



Submission on

Redfern Waterloo Authority Draft Redfern-Waterloo
Built Environment Plan (Stage One) (BEP)
and
State Environmental Planning Policy (Major Projects)
Amendment (Redfern-Waterloo) Policy 2006 (SEPP)

to
Director General of the NSW Department of Planning
and
CEO of the Redfern Waterloo Authority

on behalf of
REDWatch

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Key Recommendation on BEP and SEPP

The RWA has elected to release both the Draft BEP and SEPP for concurrent comment. This is the first chance the community has had to see the RWA's plans and to comment on them. REDWatch advised the RWA in a submission in May 2005 that it was of the view that the Redfern Waterloo Plan, of which the BEP is a part, should be developed in consultation with the community. However the RWA not only chose to develop the BEP without community consultation, but also decided to release the SEPP (which legally implements the BEP) prior to the BEP having been on display.

REDWatch is strongly of the view that the SEPP should not have been presented until there had been adequate community consultation on the BEP and the resultant changes identified and incorporated.

Significant differences between the Draft BEP and SEPP concurrently on display, which are in areas of major concern to the community, should cause the SEPP to be withdrawn and redrafted irrespective of the level of support for the BEP. Community responses on Marian Park and North Eveleigh in particular are likely to have been impacted most by the differences between the BEP (used by most people for their comments) and the SEPP which showed zonings in these areas differently to the BEP. Some of these differences are documented later in "REDWatch Concerns on Specific RWA Strategic Sites".

These however, are not the only problems of major significance in the BEP and therefore until there is agreement about the adequacy of the BEP there is no adequate basis for producing the SEPP. With many submissions arguing the BEP should not proceed until further information and associated plans are made available the SEPP should not be allowed to proceed at this time.

RECOMMENDATION 1: That the SEPP as exhibited should be withdrawn.

The lack of detail presented to the community in the BEP on a range of areas necessary to make an informed response to the BEP leads REDWatch to the conclusion that the BEP, as it has been exhibited, is not adequate for the community to be able to form considered views on the BEP or the SEPP.

The RWA should proceed with the range of necessary additional studies and draft policies to provide the community with the missing details on how the BEP will operate. These details should include an indication of what will happen with Redfern Station, Traffic and Transport, Public Domain and Open Space, Heritage and Urban Design. In general terms REDWatch supports the City of Sydney's executive summary recommendation on the areas where further work needs to be undertaken to ensure the community has all the necessary information available for it to make a considered response on the BEP. Many of these studies were not listed by the RWA as Future Key Tasks in section 5 of the BEP.

REDWatch requests the RWA to clearly state upfront if the future redevelopment of the public housing estates in Redfern and Waterloo is part of the RWA's longer term plan for the area. This is crucial to determining whether and/or how the promises of housing mix, and specific retention of accommodation in the area for current residents, are to be delivered. It is also crucial that any such development(s) occur in conjunction or concurrently with any other residential development(s) so issues of transient accommodation etcetera in the area during site construction can be readily addressed.

REDWatch notes that while promised for review in the coming year, affordable housing studies/policies have not been made available to the community. These also need to be considered in conjunction with the above programs to ensure an appropriate mix and spread of properties is delivered through implementation of the plan. It is crucial that the affordable housing options include housing options for those who need to move from public housing as a result of their improved circumstances and not just for those who move into the area to take up lower paid employment opportunities. An affordable housing plan is not just a contributions plan;

it is a plan to provide the spread of housing options needed by the community however they may be planned to be paid for.

The RWA has argued during the exhibition stage that it is possible to approve the Draft BEP and the SEPP without having the details of the other planning aspects for the state significant sites. REDWatch rejects this argument since the developments proposed by the RWA are not infill developments where one would expect existing planning controls to be known and to govern the re-development.

The RWA BEP does not aim to develop surplus government land as an infill in line with the scale and character of the existing area and built form. Building heights are not being contoured to the topography with a view to maintaining sight lines or the existing residential and mixed character of the existing area.

Under its Act the RWA has "to promote the orderly development of Redfern–Waterloo taking into consideration principles of social, economic, ecological and other sustainable development".

What the RWA proposes is development which is significantly out of character with the surrounding built environment and which is designed to push the development envelope and transform the areas over which it has control in line with the NSW Government's broader Metropolitan Strategy. Its first two aims as stated in the SEPP are "*(a) to provide for the redevelopment of the Redfern-Waterloo area in a manner consistent with the principles in the Sydney Metropolitan Strategy, and (b) to increase building density around Redfern Railway Station and to provide for a diversity of land uses in the area*".

This is such a major departure from the existing local control plans that it is necessary for the community to have a range of additional information regarding the content of the RWA's new control plans for it to be able to understand what is proposed, to assess its impact and to make informed submissions. Such a departure also implies that significant effort should be made to ensure that the RWA BEP, the SEPP and other planning instruments adequately mesh with City of Sydney plans, especially with the unparalleled opportunity presented by Council currently reviewing its local Planning Controls for this area.

For an example of the difficulty facing residents, consider how it is possible to respond to the proposed North Eveleigh Zonings. They are in different locations on the BEP and SEPP as far as sight lines are concerned. Without further information on traffic impacts, open space and heritage it is impossible to estimate the adequacy or otherwise of the gross FSRs proposed when you do not know what the RWA is planning for major heritage items such as the Blacksmith Shop, Paint Shop, Carriage Works and Railway Fan. These are not zoned at existing height. Given all these unknowns, how is it possible to make a considered response on this and other sites?

During exhibition the RWA has been quoted as saying that the BEP plan, after any revision, will not come back for further exhibition or community consultation. REDWatch finds this totally unacceptable, especially given the significant problems in the BEP and the lack of information necessary for the community to make informed comment on many of its aspects.

The BEP information is so sparse in crucial areas that it is impossible to make considered responses and hence we must recommend:

RECOMMENDATION 2: That the RWA rework the BEP in the light of submissions received and that additional plans, which are at present omitted, be prepared over the next six months with a view to bringing back to the community a comprehensive plan for consultation before the end of 2006. The omissions that need to be included in the revised Plan should include details for Redfern Station, traffic and transport impacts, a Heritage and Conservation Plan, an Open Space Plan and such other additional plans necessary for the community to properly understand what the RWA is proposing so they are able to constructively comment on the proposed Plan.

RECOMMENDATION 3: Prior to a further community consultation, the RWA should discuss the revised BEP and associated control plans with City of Sydney planning staff with a view to presenting a BEP to the community which meshes, as much as is possible, with the Council's planning framework for the area surrounding the RWA's state significant sites.

