

**Submission number:** 5

**Submitted on:** 24 November 2022

**Submission type:** I am submitting on behalf of my organisation

**Name:** Australian Society for the Study of Labour History

**Suburb and postcode:** Aranda 2614

**Please provide your view on the project:** I object to it

**Submission:**

We, the Federal Executive of the Australian Society for the Study of Labour History (ASSLH), express concern about Mirvac's proposed redevelopment of the Locomotive Erecting Shop (LES) on the Eveleigh Railway Workshops site.

The ASSLH was founded in 1962, with the aims of promoting and preserving labour history and heritage. Our Society has branches in Canberra, Sydney, Brisbane, Melbourne, Adelaide and Perth. Across Australia, our members have worked for the preservation of industrial sites and industrial heritage, notably at Eveleigh Workshops in Sydney and Midland Workshops in Perth.

Our particular concern relates to Mirvac's proposals to create three stories within the LES building and to relocate the external loading dock. According to the draft put out for public comment by your own Department of Planning and Environment (Large Erecting Shop – Explanation of Intended Effect, p. 7):

The LES was the largest, single purpose structure in the workshops complex and is unique in Australia as a surviving erecting shop of this scale.

Surely, this significance and uniqueness justifies maintaining the internal as well as the external appearance of this building in any proposed reuse. The installation of two extra floors will destroy the internal aspects, which currently show the grand structure of a 19th century industrial building. Additionally, we understand that there will be no rail access to the building and that the loading dock is proposed to be relocated – both of which will change the external appearance.

In September, the State celebrated the 90th anniversary of the Sydney Harbour Bridge by running the 79-year old 3801 locomotive across it on what was termed 'an historic occasion'. Channel 7 featured the Transport Minister of NSW saying how important it was for people of today to learn about how their forebears lived and travelled. 3801 was constructed at the Eveleigh Workshops and their preservation is as important as is the preservation and maintenance of the locomotive.

The ASSLH does not oppose the sensitive adaptive re-use of industrial buildings, but we do strongly object to the proposed project. Any re-use of this significant building should permit the public continued access to it and the opportunity to view the full height of the ceiling. It should also retain other features that indicate the original use of the building, such as railway lines and crane tracks. There is no indication that this is part of the planning.

24 November 2022

**Professor Rae Frances, AM, FASSA**  
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### **To Whom it May Concern**

*Re: Submission in relation to Mirvac proposed redevelopment of Locomotive Erecting Shop at Eveleigh Workshops site.*

We, the Federal Executive of the Australian Society for the Study of Labour History (ASSLH), express concern about Mirvac's proposed redevelopment of the Locomotive Erecting Shop (LES) on the Eveleigh Railway Workshops site.

The ASSLH was founded in 1962, with the aims of promoting and preserving labour history and heritage. Our Society has branches in Canberra, Sydney, Brisbane, Melbourne, Adelaide and Perth. Across Australia, our members have worked for the preservation of industrial sites and industrial heritage, notably at Eveleigh Workshops in Sydney and Midland Workshops in Perth.

Our particular concern relates to Mirvac's proposals to create three stories within the LES building and to relocate the external loading dock. According to the draft put out for public comment by your own Department of Planning and Environment (*Large Erecting Shop – Explanation of Intended Effect*, p. 7):

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Surely, this significance and uniqueness justifies maintaining the internal as well as the external appearance of this building in any proposed reuse. The installation of two extra floors will destroy the internal aspects, which currently show the grand structure of a 19<sup>th</sup> century industrial building. Additionally, we understand that there will be no rail access to the building and that the loading dock is proposed to be relocated – both of which will change the external appearance.

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Raelene Frances  
President  
Australian Society for the Study of Labour History

**Submission number:** 6

**Submitted on:** 24 November 2022

**Submission type:** I am submitting on behalf of my organisation

**Name:** Australian Society for the Study of Labour History, Sydney Branch

**Suburb and postcode:** Newtown 2042

**Please provide your view on the project:** I object to it

**Submission:**

**Comment and Objections:** Transport for NSW Rezoning Proposal, heritage registered Large Erecting Shop, (South Eveleigh Train Workshop).

Preliminary comment:

I would welcome historically informed proposals to restore the Large Erecting Shop (the LES) and to open it to the public. However, I object to key aspects of this proposal: noting the global heritage significance of the entire Eveleigh workshops precinct, the building's heritage listing, and its potential for adaptive reuse to incorporate accessible community, cultural and creative spaces while retaining the functional integrity of the structure and its magnificent height and scale. I object to the State-led rezoning application proposed to the Department of Planning and Environment (DPE) which would amend the planning controls currently applying to the site: this application will certainly compromise both its existing heritage and its creative community potential.

The Large Erecting Shop

As one of 3 separate primary railway workshops in the heritage listed Eveleigh (North and South) precincts, and the last of the 3 undeveloped, the LES is an irreplaceable and last-ditch opportunity within the Eveleigh precincts to protect and provide world class creative and community spaces which acknowledge the heritage of the building, its urban and industrial significance, and its location on Gadigal land.

Its extraordinary scale offers opportunity for both permanent and pop-up creative artistic workshops, local creative retail and subsidized community spaces, and museum space. Crucially that scale, which illustrates the massive nature of the work done in the LES since its construction and which is integral to understanding work and purpose, will be lost should floors be added for any reason, including for commercial and office space. To insert floors would obliterate scale and dilute structural integrity. The magnificent art nouveau windows, emphasising height and allowing light into the building, will lose architectural connection and design significance.

I object to any proposal likely to block historical understanding of the LES.

Precinct Overview

In the Eveleigh precinct as a whole, adaptive reuse has already seen:

Carriageworks (at North Eveleigh) as a highly successful adaptation generally preserving the immense carriage working space while incorporating exhibition and theatre space, and café space. Note that each of these, including the restaurant/ cafe space, is venue hire only. Only

the Saturday produce markets in the covered work section opposite the main heritage buildings offer ongoing weekly community use.

The Locomotive Workshops at South Eveleigh currently offer extensive retail and commercial spaces sustaining the day to day needs of community and of the large workforce brought into the precincts by Commbank and Channel 7. Those spaces include the supermarket, a private education college (TOP) space, restaurant and upmarket cafe space (Lucky Kwong; The Grounds), a gym and the Blacksmith's workshop. A pub opens in early December.

While the Locomotive Shop's public spaces and walkways are punctuated with superb heritage machines which can be viewed by the public, only the Blacksmith's Shop offers actual public heritage space and experience. (Unfortunately the Blacksmith's Workshop heritage is likely to be overwhelmed when the pub, Brewdog, opens in December. The pub is situated opposite the workshops and, as noted in our objections on the DA in 2021, potentially risks machines given pub activities).

### Adaptive Reuse of the LES

Creative and community educational spaces, including affordable creative workshop spaces able to complement the Blacksmith's Workshop presentation and experience, could be established in the LES. I note that the TfNSW proposal does not reference provision of affordable creative work spaces. However, restoration of this building and reuse can answer the need for art and creative spaces (both commercial and affordable) to be integrated into fabric of local community and answer the ever-present need for such spaces across the city.

### Precinct need for pedestrian bridge over the railway line

Reuse of the LES raises again the absolute need for a pedestrian walkway linking South and North Eveleigh. Currently the only pedestrian links are via Erskineville Rd (at the LES end of the site) and via Redfern Station (at the Innovation Plaza end). This is not only grossly inadequate for pedestrian use, it encourages car use in an already congested area. A pedestrian bridge over the railway line, optimally from a point between the LES and the Locomotive Workshops, would answer public needs and link precinct buildings. Given convenient walkways between the Carriageworks sites, the Locomotive Workshops, and the LES, any new reuses can complement existing, avoiding duplications driven by distance inconveniences.

The Large Erecting Workshop, in its original (albeit now deteriorating) condition, is a unique chance to present railway heritage in Sydney as it was, concurrent with offering creative and productive community spaces. Proximity to the T2 and T3 rail lines, and to several rail stations – Redfern, MacDonalddown, Erskineville, Newtown – means that use and experience of the spaces would not be confined to locals, but available to communities across wider Sydney. A pedestrian bridge over the railway line would maximise public use and experience. Please ensure the bridge is re-integrated into immediate planning.

### Conclusion

In summary, for ongoing and valid historical interpretation, adaptive reuse of this unique structure must recognize the principle that heritage buildings should not be divorced from their original context and purpose. They can retain connection with their originating community when adaptive reuse is intelligently implemented. The Large Erecting Shop, situated as it is at intersections in the rail network servicing local and wider community, should therefore answer the cultural and creative needs of community. It should historically inform about the extraordinary industrial working history of the Eveleigh sites. In this it should complement, not

replicate, commercial and retail reuse already in place across North and South Eveleigh. This is a locally, nationally and globally significant opportunity not to be squandered by rezoning.

