

26 March 2009

Mr. Jason Perica

Executive Director Strategic Sites and Urban Renewal

Department of Planning

23-33 Bridge Street Sydney NSW 2000

Dear Mr. Perica:

Re: Major Project MP 06_0101

Aboriginal Housing Company Pemulwuy Project Eveleigh Street, Redfern

As requested I have responded to the issues raised in the Submission. I have received copies of:

1. 72 submissions supporting the application and proposal (+ 1 additional late letter)
2. 17 submissions objecting to the proposal
3. 5 submissions from the public agencies

In respect of the private submissions I have tabulated these issues in the categories of Management, Housing, Gym, Respite Centre and Cultural Centre in support and objection and where relevant provided a response and noted where issues are to be resolved by design amendment or condition.

In respect of the public submissions I have tabulated the issues raised by each agency and responded where appropriate.

Reference is made throughout this response to additional items which will be submitted to the department within the next week; The Public Domain Plan (Appendix A), The Circulation Plan (Appendix B), an addendum to the Statement of Commitments (Appendix C), and a Sketch Plan showing additional basement parking (Appendix D). These additional items are in response to the substantive issues arising out of the submissions.

Yours sincerely,



Peter Lonergan

Cracknell Lonergan Architects Pty Limited

Management of the AHC	
Objection	Response
AHC are unprepared or incapable of managing the development.	This is not a relevant comment. The capacity of an applicant to undertake a development is not a matter that a consent authority can or should take into account.
Existing stock was allowed to rundown, was inhabited by squatters and drug-dealers.	This is not a matter that a consent authority can or should take into account.
The project will never be completed and will be occupied by vagrants, squatters and other problems.	This is not a matter that a consent authority can or should take into account.
Inadequate consultation with the community.	The application details the consultation and the applicant commits to ongoing consultation.
Intimidating and violent community.	This is not a matter that a consent authority can or should take into account.
New buildings will not solve economic problems	This is not a matter that a consent authority can or should take into account.
Social programs lack credibility for efficacy in terms of reducing crime and antisocial behaviour	This is not a matter that a consent authority can or should take into account. The social plan is recognised internationally for its excellence and cultural appropriateness.
Application is undeveloped in it's current form to undertake successfully	The application is consistent with the staged nature of the 3A process.

Management of the AHC	
Support	Response
The application is a progressive move by the AHC with the support of Sydney University and City of Sydney Council	Noted. The application is the result of broad and extensive consultation and support over the last 8 to 10 years.
Visionary and tireless to create a new and vibrant redevelopment of the block is impressive	Noted.

Housing	
Objection	Response
Ghettoism and will only continue the existing social problems.	The proposal is for a mixed-use development with substantial residential housing dwellings, capable of being sold to individuals on individual titles.
Absence of “natural market forces” will lead to no respect for property.	There is no part of the application that details aspects of the project that could lead to this opinion.
Scale and overshadowing will adversely impact on Caroline Street.	The shadow diagrams clearly demonstrate no adverse over shadowing on Caroline Street.
Diagrams do not have street names.	The street names are well known and are on the plans.
Lack of underground parking or dedicated off street parking.	In response to this objection the applicant will provide an additional 36 spaces to the basements of residential buildings (6 spaces per building). This will be included in the addendum to the Statement of Commitments (Appendix C) and a sketch plan will be submitted (Appendix D)
Lack of surveillance in the locality.	Noted.
Will probono Architecture lead to best architectural and social outcomes (“the castle” on the corner is poor architectural design)	This is not a matter that a consent authority can or should take into account. The application should be judged on its merits regardless of the arrangements regarding the architect.
The concept plan ignores the commercial/ residential zoning.	The concept plans in consistent with the Redfern Waterloo Built Environment Plan.
Inadequate services for the significant support needs of prospective residents.	The project seeks to expand the range of human services already widely available in the Redfern area.
Poor planning to cluster ‘social housing’ (low cost), will lead to increase in the unemployed population	There are no clusters of low-cost housing or housing designed for an “unemployed population” in the proposal.
Six residential building are of high density and are incompatible with existing zoning and building form of surrounding area.	The proposed residential is not high density (0.82:1), which is less than the adjoining residential terrace houses.
Housing should not be at the Block	There is no such prohibition for the project and housing is specifically required by the mixed-use zoning that applies to the site.

Design provides havens for criminal activity	This is contrary to the assessment of the NSW Police.
Too dense and density increases during holiday periods, misguided and no evidence provided to indicate that properties will be managed and maintained.	The density (FSR) is less than the permissible residential floor space for the entire site. The issue of management is not a matter that a consent authority can or should take into account.

