

25 August 2022

#### **Department of Planning and Environment**



Parramatta NSW 2150

Dear Department of Planning and Environment,

I write to request an extension of four weeks on the exhibition for public comment on Transport for NSW's rezoning proposal for the Paint Shop sub-precinct in Redfern North Eveleigh, which is set to end on Thursday, 25 August 2022.

The set timeframe for the exhibition is thirty-one days, which has been too short for members of the public and relevant community organisations to assess the rezoning proposal. This is especially the case considering the volume of documentation listed on the NSW Planning Portal site for the proposal, there are twenty-seven technical documents listed, many of which are hundreds of pages long. In the Heritage area alone, there are three technical documents totalling nine hundred and nine pages on top of the two key documents totalling one hundred and forty pages. The volume of documentation is significant considering that the promised pre-exhibition consultation with the community and community organisation REDWatch did not go ahead.

The recent offering of an alternate proposal on the Paint Shop sub-precinct rezoning in Redfern North Eveleigh by the City of Sydney reaffirms this request to extend the exhibition period; members of the public and community groups need time to assess the City of Sydney's proposal, as does the relevant Government Departments. As a result, the exhibition for public comment on the Transport for NSW Paint Shop sub-precinct rezoning proposal should be extended by four weeks.

Sincerely,

Hon. Mark Buttigieg MLC, Australian Labor Party

Deputy Chair of the Standing Committee on Social Issues Review of the Heritage Act 1977

Opposition Whip in the Legislative Council Parliament of NSW



From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 11:57 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** [WARNING: FILE ENCRYPTED]Webform submission from: Paint Shop sub-precinct

rezoning proposal

**Attachments:** letter-regarding-the-paint-shop-sub-precinct-rezoning-proposal-25.08.22.pdf

Submitted on Thu, 25/08/2022 - 11:49

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Mark

#### Last name

**Buttigieg** 

#### I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

Sydney, 2000

#### Please provide your view on the project

I am just providing comments

#### Submission file

letter-regarding-the-paint-shop-sub-precinct-rezoning-proposal-25.08.22.pdf

#### **Submission**

Please see the submission attached.

#### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 11:04 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 23:04

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Tad

#### Last name

Boniecki

I would like my submission to remain confidential

Νo

# Info

#### **Email**

## Suburb/Town & Postcode

2025

#### Please provide your view on the project

I object to it

#### Submission

The proposed building is far too high.

#### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 4:07 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 16:07

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Fred

#### Last name

Straughen

#### I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

**NEWTOWN** 

#### Please provide your view on the project

I object to it

#### **Submission**

I stongly object to any deviation of the 2008 master plan for the redevolpment of Eveleigh workshops.

I will consider the outcome of NSW state government on this matter, when it comes to the next state election.

#### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 4:05 PM

To: DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 16:04

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

First name

Matthew

Last name

Gordon

I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

Darlington 2008

#### Please provide your view on the project

I object to it

#### **Submission**

This proposed rezoning and development will have a significant detrimental impact to the Redfern / Darlington area in multiple ways.

- 1. Traffic will increase significantly. As a long term resident of Wilson st I have seen the impact of carriage works on traffic over the years. Wilson st is often at breaking point with events at carriageworks. Especially since the new cycle way has been installed, the local roads simply would not cope with this level of retail and residential development bring many cars and trucks to small roads. This would undo much of the good work that had been done with the cycle way and make our roads more dangerous for children and cyclists.
- 2. Parking is already at a premium in the area due to carriageworks and the university. A development of this size will attract many fold more cars than are already in the area.
- 3. The heritage impact would be massive. The heritage precinct would be overcome by a soulless, generic for profit development like many other parts of Sydney. Significant buildings such as the beautiful chief mechanical engineer's building would be overshadowed by the proposed high rise buildings and lose their prominence. Transport for NSW should be proud of the heritage of the carriage works area and not undermine it with this kind of development.

Current zoning laws must be retained. They have helped preserve the heritage and character of the area. A zoning change opens the doors for developers who have shown they will put profits before heritage and community..

- 4. Introducing so much retail into a suburban area will destroy our community. Darlington is a small and unique tight-knit community with familys and older residents. The quiet nature of the area would be lost and streets like Wilson st would no longer be residential but essentially main streets.
- 5. This could be a wasted opportunity to create a truly great green space in the area. The current promised green space amounts to nothing but green washing to help justify the development. This is clearly a for profit development which will benefit only developers. An alternate plan could see a large parkland created using the entire area which would accentuate and highlight existing heritage and could be a focus for the community.
- 6. The proposed retail arcade does not fit within the character and residential nature of Wilson St. Having a busy retail arcade across the street from residential houses will increase noise levels and negatively impact the historic character of the street and the value of opposing properties.

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 3:55 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** cr-hy-william-chan\_letter-of-opposition-to-north-eveleigh-paint-shop-proposal.pdf

Submitted on Thu, 25/08/2022 - 15:48

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

#### First name

**HY William** 

#### Last name

Chan

I would like my submission to remain confidential

No

# Info

#### **Email**

Suburb/Town & Postcode Sydney 2000

#### Please provide your view on the project

I object to it

#### Submission file

cr-hy-william-chan letter-of-opposition-to-north-eveleigh-paint-shop-proposal.pdf

#### **Submission**

25 August 2022

The Honourable Anthony Roberts MP Minister for Planning and Minister for Homes 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

https://www.planningportal.nsw.gov.au/paintshop

Dear Minister

Letter of Opposition to Redfern North Eveleigh Paint Shop Sub-Precinct Proposal

I am writing to express my opposition to the Rezoning Proposal for Redfern North Eveleigh Paint Shop Sub-Precinct.

#### Heritage Issues

The Eveleigh Railway Workshops – Overarching Conservation Management Plan identifies the Paint shop as exceptional heritage significance due to its large contribution to the function, growth and development of the NSW railways in the 19th and 20th Century. Its significance is further enhanced as a rare remaining example of a relatively intact workshop that continues to be used over a century which is a testament to its construction and design brilliance.

Standard heritage practice states that places of exceptional and high significance should be conserved (including preservation, restoration, reconstruction in accordance with the Burra Charter), and if adaptation is necessary for the continued use of the item, minimise changes, do not remove or obscure significant fabric. Furthermore, any proposed changes should be reversible.

The structure and form of the Paint Shop was specifically designed to establish controlled conditions for the painting of carriages and wagons, such as skylights designed to offer plenty of diffused southern light and installed louvres at the sawtooth apexes for increased ventilation. The proposed built extensions of up to 63.6m building (approximately 4-storeys) anywhere above the Paint Shop impact its form, fabric and distinctive characteristics that diminish the heritage significance of the entire site. The heights of all other existing heritage listed buildings are proposed to be retained.

No heritage protection is provided to the Paint Shop Extension based on the Redfern Waterloo Authority (RWA) controls. The current planning proposal is to adopt the RWA heritage buildings map, and part of the Extension will be demolished for a new building fronting Wilsons Street.

While not constructed to the same architectural standard and level of fine detail as the original Paint Shop, the Paint Shop Extension was integral to the continued operation of the Eveleigh Railway site into the 20th Century. The Paint Shop Extension is important in what it represents and demonstrates about the expansion and development of the Eveleigh Railway Yards into the 20th Century, and in the evolution of the form and technology of rolling stock as a whole, with the building intentionally built to accommodate newer wider bodied cars that the original Paint Shop was constructed to house.

Innovation Precinct: Increased GFA, Building Height

The increased residential and overall GFA exceeds the floorspace in the 2008 concept approval by 62-67%, which not only undermines the innovation precinct, but will impact the views, heritage and public domain through excessive bulk.

The proposed inclusion of 18-28 storey, high grade commercial towers will not deliver the affordable employment space previously identified as needed in the 'innovation precinct'. The success of the Precinct is through the delivery of 250,000 square metres dedicated floorspace, including 50,000 square metres of net lettable affordable space, wet and dry labs and shared maker-space for startups, scaleups, innovation ecosystem partners and other early stage companies. The lack of diverse spaces will result in an oversupply of the type of commercial space which already exists with a high level of vacancy in the CBD. In addition, the building heights in the proposal do not reflect the local character and heritage of the site.

#### Land Use

The proposed rezoning to B4-Mixed Use for commercial, residential and community uses does not protect other uses identified in the proposal. The open space in the proposal is not zoned RE1-Public Recreation, leaving open the possibility that it may be used for other purposes in the future..

#### Affordable Housing

The proposal does not meet the City's existing target for a minimum of 25% affordable rental housing, which should apply in addition to any commitment to 'diverse housing'. Instead, the proposal has a minimum 15% affordable housing.

#### **Aboriginal Housing**

There is no dedicated Aboriginal housing which is inconsistent with the objectives of applying Connecting with Country principles to the Precinct. There needs to be a commitment in the proposal to provide Aboriginal Housing, rather than it being "realised through tenancy management, post-renewal of the Paint Shop Sub-Precinct" (p.84), as it provides no certainty that this will be facilitated in future individual development proposals.

#### Bridge Connecting North and South Eveleigh

The proposal provides no commitment to a pedestrian/cycle bridge connecting the Paint Shop Sub-Precinct to South Eveleigh and the communities of Darlington and Chippendale with similar communities in Erskineville, Redfern, Waterloo and Alexandria. Priority 1.4 of the Tech Central Place Based Transport Strategy recognises the need for a crossing to better connect the Royal Prince Alfred Precinct and University of Sydney to Eveleigh, Redfern and Waterloo.

#### Extension of Public Exhibition

I also request for a minimum 4-week general extension for public exhibition and submissions, including workshops, consultations and information events so that the community needs and visions can be incorporated

Given the reasons outlined in this letter, I oppose the Redfern North Eveleigh Paint Shop Sub-Precinct Proposal and it should be rejected.

Yours sincerely

Councillor HY William Chan RAIA City of Sydney

BDesArch(Hons) MSc(ArchSustDes) DottMagArch CertASA DipASP NSW Registered Architect 11229

I agree to the above statement Yes



Councillor HY William Chan Sydney Town Hall 483 George Street Sydney NSW 2000



25 August 2022

The Honourable Anthony Roberts MP
Minister for Planning and Minister for Homes
4 Parramatta Square, 12 Darcy Street,
Parramatta NSW 2150

https://www.planningportal.nsw.gov.au/paintshop

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The City of Sydney acknowledges the Gadigal of the Eora Nation as the Traditional Custodians of our local area.

#### Innovation Precinct: Increased GFA, Building Height

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Yours sincerely

Councillor HY William Chan RAIA City of Sydney

BDesArch(Hons) MSc(ArchSustDes) DottMagArch CertASA DipASP NSW Registered Architect 11229

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 3:51 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 15:50

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am submitting on behalf of my organisation

# **Name**

#### First name

Emma

#### Last name

Jones

#### I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

Darlington

#### Please provide your view on the project

I am just providing comments

#### Submission

This submission is on behalf of the University of Sydney

#### I agree to the above statement



### Professor Mark Scott AO

Vice-Chancellor and President

25 August 2022

Rob Sharp Michael Cassel Secretary Secretary

Transport for NSW Department of Planning and Environment

Submission via <a href="https://www.planningportal.nsw.gov.au/paintshop">https://www.planningportal.nsw.gov.au/paintshop</a>

Dear Secretaries,

#### Redfern North Eveleigh Paint Shop Sub-Precinct Rezoning Proposal

The University of Sydney (the University) appreciates the opportunity to comment on the Transport for NSW (TfNSW) rezoning proposal for the North Eveleigh Paint Shop subprecinct.

The University sees the North Eveleigh Precinct as a key element in the transformation of the city through the successful creation of the Tech Central Precinct and an opportunity to create "a residential, entertainment and technology hub on the doorstep of the Sydney CBD".1

However, we are extremely concerned that the rezoning proposal does not fully appreciate the broader strategic context of the entire Tech Central concept, and that in its current form it will fail to optimise the social, cultural, economic and environmental outcomes at local, precinct and state levels.

Should the rezoning proposal go ahead as described without collaborative curation of the uses, and the focus of the industries that will ultimately tenant the facility, it is likely that the entire Tech Central concept and outcome will be compromised, negatively impacting the jobs, amenity, economic growth and state development opportunity that the broader NSW Government is working to deliver.

The University **requests that the public consultation period be extended** to allow for TfNSW to fully engage with and respond to the submissions and conversations the University has had with the NSW Government regarding the North Eveleigh Precinct.

As a member of the Tech Central Alliance, we have worked hard for four years to support the NSW Government's objectives for the Tech Central precinct. A separate submission is being made by the Alliance, which is in line with this submission and supported by the University.

Members of the Tech Central Alliance are:

- The University of Sydney
- University of Technology Sydney (UTS)
- City of Sydney
- Inner West Council
- Sydney Local Health District

<sup>&</sup>lt;sup>1</sup> Rob Stokes media release - Redfern on track for renewal - 26 July 2022



NSW 2006 Australia

We believe it is critical that these Tech Central institutional anchors have the opportunity to ensure that the development response to this proposal can deliver a vibrant third node for Tech Central that cumulatively catalyses off the Digital Tech node at Central and the Bio-Hub node at Camperdown.

Our attached submission below, which includes an additional three documents – one of which (Appendix D) is a **narrative prepared by the Tech Central Alliance on our vision for the North Eveleigh Precinct** – sets out the University's case that the rezoning proposal would substantially compromise the vision for Tech Central and broader NSW Government outcomes.

Should you have any queries about this submission, please do not hesitate to contact me by email at or Greg Robinson, Chief University Infrastructure Officer ( South So

Yours sincerely,

Professor Mark Scott AO Vice-Chancellor and President

#### **Appendices**

- A. The University of Sydney submission on the rezoning proposal for the Paint Shop subprecinct in Redfern North Eveleigh, 25 August 2022
- B. Redfern to Eveleigh Market Sounding University of Sydney submission to Transport for NSW & UrbanGrowth NSW, 2017
- C. Chief Medical Engineer's (CME) Building Expression of Interest, July 2022
- D. The opportunities for the North Eveleigh node in the Tech Central Precinct, 14 July 2022



# Redfern North Eveleigh Paint Shop Sub-Precinct Rezoning Proposal

## **Appendices**

Appendix	Document	Date	Pages, PDF
A.	The University of Sydney submission on the rezoning proposal for the Paint Shop subprecinct in Redfern North Eveleigh	25 August 2022	4-5
В.	Redfern to Eveleigh Market Sounding – University of Sydney submission to Transport for NSW & UrbanGrowth NSW	2017	6-42
C.	Chief Medical Engineer's (CME) Building - Expression of Interest	July 2022	43-46
D.	The opportunities for the North Eveleigh node in the Tech Central Precinct	14 July 2022	48-55

# Appendix A





The University of Sydney submission on the rezoning proposal for the Paint Shop Sub-Precinct in Redfern North Eveleigh, August 2022

#### Context

The University of Sydney, along with the Tech Central institutional anchors, has a strong history and committed roots in the Eveleigh community.

Over the past 10 years, the University invested \$1.5bn into developing world- leading multi-disciplinary facilities to solve emerging global problems. Such infrastructure includes the Sydney Nanoscience Hub, the Charles Perkins Centre, the Sydney Manufacturing Hub and other research assets which add to the investment identified by the NSW Government in the Tech Central geography. On the 19<sup>th</sup> of August 2022, the University Senate approved an investment of \$500 million in the Sydney Biomedical Accelerator (SBA) – a globally unparalleled research asset, in collaboration with the NSW Government. The SBA will attract the best researchers in the world and establish new start-ups requiring facilities in adjacent nodes such as North Eveleigh to enable their growth.

We provide ready-made foundations for Tech Central to leverage, and the University is determined to offer the strength of our built and intellectual assets to make Tech Central the best it can be. With our Alliance colleagues, we have represented for some time that a gap exists in the capability required to reach ultimate success in the potential of Tech Central. That success can only be realised if the North Eveleigh site is enabled to take on the heavy lifting to support industry and research collaboration in creative tech, and deeptech specialisations such as artificial intelligence, robotics and aerospace.

#### The University of Sydney View

Submissions have been made to the NSW Government by the University of Sydney on

- Redfern to Eveleigh Market Sounding University of Sydney Submission 2017 (Appendix B)
- Chief Medical Engineer's (CME) Building Expression of Interest 2022 (Appendix C)

**Appendix D** has also been shared with TAHE and TfNSW, and provides a draft Narrative prepared by the Alliance on the vision for North Eveleigh. This document recognises the importance of North Eveleigh to the entire Tech Central concept, and its contribution to the NSW Government's Tech Central strategy and broader NSW strategic objectives.

#### Catalysing Creative Tech Space

The landscape and existing structures of North Eveleigh present unique ingredients to catalyse the creative tech potential of Tech Central. North Eveleigh consists of large subterranean floorplates that, although unsuitable for residential or office space, hold unique opportunities to house research and innovation-rich activities such as manufacturing, cleanrooms and makerspace. The Paint Shop itself presents the opportunity to house activities undertaken by the University's Architecture & Design School, the leading design faculty in Australia. The collaboration opportunities that would come with co-locating the University's design talent and creative tech industry partners is a vital missing ingredient in the strategy to achieve Tech Central's innovation success.

The imperative to create more creative tech space has been validated by the NSW Government's own establishment of the Tech Central concept. The University agrees with this and believes it is crucial to set aside at least 250,000 square metres of such space as soon as possible. We further advocate that an additional 40,000 square metres of space be made available to catalyse and retain the industry and research ecosystem.

The University is prepared to acquire or lease on a commercial basis, buildings such as the CME building to meet this need.

Further, we have been in discussions with Investment NSW, contributing information and ideas about potential industry partnerships in creative tech. Indeed, the University is in well-developed discussions with high profile industry players keen to explore these types of arrangements with us, and in ways that complement the Tech Central objectives.

The current Paint Shop rezoning proposal places these opportunities in jeopardy and risks sterilising the opportunity to optimise Tech Central for decades.

The University was disappointed to learn recently that despite this long standing, intensive, collaborative and positive engagement, TAHE and other NSW Government agencies had formed, or been given to a misconception, that the University had not indicated strategic interest in the North Eveleigh precinct. To avoid misconception, the University of Sydney and the Alliance see North Eveleigh as absolutely vital to be curated to deliver the potential of Tech Central with an additive role supporting Central and Camperdown.

The University has briefed and engaged with Government over many years about the opportunities it sees to solve a number of challenges for the public good, and to supercharge the social, environmental and economic outcomes of the combined Tech Central nodes. It has briefed:

- Transport for NSW
- Investment NSW
- Greater Sydney Commission / Greater Cities Commission
- The Transport Minister Andrew Constance and Transport officials including the former Secretary Rodd Staples via Chief of Staff Stuart Wallace in February 2020; the then Chief Development Officer Mr Alex Wendler in July 2020; and Clare Sowden, the then Project Director for the Redfern North Eveleigh Precinct throughout 2021
- Michael Wheatley, Executive Director Urban Renewal at TfNSW; Toni Blume, Executive Director Regional Development at TfNSW; Huw Morgan, Senior Development Manager at TAHE; Alison McDonagh, Executive General Manager - Commercial & Property, TAHE; and Bruce Morgan, Chair of TAHE in 2022

The University has appreciated recent engagement with TAHE and TfNSW and notes TAHE's positive interest in the Alliance's activities.

This comprehensive suite of briefings and proposals should <u>not</u> be considered to satisfy any obligation by the NSW Government to consult with the University, as there has been no formal response or feedback to the University on any of these proposals.

The announcement by the NSW Government on 26 July 2022 of the intended rezoning of the Paint Shop precinct at North Eveleigh appears to signal an end to what has become more recently, through the leadership and advocacy of the Tech Central Alliance, a positive pathway to deliver a world-leading innovation district in Tech Central. It would be a lost opportunity if adequate time was not made available to properly consult, discuss, and engage with the Tech Central Alliance on the Paint Shop Sub-Precinct Rezoning Proposal.

Research from the Global Institution of Innovation Districts (GIID) indicates that emerging innovation districts need active involvement from strong anchor institutions to solve for the challenges that come with the unique economic functions, land uses and ownership of innovation districts.<sup>1</sup>

We look forward to TfNSW's positive consideration of this submission, an extension of time, and the conduct of meaningful engagement.

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<sup>&</sup>lt;sup>1</sup> https://www.giid.org/the-evolution-of-innovation-districts/

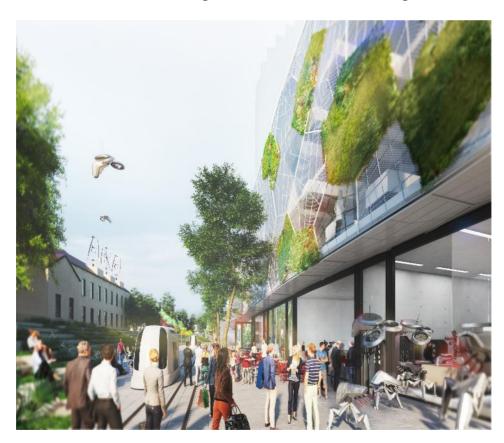


# **NORTH EVELEIGH PRECINCT**

# PART OF SYDNEY'S CLUSTERS

Response to Transport for NSW & UrbanGrowth NSW

Redfern to Eveleigh Market Sounding



# **Executive Summary**

While Australia has a strong history of invention and pioneering major technology and health breakthroughs, it is falling far behind the rest of the developed world in global competitiveness and the collaboration required to commercialise its ideas.

In the wake of the mining boom, this failure needs to be urgently addressed if Australia is to compete against other nations and attract the talent and capital required to reposition itself as a dynamic innovation-based economy.

Across Sydney, the Greater Sydney Commission (GSC) has acknowledged that a key element in improving Sydney's competitiveness will be supporting the evolution of Sydney's current health and education precincts into true innovation districts.

Globally, these districts if equipped with the necessary success factors and curated successfully have been shown to accelerate economic growth, improve productivity by creating new ideas, exports and long term sustainable jobs.

When developed as part of a connected network, innovation districts naturally begin to specialise; sharing ideas and talent so that the sum becomes significantly greater than the parts, multiplying the already considerable agglomeration benefits.

Within Sydney's Central Innovation Corridor at the geographical and research nexus of Sydney's evolving innovation network, the University of Sydney (the University), is a key anchor of the Camperdown-Ultimo Collaboration Area, Sydney's most mature innovation area.

This significant cluster of industry, academia, health, start up and creative businesses has been recognised as containing only one of two health and education precincts in Sydney which have the potential to rapidly become an innovation district if transport and land constraints can be overcome. As such it is a top 'Priority Area' focus for the GSC and integral to its ambition for a well-connected '30 minute Smart City'.



Figure 1: Sydney's Cluster of Clusters

We believe that an innovation precinct at North Eveleigh (East) can unlock these constraints and recommend that the land is developed and curated as an international standard, Bio-Medical and Engineering Innovation Precinct designed to address society's great challenges and modelled on known exemplars such as Brainport in Eindhoven.

Including discounted incubator and fabrication facilities, research labs, industry partner commercial space, student and research housing, open spaces and community infrastructure this mixed-use development would be an open collaboration of NSW Universities, Medical Institutions and industry, anchored around a commitment to known success factors such as integrated place making, intelligent design, sharing of ideas, incubation, and the commercialisation of research.

We believe with the right transport connections, this precinct and the wider Collaboration area could play a pivotal role in providing a nexus and foundation support to Sydney's other emerging innovation clusters, improving the innovation potential of all, including the special link that the University has with Westmead.

Economic analysis indicates such a precinct, if established correctly would achieve substantial long term economic benefits including:



<sup>\*</sup> Range reflects the low and high scenarios for wider productivity uplifts across the broader catchment, i.e. 1% versus 10%.

For North Eveleigh (West) the University would like to see that land remain residential, as is currently envisaged by UrbanGrowth NSW, but with a greater focus on Universal multi aged affordable accommodation to alleviate local pressures on aged, key worker and student housing. We are also aware that Schools Infrastructure NSW are seeking locations for a vertical school and would welcome this contribution to the area.

As the Collaboration Area's largest anchor and a world class research Institution with a 160 year history in the area, the University is taking a leadership role in working with the GSC to promote engagement between key stakeholders and to contribute heavily to its success.

In recent years the University's strategic direction has been realigned to focus on a significant increase in collaboration with industry partners so that the way we teach and how we think will increasingly be done in collaboration with industry. However, to attract industry we have identified that as early as 2030 we will need more land to create the facilities required for a research and teaching environment that can compete on the world stage.

**The North Eveleigh Precinct** can be a lighthouse project for all these aspirations. But it needs a rethink around transport, land use planning, funding and investment, to succeed.

The University agrees with the GSC that this expansion needs to be supported by efficient transport connections. Capital from the divestment of the Redfern and North Eveleigh land parcels needs to be ring fenced and priority given to the full redevelopment of Redfern station to ensure it is DDA compliant and capacity is increased. We are conscious though of the physical limitations of Redfern and that capacity increases are unlikely to be able to support the precinct's future growth and the University will continue to advocate for a fully integrated transport solution including a Sydney Metro West station at the University as the only long term viable transport option.

The University and GSC understand that Innovation Precincts require scale to allow them to succeed and the University would propose to blend North Eveleigh (East) with our own Knowledge Hub development so a critical mass can be achieved without overdeveloping the

land parcels in what is a predominantly low rise residential area. This approach would ensure the overall precinct is both optimised and sympathetic to the community.

While such precincts cannot simply be proscribed by government, it is widely acknowledged that their development and connection can be enabled by an understanding of the ingredients of success, analysis of gaps in skills and infrastructure, and the development of public policy that provides targeted and cost effective planning, land use and transport support.

We acknowledge that we cannot do this alone and along with our Collaboration Area partners would seek to work collaboratively with Transport for NSW (TfNSW) and UrbanGrowth NSW to unlock the potential of the Precinct and add significant long term value to Sydney.

Led by the University, a number of funding and delivery options are available which would reduce risk by leveraging the University's existing asset base, the future Knowledge Hub development and its significant local experience in successfully delivering nearly **\$2bn** of mixed use world class complex developments.

As a not for profit, long term local landowner with a triple A rating, our desired outcomes are for the greater good, not short term development margins. We succeed simply by attracting more students and researchers and as such are willing to work with TfNSW and UrbanGrowth NSW to ensure that development margins across both the Knowledge Hub and North Eveleigh (East) are shared.

As landowners embedded within the local community for over 160 years, the University is acutely aware that the area surrounding North Eveleigh is experiencing significant community resource constraints and the provision of further residential apartments without a significant increase in infrastructure would simply over burden existing transport, road, child care, health and education resources while adding little back to the community.

Our proposition and suggested development mix thus aims to reflect not just the necessary elements to create a successful innovation precinct but be designed to enhance not impact the local community within which the Precinct would operate.

The University recognises that if the site was developed based on a 'highest and best use' real estate market approach, the site would be predominantly multi-unit residential. However, the University believes its North Eveleigh proposition directly aligns with current Federal and State ambitions and would generate, not just a substantial market land value but if structured correctly, an ongoing annual payment to TfNSW.

More importantly he University's suggested approach will deliver sustainable long term economic benefits not achievable through a residential focused divestment.

The University believes that the North Eveleigh land parcels provide a unique opportunity for Transport for New South Wales and UrbanGrowth NSW to support the local community and foster the long-term growth of the University while accelerating the development of the precinct to become Sydney's first true innovation district.

The University welcomes the opportunity to work with TfNSW, UrbanGrowth NSW, and the GSC to achieve these aspirations for the North Eveleigh Precinct.

# **Sydney's Cluster of Clusters**

#### **The Shifting Paradigm**

Over the past century, the most successful global regions have been those that recognised and take first mover advantage of paradigm-shifting technologies – from Victorian cotton mills, electronics in Tokyo to software in Silicon Valley, the ability to identify, innovate and evolve has influenced a city's ability to survive and compete over time.

Today, competition is rapidly intensifying as globalisation and technology eliminate borders, opening cities and their institutions to ever increasing competition.

Furthermore, within the next decade, a new set of technologies – the internet of things, automation, robotics, genomics, personalised medicines, artificial intelligence, additive manufacturing – will enter the mainstream impacting every product and service.

As in the past, the cities at the forefront of these technologies will benefit the most, attracting capital and talent and seeding the path for the creation of the new Tesla or Google.

The cities that succeed will be vibrant, interesting places, which attract talented diverse workers, entrepreneurs and intermediaries and boast great public transport connecting dynamic innovation precincts.

#### The Innovation Eco-System Precinct



Innovation Precincts are distinctive eco systems within a city which have high collaboration, ingenuity and economic growth potential. The Brookings Institute <sup>1</sup> first recognised the phenomenon of clustering industry, academia and government institutions as a precinct urban planning model based on the success of the organic evolution of Silicon Valley in the US and more recent intentional programs such as 22@in Barcelona and the Boston Seaport Innovation District.

These precincts demonstrate the capacity to bridge the gap between pure R&D and commercialisation of those concepts through collaboration between research institutions, government and industry.

Lessons from less successful innovation districts show that poor governance, a lack of scale, limited government support and the failure to attract talent can all drive whether a precinct achieves the critical mass necessary to realise its potential.

While governance and government support can be prescribed, the attraction of talent is dependent on a variety of factors such as education levels, access to affordable housing and

 $<sup>^{\</sup>mathrm{1}}$  Katz and Wagner, Brookings Institute : The Rise of Innovation Districts, May 2014

the desirability of the location. Striking a balance between commercial and residential is key to ensuring precincts are safe, active and open to all and although Sydney continues to be regarded as one of the world's most liveable cities its attraction is diminished by having the world's second most expensive housing market.

PWC highlighted<sup>2</sup> a number of features that make a precinct distinctly suited to innovation including **Industry**, **Anchors**, **Pathways**, **Network Connections** and **Liveability** with economy, geography and society forming a pyramid of dependency that needs the right balance to foster thriving entrepreneurial conditions.

These precincts cannot be created. They develop, often over generations, initially around academic institutions often working with government research investment which then attracts industry.

It is thus of critical importance that existing successful centres which have reached or have the potential to reach maturity are supported.

#### **Sydney Innovation Precincts**

Across Sydney, universities, health service providers, industry, entrepreneurs, investors and government are building strong 'clusters' or 'cities within a city' where collaboration between local industry and research are supercharging economic growth.

Currently, there are at least six recognised innovation precincts in Greater Sydney across a range of industries, and at various stages of maturity.

1. **Central Innovation Cluster - City / Ultimo / Darlington / Camperdown**: the "apex" with a diversity of industry, three major universities, 18 other education institutions, plus major hospitals and medical research institutes — this incorporates the Camperdown-Ultimo Collaboration Area within which sits the Central to Eveleigh Precinct.



Figure 2: Central Innovation Corridor including Camperdown-Ultimo and North Eveleigh

Source: 'Innovation Corridor' GSC Eastern District Central Plan, Oct 2017

2. **Greater Parramatta**: including the Westmead hospital networks and research institutes, two major universities, with growing industry and improving transport. The district has created a collaborative partnership, The Westmead Alliance, formed between major stakeholders

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 $<sup>^{2}\,</sup>$  PWC, Creating the Discovery Bridge – Connecting Innovation Districts, 2017

including the hospitals, medical research institutes and the University of Sydney as a major driver of innovation in the district.

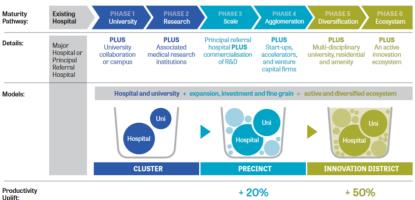
- 3. **Macquarie Park**: well established, home to a major University and private hospital as well as major tech companies and with a focus on developing start-ups. Key anchor institutions and corporates have branded together under the Macquarie Park Innovation District moniker.
- 4. **Liverpool**: a health and education precinct with three major universities, hospitals and a research institute with a strong manufacturing industry sector. All the major institutions and government agencies in the area have formed a collaborative partnership to promote Liverpool as a health and education campus town.
- 5. **Kensington**: home to a major university, with engineering strength, major hospitals and an established international partnership to drive innovation.
- 6. **Western Innovation Corridor**: innovation arc of the west from the Sydney Science Park down to Campbell town supported by future development of the Western Sydney Airport around which the University has significant land holdings.

Research conducted by the NSW Innovation & Productivity Council<sup>3</sup> and PWC<sup>4</sup> highlight that of all of the precincts, the Central Innovation Cluster is the largest employer, has the most anchors, greatest number of pathways, best network and the highest liveability scores. It's only failing is the need for better Governance and Branding, an issue that the University, in conjunction with the GSC, is taking a leading role in resolving through connecting key anchor institutions as part of the Camperdown-Ultimo Collaboration Area.

Recognising Sydney's potential for innovation, the GSC in its Regional Plan (Objective 21) promotes the success of internationally competitive health, education, research and innovation precincts and in its Draft Eastern City District Plan (Priority 8) supports growing and investing in health and education precincts and the Innovation Corridor.

In line with IPC and PWC research, the GSC recognises that innovation districts follow a path to maturity. As precincts evolve, the economic productivity of the precinct increases substantially, with the GSC recognizing three general models, which become progressively more complex: Clusters, Precincts and Innovation Districts. Collaboration Areas are enablers of precincts in this context.

Figure 3: GSC Maturity Pathway



Source: GSC Draft Region and Eastern District Plans.

In applying this model to Sydney, the GSC notes that only the Camperdown-Ultimo and Randwick Health and Education Precincts, have the potential to become Innovation Districts and

<sup>&</sup>lt;sup>3</sup> Innovation and Productivity Council, Project 3: Innovation Precincts in NSW, 2017

therefore need a tailored response to land use and infrastructure planning to allow them to progress along the maturity pathway and reach their potential.

The Plan recommends that employment lands be sterilised from residential conversion and conditions created for the continued co-location of health and education facilities and that services to support the precincts growth, have high levels of accessibility, attract business and facilitate housing opportunities for students and workers within 30 minutes of the precinct.

This approach clearly aligns with global precedents for the re-use of state assets to assist the formation of such precincts such as Kings Cross and Central St Martins in London which demonstrate the important role that government and academia can play in developing successful creative innovation spaces within cities.

The University agrees that the Camperdown-Ultimo Health and Education Precinct is in Phase 4 and has the potential to quickly enter Phase 5 provided the necessary government support, as advocated by the GSC is provided.

#### The Need for Improved Collaboration — Creating a Cluster of Clusters

While a singular integrated innovation precinct can certainly boost innovation, the successful precincts also have established deep connections with other clusters / precincts / districts which enhance their collective innovation capacity so that the sum is greater than the parts.



These connections are both physical in the form of efficient transport connections and relationship based as precincts partner on research, specialise where appropriate, swap talent and come together to tackle major technological and societal challenges.

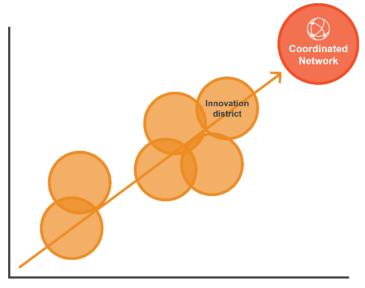
The British Government note that while the marginal cost of transmitting **information** across geographical space has fallen significantly, the marginal cost of transmitting **knowledge** continues to rise with distance. Therefore, the knowledge spill over benefits of clustering and efficient transport can be particularly large for high value knowledge intensive sectors.<sup>5</sup>

Interconnected precincts have fewer impediments to the exchange of knowledge crucial to their success. Physical proximity allows for researchers, universities, high-growth firms and start-ups to collaborate and cross-pollinate. This drives the development of stronger networks and bonds between the precincts. The strengthening of the network of entrepreneurs, jobs, capital and innovation stimulates new and higher levels of connectivity, idea sharing and performance.

<sup>&</sup>lt;sup>5</sup> Devolving Decision Making: The Importance of Cities to Regional Growth, Volume 3, Great Britain Treasury

Figure 4: A Coordinated Network and the Impact on Performance

Innovation Potential/ Investment Attraction



Innovation Performance

Ongoing organisational collaboration and cross-pollination, through dedicated networking events, hackathons and meetups, enable the effective management and transfer of intangible, knowledge-based assets. Frequent face-to-face interactions, facilitated by proximity, is effective at strengthening trust between participants of innovation and allows information that is difficult to articulate, or tacit knowledge, to be shared between parties.

Sydney can become a cluster of clusters.

Close proximity of precincts reduces the amount of energy and resources firms and researchers expend seeking out expertise and potential relationships. This allows for knowledge and competencies matching to be achieved at a reduced cost, which is particularly important for start-ups that have little resources and knowledge of potential partners. Research has also found that innovative firms that collaborate with partners located within a close regional proximity also experience fewer difficulties in their innovative partnerships.<sup>6</sup>

To understand proximity within Sydney and in line with the GSC's 30 min Smart City we commissioned Aurecon<sup>7</sup> to analyse the travel times between innovation precincts including the impact of approved infrastructure projects. This revealed that currently of 66 connections between known innovation precincts only 12 or 18% have travel times of 30 minutes or less.

In the case of the Camperdown Precinct, most travel times to precincts other than those adjacent to them are impacted by the long walk to Redfern Station. The RPA is a 26 minute walk to Redfern Station and 14 mins from the centre of the University before getting on public transport. By comparison, most other connected precincts have a less than 5 minute walking time to the most efficient mode of transport

Despite significant NSW investment in infrastructure including:

- a. Stage 1: Sydney Metro Northwest line development
- b. Stage 2: Sydney Metro City and Southwest line development
- c. Stage 3: Sydney Metro West (Parramatta to CBD) via White Bay Power Station
- d. Sydney Light Rail (Randwick)

<sup>&</sup>lt;sup>6</sup> Bruijn, OECD, The Spatial Industrial Organisation of Innovation, June 2010

<sup>&</sup>lt;sup>7</sup> Aurecon, Greater Sydney Innovation Precincts, Oct 2017

- e. Parramatta Light Rail
- f. WestConnex (M4 and M5)
- g. M4 upgrade

There is no predicted increase in the number of connections less than 30 minutes i.e. this suite of infrastructure does not appear to contribute to the connected city, although it does reduce travel times of 25 of the remaining 30min+ connections.

The analysis shows that despite its economic significance and the importance of connecting known innovation districts, the Camperdown-Ultimo Collaboration Area has received very little benefit from the new investment in infrastructure.

However, if a Sydney Metro West station was provided at the University's Camperdown campus, 18 connections would have a travel time of less than 30 mins with a reduction in travel time for 30 of the remaining 30min + connections and a substantial amount of network capacity would be added back into the rail system.

If Sydney is to take advantage of its health and education precincts and their potential to transform into innovation districts, TfNSW leadership in facilitating and initiating those connections which support their proximity is urgently required.

# The Hub of Sydney's Cluster of Clusters

## The Camperdown-Ultimo Collaboration Area

In its Draft Eastern City District Plan, the Greater Sydney Commission (GSC) identified the precinct surrounding the University of Sydney as the Camperdown-Ultimo Collaboration Area' and the "Camperdown-Ultimo Health and Education Precinct", while Jobs for NSW identifies that the area lies within the "Sydney Central Innovation Cluster", and sees the cluster playing a major role in delivering **one million new jobs** across Sydney by 2036.

Figure 5: The Cluster of Clusters

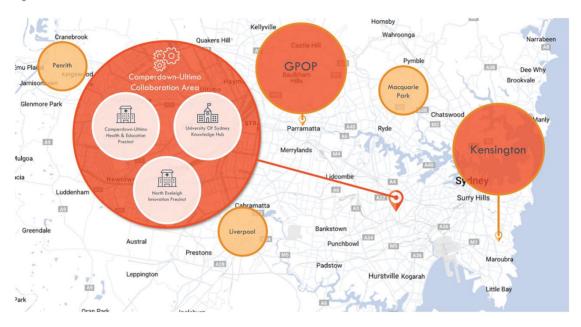


Figure 6: The University and surrounding precinct



The presence of three universities including the University of Sydney, Sydney's largest and most advanced teaching hospital, the Royal Prince Alfred, TAFE Ultimo, leading medical and technology research institutes, the Australian Technology Park, Carriageworks, industry players, incubators, accelerators and government, reflect nearly all of the identified success factors needed for a world class health and technology innovation precinct and positions the Collaboration area as the most "innovation ready" location in Sydney to be transformed into an Innovation District.

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Figure 7: GSC's Camperdown-Ultimo Collaboration Area

The GSC in its Eastern City District Plan seeks to leverage these attributes to create an innovation district of 'international standard' noting the precinct is already having a multiplier effect on innovation and creative industries but has numerous challenges which are preventing its growth including;

Collaboration Area

- A lack of affordable space
- Loss of employment floor space
- Lack of opportunity to create new commercial floor space
- Need for suitably zoned employment land
- Rising property and accommodation costs for key works and students.
- Transport links

IIIII Future Metro Station

#### **Taking Leadership**

Despite the clear advantages of increased collaboration, at present, Sydney's innovation precincts have no clear targeted focus that differentiates one from another or differentiates Sydney, out of all Australian cities, as the place to invest. Collaboration is negligible as competing interests strive to survive.

This does not need to be the case – the evidence indicates that key anchor institutions and their specialisations as well as the presence of major companies and specific industries can, over time, give rise to a logical focus or - smart specialisation - for each precinct. However, to date this has not been well articulated or coordinated across Sydney.

The University and its Collaboration Area partners agree with the GSC that the Collaboration Area with its combination of major research anchors with established networks and existing pathways to commercialisation can quickly become Sydney's first innovation district. Moreover, we believe that with additional land and improved transport connections our geographically central location and innovation maturity can be leveraged to support Sydney's innovation precincts and enable the GSC's vision of a 30 min smart city.

We believe North Eveleigh will jump start us in achieving the scale required to create Sydney's first world class innovation precinct and an enabler of cluster collaboration and specialisation.

Over the next 20 years and beyond we see the Innovation District with the Sydney CBD as the primary driver of national investment and job creation, in a relationship in which the Greater Parramatta to Olympic Peninsula (GPOP) is the emerging counterpart accelerator of population and investment growth.

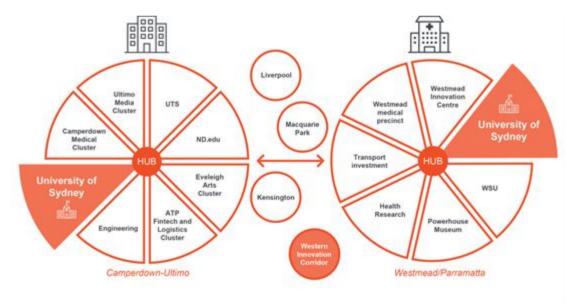


Figure 8: The University of Sydney has a leadership role across multiple innovation precincts and districts

#### Constraints to developing the North Eveleigh Precinct

The Camperdown-Ultimo Collaboration Area is a victim of its own success in that the majority of stakeholders are experiencing a combination of space and transport constraints.

UTS has identified the Powerhouse Museum site for future expansion, while the Royal Prince Alfred Hospital (RPA) which currently treats more public patients than any other hospital in NSW is site constrained and is forecasting demand for its services to significantly increase as the

surrounding catchment population ages. To accommodate this, the hospital needs to increase beds by 40% by 2030 while expanding its research capabilities to improve efficiency and care.

While UTS benefits from the proximity of Central Station, The University of Sydney and the RPA are predominantly supported by Redfern station which currently has a single lift, overcrowded platforms and currently operates at well over maximum capacity for 80% of the trains arriving during peak times – refer figure 9 below.

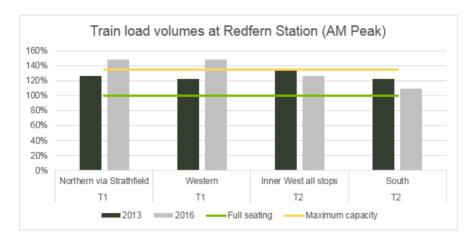


Figure 9: Peak train loads measured at Redfern (2014/2016)

With significant growth driven by RPA, University of Sydney, Carriageworks, Australian Technology Park, Commonwealth Bank and the redevelopment of Redfern/North Eveleigh our research indicates that the surrounding pathways will reach design capacity as early as **2020**, the station exits at in **2021** and the stairs in **2028** – refer figure 10.

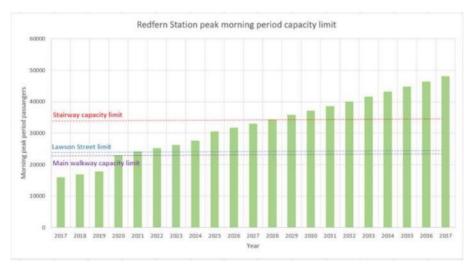


Figure 10: Redfern Station peak morning period capacity limit

While the University is supportive of a major redevelopment of Redfern station it remains concerned at the limited options on such a constrained site to expand capacity and will continue to advocate for both a new pedestrian / Automated Electric Vehicle (AEV) bridge linking Waterloo to North Eveleigh (suggested as part of our proposition) and above all a **Metro West** station within our Camperdown campus as the only viable solution to support long term growth for the University, Camperdown-Ultimo Health and Education precinct and the proposed innovation district.

 $<sup>^8</sup>$  Sydney Local Health District, University of Sydney : Building Better Health In the Growing Inner West, Feb 2017

In support of this position, the Greater Sydney Commission has stated that realising the potential of the Collaboration Area and its role as a nexus for innovation across Sydney requires specific support from industry, academia and particularly government including:

- Creating a global brand and identity
- Protecting and supporting the growth of core health & education activity within the precinct.
- Providing new research facilities
- Delivering innovative health and medical related commercial premises.
- Planning for complementary uses that support the Hospital and Universities
- Increasing cultural, creative, digital or technology businesses and employees.
- Capitalising on the unique elements of existing assets
- Establishing, enhancing and promoting the interdependence between health and education and the growth of innovation, start up and creative industries.
- Improving transport, walking and cycling connections between key hubs, particularly in response to student and job growth.
- Upgrading the public domain through new place making initiatives
- Supporting a range of housing types and price points for key works and students.

#### Universities as Anchors and Enablers

Economists estimate that the existing stock of knowledge generated by university research was worth almost \$160 billion in 2014, equivalent to approximately 10% of Australian GDP. This 'knowledge stock' value exceeds the entire value-add to GDP of Australia's mining industry'.

Universities aligned with hospitals and medical research institutes are recognised as drivers of economic activity globally, as evidenced by precincts such as the Discovery District, Toronto, Cambridge Biomedical Campus, Karolinska Institute, Stockholm and Texas Medical Centre, Houston.

The Brookings Institute in its recent October 2017 study <sup>10</sup> has reinforced the economic importance of universities located near major employment neighbourhoods in large cities. They found that research universities are essential for innovation and economic growth, with an overall multiplier effect of 1.9. The study highlighted the fundamental importance of the economic contribution of US "downtown" universities in the innovation ecosystem.

Universities also play a broader positive role in providing significant community infrastructure and place-making, giving structure and vibrancy to Sydney's major centres, stimulating spill-over industries, cultural and sporting activities, and start-ups.

#### Ensuring the University of Sydney grows as an enabler

Within the Collaboration Area and wider Innovation Precinct, the University of Sydney's vision is unashamedly aspirational, aiming to position the University as the #1 research university in Australia and a leading institution globally, while taking a leadership role in firmly establishing and anchoring the Collaboration Area as the country's foremost innovation district.

Over more than a century and a half, the University has established a pre-eminent position in engineering, health and medical research, evidenced today by a strong performance in competitive grants, excellent research outcomes, substantial new capital investment and ongoing connections across a vast and diverse clinical and technical network.

<sup>&</sup>lt;sup>9</sup> Deloitte Access Economics, The Importance of Universities to Australia's Prosperity, Oct 2015

<sup>10</sup> Andes, Hidden in Plain Sight : The oversized impact of downtown Universities, Oct 2017

However, when compared to leading UK and US institutions we continue to fall behind in funding, scale and our relationship with industry.

To succeed on the world stage, the University has acknowledged it needs to grow while increasing its external focus to ensure it is attractive to talent and business, its research can be easily commercialised, and its students are equipped with the relevant skills for jobs which may not yet exist.

This will require an increase in physical infrastructure, research investment and an emphasis on developing our students to think analytically, problem solve and lead through the blending of learning and industry exposure supported by a significant increase in industry partnerships and collaboration.

The University has already prepared the ground to achieve these goals with the following initiatives:

- The University of Sydney Strategic Plan 2016-2020 outlines the concept of the Knowledge Hub, whose physical centre lies within the University's founding geography, but whose spokes connect to a constellation of nodes, a distributed ecosystem of 'maker spaces', 'test and learn' spaces, retail and commercial space. Through the Knowledge Hub, multi-disciplinary initiatives in teaching, research, and project partnerships will be hosted.
- The Westmead Innovation Centre (WIC) is the centrepiece of the University's new generation of partnership with the redeveloped Westmead Hospital and precinct, meeting practical real-life challenges such as chronic disease and its complex social determinants and consequences. It will be a magnet for private sector medi-tech and knowledge economy investment in the Parramatta area. The University's Western Sydney Strategy was endorsed by Senate on 1 November 2017 with the intent to increase student numbers to 6000 by 2030 and commences with the \$85m CASB, IC and other Infrastructure Projects direct connections between Camperdown and Westmead is critical to facilitate this ongoing investment.
- Sydney Health Partners, a collaboration of the SLHD, WSLHD, Sydney Children's
  Hospital and the University of Sydney achieved NHMRC endorsement to establish an
  Advanced Health Research and Translation Centre (AHRTC). This is a major strategic
  asset connecting the Camperdown and Westmead Precincts in multilateral and
  multidisciplinary relationships.
- The University of Sydney's ground breaking multi-disciplinary research and teaching
  model is well established at the Centre for Translational Data Science, Charles
  Perkins Centre, Australian Institute for Nanoscale Science and Technology (AINST),
  Brain and Mind Centre, Marie Bashir Institute for Infectious Diseases and Biosecurity
  (MBI), and the Australian Centre for Field Robotics.

#### Space to Grow the Camperdown-Ultimo Health and Education Precinct

The University faces similar challenges to its Collaboration Area partners in delivering sufficient infrastructure to attract, recruit and retain its researchers, staff and students while developing sufficient commercial space to support its industry and collaborative partnerships.

The University alone has already invested nearly \$1.4 billion over the last 6 years through its Campus Improvement Plan (CIP 1), including the completion of recognised world class collaborative facilities in the Charles Perkins Centre, Abercrombie Business School, and the Sydney Nanoscience Hub. Under CIP 1, the University is already committed to investing an additional \$1.5 billion to 2020.

