

## **South Sydney Greens Submission to the Redfern Waterloo Authority on the Draft Built Environment Plan**

### **Introduction**

The South Sydney Greens is a local community organisation and political party. Our group covers the whole of the Redfern Waterloo Authority area, and the south-east corner of the City of Sydney Council area.

We are concerned that the draft Built Environment Plan will see a dramatic change to our community, making it more difficult for low-income residents to live in the area, destroying heritage and undermining amenity for all. We support urban consolidation and the adaptive reuse of sites like the North Eveleigh railyard, and we support efforts to build on and improve our community. However, we reject the premise that our community is fundamentally ill or in need of serious government intervention. This is a vibrant community and we are very proud to live here.

We do not believe that the Draft Built Environment Plan is a genuine Plan to improve and strengthen the Redfern Waterloo area and its community, but rather an identification of sites available for development, and the imposition onto those sites of the maximum possible building envelope to maximise commercial profit. The level of development in the Draft Plan ignores proper planning considerations, heritage, urban design, ESD, the amenity fundamentals of solar access, light, ventilation, and open space. It is a reductionist approach, where as 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. As a result, the Draft Plan will not deliver the upgrades and improvements needed by the people of Redfern/Waterloo.

We are equally concerned by the proposal to limit development options on Indigenous owned land, while not applying those same limitations to publicly owned land.

The Greens call on the Redfern Waterloo Authority (RWA) to reconsider its approach. We ask that the draft Built Environment Plan be withdrawn. We ask that proper community needs, public open space, transport and traffic plans be developed before a new Built Environment Plan be offered to the community for comment.

#### **Contact Details:**

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## Summary of recommendations

We recommend that:

- The current residential floor space ratio for the Block be retained.
- the RWA allow the City of Sydney Council to determine any development application for the Block on its merits.
- the RWA work with the AHC and the Indigenous community to ensure new Indigenous housing is constructed according to the wishes of Indigenous people.
- the development provide for urban consolidation through residential development in keeping with the character of the area, rather than large scale commercial buildings.
- commercial development focus on shop fronts linking existing commercial strips on Redfern, Regent and Abercrombie Streets to the station.
- FSR and height ratios reflect the surrounding suburbs and be in keeping with the history of each area.
- developments seek to build on and enhance the existing character of each area rather than dramatically transform areas.
- all FSRs be confined to areas that are planned for commercial and residential development and exclude public open space, roads and streets. This of course requires that plans for open space be developed prior to the finalisation of the Built Environment Plan.
- Clear targets for affordable housing be set prior to any private development and that these targets increase the available stock of affordable housing in the area.
- The RWA investigate mechanisms to support cooperative housing as a primary form of affordable housing in any new development. This may include tax concessions, access to cheap loans, assistance with securing accommodation, assistance with governance issues or the provision of accommodation as part of new private developments. Such schemes contribute to social cohesion and community strength.
- No public private partnerships are instigated for the provision of public housing – the community has learnt time and time again that such ventures divert government funding to corporate coffers.
- The RWA commit to increasing the absolute amount of public housing in the area as part of the redevelopment.
- the funding base of the RWA be changed to ensure that the administration of the Authority and the maintenance, and any necessary upgrade, of existing public facilities is financed out of consolidated revenue.
- the RWA commit to retaining ownership of all government owned land.
- A plan for public open space be developed prior to the finalisation of the Built Environment Plan.
- the final Built Environment Plan allow for an increase in the ratio of public open space per person, using the City of Sydney average as a guide.
- all of Marian Park, including the current car park on the railway end, be zoned open space, and that the RWA investigate the sale of the park to Council.
- the bulk of the Redfern School playground be zoned open space and the RWA ensure public access to the site.
- open space be provided away from arterial roads to allow children to play in parks with minimal parental supervision.

