

Submission on Paint Shop sub-precinct rezoning proposal

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Introduction

This submission is made on behalf of REDWatch Incorporated (REDWatch). REDWatch was set up in 2004 with the following objects in its constitution:

REDWatch is a group of community residents and friends from Redfern, Waterloo, Eveleigh and Darlington who support the existing diversity in these areas and wish to promote sustainable, responsible economic and social development.

REDWatch recognises the importance of the Aboriginal community to the area.

REDWatch has been formed to:

1. *Monitor the activities of the Government (local, state and federal), the Redfern Waterloo Authority, and any other government instrumentality with responsibility for the Redfern, Waterloo, Darlingtown and Eveleigh area, to ensure that:*
 - (a) *The strategy benefits a diverse community*
 - (b) *Communication and consultation is comprehensive and responsive*
 - (c) *Pressure is maintained on authorities*
2. *Provide a mechanism for discussion and action on community issues.*
3. *Enhance communication between community groups and encourage broad community participation.*

This may involve: Holding regular meetings; Holding community forums and other events; Establishing a website; Communicating with the community through other means; Meeting with government representatives and authorities; Cooperating with other community organisations; And any other means the association deems appropriate

REDWatch makes this submission on the Paint Shop sub-precinct rezoning proposal in line with these objects.

REDWatch welcomes the opportunity to comment upon this planning proposal.

Exhibited master plan is not accepted and needs to be reworked and re-exhibited

REDWatch opposes the proposed master plan and the proposed controls emanating from it. REDWatch requests the DPE to reject the current proposal and to request Transport for NSW (TfNSW) on behalf of the Transport Asset Holding Entity (TAHE) to further consult with City of Sydney Council and the surrounding community to develop a new master plan prior to a formal planning proposal being re-exhibited.

A proposal that does not have community support is at increased risk of community opposition and reputational risk for the developer. This increase in risk will be factored into what developers are prepared to pay for the site.

It is hence in TAHE and TfNSW's best interest to review the proposal, to respond to Council and community concerns and to go to the market with a proposal that will get greater support from the community and heritage interests.

While REDWatch representatives were involved in the Visioning process for this site, the promised pre-exhibition consultation with REDWatch never eventuated. As a result REDWatch only saw the proposal when it went on exhibition for a short 4 week period and hence REDWatch has not been able to put forward an alternative proposal or fully comment upon the proposal.

The exhibition time for such a significant proposal which has not been the subject of pre-exhibition consultation is totally inadequate and demonstrates contempt for the impacted community.

REDWatch understands that Council, in its submission are proposing an alternative approach. REDWatch has not sighted this approach but expect it to better respond to community concerns. In REDWatch's view a viable outcome is best achieved by further conversations about the issues raised in the submissions and what makes a master plan that can be broadly supported.

NSW Government Conflict of Interest needs to be addressed

It has to be recognised that the current proposal is in effect an ambit claim by TfNSW / TAHE to maximise the development possible on the site so TAHE can maximise the return to it on the sale of the site. The proposed controls are hence very general and allow maximum flexibility for the bidders for the site in the expectation that this will extract the best return to TAHE.

REDWatch does not want to see another incidence where the Government as decision maker and as landowner, impose development controls that benefit the government body but which work against the interests and concerns of the communities surrounding the site.

The “Explanation of Intended Effect” for the Paint Shop Precinct starts by saying: *“The NSW Government is investing in the renewal of the Redfern North Eveleigh to create a unique mixed-use and innovation precinct, located within the State significant heritage context of North Eveleigh”.*

It seems to REDWatch that NSW Government's investment is aimed at what is necessary to obtain a rezoning so it can sell the site at the best possible price rather than an investment in the long term outcome for the site and community surrounding it.

