

RTBU NSW RETIRED
MEMBERS ASSOCIATION
SUBMISSION: HERITAGE
IMPACT STATEMENT – ATP
REDEVELOPMENT

*Submitted
February 29, 2016*

Executive Summary

The Rail, Tram and Bus Union NSW Branch Retired Members Association (RMA) submits that the Mirvac EIS of which the HIS forms an important component should be rejected or stayed due to the comprehensive failure of the HIS to address the framework set out in the Public Covenant forming part of the conditions for sale of the Australian Technology Park and the October 2015 Secretary Generals Assessment Requirements issued for the Redevelopment (SEARs) of ATP.

Specifically the HIS does not comply with the policies of the ATP Conservation Management Plan(CMP) ,does not demonstrate how the proposal will achieve the collective management of heritage significant assets of the ATP precinct and does not comply with the objectives of the draft Heritage Covenant ,heritage asset management strategy.

The CMP is the principal conservation document for the ATP and provides the guiding conservation policies for the ATP site. The CMP was finalised in December 2013 after an exhaustive 3 and a half year development process. It built upon a 1996 CMP and a draft 2002 CMP.

The RMA is concerned that the HIS is a high level document, contains many sweeping generalisations not backed by evidence, is contradictory, negative, fails to grasp opportunities, avoids timelines and specific commitments, contains no financial analysis and project plans and refuses to accept or commit to consultation with key stakeholders.

The HIS fails to successfully address the details of the following key principles of the CMP.

1. The binary nature of the Eveleigh Precinct which includes the EWS and North Eveleigh precinct, the relationships with other railway participants including RailCorp who own the adjacent Large Erecting Shop and other railway industry participants. The RMA in analysing these relationships and issues such as the pedestrian/bike pathway between the two Eveleigh's suggests that the private sector will not be able to address these issues as they straddle competing private interests, fail to address public interest and that a new governance model overseen by the Government will be required.
2. Labour, aboriginal and community history.
3. The future of the Machinery collection/moveable heritage with the only announcement being negative: that it was not compulsory to adopt a reuse of the machinery collection. The CMP recognises this is a complex area in which resources will need to be marshalled to formulate a comprehensive collective solution welded by all stakeholders.
4. No comparative analysis is undertaken of other railway workshops and other contemporary adaptive reuse.
5. Community consultation including key stakeholders
6. Constraints and Opportunities arising from significance and form, condition and integrity
7. NSW Heritage Assessment Guidelines and the Burra Charter
8. Opportunities arising from the analysis of constraints
9. The management of the ATP in relation to custodianship of a major public asset, the engagement with workers, both past and present ,local people, the wider community and the presentation of the old and new Eveleigh/ATP stories in an engaging way both on and off site.

The RMA has analysed in detail HIS *Appendix 1: Summary of Development against Heritage Policies for the ATP site and made a number of recommendations.*

Background

In October 2015 the NSW Government announced that following a tender process Mirvac one of Australia's largest property developers had been the successful tenderer for the ATP with a bid of \$263m. Major features of the Mirvac ASX announcement included:

- An agreement with the Commonwealth Bank for leasing 93,000 sq. metres of office space including 3000 sq. metres for amenity(this will involve the relocation of 10,000 existing CBA employees from Parramatta to the ATP site)
- Centuria Property Funds acquiring 3 of the existing assets from Urban Growth including the International Business Centre (ex workshop manager's office)
- The establishment of the Mirvac Locomotive Trust (a sub trust of Mirvac Ltd) acquiring a freehold interest in the existing Locomotive Workshop and the National Innovation Centre(new locomotive workshops)

The ATP sale is part of a wider transformation of the former Eveleigh Workshop precinct which includes the North Eveleigh redevelopment and the Central to Eveleigh Corridor redevelopment.

Investigations reveal the Mirvac has had limited exposure to heritage buildings including the heritage listed tram shed at Glebe and the heritage listed Scarba House in Bondi. The Mirvac press release concerning their successful tender announcement did not refer to the heritage nature of the ATP precinct. An examination of the latest Mirvac Annual Report and the Mirvac 2015 *Sustainability Report: Stories of Change* contains no reference to heritage issues.

As part of the sale the Mirvac consortium is bound by a public positive covenant that relates to heritage and applies to the ATP site. The Covenant says the new owner "must

1. Comply with all obligations by virtue of S 170 and S 170 A of the Heritage Act, 1977
2. Comply with the Australian Technology Park heritage documents namely
 - a. Conservation Management Plan 2014-2019
 - b. Heritage Asset Management Strategy 2013 -2018
 - c. Moveable Collection Management Plan 2015 -2020

All or any variations, modifications, deletions or additions to any of these documents must be endorsed by the Heritage Council of NSW (this extends to the Minister administering the Heritage Act 1977 as amended.) and that all heritage documents must be updated and endorsed within 5 years of the date of the previous endorsement.

NSW Government requirements concerning an EIS and Heritage Impact Statement for Mirvac's redevelopment of ATP

On 29 October 2015 the Secretary's General Assessment Requirements (*SEARS*) were issued to Mirvac. The specific heritage requirements for the EIS were identified in sub section 7 in the following terms:

"The EIS shall include a Heritage Impact Statement that:

- *Addresses the impacts of the proposal on the heritage significance of the ATP precinct*
- *Addresses how the proposal complies with the policies of the ATP CMP endorsed by the Heritage Council of NSW*
- *Assess the impact on any Aboriginal and non-aboriginal archaeology within the ATP precinct and outline any proposed management and conservation measures to protect and preserve archaeology; and;*
- *Demonstrates how the proposal will achieve collective management of heritage significant assets of the ATP precinct and complies with the objectives of the draft Heritage Covenant Asset Management strategy and s170 Register.*

The Mirvac HIS argues “as part of the SSD approval processes applicants are not required to obtain separate heritage statutory approvals...”¹

Heritage Significance

The key document for heritage conservation referred to in the Public Covenant and the Mirvac HIS is the ATP Conservation Management Plan (CMP)². The RTBU RMA argues that the Mirvac HIS is selective, generalised and ignores a raft of specific proposals in its analysis of the CMP.

