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Chippendale Heritage Village
 Coalition Chippendale Community Groups
 Email: communityworkingparty@yahoo.com.au

14 April 2006

Robert Domm
 Chief Executive Officer
 Redfern Waterloo Authority
 PO Box 3332
 REDFERN NSW 2016

Dear Robert

**REDFERN – WATERLOO
 DRAFT BUILT ENVIRONMENT PLAN – STAGE ONE & DRAFT SEPP**

Firstly, we'd like to alert you to deficiencies in the current consultation process, before making comment to the proposed planning controls.

We appreciate you are familiar with our heritage village and the challenges this community has long faced, both in terms of environmental and social impact.

Given the proposed changes to Redfern-Waterloo, we appreciate your recent undertaking to include Chippendale in the consultation process.

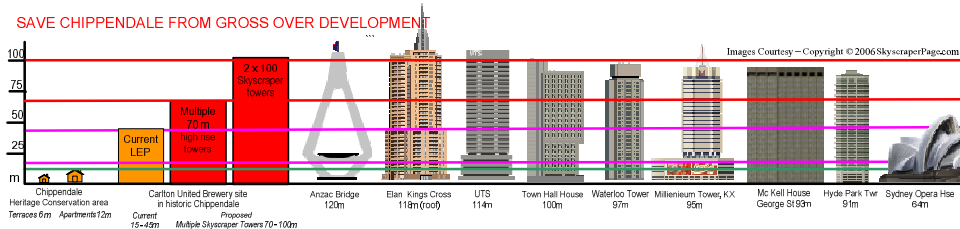
Indeed for many local residents, the impact from The Block and proposed Redfern Town Centre is not only geographically closer than other parts of Chippendale but has more effect on their daily lives.

However, despite your assurances, we note that invitations extended to Chippendale residents to attend focus groups were withdrawn because these residents live outside the RWA's operational area.

In short, our community which faces not only the intense high rise urbanisation on the Carlton United Brewery (CUB) site as well as 300 metres to the south, the redevelopment of The Block and a little further, the proposed new Redfern Town Centre, has not had equal access and equity during the consultation process.

Given the cumulative impact these redevelopments have together, we believe it critical that focus groups be convened so this community's feedback can be taken on board.

Notwithstanding this, we note our comments to the proposed planning controls in relation to the draft Redfern-Waterloo Environment Plan (Stage One) ("BEP") and draft SEPP, as follows:





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1. Understanding Chippendale and its context in terms of Redfern-Waterloo redevelopment

Chippendale is a diverse and low scale heritage village, with the greater part designated as a Heritage Conservation Area.

Located to city's southern edge, Chippendale lies between the city and The Block/Darlington, which is adjacent to its immediate south.

To appreciate Chippendale's scale and context in relation to the Redfern-Waterloo redevelopment, the CUB site is located a little over 250 metres from Eveleigh Street precinct ("The Block") with the proposed Redfern Town Centre less than 500 metres from the CUB site.

In between is Chippendale's eastern precinct, largely a mixture of heritage housing and low scale pre and post war industrial architecture recognised as unique to the city's heritage. This precinct also houses a number of landmark buildings, including the Strickland Building, former Sydney City Mission and Mortuary Station.

Small in land area, Chippendale in 2001 had a residential population of 3,091 residents and 1,113 people who travel to Chippendale to work.

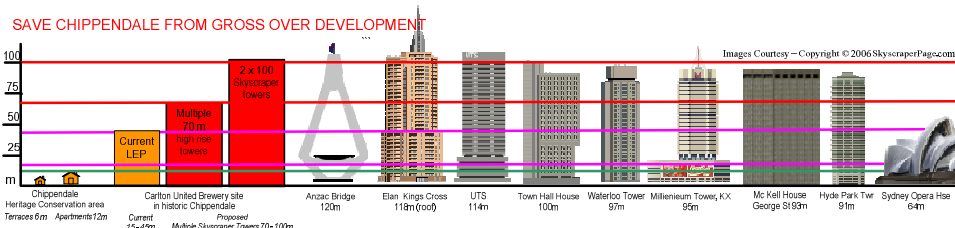
In addition, Chippendale has a large student population, with the recent addition of Notre Dame University and other regional and interstate Sydney campuses housed in the village.

