

# **Pemulwuy Concept Approval (MP 06\_0101 MOD2), State Significant Development (SSD) application 8135, Pemulwuy Project Approval (MP11\_0089 MOD1)**

## **Objection from a local resident**

20 November 2018

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I've lived in Redfern for the past 8 years and currently reside on Caroline St. I know my disappointment with the Pemulwuy project and the process is felt by others in my community by the fact that 94% of the submissions to the Department opposed the project.<sup>1</sup>

The following pages detail why I object to the development. I make reference to the 18.10.2018 Assessment Report and other documents of interest. I've provided footnotes where necessary.

### **Shadowing**

On page 5 of the report "The Department's assessment concludes the increase in height of the Precinct 3 building ...from 8 to 24 storeys...would not have an adverse impact on amenity in terms of overshadowing, overlooking, impact on views".<sup>2</sup>

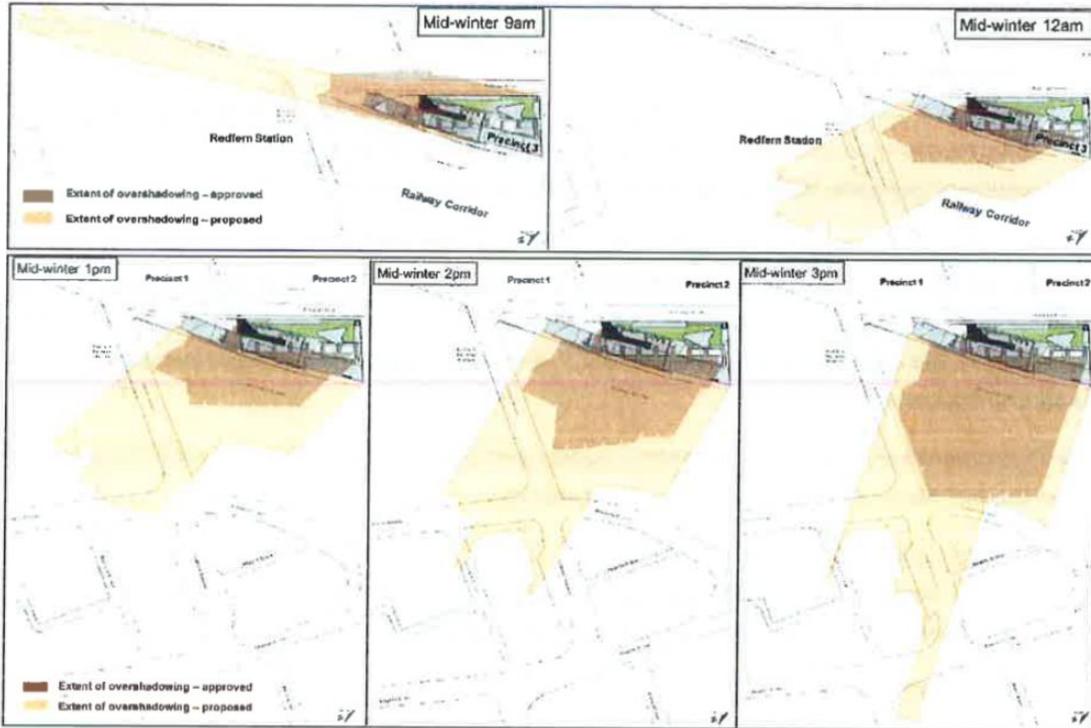
The report includes very low-quality shadowing impact illustrations to support this assertion (figure 19 - see below)<sup>3</sup>. At 9 am the illustration shows very long shadows stretching South over Little Eveleigh St. At midday the shadows move over onto the Eastern side of the station. Looking at these diagrams you would be forgiven for thinking Caroline St, Hugo St, Louis St, Eveleigh St, and Abercrombie St would not be impacted by any shadowing. Unfortunately, this is far from the truth and an example of the many distorted facts contained in the report.

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<sup>1</sup> As shown by the fact that 171 of the 183 submissions opposed the project in its current form. Page 70

<sup>2</sup> Page 5

<sup>3</sup> Page 54



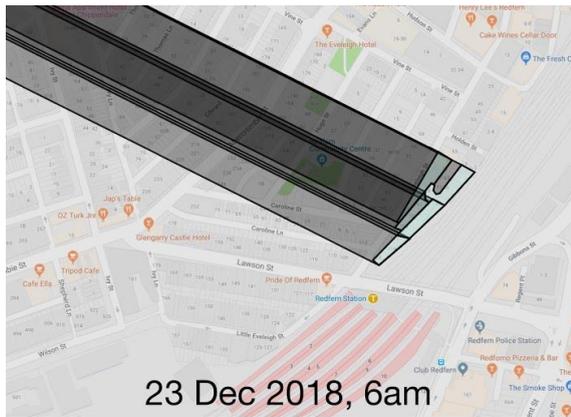
**Figure 19** | Overshadowing impact between 9 am and 3 pm in mid-winter (Base source: Applicant's RtS)

To distort the facts, the assessment report only includes mid-winter shadowing illustrations. This is a very deceptive time of year to illustrate the impacts of shadowing due to the angle of the sun.

