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13 April 2006

Robert Domm CEO Redfern-Waterloo Authority PO Box 3332 Redfern NSW 2016

Dear Mr Domm

Redfern Waterloo Authority Draft Built Environment Plan

I make this submission to the Redfern Waterloo Authority's draft Built Environment Plan as the Member for Bligh, which includes the suburbs of Darlington and Redfern that are included in the draft plan.

These plans propose substantial changes in Redfern, Eveleigh, Darlington and Waterloo that will dramatically increase building heights and densities without supporting infrastructure, open space, public domain, community facilities or transport.

The only certainty is that the generous planning controls will be written into law via the State Environmental Planning Policy (SEPP.

While the RWA draft Built Environment Plan SEPP and promise "a strategic planning framework to facilitate the area's economic growth", they are essentially about development, and appear to differ little from the ill-conceived 2003 "RED Strategy" that resulted in community criticism.

I strongly oppose the current zoning and controls being implemented without supporting action to promote residential amenity, green open space, and heritage, and to provide essential community facilities and public transport.

Planning controls will apply to eight mainly publicly owned sites in order to attract development, but there is no evidence to support that this additional commercial and residential space will be taken up. I share community concern about the Government providing cheap access to community-owned land that can never be regained. I particularly oppose railway land being sold off without a metropolitan transport blueprint indicating whether or not such sites might be needed for extra rail line, station expansion or bus/rail/light rail interchange.

Despite glossy "artist's impression" images of Lawson Square without multiple lanes of traffic and Redfern Railway Station redeveloped as a Town Centre, there is little detail about when, how, or even if these visions can be achieved. Given that the Government has been working on these matters since initiation of the Redfern Waterloo Partnership Project, there is little to show for more than four years of planning for the area.

There is nothing in the Built Environment Plan about protection of heritage buildings despite the area having significant railway and cultural heritage. I oppose the Redfern Waterloo Authority overriding heritage controls, and believe that the Authority should carry out a Heritage Review before redevelopment.

Member for BLIGH

Clover Moore

Despite 18,000 new jobs and 2,000 new residences predicted, there will be a net loss of open space under the draft plan, and the rezoning of existing Marion Street Park for 18 storey development is irresponsible and outrageous. Redfern has one of the lowest ratios of open space per person in the State, yet there's been no attempt to address this, notwithstanding that most of the relevant sites are public property.

There is no significant impact assessment of development controls, which promote four to six times the existing building heights and densities. The proposed new Town Centre based on the Railway Station, with buildings up to 18 storeys proposed for Regent and Gibbons Streets will impact on views, sun access and existing open space in surrounding areas including Marian Street.

There is no funding or timeframe for what is an urgently-needed upgrade including disability access for Redfern Railway Station. This is despite the former Redfern Waterloo Partnership Project having listed it as a high priority since 2002. The Roads and Traffic Authority has not agreed to any action on area road traffic and has been long committed to the Regent and Gibbons Streets two-way pair. The draft Built Environment Plan offers no alternative traffic measures.

New height limits between three and five storeys imply demolition of all existing housing and warehousing in Eveleigh Street and "The Block'. It will be difficult for the Aboriginal Housing Company to realise its Pemulwuy Project under the new controls, which allow for only 30 homes, instead of the 62 planned by the AHC. I share community concern that the RWA seeks to remove Aboriginal people from this precinct, and I abhor the lack of consultation with the Aboriginal community about the Pemulwuy Project which has been in development for some time.

The "iconic" building up to 16 storeys proposed for Eveleigh North, with new three-storey height limits along Wilson Street and new height limits over important railway heritage buildings implies demolition or major change in this precinct as well. There is no information on protecting nearby residents from traffic and other impacts, and the Darlington Village local plans developed by residents with the former South Sydney City Council over a number of years, look to be overridden.

New height limits up to 12 storeys proposed for South Eveleigh, with new commercial uses near existing homes will have residential impacts but there is no evidence that these have been assessed. New height limits over heritage buildings imply that they also face demolition. I will continue to work with residents and concerned organisations to get proper recognition and restoration of Eveleigh as a site of national and city significance.

The draft Built Environment Plan provides for residential development of Rachel Forster Hospital, with the site probably sold to a private developer. No consideration is given to public open space on the site, local linkages or important community facilities that the community has identified as needed. Many local residents have pushed for needed community facilities since the hospital was closed. These facilities and amenities should be specified and guaranteed in a Development Control Plan for the site.

The allowed maximum height of six storeys seems to mean demolition of the Redfern Police Station, with the heritage Court House to be overshadowed. I am also concerned that homes in Turner and Pitt Streets could lose sun access.

Serviced apartments or a hotel will be allowed on the Redfern Public School site, with four storey height limits opposite two storey terraces in George Street. Current open space is not specified or guaranteed in the rezoning.

Nine to 11 storey development is proposed for the Australian Technology Park, massively

exceeding the height of the current railway sheds, which are only about six storeys. New commercial activities and residential accommodation has not been matched with the required community infrastructure.

Redfern and Waterloo Department of Housing properties are listed for consideration in Stage 2 of the plan – after the March 2007 election. I share social housing tenants' concern that their future should be protected as part of the Government's Built Environment Plan. Public tenants must be involved with any decisions about the future of their homes and their quality of life, with measures to reduce disruption and impacts from future redevelopment.

The draft Built Environment Plan proposes extending CBD-style office blocks into Redfern, bringing more people without new infrastructure. The SEPP promotes development growth, but not open space, public domain, improved transport, or supporting services.

The Built Environment Plan threatens public assets and heritage including the Eveleigh Railyards, Redfern Public School, Redfern Court House, conservation areas and heritage streetscapes that are designated for development.

I am surprised and disappointed that a responsible authority would sponsor such a piecemeal approach to city planning. I believe that it is an abnegation of process and an affront to people's expectations to enshrine in law, galloping development permits without supporting infrastructure, facilities and services, planned increases in open and recreational space, and a cultural and heritage strategy.

As a minimum, the following actions must preface the draft Plan and SEPP assessments.

- 1. A supporting infrastructure plan developed with funding strategies, including for transport, services, and open space.
- 2. A transport blueprint which examines the possible roles of the Redfern Rail corridor and associated land for present and future transport needs. The upgrading of Redfern Railway Station is part of this, and should be an urgent funded priority.
- 3. A review of development impacts including proposed height limits to better protect sun access, views and heritage.
- 4. A consultation plan for public tenants affected by proposed "Stage 2" public housing redevelopment.
- 5. An implementation strategy that coordinates the Built Environment Plan with the RWA's Employment and Enterprise Plan and Human Services Plan.
- 6. A detailed heritage review to ensure protection of local heritage and cultural sites at each of the nominated development sites.
- 7. Contribution plans for affordable housing and area development.

Yours sincerely

Clover Moore Member for Bligh