

Re Exhibition of SSD 15 7317 for Australian Technology Park (ATP)

I write to raise objections to the above development application on behalf of REDWatch the community group monitoring the suburbs of Redfern, Eveleigh, Darlington and Waterloo (REDW). A range of issues have been raised with us by our members and community members regarding this development which falls within our area.

We wish to raise these issues for your assessment of the above proposal in line with the provisions of 79C of the Environment Planning and Assessment Act 1979.

Response to variations to the planning controls requested by the proponent

We note that the development contains requests for variations to Development Standards for both GFA and height under SEPP No1. These applications recognise the non-conformity of the development application to the planning controls for the site and hence they are seeking variations. REDWatch objects to these breaches of the controls and seeks that the SEPP No 1 variations not be granted.

There was considerable community insistence that the sale of the ATP site needed to ensure development consistent with the existing planning controls. The community was advised by UrbanGrowth that the sale of the ATP site was to be consistent with the State Environment Planning Policy (Major Development) 2005. We are unable to assess at this time if the application breaches the sale agreement or if the wording of the agreement is such that SEPP No 1 variations are permissible. What we are sure of is that the variations applied for are not consistent with what the community was told in 2015 would be permissible on the site.

- i) Opposition to height variation on Building 1 – The proponent requests a height variation in the proximity of the existing Alexandria child care centre which the proponent's land directly abuts. The planning height controls step down towards the pre-school and the adjacent residential area. The extra height sought is in close proximity to the pre-existing childcare facility and the variation will directly adversely impact upon the childcare centre and its solar access.

REDWatch submits that the current planning controls exist, albeit somewhat imperfectly, to protect the child care centre and hence the variation should not be allowed. REDWatch also notes in the next section that the height breach is also associated with an over allocation of GFA to the site. The extra GFA should be removed from the area subject to the height breach.

REDWatch further submits that as the proposed development will overlook the childcare centre that the consent authority should condition any approval for screening on the proposed development to ensure the privacy of the children attending and using the pre-school from those working in the CBA building.

- ii) Opposition to cumulative GFA variation across the development – The proponent has requested approval for a 4.86% increase in floor space across the entire redevelopment. This increase is against the undertakings given to the community that the purchaser of the site would need to develop within the existing controls. The proponent's argument that the controls are "nearly 10 years old ... and did not anticipate the development needs of the CBA" (p6) is hubris given that Mirvac have recently acquired his site specifically for the CBA buildings have not yet completed settlement. The site has been purchased in a public process where the limitations of the site and the requirement to comply with the existing planning controls as a condition of sale was known by the proponent.

The argument that UrbanGrowth Development Corporation "endorsed" Mirvac's proposal for the site and it was subsequently sold to them does not mean that UrbanGrowth specifically approved a 4.86% greater yield for the development over the controls that UrbanGrowth said purchasers needed to develop within.

It seems more likely that the proponent's argument that this is a minor variation (less than 5%) is the basis of the application rather than a serious addressing of the SEPP No 1 requirements.

The SEPP No 1 GFA variation application deals primarily with the floor space for the entire site whereas the controls specify individual GFAs for each of the three blocks being developed. The total GFA increase of 4,980sm (4.86%) is made up of a 14,688 sm (35%) increase on Building 2, a 2,832sm (6.4%) increase on Building 1 and a GFA decrease of 12,539sm (-76.2%) on the

“community building”.

The increase on Building 1 helps to contribute to the height variation request to place a higher building into the 4 storey zoned area near the pre-school. REDWatch opposes this extra floor space and requests it be removed from the area where building 1 exceeds the planning controls.

REDWatch is also very concerned about 35% GFA increase in Building 2 and opposes this increase. The proponent has chosen not to use the height allowable of 9 and 11 storeys on the site but rather to make the floor plates cover almost all the available site and then to increase the floor space by in excess of 1/3 again to achieve 7 storeys across the site. This approach results in the greatest possible hiding of the heritage Locomotive Workshops and destroys any possible vistas of the heritage site that would be possible from a lesser footprint.

For example, removing around a quarter of the proposed building land coverage in Building 2 that results from the relocation floorspace to the site, could be used to open up the vista of the Locomotive Workshops from between Channel 7 and Building 2. It could also be used to increase the separation between the Locomotive Workshop and building 2 or opening up of the view of the Locomotive Workshops from the walkway between the Biomed Building and Innovation Plaza. This could be done by removing the tapering along this walkway and would be further improved if the tapering created the shortest side to the north rather than the south.

We appreciate that if the extra GFA is not dispersed on Buildings 1 and 2 then it will need to come back to the so called “community building” making it higher but still within the existing controls. We say “so called” as we are not convinced that this building is a broad community building as it appears to be more of an amenities building for the ATP tenants rather than a building that specifically responds to community needs. The titling of the building seems designed to indicate the development is making a community contribution when this is not necessarily the case.

REDWatch proposes this building either be renamed or that there be a genuine discussion with the local community about what facilities they would like to see in their “community building”.

