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Department of Planning, Industry and Environment

via Planning Portal

Dear Mick

New Request for Advice - Redfern Station Upgrade - New Southern Concourse

Thank you for your correspondence dated 26 May 2020 which invites the City of Sydney Council (the City) to provide comments on the proposed upgrades to Redfern Station including the construction of a new concourse and associated public domain works.

The project aims to improve the customer experience within the Station precinct primarily by improving accessibility within the station with the provision of additional lift and stair access points to platforms. In addition, this project will improve access and provide additional transport benefit to the wider community by upgrading the existing transport infrastructures and constructing new infrastructure to be integrated with surrounding transport facilities.

A number of design options were investigated that tested different elevated concourse locations and pedestrian movements which resulted in the most effective option being Option 1. Option 1 utilises the existing warehouse building at 125-127 Little Eveleigh Street as a new entry, bike storage and sanitary facilities and extends to the south to Marian Street where an additional pedestrian entry will be located over part of an existing carpark. Option 1 also includes extending the existing shared zone along Marian Street and creating a new shared zone along Little Eveleigh Street.

The City has reviewed the SSI application and supports the proposal in principle. It is noted that although many potential short- and long-term impacts have been considered, it is difficult to provide specific and constructive comments on design, heritage conservation and improvements to pedestrian movements and public domain as the EIS focusses mainly on strategy and lacks the inclusion of technical drawings.

The City raises the following areas for consideration.

1 Urban Design

As discussed above, it is difficult to provide any constructive advice regarding the design of the building without a set of detailed drawings. Overall, the City is generally supportive of the design direction. More information is required to describe the interfaces with the public domain, particularly at the Marian Street end of the concourse, where no elevations are provided.

A subsequent meeting between City staff and the project's architects would also assist in the review of the design documents.

2 Landscape character

Overall, the City raises no objections to the landscape works and agrees that the quality upgrade to Little Eveleigh Street will be beneficial. It is unfortunate that the extent of works does not facilitate a broader landscape overview. At the Marian Street entrance this becomes apparent in the coming together of incongruous paving materials between Cornwallis Street and Marian Street. An upgrade to the Cornwallis Street paving would enable the pedestrian environment to read as one, however, this is beyond the designated site boundary so will remain as is. This is a sub-optimal outcome from an aesthetic, urban design and wayfinding perspective.

2.1 Tree removal and offset vegetation

It is noted in Section 7.2 of Appendix C in the submitted EIS that mitigation for tree loss is covered by the use of offsets where other documents in the EIS refer to no net tree loss. It is also noted that an Arboricultural Preliminary Report or Arboricultural Impact Assessment has not been submitted for review.

The City acknowledges the need for the pruning or removal of vegetation to facilitate construction, however, it is recommended that the project provide a necessary and significant contribution to canopy cover (which is Sustainable Sydney 2030 target and a Premier's Priority). Although the use of offsets might be appropriate in other state-significant developments, a baseline of no net tree loss should be established here as State-owned sites contribute to canopy and microclimate within the City. Further, the removal of trees with a Medium-High Retention Value Rating is not supported by the City.

The removal of street trees and other vegetation would be offset in accordance with *'Transport for New South Wales Vegetarian Offsets Guide 2019b, or current equivalent'*. The EIS further provides an offset ratio for tree removal based on the size of the trees Diameter at Breast Height (DBH). This ratio however, does not state the size, species or location of the replacement tree plantings.

The City recommends all replacement tree planting provide a minimum of 60% canopy coverage on the surrounding streets or monetary compensation to the value/ significance of the removed trees which would fund the City establishing similar trees in the public domain surrounding the Redfern Station precinct. This is to be negotiated with Council during the detailed design stage.

Although there is limited space for additional trees within this project, further tree planting could be accommodated (and is encouraged) within the carpark off Ivy Lane/Little Eveleigh Street. This would reduce the temperature of the car park surface as well as that of parked cars and contribute to canopy cover. As a guide, it is recommended that all surface car parks provide one tree per four parking bays in addition to perimeter planting.

