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Objecting to:

- **Draft Redfern Waterloo Built Environment Plan**
- **Draft SEPP (Major Projects) Amendment (Redfern-Waterloo)**

Lodged with:
CEO, Redfern-Waterloo Authority

Date:
18th April 2006

INTRODUCTION

I am lodging an objection to the Draft Redfern Waterloo Built Environment Plan (BEP) and the draft amendments to the State Environment Planning Policy (SEPP) in their current form. There are many inconsistencies, for no apparent reason, between the controls proposed for the area classified in the BEP as Eveleigh Street, predominantly owned by the Aboriginal Housing Company (AHC), and the areas surrounding it.

A strong inference can be drawn that there has been a different and unequal treatment of this area. There is also evidence of discrepancy between the stated intent of the BEP for the Eveleigh Street area and the planning controls.

My three main areas of concern are:

- proposed Land Use Zones
 - proposed Floor Space Ratios
 - proposed Height Restrictions
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1. PROPOSED LAND USED ZONES

The Eveleigh Street strategic site, which extends to Cleveland Street, has traditionally been a mixed use area with both housing and employment activity.¹

Creating a vibrant, safe and cohesive community within this site requires increased housing opportunities, employment and business and support services.²

Proposed land use zone
Business Zone - Mixed Use
Recreation Zone – Public Recreation³

- **Open Space – Inequitable Designation**

¹ Draft Redfern-Waterloo Built Environment Plan (Stage One), February 2006, p15

² Draft Redfern-Waterloo BEP, 2006, p30

³ Draft Redfern-Waterloo BEP, 2006, p31

- A large section of the Eveleigh Street area which is owned by the AHC has been zoned as *Recreation Zone – Public Recreation*. This will prevent the building of any future permanent structures, thus seriously reducing the area's capacity to create new housing, business, commercial and employment opportunities.

- There seems no valid reason for this designated open space when normal development controls provide for landscaped area as part of any design.

- **Residential Zone – Changes without Valid Reason**

The area known as Eveleigh Street is currently zoned *Residential Zone* in the existing South Sydney Local Environmental Plan, and no valid reason given in the BEP for this zone's elimination. This proposed change contrasts with the BEP's call for increased housing because it severely diminishes the opportunity to provide housing for the area's current and future residents.

- **Business Zone – Discrepancies within Identically Named Zones**

Both Eveleigh Street and the area adjacent, named *North Eveleigh*, are classified as *Business Zone – Mixed Use* but the latter has a maximum building height of 10 storeys and a maximum FSR of 2:1, whilst Eveleigh Street has a maximum building height of 5 storeys and a maximum FSR of 1.5:1. There is no reason given for such a discrepancy in identical zones and this will impact on the area's ability attract viable commercial and business interests.

2. PROPOSED FLOOR SPACE RATIO

- **Floor Space Ratio**

The proposed residential FSR for the Eveleigh Street area is clearly smaller than the residential FSR for any of the surrounding areas.

Floor space controls for the southern part of the Eveleigh Street site have been increased from FSR of 1:1 to 1.5:1 to encourage employment growth. Residential floor space will be limited to a maximum FSR of 0.5:1. The maximum height on the site will be generally limited to 3 storeys to ensure compatibility with the surrounding character and sensitivity to the site's orientation.

The proposed mixed use land use zoning for the majority of the site provides opportunities for the establishment of a greater range of activities, including non residential uses.

Activities on the northern part of the Eveleigh Street site are predominantly non residential at present. The proposed mixed use zoning is consistent with the existing land use zoning. Lot sizes, existing character, proximity to the Redfern Railway Station and Cleveland Street and the site's orientation offer the opportunity to encourage a greater proportion of employment generating uses which is reflected in higher proposed floor space ratio and height.⁴

⁴ Draft Redfern-Waterloo BEP, 2006, p22

The site named *Former Rachel Forster Hospital* is the only other site to have a restriction placed on its residential FSR and, at 1.5:1, this is three times that allowable on the Eveleigh Street site. The FSR's for the sites names *ATP*, *North Eveleigh* and *South Eveleigh* have "no limit for residential"⁵. This discrepancy is unexplained and places unreasonable limitations on the provision of housing for current and future residents.

