

ATTACHMENT B

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**DRAFT SUBMISSION IN RESPONSE TO
REDFERN WATERLOO AUTHORITY'S
DRAFT BUILT ENVIRONMENT PLAN**

Redfern – Waterloo
Authority Draft Built
Environment Plan and Draft
State Environmental Planning
Policy

A submission from the Council of the City of Sydney

April 2006

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EXECUTIVE SUMMARY

The City of Sydney appreciates the opportunity to comment on the *Draft Redfern-Waterloo Built Environment Plan* (Draft Plan) and accompanying Draft State Environmental Planning Policy (Draft SEPP). It is understood that the Draft Plan is part of a set of three directional documents prepared by the Redfern Waterloo Authority (RWA), the other two being the *Redfern Waterloo Human Services Plan* and the *Redfern Waterloo Employment and Enterprise Plan*.

The City of Sydney supports the RWA's aim of revitalising the Redfern-Waterloo area. However the present form and content of the Draft Plan and Draft SEPP include 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.

This submission makes a number of recommendations in relation to the advancement of the Draft Plan and Draft SEPP. These recommendations are summarised below.

Recommendations:

- **The City strongly recommends that the Draft Plan and Draft SEPP be deferred until the range of further investigations that will both lead and support the redevelopment of the strategic sites are complete.**
- This work goes beyond the future key tasks in the Draft Plan and include:
 - **Traffic and Transport:** prepare a traffic and transport analysis and plan;
 - **Redfern Railway Station:** resolve the future of this important area, initially through providing advice as to whether the upgrade deals with rail capacity or development potential, or both;
 - **Public Domain and Open Space:** develop a public domain strategy and an open space strategy, to ensure high quality, safe, accessible public spaces;
 - **Affordable Housing Strategy:** develop an affordable housing strategy;
 - **Developer Contributions:** prepare a needs assessment and resultant Section 94 Plan;
 - **Urban Design - Views:** complete a view corridor analysis for local and regional views;
 - **Heritage:** commence a heritage review, which must follow through into a detailed heritage impact analysis for each of the Strategic Sites;
 - **Urban Design - Height and Density:** review height limits and densities with a view to a general reduction across the Strategic Sites, so that other matters such as retention of heritage and maintenance of residential amenity for surrounding existing development are better addressed;
 - **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;
 - **Consultation - "The Block":** continue to consult with the Aboriginal Housing Company regarding the future of "The Block";

- **Consultation - General:** continue a programme of consultation with local businesses and the local residential community;
 - **Implementation Plan:** develop an Implementation Plan, to coordinate the delivery of the three separate RWA Plans – this Plan may look at areas of overlap such as jobs creation programmes for local people and the staging of such programmes through the realisation of floorspace in developing the Strategic Sites;
 - **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 manage traffic and transport issues in an holistic manner; and
 - **Inter-Governmental Coordination:** must exist between Government stakeholders is essential to achieve successful, staged redevelopment of Government land and to resolve related issues such as traffic and transport.
- It is likely that this work will result in information that alters the Draft Plan and Draft SEPP, hence the recommendation of deferral.
 - **Should the Draft Plan and the Draft SEPP proceed without the above investigations being undertaken/completed, the City recommends that the Draft SEPP stage the release of the Strategic Sites, so that sites are gradually released to the market for development, and enabling the deferral of some of the more complex sites until the above investigations are complete.**

PART ONE – STRATEGIC ISSUES

1.0 INTRODUCTION

The City of Sydney appreciates the opportunity to comment on the *Draft Redfern-Waterloo Built Environment Plan* (Draft Plan) and accompanying *Draft State Environmental Planning Policy* (Draft SEPP). It is understood that the Draft Plan is part of a set of three directional documents prepared by the Redfern Waterloo Authority (RWA), the other two being the *Redfern Waterloo Human Services Plan* and the *Redfern Waterloo Employment and Enterprise Plan*.

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.

This submission reviews the contents of the Draft Plan and Draft SEPP and raises issues and questions – some in a general sense and others specific to the Strategic Sites – for the consideration of the RWA. The issues are complex and interrelated, which is often the case when proposing redevelopment in built-up, “brownfields” areas. Broadly the issues include traffic, transport, urban design impacts, heritage impacts and the wider social issues that exist in the Redfern-Waterloo area.

2.0 ISSUES

Following is a summary of the key issues apparent within the Draft Plan and Draft SEPP and the City's suggestions and/or recommendation for addressing these issues.

2.1 Strategy

2.1.1 General

- The strategy component of the Draft Plan is comprehensive and the City commends the Draft Plan for its discussion of the history of the area and the social and cultural environment. These are key contributors to the present and future environment of Redfern-Waterloo.
- The translation of the strategy into actual planning controls does not appear to follow a logical planning process and important relationships – between the Draft Plan and other RWA Plans, and between the Strategic Sites and the wider context – do not appear to be articulated in the Draft Plan or the Draft SEPP.
- Whilst it is understood that human services are the subject of a separate plan, there needs to be better articulation of the relationship between the Draft Plan and the range of existing (and relevant) documentation, including:
 - the Redfern-Waterloo Authority *Human Services Plan*
 - the City of Sydney *Childcare Needs Assessment Study*
 - the City of Sydney *Library Strategy*
 - the City of Sydney *Draft Youth Strategy and Draft Youth Facilities Plan*
 - the City of Sydney *Redfern-Waterloo Community Safety Plan*, and
 - the City of Sydney *Draft Social Plan 2006-2010*.
- Undertaking this more detailed research and planning is essential if the strategies in all three RWA Plans are to become a reality.