RECOMMENDATION 4: That the SEPP should not be redrafted or re-exhibited until after further consultation on the BEP later in 2006. The SEPP should bring into planning law the outcome of the BEP consultations and for this reason must not be done concurrently but as the last stage in the planning / exhibition process for the Stage One sites.

In the balance of this submission REDWatch will provide some comments on our major areas of concern on the BEP & SEPP as well as our concerns on specific RWA strategic sites. We believe these matters need to be taken into account in a major rework of the BEP before it comes back for further community consultation.

REDWatch Major Areas of Concern on the BEP & SEPP

1 A Lack of Vision

The RWA's BEP makes reference to a vision for the area but it does not articulate a vision. The BEP states that the Redfern Waterloo Plan (RWP) will comprise three major components – the Built Environment Plan, Human Services Plan and the Employment and Enterprise Plan but again no vision. The first item on the list of items that the Redfern Waterloo Plan may make provision for in its act is “(a) the strategic vision for the sustainable improvement of the area”. It is missing.

Without a vision we have three plans but no purpose, nowhere to aim for and no way of seeing if we progress has been made. REDWatch believes the establishment of a Vision for the Redfern Waterloo Plan is a glaring omission and a Vision needs to be developed with the community.

A vision is required to ensure an effective meshing of both the RWA plans with each other and the meshing of the RWA Plans with the City of Sydney to ensure realistic and liveable outcomes.

2 A Lack of Integration

Three separate plans and a vision are not sufficient. They need to be fully integrated and implemented. At the present moment they are disjoint. Even the individual Objects of the RWA Act, which must be reflected in the RWP, do not neatly fit into just one of the three planning areas chosen by the RWA – they require integration of the three RWA Plans.

As a reminder the objects are:

- (a) to encourage the development of Redfern–Waterloo into an active, vibrant and sustainable community, and*
- (b) to promote, support and respect the Aboriginal community in Redfern–Waterloo having regard to the importance of the area to the Aboriginal people, and*
- (c) to promote the orderly development of Redfern–Waterloo taking into consideration principles of social, economic, ecological and other sustainable development, and*
- (d) to enable the establishment of public areas in Redfern–Waterloo, and*
- (e) to promote greater social cohesion and community safety in Redfern–Waterloo.*

While the BEP deals with that small part of Redfern-Waterloo that is state significant, the RWA has wider responsibilities under its Act which need to be remembered. While in the wider RWA area the RWA does not have responsibility for the built environment it does have responsibility not just for human services and employment plans but for these broader areas spelt out in the RWA Act.

Further, given that the City Council is presently reviewing its City Plan for this area, this provides an obvious opportunity to ensure that the City's plan and the RWA's plans mesh to provide a logical and coherent vision for this area.

3 Open Space

REDWatch is concerned that the BEP seeks to remove precious open space from the community, without making any reference to this fact in the documentation. No open space should be removed without an equivalent space being made available in the same area. REDWatch is opposed to the proposed removal of Marian Park and its replacement with buildings up to 18 storeys. This area has operated as a park for a considerable period of time and is counted in the City of Sydney's open space calculations. It should remain a park.

The RWA expects residential development to be included in the commercial core and the BEP and the SEPP have put no caps on the residential FSR allowable in developments in this core. The RWA has not released projected figures for the number of residents it expects to reside in this area. Nevertheless the RWA has a planning obligation to provide open space for these

residents. No new open space has been proposed for the commercial core and the removal of Marian Park will further exacerbate the existing shortage of open space for commercial core residents and workers.

Also in the commercial core we note that the Civic Space is not protected by the SEPP. We would urge the RWA and Department of Planning to appropriately zone this area to guarantee it is designated public space. Currently the existence of the area rests on public space being only one of the possible legitimate uses of this area within the commercial core zoning.

REDWatch is also concerned that the open grassed playing space at the former Redfern Public School was not zoned as public recreation and preserved as green space. The zoning over this area with 4 and 7 storey allowances does not preserve this area and is contrary to what we understand to be in the heads of agreement with the ILC for the purchase of the former school site. The SEPP and BEP should be altered to include the open space as public recreation so that its current public usage can continue.

REDWatch is further concerned that there is no new area designated as open space or public recreation within North Eveleigh. Such spaces should be covered in the BEP and the SEPP to ensure that new usable public open space is guaranteed in the development rather than such space being only defined in terms of small incidental spaces around developments resulting from a height / FSR trade off.

The lack of any figure for the amount of public space per head that the RWA plans to introduce to ensure new residents within its developments are provided with adequate usable public space is also a major omission. Given the already low per capita allowance of public space area, in the RWA's area, REDWatch is of the view that the RWA needs to implement the standard in the EPA Act of 28.3 square metres per person for the total proposed residential population coming into the area as a result of the re-development of government lands. On the basis of the RWA's estimates of an increase of 4,000 residents the RWA should zone 113,200 square metres of open space for use by residents in the areas covered by Stage One of the BEP.

Under the RED Strategy there was a proposal to substitute creation of local public space with links to regional public spaces adjacent to the RWA area. While such links can be important as part of the improved local connectedness, it is crucial that there be adequate local open space within the RWA's boundaries that is easily accessible to children and others in the local community. Such spaces, if they are safe, can be important meeting places and assist build community linkages.

While we welcome a provision for open space on the Block we note that the area designated includes land owned by the Aboriginal Housing Company that had housing removed from it in the lead up to redevelopment of the Block. Any rezoned open space declared on AHC owned land must only occur after consultation with the AHC. Due compensation to the AHC for this land should include provision for any loss of FSR resulting from the zoning, which should be able to be used elsewhere on their site within the proposed AHC redevelopment of the area.

Ensuring adequate provision for public domain and open space is crucial in any plan of this nature; this especially so when a brown field site is being developed and it is possible to address the shortage of open space within the immediate area. The public domain plan should also incorporate provisions for street and other public art.

The BEP and SEPP should come back to the community for further consultation with the above changes and proposals for how public domain and adequate open space requirements will be met by the RWA in accordance with Object (d) of the RWA Act under which they are "to enable the establishment of public areas in Redfern–Waterloo".

4 Traffic and Transport

There are a myriad of traffic and transport issues which have not been addressed in the plan and which need to be outlined so that the community can make an informed decision about the adequacy of the RWA's BEP.

The BEP must create a functioning commercial core and transport hub otherwise the results proposed will not eventuate.