Chippendale's gross area is approx 46 hectares in size (2001 ABS) however this includes large scale railway lands between Chippendale and Prince Alfred Park, as well as Central Station and the adjacent railway area. Without the railway lands, the land area is approx 36.4 hectares.

It is important to note that population density figures when compared with other nearby suburbs; whilst high, need to adjusted upwards, as ABS figures (2001) historically include railway lands nor reflect the significant number of new residential developments approved since 2001 or large commercial activity prevalent in Chippendale.

Existing environmental and social constraints marginalise Chippendale. These include:

- The lowest open space per resident in Sydney; i.e. only 1.36 sqm per resident against a minimum provision of 6.6 sqm (CoS) and median for Sydney Region of 29.52 sqm. These figures do not include the significant number of new apartment buildings approved and built since 2001.
- The significant population growth (over 750 new units) and large scale commercial development (Lee Street) that has occurred since 2001.





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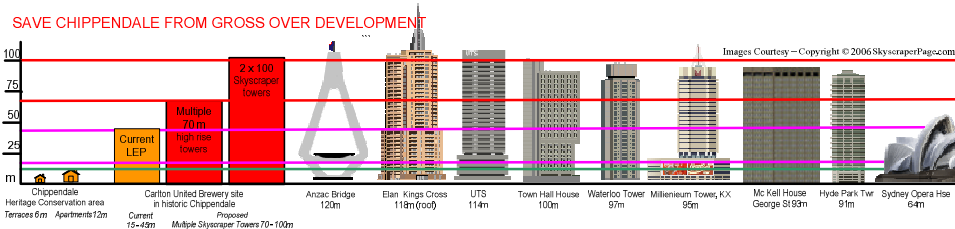
- Chippendale already has an existing high residential density which does not take into account, large scale commercial activity and educational use. As at 2001, Chippendale’s population density was 89.04 people per hectare - adjusted for the large tract of railway lands. Since 2001, there has been approx. 750 new residential dwellings (refer CoS Residential Monitor June 2005).
- Extremely high traffic counts - more than 1.7 million vehicle movements (RTA AADT 2002) travel through Chippendale each week on the four state roads that ring the village and the fifth, which divides Chippendale into two.
- Continuing high traffic growth on Cleveland, Regent and Abercrombie Streets. These roads not only link Chippendale with Redfern - Waterloo but are the main north - south toll free axis taking high volume container movement from Port Botany to the Anzac Bridge. By 2020 it is expected freight movement will double.
- State roads that effectively act as barriers preventing access and equity to public areas outside the village.
- Extremely high pollution counts - mainly carbon monoxide - refer National Pollution Index – 2003, ie CUB site on Broadway. Given the amount of vehicles, road system and topography, we estimate pollution in the residential precinct bounded by Abercrombie, Regent & Cleveland Street is significantly larger and evidence indicates it is residents health and wellbeing.
- One of the lowest community facilities provisions within the CoS LGA – 0.25 sqm per resident.
- Long standing safety and crime statistics - largely the consequence of its location, the lack of an active after hours on-street presence and Chippendale’s isolation from adjoining suburbs due to the road system.
- Infrastructure constraints - including sewerage, local infrastructure and parking constraints. The existing system is regarded as at capacity.

Yet, despite these constraints, the CUB redevelopment proposes to nearly double Chippendale’s total population (including the non residential population) whilst the first stage of the BEP for Redfern – Waterloo proposes to more than double Redfern-Waterloo’s existing working population and add a further 4,000 residents.

In summary, approx 30,000 residents/workers are proposed to be absorbed into an area, already facing severe environmental constraints; essentially a narrow north - south axis less than 1 km in length from the Australian Technology Park to the south and the CUB site in the north.

In addition, another 12,000 residents have previously been indicated as part of the second stage of the Redfern-Waterloo BEP.

To accommodate this high rise urbanisation, a new Local Environmental Plan is proposed for the CUB site and a draft Built Environmental Plan (BEP) for Redfern – Waterloo as well as changes to the State Environmental planning controls.