- **Multi-unit Housing**

- **6 Business Zone—Mixed Use**

- (2) The following development may be carried out on land within the Business Zone—Mixed Uses:

- (a) Development for the purposes of any of the following:

- ... multi-unit housing; ...⁶

Multi-unit housing is listed under the definition of *Business Zone—Mixed Use*, but the proposed residential FSR of 0.5:1 does not allow for more than one residence on each title block as they currently exist. For example, for a site with area 100sqm, the permitted floor space is 50sqm: multi-unit construction is not feasible in such a small area. As a consequence of the FSR, what is allowable under the regulations is not, in fact, possible.

- **Culturally Appropriate Housing**

- Facilitate the development of quality housing for existing and new residents that:

- provides culturally appropriate and sustainable housing for Aboriginal residents⁷

Aboriginal families in the Redfern area are traditionally multi-generational and are therefore not suited to a small residence. The BEP recommends 'culturally appropriate' housing for Aboriginal residents but the proposed FSR's restrict the size of each house, and thus impact negatively on the ability of housing to provide for extended families.

3. PROPOSED BUILDING HEIGHT

- **Height Controls**

There is an inconsistency between the maximum building height controls for the Eveleigh Street area in the Redfern-Waterloo BEP and the draft SEPP: the BEP lists the maximum height for north section as 4 to 5 storeys, and the Southern Portion as 3 to 5 storeys whilst the draft SEPP lists the maximum height as 3 or 4 storeys for specific areas. This inconsistency creates confusion for designers and planners.

- **Design Concept**

- Design concept*

⁵ Draft Redfern-Waterloo BEP, 2006, p23

⁶ Draft State Environmental Planning Policy (Major Projects) Amendment (Redfern-Waterloo) Policy 2006, p5

⁷ Draft Redfern-Waterloo BEP, 2006, p31

The design concept for the RWA strategic sites is to:

- create greatest density around Redfern Railway Station in terms of both built form and activity⁸

General urban design principles

The following design principles will guide future development on RWA strategic sites:

- ... Development around the Redfern Railway Station to emulate the southern Sydney CBD (as around Railway Square).⁹

The building height restrictions on the Eveleigh Street site are more restrictive than many of the surrounding sites, for no apparent reason. The 3-5 storey limit on the Eveleigh Street site is inconsistent with the desire to create a CBD-like development in the area directly adjacent to the Redfern Railway station, whilst the areas on Gibbons and Regents Streets have an 18 storey height limit and a 7:1 FSR which is more in-keeping with high density style of development. The necessity for the Eveleigh Street site to have such low rise buildings whilst the buildings on the other side of the rail lines are allowed high density building is not explained effectively. The opportunity for more profitable high-density commercial buildings should not be denied the Eveleigh Street area.

- **Noise and Pollution Buffer**

General urban design principles

The following design principles will guide future development on RWA strategic sites:

- Ensure that new development is designed and located to minimise acoustic impacts from the railway corridor and traffic on major roads.¹⁰

As recognised in the BEP plan buildings taller than 3 storeys can create an effective noise and pollution buffer zone. The present height restrictions for the Eveleigh Street site contradict the intent of this plan.

- **The Block**

providing a three storey height limit along Louis Street, Caroline Street, the western side of Eveleigh Street and southern side of Vine Street in response to the scale of the adjacent terrace houses¹¹

Within the Eveleigh Street area, the piece of land known as 'The Block' is singled out in the Redfern-Waterloo BEP to have a maximum building height of 3 storeys. The BEP states this is a response to the surrounding built form. These adjacent areas, however, are permitted to increase their height limit to 4 or 5 storeys under the BEP. The need to retain the 3 storey limit, then, appears redundant in this instance.

⁸ Draft Redfern-Waterloo BEP, 2006, p16

⁹ Draft Redfern-Waterloo BEP, 2006, p16

¹⁰ Draft Redfern-Waterloo BEP, 2006, p17

¹¹ Draft Redfern-Waterloo BEP, 2006, p31

CONCLUSION

In conclusion, the discrepancies between the development controls and the stated intent should be amended to ensure that the control over open space, types of residence and land use, allowable FSR and height restriction be no different for the area known as Eveleigh Street than for all other areas within the scope of the Redfern-Waterloo Authority. With these changes this plan can be seen to be fair and equitable.

Within these parameters the owners, developers and designers can then meet the responsibility to provide the particular needs of the residents of the area such as business opportunities, community areas and culturally sensitive housing.