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12 June 2008

The Director
Urban Assessments
GPO Box 39
Sydney NSW 2001

Dear Sir / Madam

CONCEPT PLAN FOR PROPOSED NORTH EVELEIGH REDEVELOPMENT, WILSON STREET, NORTH EVELEIGH (REF: MP 08_0015)

REQUEST FOR COMMENTS ON THE CONCEPT PLAN

I refer to your correspondence regarding the above.

Given the timeframe to make comment on the redevelopment of the North Eveleigh site, the proposal was not referred to the Planning Development and Transport Committee of Council or the Central Sydney Planning Committee for comment. The following information is provided by the Council's Planning Department.

Preamble

An Environmental Assessment Report was submitted to the Minister of Planning on behalf of Redfern-Waterloo Authority (RWA) under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of the redevelopment of North Eveleigh, formerly known as the Eveleigh Carriage Workshops.

North Eveleigh is identified as a State Significant Site to which Part 3A of the EP&A Act applies under *State Environmental Planning Policy (Major Projects)*.

The Concept Plan seeks approval for the achievement on the North Eveleigh site of a floor space equivalent to 180,007 sq m for the whole site (10.7 hectares), maximum building heights (ranging from 4 to 16 stories), street and building layout, associated road works and building envelopes, parking (estimated to be up to 3 levels of basement parking to accommodate approximately 1943 vehicles) and vehicle access from two points (i.e. a new access near Sheppard Street and one to be modified which currently exists at the eastern end of the site off Wilson Street). The road from Little Eveleigh Street to Wilson Street will remain closed. The project will include 92,139 sq m of floor space for residential development, including a 16 storey tower at the eastern end of the site near the proposed pedestrian and cycle bridge crossing (separate application to be lodged for bridge) as a gateway element, and 61,072 sq m of floor space for commercial, 4000 sq m of retail and 61,072 sq m cultural / community purposes.

The final number, layout, mix and size of apartments, and number of parking spaces do not form part of this application and will ultimately be determined in subsequent Project Application(s). However, the architectural concept plans include an indicative apartment layout illustrating different apartment types that may be accommodated within the building envelopes.

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The proposed development will result in less gross floor area than the maximum permitted under the site's planning controls.

The proposed Floor Space Ratio (FSR) for the entire development is 1.67:1. The following FSRs for the Eastern, Western and Central Precincts are achieved:

- Eastern Precinct: The achievement of a maximum floor space ratio of 2:1 for mixed use development (approximately 94,280m²) and 1:1 for residential development (approximately 47,140 m²)
- Western Precinct: The achievement of a maximum floor space ratio of 2:1 (approximately 57,960m²)
- Central Precinct: The achievement of a maximum floor space ratio of 1.1:1 (approximately 34,588 m²).

The RWA proposes the adaptive reuse of heritage buildings and buildings of historic interest (i.e. the Carriage Workshop, Blacksmiths' Shop, Telecommunications Equipment Centre, Chief Mechanical Engineer's Office Building, Scientific Services Building No 1, Clothing Store, and restoration (in part), rebuild and extension of the Paint Shop Building) including 52,730 sq m of floor space within these buildings, which amounts to 29% of the gross floor area of the site. Approximately 20% (23,125 sq m) of the site is also proposed as publicly accessible open space, and 5,210 sq m of private space will be provided for residents.

A significant proportion of the 10.7 hectare site will be retained in public ownership. This includes the Yaama Dhiyaan Indigenous Training College, the Carriage Works Performance Space (Note: an additional 12,000 sq m of floor space in the western half of the building is proposed as part of the Concept Plan)), the Eveleigh Community Markets (Blacksmiths' Workshop) and the former Scientific Services building on Wilson Street which is proposed to be a community centre.

Although the City is supportive of the intention to revitalise the North Eveleigh area, the Concept Plan proposes elements that may significantly compromise the amenity of both existing and future development in Redfern.