*(Dr) Rosemary Webb  
President, Labour History Sydney  
(Sydney Branch, Australian Society for the Study of Labour History)*

**Submission number:** 7

**Submitted on:** 7 November 2022

**Submission type:** I am submitting on behalf of my organisation

**Name:** Ecotransit Sydney

**Suburb and postcode:** Newtown 2042

**Please provide your view on the project:** I object to it

**Submission:**

On behalf of Ecotransit Sydney we submit the following:

1. The pedestrian & cyclist bridge needs to be built from Carriageworks across the railway corridor to the edge of the Large Erecting Shop (LES) at South Eveleigh.

In relation to the LES site specifically (south of the railway corridor) Ecotransit believes that:

2. The future DA should not be declared state significant as proposed, and that the City should be the consent authority.
3. Ecotransit strongly advocates for part of the building should be considered for heritage tourism.
4. Ecotransit strongly supports the retention of the external heritage fabric, but opposes the introduction of two internal floors will take away from the scale and characteristics of the large space linked to its historic use and the low ceilings will result in poor amenity. To maintain consistency with the building's original transport heritage ecotransit recommends much larger voids and substantially reducing the floor space.
5. The Redfern Waterloo Authority Contributions Plan is outdated and does not account for this additional development. Ecotransit Sydney recommends that the RWA Contributions Plan be rescinded and the City's development contributions plan should apply.
6. Ecotransit is very concerned there is no commitment to affordable workspaces and little consideration given to the potential for a late-night economy, given its location next to the railway.
7. Insufficient attention is given to the design of the public domain, particularly on Locomotive Street.
8. Ecotransit strongly believes that a reduction in car parking is imperative given the site's proximity to Redfern station, particularly in light of the new southern concourse.
9. Ecotransit calls for higher sustainability targets in the development, operation and waste management for this site.

**Submission number:** 8

**Submitted on:** 24 November 2022

**Submission type:** I am submitting on behalf of my organisation

**Name:** Rail, Tram and Bus Union Retired Members Association

**Suburb and postcode:** Dulwich Hill 2203

**Please provide your view on the project:** I object to it

**Submission:**

Rezoning Proposal Locomotive Erecting Shop RTBU Retired Members Association Submission

# **Rezoning Proposal-Locomotive Erecting Shed**

## **Submission of the Rail, Tram and Bus Union Retired Members Association**

The Rail, Tram and Bus Union, Retired Members Association represents 250 retired workers from the rail, tram and public bus industries. The Association has been active for the last six years in matters relating to the repurposing of the Eveleigh Locomotive Workshops at South Eveleigh with an emphasis on heritage interpretation and in particular workers social, industrial, union and political history.

The Association has made submissions in respect to various SSD applications and modifications relevant to the site and has appeared before the IPC on two occasions to advocate for the interests of rail workers. A number of members of our Association are actively involved in a volunteer capacity in the heritage rail sector. The Association has been represented on the South Eveleigh Community Liaison Group for the last two years though this body has been defunct for five months due to unilateral actions taken by Mirvac.

The Association is opposed to the State Led Rezoning Proposal for the LES. The Association argues calls for it to be sent back to the drawing board in order to include a hybrid option that allows for a functioning rail line into the LES to be retained for cultural heritage tourism together with accommodation for an archive/research centre/ mini museum.

The Rezoning Proposal is primarily a real estate/commercial vehicle for both the Government and Mirvac. Profit, yield and GFA maximisation are the drivers behind this proposal. No alternative or hybrid proposal has been put forward which takes into account its location, function, heritage significance, connection to the Sydney rail network and the implications for heritage interpretation and cultural heritage tourism for the local and NSW community. These issues are woefully downplayed or ignored in the various State Led Rezoning Reports.

The current planning controls are limited to rail infrastructure and educational functions for the LES. The planning controls proposed are for a business park/business zone which will allow for purely commercial and retail premises. As the Association understands the proposal the current planning controls will remain in place but the planning is wholly for commercial and retail purposes and no other options or hybrid combinations have been countenanced.

The essence of the Rezoning Proposal is to undertake alterations within the existing LES to convert the ground level into commercial and retail premises and the creation of two new "internal" storeys for similar purposes. The Association argues that with its alternative proposal these can continue but at a reduced scale. After 123 years of having a rail operating capacity the Rezoning proposal will close the South Eveleigh Precinct to the entry of all locomotives and rolling stock forever.

The Rezoning application proposes the rail tracks from the Sydney rail network into the LES will be either ripped up and/or be subject to heritage interpretation. Unlike alterations to the Eveleigh Locomotive Workshop or those proposed for the LES building the principle of reversibility for heritage fabric will not apply to rail operating fabric. There are a myriad of scenarios in which the proposed long term lease could be terminated and the principle of reversibility applied to reuse changes made to the heritage built fabric and the building restored to its near original condition. Business conditions can alter dramatically overnight as the Covid epidemic has shown.

The Eveleigh Locomotive Workshop produced maintained and repaired locomotives for 100 years. The LES is unique in the Eveleigh Railway Workshop precinct in that it continued to operate as a private sector locomotive engine and rolling stock repair depot for 30 years from the mid-1980s to 2017 whereas all the other workshop facilities were closed. Thus after 123 years of operation the State Led Rezoning proposal will literally take the Locomotive out of the Eveleigh Locomotive Workshops.

### **How much is too much?**

The Association argues that Mirvac has been handsomely rewarded for it's over a half billion dollar investment in the former ATP site. The total GFA of its investment has been the basis for some of the largest commercial leasing deals seen in Australia. Hundreds of thousands of GFA has been added to their commercial and retail property portfolio.

That the LES is being integrated into the South Eveleigh site is understandable given the history of the Eveleigh Locomotive Workshop of which the LES has been an integral part. Mirvac has not set the world on fire when it comes to promoting living heritage. The only living history functioning example is the Blacksmiths shop in Bays 1 and 2. They were established following a community campaign in the 1990s. Mirvac has invested in an upgrade of the Blacksmiths Shop and it is the centrepiece of ELWs connection with past historical functional uses.

The Association argues that maintaining the LES in a reduced form as a heritage rail facility would bookend South Eveligh with living heritage at the Eastern end of the precinct with the Blacksmiths Shop and at the Western end an operational rail heritage facility, albeit in a much reduced capacity. The reduction in the precincts GFA for its owner would comprise a few percentage points at most of its South Eveleigh commercial and retail property portfolio.

One argument put forward for the Business Zone/ Business Park rezoning is that because the adjacent Locomotive Workshops have this zoning it should automatically apply to the LES. This argument fails to take into account that the LES is currently a rail operational facility and zoned as such whereas there is no rail operational capacity at the ELW.

### **Many Study Requirements not met**

The Association in opposing the rezoning proposal argues that several of the Study Requirements have not been meet. As a general principle the study requirements were asked to identify positive and negative outcomes. The many negative outcomes of the proposal have not been addressed. These shortcomings include:

- Public Domain, Place and urban Design. It does not include a comprehensive site and context analysis. Reference is not made to the current rail operational capacity, its historic role and the implications of the strategy being pursued. No mention is made to the cessation of the connection to the Sydney rail network. The potential uses of the site have focussed only on one option. Constantly the documentation refers to the LES as an isolated site. It is not currently isolated from the Sydney rail network.
- The benchmarking assessment should have included a section where a like for like comparison was made with former heritage sites that continued ,at least in part, with their original activities.

- Heritage Interpretation:
  - The Aboriginal and non-Aboriginal heritage studies are not integrated. Rightfully so a provision is made for the results of consultation with relevant Aboriginal stakeholders and knowledge holders to be recorded and that continuing consultation with Aboriginal stakeholders occur. The Association asks why similar provisions haven't been made for non-Aboriginal stakeholders.
  - The statement of heritage impact does not include the cessation of heritage rail operations from the largest complete heritage rail workshop in Australia. The Rezoning proposal argues that it does not significantly diminish the heritage values of the LES. The Association strongly disagrees. Operating locomotives have been the emblematic symbol of the LES. How does one compare Australia's finest complete Victorian era, heritage listed rail workshop, with three tiers of "modern" retail and commercial offices where the GFA is 2.5 to 1? Must all of our society's decisions be exclusively commercially based?
  - It does not take sufficiently into account the intangible cultural heritage of non-Aboriginal stakeholders. The documentation is overwhelmingly heritage building focussed. Many examples can be cited. The document "*Large Erecting Shop Rezoning Proposal*" in the section constraints and opportunities at 7.8 Heritage Interpretation - 7.8.1 Opportunities: 13 opportunities are listed and not a single one directly relates to the LES workers intangible cultural heritage. At its peak production the LES employed a thousand workers. The final opportunity listed refers to heritage interpretation opportunities from furniture to way finding. The opportunities list does not include a reference to a mini museum.
  - It does not integrate heritage interpretation with a cultural heritage tourism strategy. A vague reference is made to expand and complete the South Eveleigh Cultural Heritage tourism activities. The quantum leap an operating rail link to the LES would generate for cultural heritage tourism is not addressed although a reference is made to an opportunity for retaining a locomotive in situ on site. This proposal was raised many times in the Heritage Interpretation discussions for the Locomotive Workshop but no progress was made.

