

## **Submission on 505 Wilson Street, Redfern - CME Building**

REDWatch was established to monitor such sites .....	1
REDWatch Concerns about this Exhibition.....	1
REDWatch supports Chief Mechanical Engineers (CME) Building being restored and used ..	2
Heritage Impact of the work proposed.....	3
Heritage Impact of possible uses.....	3
Heritage Impacts of the Paint Shop precinct on CME's vistas .....	5
Conclusion.....	5

### **REDWatch was established to monitor such sites**

This submission is made on behalf of REDWatch Incorporated (REDWatch). REDWatch was set up in 2004 with the following objects in its constitution:

*REDWatch is a group of community residents and friends from Redfern, Waterloo, Eveleigh and Darlington who support the existing diversity in these areas and wish to promote sustainable, responsible economic and social development.*

*REDWatch recognises the importance of the Aboriginal community to the area.*

*REDWatch has been formed to:*

1. *Monitor the activities of the Government (local, state and federal), the Redfern Waterloo Authority, and any other government instrumentality with responsibility for the Redfern, Waterloo, Darlington and Eveleigh area, to ensure that:*
  - (a) *The strategy benefits a diverse community*
  - (b) *Communication and consultation is comprehensive and responsive*
  - (c) *Pressure is maintained on authorities*
2. *Provide a mechanism for discussion and action on community issues.*
3. *Enhance communication between community groups and encourage broad community participation.*

*This may involve: Holding regular meetings; Holding community forums and other events; Establishing a website; Communicating with the community through other means; Meeting with government representatives and authorities; Cooperating with other community organisations; And any other means the association deems appropriate.*

REDWatch makes this submission on the Chief Mechanical Engineers (CME) Building SSDA in line with these objects.

REDWatch welcomes the opportunity to comment upon this planning proposal.

### **REDWatch concerns about this exhibition**

Given that this exhibition is about the impact of work on a state heritage listed, it was of major concern that the Conservation Management Plan (CMP) for the CME's building, which the EIS says was prepared in 2022 has not been placed on exhibition with the other documents.

Instead we had a Statement of Heritage Impact, as well as an Aboriginal Heritage Due Diligence and a Historical Archaeological Assessment. Appendix B of the Statement of Heritage Impact, has a table assessment against the CME's CMP Policies but the CMP itself was not released.

"Conservation management plans outline what is significant about a place and how to manage changes over time to ensure the significance is retained." DPE Heritage NSW Conservation management plans webpage.

In line with DPE Heritage NSW, the first policy referenced in the CME CMP Policy assessment section for the CME building from the CMP states: *"The present CMP should be used as the principal document to guide the conservation and management of the CME Building. This CMP should be adopted by TAHE and TfNSW"*.

REDWatch hence approached Transport for NSW (TfNSW) to request the release of the CME CMP for this exhibition. REDWatch was advised that the SEAR's did not require the release of the CMP but that TfNSW were prepared to place the CMP on the exhibition website if DPE agreed.

On the day before the exhibition closed the CMP and its addendums (some 986 pages) appeared on the exhibition website. REDWatch thanks TfNSW for releasing the CMP and making it public in line with the Heritage Office's best practice. REDWatch notes however that the draft release had been edited in the intervening time, indicating that the CMP was not ready for exhibition at the commencement of the exhibition.

After the CMP appeared, REDWatch approached DPE to seek an extension and was advised that it was not possible to keep the portal open but that a week's extension would be granted given the new material had only just been added to the exhibition. REDWatch welcomes that extension and has used it for this submission.

REDWatch remains of the view however that the CMP was a pivotal document of the exhibition and should have been released at the start of the exhibition. REDWatch is also of the view that people making submissions were deprived of key information about the "principal document" that is to guide the SSDA work on the CME building.

If the SEARs did not require the release of the CMP for work on a state heritage listed item then DPE need to look at the new SEARs process and ensure that this requirement is specifically included in future SEARs for heritage listed buildings and precincts containing such buildings.

Irrespective of the SEAR's requirement, TfNSW could have, and should have, released the CMP documents as an appendix to the Statement of Heritage Impact. To not do so deprived those making a submission of access to all the information relevant to the exhibition.

If the CMP was not ready for exhibition then the exhibition should have been delayed until it was ready for exhibition.

In a well-functioning planning system, the late release of such a key document should have restarted the clock on the exhibition or required a re-exhibition.

For the reasons above, REDWatch is of the view that the exhibition is tainted and submissions made may not give an informed view on the proposal.

REDWatch, as a voluntary community organisation, has not had time in the week granted to us as an extension, to read all the additional documents and to seek advice on them from our members and those with heritage expertise.