The impacts of through traffic corridors on Redfern Waterloo, and the rat runs they also create, are major issues which need to be addressed by the RWA. These corridors are controlled by NSW Government instrumentalities and the mitigation of these impacts on Redfern Waterloo must be part of the RWA's activities in the area as the body responsible for co-ordinating government services and activities to deliver the results sought by the RWA legislation and the Metro strategy.

REDWatch is of the view that that the RWA cannot leave the impact of Gibbons and Regent Streets on the commercial core to be resolved by "a more strategic response which takes into consideration broader metropolitan and regional traffic issues and may not be imminent".

The success of any commercial core is dependent on the ability of people to access it and for it not to be built on an impermeable island between two major arterial roads. The same rules apply for people being able to access the railway station or Redfern Street who also have to cross these arterial roads. The RWA must find a solution to this problem before proceeding with the commercial core proposal.

The draft BEP makes no provision for a transport interchange which is essential to address the current interchange arrangements that see people having to cross two busy roads, often unsafely, to move between bus and train. Many local people do not use the Redfern Station area because it does not allow easy access for the less mobile members of the community to negotiate Gibbons, Regent and Lawson Streets as well as gain access to the railway station and its platforms.

Much of the BEP revolves around the upgrade of Redfern railway station; however details of what is planned will not be available until later in 2006. Until a plan for the railway station is released it is not possible to assess what is proposed around it. It is crucial that the plan either not be finalised until the station proposal is public, or if this does not happen, that the BEP and SEPP can be amended when the details of the Redfern Station development is known.

To have the 8th busiest railway station in the network without disabled access is totally unacceptable. As a short term solution until the full upgrade, the inclusion of a lift to one platform to give access to Central Station should be considered as a matter of urgency.

REDWatch is of the view that the RWA should make provision for three pedestrian and bike crossing points across the railway line between North and South Eveleigh rather than the one pedestrian and bike crossing point at the eastern end of North Eveleigh and the indeterminate motor vehicle tunnel in the middle. The middle connection could link the Arts centre with ATP by a pedestrian and bicycle bridge and an additional crossing should be considered between the park near Explorer Street and Holdsworth Street or near Iverys Lane. This would dramatically improve north south connections across the railway line and encourage bike and pedestrian traffic. Careful consideration will need to be given to community safety aspects of these crossings to ensure that the areas created do not put those that use the connections at risk of antisocial and criminal behaviour.

In addition, the RWA should be working with City of Sydney to develop a regional bike network to enable integrated travel between the future evolving business hubs in this area, and the residential & dormitory areas surrounding them. It is of concern that traffic counts being currently undertaken in Wilson Street, which is a major bike artery; do not appear to be counting bike traffic.

Local residents find accessing buses in peak hour a major problem as buses are often full before they get to Redfern Waterloo at peak times and waiting times are excessive. Improvements in public transport access are hence very important for the RWA to consider before they increase the number of people living and working in the area. Reference has been made to Redfern potentially providing employment for people living in Green Square. Currently bus is the only

public transport connections between these points and there are major access issues that the RWA will need to ensure are addressed.

The community has on a number of occasions highlighted the need for a local transport network or CAT to allow people to access the local stations and the area's services. This is crucial due to the large proportion of non-car owners in the area, in particular in Waterloo which is also badly serviced by regional bus routes. Transport to basic services such as schools, hospitals, shops, open space and to transport nodes is basically impossible for those with an infirmity and not much better for the remainder of the non-car owning population. Transport strategies have to address these needs.

There is no point in the BEP highlighting the proximity of large recreational parks and regional services when there are no transport options other than car to access them. If the RWA is going to discourage car use in the area for new residents and new workers, it has to also ensure that local transport alternatives exist that allow people to do their everyday activities without using a car. This is also the case for those in the substantial new residential populations in Green Square and Victoria Park, as well as those proposed by the BEP. A solution to this problem should be possible due to the density of the area and any cost on government should be weighed against the improved amenity and lessening of motor vehicle use in the inner city.

Finally the RWA BEP plans for an extra 18,000 workers and 4,000 residents in the area as a result of Stage One. This will result in an increase in traffic in the area during both the construction and subsequently as the developments are populated. However no study of transport impacts has been supplied to the community to assess how the proposals will impact on the community and hence what changes may be necessary in the BEP to address these impacts. Neither are there any figures indicating parking requirements for each of the developments, nor are there assessments of how existing streets will handle the additional traffic especially the railway line bottlenecks. With City Council reviewing its City Plan at present this should be undertaken as a joint program.

5 Heritage

The provisions in the RWA Act lessen the heritage obligations on the RWA in dealing with heritage items that are judged to provide an obstacle to the development of the RWA's area. Given the large number of heritage sites within the state significant areas it is essential for the RWA to produce a Heritage Plan which details how each of these sites are to be dealt with. As stated earlier it is impossible to agree to the changes proposed when the Plan allows for changed FSRs and zoning over existing heritage items.

The zoning for the commercial core and the Block encourage site consolidation of existing buildings which are part of the heritage fabric of the area.

Without a public Heritage Plan it is difficult to understand if the BEP will result in a retained heritage fabric along Regent Street or if it will result in the loss of the heritage streetscape and a creation of a brand new commercial centre.

Similarly, the reduced residential zoning proposed for the Block coupled with low commercial FSRs compared to other areas close to the station are likely to drive a consolidation of the AHC owned sites which would result in the loss of part of the Lawson Street terraces which are said to be one of the longest run of identical terraces remaining in Sydney.

A Heritage Plan is required before the BEP proposals can be properly assessed and reflected in a SEPP.

6 Obligations to the Community

Even in preparing the BEP the RWA needs to have concern for its responsibility to the community that lives within the area. Its responsibilities include encouraging an "active, vibrant and sustainable community", to "promote greater social cohesion and community safety" and to

take “into consideration principles of social, economic, ecological and other sustainable development”.

There is significant concern within the community over the potential impact the changes proposed by the RWA will have on existing residents and their families. Increasing real estate prices and the changing nature of housing in the area make it economically impossible for the young locals to buy/rent housing in the area. Those remaining in the area face the potential intolerance of new buyers in the area who may not want to live near public housing or appreciate the cultural and ethnic diversity of the area. These are just some of the concerns.

When much is said about new residents and new workers coming into the area, it is natural that existing residents may feel that what is being built is for the benefit of the future occupants rather than for them, especially if they are a member of a group that the RWA plans will dilute. The RWA needs to address how it will look after the interests of these existing residents and ensure that they have an ongoing place in the future of the suburb. Without careful planning gentrification may force out much of the diversity of the area, so the RWA will need to plan to maintain it and safeguard current resident’s interests.