In addition, the University has commenced the acceleration of Campus Improvement Plan 2 (CIP 2) to support the **Knowledge Hub** and maintain the University's growth including an additional \$1.4 billion to 2030.

\$4.3 BN investment in Campus Improvement Plan by 2030



Unfortunately, as the original Australian sandstone University, the University has a significant amount of State and National Heritage buildings which restrict its ability to develop within its campus boundaries and once CIP 2 is exhausted, the University will then be unable to organically expand, suffering a **GFA Constraint Gap** which will curtail any further major development at the University and its anchor role in the area.

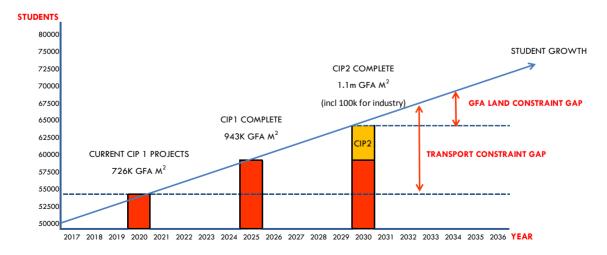
#### **Transport**

More urgently, the University is already suffering from a lack of investment in Redfern station, we also have no direct route to the new Waterloo Metro, congested roads, limited alternative transport options and by 2020/21 will be suffering an acute **Transport Constraint Gap**.

The issues with Redfern Station are already manifesting themselves with the recent cancellation of the Redfern stop of the Mountain BMT Train (Bathurst - Emu Plains travelling to Central) which upon analysis can only be due to the need to ease congestion, we do not believe the answer to Redfern is less trains which reduces our already limited transport options.

As we have identified throughout this document, land to expand and good transport connections are key enablers in allowing the precinct to develop, failure to provide these will constrain the University while discouraging the innovation and industry partnerships that have consistently been shown to rely on efficient public transport.

Figure 11: University of Sydney GFA and Transport Constraints by year of impact



Even a conservative estimate of future increases in student numbers would indicate that transport limitations could impact growth as early as 2020/21 while completion of the CIP2 / Knowledge Hub in 2030 would mean the University had no further opportunities to expand without the acquisition of further land.

As recognised by the GSC, only assistance by government in releasing land and improving transport connections can enable the University to enable the innovation district.

# **Our Vision for North Eveleigh**

We are pleased that the GSC recognises the need to support and invest in its health and education precincts, and agree that the University and the wider Camperdown-Ultimo Collaboration area have all of the recognised factors to develop the precinct into a world class innovation district subject to that support.

Exemplified by Kings Cross in London, we believe the land at North Eveleigh affords Transport for NSW (TfNSW) a precinct shaping opportunity to enable the University and wider Collaboration area to create a leading Bio Medical & Engineering Technology innovation precinct focused on addressing society's grand challenges and bridging the collaboration gap critical to Sydney and the State's success.

Once established we believe the critical mass of this Precinct combined with the University's Knowledge Hub will transform the current Health & Education Precinct into Sydney's first world class innovation district with demonstrable flow on effects across the city and state economy.

#### The Community

The North Eveleigh land parcels are embedded in predominantly low rise Victorian terrace residential estates with limited opportunities to improve road networks.

As the major local landowner with a 160 year history in the area, the University is acutely aware of the impact that overdevelopment of Redfern and the surrounding land will have on the immediate community.

Darlington has experienced high growth with a 13.3% increase in school enrolments between 2012-2016 with no new schools built in the same period. Similarly, research conducted by both the University and City of Sydney indicates a shortage of nearly 700 early learning spaces.<sup>11</sup>

Pressure on medical resources is also expected to increase significantly with the number of residents over 70 projected to rise by 29% by 2021 and 81% by 2031 with a high proportion being single at risk females.

To date the University as the major local landowner has supplemented community infrastructure through the provision of publicly accessible child care, libraries, museums and sports facilities, refer **Annexure A** - while our affordable student accommodation program has directly removing students from the local rental pool that would otherwise compete with other low income earners for the limited housing stock available.

However, all of the data indicates that the area has reached capacity and is unable to accommodate any further increase in resident numbers without significant investment in the supporting infrastructure.

Our proposition, outlined below, and the associated development mix thus aims to reflect not just the necessary elements to create a successful innovation precinct but be designed to enhance not impact the local community within which the Precinct would operate.

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<sup>11</sup> CRED University of Sydney Education and Care Demand Study, Oct 2014

#### The Vision

#### North Eveleigh (West)

The University would like to see that the land in North Eveleigh (West) remains residential, as currently envisaged by UrbanGrowth NSW but with a lower density and a focus on Universal multi aged affordable accommodation to alleviate local pressures on aged, key worker and student housing.

As the area's largest accommodation owner, the University has recently completed 1000 affordable student accommodation beds with a further 1000 either in construction or in SSDA and would welcome the opportunity to work with TfNSW and UrbanGrowth NSW in delivering more on this site.

Any residential development should be provided with the necessary community infrastructure to ensure that there is no net impact on existing services particularly education, medical and child care and again the University is open to extending its campus services to support TfNSW and UrbanGrowth NSW where appropriate.

We welcome the original UrbanGrowth NSW plans for a large park and advocate for this to remain and be of comparable quality to the University's wider campus open spaces.

We are also aware that Schools Infrastructure NSW are seeking locations for a vertical school and believe North Eveleigh (West) could accommodate this which would resolve a pressing local need.

#### North Eveleigh (East)

The GSC recognises that innovation districts require scale to attract talent and capital; North Eveleigh (East) alone does not have the critical mass to achieve this.

To maximise land value and ensure sufficient mass is developed, the University proposes to blend the land at North Eveleigh (East) with its own campus Knowledge hub to deliver a Biomedical & Engineering Technology innovation precinct totalling nearly **341,000** m<sup>2</sup> **GFA**.

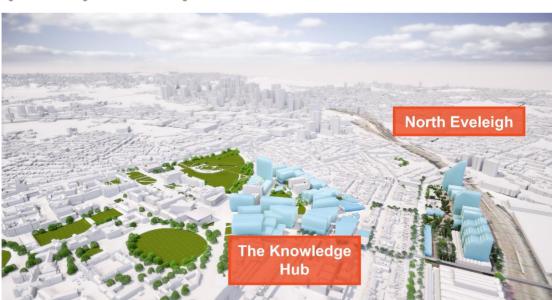


Figure 12: Knowledge Hub and North Eveleigh Precinct – A World Class Innovation Precinct

In achieving this, the University would seek to curate a development mix which maximises land use and leverages the University's capabilities and that of the wider Collaboration area, while establishing the known success factors from other successful innovation precincts.

To understand 'what is possible' on North Eveleigh (East), the University has engaged Cox Architecture to carry out a planning and massing study for an innovation precinct which integrates the University's Knowledge Hub, Redfern Station and the local community – refer **Annexure B.** 

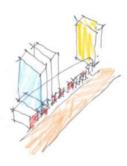
Development principles would include:

- sustainability
- activated ground floor plane
- adaptive reuse where possible
- retention of the precincts character and heritage
- accentuate gateways
- create major connections through to the University, RPA, Redfern and Waterloo
- increase the amount of public open green and urban spaces
- Increase the amount of community facilities so that the precinct adds not impacts.

#### **Site Analysis**

Massing studies on North Eveleigh (East) indicate that a GFA of approximately **166,000m**<sup>2</sup> is possible (subject to the Department of Planning and Environment consent) with a significant setback from Wilson St to allow for a major thoroughfare and the building mass to be substantially away from the finer grain of the victorian terraces.

While the site orientation has the advantage of any overshadowing falling on the rail tracks or Australian Technology Park we would not advocate for any building higher than those shown.

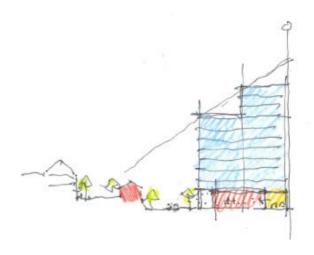


#### The North Eveleigh Precinct Placemaking

The success of the North Eveleigh Precinct innovation ecosystem will depend on a diverse 24-hour Precinct supported by magnetic places for social interaction and ideas exchange. These Precincts depend on a range of uses including Education, Incubator & Fabrication Space, and Commercial for Small, Medium, Gazelle and Anchor tenants / industry partnerships, retail and critically a resident population (which from international benchmarks should be no more than 30% of the GFA).

The encouragement of new technologies and innovation is allowed for with flexible spaces that provide stimulus and the ability to think freely unconstrained by conventional building typologies. Key new pedestrian links across Redfern station and a pedestrian / autonomous vehicle connection to the Australian Technology Park and Waterloo Station will reimagine these connections

The precinct design is anchored with egalitarian place making that encourages people to dwell and engage with what will be a vibrant and diverse community of people and events



#### We envisage the places for the magnetic interactions to include:



#### The community constellation

A cluster of low scale heritage and new buildings on the Wilson St interface to Darlington and the University create a series of decolonised spaces for a diverse range of community use including an early learning centre of excellence and an indigenous childhood diseases research facility in partnership with the RPA, recreational facilities and an extension of the University's cultural arts program.

#### A garden terrace of technology

Bridging the levels between Wilson St and the locomotive boulevard is a sculpted terrace garden creating a theatre to observe innovation. These seated edges provide places for large and small gatherings in a variety of setting. The terraces form theatrettes of varying scale for demonstrations.

#### The locomotive boulevard

Linking all the place in the precinct is the locomotive boulevard. The landscape interprets the heritage of the site though exposure of the existing train tracks. Rail transport and freight technology would be juxtaposed against autonomous vehicle and drone research in which the University is currently partnering with TfNSW.

#### The bio-robotic incubator

The podium of the North Eveleigh Precinct will exemplify the developments within. A bio structured facade offers glimpses of the research and development it envelops. A deliberately fragmented ground plane creates a porous edge for retail and emerging technology to bleed on the locomotive boulevard.

#### The Gazelle Workshop

The existing paint workshop provides a unique opportunity for an emerging business giant to flourish in this bespoke offering sandwiched between the resident village and creative precinct of Carriage works.

#### The Village

The residential village is the heart of the precinct. The antithesis of the suburban approach, the new village will connect workers and students to their place of their research work and education. Its proximity to public transport also make the village ideal for affordable housing including universal key worker and independent living accommodation. This collocation will enliven the place as a genuine 24hr precinct.

#### Connected commercial clusters

Throughout the Precinct is a diverse range of commercial tenancies to cater for all business's in the innovation ecosystems. Start-ups, SME's and household names can all find a home here.



### **The Proposition**

As a not for profit, long term local landowner with a triple A rating, our desired outcomes are for the greater good, not short term development margins. We succeed simply by attracting more students and researchers and as such are willing to work with TfNSW to ensure that development margins across **both** the Knowledge Hub and North Eveleigh (East) are shared in the development of this Innovation Precinct.

#### The University of Sydney Factor:

Anchors Medical / Education	Led by the University of Sydney one of the worlds leading sandstone Universities with a 160 year history in the area the precinct would be also be open to UTS, University of Notre Dame and the Royal Prince Alfred research and teaching facilities and associated research institutes.
Industry	The University of Sydney had revenues of \$140m from commerclisation of research in 2017 and entererd partnerships with Global companies such as Qantas, Bhp, Microsoft, Google. The University would seek to leverage these existing research partnerships while attracting new industries - the precinct would provide a variety of heritage and contemporary commercial space in various sizes for SME's through to large tech and medical enterprises.
Accelerators Incubators Start Ups Hubs	As a founding member of Cicado, Australian's leading Tech incubator the University would leverage its experience, engineering and research facilities to provide significant discounted incubator space supported by extensive fabrication and rapid prototype facilities.
Multi Aged Acommodation	As the largest local accommodation provider the University proposes a limited number of full price residential apartments while offering a mixture of affordable key worker housing, student accommodation and aged housing to reduce housing pressure on the surrounding areas.
Heritage	Established in 1850 and recognised as the original Australian Sandstone University, the University of Sydney has extensive experience in the protection and adaptive reuse of heritage spaces and would seek to retain and integrate the Paint Sheds into the development.
Community	The University proposes to develop with the RPA an early learning centre of excellence including early childhood disease research space in the repurposed heritage buildings on Wilson St and would seek to expand its existing medical and sports facilities into the preinct.
Open Space	Regarded as one of the worlds Top Ten most beautiful campuses, the University intends to provide an abundance of generous interesting open spaces, art installations and integrated placemaking and blend these with its Camperdown campus grounds all managed by its Campus Grounds Teams.
Retail	The University already manages over $3,000  \mathrm{M}^2$ retail units on campus and would seek to deliver an activated ground floor plane with a variety of quality retail offerings catering to the commercial, residential and art precincts.
Culture	With multiple museums, performance venues such as the Seymour Centre and a dedicated arts and events team, the University would extend its campus programming into North Eveleigh and provide a variety of cultural and art programs.

The Knowledge Hub and North Eveleigh (East) are not just complementary but co-dependent to truly achieving the critical mass that international benchmarks indicate is required for the North Eveleigh precinct and wider Area to succeed — we truly believe the sum can be significantly greater than the parts.

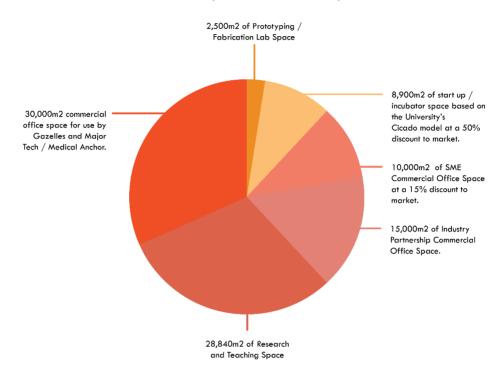
In the creation of an innovation district, there is no more appropriate partner that a University and amongst NSW Universities we are adjacent North Eveleigh and can show exemplary existing leadership in delivering the constituent parts.

The proposal as currently tabled would deliver the following outcomes for TfNSW and the State and can be adjusted subject to retaining the necessary innovation infrastructure.

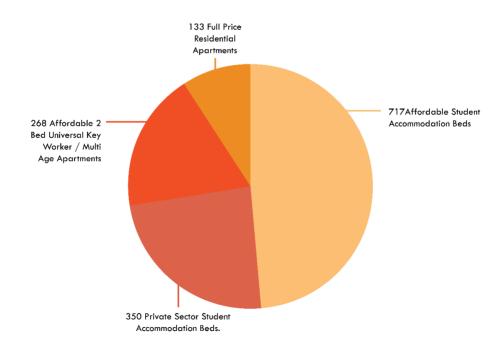
## 1. A market land value for North Eveleigh (East) and/or an annual income stream subject to TfNSW preference and equity contribution

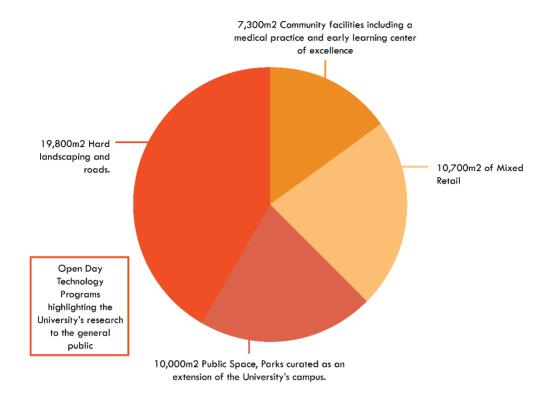
#### 2. Shared Development Profit from the University's Knowledge Hub

#### 3. Innovation Infrastructure (Gross Floor Area)



#### 4. Community Infrastructure (Gross Floor Area)





#### 5. Transport Infrastructure



Upgrade of Redfern Station (assuming money from divestment is ring-fenced and reallocated to Redfern).



A bridge connection to the Australian Technology Park (subject to ATP approval)



Pedestrian and cycle connections through precinct connecting Darlington with Redfern and Waterloo.



AEV ready infrastructure including a commitment from the University to develop and trial associated research within the Precinct.

#### 6. Culture

Extensive Arts and Events Program curated by the University's events team and existing culture partners.

#### 7. Economics Benefits (10 year aggregate)\*

In addition to positioning Sydney as a global innovation leader, the precinct will attract talent and investment, the University has engaged SGS Economics & Planning to broadly estimate the economic impacts for NSW linked with the University's proposal, their approach has been to:

- Identify the direct economic stimulus the proposal generates for the NSW economy over a ten-year period, covering the proposal's construction and initial years of operation.
- Include a range reflects the low and high scenarios for wider productivity uplifts across the broader catchment, i.e. 1% versus 10% which is well within GSC expectations.
- Use this stimulus to shock a Computable General Equilibrium (CGE) model of the NSW
  economy to assess how total economic activity levels change across a range of
  macroeconomic variables as per NSW Treasury's preferred approach.



### **Development Options**

A number of funding and delivery options are available which could reduce TfNSW risk and the University's capital requirements by leveraging the University's significant existing asset base and future Knowledge Hub development pipeline while ensuring Precinct Outcomes can be achieved, these include;

#### 1. Co-development with TfNSW (Preferred model)

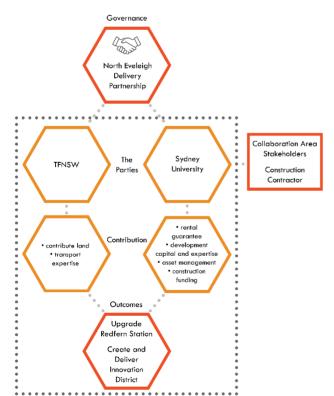
The University of Sydney has a strong track record of delivering major construction projects and regularly partners with Australia's best contractors to deliver world class facilities on and off campus. The University proposes to establish a **North Eveleigh Delivery Agency** that will oversee the development, construction and ongoing operation of this site.

The North Eveleigh Delivery Agency will take on the role of the Governance Authority. It will oversee the planning, urban design, innovation ecosystem and facilitate the integrated delivery of transport infrastructure in line with construction activity.

The Governance Authority will have representatives from both TfNSW and the University with the support of known and trusted construction partners to develop the precinct. The partnership ensures project oversight by the key parties, with each party bringing a unique and complimentary contribution to the project.

We propose that the North Eveleigh Delivery Agency will be based on a model established by Transport for London's Property Partnerships, which has enabled Transport for London to joint venture with developers to support the recycling of capital from development into the delivery of transport services.

In 2017 alone, Transport for London's Property Partnerships will generate £3.4bn in non-fare commercial revenue for reinvestment in London's transport network.



Transport for London, like Transport for NSW, has a significant property portfolio, making both Transport providers custodians of large tracts of land that can be used to support precinct renewal and the delivery of transport services in their respective cities. The London approach retains TfNSW with an ownership portion of the land and secures a long term financial interest in the land, thus sharing in the profit generated from the subsequent development of the land.

This approach enables revitalization of North Eveleigh, long term revenue stream for Transport, enhanced transport and economic outcomes and the ability to draw on the skills and expertise of a Partnership with the University.

This is our preferred approach and can generate a mixture of up front capital and ongoing revenue stream subject to TfNSW preference - we are willing to work with TfNSW to structure a deal to the benefit of both parties.

#### 2. Purchase or Land exchange

The University purchase the land outright as a strategic acquisition at a market value commensurate with the land use, economic impact and balance of funds required to upgrade Redfern station / provide ATP bridge connection and develops it (with or without partners) over time.

The University has significant land throughout the future Western Innovation Corridor including substantial land holdings at Badgerys Creek and Bringelly – refer figure 14 below.

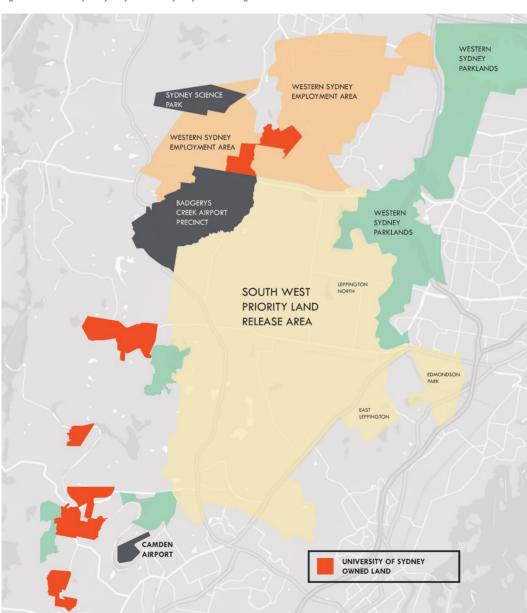


Figure 14: University of Sydney Western Sydney land holdings

Should it be of interest to TfNSW the University is prepared to discuss a land swap to the benefit of both parties.

#### 3. Anchor tenant or take-out purchaser

The University may be prepared to commit to a long term lease over all or parts of the non-residential component of the development as long as the rents are reflective of the University's contribution to the precinct and there is a take-out option to purchase upon lease expiry.

#### 4. Influencing

In the event that TfNSW embark on a market tender for the highest and best use of the site, the University is of the strong opinion that this will result in the development of multi-unit residential which not deliver on the GSC aspirations or economic potential of the Collaboration Area.

In the event that TfNSW embark on a market tender, the University would seek to work with TfNSW to stipulate specific precinct shaping outcomes within the tender including that all bidders provide a minimum amount of space for the University to establish an Innovation Precinct.

### **Compliance Table**

The University's vision for Redfern Station and North Eveleigh is directly aligned and compliant with both existing and emerging government policies.

Most relevantly, it directly accords with the Greater Sydney Commissions **Camperdown-Ultimo Health and Education collaboration precinct** which has been identified by the State Government as one of five, top priorities for 2017-18. It also accords with Future Transports "Greater Sydney: Draft Services and Infrastructure Plan". Both strategies commit to developing 'a Place Strategy and Infrastructure Plan' to 'respond to unprecedented growth and investment'.

Both government strategies see the Camperdown-Ultimo precinct significantly expanding its health and education industry and services. It sees the precinct as having the potential for providing significantly more employment and needing better transport connectivity. To achieve these goals the major education and health providers will need suitably located and serviced land to grow on. The North Eveleigh precinct is perfectly placed to provide this.

The University's proposal also ensures that Transport for NSW can secure a reasonable return on its land, even with the Government's new policy of "... protecting all employment zoned land from conversion to residential development, including conversion to mixed use zones" as outlined in the revised Metropolitan Plan: a metropolis of three cities.

Plan or Strategy		Yes/No
GSC - Greater Sydney Regional Plan - A metropolis of three cities.		
Objective 1: Infrastructure and collaboration. "Planning decisions need to support new infrastructure including cultural, education, health, and water infrastructure"	Strategy 1.1 Prioritise infrastructure investments to support the vision of a metropolis of three cities.	Yes
	Strategy 1.2 Sequence growth across the three cities to promote north-south and east-west connections	Yes
	Strategy 4.1 Maximise the utility of existing infrastructure assets and consider strategies to influence behaviour changes, to reduce the demand for new infrastructure, including supporting the development of adaptive and flexible regulations to allow decentralised utilities.	Yes
Objective 5: Infrastructure and collaboration	Camperdown-Ultimo health and education precinct is identified as one five top priority collaboration precincts for 2017-18	Yes
Liveability		
Objective 6 Services and infrastructure meet communities changing needs.	Strategy 6.1 Deliver social infrastructure to reflect the needs of the community now and in the future.	Yes
	Strategy 6.2 Optimise the use of available public land for social infrastructure.	Yes
Objective 7 Communities are healthy, resilient and socially connected	Strategy 7.1 Deliver inclusive places for people of all ages and abilities that support healthy, resilient and socially connected communities by:	

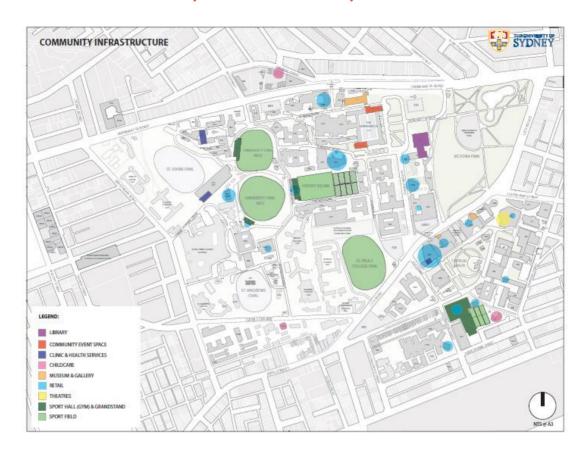
	life and a human scale	
	<ul> <li>Co-locating schools, social, health, and sporting, cultural and shared facilities.</li> </ul>	
Objective 8 Greater Sydney's communities are culturally rich with diverse neighbourhoods	Strategy 8.1 Consider cultural diversity in strategic planning and engagement.	Yes
Objective 9 Greater Sydney celebrates the arts and supports creative industries and innovation	Strategy 9.1 Facilitate opportunities for creative and artistic expression and participation, wherever feasible with a minimum regulatory burden, including: creative arts and cultural enterprises and facilities creative interim and temporary uses and appropriate development of the night-time economy.	Yes
Objective 11 Housing is more diverse and affordable	Strategy 11.1 Affordable Rental Housing Target schemes.	Yes
	Strategy 11.2 State agencies, when disposing or developing surplus land for residential or mixed-use projects include, where viable, a range of initiatives to address housing diversity and/or affordable rental housing.	Yes
Objective 12 Great places that bring people together	Deliver great places by:  - prioritising a people-friendly public realm and open spaces as a central organising design principle  - recognising and balancing the dual function of streets as places for people and movement  - providing fine grain urban form, high amenity and walkability  - integrating social infrastructure to support social connections and provide a community hub  - encouraging contemporary interpretation of heritage where possible  - using a place-based and collaborative approach throughout planning, design, development and management.  Strategy 12.2 In Collaboration Areas, Priority Precincts and planning for centres:  - investigate opportunities for precinct based provision of adaptable car parking and infrastructure in lieu of private provision of car parking  - ensure parking availability takes into account the level of access by public transport  - consider the capacity for places to change and evolve, and accommodate diverse activities over time.	Yes
Objective 13 Environmental heritage is conserved and enhanced	Strategy 13.1 Conserve and enhance environmental heritage by:  - engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values  - conserving and interpreting Aboriginal, European and natural heritage to foster distinctive local places.	Yes

Objective 14 A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities	Strategy 14.1 Integrate land use and transport plans to deliver the 30-minute city.	Yes
	Strategy 14.3 Support innovative approaches to the operation of business, educational and institutional establishments to improve the performance of the transport network.	Yes
Objective 15 The Eastern, GPOP and Western Economic Corridors are better connected and more competitive	Strategy 15.2 Co-locate health, education, social and community facilities in strategic centres along the economic corridors.	Yes
Objective 18 Harbour CBD is stronger and more competitive	Strategy 18.1 Prioritise:  - public transport projects to the Harbour CBD to improve business-to-business connections and support the 30-minute city - infrastructure investments which enhance walkability and cycling, particularly those focused on access to the transport network, and within five kilometres of any strategic centre or within 10 kilometres of the Harbour CBD.	Yes
	Develop and implement land use and infrastructure plans which strengthen the international competitiveness of the Harbour CBD and grow its vibrancy by:  - further growing an internationally competitive commercial sector to support an innovation economy  - providing residential development without compromising the objectives for commercial development  - providing a wide range of cultural, entertainment, arts and leisure activities  - providing for a diverse and vibrant night-time economy, in a way that responds to	Yes
Objective 21 Internationally competitive health, education, research and innovation precincts	strategy 21.1 Develop and implement land use and infrastructure plans for health and education precincts that:  • create the conditions for the continued colocation of health and education facilities, and services to support the precinct and growth of the precincts  • have high levels of accessibility  • attract associated businesses, industries and commercialisation of research  • facilitate housing opportunities for students and workers within 30 minutes of the precinct.	Yes
Objective 22 Investment and business activity in centres	Strategy 22.1 Provide access to jobs, goods and services in centres by:  attracting significant investment and business activity in strategic centres to provide jobs growth  diversifying the range of activities in all centres	Yes

<ul> <li>creating vibrant, safe places and quality public realm</li> <li>balancing the efficient movement of people and goods with supporting the liveability of places on the road network</li> <li>improving the walkability within and to the centre</li> <li>completing and improving a safe and connected cycling network to and within the centre</li> <li>improving public transport services to all strategic centres</li> <li>creating the conditions for residential development within strategic centres and within walking distance, but not at the expense of the attraction and growth of jobs, retailing and services; where appropriate, strategic centres should define commercial cores informed by an assessment of their need.</li> </ul>
<ul> <li>balancing the efficient movement of people and goods with supporting the liveability of places on the road network</li> <li>improving the walkability within and to the centre</li> <li>completing and improving a safe and connected cycling network to and within the centre</li> <li>improving public transport services to all strategic centres</li> <li>creating the conditions for residential development within strategic centres and within walking distance, but not at the expense of the attraction and growth of jobs, retailing and services; where appropriate, strategic centres should define commercial cores informed by an assessment</li> </ul>
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<ul> <li>creating the conditions for residential development within strategic centres and within walking distance, but not at the expense of the attraction and growth of jobs, retailing and services; where appropriate, strategic centres should define commercial cores informed by an assessment</li> </ul>
jobs, retailing and services; where appropriate, strategic centres should define commercial cores informed by an assessment
Objective 23 Industrial and urban services land is planned, protected and managed  Strategy 23.1 Industrial land in the three cities is to be managed in line with the principles set out in this draft Greater Sydney Region Plan.  Yes
Strategy 24.1 Consider the barriers to the growth of internationally competitive trade sectors including engaging with industry and assessing regulatory barriers.
Sustainability
Objective 33 A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change by 2050 especially through the establishment of low-carbon precincts in Priority Growth Areas, Priority Precincts and Collaboration Areas.
Strategy 34.1 Support precinct-based initiatives to increase renewable energy, and energy and water efficiency especially in Priority Growth Areas, Priority Precincts, Collaboration Areas and State Significant Precincts.
GSC - Draft Eastern City District
Plan Oct 17
Priority E1. Planning for a city supported by infrastructure Yes
Priority E1. Planning for a city supported by infrastructure Yes Priority E2. Working through collaboration Yes
Priority E1. Planning for a city supported by infrastructure Yes Priority E2. Working through collaboration Yes Priority E3 Providing services and social infrastructure to meet people's changing needs
Priority E1.  Planning for a city supported by infrastructure  Priority E2.  Priority E3  Providing services and social infrastructure to meet people's changing needs  Priority E4.  Priority E4.  Priority E4.  Providing services and social infrastructure to meet people's changing needs  Fostering healthy, creative, culturally rich and socially connected communities
Priority E1.  Planning for a city supported by infrastructure  Priority E2.  Priority E3  Providing services and social infrastructure to meet people's changing needs  Priority E4.  Priority E4.  Planning for a city supported by infrastructure  Yes  Yes  Priority E3  Providing services and social infrastructure to meet people's changing needs  Yes
Priority E1.  Planning for a city supported by infrastructure Priority E2.  Priority E3  Providing services and social infrastructure to meet people's changing needs Priority E4.  Priority E4.  Providing healthy, creative, culturally rich and socially connected communities Priority E5.  Providing housing supply, choice and affordability, with access to jobs and services.  Priority E6.  Creating and renewing great places and local  Yes
Priority E1.  Planning for a city supported by infrastructure  Priority E2.  Priority E3  Providing services and social infrastructure to meet people's changing needs  Priority E4.  Fostering healthy, creative, culturally rich and socially connected communities  Priority E5.  Providing housing supply, choice and affordability, with access to jobs and services.
Priority E1.  Planning for a city supported by infrastructure Priority E2.  Working through collaboration Priority E3 Providing services and social infrastructure to meet people's changing needs Priority E4. Fostering healthy, creative, culturally rich and socially connected communities Priority E5. Providing housing supply, choice and affordability, with access to jobs and services. Priority E6. Creating and renewing great places and local centres, and respecting the District's heritage. Priority E7. Growing a stronger and more competitive Harbour Yes

Priority E10. D	Delivering integrated land use and transport		
D. 1. 1. E44	planning and a 30-minute city	Yes	
Priority E11.	Growing investment, business opportunities and jobs in strategic centres		
Driagity F12			
Priority E12.	Protecting industrial and urban services land		
Priority E13.	Supporting growth of targeted industry sectors		
Priority E18	Delivering high quality open space	Yes	
UrbanGrowth NSW's: Central to Eveleigh Urban Transformation Strategy			
Key Move 1	Renew Redfern Station	Yes	
Key Move 2	Create a green network	Yes	
Key move 3	Create connections across the railway corridor for	Yes	
	walking and cycling		
Key Move 4	Connect the city with surrounding places		
Key Move 6	Create Centres of activity around stations		
Key Move 7	Create a centre for Sydney's growing economies		
Key Move 8	Strengthen arts, culture and heritage	Yes	
Future Transports: Greater Sydney: Draft Services and Infrastructure Plan			
Outcome 3:	Ensure walking or cycling is the most convenient option for short trips around centres and local areas, supported by a safe road environment and suitable pathways	Yes	
Outcome 4:	Vibrant centres supported by streets that balance the need for convenient access with enhancing the attractiveness of our places		
Outcome 5:	30 minute access for customers to their nearest centre by public transport, seven days a week	Yes	
Outcome 10	Fully accessible transport for all customer	Yes	
Other Government Strategies			
Commonwealth	Smart Cities Plan	Yes	
Commonwealth	Medical Technologies and Pharmaceuticals Growth Centre - MTPConnect	Yes	
State	Health Infrastructure NSW Health and Super Precincts	Yes	
State	Jobs for NSW Hubs and Cluster Development Program	Yes	
Sydney City Council	Sustainable Sydney 2030	Yes	

#### Annexure A – University Provided Community Infrastructure



#### Annexure B - Refer separate Cox Architecture Report

• North Eveleigh 171030.pdf (37.9 MB)

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# UNIVERSITY OF SYDNEY REGISTRATION OF INTEREST



# CHIEF MECHANICAL ENGINEER'S BUILDING

**505 WILSON STREET, REDFERN** 

#### **UNIVERSITY CONTACT DETAILS**

Mr Greg Robinson
Chief University Infrastructure Officer

www.sydney.edu.au

## WHAT INDUSTRY/SECTOR DOES YOUR BUSINESS OPERATE IN?

The University of Sydney (University) is in the higher Education Sector. The University was founded in 1850 as a public institution of higher education. Our excellence in research and teaching makes the University of Sydney one of the top universities in Australia and highly ranked among the best universities in the world. Our graduates are ranked 1<sup>st</sup> in Australia and 4<sup>th</sup> in the world for graduate employability. Since our inception, we have believed in education for all and leadership that improves lives in all communities we serve.

# WHAT IS YOUR PROPOSED USE OF THE CHIEF MECHANICAL ENGINEER'S BUILDING?

As the Chief Mechanical Engineer's Building (CME) has sat vacant for over 30 plus years with some minor façade works carried out circa 2015, the University has previously approached Transport for NSW (TforNSW) with regards to the potential use of this building by the University. The University is looking to expand its Sydney School of Architecture, Design and Planning (School) in Darlington. The School has over 100 years of world-class teaching and research and is one of the world's top 25 schools in the field of architecture and built environment. The School currently has around 3,000 full-time and part-time students.

The expansion of the School in CME would be an excellent and appropriate adaptive reuse of the building, as the majority of the spaces within the building were previously used as drafting rooms by railway engineers. The University would look to create a teaching and learning space, providing design studios, teaching spaces, and seminar rooms. This use would activate the site and create a sense of place and community.

The use would be in keeping with the Redfern North Eveleigh Precinct Renewal Strategic Vision is to change both the physical and social environment of the surrounding areas by activating the building, and increasing the pedestrian traffic within the areas without increasing the vehicular traffic.

# WHAT MODIFICATIONS (IF ANY) WOULD YOU REQUIRE TO THE BUILDING?

The University of Sydney understands that in March 2022 TforNSW requested from the Department of Planning the Secretary's environmental assessment requirements for the CME Building to allow for the preparation of the Development Application and Environmental Impact Statement.

Due to the completion date not being until early 2024. The University is proposing the following for consideration by TforNSW:

- An agreement to Lease and Lease will be entered into by University
- University will manage the refurbishment works and their fit-out works for the premises on behalf of TforfNSW; the cost of these works will be incurred by TforfNSW

The University has produced a concept plan for teaching and learning use which is set out below:

#### **Concept Plan for Sydney School of Architecture, Design and Planning**

## CME Building



The University of Sydney Page 10

# HOW WOULD YOUR PROPOSED USE BENEFIT FROM BEING LOCATED IN THE CHIEF MECHANICAL ENGINEER'S BUILDING AND BEING PART OF THE BROADER REDFERN NORTH EVELEIGH PRECINCT?

The proposed Teaching and Learning use by the University would benefit in immediately activating the CME and the broader Redfern North Eveleigh Precinct as they would reinvigorate this landmark building and create a vibrant, engaging and attractive environment. The University also has an excellent reputation and history of celebrating, occupying, and appropriately using and maintaining heritage buildings. Some key benefits of teaching and learning use include:

- Activating the site that has stood vacant for over 30 years
- Creating a sense of place, giving the location an identity and forming a gateway entry to the North Eveleigh Precinct
- Strengthening the connection between the University and the local community by delivering on the community's desire to conserve the heritage buildings on North Eveleigh for adaptive reuse
- The Government benefits from a direct saving of using the University's very experienced University Infrastructure unit to oversee and manage the refurbishment and fit-out works for the building
- The School would not require any car parking as the students would continue to utilise the existing parking on campus provided by the University.
- Add further vibrancy to the community through the presence of students coming and going and being on site
- Add value to the local economy and the community through the students and staff shopping, eating and participating locally.
- Increase community safety and reduce the potential for crime by increasing the natural surveillance of the area through the students and staff being on-site and coming and going from classes throughout the day
- provide opportunities for free events for the community through students showcasing their architecture and design projects

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# THE OPPORTUNITIES FOR THE NORTH EVELEIGH NODE IN THE TECH CENTRAL PRECINCT

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#### 1. Introduction

The North Eveleigh sub Precinct or node represents a strategic opportunity for the major Institutional anchors which form the Tech Central Alliance (formerly the Camperdown Ultimo Alliance).

The University of Sydney, University of Technology Sydney and the Sydney Local Health District are keen to work with TfNSW and the State Government to develop a strategy for the Tech Central North Eveleigh node which optimises the local research, collaboration and industry "ecosystem" to complement the tech-focused Central Station node and the Bio-Hub-focused Camperdown node (known as CHERP). Together, the three key nodes will contribute strongly to delivering the NSW Governments 20 Year R&D Roadmap<sup>1</sup>.

This document highlights the importance of the Tech Central Alliance advocating for a compelling research innovation and deep technology vision for the future of the North Eveleigh precinct. There is a unique opportunity to leverage and curate the existing combination of research expertise and infrastructure, industry partnerships and a cohort of incubators and startups (across diverse sectors) who are building the industries of the future.

North Eveleigh is a great place to live, work, study and play and decisions about its future should be inclusive and exciting for all stakeholders. Its vision should be additive, capitalising on its potential to play a major role in Tech Central being recognised as a world class innovation and research district.

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<sup>&</sup>lt;sup>1</sup> https://www.chiefscientist.nsw.gov.au/rdnsw/nsw-20-year-r-and-d-roadmap

#### 2. Current Status

The North Eveleigh node captures Redfern Station, North and South Eveleigh, the University of Sydney's Camperdown and Darlington campuses. It is close to the Sydney CBD and Central and mostly comprises of land owned by TfNSW/TAHE<sup>2</sup>. Its physical connection to the Camperdown health node is demonstrated daily by the contingent of health workers who arrive at Redfern Station throughout the day and make their way to RPA, many using the RPA or Sydney University shuttle bus. Strong links also exist between CICADA Innovation and the RPA campus as well as the other Alliance partners.

In 2008, a Concept Plan for mixed-use development was approved for the Precinct, including residential, commercial, retail and cultural uses. The plan proposed the reuse of heritage buildings together with new buildings of up to 16 storeys.

Carriageworks, one of Sydney's preeminent cultural institutions, draws people to a range of events and to its popular weekend markets. The construction of the "Southern Concourse" bridge and associated shared way works in Little Eveleigh Street by TfNSW are the most significant recent improvements made to footways connecting Redfern Station with the South Eveleigh and the University of Sydney/Darlington. No response has been provided to submissions arguing that pedestrians crossing the bridge from South Eveleigh to North Eveleigh, and vice versa, should not be required to "tap on and off". To date TfNSW has only seen the bridge as a connection to the rail platforms, and not playing a role in connecting precinct places.

In March 2021, the NSW Government produced 'The Redfern North Eveleigh Strategic Vision'.

The 'Vision' document highlights the following principles:

- Heritage reuse, including arts and cultural spaces
- Aboriginal and Torres Strait Islander history, culture, and future connection
- Connectivity digital, walking, cycling, links to Tech Central, Camperdown -Ultimo
   Collaboration area, upgraded Redfern Station, spaces for jobs
- Integration with the Three Cities strategic vision<sup>3</sup> for the City East
- Plans for each of the sub precincts (e.g. the historic Clothing Store building)
- Relatively low density in mixed use/housing/commercial vision with a proportion of affordable housing

<sup>&</sup>lt;sup>2</sup> Transport Asset Holding Entity (TAHE) is a State Owned Corporation that manages NSW transport assets such as train stations, retail spaces, rail track, signals, power systems, significant land holding around stations. https://tahensw.com.au/

<sup>&</sup>lt;sup>3</sup> Greater Sydney Commission https://www.greater.sydney/metropolis-of-three-cities



It notes that the Vision will be centrally planned, and government led. To date, consultation with key precinct stakeholders has not been extensive.

The Strategic Vision identifies the 'next steps' as being:

- Develop and assess options for the Precinct layout, informed by detailed technical studies, a State design review panel, and community/stakeholder feedback
- Produce a new plan to build on the approved 2008 Concept Plan, including governance arrangements including for Aboriginal inclusion and engagement, height, adaptive reuse, connection with Redfern Station, and night-time economy opportunities
- Identify required changes to planning controls to execute the above via a State Significant Project Study

Many of the principles in the document are welcome and positive. However, whilst the document mentions its university and tech neighbours, and speaks of connections, the vision does not address a number of strategic opportunities.

The Tech Central Alliance is keen to work with the State Government to develop a more inclusive vision for North Eveleigh.

Such an approach, based on genuine stakeholder engagement, will provide meaningful input to inform future infrastructure and space requirements, and help to build on current precinct attributes, to grow the industries and jobs of the future.

#### 3. Policy Context

#### a. Tech Central

The NSW Government has made considerable investment and created media attention for the 'Tech Central' project. The Government has identified 6 neighbourhoods<sup>4</sup> in the area:

- Central Station/Haymarket
- Ultimo
- Surry Hills
- (Darlington) North-Eveleigh
- South Eveleigh
- Camperdown

The NSW Government describes Tech Central below:

#### **Tech Central** (https://www.global.nsw.gov.au/precincts/tech-central)

'As the future focal point of Sydney's innovation and technology community, Tech Central will create a vibrant innovation and technology precinct in the heart of Sydney's CBD, with strong links to international markets, Greater Sydney, and the rest of NSW.

Home to the Sydney Quantum Academy and future Space Industry Hub, Tech Central will future proof and diversify the New South Wales economy and cement its position as a leader in:

- Fintech, Cyber and e-Health
- Digital and deep technology including quantum, blockchain, AI, robotics, IOT and analytics
- Creative industries including VR and game design

Tech Central will provide up to 250,000 square metres of space for technology companies, including 50,000 square metres at affordable rates for start-ups and scaleups, in a connected location brimming with heritage, culture and activity.

A NSW Government funding package of \$48.2 million has kick-started development and tech giant Atlassian is confirmed as anchor tenant. It will locate its headquarters in the precinct, bringing over 4,000 employees.

Highly ranked nearby institutions including the University of Sydney, University of Technology Sydney, Royal Prince Alfred Hospital and CSIRO's Data61 are looking to further collaborate with business on joint research, commercialisation and graduate programs.

It should be noted that there is a public perception that Tech Central consists of the area within 500 metres of Central Station. This misunderstanding has the potential to limit realising the true potential of the both the Camperdown Health, Education and Research Precinct (Camperdown node) and Darlington/North Eveleigh node.

<sup>&</sup>lt;sup>4</sup> https://www.greater.sydney/precincts-and-collaboration-areas/precincts

#### b. The NSW 20 year R&D Roadmap<sup>5</sup>

In May 2022, the NSW Government unveiled its long-term strategy for turning the state's research and development (R&D) capabilities into world-leading industries and jobs for future generations. The strategy aims to make NSW a global and national R&D leader.

Its author, the NSW Chief Scientist and Engineer, identified four technology themes from the Innovation and Productivity Scorecard<sup>6</sup> in the 'Roadmap': digital, materials and chemistry, biotechnology, and energy. He notes 39 applications to help focus R&D investment by government and industry over the next 20 years.

#### c. The North Eveleigh Node

There is an important opportunity in North Eveleigh to meaningfully envision a long-term future.

In this context, the 2021 *Vision* document for North Eveleigh needs to better address opportunities such as:

- to drive new knowledge jobs for NSW
- potential collaborative developments with the large land-holding neighbours
- engaging with private and/or NFP capital

#### 4. Realising the potential of the North Eveleigh node

The Tech Central Alliance is keen to bring <u>all parts of North Eveleigh</u> together, making the whole greater than the sum of the parts – socially, economically, and characterised by vibrant public amenity.

The core elements of this vision are as follows:

- The development of a USYD Engineering space which could link to start-ups, scale-ups and
  established industries in deep tech. This would include facilities for disciplines such as
  quantum, materials science, artificial intelligence, robotics and virtual reality and allow the
  University to maintain its internationally recognised excellence in established specialties
  such as aerospace and robotics.
- Strong collaborative linkages between UTS, UNSW, USYD and Health with new deep tech
  infrastructure being collaboratively developed similar to the Quantum Terminal but focused
  on AI, Robotics and Aerospace
- An expansion of CICADA innovations to further realise its potential as a cross-University incubator for innovation, early discovery, education, and research
- A strong emphasis on affordable housing focused on key workers, knowledge workers, and student accommodation (UTS + USYD)
- Collaborative implementation of the Tech Central Transport Strategy
- A strong industry focus, supported by research and university linkages

extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.investment.nsw.gov.au/assets/Uploads/files/IPC/24d3bd9f76/NSW-Innovation-and-Productivity-Scorecard-2022.pdf

<sup>&</sup>lt;sup>5</sup> 'NSW Government 20 Year R&D Roadmap Released' media release 3/5/22, see also https://www.chiefscientist.nsw.gov.au/rdnsw/nsw-20-year-r-and-d-roadmap <sup>6</sup> chrome-

- The realisation of a strong creative and cultural precinct through linking and developing Carriageworks, Seymour Centre etc
- A commitment to Aboriginal/indigenous industry and cultural developments

#### a. Recasting the Vision

This approach can be achieved by a more holistic approach to planning for the sub precinct. Whilst there are challenges to developing an integrated vision, the University of Sydney for example has identified catalyst opportunities in its Darlington campus, which it is keen to explore with the State Government. These opportunities include land swaps, joint ventures, and strategies to help address the capacity and locational challenges which the NSW Government needs to address to fully deliver its innovation agenda.

#### b. The Value Proposition

A wholistic vision provides the opportunity to address longstanding transport challenges in the area, set out in the Tech Central Place Based Transport Strategy<sup>8</sup>. It will also impact positively on the future strategic TfNSW transport infrastructure needs, and could address a range of connectivity opportunities, including:

- Space to create a public transport interface on Cleveland Street/City Road;
- Better use of the underused City Road from Broadway to King Street;
- Future-proofed pedestrian and disability-friendly links from Redfern Station to South Eveleigh and Darlington, University and Missenden Road Health precinct;
- New or improved rail platform integration with these links;
- Improved road safety by creating better connections between Redfern Station and the campus,
- Physical links across the whole Tech Central Precinct; and
- Contribution to meeting capacity challenges<sup>9</sup>

#### Other key opportunities include:

- development of distinctive places and amenity including the further development of the Carriageworks cultural area and facilities to ensure that the North Eveleigh node becomes known as a significant Cultural centre;
- a new direction for the use of University lab spaces to help research collaboration between Tech Central nodes and maker spaces for technology research, and creative industries;
- job-producing industries co-locating with researchers to deliver diverse job opportunities in the precinct;
- shared job opportunities for the community and students at high traffic areas for
   Customer-facing medical clinics where supervised students might deliver services as part of

<sup>&</sup>lt;sup>7</sup> It is not the University's preference to be a 'developer' – instead to offer strategic public interest opportunities in partnership or join arrangements

<sup>&</sup>lt;sup>8</sup> https://future.transport.nsw.gov.au/plans/tech-central-place-based-transport-strategy

<sup>&</sup>lt;sup>9</sup> Refer to the City of Sydney Floor Space Survey, which is carried every five years https://data.cityofsydney.nsw.gov.au/datasets/fes-industry-of-occupation/explore

- their experiential study and research work including vaccination and public health services, and banking and financial services;
- residential areas being located closer to parks, pools, open space by relocating technical and industrial spaces to more appropriate sub-zones;.
- more and varied housing opportunities across the precincts.

Working together, TfNSW and the University can also address specific challenges including:

- A much needed upgrade for the University of Sydney Engineering precinct to respond to the
  new ways of delivering tomorrow's engineering teaching and research. It could include
  facilities for disciplines such as quantum, materials science, artificial intelligence, robotics
  and VR and allow the University to maintain its internationally recognised excellence in
  established specialties such as aerospace and robotics.
- Space to co-locate researchers and investors with future-focussed industry
- Increased capacity for the students who attend the Wentworth Building every day for student services including pastoral services, food and beverage, social and study space, medical and retail, student union, lockers. It is an important gathering place for students from all over Sydney and the world.
- A new approach to the vibrant performance activities at the Seymour Centre which is currently 'orphaned' from the high profile facilities of Carriageworks and South Eveleigh.

#### c. The New Narrative

An integrated approach to future planning for the North Eveleigh and Darlington is a unique opportunity. The time to do that planning is now.

By taking a "place based" approach, there is an opportunity to deliver a genuinely collaborative place which leverages its research and innovation strengths to deliver a Tech Central precinct which is accessible, liveable, innovative, high amenity, valuable and future-proofed.