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Whilst open space has been planned for the CUB site, given the high population growth both in terms of residents and commercial activity, the proposed park of 5,000 square metres will do little to offset the deficiency in accessible green space in Chippendale.

The resulting traffic increase from these developments raises significant concerns in relation to local as well as regional traffic. This is because Chippendale carries such high traffic volumes; effectively it carries the major toll free north - south routes, as well as east - west and provides the major access route to the city's south.

The absence of an open space as well as traffic and transport needs study for Redfern-Waterloo, as part of the draft BEP, raises significant concerns about the assessment of the proposed Plans as well impact from existing environmental constraints for Chippendale and its adjacent villages.

2. Overall density - size and scale of development is unsustainable and socially irresponsible

Given the extent of redevelopment along what is essentially a narrow north-south axis through Redfern-Waterloo-Darlington and Chippendale, we believe the overall impact on the adjacent communities, when considered collectively and holistically is totally inappropriate and will result in existing residential communities being disenfranchised with major environmental and social consequences.

Whilst we understand separate Authorities are managing the planning process, we believe the social and environmental impact on these communities is enormous and cannot be considered separately.

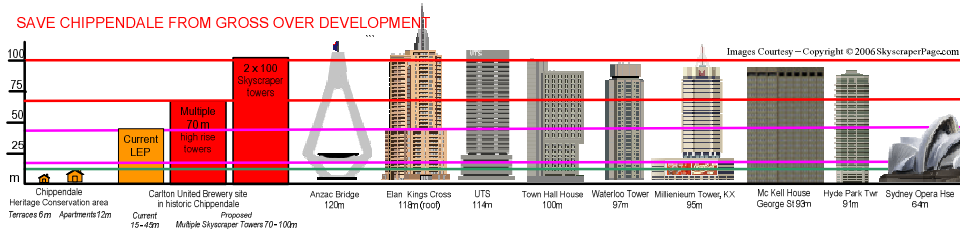
Current estimates indicate the proposed plans result in approx. 30,000 additional workers/residents as a consequence of the first stage of the Redfern - Waterloo and redevelopment of the CUB site, ie:

Redfern-Waterloo BEP - first stage		18,000 workers
		4,000 residents (2,000 dwellings)
CUB site	say	<u>8,000</u> total population growth
		30,000

Add: The second stage of the BEP for Redfern –Waterloo; previous Government estimates indicate:

Previous Government estimates		<u>12,000</u> second stage RWA - DOH
Total		42,000 residential and non residential growth

Note: these figures do not include continued student population growth or other developments.





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Compare this with an existing residential population base of 19,194 for Redfern-Waterloo (ABS 2001) and approx. 3,000 residents and 1,100 workers for Chippendale.

Whilst the draft BEP indicates an existing non-residential population base of 20,000 workers for Redfern - Waterloo, we note we have been unable to substantiate these figures; our own research indicates Redfern – Waterloo has a non-residential population (not including areas around Moore Park) of approx. 6,600 workers.

Given growth is earmarked along what is essentially a narrow north – south axis running from CUB site to ATP/Eveleigh South, the impact in terms of the immediate localities is not just a doubling of the local population but a 600% increase in some localities with impact on other areas not yet defined.

Here, we note the projected growth is considered a minimum, as the residential growth for Redfern Town Centre is not capped nor do we believe, the figures take into account, other developments which are separately approved, nor the impact from large scale redevelopment in nearby localities (e.g. Green Square) which are within close proximity to the Redfern - Waterloo area.

