

218001
23 July 2019

Stephen O'Connor
Panel Chair
NSW Independent Planning Commission
Level 3, 201 Elizabeth Street
SYDNEY, NSW, 2000

Dear Mr O'Connor,

State Significant Development Application SSD 9275 – Additional Information 80-88 Regent Street, Redfern

We write on behalf of Iglu No. 209 Pty Limited (Iglu) in relation to SSD 9275 at 80-88 Regent Street, Redfern (the site). We thank the NSW Independent Planning Commission (IPC) for the opportunity to discuss the proposed development of a new student accommodation facility at the site. Following on from our meeting on Monday 22 July 2019 we have set out the conditions proposed to be amended and included additional information requested by the Commission.

1.0 Proposed Amendments to Conditions

As noted in our meeting, should the application be approved Iglu intends to move quickly to appoint a contractor in August 2019 to ensure that the proposed student accommodation can be completed no later than February 2021. Achieving this timeframe is critical to ensure that the facility is operational in time for the commencement of the 2021 academic year when students are seeking accommodation. In order to achieve this, Iglu has already commenced preparation of some post-approval documentation required by the draft conditions in order to allow it to satisfy the anticipated conditions in a timely manner. In order to assist in meeting this timeframe, it is proposed that Conditions C4 and C10 be amended to allow a reduced period of document submission and notice only where this is agreed by the Department.

For absolute clarity, Iglu is committed to undertaking a Compliance Monitoring and Reporting Program and a Community Communication Strategy however Iglu is seeking to expedite the notification date for the commencement of construction in order to support their current program. The Department will retain the ability to require the full notice period to be served if this is deemed necessary.

The following sections outline proposed amendments to the conditions that were raised in the meeting. Words proposed to be deleted are shown in ~~bold strike through~~ and words to be inserted are shown in **bold italics**.

- C4** No later than 6 weeks before the date notified for the commencement of construction, **or a reduced timeframe agreed by the Secretary**, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department.
- C10** The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than one month before the commencement of any work, **or a reduced timeframe agreed by the Secretary**.

It is also noted, that the condition cross referencing within draft Condition B14 and B15 should be amended.

2.0 Further Clarification and Responses

2.1 Wind Comfort Criteria

The Commission has requested clarification on the pedestrian comfort criteria used to determine the appropriateness of the full spanning awning along Marian Street as wind mitigation feature. This was on the basis that students and tenants may stand outside the Marian Street entry when waiting for transportation.

The Wind Impact Assessment prepared by Windtech dated 23 August 2018 has referenced two wind comfort standards including a standing criterion of 6m/s and a walking criterion of 8m/s. For the purposes of the assessment, the walking criterion has been adopted at the Marian Street frontage, including at Point 6 which is directly outside the Marian Street entry as illustrated at **Figure 1**. Point 6 complies comfortably with this criterion as illustrated in **Figure 2**. The use of the walking criteria is appropriate as Point 6 is located within Marian Street which is a pedestrian thoroughfare within the public domain and is not intended to be the primary entrance to the proposed facility that may act as an area of congregation. Rather, the existing entrance to the Iglu building at 60-78 Regent Street will act as the main point of arrival/departure for both buildings. During windy periods, residents and their guests could make use of the covered area and internal lobby area at ground level if they were waiting in order to obtain comfort from the wind conditions.

Notwithstanding the above, wind testing prior to the inclusion of an awning confirmed that at Point 6 the standing criterion would be exceeded. However, Windtech has advised that with the inclusion of the awning, the standing criterion would also be complied with.