This is detailed in the RTBU RMA examination, dissection and analysis of Appendix A of the Mirvac HIS.

The major issues contained in the CMP include:

Executive summary:

1. A Conservation Vision statement that provides an overriding direction and vision for the conservation management of the ATP site. The RTBU RMA argues that the Mirvac HIS substantially deviates from this direction and vision.

2. While retaining links with the past with the past and social value to former workers, ATP also has strong connections with the current community of workers, residents and visitors. The RTBU RMA argues that the Mirvac HIS attempts to excise links with former workers and significantly underplay or ignore the social value of the site to former workers. In the HIS there is no plan by Mirvac to build connections with future workers, current workers, residents and visitors.

3. That ATP will be managed to:

- *Engage with workers past and present and the wider community.* The HIS makes no reference to the management.
- *Present the old and new Eveleigh ATP stories in an engaging way- both on and off site.* The HIS, despite numerous ways to do this as outlined in a number of areas of the CMP, falls into a combination of meaningless generalisation and/or severely limited examples of how this may be done.

¹ Heritage Impact Statement ATP Redevelopment: Prepared for Mirvac by Curio Projects, December 2015

² Australian Technology Park, Conservation Management Plan: Godden, Mackay, Logan: December 2013

- *Custodianship*: all heritage management actions and decisions will comply with ATPSLs constitution, relevant legislation, the Burra Charter, the policies of the ATP CMP and NSW Government policy as appropriate. An examination of the CMP reveals that heritage was deeply ingrained in the ATPSL culture. How Mirvac establishes an equivalent culture remains the task for the future.
- *Engagement* “interested people, including current or former workers, residents, special interest groups and the wider public will be encouraged to connect will ATP on and offsite. Engagement will continue to occur through on site interpretation and public access to common areas, events and direct delivery of information”. In respect to the issues of connection and engagement the HIS is silent and must be revised.
- *Presentation*: Interpretation will embrace the concepts contained in the ERW Interpretation Plan. Tenants will be encouraged to communicate and celebrate the special nature of this extraordinary place. The RTBU RMA argues that many of the concepts of the ERW IP are not present in the HIS and that there is no mention in the HIS of any encouragement of the new tenant to communicate and celebrate the special nature of the ATP site.
- *The Eveleigh Workshops*. Originally the Eveleigh workshops were a binary site with the carriage workshops on the northern side of the western rail line and the locomotive workshops on the southern side. The current ATP site is adjacent to RailCorp’s Large Erecting Shed which was formerly part of the Eveleigh Locomotive Workshops and is where RailCorp maintains its rail heritage fleet.
- There are a number of other rail heritage locations in NSW. In the view of the RMA two issues arise for consideration. The first is the approach to conserving the heritage of the entire Eveleigh Workshops precinct and the other is the development of relations between the new ATP owners and the wider railway heritage community. Both of these issues are referred to in the ATP CMP and the HIS in our view whilst generalisations are made no concrete proposals are forthcoming.

Aboriginal workers and Eveleigh

The ATP CMP notes that the “Workshops was a major employer of Aboriginal workers... Aboriginal workers were paid less than their co-workers....unions and shop committees were active in supporting them”³This is one of a number of important social and cultural issues included in the ATP CMP. The HIS all but ignores this vital aspect of the social history of the Eveleigh workshops. The HIS must be revised to include this issue.

Best practice in railway workshop heritage policies and implementation

The ATP CMP includes reference to a comparative analysis of both the historical form and operation of the Eveleigh Locomotive Workshops and other railway workshops from the same period and the current form and condition and other former industrial workshops, including former railway workshops.

The HIS unfortunately makes no reference to other railway workshops in Australia or overseas. The experience of the Midland railway workshops in WA and the Ipswich Railway Workshops in Queensland are particularly relevant to the circumstances of the ATP.

No examination of best practice heritage conservation and implementation practices in former railway workshops sites was undertaken. This is a major shortcoming and should be remedied. Overseas sites that merit further examination include the Steam Museum at the Swindon Workshops, UK; the Railroad Museum of Pennsylvania and the cultural regeneration of the SNCF at Arles, France.

In the ATP CMP noted in relation to interpretation *“existing interpretation is a product of its time and does not give a coherent story of the whole site ...–interpretation history and methods have developed greatly over the last decade.”* The CMP refers to a number of means how this may be pursued but they are not included in the HIS.

An example referred to as *“the placing of machinery does not appear to have been organised with any overarching strategy that would allow the items to be understood in a meaningful way. Each item is displayed with an interpretative panel that describes the original use of the machine and its history but does not provide a connection with the social history of the Eveleigh workshops or a sense of how it operated within the site as a whole.”*⁴

The CMP indicates *“the significant elements that remains within the ATP offer great potential for the powerful and important social history of Eveleigh to be remembered”*.