Housing	
Support	Response
Will benefit the Aboriginal community that lives there.	Noted.
Being a mixed development has commercial, cultural, education, retail and health facilities and residential components.	Noted.
Follows the fall of the land minimising height and bulk.	Noted.
Available to Aboriginal families with a mix of homeowners, mortgagees, low rental tenants following the social plan.	Noted.
The higher buildings commercial, cultural and recreational are placed on the eastern boundary providing a barrier to rail noise.	Noted. The placement of the commercial buildings are strategically determined through careful and considered planning to create a noise and pollution barrier to the east of the site separating the residential component of the project with the adjoining railway station. The rest of the commercial buildings are placed at the southern most end of the site toward Lawson Street reflecting the natural businesses of this intersection and creating a mini commercial hub in front of Redfern railway station's main entrance.
The gallery and performance space will create opportunity for international visitors to experience Indigenous culture to benefit Aboriginal Community.	Noted. The completion of the Pemulwuy project and in particular the proposed Art gallery and performances spaces are a critical component to the project.
Most residents and business community value the contribution of Aboriginal people to the area.	Noted.
A superb three-stage plan. The staging will	Noted. The proposed staging reflects the present

provide for A – the most urgent need; B – respite and modern health care; C – Art Gallery for artists and visitors.	need, and realistic commercial and economic financing possibilities.
Is a welcome addition to the Darlington Village.	Noted. The intention of the AHC is to make the Pemulwuy project an intrinsic part of the greater Redfern community.
Home ownership for Aboriginal families will set a valuable precedent.	Noted.
Will restore a strong and healthy indigenous community to Redfern with an emphasis on cultural values, spirituality and employment.	Noted. The proposed mixed use is supported allowing cultural and public uses to be developed for the community.
The project will contribute to the vision for appropriate redevelopment and rejuvenation.	Noted.
Employment and commercial opportunities to the resident Aboriginal people.	Noted. The Pemulwuy project will help generate economic growth for Redfern over the next 20 years.
The design has won an international award for crime prevention.	Noted. The Pemulwuy Project is designed to the design recommendations, contained within the social plan, for crime prevention.
Will help to create a viable and vital community.	Noted.
The site is important among other sites in Sydney for visitors.	Noted.
Innovative in terms of environmental sustainability.	Noted.
Approval would be consistent with Prime Minister Kevin Rudd's direction towards reconciliation.	Noted.
Staging will allow for careful monitoring and evaluation by government	Noted.
Will be a thriving extension to the CBD with a strong Aboriginal focus.	Noted. Sydney has numerous cultural precincts showcasing an exciting multicultural diversity.

Gym	
Objection	Response
Will not act as a community focal point for	There will be no such restriction.

existing non Aboriginal residents.	
Caroline Street will become a thoroughfare; restrict speed to 25km and parking to residents.	Caroline Street is already a through street; the speed limits are designated by Council. The applicant would support and make application for traffic calming including restriction of speed.
Caroline Lane will become a busy thoroughfare providing access to buildings and unsafe for residents.	Caroline Lane is already a through street. It will not be unsafe to residents but will improve safety and security.

Respite Facilities	
Objection	Response
Form of respite facility is not in keeping with style of Caroline Street terraces.	The building is designed to step at heights of adjoining terrace rows. Openings have been designed to reflect Georgian/Victorian periods design. The height is permissible.
Location of facility would tempt clients to become drug users.	There is nothing in the design that implies this conclusion.
A lot in Caroline street had to be specifically reconstructed as a terrace under Council's jurisdiction	The development in Caroline Street is at the end of the row of terraces. The controls under the Built Environment Plan specifically prohibit terrace building typology.

Respite Facilities	
Support	Response
Satisfy the long need for short term accommodation for Aboriginal people who come to Sydney for medical treatment.	Noted. Research in Aboriginal health highlights the need for affordable accommodation for families when accessing medical facilities.

Cultural Centre	
Support	Response
Great idea for locals and international guests	Noted. In particular The art gallery is an important component to the greater initiative for Redfern.