- A pedestrian and cycle plan be developed and incorporated into the Built Environment Plan before it is finalised.
- Pedestrian and cycle bridges be built at both ends of the North Eveleigh railyard, and in the middle of the site connecting to the new Arts complex.
- The proposed road tunnel under Wilson Street be scrapped.
- Light rail and Cat bus services be considered for providing internal transport within the area.
- Strict limits on car parking be applied to new developments, including of car-free development near the station and the provision of car pooling onsite in larger residential developments.
- Traffic on Regent and Gibbons Streets be addressed, possibly by converting one-way to two-way streets.
- Future planning be undertaken of community needs in the Redfern area and proper provision be made for future health, aged care, educational, recreational and other needs.
- The Redfern Waterloo Authority Act and the recently passed Environmental Planning & Assessment Amendment Act be revisited to ensure the RWA is subject to the Heritage and Environmental Planning Acts, that planning authority is returned to the CoS, with the RWA to work with the CoS and CSPC on large developments, and that all documents of the RWA and RWA committees are made available to the public, subject to the privacy of community members.
- public space, transport, traffic, future community needs and public and affordable housing plans are available prior to the adoption of a final Built Environment Plan, with adequate time for public consultation after the release of these plans.

## **Sections of Submission**

Accountability

Aboriginal Land

Maintaining the Residential Nature of the Area

Heritage and Planning Issues

Public and Affordable Housing

Financing Development and Land Sale

Open Space

Transport

Community Infrastructure

## **Accountability**

The South Sydney Greens remains concerned by the way development decisions are being made in the Redfern Waterloo Authority (RWA) area. The RWA, along with the Executive, have considerable powers to override heritage laws, lease and sell government land, construct plans and override the planning powers of local government. Furthermore the RWA and the Executive now have the power to act as developer, owner and consent authority, creating a clear conflict of interest. The SSG believes these powers to be excessive and will lead to development decisions being led by development and commercial imperatives, rather than the long term interests of the community.

The SSG believes the decision to wrest development and planning powers from the City of Sydney Council (CoS) was unjustified and misguided. The NSW Government, through the Central Sydney Planning Committee, already had considerable power to influence (or even determine) planning and development decisions within the normal planning process. The decision to transfer some planning power to the RWA, whilst maintaining others with the Council, has already led to significant tension between the RWA and the CoS, and could potentially lead to poor coordination between these bodies. The transfer of power also centralised decision making in bureaucratic and executive levels of government, taking these powers away from representatives directly elected by the people of Redfern-Waterloo. We believe that this is fundamentally undemocratic.

The Draft Built Environment Plan is the latest in a series of proposals that have been presented to the community for 'consultation'. It is of significant concern that proposals made by the community in previous consultation processes appear to have been ignored or disregarded in the development of the Draft Plan.

Critically, there is no solution to the vexed problem of the division of our community by Regent and Gibbons Streets. There is no plan for transport or additional open green public space. There is no provision of transport to the southern and eastern part of the RWA area. These were central concerns aired by the community in previous consultations and appear to have been simply ignored in the development of the most recent plans. Such disregard gives the South Sydney Greens little confidence in the current process of consultation.

Finally, the RWA was established as a development entity, but has since had other responsibilities allocated to it following the termination of the Redfern Waterloo Partnership Program. However, the detail of the Draft Built Environmental Plan, compared to either the Human Services Plan or the Employment and Enterprise Plan suggests that development remains the RWA's prime concern. While we acknowledge that the Draft Built Environment Plan forms only one part of a much broader vision for the area, we are concerned that the RWA remains primarily a development corporation rather than a community development body.

The SSG recommends that:

- The Redfern Waterloo Authority Act and the recently passed Environmental Planning & Assessment Amendment Act be revisited to ensure the RWA is subject to the Heritage and Environmental Planning Acts, that planning authority is returned to the CoS, with the RWA to work with the CoS and CSPC on large developments, and that all documents of the RWA and RWA committees are

made available to the public, subject to the privacy of community members.

- Ensure that public space, transport, traffic, future community needs and public and affordable housing plans are available prior to the adoption of a final BEP, with adequate time for public consultation after the release of these plans.

