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OBJECTION: SSDA 17 8517 and SSDA 17 8449

I wish to register the **strongest objection** to the proposed changes as outlined in the State Significant Development Applications 8517 and 8449.

The objection falls into six key areas:

- The proposal to put a supermarket in Bays 1 & 2 which as a result requires the addition of a travelator and loading dock
- The scant references to the preservation of the valuable heritage items and the degradation of the heritage value of the site itself through these proposed changes
- The impact on public access and pedestrian safety
- Destruction of the internal scale height and proportion of the buildings
- Future risk to the blacksmithing operations
- The failure to meet key heritage and existing development approval conditions.

The intrusion of penetrations and services (including travelator and delivery/loading dock) necessary to facilitate the provision of a supermarket within the Locomotive Workshop will give rise to unacceptable adverse impact on the heritage significance of the fabric of the building.

In addition, the proposed location of a loading dock in Bays 1 -2 will mean that the public is no longer able to appreciate the scale and grandeur of the Davy Press assemblage, which is unique in Australia, and the proposal to separate it from its furnace and the proposed location of the loading dock are unacceptable.

The inclusion of a travelator in terms of its scale, character and location is inconsistent with this State significant industrial place, and will irreparably erode the engineering, aesthetic and cultural significance of the place to an unacceptable degree.

The assertion that vehicular traffic will be removed from Locomotive Street to result in a 'more pedestrianised' route does not acknowledge the fact that semi-trailers and other vehicles must continue to use Locomotive Street access to reach Channel 7, Global TV and RailCorp lands at the western end of the site.

The proposed destruction of the original scale and space of Bays 1 and 2 and Bays 10 – 13 (Exhibition Hall), will remove the only remaining vestiges of the original cavernous and exceptional workshop spaces, precluding any future understanding of the original aesthetic, architectural and engineering intent of the building or its former use to build and repair locomotives (with associated highly significant cranes).

The reduction in spaces of original height, scale and proportion is an unacceptable outcome of the proposed development. In addition, the signage proposed to the exterior of the building is excessive and unnecessary. It will result in excessive impact on views to the Locomotive Workshop and unnecessarily diminish the character of this State significant site.

The proposed development includes the relocation, deaccessioning and storage of considerable parts of the Moveable Collection. These steps are irreversible and will lead to a permanently and significantly diminished Collection. It will also irreversibly diminish the potential for research and interpretation of our shared cultural, social and working history. The Eveleigh Collection is enormous and the expertise available to understand it diminishing due to the ageing cohort of former workers.

Many items are part of assemblages that need to remain intact. Much of the information on this Collection has been garnered to date through the generosity of former Workers and volunteers. No mention is made of these people and how their intellectual property will be protected and documented to achieve the interpretation outcomes proposed and to maintain the link for future generations.

The ATP movable heritage collection derives much of its significance from its relationship and proximity to the Park and the wider Eveleigh Railway Workshops precinct. Removing items from a place will diminish or damage the significance of the built heritage, Collection and the place.

Continued use of the significant blacksmithing machinery is essential to maintain the significance of this equipment and the place in general. While the proposed development purports to provide opportunities for this to occur, it actually endangers continued blacksmithing activities into the future by co-locating these activities with incompatible retail and interpretation/museum type uses. As blacksmiths are required to wearing hearing protection, will retail workers customers also be required to do so?

The proponents have not provided details of how they have complied or propose to comply with the Public Heritage and Access Covenants that apply to the site. These include:

- The status of the Draft Management Plan for the Moveable Collection;
- The update to the s170 register to demonstrate real impacts of the proposed development on the Collection;
- The conduct of priority heritage works identified in the draft MCMP, including conservation of the Davy Press assemblage, conservation of the forges;
- The preparation of an updated Heritage Asset Management Strategy.

Compliance with these covenants must be the foundation of any development proposal – not an afterthought.

