

**ITEM 10 REDFERN WATERLOO AUTHORITY DRAFT BUILT ENVIRONMENT PLAN - DRAFT SUBMISSION OF THE CITY OF SYDNEY**

**FILE NO: S033710**

**SUMMARY**

This report recommends that the Council endorse the Draft Submission (at **Attachment A**) for lodgement with the Redfern-Waterloo Authority as the City's response to their *Draft Built Environment Plan*. The *Draft Built Environment Plan* is intended to work with the *Employment and Enterprise Plan* and the *Human Services Plan* to revitalise the Redfern-Waterloo area.

The City supports the intention to revitalise these areas and intends to work with the Redfern-Waterloo Authority to this end, however the submission recommends deferral of the *Draft Built Environment Plan* until further research and investigation of a number of key matters (not currently addressed in the Draft Plan) is complete. These include undertaking further heritage and urban design assessments with a view to reducing proposed building heights, establishing inter-Governmental liaison structures to deliver the revitalisation and undertaking a number of key tasks identified in the Draft Plan itself (such as preparing a Section 94 Plan, an Affordable Housing Strategy and a Public Domain Plan).

The present form and content of the Draft Plan and Draft SEPP includes significant future building heights and development densities that may compromise the amenity of both existing and future development in Redfern. There is also a lack of certainty as to whether future development will be accompanied by the infrastructure required to support the redevelopment proposed by the Draft Plan and Draft SEPP.

**RECOMMENDATION**

It is resolved that Council endorse the Draft Submission at **Attachment A** to the subject report, for lodgement with the Redfern-Waterloo Authority as the Council of the City of Sydney's response to the Redfern-Waterloo Authority's *Draft Built Environment Plan*.

**ATTACHMENTS**

**Attachment A:** Lord Mayoral Minute, endorsed by Council on 27 February 2006

**Attachment B:** Draft Submission in response to the Redfern-Waterloo Authority's *Draft Built Environment Plan*

## BACKGROUND

1. The Redfern-Waterloo Authority (RWA) was established in 2005 to plan for and to deliver the revitalisation of these suburbs. The RWA has since developed three documents to guide the revitalisation of the areas. These are:
  - (a) *The Human Services Plan – to improve quality and delivery of human services;*
  - (b) *The Employment and Enterprise Plan – creating jobs and training opportunities; and*
  - (c) *The Built Environment Plan – improve the physical environment and provide more opportunities for housing and businesses, supported by improved transport, access and infrastructure.*
2. The *Draft Built Environment Plan* (the Draft Plan) was recently released for public comment. The Draft Plan focuses on the redevelopment of eight (8) Strategic Sites within the wider Redfern-Waterloo area, being:
  - (a) Australian Technology Park (ATP);
  - (b) North Eveleigh;
  - (c) South Eveleigh;
  - (d) Eveleigh Street;
  - (e) Redfern Railway Station, Gibbons and Regent Streets;
  - (f) Former Rachel Forster Hospital;
  - (g) Former Local Court House and Redfern Police Station; and
  - (h) Former Redfern Public School.
3. The Draft Plan includes preliminary masterplanning for the future of each of these sites, including the establishment of proposed height limits, floor space ratios (FSRs) and zonings. Amendments are proposed to the *State Environmental Planning Policy (Major Projects)* (Draft SEPP) to enable the redevelopment of these sites. The Draft SEPP is also on public exhibition.
4. The Draft Plan notes two key areas for which further work will be undertaken. One is a series of *Future Key Tasks* and includes completing a Public Domain Plan, Section 94 Plan and an Affordable Housing Strategy. The second is the revitalisation of the extensive public housing in the area. The Draft Plan gives the commitment that there will be no reduction in housing stock.
5. On 27 February 2006 the Council considered a Minute by the Lord Mayor, which acknowledged the need to revitalise the area, however it raised a number of issues presented in the Draft Plan. The Minute was endorsed by the Council (a copy is **Attachment A** to this report) and its recommendations are that:

- (a) *a report on Stage One of the draft Redfern Waterloo Authority Built Environment Plan and draft State Environmental Planning Policy (Major Projects) Amendment (Redfern-Waterloo) Policy 2006 be prepared for the Planning, Development and Transport Committee;*
- (b) *the report include draft submissions on the draft Built Environment Plan and the Draft State Environmental Planning Policy; addressing:*
  - (i) *any inconsistency between the City's planning controls and policy objectives and the draft Built Environment Plan and draft State Environmental Planning Policy;*
  - (ii) *the likely impact on urban and residential amenity of the draft Built Environment Plan and the draft State Environmental Planning Policy;*
  - (iii) *the possible impact of the draft Built Environment Plan and the draft State Environmental Planning Policy on the implementation of the draft City of Sydney Social Plan and particularly the Action Plan for aboriginal people;*
  - (iv) *the social, cultural and amenity impacts of the proposed land use controls for the Eveleigh Street precinct;*
  - (v) *factors that may inhibit the realisation of the Built Environment Plan and in particular, in public domain, transport, heritage, infrastructure, utilities and urban design strategies; and*
  - (vi) *recommendations for supporting positive aspects and for addressing identified limitations in the draft Built Environment Plan and State Environmental Planning Policy.*