1. City of Sydney

Author: D. Hannam

1 – Sustainable Sydney 2030 Plan	
The document was not available in any form at the submission date nor is it relevant as it was not a referenced document in the Director Generals Requirement's issued at the accepting of the project application. However the issues raised are relevant and discussed.	
2 – Heritage and Urban Design	
2.1 – No reasonable master planning exercise, good design not demonstrated	The master planning process was undertaken at the project application stage and was acceptable and is documented at Part 5 of the Environmental Assessment.
2.2 – Peer review suggested	This is not a requirement of the Major Project SEPP but is noted. Will be added in the addendum to the Statement of Commitments (Appendix C)
2.3 – Removal of last characteristic terraces and does not interpret subdivision pattern. Should better reinforce principle (SIC) street patterns and alignments.	The existing 120 lots are not relevant to the proposal or the BEP, which anticipates consolidation of lots. The historic documentation and interpretative strategy will allow reading of this. Preparing an interpretive strategy will be added in the addendum to the Statement of Commitments (Appendix C)
2.4 – Demolition of historic Mundine Boxing Gym recommend interpretive strategy in place that interprets original location and be part of interpretation of whole site.	This is proposed. This will be added in the addendum to the Statement of Commitments (Appendix C)
2.5 – Supports siting of community and retail uses at the top end of the site.	Noted.
2.6 – Shielding housing from railway by commercial / gallery space is supported.	Noted.
2.7 – Design competition for Iconic Art Gallery	Not required by the statutory controls, however discussions could be held with the City Council on the appropriateness of a design competition.
2.8 – Stepped repeating housing form is well articulated and offers good environmental performance and open space. Detailed design development of street wall materials and roof forms to reinforce street definition and differentiate blocks.	Noted.

2.9 – Street side lower ground floor bedrooms	These are not below ground.
2.10 – Internal network needs to be carefully designed so as to be defensible.	The entrances to the dwellings will be secure and will service no more than ten households. Refer to the Circulation Plan (Appendix B).
3 – Site Planning and Built Form	
3.1 – Does not fully comply with height and FSR in Major Project SEPP amend 7. However is not considered of inappropriate bulk or scale. Compared to existing buildings.	Noted. The variances are marginal. The SEPP allows for variance and variances have been approved at North Eveleigh.
3.2 – No residential use in area F and excessive residential floor space in area D.	As acknowledged, sites along the rail line are not appropriate for residential use.
3.3 – More even distribution of residential and non residential use would contribute to a better planning outcome.	In this location mixed-use buildings with non-residential uses on the ground floor would not be appropriate. Given the constraints imposed by the rail line the proposed mix, and location of uses across the site, provides the best residential environment.
3.4 – Housing mix is supported and is responsible to the needs.	Noted.
3.5 – Separation distances in residential flat design code should be maintained.	Noted. The proposal complies.
<p>3.6 – The proposal falls short in a number of key areas.</p> <p>Insufficient ESD initiatives</p> <p>Substandard amenity</p> <p>Poor design quality</p> <p>Poor layout</p> <p>Poor orientation</p> <p>Poor cross ventilation etc.</p> <p>A SEPP 65 review should be undertaken and include an assessment of accessibility amenity and safety of the proposal.</p>	<p>An assessment against SEPP 65 is at part 3.4 of the Environmental Assessment and complies.</p> <p>The amenity is excellent.</p> <p>The design quality is excellent.</p> <p>The layout is excellent.</p> <p>All but 2 apartments face North.</p> <p>All units have cross ventilation.</p> <p>A SEPP 65 assessment has been done at Part 3.4.</p>
4 – Subdivision	
Subdivision would require separate application and issue of subdivision certificate under Part 4 A sec. 109J of the EP and A Act 1979	Strata subdivision will be sought in the Part 3A application subject to the issue of title once the construction is finalised.

5 – Traffic Impact	
5.1 – Restrictive on street parking	There are only 9 residential kerb crossings proposed, and an additional 6 emergency vehicle access points. Space is available for at least 36 on street parking spaces and is not restrictive.
5.2 – How will mixed parking use be policed Max allowed spaces is 173; 29 are proposed.	In response to this objection the applicant will commit to an additional 36 residential basement spaces utilising 6 of the 9 proposed residential kerb crossings. This will be included in the addendum to the Statement of Commitments (Appendix C) and a sketch plan will be provided (Appendix D)
5.3 – Car share spaces should be considered	Not proposed. This is a matter for Council or the provider (commercial) to consider. Space is available for at least 36 on street parking spaces and is not restrictive.
5.4 – Proof that shared zones meet RTA guidelines for shared zones	The extension of the shared zone is supported but the applicant recognises that this would be an issue for the City of Sydney Council traffic committee and not this application.
5.5 – Signalled crossing at Lawson Street would lead to car jacking and bricks being thrown at waiting vehicles, robberies.	The pedestrian activated traffic signals is supported but the applicant recognises this would be an issue for the City of Sydney Council traffic committee and not this application.
5.6 – Closure of Eveleigh Lane requires approval of Councils property unit and requires written application to city's traffic operation unit before referral to traffic committee.	The making of the concept application was agreed to by council, the applicant recognises this would be an issue for the City of Sydney Council traffic committee and not this application, and the negotiations are on going. This will be addressed in the addendum to the Statement of Commitments (Appendix C)
5.7 – No objection to realignment of Caroline Lane.	Noted.
5.8 – Eveleigh Street shared zone is contradictory but is not opposed. Application to traffic operations unit should be made.	Noted.
5.9 – 90 off street bike parking is proposed; provision for some in open public space is required.	Noted. Spaces in the public open space can be provided and will be added in the addendum to the Statement of Commitments (Appendix C).