- The Draft Plan states that the establishment of cultural and community facilities is a key opportunity arising from the revitalisation of Redfern. The City agrees with this statement, however, the nexus between the Draft Plan and the delivery of new or enhanced cultural and community opportunities is not clear.
- For example: the redevelopment proposed for the Strategic Sites in the Draft Plan is likely to be a key funding source for the priorities in the Human Services Plan, however the contributions planning to clarify developer levies, costs and timing for new facilities is, at this stage, missing.
- Further, more detailed strategy elements such as the mitigation of social issues (for example: social isolation, crime and lack of safety, mental health issues and culturally appropriate housing) through the design of the built environment are not drawn out in the Draft Plan.
- Whilst some of these issues may be addressed in the future development control plans (DCPs) for the Strategic Sites, there is a need for that “missing link” to unite the three plans prepared by the RWA and to ensure that the future key tasks (contributions planning, affordable housing planning, public domain planning and so on) are linked in this central strategy framework.
- **The City proposes that an Implementation Plan is required to bring together overlapping aims and objectives of each of the RWA plans as well as the many documents prepared by the City of Sydney, to ensure that the revitalisation moves successfully from plan to reality.**

2.1.2 Green Square

- The City appreciates the acknowledgement of major redevelopment sites of Green Square Town Centre and the Carlton and United Breweries Site (CUB site) in the Draft Plan.
- However the strategic importance of these areas is not investigated in detail in the Draft Plan.
- With the Green Square Town Centre proposing the effective opposite of the Draft Plan in land use mix, and with this mix being clearly mandated in square metres in the *Draft Green Square Local Environmental Plan* (Draft LEP) for the Green Square Town Centre, it is likely that Green Square may supply the Redfern revitalisation with a significant worker population over the next 15-20 years.
- However there are many existing circumstances that will need to be reviewed and changed if this relationship is to develop to the benefit of both areas. As an example, whilst the issue of transportation is discussed in more detail later in this submission, one present-day issue is that the train between the City and Green Square does not stop at Redfern Station.
- **The City looks forward to the opportunity to liaise further with the Redfern-Waterloo Authority, to progress the planning for both centres in consultation with other stakeholders that may include (but are not limited to) the community, the private sector and the Government.**

2.2 Traffic, Transport and Mobility

- City of Sydney research suggests that the road network and public transport systems in the Local Government Area (LGA) are already at capacity.
- The City is doing what it can to address these issues, including:
 - advocating for public transport reform
 - encouraging alternative modes (i.e. walking and cycling) and
 - revisiting rates of on-site parking provision based on accessibility.

- However the extent of new floorspace proposed by the Draft Plan and made possible by the Draft SEPP for the Strategic Sites is significant and there appears to have been little research to date as to whether the traffic and transport networks will be able to successfully absorb the increased demand.

2.2.1 Road Network

- Specific issues arising from the Draft Plan include the amount and speed of traffic on Gibbons and Regent Streets, as well as the current one-way pair configuration for these streets.
- Reversing the one-way pair and introducing measures to slow traffic and provide parking will improve the general amenity of these streets. King Street in Newtown may be a model to consider in revitalising these streets. Roads and Traffic Authority (RTA) concurrence is required for this, but the Draft Plan makes no comment as to whether the RTA are supportive or at least working with RWA to this end.
- **The City commends the proposed Project Control Group in the Draft Plan, but submits that its scope should be widened, to include the RWA, the Roads and Traffic Authority (RTA), RailCorp and the City of Sydney. This Group may meet regularly to advance issues associated with local and regional traffic in Redfern prior to, during and after redevelopment.**

2.2.2 Rail

- As commented above, the transport network in Redfern is considered to be operating at capacity. Further rail capacity will be essential if Redfern is to grow as a centre as envisaged in the Draft Plan and Draft SEPP.
- The nature of the investigation into the Redfern Railway Station is not clear, even though the railway station is identified as a key component of the Draft Plan.
- It would be helpful to understand if these investigations involve a review of rail capacity and options for providing more capacity through a railway station upgrade, or whether the investigations relate to the provision of additional development potential.
- **The City recommends that the RWA and RailCorp clarify the nature of the investigations for the Redfern Railway Station. The City also repeats the above recommendation, that the proposed Project Control Group must be expanded if it is to be effective.**

2.2.3 Connectivity

- The City is currently preparing a Cycle Strategy and a Pedestrian Strategy to encourage these two transport modes within the Local Government Area (LGA). Planning for movement networks within the RWA area may benefit from discussion with the City as to the content and nature of these strategies.
- Even if the potential connections identified in the Draft Plan are realised through re-development, the area will always be segregated by the physical barrier of the railway line, which effectively splits Redfern and neighbouring Darlington..
- The City would not usually recommend either tunnelling under or bridging over the rail lines, but the extremity of Redfern's situation is clear – north-south connectivity is critical to the success of any revitalisation. Further connections, especially to link to the performing arts centre may be warranted and such connections - be they bridges or tunnels - may be made safer by the presence of adjoining active uses.

- The issue of connectivity needs resolution prior to gazettal of the Draft SEPP. The City again submits that the Project Control Group proposed in the Draft Plan between the RWA and RailCorp must address issues beyond just the railway station, including issues of connectivity across the rail lines.