Imagine this for a new North Eveleigh:

- ✓ Future focussed industries co-locating their R&D and people alongside world-leading University researchers
- ✓ High tech and engineering related university activities moving to the railway line, allowing for the redevelopment of land around the parks at Camperdown and a new future-focused engineering education hub.
- ✓ The Darlington and Eveleigh neighbourhoods becoming a 24/7 activated village close to desirable amenities including parks and pool and uni gym increasingly characterised by parks and open spaces and buildings which have mixed teaching, living, and working spaces.
- ✓ Students, including resident foreign students, getting genuine living experience in a community where they can live, work and play
- ✓ Carriageworks becoming a performance hub which incorporates the University's cultural activities.
- ✓ And a safe connected, pedestrian place.

The University of Sydney and the Tech Central Alliance seek a collaboration with TfNSW to deliver an integrated vision for North Eveleigh, making "the whole greater than the sum of the parts", by leveraging its existing attributes to optimise social and economic outcomes in a truly vibrant place.

The University of Sydney can work strategically with Transport for NSW to implement the recommendations of the Tech Central Place Based Transport Strategy to solve transport challenges around the sub-precinct including improving road safety around Camperdown, Darlington and Redfern and provision of a more seamless connection between Redfern Station and the campus.

This vision will also provide new opportunities for the University of Sydney to further leverage its economic contributions to the State. A relocated University of Sydney Engineering precinct to respond to the new ways of delivering tomorrow's engineering teaching and research. It could include facilities for disciplines such as quantum, materials science, artificial intelligence, robotics and VR and allow the Universities to maintain its internationally recognised excellence in established specialties such as aerospace and robotics.

Sharing University space with industry, the local community and its student population in innovative ways to deliver better connections for local people, visitors and students to creative and recreational opportunities through increased permeability across all the University's assets. There will be space to co-locate researchers and investors with future-focused industry, and increased capacity for students who attend the Wentworth Building every day for student services and as a gathering place for students from all over Sydney and the world.

North Eveleigh has the potential to be a significant research and industry collaboration hub, a cultural centre, a place which nurtures strong connections between the local Aboriginal community and a safe and beautiful environment with varied housing opportunities.

A partnership approach across Government and the University will release this myriad of opportunities, and ensure that the unique potential of the Darlington Eveleigh node to Tech Central is fully realised.

The University of Sydney together with its Tech Central Alliance partners is urging the NSW Government to consider what can be achieved for residents, students, businesses, academics and researchers through a more comprehensive vision for the area.

A 'Merged Precinct' model, based on a collaborative partnership is achievable and will meet all the objectives the community, industry and government highlighted in past consultation – AND MORE!

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#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 3:37 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** submission.docx

Submitted on Thu, 25/08/2022 - 15:33

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

#### Name

#### First name

Susie

#### Last name

Tuckwell

#### I would like my submission to remain confidential

No

#### Info

#### **Email**

#### Suburb/Town & Postcode

Redfern 2016

#### Please provide your view on the project

I object to it

#### Submission file

submission.docx

#### **Submission**

I object to the proposal and the reasons for this are contained in the Submission attached, but basically it is because the proposal is already outdated and needs to be rewritten in the light of current and future realities.

I have not made any reportable political donations in the previous two years.

#### I agree to the above statement

Yes

### SUBMISSION NORTH EVELEIGH PAINT SHOP PRECINCT

#### Introduction

The proposal is already out-of-date. Its 2008 origin shows in its failure to engage with today's issues including COVID, severe climate events, and the Sydney housing crisis.

The haste to get it all done with so little discussion/response time shows the developers' panic that the current government will not be returned. The whole process must be stopped until the planning process can be re-done in light of the realities of 2022 and beyond. I strongly DO NOT support the proposal as it stands.

No-one reading this is unaware of the 2022 realities: the current housing crisis for lower paid and mid-level paid workers as well as those on benefits (in our area, health workers, university staff and many Aboriginal people); post-pandemic learnings, including the health and social implications of mass illnesses and health measures in tight urban spaces; the lack of safe, suitable locations for outdoor physical activity for adults and children in Redfern and surrounding suburbs; the accelerating climate change emergency; and now the coming global conflict – none of these is addressed directly in the considered manner required to use our public land for our benefit.

After the Waterloo fiasco, the lesson learned seems to be to get the City of Sydney involved to develop better, independent solutions that can take these massive issues into account in a dispassionate, considered and thoughtful way. Not in a quick-fix, quick bucks way, but covering more appropriate land use zoning and floor-space ratios that prioritise post-Covid social and health needs, and respond appropriately to the coming extreme temperatures, especially by drastically reducing the floor space ratio in favour of humans rather than structures. Also, to limiting building heights to a scale appropriate to the Victorian neighbourhood.

#### Housing

As with other topics, the report is in a 2008 bubble. The Planning Report states affordable housing is needed to attract talent, support key local workers (of whom there are many because of the hospitals, etc.) and support vulnerable communities. It projects 381 – 449 new homes.

Minister Stokes mentions "30% social and affordable housing as a visible commitment to housing supply", but nothing in the planning documents commits to diverse housing or social housing. Only 15% (+/- 67.5 dwellings) is "affordable housing". This is a tokenistic nod to the local demand for safe, secure, stable housing for hospital workers, university staff and first responders. There has been a drastic price rise in accommodation in Redfern and surrounding areas. The pandemic has also caused a spike in divorce and domestic violence, with the need for safe, affordable accommodation as part of the strategy to keep families connected to community, schools, etc. These and similar planning realities must be front and centre of the Proposal's revised housing strategy.

There are many Aboriginal families with deep ties to the area. With the attachment of Indigenous people to Country, heavily promoted in the Report, why is there no dedicated Aboriginal housing strategy? The Report mentions "opportunities for Aboriginal rentals" "post renewal of the Paint Shop Sub Precinct" and 10% for Aboriginal housing, which are hardly resounding commitments to assuring continuing Aboriginal connection to Country.

#### Land Use - Open Space

The public open space in the Precinct is not protected in the planning controls as "recreation space". The land use zoning must be amended to provide certainty that the "open space" cannot be developed and must be used for recreation. Also, there are no easements or covenants to protect public open space permanently. This must be changed to protect the open space before building commences.

#### Land Use - Recreation, Exercise & Health

The Precinct is a rare, large, accessible, sunny, open space in our crowded little suburb. Yet, again, the planning documents fail to engage either with the 2022 reality of life for our inhabitants or with the learnings of the COVID years. This space – our space – needs to be planned first from what is needed, not what it going to make money for the State Government.

There is next-to-no useable open space in this part of our overcrowded little suburb except a small park in Abercrombie St, which is loved to death.

Tweens and teens have nowhere to be active for free, unless they cross very busy Cleveland St to Prince Alfred Park. Yet these youth are often the most socially troublesome cohort (graffiti, petty crime, etc). No skate board park, netball/basketball courts, and we know that the uptake by women of all ages of all codes of women's football has nationally outstripped fields and facilities. In addition, post COVID, there is a huge wave of mental health issues among young people. Physical activity and social connection are as effective as medication in mild to moderate anxiety and depression. The head medico of Westmead is telling us we will be building "factories" to cut off people's legs because our sedentary lifestyle is causing endemic diabetes.

The planning document do not engage with these realities. The land use planning in the Proposal is skewed to private/commercial uses.

The floor space ratios must be re-done to embrace the learnings of the pandemic about mental and physical health, and social well-being. The costs of not doing so are hidden but socially we pay the price. The pandemic showed the value of Carriageworks as a place for exercise and connection, which was eagerly taken up by locals of all ages.

The current design is designed to maximise structures and fudges the definition of "active spaces" without protecting even these. Land use zoning must be re-examined to provide for sporting facilities and recreational facilities for all ages.

#### Climate Change Crisis

Again, the proposal fails to engage coherently with the coming extreme weather events and extreme temperatures. The closest is the Pollution Report, (again reflecting the preoccupations of previous decades) which deals with climate issues in passing.

The recent heatwaves in the Northern Hemisphere have shown up the dangers of extreme heat. Measure taken included misting stations, and opening centres so people could access air-conditioning. Research shows the positive cooling effects of a dense urban tree canopy. Conversely, research also show the negative effects of extreme heat on crime and domestic violence.

Yet, once again, the proposal fails to interrogate these issues. Redfern is an old, crowded, and quite poor suburb. When the 50 degree heat comes, few will have the money to pay for cooling. Where to escape to from tiny, hot Victorian houses, and how to protect health? Will the 28-storey buildings and mooted 25% tree cover (not the CoS mandated 40%) quell or fire the heat effects? When the extreme weather events come, what plans are there to protect the Paint Shop's fragile heritage?

#### Aboriginal and Non-Aboriginal Heritage Protection

Much is made of heritage protection in the report. However, one only had to look at what has happened in Little Eveleigh St to see what this means in practice.

The fragile little Bootmakers' Union building has been gutted, defaced, and even the painted name has been virtually erased. Much was made to the residents of celebrating Aboriginal heritage. Nothing is visible. And the actual road is badly designed and likely to create future traffic and safety problems. Why will the Paint Shop 'renewal" be different?

#### **Global Conflict**

Any well-connected military person will confirm that global conflict is on the way. What is the wisdom in putting tall towers of people directly beside a railway station, where every line except one runs through? Which is more at risk, the station/lines or the towers/people? Where is the due diligence?

Ukranians have been protected by Cold War era bomb shelters. What might be role of the unused railway tunnels in the future? Should this be factored in to planning?

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 3:10 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

Subject:Webform submission from: Paint Shop sub-precinct rezoning proposalAttachments:carriageworks-paint-shops-north-eveleigh-submission-25-august-22.pdf

Submitted on Thu, 25/08/2022 - 15:07

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

# **Name**

#### First name

Blair

#### Last name

French

# I would like my submission to remain confidential

No

# Info

### **Email**

# Suburb/Town & Postcode

Newtown

# Please provide your view on the project

I object to it

### Submission file

carriageworks-paint-shops-north-eveleigh-submission-25-august-22.pdf

### **Submission**

See attached: Carriageworks Paint Shops North Eveleigh Submission 25 August 22

# I agree to the above statement



# **Submission**

25 August 2022

Transport NSW
Rezoning proposal for the Paint Shop
Sub-Precinct and Redfern North Eveleigh Precinct
Renewal

Cass O'Connor, Chair Blair French, CEO

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# 1) ACKNOWLEDGMENT OF COUNTRY

Carriageworks acknowledges the Gadigal People as the Traditional Owners and Custodians of the Redfern North Eveleigh Precinct. We seek to honour this place, its culture and people, in everything we do and offer respect to elders. We pay homage to the care that was given to this land in the millennia prior to conquest and the resilience of Aboriginal communities in the centuries after.

In the 20<sup>th</sup> Century, Redfern became an urban centre for Aboriginal peoples and culture, and a site of human rights activism. We lament the unregulated gentrification that has seen those communities diminished over the last fifty years and believe proposals for the redevelopment of the Redfern North Eveleigh Precinct are a rare and important opportunity to rectify some of the impact of that forced exodus.

# 2) EXECUTIVE SUMMARY

Carriageworks believes the time is right to redevelop the Redfern North Eveleigh Paint Shop Sub-Precinct and supports the Redfern North Eveleigh Precinct Vision (Vision) made public in 2021. However, Carriageworks objects to the Redfern North Eveleigh Precinct Renewal and Rezoning proposal on the grounds that it fails to maximise the potential of the site to support the needs of local communities and Sydney as a whole.

Our submission covers two discussions: i) the shortcomings in the existing planning proposals, and ii) how these can be improved for the benefit of local communities, Sydney and NSW as a whole.

# i. Planning and zoning

Our concerns focus on what we consider flawed planning and zoning. In particular:

- An unnecessarily siloed approach, which will result in three precincts instead of one.
- Inadequate consideration of the sub-precinct's role in the broader context of South Eveleigh, Redfern and Sydney.
- Duplication of zonings available in bulk nearby while not allowing for the bespoke needs, currently lacking in Sydney and NSW, of the Creative Industries (one of three priorities in NSW Government's vision for Tech Central).
- Inadequate respect for heritage: both the Paint Shop Building and the site itself.
- Inadequate consultation at the right stages with local communities and stakeholders (particularly First Nations), including Carriageworks.
- Confused interpretation of 'mixed-use' zoning, crashing together the needs of existing and new residents, office-workers, retail, F&B providers and events venues in a single sub-precinct.
- Inadequate provision or guarantee of specifically green spaces in an area of Sydney that needs more.
- Inadequate consideration of public (affordable and social) housing.
- Negative impact on the mission and operations of Carriageworks a State Significant Organisation supported by NSW Government.

• A missed opportunity, as a result of the above concerns, to redevelop a heritage site into a distinctive part of modern Sydney.

We believe the current planning and zoning proposals narrow the potential for the site and will turn a unique and historic part of Sydney into the sort of generic, mixed-use civic precinct that can be found anywhere else.

ii. Building the vision: North Eveleigh Creative Quarter
Building on the strategic vision for Redfern North Eveleigh<sup>1</sup>, we envision a distinctive
Creative Quarter within Tech Central drawing on the exceptional heritage of the site and serving the state's creative, tertiary education and cultural sectors, with Carriageworks at the heart.

A North Eveleigh Creative Quarter will put a focus on the 'screen sector' (film, broadcast and digital production, including augmented reality and gaming) with close ties to Sydney University and UTS. This sector is central to the creative industries, and therefore Tech Central itself, but its unique needs are not currently provided for in the plans for Central and South Eveleigh, or anywhere else in Sydney. This Creative Quarter will draw significant revenue, ensuring the return of business that has been draining to other states since the sale of Fox Studios in 2019.

The Creative Quarter will also offer studio space for artists and rehearsal facilities for the performing arts, connecting them closer with the screen sector. It will increase green space and it will preserve the low-rise heritage of the site, which is compromised by the high-rise towers in the current plan. It will keep Sydney abreast with the current site-sensitive approach to redevelopment evident in Lot Fourteen in Adelaide, Wynyard Quarter Innovation Precinct in Auckland, and Kings Cross Central and Digbeth in the UK.

We believe Carriageworks is key to the successful redevelopment of the Paint Shop Sub-Precinct and Redfern North Eveleigh, so we are surprised and disappointed by the brief and cursory engagement from Transport for NSW so far. Since the formation of the organisation in 2006, Carriageworks - as main tenant - has led place-making in the precinct. Our knowledge and unique experience of the site is of benefit to the developers, the local community, visitors to the site, NSW's creative talent and Carriageworks itself.

# We can contribute by:

- Joining both the precinct and sub-precinct redevelopment and design committees so we can bring our experience of the precinct, its local communities and cultural placemaking to bear.
- Leading the public art programme: permanent and temporary art works, events and performances.
- Managing event and for-hire spaces in the Paint Shop Building, as well as other creative spaces, to ensure programming cohesion across the precinct, safe provision and greater impact.

<sup>&</sup>lt;sup>1</sup> 'A connected centre for living, creativity and employment opportunities' (Redfern North Eveleigh Strategic Vision, April 2022)

- Devising and delivering on-site creative education and learning programs for children and adults.
- Providing a base for First Nations artists, organisations and communities to engage with the redevelopment.

# 3) ABOUT CARRIAGEWORKS

Carriageworks is one of Australia's most distinctive cultural centres. We present performances, exhibitions and workshops that connect artists and audiences with contemporary ideas and issues. Centring First Nations art and culture at the heart, the programs emerge from our commitment to reflecting social and cultural diversity. We are artist-led, supporting the creative development of artists through dialogue with their peers and the public.

In keeping with the industrial heritage of the building and precinct, Carriageworks is a place of creative labour and production as well as a public venue. We are home to seven resident artistic companies who regularly present new work on-site. We also host a range of premier annual cultural events, including Sydney Festival, Sydney Contemporary Art Fair, Sydney Writers' Festival, Australian Fashion Week, Vivid Sydney, Festival of Dangerous Ideas and Liveworks Festival of Experimental Performance.

In 2017, Mirvac contracted Carriageworks to lead the public art strategy and cultural activation programme for South Eveleigh. We commissioned *Lobby Art* by Jonathan Jones, *Eveleigh Tree House* by Nell and *Interchange Pavilion* by Chris Fox. The last two are singled out for praise by Balarinji in the *Redfern North Eveleigh Precinct Redevelopment Public Art Strategy*.

Our work is enabled through a mixed income of commercial revenue derived from venue use and partnerships, public funding and the generous support of donors and foundations. We would not be able to do what we do without the support of Create NSW, the Australia Council for the Arts and other Federal funding agencies, Destination NSW, Oranges and Sardines Foundation, the Neilson Foundation, the Gonski Foundation, the Crown and Packer Family Foundations, the Tony Foundation and many others.

Carriageworks is governed by an independent Board comprising respected individuals from the worlds of finance, law, business, communications, public policy and the arts. Our commitment to First Nations artists and communities is reflected in the recent creation of a Director of First Nations Programs within the executive team, the First Nations Strategy Committee of external advisors and the Carriageworks Knowledge Circle of elders.

Geographically, Carriageworks sits on Gadigal land at the centre of the Redfern North Eveleigh Precinct. It acts as the bridge between the Paint Shop and Clothing Store subprecincts. As the largest and longest-standing tenant of the precinct, we have a unique understanding of the location and local communities. The future success of Carriageworks and the precinct as a whole are inextricably bound together.

# 4) OBJECTIONS TO PAINT SHOP SUB-PRECINCT REDEVELOPMENT PLANS

### 4.1 INTRODUCTION: WHY WE OBJECT

Carriageworks objects to the current plan to redevelop the Paint Shop sub-precinct on the grounds that it: a) will fail, because of flawed planning and zoning, to deliver 'a diverse, activated and attractive precinct for living, creativity and employment opportunities that supports innovation and the jobs of the future'; b) misses the opportunity to do something truly distinctive and visionary by delivering a new Creative Quarter within Tech Central (with strong ties to the state's creative, tertiary education and cultural sectors), that will also provide green space, social and affordable housing, and living cultural places for and designed by First Nations communities.

These shortcomings are a result of flawed planning and zoning, but also inadequate consultation with those communities and stakeholders who best understand the site and will be most affected by its redevelopment. As the Design Panel Review observes: 'advice has come at a late stage of the project'.<sup>3</sup> This has also been the experience of Carriageworks. Lack of enthusiasm, and sometimes overt criticism, is a common theme through the *Consultation Outcomes Report*. Instead, the whole project should have begun with a thorough and up-front enquiry into what Sydney's inner-city communities – and the city itself - needs.

As a consequence of inadequate consultation at concept stage, a defensiveness has emerged in the tone of Transport for NSW's engagement. On frequent enquiries how the Paint Shop sub-precinct plan fits into the wider context of North Eveleigh and Redfern, the answer is that those areas are 'outside the scope':

- 'The scope of the SSP is formally confined to the Paint-shop sub-precinct. The requested testing of alternate approaches to redistributing massing, GFA or open space, across the site is outside the scope of the project and urban design study'<sup>4</sup>
- 'specific commitments regarding the provision of housing to support the Aboriginal Community sit outside the scope of this urban design study.' 5

This narrowing of scope is a sign of bad planning, which can only succeed when a site is looked at in the greater context of its neighbours and Sydney as a whole.

This is of great importance when developing in Redfern: an urban area that only fifty years ago benefited from a community of over 12,000 First Nations people and now, largely through gentrification and top-down urban development, has less than 300. Any urban design study in the Redfern area that does not begin with First Nations insights nor considers the provision of housing to support the First Nations Community inevitably amplifies social inequality.

<sup>&</sup>lt;sup>2</sup> Explanation of Intended Effect Paint Shop Sub Precinct, July 2022

<sup>&</sup>lt;sup>3</sup> Consultation Outcomes Report, July 2022

<sup>&</sup>lt;sup>4</sup> Ibid.

<sup>&</sup>lt;sup>5</sup> Ibid.

It is also crucial in ensuring the success of Tech Central. The current redevelopment plan for the Paint Shop sub-precinct duplicates the generic, high-rise office space already offered at Central and South Eveleigh. Of equal importance for innovation and technology are spaces for making and production, which are central to the creative industries - one of three focuses in Government NSW's Tech Central strategy<sup>6</sup>.

What is most urgently needed by NSW's creative industries isn't more office space but large creative spaces - in particular broadcast, film and digital studios, but also artist studios and rehearsal venues for the performing arts. Ever since Fox Studios was sold to Disney, there has been no provision for the screen sector in or around Sydney and lucrative business is being lost to other states. This is an opportunity to address that need and reap the economic benefits it will bring.

The comments in our submission draw upon Carriageworks' history as the biggest tenant and cultural provider to the Redfern North Eveleigh Precinct and its local communities. Our concerns are rooted in our own experience, and the partners and communities we talk to and work with on a regular basis.

We believe that if Transport for NSW had begun this process with adequate community and stakeholder consultation, it would have heard about the need for ample green space within a heavily urbanised area, social housing, First Nations rights, creative studio space, a redevelopment which looks at the wider picture of the area, and a respect for heritage that is true to site history as well as architectural preservation.

Instead, this proposal will duplicate the 'tech hub' concepts of Central and South Eveleigh, add to the high-rise gentrification that continues to blight Redfern more broadly, and – through flawed planning and zoning - preclude a more imaginative use of the site.

This is a unique, once-in-a-decade opportunity to do something extraordinary for the distinctiveness and provision of our city, with long-term economic gains. With our help, Transport for NSW can create a ground-breaking and financially resilient precinct, but it requires significantly better planning.

# 4.2 CONCERN: A SILOED APPROACH - THREE PRECINCTS INSTEAD OF ONE

The proposal treats the sub-precinct as an isolated development site. The *Redfern North Eveleigh Strategic Vision* (April 2022) specifies that the Clothing Store Sub-Precinct 'will have a residential character that is integrated with community and commercial uses', but there is inadequate detail about what this will look like or how it will complement the similar offer in the Paint Shop sub-precinct.

<sup>&</sup>lt;sup>6</sup> NSW Government Tech Central website: 'Tech Central will future proof and diversify the NSW economy and cement its position as a leader in: finetech, cyber and ehealth; digital and deep technology including quantum, blockchain, artificial intelligence, robotics, internet of things and analytics; creative industries including virtual reality and game design.

<sup>&</sup>lt;sup>7</sup> Redfern North Eveleigh Strategic Vision (April 2022)

The references to the Carriageworks sub-precinct were written with minimal engagement with either Carriageworks or Create NSW (which holds a headlease over the Carriageworks and Blacksmiths Workshop sites through until 2114), as evidenced by the proposal to turn the pedestrianised Carriageworks Way into a public road which neither party would recommend because of the threat to public safety.

The proposal fails to consider how residents may be affected by living so close to late-night F&B providers, large events venues and railway lines. It introduces the creation of a large event space only thirty metres from an existing one (Carriageworks) and turns a busy pedestrian zone (Carriageworks Way) into a road.

The proposal is also disconnected from the redevelopment of South Eveleigh over the tracks rather than complimenting and learning from what is largely a success story. Historically, both precincts were the centre of NSW's railway industry. Instead, a distinctive precinct with a unique history will be broken into a series of development plots with only the vaguest unifying vision. This disconnect is further evident in the absence of any plan to create a footbridge connecting North and South Eveleigh – an essential ingredient in activating both sites.

Claims that Redfern North Eveleigh will be 'a connected centre for living, creativity and employment opportunities' within 'Tech Central' lack any detail – they are buzz phrases rather than a vision and doom a coherent government plan to failure. Redfern North Eveleigh must be developed holistically to preserve its unique heritage and contribute something distinctive to the landscape of Sydney.

# 4.3 INADEQUATE RESPECT FOR SITE HERITAGE

The intention to respect the unique industrial and Aboriginal heritage of the area is referred to throughout the project documents, but is compromised in the detail.

### i. The buildings

Architecturally, both Carriageworks and the Paint Shop Building will be diminished and overshadowed by the tall buildings next to them. Part of the Paint Shop Building will be demolished while permission is granted to add a modern extension on top. When we respect our heritage sites, we grant them space; we preserve their unique atmosphere rather than building on top of them.

# ii. The sub-precinct as a whole

Heritage goes beyond the preservation of buildings. It is also about the landscape and context in which those buildings sit. For many millennia, the Paint Shop sub-precinct was undeveloped Aboriginal land and then, more recently, an open site of industrial activity. The construction of ten and even twenty-plus storey buildings will render the land unrecognisable from those previous uses. In this context, the preservation, such as it is, of industrial buildings becomes an alienating reminder of how far the redevelopment has taken the site from its original use.

We suggest Transport for NSW takes inspiration from Wynyard Quarter Innovation Precinct in Auckland and Digbeth in Birmingham, UK: two successful redevelopment projects which preserve the low-rise, industrial heritage of the land they are built upon.

#### iii. Ownership of the land

Redfern North Eveleigh is public land, cared for and managed by the Gadigal people for millennia before being utilised by the state for industrial purposes. For the first time, much of this land will be put into private ownership. Visitors to the site will have little stake in its evolution. Proposed public spaces are not even protected in the planning controls which refer simply to 'mixed use zoning'. The potential for mission-creep is considerable.

We believe that sensitive redevelopment will honour the open, low-rise spirit of the place, restoring public green space and fostering attitudes of care and creativity towards it.

# 4.4 INADEQUATE ENGAGEMENT WITH FIRST NATIONS COMMUNITIES

Core principles for the redevelopment of the site include 'a place for Aboriginal people' and 'inclusion'8.

These are important pledges: the gentrification of Redfern over the last fifty years displaced the First Nations communities that lived there for generations. Creating civic spaces where those communities can feel at home, where First Nations people can live and their communities and businesses flourish, is critical and requires First Nations leadership and decision-making at the core.

The Connecting with Country Framework is an excellent document that highlights the shortcomings already evident in the redevelopment plans. 'Despite the resonance Country can bring to the whole of design, it is still more common to see Aboriginal elements integrated into precincts as art installations or in Aboriginal-influenced landscape design than in built form.'9 This frequently results in 'the shallow solution of installing Aboriginal artwork that is unrelated to a place in a completed project or the 'exploratory' approach (still the most common on public projects) of "provide us with your stories and images, and we'll bring you what we've done for approval".'10

According to the report, most urban redevelopment emerges through a Western lens. Western philosophies have shaped Country to their own ideologies and understandings of nature.' High-rise buildings, the privatisation of public land and the fussy over-curation of that land into walkways, pavilions and urban plazas are all consequences of these Western philosophies.

The Connecting With Country Framework instead calls for a 'co-design intention that is based on deep engagement with Aboriginal stakeholders and community-endorsed creative

<sup>&</sup>lt;sup>8</sup> The Redfern North Eveleigh Strategic Vision, April 2022

<sup>&</sup>lt;sup>9</sup> Connecting with Country Framework, June 2022

<sup>&</sup>lt;sup>10</sup> Ibid.

practitioners local to place'11. 'Intention' refers to both conception and evolution, rather than presenting an advanced masterplan for comment.

Engagement with First Nations communities needs to be respectful of the errors of urban management that impacted Redfern's once thriving First Nations community. Most importantly, it means conversing without prejudice on basic principles of what the precinct should be used for.

We therefore agree with the Design Panel Review's comments that engagement with Balarinji came too late. <sup>12</sup> We urge Transport for NSW to address this concern by going back to first principles.

### 4.5. CONFUSED 'MIXED-USE' ZONING PROPOSAL

The interpretation of 'mixed use' zoning throughout the sub-precinct undermines the ambition to create public spaces, civic distinctiveness and will result in mission-creep and unnecessary tension between future tenants.

This is already evident in the current proposal. A modern building is stuck on top of a heritage site (Paint Shop Building), an area which will be dominated by goods and services lorries is presented as 'public space' (Traverser 1), while residents are expected to live besides noisy events and F&B venues. Promises to create public parks are not guaranteed by mixed-use zoning.

The proposal precludes a distinctive and coherent vision for Redfern North Eveleigh and its unique history. It fills the sub-precinct with more high-rise office space, which is already well-provided for in the city centre and Tech Central. Yet once it is done it is impossible to go back: the special potential and atmosphere of the site will be lost.

'Mixed use' zoning is a valid term, but all too often it is a fig-leaf to provide developers with enough wriggle room to do whatever drives the highest profit rather than supporting the distinctiveness of our city. North Eveleigh is a significant heritage site and deserves better.

# 4.6 INADEQUATE PROVISION OF SPECIFICALLY GREEN SPACES

Sydney's inner west is heavily urbanised. For the most part, green spaces are small, like South Eveleigh's Rotary Park and Eveleigh Green, but treasured nonetheless.

The plan for North Eveleigh acknowledges the need for public 'open' space, but achieves a claim of 12,550 square metres by accumulating the space offered by walkways and Traverser No 1, which will inevitably continue to be used as goods and services parking for both Carriageworks and the Paint Shop Building. The public square is welcome, but concrete rather than green space. The Eastern Park is small and awkwardly shaped because it needs

<sup>&</sup>lt;sup>11</sup> Connecting with Country Framework, June 2022

<sup>&</sup>lt;sup>12</sup> Consultation Outcomes Report, July 2022

to fit around the Chief Mechanical Engineer's Building and the Science Lab Building. None of these spaces are conducive to team games, picnics and play.

Finally, the public open space is not protected in the proposed planning controls which refer to 'mixed use zoning' only. We recommend the commitment to parkland is included in the planning controls. We also suggest that inspiration is taken from the recent redevelopment of Kings Cross Central in London, which rewilded industrial land to create a nature reserve. These green spaces should be conceived and designed from the outset with First Nations communities.

### 4.7 INADEQUATE LEVEL OF AFFORDABLE AND SOCIAL HOUSING

Minister Stokes launched the exhibition announcing a 'historic target of 30 per cent diverse housing, half of which must be social and affordable housing' 13, yet this target is not mentioned in the one thousand plus pages of documentation within the exhibition.

Central Sydney has a chronic need for both social and affordable housing. Gentrification has pushed many communities, particularly First Nations, out of the city centre. There is nothing historic about the published target. 15% affordable housing does not include social housing and therefore remains below City of Sydney's targets (7.5% social and 7.5% affordable). This is particularly important if Transport for NSW is in earnest about creating 'a place for Aboriginal people' and 'inclusion' more broadly.

The lack of cohesion between public statements about the redevelopment and the proposal itself points to further failure in planning considerations.

# 4.8 NEGATIVE IMPACT ON CARRIAGEWORKS' MISSION AND OPERATIONS

i. Vehicular access route through the central spine of the Carriageworks Precinct Existing plans show that Carriageworks Way (the outside concourse running through the Carriageworks sub-precinct) will join a 'primary road network as a two-way system and expressed as traditional road with kerbs'<sup>15</sup>. Carriageworks objects strongly to this possibility as both impractical and detrimental to its activity. The Farmers Market hosts an average of four thousand people every Saturday, while large, regular cultural and commercial events can see the precinct hosting up to ten thousand people on peak days. It is evidently not safe to have a public road running through these events.

Outside of peak time, Carriageworks Way acts as a private goods and services road. Service traffic will only increase once the Paint Shop Building is active. Combining a public road with goods and services will result in long tailbacks and an additional safety risk. We urge Transport for NSW to retain Carriageworks Way as goods and services access only.

<sup>&</sup>lt;sup>13</sup> Redfern on track for renewal, 26 Jul 2022, by Minister for Infrastructure, Cities, Active Transport

<sup>&</sup>lt;sup>14</sup> Sustainable Sydney 2030-50 Continuing the Vision

<sup>&</sup>lt;sup>15</sup> Paint Shop Rezoning – Presentation to Carriageworks, 29 July 2022

ii. Overshadowing by Blocks E1, E2, H and the K1 Extension Zone
Plans for blocks E1, E2, H and the K1 Extension Zone<sup>16</sup>, which allow a maximum height in
places of RL63.6m, threaten to significantly overshadow Carriageworks, blocking light and
crowding an important heritage site. We propose a reduced height limit in the Sub-Precinct
to avoid diminishing the heritage value of both Carriageworks and the Paint Shop Building.

# iii. Transport and Connectivity

The parking provision within the current proposals is disproportionate to the dramatic increase in visitors the site will receive. Parking will become harder for visitors to Carriageworks. While we endorse the emphasis on environmental sustainability, one solution is to provide infrastructure to support electric cars (due to soar over the next decade) rather than insubstantial parking.

We urge Transport for NSW to increase parking provision within the precinct as a whole. Now is also the moment to build a bridge connecting North and South Eveleigh, which would seem essential to delivering the vision of Tech Central. Finally, there are no plans in the current exhibition to create a bus route along Wilson Street, which would be of immense benefit to both Carriageworks and the precinct in general.

# 5) BUILDING THE VISION: NORTH EVELEIGH CREATIVE QUARTER

Throughout its history, North Eveleigh has been a site of making – whether the stories and cultural practices of First Nations peoples or the trains and rail-tracks of the industrial era. The emphasis on the Paint Shop sub-precinct as a hub for innovation and technology within the wider context of Tech Central is an opportunity to connect with this past.

'Tech' is a broad and ambiguous term, especially in the digital age when most companies are involved with tech to some degree. The sort of office space required by white-collar data and marketing companies is amply provided in other areas of Tech Central, like South Eveleigh. Yet one of the three priorities for the Tech Central vision is space for the Creative Industries, which have little need for high-rise offices.<sup>17</sup>

While many 'big data' organisations have moved into South Eveleigh, we believe North Eveleigh, building on the presence of Carriageworks, has the opportunity to become a site for the creative industries – in particular, domestic film, television and digital production (including augmented reality and gaming), but also artist studios and rehearsal space for the performing arts. Ever since the sale of Fox Studios to Disney in 2019, Sydney lacks studio space for these industries. As a consequence, NSW is losing production – and everything that comes with it (jobs, revenue, hospitality) – to Queensland, Victoria, South Australia and overseas. This is an opportunity to reclaim it.

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<sup>&</sup>lt;sup>16</sup> DRAFT Paint Shop Sub-Precinct Design Guide, July 2022

<sup>&</sup>lt;sup>17</sup> NSW Government Tech Central website

These facilities would also create opportunities for students at Sydney University and UTS. By working closely with the faculties, they will support education and the syllabus, as well as offering career pathways for new entrants to the screen sector.

Refocusing the vision on the Creative Industries element in Tech Central will give the proposal greater distinctiveness. It will impact the type of spaces that are built, requiring self-contained low-rise buildings rather than tall office towers. It will be true to the heritage of the site by putting an emphasis on making rather than office work. It will also help deliver the City of Sydney's target to create 40,000 square metres of cultural production floor space to replace what has been lost<sup>18</sup>. At the heart of it will be the Paint Shop Building itself, which even in its current state is already used on occasion for film and television productions.

Inspirations for a North Eveleigh Creative Quarter include:

- Lot Fourteen in Adelaide, currently in progress on the site of the old Royal Adelaide Hospital. It includes Tarrkarri (the Aboriginal Arts and Cultures Centre). The heritage buildings have been preserved.
- Wynyard Quarter Innovation Precinct in Auckland. This low-rise campus has a singular vision driven by the architects who led the master planning and architectural design. It preserves the low-rise heritage of the site.
- Kings Cross Central in London. Like Redfern North Eveleigh, Kings Cross Central was
  a site of railway industry. The redevelopment respects the heritage of the area,
  providing a home for Central St Martins and creating three new parks, including a
  nature reserve.
- Digbeth in Birmingham. The old industrial quarter is now the city's creative quarter, with start-ups and artist spaces. It is protected by conservation laws, forbidding the construction of any high-rises, which preserves its original character.

We believe the Paint Shop sub-precinct could and should become Sydney's new Creative Quarter, with additional green space and social and affordable housing. This will preserve the site heritage which is severely compromised by the high-rise towers in the current plan.

# 6) ROLE OF CARRIAGEWORKS IN REDEVELOPMENT

Carriageworks does not object to the need to redevelop both the Paint Shop sub-precinct and the Clothing Store sub-precinct. Our objections concern the way that redevelopment is currently imagined and the restraint the planning proposals will impose on a more ambitious vision. We believe Carriageworks has a central role to play in shaping and delivering the right plan.

Carriageworks is the cultural heart of the Redfern North Eveleigh Precinct and the bridge connecting the other two sub-precincts. In any redevelopment plan, our aim is to facilitate a seamless integration of civic experience — one precinct rather than three sub-precincts - and deliver the cultural and creative mission. We also want to ensure that NSW Government's investment in our work is not undermined, as it is by the current proposal.

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<sup>&</sup>lt;sup>18</sup> Sustainable Sydney 2030-50 Continuing the Vision

There are six elements to our offer:

# 6.1 CARRIAGEWORKS MUST JOIN THE REDFERN NORTH EVELEIGH PRECINCT STEERING AND DESIGN COMMITTEES

Carriageworks is an integral part of North and South Eveleigh. Through the creation of the Farmer's Market, the commissioning of art works outside our building, and our engagement programme, we play a vital role in activating and unifying the site. We understand the ways it connects with our surrounding communities better than anyone. Our pivotal location, connecting the Paint Shop and Clothing Store sub-precincts, means that Transport for NSW's vision for the precinct can only succeed if Carriageworks is closely involved at every stage.

Our mission is not only to make Carriageworks a significant cultural destination but support the successful redevelopment of the precinct as a whole and support our local communities. In order to deliver this mission effectively, and accountably, we believe Carriageworks should be central to the redevelopment, with a particular remit around the masterplan, site design and ongoing public art programs.

### 6.2 CARRIAGEWORKS MUST DELIVER THE PUBLIC ART PROGRAMS

There is overwhelming logic in Carriageworks taking responsibility for delivering the Public Art Programme that will be an important feature of any redevelopment plan. We are the largest cultural provider in the area and have proven experience in delivering cultural excellence, both on our own site and for South Eveleigh too.

One advantage of this approach is that it ensures the public art programmes of the Paint Shop sub-precinct and Carriageworks complement one another: offering a rich variety of cultural experiences, serving the full breadth of audiences and communities, avoiding duplication and creating cohesion. As a major partner of the Sydney Festival, VIVID and other festivals, Carriageworks can co-ordinate a precinct-wide programme that will make Redfern North Eveleigh a central fixture in Sydney's cultural calendar.

There are three main elements to the Public Art Programme.

i. Commissioning and delivery of both permanent and temporary art works in the fabric of the precinct.

Carriageworks understands the role of art in place-making. We commissioned the iconic artworks on the Carriageworks sub-precinct (like Reko Rennie's iconic *REMEMBER ME*) and those in the South Eveleigh precinct. Many of these artworks emerged through Carriageworks' committed and collaborative relationships with First Nations artists and our proposal is to continue to benefit from these networks in leading the Public Art Programme for the Paint Shop sub-precinct.

ii. Managing events, festivals and the art programme of the precinct
As a programmer of both intimate and epic performance and events, Carriageworks is ideally placed to expand that programme into the Paint Shop sub-precinct, ensuring it is coordinated, rooted in inclusivity and excellence, and takes advantage of our relationships with the city's major cultural providers. We therefore welcome and endorse the conclusion of the precinct's current Public Art Strategy: 'The Precinct has a strong cultural identity and reputation, with Carriageworks being a major cultural centrepiece for Sydney. The performing arts will continue to have a home at the precinct, and are likely to expand outwards from Carriageworks. This would include: live music, street bands, outdoor dance performance and events; speaking, poetry and writing events; and theatre.'19

# iii. Education and Adult Learning

The significant increase in residents will require an education and adult learning program to match. Such programs are already part of our remit. For instance, the Solid Ground program, which supports artists and First Nations young people, has partnered with Alexandria Park Community School since 2016. We propose that Carriageworks takes an enhanced role managing the creative education and learning program across the precinct as a whole, using its own as well as newly-developed spaces for this purpose.

We will deliver a ground-breaking and impactful public art programme for North Eveleigh. In order to achieve this, we will require management of any budget put aside for cultural and learning provision.

# 6.3 CARRIAGEWORKS MUST MANAGE EVENTS SPACES IN THE PAINT SHOP BUILDING

The current Design Guide calls for 'spaces for creative and cultural uses, including but not limited to media, advertising, fine arts and craft, design, film and television, music, publishing, performing arts, cultural heritage institutions, community.<sup>20'</sup> The Paint Shop Building is a crucial space for delivering this ambition. It is already popular for film shoots and with additional infrastructure will join Carriageworks as a desirable location for cultural events and festivals.

Because of both its remit and geography, Carriageworks is better placed than anyone to manage this programme of (mostly cultural) events and dry hires. There is also a logistical and public safety benefit to this. The available parking space on Traverse 1 for loading and unloading equipment is extremely limited – and remains so in the current redevelopment plan. If the scheduling of large-scale events at both buildings is not co-ordinated, bottlenecking will occur on Carriageworks Way and Traverser 1, presenting a safety risk to the public. It will not work to have two independent events and location providers operating thirty metres from one another.

We believe that, together, Carriageworks and the Paint Shop Building could be the heart, but far from the outer limits, of a new and distinctive Creative Quarter for Sydney, with a

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<sup>&</sup>lt;sup>19</sup> Redfern North Eveleigh Precinct Redevelopment Project Public Art Strategy, June 2022

<sup>&</sup>lt;sup>20</sup> DRAFT Paint Shop Sub-Precinct Design Guide, July 2022

particular focus on the screen sector. As part of this management service, Carriageworks would continue to use the Clothing Store as a facility to support artist residencies, rehearsal, pop-up maker spaces and storage for events in both buildings.

# 6.4 A BASE FOR FIRST NATIONS ARTISTS AND COMMUNITIES TO ENGAGE WITH THE REDEVELOPMENT

The Connecting with Country Framework calls for a 'co-design intention that is based on deep engagement with Aboriginal stakeholders and community-endorsed creative practitioners local to place'<sup>21</sup>. This process needs to be managed generously and effectively. Carriageworks can use its networks into First Nations communities and its building to support this work. With additional resource from the developers, Carriageworks can also provide short and medium-term office and maker spaces for First Nations creatives and entrepreneurs.

### **6.5 ARTIST AND CREATIVE MAKER SPACES**

Through gentrification, the availability of inner-city creative spaces has dwindled. The redevelopment of the North Eveleigh Precinct is a unique opportunity to expand working spaces for artists, creative makers and cultural practitioners, enhancing the cultural vibrancy of our city. These spaces would build on the success of Carriageworks Clothing Store Artist Studio programs, which provide affordable working space to creative practitioners and connects their processes and work with local communities.

These creative spaces would be central to the delivery of a sustainable and successful cultural sector within New South Wales. They would help drive the vision of a creative quarter and compliment the large-scale digital studio provision, enabling career pathways between the independent and commercial sectors. They would also preserve the low-rise maker spirit of the precinct. Carriageworks would necessarily manage these spaces.

# 6.6 ARTIST, PERFORMER AND CULTURAL WORKER HOUSING

The North Eveleigh Precinct should include temporary short-term accommodation facilities for artists, performers and cultural workers. These facilities will support the programs of Carriageworks and its resident companies, local community organisations and partners such as Sydney Festival. This provision — a small percentage of the overall housing volume — will drive the cultural sustainability of the precinct and contribute to a dynamic and creative environment for all precinct residents, workers and visitors.

Carriageworks, partner organisations and First Nations community representatives should be involved in the design of such accommodation, ensuring its suitability for a range of individuals and communal guest groups onsite. Carriageworks should manage the facility.

<sup>&</sup>lt;sup>21</sup> Connecting with Country Framework, June 2022

# 7) CONCLUSION

Urban redevelopment is a fraught process: fingers get pointed, names are called, sides are taken. None of this is helpful. For the most part, we all try to do good within the frameworks given to us.

We began our submission within an Acknowledgement of Country, and we want to end with an acknowledgment of good will. We know that Transport for NSW developed the current proposal with a genuine desire to improve this city and create new opportunities.

While we believe the proposal falls far short of achieving these aims, we suspect it is because the wrong frameworks were in place. Most important is the relative isolation in which the masterplan was created. Consultation did occur, but so late in the process that a tone of defensiveness grew around it. The short window for submissions is a case in point: for most individuals and organisations a month is hardly ample to process a thousand plus pages of documentation, suggesting that anything but headline comments are not hugely welcome.

We believe that something extraordinary can be done with Redfern North Eveleigh, and should be done soon. By taking a few steps back and rooting the redevelopment work (including the masterplan itself) in consultation with local communities and stakeholders, and by envisioning a Creative Quarter rather than replicating the offer at Central and South Eveleigh, the project team has an opportunity to leave their mark on the continuing success of Sydney as a world city. Carriageworks is eager to take its natural place as an engaged and supportive partner in that process.

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 3:09 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 15:08

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Harrison

#### Last name

Werlemann-Godfrey

I would like my submission to remain confidential

Νo

# Info

#### **Email**

# Suburb/Town & Postcode

2008

# Please provide your view on the project

I object to it

### Submission

I object to the proposal for mixed-use zoning in the Paint Shop sub-precinct. I also express deep concern over the manner in which this proposal has been put forward to the community.

The proposal for mixed-use zoning provides no guarantee that the plans on exhibition to the public will be adhered to. This means that the needs of the local community can be disregarded at the will of the developer, and the local's amenity could be greatly affected. Of particular concern is the fact that this will allow developers to build on the entirety of the site with no meaningful quality green-space or public space.

I would also like to voice the following objections in relation to the rezoning proposal:

-The plans will damage the heritage significance of the site

Wilson St is a historic Victorian streetscape, the plans make no provisions to enhance its surroundings.

- -There is a lack of social and affordable housing, as the proposal only has a minimum target of just 15% of the residential component compared to the City's minimum of 25%
- -There is no commitment to provide for culturally appropriate Aboriginal and Torres Strait Islander affordable housing
- -There will be noise and vibration impacts on future residents of the site, as homes will be located next to the rail line
- -There will be a significant increase in bulk and scale of the development, which is 67% more

than what was originally proposed in 2008

- -There is no appropriate plans for the preservation of the cultural heritage of the area- including existing public art (i.e. skippy girls).
- There is a failure to create flexible and diverse spaces that would suit its planned use as an innovation and creative hub
- -No realistic consideration of Traffic impacts, and no pedestrian connectivity between North and South Eveleigh
- -Quality and functionality of the public open space.

There are a planned 6000 extra residents and no adequate plans for public infrastructure to accommodate them. This will put further pressure on already struggling parks, schools, roadsetc.

The proposal allows for development that is simply too large for the area.

I believe that the one month exhibition period and the format through which this proposal has been put to the community is fundamentally lacking and undemocratic. The community requires time to consider the plans, and those that have been provided do more to obfuscate than to elucidate. The plans seem to have been 'sold' to the community through artistic impressions and 'concept' models. The Transport for NSW website is confusing and information is overly technical and presents a genuine accessibility issue for the community. We have not been provided with any documents that clearly and concisely inform us of the implications of the rezoning proposal.

This to me feels like an underhanded attempt to push through a plan and limit public scrutiny.

I call for Transport for NSW and/or the relevant NSW government bodies more broadly to extend the time-frame for exhibition. Further, I call on them to reconsider plans that have local council support, I refer TfNSW to the City of Syndey Council.

I agree to the above statement Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:56 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 22:55

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Adrian

# Last name

**Bennett** 

# I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2008

# Please provide your view on the project

I object to it

### **Submission**

I am supporting the City of Sydney counter proposals, with increased levels of social and Aboriginal housing in particular.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:51 PM

To: DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:50

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

First name

Thea

Last name

Eyles

I would like my submission to remain confidential

No

# Info

#### **Email**

Suburb/Town & Postcode

Redfern 2016

# Please provide your view on the project

I object to it

### **Submission**

I believe that all public lands should remain in public ownership and that new housing on public lands must be affordable or public and social. Across our city we're seeing the unrelenting transfer of public land and assets to private ownership. The short term gain does not outweigh the loss of land and assets that we'll never get back. Public land should be used to support the public needs and not private developers. Don't miss an opportunity to build much needed affordable rental accommodation.

I understand from the draft master plan that the new buildings being proposed are too tall (28 stories). This will have a detrimental impact on the important heritage buildings on the site eg the Paint Shop, Chief Mechanical Engineer's Building. These buildings need to be preserved and maintained. 28 storey towers will not fit the character and charm of the existing buildings in the surrounding area. Do not build on the top of the paint shop.

I understand from the draft master plan that floor space will be increased in this heritage precinct. The area does not need increased traffic movements which will result (currently it is very hard to enter City Road from this side, and also Gibbons Street across the railway bridge).

I do not understand from the draft master plan what constitutes 'community spaces'. This area needs more certainty for open spaces that can be used for public recreation.

I do not understand from the draft master plan how this re-zoning will deliver any outcomes for First Nations peoples. Any plan needs to ensure dedicated Aboriginal Housing is included.

The communities who live in the area support connectivity across the area. A bridge must be incorporated into any planning proposal to link South Eveleigh to North Eveleigh.

Thea Eyles
Redfern, NSW, 2016
25 August 2022

I agree to the above statement Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:51 PM

To: DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:50

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

First name

Thea

Last name

Eyles

I would like my submission to remain confidential

No

# Info

#### **Email**

Suburb/Town & Postcode

Redfern 2016

# Please provide your view on the project

I object to it

### **Submission**

I believe that all public lands should remain in public ownership and that new housing on public lands must be affordable or public and social. Across our city we're seeing the unrelenting transfer of public land and assets to private ownership. The short term gain does not outweigh the loss of land and assets that we'll never get back. Public land should be used to support the public needs and not private developers. Don't miss an opportunity to build much needed affordable rental accommodation.

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I do not understand from the draft master plan what constitutes 'community spaces'. This area needs more certainty for open spaces that can be used for public recreation.

I do not understand from the draft master plan how this re-zoning will deliver any outcomes for First Nations peoples. Any plan needs to ensure dedicated Aboriginal Housing is included.

The communities who live in the area support connectivity across the area. A bridge must be incorporated into any planning proposal to link South Eveleigh to North Eveleigh.

Thea Eyles
Redfern, NSW, 2016
25 August 2022

I agree to the above statement Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:49 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:49

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

#### First name

Nina

#### Last name

Та

#### I would like my submission to remain confidential

No

# Info

#### **Email**

### Suburb/Town & Postcode

Newtown 2042

# Please provide your view on the project

I object to it

### **Submission**

As a resident of Wilson St, Newtown, where the Paint Shop is located, I'm concerned about the likeability of the area if the plans are approved.

I object to the plans for the following reasons:

- 1. Traffic impacts and no pedestrian connectivity between North and South Eveleigh.
- 2. Quality and functionality of the public open space.
- 3. Undermining the heritage significance of the site by building over large areas of the Paint Shop.
- 4. Locating the residential aspects of the development near the train line which impacts the quality of life of the residents with the train noise..
- 5. The height of the multi story towers will dwarf the surrounding areas where heritage terrace houses are being maintained.

#### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 12:10 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 12:09

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

First name

Penelope

Last name

Harvey

I would like my submission to remain confidential

Νo

# Info

#### **Email**

# Suburb/Town & Postcode

Darlington 2008

# Please provide your view on the project

I object to it

### **Submission**

The proposed towers are too high for the local area. They should be reduced to fit in better with the historical and heritage significance of the site. This is the place where the railway system of NSW (and perhaps even the whole of Australia) was designed and built - it deserves to be preserved and commemorated. In particular the Paint Shop and Chief Mechanical Engineer's Building should feature and not be overwhelmed by having 28 storey building near them.

The proposed housing mix is not good enough. There needs to be a provision for social housing as well as affordable housing. There also needs to be provision for dedicated aboriginal housing in the mix, so that aboriginal people are not priced out of an area where they have traditionally lived. I agree with the Sydney City Council proposal of a 25% minimum of social and affordable housing in the area.

Housing should be located away from the railway tracks to minimise noise and vibration.

The Mixed-Use zoning controls do not specify specific locations or land sizes for community use (ie parks and playgrounds). These things need to be specified so they are enforceable and cannot be changed by developers.. With so many proposed new residents to the area there need to be open spaces and parks in the area.

Further thought also needs to be given to site access because of the proposed increased population of the area. Has an analysis been done of the effect on the local area of the extra traffic? Will there be a bridge connection between north and south Eveleigh? If so, will this be for pedestrians only, or also be for cars? A pedestrian connection between north and south Eveleigh is a good

idea.

As for the commercial aspects of the plan - these seem to mainly involve high-rise office space. Consideration needs to be given to innovation-focused, researched-based enterprises, and not just traditional office space. Since the lock-downs it is unlikely that office work or the space in which it is done is ever going to be the same again.

I urge you to consider these points that I have raised before making any decisions.

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:47 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:46

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Sarah

#### Last name

Parker

### I would like my submission to remain confidential

Nο

# Info

#### **Email**

### Suburb/Town & Postcode

2016

# Please provide your view on the project

I object to it

### **Submission**

Absolutely back putting such a massive complex in a low built residential area.

Also will look ugly as

Ruin a lot of the light

Just not a fab idea you know, a massive apartment next to town houses.... yuck, maybe if there were a heap of other similar/built up apartments, just nah

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:35 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:34

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Richard

#### Last name

Donnelly

I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2016

# Please provide your view on the project

I object to it

### **Submission**

Hello,

The proposal for 15% of the residential component to comprise social and affordable housing falls short of the City of Sydney's 25% minimum. Similarly, for there to be no commitment to provide culturally appropriate Aboriginal and Torres Strait Islander affordable housing is unacceptable and does not align with the Redfern Waterloo Affordable Housing Campaign.

In addition, the size and height of the development is vastly different to what was initially proposed and with buildings up to 28 storeys high, is not in keeping with the overall aesthetic of the area.

Regards,

Richard Donnelly

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:48 PM

To: DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 22:48

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

**Emily** 

#### Last name

Long

I would like my submission to remain confidential

No

# Info

#### **Email**

### Suburb/Town & Postcode

Redfern 2016

### Please provide your view on the project

I object to it

### Submission

I object to the proposed rezoning proposal, particularly to the scale of the proposal.

The maximum building heights of the proposal are completely ridiculous. High rise buildings of up to 100m will loom over nearby terrace houses of only 2-3 storeys. Even though they are set back from Wilson st, their sheer height and bull will be completely imposing, ruining the streetscape, overshadowing and destroying the privacy of the Darlington houses and village area. The loss of sky view for Darlington cannot be overestimated- this is a peaceful village neighborhood at present and it's character will be destroyed by this absolutely appalling overdevelopment. Already we can see the impact that ugly overdevelopment has had on the Redfern neighbourhood around the train station, and this is not something that should be repeated! Huge towers looming over tiny terraces is NOT something to be aspired to and should be not be allowed in the future. Absolutely ugly, poor design and a blight on the skyline and neighbourhood.

I have concerns that the heritage of the buildings in the area is not being respected - any heritage buildings will be dwarfed and overshadowed. They should be featured, but instead the proposed obliterates them with surrounding overdevelopment.

The community and its needs are not being addressed by this overdevelopment and proposal. The community has been very clear that we want better links with the South Eveleigh precinct, cycleways and pedestrian bridges.. The South Eveleigh development is a rare example of a good development-building heights are reasonable, there is public open space and good design featured. This rezoning proposal contains none of these good features. There is simply not enough open and green space proposed for such a mammoth development!

I also am extremely upset that the consultation period has been so short, and that the community has not been given adequate opportunity to have a say.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:22 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:22

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

### First name

Katharine

#### Last name

Dabrowski

I would like my submission to remain confidential

No

# Info

#### **Email**

### Suburb/Town & Postcode

Darlington 2008

# Please provide your view on the project

I object to it

### **Submission**

It seems, talking around to the neighbourhood, that many residents and home owners are deeply distressed and completely astonished by the above proposal.

RATIO of allocated space.

The proposal which presents a design plan has no real provision for public space.

The towers allocated as office blocks are out of keeping with current trends wherein office blocks are remaining empty since Covid restrictions, since it has been revealed that productivity can be achieved just well on-line. Anyway the allocated area for the office blocks is three times the area of residential building.

Green space is pretty well ignored, as the ratio of building to green space is totally in favour of building structures. Where are the parks with public access? Where are the areas for community recreation?

OUT of Touch

The tower blocks in this design are hopelessly out of touch with the present and past character of the area in which average terrace house height is predominant.

The proposal is seen as a big blow to a part of our inner west which is actually famous for its unique character and attracts many visitors from other parts. It is not inner city Sydney and its ambience should be maintained in this spiri or at least taken into considerationt.

**INSENSITIVE to Existing Community** 

The community around this area is known for its natural integration, its tendency towards co-operation in local projects, a tolerant attitude. It is a real community, people watch out for each other.

SAFEGUARDS against Future Development are Lacking

People are acutely aware of environmental and social issues.
The projected development as it stands now will provoke huge opposition.
And there is no guarantee in this design that further development will be restricted in the future.
We object on these issues.

K and W Dabrowski.

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:19 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:19

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

# **Name**

### First name

Emma

#### Last name

Jones

# I would like my submission to remain confidential

Νo

# Info

### **Email**

# Suburb/Town & Postcode

Darlington

# Please provide your view on the project

I am just providing comments

### **Submission**

Attached is the submission on behalf of the Tech Central Alliance

### I agree to the above statement

25 August 2022

Submission via <a href="https://www.planningportal.nsw.gov.au/paintshop">https://www.planningportal.nsw.gov.au/paintshop</a>

Rob Sharp and Michael Cassel Secretary Secretary

Transport for NSW Department of Planning and Environment

Dear Secretaries,

# Re: Redfern North Eveleigh Paint Shop Sub-Precinct Rezoning Exhibition

I write on behalf of the Tech Central Alliance in response to the exhibition of the Redfern North Eveleigh Paint Shop Rezoning Proposal

The Alliance, comprising the long-term anchor institutions in the precinct (University of Sydney, UTS, Sydney Local Health District, City of Sydney, Inner West Council) has been working closely with the Greater Cities Commission for almost five years to progress the development of the precinct as Australia's most important innovation district.

As you are aware, we are keen to engage with TfNSW on a precinct-wide basis to deliver the Government's agenda to grow the knowledge economy and deliver jobs and economic growth for NSW and the nation. In that context, the Paint Shop Sub precinct represents an important "catalyst" opportunity in the positioning of the "Eveleigh Node" in the Tech Central ecosystem.

We noted in our submission to the Redfern North Eveleigh Strategic Vision, in March 2021, that Alliance members are keen to bring the broad range of research, educational and business activities underway in the precinct, to help inform the curation and development of the innovation ecosystem at Redfern North Eveleigh. International best practice highlights that successful innovation is closely aligned with the deep expertise and commitment of anchor institutions and their partners.

We are keen to work together to develop a "plan" for supporting and curating "future industries" growth at North Eveleigh, building on the placemaking, transport, pedestrian connectivity and affordable housing, principles set out in the rezoning proposal.

The Paint Shop sub-precinct can play an important catalyst role in fostering an environment which supports industries of the future to grow and develop. It also presents a unique opportunity to leverage the precinct's recognised creative strengths and its deep design knowledge with creative tech industry partners to build a creative design hub at North Eveleigh.

Alliance members are at the centre of growing industries of the future, and supporting the design and creative sector. We want to work with you to ensure that the critical facilitating infrastructure and programs for such initiatives are integrated into the urban renewal planning for this site.

We propose that TfNSW and the Alliance work together to develop a short and medium term "engagement plan" and an "action plan" to agree strategies and projects, which can form the basis of future project partnerships, to position the Paint Shop Sub-Precinct as a key destination for innovation investment and talent.

If you have any questions or require further information, please contact Debra Berkhout on

Yours sincerely, Greg Robinson

Chief University Infrastructure Officer, University of Sydney, On behalf of the Tech Central Alliance













From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 1:54 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 13:53

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Richard

#### Last name

**Plumpton** 

## I would like my submission to remain confidential

Nο

# Info

#### **Email**

# Suburb/Town & Postcode

Newtown, 2042

# Please provide your view on the project

I object to it

#### **Submission**

Whilst I am not in opposition to the proposal to redevelop the Paint Shop precinct in some way, I am in agreement with the City of Sydney's alternative proposal and believe this to be a much more considered and fair way to develop the area.

In particular, I believe the City of Sydney's proposal is a much better way to preserve the heritage value inherent in the site, whilst also including more vital affordable housing, minimising negative impacts on local communities and better supporting indigenous communities.

I would strongly support a full consideration of the City of Sydney's proposals as a much better way of redeveloping this site.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 1:48 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 13:48

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Maddie

#### Last name

Parker

I would like my submission to remain confidential

Νo

# Info

#### **Email**

## Suburb/Town & Postcode

Redfern 2016

# Please provide your view on the project

I object to it

#### **Submission**

While in principle I support the development of this under-utilised space, I have several major objections.

I don't think the proposal includes enough social and affordable housing and as such risks contributing to the massive ongoing gentrification of the area, pushing out long-term low SES residents, especially Redfern's Indigenous community. The proposal should include a commitment to provide housing for Aboriginal and Torres Strait Island people in the area.

I think that the proposed development is not of an appropriate scale for the area - it's much too high and as such will dramatically change the character of the area.

I don't think the proposal reflects residents' desire for green space; I would like to see significantly more public space included in the proposal, to boost neighbourhood community, health and well-being.

Madeline

Resident of Redfern

## I agree to the above statement



From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 1:46 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal chia-nsw-submission-on-paint-shop-sub-precinct-rezoning-proposal.pdf

Submitted on Thu, 25/08/2022 - 11:36

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am submitting on behalf of my organisation

# **Name**

#### First name

Michael

#### Last name

Carnuccio

## I would like my submission to remain confidential

No

# Info

## **Email**

# Suburb/Town & Postcode

2016

#### **Submission file**

chia-nsw-submission-on-paint-shop-sub-precinct-rezoning-proposal.pdf

#### **Submission**

Please refer to the attached submission from the Community Housing Industry Association NSW.

# I agree to the above statement



Attention of: NSW Department of Planning and Environment Via online submission form

## **Submission: Paint Shop sub-precinct rezoning proposal**

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide a submission on the rezoning proposal for the Redfern North Eveleigh Paint Shop sub-precinct.

CHIA NSW is the industry peak body representing registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 54,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Since 2012, CHPs have delivered more than 5,300 new homes across NSW, representing an investment of over \$1.8 billion. Critically, these are new homes that the private sector cannot – or will not – deliver in response to housing need.

More than 50,000 applicants are currently waiting for social housing in NSW. This includes 3,500 applicants within the City of Sydney and adjoining suburbs, which have some of the highest housing costs in Australia. Therefore, increasing the amount of housing available to lower income households is an urgent priority. Without significant investment in more affordable homes, some people will be left waiting for 10 years or more to be housed, forcing them to pay unaffordable rents, live in substandard housing, or, at worst, become homeless.

In this regard, CHIA NSW welcomes the inclusion in the rezoning proposal of an affordable rental housing target. Such an approach will provide certainty to stakeholders and the community and support the establishment of a successful innovation precinct.

However the proposed target, equivalent to 15% of residential floorspace, is relatively modest compared to the acute and growing need that exists in the area, as evidenced in the Social Infrastructure Study that accompanies the rezoning proposal. CHIA NSW's strong view is that a higher proportion of social and affordable housing can and must be delivered in the precinct. In this regard we note that the City of Sydney's Local Strategic Planning Statement seeks the provision of at least 25% of floorspace as affordable rental housing in perpetuity on all NSW Government sites.

The precinct, being a large scale Government owned site, presents a real opportunity to maximise the delivery of social and affordable housing. This is consistent with Strategy 11.2 of the Greater Sydney Region Plan, which requires State agencies disposing or developing surplus land to include, where viable, a range of initiatives to address housing diversity and affordable rental housing. CHIA NSW notes that the 5%-10% rate outlined in the Greater Sydney Region Plan is an indicative benchmark in the context of privately owned land. It should not be used to limit provision on government-owned land, where higher targets are viable.

CHIA NSW recommends that the rezoning proposal is amended as follows:

- Include an affordable housing requirement equivalent to at least 25% of total floorspace across
  the precinct. Such an approach will ensure a consistent amount of affordable housing is
  delivered on the site, even if the land use mix changes over time. The non-residential uses
  envisaged for the precinct, including retail, hospitality, cultural and creative uses, will likely
  generate low-income jobs that would benefit from access to affordable accommodation.
- To provide certainty, affordable housing requirements need to be included in the site-specific LEP provision for the precinct. This provision should include the option for affordable housing requirements to be met through either in-kind or monetary contribution. The suitability of inkind dedications need to be assessed from an operational perspective, including management and maintenance costs.
- The Design Guide be amended to include a requirement that any affordable housing delivered is managed and owned by a registered community housing provider. Such an approach will reduce ongoing costs to Council and maximises the impact of government investment by providing CHPs with additional capital they can leverage to deliver additional homes in the local area. The dedication of contributions to CHPs can be subject to appropriate controls to ensure the affordable housing is retained long-term.
- Where on-site provision as part of mixed-tenure development is considered suitable, early
  engagement with a CHP is essential to ensure the needs of future tenants are accounted for,
  operational costs are reasonable, and to consider management and maintenance arrangements.
- CHIA NSW supports the Design Guide requirement that new development explore opportunities for a diverse range of housing types. This needs to include exploration of opportunities for innovative housing models such as youth foyers.

CHIA NSW appreciates the opportunity to provide feedback on the Paint Shop sub-precinct rezoning proposal. We would be happy to discuss any of the recommendations further with the DPE.

Kind regards,

Michael Carnuccio
Senior Policy Officer

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 1:37 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** 2022-08-25-version-a-submission[239961].pdf

Submitted on Thu, 25/08/2022 - 13:34

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# Name

#### First name

Charles

#### Last name

Geddes

I would like my submission to remain confidential

No

# Info

## **Email**

# Suburb/Town & Postcode

Darlington 2008

# Please provide your view on the project

I object to it

# Submission file

2022-08-25-version-a-submission[239961].pdf

#### **Submission**

Hello

Please see attached my letter of objection to the proposed development.

Regards

Charles Geddes

Mobile:

#### I agree to the above statement



## **Summary of Concerns**

# Impact on the structural integrity of Wilson Street

The excavation required to provide car parking levels and foundations supporting multiple buildings of heights up to 128metres in close proximity to our property will potentially cause significant movement and vibration which could result in cracking and significant damage to our building.

## Inappropriate height of proposed buildings

Current building heights on Wilson Street are no more than 12 meters and the current proposal allows for building heights of up to 58.2 meters on Wilson Street and 128.8 meters behind Wilson Street. This proposed excessive construction height does not align with the heritage of the area and recent nearby development and the monstrous glass towers will dwarf all existing properties and overpower the neighbourhood. There will be a building on the western side of Wilson St that will be able to build up to the boundary line with a height of 44.5m, and a full-height of 58.2m

# Building and street setback against Wilson St

The proposed design guidelines do not meet the requirements of building separation and setbacks for multi-storey developments and will result in a loss of privacy and security to residents if allowed to proceed without mandated setbacks from our building.

# Shared road directly behind Wilson Street

The current proposal shows a road without any setback directly abutting the rear of Wilson Street. This will result in noise from vehicles & pedestrians at extremely close proximity to residents' apartments. The expectation is that there will be around 700+ residents and 6000+ workers in this area each day, and the road behind Wilson st will be a main road in the development. Adequate setback needs to be provided to protect residents' privacy and act as a buffer to vehicular noise.

## Solar impact of the development on Wilson Street

The proposal shows buildings between 58.2 and 128.8 meters surrounding Wilson Street. Our south facing apartments will have most, if not all, natural light blocked by such high buildings and the proposed buildings will cast a shadow over the entire property. Building height and separation needs to be reconsidered so that Wilson St receives adequate sunlight.

## Radiant Heat impact on Wilson Street from buildings F, K2 and L1

The rezoning proposal has north facing glass towers up to 128.8 meters. The glass buildings in close proximity will reflect and deflect radiant heat onto surrounding properties. This will result in heat being trapped on our rooftop and at street level, which will impact temperatures in our building for residents.

Active Street Frontages on precinct and impact on Wilson Street

There are currently no setbacks on the proposed retail and hospitality venues in the

proposed buildings immediately behind and next to Wilson St. Again this will have a significant impact on noise levels and privacy for our residents. These venues will also be able to trade late-nights and have outdoor spaces directly opposite our building.

## Precinct Entrance at Sheperd St, Ivy Lane and Little Eveleigh Street

The main entry and exit points to the new precinct will create a major safety hazard as they will be crossing busy pedestrian and bicycle pathways. A significant increase in traffic due to the large scale of development is expected and will clog our quiet residential street as well as potentially jeopardising the safety of the many pedestrians and cyclists who commute along our street.

Inadequacy of traffic and noise studies undertaken - wrong area of Wilson St Appropriate traffic studies were not undertaken. It has been forecast that after construction has been completed there will be over 700 new residents and 6000 workers in the new 24 hour precinct and the increased volume of cars and trucks on our streets at all hours of the day and night is unacceptable.

#### **Noise Pollution**

The broad re-zoning proposal is for a mixed use 24/7 precinct with the option to have outdoor space used for commercial purposes. This will have a considerable impact in the long term with the area potentially having hospitality venues operating in close proximity to our building. The area should not be re-zoned for mixed use so close to our apartment building in a residential area at the proposed density.

# **Light Pollution**

No impact assessment has been undertaken to determine the significant amount of light pollution that will emanate from the tall glass office towers situated immediately behind our building, which will have lights on at night. This will have a significant impact on our south facing apartments with light potentially penetrating their living rooms and bedrooms all night.

# Inadequate provision of housing suitable for multi-person homes including families (Apartment Mix)

The design guidelines refer to 'diverse' housing, which would leave a developer to interpret the type of housing they provide as anything they choose (e.g. student housing) which is unsatisfactory and may not meet community expectations or the need for affordable, social or Aboriginal housing. There are insufficient limits placed on single person dwellings, which fails to adequately provide for housing for families in the development.

#### No guaranteed open space or recreational area

The proposal refers to 'green space', but the percentage of green space in the proposal actually includes walkways and roads and is not necessarily useful open, safe space for play and recreation for the community and residents.

## No zoning of "recreational area"

There has been no provision for open areas such as parkland or play grounds for children, even though studies noted a lack of these types of facilities in the area. I would prefer to see the removal of the two big office buildings immediately behind Wilson Street to create an open, safe recreational space that delivers the community with much needed real green space.

## Inadequate definition of community space

An inadequate definition of community space in the proposal has been identified, and this could result in so-called community space being used for commercial purposes such as childcare businesses rather than true community facilities that are available to the public.

# Floor space ratio

The current proposal shows an increase of approximately 40% in floor space from the 2008 proposal. The sheer scale and height of this new proposal and any resulting development is inappropriate.

## No noise and vibration impact assessments for Wilson Street

Considering the scale of the development and excavation required for the increased height and size of the proposed buildings together with the close proximity of our property to the construction work it is absolutely vital that the structural integrity of our building before considered before the nature of any major work is approved.

# Length of construction

The proposal estimates 8-10 years of construction in the Redfern Eveleigh precinct. This will be a serious and long-term intrusion in the lives of all neighbourhood residents, particularly residents of Wilson Street as we reside so close to the construction site. I disagree strongly with the view that the proposal states that the project will improve mental health of residents and would like to see the project scaled back to a more reasonable density level and time frame.

# **Heritage impacts with Paint Shop**

The proposal allows for a building of up to 63m to be built on top of the Heritage Paint Shop Building. This will destroy the unique roof and should not be permitted.

## **Mixed Use**

It is proposed to re-zone the entire site as 'mixed use.' This will mean that all land could possibly be developed at a later date. The zoning needs to be amended so that the open space cannot be developed and can only be used as open recreational space.

# Planning Submission Documentation - North Eveleigh Paint Shop Proposal Submission from a resident of Wilson St

I am writing this submission as a resident of Wilson Street Darlington NSW 2008 (WWW Wilson Street) regarding the North Eveleigh Paint Shop Proposal.

I have grave concerns about the proposed rezoning and redevelopment of the North Eveleigh Paint Shop site. There are 35 apartments at Wilson Street, three sides of our property border on the proposed rezoning area. Based on the current re-zoning proposal, all of the apartments in Wilson Street will be significantly and detrimentally impacted as a result of this development in its proposed form.

The concerns I have are as follows:

# A. Impact on the structural integrity of Wilson Street

- 1. As per the design guide, buildings F, K2, L1, K1 and P are all new buildings to the area and are in close proximity to Wilson Street. I have concerns that the increase in allowance of building height, from the current permissible heights, and the impact of the construction of these oversized buildings, may have on the structural integrity of Wilson Street.
- 2. The Noise and Vibration Assessment report is basing the construction impact from a 2008 report that only considers buildings that directly back onto the rail lines, and do not consider the quadrupling of the height of the buildings submitted in this re-zoning proposal.
- 3. Comparable buildings of a height of up to 128m require deep excavation which has clearly not been considered in the current proposal. I object to the increase in building heights to their current levels of buildings F, K2, L1, K1 and P on the basis that these buildings are likely to have direct negative consequences on the structural integrity of Wilson Street. I believe the current allowable building heights, as per the current zoning, is adequate to allow for a full regeneration of the area in line with the design guidelines, in a way that is also unlikely to have such a dramatic effect on the surrounding residences.
- 4. I also note that no assessment has been completed with respect to the rezoning of the potential impact of construction vibration to adjacent buildings, nor is this required to be considered as the design guidelines do not have this as a requirement. Any future works should also consider the construction impact on the immediate surrounding dwellings.

#### B. Height of buildings are inappropriate

- 5. The height and storey restrictions of the proposed buildings are entirely inappropriate for the area and are not in line with the area's status as a conservation area. The scale of the buildings K2, L1, P, K1, E1, E2 and possible addition above the Paint Shed is excessive, against the design principles and not in keeping with the character of the area.
- 6. I refer to the Public Domain, Place and Urban RNE Design Masterplan which in section 5.1.2. referred to the Innovation Precincts Building Typologies and stated that there are "tall buildings in successful districts setting precedent for height' however, the comparable buildings referred to were significantly smaller in both actual height and number of storeys than is being proposed in this re-zoning, specifically the Foundry in South Eveleigh is six storeys and the Sydney University Business School is seven stories. If these buildings are the height precedence for the area, all building heights in this proposal should be reduced and no change in the current allowable building heights should occur.
- 7. Current building heights on Wilson Street are no more than 12 metres. This proposed re-zoning is allowing for buildings to be built up to 58.2m on Wilson Street, and up to 128.8m on buildings

- behind Wilson Street. This scale is not appropriate for the area and current height restrictions should remain on the entire site.
- 8. The maximum height of buildings on Wilson Street being 58.2m is not appropriate for a conservation area that is currently a primarily residential street, and is not in line with the current residence design of terrace housing and low-rise set-back apartment buildings. The vision of the North Eveleigh re-zoning is for the new buildings to be built positively into the surrounding urban fabric. This will not occur if the development occurs at its proposed building height limits. It will be a clear and obvious eye-sore that does not integrate into the area and will become a blight on the landscape for all current residents.
- 9. Further to this, the statement that the proposal's built form "will provide an appropriate transition from the low rise and fine grain scale of Wilson Street, industrial scale and texture within the curtilage of the robust industrial Paint Shop to taller articulated tower structures closer to Redfern Station" is factually incorrect and clearly does not allow for a seamless integration between small terrace housing and low-rise apartments by allowing for buildings of up to 58.2m on Wilson Street, and 128.8m towers behind. This proposal dwarfs all existing structures on Wilson Street and is not considerate of the heritage and community. Residents see the proposed building heights as grossly excessive and will result in monstrous constructions that will overpower the neighbourhood.
- 10. This proposal of building heights of up to 128.8m is not in line with recent development in South Eveleigh, or the Carriageworks and the design principles should be extended to consider the impact on these buildings and sub-precincts. The re-zoning should only allow for heights that are similar to what has been approved and constructed in South Eveleigh and Carrigeworks to continue the appropriate design that has been successful in these areas.
- 11. The current floorspace ratio of 2:1 should also remain, and not be increased to the proposed level of 2.78:1 and all open space removed from the allowable floor space ratio for development to ensure that the buildings & development plots do not get floor space that would be deliberately imbalanced against the entire site.
- 14. Importantly, the height of the proposed building will reduce light into many of the apartments in Wilson Street as discussed further in Section E below. This will breach the owners and tenants' rights to enjoyment of their property. Light is essential to wellbeing.
- 15. The height will also dramatically alter the views from many of the apartments facing South Eveleigh. This will breach the owners and tenants' rights to enjoyment of their property. I disagree with 3.4 View Place Sensitivity in the Visual Impact Assessment report that the views on the immediately surrounding streets would not have a negative visual impact if the proposed built form is built, as there would be a loss of a view of the skyline, open space and the heritage buildings in this sub-precinct and the South Eveleigh precinct. Further, a view of monstrously high and overpowering sky-scrapers is an entirely inappropriate replacement for existing enjoyable views. Section 3.5 in the Visual Impact Assessment report states "southfacing units at Wilson Street that projects into the site will be exposed to potential views from the site" and I disagree with the statement that the views that would be lost would not be "views of high scenic quality, iconic views or access to views of individual icons." These south facing apartments have views of all heritage buildings in this precinct, the South Eveleigh heritage buildings and have wide ranging enjoyable sky-line views. The deliberate exclusion of these residences from the view-loss analysis is inappropriate and if included would suggest that development of this scale and height should not proceed as the views of the proposed form would be highly unpleasant.
- 16. The sky-view assessment also does not measure the sky-view impact that residents of Wilson St would experience as a result of this development. Based on the height and proximity of the proposed developments, it is likely that most apartments in Wilson St will lose most, if not all, of their sky-view and the loss will exceed City of Sydney requirements. This together

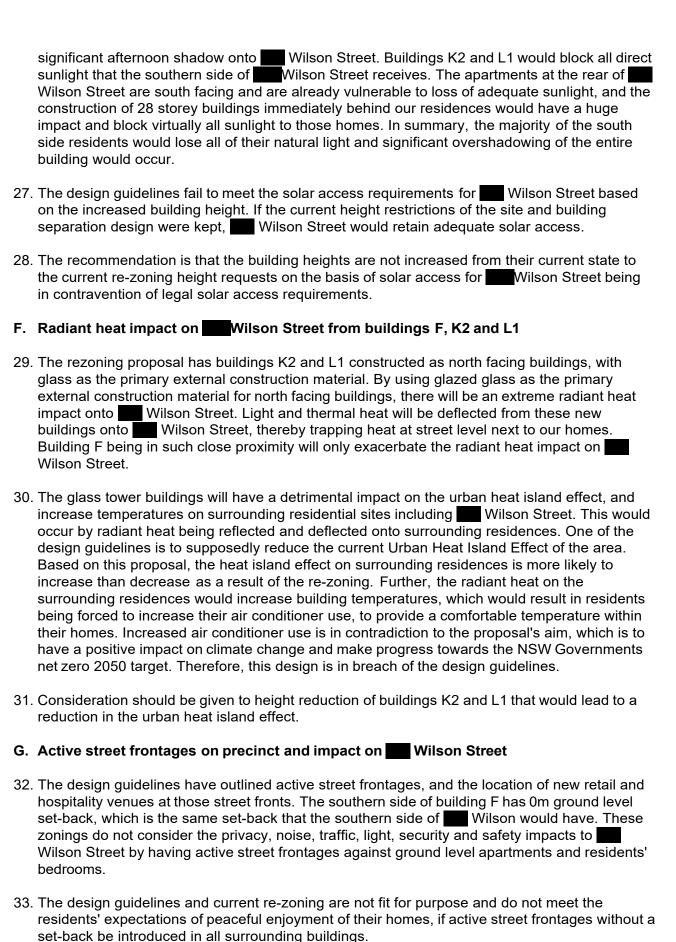
with the exclusion of the Wilson St from the Visual Impact Assessment report, is incredibly concerning and the development scale should be re-considered. C. Building and street set-back against Wilson St 17. Section 5.1.7 of the Public Domain, Place and Urban Design Masterplan outlines that there is a requirement of adequate building separation distances of: • 12m set-back against a maximum 4 storey development • 18m set-back against a maximum 8 storey development • 24m set-back against a 9+ storey development. The design guidelines do not mandate that this set-back must occur for any building that is built near Wilson Street. 18. In the current proposal, the floor plate and allowable development space of Building F is right up to the property boundary of Wilson Street, therefore this re-zoning in its current state allows for a 5 storey building to be built to the boundary of Wilson Street. 19. Buildings K2 and L1 have a maximum allowable number of storeys as 26. The current layout and spacing between K2, L1 and Wilson Street does not provide a 24-meter separation. 20. Therefore, this current design guidelines and re-zoning proposal is inadequate to meet the requirements of building separation. Without adequate set-back, Wilson Street residents will be adversely affected by this development and will lack appropriate privacy and security protections. 21. I am proposing that the mandated set-back area against Wilson Street be re-zoned as recreation zoning and be used as parks and safe play space for children and families of the area. This would be in line with community expectations of an outdoor life and enhances wellbeing. This approach would also be similar in nature to other small family friendly parks in Newtown, Erskineville, Alexandria and Redfern. D. Shared road directly behind Wilson Street 2. The proposal outlines that a shared road be built immediately behind wilson Street apartments. According to the design guidelines, the road will directly abut wilson Street apartments, especially the bedrooms and living spaces of 20 apartments. This road would be considered a public roadway and does not provide a minimum setback in line with Government Requirements of 3m for rear setback controls. It would not be appropriate to have zero set-back against Wilson Street. 23. If an adequate set-back is not provided, the design guidelines fail to provide adequate separation of people's homes, leading to a lack of visual privacy, lack of recognition that residents of Wilson Street require privacy, lack of security for the building, and increases noise pollution from pedestrians and vehicles due to the street's close proximity. 24. Residents of Wilson Street will not be afforded the opportunity anymore to peacefully enjoy our homes. Residents have had peaceful enjoyment of their homes for over 30 years and

# E. Solar impact of the development against Wilson Street

object to this being taken away from us.

25. The proposal allows for building F to be built up to 54m, and buildings K2 and L1 to be built up to 128.2m.

26. The design guidelines fail to consider the solar impact and loss of light that would occur to Wilson Street if the current re-zoning application is approved. Building F would provide



# H. Precinct entrance at Shepherd St, Ivy Lane and Little Eveleigh Street

- 34. The introduction of new access points off Shepherd St and Ivy Lane and Little Eveleigh Street are inappropriate and create a major safety hazard for pedestrians and cyclists on Wilson Street. All streets surrounding the Paint Shop sub-precinct are quiet residential streets that get greater foot and cyclist traffic than vehicle traffic.
- 35. The recently completed cycle way along Wilson Street, forms part of the City of Sydney's Cycling Strategy and Action Plan and is used by countless cyclists every day.
- 36. To have the entry to the proposed precinct cross this cycle way is unsafe and contradicts the City of Sydney's masterplan to provide a safe cycling network across the city. Having the entrance and exits onto this precinct via narrow residential streets, crossing busy pedestrian and cycle ways, without consideration of safety, is irresponsible and an example of poor planning.
- 37. Other access points should be considered for the primary access, including linking up to the existing Carriageworks Way to ensure vehicle traffic does not create safety hazards by crossing pedestrians and bicycle pathways.
- 38. An approach similar to the entrance constructed on the South Eveleigh site onto Mitchell Rd and Henderson Rd is appropriate as there are existing main roads with traffic lights that could accommodate an increase in vehicular traffic. Wilson Street, Shepherd St, Ivy Lane and Little Eveleigh St cannot accommodate this. It is inappropriate to make these major site access points off minor quiet residential streets.
- 39. Further, consideration should be given to the extra 10,000 pedestrians that are expected to be walking down Little Eveleigh St, Wilson St, Shepherd Let, Ivy St, Ivy Lane and Codrington St each day as a result of the Southern Concourse construction at Redfern Station, the introduction of the Waterloo station and the potential increase of pedestrians once all students return to face-to-face learning. This proposal should be considered against the Southern Concourse construction and pedestrian movements.

# I. Inadequacy of traffic and noise studies undertaken - wrong area of Wilson St

- 40. The traffic and noise studies that support this rezoning application are inaccurate, and in the instance of a traffic study non-existent. The design guidelines are therefore based off deliberately missing or misleading information.
- 41. I refer to the Noise and Vibration Assessment Study where it states that no traffic studies were undertaken, and therefore the assumptions on current vehicle trips of 350 during the AM peak hour are invalid and not appropriate to use as a reference point. The report equally does not consider the traffic impacts on bringing a major precinct access point into the quietest end of Wilson Street (between Shepherd St and Ivy St) that currently has the least amount of traffic. This area is likely to experience a significant increase in vehicle traffic if the re-zoning goes ahead and is not in line with community expectations of a quiet residential street.
- 42. Considering that the assumption on current vehicular use of Wilson Street is invalid. The assumption that the AM peak hour trips would only increase to 520 trips and would have a negligible impact by increasing noise by <2dB(A) is also invalid. My view is that there would be a significant noise and vehicle trip increase during all times of the day and night as a result of this proposal.
- 43. The proposal also does not consider the impact on vehicular trips outside of peak hours that would increase as a result of the zoning to make this a "24-hour" precinct that allows late-night venues. A further traffic assessment that considers the impact of introducing restaurants, bars, cafes and late night venue traffic and bringing this traffic onto a quiet residential street is essential in order to adequately consider the traffic noise impact.

- 44. In the current form it is likely that residents of Wilson St will get a significant increase in traffic noise at all hours of the day, which does not allow for peaceful enjoyment of our homes. This will be particularly noticeable to the residents on the southern side of Wilson Street whose bedrooms will abut directly onto a major access road, where there will be traffic at all hours.
- 45. With the expectation that over 700 residents and 6000 workers will be in the area every day, along with "visitors" to the retail, hospitality and community facilities, there will be more noise impacts than currently outlined. The design principles are inadequate in relation to traffic noise, and if they were adequate would not support a development of this size being inserted into a residential area.
- 46. The traffic noise plans also do not account for the volume of waste management services that will be required to service the site.
- 47. The road traffic noise intrusion assessment that occurred out the front of Wilson St on June 16 July 7 2021 states recorded traffic noise is 53dB(A) during the day and 46dB(A). The area selected for the road traffic noise intrusion assessment is inappropriate as it is not the part of Wilson St that will be most affected by road traffic noise. The assessment should have occurred on Wilson St between Shepherd St and Ivy Lane.
- 48. I also note that the Noise and Vibration Assessment Study sates that the noise is unlikely to impact the proposed new residential buildings, but nothing is recorded on the impact on the current residential dwellings. This suggests to me that their deliberate exclusion from this report would mean that noise levels would be detrimental to current dwellings. Therefore, the design guidelines and rezoning are inappropriate on the basis of traffic noise impact to existing residents.
- 49. The noise controls are also not adequate for a residential area where construction of a site is expected to last 8-10 years. The proposal allows for construction to begin at 7:00am, whereas City of Sydney recommends a start time of 7.30am in residential areas.

## J. Noise pollution

- 50. Considering the re-zoning request is as broad as could possibly be and allows for late night venues, live music venues and outdoor events to occur within the precinct, no consideration has been given to the long term noise pollution that would occur as a result of this zoning change and increase in density of the area with over 7000+ people in the area each day.
- 51. The southern side of Wilson Street will be most detrimentally impacted as a result of the zoning changes and lack of reasonable noise controls, and volume of people due to having commercial, retail and hospitality venues directly opposite and beside people's apartments.
- 52. The noise of people entering and exiting buildings F, K2, P and L1 each day, along with the option to use the outdoor space for commercial purposes without adequate noise controls, will create permanent ongoing harm for residents in Wilson Street. The re-zoning should not allow for the increase in density nor the increase in the floor space ratio on the basis of the potential permanent unacceptable noise levels that would be inflicted on the residents of Wilson Street, 24/7.
- 53. The Noise and Vibration Assessment Study in 'Table 13' outlines the project amenity noise; however, it fails to consider the cumulative noise impacts of the entire site, including outdoor pedestrian noise from 7000+ people in the site every day on the surrounding area. This would significantly raise the noise levels surrounding existing dwellings and residents. There is no consideration for the detrimental health impacts noise pollution can cause, such as hearing loss, headaches, fatigue, high blood pressure, heart disease, sleep disturbances, stress and mental health issues. This needs to be considered from both a permanent perspective once the

development is completed and for the 8-10 years of construction noise that residents would suffer through whilst it is being built.

54. On the basis of noise pollutions impacts to residents in existing dwellings, especially Wilson Street, the entire site should not be re-zoned for mixed use at the proposed density. There should be dedicated zoning around existing residences, such as, recreational zoning that reduces the harm permanent noise pollution could cause.

# K. Light pollution

- 55. In the current design guidelines a request to increase the allowable height of buildings K2 and L1 to 128.2m and building F to 54m. K2 and L1 are designed for the exterior to be made out of entirely glass and used as office buildings. No impact assessment from a light pollution perspective has been undertaken on surrounding residences, including Wilson Street to demonstrate the impact of placing two glass buildings immediately behind residences.
- 56. Most office buildings keep their lights on at night and this will cause significant light pollution from glare, light trespass, and clutter (grouping of lights that collectively generates too much light at night) to the southern facing residents of wilson Street, and all other southern facing residences on Wilson St, and Wilson Lane with lights glaring all night into residents' living rooms and bedrooms. I disagree with the Pollution Assessment report that the lighting from the buildings on Wilson Street will be "unlikely to affect the neighbouring properties." Further this Pollution Assessment report states that the proposed buildings on the southern perimeter of the site "facade/outdoor terrace lighting may affect the rail corridor." It is worth noting that the impact of this light on wilson Street, and all other residences in the area has not been studied, even though these residences will be exposed to the same amount, if not, more light than the rail corridor due to the proximity of these developments and the active street frontages facing wilson Street apartments.
- 57. The significant light pollution that would occur as a result of this development does not consider the adverse health impacts on existing residents including: sleep deprivation, fatigue, stress, headaches, anxiety, reduction in melatonin production and current medical research that indicates a potential link between artificial light and cancer.
- 58. The re-zoning should not allow for the height of the K2 and L1 buildings to create such significant light pollution, and the current height restrictions for the precinct should remain in place.

# L. Inadequate provision of housing suitable for multi-person homes including families (Apartment Mix)

- 59. The design guidelines refer to studies and recommendations that state that most apartments in the area are for single person households and that the expectation that lone person households are the group that is expected to have the greatest increase in demand for housing. However, this fails to recognise that families and multi-person households are unable to find suitable housing in the area and are therefore being forced to leave due to inadequate provision of housing suitable to their needs. The design guidelines and apartment mix (9.5.13) fail to address this need by setting a minimum requirement of 40% of 1 bedroom or studio apartments. Minimum limits on 3 and 4 bedroom apartments should be increased to provide adequate housing for families and multi-person homes.
- 60. The design guidelines refer to "diverse housing," however a clear definition of "diverse" is not provided. The 30% target should not be left open to interpretation to a developer as to what "diverse" means, as this could potentially then continue to fail to address the housing crisis facing the area. "Diverse" housing leaves open the opportunity for a minimum of 15% of all housing to be student housing, which is not required to have as high building, design and apartment fit out standards as residential apartments. Increased student housing in an area

where there is already adequate student housing is unnecessary and fails to address the core housing crisis in this LGA.

- 61. The Social Infrastructure Study and Health Impact Assessment report also states that "more than 5000 City area residents were living in severely crowded dwellings, temporarily with other households" along with homelessness. The current design guidelines fails to address the lack of appropriate sized dwellings for multi-person households and the urgent need to increase social housing. Further, by all housing in this development being privatised it will exacerbate housing affordability problems in the LGA. This same report also states that "international evidence has shown that innovation distractions are known to reduce housing affordability and displace many lower-income earners and long-term residents." With this in mind, the design guidelines and re-zoning should be radically re-thought to ensure that there will be no adverse impact on the areas most vulnerable residents and long-term positive housing solutions for these residents be incorporated.
- 62. The design guidelines and re-zoning change request do not meet community expectations regarding the lack of social housing, and the lack of definition of "diverse housing." Further, without guaranteed housing for First Nations the design also does not meet community expectations.

## M. No guaranteed open space or recreational area

- 63. The request to re-zone the entire site as mixed-use, without guaranteeing that the areas in the plan listed as "open space" be zoned as "recreational area", demonstrates that there is an inherent failure in the re-zoning request to meet the design guidelines of "great public space." If the entire site is "re-zoned" as mixed-use with the proposed density and floor space ratio there is no guarantee that the spaces marked as "open-space" will actually be open space. It would allow the developer to put buildings on and commercialise the open space for their benefit. Appropriate zoning of "recreational area" should be applied to these spaces, to guarantee that they can only be used for recreation.
- 64. Using recreation area zoning would also be in line with the South Eveleigh development, where recreational area zoning is applied and parkland and sporting facilities are guaranteed for the community.
- 65. Further, by using a lower level planning document the design guide to say where the floor space should go rather than allocating it building by building provides greater flexibility for the developer who purchases the site, and no certainty for the community. By using this design guide over a more appropriate planning document for a site of this scale, it is likely that the developers plans will deviate significantly from these guidelines and be more likely to have a more extreme impact on the community and existing residences.
- 66. Further to this, according to 5.1.3 in the Context Analysis, it is stated that there is a void of open space within a 500m radius of the development, and a general deficit of sporting and recreation facilities in the area. It also notes that the available open areas are very small and any increase in density requires a proportional increase in open space. If this development is to bring in what is a likely 10-fold increase of people into the area each day a significant increase in guaranteed open spaces, sporting facilities and safe play areas for families is absolutely essential.
- 67. Due to the lack of zoning of recreational areas in the Paint Shop sub-precinct the design guidelines and zoning is totally inadequate in addressing the Context Analysis and the deficit of appropriate outdoor spaces for the community.
- 68. The proposed "open-spaces" does not provide safe play areas for children, especially children with disabilities and mobility issues, and there is no provision for community sporting and

recreation facilities. There is also no provision for public amenities such as toilets.

- 69. The Social Infrastructure Study and Health Impact Assessment report states that a key consideration to improve the health and wellbeing of the area should be "greening the urban environment to support community wellbeing." Without guaranteeing green space through zoning of appropriate recreational areas, the development will fail to improve the overall health and wellbeing of residents. It is worth noting that this same report states that the levels of mental health distress in this local government area is higher than other areas, and the lack of appropriate green and outdoor space in this area. There is a significant body of scientific research which demonstrates that lack of green outdoor space has detrimental effects on mental health, such as higher levels of mental distress, higher stress levels, higher levels of anxiety & depression and higher levels of disease prevalence for both adults and children. Adequate provision of green space needs to be provided in this development, to ensure that an improvement in community health outcomes can be made and the health of the children in the community can be protected.
- 70. My recommendation is that K2 and L1 be rezoned as recreational areas and have purpose built sporting and safe play areas built for children. This would still allow for appropriate development to occur on the site, be best connected to the new apartment sites whilst also providing an adequate level of safe spaces for children, families and all residents to use and in keeping with the expectation of an Australian outdoor lifestyle where everyone is able to participate in outdoor sports and pursuits, and meet the design guidelines and renewal principals in full. This will also improve the health and wellbeing of the community, in line with the need outlined in the Social Infrastructure Study and Health Impact Assessment report.

## N. Inadequate definition of and provision of community and cultural space

- 71. The design guidelines outline a renewal principal of a "great place for the community;" however, the current rezoning proposal will not be an inviting space that will draw people in. Rather, it will be a total monstrosity and blight on the landscape which is fully commercialised.
- 72. A fully commercialised space zoned as mixed-use inherently means low income earners and those with no disposable income will never be able to enjoy or use the space. As such, this proposal is exclusionary of the most vulnerable Australians who could most benefit from community and cultural space. In addition, a fully commercialised space is not in line with community expectations and needs. The design guidelines only mandate that 1.6% of the gross floor area is required to be community space, and as the community space will be in the developer's private hands there is no guarantee that the community will ever be able to access these spaces. No provisions have been made to ensure that First Nations health or community spaces will be provided, and this is not in line with the Connecting with Country framework.
- 73. Further, the current definition of "community use" includes commercial uses such as run-for-profit childcare centres, which is inappropriate and not in line with the definition of "community use."
- 74. The design guidelines allow for 72.2% commercial use, and only 1.6% for community and cultural use. There is an inadequate provision of guaranteed community and cultural use space in public ownership.
- 75. The design guidelines should increase the amount of community space and mandate that they remain in public ownership to ensure they are protected from commercial interests.

## 0. Heritage impacts and lack of coherent identity

76. The design guidelines state that this rezoning proposal will "respect the past, adaptively re-use heritage buildings in the precinct and will acknowledge Redfern's existing character" and

"building positively to its surrounding urban environment."

- 77. The proposal does not respect the past, and nor does it provide respect to the heritage buildings and character of the area. The area is a heritage conservation area and modern-skyscrapers which tower over and dwarf the entire area which has a negative impact on the surrounding environment and the people who live in neighbouring areas, can in no way be construed as positively impacting the locale.
- 78. The Paint Shop are seen as buildings of significant heritage value, primarily as a result of the unique roof. The current proposal shows that a building of up to 63.6m can be placed anywhere above and over the entirety of the building. Doing this would ruin the heritage of the Paint Shop and not allow anyone to enjoy the unique heritage of the building. The rezoning should not allow for a building to be placed above the Paint Shop.
- 79. It is worth noting that the design guidelines are entirely inadequate to protect the heritage of this building as there is no information on how much of the Paint Shop could be covered by the building and how much floor space would be in the subsequent tower over the top of the paint shop, and this can be changed by a future design excellence process.
- 80. It is also concerning that the Paint Shop is the only existing heritage building in this proposal that its existing height and structure is not protected.
- 81. The design guidelines also state that this proposal will facilitate a "coherent identity." Upon reviewing the detail in all of the supporting documentation, I disagree that a coherent identity will be facilitated. The current proposal allows for the destruction of and minimisation of the existing heritage value and character and does not provide an identity that is in line with community expectations.

## P. Make the Paint Shop sub-precinct Australia's largest multi-arts centre

- 82. The renewal principals outlined in 'Table 2' in the planning report outlines that a key renewal principal of the site is for the Paint Shop sub-precinct to become "Australia's largest multi-arts centre", however, there is no requirement in the design guidelines that dedicated arts facilities be provided.
- 83. What is outlined is that of the minimal 1.6% community and cultural space, 1000sqm of this space be available for creative and cultural use which could be occupied by commercial tenants, such as private media broadcasting companies like Foxtel, that meet an intentionally broad definition of "creative."
- 84. This goes against the renewal principals and community expectations around multi-arts centres. The standard definition of a multi-arts centre is that there be public space that fosters innovation and creativity, and also allows art to be exhibited and cultural events to be run.
- 85. These spaces should be major cultural destinations that have the potential to attract national and international artists. These types of spaces are not suited to commercial ownership. In the rezoning proposal with the deliberately broad definition of "creative" that is open to interpretation by the developer. Therefore, the design guidelines and current rezoning proposal fail to deliver a multi-arts space for the community.
- 86. There should be a development plot that, like the Paint Sheds plot of H, that is publicly owned for the arts.

## Q. Length of construction - 8-10 years

87. The supporting technical documentation for the rezoning proposal of the Paint Shop subprecinct notes that if the proposal were to go ahead in its current state, development would take

- 8-10 years before completion. The design guidelines state that the proposal should improve the mental health of residents. I strongly object to this.
- 88. In no scenario does 8-10 years of constant construction and development improve mental health outcomes of any resident in the area. If anything, it will have detrimental health outcomes on all residents in the area from the air and dust pollution from the development, constant construction noise and construction traffic noise, disruption and damage to our residences.
- 89. The Pollution Assessment report states that there will be air pollution expected as a result of demolition, excavation and construction works and would be considered "temporary." I disagree with the view that this level of pollution is temporary as construction is expected to last for between 8-10 years, this level of increased pollution can result in irreversible negative health impacts. The health impacts of construction generated pollution are incredibly serious (e.g. respiratory illness, cardiovascular disease, reduced lung function in children, and links to early onset dementia), and the development control measures outlined are entirely inadequate.
- 90. This development will occur in a quiet residential area and permanently change the lives of all of the residents, including their children who from a young age will experience the adverse impacts of major developments on their lives.
- 91. The rezoning proposal should not go ahead in its current state to ensure that residents do not experience the harmful effects of 8-10 years of constant major development.

#### R. Wind tunnel effects

- 92. I refer to the Pedestrian Wind Environment Study for Redfern North Eveleigh where it states that "the wind conditions for the majority of the traffic able outdoor location within and around the Paint Shop sub-precinct will be suitable for their intended effect.'
- 93. As the study did not test wind impacts to the full-extent of the allowable building height, size, and number of buildings that could be built under the design plan, the results of this study are invalid.
- 94. The proposal does state that there are localised areas within the precinct which would exceed the assigned comfort criterion and could be managed by mitigation measures. However, since testing has not been done to the design guidelines full allowances there is no guarantee that more of the development area would exceed the comfort criterion and whether they could be adequately managed, or whether consideration needs to be given to the new buildings overall height and close proximity to ensure no wind tunnel effects occur.
- 95. As the areas that are likely to exceed the comfort criterion are out the front of the K2 building, and directly opposite the southern side of Wilson Street, the wind tunnel effects are likely to also adversely impact peoples' enjoyment of their own apartments and outdoor space that is in close proximity to K2. A reduction in the scale of K2 and greater separation between K2 and Wilson Street should occur to ensure existing residents of Wilson Street are not impacted by a wind tunnel, and unable to have peaceful enjoyment of their home.