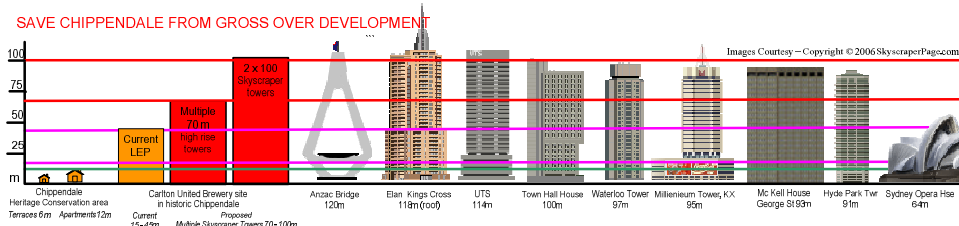
Given much of the data publicly provided, is based on assumptions 5 years old, ie 2001 ABS statistics, and in the absence of a detailed needs analysis, we have assessed the impact on the anticipated population growth in the case of Chippendale. This indicates anomalies in population projections in the Metropolitan Strategy and shows why further research is critical before the draft BEP can be properly considered.

In the case of Chippendale, our calculations indicate the likely density following the redevelopment of the CUB site will be:

- assuming the 2001 ABS population counts
 - add: say another 750 dwellings since (average household size of 1.99 persons)
 - plus: 1,700 residential apartments for the CUB site (average household size as above)
- = equates to nearly 222 persons/hectare.

Note: these figures do not include the large scale commercial and educational use already prevalent in Chippendale nor commercial redevelopment on the CUB site.

To this, add the impact from the redevelopment of The Block (with suggested commercial FSR incentives), less than 300 metres from the CUB site and large scale development of Redfern Town





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Centre; the overall impact on the existing communities such as Chippendale, The Block and Darlington becomes apparent.

Whilst the Government's recently released Metropolitan Strategy supports the large scale urbanisation of areas along the Global Arc, and targets a 72% increase in new dwellings and nearly 58,000 new jobs over the next twenty five years for the CoS LGA, the strategy ignores the constraints and needs of inner city village communities.

Whilst the Government has promised "80% of suburban streets are protected from increased density", in the case of these villages, the significant increased densities from residential growth and high rise commercialisation has a devastating impact on local communities who already face marginalisation from social and environmental constraints.

The Government's strategy effectively extends the Central Business District west and south along the Airport and Parramatta Road Corridor (with 85,000 new jobs are targeted for the City to the Airport and 50,000 for the City to Parramatta Corridor) ignoring existing streetscapes, environmental constraints and character of these heritage precincts and these communities social well being.

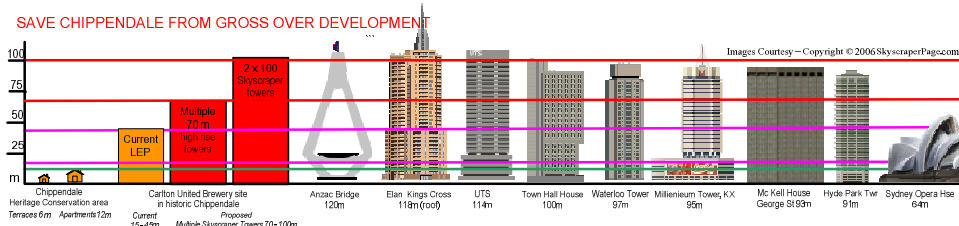
The proposed changes encourage high rise commercial use with FSR incentives in areas such as The Block; this strategy ignores existing social and environmental constraints by further exacerbating and effectively removing these existing residential communities from their villages.

Qualified as a step back in time - to a time when the car wasn't king and local populations were substantially larger, this strategy is misleading as these were times when our villages housed heavy industry and adjacent residential ghettos.

Whilst this strategy offers some comfort to other parts of Sydney, where no increase in densities are promised, the approach raises considerable concerns about the ability of these inner city communities, who are already seriously disadvantaged through environmental and social constraints, to absorb such high density population growth.

In short, without appropriate and low scale development, which is sympathetic and fits in with the character of these inner city village communities, not only will existing residential communities be isolated but the concept of the City of Villages destroyed - a concept which has widespread community support and grew out of the community evidence to the Sproates Enquiry.

By introducing large scale high rise towers and commercial land use, this creates a void between the new drive in and out high rise developments and residents who live in existing low rise communities. The end result are communities surrounded by vertical villages and commercial precincts devoid of





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pedestrian movement and interaction, particularly after hours and on weekends.

Without the appropriate housing mixes, the long term social impact on the existing residential communities is significant; weekend markets will do little to solve these issues. The scale, density and change in land use will encourage short term transient populations rather than longer term viable residential mixes.