The protection and retention of all existing street trees and medium to high valued trees is a priority for the City. Trees are long term assets that the community highly values. The proposed upgrading of Redfern Station, a new southern concourse and potential ancillary facilities in the vicinity of trees including street trees has a high potential to impact in their health and structure. The City of Sydney Street

Tree Master Plan includes general street tree protection measures and conditions that must be followed. See Section 8 of the document linked here, http://www.cityofsydney.nsw.gov.au/data/assets/pdf_file/0010/130240/STMP2011_150501-PartD.PDF

Existing street trees and medium to high valued trees must be considered during the development of detailed designs for these works. In accordance with AS4970-2009 Protection of Trees on Development Sites, a Project Arborist must be engaged to assist with tree management advice during the various stages of the design and construction process. The Project Arborist should be qualified in arboriculture to Australian Qualifications Framework (AQF) level 5 or above and have at least 5 years demonstrated experience in managing trees within complex development sites.

Advice must be sought from a Project Arborist (AQF Level 5 Arborist) regarding the likely impacts to the trees and how best to manage and minimise these impacts when working within structural root zones or tree protection zones. Prior to construction works commencing, the Project Arborist is to provide tree protection measures relevant to the specific works and site conditions. The measures must be documented on relevant plans and form part of the site induction for construction works. Ongoing site supervision and advice shall be provided by the project arborist to ensure the any impacts to tree health and structure are minimised.

3 Public domain works

The City is generally supportive of the proposed public domain works as detailed in the submitted EIS. Separate approvals are required to complete any works within the public domain including along Little Eveleigh Street and Marian/Cornwallis Streets. These aspects of the proposal are discussed in further detail below.

3.1 Shared Zone Little Eveleigh Street

The proposal involves the establishment of a shared zone in Little Eveleigh Street which is currently a one-way street from Lawson Street to Wilson Street. Any proposed shared zone needs the approval of the Roads and Maritime Service through the Local Pedestrian, Cycling and Traffic Calming Committee (LPCTCC). A shared zone would require significant changes to the public domain including pavement finish, lighting and drainage which would need to comply with both the Public Domain Manual and the City of Sydney Technical Specifications as well as being subject to a separate approval under Section 138 of the Roads Act 1993.

3.2 Marian/Cornwallis Street

The proposal involves the construction of a new station entrance at the Marian and Cornwallis Street intersection. This location recently received significant pedestrian connectivity works involving pavement reconstruction and realignment of pedestrian paths. It also involved the establishment of an extended shared zone from Gibbons street along Marian Street and Cornwallis Street. During these works an old road pavement deemed to be a relic under section 146 of the Heritage Act 1977 was uncovered, marked and covered for heritage purposes. Chapter 14 of the EIS addresses Non-Aboriginal heritage impacts and although this area of Gibbons Street, Marian and Cornwallis Streets falls within the identified project area, the issue of this buried road pavement appears not to be addressed. As it was identified as part of previous approved public domain upgrade works it is

appropriate that it is identified for future consideration in any application for future public domain works.

4 Social impacts

Overall, the project increases equitable access to public transport for everyone. It is considered that the appropriate social impacts have been presented as part of the EIS and social impact assessment.

4.1 Access considerations during construction period

The majority of adverse social impacts will be evident during the construction phase and therefore ongoing communication with local residents, businesses, workers, the Aboriginal and Torres Strait Islander population and students will be key to limiting these potential impacts. It is recommended that the communication of information during temporary shut-down and construction periods are accessible and available in a variety of formats to ensure people with disability and those with access requirements are able to understand when and where construction is taking place and how this may impact their journey. This communication should include a contact number so that people with disability are able to directly contact someone at Transport for NSW (TfNSW) should they need any further information.