## Further Major Issues raised by the State led Rezoning Proposal

### Planning Controls

The Association supports the City of Sydney proposal for incorporating the LES site into Sydney Local Environmental Plan 2012(LEP). The SCC has a demonstrated capacity to deliver high value, large scale urban renewal projects. The Association is concerned about inconsistent planning administration

The Association recommends that

- Planning controls for the LES be incorporated into the Sydney LEP 2012
- Sydney City Council and the CSPC should be the consent authority for all development in the South Eveleigh Precinct.

**Heritage: built fabric.**

The planning proposal does not respect the national, regional and local significance of the built fabric, moveable heritage, intangible cultural heritage and the overall context of the LES within the wider ELW precinct. It does not take sufficiently into account the link between the building and its use as a large open industrial workshop which was involved in the production, assembly and repair of locomotives for the NSW rail industry and the many thousands of workers employed there over the years

The proposed GFA with two additional floors severely restricts the appreciation and characteristics of this large industrial space. The benchmarking case studies are narrow in scope because they do not include examples of industrial facilities maintaining albeit in a limited continuing operational capacity.

The Association recommends

- A hybrid mixed use of commercial and retail office space together with the continuance of a rail operating track to enable heritage locomotives and rolling stock accessibility for enhancing the heritage cultural tourism experience for the Precinct. Appropriate setbacks will be required to accommodate these operational requirements. In addition accommodation should be made available for an Eveleigh Locomotive Workshops archive/ heritage centre/ mini museum.
- Ensure no new openings are established on the southern façade of the LES
- Ensure the overhead gantry cranes can be viewed in the round and give further consideration to opportunities when more information is available following a report into the moveable heritage collection.
- Ensure that the original spatial conception of the LES with its central row of columns is able to be read

**Locomotive Street:**

The Association supports

- The Sydney City council recommendation that planning provisions require compliance to the Councils streets and open spaces codes, policies and frameworks.
- The Association does not support car parking on or near this site and as any transport need has been identified.

**Design Excellence**

The Association does not support the proposal to use a “design excellence” process as opposed to a competitive design process. The Association supports

- The Association supports the SCC recommendation that due to the LES national, state and local significance an Architectural Design competition in accordance with the CCS Competitive Design policy be required.
- Included in the design competition a requirement that the hybrid, mixed use concept, which includes the rail operating capacity, for the LES be included in the design competition. In addition the following matters should be included a competitive tendering process

1. public domain within the site boundary and its integration with the adjacent public domain
2. The public art strategy
3. Heritage Interpretation Plans and Strategies

## **Sustainability**

The Association supports the Council view that the exhibited sustainability targets are unacceptable given that all NSW Government led projects must commit to the Government's target of 50% emission reduction by 2030 and net zero emissions by 2050, for the buildings and in occupancy. The Association supports the various recommendations concerning sustainability made by Council.

## **Transport and Connectivity**

### **Locomotive Street:**

The Association supports:

- The Sydney City Council recommendation that planning provisions require compliance to Councils streets and open spaces codes, policies and frameworks.
- The Association does not support car parking on or near this site as no transport need has been identified.

### **Bridge Connection between North and South Eveleigh**

The Association supports a pedestrian and cyclist bridge connection between North and South Eveleigh. The reduction in travel times for local residents, workers and students together with potential numbers of users underline the need for this important local community infrastructure project to be included as an essential ingredient of the rezoning and LES reuse project. This project has been handballed back and forth for many years. It is time for it to be implemented.

**Green Travel Plans:** in general the public transport availability, except for a few wrinkles is second to none in Sydney for the South Eveleigh Precinct. A consent condition for the Locomotive Workshop was the adoption of green travel plans aimed at reducing the dependence on cars, increasing the use of public transport and relieving the burden of local residents of competition for car parking spaces. These plans should be part of the LES Rezoning.

## **The Rezoning Proposal: Consultation Procedures and Outcomes**

The Association argues from our firsthand experience that the consultation process for the Rezoning has failed at many levels.

The Study Requirements for consultation are set out under 1.2 and Table 1 in the report "*Large Erecting Shop – Consultation Outcomes Report*" (COR).

On the evidence it is clear that the Study has not been able to demonstrate that it has undertaken consultation with either the local community or non-government organisations.

The Report at section 3 sets out Engagement approach and Objectives. The Association argues that a number of aspects of the engagement process have not been met .e.g timely i.e. *“” provide the community and stakeholders with the opportunity to provide feedback prior to lodgement of the Rezoning application.”* Clearly this has not occurred.

Another aspect of the proposed process was: Coordinated, i.e. *“building on the recent renewal of the broader South Eveleigh precinct, engagement activities utilised existing stakeholder channels and groups and continued conversations with highly engaged stakeholders and community members”*. Clearly this did not occur but the question remains to be answered, Why Not?

At 3.1 of the COR, Engagement Objectives are set out and include:

- Clear information to the local community. Very little information was given as evidenced by the drop in session we attended.
- To seek feedback and enable two way discussion around the plans to occur. This clearly did not occur.

Given these factors proactively understanding concerns and identifying opportunities for mitigation was not going to occur nor was documenting feedback able to be undertaken for the Association , local community Groups and volunteers..

**The Association asks that the Department in assessing the responses to the proposal give consideration to setting out clear processes to ensure the Engagement Approach and Engagement Objectives are applied in full to the Association, local community groups and volunteers.**

Table 3 of the COR set out Engagement activities and Audiences. We have earlier described the very limited information made available to the drop in information session and the unilateral disbandment of the Community Liaison Group by Mirvac. The Association argues that the information in this table is seriously flawed.

The COR has not successfully addressed its KPI nor has the engagement approach and objectives under the heading: Coordinated *“building on the recent renewal of the broader South Eveleigh precinct ,engagement activities utilised existing stakeholder channels and groups , and continues conversations with highly engaged stakeholders and community stakeholders.”* been achieved

Clearly this did not occur. Given this shortcoming the Engagement Objectives which included *“to proactively understand concerns that may arise during the planning process and identify opportunities for mitigation”* and *“to document feedback and provide the project time the opportunity to incorporate feedback in to the indicative proposal ”*. This clearly could not and did not occur.

These failures are, the Association believes, grounds for the Rezoning Proposal to be rejected.

The COR at p9 under Heritage it is noted *“Plans for heritage interpretation are at a very early stage, we are still conducting preliminary work .We haven’t yet identified specific elements of heritage interpretation”*

The Association notes that the Rezoning proposal seeks endorsement of the Heritage Interpretation Plan **Stage 1.The Association recommends that the Plan be noted at this early stage. Such details are properly the province of future SSD applications.**

The LES planning documents refer to consultants developing a site specific CMP for the South Eveleigh site. No consultation has occurred in relation to this document. The current CMP produced in 2015 for the ATP was the subject of wide stakeholder consultation.

**The Association recommends that this process should be followed for the development of the South Eveleigh and LES Site.**

The COR in Section 8 Next steps at 8.2 Key action 1. *Community Consultation. A consultation period of a minimum of 30 days will enable the community and any stakeholders the opportunity to provide feedback to the Department regarding the proposed planning controls for the LES site.* This has not occurred. The Association was notified by RedWatch on Saturday 13th November that we had four working days to make a submission. Community pressure saw this date altered to 24 November, still well short of the minimum of 30 days.

From the Associations previous six years' experience there is a structural problem with the consultative procedures. Some organisations are consulted in detail and this starkly compares to non-government, community groups and railway associations where consultation is non-existent or at best cursory.

### **Perceived Failures in Public Policy, Transparency and Accountability**

The Association has been concerned for the entire six years of the South Eveleigh project that the Heritage Council and Heritage NSW do not have the resources or skills to give considered advice on intangible cultural heritage issues. The Association has not seen one comment or document from these organisations concerning ICH during our lengthy involvement in this project. Hopefully the recent review of the NSW Heritage Act will result in the NSW Government taking steps to fill the major gaps in the heritage architecture being addressed.

The failure of government organisations and advisory bodies to provide public policy advice concerning intangible cultural heritage has resulted in it being effectively outsourced to the private sector. The Association believes this deficiency needs to be addressed by Government.

**The Association recommends that transparency and accountability matters can begin to be addressed by the establishment of a forum that brings together all stakeholders interested in heritage interpretation, that it meet regularly and that minutes of the meetings be circulated**

### **Cultural Heritage Tourism**

The Association has many links through its member's involvement in various railway heritage organisations to rail heritage tourism. Much has changed in the rail heritage tourism sector in recent years following a 2013 review and the establishment of Transport Heritage NSW Ltd. The 2017 -18 Annual Report of Transport Heritage NSW reveals a Record of 66,000 passengers carried on heritage trains ,up by nearly 30%

The redevelopment of the ATP/ Eveleigh railway workshops has included the development of a heritage tourism plan which is an integral component of the company's Heritage Implementation Plan. Taking a holistic approach to heritage interpretation makes not only good economic sense in driving

potential customers to the company's retail offering but has demonstrable opportunities to deepen both local and international tourist understanding of, and engagement, with cultural heritage tourism.