2.3 Employment and Land Use

2.3.1 Floorspace

- The 600,000 square metres of floor space proposed by the Draft Plan is a significant amount of additional floor space for the Redfern area.
- The City understands that given the location and characteristics of the Strategic Sites, B to D grade office space is the likely market, with Redfern intended to form a satellite to the Sydney Central Business District (CBD).
- Strategies will need to be developed to ensure that the realisation of this floor space is staged, so that supply is relatively balanced with demand over time.
- Achievement of public domain connections highlighted in the Draft Plan will be essential if the employment-generating proportion of the overall projection (approximately 440,000 square metres) is to be realised.
- Further improvements to the capacity of the road and rail networks and other services and facilities will be essential if investment and jobs are to be attracted to Redfern.
- **The City recommends deferral of the Draft SEPP until the future key tasks in the Draft Plan are complete and a staging plan has been developed to strategically release the Strategic Sites for redevelopment.**

2.3.2 Jobs

- Projected jobs of approximately 18,000 are included in the *Employment Enterprise Plan* and they arise largely from the floorspace projection for the Strategic Sites within the Draft Plan.
- Reliance on new commercial floorspace for jobs means that the RWA will need to define and monitor its market and competitors very closely. There are several other competitors likely to seek to establish themselves as satellite centres to the Sydney CBD, including the predominantly commercial development at Darling Harbour East.
- **Staged and gradual release of the Strategic Sites is recommended so that the market is not “flooded” and the RWA may re-assess market conditions and other indicators prior to release of further sites.**
- Whilst commercial development will generate some job opportunities for locals, it is fair to say that most jobs are expected to be taken up by people from outside the area, given the disparity between the skill and education level of local people and the skill and education level likely to be required to occupy the newly created office jobs.
- Ideally, an influx of workers to the Redfern area may create service and support industry jobs for local people however the Draft Plan makes no comment on this issue.
- The reasons for unemployment in local people are complex and interrelated, and include attitudinal barriers, discrimination and low levels of literacy and numeracy.
- **The City proposes that a community development approach to employment and training must be advanced by the RWA – another example of synergies between the Employment and Enterprise Plan and the Draft Plan that have not yet been linked.**

2.3.3 Land Uses

- The preference for employment-generating land uses in the Draft Plan is clear. However the method of achieving the result (through imposing maximum residential floor space ratios – FSRs -within an overall maximum FSR) has proved to be problematic in the City's experience.
- For example, in Ultimo Pyrmont an incentive for commercial land uses of an additional 0.5:1 existed in *Sydney Regional Environmental Plan No. 26*. Given this it was not uncommon for developers to propose predominantly commercial development. Upon securing approval for their building envelope and land use mix, a Section 96 application would then be lodged to vary the land use mix in favour of the market preference of the day – residential development.
- **It is recommended that a mix of measures be considered by the RWA to avoid this scenario. Requirements for covenants on title to specify the approved mix are one measure. Another more precautionary measure may be to simply zone fewer areas in the Draft SEPP for mixed use development.**

2.4 Built Form

2.4.1 Existing 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 existing height limits and FSRs in the area need detailed review, evidenced in some inappropriate development outcomes in the area.
- Obviously the City's review cannot prepare controls for the Strategic Sites, but it will have regard to development adjoining the Strategic Sites and will seek to achieve a high level of amenity and harmony at the boundaries of the Strategic Sites, considering integral development issues such as heritage significance.
- Comments on the proposed controls for the Strategic Sites are following in Part 2 of this submission. Generally speaking, the main concerns for the City of Sydney are the building height controls for a selection of sites, for example: the potential for 18 storeys on Gibbons Street and for up to 10-12 storeys at North and South Eveleigh, respectively.
- **The City recommends continuing dialogue with the RWA as the planning for both the City's land and the Strategic Sites is advanced in the short, medium and long-term.**

2.4.2 Urban Design Issues

- Again, as stated above, detailed comments on the Strategic Sites are made in Part 2 of this submission.
- **Any DCP or DCPs prepared for the Strategic Sites must include as a primary urban design principle the retention of a high standard of residential amenity for existing residential development that adjoins the Strategic Sites.**
- However achievement of this principle will be difficult, given some of the proposed building heights in the Draft Plan and Draft SEPP.
- Mechanisms such as Sun Access Planes may be considered in place of specific height limits, to ensure adequate sun access to open space and to the public domain in general.

- Building height principles should also be included in any future DCP or DCPs for the Strategic Sites to articulate the following points, which are alluded to within the Draft Plan and the Draft SEPP:
 - higher building height and densities within close proximity to Redfern railway station (applying a 400 metre “ped-shed” distance)
 - heights to be in context with surrounding built form, and
 - higher buildings in locations of high visibility.
- Other strategies or principles to be articulated as part of the proposed redevelopment include:
 - locate higher buildings on ridge lines emphasising the natural topography
 - retain key views to, from and over the Strategic Sites, and
 - retain the visual curtilage around heritage items so that they are seen against their original sky backdrop – this is especially important for the former Courthouse and Chief Mechanical Engineer’s building at Eveleigh.

2.4.3 Views and View Corridor Analysis

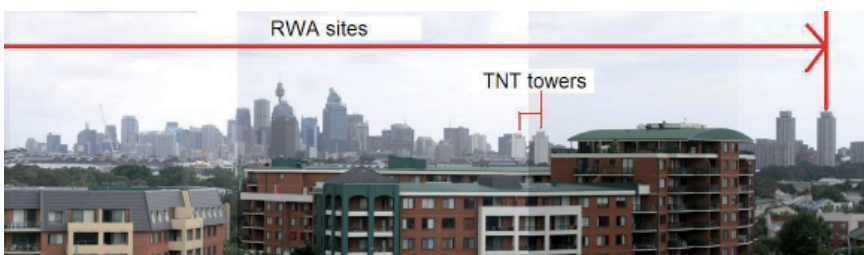
- The Draft Plan and the Draft SEPP do not appear to include the results of any local or regional review corridor assessment.
- Views from public places enable a city to be more legible for the community and visitors. The views to a site often inform its setting in the larger context of the city.
- **A critical principle to be included in the Draft Plan and resulting documents such as DCPs is the retention of regional views from important public places through the development of the Strategic Sites.**
- The most important views are generally from ridges or high points within the visual catchment of the area. In this case the high points are Waterloo Oval, Hollis Park and Sydney Park.