As the RWA has acknowledged in the BEP, the current document builds on consultations undertaken by the NSW Premier’s Department’s Redfern Waterloo Partnership Project’s RED Strategy in 2003. While this predates the RWA, the RED consultation was between the community and representatives of the NSW Government about the future shape of the Redfern Waterloo Community. The RWA must take the community input from these consultations into account.

REDWatch has produced an analysis “The Redfern Waterloo Plan as seen through the RED Strategy Looking Glass” which is attached. In that analysis we point out that a number of the areas of concern that were incorporated into the RED consultation documents have not been picked up by the RWA in the BEP or the other Plans. Core principles from the RED Strategy such as “Provide a Safe and Activated Public Domain”, “Ensure Social Equity in Public Life”, “Foster Community Identity” and “Strengthen Community Cohesion” also need to be taken up by the RWA in its Plans.

REDWatch requests the RWA to revisit the RED Strategy principles and strategies, and its own objects, to see how the community concerns which have not yet been taken up by the RWA can be incorporated into a broader RWA Social Plan.

7 Consultations and Engagement

REDWatch remains concerned that the RWA has failed to take the opportunity to adopt best practice models for community consultation. As mentioned at the start of this paper in May 2005 REDWatch made a submission to the RWA encouraging a community focused model which the RWA has ignored.

While we appreciate that the RWA was keen to get a BEP on the table and did not want to talk about it for years before having something to work with, REDWatch strongly believes that the RWA needs to work with the community much earlier in the preparation process so its plans when formally exhibited reflect a product of earlier dialogue with the community.

The RWA has failed to do the hard work upfront necessary to create a BEP that the community can support. This flawed process and its potentially spasmodic and opportunistic outcomes leaves the community with no formal way to address community concerns and needs except through elongated and robust reactive processes which will potentially delay the implementation of the Plan and lessen community support for the changes sought by the RWA.

It is of concern that the RWA did not fully incorporate the Principles and Strategies of the RED Strategy consultation into its own plans for Redfern-Waterloo. This was the last community consultation on the government’s plans for the area and community input should have been given greater weight in preparing the BEP and other Plans.

REDWatch is further concerned that the only community input into the BEP process has been by written response to the BEP exhibition and that the RWA does not currently plan to bring the rework of the Plan back to the community for further consultation prior to it being adopted by the RWA.

REDWatch has recommended that the BEP should be reworked in light of the feedback from this exhibition and then brought back for further consultation with the additional information necessary for the community to be able to understand the RWA's BEP and make informed comments on it.

REDWatch also is concerned that the SEPP was exhibited simultaneously with the BEP rather than the RWA having a consultation on the BEP and then formulating a SEPP based on a BEP incorporating changes from the community consultation.

REDWatch is of the view that the Redfern-Waterloo Plan (RWP) should include a public statement of the RWA's communication and community engagement strategy. REDWatch has made earlier submissions on what we believe should be included in such a strategy. However a roundtable community workshop on this topic might be a useful way of arriving at a broader community view that could be incorporated into the RWP.

8 Public Housing

Many of the issues raised in this submission regarding the need for integration, the obligations the RWA has to the existing community and the need for an improved consultation and engagement process apply especially to public housing tenants and will be important in Stage Two.

Independently of Stage Two REDWatch recommends that the RWA establish a working group including public tenants to explore what the RWA can do to ensure the concerns and issues of current public tenants in Redfern Waterloo are properly addressed by the Department of Housing and other government human service agencies.

REDWatch also encourages the RWA to undertake Stage Two of the Human Services Consultation as early as possible and to include in that consultation an assessment of accommodation and support service needs for the service sectors covered so that these requirements can be taken up in planning for the former Rachel Foster Hospital and Stage Two of the BEP to ensure adequate accommodation and support services within the area for those in the community who need these options.

In addition REDWatch also recommends that the RWA conducts a consultation with the Redfern Waterloo Public Housing communities to establish how they wish to be involved in discussions, committees and other communication and engagement processes associated with the RWA's planning for Stage Two of the BEP.

REDWatch is strongly of the view that Redfern Waterloo public tenants must be involved in all stages of planning for Stage Two and that under no circumstances should consultation start with the exhibition of a Stage Two BEP and accompanying SEPP.

Any plans for affordable housing must also address housing options for those who through changed circumstances, such as employment, may be forced out of public housing but be unable to afford accommodation in the private sector within Redfern Waterloo.

The RWA also should explore the full spectrum of housing needs within Redfern Waterloo including the requirements for supported accommodation, aged accommodation, student accommodation and short term accommodation and solutions to homelessness when assessing the needs and priorities for affordable housing and housing choices

REDWatch Concerns on Specific RWA Strategic Sites

We note the aims of the SEPP on exhibition are:

- (a) to provide for the redevelopment of the Redfern-Waterloo area in a manner consistent with the principles in the Sydney Metropolitan Strategy, and*
- (b) to increase building density around Redfern Railway Station and to provide for a diversity of land uses in the area, and*
- (c) to encourage the revitalisation of the Redfern-Waterloo area by enhancing employment opportunities in the area, and*
- (d) to provide for development controls in relation to the land to which this Policy applies, whether the development is carried out under an approval under Part 3A of the Environmental Planning and Assessment Act 1979 or a development consent under Part 4 of that Act, and*
- (e) to implement the Redfern–Waterloo Plan prepared under the Redfern–Waterloo Authority Act 2004.*

We note at the outset that all government owned lands within the Plan are shown as gross FSRs while private lands exclude roads and are shown as net FSRs. The result of this difference is that final FSRs on government sites will be higher than what most people commenting on the exhibition will have understood from the BEP. This will be especially so given the increased FSR allocated to some heritage sites where existing heights would have been appropriate. This additional FSR may be transferred to another part of an adjoining development.

This difference in the handling of FSRs means that the straight numerical comparison between FSRs on private land at the Block and FSRs on government land at North Eveleigh understates the preferential zoning provided by the RWA to land under its own control and the extent to which development on the Block has been limited by the SEPP.

We also note that there are no residential limits in the BEP and SEPP on the commercial core and given the experience in other locations it seems likely that the commercial core may end up with a significant residential population due to market forces. It is of concern that the RWA has not released any figures for how it has arrived at the estimate of 18,000 jobs and 4,000 residents for the BEP Stage One area and in particular how many of these it expects will be located in the commercial core. The omission of a residential cap on the commercial core makes these figures look very rubbery.