Given nearly a third of land in the Redfern - Waterloo is owned by the State; with the majority of these lands proposed to be sold and redeveloped as the first stage of the Built Environmental Plan (BEP), we believe political considerations and property interests have clouded the debate.

Whilst we recognise the Government's strategy to absorb growth along existing infrastructure and transport routes, it is critical to consider existing environmental and infrastructure constraints, the social implications and impact on existing heritage as well as equity and access in assessing these plans.

In the present form, the proposed draft BEP and draft SEPP is inappropriate and socially irresponsible. It compromises the amenity of both existing and future development of inner city villages including the adjacent village of Chippendale.

In short, the proposed scale of development is something yet not seen in Sydney. It is a politically expedient way to absorb high population growth however at a significant cost to inner city communities.

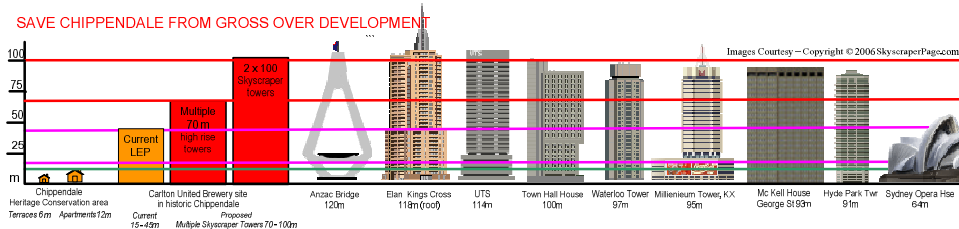
3. Height and land use mix - The Block (Eveleigh Street Precinct).

The draft plan proposes to significantly increase the FSR and Height controls for the Eveleigh Street precinct. As the immediate community adjacent to the Eveleigh Street Precinct to the north, we understand the social and environmental impact as a result of The Block particularly since the difficulties since the 1990s.

However despite these challenges, we question the Government's strategy to change the land use mix to commercial by increasing the FSR and reducing the FSR for residential use.

We believe other options exist which would encourage progressive changes including demystifying The Block and opening it up as a residential community, one which is an active part of the local streetscapes and acknowledged for its aboriginal significance and heritage by outside communities.

Here we strongly encourage more debate, with both the aboriginal communities as well as adjacent communities, and suggest this lead to revised plans and the opportunity for further review and comment.





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We do not believe increasing height controls to 5 storeys along Cleveland Street, opposite a Heritage Conservation Area is appropriate, and strongly recommend leaving the existing height controls in place.

Cleveland Street is essentially a small grade street, unfortunately carrying more and more large scale traffic movement. It has in part been subject to inappropriate development, however given the potential and impact on the conservation area and low scale development along this road, we urge the RWA to consider what can be done to support appropriate and low rise quality development, rather than encouraging 5 storey commercial use, as well considering a long term transport solution to reduce the pollution and environmental hazards which impact these surrounding and neighbouring communities.

We not believe promoting a change in land use by increasing the FSR for commercial use is a long term solution that best serves the existing or adjacent communities.

4. Height and FSR – Proposed Redfern Town Centre

Regent Street and the associated village areas have the potential to be wonderful low-rise heritage streetscape.

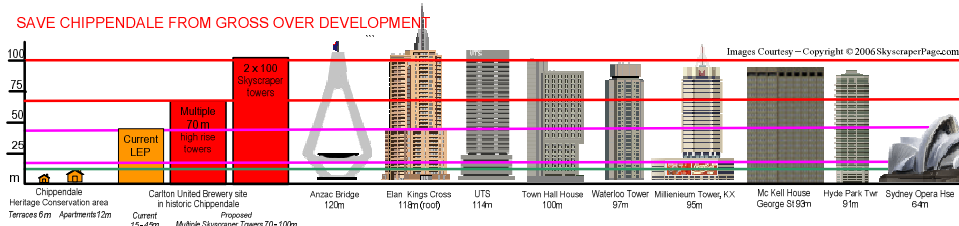
We strongly urge the Government to reconsider building heights in line with the existing scale and character of the area; and if necessary limit larger scale development to the ATP. Recent developments along Regent Street demonstrate in part how quickly the heritage streetscape can be lost and how important support to retain and enhance these shop fronts is.