As was said at a community meeting with councillors, the local MP and over 100 members of the community:

If the NSW Government were really investing in the site, then please explain:

- *Why the floor space is increased by 39%.*
- *Why there is only 15% ‘affordable’ housing, and no social housing or Aboriginal housing.*
- *Why the need to endanger the site’s heritage by proposing a building on top of the paint shop, and to demolish a portion of the paint shop extension.*
- *Why the site will be privatised.*
- *Why there is no bridge connecting North & South Eveleigh.*

REDWatch is of the view that the fundamental conflict of interest between the Government as land owner and the Government as decider of the planning controls should have meant that the Planning Proposal should have been made through Council, not the Department of Planning and Environment (DPE). A revised master plan needs to be exhibited through Council. The gateway approval process is controlled by DPE anyway so at least at the early master planning stage North Eveleigh should be handled by Council.

On the same basis REDWatch does not support DA's for this site being handled as State Significant and requests that all planning approvals are assessed by Council independent of the NSW Government as the land owner.

Pedestrian bridge is required in a Master Plan

In the Visioning process and subsequently, the community, and surrounding landowners have requested a pedestrian and cycle bridge reconnecting North and South Eveleigh between the Paint Shop / Carriageworks on the north side with the Locomotive Workshops / Large Erecting Shop (LES) on the Southside.

The proposal for such a bridge exists in the final Redfern Waterloo Authority (RWA) Built Environment Plan One and in the North Eveleigh Concept Plan (2008) which is still in effect. The RWA Contributions Plan lists the bridge as an item for which it has been collecting developer contributions since 2006.

The bridge is now proposed in the position originally proposed by the RWA rather than shown in the 2008 concept plan. This is because the Southern Concourse at Redfern Station will provide some improved connectivity towards the station. Even with the Southern Concourse, a pedestrian bridge at Carriageworks will cut 15 minutes off pedestrian movements from Alexandria / Erskineville to Carriageworks / Sydney University. REDWatch welcomes the master plan reference to the possibility of a bridge in the location requested by the community.

In the Urban Design Study for the Paint Shop Precinct there is the single page assessment of a pedestrian link bridge between North and South Eveleigh (page 324). The last sentence on that page states *“Detailed consideration is outside the project scope and does not have NSW Government funding”*.

The master plan must deliver a bridge. Irrespective of if the bridge is expected to be paid for by the developer or the Government who currently hold the contributions already collected for its construction. As with the ATP sale there must be an easement that allows the bridge to land on both sides of the railway line as part of the TAHE sales on both North and South Eveleigh.

There must also be an agreement within the sale as to if the developer is paying for the bridge, the government is paying, or what the cost split basis will be. Either way the bridge needs to be in the concept plan. With contributions collected for the delivery of the bridge and the failure of Government to deliver half the cost of the bridge through the ATP (2011 version of the Contributions Plan), the NSW Government has an obligation to deliver this promised local infrastructure that in 2011 was still rated for the earliest delivery.

The “Explanation of Intended Effect” states that *“renewal of the precinct is aimed at creating a connected destination for living and working in an inclusive, active and sustainable place for everyone, where communities gather”* (page 3). Yet despite many claims throughout the proposal that it improves connectivity, the proposal only connects to the adjacent Redfern Railway station and does nothing to improve connectivity across the rail corridor which would provide a huge time saving for pedestrians, encourage greater active transport and reconnect the two halves of the Former Eveleigh Railway Workshops as proposed in the Overarching Conservation Management Plan.

TfNSW / TAHE are in the process of setting both the LES and the Paint Shop Precinct up for sale and yet neither proposal addresses the benefits of a pedestrian and cycle-bridge connecting both sites. REDWatch can only conclude that TfNSW / TAHE are doing the minimum necessary to get the best sale price for the sites and that factoring in the needed cross railway connection would eat into the returns that TAHE will achieve from the sale.

REDWatch notes that the indicative master plan for development around central station includes three proposed railway corridor crossings and yet nothing is proposed for Eveleigh.

REDWatch can only conclude that the NSW Government is not really interested in improved connectivity, productivity and investing in Redfern North Eveleigh otherwise it would be investing in such a connection as part of Redfern North Eveleigh. By not doing so the opening sentence in the “Explanation of Intended Effect” and repeated claims of improved connectivity are shown up to be just window dressing rather than statements of fact.