## Aboriginal Land

The whole land area of the Redfern Waterloo Authority lies within the lands of the Gadigal people of the Eora Nation and the Dharug language group, a people largely wiped out by smallpox and whose survivors were driven out of the area by the British colonists and merged with neighbouring indigenous groups. This land was never sold, and never ceded to the land's current title holders.

One area of Redfern that is today in the hands of indigenous people is "The Block", an area of multiple significance. Not only does it have a long history as an urban concentration of indigenous residential occupation, but also of indigenous culture and assembly, already well established by the 1940s. It is undoubtedly the most important such site in the greater Sydney area.

The Block is also vitally important as probably the oldest piece of indigenous-owned urban land in Australia: the heritage registry says of the site "It was one of the first pieces of land in urban Australia owned by Indigenous people when it was purchased for Indigenous housing in 1973." This has been referred to by some as the first successful Aboriginal land rights story in Australia. As the indigenous owned area was gradually expanded through the Aboriginal Housing Company (AHC) to include most of the area bounded by Eveleigh, Vine, Louis and Caroline Streets, the Block has come to be regarded by many as the "Black heart of Australia", and has historically been a vital centre of movements for indigenous self-determination.

In the context of the Built-Environment Plan, the actions of the state government and the authority have been outrageous. In a move unprecedented in the area, specific floorspace ratios have been proposed which would effectively ban indigenous housing on the Block. These proposed ratios are out of step with others proposed in the area, and seem directed at preventing the reconstruction of indigenous oriented housing in the area. The apparently racist motivations of this policy, which would, if applied, effectively liquidate the Block as an indigenous area, are underscored by comments made by the responsible minister, Frank Sartor, when he demanded that Mick Mundine, the head of the AHC, get his "black arse" down to see him for talks. The complete lack of respect, and even basic sensitivity to the issues, underscores the approach taken by the Minister.

At a time when planning ratios for the rest of the area are being set to allow greater numbers of residents on government owned land, the Draft Built Environment Plan sets up the Block to have a smaller number of homes than is presently allowed, ensuring that housing of all sorts, let alone indigenous housing, will be marginal to the character of the new development. This contradiction further underlines the racism of the policy.

We call for the indigenous residents of the area to be free to determine the development plans for their land, exercising elementary self-determination, and for the RWA and the Minister to cease placing limitations that are completely out of step with planning controls for the rest of the area.

We recommend that:

- The current residential floor space ratio of 1:1 for the Block be retained.
- That the RWA allow the City of Sydney Council to determine any development application for the Block on its merits.
- That the RWA work with the AHC and the Indigenous community to ensure new Indigenous housing is constructed according to the wishes of Indigenous people.

## **Maintaining the Residential Nature of the Area**

The Greens do not support the proposed development of Redfern Railway Station, Gibbons St and Regent St into a mass commercial centre, 'the southern gate-way to the CBD'. The proposal is excessive, does not reflect the existing character of the local area and is counter-productive to good urban planning principles. There is a large number of new developments that have recently been completed, or are reaching completion in the City of Sydney.

We believe that the addition of a large-scale Redfern commercial zone would add to the already existing glut of commercial space in central Sydney. This commercial development would dramatically change the character of the area, place pressure on rents thus threatening affordable housing stocks and would likely lead to significant vacant space.

One of the central justifications for the development is its potential for delivering jobs, particularly for the many residents of the area who are either unemployed or underemployed. The RWA claims in its draft Employment and Enterprise Plan the development could create up to 18,000 jobs. This figure is simply a multiple of the commercial floor space potentially created by the plan. This does not represent a realistic jobs estimate as much of the floor space may not be occupied, and the jobs which are housed in the new commercial space may simply replace existing jobs elsewhere in the area. There is no guarantee that any new jobs will be created and no plan for how potential new jobs will be encouraged beyond simply providing vacant space. Finally, the types of jobs likely to be generated match closely existing jobs in the CBD. It is unlikely these jobs will be suitable for those currently excluded from the job market, but will more likely be filled by white collar workers, many from outside the area.