Sydney Park:

- The following photos show the view looking from the eastern knoll of Sydney Park back to the City and over the RWA Strategic Sites.



View looking towards the Strategic Sites from the eastern knoll of Sydney Park



Detail of view looking towards the Strategic Sites taken from the eastern knoll in Sydney Park showing the city skyline

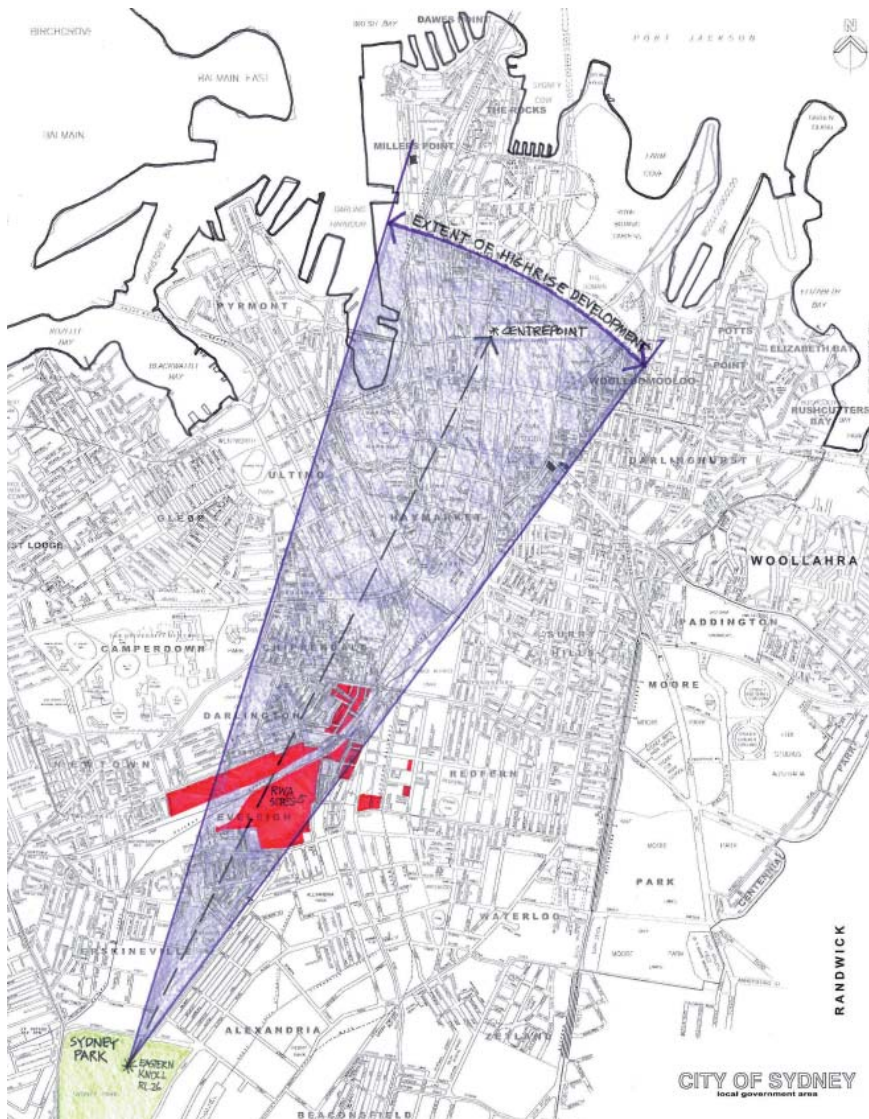
- The view from Sydney Park is the most significant as it contains expansive views to the Sydney CBD skyline over the top of the existing built form on the Strategic Sites. The most expansive view is from the eastern knoll in the park however views are enjoyed from all three knolls within Sydney Park.
- The key features of the views are:
 - high quality background view to the Sydney CBD skyline
 - medium quality middle-ground view to the King Street ridge and the spire of St. Stephens Church, Newtown, and
 - Medium quality middle-ground view to the gabled rooves of the Eveleigh rail sheds.
- Further, the *Sydney Park Plan of Management* (as amended, October 2003) states that on the:
 - *Northern Hill; views to the north and south are unique aspects of Sydney Park that must be retained, and*
 - *Eastern Hill; views to the north and south are unique aspects of Sydney Park that must be retained (P.23).*

Sydney CBD:

- The view corridor for the high quality view to the Sydney CBD is shown on the following map. The Strategic Sites are coloured with red shading.
- Retention of the integrity and legibility of the view is important because it is one of the only public places in the area with expansive views to the Sydney CBD.
- It is likely that the building heights proposed on selected Strategic Sites (for example: Gibbons Street) will read as part of the mass of high-rise buildings forming the CBD, but a detailed analysis is necessary to confirm the impact of the proposed building heights on these regional views.