For REDWatch a master plan without a pedestrian / cycle connection cannot be supported and TfNSW / TAHE needs to come back with an amended master plan that honours this long term commitment to the community.

Master plan needs to respect Heritage and the Paint Shop

The proposal, in both the 2008 master plan and the current master plan, to build through the Paint Shop cannot be supported. The Overarching Conservation Management Plan (OCMP) places the Paint Shop (1887) heritage value alongside that of the Chief Mechanical Engineers Building (1887) and Carriageworks (1887) as being of Exceptional heritage value.

The proposal to build through the Paint Shop and place a five storey building on top of it is nothing short of heritage vandalism. To try and dress up the proposal, as if to put lipstick on this particular pig, the master plan proposes the building above the Paint Shop be Aboriginal themed.

A lot of Aboriginal families have historical ties to both the NSW railways and to the former Eveleigh Railway Workshops where ancestors worked. REDWatch supports Aboriginal connections being recognised on the site but not the attempt to trade Aboriginal recognition off against the site's heritage significance.

REDWatch appreciates that the reuse of the Paint Shop throws up challenges and these need to be worked through to arrive at both an acceptable commercial reuse and an acceptable heritage outcome. Recognising the heritage value and then trashing it is not an acceptable outcome.

REDWatch notes that the Paint Shop has a large floorplate that may make it suitable for use by companies looking for such a large space. REDWatch notes the concerns of the NSW Heritage Council in the Consultation Report and agrees with those concerns, which have not been addressed in the exhibited proposal.

REDWatch notes that since the RWA BEP1 controls were put in place that much more independent work has been done in assessing the sites heritage values. In particular in this exhibition we have the Overarching Conservation Management Plan which the development needs to address. This work needs to be reflected in the master plan and in the movement of the heritage map to the LEP.

Proposed LEP Heritage Map needs updating

Currently the proposed LEP heritage map does not recognise all items rated in the OCMP as having Exceptional or High heritage value on the site. Traverser No 1 (1901) is rated as Exceptional and the Fan of Tracks (1884) is rated as Exceptional to High but they are not on the map.

Missing also from the High heritage value list in the proposed LEP are the Paint Shop Extension (1912) and the Brick Retaining Wall along Wilson Street (pre 1887) while other High heritage value sites like Scientific Services (1916) the Telecommunications Equipment Centre (1912) and the Blacksmith Workshop (1907) are recognised on the proposed LEP map.

Now that there is an independent assessment of the heritage value of the site's heritage items, all items shown as "Exceptional" or "High" need to be added to the proposed LEP Heritage map. The RWA's 2006 assessment, when they were getting the site ready for sale, should not be carried into the new controls and all key heritage items need to be recognised on the heritage map and a revised master plan needs to address the heritage importance of all heritage items rather than ignoring them because they are not on the RWA heritage map.

REDWatch needs to see the LEP heritage map updated and the master plan address all the significant heritage sites in a way the exhibited proposal does not.

Darlington Heritage Conservation Area – impact mitigation needed

REDWatch has concerns about the way in which the master plan fronts Wilson Street with building higher than the conservation area. REDWatch would prefer a design approach that saw residential building along Wilson Street with a similar height to the Victorian Terraces on the northern side. This would limit buildings fronting Wilson Street to 3-4 storeys (including the cut away). The master plan suggestion of five storeys buildings fronting Wilson Street with a short setback to 8 or 9 storeys is opposed.

Consideration should be given to assessing if residential buildings should front along all of Wilson Street rather than taking a large space for the proposed landscaped disability access. The disability access to Carriageworks shows this access can be provided in a much more compact manner and this would potentially result in more usable open space within the site.

We have noted below that building at similar height along Wilson Street would not only provide a better transition to the Conservation area but that it may also provide a sound and light barrier to the existing terraces.