The proposal of large commercial buildings around Redfern Station is inappropriate to the existing land use and scale of the area, which is predominantly 2 storey retail/commercial buildings and newer residential development. It appears that the existing TNT Towers have been used as an acceptable precedent, when in fact they are an aberration that does not contribute to the physical character, amenity or safety of the surrounding area.

As an alternative to the RWA's proposal, The Greens wish the residential character of Redfern be maintained and enhanced. Redfern should continue to accommodate diverse communities, as previous suggestions for cooperative housing and the like have explored. We believe the state significant sites do provide a valuable opportunity for urban consolidation. By focusing on residential, rather than commercial development, we believe this consolidation can be accommodated in a manner more in keeping with the character of the area and the needs of the local community.

We believe that limited commercial development is appropriate, particularly street level shop fronts linking the station to Redfern and Regents Streets on the east and Abercrombie Street to the west, and as a limited component of larger mixed-use developments. We believe concentrated commercial development is more suited to other areas in the City of Sydney which do not currently house large residential communities.



We recommend that:

- The development not restrict residential floor space ratios, especially on the Eveleigh precinct (the Block).
- That the development provide for urban consolidation through residential development in keeping with the character of the area, rather than large scale commercial buildings.
- That commercial development focus on shop fronts linking existing commercial strips on Redfern, Regent and Abercrombie Streets to the station in Lawson Street.

## Heritage and Planning Issues

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 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 the 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 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 blocked by a ten storey building. Conversely the public prospect of our landmark building as well as the hill town character of Newtown from across North Eveleigh will disappear.

Linked to this key principle and a fallacious assumption underpinning the Draft Plan is the notion that height and density are linked. This need not necessarily be so. Some of the densest places on earth are low rise, including some very successful European and Asian urban centres. Conversely, some 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 but dense Darlinghurst.

The sites now being proposed for development are all embedded in densely built up inner suburbs, primarily nineteenth century architectural fabric. As these are precious, rare, highly valued, and valuable assets, virtually the whole area is a mosaic of Conservation Areas. The Redfern/Waterloo area includes a great many Heritage Items. The whole of the Eveleigh Railway complex is a Heritage Item. This means almost everything contributes to the areas heritage and these values must be conserved. Any new architectural inserts must be compatible with the existing building fabric – largely meaning compatible in scale and character. The current controls reflect this intent - protecting and enhancing existing 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. 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. 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.

A major criticism of this Plan is the use of gross FSR's to make them more palatable compared to existing ratios. The proposed new FSRs are much higher, some even double. It is unethical to differentiate the planning controls on the basis of land ownership, and it is particularly inimical to ramp up the densities and heights for public land with the primary intent of maximising land values. This is at odds with sound planning principles.

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 curtilages, open space, roads, and setbacks from abutting residential) mean that the ultimate net FSR of any developed portion of the site is likely to be about double the suggested gross figure – demonstrating the inappropriateness of what is proposed. It is absurd in this tight fine grained context to propose heights and densities considerably exceeding Green Square, Victoria Park, and even East Darling Harbour where there is evident scope for higher buildings in conjunction with a much more generous public infrastructure.

We recommend that:

- FSR and height ratios reflect the surrounding suburbs and be in keeping with the history of each area.
- That developments seek to build on and enhance the existing character of each area rather than dramatically transform areas.
- That all FSRs be confined to areas that are planned for commercial and residential development and exclude public open space, roads and streets. This of course requires that plans for open space be developed prior to the finalisation of the Built Environment Plan.

## **Public and Affordable Housing**

Low cost and affordable housing is fast disappearing in inner city Sydney. The outlines of the Redfern Waterloo development visible in the Draft Built Environment Plan and various public statements and cabinet leaks, suggest that the proposed development is likely to reduce affordable housing in the Redfern/Waterloo area at an even faster rate. Phase 2 of the Plan includes plans for public and affordable housing, yet the RWA has already made clear there is no intention to provide additional public housing.

Leaving planning for affordable housing until after consideration of the Built Environment Plan which sets the overarching planning framework, will result in affordable housing being tacked on as an afterthought, and ultimately lead to a significant decrease in affordable housing of all types.