It is recommended that temporary wayfinding signage during construction and permanent signage be developed to ensure access to the site and navigation around the broader area is maintained as best as possible. It's important that adequate signage is installed during temporary road closures/diversions to ensure that people with disability or those with limited mobility are informed of alternative, step-free routes. Signage should be easy to read, help people to orient themselves, direct people to the accessible, step-free path of travel and indicate (in metres) the travel distance.

To assist people with disability to navigate the station during construction it is advisable that TfNSW consider placement of staff attendants. Staff should have necessary accessibility training to ensure that they are able to assist people with disability. It would also be beneficial to have staff located near the new entrances after the construction period to assist people to navigate and orient themselves within the new space.

The EIS also notes that the informal drop-off points at Marian Street and Little Eveleigh Street, which have continued to receive increased usage by people accessing the station, will be impacted during construction. It's important that information regarding this impact is communicated and that alternative sites (where possible) are signposted to allow for this informal drop-off during construction period. This is particularly important given the loss of parking spots during the construction phase.

5 Traffic, transport and access

Acknowledging the primary objective of the project is to improve station access for rail customers, the proposal is generally supported. Various aspects of the proposal regarding pedestrian and cyclist connectivity are discussed in detail below.

5.1 Improvements to the pedestrian and rail customer facilities

The proposed improvements are supported by the City, and it is recommended that they are carried out in accordance with City Standards and the Street Design Code. It is recommended that the proponent consult with the City's Public Domain Unit during the detailed design stage of the public domain improvements to achieve the requirements.

5.2 Concourse access and connection

As mentioned above, the primary aim for the new concourse is to provide equitable access to platforms 1-10. This is also an opportunity to provide a much-needed cross corridor connection to both sides of Redfern. The City recommends part of the concourse is barrier-free to provide access across the rail lines for all pedestrians and cyclists. The 6-metre wide walkway has been designed with the primary function in mind. The City would support any opportunities to further explore providing a wider crossing to ensure there is space for those wanting to cross the corridor on foot or with a bicycle.

The proposal suggests that access to the platforms would be limited to paying customers and platforms would be closed after hours. Concourse and station entrances however, are proposed to remain open, where possible. An unrestricted access to concourse and use of this facility as a through-station link over the platforms between Little Eveleigh Street and would see a wider benefit to the community. The City recommends equitable access across the site is provided for people who do not have an Opal card or credit card to tap on and off at each end of the concourse.

5.3 Little Eveleigh Street shared zone

As discussed in Section 3 above, the introduction of a shared zone along Little Eveleigh Street will enhance pedestrian and cyclist experience. It is noted that the existing dedicated cycling path has proposed to be removed as part of formalising the shared zone. The City welcomes discussions to modify the existing street conditions through separate consultation and referral to the LPCTCC for endorsement. Additional reports, information or design changes may be required by City or the LPCTCC. The cost of any changes and associated documentation are to be undertaken by the applicant. The plan is to be approved as part of the Public Domain Plan and prior to commencement of any public domain work.

Formal loading arrangements are to be provided within the new formalised shared zone areas to provide appropriate servicing to adjacent properties including deliveries, general servicing (e.g. plumbing/electrical) and tenant/resident move-in move-out. This needs to be considered as part of the co-design process.

The EIS also notes that a review of the operation of shared zones would be conducted upon opening of the station upgrade with residents and stakeholders. ATAC (transport panel) and City Inclusion (Disability) Panel members are requested to be invited to this testing experience. If this is not possible, it is recommended that a people with varying disabilities are invited to the testing experience.

5.4 Impact on cycling

The proposed change to the cyclists and cycle routes around Redfern Station are supported.

As raised above, the removal of existing dedicated contra lane for cyclists needs to be reviewed under a separate application. The shared zone is designed to be a safe zone for all modes of transport, with a speed limit of 10km/h. The provision of additional bike parking facilities is expected to attract additional bicycle users to the area. Overall, the improvements are supported as they improve pedestrian and bicycle connection to Redfern Station and the surrounding active transport network.