The height proposed for the 28, 26 and 18 storey towers will also have a visual impact on those living in the Wilson Street terraces as well as those walking through the conservation area. This lends weight to the belief that the height is excessive and needs to be reconsidered due to its impact on the conservation area.

Twenty-Four Hour Economy – Night time activation issues

The Explanation of Intended Effect states that “Day and night-time activation of the precinct is a key outcome”. One of the challenges in area with mixed use zoning is how to separate the quiet enjoyment of residential units from the often noise of a night-time or 24 hour economy area. REDWatch is aware that this issue has been raised from 501 Wilson Street which will be the most impacted by the new development.

The master plan has not however shown how existing and new residential uses will be separated from areas where a night-time economy is proposed. Over the years there have been many complaints raised from those opposite the site about both events held at Carriageworks as well as sound travelling across the railway line from the old ATP when they staged event there.

The master plan needs to ensure both the location of housing and spaces used as part of the night-time economy are separated and that building standards require new units to have good sound proofing. This of course does not work for existing units and terraces where management of noise from the night-time economy and 24 hour venues will need to be controlled to minimise noise impacts.

The proposal of a park stretching up the slope from the fan of tracks and potential night-time economy spaces around the paint-shop and paint-shop annex is of particular concern. Protection of those in the Wilson street terraces may best be achieved by residential buildings along the southern side of Wilson Street that can be properly sound proofed. This however would not work to protect the units at 501 from sound, light and other impacts resulting from the implementation of the exhibited master plan. This impact will require separate remediation.

Height vs Floor Plate size for proposed towers

REDWatch understand Council will raise the issue of floor plate sizes in its submission. This is a key concern for many businesses who may want to buy or rent into this site. Larger floor plate buildings with less height would lead to a more sympathetic relationship with the redevelopment at North Eveleigh and less impact on the conservation area. This was the approach taken in the Commonwealth bank buildings at South Eveleigh.

In general terms REDWatch supports the lower rise density approach taken by Council to the high-rise proposed in the exhibited master plan. REDWatch needs to reserve its position on Council’s proposal as we, and the community, have not sighted it and REDWatch does not know how it might work on a site that contains many heritage items that need to be worked with. REDWatch makes the point however that the Paint Shop and the Paint Shop extension do offer large ground floorplates.

REDWatch notes however that the decision to inject a 40% FSR increase over the initial RWA planning controls into the site is a major contributor to the scale and bulk proposed. This is in stark contrast to the scale of the heritage items on the site and to the conservation area. Even with the lower 2008 FSR there were still unacceptable outcomes, like building through the Paint Shop that were not supported.

REDWatch placed photos of the model for the proposed master plan supplied to the City of Sydney on its website and Facebook. These models have received many comments about how inappropriate the proposed scale is. On 25th evening the photos had a reach of almost 6,000 views and over 2,000 engagements. The community have not yet seen Council's proposal or had the opportunity to comment on it.

Both the Council's proposal and community submissions need to be considered by TfNSW and TAHE ahead of further discussions with the community about the appropriate height and density for this site. The LEP controls should follow from this.

Site Access and Traffic Impacts

How traffic works for the redevelopment of a land locked site like North Eveleigh has been a planning headache from the time the RWA started planning for the site. The area backs on to the railway line with movement from the site having to use rail crossings on Lawson Street or at Macdonaldtown, Erskineville and Newtown. In 2008 REDWatch was advised there were weight restrictions on Shepherd Street towards Cleveland as well as on Lawson Street Bridge. REDWatch would expect these restriction may still apply although load restriction signage has subsequently been removed from Lawson Street Bridge after some work.

While REDWatch welcomes the reduced car parking proposed, REDWatch is not sure that the traffic issues associated with the proposed redevelopment have been adequately addressed. The traffic study for the 2008 master plan was inadequate and the Department of Planning, as a result of the exhibition, appointed its own consultant, SKM, to review the original consultants work. As a result the 2008 master plan approval was conditioned with a requirement for a Transport Management and Accessibility Plan (TMAP) to be prepared prior to or concurrently with the first project application that includes new floor space for the site. The approval detailed a number of issues that needed to be addressed.