# S. Climate Change

- 96. One of the objectives of the proposal is to support the government aims to get to net zero emissions by 2050. If the government did genuinely want to get to net zero emissions by 2050, the proposal would not include the development of five skyscraper buildings and three other excessively high buildings.
- 97. Current scientific research is clear on the impacts skyscrapers and overly tall buildings have on climate change none of them are positive. The embodied-carbon levels and operational-

carbon levels of skyscrapers are not environmentally friendly and a major contributor to climate change. Most research suggests that high-density low-rise developments and cities are more environmentally friendly than high-rise high-density developments and cities. As such, consideration should be given to updating the re-zoning proposal, and building heights to ensure that the area becomes low-rise high-density. Further, consideration needs to be given to guaranteed green space that is accessible and useable for both the community and native flora and fauna.

98. A revised re-zoning proposal would be more effective in making progress towards the NSW Governments net-zero 2050 target.

# T. Overall comments on the proposal and private ownership of the land

- 99. This proposal very clearly demonstrates that a lack of community consultation has occurred and community and environmental needs have obviously not been considered. The sale of this land is clear to all members of the community, that this is a money grab by the NSW Government. The re-zoning is to be as broad as possible, and offers no guarantees that any land be public open space. This is most concerning and incredibly disappointing.
- 100. The government has the opportunity to be at the fore-front of designing for the future in a climate and community friendly way that would be seen as progressive and world-leading if a different view was taken with this proposal. The government has the opportunity to regenerate this under-utilised open space and turn it into a much-needed housing and green recreational safe play, recreation and sports area that meets the needs of the community, by the land remaining in public hands. It might not return the cash to the government; however, the benefit to the community would be priceless. There would be measurable positive impacts to community health and social outcomes if the proposal was significantly altered to include and mandate recreation, and community space, as well as, a reduction in building height.

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 12:59 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 12:59

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

#### First name

Matt

#### Last name

Laxton

#### I would like my submission to remain confidential

No

# Info

#### **Email**

## Suburb/Town & Postcode

Newtown 2042

# Please provide your view on the project

I object to it

#### **Submission**

I wish to object to the current proposal for development of the Paint Shop precinct at North Eveleigh. My concerns are as follows:

- 1: overdevelopment of the site in relation to it's previous use and the current local area. The site has been empty for a considerable time and while I support some development of sites like this this proposal does not fit with the local amenity. The proposed high rise towers will be an eyesore and essentially visual pollution.
- 2: disruption to the local community during a long build time. As the site has limited local access the movement of trucks through the area would cause significant impact on the local community.
- 3: the sale/development of public space for private profit. Public assets need to stay in public hands
- 4: not enough public and affordable housing. More of this and less for profit needs to be mandated for any new developments proposed on public land.

## I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 12:36 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 12:35

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

sharlene

#### Last name

lane

I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

Redfern, NSW 2016

# Please provide your view on the project

I object to it

#### **Submission**

I am a long term resident of Redfern and have experienced the injection of high rise development, loss of amenity, reduced sunlight, congestion, very limited parking becoming impossible to access, damage to local residential areas and disregard of environmental health compliance, noise management that has been allowed to occur at the expense of people who live in area, pay rates and contribute to fabric of community.

The NSW Planning and Dept of Environment take no responsibility or oversight or regard to consulting with the actual communities that are impacted or respond in effective way when repeated incidents occur.

The scale of proposed project is far to large and excessive for the region and to honest is it really required.

The loss of open space, older buildings and high rise and project designs are not in keeping with the conservation zoning or residential nature of the area.

Redfern and surrounding area has significant historical story in the development of our nation and early settlement however NSW Planning and government have continued to approve excessive high rise developments not supportive of the cultural, historic and residential nature of region.

The Green Square region development with lower building heights, planned, planted and open corridors, swimming pools, underground parking, park lands, shops and other venues included into the residential and other buildings rather than over the top

off, is more tolerated than the proposed high rise development and loss of amenity to neighborhoods. Were possible the exterior design should incorporate original buildings and period features with contemporary interiors to meet competing views and purpose. Building above 4-6 storeys is excessive and demonstrated to be not healthy and detrimental. I am at a loss why knowing this the practice is supported.

I live with disability and have mobility card with limited capacity to walk or navigate uneven surfaces. Progressively the area has become less accessible with the approved developments and I like many people are being built out of the area and forced to leave our homes.

The government, nsw premier, planning talks about valuing front line workers and aging australia however fails to actually provide resources and access to accessible, affordable facilities. I urge the NSW Planning and government to cease giving into pressure for high density developments and invest in local communities. The areas lends itself to support alternate housing initiatives, community connections and open spaces. The region has had multiple high rise approvals many still to commence, why build on top of build on top of builds when they are not even completed and no consideration or review undertaken of the impact and actual use, sustainability or occupancy of current approved buildings.

I drive into the area now and see a image similar to photo of Shangi Hi, is this what we are to become.

Was the closure of NSEI a demonstration of another land grab for high rise development?

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 12:18 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 12:17

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Fernando

#### Last name

Quintal

I would like my submission to remain confidential

Nο

# Info

#### **Email**

# Suburb/Town & Postcode

2049

# Please provide your view on the project

I object to it

#### **Submission**

I'm all for redevelopment of the site near Carriage Works and I understand we need more housing in Sydney.

There's a main transport hub near that zone. Its an ideal spot for development; I Understand that.

What I don't agree with is a concrete jungle like the Zetland and Mascot corridors again! We need more green space, lower density high rise and more infrastructure in the form of better roads; before they add thousands more cars and residents to an already congested area!

This will create more congestion into the inner west where I live and I don't see any infrastructure being added to help this.

Surely this could be zoned as half green space and the apartments don't need to be 130m high which will be huge compared to what's around it! Preserve the heritage surroundings and maybe try and blend it in better!

The area will look like a ghetto soon.. there's no big park and the buildings look awful and will age badly!

This is simply the state government in cohorts with private developers again, and we see proof of this all around Sydney.

City of Sydney has rejected the proposal with very valid reasons so why is state government not respecting the city's view? If city

of Sydney had more control; half the building issues and court cases happening as a result of poor development and builds wouldn't be occurring!

Shame on the state government for ruining the lives of many! Look at mascot towers and maybe learn from it!

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, 25 August 2022 12:13 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 12:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Barbara

# Last name

McElwee

#### I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2066

# Please provide your view on the project

I support it

#### **Submission**

I believe that the proposal will make a dramatic improvement to both the local community and to the city generally. As a frequent visitor to the Carriageworks and its weekend market, I think that the development of the disused and dilapidated industrial railway yards around Carriageworks will bring significant & much-needed benefits.

The proposal seems to be a good combination of preservation of the area's industrial heritage and the need for more residential & innovative commercial/work spaces in central Sydney. The proposed improvements in public spaces, pedestrian access and green canopy/landscaping will make Carriageworks the heart of a revitalised and attractive neighbourhood.

## I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, 25 August 2022 11:42 AM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 11:41

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

## First name

Ben

# Last name

Matthews

#### I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2043

# Please provide your view on the project

I object to it

#### Submission

I would like to strongly object to this gross over development. One that is completely unsupported but surrounding infrastructure. Roads will be brought to a standstill. Huge over population. Surrounding schools will not be able to take the large influx of people. Noise pollution will bring negative impacts to wildlife and the community.

This community needs lower density, increased greenspace and more areas for positive community interaction.

## I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, 25 August 2022 11:40 AM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 11:40

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Alice

## Last name

Beasley

#### I would like my submission to remain confidential

Νo

# Info

#### **Email**

## Suburb/Town & Postcode

darlington 2008

# Please provide your view on the project

I object to it

#### Submission

To the department of planning,

Im actually not at all opposed to a development in this space.

I am concerned about the height and size, which are completely out step with the current area and street scape and the focus on commercial office spaces.

The area needs more homes and more affordable houses than what has been suggested. Office spaces seem kind of useless at this point in time when people are going into the office far less.

More homes also means the project would need more open and park space and more areas for community engagement.

Warmest wishes,

Alice

## I agree to the above statement



From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, 25 August 2022 11:26 AM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 11:25

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

## First name

Mitchell

#### Last name

Mcburnie

I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2008

# Please provide your view on the project

I object to it

#### **Submission**

To whom it may concern,

Whilst I am eager for this space to be used I believe that the height and purpose of the proposal is totally inappropriate for the area.

I would much prefer to see the re-zoning reflect residents desire for more green space or public space that builds a sense of community and social cohesion.

Mitchell

(Resident at Lander Street, Darlington)

## I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:33 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 22:33

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

#### First name

Robert

#### Last name

Kennedy

I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

REDFERN

# Please provide your view on the project

I object to it

#### Submission

- 1. Buildings on the site should not be more than 10 storeys. The scale of building heights in the current proposal is excessive.
- 2. Buildings hugging the properties on the south side of Little Eveleigh Street should have rooflines that suit the adjacent heritage terraces, not tower above them. These buildings should be single storey, or their position reconsidered.
- 3. The entire redevelopment should not be "mixed use", but rather zoning should properly guarantee adequate open space and public use areas.
- 4. There should be more details as to planned use of spaces and buildings.. There should be an outline of what commercial spaces will be used for, and what economic, social, cultural, or other good will they bring to the area.
- 5. More affordable housing should be built into the proposal. 25%, and 10% Aboriginal affordable housing, have been suggested.
- 6. A pedestrian connection between North and South Eveleigh should be part of any development. It could improve the way the whole Waterloo-Redfern area works, bringing it all together.
- 7. Clearer and more complete heritage protections should be provided. The Paint Shop should be protected from being built over.

#### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:48 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** 220825-paint-shop-sub-precinct.pdf

Submitted on Thu, 25/08/2022 - 10:47

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am submitting on behalf of my organisation

# **Name**

#### First name

Tom

#### Last name

Forrest

## I would like my submission to remain confidential

Νo

# Info

## **Email**

# Suburb/Town & Postcode

Sydney

# Please provide your view on the project

I am just providing comments

## Submission file

220825-paint-shop-sub-precinct.pdf

#### **Submission**

Submission from CEO of Urban Taskforce in relation to the sub-precinct.

## I agree to the above statement



25 August 2022

Department of Planning and Environment Locked Bag 5022 PARRAMATTA NSW 2124

Electronic submission

To whom it may concern

# Draft Paint Shop sub-precinct rezoning proposal – Redfern/North Everleigh

Urban Taskforce welcomes the TfNSW (TAHE) proposal for the development of the Paint Shop sub-precinct – Redfern/North Everleigh precinct, and sees this as an exemplar of what is achievable when large dilapidated industrial; precincts located close to a rail line are master planned for broad mixed use development.

Urban Taskforce notes that the current draft sub precinct plan seeks to provide between 103,700 - 109,500 square metres of GFA for employment and community facility floor space, supporting over 6,200 jobs. A third of the site, between 33,100 – 39,000 square metres of GFA, is allocated to deliver approximately 381 new homes, as well as a minimum 15% for affordable housing. A further 2,500 square metres GFA will be allocated to of community/cultural space, with a generous 1.255 hectares of public open space.

Urban Taskforce strongly supports the proposed B4 zoning which allows flexibility and permit a mix of commercial, residential, recreation and community uses. This flexible approach to zoning should be applied to other strategic industrial lands right across Sydney. This was a key recommendation (7.4) of the NSW Productivity Commission's 2021 White Paper.

Unfortunately the Greater Cities Commission's "Retain and Manage" Industrial Lands Policy has been applied as a "Retain, not Manage" policy.

This has sterilised many opportunities for mixed use development within these industrial areas and has contributed to the current housing supply and housing affordability crisis.

There are many sites within the Greater Sydney region which are tired and under-utilised and which, like the Paintshop sub-precinct, could be transformed and revitalised through a more flexible approach to zoning to allow for residential development.

The potential outcomes envisaged in the sub-precinct Plan illustrates Urban Taskforce's strong support for a new approach to industrial as recommended in the NSW Productivity Commission report.

The density and heights envisaged in the sub precinct plan reflect its potential for residential development, given its close proximity to Redfern Station and walking distance to three major universities.

The Design elements are supported and I note the proposed heights do not detract significantly from solar access in the surrounding areas due to the sites proximity to the railway lines and the ATP sheds.

Government land owning agencies must lead when it comes to delivering the housing stock a growing population needs and wants. Urban Taskforce notes that the NSW Productivity Commission's 2021 White Paper urges the Government to deliver housing where there is transport capacity (Recommendation 8.1)

The residential component will assist in meeting residential targets. The Greater Cities Commission has set City of Sydney Council a minimum residential target of just over 17,033 in the five years up to 2026. Yet the Department of Planning and Environment's own development dashboard shows that City of Sydney Council only delivered 2,249 homes in 2020/21–short of the targets expected of them. The entire corridor between Redfern and Central has a key role in providing the housing in locations close to transport and with high amenity.

The draft proposes an affordable housing target of 15%. While this may be appropriate for Government -owned land, this should not become a precedent for privately owned land, where the economic feasibility of development is significantly different to that of public land.

This site will be a place where people want to live – with high amenity and immediately next to an array of transport linkages that are the envy of most other parts of Sydney. Given the location of the precinct and its close proximity to Redfern Station, adjacent to the new Southern Concourse, as well as other transport infrastructure, the proposed heights and densities are supported

With NSW and Sydney gripped by a housing supply crisis, the proposals contained within the draft Paintshop sub-precinct rezoning proposal are laudable and supported. Sites on or adjoining rail stations and other key

transport links demand an appropriate response to help address this crisis. The Paint Shop sub-precinct is an example where the Government has embraced a level of density and height to deliver more housing.

It sets a model that should be implemented in many comparable sites right across Greater Sydney.

Should you wish to discuss this matter further, please call our Head of Policy, Planning and Research, Stephen Fenn on or via email

Yours sincerely

**Tom Forrest** 

Chief Executive Officer

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:38 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 10:38

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Anthony

### Last name

Kelso

I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode 2008

Please provide your view on the project I object to it

### **Submission**

Dear TfNSW,

I am a resident and owner of a property on Ivy Street in Darlington, some 250m away from the proposed development.

I support a rejuvenation of the paint shop area for our local community. However, I object to TfNSW's current proposal for the following reasons:

- 1. The scale of the development is not suitable for the area, which is mostly made up of 2-3 storey Victorian terraces and small warehouse conversions. The proposal is significantly larger than that made in 2008. 28 storey commercial towers are unprecedented in Darlington and are not suitable for the area. I would support a proposal with reduced retail and commercial heights, similar to those next to Carriageworks and more in keeping with the area.
- 2. The heritage value of the paint shop will not be retained due to the large extension and retail arcade. I would like to see this historical building maintained, as other buildings have been at South Eveleigh and Carriageworks have been.
- 3. While 1.4 hectares of green space has been proposed, the spaces are dispersed throughout the development and the mixed use zoning controls proposed do not specify locations or land sizes for community use. Quality green space needs to be consolidated, enlarged and guaranteed, as this proposal will significantly increase the population of Darlington. Darlington does not currently have any large green public spaces and this proposal has the potential to rectify that. Given the high proportion of dog

ownership in the area, I would also appreciate consideration of an off-leash dog area.

- 4. I am disappointed that there is no pedestrian access planned between South and North Eveleigh, which would greatly improve public access and amenity between the two areas.
- 5. The diversity of the Darlington / Redfern area is one of its strengths.. As the City of Sydney proposes, I would like to see a minimum of 25% social and affordable housing and a minimum target of 10% culturally appropriate Aboriginal and Torres Straight Islander affordable housing.

I would like to express my support for the City of Sydney's alternative proposal, which is more in keeping with the character of the

Thank you for your time and consideration.

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, 25 August 2022 10:22 AM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 10:21

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Maurice

#### Last name

Thibaux

#### I would like my submission to remain confidential

No

# Info

#### **Email**

### Suburb/Town & Postcode

Darlington

### Please provide your view on the project

I object to it

### **Submission**

I am concerned about the lack of road / cycling and pedestrian traffic connectivity north to south. Darlington is trapped already between Sydney Uni and the rail line. This increase will cause massively more congestion in the area.

The height of the proposed towers is excessive and destroys the overall aspect of our suburb and ruin its heritage value.

Open space seems to be fragmented and not matching the huge increase in population and business and office space.

This is a major increase of the original plan and will seriously affect the quality and enjoyment of the public space.

The most important people to move in the area are service workers who are mostly low income. A larger proportion of residential construction must be provided for these essential workers and their family.

Somehow aboriginal and railway heritage must be preserved.

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, 25 August 2022 10:11 AM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** north-eveleigh.docx

Submitted on Thu, 25/08/2022 - 10:08

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

# Name

### First name

Diarmuid

#### Last name

Maguire

I would like my submission to remain confidential

No

# Info

### **Email**

# Suburb/Town & Postcode

Sydney NSW 2016

### Please provide your view on the project

I object to it

### Submission file

north-eveleigh.docx

### **Submission**

Read it

### I agree to the above statement

# Redfern & North Eveleigh Proposed Precinct Development

- 1 The development of North Eveleigh must be seen in the context of the recent development of South Eveleigh. North and South Eveleigh are united by heritage, function, and proximity.
- 2 North and South Eveleigh provided locomotive workshops and munitions in two world wars. The heritage of Eveleigh comes from the industrial era but also the employment of the local aboriginal community. The first name of Redfern Station was Eveleigh Station demonstrating the importance of this workplace and surrounding residencies. The heritage value of this site has received international recognition from the Smithsonian Institution.
- 3 Eveleigh is separated by rail but that could easily be resolved with the construction of a footbridge. This would allow the advantages on each side of this park to invigorate the other. In fact, managers on both sides of Eveleigh thought a footbridge would be constructed in 2018. Transport blocked its construction for some unknown reason.
- 4 With a holistic approach to this project, that warrants a closer look at the development of South Eveleigh. I argue that the approach to South Eveleigh could become the model for North Eveleigh. First, Mirvac respected the 16 heritage workshops on Locomotive Avenue by building an adjacent six-nine storey "groundscraper". Mirvac did not propose a 28 storey skyscraper just one proposed for North Eveleigh. In South Eveleigh, the height of new buildings demonstrates respect for heritage buildings.

5 Second, the use of existing heritage sites does not interfere with the existing format of these buildings. In South Eveleigh, the "new" bows to the "old", by clever use of interior structures. I recommend that North Eveleigh should be developed in a similar manner.

6 On that basis, there should be no structure built on top of the Paint Shop. This would vandalise heritage with a box-like monstrosity. In North Eveleigh, all workshops should be restored under the guidance of the Heritage Council of NSW. Further, no matter how heritage is judged in relation to individual buildings, Eveleigh contains the largest steam engine workshop in the world. According to the Heritage Council of NSW: "The Paint Shop building is a great opportunity for a low-rise re-use similar to that of the low-rise Locomotive Workshop in South Eveleigh and should not be compromised ... A building on top of the Paint Shop Sub-Precinct, risks heritage impacts and jeopardises the significance not only of the that building, but of the whole complex."

7 In terms of height, it is important to take into account the existing effects on South Eveleigh. Heritage sites on Locomotive Avenue are respected through the "ground-scraper" building (the Commonwealth Bank). I suggest that the height of this "ground-scraper" be considered the same for North Eveleigh developments (i.e. around six to nine stories). This height would have the added advantage of respecting, but not overshadowing, the heritage of nearby Carriageworks. In my view, this represents an elegant solution to both sides of Eveleigh.

8 North Eveleigh is a cultural area while South Eveleigh has become a commercial area. Both sides are united around important industrial history and heritage. I argue that is better to unite these two areas with a footbridge rather than replicate commerce in North Eveleigh. In that way, there would be more room for housing on North Eveleigh.

- 9 I believe developers should pay the costs of the construction a footbridge between North and South Eveleigh. This would be one of the prices of entry into this contract. No attempts to subvert planning rules should be offered in return.
- 10 Housing fits into three categories market, social, affordable. "Diverse" seems like a strange category and is probably being used to justify "student" housing. Even though I work at Sydney University, I don't want to see North Eveleigh become yet another student dormitory. Redfern is already filling up with skyscraper-dormitories used for only part of the year. If Sydney University wants a student dormitory, then it can use some of its \$1 billion in profit it gained last year to construct one. If students use new housing in North Eveleigh, then this should be classified as market housing not "diverse" housing.
- 11 I recommend minimum 30% social and/or affordable housing. I also recommend minimum of 10% for Aboriginal and Torres Strait Islander affordable housing. Eveleigh is an integral part of Redfern.
- 12 Any residential or commercial building built near a railway station should only have minimal car parking space. This space would be used by visitors carrying out repairs or delivering essential goods. Sydney has good public transport with Redfern Station nearby. This would make the cost of housing cheaper, reducing carbon and traffic.
- 13 Property developers seek maximum returns to capital with little thought about impact. The community and government should reimagine these proposals and impose their vision upon

developers. I can imagine Eveleigh Park as a tourist site, demonstrating Sydney's industrial, aboriginal, and trade union history. When visitors arrives at Eveleigh, they appreciate Sydney's history through architecture while enjoying its cultural, social, and commercial activities. I can imagine students from High Schools or TAFE learning in these large industrial sites. Already there are small courses offered in welding in South Eveleigh. Whatever the community decides, this site should not be turned into a series of coffee bars mixed with the usual retail outlets. Instead, recreate heritage architecture process used in South Eveleigh and add a footbridge.

14 In putting forward this plan, TfNSW must be regarded as a property developer. TfNSW seeks to gain maximum profit from this sale. However, TfNSW has drawn attention from other state bodies through its activities in this area. Therefore, it is important that TfNSW be subject to the highest scrutiny.

15 The Sydney community had only had one month to uncover and respond to these plans. I request that you open this process of participation for another month. I read the PhD thesis written by state minister, and took great heart from his commitment to community participation in planning. The minister wrote: "Using meaningless participation as a facade to cover over disagreement merely clogs up conflict, creating a dam of resentment, which spills over in the form of increasing litigation, loss of trust in politicians and administrators, and poor planning outcomes".

16 If this simple request raised in point 15 is not met, then we assume that these documents exist purely for information - not consultation, involvement, collaboration, empowerment.

Diarmuid Maguire Secretary South Eveleigh Residents 'Action Group

NSW 2016

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 9:51 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 09:50

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Bruno

#### Last name

Quintal

I would like my submission to remain confidential

Nο

# Info

#### **Email**

### Suburb/Town & Postcode

2043

### Please provide your view on the project

I object to it

### **Submission**

For those who live in the inner city Or Erskineville/ Redfern area; this is a total disrespect to the landscape of our neighbourhood and why we live here!

I'm all for redevelopment of the site near Carriage Works and I understand we need more housing. There is a main transport hub near that zone and it's an ideal spot for development; I understand that too.

What we don't need is another concrete jungle like the Zetland and Mascot corridors again! We need more green space, lower density high rise and more infrastructure in the form of better roads; before you add thousands more cars and residents to an already congested area!

Sydney Park is already so congested as it's the only big green space for miles! With so many apartments already around it! Why not use half of this space to create another green space and large park?

Surely this could be zoned half green space and the apartments don't need to be 130m high which will be huge compared to what's around it! Preserve the heritage surroundings and maybe try and blend it in better! Make the buildings look green like the one on Broadway or at least make them attractive so they stand out and look good! This looks so cheap and will age incredibly fast!

This is simply the state government in cohorts with some private developers again, where someone's pockets is clearly being filled

up. City of Sydney has rejected the proposal and I live in Ashmore and there's still properties that have sat here for years unoccupied due to the state governments corruption with developers and private certifiers! Half the buildings around mine, including mine, have major defects and a few are in court cases with developers in the Supreme Court! Yet the state government wants more of this? What a joke!!

Stop ruining our city! Put people first and not state government revenue... it's time to regulate the building and strata living industry and home developers to account! Stop making the lives of people who work hard for a living hard and create nice spaces for those who pay ridiculous mortgages to live in these areas.

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:33 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** friends-of-erskineville-x-paint-shop-precinct.pdf

Submitted on Thu, 25/08/2022 - 22:32

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

# **Name**

#### First name

Andrew

#### Last name

Chuter

I would like my submission to remain confidential

No

# Info

### **Email**

### Suburb/Town & Postcode

Erskineville 2043

### Please provide your view on the project

I object to it

### Submission file

friends-of-erskineville-x-paint-shop-precinct.pdf

### **Submission**

see attached

### I agree to the above statement



Friends of Erskineville
PO Box 137
Erskineville 2043
friends@friendsoferskineville.org
www.friendsoferskineville.org

25 August 2022

### Paint Shop sub-precinct rezoning proposal

The Friends of Erskineville objects to this planning proposal.

This proposal is a large-scale privatisation of precious public land. In this regard it is not dissimilar to the failure of Barangaroo or the Australian Technology Park, both huge losses to the people of NSW.

At a time of housing crisis, this land should be used for public housing and public spaces that respect the precinct's unique heritage.

Our community has also been ignored in our collective demand for an active transport bridge across the tracks from Carriageworks to South Eveleigh, despite over 750 people sending letters to the Minister for Active Transport, fully supported by the City of Sydney council and three local resident groups. (See: <a href="http://www.actionnetwork.org/letters/build-a-bridge">http://www.actionnetwork.org/letters/build-a-bridge</a>)

The NSW government promised this bridge 15 years ago and has since been collecting developer contributions that were legally required towards it.

As an inner city precinct, this development cannot work without improvements to active transport, otherwise the increasing density will just result in worsened road congestion. Also with the opening of Waterloo Station there will be large numbers of students needing to walk from there to Sydney University which is an impractical distance if having to traverse through Redfern Station.

These plans should be rejected and the NSW government must hold an open dialogue with the people of South Sydney to determine the way forward to best use this public space.

#### **Andrew Chuter**

President | Friends of Erskineville

E friends@friendsoferskineville.org

From:	Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au></noreply@feedback.planningportal.nsw.gov.au>
Sent:	Thursday, 25 August 2022 9:33 AM
To:	DPIE PDPS Redfern North Eveleigh Mailbox
Subject:	Webform submission from: Paint Shop sub-precinct rezoning proposal
•	
Submitted on Thu, 25/08/2022 - 09:3	3
Submitted by: Anonymous	
Submitted values are:	
<b>Submission Type</b> I am making a personal submission	
Name	
First name Julia	
Last name Munro	
I would like my submission to rem No	ain confidential
Info	
Email	
Suburb/Town & Postcode Darlington 2008	
Please provide your view on the p I object to it	roject
Submission Planning Submission Documentation Submission from a resident of W	n - North Eveleigh Paint Shop Proposal /ilson St
I am writing this submission as a long North Eveleigh PaintShop Proposal.	g-time resident of Wilson Street Darlington NSW 2008 (Wilson Street) regarding the
apartments at Wilson Street, and	osed rezoning and redevelopment of the North Eveleigh PaintShop site. There are different three sides of our property border on the proposed rezoning area. Based on the current resin will be significantly and detrimentally impacted as a result of this
The concerns I have are as follows:	
A. Impact on the structural integrity of	f Wilson Street

1. As per the design guide, buildings F, K2, L1, K1 and P are all new buildings to the area and are in close proximity to 501 Wilson Street. I have concerns that the increase in allowance of building height from the current permissible heights, and the impact of the construction of these oversized buildings, may have on the structural integrity of 501 Wilson Street.

- 2. The Noise and Vibration Assessment report is basing the construction impact from a 2008 report that only considers buildings that directly back onto the rail lines, and do not consider the quadrupling of the height of the buildings submitted in this re-zoning proposal.
- 3. Comparable buildings of a height of up to 128m require deep excavation which has clearly not been considered in the current proposal. I object to the increase in building heights to their current levels of buildings F, K2, L1, K1 and P on the basis that these buildings are likely to have direct negative consequences on the structural integrity of 501 Wilson Street. I believe the current allowable building heights as per the current zoning is adequate to allow for a full regeneration of the area in line with the design guidelines in a way that is also unlikely to have such a dramatic effect on the surrounding residences.
- 4. I also note that no assessment has been completed with respect to the rezoning of the potential impact of construction vibration to adjacent buildings, nor is this required to be considered as the design guidelines do not have this as a requirement. Any future works should also consider the construction impact on the immediate surrounding dwellings.
- B. Height of buildings are inappropriate
- 5. The height and storey restrictions of the proposed buildings are entirely inappropriate for the area and are not in line with the area's status as a conservation area. The scale of the buildings K2, L1, P, K1, E1, E2 and possible addition above the Paint Shed is excessive, against the design principles and not in keeping with the character of the area.
- 6. I refer to the Public Domain, Place and Urban RNE Design Masterplan which in section 5.1.2. referred to the Innovation Precincts Building Typologies and stated that there are "tall buildings in successful districts setting precedent for height' however, the comparable buildings referred to were significantly smaller in both actual height and number of storeys than is being proposed in this re-zoning, specifically the Foundry in South Eveleigh is six storeys and the Sydney University Business School is seven stories. If these buildings are the height precedence for the area, all building heights in this proposal should be reduced and no change in the current allowable building heights should occur.
- 7. Current building heights on Wilson Street are no more than 12 meters. This proposed re-zoning is allowing for buildings to be built up to 58.2m on Wilson Street, and up to 128.8m on buildings behind Wilson Street. This scale is not appropriate for the area and current height restrictions should remain on the entire site.
- 8. The maximum height of buildings on Wilson Street being 58.2m is not appropriate for a conservation area that is currently a primarily residential street, and is not in line with the current residence design of terrace housing and low-rise set-back apartment buildings. The vision of the North Eveleigh re-zoning is for the new buildings to be built positively into the surrounding urban fabric. This will not occur if the development occurs at its proposed building height limits. It will be a clear and obvious eye-sore that does not integrate into the area and will become a blight on the landscape for all current residents.
- 9. Further to this, the statement that the proposal's built form "will provide an appropriate transition from the low rise and fine grain scale of Wilson street, industrial scale and texture within the curtilage of the robust industrial Paint Shop to taller articulated tower structures closer to Redfern Station" is factually incorrect and clearly does not allow for a seamless integration between small terrace housing and low-rise apartments by allowing for buildings of up to 58.2m on Wilson Street, and 128.8m towers behind. This proposal dwarfs all existing structures on Wilson Street and is not considerate of the heritage and community. Residents see the proposed building heights as grossly excessive and will result in monstrous constructions that will overpower the neighbourhood.
- 10. This proposal of building heights of up to 128.8m is not in line with recent development in South Eveleigh, or the Carriageworks and the design principles should be extended to consider the impact on these buildings and sub-precincts. The re-zoning should only allow for heights that are similar to what has been approved and constructed in South Eveleigh and Carriageworks to continue the appropriate design that has been successful in these areas.
- 11. The current floorspace ratio of 2:1 should also remain, and not be increased to the proposed level of 2.78:1 and all open space removed from the allowable floor space ratio for development to ensure that the buildings & development plots do not get floor space that would be deliberately imbalanced against the entire site.
- 14. Importantly, the height of the proposed building will reduce light into many of the apartments in 501 Wilson Street as discussed further in Section E below. This will breach the owners and tenants' rights to enjoyment of their property. Light is essential to wellbeing.
- 15. The height will also dramatically alter the views from many of the apartments facing South Eveleigh. This will breach the owners and tenants' rights to enjoyment of their property. I disagree with 3.4 View Place Sensitivity in the Visual Impact Assessment report that the views on the immediately surrounding streets would not have a negative visual impact if the proposed built form is built, as there would a loss of a view of the skyline, open space and the heritage buildings in this sub-precinct and the South Eveleigh precinct. Further, a view of monstrously high and overpowering sky-scrapers is an entirely inappropriate replacement for existing enjoyable views. Section 3.5 in the Visual Impact Assessment report states "south-facing units at [501] Wilson Street that projects into the site will be exposed to potential views from the site" and I disagree with the statement that the views that would be lost would not be "views of high scenic quality, iconic views or access to views of individual icons." These south facing apartments have views of all heritage buildings in this precinct, the South Eveleigh heritage buildings and have wide ranging enjoyable sky-line views. The deliberate exclusion of these residences from the view-loss analysis is inappropriate and if included would suggest that development of this scale and height should not proceed as the views of the proposed form would be highly unpleasant.
- 16. The sky-view assessment also does not measure the sky-view impact that residents of 501 Wilson st would experience as a result of this development. Based on the height and proximity of the proposed developments, it is likely that most apartments in 501 Wilson st will lose most, if not all, of their sky-view and the loss will exceed City of Sydney requirements, This together with the

exclusion of the 501 Wilson st from the Visual Impact Assessment report is incredibly concerning and the development scale should be re-considered.

- C. Building and street set-back against 501 Wilson St
- 17. Section 5.1.7 of the Public Domain, Place and Urban Design Masterplan outlines that there is a requirement of adequate building separation distances of:
- 12m set-back against a maximum 4 storey development
- 18m set-back against a maximum 8 storey development
- 24m set-back against a 9+ storey development.

The design guidelines do not mandate that this set-back must occur for any building that is built near 501 Wilson Street.

- 18. In the current proposal the floor plate and allowable development space of Building F is right up to the property boundary of 501 Wilson Street, therefore this re-zoning in its current state allows for a 5 storey building to be built to the boundary of 501 Wilson Street.
- 19. Buildings K2 and L1 have a maximum allowable number of storeys as 26. The current layout and spacing between K2, L1 and 501 Wilson Street does not provide a 24-meter separation.
- 20. Therefore, this current design guidelines and re-zoning proposal is inadequate to meet the requirements of building separation. Without adequate set-back 501 Wilson Street residents will be adversely affected by this development and will lack appropriate privacy and security protections.
- 21. I am proposing that the mandated set-back area against 501 Wilson Street be re-zoned as recreation zoning and be used as parks and safe play space for children and families of the area. This would be in line with community expectations of an outdoor life and enhances wellbeing. This approach would also be similar in nature to other small family friendly parks in Newtown, Erskineville, Alexandria and Redfern.
- D. Shared road directly behind 501 Wilson Street
- 22. The proposal outlines that a shared road be built immediately behind 501 Wilson Street apartments. According to the design guidelines the road will directly abut 501 Wilson Street apartments, specially the bedrooms and living spaces of 20 apartments. This road would be considered a public roadway and does not provide a minimum setback in line with Government Requirements of 3m for rear setback controls. It would not be appropriate to have zero set-back against 501 Wilson Street.
- 23. If an adequate set-back is not provided, the design guidelines fail to provide adequate separation of people's homes, leading to a lack of visual privacy, lack of recognition that residents of 501 Wilson Street require privacy, lack of security for the building, and increases noise pollution from pedestrians and vehicles due to the street's close proximity.
- 24. Residents of 501 Wilson Street will not be afforded the opportunity anymore to peacefully enjoy our homes. Residents have had peaceful enjoyment of their homes for over 30 years and object to this being taken away from us.
- E. Solar impact of the development against 501 Wilson Street
- 25. The proposal allows for building F to be built up to 54m, and buildings K2 and L1 to be built up to 128.2m.
- 26. The design guidelines fail to consider the solar impact and loss of light that would occur to 501 Wilson Street if the current rezoning application is approved. Building F would provide significant afternoon shadow onto 501 Wilson Street. Buildings K2 and L1 would block all direct sunlight that the southern side of 501 Wilson Street receives. The apartments at the rear of 501 Wilson Street are south facing and are already vulnerable to loss of adequate sunlight, and the construction of 28 storey buildings immediately behind our residences would have a huge impact and block virtually all sunlight to those homes. In summary, the majority of the south side residents would lose all of their natural light and significant overshadowing of the entire building would occur.
- 27. The design guidelines fail to meet the solar access requirements for 501 Wilson Street based on the increased building height. If the current height restrictions of the site and building separation design were kept, 501 Wilson Street would retain adequate solar access.
- 28. The recommendation is that the building heights are not increased from their current state to the current re-zoning height requests on the basis of solar access for 501 Wilson Street being in contravention of legal solar access requirements.
- F. Radiant heat impact on 501 Wilson Street from buildings F, K2 and L1
- 29. The rezoning proposal has buildings K2 and L1 constructed as north facing buildings, with glass as the primary external construction material.. By using glazed glass as the primary external construction material for north facing buildings there will be an extreme radiant heat impact onto 501 Wilson Street. Light and thermal heat will be deflected from these new buildings onto 501 Wilson Street thereby trapping heat at street level next to our homes. Building F being in such close proximity will only exacerbate the radiant heat impact on 501 Wilson Street.
- 30. The glass tower buildings will have a detrimental impact on the urban heat island effect, and increase temperatures on surrounding residential sites including 501 Wilson Street. This would occur by radiant heat being reflected and deflected onto surrounding residences. One of the design guidelines is to supposedly reduce the current Urban Heat Island Effect of the area. Based on this proposal, the heat island effect on surrounding residences is more likely to increase than decrease as a result of the

re-zoning. Further, the radiant heat on the surrounding residences would increase building temperature which would result in residents being forced to increase their air conditioner use to provide a comfortable temperature within their homes. Increased air conditioner use is in contradiction to the proposal's aim to have a positive impact on climate change and make progress towards the NSW Governments net zero 2050 target. Therefore, this design is in breach of the design guidelines.

- 31. Consideration should be given to height reduction of buildings K2 and L1 that would lead to a reduction in the urban heat island effect.
- G. Active street frontages on precinct and impact on 501 Wilson Street
- 32. The design guidelines have outlined active street frontages, and the location of new retail and hospitality venues at those street fronts. The southern side of building F has a 0m ground level set-back, which is the same set-back that the southern side of 501 Wilson would have. These zonings do not consider the privacy, noise, traffic, light, security and safety impacts to 501 Wilson Street by having active street frontages against ground level apartments and residents' bedrooms.
- 33. The design guidelines and current re-zoning are not fit for purpose and do not meet the residents' expectations of peaceful enjoyment of their homes if active street frontages without a set-back be introduced in all surrounding buildings.
- H. Precinct entrance at Shepherd St, Ivy Lane and Little Eveleigh Street
- 34. The introduction of new access points off Shepherd St and Ivy Lane and Little Eveleigh Street are inappropriate and create a major safety hazard for pedestrians and cyclists on Wilson Street. All streets surrounding the Paint Shop sub-precinct are quiet residential streets that get greater foot and cyclist traffic than vehicle traffic.
- 35. The recently completed cycleway along Wilson Street forms part of the City of Sydney's Cycling Strategy and Action Plan, and is used by countless cyclists every day.
- 36. To have the entry to the proposed precinct cross this cycleway is unsafe and contradicts the City of Sydney's masterplan to provide a safe cycling network across the city. Having the entrance and exits onto this precinct via narrow residential streets crossing busy pedestrian and cycleways, without consideration of safety is irresponsible and an example of poor planning.
- 37. Other access points should be considered for the primary access, including linking up to the existing Carriageworks Way to ensure vehicle traffic does not create safety hazards by crossing pedestrians and bicycle pathways.
- 38. An approach similar to the entrance constructed on the South Eveleigh site onto Mitchell Rd and Henderson Rd is appropriate as there are existing main roads with traffic lights that could accommodate an increase in vehicular traffic. Wilson Street, Shepherd St, Ivy Lane and Little Eveleigh St cannot accommodate this. It is inappropriate to make these major site access points off minor quiet residential streets.
- 39. Further, consideration should be given to the extra 10,000 pedestrians that are expected to be walking down Little Eveleigh St, Wilson St, Shepherd Let, Ivy St, Ivy Lane and Codrington St each day as a result of the Southern Concourse construction at Redfern Station, the introduction of the Waterloo station and the potential increase of pedestrians once all students return to face-to-face learning. This proposal should be considered against the Southern Concourse construction and pedestrian movements.
- I. Inadequacy of traffic and noise studies undertaken wrong area of Wilson St
- 40. The traffic and noise studies that support this rezoning application are inaccurate, and in the instance of a traffic study non-existent. The design guidelines are therefore based off deliberately missing or misleading information.
- 41. I refer to the Noise and Vibration Assessment Study where it states that no traffic studies were undertaken, and therefore the assumptions on current vehicle trips of 350 during the AM peak hour are invalid and not appropriate to use as a reference point. The report equally does not consider the traffic impacts on bringing a major precinct access point into the quietest end of Wilson Street (between Shepherd St and Ivy St) that currently has the least amount of traffic. This area is likely to experience a significant increase in vehicle traffic if the re-zoning goes ahead and is not in line with community expectations of a quiet residential street.
- 42. Considering that the assumption on current vehicular use of Wilson Street is invalid. The assumption that the AM peak hour trips would only increase to 520 trips and would have a negligible impact by increasing noise by <2dB(A) is also invalid. My view is that there would be a significant noise and vehicle trip increase during all times of the day and night as a result of this proposal.
- 43. The proposal also does not consider the impact on vehicular trips outside of peak hours that would increase as a result of the zoning to make this a "24-hour" precinct that allows late-night venues. A further traffic assessment that considers the impact of introducing restaurants, bars, cafes and late night venue traffic and bringing this traffic onto a quiet residential street is essential in order to adequately consider the traffic noise impact.
- 44. In the current form it is likely that residents of Wilson St will get a significant increase in traffic noise at all hours of the day, which does not allow for peaceful enjoyment of our homes. This will be particularly noticeable to the residents on the southern side of 501 Wilson Street whose bedrooms will abut directly onto a major access road, where there will be traffic at all hours.
- 45. With the expectation that over 700 residents and 6000 workers will be in the area every day, along with "visitors" to the retail, hospitality and community facilities there will be more noise impacts than currently outlined. The design principles are inadequate in relation to traffic noise, and if they were adequate would not support a development of this size being inserted into a residential area.

- 46. The traffic noise plans also do not account for the volume of waste management services that will be required to service the site
- 47. The road traffic noise intrusion assessment that occurred out the front of 418 Wilson St on June 16 July 7 2021 states recorded traffic noise is 53dB(A) during the day and 46dB(A). The area selected for the road traffic noise intrusion assessment is inappropriate as it is not the part of Wilson St that will be most affected by road traffic noise. The assessment should have occurred on Wilson St between Shepherd St and Ivy Lane.
- 48. I also note that the Noise and Vibration Assessment Study sates that the noise is unlikely to impact the proposed new residential buildings, but nothing is recorded on the impact on the current residential dwellings. This suggests to me that their deliberate exclusion from this report would mean that noise levels would be detrimental to current dwellings. Therefore, the design guidelines and rezoning are inappropriate on the basis of traffic noise impact to existing residents.
- 49. The noise controls are also not adequate for a residential area where construction of a site is expected to last 8-10 years. The proposal allows for construction to begin at 7:00am, whereas City of Sydney recommends a start time of 7.30am in residential areas.

### J. Noise pollution

- 50. Considering the re-zoning request is as broad as could possibly be and allows for late night venues, live music venues and outdoor events to occur within the precinct, no consideration has been given to the long term noise pollution that would occur as a result of this zoning change and increase in density of the area with over 7000+ people in the area each day.
- 51. The southern side of 501 Wilson Street will be most detrimentally impacted as a result of the zoning changes and lack of reasonable noise controls, and volume of people due to having commercial, retail and hospitality venues directly opposite and beside people's apartments.
- 52. The noise of people entering and exiting buildings F, K2, P and L1 each day, along with the option to use the outdoor space for commercial purposes without adequate noise controls will create permanent ongoing harm for residents in 501 Wilson Street. The re-zoning should not allow for the increase in density nor the increase in the floor space ratio on the basis of the potential permanent unacceptable noise levels that would be inflicted on the residents of 501 Wilson Street 24/7.
- 53. The Noise and Vibration Assessment Study in 'Table 13' outlines the project amenity noise; however, fails to consider the cumulative noise impacts of the entire site, including outdoor pedestrian noise from 7000+ people in the site every day on the surrounding area. This would significantly raise the noise levels surrounding existing dwellings and residents. There is no consideration for the detrimental health impacts noise pollution can cause, such as hearing loss, headaches, fatigue, high blood pressure, heart disease, sleep disturbances, stress and mental health issues. This needs to be considered from both a permanent perspective once the development is completed and for the 8-10 years of construction noise that residents would suffer through whilst it is being built.
- 54. On the basis of noise pollutions impacts to residents in existing dwellings, especially 501 Wilson Street, the entire site should not be re-zoned for mixed use at the proposed density. There should be dedicated zoning around existing residences, such as, recreational zoning that reduces the harm permanent noise pollution could cause.

### K. Light pollution

- 55. In the current design guidelines a request to increase the allowable height of buildings K2 and L1 to 128.2m and building F to 54m. K2 and L1 are designed for the exterior to be made out of entirely glass and used as office buildings. No impact assessment from a light pollution perspective has been undertaken on surrounding residences, including 501 Wilson Street to demonstrate the impact of placing two glass buildings immediately behind residences.
- 56. Most office buildings keep their lights on at night and this will cause significant light pollution from glare, light trespass, and clutter (grouping of lights that collectively generates too much light at night) to the southern facing residents of 501 Wilson Street, and all other southern facing residences on Wilson St, and Wilson Lane with lights glaring all night into residents' living rooms and bedrooms. I disagree with the Pollution Assessment report that the lighting from the buildings on Wilson Street will be "unlikely to affect the neighbouring properties." Further this Pollution Assessment report states that the proposed buildings on the southern perimeter of the site "facade/outdoor terrace lighting may affect the rail corridor." It is worth noting that the impact of this light on 501 Wilson Street, and all other residences in the area has not been studied, even though these residences will be exposed to the same amount, if not, more light than the rail corridor due to the proximity of these developments and the active street frontages facing 501 Wilson Street apartments.
- 57. The significant light pollution that would occur as a result of this development does not consider the adverse health impacts on existing residents including: sleep deprivation, fatigue, stress, headaches, anxiety, reduction in melatonin production and current medical research that indicates a potential link between artificial light and cancer.
- 58. The re-zoning should not allow for the height of the K2 and L1 buildings to create such significant light pollution, and the current height restrictions for the precinct should remain in place.
- L. Inadequate provision of housing suitable for multi-person homes including families (Apartment Mix)
- 59. The design guidelines refer to studies and recommendations that state that most apartments in the area are for single person households and that the expectation that lone person households are the group that is expected to have the greatest increase in demand for housing. However, this fails to recognise that families and multi-person households are unable to find suitable housing

in the area and are therefore being forced to leave due to inadequate provision of housing suitable to their needs. The design guidelines and apartment mix (9.5.13) fail to address this need by setting a minimum requirement of 40% of 1 bedroom or studio apartments. Minimum limits on 3 and 4 bedroom apartments should be increased to provide adequate housing for families and multi-person homes.

- 60. The design guidelines refer to "diverse housing," however a clear definition of "diverse" is not provided. The 30% target should not be left open to interpretation to a developer as to what "diverse" means, as this could potentially then continue to fail to address the housing crisis facing the area. "Diverse" housing leaves open the opportunity for a minimum of 15% of all housing to be student housing, which is not required to have as high building, design and apartment fit out standards as residential apartments. Increased student housing in an area where there is already adequate student housing is unnecessary and fails to address the core housing crisis in this LGA.
- 61. The Social Infrastructure Study and Health Impact Assessment report also states that "more than 5000 City area residents were living in severely crowded dwellings, temporarily with other households" along with homelessness. The current design guidelines fails to address the lack of appropriate sized dwellings for multi-person households and the urgent need to increase social housing. Further, by all housing in this development being privatised it will exacerbate housing affordability problems in the LGA. This same report also states that "international evidence has shown that innovation distractions are known to reduce housing affordability and displace many lower-income earners and long-term residents." With this in mind, the design guidelines and rezoning should be radically re-thought to ensure that there will be no adverse impact on the areas most vulnerable residents and long-term positive housing solutions for these residents be incorporated.
- 62. The design guidelines and re-zoning change request do not meet community expectations regarding the lack of social housing, and the lack of definition of "diverse housing." Further, without guaranteed housing for First Nations the design also does not meet community expectations.
- M. No guaranteed open space or recreational area
- 63. The request to re-zone the entire site as mixed-use, without guaranteeing that the areas in the plan listed as "open space" be zoned as "recreational area", demonstrates that there is an inherent failure in the re-zoning request to meet the design guidelines of "great public space." If the entire site is "re-zoned" as mixed-use with the proposed density and floor space ratio there is no guarantee that the spaces marked as "open-space" will actually be open space. It would allow the developer to put buildings on and commercialise the open space for their benefit. Appropriate zoning of "recreational area" should be applied to these spaces to guarantee that they can only be used for recreation.
- 64. Using recreation area zoning would also be in line with the South Eveleigh development where recreational area zoning is applied and parkland and sporting facilities are quaranteed for the community.
- 65. Further, by using a lower level planning document the design guide to say where the floor space should go rather than allocating it building by building provides greater flexibility for the developer who purchases the site, and no certainty for the community. By using this design guide over a more appropriate planning document for a site of this scale it is likely that the developers plans will deviate significantly from these guidelines and be more likely to have a more extreme impact on the community and existing residences.
- 66. Further to this, according to 5.1.3 in the Context Analysis, it is stated that there is a void of open space within a 500m radius of the development, and a general deficit of sporting and recreation facilities in the area. It also notes that the available open areas are very small and any increase in density requires a proportional increase in open space. If this development is to bring in what is a likely 10-fold increase of people into the area each day a significant increase in guaranteed open spaces, sporting facilities and safe play areas for families is absolutely essential.
- 67. Due to the lack of zoning of recreational areas in the Paint Shop sub-precinct the design guidelines and zoning is totally inadequate in addressing the Context Analysis and the deficit of appropriate outdoor spaces for the community.
- 68. The proposed "open-spaces" does not provide safe play areas for children, especially children with disabilities and mobility issues, and there is no provision for community sporting and recreation facilities. There is also no provision for public amenities such as toilets.
- 69. The Social Infrastructure Study and Health Impact Assessment report states that a key consideration to improve the health and wellbeing of the area should be "greening the urban environment to support community wellbeing." Without guaranteeing green space through zoning of appropriate recreational areas the development will fail to improve the overall health and wellbeing of residents. It is worth noting that this same report states that the levels of mental health distress in this local government area is higher than other areas, and the lack of appropriate green and outdoor space in this area. There is a significant body of scentific research which demonstrates that lack of green outdoor space has detrimental affects on mental health, such as higher levels of mental distress, higher stress levels, higher levels of anxiety & depression and higher levels of disease prevalence for both adults and children. Adequate provision of green space needs to be provided in this development, to ensure that an improvement in community health outcomes can be made and the health of the children in the community can be protected.
- 70. My recommendation is that K2 and L1 be rezoned as recreational areas and have purpose built sporting and safe play areas built for children. This would still allow for appropriate development to occur on the site, be best connected to the new apartment sites whilst also providing an adequate level of safe spaces for children, families and all residents to use and in keeping with the expectation of an Australian outdoor lifestyle where everyone is able to participate in outdoor sports and pursuits, and meet the design guidelines and renewal principals in full. This will also improve the health and wellbeing of the community, in line with the need outlined in the Social Infrastructure Study and Health Impact Assessment report.