Notwithstanding that insufficient information has been provided to assess the impact in terms of open space, traffic and environmental constraints, we believe the scale and height of 18 storey buildings has a large and detrimental impact on these local neighbourhoods - it will only result in another "Chatswood", rather than encourage the development of a progressive urban centre that enhances the existing communities.

We urge the Government to delay any decision making in this regard and instead undertake the appropriate needs studies, so the community can properly assess its impact and consider long term solutions that provide open space, traffic and transport and social and economic solutions which more adequately reflect the existing community's needs.

5. Removal of Heritage Controls

We do not support the removal of heritage controls and only see an advantage in terms of the marketplace. This is short gain at the community's long term loss. Further we believe any removal of heritage controls for Eveleigh railway yards must not occur.





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6. Open Space

Equity and access to public open green space is not only vital to the well being and social fabric of any community, but also provides social justice.

For these communities, many of which already live in the shadows of developments, and do not have suburban backyards and already face significant environmental constraints, equity and access is a more significant issue.

International standards indicate sufficient local open green space is critical, that which is easily accessible, usable, has good solar access for all types of users, is quiet and environmentally sound and within 10 minutes walking distance (400 metres) without any major road barriers.

Given our previous comments and considering the existing low open space and environmental constraints locally, we urge RWA to commission an independent and full needs analysis with recommendations for the amount of open green space and what development scenarios can be sustained to support various options before any plans are finalised.

These studies should be publicly exhibited, with sufficient time for community comment prior to any Plans being finalised.

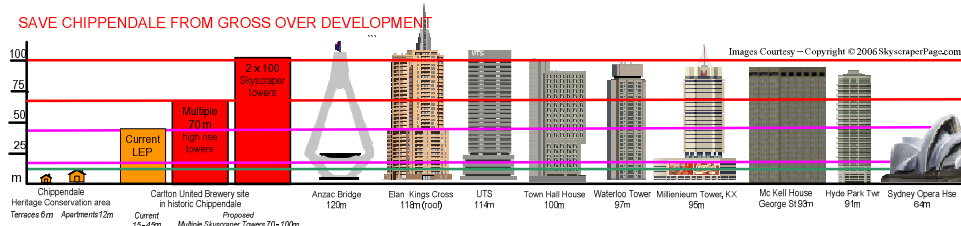
Without adequate open space, communities find it hard to function as “true” communities or adapt to changing needs.

The Study should take into account the overall development across the adjoining areas, including Chippendale, with appropriate benchmarking and follow international best practice, particularly given the amount of development proposed.

To ask our communities to consider and absorb such high density growth without a proper needs study being provided raises serious concerns. Our communities are being asked to absorb large scale high rise development; this includes multiple towers up to 33 storeys high on the CUB site and high rise towers up to 18 storeys for the new Redfern Town Centre with 12 storeys proposed for Eveleigh South precinct.

Can you imagine the outcry if low rise heritage terraces were part and parcel of the Pitt Street Mall's character with the latest Westfield development (which is 27 storeys high) proposed nearby?

We urge further investigations be undertaken and the draft Plan and draft SEPP be put back on exhibition for community comment before any assessment is made.





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FYI, we attach a copy from the Open Space Needs Study for the CUB site, which shows the shortfall in open space for Chippendale. Given the amount of development along the Chippendale - RWA corridor, we urge you to expedite a similar study so the open space forms part of any definitive controls and which can be considered by the community before any Plans are finalised.

7. Transport and Traffic Planning.

Similarly, the absence of a traffic and transport planning study seriously flaws a community review of the draft Plan. Even a small scale apartment block typically requires a traffic study so its impact can be considered.

Here we believe the RWA should commission a full traffic and transport needs analysis, with transport solutions that encourage a reduction in traffic, both locally and regionally, as well as reduction in pollution levels.

