

RTBU RMA submission in response to Mirvac DAs for the Redevelopment of Eveleigh Locomotive Workshops

The RTBU RMA represents retired employees of the NSW rail, tram and public bus industries. The RTBU and its predecessor unions were active in the Eveleigh railway precinct including the Eveleigh Locomotive Workshops from the beginning of operations at the site to the cessation of operations. The Eveleigh Locomotive Workshops provided many officials and union delegates for the RTBU and the workshops were always well represented on the various governing bodies of the Union.

The RTBU RMA makes the following submission which addresses the Secretary's Environmental Assessment Requirements (SEARS-) **4 - Heritage** which are italicised below.

The RTBU RMA, before doing so, desires to indicate the broad framework in which we view the heritage of the Eveleigh Locomotive Workshops. Heritage legislation and experts have described these workshops as rare and exceptional. Since they were decommissioned in the late 1980s and the Australian Technology Park was established in 1996 there has been a succession of Government departments responsible for the site. This changed in October 2015 when the ATP site was privatised and sold for \$263 million to one of Australia's largest residential and commercial property developers, Mirvac.

The RTBU RMA argues that regardless of ownership the owner is the custodian of this heritage treasure for the people of NSW and the perspective that must be adopted in determining the Development Applications is: what legacy will we bequeath to future generations?

From our experience the corporate world is a tough environment with competition, mergers, takeovers and the ups and downs of both local and international economic cycles ever present. Few corporations have a life span of more than twenty years. In this environment, in our submission, a special onus attaches to the adjudication of Mirvac's two DAs for the Eveleigh Locomotive Workshops.

The RTBU RMA is concerned that the various Mirvac DA's in respect of intangible cultural history have resulted in *"Eveleigh's material culture has been disassociated from its social and labour history...the interpretation of working life at Eveleigh has been subordinated to the conservation of its material culture."*¹

It has been estimated that some \$70m of public money has been spent since the closure of the EWS in the late 1980s on the conservation of the built fabric and only a miniscule amount on the interpretation of social and cultural history. As Taksa observes *"Besides Eveleigh's major workshops and buildings, little evidence can be found of their social history"*.² The RTBU RMA argues that a funding plan for heritage interpretation needs to be given a high priority

¹ Lucy Taksa: *Machines and Ghosts: Politics, Industrial Heritage and the History of Working Life at the Eveleigh Workshops*, Labour History, Number 85, November 2003

² Op Cit p83

Eveleigh's social and cultural history were addressed at length in the CMP and the ERWS IP, 2012 however they have been severely diluted in the various Mirvac heritage interpretation strategies including the current DAs.

The RTBU RMA has previously made two submissions in response to the three previous Mirvac Heritage interpretation Strategies. The Association indicates that many of the arguments and recommendations contained in those submissions bear directly on the current SEARS Heritage requirements.

RTBU comments on various SEARS Heritage requirements

- *“Addresses the impacts of the proposal on the heritage significance of the Locomotive Workshops and Eveleigh Railways Workshops”*

The RTBU RMA submits the two DAs fail to address the impacts of the proposal on the heritage significance of the Eveleigh Railway Workshops because:

- a. They fail to address the Conservation Management Plan, the Eveleigh Railway Workshops Interpretation Plan, Heritage Asset Management Strategy and Moveable Collection Management Plan in their entirety and only selectively refer to these documents in Appendix M Heritage and Archaeological Statements Parts, 1, 2 and 3.
- b. The HIS fails to address the precinct-wide Eveleigh Railway Workshops Heritage Plan as outlined in the CMP and supports a precinct-wide consultative mechanism which only includes landholders and specifically excludes community organisations that have been the backbone in driving heritage interpretation for over twenty years. The RTBU RMA argues there has been a governance failure which has resulted in a failure to deliver precinct wide heritage outcomes. The RTBU RMA made a submission to Urban Growth about precinct wide governance issue but received no feedback or notification of what the outcomes of the review were.
- c. The Association argues there are many examples where the DAs do not address the CMP or ERWS IP or are so ill defined that there is difficulty ascertaining whether or not there is genuine support for many of the proposals contained in these documents. This submission analyses two examples of heritage interpretation which substantiate our argument.