- N. Inadequate definition of and provision of community and cultural space
- 71. The design guidelines outline a renewal principal of a "great place for the community;" however, the current rezoning proposal will not be an inviting space that will draw people in. Rather it will be a total monstrosity and blight on the landscape which is fully commercialised.
- 72. A fully commercialised space zoned as mixed-use inherently means low income earners and those with no disposable income will never be able to enjoy or use the space. As such, this proposal is exclusionary of the most vulnerable Australians who could most benefit from community and cultural space. In addition, a fully commercialised space is not in line with community expectations and needs. The design guidelines only mandate that 1.6% of the gross floor area is required to be community space, and as the community space will be in the developer's private hands there is no guarantee that the community will ever be able to access these spaces. No provisions have been made to ensure that First Nations health or community spaces will be provided, and this is not in line with the Connecting with Country framework
- 73. Further, the current definition of "community use" includes commercial uses such as run-for-profit childcare centres, which is inappropriate and not in line with the definition of "community use."
- 74. The design guidelines allow for 72.2% commercial use, and only 1.6% for community and cultural use. There is an inadequate provision of guaranteed community and cultural use space in public ownership.
- 75. The design guidelines should increase the amount of community space and mandate that they remain in public ownership to ensure they are protected from commercial interests.
- O. Heritage impacts and lack of coherent identity
- 76. The design guidelines state that this rezoning proposal will "respect the past, adaptively re-use heritage buildings in the precinct and will acknowledge Redfern's existing character" and "building positively to its surrounding urban environment."
- 77. The proposal does not respect the past, and nor does it provide respect to the heritage buildings and character of the area. The area is a heritage conservation area and modern-skyscrapers which tower over and dwarf the entire area which has a negative impact on the surrounding environment and the people who live in neighbouring areas can in no way be construed as positively impacting the locale.
- 78. The Paint Shop are seen as buildings of significant heritage value, primarily as a result of the unique roof. The current proposal shows that a building of up to 63.6m can be placed anywhere above and over the entirety of the building. Doing this would ruin the heritage of the Paint Shop and not allow anyone to enjoy the unique heritage of the building. The rezoning should not allow for a building to be placed above the Paint Shop.
- 79. It is worth noting that the design guidelines are entirely inadequate to protect the heritage of this building as there is no information on how much of the Paint Shop could be covered by the building and how much floor space would be in the subsequent tower over the top of the paint shop, and this can be changed by a future design excellence process.
- 80. It is also concerning that the Paint Shop is the only existing heritage building in this proposal that its existing height and structure is not protected.
- 81. The design guidelines also state that this proposal will facilitate a "coherent identity." Upon reviewing the detail in all of the supporting documentation, I disagree that a coherent identity will be facilitated. The current proposal allows for the destruction of and minimisation of the existing heritage value and character and does not provide an identity that is line with community expectations.
- P. Make the Paint Shop sub-precinct Australia's largest multi-arts centre
- 82. The renewal principals outlined in 'Table 2' in the planning report outlines that a key renewal principal of the site is for the Paint Shop sub-precinct to become "Australia's largest multi-arts centre", however, there is no requirement in the design guidelines that dedicated arts facilities be provided.
- 83. What is outlined is that of the minimal 1.6% community and cultural space, 1000sqm of this space be available for creative and cultural use which could be occupied by commercial tenants, such as private media broadcasting companies like Foxtel, that meet an intentionally broad definition of "creative."
- 84. This goes against the renewal principals and community expectations around multi-arts centres. The standard definition of a multi-arts centre is that there be public space that fosters innovation and creativity, and also allows art to be exhibited and cultural events to be run.
- 85. These spaces should be major cultural destinations that have the potential to attract national and international artists. These types of spaces are not suited to commercial ownership. In the rezoning proposal with the deliberately broad definition of "creative" that is open to interpretation by the developer. Therefore, the design guidelines and current rezoning proposal fail to deliver a multi-arts space for the community.
- 86. There should be a development plot that, like the Paint Sheds plot of H, that is publicly owned for the arts.
- Q. Length of construction 8-10 years

- 87. The supporting technical documentation for the rezoning proposal of the Paint Shop sub-precinct notes that if the proposal were to go ahead in its current state development would take 8-10 years before completion. The design guidelines state that the proposal should improve the mental health of residents. I strongly object to this.
- 88. In no scenario does 8-10 years of constant construction and development improve mental health outcomes of any resident in the area. If anything, it will have detrimental health outcomes on all residents in the area from the air and dust pollution from the development, constant construction noise and construction traffic noise, disruption and damage to our residences.
- 89. The Pollution Assessment report states that there will be air pollution expected as a result of demolition, excavation and construction works and would be considered "temporary." I disagree with the view that this level of pollution is temporary as construction is expected to last for between 8-10 years, this level of increased pollution can result in irreversible negative health impacts. The health impacts of construction generated pollution are incredibly serious (e.g. respiratory illness, cardiovascular disease, reduced lung function in children, and links to early onset dementia), and the development control measures outlined are entirely inadequate.
- 90. This development will occur in a quiet residential area and permanently change the lives of all of the residents, including their children who from a young age will experience the adverse impacts of major developments on their lives.
- 91. The rezoning proposal should not go ahead in its current state to ensure that residents do not experience the harmful effects of 8-10 years of constant major development.

#### R. Wind tunnel effects

- 92. I refer to the Pedestrian Wind Environment Study for Redfern North Eveleigh where it states that "the wind conditions for the majority of the traffic able outdoor location within and around the Paint Shop sub-precinct will be suitable for their intended effect."
- 93. As the study did not test wind impacts to the full-extent of the allowable building height, size, and number of buildings that could be built under the design plan, the results of this study are invalid.
- 94. The proposal does state that there are localised areas within the precinct which would exceed the assigned comfort criterion and could be managed by mitigation measures. However, since testing has not been done to the design guidelines full allowances there is no guarantee that more of the development area would exceed the comfort criterion and whether they could be adequately managed, or whether consideration needs to be given to the new buildings overall height and close proximity to ensure no wind tunnel effects occur.
- 95. As the areas that are likely to exceed the comfort criterion are out the front of the K2 building, and directly opposite the southern side of 501 Wilson Street, the wind tunnel effects are likely to also adversely impact peoples' enjoyment of their own apartments and outdoor space that is in close proximity to K2. A reduction in the scale of K2 and greater separation between K2 and 501 Wilson Street should occur to ensure existing residents of 501 Wilson Street are not impacted by a wind tunnel, and unable to have peaceful enjoyment of their home.

### S. Climate Change

- 96. One of the objectives of the proposal is to support the government aims to get to net zero emissions by 2050. If the government did genuinely want to get to net zero emissions by 2050 the proposal would not include the development of five skyscraper buildings and three other excessively high buildings.
- 97. Current scientific research is clear on the impacts skyscrapers and overly tall buildings have on climate change none of them are positive. The embodied-carbon levels and operational-carbon levels of skyscrapers are not environmentally friendly and a major contributor to climate change. Most research suggests that high-density low-rise developments and cities are more environmentally friendly than high-rise high-density developments and cities. As such, consideration should be given to updating the re-zoning proposal, and building heights to ensure that the area becomes low-rise high-density. Further, consideration needs to be given to guaranteed green space that is accessible and useable for both the community and native flora and fauna.
- 98. A revised re-zoning proposal would be more effective in making progress towards the NSW Governments net-zero 2050 target.
- T. Overall comments on the proposal and private ownership of the land
- 99. This proposal very clearly demonstrates that a lack of community consultation has occurred and community and environmental needs have obviously not been considered. The sale of this land is clear to all members of the community that this is a money grab by the NSW Government. The re-zoning is to be as broad as possible, and offers no guarantees that any land be public open space. This is most concerning and incredibly disappointing.
- 100. The government has the opportunity to be at the fore-front of designing for the future in a climate and community friendly way that would be seen as progressive and world-leading if a different view was taken with this proposal. The government has the opportunity to regenerate this under-utilised open space and turn it into a much-needed housing and green recreational safe play, and sports area that meets the needs of the community by the land remaining in public hands. It might not return the cash to the government; however, the benefit to the community would be priceless. There would be measurable positive impacts to community health and social outcomes if the proposal was significantly altered to include and mandate recreation, and community space, as well as, a reduction in building height.

# I agree to the above statement Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 9:22 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 09:21

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Michael

#### Last name

Radojkovic

I would like my submission to remain confidential

Nο

# Info

# Email

### Suburb/Town & Postcode

Darlington

### Please provide your view on the project

I object to it

### **Submission**

Hello,

I have attached a file as a submission drafted by the strata committee of Wilson Street and I strongly object to this re-zoning proposal.

As a owner of an apartment at Wilson Street, I am attracted the history and community feel of the area, which although close to the city, feels suburban in nature and has always retained a sense of home and place.

This proposal is completely against what the area feels like and will bring in a multitude of office workers to a very small area that cannot sustain it.

Needless to the say, our apartment block would be adversely affected by light, noise, traffic and pollution and the peaceful enjoyment of our residence will disappear.

The submission attached covers all of the aspects that I believe need to be considered.

This area cannot support this kind of development and the roads and pedestrian walkways in the area will in no way be able to handle the traffic.

Our apartment's bedroom back onto the rail corridor and whilst we are only 80 metres from the tracks, we enjoy the peaceful, but regular train sounds. The construction work and hub that have been built in this space has already been disturbing us for some time, but we deal with it because it is for a finite time.

This development and the huge construction times would significantly affect our peaceful living in this apartment and we have already reached out to NSW government for compensation for the extreme noise that can be generated behind our apartment.

The excavation and construction of the large building behind our property would generate unacceptable noise, dirt and pollution for the area, needless to say that the finished product would be an absolute eye-sore and not in fitting of the historic context of the area.

This submission must be re-considered and scrapped and begun again with community and heritage consultation from the start before proposing a blight on the area.

Thank you, Michael Radojkovic

I agree to the above statement

# Planning Submission Documentation - North Eveleigh Paint Shop Proposal Submission from a resident of Wilson St

I am writing this submission as a resident of Wilson Street Darlington NSW 2008 (WW Wilson Street) regarding the North Eveleigh PaintShop Proposal.

I have grave concerns about the proposed rezoning and redevelopment of the North Eveleigh PaintShop site. There are apartments at Wilson Street, and on three sides of our property borders on the proposed rezoning area. Based on the current re-zoning proposal all of the apartments in Wilson Street will be significantly and detrimentally impacted as a result of this development in its proposed form.

The concerns I have are as follows:

# A. Impact on the structural integrity of Wilson Street

- 1. As per the design guide, buildings F, K2, L1, K1 and P are all new buildings to the area and are in close proximity to Wilson Street. I have concerns that the increase in allowance of building height from the current permissible heights, and the impact of the construction of these oversized buildings, may have on the structural integrity of Wilson Street.
- 2. The Noise and Vibration Assessment report is basing the construction impact from a 2008 report that only considers buildings that directly back onto the rail lines, and do not consider the quadrupling of the height of the buildings submitted in this re-zoning proposal.
- 3. Comparable buildings of a height of up to 128m require deep excavation which has clearly not been considered in the current proposal. I object to the increase in building heights to their current levels of buildings F, K2, L1, K1 and P on the basis that these buildings are likely to have direct negative consequences on the structural integrity of Wilson Street. I believe the current allowable building heights as per the current zoning is adequate to allow for a full regeneration of the area in line with the design guidelines in a way that is also unlikely to have such a dramatic effect on the surrounding residences.
- 4. I also note that no assessment has been completed with respect to the rezoning of the potential impact of construction vibration to adjacent buildings, nor is this required to be considered as the design guidelines do not have this as a requirement. Any future works should also consider the construction impact on the immediate surrounding dwellings.

# B. Height of buildings are inappropriate

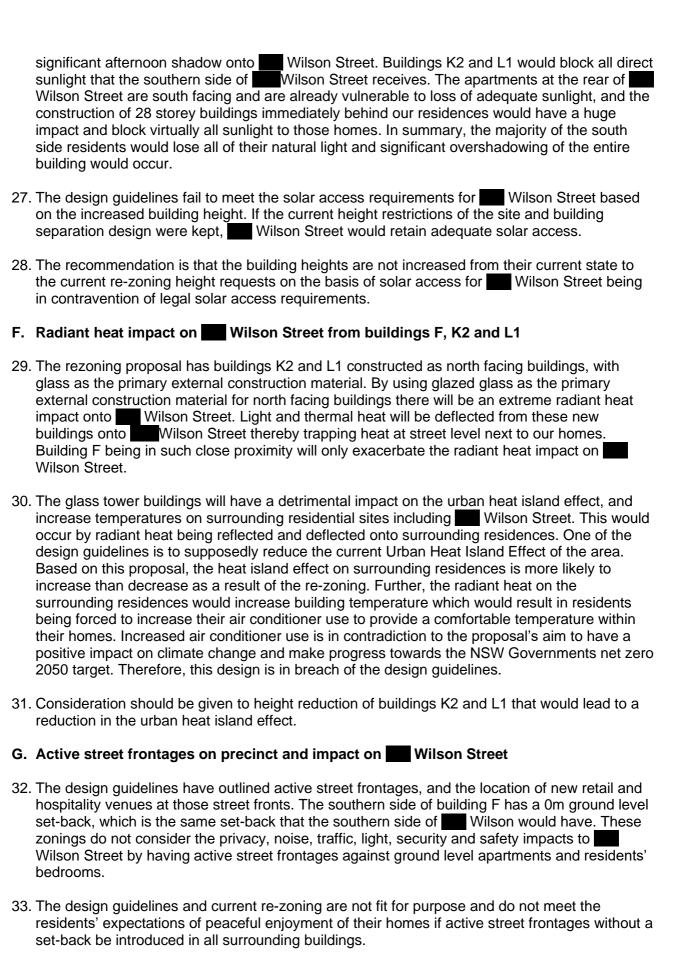
- 5. The height and storey restrictions of the proposed buildings are entirely inappropriate for the area and are not in line with the area's status as a conservation area. The scale of the buildings K2, L1, P, K1, E1, E2 and possible addition above the Paint Shed is excessive, against the design principles and not in keeping with the character of the area.
- 6. I refer to the Public Domain, Place and Urban RNE Design Masterplan which in section 5.1.2. referred to the Innovation Precincts Building Typologies and stated that there are "tall buildings in successful districts setting precedent for height' however, the comparable buildings referred to were significantly smaller in both actual height and number of storeys than is being proposed in this re-zoning, specifically the Foundry in South Eveleigh is six storeys and the Sydney University Business School is seven stories. If these buildings are the height precedence for the area, all building heights in this proposal should be reduced and no change in the current allowable building heights should occur.
- 7. Current building heights on Wilson Street are no more than 12 meters. This proposed re-zoning is allowing for buildings to be built up to 58.2m on Wilson Street, and up to 128.8m on buildings

behind Wilson Street. This scale is not appropriate for the area and current height restrictions should remain on the entire site.

- 8. The maximum height of buildings on Wilson Street being 58.2m is not appropriate for a conservation area that is currently a primarily residential street, and is not in line with the current residence design of terrace housing and low-rise set-back apartment buildings. The vision of the North Eveleigh re-zoning is for the new buildings to be built positively into the surrounding urban fabric. This will not occur if the development occurs at its proposed building height limits. It will be a clear and obvious eye-sore that does not integrate into the area and will become a blight on the landscape for all current residents.
- 9. Further to this, the statement that the proposal's built form "will provide an appropriate transition from the low rise and fine grain scale of Wilson street, industrial scale and texture within the curtilage of the robust industrial Paint Shop to taller articulated tower structures closer to Redfern Station" is factually incorrect and clearly does not allow for a seamless integration between small terrace housing and low-rise apartments by allowing for buildings of up to 58.2m on Wilson Street, and 128.8m towers behind. This proposal dwarfs all existing structures on Wilson Street and is not considerate of the heritage and community. Residents see the proposed building heights as grossly excessive and will result in monstrous constructions that will overpower the neighbourhood.
- 10. This proposal of building heights of up to 128.8m is not in line with recent development in South Eveleigh, or the Carriageworks and the design principles should be extended to consider the impact on these buildings and sub-precincts. The re-zoning should only allow for heights that are similar to what has been approved and constructed in South Eveleigh and Carrigeworks to continue the appropriate design that has been successful in these areas.
- 11. The current floorspace ratio of 2:1 should also remain, and not be increased to the proposed level of 2.78:1 and all open space removed from the allowable floor space ratio for development to ensure that the buildings & development plots do not get floor space that would be deliberately imbalanced against the entire site.
- 14. Importantly, the height of the proposed building will reduce light into many of the apartments in Wilson Street as discussed further in Section E below. This will breach the owners and tenants' rights to enjoyment of their property. Light is essential to wellbeing.
- 15. The height will also dramatically alter the views from many of the apartments facing South Eveleigh. This will breach the owners and tenants' rights to enjoyment of their property. I disagree with 3.4 View Place Sensitivity in the Visual Impact Assessment report that the views on the immediately surrounding streets would not have a negative visual impact if the proposed built form is built, as there would a loss of a view of the skyline, open space and the heritage buildings in this sub-precinct and the South Eveleigh precinct. Further, a view of monstrously high and overpowering sky-scrapers is an entirely inappropriate replacement for existing enjoyable views. Section 3.5 in the Visual Impact Assessment report states "south-facing units Wilson Street that projects into the site will be exposed to potential views from the site" and I disagree with the statement that the views that would be lost would not be "views of high scenic quality, iconic views or access to views of individual icons." These south facing apartments have views of all heritage buildings in this precinct, the South Eveleigh heritage buildings and have wide ranging enjoyable sky-line views. The deliberate exclusion of these residences from the view-loss analysis is inappropriate and if included would suggest that development of this scale and height should not proceed as the views of the proposed form would be highly unpleasant.
- 16. The sky-view assessment also does not measure the sky-view impact that residents of Wilson st would experience as a result of this development. Based on the height and proximity of the proposed developments, it is likely that most apartments in Wilson st will lose most, if not all, of their sky-view and the loss will exceed City of Sydney requirements, This together

	with the exclusion of the Wilson st from the Visual Impact Assessment report is incredibly concerning and the development scale should be re-considered.
C.	Building and street set-back against Wilson St
17.	Section 5.1.7 of the Public Domain, Place and Urban Design Masterplan outlines that there is a requirement of adequate building separation distances of:
	<ul> <li>12m set-back against a maximum 4 storey development</li> <li>18m set-back against a maximum 8 storey development</li> <li>24m set-back against a 9+ storey development.</li> <li>The design guidelines do not mandate that this set-back must occur for any building that is built near</li> <li>Wilson Street.</li> </ul>
18.	In the current proposal the floor plate and allowable development space of Building F is right up to the property boundary of Wilson Street, therefore this re-zoning in its current state allows for a 5 storey building to be built to the boundary of Wilson Street.
19.	Buildings K2 and L1 have a maximum allowable number of storeys as 26. The current layout and spacing between K2, L1 and Wilson Street does not provide a 24-meter separation.
20.	Therefore, this current design guidelines and re-zoning proposal is inadequate to meet the requirements of building separation. Without adequate set-back Wilson Street residents will be adversely affected by this development and will lack appropriate privacy and security protections.
21.	I am proposing that the mandated set-back area against Wilson Street be re-zoned as recreation zoning and be used as parks and safe play space for children and families of the area. This would be in line with community expectations of an outdoor life and enhances wellbeing. This approach would also be similar in nature to other small family friendly parks in Newtown, Erskineville, Alexandria and Redfern.
D.	Shared road directly behind Wilson Street
c F	The proposal outlines that a shared road be built immediately behind Wilson Street apartments. According to the design guidelines the road will directly abut Wilson Street apartments, specially the bedrooms and living spaces of 20 apartments. This road would be considered a public roadway and does not provide a minimum setback in line with Government Requirements of 3m for rear setback controls. It would not be appropriate to have zero set-back against Wilson Street.
23.	If an adequate set-back is not provided, the design guidelines fail to provide adequate separation of people's homes, leading to a lack of visual privacy, lack of recognition that residents of Wilson Street require privacy, lack of security for the building, and increases noise pollution from pedestrians and vehicles due to the street's close proximity.
24.	Residents of Wilson Street will not be afforded the opportunity anymore to peacefully enjoy our homes. Residents have had peaceful enjoyment of their homes for over 30 years and object to this being taken away from us.
E.	Solar impact of the development against Wilson Street
25.	The proposal allows for building F to be built up to 54m, and buildings K2 and L1 to be built up to 128.2m.

26. The design guidelines fail to consider the solar impact and loss of light that would occur to Wilson Street if the current re-zoning application is approved. Building F would provide



H. Precinct entrance at Shepherd St, Ivy Lane and Little Eveleigh Street

- 34. The introduction of new access points off Shepherd St and Ivy Lane and Little Eveleigh Street are inappropriate and create a major safety hazard for pedestrians and cyclists on Wilson Street. All streets surrounding the Paint Shop sub-precinct are quiet residential streets that get greater foot and cyclist traffic than vehicle traffic.
- 35. The recently completed cycleway along Wilson Street forms part of the City of Sydney's Cycling Strategy and Action Plan, and is used by countless cyclists every day.
- 36. To have the entry to the proposed precinct cross this cycleway is unsafe and contradicts the City of Sydney's masterplan to provide a safe cycling network across the city. Having the entrance and exits onto this precinct via narrow residential streets crossing busy pedestrian and cycleways, without consideration of safety is irresponsible and an example of poor planning.
- 37. Other access points should be considered for the primary access, including linking up to the existing Carriageworks Way to ensure vehicle traffic does not create safety hazards by crossing pedestrians and bicycle pathways.
- 38. An approach similar to the entrance constructed on the South Eveleigh site onto Mitchell Rd and Henderson Rd is appropriate as there are existing main roads with traffic lights that could accommodate an increase in vehicular traffic. Wilson Street, Shepherd St, Ivy Lane and Little Eveleigh St cannot accommodate this. It is inappropriate to make these major site access points off minor quiet residential streets.
- 39. Further, consideration should be given to the extra 10,000 pedestrians that are expected to be walking down Little Eveleigh St, Wilson St, Shepherd Let, Ivy St, Ivy Lane and Codrington St each day as a result of the Southern Concourse construction at Redfern Station, the introduction of the Waterloo station and the potential increase of pedestrians once all students return to face-to-face learning. This proposal should be considered against the Southern Concourse construction and pedestrian movements.

# I. Inadequacy of traffic and noise studies undertaken - wrong area of Wilson St

- 40. The traffic and noise studies that support this rezoning application are inaccurate, and in the instance of a traffic study non-existent. The design guidelines are therefore based off deliberately missing or misleading information.
- 41. I refer to the Noise and Vibration Assessment Study where it states that no traffic studies were undertaken, and therefore the assumptions on current vehicle trips of 350 during the AM peak hour are invalid and not appropriate to use as a reference point. The report equally does not consider the traffic impacts on bringing a major precinct access point into the quietest end of Wilson Street (between Shepherd St and Ivy St) that currently has the least amount of traffic. This area is likely to experience a significant increase in vehicle traffic if the re-zoning goes ahead and is not in line with community expectations of a quiet residential street.
- 42. Considering that the assumption on current vehicular use of Wilson Street is invalid. The assumption that the AM peak hour trips would only increase to 520 trips and would have a negligible impact by increasing noise by <2dB(A) is also invalid. My view is that there would be a significant noise and vehicle trip increase during all times of the day and night as a result of this proposal.
- 43. The proposal also does not consider the impact on vehicular trips outside of peak hours that would increase as a result of the zoning to make this a "24-hour" precinct that allows late-night venues. A further traffic assessment that considers the impact of introducing restaurants, bars, cafes and late night venue traffic and bringing this traffic onto a quiet residential street is essential in order to adequately consider the traffic noise impact.

- 44. In the current form it is likely that residents of Wilson St will get a significant increase in traffic noise at all hours of the day, which does not allow for peaceful enjoyment of our homes. This will be particularly noticeable to the residents on the southern side of Wilson Street whose bedrooms will abut directly onto a major access road, where there will be traffic at all hours.
- 45. With the expectation that over 700 residents and 6000 workers will be in the area every day, along with "visitors" to the retail, hospitality and community facilities there will be more noise impacts than currently outlined. The design principles are inadequate in relation to traffic noise, and if they were adequate would not support a development of this size being inserted into a residential area.
- 46. The traffic noise plans also do not account for the volume of waste management services that will be required to service the site.
- 47. The road traffic noise intrusion assessment that occurred out the front of Wilson St on June 16 July 7 2021 states recorded traffic noise is 53dB(A) during the day and 46dB(A). The area selected for the road traffic noise intrusion assessment is inappropriate as it is not the part of Wilson St that will be most affected by road traffic noise. The assessment should have occurred on Wilson St between Shepherd St and Ivy Lane.
- 48. I also note that the Noise and Vibration Assessment Study sates that the noise is unlikely to impact the proposed new residential buildings, but nothing is recorded on the impact on the current residential dwellings. This suggests to me that their deliberate exclusion from this report would mean that noise levels would be detrimental to current dwellings. Therefore, the design guidelines and rezoning are inappropriate on the basis of traffic noise impact to existing residents.
- 49. The noise controls are also not adequate for a residential area where construction of a site is expected to last 8-10 years. The proposal allows for construction to begin at 7:00am, whereas City of Sydney recommends a start time of 7.30am in residential areas.

# J. Noise pollution

- 50. Considering the re-zoning request is as broad as could possibly be and allows for late night venues, live music venues and outdoor events to occur within the precinct, no consideration has been given to the long term noise pollution that would occur as a result of this zoning change and increase in density of the area with over 7000+ people in the area each day.
- 51. The southern side of Wilson Street will be most detrimentally impacted as a result of the zoning changes and lack of reasonable noise controls, and volume of people due to having commercial, retail and hospitality venues directly opposite and beside people's apartments.
- 52. The noise of people entering and exiting buildings F, K2, P and L1 each day, along with the option to use the outdoor space for commercial purposes without adequate noise controls will create permanent ongoing harm for residents in Wilson Street. The re-zoning should not allow for the increase in density nor the increase in the floor space ratio on the basis of the potential permanent unacceptable noise levels that would be inflicted on the residents of Wilson Street 24/7.
- 53. The Noise and Vibration Assessment Study in 'Table 13' outlines the project amenity noise; however, fails to consider the cumulative noise impacts of the entire site, including outdoor pedestrian noise from 7000+ people in the site every day on the surrounding area. This would significantly raise the noise levels surrounding existing dwellings and residents. There is no consideration for the detrimental health impacts noise pollution can cause, such as hearing loss, headaches, fatigue, high blood pressure, heart disease, sleep disturbances, stress and mental health issues. This needs to be considered from both a permanent perspective once the

development is completed and for the 8-10 years of construction noise that residents would suffer through whilst it is being built.

54. On the basis of noise pollutions impacts to residents in existing dwellings, especially Wilson Street, the entire site should not be re-zoned for mixed use at the proposed density. There should be dedicated zoning around existing residences, such as, recreational zoning that reduces the harm permanent noise pollution could cause.

### K. Light pollution

- 55. In the current design guidelines a request to increase the allowable height of buildings K2 and L1 to 128.2m and building F to 54m. K2 and L1 are designed for the exterior to be made out of entirely glass and used as office buildings. No impact assessment from a light pollution perspective has been undertaken on surrounding residences, including Wilson Street to demonstrate the impact of placing two glass buildings immediately behind residences.
- 56. Most office buildings keep their lights on at night and this will cause significant light pollution from glare, light trespass, and clutter (*grouping of lights that collectively generates too much light at night*) to the southern facing residents of Wilson Street, and all other southern facing residences on Wilson St, and Wilson Lane with lights glaring all night into residents' living rooms and bedrooms. I disagree with the Pollution Assessment report that the lighting from the buildings on Wilson Street will be "*unlikely to affect the neighbouring properties*." Further this Pollution Assessment report states that the proposed buildings on the southern perimeter of the site "*facade/outdoor terrace lighting may affect the rail corridor*." It is worth noting that the impact of this light on Wilson Street, and all other residences in the area has not been studied, even though these residences will be exposed to the same amount, if not, more light than the rail corridor due to the proximity of these developments and the active street frontages facing Wilson Street apartments.
- 57. The significant light pollution that would occur as a result of this development does not consider the adverse health impacts on existing residents including: sleep deprivation, fatigue, stress, headaches, anxiety, reduction in melatonin production and current medical research that indicates a potential link between artificial light and cancer.
- 58. The re-zoning should not allow for the height of the K2 and L1 buildings to create such significant light pollution, and the current height restrictions for the precinct should remain in place.

# L. Inadequate provision of housing suitable for multi-person homes including families (Apartment Mix)

- 59. The design guidelines refer to studies and recommendations that state that most apartments in the area are for single person households and that the expectation that lone person households are the group that is expected to have the greatest increase in demand for housing. However, this fails to recognise that families and multi-person households are unable to find suitable housing in the area and are therefore being forced to leave due to inadequate provision of housing suitable to their needs. The design guidelines and apartment mix (9.5.13) fail to address this need by setting a minimum requirement of 40% of 1 bedroom or studio apartments. Minimum limits on 3 and 4 bedroom apartments should be increased to provide adequate housing for families and multi-person homes.
- 60. The design guidelines refer to "diverse housing," however a clear definition of "diverse" is not provided. The 30% target should not be left open to interpretation to a developer as to what "diverse" means, as this could potentially then continue to fail to address the housing crisis facing the area. "Diverse" housing leaves open the opportunity for a minimum of 15% of all housing to be student housing, which is not required to have as high building, design and apartment fit out standards as residential apartments. Increased student housing in an area

where there is already adequate student housing is unnecessary and fails to address the core housing crisis in this LGA.

- 61. The Social Infrastructure Study and Health Impact Assessment report also states that "more than 5000 City area residents were living in severely crowded dwellings, temporarily with other households" along with homelessness. The current design guidelines fails to address the lack of appropriate sized dwellings for multi-person households and the urgent need to increase social housing. Further, by all housing in this development being privatised it will exacerbate housing affordability problems in the LGA. This same report also states that "international evidence has shown that innovation distractions are known to reduce housing affordability and displace many lower-income earners and long-term residents." With this in mind, the design guidelines and re-zoning should be radically re-thought to ensure that there will be no adverse impact on the areas most vulnerable residents and long-term positive housing solutions for these residents be incorporated.
- 62. The design guidelines and re-zoning change request do not meet community expectations regarding the lack of social housing, and the lack of definition of "diverse housing." Further, without guaranteed housing for First Nations the design also does not meet community expectations.

### M. No guaranteed open space or recreational area

- 63. The request to re-zone the entire site as mixed-use, without guaranteeing that the areas in the plan listed as "open space" be zoned as "recreational area", demonstrates that there is an inherent failure in the re-zoning request to meet the design guidelines of "great public space." If the entire site is "re-zoned" as mixed-use with the proposed density and floor space ratio there is no guarantee that the spaces marked as "open-space" will actually be open space. It would allow the developer to put buildings on and commercialise the open space for their benefit. Appropriate zoning of "recreational area" should be applied to these spaces to guarantee that they can only be used for recreation.
- 64. Using recreation area zoning would also be in line with the South Eveleigh development where recreational area zoning is applied and parkland and sporting facilities are guaranteed for the community.
- 65. Further, by using a lower level planning document the design guide to say where the floor space should go rather than allocating it building by building provides greater flexibility for the developer who purchases the site, and no certainty for the community. By using this design guide over a more appropriate planning document for a site of this scale it is likely that the developers plans will deviate significantly from these guidelines and be more likely to have a more extreme impact on the community and existing residences.
- 66. Further to this, according to 5.1.3 in the Context Analysis, it is stated that there is a void of open space within a 500m radius of the development, and a general deficit of sporting and recreation facilities in the area. It also notes that the available open areas are very small and any increase in density requires a proportional increase in open space. If this development is to bring in what is a likely 10-fold increase of people into the area each day a significant increase in guaranteed open spaces, sporting facilities and safe play areas for families is absolutely essential.
- 67. Due to the lack of zoning of recreational areas in the Paint Shop sub-precinct the design guidelines and zoning is totally inadequate in addressing the Context Analysis and the deficit of appropriate outdoor spaces for the community.
- 68. The proposed "open-spaces" does not provide safe play areas for children, especially children with disabilities and mobility issues, and there is no provision for community sporting and

recreation facilities. There is also no provision for public amenities such as toilets.

- 69. The Social Infrastructure Study and Health Impact Assessment report states that a key consideration to improve the health and wellbeing of the area should be "greening the urban environment to support community wellbeing." Without guaranteeing green space through zoning of appropriate recreational areas the development will fail to improve the overall health and wellbeing of residents. It is worth noting that this same report states that the levels of mental health distress in this local government area is higher than other areas, and the lack of appropriate green and outdoor space in this area. There is a significant body of scentific research which demonstrates that lack of green outdoor space has detrimental affects on mental health, such as higher levels of mental distress, higher stress levels, higher levels of anxiety & depression and higher levels of disease prevalence for both adults and children. Adequate provision of green space needs to be provided in this development, to ensure that an improvement in community health outcomes can be made and the health of the children in the community can be protected.
- 70. My recommendation is that K2 and L1 be rezoned as recreational areas and have purpose built sporting and safe play areas built for children. This would still allow for appropriate development to occur on the site, be best connected to the new apartment sites whilst also providing an adequate level of safe spaces for children, families and all residents to use and in keeping with the expectation of an Australian outdoor lifestyle where everyone is able to participate in outdoor sports and pursuits, and meet the design guidelines and renewal principals in full. This will also improve the health and wellbeing of the community, in line with the need outlined in the Social Infrastructure Study and Health Impact Assessment report.

## N. Inadequate definition of and provision of community and cultural space

- 71. The design guidelines outline a renewal principal of a "great place for the community;" however, the current rezoning proposal will not be an inviting space that will draw people in. Rather it will be a total monstrosity and blight on the landscape which is fully commercialised.
- 72. A fully commercialised space zoned as mixed-use inherently means low income earners and those with no disposable income will never be able to enjoy or use the space. As such, this proposal is exclusionary of the most vulnerable Australians who could most benefit from community and cultural space. In addition, a fully commercialised space is not in line with community expectations and needs. The design guidelines only mandate that 1.6% of the gross floor area is required to be community space, and as the community space will be in the developer's private hands there is no guarantee that the community will ever be able to access these spaces. No provisions have been made to ensure that First Nations health or community spaces will be provided, and this is not in line with the Connecting with Country framework
- 73. Further, the current definition of "community use" includes commercial uses such as run-forprofit childcare centres, which is inappropriate and not in line with the definition of "community use."
- 74. The design guidelines allow for 72.2% commercial use, and only 1.6% for community and cultural use. There is an inadequate provision of guaranteed community and cultural use space in public ownership.
- 75. The design guidelines should increase the amount of community space and mandate that they remain in public ownership to ensure they are protected from commercial interests.

### O. Heritage impacts and lack of coherent identity

76. The design guidelines state that this rezoning proposal will "respect the past, adaptively re-use heritage buildings in the precinct and will acknowledge Redfern's existing character" and

"building positively to its surrounding urban environment."

- 77. The proposal does not respect the past, and nor does it provide respect to the heritage buildings and character of the area. The area is a heritage conservation area and modern-skyscrapers which tower over and dwarf the entire area which has a negative impact on the surrounding environment and the people who live in neighbouring areas can in no way be construed as positively impacting the locale.
- 78. The Paint Shop are seen as buildings of significant heritage value, primarily as a result of the unique roof. The current proposal shows that a building of up to 63.6m can be placed anywhere above and over the entirety of the building. Doing this would ruin the heritage of the Paint Shop and not allow anyone to enjoy the unique heritage of the building. The rezoning should not allow for a building to be placed above the Paint Shop.
- 79. It is worth noting that the design guidelines are entirely inadequate to protect the heritage of this building as there is no information on how much of the Paint Shop could be covered by the building and how much floor space would be in the subsequent tower over the top of the paint shop, and this can be changed by a future design excellence process.
- 80. It is also concerning that the Paint Shop is the only existing heritage building in this proposal that its existing height and structure is not protected.
- 81. The design guidelines also state that this proposal will facilitate a "coherent identity." Upon reviewing the detail in all of the supporting documentation, I disagree that a coherent identity will be facilitated. The current proposal allows for the destruction of and minimisation of the existing heritage value and character and does not provide an identity that is line with community expectations.

#### P. Make the Paint Shop sub-precinct Australia's largest multi-arts centre

- 82. The renewal principals outlined in 'Table 2' in the planning report outlines that a key renewal principal of the site is for the Paint Shop sub-precinct to become "Australia's largest multi-arts centre", however, there is no requirement in the design guidelines that dedicated arts facilities be provided.
- 83. What is outlined is that of the minimal 1.6% community and cultural space, 1000sqm of this space be available for creative and cultural use which could be occupied by commercial tenants, such as private media broadcasting companies like Foxtel, that meet an intentionally broad definition of "creative."
- 84. This goes against the renewal principals and community expectations around multi-arts centres. The standard definition of a multi-arts centre is that there be public space that fosters innovation and creativity, and also allows art to be exhibited and cultural events to be run.
- 85. These spaces should be major cultural destinations that have the potential to attract national and international artists. These types of spaces are not suited to commercial ownership. In the rezoning proposal with the deliberately broad definition of "creative" that is open to interpretation by the developer. Therefore, the design guidelines and current rezoning proposal fail to deliver a multi-arts space for the community.
- 86. There should be a development plot that, like the Paint Sheds plot of H, that is publicly owned for the arts.

#### Q. Length of construction - 8-10 years

87. The supporting technical documentation for the rezoning proposal of the Paint Shop subprecinct notes that if the proposal were to go ahead in its current state development would take

- 8-10 years before completion. The design guidelines state that the proposal should improve the mental health of residents. I strongly object to this.
- 88. In no scenario does 8-10 years of constant construction and development improve mental health outcomes of any resident in the area. If anything, it will have detrimental health outcomes on all residents in the area from the air and dust pollution from the development, constant construction noise and construction traffic noise, disruption and damage to our residences.
- 89. The Pollution Assessment report states that there will be air pollution expected as a result of demolition, excavation and construction works and would be considered "temporary." I disagree with the view that this level of pollution is temporary as construction is expected to last for between 8-10 years, this level of increased pollution can result in irreversible negative health impacts. The health impacts of construction generated pollution are incredibly serious (e.g. respiratory illness, cardiovascular disease, reduced lung function in children, and links to early onset dementia), and the development control measures outlined are entirely inadequate.
- 90. This development will occur in a quiet residential area and permanently change the lives of all of the residents, including their children who from a young age will experience the adverse impacts of major developments on their lives.
- 91. The rezoning proposal should not go ahead in its current state to ensure that residents do not experience the harmful effects of 8-10 years of constant major development.

#### R. Wind tunnel effects

- 92. I refer to the Pedestrian Wind Environment Study for Redfern North Eveleigh where it states that "the wind conditions for the majority of the traffic able outdoor location within and around the Paint Shop sub-precinct will be suitable for their intended effect."
- 93. As the study did not test wind impacts to the full-extent of the allowable building height, size, and number of buildings that could be built under the design plan, the results of this study are invalid.
- 94. The proposal does state that there are localised areas within the precinct which would exceed the assigned comfort criterion and could be managed by mitigation measures. However, since testing has not been done to the design guidelines full allowances there is no guarantee that more of the development area would exceed the comfort criterion and whether they could be adequately managed, or whether consideration needs to be given to the new buildings overall height and close proximity to ensure no wind tunnel effects occur.
- 95. As the areas that are likely to exceed the comfort criterion are out the front of the K2 building, and directly opposite the southern side of Wilson Street, the wind tunnel effects are likely to also adversely impact peoples' enjoyment of their own apartments and outdoor space that is in close proximity to K2. A reduction in the scale of K2 and greater separation between K2 and Wilson Street should occur to ensure existing residents of Wilson Street are not impacted by a wind tunnel, and unable to have peaceful enjoyment of their home.

#### S. Climate Change

- 96. One of the objectives of the proposal is to support the government aims to get to net zero emissions by 2050. If the government did genuinely want to get to net zero emissions by 2050 the proposal would not include the development of five skyscraper buildings and three other excessively high buildings.
- 97. Current scientific research is clear on the impacts skyscrapers and overly tall buildings have on climate change none of them are positive. The embodied-carbon levels and operational-

carbon levels of skyscrapers are not environmentally friendly and a major contributor to climate change. Most research suggests that high-density low-rise developments and cities are more environmentally friendly than high-rise high-density developments and cities. As such, consideration should be given to updating the re-zoning proposal, and building heights to ensure that the area becomes low-rise high-density. Further, consideration needs to be given to guaranteed green space that is accessible and useable for both the community and native flora and fauna.

98. A revised re-zoning proposal would be more effective in making progress towards the NSW Governments net-zero 2050 target.

#### T. Overall comments on the proposal and private ownership of the land

- 99. This proposal very clearly demonstrates that a lack of community consultation has occurred and community and environmental needs have obviously not been considered. The sale of this land is clear to all members of the community that this is a money grab by the NSW Government. The re-zoning is to be as broad as possible, and offers no guarantees that any land be public open space. This is most concerning and incredibly disappointing.
- 100. The government has the opportunity to be at the fore-front of designing for the future in a climate and community friendly way that would be seen as progressive and world-leading if a different view was taken with this proposal. The government has the opportunity to regenerate this under-utilised open space and turn it into a much-needed housing and green recreational safe play, recreation and sports area that meets the needs of the community by the land remaining in public hands. It might not return the cash to the government; however, the benefit to the community would be priceless. There would be measurable positive impacts to community health and social outcomes if the proposal was significantly altered to include and mandate recreation, and community space, as well as, a reduction in building height.

#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 8:46 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 08:46

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

#### First name

David

#### Last name

Pryor

#### I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

2015

#### Please provide your view on the project

I object to it

#### **Submission**

Development of the city needs clear boundaries between areas of the city with highrise and the surrounding areas with their terraces and unique character. From Redfern Station to the west, I strongly believe that a low rise character must be maintained.. The scale of current developments at Carriageworks should be maintained - with large sheds and maximum 10 floor height restrictions.

The tech precinct around Central, and the corridor from Redfern to the Waterloo Metro provide sufficient space for massive highrise (at Central) and more considered highrise (towards the Waterloo Metro). Allowing 100m plus highrise development in the Paint Shop Precinct is a mistake that should not be allowed.

If the Government is seeking more funds from this endeavour, it should instead pursue Rate Reform and utilise Capital Improved Value on the land rather than land tax on these sites - bringing future revenue and adding a brake to unmitigated development.

#### I agree to the above statement

Yes

#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 10:09 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** lp-paint-shop-submission.pdf

Submitted on Thu, 25/08/2022 - 22:06

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# Name

#### First name

Luke

#### Last name

Parker

I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

Pennant Hills 2120

#### Please provide your view on the project

I object to it

#### **Submission file**

lp-paint-shop-submission.pdf

#### **Submission**

Please find attached a copy of my full submission document.

I vehemently oppose the rezoning proposal in this form. This proposal is not in line with the heritage of the area and does not meet any community needs. The height of the buildings proposed is absolutely appalling and the fact that there has been little to no consultation with residents is a disgrace. Residents of Wilson Street Darlington and surrounding streets have organised and will be collectively working together to oppose the rezoning proposal and development at every stage until we are satisfied that this proposal is reduced in scale and includes an introduction of recreational space, and the scale and height of the proposal is reduced and meets community needs.

#### I agree to the above statement

Yes

I am writing this submission as a former resident of the area, and as someone who worked at Darlington Public School for 4 years until last August. The area will be severely and negatively impacted by the development if it goes ahead in its current form. The primary school aged children I worked for at Darlington Public School will be adversely affected by the development and the lengthy construction, through from a lack of sporting facilities and green space, which will not support their mental and physical health.

I really enjoyed living and working in this heritage area and loved the community based environment and this rezoning will drastically impact this in an extremely adverse way.

I have grave concerns about the proposed rezoning and redevelopment of the North Eveleigh Paint Shop site. Based on the current re-zoning proposal all of the apartments in Wilson Street, and all residences in the surrounding area will be significantly and detrimentally impacted as a result of this development in its proposed form. As a former member of the local community, this redevelopment will also not lead to positive outcomes for the broader community.

The concerns I have are as follows:

# A. Impact on the structural integrity of Wilson Street

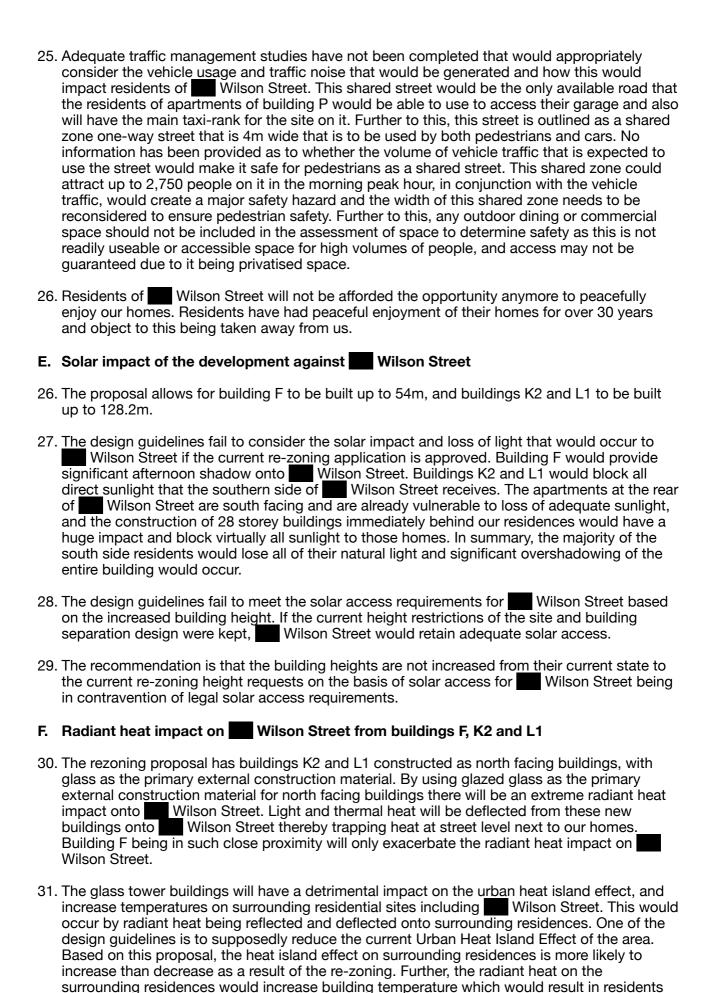
- 1. As per the design guide, buildings F, K2, L1, K1 and P are all new buildings to the area and are in close proximity to Wilson Street. I have concerns that the increase in allowance of building height from the current permissible heights, and the impact of the construction of these oversized buildings, may have on the structural integrity of Wilson Street.
- 2. The Noise and Vibration Assessment report is basing the construction impact from a 2008 report that only considers buildings that directly back onto the rail lines, and do not consider the quadrupling of the height of the buildings submitted in this re-zoning proposal.
- 3. Comparable buildings of a height of up to 128m require deep excavation which has clearly not been considered in the current proposal as there has not been an assessment on whether the land can support buildings of this height and density. I object to the increase in building heights to their current levels of buildings F, K2, L1, K1 and P on the basis that these buildings are likely to have direct negative consequences on the structural integrity of wilson Street, and all surrounding residences on Wilson Street. I believe the current allowable building heights as per the current zoning is adequate to allow for a full regeneration of the area in line with the design guidelines in a way that is also unlikely to have such a dramatic effect on the surrounding residences.
- 4. I also note that no assessment has been completed with respect to the rezoning of the potential impact of construction vibration to adjacent buildings, nor is this required to be considered as the design guidelines do not have this as a requirement. Any future works should also consider the construction impact on the immediate surrounding dwellings.

#### B. Height of buildings are inappropriate

- 5. The height and storey restrictions of the proposed buildings are entirely inappropriate for the area and are not in line with the area's status as a conservation area. The scale of the buildings K2, L1, P, K1, E1, E2 and possible addition above the Paint Shed is excessive, against the design principles and not in keeping with the character of the area.
- 6. I refer to the Public Domain, Place and Urban RNE Design Masterplan which in section 5.1.2. referred to the Innovation Precincts Building Typologies and stated that there are "tall buildings in successful districts setting precedent for height' however, the comparable buildings referred to were significantly smaller in both actual height and number of storeys than is being proposed in this re-zoning, specifically the Foundry in South Eveleigh is six storeys and the Sydney University Business School is seven stories. If these buildings are the height precedence for the area, all building heights in this proposal should be reduced and no change in the current allowable building heights should occur.