An interpretation plan for the entire former ERWS site has been prepared. The HIS does not address the need for modernisation of interpretation nor does it include the important social history of Eveleigh. This important issue will be addressed in the RMA analysis of the HIS Appendix 1.-

Movable Heritage: The RMA believes this is a complex issue for the ATP site. The primary management policy document in relation to the management of the movable heritage collection prior to the S170 has been the Eveleigh Workshops Plan for Movable items and Social History. It noted

“Long term conservation of the outstanding cultural significance of the Eveleigh machinery collection should be an important component of the future use and management strategies.

The machinery and associated tools should remain together on site as assemblages, collections or systems

*No part of an assemblage should be removed from the parent relic. This includes all tools, stands and operating equipment.”*⁵

Section 7.0 of the document set out a number of policies to cover a range of potential issues. They included NSW government responsibility and finance to manage the collection, responsibility for interpretation and appointment of a specialist machinery supervisor. These policies were not implemented.

⁴ Ibid p50

⁵ Ibid p58

The ATP as part of its management procedures under S 170 of the Heritage Act conducted a Heritage and Conservation Register survey and its assessment of the machinery collection found *“the vast majority of items identified in the 1996 study of the site are still present and, generally are in good condition.”*⁶

The CMP identified a range of specific issues which produced constraints and opportunities for the future management of the collection and these included: NSW OHS standards, skills, subdivision of ownership of the collection, and power supplies.

CMP consultation strategy

S6.0 of the CMP indicates that the CMP community consultation strategy included Government agencies, local aboriginal groups, community organisations that have an interest or special attachment to site of the workshops and that it was designed to *“help formulate conservation management policies that respect and help maintain community values and opportunities to develop them.”*⁷ and that *“a strong theme that came through the consultation session was that participants thought of the significance of ATP in terms of the history of the Eveleigh Railway Workshops as a whole with as strong focus on the remaining buildings and machinery of the former locomotive workshops.”*⁸

The CMP in analysing the results of the community consultation refers to a number of themes including:

1. The continuing significance of the Eveleigh Workshops ...the workshop participants expressed a strong desire to keep the stories and experiences of those who worked who worked at Eveleigh very much in the present. The current owner’s agers of ATP are seen as custodians of this history and continuing story and have associated responsibilities *“a duty” to conserve and “communicate the history of the place”*

2. The importance of Eveleigh to the history of NSW .The place from which the NSW rail system developed, a place of great innovation, had strong links to the union movement and industrial relations and that it was a site where Aboriginal workers could find employment and one of the places where they struggled to gain equal pay.

3. The significance as Eveleigh as a place of work. *“Participants of the workshop felt that this theme which held a lot of meaning for the community, and was not sufficiently acknowledged by the existing statement of significance for the Eveleigh Locomotive Workshops SHR listing and not currently reflected at the ATP itself.”*⁹

4. With the workshops came a whole area unified by work and lifestyle. *“Participants found it important to remember the significance of the former Eveleigh Railway Workshops is tied to the surrounding area and vice-versa.”*¹⁰

⁶Ibid p72

⁷ Ibid p79

⁸ Ibid p80

⁹ Ibid p80

¹⁰ Ibid p81

5. Eveleigh as a site of technological innovation. Great pride was expressed in the significance of Eveleigh as a world class railway workshop with its associated collection of machinery.

The CMP, in analysing the results of the community workshop under the heading, **“community involvement, education and tourism opportunities**, said: *“Concerns were raised that the many opportunities for keeping the legacy of Locomotive Workshops current and relevant were going unrecognised and unexploited... the knowledge and memories of former workers was a valuable and untapped resource and that these memories and stories should be used to make the history of the site come alive- the Locomotive Workshops could be a tourist destination and a place for school excursions and tours.”*¹¹

Other issues identified included concerns that ATP should remain a technology park and not become *“just another business park”*.

The CMP noted that since the community consultation had been undertaken ATPSL had been active in its engagement with the community concerning its planning and implementation of a range of heritage works and provided opportunities for active participation through the Redfern Waterloo Heritage Task Force, the Eveleigh Steering Committee and the establishment of the ATP Volunteer group.

The ATPSL has been active in both community engagement and facilitating its involvement in the planning and implementation of a range of heritage works.

The RTBU RMA notes the Mirvac HIS has not pursued a consultation strategy with key stakeholders in the planning and implementation of heritage conservation. The RTBU RMA believes this is a significant omission in the HIS and must be rectified. It is not consistent with the principles underpinning heritage planning as embodied in the CMP and the practice of previous management.

RTBU RMA experiences with Mirvac consultation

A representative of the Association met with UG on November at a meeting convened to discuss North Eveleigh redevelopment proposals. It was the same day as the announcement by the Government of the sale of ATP. A list of questions about the RTBU RMAs concerns with the sale and future directions were supplied to UG who replied in latter correspondence to some of the questions but also said that they had forwarded the list to Mirvac who as the new owner were in a better position to respond. Mirvac has not responded to date.

A drop in day organised by Mirvac in December was attended by an RTBU RMA representative and a general discussion with Mirvac about broad strategies for the future and some Mirvac background information was referred to. However as the sale process was still recent the heritage issues would be addressed in more detail when consultants were engaged. An RTBU RMA representative attended the ATP open day held last December and was informed that the position hadn't changed and little information could be exchanged.

¹¹ Ibid p82

NSW Heritage Manual Guidelines

The CMP examines the NSW Heritage Manual Guidelines which incorporate the 5 types of cultural values identified in the *Burra Charter* into a specifically structured framework. This is accepted as the required framework format by heritage authorities in NSW. Places are assessed in reference to a specific set of criteria and these are detailed in the CMP.