At the time of the construction of the western entrance RWA / SMDA used an Infrastructure provision and thus avoided the need to undertake the additional traffic work required.

Similar questions seem to arise from the current traffic study for this master plan and REDWatch urges DPE to check Instrument of Approval for Concept Plan 08_0015 to ensure all the issues identified at that time by the Planning Department have been adequately addressed in the current proposal.

REDWatch has major concerns about the way the master plan proposes access to the site for construction and operations. Currently under the indicative staging plan in the master plan, the main proposed access road is not built until stage 4. The development of buildings at the east end uses access through Little Eveleigh Street and the Developments at the western end require servicing past Carriageworks. The impact of this staging on the surrounding residential area and Carriageworks will be significant and unacceptable.

REDWatch notes the proposal, from residents in 501 Wilson Street, that construction traffic access should be done via the railway access road that is used to access the site for rail activity. REDWatch would encourage TfNSW / TAHE to explore this option. REDWatch understands that such an access may move the impact to residents in Erskineville and Macdonaldtown.

If waste, materials and contamination need to move towards Alexandria then this suggestion should be seriously considered. This is particularly important as part of the decontamination of the site. With over a hundred years of paint, varnishes and solvents used on the Paint Shop as well as well as the decontamination of the Asbestos removal centre and general site de contamination this waste

should be kept as far as possible away from members of the public including the surrounding community.

To minimise impacts on Little Eveleigh Street's new shared pedestrian path funnelling people to Sydney University and in front of Carriageworks (impacting events and performances and activities), the proposed Shepherd Street entrance needs to be completed at the beginning of the development so all servicing that cannot take place via the rail access road can take place through the Shepherd Street entrance.

REDWatch notes from the documents that the Shepherd Street entrance is very steep and is too steep for pedestrian access. The master plan does not adequately deal with how the slope on the proposed access road will work in the way proposed. REDWatch notes that a similar proposal to use Golden Grove Street to access the western end of the site was rejected by the RWA as impractical on the basis of detailed advice from the then traffic consultants Parsons Brinckerhoff. REDWatch notes this traffic study does not assess the issues around the road gradient and its implications, or line of sight and breaking distances coming up the steep incline to the Wilson Street cycleway.

The current proposal's street layout is dependent on the access gradient being safely achieved but these complexities are not addressed at all in the traffic study even though the steep gradient is referenced. If the site layout will in part be determined by this entrance this needs to be determined at the planning proposal stage and not left for the developer to work out at a later stage. How the four metre height difference is dealt with is central to the layout of this site.

REDWatch is also concerned not only with construction site access along Little Eveleigh Street but also with the proposal that one way operational egress from the precinct will happen across the new shared pathway to the University.

In addition, the current proposal to exit via Ivy lane, rather than Wilson Street, creates an increased accident risk at Lawson Street which appears not to have been assessed in the traffic study. Lawson Street has its own high pedestrian and car volumes to be negotiated coming out of a narrow lane but it is also a couple of car lengths from the Abercrombie Street intersection.

That intersection has a green arrow slipstream for traffic headed east into Lawson Street. A right turn into Lawson Street is hence very dangerous. When Little Eveleigh Street was closed to Wilson Street the intersection was signposted with a no right turn sign, however with locals and even police ignoring it due to the difficulty of getting back to Lawson Street to head east, the sign kept disappearing and finally Council stopped replacing it. The lack of a sign however does not override that it is dangerously close to an intersection with little visibility.

These issues need to be assessed properly in the traffic study and re-examined in an updated master plan brought back for discussion with the community.

Lack of usable Public Recreation Space in master plan

Darlington and East Newtown have little public open space. Charles Kiernan Reserve in Darlington and Ward Park in Newtown are loved to death with areas often fenced off to allow grass to regenerate. North Eveleigh has to deliver more usable public open space.

