



To: Annie Leung <Annie.Leung@planning.nsw.gov.au>

**RE: State Significant Development Applications Locomotive Workshop Australian Technology Park, Eveleigh SSDA 17 8517 - Bays 1-4a, and SSDA 17 8449 – Bays 5-15**

REDWatch object to the above DAs. This submission provides the additional information referred to in our objection placed on the Major Projects website.

Any redevelopment of the heritage listed Locomotive Workshop and its heritage protected collections and active heritage activities, needs to deal with the entire state heritage listed package. These DAs deal primarily with a development within a heritage listed building and deal in a much lesser manner with the fixed and movable heritage contents, the heritage activities and statutory plans that come with the building and which need to be comprehensively dealt with by any redevelopment proposal.

When Mirvac purchased the Australian Technology Park, which included the Locomotive Workshops, it entered into covenants to ensure community access through the site (along part of the route now proposed to the loading bay) and to protect and deal with the heritage items that came with the site. These covenants were pushed for by the community following a threats analysis of the sale undertaken by the City of Sydney Council. The Positive Covenant – Heritage states in part:

*The Proprietor will comply with the Heritage Act 1977 as amended, consolidated or replaced from time to time in relation to all items identified in the State Heritage Register listings applicable to the Land as at the date of this covenant, and (unless otherwise agreed by the Heritage Council in writing) without limitation, must:*

1. *comply with all obligations under and by virtue of Section 170 and Section 170A of the Heritage Act 1977 (as if the proprietor was a government instrumentality for the purposes only of complying with those sections);*
2. *comply with the Australian Technology Park heritage documents, namely the:*
  - a. *Conservation Management Plan 2014-2019 (attached to this covenant) (CMP);*
  - b. *Heritage Asset Management Strategy 2013-2018 (attached to this covenant) (HAMS);*
  - c. *Moveable Collection Management Plan 2015-2020 (attached to this covenant) (MCMP),**(collectively the **Heritage Documents**), all on the basis that any variations, modifications, deletions or additions to any Heritage Documents must be endorsed by the Heritage Council of New South Wales (**Heritage Council**) and that all Heritage Documents must be updated and endorsed within five years of the date of the previous endorsement.*

In the words of the CMP:

*The Eveleigh Locomotive Workshops Machinery Collection is listed in the State Heritage Register for the contribution it makes to the significance of Eveleigh Locomotive Workshops. The Collection comprises selected examples of the machines and equipment installed in the Workshops at the time that it closed and includes individual items dating from the late nineteenth century through to the mid-twentieth century. (page 57)*

Mirvac is required under the covenant to act as if it were a government instrumentality in looking after this equipment and is required to have an approved plan for managing the collection.

In the State Heritage Listing for the Locomotive Workshop Building the listing assesses Integrity/Intactness as *Bays 1 and 2 are largely unchanged from their mid-20th Century configuration*. This relative intactness is the reason that Bays 1 and 2 are currently set aside for heritage uses. They are currently two of 6 bays that have no mezzanine or obstruction to scale of the original bays. The current DA proposes to transform the current Exhibition Hall (Bays 10 – 13) into offices. This will leave Bay 1 & 2 as the only location where the original industrial grandeur of the industrial bays could still be experienced by a visitor to the site. An important element of Bays 1 and 2 is the operating blacksmiths and the CMP recognises the important role they play.

The current Locomotive Workshop CMP, with which Mirvac is under the covenant to comply, sets out the expectation for Bays 1 and 2 when it states that: *Consultants were engaged by ATPSL to review the present display situation in Bays 1 and 2 and propose a public display interpretation strategy for this area, in accordance with the broad intentions of the 1996 Management Plan. (page 63)*

REDWatch goes into this detail to show that when Mirvac purchased the site in 2016 it entered into arrangements to preserve and manage not only a heritage building, but also its highly important machinery collection, its active heritage and the important heritage Bays 1 and 2.

REDWatch submits that the incursion of the proposed loading dock for the proposed developments into Bays 1 and 2 stands to ruin the outstanding heritage significance of Bays 1 and 2.