We note also that in the Land Use Zoning there is no where for light industrial or other industries that might suit trades people or blue collar employment in niche industries that service the area, other than possibly at the ATP. These uses are not permitted under the mixed use category and given the RWA's employment focus and the skill set of many people in the local area such a zone should be included in the BEP and resultant SEPP.

There has been widespread community opposition to the heights proposed for the tower developments in the BEP. The RWA has said in briefings that this height is there at the suggestion of architect consultants who have advised them that higher buildings may have less of an impact on the area than smaller stocky buildings. No information has been presented to the community to support this contention. There is also community concern about wind tunnel effects around the site and information on wind impact is also needed.

In general there is a belief that the RWA has pushed up height limits above acceptable limits given the surrounding built form.

While the BEP draws comparison of the proposed zoning with the existing zoning under the South Sydney LEP, it should be noted that the City of Sydney is currently reviewing their development controls for the area and discussion about how the BEP and the new City of Sydney controls will operate in adjoining areas should also be discussed with the City of Sydney to provide the best possible transition between City of Sydney controlled sites and RWA sites.

It is also important that the BEP should take into account the Redfern Waterloo Community Safety Plan and seek to work with the Plan to maximise community safety in all developments covered by the BEP. The Safety Plan has been developed by State Government, Local Council and the Community and represents one of the best examples of how co-operative planning can benefit the community of Redfern-Waterloo.

Following on from these general comments we wish to make comments specific to the proposals in the BEP and SEPP for specific State Significant sites.

1 Australian Technology Park (ATP)

REDWatch notes that the RWA has taken the opportunity of the BEP to increase the floor space of the ATP by 20% over the earlier Master Plan. We also note that the City of Sydney submission states that a height of 6 storeys is in keeping with respecting the scale of the heritage buildings within the ATP and we support the City of Sydney contention that 9, 10, 11 (and 12 storeys in the South Eveleigh addition to the ATP see 3 below) are excessive.

We will deal with linkages to North Eveleigh in the next section.

2 North Eveleigh

The North Eveleigh site is significant due to the number of heritage items contained on the site. The failure of the BEP to explain how these will be dealt with is a major omission which makes it impossible to form a view about what is proposed for this site.

This omission has been compounded by the BEP & SEPP not maintaining existing height controls over heritage items such as the Blacksmith Shop, Paint Shop and Carriage Works which have all been zoned to allow 4 storey developments rather than at existing heights. The BEP does not state if the RWA plans to preserve these buildings and the railway fan, or if they are to be replaced by buildings up to the specified heights. If the heritage buildings are to be maintained then the RWA should zone these at existing heights and increase densities on other parts of the site rather than by creating a zoning that allows it to take unused FSR from heritage buildings and add it to adjoining sites.

The North Eveleigh site contains many differences between the BEP, on which most people will have made their submissions, and the SEPP. These differences are important when assessing sight lines and the visual impacts of the RWA proposals as people in all probability have made their submissions on the BEP but the SEPP planning law puts them in a different position. Below we have detailed some of the major differences between the BEP and the SEPP.

- North East corner of proposed iconic 16 storey building lines up with Ivy Street on SEPP, but on BEP the middle of this building lines up with Ivy Street
- The 10 storey building height proposed to the west of 16 storey building lines up to western side of Shepherd street in SEPP, but extends significantly further west in BEP
- Eastern edge of existing height zoning lines up with Codrington Street on BEP, but goes further east on SEPP.
- The 10 storey height to the west of arts centre is aligned with front of existing zoning in SEPP but not in BEP.

We note that while attempts have been made to create a transition from the surrounding scale of the existing buildings to the proposed RWA scale, this has not been made along Iverys Lane where 4 story buildings will abut existing low rise housing without the mitigating effect of the Wilson Street cutting. While the stepping proposed around the edge of the site lessens the foreground impact, the heights proposed are of significant concern to surrounding residents who will lose their mid and long range views.

The BEP proposes linkages between the ATP and North Eveleigh. REDWatch supports improved connectivity between North and South Eveleigh and believes that the RWA should work towards three linkages; one at the eastern end as currently proposed; one at the arts

centre and; a third on the western end linking say near Explorer Street to Holdsworth Street or near Iverys Lane. These three linkages would recreate what we understand to have been the earlier linkages within the site and would allow the railway line to become more permeable. Such crossings must ensure that the connections are designed to maximise personal safety and reduce the opportunities for crime.

REDWatch cannot support the proposal for a vehicular tunnel connecting the ATP and North Eveleigh given that there is currently no location, rationale or costing for such a connection. We are of the view that pedestrian and bicycle connections address the major local linkage requirements both between the ATP parking and the Arts Centre as well as the linkage requirements of residents in surrounding streets.

The requirement for the vehicular tunnel connection seems to be primarily concerned with addressing regional and arterial linkages rather than local linkages. A much higher priority for a tunnel would be as part of a solution to the traffic using the arterial roads dissecting the area next to Redfern Railway station.

The development proposed for North Eveleigh will significantly impact on local traffic and parking. It is crucial for the RWA to produce a Transport and Traffic Plan enumerating the traffic loads and providing proposed solutions to the issues raised by this traffic. In this context a north south connection across the railway line to Lawson Street and Erskineville Road may be required.

Any traffic planning for Wilson Street needs to take into account its importance as a major regional bike route. The idea of a road tunnel emerging onto the bike route, as some people have interpreted the BEP, has been of concern to bike users. This impact needs to be carefully addressed in a Traffic and Transport Plan.

Finally as a major brown field site the RWA has to plan for open space within the development. No such plans have been presented and it can only be assumed that open space is proposed to be handled at a later time with the FSR over that open space going to surrounding buildings. This is the opposite of what has been proposed on AHC land on the Block. The RWA needs to come back to the community with proposals for the quantity and location of open space proposed in North Eveleigh when the BEP comes back for further exhibition and consultation.

3 South Eveleigh

The predominantly business zone in this site is in effect an addition to the ATP and the comments relating to the ATP should also apply to this site. Unlike the ATP site, the entire area is zoned for buildings and there has been no allocation of open space.

There are again heritage issues on this site which have not been addressed in the BEP but according to the plan they will be "where practical". Currently the BEP and SEPP show the area of the large Erecting Workshop and other heritage items zoned for 12 and 4 storey development. This is taller than any buildings proposed for the existing ATP and is twice the building height suggested by the City of Sydney Council as being in line with the heritage nature of the area.

It should be noted here that the land use zones A & H shown on the SEPP are not shown on the south west edge in the BEP.