A review of the documentation has identified a number of key issues, set out below, which are requested to be taken into consideration during the assessment and determination of the proposal.

Sustainable Sydney 2030

Concerns are raised that the North Eveleigh Concept Plan (NECP) falls substantially short of the promise of the Redfern-Waterloo Built Environment Plan (Stage One) August 2006 (BEP), and the opportunities described in Council's Draft Sustainable Sydney-2030 (SS-2030).

The BEP, NECP and SS-2030 explicitly and generally express the importance of better integration into the existing city fabric. The bridge to facilitate pedestrian and cycle movements between North Eveleigh and the Australian Technology Park (ATP) car park must still be provided. This bridge formed part of a previous DA consent approval for the performing arts centre (Carriageworks Site).

Cogeneration is a technology that should be included as part of the Concept Plan.

It is recommended that of all housing 7.5% will be social housing, and 7.5% will be affordable housing delivered by 'Not-for-Profit' or other providers.

To allow for a more 'fine grained' development approach, basic development rules need to be 'locked in' now, particularly focusing on integrating street networks, permeability and the public domain with the surrounding area, and not just a focus on the final built form of particular lots.

There is a recognised shortfall of accessible open space in the vicinity of this site. Some open space is proposed, although there is no large scale parkland. No detailed design of open spaces has been provided as part of the concept Masterplan. Concerns are raised that the proposed publicly accessible open space is in the form of building separation / forecourts etc rather than genuine useable public open space. In addition, concern is raised that some of the proposed spaces would be of substandard size to be legible and properly utilized by the community and in some cases compromised by such issues as poor accessibility and / or rail noise.

In terms of rail noise, detailed consideration should also be given to the appropriateness of uses at this stage and mitigation measures to both internal and external spaces.

Better connections to and from the site are required as it would be largely isolated from this centre. Without better connections to and from the site, components such as the proposed supermarket and other employment activities are inappropriate as they will not contribute greatly to this centre.

Heritage

The heritage impact of the proposed apartment buildings on top of the Paintshop has major heritage impacts. It appears to require demolition of most of the south (railway line) elevation of the building. This is the principle facade seen by large numbers of the public, so its conservation is crucial.

The proposed adaptation of the Chief Engineer's Office Building to residential use is inappropriate due to the extensive intervention and subdivision required.

The proposed adaptation of the clothing store to residential use is potentially acceptable but, as with the Chief Engineer's office, commercial may require less physical intervention and be a better fit to the office.

The extent of new buildings proposed over the 'fan-of-tracks' east of the Paintshop is likely to have major impacts on both fabric and the ability to interpret this highly ranked heritage feature when on the ground.

The proposed 16-storey 'landmark / iconic' building is inappropriate as it will interfere with the Vine Street vista termination of the Chief Mechanical Engineer's (CME) building by removing the cartilage of sky above the roofline, and unacceptably remove views of the CME building from the south.

SEPP 65-Residential Amenity

The proposal shall provide a high level of residential amenity in accordance with SEPP 65. An assessment under SEPP 65 (including Residential Flat Design Code) will need to demonstrate that the development meets the design quality principles and provides an excellent example of quality design in respect to building configuration, internal amenity, urban design and sustainability.

The detailed proposal must integrate with the existing / retained uses on the site, and also undertake an assessment of potential impacts on the residential amenity of the adjoining residents including privacy and overshadowing. The analysis shall include shadow diagrams in plan and elevation and boundary cross sections, including sightlines.

Sustainability

At the Project Application Stage the detailed design of the development shall incorporate ESD initiatives that achieve 'world's best practice'.

As the proposal is for a concept approval, the Environmental Assessment is not accompanied by a BASiX Certification. Nonetheless, the Environmental Assessment should require Ecological Sustainable Development principles to be addressed and demonstrate that the development will meet the water and energy reduction targets for new multi unit housing.