The NSW Heritage Manual also identifies a specific set of historical themes relevant to NSW and is related to the ATP in table 7.1 of the CMP. Themes relevant to the ATP include Australian and NSW historical themes concerning the marking of the phases of life /persons –activities of, and associations with identifiable individuals, families and communal groups.

The RTBU RMA argues that the HIS fails to meet the NSW Heritage Manual Guidelines including the heritage cultural values identified in the Burra Charter and that the HIS should be revised.

Appendix 1: RTBU RMA Response to HIS Summary of Development against Heritage Policies for the ATP Site

The HIS argues that the Table in the Appendix outlines the key heritage policies that are contained within the CMP and the draft Heritage Asset Management strategies 2015-2020 that are proposed to guide the management of the heritage values at the ATP site.

P 1.8.2.1 p101. Constraints and opportunities .Dot point 1.For completeness the dot point should be included in full as it contains the words after ATP site “ *as an integral part of a rare surviving example of a nineteenth century railway workshops ...which was the largest in the state...and highly significant in the history of NSW*”

The RTBU RMA notes the comment that the highly significant machinery collection will be retained within the development of the site. However the issues relating to the machinery are far more complex and need to be considered in detail in this HIS. The CMP outlined a number of weaknesses concerning the collection and these were referred to earlier.

The RTBU RMA is concerned that that machinery could be relocated to public display without giving consideration to these wider issues and the views of experts in the field.

This dot point notes physical conservation will be addressed as part of a future DA as will the adaptive reuse of the Locomotive workshops.

The RTBU RMA argues a timeline should be established in the HIS for these applications to prevent fragmentation and to give certainty to an overall plan being adopted.

The RTBU RMA is concerned that the HIS only seeks concept plan approval for the Locomotive Workshop as part of the DA. We ask the question that as the application is made for the ATP site should it include reference to the Workshops Managers Office and the new Locomotive Workshops. Mirvac, as the proprietor of the site, is also responsible for its partner’s applications e.g. Centurio is the owner of the Workshop Managers Office. A number of issues mentioned in the DA will impact on these two significant sites.

P1. 8.2.1p 101-Constraints and Opportunities. Dot point 2. The RTBU RMA argues the HIS does not address ATP opportunities to communicate this significance through appropriate uses and interpretation. The CMP and Eveleigh Workshop Interpretation Plan have a suite of actions concerning interpretation. Little, if any, mention has been made in the HIS of them. An assertion is made with no evidence that sensitive revitalisation and interpretation of the site will occur in an indeterminate future.

The RTBU RMA argues

- The particular interpretations of the site set out in the CMP and EWS IP must be detailed in this HIS which has failed to grasp or acknowledge the many cultural and social issues associated with the ATP.
- Communication of uses and interpretation occurs at many levels within ATP, across the Eveleigh workshops precinct as a whole and between ATP and RailCorp as the owner of the adjacent large erecting shop. This has not occurred and should be remedied in the HIS.

- Communication also involves workers on site both present and future. No thought has been given to this issue in the HIS and this should be remedied in the HIS

P1 8.2.1 p101. Constraints and Opportunities. Concerns opportunities to conserve the machinery collection .Dot point 3. See earlier comments. No timeline is given when this may occur or whether a future DA will address. The comments of the HIS on this issue are particularly concerning i.e. *“the opportunity for exploration of the reuse of machinery as part of the final determination is not a compulsory requirement of the CMP but rather an option based in the practicality of such and undertaking. Detailed review and possible reuse will form part of the detailed application for the workshops.”*

The HIS injects a new concept to the CMP, a concept of compulsory and non-compulsory which have never been part of the CMP framework.

The RTBU RMAs submission has recognised the questions relating to the machinery collection at a number of levels are not simply answered. What the long ATP CMP process has revealed is the need for a collaborative relationship with various levels of experts, stakeholders, consideration of funding sources and a detailed plan. These issues are not referred to in the HIS and the HIS should be revised to incorporate them.

P2 8.2.1 p101 Constraints and Opportunities Dot point 4. Connection of workshops and machinery between Locomotive Workshops and RailCorp’s Large Erecting Shed. No avenues addressed as to how this may happen. The HIS says the final interpretation at the site will address this issue though no timelines are given.

P3 8.2.1 p102. Constraints and Opportunities. Dot point 5. Opportunity to enhance and engage with the social significance of the site through increasing community interest and enthusiasm.

The CMP had a number of concrete suggestions as to how this may happen and outlined what where the social significant issues .The HIS does not in any shape or form give recognition to social and cultural issues and how they may be concretely advanced.

The RTBU RMA believes this is a major shortcoming of the HIS and must be addressed.

The brief track record of Mirvac harnessing community interest and enthusiasm has had many shortcomings. The HIS says the final interpretation plan will address these issues. It recognises the continuance of volunteer conservation programs, events and open days and this is welcomed although in a later section this commitment in our view is heavily compromised.

P3 8.2.1p102 Opportunities and Constraints .Dot point 6. Enhancing the significant relationship between ATP and North Eveleigh. No ideas set out in the HIS as to how this may done. It instances the physical connections between the sites (a pedestrian and bicycle connection between the two) but that *“this will require owner/occupier partnerships and is dependent on the financial feasibility of the construction of a new overpass.”* This is a complex issue.

The RTBU RMA is sceptical that differing private sector interests will be able to address this issue without involvement of Government. Coordination between railway significant sites is fragmented and the ATP sale is likely to hasten this process. For the example given above concerning the

pedestrian crossing the issue of private vs public benefits is raised front and centre. We believe the sale proceeds from the ATP sale should be reinvested in a feasibility study into the physical connection between the sites and this would include financial, economic, social and environmental benefits and be included by Urban Growth in the redevelopment of Redfern Station.