The importance of Cultural heritage Tourism to the repurposed South Eveleigh site is highlighted by figures from Destination NSW which show for the year ended December 2018 the share of Cultural and Heritage visitors for: visit history/heritage buildings sites or monuments is 68% for international visitors ; domestic overnight visitors 37% and domestic Daytrip visitors 36%. South Eveleigh and its surrounds has a multitude of cultural and heritage attractions.

Carriageworks across the rail line is the former railway workshop which was transformed into a contemporary arts centre by the NSW Government in 2005. It is the largest multi -arts organisation in Australia attracting over 400,000 visitors per year.

The strategic link between what is the finest example of a Victorian era railway precinct in the world and cultural heritage tourism is, the Association believes, the elephant in the room. There is a reference to the success of the reuse of Carriageworks to become NSW's premier arts district but very little comment about the exciting possibilities for the LES, ELW and ERW precinct it presents for cultural heritage tourism. Perhaps the hyperbole around Tech Central, a new Silicon Valley etc. has blinded many to the heritage tourism opportunities that are in our own backyard.

In 2021 the NSW Legislative Council conducted an extensive public review of the 45 year old NSW Heritage Act. It made 26 recommendations for change. An area to which it directed its investigation was heritage cultural tourism. Under the heading : Improving or activating heritage places for tourism the Inquiry commented: "The Committee acknowledges the pivotal role heritage plays in the NSW visitor economy ...what is lacking is a coordinated and concerted state wide state-wide approach to heritage tourism involving collaboration with key stakeholders such as National Parks, Destination NSW , Heritage NSW and local Councils."

The Committee further observed: *"the Committee also supports the adaptive reuse of public heritage buildings ...the thorough research and assessment with a sound business case and the need to manage heritage items innovatively without diminishing their value."*

The Inquiry, in Recommendation 22 suggested: That the NSW Government

- Ensure agency collaboration on cultural tourism, to stimulate economic growth, promote heritage understanding and awareness in the community, and contribute to the long term conservation and enhancement of heritage places, sites and landscapes.
- Develop a state led strategy for the activation of heritage assets with specific actions for the protection of local and state heritage.

**The Association recommends that the NSW Government establish a Task Force consisting of government agencies, the City Council of Sydney and Mirvac. The role of the Task Force would be to investigate and report upon a plan to establish the Eveleigh Railway Workshops Precinct as a major cultural heritage destination precinct.**

## The 2022 ERW Overarching CMP

Reference is made to the ERW holding special social significance for railway employees past and present, as the home of training for apprentices, tradesmen and engineers with the latest technology being utilised. Reference is also made to numerous union activities and major industrial strikes occurring at the workshops and how ERW unions played a key role in various labour movements, the repercussions of which had major influence on blue workers across Australia. Comment is made about technological advancement.

The Rezoning Proposal refers to sections of the 2022 ERW Overarching CMP. Despite the fact that the CMP was produced without any consultation with heritage stakeholders a number of the recommendations have merit but detailed consideration needs to be given as to how they will be implemented.

**Policy 24** supports public access to heritage places. This principle, from the experiences of the Association in South Eveleigh, can be difficult to achieve in practice. Attention needs to be given to maximising public access, and preventing the locking up, under commercial pressures, vast swathes of reused heritage buildings for 95% of the year and the privatisation of land zoned as public recreation zones.

**Policy 27** recommends a coordinated approach to heritage interpretation is a good policy and argues that each precinct should be interpreted as part of a major railway workshop facility. How this operates in practice needs to be rigorously examined. For example, at Carriageworks there is very little heritage interpretation of intangible cultural heritage. The Association asks how this to be addressed is.

**Policy 28 Associations** The principle of a coordinated story about how the place operated and in particular addressing its functional layout is an important principle. The Association argues the current HIS under discussion should give more attention to this issue.

**Policy 29 Review of interpretation** The policy recommends a review should be open to heritage stakeholders. Funding is referred to but not in any detail. Funding is a complex issue. The Association expresses considerable doubt that a mechanism for upgrades should be considered by all site managers in a collaborative manner. This is a self-regulation model that we do not hold out high hopes for. We are reminded of the self-regulation model in the building industry which caused the Government to intervene. In our view the Government should take the initiative to ensure a funding mechanism that applies to all owners/managers is developed expeditiously. In our view the history of overarching CMPs is testimony to the failure of the current approach.

**Policy 32. Community Consultation** The Rezoning proposal is a model example of failure at every level, except for the Aboriginal community who have fought hard over many years for proper processes. The Association has made a number of suggestions as to how it can be dramatically improved. The adoption of a co-design process would be a major step forward.

## Moveable Heritage

The Association supports the general statement made in the LES Rezoning Document at 7.6 “*this moveable heritage collection is a significant and important resource which speaks to the heart of Eveleigh’s transport history.*”

The Association notes that the summary of recommendations of the document "Large Erecting shop South Eveleigh –Stage 1 Heirtage Interpretation Plan at Summary of Recommendations contains two basic recommendations about the Movable Heritage Collection and both are concerned with the basic first step of establishing an authoritative inventory.

The Association believes there are a number of other issues concerning the moveable heritage collection and they are referred to in the discussion below.

The document "The Large Erecting Shop Non Aboriginal Heritage Study" includes Table 4.1 Preliminary list of moveable heritage items that have been listed on the S170 register (as of 2013). They have been listed as being located within the LES. However during Curio site visit in May 2022, the majority of these items were not located within the building, however a number of heritage listed items noted to be located in different precincts were situated within the subject site.”

For the Association this raises a number of issues given that in 2013 the site had been occupied by a private rail heritage operator for twenty five years and how this long term tenure impacted on the S170 register and the LES moveable heritage collection.

Another issue about the observations made by Curio is they would appear to present a challenge in sorting through what belongs to whom and what its provenance is.

The documents indicate that the RailCorp S170 register (now TAHE?) included a significant number of items of rolling stock and that a number of these had been transferred to the Chullora Rail Heritage Centre. The Association notes that the Paint Shop also has a number of items of rolling stock.

The Association asks are there conflicting objectives amongst some of the heritage stakeholders.

The various documents present a complex situation regarding the LES movable Heritage Collection. The Association makes the following comments

- A preliminary view of the Association is that a moratorium should be placed on items leaving the LES until the inventory studies are completed, the provenance of moveable heritage items determined and their relevance or otherwise to the LES and the South Eveleigh site generally is recorded and discussed between heritage stakeholders.
- In the Associations view a weakness of heritage interpretation for the ELW was the difficulty in explaining the interconnection between the various Bays and their functions and this occurred for a multiplicity of reasons. Given the homogeneity of the LES there is a real opportunity to take an overview of the integrated functional process within the LES in addition to individual heritage items.

The relationship between the LES and the various work functions/processes should be clearly explained in the HIP principles and interpretative elements. This explanation should also include

information on the various classifications of workers involved in the work functions/processes, the conditions under which the work was undertaken and the OHS hazards faced by each classification.

- The impact of the 30 year tenure of the LES by private rail heritage operator 3801, and potentially and other private operators, on the movable heritage collection does not appear to have been addressed in the various documents. The Association asks how much of an issue this is.
- The functional and physical relationship between the LES and the ELW is encapsulated by the traverser. The Association notes the interpretation of the traverser during the ELW heritage interpretation was discussed many times and a decision was always just around the corner but....The Association requests that this issue be prioritised for the heritage interpretation of the LES and it's near vicinity.

## Heritage Interpretation Major Points

The Associations guiding principle is that the tangible and intangible are inextricably linked. *A building or moveable heritage item only has significance in so far as it has a meaning associated with it. "At its heart intangible cultural heritage is held by communities or social groups, is passed down from generation to generation and acts as a reference point between our lives in the present day and our forebears".(Historic Environment, Scotland)*

The focus of the rezoning application has been on heritage buildings and their reuse and the issues potentially affecting the built heritage. The purpose of the building and its production, repair and assemblage of locomotives has been divorced with this almost singular approach. The LES is the largest intact, high quality workshop from the steam era in Australia. The Design Excellence framework is based on prioritisation of six principles, one of which is (QUOTE) heritage conservation and interpretation including celebrating the sites diverse history. This requirement has not been met in a number of instances. For example the era of steam locomotives is not included nor is the 30 year occupation of the LES by 3801 Ltd. The hundreds of volunteers involved in this important chapter of the LES were not consulted.

The Heritage interpretation Plan aims to set out key themes, social values and interpretative opportunities. Unfortunately in our view it has not succeeded. The Association notes with approval several positive comments relating to the role of unions and the special place that the ERW precinct holds for rail workers. However these sentiments are not reflected in the various Rezoning Proposal Documents including the LES Stage 1 Interpretation Plan and the LES Non Aboriginal Heritage Study.

Examples of further Issues to be addressed at the LES.

- Occupational, Health and Safety. This is recognised as major issue for the LES and has yet to be given the attention it deserves in Heritage Interpretation. The Association recommends that as part of the heritage interpretation for the LES a Works Memorial Wall be constructed. It could form part of the Public Art Strategy. It would include a listing of all workers killed or seriously injured on the job in the ERW precinct. There are many precedents for this type of Memorial Wall.