6 – Open Space	
6.1 – Open space should be in accordance with open space acquisition guidelines contained in City’s open space and recreation needs study 2007.	It is not proposed that any open space owned by the applicant be acquired by COS.
6.2 – Open space dedication site required detailed landscape plans submitted to council for approval.	It is detailed appropriately, for the staged application, on the landscape proposal.
6.3 – Pemulwuy Park site should be upgraded	There is no park proposed at this part of the site.
6.4 – More detail needed on form and nature of public open space.	The information submitted is for a concept application. Refer to the Public Domain Plan and Circulation Plan (Appendix A and B)
6.5 – Potential public domain improvements for pedestrians and cyclists.	Noted.
7 – Loss of Open	
7.1 – Vacant site is used as a park / open space.	This is the site of the proposal and is privately owned land.
7.2 – Replacement of open space with private development will provide little or no public benefit.	The site is privately owned it is unreasonable to require that it be left vacant or developed into a public park.
7.3 – Removal of open space has impact on public access to open space and recreation.	The existing space is not ideal for recreation and is in close proximity to the space being developed for the public recreation.
7.4 – Open space allows stormwater infiltration.	The stormwater/ concept plan proposes sustainable management of stormwater noted at appendix 8 of the concept application.
7.5 – Great loss of open space. A design solution which provides a larger partition of public open space soft landscape and public benefit should be considered.	There is an excess of 50% of the site area proposed as open space, not including the public roads and adjoining public open space, and is adequate.
8 – Open Space (Red Square)	
8.1, 8.2, 8.3 – The design of public space does not take advantage of links to existing open space and creates fragments of small invisible open space which are isolated from each other.	The proposal links to the networks of open space in the vicinity. Refer to the Public Domain Plan (Appendix A)
8.4 – Open space should be revisited to ensure a network of open space for maximum effect and	The network of open space has been designed hierarchically.

usability for the whole community.	
8.5 – Red Square and the pedestrian priority area have little residential development.	Noted.
8.6 – Should be designed to encourage passive surveillance.	The development as a whole has been designed to provide sufficient passive surveillance.
8.7 – Limited residential units is of concern.	Noted.
8.8 – Should be reconsidered to ensure passive surveillance.	Noted.
8.9 – The large area proposed as pedestrian priority is of concern.	The pedestrian Priority already exists; The extension of the shared zone is supported but the applicant recognises that this would be an issue for the City of Sydney Council traffic committee and not this application. The applicant will commit to further negotiations and include this within the addendum to the Statement of Commitments (Appendix C)
9 – Public Domain	
9.1 – How will it be maintained?	The ‘public domain’ is either roads or the frontages of privately owned properties. Maintenance will be the responsibility of the respective owners of the properties. Refer to the Public Domain Plan (Appendix A)
9.2 – Upgrade surrounding street frontages.	These are not owned or controlled by the applicant nor are they part of the application.
9.3 – Does not specify finishes and should be detailed to the City’s standard details and specifications	This will be added in the addendum to the Statement of Commitments (Appendix C) Drawing CA15 details the concept materials and finishes.
9.5 – Public art needs to be detailed and should be incorporated into the public domain.	It will be detailed and developed by the artist. It all addresses the public domain.
9.6 – Footpaths should be a minimum of 2.5m wide and planted in accordance with City’s Street Tree Masterplan.	Noted. This will be added in the addendum to the Statement of Commitments (Appendix C)
10 – Private Landscape	
10.1 – Delineation between public and private open space is unclear and ambiguous.	It is not ambiguous; it is gated and secure.