Local views and conclusions:

- Local views and vistas along public streets must also be retained through any redevelopment of the Strategic Sites.
- The view corridors down Golden Grove, Forbes Street and to a lesser extent, Shepard and Ivy Streets towards the rail line and to the horizon beyond should be retained.
- The Draft Plan terminates these vistas with 10 to 16 storey buildings. It is important that a full analysis of the impact of managing the vistas in this way is undertaken – photomontages are a useful tool to articulate such an exercise.
- **It is recommended that the RWA undertake a more detailed urban design analysis of the Strategic Sites, including a view corridor analysis for local and regional views in the vicinity of the Strategic Sites.**



Plan of view corridor to Sydney CBD from the eastern knoll of Sydney Park

2.5 Heritage

- The Draft Plan and the Draft SEPP do not contain much detail relating to the heritage of the Strategic Sites nor their heritage context. This is unusual considering the significance of some of the areas included in the Strategic Sites, the Eveleigh Railway Workshops being a prime example.
- *The Eveleigh Railway Workshops are of exceptional heritage significance to Australia. As a whole they are one of the best surviving combined 19th century railway workshops in the world. The place is significant for its historic, aesthetic, social and scientific values at local, state, national and, in some respects, international levels (Eveleigh Carriageworks Conservation Management Plan, O. Cserhalmi and Partners, p. 3).*
- The Draft Plan observes that in some circumstances, conservation management plans may need to be prepared, but the above quotation is evidence that for some sites, a wealth of information exists and the high level of significance has already been established.
- The Draft Plan also refers to the need to make a record where a heritage item needs to be removed. The City submits that the redevelopment of the Strategic Sites should not be approached from this angle. All efforts should be made to retain all identified heritage items. Removal of an item should always be an absolute last resort.

- The City recommends that the RWA commence a heritage review process by undertaking in the first instance, a desktop heritage study, in which all existing heritage information for the Strategic Sites and their surrounds is thoroughly reviewed, prior to more detailed analysis of the redevelopment potential for the heritage items and heritage areas within the Strategic Sites.
- Detailed heritage comments are made in respect to each of the Strategic Sites in Part Two of this submission.

2.6 Redfern Railway Station

- The future of the Redfern Railway Station is clearly an integral part of the revitalisation of Redfern however it is difficult to comment on its likely future given that it is not comprehensively addressed in the Draft Plan.
- This is a significant area of uncertainty. Whilst the importance of upgrading the Station is often mentioned in the Draft Plan as a key factor in revitalising Redfern, no options or final position for its future are presented.
- The Station is of considerable heritage significance and any future upgrades be they to achieve greater capacity for the rail function, or developable area, or an improved public domain must be sensitive to the significance of the Station.
- The City recommends that the RWA advise of the scope and nature of the railway station investigations to confirm whether the investigations relate to rail capacity or wider issues such as increasing floorspace through development over the station.
- The City submits that the Project Control Group needs to be broadened, to include the RTA, RailCorp, RWA and representatives of the City so that the Railway Station and other transportation issues may be dealt with in a comprehensive manner.

2.7 Stage 2

- It is understood that Stage 2 of the Draft Plan involves research to investigate options for revitalising public housing stock.
- The commitment to no reduction in the amount of public housing is welcomed however the City urges the Redfern Waterloo Authority to develop as early as possible, a set of guidelines or protocols for working with tenants through the revitalisation process.
- These guidelines or protocols should seek to ensure a minimum amount of any disturbance to or displacement of residents, and must ensure that open, regular and effective channels of communication are put in place between the Government and public housing tenants, as plans for revitalisation are developed and implemented.
- Establishing a Communications Plan, a protocol and other mechanisms such as a Representative Committee are strongly recommended at the earliest possible time in the process of the Stage 2 work, so that public housing tenants are partners in the process from the very beginning.

2.8 State Government Commitment/Coordination

- Much of what the Draft Plan aims to achieve requires high levels of inter-Governmental coordination.
- In the first instance, improved coordination is needed between the three strategies for Redfern Waterloo – the Draft Plan and the *Redfern Waterloo Human Services Plan* and the *Redfern Waterloo Employment and Enterprise Plan*.

- Whilst the three are inextricably linked at a strategic level, each has been authored separately and there is not much coordination between the documents. Their synergies and common strategies and actions need to be combined and progressed centrally.
- Coordination will be required to ensure improvements to traffic and public transport capacity, ideally before any re-development commences on the Strategic Sites as well as to ensure the staged redevelopment of Government land.
- **The establishment of an Inter-Governmental committee or plan to guide (and where necessary, to enforce) Government contribution is strongly recommended.**

2.9 Draft SEPP and Future Key Tasks

- **The City strongly recommends that the Draft Plan and Draft SEPP be deferred until completion of the range of further work that will both lead and support the redevelopment of the strategic sites.**
- This work goes beyond the future key tasks in the Draft Plan and includes:
 - **Traffic and Transport:** prepare a traffic and transport analysis and plan;
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 - **Urban Design - Height and Density:** review height limits and densities with a view to a general reduction across the Strategic Sites, so that other matters such as retention of heritage and maintenance of residential amenity for surrounding existing development are better addressed;
 - **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;
 - **Consultation - “The Block”:** continue to consult with the Aboriginal Housing Company regarding the future of “The Block”;
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 - **Implementation Plan:** develop an Implementation Plan, to coordinate the delivery of the three separate RWA Plans – this Plan may look at areas of overlap such as jobs creation programmes for local people and the staging of such programmes through the realisation of floorspace in developing the Strategic Sites;

- **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 manage traffic and transport issues in an holistic manner; and
- **Inter-Governmental Coordination:** must exist between Government stakeholders is essential to achieve successful, staged redevelopment of Government land and to resolve related issues such as traffic and transport.
- It is likely that this work will result in information that alters the Draft Plan and Draft SEPP, hence the recommendation of deferral.
- **Should the Draft Plan and the Draft SEPP proceed without the above investigations being undertaken/completed, the City recommends that the Draft SEPP stage the release of the Strategic Sites, so that sites are gradually released to the market for development, and enabling the deferral of some of the more complex sites until the above investigations are complete.**

PART TWO – STRATEGIC SITES

This part will provide summary comments on the redevelopment options presented for each Strategic Site in the Draft Plan.