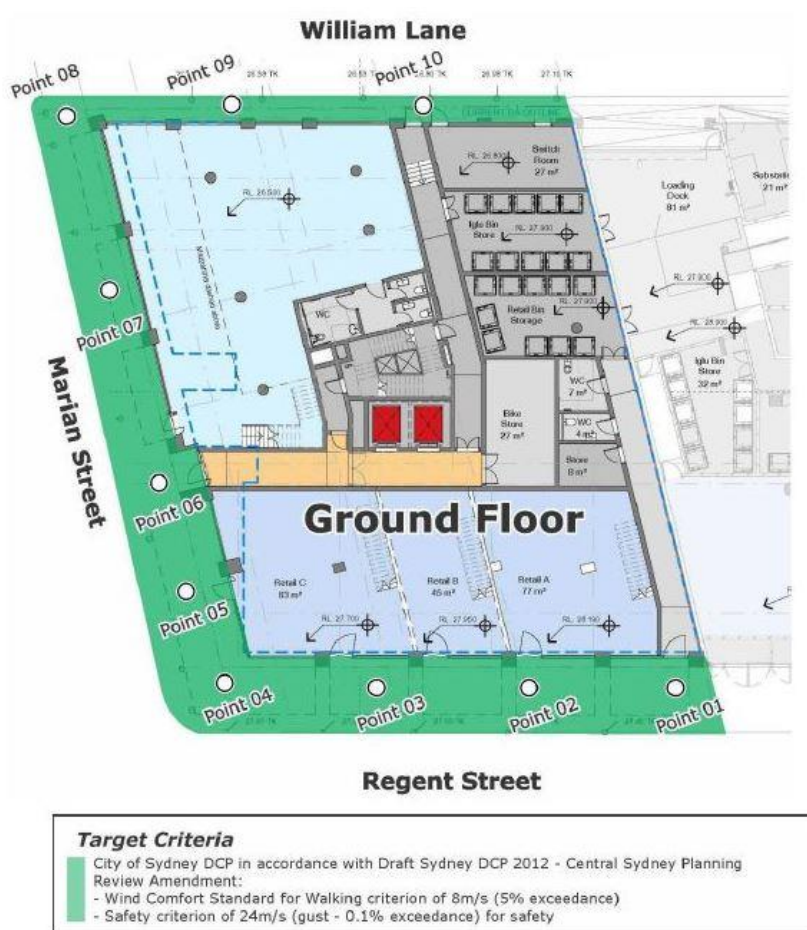


Figure 1 Study Point Locations and Target Wind Speed Criteria - Ground Floor

Source: Windtech

Table 5: Wind Tunnel Results Summary

Study Point	GEM (5% exceedance)			Annual Gust			Final Result	Description of Treatment
	Criterion (m/s)	Results (%)	Grade	Criterion (m/s)	Results (m/s)	Grade		
Point 06	8.0	2%	Pass	24	17	Pass	Pass	

Figure 2 Wind Tunnel Results for Point 6

Source: Windtech

2.2 Site Integration

As noted at the meeting, the proposed development has been designed to operate as an integrated facility with the existing Iglu development to the north. The proposed development has not been designed to operate in isolation. For commercial reasons it is not proposed to consolidate the Subject Site and 60-78 Regent Street into a single title, but rather it is intended that the five lots that comprise the Subject Site will be consolidated and that appropriate easements and covenants would be put in place on the titles of the Subject Site and 60-78 Regent Street in order to provide for the operation of the two sites as a united facility. To this effect, Iglu would not object to the imposition of the following conditions to ensure that this occurs:

Consolidation of Subject Site

Prior to the issue of an Occupation Certificate, Lots A-E in Deposited Plan 105824 are to be consolidated into a single title.

Restrictions on Title

Prior to the issue of an Occupation Certificate, the applicant is to demonstrate that appropriate restrictions on title have been placed on the Subject Site and on Lot 1 in Deposited Plan 1243996 to provide for:

- *Easements for access by residents of each lot to all communal student facilities, including the existing communal areas at Level 1 of 60-78 Regent Street and the proposed communal facilities at Level 1 and Level 17 of the Subject Site.*
- *Easements for access across Ground Level and Level 1 of 60-78 Regent Street for the benefit of the Subject Site.*
- *Easements benefitting the Subject Site for use of the existing loading dock at 60-78 Regent Street.*
- *Easements for any shared utility services including telecommunications, electricity, water, sewage and the like.*
- *Restrictive covenant that requires the use of the Subject Site for the purpose of student accommodation to be ceased should the use of 60-78 Regent Street for the purpose of student accommodation cease.*

2.3 Laundry Facilities

Further to the matters raised in relation to the provision of laundry facilities, we direct the Commission to **Section 2.1** of the Response to Submissions Letter prepared by Ethos Urban dated 24 January 2019 where a detailed response is provided including details of the operation of existing Iglu facilities, comparable third-party student accommodation facilities and management measures employed by Iglu including technological measures to maximise convenience and efficiency for students.

3.0 Conclusion

We trust that the above information provides the Commission with sufficient information to determine the application. Should you have any queries about this matter, or require any further additional information, please do not hesitate to contact me on 02 9956 6962 or at lfeltis@ethosurban.com.au.

Yours sincerely,



Luke Feltis
Senior Urbanist, Planning

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Michael Oliver
Associate Director

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