

SUBMISSION

to the

DRAFT STATE ENVIRONMENTAL PLANNING POLICY (Major Projects) -AMENDMENT (REDFERN-WATERLOO) 2006

and to the

DRAFT REDFERN WATERLOO BUILT ENVIRONMENT PLAN 2006

prepared on behalf of the

ABORIGINAL HOUSING COMPANY

by

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EXECUTIVE SUMMARY

Both the draft Redfern Waterloo Built Environment Plan (BEP) and draft State Environment Planning Policy (SEPP) fail in every respect to plan properly for the land referred to by the BEP as “*Area D*” that includes land owned by the Aboriginal Housing Company (AHC). The objections in this submission relate particularly to the density controls (residential floor space ratios - FSR) imposed on the AHC’s land and the zoning of a key AHC redevelopment site, toward Lawson Street, as recreational open space.

Specifically, on the issue of FSR, both documents halve the residential development potential of the land compared to the existing planning controls contained in the South Sydney Local Environment Plan 1998. Neither document provides any justification for reducing the residential development potential of the AHC’s land.

Even allowing for the addition of the “mixed uses” floor space density in “*Area D*”, the total amount permitted falls far short of the total amount of floor space permitted by the BEP and SEPP in all other areas in the immediate vicinity. For instance “*Area D*” is allocated only a quarter or less of the residential floor space that other areas of similar or greater distance from the Redfern railway station, as illustrated in Fig 1.

Proposed Floor Space Ratio for A, B, C, D, E and J		
	Proposed Maximum Residential FSR	Proposed Maximum FSR
	Note: The Residential FSR component should not exceed FSR indicated in 'Proposed Maximum Residential FSR' column	
A	2:1	2:1
B	0.5:1	2:1
C	1:1	2:1
D	0.5:1	1.5:1
E	1:1	3:1
J	1.5:1	1.5:1

Proposed Floor Space Ratio for F	
	Proposed Maximum FSR
F	7:1

Fig 1 - Source: NSW Government - Redfern Waterloo Authority - Draft Redfern Waterloo Built Environment Plan

The amount of floor space allocated to “*Area D*” fails to meet the stated Aims of the draft SEPP and also fails to meet the policies set out in the Sydney Metropolitan Strategy. Both the Aims and Policies require development to be concentrated near railway stations. In regard to “*Area D*” both the draft BEP and draft SEPP clearly fail to allow residential development to be concentrated near the Redfern railway station, especially on land owned by the AHC.

To remain consistent with the rest of the BEP, and the Sydney Metropolitan Strategy, “*Area D*” should be allocated a floor space density equivalent to the other areas in the immediate vicinity the same distance to the railway station.

“*Area D*” in Sector Z should remain to a degree a residential area with a FSR of 3:1 (with a further FSR of 1:1 for other mixed uses) and height controls from 3 to 8 storeys to effect the transition from the adjoining residential area to the areas near the railway station. AHC land with proposed zone of recreational open space should be allocated a zoning of mixed use business consistent with the rest of “*Area D*”. Area E could retain the proposed controls.

THE OBJECTION

1. THE DRAFT REDFERN -WATERLOO BUILT ENVIRONMENT PLAN

Although much has been said about the imperative to renew the AHC’s land in Redfern, in the lead up to the release of the draft BEP, “*Area D*” rates little mention in the document with the exception of Section 3 titled “Strategies for Revitalising Redfern-Waterloo”, where the proposed controls are identified, but not justified.

The draft BEP is severely deficient in that it does not review the existing controls or provide any justification for the significant reduction to the residential development potential of the land in “*Area D*”.

The draft BEP claims that it has been prepared to be consistent with the Metropolitan Strategy, but in relation to the AHC’s land that is an unfortunate and incorrect claim. Compared to the other Sectors in the Plan, the AHC and the other property owners in “*Area D*” have been very poorly treated without any explanation. There is no planning justification for the resulting lower residential density controls.

- A.** In regard to Aim (a) above it can be said that for three of the Sectors around the Redfern railway station the draft SEPP provides for the redevelopment of the area in a manner consistent with the Sydney Metropolitan Strategy.

(For the purpose of this Objection the Redfern Waterloo area has been divided into 4 sectors by the north western boundary of the railway property and Lawson Street with the railway station as the centre point. The western boundary of the railway lands has been selected, rather than the railway lines so that Zone G on the Zone Plan accompanying the SEPP is in the one sector and not divided).