## **KEY IMPLICATIONS**

6. The City of Sydney supports the RWA's aim of revitalising the Redfern-Waterloo area. The strategic direction of the revitalisation is also supported, with the three plans representing a cohesive social, economic and environmental approach to the future of the area and specifically, the Strategic Sites.
7. General issues and comments regarding the Draft Plan and Draft SEPP are in Part One of the Draft Submission at **Attachment A**. Comments specific to each of the Strategic Sites are made within Part Two of the Draft Submission at **Attachment A**.
8. In summary, the present form and content of the Draft Plan and Draft SEPP includes significant future building heights and development densities that may compromise the amenity of both existing and future development in Redfern. There is also a lack of certainty as to whether future development will be accompanied by the infrastructure required to support the redevelopment proposed by the Draft Plan and Draft SEPP.
9. The Draft Submission makes a number of recommendations in relation to the advancement of the Draft Plan and Draft SEPP. A summary of these recommendations is following:

- (a) **The City strongly recommends that the Draft Plan and Draft SEPP be deferred until the myriad of further investigations that will both lead and support the redevelopment of the strategic sites are complete.**
- (b) These investigations go beyond the “Future Key Tasks” identified in the Draft Plan and include:
- (i) **Traffic and Transport:** prepare a traffic and transport analysis and plan;
  - (ii) **Redfern Railway Station:** resolve the future of this important area, initially through providing advice as to whether the proposed upgrade deals with rail capacity, development potential, or both;
  - (iii) **Public Domain and Open Space:** develop a public domain strategy and an open space strategy, to ensure high quality, safe accessible public spaces;
  - (iv) **Affordable Housing:** develop an affordable housing strategy;
  - (v) **Developer Contributions:** prepare a needs assessment and resultant Section 94 Plan;
  - (vi) **Urban Design – Views:** undertake a view corridor analysis for local and regional views;
  - (vii) **Heritage:** commence a heritage review, which will need to follow through into a detailed heritage impact analysis for each of the Strategic Sites;
  - (viii) **Urban Design – Height and Density:** review height limits and densities with a view to a general reduction across the Strategic Sites, so that other important matters such as retention of heritage may be dealt with in a more harmonious manner and so that residential amenity for existing residents is better protected;
  - (ix) **Stage 2:** establish protocols and communication channels in advance of the Stage 2 work, recognising the public housing tenants as partners to the process of revitalisation, and to plan ahead so as to minimise displacement and disruption to the lives of public housing tenants;
  - (x) **Consultation – “The Block”:** continue to consult with the Aboriginal Housing Company regarding the future of “The Block”;
  - (xi) **Consultation – General:** continue a programme of consultation with local businesses and the local residential community;
  - (xii) **Implementation Plan:** develop an implementation plan to coordinate the delivery of the three separate RWA Plans – this plan would address areas of overlap between the three RWA Plans and work prepared by the City, for example: job creation programmes for local people and the staging of such programmes through the realisation of floorspace in developing the Strategic Sites;

- (xiii) **Project Control Group:** the expansion of the scope of the Project Control Group proposed between RailCorp and RWA to include the City of Sydney and the Roads and Traffic Authority (RTA) is recommended, so as to deal with traffic and transport issues holistically; and
  - (xiv) **Inter-Governmental coordination:** must exist between Government stakeholders to achieve successful, staged redevelopment of Government land and to resolve related issues such as traffic and transport.
10. It is likely that this work will result in information that alters the Draft Plan and Draft SEPP, hence the recommendation of deferral.
  11. **Should the Draft Plan and the Draft SEPP proceed without the above investigations being undertaken/completed, the City recommends that the Draft SEPP be reconfigured to stage the release of the Strategic Sites, such that sites are gradually released to the market for development, enabling the deferral of some of the more complex sites until the above investigations are complete.**