Our submission firstly analyses the history of the **Workers Wall**.

1. ATP CMP December 2013. At 8.5.4 The Eveleigh steering Committee identified the following key issues and considerations for the former railway workshops including
 - A workers wall

2. The workers wall was referred to in the ERWIP in the following terms:

“A large scale interpretative artwork is proposed that combines the names of workers who were severely injured or killed in industrial accidents at ERW 1881-1889 with the name so the 65 plus trades performed at ERW. Additionally this artwork could be extended to include all those employed at the ERW depending on surviving staff records and research resources. To create the desired effect and legibility for on-site visitors and perhaps even passing train

passengers this artwork would need to be at a very large scale and might be incorporated into the site landscaping works."

3. Heritage Impact Statement ATP Redevelopment, December 2015. This document included: **Appendix 1: Summary of development against Heritage Policies for the ATP Site.** In relation to the Workers Wall it said:

Constraint/Requirement: quotes from CMP as referred to above which included a workers wall.

Will the Proposed Mirvac Redevelopment comply? Interpretation implemented as part of the Mirvac redevelopment of the site will be able to ensure compliance with the key considerations raised by the Taskforce and Eveleigh Steering Committee.

Potential impact: Comprehensive and engaging interpretation implemented within the ATP site (to be refined through the final interpretation plan) including management of the moveable heritage collections, links to other rail heritage places, will be a positive impact for the heritage significance of the site.

Comments. NA

4. Interpretation Strategy for Australian Technology Park, September 2016. This document included at p43 *Table 1: Summary of Proposed Interpretative Works for the ERW Site (from 3D Projects 2012 from the Previous IP.* In relation to the Workers Wall it said:

Description. Quotes from ERWIP IP

Proposed location in the 3D projects Location Report. Flexible

Comments /opportunities: potential to incorporate into landscaping as a public artwork with one of the public domain areas. Not necessarily need to be on such a large scale as proposed. Opportunities to incorporate into the Public Domain through paving or the like.

Timeframe Considerations: could be considered during ATP interpretation. Potential locations in Public Domain areas.

5. ATP Redevelopment SSDA7317 JBA –response to public submissions

Item raised. Suggestion to construct a Commemorative Workers Wall at Eveleigh with space and resources to remember the working lives of the working men and women who worked there the 1880 and the late 1980s.

Proponents Response. This had been identified as an option in pre-existing documentation and will be considered as part of a suite of interpretative options as part of the interpretative planning process.

6. Mirvac DA Locomotive Workshops Redevelopment, November 2017. Appendix M Heritage and Archaeological Impact Statement, Part 3 November 2017. At p43 it repeats the comments made in the November 2016 HIS referred to above. At p54 reference is made to the Midlands workers wall. At P106 it says "a public art strategy has been prepared for the

Mirvac redevelopment of the ATP site...development of appropriate concepts and locations for public artwork would require additional consultation with Mirvac, the local community, and FJMT/Sissons in collaboration with Aspect. However, artworks could potentially incorporate such things as ... Workers Wall."

RTBU RMA Comments: Mirvac have since December 2015 put forward four Heritage Interpretation Strategies and various comments about a Workers Wall. In our view they have been inconsistent, open ended, lacking conviction and non-committal as to what type and scale of wall, seeing it as an option or being potentially incorporated.

The RTBU RMA makes the point that workers and their reps have been particularly influenced by the advocacy and articles in support of the Workers Wall by Professor Lucy Taksa and have been involved in the proposal from day one, but have not been included in discussions about strategies for public art strategy or public domain. The consultation process with unions and retired workers has to be inclusive and holistic. In these DAs, from our perspective this has not occurred, and this is consistent with the RTBU RMAs comments made in earlier submissions about the shortcomings of the consultation process.