4 Eveleigh Street

The treatment of the Eveleigh Street precinct is in direct contradiction with the aims specified in the SEPP. The SEPP aims state that the SEPP is to 'to increase building density around Redfern Railway Station' and yet this site, close to the railway line, has densities significantly less than other sites farther away.

The proposed combined net FSR increase from 1:1 to 1.5:1 is much lower than the 2:1 gross FSR the RWA has proposed for their own site on the Eastern section of the North Eveleigh site.

It is also much lower than the 7:1 proposed for the commercial core and for the residential development on the opposite side of the railway line. Based on this it would appear that the Eveleigh Street Zone and the AHC, which is the major land owner on the site, has been provided with an abnormally low height and low combined FSR zoning for this site. This is the only site in the BEP where the RWA has no significant land holdings.

The reduction of the residential FSR has been the subject of much comment and REDWatch is of the view that it is discriminatory to reduce the proposed residential FSR from that which pre-existed on the site. Based on the residential development on the opposite side of the railway line and the lack of restriction for residential in the FSR of the commercial core, there is a strong basis to say that the residential FSR for Eveleigh Street should have significantly increased on what existed prior to the Draft BEP. It definitely should not have been reduced below the pre-existing 1:1.

Given the AHC's ongoing desire to build a residential development as part of the Pemulwuy Project, the proposed reduction would require site consolidation and development to extract the residential floor space. In doing this all heritage items within the zone would need to be removed. One consequence would be that part of the Lawson Street terraces, may need to be destroyed to make a development feasible. These terraces are said to be one of Sydney's longest row of remaining terrace houses and part of the terraces fall into the RWA's Eveleigh Street Zone and the remainder come under the planning control of the City of Sydney.

REDWatch notes and objects to some other ways in which the Eveleigh Street site has been denied FSR when compared to the Government's own sites. In the SEPP the FSR on North Eveleigh covers the entire area including potential roads and heritage buildings while the FSR on the Block and other private land excludes roads and lanes.

It should be noted that the BEP and SEPP also differ in Eveleigh Street. The BEP land use, height and floor space ratio maps include Caroline Lane and the lane running between Louis and Eveleigh Streets while the SEPP excludes these areas which would have contributed FSR to the AHC project. This is opposite to the provisions in North Eveleigh.

In addition land, previously occupied by AHC owned houses, which falls within the current Pemulwuy Park, has been zoned as public recreation thus removing the use of its FSR from the AHC. REDWatch supports the AHC proposal that the FSR from AHC land in the park be included as part of the development rather than zoned to remove it from the AHC's development.

Finally we wish to draw attention to the contrast between how this area is treated under the BEP with what was proposed in the previous consultations during the RWA's precursor the RED Strategy which can be downloaded from the following link <http://www.redwatch.org.au/RWA/maps/RED%20Town%20Centre.jpg/download> . Under RED the focus for the town centre opened out onto a square in front of the Lawson Street entrance to the station.

One of the crucial aspects of having the square opposite the current Lawson St railway station entrance was that it was one of the only places that provided a connection for pedestrians between the east and west components of the area to include those going towards the University of Sydney end of the area across the railway line. The RED proposal was about bringing together the overall community whereas the current BEP proposal turns its back on this and closes the western community off from this civic space.

Under RED the entrance to the Block area was opened up visually into the square and the Aboriginal heart of Redfern was integrated into the development. Under the BEP the focus moves south towards the ATP and Waterloo and the western part of the area including the Block is left isolated and cut off. This change in the future shape of Redfern seems to reflect the unfortunate direction taken since the establishment of the RWA and the decision of the Government not to support the Pemulwuy project. In making this shift the RWA's BEP fails to explore an alternative way of creating a public space that includes both Aboriginal and non Aboriginal cultures to both the west and the east of the station.

REDWatch supports the AHC's plan for the use of its land for the Pemulwuy Project with its plan for a residential component of 62 Gadigal apartments. The BEP and SEPP should create non discriminatory planning frameworks for the land in the Eveleigh Street precinct rather than propose reductions in allowances which give effect to the wishes of the Minister and the NSW Government not to support the Pemulwuy project.

We remind the RWA that their act requires the RWA "to promote, support and respect the Aboriginal community in Redfern-Waterloo having regard to the importance of the area to the Aboriginal people".

5 Redfern Railway Station, Gibbons and Regent Streets

Much of the BEP revolves around a new Redfern Railway Station however there is no firm plan yet for the railway station. It is hence impossible to get an understanding of how the area around the station will interface with the station. To be able to comment on these aspects of the BEP it is necessary for the proposal for the station to be made public. As this is expected later in 2006 REDWatch recommends that an amended BEP be re-exhibited when plans for the station are ready.

The Gibbons and Regent Street site in effect covers developments on both sides of Gibbons Street. On the western side of Gibbons there are proposed development controls for government owned land abutting the railway lines and above the eastern suburbs railway line. On the eastern side through to Regent Street there are matching controls for privately owned land.

Here again there are significant differences between the information provided in the BEP and that which would become planning regulations under the SEPP. Most significant is Marian Park where the BEP shows the proposed 5 to 18 storey development only on the northern portion of the park in line with Margaret Street and a pocket park for the remainder. The SEPP however zones the entirety of Marian Park, with the 18 storey zoning coming in line with Margaret Street and the 5 storey zoning taking up the remainder of the existing park. Clearly anyone using the BEP to make their submissions will miss what has been proposed in the planning regulation. This is a major blunder on a contentious proposal in the BEP and SEPP.

The Marian Park proposal is of significant concern to REDWatch as the BEP and SEPP proposals, while different, both remove long standing publicly used green parkland from community use and replaces it with an allowance for up to 5 and 18 storey buildings. Redfern Waterloo already has a small per capita quantity of open space and this removal will decrease the per capita open space even further while increasing the population.

REDWatch is of the view that Marian Park should be zoned public recreation and should not be built upon as proposed by the BEP.

Presumably in another drafting error, the 7 storey building allowed for the corner of Lawson and Gibbons Streets is a different size in the SEPP to the BEP and under the SEPP part of the building would be allowed to be built above the main railway lines.

The Civic Space is not specially zoned in the SEPP and its existence is not guaranteed. The Civic space is only one of the allowable land uses for land within the commercial core. REDWatch is of the view that the Civic Space should be clearly defined within the SEPP, not just by acceptable use and the absence of height and FSR zoning for the Civic Space as is currently the case.

In addition the linking of the Civic Space to Redfern Street appears of significantly different size in the BEP to the existing public space which appears to be the same as that shown on the SEPP. The artist impression in the BEP looking towards Redfern Street from the station reflects a wider public space than in the SEPP.