The proposed delivery and service vehicle route through the top of the ATP site and Innovation Plaza present unacceptable impact on public access and public safety within the site. This is the main route into and out of the site for pedestrians, and also the main route through the site for pedestrians and cyclists accessing Redfern and the Railway station. To propose such a dangerous conflict of uses at the entrance and the most pedestrianised part of the site cannot be justified.

The heavy reliance within the application documentation on 'cultural heritage tourism' with this use and strategy for making a successful destination totally undocumented does not provide any certainty that future operations will be able to meet the requirement for public access so important for a site with this level of State significance.

The proposed development should not be approved until the proponent and Consent Authority can demonstrate publically that the proposed development should not be approved until the proponent and consent authorities including the Heritage Council ensure:

1. The supermarket and associated loading bay and travelator are relocated to another part of the site, as they cannot be accommodated in the Locomotive Workshops without unreasonable adverse environmental and heritage impacts
2. The ongoing safe and convenient public access to the site and the moveable collection
3. The existing movable heritage collection is conserved and interpreted, without storage and deaccessioning except under circumstances where exceptional heritage outcomes can be demonstrated.
4. The ongoing use of the blacksmithing equipment and workshop and safeguard this continued use from conflict with proposed alterations such as the retail pod insertions in Bays 1 and 2 and proposed retail uses in adjacent bays.
5. Compliance with the Heritage and Public Access Covenant can be fully demonstrated to the public including update of the s170 register to demonstrate the real actual impact of the proposed development on each element of the Collection
6. Compliance with the most recent final Management Plan for the Collection, *The Eveleigh Workshops Management Plan for Moveable Items and Social History* prepared by Godden and Mackay in 1996
7. Preparation of an interpretation strategy and cultural heritage tourism business plan in collaboration with community and stakeholders

In all, the approval should not proceed because of the following issues are unresolved in the application:

- It fails to meet the guidelines set out by the NSW Government Architect 'Better Placed' for Government Departments and State Significant Developments in information, options or clear outcomes
- It fails to meet the previous conditions set out in any former approvals (backlog works)
- It fails to protect the significance of Bays 1 & 2. For items of State level significance by physically and visually separating systems of machinery.
- It does not convey the real impact of proposed changes to Bays 1, 2, 3 & 4a and makes assumptions that it has no heritage impacts where there clearly is a physical, historical and visual change proposed.
- It has not included or considered the comments made by the community at the public consultations.
- The inclusion of new structures within Bays 1 & 2 for new and unrelated purposes (garbage & deliveries) lowers the significance and the study has not investigated alternatives to transept these important bays that demonstrate the Davy Press system that forms the main feature in Bay 1 North but the same issues are relevant to the buildings Annex areas.
- It does not include the impacts of garbage or delivery trucks using the public space in Innovation Plaza.
- The new structure divides the historical functionality of the Davy Press and its furnace, which lowers the significance of each item within Bays 1North as well as the place as a whole.
- It does not indicate the impact of blacksmithing functionality when penetrations are made through the acoustic wall separating bays 1 & 2 from Bay 3.

- No new alterations should be allowed that further diminish the future use of currently operating machines, other machines or operational restoration of other machines within Bays 1 & 2. This should be included with the assessment of uses of Bays 3 & 4a as well as Annexes.
- An Archaeological Study should be carried out prior to any works particularly in Bay 3 region as no previous study has been carried out for any potential underground structures.

The Blacksmith Workshop at Eveleigh is of very high cultural heritage significance at State level and recognised internationally as one of the best intact worldwide industrial blacksmith shops.

The State significance is partly formed by the maintaining the industrial systems used within the Blacksmith Shop. These systems were historically throughout the entire workshop but were only preserved in Bays 1 & 2. Any disruption of the industrial systems within these bays is detrimental to the intactness displayed within the Blacksmith Shop.

While the preservation of the Eveleigh Rail Workshops has had a very fraught past it is expected that the few remaining intact spaces be preserved in the highest order. While better interpretation does and will improve the site, interpretation should not be in lieu of degrading the historic intactness.

The submission State Significant Development Application SSDA 8449 and 8517 Environmental Impact Statement should not be approved until all the matters above are resolved.

Sincerely



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