- The documents contain an example of work to be examined and reference is made to the work of fitters. There were a wide range of classifications employed at the LES with up to a thousand employed at any one time. A wider range of classifications should be examined. The essence of much of the work at the LES was based on teamwork and the work of teams should be examined.
- An interpretative element that needs more attention is the relationship between the LES and the various components of the locomotive which were then distributed to the various specialised Bays of the ELW needs to be given more attention to. This is capable of interpretation in a number of ways.
- Despite general references to the importance of unions little specific details of prominent unionists and workers and Eveleigh workers who became politicians, premiers and or governor generals has been the subject of heritage interpretation. For example the lives of two of ELWs most prominent unionists could be represented on the two new annexes proposed for the LES as part of the reuse adaptation. Other prominent unionists and politicians could be represented through a number of interpretative media including the Public Art Strategy.
- A fleeting reference in the HIP is made to the possibility of the LES hosting a mini museum. This and similar suggestions, such as archive/ research centre have been raised on a number of occasions in but have not been proceeded with. An earlier LES CMP proposed that the LES be repurposed as a museum. The new suggestion needs to be given serious consideration that goes beyond a thought bubble.
- The references/original research upon which the heritage interpretation has been based is very narrow. A total reliance on work undertaken for the ELW has many shortcomings. The historical research for the site has been focussed on the ELW and the LES has been largely overlooked. The need for further research on intangible cultural heritage has been recognised in the Overarching CMP.
- For the wider Eveleigh Railway Workshop Precinct the effluxion of time has raised the bar for appraising and recognising intangible cultural heritage because it is now thirty five years since the workshops closed and the remaining ex-employees has diminished significantly. The description by Professor Taksa that only "industrial ghosts" remain is particularly poignant.

However this is not the case with the LES. The many volunteers who underpinned the 30 year operation of the 3801 tenancy until 2017 present a rich vein of historical material and interpretative opportunities. Yet they have been totally ignored in the process of formulating the Rezoning Application.

- The change from steam to diesel was the greatest operational and technical challenge faced by the NSW Railways. This was especially true for the LES. This theme should form an important component of heritage interpretation.
- The classification of locomotive Driver is an important part of the history of the LES and their stories need to be told, this should include the history of the Eveleigh Barracks.

## **Interpretative Framework**

The Association believes the current plan does not incorporate important components of the LES sites history and is not inclusive. The Association has in its submission put forward a number of alternative

options as referred to above and set out in Appendix A below using Australian and NSW historical themes and their potential application to the LES.

### **Key Stories for Interpretation in the LES.**

The Association believes that all the key themes put forward by the Association yield many storylines. The historic themes and storylines identified above by the Association are capable of providing many examples of specific stories and that can be explored through future heritage interpretation consultative processes.

**The Association recommends that further work on the HIP stage 1 for the LES be suspended pending consultation with heritage stakeholders. This consultation to be based on the principle of inclusion and the undertaking of further research on the Moveable Heritage Collection and ICH at the LES.**

### **HIP Stage 1 Recommendations:**

The Association agrees that an inventory and assessment of all moveable heritage items of significance must be undertaken and where it exists already updated. Where applicable, recommendations should be made to repair movable heritage items. A number of issues will flow from this assessment. The assessment should address the possibility for items to be made operable and where ever possible assemblages be given a high priority. The Association has made a number of recommendations in our Moveable Heritage section.

**The Association recommends the incorporation of the following into the non-Aboriginal HIS recommendations**

- Co-design with heritage stakeholders of interpretative elements
- Coordinating with the Public Art Strategy
- The establishment of a reference group of major heritage stakeholders to guide, direct and inform the process from beginning to end.
- Using the full potential of interpretative media including: interpretative panels, public art, temporary hoardings, interior spaces, on line interpretation and off site digital engagement
- Implementing the recommendation of a number of CMPs that considerable research potential exists through the physical, documentary and oral evidence of the functions and activities undertaken at the LES.
- Programmes, tours and the development of education modules aimed at both the public and student groups etc. relating to the LES is prepared as part of the precincts cultural tourism heritage offering.

**Submission prepared on behalf of the RTBU Retired Members Association by:**

**Roger Jowett**



## ANNEXURE A

AUSTRALIAN THEME	NEW SOUTH WALES THEME	PROPOSED LES THEME	THEMATIC STORYLINE
Peopling Australia	Migration	Experiences of migrant workers	<p>The post WW2 impact of migrants in the LES, ERW and NSW rail industry.</p> <p>Numbers, jobs occupied, difficulties encountered. Lack of promotion. English classes for migrants and the role of the ARU and union activist Louis Cavalieri.</p> <p>The experiences of migrants with ERW, LES closures.</p>
Developing Culture Life	Social institutions	Social Clubs and cultural events	<p>Unions in the organised picnic days and social club activities. Many Social Clubs were formed and LES workers were active in local sporting clubs.</p> <p>Monthly concerts and social events were organised with many well-known artists performing.</p> <p>The ARU held drama and cultural events and organised classes at the Union's Redfern Headquarters. The ARU also organised its own sporting teams.</p>
Governing	Defence activities	LES, ELW contribution to the war effort	<p>Many railway workers enlisted in the armed forces and many hundreds were killed and were commemorated in Honour Roll boards at ERW. There is an existing hour board at the LES which should form part of the HIP.</p> <p>Role of LES in defence production.</p> <p>Air raid shelters, for example, were manufactured at ERW.</p>
Working	Labour organisation	ARTSA/ARU Union organisation and activities	<p>The first all grades industrial union in the NSW rail industry formed in 1886 at a meeting in Redfern.</p> <p>The ARU established its headquarters in Redfern in 1931. The building is</p>

			<p>currently undergoing assessment for listing on the NSW Heritage Register. The Union organised a band, sporting teams and assorted cultural events at the Unions Redfern headquarters.</p> <p>Many union officials originally came from ERW.</p> <p>Shop Committees were first organised at ERW in 1924 – outline the role of Shop Committees and the many prominent unionists at ERW.</p>
	Work practices and innovative processes	Recognition of the skills of the trades and apprenticeship and training system	<p>ELW and the LES were renowned for their skills and high standard of training for apprentices.</p> <p>Up to 1000 workers were employed at the LES  Expand recognition beyond fitters and tradespersons e.g overhead crane drivers, tradespersons assistants, train drivers etc.  One focus could be on teamwork another on the conditions under which the work was performed.</p> <p>NSW Railways were famous for their apprentice training system.</p> <p>An important work/skills issue was the transformation of locomotive power from steam to diesel and the different skills required and the views of the various work classification impacted by this major transition in the rail industry.</p> <p>An important but overlooked element of the workforce is the skills possessed by the army of volunteers who underpinned the work of 3801 at the LES for 30 years. What is being done to ensure these skills are available for the future rail heritage industry?</p> <p>Were there any women workers at the LES?</p>
Developing local, regional and national economies	Activities and processes	Fighting for industrial and social change at Eveleigh	<p>Detail the key strikes, demonstrations and industrial negotiations at ERW including the LES that established benchmarks for wages and conditions which flowed on to/were applied in a range of industries.</p>

			<p>Use examples of conditions and amenities at the LES, ELW and ERW.</p> <p>Use a timeline to describe the major changes in wages, conditions and job security.</p> <p>Describe the fight to reinstate the Lilywhites at ERW and the LES and campaigns for worker's industrial rights.</p> <p>Showcase the shop committee newsletter /magazine.</p> <p>Analyse the various social and political causes pursued by shop committees at ERW, ELW and the LES. For example, peace and anti-war campaigns exemplified by opposition to nuclear weapons, Vietnam war etc.</p> <p>Tell the story of why and how ERW,ELW and LES unionists fought for indigenous land rights such as the Wave Hill walk out and equal pay for Aboriginals at ERW etc.</p> <p>Include a range of interpretive elements and features such as murals and installations in the LES Precinct that recognises and commemorate the industrial and social history of the LES workers. Integrate the LES workers into the Public Art strategy. The multitude of different steam locomotive types and their idiosyncrasies provides fertile ground for the public art strategy.</p>
Developing local, regional and national economies	Activities and processes	How did the LES fit into the wider ELW?	<p>Describe the production processes at the LES and how and where various components were distributed from the LES. Give practical expression to the newspaper quote that the LES "was both the birthing chamber and surgeons table for the Locomotives at Eveleigh.</p> <p>Outline the systems of moving locomotives around the LES and the role of the traverser in connecting both workshops.</p> <p>Describe the treatment of special carriages such as the Royal and</p>

			Governor General's Cars, top of the line intrastate and interstate expresses.
Developing local, regional and national economies	Technology	The application of technology to the LES	<p>The LES is important in terms of technological development and innovation and this part of the Workshops history should be examined. Examples include:</p> <ul style="list-style-type: none"> <li>• The transition from steam to diesel locomotives</li> <li>• New locomotive designs, materials and components</li> <li>• LES initiated technical solutions to locomotive operational issues</li> </ul>
Developing local, regional and national economies	Towns, suburbs and villages	Include surrounding suburbs – Redfern, Erskineville and Alexandria	Include reference to the links between workers their local communities and their pubs, social and sporting clubs, political parties and religious organisations.
Marking the Phases of Life	Persons - Activities of and associations with identifiable individuals	The influence of ERW, ELW and LES workers on the ALP	<p>The ERW, ELW and LES was instrumental in providing many (23) state and federal Members of Parliament. The first Labour Premier of NSW was J. McGowan and J.J Cahill was also a Labour Premier of NSW.</p> <p>Examine their working and political lives and include portraits and biographies of all politicians who worked at ERW as part of heritage interpretation.</p>