#### **Lord Mayoral Minute**

12. Following is consideration of the recommendations of the Lord Mayoral Minute, which were outlined earlier in this report. A copy of the Minute is **Attachment A** to this report.
13. **Inconsistencies between the Draft Plan and the City's planning controls:** with a number of the Strategic Sites zoned "Special Uses" by *South Sydney Local Environmental Plan 1998*, sites such as North Eveleigh, South Eveleigh and the former Courthouse, Public School and Rachel Forster Hospital do not currently have detailed planning controls to guide their redevelopment. The City is reviewing the existing planning controls for the Redfern-Waterloo area, given that it has been some time since the existing height limits and floor space ratios in the area have received a detailed review to test their appropriateness.
14. The main concern for the City is the interface between Strategic Sites and the land that we plan for – specifically, that the proposed building heights in the Draft Plan do not appear to respect the existing scale and character of Redfern, nor do they offer retention or protection of residential amenity and sunlight access for land that adjoin is are adjacent to the Strategic Sites. This issue is discussed in more detail in the Draft Submission at **Attachment B**.
15. **Impact on urban and residential amenity of the Draft Plan and Draft SEPP:** as commented above, the impact of the Draft Plan and the Draft SEPP will be considerable if the proposed building heights are retained. The building heights proposed across the majority of Strategic Sites are not consistent with the existing character and scale of development in Redfern and they will not result in adequate levels of sunlight access and privacy to adjoining and adjacent residences. The approach to heritage in the Draft Plan is also questioned as it appears to condone the removal of heritage items despite the very high levels of significance existing in areas such as the Eveleigh Rail Yards.

16. The possible impact of the Draft Plan and Draft SEPP on the implementation of the Draft City of Sydney Social Plan and the Action Plan for Aboriginal People: ideally, the Draft Plan and Draft SEPP are welcome opportunities to assist in implementing the City's Draft Social Plan and the Action Plan for Aboriginal People.
17. However neither the Draft Plan nor Draft SEPP consider their role in relation to the complex social issues that exist in Redfern. The Draft Plan largely ignores the other RWA plans – the *Employment and Enterprise Plan* and the *Human Services Plan* – and the Draft Submission at **Attachment B** recommends that an Implementation Plan should be prepared so that the overlapping aims and objectives of each of the RWA plans may be delivered in an holistic framework and also so the many documents prepared by the City of Sydney may also form a part of this implementation. Specifically, the City identifies the following priority needs for Aboriginal People in the Draft Social Plan, which must be addressed through any revitalisation of Redfern:
  - (a) *Increase access to training and employment opportunities for Aboriginal people;*
  - (b) *Increase rates of school attendance amongst young Aboriginal people;*
  - (c) *Improve co-ordination of services and infrastructure in Redfern and Waterloo;*
  - (d) *Improve health and health education services for local Aboriginal people;*
  - (e) *Improve the range of services and facilities for Aboriginal young people;*
  - (f) *Reduce the incidence of homelessness amongst the local Aboriginal population; and*
  - (g) *Promote and support reconciliation and Aboriginal culture.*
18. **Social, cultural and amenity impacts of the proposed land use controls for the Eveleigh Street precinct:** an analysis of this site is undertaken in more detail in Part Two of the Draft Submission at **Attachment B** to this report. In summary the redevelopment proposal for this Strategic Site raises many issues. In heritage and built form terms it is considered that the proposed redevelopment needs further work, to better respond to the location of this Strategic Site within a Heritage Conservation Area. It is not clear in the Draft Plan and Draft SEPP as to whether the Aboriginal Housing Company and Aboriginal People generally have been consulted in the development of this redevelopment proposal – the “Block” is of considerable significance to Aboriginal People not only for the provision of housing, but for its longstanding role as a meeting place.
19. Redevelopment would also bring with it a number of practical challenges related to issues such as illicit drug activity, street drinking and crime. These activities may be relocated elsewhere within the immediate vicinity. Detailed strategies are needed to manage these impacts.

20. **Factors that may inhibit the realisation of the Draft Plan and in particular, in public domain, transport, heritage, infrastructure, utilities, and urban design strategies):** as already discussed in this report, the Draft Submission at **Attachment B** concludes that not enough research has been undertaken to ensure that desired outcomes in relation to the matters listed here will actually eventuate from the Draft Plan and the Draft SEPP. As a result, the Draft Submission recommends deferral of the Draft Plan and the Draft SEPP so that a plethora of further, more detailed investigations and negotiations may be undertaken.
21. **Recommendations for supporting positive aspects and for addressing identified limitations in the Draft Plan and Draft SEPP:** again, whilst the recommendation of the Draft Submission at **Attachment B** is for deferral of the Draft Plan and Draft SEPP, the City supports the concept of revitalising Redfern and there are many opportunities for the City to work with RWA to this end. Limitations in the Draft Plan and Draft SEPP largely come down to a lack of information, hence the recommendation for deferral, so a number of further investigations and reviews may be undertaken and would obviously contribute to a better Draft Plan and Draft SEPP.

#### **RELEVANT LEGISLATION**

22. *Redfern-Waterloo Authority Act*
23. *Environmental Planning and Assessment Act*
24. *State Environmental Planning Policy – Major Projects.*

#### **CRITICAL DATES / TIME FRAMES**

25. The deadline for lodgement of submissions with the RWA is 14 April 2006.

#### **PUBLIC CONSULTATION**

26. The Draft Plan and Draft SEPP are currently on public exhibition. The RWA has also held a public meeting and conducted a number of community and stakeholder workshops. The City of Sydney has also received a briefing on the Draft Plan from the RWA.

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