

RESPONSE TO PUBLIC EXHIBITION COMMENTS:

HERITAGE, CULTURE AND CONTEXT

Pemulwuy Precinct 3, Student Accommodation (MP 06_0101 Mod 2 and SSD 8135)

1 February 2018

1. INTRODUCTION

This report addresses comments received during Public Exhibition of the Pemulwuy Precinct 3 project regarding envisaged impacts on the heritage, culture and context of the existing urban fabric.

This report responds directly to comments received from the following authorities:

Department of Planning and Environment NSW (Letter to Mr Greg Colbran, Deicorp Ltd, dated 10 November 2017); and,

Office of Environment and Heritage - Heritage Division (Letter to Ms Amy Watson, Department of Planning and Environment, dated 7 November 2017).

This report also provides a response to the associated analysis and summary of public comments documented in:

Sierra Marketing, *Public Feedback Report. NSW Government Planning and Environment – Website Submissions. MP06_0101 MOD 2 Pemulwuy Project Redfern – Concept Plan Modification. SSD 8135 Pemulwuy Project Redfern – New Student Accommodation Building*, December 2017

This report references a number of documents. Reference details are provided in section 5 of this report.

2. BACKGROUND

The Heritage Impact Assessment (NBRS+Partners, June 2017) evaluated the provisions relevant to heritage impact assessment contained in the following reports:

- State Environmental Planning Policy (State Significant Precincts) 2005 (SSP SEPP)
- State Environmental Planning Policy No 55 – Remediation of Land
- State Environmental Planning Policy (Infrastructure) 2007
- A Plan for growing Sydney
- Draft Central Business District Plan
- Central to Eveleigh Urban Transformation Strategy
- Draft Architecture and design Policy for NSW
- NSW Long Term Transport Master Plan

- Redfern-Waterloo Built Environment Plan (Stage One) August 2006
- Sydney Development Control Plan 2012 – Sections 3.9.5 and 3.10

The Heritage Impact Assessment was prepared in accordance with the guidelines established by NSW Heritage Office (now Heritage Division of the Office of Environment & Heritage) publication 'Statements of Heritage Impact', 2002. The Heritage Impact Assessment concluded that the heritage aspects of the project be approved subject to review and implementation of the *Heritage Interpretation Strategy* (in coordination with the Public Art Strategy) and archival recording of the site prior to construction.

3. RESPONSE TO COMMENTS – HERITAGE, CULTURE AND CONTEXT

3.1. HERITAGE DIVISION OF NSW OFFICE OF ENVIRONMENT AND HERITAGE

The following comments received from the Heritage Division are included in italics and a response is provided below:

- 3.1.1. *The four-fold increase in height being sought under MOD 2 will have a major adverse impact on Redfern Station's setting, being sited only 50m away.*

The proposal was developed through a rigorous design process involving the Government Architect and a Design Review Panel. The sensitivity of the Railway Station Group/Redfern Station Booking Office was appreciated and taken into consideration in the development of the design.

- 3.1.2. *The proposed 24 storey tower will be an extremely conspicuous and detrimental addition to the Station's immediate setting.*

The height of the proposal responds to the revised height and density controls of the Central Sydney Planning Strategy for 2016-2036. The development allowed by this government initiative will significantly alter the wider Redfern area and subsequently the setting of the Booking Office. (Illustrated by Grimshaw p.50.)

The design of the proposal is cognisant of its siting adjacent to the heritage site of Redfern Station Group and the historic character of the immediate setting. It responds to the setting in the following ways:

- The mass of the proposal is 'broken-up' through the use of different heights and materiality of the three major components of the structure.
- The podium level responds to the pedestrian scale by providing activated development to the street frontage, public open space and covered areas, and building façade articulation responding to the vertical rhythm and horizontal rise of the surrounding terrace homes.
- The portion of the development closest to the corner of Eveleigh and Lawson Street is coloured in a neutral palette in order not to detract from the rich colouration and materiality of Redfern Station Group's Booking Office. It is set back from the corner of the site so as not to encroach on the setting of the Booking Office. It retains the existing boundary walls to the railway reserve and preserves the extant public art which has become important in the history of The Block, the Aboriginal community of Redfern and its pivotal role in the history of Aboriginal politics, self-determination and the growth and development of Aboriginal Community-controlled organisations from the late 1960s.
- The tallest portion of the development is set furthest away from Redfern Station Group and on the lowest area of the site which is substantially below the ground level of the Booking Office. The tower is designed to reflect the fine grained vertical detailing and rhythm of the surrounding neighbourhood and does not attempt to challenge or mimic the aesthetic qualities of the Booking Office.



Figure 1 - View from Regent Street to the north. Due to the siting, the project is viewed as lower than existing developments. Booking Office circled red.



Figure 2 - View from Little Eveleigh St looking north. The pedestrian-scaled environment along Eveleigh Street is maintained through careful attention to design and massing in relation to the Redfern Station Booking Office and upper level station structure.

- 3.1.3. The disparate scale between the single storey station and 24-storey tower will cause the tower to loom over the station. Also, the proposed tower will be extremely conspicuous in views to and from the front (Lawson St) entry of the single storey Redfern booking office and in views of it along Lawson St.

The site on which the development is located falls away from the ground level of the Booking Office. The highest portions of the proposal have been located at the end of the site most removed from Booking

Office whilst still respecting the local context at the lower end of Eveleigh Street. The proposed development does increase the built forms in the vicinity of the Booking Office, however it does not detrimentally impact on any understanding of the heritage item.

The proposed development does not impact views to and from the Booking Office along Lawson St.

The Statement of Significance and assessed cultural heritage values contained within the listing entry do not attribute any significance to views to or from the Station or Booking Office



Figure 3 - View along Lawson Street from east. Booking Office circled in red.



Figure 4 - View along Lawson Street from the west. Booking Office circled in red.

- 3.1.4. *I acknowledge that there are four existing towers approximately 80m east of the station. However, these towers are not directly in front of the Booking Office's street elevation and are lower than 24 storeys.*

The area in the vicinity of the Redfern Station Group is subject to the revised height and density controls of the Central Sydney Planning Strategy for 2016-2036. The development allowed by this government initiative will significantly alter the wider setting of the Booking Office. (Illustrated by Grimshaw p.49, below.)

The Redfern Station Group will also be subject to substantial change in a proposed upgrade of station facilities as outlined the Central to Eveleigh Urban Transformation Strategy (Grimshaw p.36).

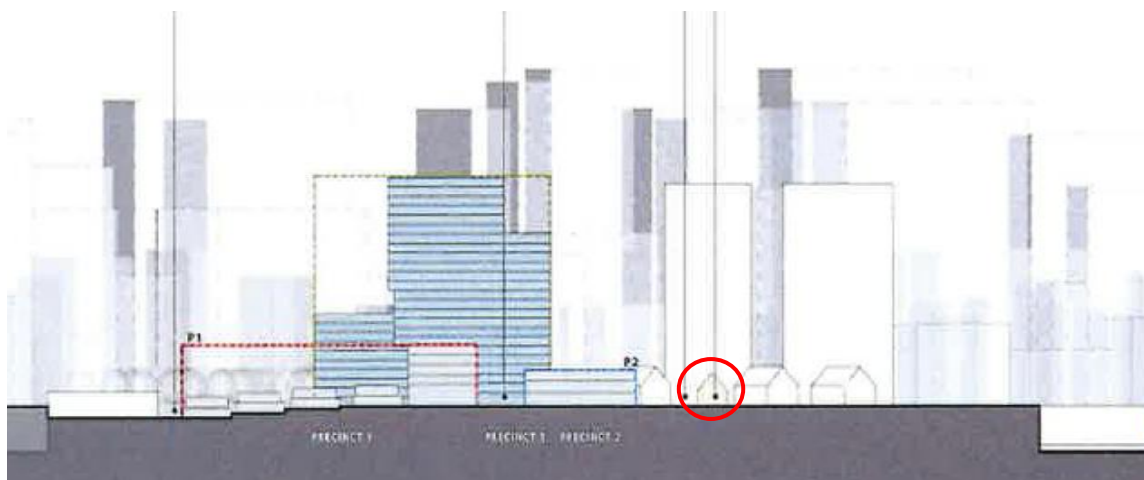


Figure 5 – Extract from Urban Context Report (Grimshaw p.49) looking east along Lawson Street, showing existing developments in white and speculative density increases shaded. Booking Office circled in red.