**Submission number:** 9

**Submitted on:** 24 November 2022

**Submission type:** I am submitting on behalf of my organisation

**Name:** REDWatch

**Suburb and postcode:** 2016

**Please provide your view on the project:** I object to it

**Submission:**

## **Submission on Large Erecting Shop rezoning proposal**

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### **REDWatch interest and history with the site**

#### **REDWatch was established to monitor such sites**

This submission is made on behalf of REDWatch Incorporated (REDWatch). REDWatch was set up in 2004 with the following objects in its constitution:

*REDWatch is a group of community residents and friends from Redfern, Waterloo, Eveleigh and Darlington who support the existing diversity in these areas and wish to promote sustainable, responsible economic and social development.*

*REDWatch recognises the importance of the Aboriginal community to the area.*

*REDWatch has been formed to:*

1. *Monitor the activities of the Government (local, state and federal), the Redfern Waterloo Authority, and any other government instrumentality with responsibility for the Redfern, Waterloo, Darlingtown and Eveleigh area, to ensure that:*
  - (a) The strategy benefits a diverse community*
  - (b) Communication and consultation is comprehensive and responsive*
  - (c) Pressure is maintained on authorities*
2. *Provide a mechanism for discussion and action on community issues.*
3. *Enhance communication between community groups and encourage broad community participation.*

*This may involve: Holding regular meetings; Holding community forums and other events; Establishing a website; Communicating with the community through other means; Meeting with government representatives and authorities; Cooperating with other community organisations; And any other means the association deems appropriate.*

REDWatch makes this submission on the Large Erecting Shop (LES or Large) rezoning proposal in line with these objects.

REDWatch welcomes the opportunity to comment upon this planning proposal.

## **REDWatch interests and history with the Large Erecting Shop (LES)**

The Large or the LES is the large shed to the west of the Locomotive Workshops which is also to the North of the Channel 7 building and opposite Carriageworks. It is in the gap between the Locomotive Workshop and the LES where REDWatch, ARAG and FOE have been pushing for the construction of the bridge linking North and South Eveleigh that was promised by the Redfern Waterloo Authority (RWA) in 2006.

REDWatch has had an active interest in the LES site from the early 2000s when the Redfern Waterloo Partnership Project (RWPP) and then the Redfern Waterloo Authority (RWA) took an interest in the site.

REDWatch opposed the RWA proposal that the LES be pulled down and replaced with a 12 storey building. REDWatch worked with railway heritage groups and ex-workers on the site to substantiate the structural integrity of the building so as to save the existing building and to allow for ongoing active railway heritage use of the building.

REDWatch was pleased that one of the last things done by the RWA, as it morphed into the Sydney Metropolitan Development Authority (SMDA), was to recognise the soundness of the building and to return the planning controls to existing height. Rather than the proposed residential zoning, the LES site was zoned to its current 'Special Purpose Zone – Infrastructure' with a site-specific clause (clause 23A, Appendix 3, Precincts SEPP) that also allows development with consent for the purposes of 'information and education facilities' and 'rail infrastructure facilities'.

At that time the LES was where heritage railway operator 3801 Ltd stored its rolling stock along with some other heritage operators. 3801 Ltd also operated tours from Central Station using the LES as its staging post. Many railway heritage volunteers worked in the LES. There was a push at the time by groups like Friends of Eveleigh for the LES to be used as a Sydney-based heritage and tourism centre - [Friends of Eveleigh - Concept Plan for the Large Erecting Shop](#).

The LES continued as a heritage operational base until 2017 when 3801 Ltd were asked to vacate and the dream of the LES as a heritage rail operational site came to an end. On 30 November 2018 Transport for NSW announced a new heritage transport centre at Chullora. The [media release and factsheet](#), made specific reference to the Large Erecting Shop (LES) saying "the Government is committed to the preservation of important buildings including the Large Erecting Shop and Broadmeadow Roundhouse which will be adapted for new uses."

Like the Paint Shop and Clothing Store Precincts in North Eveleigh, the LES is owned by Transport Asset Holding Entity NSW (TAHE) and managed by Transport Heritage NSW (TfNSW).

In 2015 when Mirvac purchased the Australian Technology Park it obtained rights to negotiate for the LES should it become available for redevelopment. After an unsolicited proposal in October 2018, Mirvac entered into a cooperation deal with TfNSW on behalf of TAHE to start the planning for the site redevelopment. The LES continues to store heritage rail assets awaiting the completion of the Chullora facility.

## REDWatch interests and history with the ATP / South Eveleigh

REDWatch has also had an active interest and involvement over a similar timeframe in the former Australian Technology Park (ATP) which now operates as South Eveleigh. REDWatch has been instrumental in the campaign to retain an active blacksmith in Bays 1&2, in pushing for the preservation, interpretation and access to heritage items within South Eveleigh.

REDWatch has also been active during Mirvac's ownership of the site, sitting on its Community Liaison Group and the South Eveleigh Advisory Panel. REDWatch has been active in seeking to gain the best possible heritage outcomes from the redevelopment and its heritage interpretation.

Upon the sale of the ATP, REDWatch requested the City of Sydney to undertake a Risk / Benefit Analysis of the sale which lead to the UrbanGrowth including positive covenants and easements on the sale.

These protections included Positive Covenants and Easements to protect public access to this privately owned land and its facilities. It also made Mirvac treat heritage equipment in the same way it would be treated if still owned by government, including maintaining an ongoing Section 170 Register. It also included a covenant to allow a cross-railway connection bridge to land on Mirvac's land as well as the right to access the heritage items held at South Eveleigh.

When the LES is transferred to Mirvac / South Eveleigh, REDWatch is keen to see the protections put in place by UrbanGrowth on the ATP sale to also apply to the LES site so common access and heritage provisions and protections apply across the entire South Eveleigh / LES combined site. The transfer of roadways etc. to Council should also be aligned.

***REDWatch recommends TAHE extend the UrbanGrowth NSW access and protections for South Eveleigh to the LES and the area around it which is transferred. The easements currently sit with the City of Sydney following the windup of UrbanGrowth.***

## NSW Government Conflicts of Interest need to be recognised and managed

REDWatch is concerned that the transfer of the LES to Mirvac from government involves a number of government players which have an interest in the outcome of the rezoning. This includes what gets transferred to Mirvac as part of the transfer of control of the site to Mirvac. While some of these conflicts are outside the scope of the rezoning proposal they influence and impact it and are hence relevant to consideration of the rezoning proposal. Some of those with conflicts are:

- **Transport Asset Holding Entity NSW (TAHE)** – owner of the site and looking to get best return from the LES as well as North Eveleigh without paying for the long promised connection between the two sides of Eveleigh, which would significantly benefit the community, heritage interpretation, connectivity and business including the Technology Precinct on both sides of the railway line.
- **Transport for NSW (TfNSW)** – acting on behalf of TAHE to get best return on the site. The Minister for Infrastructure, Cities and Active Transport Rob Stokes has carriage for the divestments at Eveleigh by TAHE / TfNSW but is also responsible for the Active Transport that would be furthered by the pedestrian and bike connection for which TAHE is prepared to say could be built but will not pay for at Eveleigh while proposing three bridges as part of its Central redevelopment.
- **Transport Heritage NSW (THNSW)** – current occupier of the site with a say in what heritage equipment and materials connected to the LES stay at the LES or move to Chullora. THNSW

also owns rolling stock and locomotives made at Eveleigh that could be used for heritage interpretation at the LES and other parts of the former Eveleigh Railway Workshops. If THNSW leaves no equipment at the LES then there is less available for interpretation and more space for commercial floor space and potentially a higher price for TAHE.

- **Department of Planning (DPE)** is handling the rezoning on behalf of TfNSW on government owned land rather than the City of Sydney. The proposal is that DPE will be the Consent Authority for the DAs for this site rather than the City of Sydney. DPE also hold the funds in the RWA Contribution Plans. These plans have been collecting funds for infrastructure including the bridge between North and South Eveleigh in the Contributions Plan. With the wind up of UrbanGrowth which sold the ATP site, the NSW Government also pocketed the contribution towards half of the pedestrian bridge promised by ATP.

REDWatch makes the following recommendations to try and deal with these potential conflicts of interest.

### Council should be the consent authority

Given these potential conflicts REDWatch does not want to see another incidence where the government as decision maker and as landowner, impose development controls that benefit the government body but which work against the interests and concerns of the communities surrounding the site. Council, unlike the NSW Government, does not have a financial interest in the outcome and should have handled the rezoning and should be the consent authority for all the future development applications.