3.0 AUSTRALIAN TECHNOLOGY PARK

Building Heights:

- Proposed building heights should ideally not exceed the ridgeline of the highest railway shed, which is approximately 6 storeys. Given this, the proposal for 9 to 11 storeys is considered excessive.
- The site of the existing Railway Workshop building used by the ATP and other heritage structures within the Strategic Site should retain their existing height, to confirm the retention of these heritage buildings in their current form.
- The potential maximum heights of 9, 11 and 10 storeys proposed adjacent to the south of the heritage buildings do not respect the scale of the heritage buildings, or allowance for view points to and from the heritage buildings.

Connectivity and Open Space:

- Consideration should be given to the potential to extend the proposed central north-south street through to Locomotive Street.
- The retention and additional provision of open space at the Australian Technology park (ATP) is supported.
- Future masterplanning for the site will need to give detailed consideration to the safety and accessibility of the open space and also to establishing safe, clear and effective connections to the surrounding areas.

4.0 NORTH EVELEIGH

Building Heights and Heritage:

- The proposed “landmark / iconic” building is inappropriately located behind the Chief Mechanical Engineer’s Building. A building of this height (potential for 16 storeys) will interfere with the Vine Street vista termination to the Mechanical Engineer’s Building by removing the curtilage of sky above the roofline.
- The proposed height limits should comply with the “Solar and Daylight Access” controls in the *South Sydney Development Control Plan 1997*. Residences on Wilson and Holdsworth Streets could be particularly affected by the proposed building heights for North Eveleigh.
- The maximum 3 storey buildings fronting Wilson Street and backing onto Iverys Lane should remain in context with the surrounding, existing built form.
- The retention of the existing height limits only over the location of the 1887 Chief Mechanical Engineer’s (CME) Building and its garden and the 1887 Carriage Workshops buildings imply that all other heritage buildings on the site are expendable and may be redeveloped – either lost completely or significantly altered.
- The “Fan of Tracks” and the 1887 “Paint Shop” are considered to be of National and International Heritage Significance (Ref: *Eveleigh Carriageworks Conservation Management Plan* Otto Cserhalmi & Partners, 2002) however they have proposed 4 and 10 storey maximum height limits.

- An area with a 16 storey maximum height limit is immediately to the south of the CME building, which would remove views of the CME building from the south.
- The area adjacent and to the north of the Carriage Workshops, occupied by the 1907 Blacksmith's Shop is identified as having a 4 storey maximum height limit, implying demolition of the Blacksmith's Shop.
- To the west of the Carriage Workshops, in an area occupied by the 1913 "Clothing Store" and other heritage buildings and structures, there is a maximum height proposal of 10 storeys, implying the demolition or significant change to the heritage buildings and machinery in this area.



The 1913 "Clothing Store" located in an area with a maximum 10 storey height limit

Connectivity:

- The density of built form at the western end of the site should be reduced as it is more than 800 metres from Redfern Station. 800 metres is the maximum "ped shed" most people are likely to walk from major rail stations, with 400 metres representing a more comfortable and achievable "ped shed".
- An internal vehicular road may be incorporated alongside the western access point to the proposed pedestrian bridge, so as to activate the front of the buildings facing the link and to increase pedestrian safety.
- There is the opportunity to extend Wilson Lane into the site.
- Traverser No. 1 to the north of the Carriage Workshops building is threatened by the road tunnel and/or any overhead bridge proposed in the location shown in the Draft Plan.
- Neither a road tunnel nor a road bridge over Eveleigh from north to south seems ideal. The railway tracks predated the extensive residential development of Darlington and Redfern, suburbs which were always divided by the railway tracks and Eveleigh Railway Workshops.
- However the City is well aware of the need to effectively connect North Eveleigh into the surrounding areas, if the redevelopment of the Strategic Sites is to be successful and Redfern is to be genuinely revitalised. A detailed urban design analysis is proposed, to consider other options for linking North Eveleigh.

5.0 SOUTH EVELEIGH

Heritage:

- It is unclear whether the existing railway shed housing Steam Engine 3801 is to be retained.
- The location of the maximum building heights and of the road tunnel implies demolition of the Large Erecting Shop, built in 1899, and considered to be of State and National heritage significance as part of the nationally significant collection of remaining Eveleigh Railway Workshops heritage buildings and machinery.



The Large Erecting Shop

Building heights and zoning:

- Proposed building heights should not exceed the relative level of the ridgeline of the highest railway shed on the adjacent ATP site.
- In this regard the maximum heights proposed at the eastern end of the South Eveleigh Strategic Site are 12 storeys and 4 storeys, which are considered inappropriate for a heritage area of such significance.
- The predominant business zoning of South Eveleigh also does not appear to take into account the proximity of extensive new multi-unit housing in this area. A mixed business/residential use zone may be more appropriate for this area.

6.0 EVELEIGH STREET

Heritage:

- The Eveleigh Street Strategic Site falls within the Darlington Conservation Area (CA17) under the *South Sydney Local Environmental Plan 1998* (as amended). Whilst the City is reviewing much of the existing planning and urban design controls for the Redfern-Waterloo area, the heritage controls are not subject to review.
- The *South Sydney Conservation Areas Study 2003* recommended that “The Block” bounded by Eveleigh Street, Louis Street, Caroline Street and Vine Street, should be identified as a new Conservation Area within CA17, in recognition of the area’s particular social and cultural values to the Koori community.
- The recommendations of the *South Sydney Conservation Areas Study 2003* were adopted by City of Sydney Council in December 2005, for incorporation into the future planning controls for the City. The City would be pleased to provide a copy of this study to the RWA.