REDWatch submits that Under Section 79C of the EP&A Act that Bays 1 and 2 are not a suitable site for the loading bay development proposed due to their high heritage significance. We further submit that the development of the loading bay will likely have a detrimental impact on the ability of Bays 1 and 2 to provide the heritage experience and interpretation the site needs to tell the story of Eveleigh and its industrial and social history, now and into the long term future.

Mirvac may argue that a supermarket is in the public interest and its loading dock should over-ride heritage and that this heritage impact can be mitigated. REDWatch contends that Bays 1 and 2 are so important (as shown by the state heritage listing and the heritage documents) and the damage done to the interpretation of this dedicated heritage space so great, that the loading bay in Bays 1 and 2 is not in the public interest because of its impact upon the heritage bays.

We do not object to the supermarket per say if Mirvac can find another location for it and its loading bay, but we do object to any proposal that has the main loading bay for the SSDAs in the highly heritage significant Bays 1 and 2.

What is preserved in the heritage bays and in the heritage listed collections at Eveleigh is there for future generations, not just for us. These SSDA proposals also raise issues of intergenerational equity. If parts of Bays 1 and 2 are allowed to be sliced off from heritage uses for commercial uses, (be it loading bay or the proposed commercial spaces), it makes it likely that these spaces will be lost to heritage use into the future. This is especially so now the site is in commercial rather than government hands.

The history of the ATP has seen consistent gradual erosion of heritage, either through neglect of parts of the moveable heritage or through the spaces for heritage interpretation being squeezed into smaller areas to increase the site's commercial yield.

In line with ESD objective of the EP&A act we submit that the ESD principle of intergenerational equity should apply alongside the precautionary principle and ask that this proposal be assessed with these principles in mind. The state heritage listing and the CMP are there to preserve and interpret an important state collection for both the present and future generations. Mirvac makes much in its proposal of how the development can be removed without impacting upon the building's heritage; however that question has also to be asked for Bays 1 and 2. Is it likely that if parts of these heritage bays are monetarised for non-heritage purposes they will ever return to spaces used to interpret the site's collections and history? If this erosion of heritage space is allowed it deprives future generations of its use to understand Australia's industrial and social history.

The Heritage Impact Statement makes it very clear what is driving the proposed redevelopment in Bays 1-4A. In the words of the HIS:

*The key impacts in Bays 1-4a relate to the cumulative impact of the chosen retail anchor – the supermarket, its associated loading dock and travelator. (HIS page 6) ... As a result, every effort has been made by the design team to reduce, offset and mitigate the cumulative impacts of introducing a supermarket, and its ancillary requirements, into Bays 1-4, where possible. (HIS page 7)*

REDWatch submits that the heritage interpretation should not be about mitigating the impact of the commercial development. REDWatch submits that any redevelopment of the Locomotive Workshop has to also deal equally with the moveable heritage, the heritage interpretation space of Bays 1 and 2 as well as the heritage interpretation across the Locomotive Workshops and the broader Eveleigh Railyards. Commercial development should not trump the heritage elements.

While the HIS makes many mentions of the desire to Mirvac's desire to encourage Cultural Heritage Tourism, the SSDAs do not detail how it might develop the heritage Bays 1 and 2 to provide a Cultural Heritage Tourism attractor. REDWatch submits that this DA is not just about commercial uses for the site with heritage deliverables as offsets. REDWatch submits that the SSDAs should equally address the potential of the collection and the spaces to deliver a best practice heritage experience that will attract Cultural Heritage Tourism which is strengthened by the site's central location with public transport access close to other tourist offerings. Heritage Cultural Tourism is very different to providing people with an incidental heritage experience when they come to do their shopping

Mirvac has argued that heritage is not currently a drawcard to the site. Regrettably, we agree. Over the time since the Workshops stopped their original rail functions, there have been many proposals for heritage interpretation however very few have ever seen anything implemented unless it was to increase the commercialisation of a part of the site. These SSDAs provide an opportunity to get heritage properly interpreted and to deliver on the heritage potential and aspirations for this site.

