

SUBMISSION – DRAFT REDFERN WATERLOO BUILT ENVIRONMENT PLAN – STAGE 1

This is not a Plan, it is an identification of sites available for development or change, and the imposition onto those sites of the maximum possible envelope for development that the land owner can dream up, irrespective of all the proper planning considerations, heritage, urban design, ESD, the amenity fundamentals of solar access, light, ventilation, including view sharing. It is a reductionist approach, proper planning is a holistic or integrated evaluation of all of the issues pertaining to a site and its context to arrive at compatible and balanced controls for development.

It is insulting to the community to consult prematurely and invite a huge wave of dissent by serving up such a poorly considered ambit claim.

A private landowner would not do this, could not get away with this, they have to work within the established rules, they may try it on, but the gap is usually narrow, and the more sophisticated developers do not try it on, but work closely with the community, in evolving a Plan.

Equity and fundamental planning principles require that these sites if surplus to public needs, should have controls consistent with their context. The planning rules should be a level playing field, including acceptance of the normal levies and standards for public services, the on site provision of open space where appropriate etc.

Consultation during the plan preparation process using workshops and focus groups would be commendable, provided that it is understood that this is a plan in preparation.

KEY PRINCIPLE

Sydney's character as a city is derived from its geography as highly dissected plateau and drowned landscape with an intricate interplay of land and water, ridges and valleys. This understanding comes from Lindsay Robertson's analysis of Sydney's built character in the 1970's often reflected in Chris Johnson's commentaries. The derived planning controls, particularly to the Harbour edge since the 1970's reflect this, and remain, although the memory in the short attention span of current planning of the origins is dim.

Hence buildings and their controls should ensure that buildings echo topography and contour, and step up to amplify contour, and hence visually dramatise Sydney's incomparable urban landscape qualities, rather than diminish them. This understanding underpins the general loathing for Blues Point Tower, perhaps an OK building in the wrong place, on a Harbour headland that requires a low and broken form.

This key form-making principle is not just about scenery, essential as scenery is to Sydney's economic and social health, it is also about sharing the amenity, light, sun, all important sea breezes (in Redfern off Botany Bay), as well as the long views. If buildings step with contour, a maximum sharing can occur, not giving to some at the

expense of the many. While this is understood to the Harbour and the coastline, it can be all too easily eroded for the 'less salubrious' former industrial valleys, and flatlands of southern Sydney. But vast numbers of people enjoy these long vistas from both public streets and from buildings on the rising land to the edges. Newtown ridge provided prime sites for Colonial villas sited to view to Botany Bay and the Eastern Suburbs ridge; views now enjoyed by many more people. For example the wonderful vista down Forbes Street Newtown will be slam dunked into a ten storey building. Likewise the view from our veranda on the corner of Queen & Wilson currently to the Eastern Suburbs ridge will be wiped. Conversely the public prospect of our landmark building from across North Eveleigh will go.

The assumption in the Plan that a thin edge of lower buildings purported to be compatible with the existing fabric can then allow for much higher buildings behind is fundamentally flawed – particularly for any buildings in the valleys.

It would be wrong to assume the central City violates this principle; the central city is the most dramatic example of it, following as it does a long north/south ridge. This of course peters out at Redfern and may be a rationale for some step up in height and density, if Redfern was integral to the City. But it is not, it is currently about 1km from Central Station, which is the current southern extremity. If growth of the central spine can be justified, then building a new urban precinct across the railway yards south of Central is the obvious way to go, not to pretend that Redfern is a natural extension, in order to violate its own particular flavour.

Fallacy – linked to this key principle and a fallacious assumption underpinning this Plan is the notion that height and density are linked – they are not. Some of the densest places on earth are low rise, including both European and Asian examples. High rise cities, are not necessarily dense. Increasing height also requires increasing separation for light/sun/ventilation/common space/roads etc Height in Sydney is often a rationalisation for capturing views at everyone else's expense, as with the Horizon Tower hovering over low-rise Darlinghurst.

THE PLANNING FRAMEWORK

The sites now up for development or change (that is not in dispute – there is scope for change) are all embedded in densely built up inner suburbs, primarily nineteenth century fabric. As these are precious, rare, highly valued, and valuable assets, virtually the whole area is in Conservation Areas. This means almost everything in these areas is contributory to the heritage and these values should be conserved. This also means any new inserts be compatible – largely meaning compatible in scale and character with these places. The current controls reflect this intent, of protecting and enhancing these places, not changing them to something else.

Consequently the dominant zoning is Residential – Medium Density with a net FSR limit of 1:1, wall height limits of 6m (with a further 3m for rooms within a roof form). These are the controls applicable to most of the areas identified for change, including North Eveleigh, the former Rachel Forster Hospital, the former Redfern Court House and Police Station, the former Redfern Public School, and the Eveleigh Street precinct. Any variations from the existing controls need to be justified in terms of protection of their scale and character, and shared amenity and ESD including

BASIX compliance. Some areas, being principally the commercial precinct abutting Redfern Station, and the Cleveland Street side of the Eveleigh Street precinct, have a bigger scale and higher density reflected in the controls for the Mixed Use zones with FSRs between 1.5:1 and 2:1 and wall heights of between 9 -12m. This is reflected in recent development which is between 3 – 5 stories, usually with top level cut back to reduce the effective bulk and impacts. This approach also makes them more compatible with the remaining Victorian commercial buildings, which are principally two storied.