The exhibited proposal, while claiming significant public open space, does this primarily by defining any space not built on as public open space. When you overlay across the site the proposed roads, pedestrian walkways and cycle ways there is little contiguous open space suitable for active recreational activities. None of the supposed public open space is dedicated RE1 Recreational and none is proposed to be divested in perpetuity to Council.

This looks very much as though public spaces have been declared in places where buildings are not placed rather than there being active thought given to what is needed for public open space in the area. Again this is an area where Council has greater knowledge and experience than TfNSW / TAHE or DPE.

REDWatch has mentioned previously that the “park” proposed to face Wilson Street is really a landscaped disability access area, rather than usable public open space. In revising the proposal REDWatch encourages TfNSW / TAHE to closely consult Council on public space needs and to zone accordingly for public recreation. REDWatch also recommends that TfNSW / TAHE as part of reviewing vehicle gradient also explore more compact ways of providing disability access so public recreation space can be provided other than as landscaping around an access path.

The public space provision needs to provide spaces for all ages and this needs to be planned. In particular provision needs to be made for children, youth, older people and those with less abilities.

Sub-division, Site Ownership and Management

The master plan does not propose a subdivision of the site. It does not propose roads and footpaths that are dedicated back to Council nor does it propose areas zoned for public recreation. In the absence of a proposed sub-division there is little certainty for community that the proposed master plan will be delivered and that community benefit will be achieved. South Eveleigh was subdivided prior to sale and even though it will take 25 years for roads and public areas to be transferred back to Council, there is a plan.

In South Eveleigh to protect public access and use UrbanGrowth NSW put in place easements and positive covenants to ensure ongoing public use and access to the site when it passed to private hands.

Proposing a site wide FSR to be allocated by a design guide leaves the only real LEP site control to be the height control which preferences height over larger floorplates.

To provide greater certainty for the community REDWatch would prefer TfNSW / TAHE to finalise a master plan with the community and then to subdivide the site and only then allocate FSRs to the resultant development blocks.

Long Term Investment for Viability

During the Visioning sessions speakers placed emphasis on the need for an ongoing long term investment by the party running the site if the development was to be successful in the long term. REDWatch is concerned that TfNSW / TAHE are more interested in what they can extract as a price for the sale of the site rather than finding a development partner that might pay less up front but commit ongoing funding to make the development work as envisaged in the long term. There is a risk that a developer may buy and build and then on sell a fragmented site with no commitment to longer term place making.

From the visioning, community buy in and support were seen as crucial to the success of the precinct redevelopment. The planning controls seem less designed to address community concerns and provide certainty and more to allow the successful buyer maximum flexibility. REDWatch wants to see a slower staged process that starts with a community discussion around an amended master plan.

Affordable and Diverse Housing?

The planning proposal dedicates 15% of GFA to affordable housing, with no proposed social housing. This is contrary to the media release provided by Minister Rob Stokes, “We’ve set a historic target of

30 per cent diverse housing, half of which must be social and affordable housing”. REDWatch was unable to identify any commitment to diverse or social housing in the two overarching planning documents, ‘Explanation of Intended Effect’ and the ‘Design Guide’.

Minister Stokes is quoted in the Sun-Herald of August 21 under the Heading “Public Housing could house essential staff” as saying “a 30 per cent target for affordable and diverse housing should be considered for future projects on government land”. “Stokes also said it was up to the state-owned corporation Transport Asset Holding Entity to focus on “how they can use their land to meet housing justice”.

It seems as if the Minister has a view that is not yet fully reflected in the master plan documents. A 30% target could fit within Council’s aim of having a minimum target of 25% social and affordable housing and a minimum target of 10% culturally appropriate Aboriginal and Torres Strait Islander affordable housing but it is not in the proposal documents.

The planning report states that, “The Redfern North Eveleigh Precinct – being a large scale, State Government-led urban renewal project – provides the opportunity to make a visible commitment to affordable housing supply”. REDWatch would question whether 15% affordable housing which equates to roughly 67 dwellings, really is a ‘visible commitment’.