### Identify the moveable heritage items associated with the LES

REDWatch notes that the Non-Aboriginal Heritage Study p16 states: "The scope of the Rezoning Proposal does not include specific details about the proposed treatment, management, and incorporation of the significant moveable heritage collection associated with the LES".

REDWatch argues that identifying the moveable heritage that should be incorporated into the LES heritage interpretation is central to any decision about how much commercial floor-space should be allowed. Transport Heritage not only needs to identify the equipment that is associated with the LES it needs to transfer the equipment to Mirvac to be handled under the S170 Register Mirvac is required to maintain.

There has been a history of losing heritage items when the government owned the former ATP that became evident at each update of the heritage register. No equipment to display equates to more usable commercial floor space.

Prior to floor space being allocated, TAHE, TfNSW, Transport Heritage NSW and Mirvac need to determine what S170 items belong to the LES and will be available for heritage interpretation. The list in the Heritage Study indicates items currently in the LES, some of which will move to Chullora when there is space for them. Other parts of TfNSW may also hold equipment of heritage significance to the LES.

Clearly Mirvac and TAHE want to fit the maximum floor space into the LES shell. Transport Heritage needs to honestly identify relevant machinery and transfer it to the LES.

Space in and around the LES must allow public access to the machinery collection within the LES at least for heritage events and preferably items should be totally visible from the publically accessible areas of the LES. Heritage items should not be privatised into tenant only areas.

Special consideration should be given by Transport Heritage NSW and TfNSW to locate of at least one locomotive that was constructed at the LES for heritage interpretation purposes on the site.

If THNSW leaves nothing then the LES will have a different outcome to the rest of the Locomotive Workshop where there is a significant movable heritage collection that has been displayed and helps tell the story of the site, its occupants and manufacturing processes.

## Keep an active rail line into or alongside the LES for heritage visits

While the rest of the ATP has not been used for its original rail purposes for decades, the LES has been used in this way and has active connections to the rail network. Even though Transport Heritage plans to have no ongoing involvement at Eveleigh, Mirvac has invested substantially in the Railway Heritage interpretation at South Eveleigh. This should mean that the plans by Mirvac for heritage tourism and ongoing curation of displays will make South Eveleigh a heritage destination. This destination would greatly benefit from keeping open the possibility for heritage locomotives and trains to visit the site for special occasions. Just because Transport Heritage ceases to have a direct interest in the site, provision should be protected for future heritage rolling stock visits.

The LES and the line to its south, are among the last active connections to the rail network. To facilitate visits for heritage rail equipment to South Eveleigh an active line to the rail network should be retained. This could be on the line to the South of the LES or a line within it. If an active line is lost it will never return and we will have a heritage rail precinct that is inaccessible for functioning railway heritage assets.

## Plan for the former Eveleigh Railway Workshops precinct as a whole

TAHE and TfNSW keep putting out plans for parts of the Redfern Station and Eveleigh Railway Workshops precinct, rather than planning across the entire site. This planning promises connectivity while avoiding the connectivity between the two sides of the rail corridor and the benefits that would flow from the two sides being connected. The new Southern Concourse at Redfern Station does not provide that connectivity and saves only 5 minutes on the 25 minute walk from the LES to Carriageworks.

Planning for the LES, North Eveleigh and Redfern Station must compliment what has already been achieved at South Eveleigh so there is a uniform approach to the sites' heritage across the entire former Eveleigh Railway Workshops site.

## Plan for the pedestrian and bike connection across the corridor

**TAHE / TfNSW must include a provision for the proposed bridge to land in South Eveleigh between the LES and the Locomotive Workshop.**

On the North Eveleigh side TAHE / TfNSW acknowledged that there was interest in a bridge connecting North and South Eveleigh and said it would be possible to land on the North Eveleigh site even if the bridge was out of scope and not being funded by government – see [Eveleigh Link Bridge - North Eveleigh Bates Smart Page 324](#). The community has been running a campaign to [Build the Bridge!](#)

On the South Eveleigh side, where the bridge would need to land near the LES, there is no mention in any document of any possibility of a pedestrian and cycle-bridge nor what provision is being made by TAHE / TfNSW for it to land on the southern side of the railway corridor. Mirvac has been on record as supporting such a connection and the ATP sale to it includes an easement to allow a bridge to land on its land.

TAHE / TfNSW must deliver on the promised (and historical) connection especially now TAHE is benefiting from the redevelopment on both sides of the railway line (North Eveleigh and the LES). In the Clothing Store Precinct TAHE is holding on to parts of North Eveleigh rather than selling it all off to a developer. As a long term investor in North Eveleigh, and possibly the LES, TAHE would stand to reap a significant long term benefit from a connection between North and South Eveleigh and the pedestrian flows and commercial opportunities it would create.

The proposal for such a bridge exists in the final Redfern Waterloo Authority (RWA) Built Environment Plan One and in the North Eveleigh Concept Plan (2008) which are still in effect. The

RWA Contributions Plan lists the bridge as an item for which it has been collecting developer contributions since 2006.

The bridge is now proposed in the position originally proposed by the RWA, rather than that shown in the 2008 Concept Plan. This is because the Southern Concourse at Redfern Station will provide some improved connectivity towards the station. Even with the Southern Concourse, a pedestrian bridge at Carriageworks will cut 15-20 minutes off pedestrian movements from Alexandria / Erskineville to Carriageworks / Sydney University.

REDWatch welcomed the North Eveleigh master plan reference to the possibility of a bridge in the location requested by the community that would connect towards the LES.

In the Urban Design Study for the Paint Shop Precinct there is the single page assessment of a pedestrian link bridge between North and South Eveleigh (page 324). The last sentence on that page states *“Detailed consideration is outside the project scope and does not have NSW Government funding”*. The LES rezoning makes no reference to the bridge or where it will land near the LES.

TAHE needs to commit to the bridge and make the necessary agreements within the sale / leases on both sides of the railway corridor about who will pay for the bridge and / or what the cost split basis will be.

Either way the bridge needs to be referenced in the LES rezoning. The inclusion of a bridge would turn the LES from an isolated corner of South Eveleigh to the centre of a high pedestrian linkage between Sydney University / Carriageworks and South Eveleigh / Waterloo / Alexandria / Erskineville.

With contributions collected for the delivery of the bridge under the RWA Contributions Plan and recovery of ATP funds to deliver half the cost of the bridge (2011 version of the Contributions Plan), the NSW Government has both an obligation to deliver this promised local infrastructure that in 2011 was still rated for the earliest delivery. It also retains most of the funds towards paying for the bridge.

TfNSW / TAHE are in the process of selling / leasing both the LES and the Paint Shop Precinct and yet neither proposal addresses the benefits of a pedestrian and cycle-bridge connecting both sites.

REDWatch can only conclude that TfNSW / TAHE are doing the minimum necessary to get the best sale price for the sites and that factoring in the needed cross railway connection would eat into the returns that TAHE will achieve from the sale / lease. REDWatch notes that the indicative master plan for development around Central station includes three proposed railway corridor crossings and yet nothing is proposed for Eveleigh. Both are supposed to be part of the new Tech Precinct.

REDWatch can only conclude that the NSW Government is not really interested in improved connectivity, productivity and investing in Eveleigh Railway precinct, otherwise it would be investing in such a connection as part of Redfern North Eveleigh and the LES.

For REDWatch the sale / lease of the LES to Mirvac without a pedestrian / cycle connection cannot be supported and TfNSW / TAHE needs to come back with an amended proposal that honours this long term commitment to the community.

## Money already collected for connecting bridge

As REDWatch has pointed out during the North Eveleigh exhibition, the NSW Government has been collecting funds towards such a bridge as part of the Redfern-Waterloo Contributions Plan. In addition when the Australian Technology Park (ATP) site was sold, the NSW Government pocketed the money that the ATP had separately committed towards building the bridge. In the 2011 RWA Contributions Plan, ATP had committed to pay for half the cost of the bridge. In short the NSW Government has been promising this connection since 2005 and collecting funds for it but are now saying it won't deliver the bridge.

## Heritage protections need to be key consideration in rezoning

The LES site is on the State Heritage Register and is listed on the heritage buildings map for the precinct. The exhibition documents include heritage studies and an interpretation plan. The

Overarching Eveleigh Workshops Conservation Management Plan (CMP) gives the LES a high heritage value. The Overarching CMP describes the Large Erecting Shop (1898-1906) as:

*Rectangular building, approximately 185 metres in length (running east-west) and 36 metres in width, formed as two parallel bays with gable roofs. It has brick masonry load-bearing walls laid in English bond with double semi-circular arched windows in corbelled and polychrome brickwork. Internally, cast-iron columns support steel roof trusses clad with corrugated metal sheets and clear alsynite panels and overhead cranes run the length of both bays.*

Like the Paint Shop Precinct there is at the LES a playoff between heritage significance and redevelopment floor space. Council has indicated that it thinks the floor space is excessive and it is concerned that the introduction of two internal floors will take away from the scale and characteristics of the large space linked to its historic use and the low ceilings will result in poor amenity. REDWatch supports that view.