(Again referring to the Zone Map, and to avoid confusion with the mixed lettering on the 3 Maps in the SEPP and the Map in the BEP, the north eastern sector can be labeled W, the south eastern X, the south western Y, and the north western Z. Sector Z includes the AHC land, and opposite that is Sector X the proposed “main employment area”).

The planning for Sector Z is not consistent with the provisions of the Metropolitan Strategy in that the SEPP does not maximize residential opportunities adjacent to a transport node, refer to Fig 2. In contrast to Sector Z the SEPP does maximize development opportunity (for residential and business) in the other 3 sectors around the transport node.

- B.** In regard to Aim (b) the SEPP increases the building density around Redfern railway station and especially for the Sectors W, X and Y. For Sector Z it increases the overall density and allows “mixed use” but decreases the residential density allowed.

For example, examination of the Floor Space Ratio (FSR) Map (the main control for building density) reveals that area A (part of Sector Y) most distant from the railway station has an allowable residential density of 2:1. “Area D” (part of Sector Z including the AHC land) and closest to the railway station has an allowable residential density of 0.5:1 (with the addition of mixed uses of up to 1.5:1). Also in Sector Z and further from the railway station is Area E the proposed residential density is 1:1 with additional mixed use density of 2:1.

The existing City of Sydney (formerly South Sydney) controls provide for a density of 1:1 in “Area D” and 1.5:1 in Area E. The AHC’s land is zoned residential with the FSR of 1:1 for the residential use.

It should be noted that a residential density of 0.5:1 is about the density that would cover an average sized family detached home in the suburbs of Sydney.

For Sector Z (including the AHC land) the SEPP does not meet its Aims (a) and (b) and fails to come even close to the principles in the Metropolitan

Strategy for Sydney, and rather than increase building density around Redfern railway station, it significantly decreases residential density in Sector Z.

3. RECREATIONAL OPEN SPACE ZONING

A significant portion of AHC land along the eastern side of “*Area D*” adjacent the railway tracks represented a potential commercial redevelopment site but has been inappropriately zoned recreational open space, with little or no planning justification. In particular, the proposed location of the recreational open space has not been justified or tested in terms of crime prevention or safety by design.

4. A BETTER PLANNING RESULT FOR SECTOR Z

Inspection of Sector Z and the surrounding locality reveals that “*Area D*” in the draft BEP would be better identified as a medium density residential zone with a residential FSR of about 3:1. There is little mixed use activity in “*Area D*” at present, and its addition in the right locations with an additional 1:1 FSR would benefit the locality. Variable height controls across the area could be utilised to cover the transition from the adjoining 2 storey neighbourhood progressively building up to 8 storeys closer to the railway station.

The AHC land that has been zoned recreational open space in the SEPP and BEP should have a similar mixed use business zoning consistent to the rest of “*Area D*” in Sector Z with an FSR constant with the overall recommendations in this submission. The provision and location of appropriate open space can be resolved at the DA stage.

In the same context, Area E in Sector Z could retain its currently proposed controls allowing the higher level of mixed use in an area where there is a reasonable level of existing mixed use activity. It is also an area that has good accessibility to a main road without the need to traverse extensively through residential areas and therefore more appropriately used for mixed uses.

5. CONCLUSION

The proposed SEPP (Major Projects) Amendment (Redfern-Waterloo) Policy 2006 halves the permissible residential density in “*Area D*” of Sector Z. Neither the draft BEP nor the draft SEPP provides explanation or justification for the changes that effectively halve the residential development potential, treats adjoining areas inconsistently and thus reduces the value of the land.

Close examination of the area owned by the AHC, consideration of the previous development controls and the recently released Metropolitan Strategy for Sydney point to a very different planning solution for Sector Z than the one currently proposed.

To be consistent with the Sydney Metropolitan Strategy and the other density allocations in the draft SEPP and draft BEP; to make better use of a highly accessible transport node; and to be compatible with adjoining land uses, “*Area D*” in Sector Z should remain to a degree a residential area with a FSR of 3:1 (with a further FSR of 1:1 for other mixed uses) and height controls from 3 to 8 storeys to effect the transition from the adjoining residential area to the areas near the railway station. AHC land with proposed zone of recreational open space should be allocated a zoning of mixed use business consistent with the rest of “*Area D*”. Area E in Sector Z could retain the proposed controls.

The changes described above should be made to the draft BEP and draft SEPP to ensure for better planning outcomes for Redfern and to ensure the draft SEPP remains consistent with its own aims and those of the Metropolitan Strategy for Sydney.