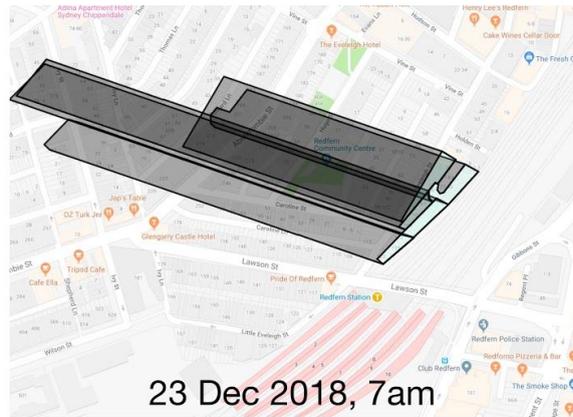
Using the proposed heights listed on table 17<sup>4</sup> I have generated shadowing visualisations<sup>5</sup> based in summertime 23rd December. These illustrations (below) present the devastating impact such a tall building will have on the natural light available to the nearby 2-storey terraces.'

<sup>4</sup> Page 61

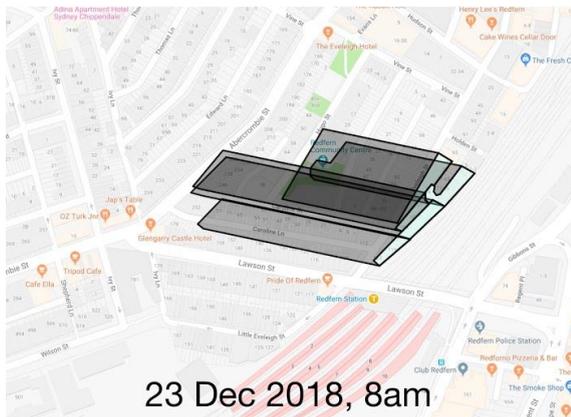
<sup>5</sup> Generated using <http://shadowcalculator.eu>