## The Overarching Conservation Management Plan for heritage

Heritage considerations are central to the rezoning and redevelopment of a State Heritage Registered item like the Large Erecting Shop. In the North Eveleigh Paint Shop exhibition the community saw for the first time the Overarching Conservation Management Plan (OCMP) for the entire Eveleigh Railway Workshop (ERW) heritage precinct. The OCMP was updated for the Paint Shop Exhibition and this is the link to it - [Updated Eveleigh Railway Workshops Overarching Conservation Management Plan](#).

The OCMP considered the heritage values of the overall Eveleigh site and created seven overarching heritage management principles with 32 accompanying policies to ensure that the state heritage values of the overall precinct are maintained as part of any future development.

The OCMP Eveleigh Railway Workshop (ERW) Heritage Management Principles are reproduced below to guide heritage discussion about the LES which is covered by the OCMP:

- HMP 1. All future decisions should be based on an understanding of the heritage values of the place and with a view to retain the identified significant values.
- HMP 2. A coordinated approach to management of the individual precincts and areas within the ERW site should be undertaken by future owners to ensure that future decisions are based on consideration for the heritage significance of the whole ERW and its overall presentation.
- HMP 3. The ERW site is assessed as being of state significance and therefore any future owners and managers of the site and its individual precincts should manage the place in accordance with best-practice heritage guidelines.
- HMP 4. Proposals for change should not unduly affect the significant heritage values of the ERW site and its individual precincts and should facilitate understanding of the place and its heritage values.
- HMP 5. The history and significant values of the ERW site and its individual precincts should be interpreted, including within any future redevelopment and reuse of the site where existing elements are to be removed or modified. The place should be interpreted as a major railway workshop facility.
- HMP 6. Skilled conservation professionals should be engaged to advise on, document and/or implement conservation and upgrading work and future development proposals for heritage assets of the ERW site and its individual precincts.
- HMP 7. Planning for new development, adaptive reuse of heritage assets and heritage interpretation should include opportunities for community consultation.

These overarching principles should guide the redevelopment of the LES and hence provide a measuring stick for the assessment of submissions. REDWatch supports the applications of these principles for decisions about the LES.

## Heritage equipment associated with the LES needs to be identified displayed and interpreted

REDWatch has emphasised earlier the importance of heritage machinery associated with the LES to be left in the LES or returned to the LES by Transport Heritage NSW. For the LES to function as a part of the heritage precinct equipment related to its functions needs to be on site and displayed. The amount of heritage equipment needed to be displayed will impact the floor space needed for this heritage purpose.

## Preserve heritage vistas within the LES

REDWatch welcomes the planned proposal for the eastern end of the LES to be open to retain the sense of scale across the building.

REDWatch is concerned however that the east west scale of the building has not been similarly preserved. The narrow separation between the development within the LES shell and the LES is insufficient to give a true sense of the length and former purpose of the building.

REDWatch thinks it would be more appropriate for one track within the LES to be exposed for the full length of the building. This would enable space for 170 items and for the interpretation of how the building was used.

If handled well, the LES could be a heritage complement to Bays 1 and 2 in the Locomotive Workshop and an opportunity for heritage interpretation and heritage tourism.

REDWatch is also concerned that the loading bay on the south western end of the LES will interrupt the east-west vista if it is on the southern side of the building, so a northern vista may be preferable to a special treatment of the loading bay to provide some transparency and a sight line to the western door.

## Proposed land use

The current rezoning seeks to change the zoning for the land to 'Business Zone – Business Park' under the Precincts - Eastern Harbour City SEPP to allow for a mix of commercial and retail development, the same zoning as the surrounding South Eveleigh park. REDWatch would like to retain the possibility for the LES to continue to play some heritage role. We would hence recommend that the existing site-specific clause (clause 23A, Appendix 3, Precincts SEPP) that also allows development with consent for the purposes of 'information and education facilities' and 'rail infrastructure facilities'. This would enable a part of the LES to be considered for heritage tourism as suggested by Council. REDWatch would support such a use.

It is important, especially if the site can be connected to North Eveleigh that the use of the site fits with the areas Tech Precinct aspirations. We support the Council proposal that some affordable work spaces should be considered to ensure a mix of incubation as well as established businesses.

## Proposed building height

The building height remains the existing height but with flexibility for minor protrusions of up to 1 metre for roof plant, machinery and cooling towers subject to consent authority approval. REDWatch has no concerns with this proposal as long as the height protrusions occur between the peaks of east west ridge caps and do not adversely impact the end-on views of the LES.

Having fought hard to retain the existing building REDWatch supports the retention of the heritage building and its fabric both outside and inside.

## Proposed building floor space should be reduced

The proposal takes a high open production building and in effect puts 3 floors of offices into the building. The internal floor footprint of the LES is approx. 6,000 sqm and the rezoning proposes

15,000 sqm equating to a Floor Space ratio of 2.5:1. The Explanation of Intended Effects lists those items not included in floor space calculations such as loading docks, lift wells, cooling towers etc. The quantity of floor space requested will have the effect of removing much of the scale of the original building when inside.

REDWatch agrees with Council that introduction of two internal floors across most of the width of the building will take away from the scale and character of the large space linked to its historic use. Introducing the larger voids we have suggested will require a decrease in floor space, but result potentially in a better balance between commercial and heritage values in this state heritage listed building.

REDWatch hence is of the view that, subject to testing, a Floor Space Ratio (FSR) of 1.8:1 – 2:1 would be more appropriate than the 2.5:1 proposed for the three level development proposed within this heritage building.

REDWatch cannot support the proposed 2.5:1 FSR.

## Parking

The RWA planning controls for the ATP / South Eveleigh Site of set a maximum parking level cap of 1600 spaces. As this cap has not been reached the rezoning proposes 20 car parking spaces be provided at street level alongside the LES.

REDWatch sees no justification for on street parking. The site is in close proximity to railway connections and with the pedestrian bridge it would be even more accessible from Sydney University and the Tech Precinct to the north, especially by bicycle and foot.

In addition the provision of parking will alienate potential public space along the southern side of the LES in an area with little public space. This space would be better as part of the public domain.

Parking alongside the LES is not supported by REDWatch. If necessary Mirvac could make available access to its existing parking for new tenants if considered essential for a tenancy.

## RWA Contributions Plans

The RWA set up separate Contribution plans for Affordable Housing and local infrastructure delivery separate from the Council plans. With the demise of UrbanGrowth these funds have disappeared within Infrastructure NSW and DPE. There no longer exists a body with responsibility for the old RWA area and hence there is no party well placed to make decisions about the best use of these funds.

REDWatch has suggested that funds in RWA Contribution Plan funds should be used towards the construction of the connecting bicycle and pedestrian bridge. Half the cost of the bridge should be clawed back from the sale proceeds of the ATP to honour the undertaking that the ATP would fund half the cost of the connecting bridge.

Affordable housing contributions, including from the LES redevelopment, should be committed to fund additional affordable housing in the Redfern Waterloo area, possibly for Aboriginal housing.

The contributions plans should then be wound up and future contributions made to the City of Sydney contributions plans.

## Support for City of Sydney's concerns

Council made public the [City of Sydney Submission on Large Erecting Shop Rezoning Proposal](#) when it was made available to a Council Meeting. REDWatch is in general agreement with the issues raised by council, some of which we have covered in this submission.

We note and support in general terms the Council's submission in areas not already covered especially as it relates to the City's recommendation that the application be subject to a design competition. Given the need to maintain sight lines and to maintain internal vista the highest quality design will be required.

We further support the City's recommendation that the project must be informed by the Connecting with Country Framework, in accordance with the Government Architect NSW policy. This is especially so given the importance of the area to the local Aboriginal community.

Given global warming REDWatch also supports the City call for higher sustainability targets in its development, operation and waste management.

## Conclusion

While REDWatch welcomed the extension of the exhibition, we only had a little over 2 weeks to alert the community, solicit feedback and to prepare our submission. This submission is more rushed than we would have liked and has not even been proof read.

In this submission REDWatch has outlined our long term interest in the LES and the surrounding elements of the former Eveleigh Railway Workshops. We have raised concerns about the potential for conflicts of interest by the government players to deliver outcomes that might be in the interest of the NSW Government at the expense of the community. We have made some suggestions about some ways in which those conflicts could be managed.

Of particular concern is the need for heritage items associated with the LES to be transferred to Mirvac under s170 obligations. We have also argued that an active link for heritage purposes should be retained and that the NSW Government needs to deliver the pedestrian and bike bridge promised by the RWA and for which the government has been collecting contributions and pocketing funds promised by the ATP for the construction.

REDWatch has also argued that the sites State Heritage listing and the OCMP should be the yardstick for assessing the trade-off between heritage values and the adaptive reuse. As part of that we have argued the FSR needs to be reduced to open up longitudinal vistas and interpretation within the LES and that this requires a reduction in the FSR requested. We have also made other suggestions relevant to the rezoning.

REDWatch appreciates the opportunity to comment on this planning proposal and trusts that our comments and those of community members will be given a weight equal to government stakeholders.

Thank you for the opportunity to comment on this proposal

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24<sup>th</sup> November 2022

*REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area originally covered 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).*