Built Form:

- The intact row of terraces on Eveleigh Street north of Hudson Street should be retained. Height limits for the terraces should be two storeys with a complementary FSR.
- The Draft Plan proposes mixed business, residential & community facility use of the Eveleigh area, with 3 and 4 storey maximum height limits closer to Redfern Station, and 4 and 5 storey maximum height limits further from the Station.
- The maximum height limits imply demolition of all existing housing and warehousing in the area, which are predominantly 2 to 3 storeys in height. While in Hudson Street, which is predominantly industrial warehousing, there may be scope for some redevelopment, the implication of wholesale redevelopment within a conservation area is not appropriate.
- Zonings and height limits for the area should recognise and encourage the retention of the existing intact 2-storey Victorian and Federation terrace housing which contributes to the character of the Conservation Area, encouraging sympathetic (2 to 3 storey) residential infill on vacant sites within the predominantly residential area, and allowing for up to 4 storey redevelopment on neutral and detracting sites in and near Hudson Street.
- Again the City would be pleased to provide the RWA with a copy of the *South Sydney Conservation Areas Study 2003*, which includes mapping of contributory, neutral and detracting buildings within overall Heritage Conservation Areas.

Consultation:

- Any proposal for this area should involve extensive consultation and co-operation with the Aboriginal Housing Company and extensive consultation with the Redfern community, including most particularly the Koori community. The Aboriginal Housing Company's association with land within this Strategic Site is longstanding and significant.
- The Draft Plan reduces the potential number of dwellings possible within this Strategic Site. It is important to note that the Aboriginal Housing Company's preference for 62 dwellings is not a random number – it symbolises the last 62 Gadigal families, who were killed by smallpox that was introduced by white settlers (*Architecture Bulletin*, 3.05, p. 10).
- It is also important to ensure that the planning for this Strategic Site recognises its importance to the Aboriginal people. "The Block" has long been symbolic for Aboriginal people, not for the housing it may provide, but for its role as a meeting place. This role should continue through any plans for redevelopment of this Strategic Site.

Social, Health and Safety Issues:

- There are a number of social and health issues unique to this Strategic Site.
- The Eveleigh Street Precinct ("the Precinct") has a significant history of illicit drug sales and related injecting drug activity. Redevelopment (particularly the construction phase) may lead to a displacement of this activity into the surrounding streets (i.e. Edwards Street, Little Eveleigh Street) and areas (such as Waterloo, Newtown, Glebe and Marrickville).
- There is a significant level of street drinking activity currently occurring within Eveleigh Street Precinct by local and visiting Indigenous groups. Indigenous populations have a special relationship with public spaces, and their history of drinking in public places is also largely as a result of public policy, which needs to be acknowledged and addressed sensitively.

- Redfern Police Local Area Command has the second highest level of robbery offences in NSW. Significant levels of street-based robberies occur adjacent to the Eveleigh Street Precinct. University students, local workers and commuters are usually the targets. Malicious damage and break and enter are also crime categories that are overrepresented in the Redfern Police Local Area Command.
- **It is recommended that the detailed design of the pedestrian corridors and linkages be the subject of a master plan, to plan the network holistically and to improve safety, and reduce risk of street based robberies.**
- **It is also recommended that a Plan of Management be prepared to manage the change proposed for the Eveleigh Street Precinct. This Plan must encompass social, health and safety issues as well as the proposed changes to the built form,**

7.0 REDFERN RAILWAY STATION, GIBBONS AND REGENT STREETS

General:

- Apart from artist's impressions in the document, proposals for Redfern Railway Station are not articulated. As Redfern Railway Station is a heritage item, and has particular historical and physical links with the ATP and North Eveleigh former railway workshops buildings, any proposals for the Station should take these heritage issues into account.
- As stated previously in this submission, the RWA should clarify the nature of the investigations involving the Railway Station – specifically, whether they relate to rail capacity or development potential or both.

Building Heights:

- Current proposals to introduce 7 to 18 storey buildings on the eastern side of Redfern Station are not consistent with the concept of respecting the heritage of the area, and would interfere with views to and from the Water Tower Apartments and the adjacent actual water tower.
- Given the nature of Gibbons Street, an 18 storey height limit that is flush to the street alignment is likely to create the adverse impacts of wind tunnelling and a "canyon" effect.
- With regard to the area between Gibbons Street and Regent Street the Plan variously allows for 18, 7 storey and 5 storey maximum building heights, with a street wall height of 2 storeys to Regent Street.
- Working through this area from north to south:
 - The former TNT Towers are 10 storeys and are extremely prominent. It is noted within the Draft Plan that they are built on a high point. It is considered that any increase in height for the former TNT Towers site is unjustified, given their current obtrusive nature. The introduction of a 2 storey street wall height does not soften the 18 storey maximum height proposed in the centre/southwest portion of the site. It is recommended that the maximum height for Gibbons Street should be reduced and that a street wall height be introduced on Gibbons Street, so that a podium effect may be introduced and the high-rise component of the future development is set back from the street.
 - The sites of the RSL and multistorey carpark buildings fronting Gibbons Street are clearly in need of redevelopment, however again, the potential maximum of 18 storeys is considered excessive.

- 18 storeys as a maximum height proposed on the site to the south of Marian Street is again considered excessive.
- On Regent Street the 2 storey street wall height proposed needs to take in the full extent of the depth of the existing buildings fronting Regent Street, in order to respect the heritage values of both Redfern and Regent Streets.
- The proposed height limits should be reduced to comply with the "Solar and Daylight Access" provisions in the *South Sydney Development Control Plan 1997*. Residences on Rosehill, Margaret and Regent Streets could be particularly affected.