REDWatch notes that the RWA has placed no restriction on residential floor space in the commercial core. REDWatch believes that the BEP must make further provision for open space in close proximity to the commercial core for the residents the RWA expects to occupy this area.

This space should be in line with our earlier comments on open space requirements. While the RWA have made calculations about the residential proportion expected in their employment and residential expansions for the combined state significant site they have not released residential figures site by site. Under the current proposals it is possible that a reasonable proportion of the commercial core site may be residential, especially if there is not the demand for commercial property at the time of construction. The RWA needs to provide public open space in the core area in proportion to the number of residents that are expected to occupy the residential component of the Commercial Core.

While the BEP and SEPP currently propose to step development up from the existing two storeys on Regent Street, on Gibbons Street all developments are shown as flush to the street. While there is no existing streetscape to preserve on Gibbons the design principles should also probably also apply and the building height and mass should be moved towards the centre of the development. Failure to do this will result in Gibbons Street being totally flanked by five potential 18 storey towers and their surrounding 5 and 7 storey buildings creating a sheer physical canyon which will exacerbating the height of the buildings and increase wind tunnelling along the arterial road that bisects the commercial core. Given the proposed scale it is likely that even with some stepping the effect will be overbearing.

Shadowing from this line of 5, 7 and 18 storey buildings on the surrounding area is a major concern. Redfern, like parts of the city is set to become a suburb in afternoon and morning shadows. No impacts of this scale of development have been provided to assess the shadow impact on the areas around the commercial core of the scale of development proposed.

In the transport section of this submission we have already made reference to the need for the BEP to include a transport interchange in the commercial core and the necessity to mitigate the effect of the arterial roads which threaten the functionality and amenity of the station and commercial core.

6 Former Rachel Forster Hospital

REDWatch remains concerned that the RWA has still not conducted any consultations on the needs for aged and health care in the area or for supported accommodation needs.

REDWatch is strongly of the view that Rachel Foster is ideally situated as a location for aged care, supported accommodation and associated health services and hence REDWatch continues to find the RWA proposals to sell this site for housing development premature and ill considered.

REDWatch is of the view that current health services conducted from this site should remain there until a full assessment of the health needs of the Redfern Waterloo area indicates it is no longer needed. REDWatch understands that the hospital buildings are in good repair and that it may be possible to rent the premises to a healthcare provider thus returning an income stream to the RWA as well as health services to the community. This should be explored as an alternative to sale of the site.

There is a strong historical link between the community and the Rachel Foster Hospital dating from the community fundraising that contributed to building the hospital. It is very much seen as a community resource and the RWA should find a use for the building in line with community expectations.

7 Former Local Court House and Redfern Police Station

While the court house is no longer used by the Attorney General's Department, there are a range of other community justice activities which could continue to make appropriate use of the building continuing its legal tradition. As the RWA also has responsibility for human service delivery and other government services in the area, the RWA should explore the possibilities of using this space for circle sentencing and other legal and community uses.

Any development of the former Redfern Police Station must be in line with an infill development maintaining the character of the area and it should conform to new City of Sydney control plans being developed for the area.

8 Former Redfern Public School

REDWatch is very concerned that the BEP and SEPP do not preserve the former school "oval" as open space in line with what we understand to be the heads of agreement for the sale of the school site. Currently the BEP and SEPP show the open space being zoned for 4 and 7 storey buildings.

The former school "oval" is currently used by the public as open space and as much as is feasible under the ownership of the ILC, if the sale proceeds, the area should remain both green space and accessible to the public.

This open space will be a significant green space for residents of the proposed commercial core due to its proximity to the commercial core. Even if Marian Park remains there will be a need for greater open space easily accessible to the commercial core to meet per capita requirements.

REDWatch also notes that the SEPP does not reflect the opening up of the former school site roads as described in the BEP.

Finally given the increase in population proposed as part of the RWA's planned developments, REDWatch is of the view that the sale contract should provide the option for the site to be resold to the NSW state government for educational purposes should the ILC wish to dispose of the site in the future. This would enable the site to be returned to state ownership and used to meet future government service needs in the future if the ILC wished to cease operating a community education and recreation facility.

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REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area covered by the Redfern Waterloo Authority). REDWatch monitors the activities of the RWA and other government bodies and seeks to ensure community involvement in all decisions made about the area.

REDWatch meets at 2pm on the 4th Sunday of the month at the Factory Community Centre.

More information about REDWatch and the issues of concern to us can be found at:
www.redwatch.org.au

Addendum

The Redfern Waterloo Plan as seen through the RED Strategy Looking Glass

The RWA has now released the Draft Built Environment Plan (Stage One) for consultation. This plan along with the Human Services Plan (Phase One but not named as such) and the Employment and Enterprise (which we hope is only stage one as there is much left unaddressed), make up the initial Redfern Waterloo Plan (RWP) required under the Redfern Waterloo Act that established the RWA.

We know from the documents that make up the RWP that there are four aspects of human services not yet incorporated into the human services plan. These are services for migrant communities, the aged, people with disabilities and homeless people. Plans for these are to join the plans for services for children and families, young people and Aboriginal people which were in the initial Human Services Plan. Health services seemed downplayed in the initial Plan and hopefully more will follow on this aspect in the second phase.

We also know that the [Proposed Stage Two of the Built Environment Plan](#), subject to the Minister's guarantees to public tenants, will add plans to "revitalise public housing stock, improve the associated public domain, reduce concentration of public housing, increase the local population to establish a more sustainable social mix [and] facilitate the provision of affordable housing, including a shared equity model of home ownership." This work on public housing will add to all the above Plans in determining what will happen on all remaining NSW government land in Redfern-Waterloo.

We now have a reasonable idea of where the RWA is going with the RWP, so we can now look at how to evaluate it. The RWA in their Built Environment Plan (BEP) acknowledge the Plan draws on "earlier work and community consultation undertaken ... as part of the Redfern, Eveleigh, Darlington and Waterloo (RED) Strategy in 2003" so we can go back to look at the outcomes of that consultation and compare these with the RWP now taking shape.

Three RED Strategy documents provided the basis for consultants' reports on the RED Strategy. These were - what [the consultants said the community wanted](#) during the RED Strategy consultation, [the core principles](#) agreed with the community and [the major issues](#) to be addressed (which were accepted by the RWPP Community Council and reported to the last RED Strategy Community Form in December 2003). The final document useful for comparison could be the [SMH's leaked cabinet documents](#) which indicated the government's thinking on the Redfern Waterloo Plan in October 2004 when they decided to establish the RWA but we have not gone into this in detail here.