- 7. Current building heights on Wilson Street are no more than 12 meters. This proposed rezoning is allowing for buildings to be built up to 58.2m on Wilson Street, and up to 128.8m on buildings behind Wilson Street. This scale is not appropriate for the area and current height restrictions should remain on the entire site. Further the use of a set-back on the same building plate for all Wilson Street facing buildings to justify the increase of buildings to nine storeys is inconsistent with the heritage conservation status of the area and the aesthetics of the street.
- 8. The maximum height of buildings on Wilson Street being 58.2m is not appropriate for a conservation area that is currently a primarily residential street, and is not in line with the current residence design of terrace housing and low-rise set-back apartment buildings. The vision of the North Eveleigh re-zoning is for the new buildings to be built positively into the surrounding urban fabric. This will not occur if the development occurs at its proposed building height limits. It will be a clear and obvious eye-sore that does not integrate into the area and will become a blight on the landscape for all current residents.
- 9. Further to this, the statement that the proposal's built form "will provide an appropriate transition from the low rise and fine grain scale of Wilson street, industrial scale and texture within the curtilage of the robust industrial Paint Shop to taller articulated tower structures closer to Redfern Station" is factually incorrect and clearly does not allow for a seamless integration between small terrace housing and low-rise apartments by allowing for buildings of up to 58.2m on Wilson Street, and 128.8m towers behind. This proposal dwarfs all existing structures on Wilson Street and is not considerate of the heritage and community. Residents see the proposed building heights as grossly excessive and will result in monstrous constructions that will overpower the neighbourhood.
- 10. This proposal of building heights of up to 128.8m is not in line with recent development in South Eveleigh, or the Carriageworks and the design principles should be extended to consider the impact on these buildings and sub-precincts. The re-zoning should only allow for heights that are similar to what has been approved and constructed in South Eveleigh and Carrigeworks to continue the appropriate design that has been successful in these areas.
- 11. The current floorspace ratio of 2:1 should also remain, and not be increased to the proposed level of 2.78:1 and all open space removed from the allowable floor space ratio for development to ensure that the buildings & development plots do not get floor space that would be deliberately imbalanced against the entire site.
- 14. Importantly, the height of the proposed building will reduce light into many of the apartments in Wilson Street as discussed further in Section E below. This will breach the owners and tenants' rights to enjoyment of their property. Light is essential to wellbeing.
- 15. The height will also dramatically alter the views from many of the apartments facing South Eveleigh. This will breach the owners and tenants' rights to enjoyment of their property. I disagree with 3.4 View Place Sensitivity in the Visual Impact Assessment report that the views on the immediately surrounding streets would not have a negative visual impact if the proposed built form is built, as there would a loss of a view of the skyline, open space and the heritage buildings in this sub-precinct and the South Eveleigh precinct. Further, a view of monstrously high and overpowering sky-scrapers is an entirely inappropriate replacement for existing enjoyable views. Section 3.5 in the Visual Impact Assessment report states "southfacing units at Wilson Street that projects into the site will be exposed to potential views from the site" and I disagree with the statement that the views that would be lost would not be "views of high scenic quality, iconic views or access to views of individual icons." These south facing apartments have views of all heritage buildings in this precinct, the South Eveleigh heritage buildings and have wide ranging enjoyable sky-line views. The deliberate exclusion of these residences from the view-loss analysis is inappropriate and if included would suggest that development of this scale and height should not proceed as the views of the proposed form would be highly unpleasant.

16.	The sky-view assessment also does not measure the sky-view impact that residents of Wilson st would experience as a result of this development. Based on the height and proximity of the proposed developments, it is likely that most apartments in Wilson st will lose most, if not all, of their sky-view and the loss will exceed City of Sydney requirements. This together with the exclusion of the Wilson st from the Visual Impact Assessment report is incredibly concerning and the development scale should be re-considered.
C.	Building and street set-back against Wilson St
17.	Section 5.1.7 of the Public Domain, Place and Urban Design Masterplan outlines that there is a requirement of adequate building separation distances of:
	<ul> <li>12m set-back against a maximum 4 storey development</li> <li>18m set-back against a maximum 8 storey development</li> <li>24m set-back against a 9+ storey development.</li> <li>The design guidelines do not mandate that this set-back must occur for any building that is built near</li> <li>Wilson Street.</li> </ul>
18.	In the current proposal the floor plate and allowable development space of Building F is right up to the property boundary of Wilson Street, therefore this re-zoning in its current state allows for a 5 storey building to be built to the boundary of Wilson Street.
19.	Buildings K2 and L1 have a maximum allowable number of storeys as 26. The current layout and spacing between K2, L1 and Wilson Street does not provide a 24-meter separation. Based on current models and images seen in all supporting technical documents there seems to only be 13.3m between Wilson Street and K2 and L1 - which is highly inappropriate and evident that this proposal will have significant detrimental ramifications on Wilson Street. The proposal and building height, size and scale of both K2 and L1 is only feasible at the expense of the apartments of Wilson Street losing our right to peaceful enjoyment of our homes.
20.	Therefore, this current design guidelines and re-zoning proposal is inadequate to meet the requirements of building separation. Without adequate set-back Wilson Street residents will be adversely affected by this development and will lack appropriate privacy and security protections.
21.	I am proposing that the mandated set-back area against Wilson Street be re-zoned as recreation zoning and be used as parks and safe play space for children and families of the area. This would be in line with community expectations of an outdoor life and enhances wellbeing. This approach would also be similar in nature to other small family friendly parks in Newtown, Erskineville, Alexandria and Redfern.
22.	Further the setback outlined in 5.1.7 of Public Domain, Place and Urban Design Masterplan must occur and be mandates as part of the rezoning proposal and should not be reduced to accomodate this rezoning, which is indicated in the Design Guidelines as occurring.
D.	Shared road directly behind Wilson Street
23.	The proposal outlines that a shared road be built immediately behind Wilson Street apartments. According to the design guidelines the road will directly abut Wilson Street apartments, specially the bedrooms and living spaces of 20 apartments. This road would be considered a public roadway and does not provide a minimum setback in line with Government Requirements of 3m for rear setback controls. It would not be appropriate to have zero set-back against Wilson Street.
24.	If an adequate set-back is not provided, the design guidelines fail to provide adequate separation of people's homes, leading to a lack of visual privacy, lack of recognition that residents of Wilson Street require privacy, lack of security for the building, and increases noise pollution from pedestrians and vehicles due to the street's close proximity.



being forced to increase their air conditioner use to provide a comfortable temperature within

their homes. Increased air conditioner use is in contradiction to the proposal's aim to have a positive impact on climate change and make progress towards the NSW Governments net zero 2050 target. Therefore, this design is in breach of the design guidelines.

32. Consideration should be given to height reduction of buildings K2 and L1 that would lead to a reduction in the urban heat island effect.

## G. Active street frontages on precinct and impact on Wilson Street

- 33. The design guidelines have outlined active street frontages, and the location of new retail and hospitality venues at those street fronts. The southern side of building F has a 0m ground level set-back, which is the same set-back that the southern side of Wilson would have. These zonings do not consider the privacy, noise, traffic, light, security and safety impacts to Wilson Street by having active street frontages against ground level apartments and residents' bedrooms.
- 34. The design guidelines and current re-zoning are not fit for purpose and do not meet the residents' expectations of peaceful enjoyment of their homes if active street frontages without a set-back be introduced in all surrounding buildings. Further, these 0m setbacks with retail frontages are not in line with the character and heritage of the building, with the current heritage appropriate street frontage evidenced in Figure H: Section 17 Wilson Street Central street cut-through. Further the design guidelines state that no set-back is required yet, Figure 15 Section F Wilson Street (West) in the design guidelines shows a building with a 3m set-back. This is misleading, and the rezoning should not allow for zoning of "24-hour" retail and hospitality spaces on a guiet residential street where this is currently not allowable.
- 35. These street frontages on Wilson Street that are also zoned to include retail and hospitality spaces, which is not in line with the heritage character of the street.

#### H. Precinct entrance at Shepherd St, Ivy Lane and Little Eveleigh Street

- 36. The introduction of new access points off Shepherd St and Ivy Lane and Little Eveleigh Street are inappropriate and create a major safety hazard for pedestrians and cyclists on Wilson Street. All streets surrounding the Paint Shop sub-precinct are quiet residential streets that get greater foot and cyclist traffic than vehicle traffic.
- 37. The recently completed cycleway along Wilson Street forms part of the City of Sydney's Cycling Strategy and Action Plan, and is used by countless cyclists every day.
- 38. To have the entry to the proposed precinct cross this cycleway is unsafe and contradicts the City of Sydney's masterplan to provide a safe cycling network across the city. Having the entrance and exits onto this precinct via narrow residential streets crossing busy pedestrian and cycleways, without consideration of safety is irresponsible and an example of poor planning.
- 39. Other access points should be considered for the primary access, including linking up to the existing Carriageworks Way to ensure vehicle traffic does not create safety hazards by crossing pedestrians and bicycle pathways.
- 40. An approach similar to the entrance constructed on the South Eveleigh site onto Mitchell Rd and Henderson Rd is appropriate as there are existing main roads with traffic lights that could accommodate an increase in vehicular traffic. Wilson Street, Shepherd St, Ivy Lane and Little Eveleigh St cannot accommodate this. It is inappropriate to make these major site access points off minor quiet residential streets.
- 41. Further, consideration should be given to the extra 10,000 pedestrians that are expected to be walking down Little Eveleigh St, Wilson St, Shepherd Let, Ivy St, Ivy Lane and Codrington St each day as a result of the Southern Concourse construction at Redfern Station, the introduction of the Waterloo station and the potential increase of pedestrians once all students

return to face-to-face learning. This proposal should be considered against the Southern Concourse construction and pedestrian movements.

#### I. Inadequacy of traffic and noise studies undertaken - wrong area of Wilson St

- 41. The traffic and noise studies that support this rezoning application are inaccurate, and in the instance of a traffic study non-existent. The design guidelines are therefore based off deliberately missing or misleading information.
- 42. I refer to the Noise and Vibration Assessment Study where it states that no traffic studies were undertaken, and therefore the assumptions on current vehicle trips of 350 during the AM peak hour are invalid and not appropriate to use as a reference point. The report equally does not consider the traffic impacts on bringing a major precinct access point into the quietest end of Wilson Street (between Shepherd St and Ivy St) that currently has the least amount of traffic. This area is likely to experience a significant increase in vehicle traffic if the re-zoning goes ahead and is not in line with community expectations of a quiet residential street.
- 43. Considering that the assumption on current vehicular use of Wilson Street is invalid. The assumption that the AM peak hour trips would only increase to 520 trips and would have a negligible impact by increasing noise by <2dB(A) is also invalid. My view is that there would be a significant noise and vehicle trip increase during all times of the day and night as a result of this proposal.
- 44. The proposal also does not consider the impact on vehicular trips outside of peak hours that would increase as a result of the zoning to make this a "24-hour" precinct that allows latenight venues. A further traffic assessment that considers the impact of introducing restaurants, bars, cafes and late night venue traffic and bringing this traffic onto a quiet residential street is essential in order to adequately consider the traffic noise impact.
- 45. In the current form it is likely that residents of Wilson St will get a significant increase in traffic noise at all hours of the day, which does not allow for peaceful enjoyment of our homes. This will be particularly noticeable to the residents on the southern side of Wilson Street whose bedrooms will abut directly onto a major access road, where there will be traffic at all hours.
- 46. With the expectation that over 700 residents and 6000 workers will be in the area every day, along with "visitors" to the retail, hospitality and community facilities there will be more noise impacts than currently outlined. The design principles are inadequate in relation to traffic noise, and if they were adequate would not support a development of this size being inserted into a residential area.
- 47. The traffic noise plans also do not account for the volume of waste management services that will be required to service the site.
- 48. The road traffic noise intrusion assessment that occurred out the front of 418 Wilson St on June 16 July 7 2021 states recorded traffic noise is 53dB(A) during the day and 46dB(A). The area selected for the road traffic noise intrusion assessment is inappropriate as it is not the part of Wilson St that will be most affected by road traffic noise. The assessment should have occurred on Wilson St between Shepherd St and Ivy Lane.
- 49. I also note that the Noise and Vibration Assessment Study sates that the noise is unlikely to impact the proposed new residential buildings, but nothing is recorded on the impact on the current residential dwellings. This suggests to me that their deliberate exclusion from this report would mean that noise levels would be detrimental to current dwellings. Therefore, the design guidelines and rezoning are inappropriate on the basis of traffic noise impact to existing residents.
- 50. The noise controls are also not adequate for a residential area where construction of a site is expected to last 8-10 years. The proposal allows for construction to begin at 7:00am, whereas City of Sydney recommends a start time of 7.30am in residential areas.

#### J. Noise pollution

- 51. Considering the re-zoning request is as broad as could possibly be and allows for late night venues with trading until 2am, live music venues and outdoor events to occur within the precinct, no consideration has been given to the long term noise pollution that would occur as a result of this zoning change and increase in density of the area with over 7000+ people in the area each day. Although the design guidelines state that any late night premises should have minimal adverse impacts of residences there is no mandate to ensure there will be no adverse impacts. This is demonstrated through how the rezoning has laid out hospitality venue locations, roads and taxi ranks being right next to will son Street. It is immediately clear that the design guidelines must to be amended to ensure that not just the location of the venue will have minimal impacts but rather the entire site will be configured to ensure no exisiting residences will experience the adverse impacts of this on a daily basis.
- 52. The southern side of Wilson Street will be most detrimentally impacted as a result of the zoning changes and lack of reasonable noise controls, and volume of people due to having commercial, retail and hospitality venues directly opposite and beside people's apartments.
- 53. The noise of people entering and exiting buildings F, K2, P and L1 each day, along with the option to use the outdoor space for commercial purposes without adequate noise controls will create permanent ongoing harm for residents in Wilson Street. The re-zoning should not allow for the increase in density nor the increase in the floor space ratio on the basis of the potential permanent unacceptable noise levels that would be inflicted on the residents of Wilson Street 24/7.
- 54. The Noise and Vibration Assessment Study in 'Table 13' outlines the project amenity noise; however, fails to consider the cumulative noise impacts of the entire site, including outdoor pedestrian noise from 7000+ people in the site every day on the surrounding area. This would significantly raise the noise levels surrounding existing dwellings and residents. There is no consideration for the detrimental health impacts noise pollution can cause, such as hearing loss, headaches, fatigue, high blood pressure, heart disease, sleep disturbances, stress and mental health issues. This needs to be considered from both a permanent perspective once the development is completed and for the 8-10 years of construction noise that residents would suffer through whilst it is being built.
- 55. On the basis of noise pollutions impacts to residents in existing dwellings, especially Wilson Street, the entire site should not be re-zoned for mixed use at the proposed density. There should be dedicated zoning around existing residences, such as, recreational zoning that reduces the harm permanent noise pollution could cause.

#### K. Light pollution

- 56. In the current design guidelines a request to increase the allowable height of buildings K2 and L1 to 128.2m and building F to 54m. K2 and L1 are designed for the exterior to be made out of entirely glass and used as office buildings. No impact assessment from a light pollution perspective has been undertaken on surrounding residences, including Wilson Street to demonstrate the impact of placing two glass buildings immediately behind residences.
- 57. Most office buildings keep their lights on at night and this will cause significant light pollution from glare, light trespass, and clutter (grouping of lights that collectively generates too much light at night) to the southern facing residents of Wilson Street, and all other southern facing residences on Wilson St, and Wilson Lane with lights glaring all night into residents' living rooms and bedrooms. I disagree with the Pollution Assessment report that the lighting from the buildings on Wilson Street will be "unlikely to affect the neighbouring properties." Further this Pollution Assessment report states that the proposed buildings on the southern perimeter of the site "facade/outdoor terrace lighting may affect the rail corridor." It is worth noting that the impact of this light on Wilson Street, and all other residences in the area has not been studied, even though these residences will be exposed to the same amount, if not, more light than the rail corridor due to the proximity of these developments and the active street frontages facing Wilson Street apartments.

- 58. The significant light pollution that would occur as a result of this development does not consider the adverse health impacts on existing residents including: sleep deprivation, fatigue, stress, headaches, anxiety, reduction in melatonin production and current medical research that indicates a potential link between artificial light and cancer.
- 59. The re-zoning should not allow for the height of the K2 and L1 buildings to create such significant light pollution, and the current height restrictions for the precinct should remain in place.

# L. Inadequate provision of housing suitable for multi-person homes including families (Apartment Mix)

- 60. The design guidelines refer to studies and recommendations that state that most apartments in the area are for single person households and that the expectation that lone person households are the group that is expected to have the greatest increase in demand for housing. However, this fails to recognise that families and multi-person households are unable to find suitable housing in the area and are therefore being forced to leave due to inadequate provision of housing suitable to their needs. The design guidelines and apartment mix (9.5.13) fail to address this need by setting a minimum requirement of 40% of 1 bedroom or studio apartments. Minimum limits on 3 and 4 bedroom apartments should be increased to provide adequate housing for families and multi-person homes. Further, the design guidelines allow apartments of two or more bedrooms to be "dual-key" apartments, which in effect, is another way of increasing the number of 1 bedroom/studio apartments. No "dual-key" apartments should be allowed in an area that is sorely lacking in appropriate housing for multi-person and family sized homes.
- 61. The design guidelines refer to "diverse housing," however a clear definition of "diverse" is not provided. The 30% target should not be left open to interpretation to a developer as to what "diverse" means, as this could potentially then continue to fail to address the housing crisis facing the area. "Diverse" housing leaves open the opportunity for a minimum of 15% of all housing to be student housing, which is not required to have as high building, design and apartment fit out standards as residential apartments. Increased student housing in an area where there is already adequate student housing is unnecessary and fails to address the core housing crisis in this LGA.
- 62. The Social Infrastructure Study and Health Impact Assessment report also states that "more than 5000 City area residents were living in severely crowded dwellings, temporarily with other households" along with homelessness. The current design guidelines fails to address the lack of appropriate sized dwellings for multi-person households and the urgent need to increase social housing. Further, by all housing in this development being privatised it will exacerbate housing affordability problems in the LGA. This same report also states that "international evidence has shown that innovation distractions are known to reduce housing affordability and displace many lower-income earners and long-term residents." With this in mind, the design guidelines and re-zoning should be radically re-thought to ensure that there will be no adverse impact on the areas most vulnerable residents and long-term positive housing solutions for these residents be incorporated.
- 63. The design guidelines state that only 25.8% of the gross floor area (GFA) is for residential accommodation, and 72.2% GFA for commercial uses (e.g. office space, retail shops). In an area that is experiencing an acute housing affordability crisis and with the number of LGA residents living in insecure housing, this is not an appropriate level of housing. The amount of commercial GFA should be reduced and residential GFA increased.
- 64. The Aboriginal Heritage Interpretation Strategy report notes that with the gentrification of Inner City Sydney, in particular Redfern and Eveleigh, it has led to an increase in house and rental prices which has forced many long-term Aboriginal residents of Redfern out of the area. This is incredibly concerning and further to this the current proposal does not provide a guarantee

of affordable housing for Aboriginal people.

65. The design guidelines and re-zoning change request do not meet community expectations regarding the lack of social housing, and the lack of definition of "diverse housing." Further, without guaranteed housing for Aboriginal people the design also does not meet community expectations.

#### M. No guaranteed open space or recreational area

- 66. The request to re-zone the entire site as mixed-use, without guaranteeing that the areas in the plan listed as "open space" be zoned as "recreational area", demonstrates that there is an inherent failure in the re-zoning request to meet the design guidelines of "great public space." If the entire site is "re-zoned" as mixed-use with the proposed density and floor space ratio there is no guarantee that the spaces marked as "open-space" will actually be open space. It would allow the developer to put buildings on and commercialise the open space for their benefit. Appropriate zoning of "recreational area" should be applied to these spaces to guarantee that they can only be used for recreation.
- 67. Using recreation area zoning would also be in line with the South Eveleigh development where recreational area zoning is applied and parkland and sporting facilities are guaranteed for the community.
- 68. Further, by using a lower level planning document the design guide to say where the floor space should go rather than allocating it building by building provides greater flexibility for the developer who purchases the site, and no certainty for the community. By using this design guide over a more appropriate planning document for a site of this scale it is likely that the developers plans will deviate significantly from these guidelines and be more likely to have a more extreme impact on the community and existing residences.
- 69. Further to this, according to 5.1.3 in the Context Analysis, it is stated that there is a void of open space within a 500m radius of the development, and a general deficit of sporting and recreation facilities in the area. It also notes that the available open areas are very small and any increase in density requires a proportional increase in open space. If this development is to bring in what is a likely 10-fold increase of people into the area each day a significant increase in guaranteed open spaces, sporting facilities and safe play areas for families is absolutely essential.
- 70. Due to the lack of zoning of recreational areas in the Paint Shop sub-precinct the design guidelines and zoning is totally inadequate in addressing the Context Analysis and the deficit of appropriate outdoor spaces for the community.
- 71. The proposed "open-spaces" does not provide safe play areas for children, especially children with disabilities and mobility issues, and there is no provision for community sporting and recreation facilities. There is also no provision for public amenities such as toilets. The proposed open spaces are subject to site constraints and are designed to be large paved spaces to run commercial events. This is not acceptable and is not genuine open green space for the community.
- 72. Consideration should also be given to whether a development of this scale with an absolute lack of recreational spaces such as sports fields and playgrounds should occur, due to the pressure it will place on surrounding recreational space that is already over-capacity in an area that is demonstrably lacking green space. There has also been an inadequate assessment on the solar impacts on the proposed green space in the proposal from the high-rise buildings in the development and 4.2.1 in the design guidelines should be amended to ensure that adequate solar access to outdoor space is guaranteed. The green and open space outlined in this proposal has limited useable area and does not meet the design principles.
- 73. The Social Infrastructure Study and Health Impact Assessment report states that a key consideration to improve the health and wellbeing of the area should be "greening the urban environment to support community wellbeing." Without guaranteeing green space through

zoning of appropriate recreational areas the development will fail to improve the overall health and wellbeing of residents. It is worth noting that this same report states that the levels of mental health distress in this local government area is higher than other areas. There is a significant body of scentific research which demonstrates that lack of green outdoor space has detrimental affects on mental health, such as higher levels of mental distress, higher stress levels, higher levels of anxiety & depression and higher levels of disease prevalence for both adults and children. Adequate provision of green space needs to be provided in this development, to ensure that an improvement in community health outcomes can be made and the health of the children in the community can be protected.

74. My recommendation is that K2 and L1 (proposed commercial building plots) be rezoned as recreational areas and have purpose built sporting and safe play areas built for children. This would still allow for appropriate development to occur on the site, be best connected to the new apartment sites whilst also providing an adequate level of safe spaces for children, families and all residents to use and in keeping with the expectation of an Australian outdoor lifestyle where everyone is able to participate in outdoor sports and pursuits, and meet the design guidelines and renewal principals in full. This will also improve the health and wellbeing of the community, in line with the need outlined in the Social Infrastructure Study and Health Impact Assessment report.

#### N. Inadequate definition of and provision of community and cultural space

- 74. The design guidelines outline a renewal principal of a "great place for the community;" however, the current rezoning proposal will not be an inviting space that will draw people in. Rather it will be a total monstrosity and blight on the landscape which is fully commercialised.
- 75. A fully commercialised space zoned as mixed-use inherently means low income earners and those with no disposable income will never be able to enjoy or use the space. As such, this proposal is exclusionary of the most vulnerable Australians who could most benefit from community and cultural space. In addition, a fully commercialised space is not in line with community expectations and needs. The design guidelines only mandate that 1.6% of the gross floor area is required to be community space, and as the community space will be in the developer's private hands there is no guarantee that the community will ever be able to access these spaces. No provisions have been made to ensure that First Nations health or community spaces will be provided, and this is not in line with the Connecting with Country framework.
- 76. Further, the current definition of "community use" includes commercial uses such as run-forprofit childcare centres, which is inappropriate and not in line with the definition of "community use."
- 77. The design guidelines allow for 72.2% commercial use, and only 1.6% for community and cultural use. There is an inadequate provision of guaranteed community and cultural use space in public ownership.
- 78. Further to this, there is an inadequate provision and guarantee that community health space will be provided in this development. Not for profit and community run health centres, childcare centres and medical practices are essential in supporting the health and wellbeing of the community. Culturally appropriate health and childcare centres for First Nations peoples should also be mandated as a part of this development. These spaces should be on top of any provision for community space.
- 79. The design guidelines should increase the amount of community space and mandate that they remain in public ownership to ensure they are protected from commercial interests.

#### O. Heritage impacts and lack of coherent identity

80. The design guidelines state that this rezoning proposal will "respect the past, adaptively re-use heritage buildings in the precinct and will acknowledge Redfern's existing character" and

"building positively to its surrounding urban environment."

- 81. The proposal does not respect the past, and nor does it provide respect to the heritage buildings and character of the area. The area is a heritage conservation area and modern-skyscrapers which tower over and dwarf the entire area which has a negative impact on the surrounding environment and the people who live in neighbouring areas can in no way be construed as positively impacting the locale.
- 82. The Paint Shop are seen as buildings of significant heritage value, primarily as a result of the unique roof. The current proposal shows that a building of up to 63.6m high an be placed anywhere above and over the entirety of the building. Doing this would ruin the heritage of the Paint Shop and not allow anyone to enjoy the unique heritage of the building. The rezoning should not allow for a building to be placed above the Paint Shop.
- 83. It is worth noting that the design guidelines are entirely inadequate to protect the heritage of this building as there is no information on how much of the Paint Shop could be covered by the building and how much floor space would be in the subsequent tower over the top of the paint shop, and this can be changed by a future design excellence process.
- 84. Further, the planning report states that "The proposed intervention and modification to heritage items, including the Paint Shop and Paint Shop Extension, are considered to have a minor to moderate physical and visual impact to the form and amenity of these significant structures" which is factually incorrect as placing a building and structural form on top of a building of "exceptional" heritage value has a major impact to the building, heritage nature and view of the building. This statement is based off the findings of the Non-Aboriginal Heritage Study where no community consultation occurred and information was used from studies funded by a developer, Mirvac. This generates conners that the informed from this report could be influenced and presented to reflect the developers interests.
- 85. It is also concerning that the Paint Shop is the only existing heritage building in this proposal where its existing height and structure is not protected.
- 86. The design guidelines also fail to ensure that the current coherent identity, form and housing style on Wilson Street is considered and buildings are designed with this in mind. By allowing for buildings of up to 8 storeys on Wilson Street, this is against the principles of a conservation area and not in line with the heritage community feel. The proposed apartments on Wilson Street will break up the existing continuous form and are not appropriate for a quiet residential street that is steeped in history.
- 87. The "skippy girl fence" is noted as a heritage item of "moderate significance" however, this proposal does not ensure that this public art installation is protected and maintained. The heritage interpretation strategy states that this fence cannot remain in it's current location due to the proposed development on the site; yet fails to recognise that part of it's significance and importance to the community is because of it's current location and that it supports the continual form and heritage of Wilson Street. This fence should be retained in its current location and development built to support and protect this fence. I also strongly reject the proposal that the fence be removed entirely and replaced with "motifs" of the skippy girl.
- 88. The non-aboriginal heritage study completed by Curio states that they have not undertaken any community consultation in putting together their report on the heritage impacts of the proposed development. This is incredibly concerning that no consultation with the community has occurred and that they are making recommendations on the heritage of the community and importance of this to the community without actually speaking to and engaging with the community.
- 89. Further I note that Curio states that as a part of their non-aboriginal heritage study that they are using the information gained from their community consultation for the South Eveleigh development. Curio was contracted by Mirvac, a property developer, for the work on the South Eveleigh Site. My view is that a new non-aboriginal heritage study be conducted that

ensures genuine engagement with the community and takes into consideration community views and needs.

90. The design guidelines also state that this proposal will facilitate a "coherent identity." Upon reviewing the detail in all of the supporting documentation, I disagree that a coherent identity will be facilitated. The current proposal allows for the destruction of and minimisation of the existing heritage value and character and does not provide an identity that is line with community expectations.

#### P. Make the Paint Shop sub-precinct Australia's largest multi-arts centre

- 91. The renewal principals outlined in 'Table 2' in the planning report outlines that a key renewal principal of the site is for the Paint Shop sub-precinct to become "Australia's largest multi-arts centre", however, there is no requirement in the design guidelines that dedicated arts facilities be provided.
- 92. What is outlined is that of the minimal 1.6% community and cultural space, 1000sqm of this space be available for creative and cultural use which could be occupied by commercial tenants, such as private media broadcasting companies like Foxtel, that meet an intentionally broad definition of "creative."
- 93. This goes against the renewal principals and community expectations around multi-arts centres. The standard definition of a multi-arts centre is that there be public space that fosters innovation and creativity, and also allows art to be exhibited and cultural events to be run.
- 94. These spaces should be major cultural destinations that have the potential to attract national and international artists. These types of spaces are not suited to commercial ownership. In the rezoning proposal with the deliberately broad definition of "creative" that is open to interpretation by the developer. Therefore, the design guidelines and current rezoning proposal fail to deliver a multi-arts space for the community.
- 95. Having publicly owned spaces that support the arts and provide development for emerging artists, social enterprises in the arts and Indigenous Artists would make this precinct attractive to tourists and visitors, especially considering the proximity to the CBD and public transport. There is significant economic opportunity if the government were to invest in public spaces for the arts and it is worth noting that in NSW in 2016-17 the arts and cultural sectors contributed \$8.7 billion in direct value to the NSW economy. Providing more arts and cultural spaces in conjunction with hospitality and other cultural venues will drive the economy, improve the growth in the area and the long-term success of the re-development.
- 96. There should be a development plot, like the Paint Sheds plot of H, that is publicly owned and run for the arts. This would support the view from the Museum of Applied Arts and Sciences outlined in 3.1.3 in the Economic Assessment that if the site "retaining and promoting the arts culture, which will keep the precinct interesting. This includes considering exploring subsidised housing and workspace for the arts, and the broader definitions about who would quality for access"

#### Q. Length of construction - 8-10 years

- 97. The supporting technical documentation for the rezoning proposal of the Paint Shop subprecinct notes that if the proposal were to go ahead in its current state development would take 8-10 years before completion. The design guidelines state that the proposal should improve the mental health of residents. I strongly object to this.
- 98. In no scenario does 8-10 years of constant construction and development improve mental health outcomes of any resident in the area. If anything, it will have detrimental health outcomes on all residents in the area from the air and dust pollution from the development, constant construction noise and construction traffic noise, disruption and damage to our residences.

- 99. The Pollution Assessment report states that there will be air pollution expected as a result of demolition, excavation and construction works and would be considered "temporary." I disagree with the view that this level of pollution is temporary as construction is expected to last for between 8-10 years, this level of increased pollution can result in irreversible negative health impacts. The health impacts of construction generated pollution are incredibly serious (e.g. respiratory illness, cardiovascular disease, reduced lung function in children, and links to early onset dementia), and the development control measures outlined are entirely inadequate.
- 100. This development will occur in a quiet residential area and permanently change the lives of all of the residents, including their children who from a young age will experience the adverse impacts of major developments on their lives.
- 101. The rezoning proposal should not go ahead in its current state to ensure that residents do not experience the harmful effects of 8-10 years of constant major development.

#### R. Wind tunnel effects

- 102.I refer to the Pedestrian Wind Environment Study for Redfern North Eveleigh where it states that "the wind conditions for the majority of the traffic able outdoor location within and around the Paint Shop sub-precinct will be suitable for their intended effect.'
- 103.As the study did not test wind impacts to the full-extent of the allowable building height, size, and number of buildings that could be built under the design plan, the results of this study are invalid.
- 104. The proposal does state that there are localised areas within the precinct which would exceed the assigned comfort criterion and could be managed by mitigation measures. However, since testing has not been done to the design guidelines full allowances there is no guarantee that more of the development area would exceed the comfort criterion and whether they could be adequately managed, or whether consideration needs to be given to the new buildings overall height and close proximity to ensure no wind tunnel effects occur.
- 105.As the areas that are likely to exceed the comfort criterion are out the front of the K2 building, and directly opposite the southern side of Wilson Street, the wind tunnel effects are likely to also adversely impact peoples' enjoyment of their own apartments and outdoor space that is in close proximity to K2. A reduction in the scale of K2 and greater separation between K2 and Wilson Street should occur to ensure existing residents of Wilson Street are not impacted by a wind tunnel, and unable to have peaceful enjoyment of their home.

#### S. Climate Change

- 106.One of the objectives of the proposal is to support the government aims to get to net zero emissions by 2050. If the government did genuinely want to get to net zero emissions by 2050 the proposal would not include the development of five skyscraper buildings and three other excessively high buildings.
- 107.Current scientific research is clear on the impacts skyscrapers and overly tall buildings have on climate change none of them are positive. The embodied-carbon levels and operational-carbon levels of skyscrapers are not environmentally friendly and a major contributor to climate change. Most research suggests that high-density low-rise developments and cities are more environmentally friendly than high-rise high-density developments and cities. As such, consideration should be given to updating the re-zoning proposal, and building heights to ensure that the area becomes low-rise high-density. Further, consideration needs to be given to guaranteed green space that is accessible and useable for both the community and native flora and fauna.
- 108. The design guidelines to not mandate that green energy production (e.g. Solar Photovoltaics, Wind and Geothermal) on site be included in the building designs. Solar Photovoltaics should be mandated on all non-heritage buildings. The design and approach taken in the design guidelines for all buildings clearly demonstrates that a sustainable climate friendly approach to

development has not been taken, rather it is using out-dated approaches to building design by building air-conditioned tower blocks from the past. The poor orientation & low amenity design of the residential tower buildings also demonstrates that this proposed overdevelopment has not been considered from an environmental perspective.

- 109. It is incredibly concerning that the Environmental Sustainability report states "given the physical constraints of the development, it is considered that onsite renewable energy generation will be able to produce between 5-10% of the total energy demand, depending on the availability of roof space, energy efficiency measures and operational initiatives across the precinct and the uptake of electric vehicles." Based on this, I am unsure as to how a development of this scale will positively support the governments aim to get to net zero emissions by 2050. It is clear that this development is more likely to increase emissions.
- 110.A revised re-zoning proposal would be more effective in making progress towards the NSW Governments net-zero 2050 target.

#### T. Conflicts of Interest

- 111.I believe it may be public knowledge that Mirvac (property developer) is likely interested in the North Eveleigh Paint Shop sub- precinct. The Consultation Outcomes report clearly shows that developers and their lobby groups (Property Council of Australia) have been involved in all stages of the planning process to date, through Transport for NSW deliberately designing the consultation process to allow for organisations such as Mirvac to "be at the centre of all planning and design." Further to this, 6.2.5.1 outlines that Mirvac has also made a submission during the concept planning phase in March-April 2021 on this rezoning. The submission from Mirvac has not been made public, nor has it been made public what influence this submission had on the rezoning proposal.
- 112.Lobby groups that support the developers who have a commercial interest in the site have had significantly greater access to Transport for NSW during the development process of this rezoning proposal through meetings with Transport for NSW. The consultation outcomes reports outlines that these lobby groups were shown the presentation on the overall precinct and their feedback has been used to support Transport for NSW rezoning proposal, dates below:
  - Property Council of Australia, meeting on 20 October 2021
  - Business Sydney meeting on 18 October 2021
  - Urban Development Institute of Australia (UDIA) meeting on 20 October 2021
- 113.No community groups or residents have been given the opportunity to have meetings with Transport for NSW to see the presentation on the proposal and provide their feedback to be considered as part of the design process in the way the developer lobby groups have. It seems to me like there is a clear influence that these developers and their lobbyists are having on pushing their commercial interests on rezoning the land to ensure it is in their interests. Information should be provided by Transport for NSW to the community on how this proposal could be in the best interests of the community when more access and influence has been granted to developers than the community. By Transport for NSW continuing to support a proposal that is only in the best interest of the developers they are supporting transferring public assets and public wealth into private hands for the benefits of developers and not the community. This proposal needs to be radically reconsidered and influence of developers and their lobbyists should be removed to ensure that any decision to rezone this lane is only in the best interests of the public and does not involve a transfer of wealth from the public to private hands.
- 114. The consultation guidelines also state that the community should also "be at the centre of all planning and design;" however, I do not recall Transport for NSW actively seeking out feedback or input on the design and what would benefit the community from established community groups and residents. No genuine consultation with the community has occurred, and this proposal and the short window for submissions is evidence of this. It is very clear that Transport for NSW has made a deliberate decision to involve the community and the groups

that support us as little as possible in the rezoning proposal development process.

- 115. Further to this, the majority of the organisations who have been engaged by Transport for NSW to provide the technical documents that underpin the proposed re-zoning, also have Mirvac listed as a customer, and have either been previously or are currently engaged by Mirvac to provide services to them. The organisations who are contracted by Mirvac:
  - WSP
  - ARUP
  - Curio Projects
    - Curio have used information gained from their work with Mirvac on the South Eveleigh site to inform their reports issued for this rezoning proposal.
  - AECOM
  - Bates Smart
  - Artefact Heritage
  - Balarinji
  - Hill PDA Consulting
    - An employee of this organisation is an "Expert advisor who consults for Mirvac on bid leadership and tactical advice for complex mixed-use projects."
  - Arterra Consultina
  - Ethos Urban
  - Urbis
- 114. The majority of these reports were commissioned following Mirvac making it's submission in March/April 2021. Information should be provided to the community on what steps have been taken to ensure that active management of any perceived or real conflicts of interest has occurred. This would allow the community to have trust and confidence in these reports. Greater transparency in the rezoning application and reports are urgently required to ensure the integrity of the process.
- 115. There may be concerns that inappropriate privatisation proposals like this are only as a result of a system that is open to exploitation and the power imbalance between the community needs and the profits available from the public to privatisation land strategy of the NSW Government. The governments view that public land is seen as an asset that is valued primarily as a means of generating an influx of money is clearly evident through this rezoning proposal. With this proposal the governments aim is to ensure that they can increase the value of the land so that it can then be sold for the highest price possible to a developer, rather than using the land in a way that best benefits the community.
- 116. The rezoning proposal should not proceed in its current state, and genuine community consultation and a community based needs analysis should occur and be a driving force behind a new rezoning proposal.
- 117. The practice of Transport for NSW intentionally aiming for the broadest rezoning possible for the site with the intention to sell off to one developer fails to consider public interest and the impact that selling public assets into private ownership have. As the developer of the site will have no other significant businesses to compete with they will be able to control prices, costs and site access. This is not in the public interest, and the land should be zoned with only the public interest in mind, not the potential monies that Transport for NSW stand to gain if the rezoning goes through in its current state.

#### U. Indigenous heritage and use of the Mechanical Engineers Building

118. The design guidelines lack any genuine commitment to the Connecting to Country Framework agreed to for this sub-precinct rezoning and consideration should be given as to how to "create opportunities for traditional first cultures to flourish" and that "we will prioritise Aboriginal peoples relationship to country and their cultural protocols, through education and enterprise by and for Aboriginal people." Considering the lack of community space in the rezoning proposal and the importance of meeting the agreed Connecting to Country Framework the rezoning proposal in its current form is not appropriate.

- 119. The Chief Mechanical Engineers Office and surrounding gardens is currently zoned for commercial use, and my view is that altering the zoning to allow for it to be guaranteed community space and adapted to provide genuine "education and enterprise by and for Aboriginal people" is essential. The space could be used as an Indigenous Australian Museum, Library and learning precinct run by local indigenous groups. This building is incredibly close to Redfern Station and very well connected to transport routes making it easily accessible for tourists and will encourage people to visit the area. This would also provide genuine culturally appropriate employment for Indigenous Australians and allow for more people to learn about and have a greater understanding of Indigenous history and culture. The planning documents note the importance of this area for Indigenous Australians, and appropriate adaption of the space is essential.
- 120. By developing highly attractive tourist and cultural spaces in buildings close to key public transport infrastructure will also support the precincts aim to be a multi-arts centre and the overall vision for the site.

#### V. Use of rail corridor for construction of site

- 121. The current proposal states that all construction traffic should come through minor, quiet residential streets. This is highly inappropriate considering the scale of construction vehicles and materials that are required for a development of this scale. Currently TfNSW use the rail corridor for all of their current site construction. Further the traffic management plan doesn't consider impacts to pedestrians and cyclists during the construction period and the safety hazards this would cause by having high volumes of heavy vehicles where 10,000 people per day pass through.
- 122. A condition and requirement of any development on this site should be that Transport for NSW facilitate and ensure that all construction materials, vehicles and equipment is only transported through the rail corridor. Due to safety concerns and potential local traffic disruptions no use of residential streets should be allowed.
- 123. It is also inappropriate that the Transport Strategy and Transport Impact Assessment states that Shepherd St "maintain heavy vehicle access up to 19m articulated truck" for construction and heavy vehicle transport post site completion even though no safety and impact assessment of this has been competed. Further this would be a significant change to Shepherd Streets current use as a quiet residential street with significant pedestrian and cyclist traffic. Heavy vehicles of this size should not be permitted on residential streets, and the rail corridor should be required to be used.

#### W. Professional Standards in Technical Reports

- 124. All of the supporting technical documents fail to adequately meet their brief, and as a result the information used to support a rezoning of this scale is inadequate and means that it is likely that this rezoning proposal is supported off factually incorrect information. The community should be able to trust that these reports are appropriate and accurate and it is concerning that this is not the case, some examples below:
  - Wind Assessment Study failed to test the development to the full-proposed rezoning scale and height, and based the assessment on the "designers view" provided by Transport for NSW which is considerably smaller than the development allows.
  - Noise and Vibration Assessment Study failed to test road traffic noise in the current state in the correct area of Wilson Street, did not undertake a traffic assessment, did not test traffic noise after hours, did not calculate/assess the impact of traffic & pedestrian noise through the introduction of late night hospitality and live music zoning on all residences along Wilson street, did not test for the noise level impact of the entire site once completed to residences along Wilson St
  - Pollution Assessment Study did not adequately measure the impact of air-pollution during the construction period and any health impacts as a result of increased air pollution, did not measure the impact of light pollution on residences in Wilson Street

- Visual Impact assessment did not consider the visual impact of the proposed development on Wilson Street and made conclusions and assumptions about residents on Wilson Streets views on the impact of the proposed forms against their current views
- **Sky-view assessment** did not test or measure the impact of the alteration of the sky-view for residents of Wilson Street and the majority of residences on Wilson street over all.
- Economic Productivity and Job Creation Study has not adequately considered the impacts of Covid-19, the shift to work from home, technology companies moving to a "work anywhere strategy" and what genuine job creation looks like, and whether the jobs created will be culturally appropriate for Indigenous Australians
- Non-Aboriginal Heritage Assessment study stated that no community consultation occurred.
- Artists Images prepared for the proposed rezoning do not adequately demonstrate the visual and heritage impact of the proposal and are not representative of the proposal through a lack of real views. Please see attached PDF Paint Shop Graphic Objection for more information on this.
- 125. The community has an expectation that these studies are completed to the highest possible standard, and allow us to make a genuine informed decision based on all available information. These studies in this improper state have not allowed us to do so. Studies submitted as part of the proposal should contain accurate and relevant data and not make unfounded assumptions on community opinions.

#### X. Inappropriate mix of commercial and office space

- 126. The allowance of 72.2% gross floor area (GFA) for commercial spaces is inappropriate and not in line with community expectations. The retail spaces in this proposal provide 9000sqm of GFA; however, the retail mix using this space is not in line with community expectations. There is no guarantee that social enterprises, like the Bread and Butter Project, will be able to get access to retail space. These social enterprises support the wellbeing of the community and our most vulnerable residents, and often become a part of the fabric of the community. There should be guaranteed provisions for appropriate social enterprises within the retail mix.
- 127. The retail mix also creates allowances for food and grocery stores which are very welcome in this area of Darlington; however, there is a concern that the grocery space would not be available to small green grocers, independent supermarkets and butchers by the supporting study proposing metro stores from Woolworths and Coles. This will instead worsen the monopoly that the major grocery retailers have on the food market in the area. Carriageworks has successfully run a curated social food market that supports small business and my recommendation is that this protection for small businesses continue throughout the food and grocery space in this rezoning proposal.
- 128. The Economic Assessment also refers to the impact of Covid-19 on reducing demand for commercial office floor space. The report states that 42% of workers wish to work from home following Covid-19; however, they still expect that high levels of commercial office space will be required in the site that aims to become a tech hub and attract technology workers. This is in direct contraction with the change in employee value proposition of the majority of technology firms as a result of Covid-19 which have shifted to a "work-anywhere" strategy. These employers have also shifted their hiring practices accordingly and are moving to a fully remote or hub-based office model. I do not believe as much of this space should be dedicated to office space for knowledge workers, as it is likely that the space will not be used and it will become a deserted unattractive area in the long-term. This same report also states that there is an oversupply of office space. There is also no clear demonstration of how any office space in this area will improve the economic outcomes of this site and whether this space will actually encourage "innovation." The rezoning proposal needs to be radically re-thought in line with the changing nature of work.
- 129. Further, commercial office space usage in Australia is at record lows and it is unclear how 103,700 sqm of commercial space vs. 39,000 sqm of residential space is appropriate.

130. The Planning Report suggests that a governance framework be put in place to "curate the mix of firms and services" however, the design guidelines do not mandate this. As the plan is for this space to be privately owned by developers there are no guarantees that a strong framework be put in place to protect the design of the area, rather it is likely that commercial interests and future profitability for the developer will take over.

#### Y. Lack of community consultation and inadequate time to respond

- 131. There has been a complete lack of community consultation, and the majority of the residents in the area are unaware of the scale and possible outcomes of the proposed rezoning even though there is potential for this to significantly impact them.
- 132. Further minimal time has been provided by Transport for NSW for residents to adequately review the planning proposal. On top of this, the short deadline for submissions has resulted in us not having nearly enough time to engage our own experts to conduct appropriate impact assessments and reports on the rezoning, or submit any freedom of information requests relating to this proposal. Residents of Wilson Street and the surrounding community will be actively working together to express our concerns on this proposed rezoning and any future development proposals put forth for this site.

#### Z. Car-share spaces and car parking

- 133. The reports note that residents in this area have lower levels of car ownership compared to Greater Sydney. The proposal includes car-share spaces be provided at 1 spot per 700 square meters of GFA. This should be increased to a higher level to encourage less residents to have cars, as a high-level of car-shares are available and accessible to suit the needs of residents. As per the Transport Strategy and Transport Impact Assessment only one car share space has been allocated in the on-street parking in this development. This is highly inadequate.
- 134. The rezoning proposal also states that parking rates should be reduced in the sub-precinct to encourage alternative modes of travel; however, it fails to recognise that in doing this all it will do is push commuters, visitors and residents to park in the surrounding streets. Residents in Wilson Street and the surrounding area already struggle to find adequate parking close to our homes due to commuters and visitors to carrigeworks parking in the street. No consideration has been given to the flow-on impact this development would have on parking in the surrounding area.
- 135. The Transport Strategy and Transport Impact Assessment study states that there will be a "47% reduction in peak hour trips (car)" compared to the 2008 proposal study however, no genuine traffic assessment and modelling has been completed. This proposed development has a 39% increase in allowable floor space and expects significantly more people to use the site every day, so I am unclear as to how a reduction vehicle trips could occur, and why this reduction was based solely on the reduction of parking spaces. Further, the study has failed to adequately consider the volume of ride share/uber trips that this space would generate. It seems to me that the trips into the site will only lead to an increase in trips on surrounding streets, such as Wilson St, with drivers circling around looking for parking. It is entirely inappropriate to suggest that a reduction in car trips will occur rather they are just being pushed to local residential streets.
- 136. The Transport Strategy and Transport Impact Assessment study only considers AM and PM peak hours trips to/from the site, and fails to address and consider outside of peak hour trips even though this proposal states the governments aim to turn this area into a "24-hour" precinct. A proper traffic impact assessment needs to occur that assess' the full extent of the impact of traffic at all hours of the day and includes the impact to surrounding local residential streets.
- 137.I refer to 3.5.2 in the Transport Strategy and Transport Impact Assessment that states that local streets "often have important local place qualities. Activity levels are less intense; however, these streets can have significant meaning for local people." Wilson Street, Ivy Street and Shepherd Street residents enjoy our quiet street and the opportunities for fostering and building

connections that this allows us. This proposal and resulting traffic and noise will destroy the community nature of our streets and determinately impact the local place qualities our street has. A different proposal is required to ensure that residents are not adversely affected by this proposal and any resulting traffic.

- 138.Residents in the area do encourage and support increased usages of public transport and cycling infrastructure to encourage lower usage of cars. However, the benchmarking of parking levels in comparable sites in 4.7.1.2 of the Transport Strategy and Transport Impact Assessment states that all other developments (inc. Barangaroo, South Eveleigh, Blackwattle Bay, North Sydney Council DCP and the original 2008 proposal for the site) have greater levels of parking per square meter of GFA than this proposal. This is concerning as no work has been done to understand the flow-on impact of these lower levels of parking would have on the surrounding area. More work should be done to ensure that the proposed parking rates and accompanying transport strategies do not have an adverse impact on residents ability to access parking in their own streets.
- 139. It is concerning that the development will only mandate 5 accessible parking spaces be built across all of the parking (residential and non-residential) on the site and in no way does this level of accessible parking ensure that individuals who require accessible parking will have adequate access to the site.
- 140. All of the proposed "Standard Car Parks" in the rezoning area should be time restricted, exempting residents who are currently eligible for permitted parking.
- 141. There is a proposed taxi rank on the southern side of building plot F, which is immediately adjacent to the bedrooms and living spaces of Wilson Street. This is an inappropriate spot for a taxi rank as it will increase late night noise and traffic in the area and detrimentally impact residents right to peaceful enjoyment of their homes. There are also concerns on whether this would impact on the overall privacy and safety of Wilson Street and the residents. The proposed taxi-rank should be moved to an alternative location.

