures/upgrades and how these will be delivered, to accommodate the additional pedestrian traffic generated by the proposal.

18. Clarification should be provided on whether or not a drop-off zone (as shown on the architectural drawings) is proposed on Eveleigh Street. If a drop-off zone is proposed, the Traffic Impact Statement should be updated to provide an assessment including:
- justification for, and the principle purpose of, the drop-off zone
 - the hours of operation and frequency of use of the drop-off zone
 - dimensions of the drop-off zone, including the maximum size and type of expected vehicles
 - management of the drop-off zone. In particular, how the zone would be managed generally and during peak moving in/out time for students
 - impact on pedestrian movement, noting that when in use the drop-off zone would block the footway
 - confirm the ownership / authority in charge of the road / footway where the drop-off zone is proposed and whether the owner / authority has been consulted.
19. The Plan of Management should be updated to include consideration of how the moving in/out of students will be managed to prevent adverse impact on the local road and pedestrian network.
20. Confirm details and location of the proposed on-road bicycle route between Lawson and Abercrombie Street.

Design excellence

21. Consideration should be given mechanisms to ensure how design excellence will be retained throughout the project to construction completion.
22. Consideration should be given to achieving a Green Star (as built) rating for the development.

View impacts

23. Consideration is required of the potential view loss impacts detailed within the public submission prepared by Design Collaborative on behalf of apartments within 157 Redfern Street. A view impact assessment should be provided that considers Tenacity principles to provide an analysis of the impacts of the proposed development on views.

Construction impacts

24. Consideration should be given to providing additional measures to address noise exceedances during construction.

SCHEDULE 2 – ADDITIONAL INFORMATION

- Consideration should be given to amending the Concept Approval to include concept plan drawings, setting out the building envelopes and broad development parameters, rather than detailed architectural drawings currently provided within the Concept Approval.
- Confirm whether there are any changes proposed to the Conditions / Future Environment Assessment Requirements of the Concept Approval (MP 06_0101). If changes are proposed provide these as tracked changes.
- For ease of reference, update the Statement of Commitments to include proposed changes as tracked-changes.
- Provide an additional computer generated image looking along Caroline Street, from the intersection of Caroline and Abercrombie Streets.
- Confirm and provide justification for the proposed hours of construction, noting the Acoustic Report includes two different suggested hours of construction.

- Confirm the area of the inaccessible green roof at Level 2.
- Provide a physical material sample board.
- Provide 1:20 detailed sections of the façade describing all building and material components proposed.