P7.8.2.1 P102 Opportunities and Constraints. Dot point 7 and 8. Similar to the above and refers to engagement by the ATP with significant railway heritage sites. No detail is given as to how the proposed Mirvac redevelopment application will apply. Similar comment to above in that it is our view government intervention will be required for railway heritage planning and implementation.

The HIS indicates this issue will be addressed as part of the interpretation planning process. No timelines are given.

The RTBU RMA does not believe Mirvac will be capable of furthering this matter in a constructive manner and that it should form part of the role of Government. We point to the document: *All Aboard: A Fresh Start for Transport Heritage in NSW*¹² which outlines option for the future. This review did not include the ATP site.

The Report said that...*far from being a fringe sector peopled by marginal enthusiasts, rail heritage appealed to wide cross section of the public, and that, if the sector was properly managed, it could be a substantial source of revenue for the state... there are many factors which led the reviewers to believe there is no choice but to turn the page and make a fresh start under a new management structure...*¹³

P4 8.2.1p102 Constraints and Opportunities p102Dot point 9 refers to the ability of the site to provide evidence of engineering processes ...through remaining machinery and design.

The amount and type of machinery remaining on site provides many opportunities to interpret the history of the workshops. The CMP gives a suite of ideas as to how this may be done and these should be included in this HIS.

The RTBU RMA believes those assertions in the HIS that this will be closely addressed and the proposed development will not compromise this opportunity should be substituted in the HIS for the concrete plans of the CMP and Eveleigh Workshops Implementation Plan.

P5 8.2.1 p102. Constraints and Opportunities. Dot points 10 and 11 these are grouped in the HIS. They refer to various aspects of the social significance of the ATP site.

The RTBU RMA finds it disturbing that the key elements of this point have not been referred to in the HIS. In particular what the social significance of the ATP site is to former workers, current volunteers and tenants, the local community and the NSW railway community. In the preparation of the HIS there has been little or no engagement with these organisations.

One example is given in the HIS of an interpretative product and it states it will build on this.

¹² All Aboard: A Fresh Start for Transport Heritage in NSW May 2013. Andrew Scott, Richard Lord Faulkner and Patricia Azarias. The Review was initiated by the Department of Transport NSW as a Rail Heritage Review to examine the current management, governance and financial support arrangements for rail heritage in NSW to formulate a suitable approach for the ongoing management of NSW rail heritage assets.

¹³ Ibid Executive summary p6-10

In the view of the RTBU RMA Interpretation should be a lot wider than this. For example the HIS claims that long term interpretive opportunities are being assessed. We have severe doubts as to the HIS understanding of this issue. What are long term interpretative opportunities? A timescale is needed. No evidence is presented about harnessing community interest. In our view this is a foundation principle of the CMP.

Once again in Dot point 11 the HIS excludes a key component of the dot point: the reason communicating the social significance is to act as a testament. How will interpretative products be worked upon or developed without involvement of former workers and the organisations that represent them? The HIS comment that long term interpretative opportunities at the site is being assessed as part of the current and proposed DAs. The HIS shares no insights as to what issues are being included in the document that is being worked on. What are the timelines of future DAs?

Inclusion of former workers is consistent with the Burra Charter principles which include *"Conservation, interpretation and management of a place should provide for the participation of people for whom the place has special associations and meanings (Article 12 Burra Charter.)"*

The CMP in discussing Social heritage values noted in theme 1 the continuing significance of the Eveleigh Workshops and the views of workshop participants who *"expressed a strong desire keep the stories and experiences of those who worked at Eveleigh very much in the present...Concerns raised included the workshop participants felt that the knowledge and memories of former workers was a valuable and untapped resource and that these memories and stories should be used to make the history of the site come alive- the Locomotive Workshops could be a tourist destination and a place for school excursions and tours."*¹⁴

The RTBU argues the CMP contains many references to the social significance of the site, the role of unions, the struggles for wages and conditions, improvements in OHS etc. These and allied issues must be included in Interpretative Plans in the HIS following extensive consultation with stakeholders. The perspective of making the history of the site come alive through an education centre focussed on a number of social heritage values as outlined in the CM and should be included in the HIS.

P6 8.3.2 Aboriginal cultural heritage¹⁰³**Constraints and Opportunities.** There are a number of references to Aboriginal cultural and social issues referred to in the CMP including associations with work and conditions, equal pay, unions and shop committees.

The HIS argues that detailed research that investigates historic links of Aboriginals to the workshops and local area forms part of the commitment to implement the key principles of the ERW Interpretation Plan. The reference to key principles of the ERW IP should be deleted. They are principles and no designation of key versus others has been made in the original.

The RTBU RMA is concerned that implementation of ERW principles in this dot point will only be explored and this contrasts with concrete proposals already in various documents. As far as consultation with the Aboriginal community we are unaware of any to date.

¹⁴ P80

The HIS comments in this section are that Mirvac will explore long term opportunities to include the aboriginal community in programs. This should be given a concrete form with identifiable timelines rather than “*exploring*” in the not defined “*long term*.”

The RTBU RMA submits that this point needs to be expanded in scope. The CMP has a number of concrete proposals concerning these issues and they should be included in the HIS.

P7 8.2.3.p104 Guiding Principles-Burra Charter. The RTBU RMA has argued earlier that an examination of the principles of the Burra Charter as applied to this HIS leads to the conclusion that the HIS has failed to apply a number of its principles. This section of the HIS qualifies the commitment to the principles of the Burra Charter. It introduces the concept of “*best practice principles*.”