In summary REDWatch opposes the SEPP No1 variations for height and GFA on Building 1 and we oppose the 4.86% increase of GFA as it is against the spirit of the EOI sales process for the purchaser of the site to develop the site in line with the existing planning controls. REDWatch is also concerned about the impact of the relocation of site GFAs within the development which we see as negatively impacting on the existing Alexandria childcare centre and the heritage listed Locomotive Workshops.

Response to proponents proposal on Redfern Waterloo Contributions Plan

REDWatch has concerns about the Mirvac proposal to make a contribution towards the provision of public facilities in lieu of making a contribution under the Redfern Waterloo Contributions Plan. While Mirvac's proposal has merit it also contains a significant conflict of interest which needs to be managed.

REDWatch proposes that the 2% contribution be allocated against public facilities as jointly agreed between the proponent, UrbanGrowth Development Corporation and the City of Sydney Council.

The proponent retains control and responsibility for the public domain and public access routes throughout the site. This public access is protected via a subdivision and a covenant entered into at community insistence with the privatisation of the ATP. Mirvac have elected not to pass control of the public domain to the City of Sydney Council. The ATP public domain is seen as integral to Mirvac's development and the atmosphere they wish to provide to their clients for those that work at the ATP. This is reflected in the significant investment above the contribution plan amount they propose to invest in the public domain.

The proponent however has elected to undertake significant site coverage rather than lessen the footprint and create additional public spaces. As a result, the external amenity that the proponent seeks for their development is highly dependent on the use of the public space for providing some of the amenity their development is seeking.

The provision of amenity for those who work in a campus style development may not align with the needs of the surrounding community that may move through the site or use it for recreational purposes. There needs to be input from Council which represents the surrounding community and UGDC which administers the fund holding the contribution plan funds.

This should be required in a condition of consent. A condition of consent should also require Mirvac to hold a public consultation on what the surrounding community wants to see provided with the contribution plan funds.

Examples of where there may be differences on amenities include: It has been suggested that near Henderson Road would be a good location for a community noticeboard / pole – this is likely to be of interest to the Alexandria community who move through the site but is not mentioned in the list of public benefits proposed to be funded with the contribution; Not listed also are public toilets which is not an issue for those working on the site who can access on facilities within access controlled buildings; The community may prefer facilities in the vicinity of the oval and the path to Innovation Plaza where the developer may prefer the facilities in proximity to their retail outlets.

Response to Heritage Impact Assessment and heritage issues

REDWatch has major concerns about the adequacy of the Heritage Impact Statement which provides the basis to possible heritage interpretation of the site. The HIS draws predominantly on the ATP's Conservation Management Plan (CMP). This leads to a concentration on the buildings and the moveable heritage and totally downplays the social history and significance of the Eveleigh Railway Workshop site.

The HIS admits this shortcoming in relation to the Aboriginal aspect of the study when it states in its limitations that: "The report includes an assessment of the potential for the site to impact on Aboriginal archaeological objects and/or places but does not include an assessment of the potential Aboriginal Cultural Heritage significance (intangible values) of the site".

The omission of cultural heritage significance is a major concern for REDWatch as the Eveleigh Railway Workshops were extremely important to the Aboriginal Community in terms of employment but also in terms of the struggle for Aboriginal rights. The concentration of the HIS on the Conservation Management Plan with its focus on the physical heritage buildings and the movable collection misses the on-going cultural importance of the site to the Aboriginal Community.

But it is not just the Aboriginal community who has their cultural heritage significance missed, it is the whole social history of the site. The worker's stories, the participation of the site on the social and political struggles of the time. This is the stuff of heritage interpretation not just the buildings and equipment collections.

Much work has been done on the by Prof Lucy Taksa and more recently by the ATP and UrbanGrowth. These stories are what brings the place alive in heritage interpretation terms and they are not covered in this skimpy HIA – you get no sense of why this site has a state significant heritage listing and what this means for how the site should be interpreted.

REDWatch recommends that Mirvac undertakes work on the cultural, social and political significance of the site and reflects these stories in the interpretation of the site.

Apart from some general suggestions that heritage items could be used in the public domain there is no proposal for heritage interpretation. How for example will the location of the Foundry be interpreted both in the public space around building 2 and within it. What items exist in the movable collection that could be used to do this interpretation. Is it possible to retain some of the heritage wall – or reinstate part of it as an interpretive element within or near building 2.

While there is some attention given to the Foundry there are also interpretative opportunities for acknowledging and interpreting the buildings that sat around the Foundry: The Pattern shop, Olivers Shop, The Wheel Shop, the Coppersmiths, the Tin Smiths, Welders, Plumbers, potash cleaning and the nurses station. Within the Foundry you had sections for Iron, Steel and Brass that could be interpreted. All these physical locations lend themselves to interpretation of the site, the trades, the processes and the stories.

Building 1 and surrounds should be used to interpret the activities of the Alexandria Goods yards that occupied part of that site.