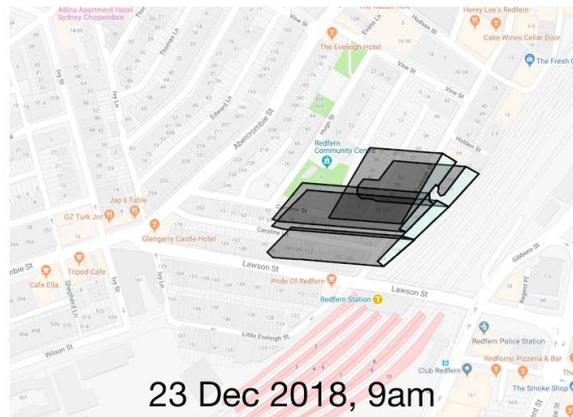
23 Dec 2018, 6am



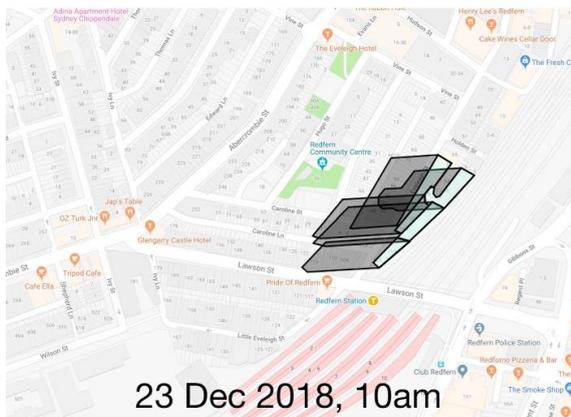
23 Dec 2018, 7am



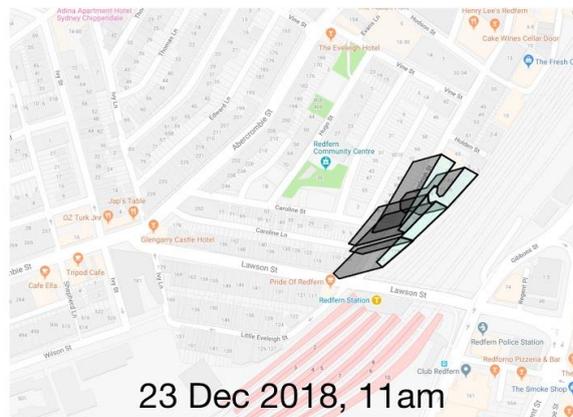
23 Dec 2018, 8am



23 Dec 2018, 9am



23 Dec 2018, 10am



23 Dec 2018, 11am

*Above: shadowing<sup>6</sup> west of Precinct 3 - 23rd December 2018*

Most of the residents on Caroline St, Hugo St, and Eveleigh St should expect to wake up, get dressed, eat breakfast and go to work with their houses covered in shadows by the 24-storey skyscraper.

The full impact of the shadowing on the neighbourhood can only be understood by also considering the nature of 1900's terraces that make up the majority of the buildings in the conservation area. These terraces are very narrow and long. They typically have a small window at the front of the house, a small window at the rear, and 1 window for each of the front and back bedrooms. Being terraces, most have shared walls, and as such no side windows. In short, such houses are already very dark, and the shadowing from a 24-storey

<sup>6</sup> Generated using <http://shadowcalculator.eu>

high rise will have devastating impacts on natural light, and ultimately the quality of life for the residents.



*Above: 35 Caroline St is a typical narrow terrace that will be covered in shadows and struggle to get enough natural light through its narrow doors and windows.*

Furthermore, as these terraces are located in a conservation area, the owners of these homes will not have the opportunity to make their windows bigger or change any of the facades to improve access to natural light.

### **Bulk and Height: Nearby 18-Storey Buildings**

How have the developers tried to convince the community, the City of Sydney, the Department of Planning, and you the IPC, that a building of such bulk and height in a low-density area is appropriate?

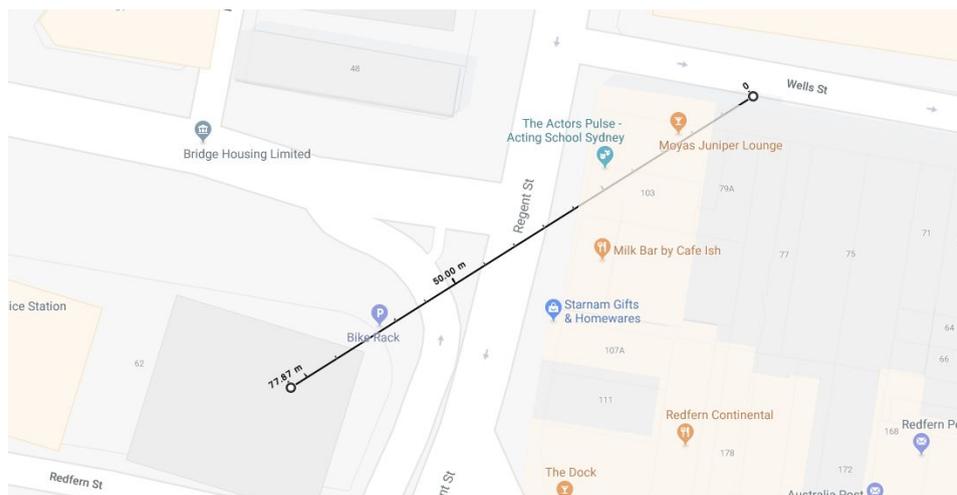
*“The Department acknowledges the Pemulwuy Precinct does not currently contain tall buildings and there are currently no tall buildings in this locality, on the eastern side of the railway corridor. However, on the eastern side of the railway corridor, approximately 100m to the south-east of the site, there are four existing (and one proposed) 18-storey high-density mixed-use developments”.*<sup>7</sup>

I think this justification for the bulk in height is one of the most egregious distortions of the truth. The eastern side of the railway tracks is a distinctly very different area in terms of road width, business zoning, traffic, and overall environment. Regent St and

Gibbons St are both 4 lane high traffic commercial roads, featuring a supermarket, bars, shops, apartments and offices.

In fact, I believe the nearest residential terrace to the 18-storey building at Lawson Square is 79 Wells St, roughly **77 metres away** (see below). This is very different from the proposed 24-storey student highrise being less than **20 metres** away from 2-storey terraces!

This should be considered with the fact that Wells St has mixed-zoning being home to the Tram and Rail Union building and a bar, so is not directly comparable to the quiet residential conservation area surrounding Pemulwuy.