This is in our view a Mirvac interpretation of the Burra Charter. Best practice principles are complex issues and their adoption requires specific detail, not a non-documented assertion. We believe the HIS must adopt the Burra Charter in its entirety.

Comments in this section include reference to long term cyclical maintenance.

The RTBU RMA submits that the timescale and expenditures for this maintenance should be outlined in broad detail in the HIS and a comparison made with maintenance expenditures by ATPSL.

P 8.3.1p104. Significant buildings .This section refers to the Works Managers Office and the opportunities to enhance the connection between it and the entrance to ATP. The RTBU RMA notes that the DA only relates to the Locomotive Workshops even though work will be undertaken on a key issue of connectivity between the Workshop Managers Office and the entrance to the ATP. In addition this significant building is owned by Centurio who are not mentioned as a party to the development application.

P8 8.3.2 P104 Machinery .As earlier indicated the machine collection poses a number of issues one of which is interpretation. This section notes “*there is great potential to interpret the Machinery collection, engage with former workers and integrate the machinery into identity and use of the ATP site.*”

The RTBU RMA argues that there is a need for an integrated strategy for the machinery collection. There is a real possibility, given some of the other comment in the HIS about machine reuse strategies and public art for the implementation of one policy in relation to machines to be in conflict with others.

There has been no attempt to engage with former workers .This section indicates the machinery interpretation will be part of the final interpretation plans. There is no commitment to agreeing with CMP implementation strategies and no timelines for the implementation plan.

The RTBU RMA argues that the HIS must be reviewed to incorporate these issues of an integrated approach to the machinery collection, engage with former workers , the inclusion of CMP machine collection implementation strategies and a timeline for implementation plans.

P8 S8.3.3P105- Site and Setting. This section concerns the connection between the components of the wider Eveleigh Workshops precinct and the changes to ownership as exemplified by the sale of the ATP site. The HIS makes no comment as to how this issue may be progressed.

The HIS contains a number of issues about the heritage plans and co-ordination between various organisations who are involved in railway heritage.

The RTBU RMA believes that a successful prosecution of these issues will only occur through the involvement of government.

P 12 8.5 2 p110 CMP Policy Objectives. The HIS only refers to the first 2 of the overall 11 objectives. In the RTBU RMA view all should be referred to in the HIS and commented upon.

Objective 4 refers to the achieving of enhanced public understanding and engagement of the role of the former workshops at ATP and their significance.

Objective 7 refers to improving ATPSLs business opportunities through its heritage assets.

Objective 8 refers to the objective of contributing to ATPSLs Corporate Social Responsibility program. Presumably Mirvac will need to undertake an internal review to include the objectives that are sought through the implementation of the CMP policies within its various policy documents and programs. A number of the policy objectives are interconnected.

The RTBU RMA submits that the full suite of CMP policy objectives is applicable to Mirvac and the HIS should include a response to all the objectives set out in 8.5.2, CMP Policy Objectives.

P 13 8.5.3p110. ATP constitution and entry criteria. The nature of the site is profoundly changing from a Technology Park whose Constitution is *“to establish, maintain and operate a facility of an international standard for the promotion, development and application of sciences and technologies.”*

The entry criteria notes that companies who wish to occupy ATP are to be involved in the development and commercialisation of new technology.

The HIS comments argue that the CBA won the tender for the ATP site due to their commitment to innovation, and technology being a core focus in their use of the site. An examination of CBA's activities at Parramatta in the RTBU RMA view make it very difficult to sustain a case that the core activity of the Bank will be in the research ,development and commercialisation of new technology.

Any large corporation will be involved to some extent in these activities but unless they are specifically a technology business e.g. Atlassian. The CBA's financial activities are the core of its business.

The CBAs business activities are qualitatively different to the other occupants of the ATP.

In terms of floor space and numbers of employees the CBA will be the major tenant at the ATP.

The RTBU RMA is unaware of the process to change the ATPSLs constitution and entry requirements to reflect the new realities and would seek advice from the administering Department in this regard.

P13 8.5.4p111 RWAHTF and Eveleigh Steering Committee. A key component of the development and implementation of heritage plans has been the consultation as exemplified by these 2 bodies. The HIS has not engaged with this issue at all and despite requests in writing from the RTBU RMA has refused to engage with a key stakeholder on this issue. The CMP refers to 5 key considerations raised by these consultative committees.

The HIS makes general statements that implementation will be part of the proposed redevelopment of the site, refers to the management of movable collections and links to other rail heritage places. The RTBU RMA has earlier referred to integration and governance issue related to these two issues.

The HIS makes no mention of 2 key points, a workers wall; and workers social and cultural history of the site, and Railway arts.

The RTBU RMA argues that the HIS has consistently ignored and devalues the social and cultural history of the ATP site.

The RTBU RMA submits that all items referred to in this section must be included in the HIS and implementation plan together with a consultative mechanism to implement the outputs of previous consultations.

P14 S8.5.5 Eveleigh Railway Workshops Interpretation Plan and 8.6 and Opportunities arising from Analysis of constraints are grouped togetherP111 and 112.

S8.5.5 concerns strategies to communicate the significance and history of the site for future visitors and residents and in particular social history.

A number of concrete proposals contained in the CMP have not been referred to in the HIS. They should be set out in the DA and HIS and include: the 5 interpretative zones, replacement of existing signage including a number of strategies to enhance interpretation suggested in the interpretation plan including an audio visual interpretation which conveys the stories of the site and former workers and the installation of portraits of former workers reflecting diversity of the working environment.