Archive & Research Centre

The RTBU RMA has also undertaken a review of the comments that have been made in various documents and heritage interpretations statements about an Archive and Research Centre.

1. Eveleigh Railways Workshops Interpretation Strategy, 2012. At section 5.4.1" *Archive and Research Centre. It is proposed that copies of all existing and future ERW –related published histories, heritage studies and masterplans, oral history recordings, and transcripts, artefact inventories, site plans, photographs and original ERW on site archival ephemera are collected and stored centrally, preferably on site at the ERW, for easy access by government agencies and government staff and consultants, as well as historians and general researchers by appointment. Consideration should be given to accommodate an Archive & Research Centre that might double as a suitable ERW location to accommodate an Archive & Research Centre that might double as an ERW Visitor Information Centre. "*

2. Interpretation Strategy for Australian Technology Park Draft Report September 2016 at p46 it says:

"Archive & Research Centre: 3D interpretative element. Description: All existing and future ERW related publications to be collected, collated and stored centrally, preferably on site at ERW within an Archive & Research Centre that could double as an ERW Visitor Information Centre. Proposed location: none proposed

Comments/opportunities: ATP buildings are privately owned which is not commensurate with suggested use of the site for a public Archive and Research Centre. Timeframe Considerations: not proposed for this project."

3. Mirvac DAs for the Redevelopment of the Locomotive Workshops .Appendix M: Heritage and Archaeological Impact Statement Locomotive Workshop (Bays 1-4a), November 2017.

At p9 it says *“the loading dock has created the most negative impact in terms of changes to space...in order to offset and help minimise the visual impacts associated with creation of the loading dock, the following heritage initiatives have been proposed including: a dedicated heritage exhibition space (not static), and archival repository, to be located within the mezzanine above the loading dock”*

RTBU RMA Comments

The approach of the company to this interpretative element has certainly oscillated wildly. The latest proposal for the Archive /Research Centre has a number of characteristics

It is described, as an offset for a loading dock, hardly a ringing conceptual endorsement but certainly an improvement upon the previous position.

Secondly, it is proposed to locate it above a loading dock. One would be hard pressed to suggest a more inappropriate location for such a centre.

Thirdly, the original interpretative concept now has the title of archive/repository. At face value this is distinctly different though the company has not approached the unions/ retired members to discuss what they have in mind and this should occur at the earliest opportunity. A general conclusion at this stage is that we are a considerable distance away from achieving what was contained in the original interpretation strategy for the EWS.

The RTBU RMA has not had time to make a detailed examination of the history of all the interpretative elements as set out in the CMP and ERWSIP but makes the comment that these foundational documents have not been complied with. The RTBU RMA's submissions in the earlier DA analysed in some considerable detail the interpretative elements set out in the CMP/ERWSIP. They are included as an Appendix to this submission.

The RTBU RMA recommends that the development consent not be granted until an independent audit commissioned by the Department of Planning and Environment examines and reports upon the failure to implement the CMP and ERWS IP in the DAs.

- *“Addresses the cumulative heritage impacts of the proposal on the Eveleigh railway workshops considering the other projects occurring in the ATP component of this State Heritage Register site”;*

The RTBU RMA argues the HIS fails to adequately address this point because:

- a. The dramatic decrease in the area devoted within the workshop to heritage interpretation e.g. over recent years the area for heritage shrunk from Bays 4 and 3 to the present 1 and 2 and the proposal in the DA is to have two half bays in 1 and 2. This will lead to the destruction of the original scale and space of Bays 1 and 2 and combined with Bays 9-13 being altered to commercial premises it removes from the Locomotive Workshops completely the only remaining exceptional spaces precluding any future

appreciation of the original architectural and engineering intent of the Workshops. The RTBU RMA argues this is an unacceptable outcome.