The fact that housing needs have been given a lower priority than commercial and retail development has contributed to a feeling of uncertainty and concern among residents of the area. Despite public commitments to maintain public housing, the government has, as yet, been silent on the question of affordable housing. Existing public housing stock is already insufficient to cope with the demand, and the lack of clear plans to deal with the need for a larger stock of housing accessible to the socially marginalized is a major flaw in the existing plans.

The Government has been giving the community contradictory messages. Leaked Cabinet documents cited in the Sydney Morning Herald have shown plans to maximize the market value of developments in the area and a consequent reduction in public and/or affordable housing. Leaked Cabinet papers speak of the \$5 billion in potential private development. This will place a squeeze on accessible housing in absolute terms, and a dramatic fall of accessible housing as a proportion of the total housing stock in the area.

The Government's public commitment to public housing in the area is also at odds with leaked Government plans to sell two thirds of the Redfern Waterloo estate to private developers with an increase of 12,500 private tenants on this land alone. At a bare minimum, this would result in the total loss of publicly accessible green space to the residents of the housing estate, not to mention residents from the surrounding area. However, it may also set the stage for a subsequent partial or total liquidation of the public housing stock to further private development. In the Draft Plan as it stands, the Government aims to reduce the proportion of public housing to 17.5%. This is the opposite of what the community needs. The Greens believe we can not sensibly consider the Built Environment Plan without seeing the RWA's plans for public and affordable housing first.

It is critical we maintain affordable housing in the inner city. It is important for a range of reasons:

- A 20,000 increase in private tenants will place upward pressures on the price of remaining affordable accommodation. Already 69% of South Sydney residents are undergoing 'housing stress' (more than 30% of household income on rent). Rents for one bedroom units in South Sydney increased 35% from 1996-2002.
- Low income earners will be pushed further and further away from the city centre, job opportunities and social services. Already there are 100,000 people on Department of Housing waiting lists indicating a chronic shortage of subsidized housing – there is

- simply nowhere for Redfern Waterloo residents to locate to.
- Insufficient support for low income earners, relocation, exchange of open and community spaces to private concerns contributes to greater social dislocation and exacerbate social problems of the area.
  - The social mix of Redfern Waterloo contributes to the life and diversity of the inner city.

We recommend that:

- Clear targets for affordable housing be set prior to any private development and that these targets increase the available stock of affordable housing in the area.
- The RWA investigate mechanisms to support cooperative housing as a primary form of affordable housing in any new development. This may include tax concessions, access to cheap loans, assistance with securing accommodation, assistance with governance issues or the provision of accommodation as part of new private developments. Such schemes contribute to social cohesion and community strength.
- No public private partnerships for public housing – the community has learnt time and time again that such ventures divert government funding to corporate coffers.
- The RWA commit to increasing the absolute amount of public housing in the area as part of the redevelopment.

## **Financing Development and Land Sale**

The South Sydney Greens are concerned that the Draft Built Environment Plan signals an intent to privatise a significant stock of public land without adequately planning for future community needs. While the Draft Plan does not commit the Redfern Waterloo Authority (RWA) nor the NSW Government to the sale of land, when read in conjunction with other RWA and Government statements, this is the clear intent.

The Draft Plan establishes a development framework that will substantially increase the value of government owned land. We are concerned that the need to maximise revenue from land sale has overridden a more sustainable approach to development. Heritage, community amenity and environmental considerations appear to have been subjugated to financial imperatives. By maintaining land in government ownership, using mechanisms such as lease hold to allow private sector development, the government would retain the ability to provide services for other community uses in the future as the population increases and the demography changes. These options are made significantly more costly, and thus less politically possible, if the land is sold.

Currently the RWA derives its revenues from the development, sale and rental of government owned land. This revenue will be used to finance the operation of the RWA, to develop other government assets, such as Redfern train station, and will be reinvested more broadly in the community. The Greens reject this funding model, which requires the Redfern-Waterloo community to finance directly the operation of a bureaucracy and the upgrade of essential community facilities normally funded from other sources, such as the station. This funding model also creates a false urgency to convert land holdings into finance to repay Treasury loans. At the minimum this creates the impression that the Authority is rushing processes of community consultation and prioritising short term financial gains over longer term community needs.