The HIS comments that *“the final interpretation plan will build upon and refine proposed strategies in the 2013 Interpretation Plan.”* The comments section refers to *“to develop the most feasible, effective and innovative interpretation features and instillation”*.

The RTBU RMA argues that the EWS Interpretation Plan must be the default position and a timeline set out for its implementation. We express real concerns as to Mirvac's intentions. From our experience what is feasible and effective more often than not lies in the eye of the beholder.

The RTBU RMA submits the concrete proposals contained in the CMP and EWS IP should be included in the HIS and that any changes to the EWS Interpretation Plan should be only be made after a consultative mechanism of key stakeholders has agreed to any variations and/ or alterations or additions to the current plans.

P14 s8.5.5 Eveleigh Workshops and Interpretation Plan and S8.6 Opportunities Arising from Constraints.p111 and 112.The Appendix appears to be disjointed in this section. In the CMP there

are two separate sections. The section in S8.6 Opportunities Arising from Analysis of Constraints is not in this part of the HIS.

In the view of the RTBU RMA there are components of 8.6 that should be included in the HIS. The introduction to 8.6 in the CMP indicates *“this section has brought to a light a range of key issues and opportunities for the future conservation and use of the ATP site and its significant components...these opportunities will allow ATP to better demonstrate and communicate its industrial past, and respond to key related paces...”*¹⁵

Issues not included in this section by the HIS as set out in S8.6 of the CMP include-*“Making Eveleigh whole.”*

The dot point s8.5.5 concerning the machinery collection does not include the first sentence *“the context of the significant amount of remaining machinery is now limited with little human or operational connection.”* For the RTBU RMA these are crucial issues in addressing the machinery collection and must be included in the HIS.

The HIS s8.6 does not include the last dot point of this section of the CMP **Opportunities** *“the CMP has identified some real areas of opportunity. The community consultation process revealed a range of opportunities to harness community passion to conserve and communicate the heritage significance of the place. The site is also an ideal place to interpret broader NSW and Eveleigh Workshop stories through the remaining significant buildings and machinery and through the evident community interest.”*¹⁶

The HIS says in relation to S 8.6 see the earlier comments of S8.5.5. even though quite different subject matters are canvassed.

The RTBU RMA has referred in our submission to the need to make Eveleigh whole, a process whereby this may be achieved, timelines for its achievement and areas for real opportunities using the community consultation process. These issues should be incorporated into the HIS.

Of special significance to the RTBU RMA is the CMP reference in the Opportunities section referred to above is the ATP site being an ideal place to interpret broader NSW and Eveleigh Railway Workshop stories. There a number of forms which this could take, possibly under the direction of a specific Education Centre this could also include cultural and social history associated with the neighbourhood and wider Eveleigh railway precinct.

The RTBU RMA submits a proposal for an Education Centre should be include in the HIS, a feasibility study conducted involving all stakeholders and funded through the sale proceeds of the ATP sale.

In the RTBU RMAs view it is hard to ignore the fact that the HIS has comprehensively failed to address areas of opportunity identified in the CMP and has in its commentary section and selection of what to include/exclude in the HIS has exhibited a consistent pattern of excising and /or downplaying the importance of the social and cultural history of the ATP site and refused to engage effectively with these areas of the CMP.

¹⁵ Ibid p112

¹⁶ P112.

P16 9.2 ATP Conservation Vision Statement p115. The specifics of the statement are not addressed and generalised comments only are made. No reference is made, yet again, to how Mirvac will address the requirement set out in the dot point to *“engage with workers past and present and the wider community”* and the next dot point of *“present the old and new Eveleigh/ATP stories in an engaging way-both on and off site.”*

The RTBU RMA throughout its submission has argued that the HIS fails to meet the vision, policies and details of the CMP.

In the view of the RTBU RMA the jury is out on whether a private property developer with little history or experience in heritage conservation, facing a unique challenge, the most complex and largest heritage conservation task in NSW will be able to develop board and management commitments and resources to maintain custodianship of the site or whether over the medium and long term there will be drift to just another business park.

The custodianship responsibilities are to the people of NSW, former and current rail workers and the local community.

P17 S9.0 Conservation Policy.p115. It notes that the first part consisting of the Vision Statement and the second part, related to the first part, by a series of policy objectives and individual policies to match these objectives. It says the policy recommendations *“are all based on the assumption that they should be implemented at the first available opportunity...”* (It does recognise that in practice a number of factors may impact on deliverables.)

The RTBU RMA submits the approach in the HIS should be to implement as a priority these policies and the onus should be on Mirvac to prove what impediments there may be and the practicability of overcoming them.

P 17 S9.2 ATP Conservation Vision Statement.P115. The HIS says that in the long term there will be on going requirements to continue with public programs on site such as open days, heritage activities and volunteers. This is in our view disturbing proposition. No clues are given as to what the long term is.

The RTBU RMA submits that if public programs are not instituted immediately they will be severely undermined. Volunteers will become dispirited and drift away. Public interest will plummet. This must not be allowed to happen and must be reflected in the HIS.

The comments sections of this part of the HIS say concerning engagement *“it is hard to access the exact needs at this point given the emphasis on the CMP policies and the ERW IP to ensure the ongoing public involvement in the site.”*

The vision statement involves a considerably wider cross section than public involvement referred to and says all stakeholders should be involved directly. The CMP has numerous examples of how these groups have been involved in various processes to develop the CMP, ERW IP etc.

The RTBU RMA submits the long history of involvement of stakeholders in ATP development and implementation must start immediately and these requirements should be incorporated into the HIS.