Mirvac should undertake an investigation of what movable assets they hold that relate to buildings and processes that could be used for interpretation of the former site and how these can be incorporated into the new buildings with heritage access permitted.

REDWatch proposes that a condition be attached to any approval that the proponent undertake a report on the cultural significance of the site to those that worked at the site, including but not limited to, the Aboriginal community and that this work be used to deliver a heritage interpretation across the development that recognises the site's huge social and historical significance.

We note that the EIS states that "A Heritage Interpretation Strategy for the ATP site is presently being prepared in accordance with the NSW Heritage Manual and the OEH's Heritage Interpretation Policy". Such a policy is imperative in delivering the best possible heritage interpretation of the site. It should have been prepared before this application was submitted. Mirvac should consult closely with heritage professionals familiar with the heritage of the site, especially the social heritage, in preparing their interpretation plan. This interpretation plan must also be consistent with an updated heritage interpretation plan that covers the entirety of the former Eveleigh Railway Workshops.

REDWatch supports the Redfern Waterloo Heritage taskforce recommendation that there be a heritage reference group that operates across the whole of the site to ensure consistent heritage interpretation. The City of Sydney Council supports this position and has written to the minister of planning about the re-establishment of such a mechanism. When the local state MP Jenny Leong recently arranged a tour of the site for the Minister for Heritage this need was strongly taken up with the Minister as was the need for a repository for worker's stories and items of social and cultural significance.

REDWatch urges Mirvac to develop their heritage interpretation plan, including for this development in the context of the entire site and with input from heritage specialists and community members who had a special interest in the whole site and its consistent integrated interpretation. We encourage the consent authority to require the heritage interpretation to be done in the broader Eveleigh railway context and with adequate opportunities for input from all interested parties.

Finally, on heritage, REDWatch is concerned about the proximity of Building 2 to existing heritage uses in the Blacksmith's Shop in Bays 1 & 2 South. This section of Building 2 should be adequately soundproofed to ensure that those using Building 2 are not impacted by the noise that comes from this heritage precinct. It should be a condition of consent that noise and smells from the existing Blacksmith Shop are from an existing approved use and that any complaints about noise and smells from Bays 1 & 2 must be remedied by alterations to Building 2 and not by the closure or modification of the use of the Blacksmith' Shop within the Locomotive Workshops.

Transport, traffic and infrastructure

REDWatch members have a variety of views on the parking level on the site, some wish to see more, some remaining at the same level and some seeing it reduced further. What everyone is in agreement on is that they do not want to see a repeat of what happened during the Channel 7 development and initial occupation where tradespeople and then tenants parked in the local streets and ugly situations developed.

REDWatch requests as conditions of consent, if granted, that:

- 1) Mirvac has in place a mechanism during the development that will ensure that adequate onsite parking is provided during construction for all tradespeople and workers on the site as well as a Green Travel Plan for other workers / contractors not required to bring their own tools to the job.
- 2) That Mirvac and its tenant CBA be required to have in place a Green Travel Plan that deals with the initial move to the site and that encourages ongoing use of public transport, walking, bike riding and care sharing

REDWatch has been requesting from UrbanGrowth and City of Sydney Council a South Sydney traffic study taking in the wider Green Square, Alexandria, Erskineville area. Currently traffic studies like for this project are not assessing their contribution to the cumulative impact of all the development in the surrounding area. They are simply assessing their contribution to the existing road network allowing for growth trends which do not capture the impacts of other major developments in the area. WestConnex and significant surrounding developments will drastically change the ability of the road system to handle even modest growth from developments like ATP.

REDWatch continues to request that large developments not be individually approved without their contribution being assessed as part of the cumulative impact of all the large developments throughout South Sydney. In the absence of proper strategic planning and the proper assessment of infrastructure needs to support development, REDWatch argues that individual proponents need to undertake a regional traffic study to properly assesses their role in a regional cumulative impact. This traffic study does not undertake this wider assessment and hence in our view is inadequate.

This approach to the need for cumulative assessment also applies to rail and Redfern Station. Currently Redfern Station cannot cope with existing passenger loads safely – it cannot clear the station within the normal rail safety requirements. The Western Line is already well over capacity. Prior to CBA bringing the best part of 10,000 extra people through Redfern Station it is imperative that the government upgrade the station and provide proper access otherwise there will be many more people added to the current overload.

It is also imperative that the work proposed by UrbanGrowth for an access at the ATP end of the station be in place prior to CBA occupation at the ATP. If we were talking about an integrated development, we would be proposing that occupancy be dependent on completion of upgraded Redfern Station access. Given past delays in delivering an upgrade to Redfern Station we fear that CBA staff will not have a good public transport experience at Redfern Station.

Conclusion

There have been a broad range of concerns raised with REDWatch by the community. Here we have focused on the main ones we consider relevant to the assessment.

This process has been rushed in part due the number of redevelopment issues that have arisen in our area over the last couple of months which has meant that we have not been able to spend the time on this submission that we would have liked.

We trust that the issues we have raised will be taken into account in the assessment of this project under the EP&A Act.

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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.