The South Sydney Greens believes the Draft Built Environment Plan cannot be divorced from the broader legislative and funding context of the RWA. Thus we recommend:

- That the funding base of the RWA be changed to ensure that the administration of the Authority and the maintenance, and any necessary upgrade, of existing public facilities is financed out of consolidated revenue.
- That the RWA commit to retaining ownership of all government owned land.

## Open Space

One of the most disturbing aspects of the Built Environment Plan is its failure to provide a plan for public open space. Redfern has long been recognised as the most deficient inner suburb in terms of open space, about 5m<sup>2</sup>/capita. This compares with a norm of about 10m<sup>2</sup>/capita in most of the suburbs abutting the central City – and hence the standard adopted for open space in Pyrmont Ultimo. It is not only essential that, as a minimum, this rate be sustained, but that the provision be improved where public land is available, to rectify the existing 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 22m<sup>2</sup>/capita.

The effective doubling of the population of the suburbs within the RWA will result in an approximate halving of the per capita provision of open space. In addition to the lack of planning for public open space, the Draft Plan actually removes existing open space allowing for large scale commercial development on Marian Park, and the building upon open space at Redfern Public School. This is unacceptable.

Marian Park is an important community resource and creates an important visual break to the historically and culturally significant Watertower building. The park has an important place in the history of the area, with successive waves of residents fighting numerous battles, first to establish the space as a park and then to defend it. Over this time, Councils (both City of Sydney and South Sydney) have maintained the park and built facilities for park users. This is despite the land being owned by the State Government. The Draft Plan not only fails to acknowledge this history, as well as the debt the State Government owes the community, but also proposes to remove this vital public space currently enjoyed by the community. Residents of the affluent north shore or eastern suburbs would never tolerate their parklands being taken over for high rise development, and the government knows it. Why is Redfern being treated differently?

The Redfern School site is another important public space. The school has played an important role in the history and culture of the area and its closure was a blow to the community. As the population of the area is set to increase it is important that the site remain in community hands to provide for future needs. However, equally importantly, the large playground in the school offers an excellent opportunity for public space, something residents have expected prior to this Plan. Once contamination issues have been addressed, it is vital that the bulk of this area be available as public open space. The sale of the land to the Aboriginal Land Corporation need not spell the end for this vision. It is important that the zoning reflect the need to keep this land as open space, and that provision be made for public access to the site.

We recommend that:

- A plan for public open space be developed prior to the finalisation of the Draft Built Environment Plan.
- That the final Built Environment Plan allow for an increase in the ratio of public open space per person, using the City of Sydney average as a guide.
- That all of Marian Park, including the current car park on the railway end, be zoned open space, and that the RWA investigate the sale of the park to Council.
- That the bulk of the Redfern School playground be zoned open space and the RWA ensure public access to the site.

- That open space be provided away from arterial roads to to allow children to play in parks with minimal parental supervision.



## Transport

The Redfern area has a significantly lower car ownership and usage rate than the remainder of the Sydney metropolitan area, and a significantly higher use of both public transport and bikes. Redfern station is one of the major transport hubs for the train network, and the area is close to major bus routes. It is logical that any new development take advantage of these attributes and seek to increase bike, pedestrian and public transport usage at the expense of motor vehicles.

The redevelopment of the area, and significant increase in both residential and worker populations, cannot be considered without an integrated transport plan. The Draft Built Environment Plan does make some positive contribution by reinstating pedestrian (and now cycle) access across the railway lines. However, it also proposes a road tunnel under the railway lines to Wilson St that would significantly increase car traffic and endanger the highly utilised Wilson Street cycle way. It offers no plan for dealing with increased vehicle traffic, and no plan for prioritising cycle and pedestrian traffic.