There is a danger however, that like earlier proposals, it will not come to actuality if they are not protected in the SSDAs' consent conditions. REDWatch hence submits that heritage deliverables be specifically conditioned in the final consents for these SSDAs.

REDWatch does not oppose the heritage possibilities raised in the proposal, we simply want to see the proposals for the heritage assets developed in their own right as a heritage attractor within the wider development rather than using the current approach of heritage interpretation mitigating the proposals impacts. We do not want to see the heritage possibilities being eroded by the proposed primacy of the commercial retail development.

We want Bays 1 and 2 to be the main heritage interpretation space on the site delivering best practice heritage interpretation. The site is about telling the Eveleigh heritage stories. Mirvac purchased the site knowing it had heritage obligations that could not be pushed into a corner to get greater commercial yield from the site. It is pushing that envelope to get the best commercial yield possible and with the community and heritage specialists REDWatch is pushing back to maintain heritage spaces, interpretation and to protect the heritage future of the site.

To this end we submit that Mirvac needs to come back with a modified proposal for Bays 1 and 2, without a loading dock, to give primacy to the heritage in this space. A modified proposal needs to address the challenge of how Bays 1 and 2 can be used as a drawcard for Cultural Heritage Tourism. Based on the initial application this proposal should retain the heritage blacksmiths but also include a resourced heritage repository as well as at least one active display and interpretation space for regularly changing heritage displays. To avoid the possibility that the display may become static, even though changes of display are proposed in the SSDA, we propose that the condition of consent for an active display requires a minimum of four (4) displays a year in this space.

The revised proposal for Bays 1 and 2 should explore how the space can be used without the disruption of key heritage assets in the Bays. The proposed SSDA for example separates the massive Davy Press from its furnace and relocates the overhead crane that linked both together. It also left no room for placing other tools and items used in this vicinity in proximity to these items.

From a Heritage perspective, REDWatch submits the key issues that need to be assessed in these SSDAs are:

1) **How does the proposal deal with the heritage fabric of the building?** – While some concerns have been raised, the proposal seems to address most of these issues with the exception of a proposed loading bay in Bays 1 and 2 and a travelator connecting the supermarket to the Building 2 car park which raises major concerns about how this might impact upon the unique subterranean structure of the workshops.

2) **How does the proposal deal with the active heritage uses as represented by the Blacksmiths?**

We support the proposal that the blacksmith space be continued and activity increased. However, the introduction of other retail uses into Bays 1 and 2 raises concerns of possibly conflicting incompatible uses being introduced that could threaten the ongoing operation of the active blacksmiths. In REDWatch's view any retail use in this space should be conditioned to be related heritage purposes or to supporting or complimenting the heritage activities in Bays 1 and 2. The SSDA should also be conditioned so that the proposed opening up of the central corridor can be closed to provide sound, smell and particulate separation between the noise and grit of blacksmithing, and the requirements for a supermarket and food handling. The resolution of the potentially conflicting uses proposed needs to be conditioned so that the operation of the blacksmith space is not impaired in the case of conflicting uses. Under no circumstances should the proponent be allowed to address conflicting uses by erecting a barrier within Bays 1 and 2 to endeavour to confine the blacksmiths impact to half of Bays 1 and 2.

3) **How does the proposal deal with the moveable heritage collection?** – As we have said the state heritage listing at the Locomotive Workshops is not just about the building but about the significant collection of industrial machinery that Mirvac inherited responsibility for as part of the site purchase. How these items will be accessible and used to tell the story of the processes, people and social history of the site is as crucial as how the DA deals with the heritage building fabric. How the machinery collection is used for interpretation needs to be on table before a final assessment is

made to avoid the possibility that the difficulties of dealing with the size or aspects of the machinery collection would see them sidelined in the push for maximum commercialisation of the space they should otherwise occupy. There is an indication in the SSDA that some material will be put into storage rather than displayed all the time at the site – this was a concern raised when the site was sold. There was a strong community view that all equipment in the collection needed to remain accessible. REDWatch supports the heritage items being placed in their original bays or locations to tell the story of Eveleigh, its workers and the manufacturing processes. Assemblages must be interpreted together to tell their stories and must not just be used as industrial age sculptures. REDWatch does not support parts of the heritage collection not being publically accessible.