5.5 On street parking changes

The proposal will permanently remove 22 on-street parking spaces and relocate 21 (including two car share parking bays) car parking spaces.

Redfern Station is in a dense urban area and the loss of those parking spaces has been minimised. The loss of an on-street parking space however, may pose some extra pressure on surrounding parking supply.

An additional six parking spaces will be lost due to providing two kiss and ride locations and a bus zone at Gibbons Street and Lawson Street. The proposed kiss and ride locations will provide an overall improved point-to-point connectivity for the people who choose this option. Moreover, it is expected that the kiss and ride zones as designed will remove unsafe and illegal drop off and pick up of customers at the stations.

5.6 Impact during construction

Appropriate diversions and closures are to be maintained to ensure the safety and pedestrian, bicycle, and vehicle traffic flow during construction. The City recommends a Construction Traffic and Pedestrian Management Plan is prepared and approved prior to the commencement of any works.

6 Heritage

The proposal is supported, however more detailed technical drawings and further information and clarification are required to properly assess the impacts on surrounding heritage fabric and streetscapes. The City recommends the adoption of all formal recommendations contained in Technical Report 5 – Non-Aboriginal Heritage and provides additional comments and recommendations as follows:

6.1 Relocation of Platform 1 office building

The Project includes the demolition of the lean-to structures attached to the Platform 1 office building and relocation of the principal building approximately 14 metres south of its present location to make room for the stairs, lifts and landing for the new concourse.

Chapter 14 of the submitted EIS concludes that the relocation of Platform 1 Office Building has a negative impact on the station's intact collection of railway buildings, which has been identified as a rare element. These adverse effects are mitigated by relocating the building within the same visual context on Platform 1.

The relocation will not be reversible, and the building will never be located back on its original location due to the proposed lift and staircase.

This is supported in principle, conditional on the following:

- A thorough archival recording of the building in its existing location is to be undertaken including any measured drawings deemed necessary by the heritage consultant involved in the project, to capture the contextual relationship of the building within the group of station buildings.
- Detailed technical drawings rather than diagrammatic drawings will be required in the form of plans, sections and elevations showing physical intervention and impact on the existing fabric of the building due to installing and uninstalling the support structure. The drawings should also include a site plan showing these extent of the existing platform, all existing built and landscape features located within the context of the buildings, like trees and brick vents.
- The heritage report must include an assessment and documentation of the interior and exterior of the building before any work takes place.
- A building condition report is to be prepared and a building survey should be undertaken before and after the proposed relocating to compare, identify and remedy any physical damage during the move.
- A heritage interpretation strategy should be prepared to mark and interpret the original location of the building.
- Any proposed works should be undertaken with utmost care to protect other existing original /historic fabric from accidental damage, like the brick vents located close to the work site.
- All recommendations made in the heritage report for the building should be adopted including finding an adaptive reuse for the building and establishing the garden that used to surround the building historically.
- The relocation works must be closely supervised by a heritage consultant and a strategy established for steps to take to remedy any damage in lines with the heritage advice.

6.2 125-127 Little Eveleigh Street contributory building

The proposed retention and reuse of the contributory building is welcomed and supported in principle. Detailed demolition plans, sections and elevations should also be provided. It is unclear how the proposed roof of the bridge interacts with the contributory building as it appears to be at the same level as some of the existing windows.

The structural integrity of the building is a concern considering that the proposal involves demolishing all internal floors, beams and columns. A structural adequacy and methodology should be provided to ensure the external fabric remains intact while internal floors, beams and columns are demolished. As recommended by the heritage report, the architect should explore any potential to retain some original structure internally which includes timber floors, timber joists and columns. Retention of the original internal structure could potentially be considered as mitigation against the adverse visual and physical effects of the proposed concourse on the building and its context. As the interior of this building will be

publicly accessible, having original structure there would enrich and enhance the user experience of the space.