- 3.1.5. *In addition, the tower's eye-catching combination of tall blade walls, textured finishes, strong colours, gridded fenestration and shaft of curtain glazing will draw excessive attention to itself and make the 24-storey tower appear nearer to the station than it actually is.*

Further to comments on the design provided in point 3.1.2 and 3.1.3, the narrow area of glazing facing towards the station provides opportunity for passive observation and security over the Redfern Station Booking Office and Redfern Station Group. The glazing is deliberately designed to recede from view by being recessed from the planes of the east and west walls and set within dark framing it will provide a surface which will reflect the surrounding development, landscape and sky. The glazing also provides residents with enhanced views and amenity and allows an appreciation of the design and layout of the Booking Office and Redfern Station Group.

- 3.1.6. *Because of the serious adverse impacts of the proposed 24 storey tower on the Redfern Railway Station Group (SHR 01234) setting, Modification 2 should not be approved. Instead, the original six storey concept would be a more sympathetic development and it will not have an adverse impact on the setting of the Redfern Railway Station Group (SHR 01234)*

The proposal responds to the significance of the Redfern Station Group as a commuter hub and the expansion of Redfern Station and the Sydney network into the 21st Century.

The proposed development reflects the continuing changes to the surrounding context of Redfern Station Group which have been part of its history.

The proposed development has been formulated on a commercial basis to ensure viable return on investment and fit-for-purpose outcomes for the long term.

- 3.1.7. *The Historical Archaeological Assessment by Curio Project Pty Ltd included with the environmental impact assessment finds that nos77-123 Eveleigh St Redfern does not have the potential to contain historical archaeological relics of local or state significance. The assessment concludes that two conditions should be appended to the approval of the proposal to deal with unexpected finds. I advise that the historical archaeological assessment is generally fit for purpose and the recommended conditions will satisfactorily deal with any unexpected finds.*

Noted. The proponent agrees with the proposed conditions.

3.2. PUBLIC FEEDBACK REPORT, SIERRA MARKETING, DECEMBER 2017

Summarised comments regarding heritage, culture and context contained in the Public Feedback Report are included in italics and a response is provided below:

- 3.2.1. *Category of Objection - Design Excellence, culture and heritage: objection to a design that is considered to not match the local character of the area detracting from the local community, culture and heritage.*
- *Design excellence, culture and heritage*
 - *Does not match the character of the area*
 - *New development will detract from the community culture by introducing modern features to an area predominantly of terrace homes and heritage buildings such as Redfern Railway Station.*
 - *Concern over size and scale, particularly height, and how it will negatively impact the surrounding neighbourhood and indigenous community of the area.*
 - *Adjacent to conservation area*

The comments relating to height, size, scale and design of the proposed development in relation to the Railway Station Group and Booking Office are addressed in section 3.1 of this report. Community concerns regarding character of the area are further discussed in the following text.

The following response relates to the adjacent conservation area and character of the area generally:

- Precinct 3 is the furthest removed portion of Pemulwuy from the Darlington Heritage Conservation Area. Its location is also most removed from those streets within the Conservation Area assessed as having the most intact streetscapes. The narrow width and density of development on these streets serves to limit views out of the street and thus the important views are those along the line of the streets where the scale and rhythm of the relatively homogeneous narrow lot development can be appreciated.
- Caroline Street is the one exception in this area where the view-line extends upwards toward Precinct 3. The area of intact streetscape is located centrally in the street block and on the southern side of the street facing public open space in the two blocks between Abercrombie and Louis Streets. The block between Louis and Eveleigh Street is the location of the approved Precinct 1 development which will contain a mix of residential and community facilities.