It is important to state that REDWatch will only support affordable housing that is in perpetuity and is run by an accredited Community Housing Provider. The ten year land banking form of affordable housing was neither affordable in the inner city and we are now starting to see those that were in such housing being forced out or needing to pay full market rent as the 10 year requirement expires.

There may be a similar issue with what is classed as “diverse” housing. In General terms REDWatch supports Build-to-Rent housing. Housing provided by a registered Community Housing Provider (CHP) is a form of Build-to-Rent. There are also very high end Build-to-Rent models but these are not aimed at essential workers who have difficulty getting housing close to the city. Build-to-Rent is a commercial product and unless it is aimed at key-workers and those who work in the city but cannot afford to live in the city, Built-to-Rent should not be considered as diverse housing.

As REDWatch has seen at the Waterloo Metro site residential can easily be converted to student housing, again this should not be classed as diverse housing unless it was to specifically provide affordable housing for students. Commercial student housing in the area is not affordable for students on low incomes.

REDWatch hence supports Minister Stokes aspiration for 30% of the site to be affordable housing in some form. This should also meet Council requirements. The revised master plan and supporting documents need to be changed to reflect the 30% affordable housing goal.

To highlight the housing crisis gripping Australia, a report by the Australian Institute of Health and Welfare in 2021 found that between 2001 and 2021, there has been a decline in the proportion of households owning their home without a mortgage, an increase in households with a mortgage and more households in private rental agreements. Low-income households renting in the private market doubled in 2018 compared to 1998.

Over half of those privately renting are experiencing rental stress, spending more than 30% of their net income on rent. Further, less than 1% of rental properties in Metropolitan Sydney are affordable to low-income households. In light of the considerable stress that our housing system is under, the planning proposal must optimise the opportunity to increase affordable housing above 15% for the site. This would go some way to ensuring low-middle income workers including nurses and teachers have an affordable home close to employment.

The proposal must also include a minimum of 15% social housing given that the social housing waiting list for the inner city is over 10 years, and homelessness has increased 14% between 2011 and 2016. The supply of social housing would go some way to ameliorate the worrying trend of overall social housing disinvestment. The proportion of social housing as a share of all housing types has fallen from 7% in the early 1990s to under 4% today while the need for housing has increased.

Aboriginal Affordable Housing required as part of the proposal

REDWatch is a supporter of the Redfern Waterloo Aboriginal Affordable Housing Campaign and helped in its establishment. Gentrification in the inner city especially around Redfern and Waterloo has had a major impact on the Aboriginal communities that have lived in the area. Many of those that grew up in the area and work in the area can no longer afford to live in the area they associate with and where the services are that they use.

While it is great that the proposal acknowledges “Connecting to Country” and has an Aboriginal art strategy, these will matter little if there is no longer a viable Aboriginal community able to live in the area. The community both black and white want to see a viable Aboriginal community in the area rather than interpretation of its historical importance to those that have been pushed out yet again.

Aboriginal Affordable housing is crucial for those working in, and with long term associations to the area. Aboriginal youth and working people need to remain in the community otherwise the community becomes hollowed out. The area is moving towards having two extremes of Aboriginal people that have high incomes, or who privately own a house at one end and those in public housing at the other whose kids have to move away when they get a job or if they work locally.

These issues were raised during the visioning stage by the community. They are acknowledged in the Aboriginal Heritage Interpretation Strategy. Yet there is no tangible undertaking in the proposal to address these concerns from the Aboriginal and wider community.

The master plan for the redevelopment of government controlled land, which was never ceded, must include at least a commitment for 10% dedicated Aboriginal affordable housing.

Proposed Planning Controls are opposed

Given our numerous concerns detailed above about the proposed paint shop master plan REDWatch cannot support the proposed planning controls that flow from the master plan.

Proposed LEP Heritage Map

REDWatch objects to the proposed heritage map. REDWatch supports a modified map transitioning to the Sydney LEP. REDWatch has already stated earlier in this submission that the proposed heritage map for the LEP needs to include all “Exceptional” and “High” heritage value items rather than pretend they are not there. These items then need to be dealt with in an appropriate matter reflecting their heritage importance.