10.2 – Creating potential safety issues resulting in seclusion and ownership issues.	This is incorrect. Refer to the Public Domain Plan and Circulation Plan (Appendix A and B)
10.3 – Design is heavily fragmented resulting in small unusable spaces; further detailed design is required to ensure P.O.S. is divided into lots that are functional.	All spaces are useable and functional; every apartment has from 20m2 of private open space.
11 – Staging	
Public domain open space and roadways should form part of Stage 1.	Noted. This will be added in the addendum to the Statement of Commitments (Appendix C)
12 – Owners consent	
Council has only consented to the submission of a concept plan no approval for road closure; reclassification sale or transfer of Council land has been approved.	Noted.
13 – Planning the new Social and Physical Context	
13.1 – The city Social Planning Document including the Social Plan 2006-2010 and the Redfern Waterloo Safety Plan should be used to inform development of DA's for the site.	Noted. This will be added in the addendum to the Statement of Commitments (Appendix C)
13.2 – Who will use the proposed facilities? Should be used by all people including high needs groups, older people, disabled, young people and children.	This is not relevant. The land is privately owned.
13.3 – Design for a diverse and inclusive city.	Noted. This is what is proposed.
13.4 – What will be the patterns and paths of activity, are they safe and accessible?	New patterns of activity will be encouraged. Refer to the Public Domain Plan (Appendix A)
14 – Safety	
14.1, 14.2 – Application of safer by design principles is essential.	Noted. This will be added in the addendum to the Statement of Commitments (Appendix C)
14.3 – Formal risk assessment in conjunction with NSW Police Services should be undertaken.	Noted. It has been.
14.4 – Link local unemployment opportunities on site.	This is not a reasonable proposal, nor is relevant to a planning application.
14.5 – Increase scale and diversity of activity within the area; adverse impact on access to public facilities and services in the precinct by all of the community.	This is of a general objective nature and does not seem to have been prepared as a specific comment following a detailed examination of the concept

	plan and extensive supporting documents. Refer to the Public Domain Plan (Appendix A)
14.6 – Specific issues relating to safety.	
Clarification of planned use and management of open public space.	The management of the parcel of private land, which will be accessible to the public, will be discussed with the City Council.
Dispersal of homeless, street drinkers and injecting drug users.	This is not a matter that a consent authority can or should take into account.
Injecting drug users sites and sharps waste management systems.	This is not a matter that a consent authority can or should take into account.
Health outreach vehicle location.	This is not a matter that a consent authority can or should take into account.
Safer pedestrian routes (Rail to Uni)	The site is not a direct route to the university. The proposed open space is designed to compliment the existing Council open space which provides access to the Council Community Centre.
Information and Consultation	This will be included in the addendum to the Statement of Commitments (Appendix C)
14.7 – Consultation with local support services.	This will be included in the addendum to the Statement of Commitments (Appendix C)
15 – Recreation	
15.1 – Community involvement in public domain development process (writing, drawing, painting, oral etc) approach and visioning exercises.	Noted.
15.2 – Need for active and passive recreation opportunity.	Noted.
15.3 – Playground facilities for early childhood 3-13 is needed featuring interactive water features.	The proposal will use existing neighbourhood facilities and the AHC's proposal will not replicate these existing services.
16 – Place Identity Cultural and Heritage	
16.1 – Creation of a unique city space that facilitates place attachment for residents, walkers and visitors is essential.	See answer to 14.5
16.2 – Ways of acknowledging the traditional owners of the land through the built environment and public	Noted.

domain should be explored.	
16.3 – Integration of Public Art and water features achieve unique cultural expression and a sense of space.	No water features are proposed. There is an extensive public art plan.
16.4 – Recognition of Non-indigenous social history including industrial history should be considered.	Its history will be adapted in an interpretative strategy. This will be included in the addendum to the Statement of Commitments (Appendix C)
17 – Accessibility and Legibility	
17.1 How is this maximised?	The site is located on a station to the multi-line Sydney railway system.
Range of transport models (improved public transport)	See answer 14.5
Young People	See answer 14.5
Legibility; identify and plan nodes, landmarks and paths.	See answer 14.5
Child friendly cities indicators provide a useful framework for ensuring spaces work for everyone.	See answer 14.5
18 – Diverse and adaptable housing	
18.1 – Housing that is universal in design and diverse is needed.	The residential component is developed from the Social plan.
18.2 – Culturally appropriate housing is required and should be applied to the design development.	The residential component is developed from the Social plan.
18.3 – Access to open space is a significant contributing design element to culturally appropriate housing for Aboriginal people. All buildings should have usable green roofs to address this need.	This is a simplistic assumption. All buildings do have access to open space.
19 – Childcare	
19.1 – Should be considered as part of the concept plan.	Noted. The proposed will use existing facilities.
20 – Community facilities	
20.1 – Provision of community facilities is supported.	Noted.
20.2 – Consultation and collaboration with the City on the design and programming of the space is required.	Noted.
20.4 – Provision of office space for programming and	Noted.