The HIS says there are many ways to how public involvement can be achieved without mentioning any. It also ponders how this can be achieved without impacting on the day to day commercial requirements of the site. How the day to commercial requirements restrict access to the site is not the experience of the ATPSL nor has it been explained how under the new ownership arrangements this would be different. An explanation should be provided in the HIS.

The RTBU RMA notes that the CMP section, *9.3 Conservation Policies*, is not included in the HIS.

The RTBU RMA recommends it should be included in the HIS as it provides an overview of all the policy conservation areas.

Analysis of Policy Objective Section

As many of the issues canvassed in the policy Objectives referred to in the HIS and contained in pages 117-131 of the CMP have been commented upon earlier in the submission we will not duplicate them and only comment on a few of them.

P117 Policy Objective 1- conservation planning. During the course of the development a range of matters will be implemented which impact on conservation planning, on both short and long term decisions.

The RTBU RMA recommends the HIS should be reviewed to include long and short term perspectives for the conservation planning framework.

Our analysis does not agree with the HIS statement “that *the proposed redevelopment in its current form will readily comply with all planning documents.*”

1.6 Review of the CMP. Envisaged to be every 5 years. When will this occur and will it include processes for full engagement of interested parties including former workers and their representative associations, appropriate independent experts, local community including aboriginal representatives.

The RTBU RMA submits these matters should be included in the HIS

1.7 concerns “*the strong community attachment to the heritage significance of the ATP site should be acknowledged through regular consultation on changes to the site and its management.*” The comment is made that specific policies for community involvement and consultation are included in policy objective 9.

The RTBU RMA submits that 1.7 should be included in the HIS together with the specifics of Policy Objective 9.

Policy Objective 2. Conserving Heritage Significance p119-121. The comments section of the HIS says “*the proposed development of the site, once complete will provide an appropriate framework for, easy long term conservation of the significant heritage, buildings machinery and movable heritage items contained within the ATP site.*”

The RTBU RMA is concerned that the implementation of the framework will be held up until the site is redeveloped and this will take several years. Conservation should commence immediately .The CMP calls for the immediate implementation of policies and the HIS must be changed to reflect this.

Policy Objective 5 –Physical Conservation and Maintenance of the Machinery Collection p125. The HIS does not refer to 5.2 which include an action to engage relevant experts and *“consult with appropriate stakeholders prior to the implementation of these conservation actions.”*

The RTBU RMA argues the HIS should be revised to include 5.2.

5.5 This section notes the constraints in using machinery *“nonetheless ... the opportunity to restore items if the Machinery Collections to operational use should be considered.”*

The RTBU RMA argues that consultation with stakeholders should be undertaken on the details of how individual machinery will be incorporated and a study by independent machinery experts to consider the feasibility of bringing machines into reuse, as set out in the CMP 5.5 actions on a case by case basis be undertaken. These issues should be included in the HIS.

P41Policy Objective 8 New Development Opportunities P128. 8.5 *“New development on the site of the former foundry should creatively interpret the historical use of this part of the ATP site...”*

The HIS indicates note there is the opportunity for creative interpretation of the historical use of this site.

The RTBU RMA agrees this should occur with, for example, using the bricks as part of a workers wall and a video instillation which encapsulates the sights and sound of an operating foundry.

P 42Policy Objective 9 community involvement and consultation.p129 The HIS argues these policies reiterate many of the policies previously discussed. The RTBU RMAs analysis of the HIS has shown a consistent pattern of underplaying and /or avoiding Community Involvement in consultation. This approach has been continued in the Policy Objective section of the HIS

This section argues community interest should be harnessed. The Association argues this should commence immediately before redevelopment commences. This is consistent with 9.2. *“ regular consultation with the local community and interested groups regarding changes, new works, and /or new plans should become part of the future planning of the place.”*

9.5 indicates *“former workers should be encouraged to contribute to the ongoing conservation and interpretation of the place ...”*

The HIS argues that the proposed development will comply with policy objectives 9.1 to 9.5. It argues that the potential impact is not applicable to the application and that in the comments sections these policy objectives are not relevant to the DA.

The RTBU RMA disagrees strongly with this section of the HIS concerning compliance, impact and non-applicability of this policy objective to the DA. We believe the HIS must be reconfigured to include all points in this policy objective and commence immediately with the actions set out in this section.

P42-43 Policy Objective 10 –interpretationp130

The introductory paragraph refers to *“it is vital the whole story of the place is told.”* This comment should be incorporated into the HIS.

All of the points of this objective i.e. 10.1 to 10.11 are included in the HIS. However the importance of a number of items is not sufficiently recognised and the RTBU RMA does not agree that this section complies with the DA and that the proposed interpretive elements will cover the range of issues that need to be included.

Its comments are far too general to give any meaning as to how the site will be interpreted. The RTBU RMA submits the various components of Policy Objective 10 should be individually examined as to how they will be interpreted. No information is given as to the composition of the proposed interpretive elements. The CMP, for example, in 10.9 refers to video installations, soundscapes, podcasts, recreations of machinery assemblages and uses; and an actual locomotive.

The RTBU RMA recommends that the HIS should be reconfigured to adopt our suggested approach.

There is no commentary concerning 10.10 *“Eveleigh Locomotive Workshops imagery should be adopted as part of the ATP branding and signs.”* and 10.11 *“Names and titles historically associated with the Eveleigh Workshops and the Alexandria goods yard should be considered in naming new buildings ,roads and parks within ATP”.*

The RTBU RMA submits that 10.10 and 10.11 should be incorporated into the HIS.