



## Council of Social Service of New South Wales

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Mr Robert Domm  
CEO  
Redfern Waterloo Authority  
PO Box 3392  
Redfern NSW 2016

Dear Robert

I am writing in relation to the draft Redfern Waterloo Built environment Plan (Stage 1) and the invitation for interested organizations to provide comments.

As you are aware, NCOSS supports the development of a sustainable vision, development objectives and actions for the renewal of Redfern Waterloo and welcomes the release of plans for the Built Environment, Human Services and Employment and Enterprise within short periods of each other, although this makes it difficult to comment on each in isolation.

The draft Built Environment plan needs also to be considered in conjunction with the draft SEPP (that is designed to form part of the Major Projects SEPP already in force), which outlines zoning, building height and floor space ratio provisions. NCOSS notes that the draft SEPP gives the Minister<sup>1</sup> the power to exceed the height and floor space ratio restrictions if there is an approved concept (master) plan in place for a particular site.

While NCOSS understands the importance of the 8 strategic sites, we would have thought that it was generally preferable to do a Built Environment Plan for the entire area covered by the Authority to see if existing zoning restrictions remain relevant.

Based on the comments on p.69 of the draft Plan, it seems there is to a separate planning exercise undertaken to look at revitalizing the major public housing sites in Redfern Waterloo. The suggestion seems to be that there will be some dispersal of stock outside Redfern Waterloo. (the commitment quoted on p.69 does not say there will be no reduction in the amount of public housing in Redfern Waterloo).

NCOSS needs to see who is to be the lead agency for that, how it will engage with tenants and the broader community and community sector, and how the renewal/community regeneration plan will eventually fit in with the Built Environment Plan.

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<sup>1</sup> NCOSS understands that in this context 'the Minister' means the Minister for Planning, not the Minister for Redfern Waterloo. At present they are one and the same.

### Metro Strategy implications

Redfern Waterloo is part of the Sydney Airport to CBD corridor, which is part of the broader global arc (now called Sydney's Economic Corridor).

Under the proposed Built Environment Plan, Redfern Waterloo will provide about 1/3 of the City of Sydney's employment targets under the Metro Strategy, but only a minor element of its housing growth. This is presumably because there is no shortage of general housing activity (not affordable housing) elsewhere in the City of Sydney.

Significant changes at 4 of the sites:

- up to 18 storeys for the Station/Gibbons/Regent St site,
- up to 11 or 12 storeys for the undeveloped parts of the ATP and adjoining South Eveleigh sites;
- up to 10 storeys (and one building up to 16 storeys) on the North Eveleigh sites.

The draft Plan indicates a total capacity 440,000 m<sup>2</sup> of employment space or 18,000 jobs.

There is no discussion in the draft Plan as to where this would place Redfern in the future centres hierarchy of Sydney. Preliminary research suggests it would position Redfern as Sydney's 5<sup>th</sup> largest commercial space, behind the CBD, North Sydney, Parramatta and North Ryde/Macquarie Park.

If this is correct this would put Redfern ahead of Chatswood, and the designated suburban growth centres of Penrith and Liverpool (please see attachment)

The social and environmental impacts of the scale of this subregional centres type development need to be firmly stated and an action plan for their monitoring should be inserted in the draft Plan

### Other issues

NCOSS understands that an affordable housing strategy for the area is still to come. The RWA suggests that this is to be largely financed by the Carlton and United Brewery site and the 8 RWA strategic sites. NCOSS believes there must be a NSW government, as well as developer contribution to The Redfern Waterloo Affordable Housing Strategy this, as per the Ultimo Pyrmont experience.

Obviously the future development of the Block issue needs to be resolved. There is no Plan when the Minister's position is opposed by the landowner, and the landowner's Plans are opposed by the Government and may not have a financial backer.

In addition, a proper town centre is needed for Redfern. The best location for this is open to debate. The plan makes only passing reference to the existing shopping centre (east of Regent St) or of opportunities to redevelop it. It notes that existing residents largely go elsewhere to shop (to Broadway, Surry Hills, Marrickville or Eastgardens).

It appears to NCOSS that the Station/Gibbons/Regent St site is more earmarked for office rather than shopping. There is thus possible confusion about differing meanings of a town centre, which is a critical matter that must be resolved in partnership with the various elements of the local community.

NCOSS suggests that in the final development of the Built Environment Plan (Stage 1), specific links in relations to the various sites are made between it and the Employment and Enterprise Plan. In addition, the means to effectively assess the social and environmental impacts of the scale of redevelopment proposed should be included in the final Built Environment Plan with cross reference to the role that actions from the Human Services Plan will play in helping to address these impacts.

I hope that these comments will be carefully considered by the RWA and the Minister in the finalization of this Plan

Yours sincerely

Gary Moore  
Director

## **Attachment**

### Hierarchy of business centres in Sydney

There is no agreed data source on this but the Property Council has conducted a number of joint studies, especially with Parramatta and North Sydney Councils. Based on the findings of the North Sydney study<sup>2</sup>, the current hierarchy for offices and shops respectively appears to be as follows:

#### *Office space*

1. Sydney CBD
2. North Sydney
3. Parramatta
4. North Ryde/Macquarie Park
5. Chatswood

#### *Retail space*

1. Sydney CBD
2. Parramatta
3. Chatswood
4. North Ryde/Macquarie Park

There is substantial development underway at Rhodes, and Macquarie Park (both office space and retail) is to expand in conjunction with the completion of the Epping to Chatswood railway.

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<sup>2</sup> *North Sydney Demand Study*, Urbis JHD for North Sydney Council and the Property Council of Australia, November 2004.