service delivery.	
20.5 – Locate community facilities to maximise access visibility use and safety.	Complies.
20.6 – Need for crisis accommodation should be explored.	It is not intended to provide crisis accommodation.
21 – Education and Training	
21.1 – Provision of employment and training opportunities to young people and Aboriginal people should be on explicit part of the renewal strategy.	This is a stated objective in the Redfern Waterloo Authority Built Environment Plan This is not a matter that a consent authority can or should take into account.

2. Redfern Waterloo Authority

1. Mix of community cultural and recreational facilities for Aboriginal residents and wider community.	
The proposal is supported	Noted.
Elders, gym, gallery are appropriate; there location and delivery is not ideal.	Located in consultation with the community.
Elders centre is too remote in terms of passive surveillance and activation	It is central (between Cleveland and Lawson Street).
Stage 1 delivers small components of non residential uses and concentration of residential uses contrary to BEP	The applicant commits to including the commercial building at the top of Area (D) as part of stage 1. This will be included in the addendum to the Statement of Commitments (Appendix C)
Community based buildings other than Gym and Elders Centre are to be provided at some undefined time.	Gym and Elders Centre are community facilities. The City Council has a multipurpose community centre next door and this is considered sufficient for the residential development. The Art Gallery is the only other Community Use building proposed within the proposal.
2. Enhanced employment uses and the mixed (use) character of the site.	
Commercial/ retail uses are supported but no guarantee of delivery time frames or that development would occur.	Staging will depend on commercial environment at the time of development. This is the concept plan stage. Issues regarding staging can be dealt with at the detailed project application stage.
Significant reliance on residential to provide true enterprise hub for the precinct.	The proposal is for more than half non-residential development.
Insufficient detail to formulate further opinion of the commercial uses.	Concept plan locates building forms. Like elsewhere, commercial uses may well change over time.
3. Facilitate the development of quality houses	
Proposal exceeds height and FSR.	Any exceedence is marginal and allowable under the controls.
Form bears no relationship to the existing form of development around the site.	The form conforms with the objectives of the controls applying to the site.
Living areas appear to be relatively small.	This is not correct.
The closing of public laneways reduces permeability	Existing laneway is a major security problem. The

and is not appropriate.	proposed residential development has been designed with considerable police input and has been specifically designed to reduce escape routes and increase surveillance.
4. Respect the existing residential and industrial character and built form of the site and provide an appropriate interface to surrounding development.	It is considered that the interface is acceptable.
The proposal has a four storey scale in much of the three story area and is inconsistent with the fine grain and scale of the surrounding terrace type development.	This is not correct. For a small portion of the buildings facing east and west, five percent of the façade, presents as four storeys.
5 – Provide a safe vibrant cohesive community	
Safety and passive surveillance is poor.	This is not correct. There has been Police input and support for design.
Lower level apartments are below natural ground level and offer little surveillance to street and provide concealment.	This is not correct.
Offer few windows to surrounding street and where provided provide light to wet areas and bedrooms.	This is not correct.
Access to apartments is via ramps and alleyways between buildings, providing spaces for concealment and robs the street of activity and address.	This is not correct. A variety of entrances are proposed.
The apartments do not address the street	This is not correct. A variety of entrances are proposed.
Introduce more laneways and add to safety issues and would reduce safety and passive surveillance.	This is not correct and Contrary to the police advice.
No commercial usage provided with the ground floor in Stage 1 of the proposal.	It is considered that the commercial use in this locality would not be viable and would create a security problem after hours. The gym facility and the commercial building in area D will be part of Stage 1.
6 – Ensure the provision of quality open space	
Open space should have address from more active uses to make it safe.	The gym opens out on the open space. Refer to the Public Domain Plan (Appendix A) for the whole precinct.

3. Railcorp

The applicant accepts the conditions and will include these within the addendum to the Statement of Commitments (Appendix C)

4. Sydney Water

The applicant accepts the conditions and will include these within the addendum to the Statement of Commitments (Appendix C)

5. Energy Australia

The applicant accepts that a new substation on site would be required.