*Above: It is around 77 metres from the 18-storey building at 1 Lawson Square to the nearest residential terrace at 79 Wells St. Very different from what is being proposed.*



*Above: 79 Wells St looking west towards 1 Lawson Square.*



*Above: The hustle and bustle of Lawson Square (top) contrasted against the quiet low-density conservation area around Caroline St (bottom).*

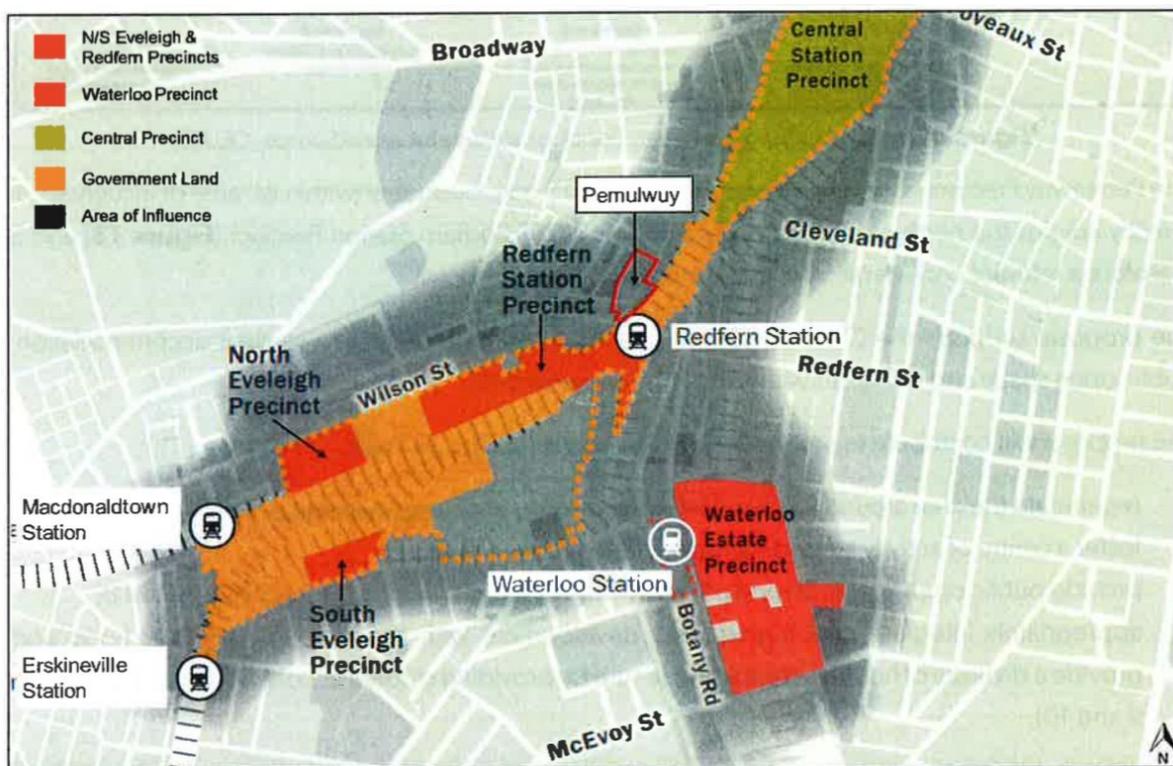
In the above, I have detailed why the 18-storey buildings around Lawson Square are not a sound comparison to the proposed 24-storey building at precinct 3. Furthermore, such a fraudulent comparison still fails to justify why the precinct 3 building deserves to be taller than the buildings at Lawson Square.

### **Bulk and Height: Central to Eveleigh Transformation Strategy**

The assessment report also draws on the Central to Eveleigh Transformation Strategy as justification for the bulk, height of the proposed precinct 3.

*“The Central to Eveleigh Transformation Strategy (CEUTS) guides the renewal of approximately 50 hectares of government-owned land in and around the rail corridor from Central to Erskineville stations”<sup>8</sup>*

However, damningly the proposed precinct 3 building is **outside** the CEUTS<sup>9</sup>, and inexplicably, 8-storeys higher than the buildings that are in the zone! On this basis, the report again fails to justify why a 24-storey highrise at precinct 3 has any merit for consideration.