The RTBU supports the consolidation of blacksmithing and the reactivation of some blacksmithing equipment. We are concerned that the heritage base of the Locomotive Workshops is becoming too reliant on the blacksmithing activity and that the integrity of the Moveable Heritage Collection and the Intangible Cultural and Social Strategy are being downgraded.

In our submission, the applicant's vision for the future heritage of the Workshops will not be realised by the current HIS. This vision, as outlined, is to be: an international drawcard for tourism; to provide a complimentary site to Carriageworks; and for the heritage value of the site to be *"unlocked through retail visitation"*.

For example, heritage tourism for the Workshops has been bandied about for over twenty years yet no plan exists as to how this objective may be realised. Discussions with a consultant do not constitute a plan. In our submission the question that needs to be addressed in our view is: what heritage plan for the Workshops would enable the three aspects of the vision to be effectively realised?

The RTBU RMA notes that the Workshops Managers Office, the New Locomotive Centre the Timekeepers Office and the Large Erecting Shop has not been included in the HIS for the Workshops or the overall ATP site. This should be remedied.

When the floor space allocated to heritage conservation and interpretation in the proposed DAs is compared to the total floor space at the ATP, it is clear that heritage interpretation is now marginal.

- b. The RTBU RMA argues the process of having a staggered series of DAs submitted has had an adverse impact on heritage interpretation. The first DA for the three new commercial multi-storey buildings had a number of vague suggestions about heritage interpretation e.g. foundry and children's playground heritage interpretation. Running alongside these applications a public art strategy is being prepared and a public domain strategy. No consultation has occurred with union representatives in respect of either of these strategies.

These current development applications, if agreed to, will have many impacts on heritage e.g. the effective closure of the main exhibition space in Bays 9-13 for commercial development for one tenant; the allocation of half of Bays 1 and 2 for retail, a loading dock in Bays 1 and 2 will foreclose some heritage interpretation opportunities e.g. Davy Press and forge, significant diminution of the moveable heritage collection and many vague as yet to be detailed cultural heritage interpretations. In addition, there is future DAs to come.

The RTBU RMA recommends a holistic approach be taken to heritage interpretation as the current incremental approach renders it impossible for the community to obtain an overall understanding of what is proposed for the entire ATP site. Our concern is that

the current path of multiple DAs dictated by the applicant's commercial and retail requirements will lead to a sub-optimal heritage outcome for the people of NSW.

The RTBU RMA recommends that Development Consent include conditions to ensure Bays 1 and 2 are exclusively devoted to heritage interpretation.

- *"Demonstrates consistency with Heritage positive covenant."* The RTBU RMA notes that the Heritage Positive Covenant was developed as an integral part of the ATP sale process by the NSW Government and has two major components. The first relates to the various heritage documents already referred to and the second is that *"the proprietor must comply with NSW Heritage Act and in particular all obligations under s170A as if the proprietor was a government instrumentality."*

The RTBU RMA in point one above has called for an independent assessment of the application of the Covenant. The RTBU RMA further recommends that this audit include the second part of the Covenant referred to.

- *"Assesses the impact on any aboriginal and non-aboriginal archaeology and outline any proposed management and conservation measures to protect and preserve archaeology."*

The DAs addresses in considerable detail the potential for aboriginal archaeology and concludes it is most unlikely that there is any material on the site.

In an earlier DA reference was made to the demolition of the remnant foundry walls and the potential for these to be used in heritage interpretation e.g. a workers' wall which recognises past employees of the Locomotive Workshops as has occurred at the former Midland Railway Workshops in Western Australia. No references are made to the remnant walls in this DA and the accompanying HIS.

This DA proposes that as part of the travelator tunnel from the basement of building 2 to the proposed bay 4 supermarket there will be a heritage interpretation of an object found in the excavation of building 2 where the foundry was once located. The object is a pipe and on any reckoning it would be nigh impossible from a moving travelator to identify it with the operation of the foundry. Unions have suggested that an imaginative heritage interpretation strategy for the foundry would be to recreate the noise, smells, sparks and molten metal in an industrial environment where the many skills of the workers are exhibited.