Open Space and Public Domain:

- Allowing an 18 storey building height in this location appears to result in the permanent overshadowing of the Cope Street Reserve on the south side of Cope Street.
- The Draft Plan also indicates that the open space on Marian Street simply disappears. This is alarming given the very low levels of open space in the immediate area. No open space should be lost – especially not prior to the proper assessment of existing and potential open space as part of the future key tasks in relation to the Public Domain Plan and Section 94 Plan.
- Sun access planes may also be considered as an alternative to a height limit in storeys, to ensure that appropriate sunlight is received to open space and the public domain generally.

Heritage:

- The City of Sydney is completing a Heritage Streetscapes Study. The consultants doing this work have recommended that heritage assessments be undertaken for the following groups of buildings within Regent Street:
 - 22-42 Botany Road
 - 33-47 Botany Road
 - 60-96 Regent Street, and
 - 149-195 Regent Street.
- Heritage assessments for 60-96 Regent Street are also considered necessary in order to assist the understanding of the heritage value of Regent Street. The City has recently commissioned heritage assessments of the following properties:
 - 22-42 Botany Road
 - 33-47 Botany Road, and
 - 149-195 Regent Street.

Connectivity:

- The town square must be carefully designed to ensure active, after-hours activity.
- The potential for loss of open space on block bounded by Marian, Regent, Margaret and Rosehill Streets should be replaced in the nearby area or could remain as a soft landscaped space.
- There is potential to extend Marian Street to the rail line to introduce cars and therefore increase safety for pedestrians.
- There is also potential to create a new street between the proposed public square and Marian Street

8.0 FORMER RACHEL FORSTER HOSPITAL

Heritage:

- The site should be subject to a thorough heritage assessment including a full archaeological assessment, as it was the site of Dr. Redfern's house.
- Preparation of an extensive Interpretation Plan should form part of the requirements for any redevelopment, as the site has a high level of social and historical heritage significance.
- Adaptive reuse of former hospital buildings of heritage significance should be explored in the first instance.

Built form:

- It is recommended that the 3 storey height limit be extended along the entire length of the Pitt Street frontage.
- The proposed height limits should be re-assessed and potentially reduced so as to ensure compliance with the "Solar and Daylight Access" provisions in the *South Sydney Development Control Plan 1997*. Residences to the south and west of the site could be particularly affected by the proposed height limits in the Draft Plan and Draft SEPP.
- This Strategic Site offers the potential for a new piece of public open space within the site.

9.0 FORMER LOCAL COURT HOUSE AND REDFERN POLICE STATION

Heritage:

- The former Redfern Court House/Police Station at 103-105 Redfern Street /30 Turner Street Redfern is a heritage listed site in the *South Sydney Local Environmental Plan 1998*.
- The Courthouse is part of the Redfern Street Heritage Streetscape, and the site is also within the Redfern Estate Conservation Area (CA42) under the same local environmental plan. In addition, there is a heritage-listed group of single storey (c. 1850 terraces) at 19-25 Turner Street, directly opposite the Police Station site.
- The former Courthouse/Police Station is a combination of the 1898 Walter Liberty Vernon (NSW Government Architect) designed former Redfern Courthouse and the c. 1915 brick Federation Free Style former Police Station, which is believed to incorporate part of an earlier Police Station within it.
- The Draft Plan implicitly enables for the demolition of the Police Station, as it allows for a maximum height of 6 storey with a 3 storey street wall height to Turner Street on the site of the Police Station.
- The Police Station requires a thorough heritage assessment so as to determine its heritage significance, which has never been fully explored despite its heritage listing. Research would be relatively simple, as most relevant records would be held in State Archives.
- Adaptive re-use of the existing heritage listed former Police Station building should be considered in the first instance.

Built Form:

- The proposed 6 storey height limit will visually dominate the former Courthouse. The proposed height should be reviewed with a view to reduction, to respect the heritage curtilage of the former court house where the parapet is traditionally seen against a sky backdrop. Allow for a lane to service the rear of the terraces fronting Pitt Street
- Again, a reduction in the height limits may be necessary to comply with the "Solar and Daylight Access" provisions in the *South Sydney Development Control Plan 1997*. Residences on Turner and Pitt Streets could be particularly affected by the proposed height limits.
- The proposed Turner Street façade should continue the height of the parapet of the terrace immediately to the east.
- The proposed 6 storey maximum height on the former Police Station site would impact adversely on the former Courthouse and the Redfern Street Heritage Streetscape, as it would be visible from Redfern Street.
- The street wall height to Turner Street of 3 storeys, with 6 storey development behind, would impact adversely on the row of single storey heritage listed terraces at 19-25 Turner Street opposite.

10.0 FORMER REDFERN PUBLIC SCHOOL**Heritage:**

- The Former Redfern Public School is a heritage item under *South Sydney Local Environmental Plan 1998* and is also within the Redfern Estate Conservation Area (CA42) under the same local environmental plan.
- The maintenance of existing heights over the buildings of heritage significance on the site implies that these buildings are to be retained and conserved.
- The proposed 4 storey maximum height proposed to George Street is considered excessive within a conservation area characterised by 2 storey Victorian terraces. A maximum height of no more than 3 storeys should be considered fronting George Street.

Built Form:

- The proposed new public open space should be zoned for, to ensure its delivery.
- Maximum 4 to 5 storey buildings on the corner of Cope and Phillip Streets in considered to be in context with the surrounding built form of heritage items to the east and new development and warehouses to the west.
- The maximum 3 storeys north of proposed east-west street will be generally in context with the surrounding built form.

Connectivity:

- A new street between George and Renwick Streets at the northern end of the site could be provided, in context with the fine grained streets in the area and to break up the building envelopes.