Of the nine major RED issues identified in December 2003, three issues require much more work than is currently evident in the RWP. These areas are

- reduce the impact of regional traffic
- community transport
- enhanced public domain

The SMH papers told us that the government had looked at a number of tunnel options to get the arterial traffic out of the Redfern Waterloo town centre and then recommended a pedestrian bridge from the station to Redfern Street. The RWA Built Environment Plan recognises regional traffic as a major problem that "physically dissects the Redfern Railway Station from the Redfern Town Centre" but it is unable to come up with a solution and concludes "the solution may require a more strategic response which takes into consideration broader metropolitan and regional traffic issues and may not be imminent". (p15) The minimisation of "rat runs" impacting on the local area has also not been addressed.

Transport discussion in the BEP focuses on links to and from the station, but does not address the community issue of linkages for people who live in the area to the station and facilities like "Royal Prince Alfred Hospital and St Vincent's Hospital", or to "regional and local open space", the proximity of which the Plan says makes them "highly accessible" to Redfern Waterloo. In a community in which half the people do not have cars and transport services primarily pass through the area on their way to or from the city, local community transport becomes crucial for those that live here now as well as in the future. Some indicators of a successful linkage are whether you can get reasonably priced frozen peas and ice-cream home before they thaw on public transport or whether you can get to a hospital or open space in a reasonable period of time at reasonable cost if you are aged or infirmed.

The enhanced public domain gains a mention as needing much more work in large part due to the green space that has disappeared in the current draft RWP. The Redfern School oval which the RED people said

should be retained as open space even if the school was sold off is not guaranteed on the current RWA proposed maps. The RWA CEO in evidence to Budget Estimates has recognised that “the way we have put the maps for the school site in this plan creates an incorrect impression that that sporting oval could be built over ... so we intend to take those comments on board when we finalise this plan and clarify it.”

While it looks like there will be an oval at the old school site the map of the park next to the “Water Tower” in Rosehill Street that the RED Strategy showed as “public open space” in their vision map of how Redfern Waterloo could look has also disappeared. The State Environmental Planning Policy (SEPP) shows it all zoned for buildings and the BEP shows only a small pocket park remaining next to buildings up to 5 and 18 storeys. The BEP makes no mention of this loss of public open space in an area which is recognised by both the RED consultants and the Council as having very low per capital open space. In addition the BEP makes no provision for additional open space other than the civic square in front of the station and the space which may be able to be fitted in around developments in the height versus Floor Space Ratio (FSR) trade off.

Floor Space Ratios (FSR) are the proportion of floor space allowed compared to land area, so 2:1 indicates there can be twice as much floor space as land area (sites allowing mixed use will normally specify a maximum FSR for the site as well as a maximum residential FSR for the site). Height restrictions indicate the maximum allowable heights. Height and FSR interact so at a FSR of 2:1, a building of 4 storeys might only cover half the land area, depending on the design and other development requirements. In this way open space may be created around buildings but unless it is a development covering a large area public space created is usually small and not conducive to many active uses.

Enhanced public domain is not only about open space, it is also about community safety and the amenity of the streets we live in and walk down. Apart from Redfern and Regent Streets, nothing has been said about enhancing the village shopping strips or about the RWA's investment into community safety so that the local people feel comfortable in getting around the area and visiting the planned new shopping strips. The RWA lack of involvement in the ongoing Redfern Waterloo Community Safety Taskforce has hardly been encouraging to those concerned about this aspect of the public domain.

The RED Strategy Major Issues that seem to have been picked up in the RWP are listed below although in some cases we will have to wait a while longer to see what is finally delivered:

- redevelopment of Redfern Railway Station (Plan out later this year)
- creation of pedestrian and bicycle linkages across railway lines
- provision of affordable housing and no reduction in public housing
- a revitalised town centre
- increase in employment opportunities
- the development of the area as a cultural precinct.

One major concern in the BEP is the omission of any articulated vision for the area. While a vision gets a mention in the document no vision is outlined. With the break up of the RED Strategy into three separate parts the BEP becomes primarily a planning document and the broader vision, principles and integration strategy fall between the cracks of the three plans.

If we go back to the RED Strategy Core Principles developed with the community you find that, of its seven Core Principles, the RWA Plan is strongest on three:

- Develop a Sustainable Town Centre to Serve the RED Area
- Capitalise on Redfern station's location in the RED area, infrastructure potential, and position in the Metropolitan rail system to support revitalisation of Redfern Station and Town Centre precincts
- Optimise Social and Economic return from Government Land Holdings

The remaining four Core Principles are in need of much greater attention by the RWA. These are:

- Provide a Safe and Activated Public Domain
- Ensure Social Equity in Public Life
- Foster Community Identity
- Strengthen Community Cohesion

Each of these seven Core Principles identified in the RED consultation contained a number of detailed strategies to implement them and a detailed examination of the strategies associated with each principle shows a number of areas needing improvement. These are generally in line with the RED Major Issues previously mentioned.

These RED Strategy Core Principles arose from the feedback received by the RED consultants to the proposals initially floated by them. Many of the comments recorded in the [RED second presentation](#) as

community feedback remain important issues and many are yet to be addressed by the RWA in its Redfern Waterloo Plan.

It is important to remember that in December 2003 the Premier's Department's Redfern Waterloo Partnership Project promised the community that they would work on these proposals and then bring them back to the community for further consultation as a RED Strategy to address the issues raised during the consultation. The issuing of the Redfern Waterloo Plan in its various parts by the RWA is in effect the RED Strategy coming back to the community after a delay of two years. During the delay the government decided to change the implementing body from the local council to the RWA and to do this before they brought back a Redfern Waterloo Plan to the community.

Re-reading some of the RED Strategy documents which are available on the REDWatch website at www.redwatch.org.au/govt/nsw/red/ provides a useful context for considering your response to the Redfern Waterloo Plan. It is of ongoing concern that the government has never released the Cox Richardson Report nor any of the other reports which the NSW Government Submission to the Inquiry into Issues relating to Redfern Waterloo says were produced as part of the RED Strategy. We are sure that these too would help inform the response to the Plan from the diverse communities within Redfern Waterloo that the Plan needs to satisfy.

Geoffrey Turnbull, REDWatch 24th February 2006 www.redwatch.org.au .

Note: Documents underlines are available on the REDWatch website. They are available in text or as black and white images of the presentation slides. Colour images from the RED presentation slides have been added to the RWA maps section of the site at <http://www.redwatch.org.au/RWA/maps/> .