Similar controls are applicable the ATP area, allowing for denser development than the norm, and somewhat higher building (not more than 5 stories), and hence a reasonable compatibility in scale and character with the context and conserving the shared amenity. Similar controls also apply to the large development zones such as Green Square and Victoria Park, but with bonusing for the provision of public services/infrastructure, but principally a generous new parklands and public domain. However the generous public domain in these development areas is a trade off for the much higher buildings than are compatible with the RWA. The ATP also has a generous public domain and open space which is not achievable with the blanket FSRs proposed.

NET & GROSS FSR

The major fudge in this Plan is the use of gross FSR's that make them more palatable set against the existing – they are still higher. The existing controls apply to net site areas taking out the roads, open space etc. In examples such as North Eveleigh where the very considerable site constraints, including heritage, heritage curtilages, open space, roads, and setbacks, from the abutting residential means that the net FSR is likely to be about double the gross figure – demonstrating the inappropriateness of what is proposed – way out of line. It is absurd in this tight fine grained context to propose heights and densities exceeding Green Square and Victoria Park, where there is evident scope for higher buildings in conjunction with a much more generous public infrastructure.

OPEN SPACE

Redfern has long been recognised as the most deficient inner suburb in terms of open space, about 5m²/capita. This compares with a norm of about 10m²/capita in most of the suburbs abutting the central City – and hence the standard adopted for open space in Pyrmont Ultimo. (We assume that Victoria Park and Green Square would have similar provision). It is not only essential that this low rate be sustained, but that the provision be improved where public land is available, to rectify the acknowledged deficiency. The City's levies and those of the adjoining Councils, reflect this aim. For example in the suburbs making up Leichhardt LGA, including its former suburb, Glebe, the open space provision is 22m²/capita.

It is difficult to see that lifting Redfern out of its alleged multiple deprivation and social malaise, will be achieved by a massive increase in the height and density, and no increase in the public infrastructure. The pretence that this Plan is somehow good for Redfern is breathtaking hypocrisy.

SITES - We now comment on some of the site specifics.

NORTH EVELEIGH – this is the third ‘Plan’ produced for this precinct. The second plan came closest to meeting the community/Council issues, but was still expecting too much, giving too little, and making inadequate commitments to the provision of infrastructure, including the north/south pedestrian cycle connection to the APT, as part of addressing the divide between two communities Darlington/Newtown and Alexandria. The Council’s evaluation of the second Master Plan provides the best starting point towards an acceptable plan for this precinct, not the current Plan.

Heritage – the whole is heritage, a complete railway history is represented here, central to the development of Australia, and the most complete such complex in the southern hemisphere. There is scope for conservation and adaptive re-use of the whole, a World Heritage Site nomination would be appropriate, with substantial cultural and economic spin-offs. Decisions to date have been encouraging, the sensitive adaptation for the ATP, and the arts complex in train. However substantial elements of agreed State significance are now proposed to be demolished. These include the Blacksmith’s shop along Wilson Street – unnecessary as it provides a reasonable envelope for adaptive re-use to a variety of work spaces. The east and west traverses are included in the development zones – even though these are required to understand the functioning of the complex, are rare heritage, and are also essential curtilage to the buildings. The paint store and abutting carriage sheds are also in the development zone, with floorspace and height controls that will ensure that they go. Their conservation is essential to the heritage. Being substantial buildings they also have potential for ongoing life. The timber store, also a fine building and component of the complex, was to remain for community use within a new park – now in jeopardy. The rail fan is also slated to be developed. A proper study of the curtilage constraints and the essentials for interpretation of the whole complex would establish a more realistic framework for development. This work has been done, it is just ignored with this Plan.

Urban Design – the whole site is a Heritage Item. The site abuts several Conservation Areas where the scale is principally two storied sometimes with attic storeys within the roof. The abutting part of Macdonaldtown is mostly single storey, and sits lower than this site. The Plan suggests four storeys to the edge is compatible with this, with ten storeys behind. Given the long vistas from all directions and rising land to the north, the full ten storeys will be visible. The argument for four storeys is that the site being lower than Wilson Street. But it is not two storeys lower, and any lower floors would have poor amenity unless setback. Setbacks are precluded by the access road and the workshop complex. Built-form needs to respect the topography and the scale of the railway buildings, and to be uniformly low and horizontal in character. They also have to be within existing ridge heights to sustain the prospect out from private properties and the cross streets. The last Master Plan at least played lip service to this requirement. The character of Wilson Street is it being low and open on the southern side – that character should be conserved. Applying the existing controls within the Conservation Areas to this site, would still give ample scope for development, and a much more liveable new precinct. The same rules should apply.