- o The design follows the conservation principles established in the Australia ICOMOS Burra Charter 2013 which is the principal guiding document for conservation in Australia. Article 22 in particular, refers to New Work, stating that new work should be readily identifiable and not distort the cultural significance of a place.

In accordance with Article 22, the proposal uses new materials and finishes and does not attempt to mimic the materials, colours and finishes of the heritage conservation area. It incorporates visual clues developed from the fine-grained vertical rhythm of the Heritage Conservation Area. The podium heights reflect the heights of the two-storey terraces with steep roof pitches, effectively interpreting both the vertical and horizontal rhythm of the neighbourhood.

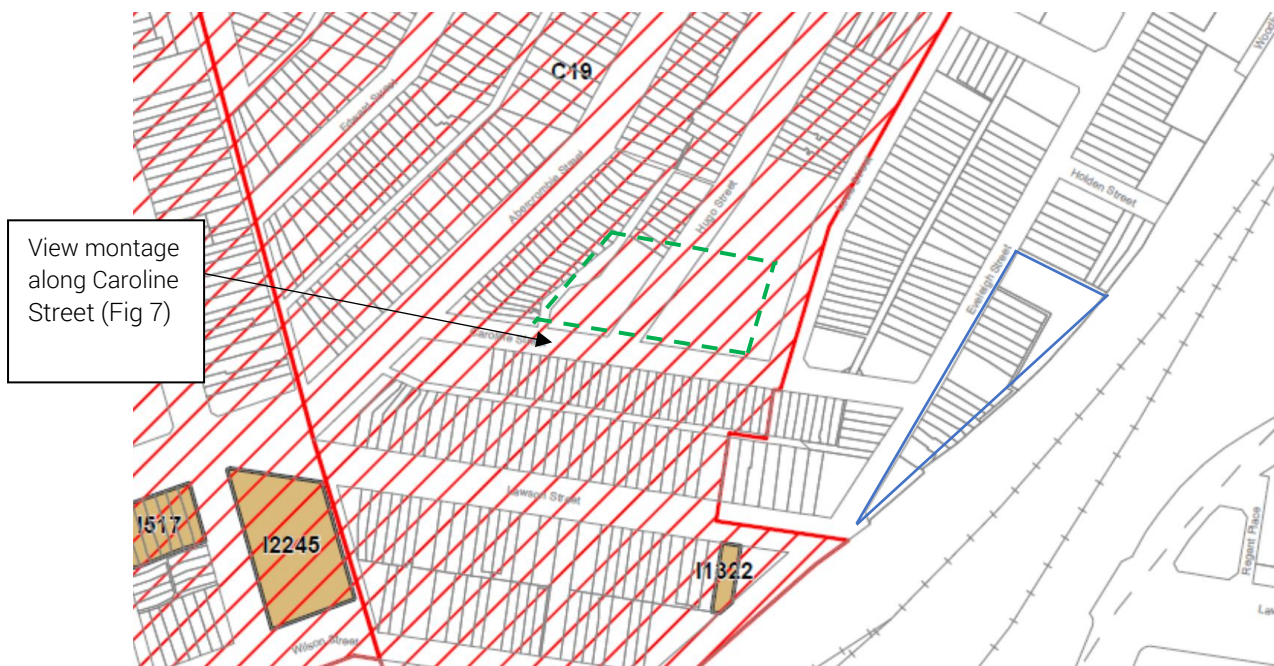


Figure 6 – Plan showing Conservation Area (Red), public open space (green) and Precinct 3 (blue).



Figure 7 – Proposed view along Caroline Street.

3.2.2. *Preservation of indigenous culture and heritage in the area will be threatened; Loss of previous positive aspects including art gallery to display Indigenous Art*

A Heritage Interpretation Plan (NBRS 2011) has been prepared for the development of The Block. The Interpretation Plan provides policies, strategies and advice for re-telling the stories associated with the site and the area to ensure the associated culture and heritage are retained and understood by future residents of, and visitors to, the site.