**4) How does the proposal deal with the heritage space in Bays 1 and 2 which are available to tell the story of Eveleigh?** While the active area seems safe in the short term the balance of Bays 1 and 2 has been set aside for a loading bay to service the site and the supermarket and for two retail spaces. The proposal has a major impact on the interpretation of the Davy Press and oven, and leaves little ground level space to tell the Eveleigh heritage story and to create a heritage drawcard. A heritage centre above the loading bay seems inadequate compensation for the otherwise accessible heritage space taken by the loading bay. While the heritage story should be told across the site it is not an alternative to a dedicated heritage space in Bays 1 and 2. We have covered aspects of this issue above in some detail.

**5) How does the proposal deal with the social and labour heritage of the site?** For some time Heritage practitioners have been arguing that there needs to be a centre at Eveleigh, which can act as a repository for worker and social history for Eveleigh. We welcome the indication in the current proposal that this might be possible, however note that there is no real detail or commitment to such a repository contained in the current proposal. There is no clear plan in the proposals for how the social and labour heritage will be interpreted. This has to be covered by the SSDAs consents. REDWatch submits that Mirvac needs to address the heritage impacts of its SSDAs and bring back an amended proposal that incorporates a robust heritage proposal for how the site will promote heritage and fulfil the potential of its heritage listings and its heritage documents.

This DA will determine the future of Heritage at the Locomotive Workshop. It will determine if the Heritage potential is tapped so people with a heritage interest will want to come to the site for its heritage interpretation or if the heritage becomes primarily the ‘public art’ sculpture backdrop for the new commercial and retail precinct. There is much more at stake here than in the redevelopment of a heritage building, here there is active heritage, the machinery and a heritage dedicated space that need to be also appropriately handled in the DA. The question for us all is – Has this DA done that or does the balance between commercialising space and the heritage deliverables need to be adjusted? REDWatch is arguing that the heritage aspects need to be revisited and dealt with in their own right rather than as an offset to the impact of the retail uses proposed.

On the non-heritage side REDWatch wishes to comment on a few other aspects of the SSDAs.

While the proposal talks about it activating Innovation Plaza the location of the proposed loading bay places truck access through the main public plaza. The plaza is also a key element of the public domain access to Redfern Station. Pedestrian movements will clash with truck movements not only for some of Innovation Plaza but also in the pedestrian path between the National Innovation Centre and the former Works Managers Office.

The proposal does not assess the increased pedestrian usage expected by the proposed activation of Innovation Plaza nor the current or projected cumulative pedestrian activity through this part of the

site heading to and from Redfern station after this last piece of the proposed redevelopment of the ATP.

Given that deliveries are proposed through pedestrian areas the SSDAs should have provided these assessments and evidenced how the conflicting uses would be handled with a reference to the Access covenants Mirvac entered into when purchasing the site. REDWatch submits that deliveries not be made in the manner proposed due to these pedestrian conflicts. All deliveries should be made via Locomotive Street where the conflict is handled by a designated pedestrian crossing.

We also note a potential conflict within the SSDA. One of the critical success factors identified by MacroPlan Dimasi (Appendix E) for the supermarket and retail was the need to provide connected car parking(EA page58). The traffic study indicates that there will be no increase in traffic as a result of the development because the supermarket will service local residents and those working on the site. Surely, the introduction of a significant retail use, while it might not increase the number of car spaces will increase the turnover within each of the retail parking spaces and therefore generate increased traffic both on weekdays and for the problematic weekend traffic.

Due to lack of time to both absorb the two SSDA application documents and to prepare this submission we are unable to provide further general comments.

We have focused on the crucial heritage issues raised by the SSDAs and we trust that the issues raised will be addressed in the final approval and its conditions.

Yours Faithfully

**Geoffrey Turnbull**  
**REDWatch Co-Spokesperson**  
c/- PO Box 1567  
Strawberry Hills NSW 2012  
Ph Wk: (02) 8004 1490  
Mob: 0401 529 931  
email: [mail@redwatch.org.au](mailto:mail@redwatch.org.au)

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