The RTBU RMA recommends that the Workers Wall, Archive and Research Centre and Foundry interpretation be included in the Heritage Interpretation Strategy and these be included in the conditions of consent.

- *"Addresses the impact to moveable heritage items and in situ machinery, and conservation and management measures to ensure protection of significant objects".*

The CMP indicates that the significance of the machinery displayed in the Locomotive Workshops (except Bays 1 and 2) is high.

In our submission the point needs to be borne in mind this is a collection, the sum of the parts. In addition, due to the fact that over many decades the *in situ* components of the

machinery collection have changed locations as the work requirements altered, making it difficult to allocate machinery to a specific functional location.

Governments and managements in the past have failed to address a number of issues including location and context of the collection, how different machines relate to each other, the role and skills of workers in the multiplicity of industrial classifications who operated the machines and where various items of machinery fitted into the overall production process within the Locomotive Workshops.

The RTBU RMA notes that the 2012 Eveleigh Workshops Interpretation Plan provided, in order to assist visitor orientation, an eight-metre showcase that displayed a general cross section of the Workshops. The last HIS argued this proposal was not feasible as the future of Bay 8 was not known but that it may go forward in a much-reduced scale and potentially be considered for Bays 1 and 2. Neither the original proposal nor its suggested variation has found its way into the updated HIS. The RTBU RMA recommends the proposal be reinstated and be included in Development Consent Conditions.

The RTBU RMA argues a number of the proposals concerning the Moveable Heritage Collection will individually and collectively have an adverse impact on the machinery collection though at this stage the full impact is difficult to assess with precision. For example, the proposal for several non-blacksmithing items in Bays 1 and 2 to be relocated; the suggestions for the CBA to obtain parts of the machinery collection; the spring shop machinery items being relocated and the indications that part of the collection in Bay 9 would be effectively closed to the public and with other machinery components of Bay 9 possibly forming part of new apprenticeship training arrangements at Chullora.

The RTBU RMA argues the cumulative impact of these proposals will significantly diminish the value of the machinery collection.

Throughout the DAs comments was made that the fit outs of various bays and retail annexes could be easily reversed if, for example, in 30-40 year time changed circumstances/or owners eventuated. This is not the case with the moveable heritage items and *in situ* machinery as once it is fragmented, the impact on the Collection will be irreversible.

The RTBU RMA recommends that a condition for development consent be inserted requiring the moveable heritage collection be kept intact within the Workshop and that the issues surrounding the collection be the subject of investigation by an independent expert familiar with the collection.

- *"Addresses the impact to the industrial character of the building."*

The decision to locate a larger and additional supermarket to Bay 4 within the Workshop will have major impacts for the industrial character of the building, in particular, the aspects relating to the travelator and the loading bay adjacent to Innovation Plaza. Both are recognised as major changes to the building. The travelator is in scale, location and fabric totally inappropriate to an internationally recognised heritage building described as rare and exceptional.

The supermarket proposal involves the construction of a loading bay in the north east of Bay 1, fronting onto Innovation Plaza. The loading bay will be large enough to accommodate several trucks. It not only will have a major impact on the industrial heritage of the building but on the sight/viewing lines from the north, pedestrian safety in the busiest pedestrian thoroughfare in the ATP precinct and the amenity of Innovation Plaza. It will also impact on the application of the HIS strategy e.g. the inclusion of the loading bay leads to a significant decrease in heritage interpretation space.

The proposal in the DA that the impact of the loading dock on the building fabric could be “offset” to help minimise the visual impacts of the loading dock by several revised interpretation strategies is rejected as the interpretative elements in our submission should be included as of right as set out in the CMP and ERWS IP.

Another seemingly implausible suggestion in the DA is for the potential establishment of an archives centre above the loading bay at mezzanine level. Our submission fully supports the principle for the establishment of an archives/research centre, but further discussion needs to occur as to the location, function and physical details of such a centre.