Traffic Parking and Access

The traffic generation rates, mode split rates and car occupancy rates do not appear to have been undertaken as per the *RTA Guide to Traffic Generating Developments* and known occupancy rates.

The traffic modelling does not appear to accurately reflect the existing traffic situation on the surrounding state road network, nor take into account long standing proposals to Close Sheppard Street and Ivy Street both north of Abercrombie Street, and Butlin Avenue within the University.

It should be ensured that all public transport upgrades are available as close as possible to the site being occupied. Accessible local public transport is also a priority.

There will need to be design and installation of suitable traffic management arrangements to prevent site traffic using Queen Street, also ensuring that all heavy vehicle traffic will be directed along Golden Grove Street.

A review of the traffic impact the development will cause to Erskineville Village should be undertaken, avoiding the use of residential streets where possible.

To date, insufficient, co-ordinated details have been provided with regard to critical aspects to enable a proper assessment of the proposed road dedications as part of the proposal.

Wilson, Abercrombie and Codrington Streets form part of the City's cycleway network laid out in the City's adopted Cycle Strategy and Action Plan 2007 - 2017. Wilson Street is proposed to have separated cycleway constructed on the North Eveleigh development side of the road for the section between Ivy Street to Burren Avenue. Any reconstruction of the roundabouts to enlarge them in this section of road would have a negative impact on the City's cost of construction for the separated cycleway, and therefore can not be supported.

Golden Grove Street is a key access corridor from King Street and disability access to the site must be provided at this location. Accessible access should also be provided to the central and western site precincts, as well as to the performing art centre and proposed supermarket.

The increased traffic and pedestrian movements in the area will require pedestrian facility upgrades across and along Wilson Street.

Existing parking facilities must be retained and clearly marked for their use only. Car share parking spaces must also be provided in a publicly available location within the site. Parking rates are to comply with Central Sydney DCP and South Sydney DCP 11.

All occupants (including residential and commercial) will not be eligible for any City of Sydney parking permits.

The City will not consider changes to parking restrictions on Abercrombie, Lawson or Shepherd Streets as part of this development as these streets are local streets and the City does not want them to carry any more traffic.

Affordable housing

The Concept Plan confirms that a 'significant proportion' of housing on the site will be affordable housing. However, there is no indication of the location, quantum or design of the affordable housing. The Council supports the provision of accessible affordable housing on the site and requests information on the location, quantum or design of the affordable housing.

Future affordable housing on the North Eveleigh site should include a substantial component of culturally appropriate housing for Aboriginal and Torres Strait Islander communities.

Community

The provision of affordable on-site child care, compliant with the City's Child Care Centres DCP, to meet the needs of future resident and workforce populations on the site and open to other families, is supported.

The provision of community facilities to support community development of both the future resident and workforce populations on the site and surrounding communities is supported.

The proposal includes employment (and training) of Aboriginal people, through the Redfern Waterloo Authority's existing Aboriginal employment programs. This is strongly supported.

Analysis of the demographics of the future resident population (projected to be 2400 people) should be undertaken and applied to design considerations. The community development needs of the new resident population, beyond the community centre and during the renewal process is also required.

Public domain

Despite the scale of the development, there is little if any discussion about the impacts on the surrounding public domain / streetscape and how this will be managed / protected.

What is intended within each stage is unclear – e.g. construction and dedication or just construction? The Council may have issues accepting dedication of land that will be subject to later construction traffic, without a community to serve.

The overall design of the open space areas, including publicly accessible and private spaces, is heavily fragmented and results in a number of small, narrow spaces. The Council is not convinced how they will be used and the amenity they will offer.

Thank you for the opportunity to provide input at this stage of the proposal. I look forward to providing further comment when the detailed project application is formally submitted. If you require any further information please contact David Hannam by telephone on 9265 9333, or by email at dhannam@cityofsydney.nsw.gov.au

Yours sincerely



GARRY HARDING
Acting Chief Executive Officer

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