Open Space – the previous Master Plan provided a useful framework of open space with linkages through the site. Given the proposed high density this did not sustain the current provision rate, let alone address the deficiency. Newtown/Darlington is also very deficient. But, reducing the density would make for reasonable provision. The current Plan puts this and most of the key issues on hold.

Amenity/Environmental – respecting the existing scale also serves to protect the existing amenity in terms of light/sun/ventilation and view sharing, and providing a similar amenity and public infrastructure to the new users.

SOUTH EVELEIGH – the framework for the APT precinct is already well established, with a generous and attractive public domain. The scale and character is also well established referencing to the generally low scale of the existing complex and the medium density housing in the Mixed Use Zones on the Redfern side – generally three to five storeys, but with five being exceptional, and with the upper storey cut wall back to reduce the apparent bulk. The Plan violates this with buildings stepping up to twelve storeys, as if lower buildings to the edges make higher buildings behind acceptable. Breaking these norms will be discernible, and will destroy the cohesion of this precinct, and seriously compromise the heritage precinct. They will also compromise the shared amenity and the microclimate given the valley situation. They will also block substantial shared view lines, particularly north/south across the former yards. It is essential for all of these reasons to respect the existing scale. This is particularly questionable when the expected FSR for the site of 2:1 can be achieved within the existing scale. The higher FSR of 2.5:1 on part G is also questionable, as this site is very compromised by its configuration, its proximity to the railways, and poor accessibility.

EVELEIGH STREET PRECINCT – the Pemulwey Project of the Aboriginal Housing Corporation has evolved through a very long process of consultation with the community and is endorsed as the basis for development in this area. A step in scale towards Cleveland Street is reasonable given the prevailing scale and character, and the warehouse character of Chippendale to the north. Compatibility with the scale and character of the Conservation Area is still essential, conserving contributory heritage. The proposed controls provide a substantial incentive for comprehensive redevelopment. Comprehensive redevelopment has no place in a Conservation Area.

REDFERN RAILWAY STATION, GIBBONS & REGENT STREET – this part of central Redfern has a more urban quality than the remainder reflecting the commercial hub, reinforced by the Mix Use Zone and newer 4 – 5 storey apartment buildings. This is the maximum scale compatible with conservation of the historic core along Regent Street. Higher buildings are not compatible, and will seriously impact on the amenity of the many new apartment buildings in this area. It is not appropriate to appeal to the TNT towers to allow high rise buildings. The towers are an aberration from the era of slum clearance, when the inner suburbs were considered detritus from the past. The notion that Redfern is an outstation from the central City, is a nonsense.

The existing and long enjoyed open space and landscape curtilage to the Water Tower Building must be conserved as essential to needs of this very congested area.

It is ludicrous to propose a huge new residential precinct in central Redfern while taking away the very limited existing parkland.

RACHEL FORSTER HOSPITAL – given the anticipated burgeoning growth of Redfern taking away this opportunity for new services would seem questionable. If this can be justified, then as a heritage precinct – the whole is a Heritage Item, there is scope within the heritage constraints for adaptive re-use. Its development should be guided by a CMP rather than broad brush planning controls. Perhaps a mini – St Margaret's come to Redfern would keep the character with careful interventions. The scope for additional floorspace would be minimal within the heritage and amenity constraints keeping reasonable shared common space and landscaping. The existing mature gardens are important to the values, and could be part of a memorial interpretive response to the history of the Hospital, as with the former Camperdown Childrens' Hospital. .

REDFERN COURT HOUSE & POLICE STATION – the whole is a Heritage Item of great significance, State significance – a CMP is requisite before making decisions on the future of this site. This Plan is premature. The site is very constrained by the single storey Court House over about half the site – with curtilage constraints, and the two storey former Police Station also a fine early twentieth century building. Adequate conservation of the two buildings with an appropriate setting as well as the severe constraints on access to the site suggests very limited scope for additional development. The proposed controls are totally unrealistic, given the constraints. The existing building height on Turner Street should remain to respect light and sun and an appropriate scale to the early and rare single storey houses on the south side of Turner.

FORMER REDFERN PUBLIC SCHOOL If surplus to requirements for social infrastructure, there is scope for development compatible with the prevailing scale in the Conservation Area. The area is primarily two storied with some modern three storied development. The School is a Heritage Item of State significance. The development of this site therefore needs to be guided by a CMP rather than conventional planning controls. The proposed heights are not compatible with the character of the Conservation Area or with the School buildings. It is not appropriate to appeal to the huge jump in scale of the public housing towers across Phillip Street. A clearly defined edge between the two scales is appropriate.

CONCLUSION

This Plan should be deferred for all of the studies to be completed and integrated into the sort of plan the City would have prepared, if its powers had not been withdrawn.

Bruce & Sarah Lay