**Figure 13** | Central to Eveleigh Urban Transformation precinct plan (the corridor boundary outlined in orange dashed line) (Base source: Central to Eveleigh Urban Transformation Strategy)

<sup>8</sup> Page 25

<sup>9</sup> Page 25

## ‘Subsidised’ student accommodation for Aboriginal students

The report mentions precinct 3 will:

*“Provide of 110 beds within the student accommodation made available for ATSI students at subsidised rates”<sup>10</sup>*

Worryingly, at the IPC meeting with the Applicant (13 Nov 2018), Ms Tutuila contradicted this promise of 110 beds by commenting *“For indigenous students, 100 beds.”*

Furthermore, the report fails to mention the rate of subsidy, what styles of accommodation the 110 beds will be, nor any commitment to the 99-year timeframe. Within precinct three, 233 beds are proposed to be studio apartments, 74 twin rooms, and 43 5-bedroom cluster units.<sup>11</sup> Will Atira or the AHC commit to providing details on what type of accommodation will be made available at subsidised rates?

The rate of subsidy is also a very important missing piece of information. Atira accommodation fees are prohibitively expensive, far exceeding the market price for similar private rentals. For example, a studio in Atira’s Melbourne La Trobe street is **\$519** a week!<sup>12</sup> This compares very poorly to a **modern 2-bedroom apartment** on the same La Trobe St that is currently available for rent for \$520<sup>13</sup>. I estimate the rate of subsidy will need to be upwards of 60-70% to make it an attractive offer for disadvantaged students applying through the AHC.

Another unanswered question is how will the subsidised student accommodation be guaranteed during the 99-year lease? What happens if Atira sells the business to another student accommodation provider? What happens if there are not 110 Aboriginal students interested in the offer (which may not be attractive)?

## International students and car ownership

*“Well, you know, you are looking at international students in the main being housed there, and students generally don’t own cars.”*

- ANDY LUDVIK, IPC Meeting with Applicant, 13 Nov 2018,

The assumption the students will not be driving cars is the key argument for Precinct 3 having no car parking, and the traffic modelling provided. One thing is for sure, the international students who can afford to pay at the Atira’s exorbitantly high fees will not be struggling students. So while statements stating “students generally don’t own cars” may be true for the average local student, the same cannot be assumed for the well-heeled residents of Atira properties. A separate study looking at International students who stay at

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<sup>10</sup> Page 19

<sup>11</sup> Page 19

<sup>12</sup> <https://atira.com/room/la-trobe-st/studio-premier-3/>

<sup>13</sup> <https://www.domain.com.au/2203-315-latrobe-street-melbourne-vic-3000-12681413>

commercial student housing and car ownership needs to be conducted to confirm that these students will not be buying cars and parking in the neighbouring streets. To not conduct such research is to dangerously rely on hearsay and baseless assumptions.

## **Pedestrians and Traffic**

The report states *“The proposal would not result in adverse traffic or car parking impacts.”* And *“The proposal would not generate additional pedestrian footpath movements that would exceed footpath capacity surrounding the site.”*<sup>14</sup>

This perplexing conclusion appears to be very ill-informed. Both Lawson St and Caroline St are unable to deal with the existing pedestrian traffic, let alone any increase. I often witness pedestrians on Caroline St being forced to walk on the road as the footpaths are of inadequate width. Telegraph poles and bins block the already narrow footpaths. Pedestrians, especially those with prams and in wheelchairs already have no choice but to use the road.



*Above: Usable footpath width of 75cm LHS looking East along Caroline St.*



*Above: Usable footpath width of 54cm RHS looking East along Caroline St. The bins cannot be relocated as the houses on Caroline St do not have a front porch, and most do not have rear-lane access.*

Table 18 of the report states that the pedestrian traffic will increase in Caroline Street by a factor of 1000% (10x). Curiously it claims this “*will not cause an exceedance in comfort levels for pedestrian routes...*”<sup>15</sup>

Contradictorily, the report notes there is no proposal to do anything about the paths nor the roads. It is completely baffling as to how these already inadequate footpaths can be deemed suitable for a 10-fold increase in foot traffic. This proposal is setting up a very dangerous situation where pedestrians will have no choice but to share the road with an dramatic increase in car traffic. This lack of insight highlights just how flawed this project really is.

## **Conclusion**

All the neighbours I have spoken to are outraged at the deceit and destruction this project represents to our community. Neither AHC or Deicorp have adequately consulted with the community regarding this massive departure from the original proposal.

Furthermore, as has been recently covered in the media, AHC is **not a registered affordable housing provider** and is ultimately not obligated to provide affordable housing for Aboriginal and Torres Strait Islander peoples. It also does not have the trust or the

support of the local community. Providing aboriginal housing in the area is extremely important, and should be the primary focus of any development in the area. However, AHC's latest plans are littered with way too many compromises, flaws, and trade-offs for it to enjoy community support.

**I urged the IPC to oppose this proposal.**