Most disappointingly, the Plan offers no real solution to the physical divisions within the community caused by the railway lines and the traffic arteries of Gibbons and Regent Streets. The solution of a pedestrian and cycle bridge at the city end of the railway lines is encouraging but inadequate by itself. The proposal for a road tunnel under the railway lines is actively counter productive. The Draft Plan offers no suggestions for addressing Regent and Gibbons Streets, and thus provides no meaningful solution to the reconnection of Redfern Street and the station. Without a solution to this problem, the revitalisation of Redfern Street will be seriously compromised.

A first step in developing a comprehensive integrated transport plan is a pedestrian and bike plan for the area that allows passage over the railway lines at both ends of the North Eveleigh rail yards, safe passage across Regent and Gibbons Streets, connections to safe bike corridors north to the city and east to the beaches. This will facilitate better bike traffic through the area.

A second step must consider the internal mobility needs of the local community. Many of the residents of Waterloo and Redfern are unable to access public space, shopping and cultural facilities because of the lack of internal transport, as well as personal mobility limitations. Any transport plan must allow for internal transport for residents to all essential services and facilities, with the first priority of making Redfern station fully accessible.

Finally, it is important that new developments facilitate the transition to a less car dependant city. Strict limits should be placed on car parking for all developments. The RWA should seek to encourage car-free development around the station, and other development models that reduce car dependence, such as innovative car schemes on-site for larger developments.

We recommend that:

- A pedestrian and cycle plan be developed and incorporated into the Built Environment Plan before it is finalised.
- Pedestrian and cycle bridges be built at both ends of the North Eveleigh railyard, and in the middle of the site connecting to the new Arts complex.
- The proposed road tunnel under Wilson Street be scrapped.

- Light rail and Cat bus services be considered for providing internal transport within the area.
- Strict limits on car parking be applied to new developments, including car-free development near the station and the provision of car sharing onsite in larger developments.
- Traffic on Regent and Gibbons Streets be addressed, possibly by converting one-way streets into two-way streets.

## **Community Infrastructure**

The Draft Plan proposes the redevelopment of a number of public spaces and facilities, presumably to facilitate their sale and maximise land value. This includes the Rachel Forster Hospital, Court House, Police station, Redfern Public School, Marian Park and North Eveleigh Railyards sites. At the same time the Plan is part of a broader vision that will double the population of the area and significantly increase land values. Combined, this is a recipe for increasing needs for public infrastructure and decreasing provision. Yet there is no plan for the ongoing provision of public services.

The Greens oppose the sale of these assets and support proper planning to ensure that community needs are met. Current assets need to be retained – such as Redfern Court House (for which a need still exists) and Marian Park, which is used by the community as public open space. As Redfern Waterloo's population grows under the Plan, it is vital to provide for greater community needs. For example, Rachel Forster Hospital can provide for community health and aged care (both present and future) and Redfern Public School is available to service the need for an educational facility.

We recognise that some of these, and other, sites may require upgrading and/or partial redevelopment to enhance their ability to service community needs and to provide for ongoing economic sustainability. For example, the North Eveleigh railyards are not being fully used by the local community and are considered appropriate for alternative uses. In the case of such redevelopments, it is essential that the planning process begins with a comprehensive analysis of current and future community needs, and we believe the absence of such a study is one of the underlying flaws of the Draft Built Environment Plan.

The Greens support the adaptive reuse of sites that have been properly assessed and deemed surplus to requirements. This is how successful urban renewal and consolidation should operate. However, this can be achieved without the sale of government land, through leasing and through government owned provision of housing and other facilities. This would ensure public control of the sites into the future and maintain revenues from rents in public hands. It is a solution that maximises long term needs in the common interest, rather than short term revenue considerations.

The area is not currently served with adequate recreational facilities. There are limited sporting facilities for junior sports, especially netball. These needs must be considered before publicly owned land is sold or redeveloped.

We recommend that:

- Future planning be undertaken to assess community needs in the Redfern area and that provision be made for future health, aged care, educational, recreational and other needs.
- Ownership of publicly land be retained.