The proposed continuation of external paving inside the building is not considered appropriate for the character of the building. The internal floor finish should be differentiated from the outside and be sympathetic to the industrial character of the warehouse. Further, it is recommended that the exposed brick surface not be painted and the patina of age of the building should be maintained and enhanced.

Additionally, any new windows are recommended to be timber double hung with glazing bars to match the existing windows and a roof plan should be provided for roof drainage details. Further details should also be provided for the entry roof canopy design and its fixing into the contributory building.

The City recommends that all recommendations made in the heritage report for this building submitted with the EIS be adopted including “Recommendation 10 – 125-127 Little Eveleigh Street” as provided in Section 12.3.9 of the Technical Report 5 for Non-Aboriginal Heritage.

6.3 Marian Street Entry

The bulk and scale of the new Marian Street entry building and the use of perforated screening along the concourse is generally acceptable but a finalised material and finishes schedule is recommended to be provided to ensure the perforated screen cladding is as visually permeable as possible.

6.4 Street upgrade works

- Any original sandstone kerbing and guttering encountered during the street works should be maintained.
- Any new landscaping within the street works should be in keeping with the significant of the heritage conservations areas
- Works within close proximity of any local LEP heritage items should provide for protection against accidental damage.

6.5 New carpark

The City raises no objection with the provision of a new carpark to provide parking spaces that will be lost from Little Eveleigh Street as a result of the public domain upgrades. This site however, is assessed to contain relics of local significance and an archaeological investigation and assessment is recommended to be undertaken.

7 Public Art

The submitted EIS states that the proposal will include a number of artworks by both Indigenous and Non-Indigenous artists and refers to a Draft Heritage Study by Tonkin Zulhaika Greer, which “highlights the way the project will engage with local artists and the Aboriginal community”. The study has not been submitted with the EIS and as such, the City cannot provide detailed comments on the consultation and commissioning process of artists. Any future submission of additional information should include a copy of this study.

The City is supportive of the provision public art within the project and encourages the installation of public artworks by various artists where appropriate.

It is recommended that a Public Art Strategy (or Preliminary Public Art Plan) be prepared in accordance with the City's Public Art Policy and Guidelines for Public Art in Private Development and submitted to the City for further review.

8 Biodiversity

The project has an opportunity to enhance the local biodiversity and species of local conservation significance through associated landscaping. As the rail corridor falls on the City's identified potential habitat linkages (in accordance with the City's Urban Ecology Strategic Action Plan), there is an opportunity to consider how these sites can contribute to broader objectives of improving connectivity and local biodiversity. This project also has the potential to support the City's Aboriginal and Torres Strait Islander Panel request to seek opportunities to increase and improve native plantings across the City.

The EIS correctly identifies that all vegetation currently present in an around the project area comprises planted and regenerated native and exotic species occurring on highly modified soils and landforms. However, the chapter does not identify opportunities to enhance the area for species of local conservation significance as identified in the City's Urban Ecology Strategic Action Plan. The recommendations below offer to contribute to this objective.

The following sites are nominated for landscaping under these works in Chapter 9 of the EIS:

- Little Eveleigh St (West)
- Little Eveleigh St (East)
- Lawson St
- Gibbons St; and
- further in Table 9 – 10, it is identified “tall shrub plantings would be considered along the rail corridor boundary at Marian Street to assist in preserving privacy of residents within the Watertower residential building”

As identified Chapter 16.6 of the EIS, it is recognised that trees would “provide a limited degree of habitat connectivity with other surrounding urban vegetation, the works proposed could contribute to increasing this value.” The project should recognise the value of other vegetation in addition to trees in contributing to connectivity.