Proposed LEP Building Height Map

As the master plan is inadequate REDWatch must object to both the proposed heights and locations shown. REDWatch has argued in this submission that there is a need to consider how the larger floor plates will work on this heritage constrained site. The proponents have opted for a high-rise strategy which is not in keeping with the southern side of the former Eveleigh Railway Workshops. REDWatch has also suggested that residential sympathetic to the conservation area needs to be explored along Wilson Street.

REDWatch is especially concerned that the paint shop has a proposed height other than the existing height which has been extended to all other heritage buildings with exception heritage value. On this basis alone REDWatch could not support the proposed height map.

REDWatch also recognises that the excessive height is driven by the proposal placing higher FSRs on a heritage constrained site.

Proposed LEP Floor Space Map

REDWatch has a number of concerns about the allocation of FSR.

Firstly REDWatch questions the ability of the proponent to claim FSR over SP2 Railways land on which it cannot develop. This area was not included in the site for the 2008 master plan on the basis that such land could not be built on. REDWatch is not aware if there has been a subsequent planning change that would permit FSR over the SP2 zoned land.

REDWatch notes that an FSR of 2.78 is claimed across the entire site including parks, roads and footpaths and that the allocation of the FSR is left to a lower level design guide. REDWatch is of the view that alongside the more work required in the master plan, that a new FSR map should be produced allocating FSR to development sites once better defined.

REDWatch also has concerns about the proposed 2.78 FSR being also allocated across existing heritage buildings that are not or should not be redeveloped.

REDWatch also objects to the significant increase in FSR proposed over the existing 2006 2:1 FSR controls. This equates to a 39% increase plus the increase over now included SP2 Railway land.

The master plan has not demonstrated that on such a heritage restrained site that a 40% increase in FSR is possible while retaining heritage, interface with the conservation area and symmetry with the southern portion of the former Eveleigh Railway Workshops.

For all these reasons REDWatch cannot support the proposed FSR map nor the proposal to allocate FSRs outside of the LEP through a more easily changed process on the lesser important design guide.

Proposed Land Use Map

REDWatch objects to the proposed land use zoning because it does not specify and protect recreational space. Leaving a B4 zoning across the site means that none of the site is passed to Council for use as public recreation space in perpetuity. REDWatch has seen this issue in the Waterloo Estate where the large park has been zoned recreational so it remains as public recreational land rather than as private land that could be redeveloped at a later date.

REDWatch has argued that there needs to be more work done on the master plan and that part of that work needs to be to define recreational space that should be dedicated to Council.

Conclusion

The community have not had the opportunity to be involved in discussions with TfNSW / TAHE regarding the proposed master plan following the visioning stage. They have also not been able to engage with Council regarding its alternative plan. The exhibited master plan and resultant proposed planning controls do not have community support as a result of the lack of engagement with the community in developing the plan.

As a result REDWatch proposes that the Proposal for the Paint Shop Precinct should not proceed in the current form. REDWatch proposes that TfNSW / TAHE needs to take on board the submission input from the community, Council and other stakeholders and then come back to the community for pre-lodgement engagement over a modified proposal that responds to community concerns.

As REDWatch has pointed out at the beginning of our submission there is a risk for TfNSW, TAHE and potential developers if Government decide to push through the current proposal against community objections. Such risk is likely to be factored in by bidders. As an example a developer purchasing the site will have community expectations to build a bridge and find a way of not developing above the Paint Shop among other community expectations. The developer will likely build that into what they are prepared to pay the TAHE for the site.

Government's interest in developing this site is best served by engaging with Council and residents to address the concerns raised before bringing an amended master plan and new planning controls back for formal exhibition.

Thank you for the opportunity to comment on this proposal

For Further Information, contact:

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REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area originally covered by the Redfern Waterloo Authority). REDWatch monitors government activities in the area and seeks to ensure community involvement in all decisions made about the area. More details can be found at www.redwatch.org.au.