Within the Interpretation Plan are eight suggested opportunities for interpretative devices and implementation, one of which was the inclusion of an Art Gallery which included the eastern wall adjacent to the railway reserve and an additional internal space.

The primary purpose of the 'gallery' was intended as 'an opportunity for visitors to The Block to gain an understanding of Aboriginal cultural beliefs and access to Aboriginal material and culture.' The gallery facility has been relocated to Precinct 1.

The revised Precinct 3 development includes improved retention of the eastern wall to the Railway Reserve enabling retention of existing artworks and/or replacement with new art as desired by the Aboriginal community. In addition, the building itself contains numerous opportunities to display works from Aboriginal artists, both in publicly accessible areas and in areas occupied by a transient population of students. This 'casual' display of work has the ability to widen the impact of the interpretation much more than limiting this activity to a gallery space.

The revised proposal shows an Aboriginal design to the soffit of the entrance to the building and opportunities for additional interpretation in the public open space can be explored during future detailed design of the project.

The Block will remain under Aboriginal ownership and control. The use of this site for commercial development is a continuation of the Redfern tradition of advancement of Aboriginal people through self-

determination and ultimately economic independence that commenced in the area in the late 1960s-70s. The project is significant in the development and maturation of Aboriginal community-controlled organisations breaking away from reliance on government grants and concessions.

The economic independence gained from this project will allow further significant work to be undertaken by the Aboriginal Housing Company to ensure an ongoing benefit for the Aboriginal community which it serves.

4. CONCLUSION

The revised height and density controls provided by the Central Sydney Planning Strategy for 2016-2036 will significantly alter the built form of many established inner-suburban areas. The protection of Heritage Conservation Areas and individual heritage items is an important component of maintaining a community's sense of place and identity, especially during times of great change.

The revised design of Pemulwuy Precinct 3 is cognisant of its siting adjacent to the heritage site of Redfern Station Booking Office (Redfern Station Group) and historic character of Darlington Conservation Area. The proposal has achieved design excellence through a rigorous design process involving the Government Architect and a Design Review Panel.

The design has successfully responded to the Article 22 principles for New Work established in the Australian International Council of Monuments and Sites (ICOMOS) Burra Charter 2013; the principal guiding document for conservation in Australia.

In addition, the proposal responds to intangible heritage through interpretation of the history of the site and its community. The development is historically significant in the history of the development of Aboriginal community-controlled organisations which commenced in Redfern in the 1960s allowing for advancement of Aboriginal people through self-determination and economic independence.

5. REFERENCES

Cardno, *Visual Impact Assessment*, 12 December 2017.

City of Sydney, Letter to Amy Watson, Department of Planning and Environment, dated 27 October 2017.

Curio Projects, *Historical Archaeological Assessment and Aboriginal Cultural Heritage Assessment Advice for 83-123 Eveleigh St, Precinct 3 Pemulwuy, The Block, Redfern*, 6 June 2017.

Department of Planning and Environment NSW, Letter to Mr Greg Colbran, Deicorp Ltd, dated 10 November 2017.

Grimshaw, *Pemulwuy Project Urban Context Report*, June 2017.

NBRS Architecture, *Heritage Impact Assessment. Concept Plan Modification (MP 06_0101 MOD 2) and State Significant Development Application (SSD 8135) Pemulwuy Project, The Block, Redfern*, June 2017.

NBRS+Partners, *Heritage Assessment. Railway corridor retaining wall north of Redfern Railway Station, Redfern NSW 2016*, 9 December 2011.

NBRS+Partners, *Heritage Interpretation Strategy, Pemulwuy Mixed Use Development, The Block, Redfern NSW 2016*, 9 December 2011.

Office of Environment and Heritage - Heritage Division, Letter to Ms Amy Watson, Department of Planning and Environment, dated 7 November 2017.

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