Further, the specific species type and location of vegetation offsets are recommended to be confirmed during detailed design, with consideration to creating habitat connectivity where possible. It is recommended that all landscaping plans and technical specifications include design outcomes that contribute to habitat and biodiversity enhancements by choosing a diverse selection of locally native and appropriate species. It is recommended that detailed landscape plans and specifications be submitted and reviewed by the City prior to the commencement of work.

9 Land contamination

Appendix G (Geotechnical and Contamination Investigation Reports) of the submitted EIS makes reference to a Contamination Investigation Report, prepared by Jacobs

(dated 5 February 2018, Document no. IA 157700-RP-GI-0025 1 02). The report confirms the results for a preliminary (stage 1) contamination assessment which revealed contaminants (heavy metals and benzo(a)pyrene) exceeding ecological assessment criteria however significant contamination which would constrain the development (railway) was not identified. The consultant has acknowledged that the assessment was preliminary in nature and that there are potential areas of contamination across the site.

In view of above, it is recommended that a Detailed Environmental Site Investigation (DESI) is to be carried out by a suitably qualified and competent environmental consultant and submitted to the Consent Authority for further review in accordance with the NSW Government Office of Environment and Heritage, Guidelines for Consultants Reporting on Contaminated Sites, Contaminated Land Management Act 1997 and SEPP 55 Remediation of Land” confirming that the site is suitable (or will be suitable, after remediation) for the proposed use.

Where the DESI states that the site requires remediation, a Remediation Action Plan (RAP) is to be prepared by a suitably qualified and competent environmental consultant in accordance with the NSW Government Office of Environment and Heritage, Guidelines for Consultants Reporting on Contaminated Sites and the Contaminated Land Management Act 1997 and submitted to the Consent Authority for approval.

It is recommended that the DESI/s and any RAPs prepared, be peer reviewed by a NSW EPA Accredited Site Auditor and include a section B Site Audit Statement from the Site Auditor certifying that the RAP/s are practical, and the site will be suitable after remediation for the proposed use/s.

10 Waste and resources

The proposal must clearly demonstrate a commitment to the NSW EPA 2014-2021 WARR Strategy targets.

The submitted EIS lacks detail to adequately consider waste management plans. It is recommended that a waste management plan be prepared and include the following:

- Detail in the demolition and construction waste management plans – material storage areas for reusable materials and recyclables during demolition and construction; vehicle access to material storage areas; estimation of quantities and types of materials to be reused, recycled or left over for removal from the site.
- Detail in the operational stage waste management plan – plans and drawings of the proposed development that show location and space allocated to the waste and recycling storage area(s).
- Nomination of the waste collection point(s) for the site.
- Identification of the path of access to be used by collection vehicles.
- Details of the ongoing management of the storage and collection of waste, including responsibility for cleaning, transfer of bins between storage areas and collection points, maintenance of signage and security of storage areas.

The waste management plan must also comply with the storage, waste and recycling collection, and general conditions detailed below:

a) Storage

Commercial waste and recycling receptacles and any bulky waste must be stored on the property at all times and must not be placed on kerbside for collection.

b) Waste and Recycling Collection

Commercial waste service collection services and waste storage arrangements must be conducted in accordance with the City's *Waste Policy – Local Approvals Policy for Managing Waste in Public Places (2017)*.

11 Land use and property

It is noted the existing warehouse building at 125-127 Little Eveleigh Street currently contains a non-for-profit social enterprise tenant. The tenant will be required to vacate to facilitate the construction works and it is unclear what the proposed future use of the remaining floor space within the building will be. The proponent states that 60% of the building will be used for station operation purposes once construction is completed. The City recommends that any residual floor space within the building is used for the same or a similar social/not-for-profit enterprise if possible.

Any additional response to submissions should include technical drawings of the proposed concourse design, materials and finishes, detailed architectural drawings of all works to the warehouse building at 125-127 Little Eveleigh Street and other detailed drawings of all public domain works.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au

Yours sincerely,



Graham Jahn AM
Director
City Planning | Development | Transport