## REDWatch supports Chief Mechanical Engineers (CME) Building being restored and used

Like the Paint Shop and Clothing Store Precincts in North Eveleigh, the CME is now owned by Transport Asset Holding Entity NSW (TAHE) and managed by Transport Heritage NSW (TfNSW). It has however sat in limbo and been allowed to decay since the buildings use has been wound down and it ceased being used in the early 2000's.

When the Redfern Waterloo Authority (RWA) was put in place in late 2004, REDWatch argued that the CME Building should be restored and bought to use. The RWA took the view that the “loss” it would make on renovating the CME building would be better covered by a buyer for the North Eveleigh site discounting their offer for the site to cover the cost of the work on the CME building.

As a result of this decision the State Significant CME building continued to deteriorate. The work by Urban Growth addressed the outside appearance of the building but did little to stop the internal deterioration of the building.

REDWatch hence supports TfNSW initiative to restore the building and to bring it to a modern use. REDWatch recognises that the best way of preserving this building into the future is for it to be used and properly maintained in accordance with the CMP and statutory heritage obligations.

## Unable to assess the heritage impact of the work proposed

Given the heritage importance of this building, which are spelt out in the CMP, there is a need to carefully manage the trade-off between the work needed to make the building comply with current day requirements and for potential future uses.

The Development Application on exhibition proposes restoration of the building and alterations to make it suitable for current day use. Proposed works comprise new internal walls, doors, a lift, amenities, windows and new balustrades. Landscaping is proposed to improve the curtilage around the CME building and ensure the building is more accessible while retaining all trees on the site. New in-ground services including a new stormwater system and new sewer connection are also proposed.

The questions for this exhibition relate to the trade-off between the original heritage values of this important heritage item and what is considered necessary to make it suitable for reuse. It’s about the appropriateness of the adaptive reuse and if Burra Charter conservation principles have been applied.

REDWatch does not have the expertise, especially within the week available for comment, to be able to assess if the work proposed is all necessary to bring the building to modern day use and if the heritage trade-offs in this work are all necessary.

REDWatch notes the detailed analysis of the building room by room and the opportunity for the removal of intrusive elements including partitioning. It welcomes the removal of these elements. REDWatch encourages TfNSW to work for good heritage interpretation out comes first and then to find complimentary uses rather than let possible uses drive the SSDA refurbishment work.

## Concern about possible post SSDA uses impact on heritage

REDWatch’s main concern around this proposal is around the interaction between the potential uses of this building and heritage access.

REDWatch notes that the potential uses may require a separate DA but assumes that a continuation of the historical use as an office would not. REDWatch also note the Overarching CMP observation that “best heritage practice seeks alternate uses that are related to the original use of a place.”

REDWatch submits that if the new office use is by someone other than a NSW Government body that “the use” is significantly different from its historical use and a use DA should be required.

If this is not to be the case then, as with Locomotive Workshop SSDA, REDWatch requests this SSDA application to deal with the potential risk for commercial uses to trump heritage uses of the site.

REDWatch notes according to the CMP (page 86) that TfNSW is seeking specialist advice to prepare the Chief Mechanical Engineers (CME) Building in Wilson Street for sale for commercial use. The move from Government ownership to private ownership has significant heritage implications. As an example the Section 170 register requirements do not automatically transfer to a private purchaser.

On the sale of the former Australian Technology Park, UrbanGrowth NSW introduced a range of easements and positive covenants to ensure public access and access to heritage items. The

purchaser was required to maintain a S170 register and maintain it in the same manner as it would if the items were still held by a government entity. Provisions should be put in place to ensure that if the site is sold that there is no loss of heritage protection.

In the SSDA for the Locomotive Workshop, the operation of the heritage blacksmiths as a use was recognised and protected 24/7 by the SSDA conditions. REDWatch would like to see heritage protections also included in the CME Building approval to ensure that the recommendations of the CME CMP for public access are upheld irrespective of the use of the CME building.

In particular REDWatch would like to see the SSDA specify, in line with the CMP constraint on page 187, "that the CME Building is to be open to the public for a specific number of heritage dates or during key heritage events". REDWatch would suggest 4 such open opportunities per year for tours of the entire building. The potential times for such access could align with periods during History or Heritage week for guided tours.

There is a balance to be struck between use of the building and making such an important State Heritage item open to the public at least some times during the year so the heritage can be enjoyed. The CMP talks about this access as a constraint and suggests it be done in a lease to the occupant (page 187). REDWatch would prefer this to be specified in the SSDA so it has less chance of being lost and the public good is safeguarded.

Ideally such an important building should include uses that allow some normal access to the public. The use by a heritage organisation, a heritage book shop or similar that could mix its business with the heritage buildings would be ideal and allow some access to the building.