In addition, we urge the RWA to consider the introduction of a high volume pedestrian/cycle corridor from the ATP through The Block and Chippendale via Balfour Street and Jones Street in Ultimo, and onto the City and Glebe.

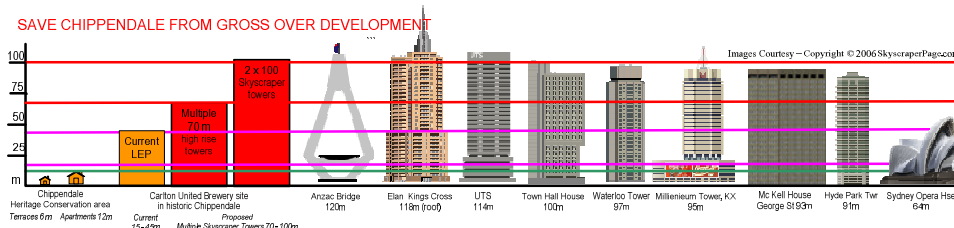
We appreciate these areas fall under various Authorities control, however urge the RWA to facilitate discussions with Government and the CoS, so that such a vision can not only be realised but become a reality.

Known as the GreenZone, it would be designed to remove large scale traffic from road corridors and actively promote a Government strategy that encourages and facilitates high volume pedestrian and cycle movement.

Given not only the impact from redevelopment in Redfern – Waterloo as well as the CUB site, we believe this is not only a credible but viable solution. We believe this approach would encourage an active people mix from all age groups and foster a long term residential vs. transient population as well as providing the opportunity for green space and a fresh approach on a human scale that links our communities.

We believe this solution is not reliant on the outcomes of a lengthy planning process but one that could be facilitated quickly and drive some real positive energy in terms of a rethink in the Government's transport strategy.

As part of the GreenZone, Redfern Station would be designated as the City's pedestrian – cyclist hub with large scale bike storage with local educational institutions and businesses promoting its use. This could also facilitate high volume east-west cycle movement from UNSW to University of Sydney.





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We have undertaken considerable research and welcome the opportunity to present this to you and the Government.

8. Developer Contributions from the redevelopment of the Carlton United Brewery site.

The Government has legislated for developer contributions to be taken from the development of the Carlton United Brewery site and used by the Redfern Waterloo Authority.

We believe it appropriate before the finalisation of any Plans for the Redfern-Waterloo area or changes to SEPP, that the RWA liaise with the CoS to assist in facilitating the exhibition of the Voluntary Planning agreement and proposed LEP for the Carlton United Brewery site.

This would allow the public to comment before the finalization of any Plans for Redfern - Waterloo; i.e. this would be part and parcel of the exhibition process for the draft BEP and SEPP, allowing the greater community to understand and consider the cumulative impact of what is proposed for the CUB site and Plans for Redfern-Waterloo.

9. Urban Design Review

The absence of an urban design strategy to retain local streetscapes, particularly heritage streetscapes and the relationship between new development and existing development is apparent within the Plan.

We urge the RWA to undertake such a study as part of any new controls, in order to set standards that ensure that local amenity, solar access and integration with the existing heritage streetscapes is preserved.

We await your feedback.

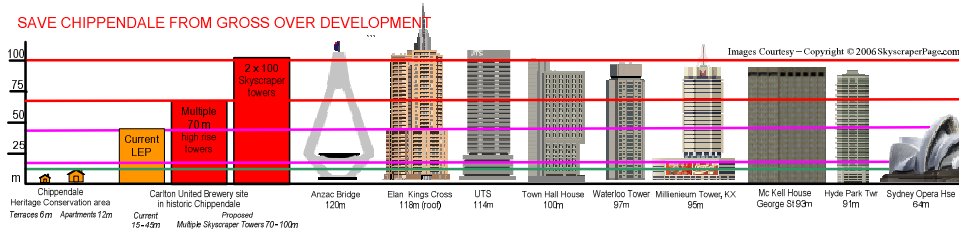
Yours sincerely

Michael Irving
 Chippendale Residents Interest Group

David Pocklington
 FoCUS

Jeanette Brokman
 East Chippendale Com. Group

cc: All Councillors, CoS





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Table 1: Existing Rate of Provision of Public Open Space in Chippendale based on 2001 Resident and Worker Populations