Our understanding of loading and unloading requirements for the commercial and retail proposals within the Workshop is that they could be accommodated by the various loading bays that currently exist on Locomotive Street.

The RTBU RMA is also concerned that the multiple company logo/brand signs proposed for the length of the southern side of the building facing Locomotive Street will adversely affect the industrial character of the building.

The RTBU RMA recommends that the DA not be allowed to proceed with plans for a travelator, loading bay and multiple commercial/retail signages as they will severely impact on the industrial character of the Workshops.

- *“Considers opportunities for heritage interpretation within the public domain including the relationship with and any updates required to the interpretation strategy.”*

The RTBU RMA is unsure about the reference in this SEARS requirement to public domain as generally it has been used in this DA to refer to the area outside the workshop though of course public domain extends to the fact that significant parts of Bays 5-15 will be private tenant accommodation with parts of the machinery collection only very occasionally available to the public, and of course the vast industrial areas currently comprising Bays 9-13 will be removed to accommodate a single commercial tenant and thus not available to the public.

Reference is made in the DA to Red Square, a unionists’ meeting place for many decades. Various unions have made suggestions over the years to include this location as part of cultural and social heritage even though as part of this DA process no discussions have been held with retired workers or unions. From our perspective, the proposal fits squarely within the broad canvas of intangible cultural heritage.

The RTBU RMA notes the interpretation strategy endorsed by the Heritage Council of NSW is the Eveleigh Railway Workshops Interpretation Plan, 2012. The applicant has put forward a Heritage Interpretation Strategy which has been criticised at some length in previous union and community submissions as being substantially different to the endorsed 2012 strategy in that many components of that strategy have been omitted from the current HIS or substantially altered.

Mirvac refers to several examples of adaptive reuse of industrial sites in Sydney and elsewhere to demonstrate its capacity and understanding of the challenges at the Eveleigh Locomotive Workshops. But there are three components we see to the heritage values – the buildings, the machinery collection and the workers and communities who brought the site to life. The examples put forward by Mirvac are only plausible in relation to the buildings component. They are a serious threat to the commitment made by NSW to maintain the heritage values at Eveleigh and justify a careful, determined and independent assessment of the DAs now under consideration.

In our view many changes need to be made to the applicant's Heritage Interpretation Strategy. The RTBU RMA notes the heritage subcommittee referred to in the application and the high-level design strategy committee has not involved consultation with unions and retired workers and this is of real concern to our organisation and should be addressed. For example the Portraits proposal is a long standing one which goes back CMP and ERWIP and will involve former RTBU members. The unions /retired workers should have been consulted in all aspects including location and this and other items being categorised as offsets for a loading bay. In earlier HIS Responses the RTBU RMA was extremely critical of the Mirvac consultation. Our concern has not diminished with this HIS process. The RTBU RMA attended two "*consultation*" meetings in which very generalised information was referred to. The RTBU RMA asked for a copy of the presentations made which was refused. In addition the RTBU RMA emailed a list of questions to Mirvac and the receipt of these were neither acknowledged nor responded to.

The Eveleigh Stories collection is currently superintended by Urban Growth and has not been substantially added to in recent years. This is one of a number of issues where fragmentation of the heritage interpretation strategy has occurred. In our view detailed consideration needs to be given to the future development, funding and ultimate superintendence of Eveleigh Stories. What vision and plans does Urban Growth have for Eveleigh Stories? Would it not be best located in an Archives/Research Centre located in the Workshops?

The RTBU RMA recommends that the Heritage Interpretation Strategy be updated to include: the reinsertion of many of those interpretation strategies removed from the 2012 Interpretation Plan; a section on the 1917 Great Strike and which originated at Eveleigh Workshops and the Centenary of which has been widely celebrated this year, and the change in custodianship of the Eveleigh Stories Collection and its relocation in the Workshops, preferably within an Archives and Research Centre.