The CMP references the heritage tourism possibilities being explored at South Eveleigh and the CMP would be an ideal add on, if at least a part of the building was accessible on a day to day basis to the public. Page 199 of the CMP notes: "The ERW precinct, including the CME Building, is perfectly positioned to implement meaningful and engaging interpretation and cultural heritage tourism initiatives that link both North and South Eveleigh more broadly, and beyond, including the interpretation of the overall ERW precinct within the context of Redfern Railway Station".

For a long time there has been a community request for a heritage office within the ERW where historical records could be accessed and materials collected by ex-workers and their families deposited. A small part of the CME building would be ideal for such a use. This could be part of the contribution of the new occupant.

Given the size of the building it is not likely a complimentary use that would allow access to the entire building would be found, hence the CMP suggestion that the building should be accessible for heritage events and tour on a limited basis.

The importance of the building is in the interior and not just the exterior and "key interest groups with a strong connection to the ERW, including the local community, Redwatch and interest groups, such as the local Aboriginal community, former workers, unionists, engineers, historians, architects and train enthusiasts" (CMP 187) must have guaranteed opportunities to view the interior and not just the exterior.

Heritage interpretation within the CME building is also linked to access to the building. Internal heritage interpretation can provide a nice work backdrop but it is useless to the community and stakeholders if they cannot access and view the interpretation. Heritage interpretation needs to focus on areas that can be accessed by public visitors to the site not just those that work there and visit them.

As the CMP states: "There is the need to carefully balance any redevelopment offsets utilised to fund, conserve and maintain use at heritage sites, such as the CME Building Subject Site into the future with community expectations for a level of accessibility, conservation of core heritage values, opportunities for involvement in meaningful consultation about future site uses and outcomes" (page 188).

## Heritage Impacts of the Paint Shop precinct on CME's vistas

REDWatch notes in the CMP that vistas from the CMP building across the rest of the ERW are considered historically very important (Section 7.2.6. Views and Viewscapes page 188-9) and need to be protected.

REDWatch notes that the bulky building in the recently approved rezoning of the Paint Shop precinct will make it virtually impossible for there to be any remaining vistas to South Eveleigh's key buildings from the CME building. REDWatch notes that these are building envelopes and hence encourages TfNSW and TAHE to work with the developers of these sites to try and maintain as much as possible of the CMP heritage vistas.

REDWatch notes that in the Waterloo South Development rezoning, Council proposed, gaps within high rise buildings for wind mitigation. REDWatch notes that such an approach would also allow for the retention of some of the CME vistas if sympathetically designed. Wind is likely to also be something that will need to be mitigated in the building designs in the Paint Shop precinct also.

## Conclusion

REDWatch has major concerns about the process of this exhibition arising from the late release of the CMP as the key document to guide any work on the CME building. The lack of time to consider the CMP and the inability of many to have access to the information it contained taints this exhibition.

While REDWatch welcomed the extension of time to make a submission, but only had a weeks to alert the community to the release of the CMP, solicit feedback and to prepare our submission. REDWatch was unable to this within the short period allowed.

As a result this submission is limited as is not as comprehensive as it would have liked.

REDWatch supports the CME building's restoration and upgrade to meet current building requirements.

REDWatch is unable to say if the work proposed is all necessary to bring the building to use or if it meets the requirements of the Burra Charter and the requirements of the CMP.

REDWatch is concerned however to ensure that heritage protections and community access to the building is preserved and guaranteed.

REDWatch is concerned about the potential sale of the building and wants to see heritage protections in place that provide a similar level of protection to that which would be obliged if the building and its contents continued to be under Government ownership. In particular REDWatch flags the need for a mechanism to insure Section 170 obligations pass to any new owner.

REDWatch is concerned about the new proposed use trumping heritage values and community access. Commercial uses of the building should be sympathetic to heritage access. Heritage access to the entire building should be guaranteed for guided tours during heritage and history week.

REDWatch encouraged DPE to embed access and preservation of heritage obligations within the SSDA approval.

REDWatch notes the potential impact of the Paint Shop Precinct redevelopment on the important CMP vistas across the former Eveleigh Railway Workshops and requests that the CME CMP observations about CME sightlines and vistas be given a high priority in the future design of Paint Shop Precinct buildings.

REDWatch appreciates the opportunity to comment on this planning proposal and trusts that our comments and those of community members will be given a weight equal to government stakeholders.

Thank you for the opportunity to comment on this proposal

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*REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area originally covered by the Redfern Waterloo Authority). REDWatch monitors government activities in the area and seeks to ensure community involvement in all decisions made about the area. More details can be found at [www.redwatch.org.au](http://www.redwatch.org.au).*