Residents	3,091
Workers	1,113
Total	4,204
Resident equivalent	3,314
Total public open space per resident	1.36m ²
Total public open space per resident equivalent (at 20%)	1.26m ²
Total regional open space per resident	29.07m ²
Total regional open space per resident equivalent (at 20%)	27.11m ²

Table 1 provides the rate of existing provision of public open space in Chippendale based on the suburb's resident and resident equivalent populations. The resident equivalent population considers usage by both residents and workers⁵. It is based on research undertaken by the former South Sydney City Council which identified that their public open spaces has a 20% usage rate by people working in the local area.

As outlined in Section 4.1, the extent of usage by other groups may increase this resident equivalent further particularly in areas where usage by other groups is large. For example workers are likely to use Wynyard Park just as much or even more than residents whereas a 100% resident equivalent may be appropriate.

Table 2: Comparative Assessment of Rate of Provision of Public Open Space

Geographic Area	Total open space per resident (m ²)	Total local/non regional open space per resident (m ²)
Chippendale	1.36	1.36
Surry Hills	6.17	6.17
Ultimo	8.80	8.80
Glebe	26.60	4.30
Green Square (levy required on new development)	N/A	6.0
Former South Sydney LGA (estimate)	12.0	6.0
City of Sydney LGA	34.80	6.60
Median for Sydney Region	85.03	29.52

Table 2 provides the rate of provision of public open space in Chippendale compared to other nearby areas. It highlights that provision of total open space and local open space is comparatively low.

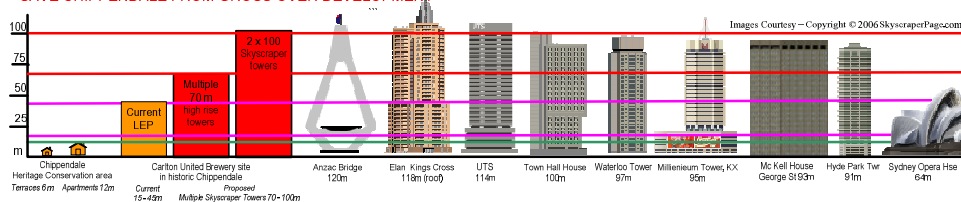
** this survey was undertaken by the NSW Department of Infrastructure, Planning and Natural Resources in 2003 and covered all the LGAs in the Sydney Region.*

Table 3: International Comparisons of Rate of Provision of Public Open Space

Geographic area/City	Total open space per resident (m ²)
Tokyo	6.1
New York	18.5
London	26.9
Philadelphia	28.3
Average for High Population Density American Cities	32.4
Los Angeles	33.0
City of Sydney LGA	34.8
Curitiba, Brazil *	51.5
Median for Sydney Region (2003)	85.0
City of Melbourne (2003)	87.0

Table 3 provides international comparisons open space provision. This total open space includes all regional and local open space including used by all levels of government and major private institutions such as universities.

SAVE CHIPPENDALE FROM GROSS OVER DEVELOPMENT

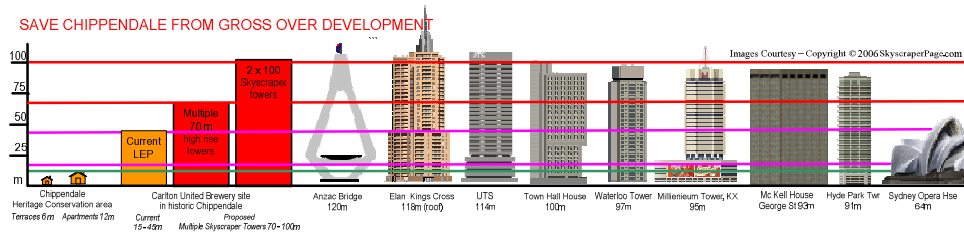




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Source: City of Sydney - Carlton United Brewery Site - Open Space & Community Needs Facilities Study 2004 - Heather Nesbitt Planning in Association with Bligh Voller Nield.



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