Appendix 1. RTBU RMA Analysis of the implementation of heritage interpretation strategies as set out in the CMP and ERWS IP as detailed in our submission to the Mirvac September 2016 HIS.

Previous Strategies

The ERWIP, 2012 proposed 12 possible interpretative works across the ERW site, (3 applied to Carriageworks). It also included potential opportunities for works within the public domain, heritage demonstrations and events, as well as collections management and maintenance.

The Draft IP sets out what Mirvac proposes to do with these 12 interpretative elements.³ For all intents and purposes, as set out in the analysis below, the 2012 ERW IP has been disembowelled.

³ Op cit p40 Table 1: summary of proposed interpretative works for the REW site (from 3D Projects 2012) from the previous IP 1. ERW Heritage Route. Not at this stage. If implemented would need to take place after the development of all precincts in the ERW. 2. Interpretation zones and signage clusters. This is part of 1 and as 2 zones are within ATP not possible at this stage. 3. Relics Showcase. Provides general visitor orientation, with 8 metre showcase that displays a general cross section of ERW and located near centre of Bay 8. Argues not feasible, future of Bay 8 not known, at a much reduced scale consider the potential of a relics showcase for Bays 1 and 2. 4. Plan. A large format digital reproduction of an historic ERW plan in glazed aperture in Bay 8. Consider in areas outside of the Locomotive workshops through this interpretative plan DA. 5. Ghosts: a large scale floating artefact and audio-visual installation which explores the site through an array of personal stories and experiences of the place's past inhabitants. Response: rationalised concepts to be considered in conjunction with wider precinct... consider holographic projection. 6. Portraits. 25 glazed panel screen, Bay 1. Response could be considered outside workshops if part of this DA or if Loco workshops subject to future DA. 7. Bridge: two pedestrian / cycle bridges connecting North and South Eveleigh. Unable to address at this stage. (Refer to Urban Growth Report. Mirvac says "*currently investigating available options with landowners and government agencies.*" (Elements 8, 9, 10 not included or overlooked) 11. Workers Wall: a large scale interpretative artwork recording names of workers at ERW 1887-1989 or at least those that were killed or injured, location flexible. Could be considered during ATP interpretation in public domain areas. Though "*not necessarily need to be on such a scale or incorporate into paving.*" Other potential opportunities, Signage: could be considered. Audio guides GhosTrain audio project (5-part sound sculpture). Response: are of self-guided tours and use of apps including Eveleigh Stories. May not necessarily be in the form of GhosTrain, potential to be considered as part of stage 2 interpretation.

Flyer, Webpage and Guidebook. Response: not proposed for this project arguing "*outdated method of interpretation for this digital age*". Archive and Research Centre: proposal: all existing and future ERW related publications proposed to be collected and stored centrally,

Research centre that could double as an ERW Visitor Information Centre. Response: ATP buildings are privately owned which is not commensurate with suggested use of the site of a public archive and research centre, not proposed for the project. Recycling, Site materials and artefacts: proposed recycling of structural elements and materials for future ERW landscaping and public artworks. Response: could be considered during ATP interpretation.

The RTBU RMA recommends that the draft IP proposal for the interpretation elements for the ELW be rejected and subject to independent analysis and report by the NSW Heritage Council.

preferably on site at ERW, within an archive and research centre that could double as an ERW Visitor Information Centre. Response: ATP buildings are privately owned which is not commensurate with suggested use of the site of a public archive and research centre, not proposed for the project. Recycling, Site materials and artefacts: proposed recycling of structural elements and materials for future ERW landscaping and public artworks. Response: could be considered during ATP interpretation. Killed or injured location flexible. Could be considered during ATP interpretation in public domain areas. Though *“not necessarily need to be on such a scale or incorporate into paving.”* Other potential opportunities, Signage: could be considered. Audio guides GhosTrain audio project (5-part sound sculpture). Response: are of self-guided tours and use of apps including Eveleigh Stories. May not necessarily be in the form of GhosTrain, potential to be considered as part of stage 2 interpretations.

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