

Ms Annie Leung
Planner
NSW Department of Planning

15 December 2017

Dear Annie,

OBJECTION: SSDA 17 8517 & SSDA 17 8449 LOCOMOTIVE WORKSHOP

We have lived in Wilson Street opposite the vehicular entry to the North Eveleigh site for nearly 40 years and have been engaged with the successive planning and heritage issues. As you can see Bruce is an expert in these fields. We accept in full the ARAG assessment as it covers most issues of concern. We respond to it with some general comments, while endorsing the bulk of the ARAG submission.

This proposal does not even pretend to honour the R & D and incubator intents of the ATP linked to the aggregate of educational and research hubs in the area. This is a huge betrayal of the potential to add value to this area and a major part of the City economy and culture. It could complement the creative hub developing on the Northern side, but does not. It seeks to commercialise and theme park the whole, and confuse the conservation, educational and interpretive roles with commercial benefit, in narrow and opportunist terms. The proposed retail and supermarket is not complementary to the character and culture of this area. It is evidently car dependent. Locals will stay away in droves. Conventional retail of this sort should be in the new building and avoid the destruction of heritage fabric above and below ground, such as the traveller. Take note of the approach with the 'Carriageworks', with no external signage, or indeed is required; the buildings are wayfinding enough. Nobody gets lost finding the place. There was signage for the Saturday market, since removed. It seems more popular than ever.

The Locomotive Workshop is to be subsumed by both mixing retail with the artefacts as well as the retail components particularly the supermarket. The loading dock will be hugely destructive of the key museum component apart from manoeuvring trucks in a pedestrian space. The retail components should self-evidently be located in the new buildings with a touch the fabric lightly approach to the Locomotive Workshop given its National significance, justifying World Heritage status if is not destroyed by this appalling scheme.

No more in-situ fabric, so called moveable heritage, most of it is actually fixed, should be re-located or moth balled.

Other changes to the fabric including the insertion of columns through the structure to support roof platforms presumably for maintenance purposes when the existing structure would appear adequate to support such structures. The removal of louvred roof lights and the extent of change to the roof lighting pattern needs justification against a Burra Charter approach of '*doing as little as possible and as much as is necessary*'. It seems the heritage consultant has been led by the nose and not guiding the works; disgraceful.

While the 1600 car spaces are located in Building 2 and do not impinge on the Locomotive Workshop they underpin the huge overdevelopment for suburban outreach, not to serve this community or even the inner city, which is already well served with such facilities. Terms such as *'bespoke retail'* are used to describe this conventional and outmoded shopping experience. If justified, it must not impinge on the heritage precinct. The term *'heritage traveller'* is also used (sic).

We were expecting this proposal to include the cross-railway links that at so overdue and necessary to function?

The potential of to re-invent the *'Innovation Plaza'* as the major public entry point to the precinct has not be realised, in fact diminished by the dreadful loading bay and trucking access.

There is scant recognition in the proposal and narrow heritage analysis that this was the most important railway complex in the nation, of its historical importance to both the nation as well as NSW. To quote the passion of Richard Butler *'piece by piece Eveleigh has been eroded away'*.

As the bottom line seems to speak loudest this is not about a major loss to our history and culture, it is also a major economic loss.

Quoting the ARAG submission:

'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 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 1 North 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.

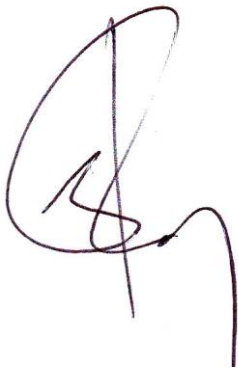
The State significance is partly formed by the maintaining the industrial systems used within the Blacksmith Shop. These systems were historically throughout the entire workshop but were only preserved in Bays 1 & 2. Any disruption of the industrial systems within these bays is detrimental to the intactness 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 Environmental Impact Statement should not be approved until all the matters above are resolved collaboratively with the community and relevant stakeholders.

Regards

Bruce & Sarah Lay

A handwritten signature in dark ink, consisting of a large, stylized capital 'B' followed by a series of loops and a long horizontal stroke extending to the right.