#### AA. Lack of bridge connecting North and South Eveleigh

- 142. This proposal makes reference to providing a space for a bridge that connects North and South Eveleigh; however, does not provide a commitment and mandate that a bridge be built connecting the two sites. There has been long running community support, and support from the owner of the South Eveleigh site (Mirvac) for a bridge to connect the two destinations. Without agreement as part of any rezoning proposal that Transport for NSW be required to build a pedestrian and cycle bridge connecting the two sites, it is unlikely that this will ever be built.
- 143. The Transport Strategy and Transport Impact Assessment study states that "a second pedestrian rail crossing via a bridge or the reuse of tunnels between North and South Eveleigh" is required to maximise the precincts connections and enable the vision for the site. Further this same study notes that "existing commute data indicates that key original and destinations are located within 5km of the precinct and along existing rail corridors." If a bridge is essential to ensure good site connectivity, and that the majority of existing trips to the site are coming from within the rail area including on the other side of the rail corridor, it is concerning that a bridge will not be mandated as part of this development. A bridge will support and encourage active transport (walking & cycling) over car use, which is essential in addressing some of Darlington residents concerns on vehicle traffic coming into the area.
- 144.Building a bridge will also support and encourage the use of the new Waterloo station for students who will attend Sydney University by reducing their walk between the station and university by around 10 minutes. It will also provide a safer connection between Waterloo station and the university for pedestrians.
- 145. The Social Infrastructure Study and Health Impact Assessment report notes that with the forecasted 6.1% increase in population per annum to the surrounding area, to support this growth a bridge between North and South Eveleigh is a future improvement on the current proposal. As this report states the areas population will continue to grow the bridge should be built at the same time as the redevelopment to ensure that the site is future-proofing for

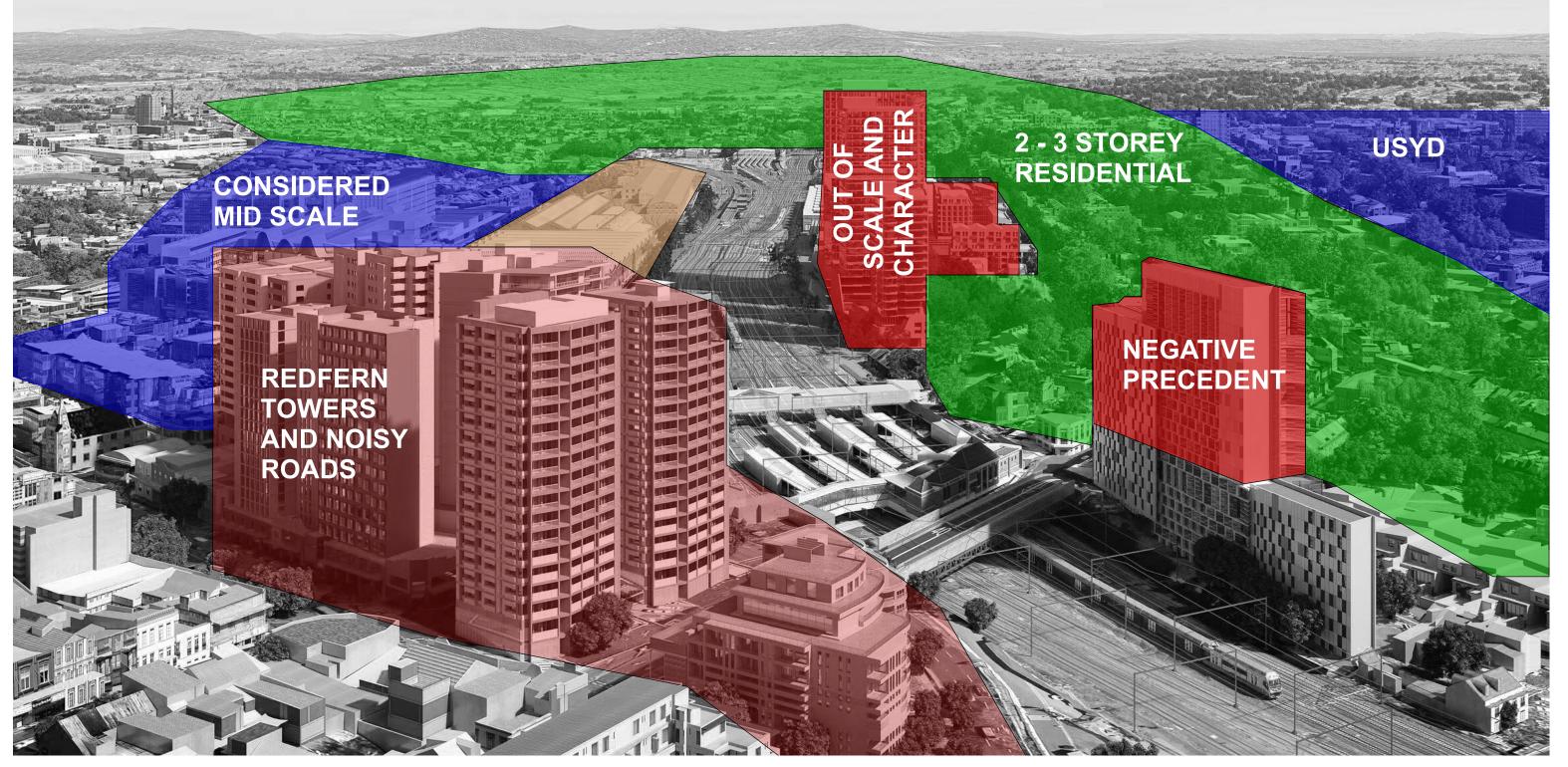
significant increases in pedestrian and cycle traffic.

- 146. There was a contribution plan set up in 2006 to collect developers contributions on all Redfern Waterloo Authority (RWA) zoned sites, which included funding for "design and construction of a new pedestrian and cycle bridge between north and South Eveleigh." It is concerning that there has been funds collected to develop a bridge, yet somehow a bridge has never materialised. Information on the status of these funds should be provided. Further to this, the current proposal does not require a bridge be built even though there has been monies collected for a bridge.
- 147. It is imperative that a bridge connecting North and South Eveleigh be mandated as a part of any rezoning proposal to support site connectivity, pedestrian traffic management, and pre-existing community commitments.

#### BB. Overall comments on the proposal and private ownership of the land

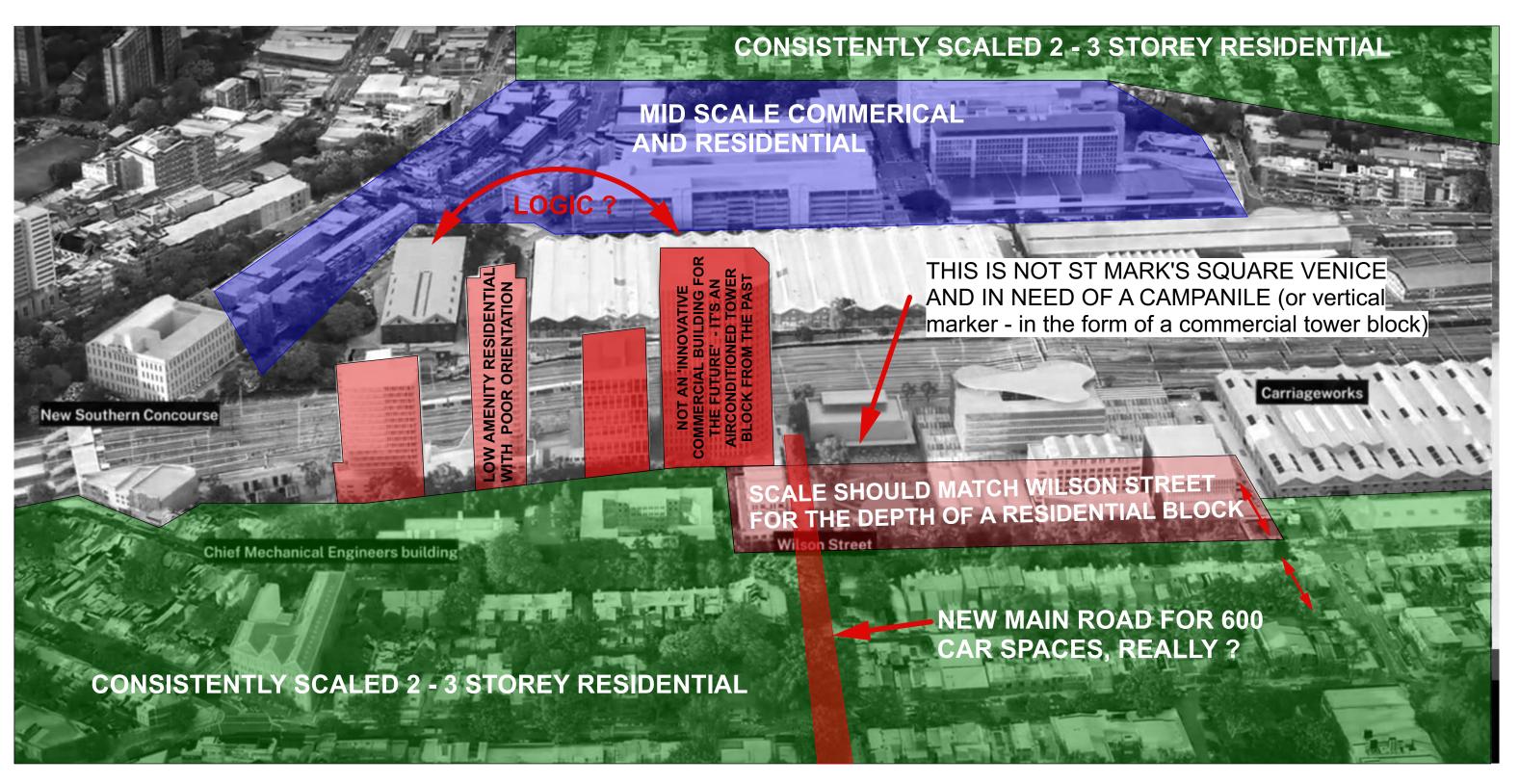
- 148. This proposal very clearly demonstrates that a lack of community consultation has occurred and community and environmental needs have obviously not been considered. The sale of this land is clear to all members of the community that this is a money grab by the NSW Government. The re-zoning is to be as broad as possible, and offers no guarantees that any land be public open space. This is most concerning and incredibly disappointing.
- 149. The government has the opportunity to be at the fore-front of designing for the future in a climate and community friendly way that would be seen as progressive and world-leading if a different view was taken with this proposal. The government has the opportunity to regenerate this under-utilised open space and turn it into a much-needed housing, community and green recreational safe play, and sports area that meets the needs of the community by the land remaining in public hands. It might not return the cash to the government; however, the benefit to the community would be priceless. There would be measurable positive impacts to community health and social outcomes if the proposal was significantly altered to include and mandate recreation, and community space, as well as, a reduction in building height.

# VIEW SELECTED BY PROPONENTS TO MINIMISE VISUAL IMPACT OF NEW TOWERS AND MAKE THEM LOOK CONNECTED TO OTHER TOWERS - NOT REPRESENTATIVE OF THE SITUATION - IMAGE MISLEADING



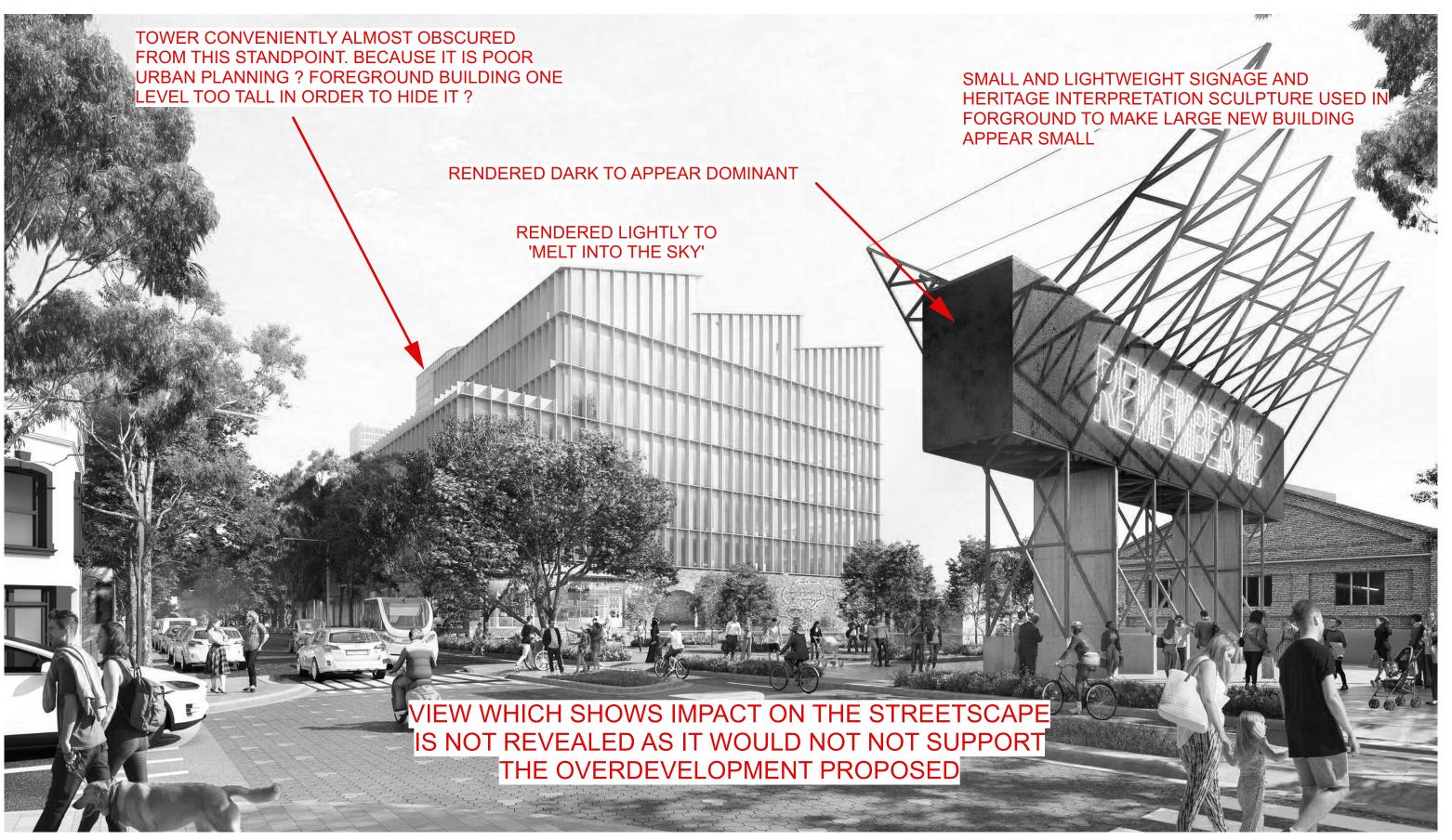
THIS PROPOSAL REPRESENTS AN URBAN DEVELOPMENT TYPOLOGY WHERE RANDOM TOWERS ARISE BECAUSE POLITICS AND MONEY OVERIDE COMMUNITY & DEMOCRACY, COUNTRY AND PLACE.

# **INCONGRUOUS MASSING AND MUDDLED USES - OVERDEVELOPMENT**



PROPOSAL MIS-PRESENTS URBAN CONCEPTS OF RESPECT FOR HERITAGE AND COUNTRY IN ITS STATEMENTS.
RESPECTING HERITAGE WOULD DEMONSTRATE CONSIDERATION OF THE SCALE OF WILSON STREET.

# ALL MISLEADING IMAGES GENERALLY DO NOT REPRESENT THE IMPACT OF THE SCALE OF NEW BUILDINGS ON WILSON STREET



WHY NOT PREPARE IMAGES WHICH ARE NOT JUST FOR TFNSW MARKETING?
LETS TAKE A LOOK AT ACTUAL URBAN IMPACT ON THE HERITAGE STREETSCAPE

# MISLEADING IMAGES GENERALLY DO NOT REPRESENT THE IMPACT OF THE SCALE OF NEW BUILDINGS



WHY ARE "INDICATIVE VIEWS" BEING SHOWN TO THE PUBLIC - IMAGES SHOULD BE AS REAL AS THEY LOOK

### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 8:20 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** north-eveleigh---paint-shop-4.docx

Submitted on Thu, 25/08/2022 - 08:16

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# Name

#### First name

Bruce

#### Last name

Lay

I would like my submission to remain confidential

No

# Info

#### **Email**

#### Suburb/Town & Postcode

Newtown

#### Please provide your view on the project

I object to it

#### Submission file

north-eveleigh---paint-shop-4.docx

#### **Submission**

attached

#### I agree to the above statement

Yes

SUBMISSION: TAHE

NORTH EVELEIGH: PAINT SHOP SUB PRECINCT ISSUES

August 2022

We fully endorse the analysis and expected submission from REDWATCH for this site while making comment on the issues and particulars. We have lived in the area for 44 years participating in many debates about the future. Bruce is also architect, planner and heritage specialist, Sarah's expertise is mathematics and education. We have restored a heritage building across from this site.

1. Planning is supposed to be a level playing field, the rules should not depend on land ownership and should be broadly consistent with their context. The decision maker should be impartial, not have a vested interest, and should seek a balanced judgment in the community interest. This is a major problem here as the applicant serves the land owner, the State government, it is leveraging public land for profit not for best use in the public interest. Lets call it what it is; corrupt planning. The City of Sydney is outside this loop, is an independent arbiter and should be the decision maker. This has compromised the approach to this site including the 2008 consent, which also ignored the local concerns. This plan starts with the 2008 consent and essentially more than doubles it in terms of height and density. We have been swamped with documents from different consultants and specialists. This is a reductionist approach with considerable redundancy. Even for a professional seeking to understand a plethora of often conflicting information is confusing, perhaps deliberately so. This is not a serious consultation.

This follows a familiar pattern as with the Waterloo Estate redevelopment driven by greed, not the public interest, or respect for context. With Waterloo the City has gone into bat to seek better outcomes in terms of urban design, the public domain, and the quantum of social housing.

- 2. We should not accept the 2008 consent as a starting point or at least should be subject to review, but should seek a scheme which is consistent and compatible with the context, which also seeks benefits, and minimises harm. Development consents vanish after 5 years or should be reviewed.
- 3. This area is called the Tech Central Innovation District: what humbug. It is an office park with some housing, maybe 15% affordable, no social housing. It is proposed to become B4 mixed use commercial/industrial to be changed to an employment zone in Dec 22. This is more flexibility for marketing a public asset, but much denser than the norm for the B4 zone. The former ATP sold without strings to MIRVAC is now an office park, principally for the Commonweath Bank: hardly a hub of innovation.

4. It is instructive to compare this area with the Ashmore Estate redevelopment of industrial coordinated by the City. There are fewer heritage constraints at Ashmore. While every bit as dense as is proposed here up to 8 stories, the form is vastly different, respectful of the street structure, engaging with the streets and public domain, with some non-residential and community space to activate the street edge, with good parks and landscaping and linkages and limited sub-grade parking.

#### 5. Heritage/Character

This area is within a matrix of Heritage Conservation Areas of Local significance. This area is of State significance requiring more rigorous protection that the surrounds, not less.

The whole of this site is heritage, principally embodying our railway history, important to the nation as well as the state and this area. The proposal misses this, is totally disrespectful, and an erasure of things we value.

This site has the very strong discipline of railway engineering, a discipline of mostly rectilinear geometry, arched bricky buildings, a rhythm of gables etc. Insertion of the fly towers into the Carriageworks was respectful, delicately giving a new life and modernity to the complex. Hanging a huge box for unspecified commercial use over the Paint Shop, and a similar box onto Wilson Street is not respectful, it is vandalism.

Wilson Street has a strong formal discipline mostly of terraces. This scale and character should be respected also.

Another layer of this history is the 'skippy girls' painted on the iron fence a delicate touch on this tough utilitarian fabric. It also needs to be respected. The plan is silent on this also. This plan, is not planning, is it real estate marketing of the crudest kind. They did this for Waterloo as well, the City came back with a pragmatic response to the greed, but which is more respectful of the public domain, with a better scale (excepting a few towers), more useful open space and more social housing. We need to expect the City to do similar here; even better.

The whole of the site is important, both sides of Eveleigh had a major role in the making of the railway system in NSW and Australia, the most important composite in these terms of evident State, if not National significance. So says the many heritage assessments including the recent CMP revised this year for this application. The current controls which pick up some of the Heritage Items is reductive and ignores the whole. The adjoining areas are all Conservation Areas with Heritage Items, embedded. For example, the scheme acknowledges the fan of tracks, as a decorative theme in the public domain, nice, but the level of development over and under the heritage fabric leads to substantial erasure. There is archaeology over the whole site, the whole should be a Heritage Item,

not selective bits, it is an entity. They make most of discrete buildings Heritage Items. The whole should be following normal heritage practice should be a Heritage Item. Or like all of the context be a Heritage Conservation Area, with embedded Heritage Items, including the extensive archaeology.

TZG architects did a fine job with their addition to the Carriageworks as the fly tower for the theatre. This approach may be fine for the Paint Shop for compatible adaptive re-use. But not for the proposed elevated box for unspecified commercial use. This is not compatible adaptive re-use of a heritage building, apart from the huge bulk looming over the whole. This massively impact on views within the complex, as well as from Wilson Street and surrounds.

Contrast this with MIRVAC's approach on the former ATP – coherent, mostly respectful in terms of scale, long horizontal forms, disciplined geometry and character. The urban design is admirable the use has been thwarted. Both ends must be served.

The existing character reflects the grand vision and rigour of Victorian engineering, a compelling geometric and a mostly rectilinear discipline, worthy of respect and emulation. There is no sign of social purpose with this proposal except to maximise the leverage of state land. The proposed lumpy aggregation of object buildings totally lacks coherence and respect. It is real estate opportunism that it is unlikely that even MIRVAC would support. While the Platform Apartments jump the scale, this is more respectful as a punctuated brick building which provides a key for development elsewhere, including the Paint Shop.

#### 6. The Public Domain

Wilson Street is a classic Victorian street, very fine, mostly a pattern of terrace housing two storeys but rising up to 10 m to ridge lines; broken only at the cross streets. The fall to this site, about 4m gives scope for a 3/4 storeys without violation of the scale. Introducing a huge building at Codrington is a violation: appalling to the street, but more so in closing the vista along the Carriageworks Way to Redfern, as well as clear and rational access to the Station. The proposed arcade so close to Redfern Street is a bad idea rather than to continue the existing pattern. It will fail, as the itinerant cafes in the Carriageworks have failed.

#### 7. Scale

It is logical on this site to step up to the southern edge, for sun as well as character, and to align higher buildings against the Line. The scale adopted by MIRVAC on the other side is appropriate to the character, as well as amenity, sun, and microclimate, not the march of massive towers as object buildings proposed here. A continuous mid-rise form is better in urban design and

microclimate terms, as well as serving as a noise wall against the western line, the busiest in the city.

#### 8. The Numerics

The biggest cheat remains the numerics, calculating the floorspace over the gross including the open space, roads. The planning norm of the nett should be used; the open space so zoned and the public domain, excluded. This underpins the bulk and height. The former Ashmore Estate development with the City's assistance has done better including the St Peter's Village development, up to 9 stories with some retail under and to Mitchell Road. This is on former industrial land with contamination issues but lapped up by developers. This is evidently viable so why not on Eveleigh? This demonstrates that very high densities can be achieved with low and medium rise, avoiding the cluster of disparate towers proposed and the adverse impacts.

The FSR and heights were a gigantic fudge with the 2008 scheme. Applying the FSR on the whole including the public domain and open space breaks the rules for density calculation. This effectively more than doubles the potential yield. It should be applied to the nett developable land as applies to private land. Hence, the huge shift in scale and gift to treasury This is corrupt planning. No doubt this is the main purpose here. The maximum FSR cited is 2.78:1, but the actual is at least twice this. The existing residential is about 1:1, hence the array of towers in a low rise precinct of heritage conservation areas with a myriad of Heritage Items. It is vandalism.

#### 9. Open Space

While there are fine parks in the district, Sydney and Victoria Park for example, this area is very deficient in terms of local walkable open space. Hollis Park the only quality park in this area, is loved to death, with frequent renewal of the grass required. North Eveleigh has become a mecca during the lockdown including the Paint Shop precinct. Keeping the fan of tracks should not preclude deep planting. A grid of trees can complement the structure and formality of the precinct and make it inviting and comfortable to use. Ballast Point Park is a good example of a former industrial site respectfully converted to parkland. With this site the State wanted erasure, the community and Council thought otherwise. This is a wonderful outcome from a collaborative approach.

#### 10. Traffic/vehicular access

With the 2008 Plan they stuck pragmatically to the only access at the western extremity off-set with Queen Street. This is an uncontrolled and dangerous mix of cars, bikes, and pedestrians, but workable with low volumes. We hired Chris Stapleton, as a reputable traffic consultant to advise on the access. He endorsed a connection at Golden Grove including some ramping down onto the site. This

was rejected as impracticable, too steep. The irony is that it now appears to be OK at Shepherd Street, the same grades.

#### 11. The North/South connection

This has been the elephant in the room with the serial masterplans prepared to date raised by REDWATCH and many others. This is an essential pedestrian and cycle connection. It should not be vehicular. It must be delivered this time. All of the planning studies including the CMP raise it as an issue to be resolved.

#### 12. Design Competition

The City will require a Competition for this site. It would be better to abandon this half-baked scheme and proceed to do it now. Let us not repeat the Waterloo fiasco where the City actually arrived at a much better scheme, with its ear closer to the ground and more hands on design skills without the huge conflict of interest in terms of ownership.

#### 13. Integrity

Both ICAC & the EDO have a role in ensuring that a duty of care is exercised on such development sites.

Bruce & Sarah Lay

#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 8:18 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 08:18

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## **Name**

#### First name

Mila

#### Last name

Baturevych

#### I would like my submission to remain confidential

Nο

# Info

#### **Email**

#### Suburb/Town & Postcode

2043

#### Please provide your view on the project

I object to it

#### Submission

The hight and scale of this proposed development doesn't fit into the area. It doesn't consider the local environment and residents. It is clearly suppressing the current arrangement of the suburb.

A re-work should be done to find a solution of significantly smaller height before this can proceed to the next stage.

#### I agree to the above statement

Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 8:07 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 08:06

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

#### First name

Allison

#### Last name

Dibben

#### I would like my submission to remain confidential

Nο

# Info

#### **Email**

### Suburb/Town & Postcode

South Eveleigh

### Please provide your view on the project

I object to it

#### **Submission**

As a member of the local community, I am concerned that the current proposal is vastly different to the original proposal in 2008.

I am not opposed to a development, however the sheer height and size needs to be reconsidered.

The vast scale of this project will have a significant impact on the local community.

There needs to be greater community consultation to ensure heritage significance of the site remains;

Consultation with local first nations people needs to be a priority;

Sufficient affordable housing needs to be allocated;

Local consideration to noise and traffic impact;

There needs to be a connection between North and South Eveleigh;

There needs to be more consultation with the local community and council.

# I agree to the above statement Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 8:00 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 07:59

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Steven

#### Last name

Walker

### I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2043

### Please provide your view on the project

I object to it

### Submission

Whilst I am not against progress, this submission is excessive and not conducive with the surrounding area. I object to this particular development.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 7:54 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 07:54

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Billy

### Last name

Haworth

### I would like my submission to remain confidential

No

# Info

### **Email**

# Suburb/Town & Postcode

Darlington

### Please provide your view on the project

I object to it

### Submission

Please don't ruin the character of the neighbourhood.

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 7:51 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 07:50

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Justine

### Last name

Simpson

### I would like my submission to remain confidential

No

# Info

#### **Email**

### Suburb/Town & Postcode

Alexandria

### Please provide your view on the project

I support it

### Submission

Increased density within the heart of our city, affronting public transport is vital for the future sustainability of our city, however, this development needs more affordable housing.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 7:37 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 07:37

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Robert

### Last name

Stevens

I would like my submission to remain confidential

Νo

# Info

#### **Email**

### Suburb/Town & Postcode

Darlington

### Please provide your view on the project

I object to it

#### Submission

I have lived in Wilson St Darlington for 22yrs. I object to the change of the bulk and scale increase of the planning from the 2008 proposal which we felt was very intrusive anyway. it should no go over 9 storeys high. The amount of cars owned by people will just crowd out our streets and create massive traffic problems. The size of the tower is monstrous and will over shadow much of our street.

I want to walk the streets see blue sky and not be looked down upon and spied upon from people living in such a horrible high rise building.

There needs to be much more green open space and trees and bushes to bring bird life back to the suburb. Also social and affordable housing needs to be at least 25% of the project.

I want to be able to bring my Grandchildren to my home and be able to enjoy parkland and open spaces with my kids.

I do not want to see a return to Ghetto living and mass crowding of the local area.

I OBJECT STRONGLY TO THE LATEST PROPOSAL from Dept of Planning and Environment.

#### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 7:13 AM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 07:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Patrick

#### Last name

Hay

I would like my submission to remain confidential

Νo

# Info

#### **Email**

# Suburb/Town & Postcode

2043

### Please provide your view on the project

I object to it

#### **Submission**

Further to my comments provided on 8 August I'd like to add some additional comments.

Having seen the scale models on display at the City of Sydney, it is clear the bulk and scale is excessive given the surroundings of predominantently 2 storey buildings on Wilson Street.

In addition to my previous comments in support of additional housing located near public transport, I'd also like to add that at present, the surrounding areas is fantastic for pedestrians abs cyclists due to the great work the City of Sydney has done. Wilson St and Abercrombie St are good examples of this. In addition to the consideration of traffic impacts in Darlington, I'd imagine there will also be impacts heading toward Erskineville, through the back streets via Burren and Charles towards Erskineville road. These already mostly narrow streets get a bit of the rat run in the mornings, despite Council attempting to reduce discourage traffic.

My final point is that it seems obvious that TAHE is on a selling spree, with a lot of public land being proposed to be sold off to balance the books. Public land is a great place for social and affordable housing and that is not disputed in my view, however more thorough consideration is required for this site.

### I agree to the above statement



From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Monday, 8 August 2022 9:06 AM

To: DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Mon, 08/08/2022 - 09:05

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

### First name

Patrick

#### Last name

Hay

I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

**ERSKINEVILLE** 

### Please provide your view on the project

I am just providing comments

#### **Submission**

The overall premise here is right, but what is being proposed isn't quite there yet.

Wilson St and Darlington is a fantastic in-tact Heritage Conservation Area. The curtilage is incredibly important. What is being proposed currently doesn't appropriately reflect this and is disproportionate.

### A couple of points to put forward:

- Revitilisation of the Precinct is certainly warranted. Expanded commercial and retail uses will provide more walkable options for residents of Darlington, which is much needed.
- Proposed building concepts are too bulky and realistically too high. Suggest heights no more than that of the South Eveleigh redevelopment, perhaps more, but 28 is excessive considering the western surrounds.
- -Affordable housing component is too low. Particularly on a State Government owned site, there should be a larger mix of Social AND Affordable Housing. 20-30% minimum. Australian inclusionary zoning standards are poor compared to other countries around the world, the NSW Government needs to take the lead on this and get people out of rent stress and off social housing wait lists.

The premise for locating housing next to train stations is a very good one, however it's important to recognise trains in Sydney don't go quite everywhere. For the purposes of work and play, most of that is covered (you can get to the CBD, head down the coast, to the mountains etc.). But one critical link is missing - connectivity with waterways and beaches. If the NSW State Government is to continue to incredibly densify around train stations, trains must be able to go everywhere, bus services to beach and harbour swim spots are lacking to say the least and Sydney is known for it's coastal and beach culture in the warmer months

(and when it is not raining). In this context, there would be reasonably significant impacts on already busy roads (Cleveland St, Botany Road etc.) because quite simply, many people will still own cars and still drive, regardless of Redfern Stations very good transport links.

Look forward to seeing a revised proposal in due course.

# I agree to the above statement

I can be contacted on

From:	Planning Portal - Department of Planning and Environment <a href="mailto:noreply@feedback.planningportal.nsw.gov.au">noreply@feedback.planningportal.nsw.gov.au</a>
Sent:	Thursday, 25 August 2022 2:14 AM
To:	DPIE PDPS Redfern North Eveleigh Mailbox
Subject:	Webform submission from: Paint Shop sub-precinct rezoning proposal
Attachments:	512-wilson-stnorth-eveleigh-paint-shop-rezoning-submission.docx
readiments.	512 Wilson St. Hortin evereigh paint shop rezonling sabinission.acex
Submitted on Thu, 25/08/2022 - 01:59	)
Submitted by: Anonymous	
0.1.39	
Submitted values are:	
Submission Type	
I am making a personal submission	
Name	
First name	
Jo	
Lastmana	
Last name Devery	
Devery	
I would like my submission to rema	nin confidential
No	
1 <b>f</b>	
Info	
Email	
Suburb/Town & Postcode	
Darlington 2008	
Please provide your view on the pr	oject
I object to it	
Submission file	
512-wilson-stnorth-eveleigh-paint-s	hop-rezoning-submission.docx
Submission	
Submission from Wilson Street, D	Parlington NSW 2008
	and the second of the second o
I have attached a document outlining precinct.	my concerns with the rezoning and proposed development of the North Eveleigh Paint Shop
p. 00m0t.	
	height of the proposed buildings are too high and should be capped at 9 storeys; the
precinct entrances Shepherd St, Ivy L	ane and Little Eveleigh Street should be moved to a more appropriate location; appropriate

traffic and noise studies need to be undertaken and circulated to the public; open space, recreational, community & cultural spaces needs to be increased and mandated and that any proposed development respects the existing heritage in the surrounding area.

for further clarification.

# I agree to the above statement Yes

24th August, 2022

To Whom It May Concern,

RE: North Eveleigh Paint Shop Proposal

I am writing this submission as the owner and resident of Wilson Street, Darlington NSW 2008 regarding the North Eveleigh Paint Shop Proposal.

I have concerns about the proposed rezoning and redevelopment of the North Eveleigh Paint Shop site. My home sits directly opposite the Chief Mechanical Engineers Building and as such will be significantly and detrimentally impacted as a result of this development in its proposed form.

The concerns I have are as follows:

### Height of buildings are inappropriate.

The height and storey restrictions of the proposed buildings are not appropriate for the area and are not aligned with the area's status as a conservation area. The scale of the buildings K2, L1, P, K1, E1, E2 and possible addition above the Paint Shed is excessive, against the design principles and not in keeping with the character of the area.

The Public Domain, Place and Urban RNE Design Masterplan, Section 5.1.2. refers to the Innovation Precincts Building Typologies and stated that there are "tall buildings in successful districts setting precedent for height' however, the comparable buildings referred to were significantly smaller in both actual height and number of storeys than is being proposed in this re-zoning, specifically the Foundry in South Eveleigh is six storeys and the Sydney University Business School is seven stories. If these buildings are the height precedence for the area, all building heights in this proposal should be reduced and should be no higher than 9 storeys.

The proposed of building heights of up to 128.8m is not in line with recent development in South Eveleigh, or the Carriageworks and the design principles should be extended to consider the impact on these buildings and sub-precincts. The re-zoning should only allow for heights that are similar to what has been approved and constructed in South Eveleigh and Carrigeworks to continue the appropriate design that has been successful in these areas. All new developments should be capped at 9 storeys.

The proposed maximum height of buildings on Wilson Street being 58.2m is not appropriate for a conservation area that is currently a primarily residential street and is not in line with the current residence design of terrace housing and low-rise set-back apartment buildings. The vision of the North Eveleigh re-zoning is for the new buildings to be built positively into the surrounding urban fabric. This will not occur if the development occurs at its proposed building height limits and the height of all buildings should be capped at 9 storeys.

The current floorspace ratio of 2:1 should also remain, and not be increased to the proposed level of 2.78:1 and all open space should be removed from the allowable floor space ratio for development to ensure that the buildings & development plots do not get floor space that would be deliberately imbalanced against the entire site.

Precinct entrance at Shepherd St, Ivy Lane and Little Eveleigh Street

The introduction of new access points off Shepherd St and Ivy Lane and Little Eveleigh Street are inappropriate and create a major safety hazard for pedestrians and cyclists on Wilson Street. All streets surrounding the Paint Shop sub-precinct are quiet residential streets that get greater foot and cyclist traffic than vehicle traffic.

The recently completed cycleway along Wilson Street forms part of the City of Sydney's Cycling Strategy and Action Plan and is used by countless cyclists every day. To have the entry to the proposed precinct cross this cycleway is unsafe and contradicts the City of Sydney's masterplan to provide a safe cycling network across the city. Having the entrance and exits onto this precinct via narrow residential streets crossing busy pedestrian and cycleways, without consideration of safety is irresponsible and an example of poor planning.

Other access points should be considered for the primary access, including linking up to the existing Carriageworks Way to ensure vehicle traffic does not create safety hazards by crossing pedestrians and bicycle pathways. An approach similar to the entrance constructed on the South Eveleigh site onto Mitchell Rd and Henderson Rd is appropriate as there are existing main roads with traffic lights that could accommodate an increase in vehicular traffic. Wilson Street, Shepherd St, Ivy Lane and Little Eveleigh St cannot accommodate this. It is inappropriate to make these major site access points off minor quiet residential streets.

Further, consideration should be given to the extra 10,000 pedestrians that are expected to be walking down Little Eveleigh St, Wilson St, Shepherd Let, Ivy St, Ivy Lane and Codrington St each day as a result of the Southern Concourse construction at Redfern Station, the introduction of the Waterloo station and the potential increase of pedestrians once all students return to face-to-face learning. This proposal should be considered against the Southern Concourse construction and pedestrian movements.

### Inadequacy of traffic and noise studies

The traffic and noise studies that support this rezoning application are inaccurate, and in the instance of a traffic study non-existent. The design guidelines are therefore based off missing or misleading information.

I refer to the Noise and Vibration Assessment Study where it states that no traffic studies were undertaken, and therefore the assumptions on current vehicle trips of 350 during the AM peak hour are invalid and not appropriate to use as a reference point. The report equally does not consider the traffic impacts on bringing a major precinct access point into the quietest end of Wilson Street (between Shepherd St and Ivy St) that currently has the least amount of traffic. This area is likely to experience a significant increase in vehicle traffic if the re-zoning goes ahead and is not in line with community expectations of a quiet residential street.

Considering that the assumption on current vehicular use of Wilson Street is invalid. The assumption that the AM peak hour trips would only increase to 520 trips and would have a negligible impact by increasing noise by <2dB(A) is also invalid. My view is that there would be a significant noise and vehicle trip increase during all times of the day and night as a result of this proposal.

The proposal also does not consider the impact on vehicular trips outside of peak hours that would increase as a result of the zoning to make this a "24-hour" precinct that allows late-night venues. A further traffic assessment that considers the impact of introducing restaurants, bars, cafes and late night venue traffic and bringing this traffic onto a quiet residential street is essential in order to adequately consider the traffic noise impact.

In the current form it is likely that residents of Wilson St will get a significant increase in traffic noise at all hours of the day, which does not allow for peaceful enjoyment of our homes. With the expectation that over 700 residents and 6000 workers will be in the area every day, along with "visitors" to the retail, hospitality and community facilities there will be more noise impacts than currently outlined. The design principles are inadequate in relation to traffic noise, and if they were adequate would not support a development of this size being inserted into a residential area. The traffic noise plans also do not account for the volume of waste management services that will be required to service the site.

The road traffic noise intrusion assessment that occurred out the front of 418 Wilson St on June 16 - July 7 2021 states recorded traffic noise is 53dB(A) during the day and 46dB(A). The area selected for the road traffic noise intrusion assessment is inappropriate as it is not the part of Wilson St that will be most affected by road traffic noise. The assessment should have occurred on Wilson St between Shepherd St and Ivy Lane.

I also note that the Noise and Vibration Assessment Study sates that the noise is unlikely to impact the proposed new residential buildings, but nothing is recorded on the impact on the current residential dwellings. Therefore, the design guidelines and rezoning are inappropriate on the basis of traffic noise impact to existing residents. The noise controls are also not adequate for a residential area where construction of a site is expected to last 8-10 years. The proposal allows for construction to begin at 7:00am, whereas City of Sydney recommends a start time of 7.30am in residential areas.

# No guaranteed open space or recreational area

The request to re-zone the entire site as mixed-use and does not guarantee that the areas in the plan listed as "open space" be zoned as "recreational area". If the entire site is "re-zoned" as mixed-use with the proposed density and floor space ratio there is no guarantee that the spaces marked as "open-space" will actually be maintained as open space. It would allow the developer to put buildings on and commercialise the open space. Appropriate zoning of "recreational areas" should be applied to these spaces to guarantee that they can only be used for recreation. Using recreation area zoning would also be in line with the South Eveleigh development where recreational area zoning is applied and parkland and sporting facilities are guaranteed for the community.

Further to this, according to 5.1.3 in the Context Analysis, it is stated that there is a void of open space within a 500m radius of the development, and a general deficit of sporting and recreation facilities in the area. It also notes that the available open areas are very small and any increase in density requires a proportional increase in open space. If this development is to bring in what is a likely 10-fold increase of people into the area each day a significant increase in guaranteed open spaces, sporting facilities and safe play areas for families is absolutely essential.

The proposed "open-spaces" does not provide safe play areas for children, especially children with disabilities and mobility issues, and there is no provision for community sporting and recreation facilities. There is also no provision for public amenities such as toilets. The Social Infrastructure Study and Health Impact Assessment report states that a key consideration to improve the health and wellbeing of the area should be "greening the urban environment to support community wellbeing." Without guaranteeing green space through zoning of appropriate recreational areas the development will fail to improve the overall health and wellbeing of residents. It is worth noting that this same report states that the levels of mental health distress in this local government area is higher than other areas, and the lack of appropriate green and outdoor space in this area. There is a significant body of scientific

research which demonstrates that lack of green outdoor space has detrimental effects on mental health, such as higher levels of mental distress, higher stress levels, higher levels of anxiety & depression and higher levels of disease prevalence for both adults and children. Adequate provision of green space needs to be provided in this development, to ensure that an improvement in community health outcomes can be made and the health of the children in the community can be protected.

My recommendation is that K2 and L1 be rezoned as recreational areas and have purpose built sporting and safe play areas built for children. This would still allow for appropriate development to occur on the site, be best connected to the new apartment sites whilst also providing an adequate level of safe spaces for children, families and all residents to use and in keeping with the expectation of an Australian outdoor lifestyle where everyone is able to participate in outdoor sports and pursuits, and meet the design guidelines and renewal principals in full. This will also improve the health and wellbeing of the community, in line with the need outlined in the Social Infrastructure Study and Health Impact Assessment report.

# Inadequate definition of and provision of community and cultural space

The design guidelines outline a renewal principal of a "great place for the community;" however, the design guidelines only mandate that 1.6% of the gross floor area is required to be community space, and as the community space will be in the developer's private hands there is no guarantee that the community will ever be able to access these spaces.

The design guidelines should increase the amount of community space and mandate that they remain in public ownership to ensure they are protected from commercial interests.

# Heritage impacts and lack of coherent identity

The design guidelines state that this rezoning proposal will "respect the past, adaptively re-use heritage buildings in the precinct and will acknowledge Redfern's existing character" and "building positively to its surrounding urban environment." The proposal does not respect the past, and nor does it provide respect to the heritage buildings and character of the area. The area is a heritage conservation area and modern-skyscrapers which tower over and dwarf the entire area which has a negative impact on the surrounding environment and the people who live in neighbouring areas can in no way be construed as positively impacting the locale.

The Paint Shop are seen as buildings of significant heritage value, primarily as a result of the unique roof. The current proposal shows that a building of up to 63.6m can be placed anywhere above and over the entirety of the building. Doing this would ruin the heritage of the Paint Shop and not allow anyone to enjoy the unique heritage of the building. The development proposal should ensure that the heritage of the paint shop building is respected and any development of this building should be sympatric to the design aesthetic of the original Paint Shop building. All new buildings on the site should be capped at 9 storeys.

As an owner and resident of Wilson	1 Street, I ask that my concerns as noted above regarding the
rezoning and development of the N	orth Everleigh Paint Shop precinct are taking into consideration. I
can be contacted by phone on	should you require
further clarification.	

Yours Sincerely,

Jo Devery

Darlington NSW 2008

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 11:24 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 23:23

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Anna

#### Last name

Tregloan

I would like my submission to remain confidential

Νo

# Info

#### **Email**

# Suburb/Town & Postcode

DARLINGTON

### Please provide your view on the project

I object to it

#### **Submission**

I am writing this submission, regarding the North Eveleigh Paint Shop Proposal, as a resident of Wilson Street, Darlington and a concerned NSW resident.

I have grave concerns and believe that the rezoning and development proposal is short sighted and ill conceived.

It is common knowledge that last few years have seen an enormous shift in what the citizens of Sydney value and while there is certainly a housing affordability shortage, there is a reticence to pay top dollar for inner city high rise apartments and an exodus from office working. With more people continuing to opt to work from home (and especially in the tech industries) the number unused office spaces is growing; meanwhile there is an emphasis in the community on the importance of green space and well articulated communal areas.

This proposal addresses none of these shifts by not effectively addressing affordable housing (only 15%), not ensuring quality functional public open space nor green space (by rezoning, selling to developers and using the tag "State Significant" the government is giving up those controls).

Moreover the proposal is completely out of keeping with the surrounding neighbourhoods and would cause irreparable damage.

In particular I am concerned that:-

- The heritage nature of the site has not been considered. This pertains generally to the relationship of the development to an overtly heritage area and specifically to the proposal to simply retain the paint shop facade and build up and over. Even if that is but an early impression it is architecture at its most unintelligent. Likewise the lack of acknowledgement of the Aboriginal social history in the area is a major oversight (including but not solely demonstrated in the lack of any commitment to culturally appropriate housing).
- The scale of buildings which would be allowed if the rezoning was approved is so out of synch with the area one wonders if the planners have even seen the site. This proposal suggests buildings which are well over 12 times the average for the area and that those fronting Wilson Street are more than double the very tallest existing structure.
- That even within the Design Masterplan the buildings used as benchmarking are under 25% of the 28 stories proposed. Further more the statement that the development will transition from low rise at the Wilson Street end to high rise nearer Redfern Station is clearly incorrect. While the artists impressions provided might use tricks of perception it is very clear from the display model that the development dwarfs all surrounding structures and homes.
- Similarly the claim that this structure would not have a negative visual impact is patently untrue. The buildings would block views of heritage buildings for some residence and skyline views for many others (including those on the south side of the rail tracks). Additionally for some buildings (notably the 501 appartments) solar access would also be impeded.
- In this era of perilous climate change that this rezoning would undermine public green space requirements is erroneous. By negating green space but building large concrete and glass structures this proposal encourages the development of a heat sink which would not only add to the areas unpleasantness but encourage the use of air conditioners which would in turn cause more climate damage.
- In this era of perilous climate change that this rezoning would undermine public green space requirements is erroneous. By negating green space but building large concrete and glass structures this proposal encourages the development of a heat sink which would not only add to the areas unpleasantness but encourage the use of air conditioners which would in turn cause more climate damage.
- Further that the rezoning would allow a 67% increase in the bulk and scale of what can be built yet no consideration has been given to how that resulting increase in foot, car and bicycle traffic would be managed. All resources in the area (from doctors to schools to parking and traffic) are already under pressure and no consideration has been given to this additional burden. This is exemplified by the lack of adequate consideration given to access in the implication that all this extra traffic should somehow be absorbed by Shepard Street when a bridge across the train-line is a more practical solution.
- Additionally the request to re-zone the entire site as mixed-use, without guaranteeing that areas listed as "open space" be zoned as "recreational area", demonstrates that there is an inherent failure in the re-zoning request to meet the design guidelines of "great public space." If the entire site is "re-zoned" as mixed-use with the proposed density and floor space ratio there is no guarantee that "open-spaces" will be retained.

Beyond my concerns with content of this proposal I am also concerned by the way in the proposal itself is framed:-

I believe it may be public knowledge that Mirvac (property developer) is interested in the North precinct and the Consultation Outcomes report shows that developers have been involved in all stages of the planning process to date. I also understand that Mirvac has made a submission during the concept planning phase in March-April 2021 on this rezoning. The submission from Mirvac has not been made public, nor has it been made public what influence this submission had on the rezoning proposal. The consultation guidelines state that the community should "be at the centre of all planning and design;" however, not I, nor any of the community members I am in contact with, recall Transport for NSW actively seeking out feedback or input on the design and what would benefit the community. No genuine consultation with the community has occurred, and this proposal and the short window for submissions is evidence of this.

Additionally the proposal and its documentation seemed purposefully impenetrable and misleading. While most are educated in the 'spin' which goes into these documents for an entity which does claim to be working for and with community this the scale of the misleading imagery and statements seems very disingenuous.

Further to this, much of the supporting technical documents fails to adequately meet its brief, and as a result the information used to support a rezoning of this scale is inadequate. The community should be able to trust that these reports are appropriate and accurate and it is concerning that this appears not the case.

In summary, this proposal clearly demonstrates a lack of community consultation and that community and environmental needs have not been considered. What does seem clear to members of the community and beyond is that the sale of this land is a money grab by the NSW Government. That the government would give up the entitlement to oversee appropriate and considerate development of this site (or any other) is extremely concerning and incredibly disappointing.

There is an opportunity for the governments (state and city) to regenerate under utilised urban space and develop a sustainable and energised precincts. They could be demonstrating progressive contemporary design which is sensitive to heritage, community and the environment. Instead this rezoning proposal seems set to encourage retrograde urban planning and design which will degrade the right to enjoyment of current residents and permanently disrupt the tenor of the area.

2

# I agree to the above statement Yes

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 11:04 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** submission-north-eveleigh-resoning-proposal.pdf

Submitted on Wed, 24/08/2022 - 23:03

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

#### First name

Adrian

#### Last name

Hauser

I would like my submission to remain confidential

No

# Info

### **Email**

# Suburb/Town & Postcode

Darlington

# Please provide your view on the project

I object to it

# Submission file

submission-north-eveleigh-resoning-proposal.pdf

### **Submission**

Submission attached as PDF.

### I agree to the above statement

### Redfern North Eveleigh Paint Shop Precinct Rezoning Proposal Submission

DATE 23 08 2022 NAME Adrian Hauser

ADDRESS , Darlington.

### **PUBLIC SUBMISSION**

As a long term resident in Wilson Street Darlington I strongly object to the Redfern North Eveleigh Paint Shop Precinct Rezoning Proposal in its current form.

Page 2 of The Frequently Asked Questions document supplied by the NSW Government outline why the planning controls need to be changed for the Strategic Vision and what the key improvements and elements are. Not ONE of these points refer to the need for 28 storeys of residential housing and I believe that all of these points could be made without altering the current Building Heights Map at all.

# **SCALE**

- The proposed amendments to the current Planning Controls see an increase from current building height of a modest 10 Storeys to heights of up to 28 Storeys (there is a small patch in the current heights map marked X allowing for 16 Storeys but the majority of the map is capped at 10 storeys).
- The proposal is almost 70% larger in bulk and scale than what was originally proposed in 2008.
- The heights of the proposed skyscraper sized residential towers are not in line with the areas status as a conservation area.
- We would like to see residential building heights reduced to 10 Storeys.
- The increased height will set a very dangerous precedent for the rest of the area, in particular the Clothing Store Sub precinct.

# TRAFFIC AND PARKING

- The introduction of new access points off Shepherd St and Ivy Lane and Little Eveleigh Street are inappropriate and create a major safety hazard for pedestrians and cyclists on Wilson Street. All streets surrounding the Paint Shop sub-precinct are quiet residential streets that get greater foot and cyclist traffic than vehicle traffic.
- The traffic and noise studies that support this rezoning application are inaccurate, and in the instance of a traffic study non-existent. The design guidelines are therefore based off deliberately missing or misleading information.
- All construction traffic over the proposed 8 year build time must be kept on site and not use Wilson Street and equipment is only transported through the rail corridoor.
- It is concerning that the development will only mandate 5 accessible parking spaces be built across all of the parking (residential and non-residential) on the site and in no way does this level of accessible parking ensure that individuals who require accessible parking will have adequate access to the site.

 As per the Transport Strategy and Transport Impact Assessment only one car share space has been allocated in the on-street parking in this development. This is highly inadequate.

### RESIDENTIAL APARTMENTS AND AFFORDABLE HOUSING

- There is a lack of social and affordable housing in the proposal which is stated as 15%. COS would target a minimum 25%.
- The design guidelines refer to studies and recommendations that state that most apartments in the area are for single person households and that the expectation that lone person households are the group that is expected to have the greatest increase in demand for housing. However, this fails to recognise that families and multi-person households are unable to find suitable housing in the area and are therefore being forced to leave due to inadequate provision of housing suitable to their needs. The design guidelines and apartment mix (9.5.13) fail to address this need by setting a minimum requirement of 40% of 1 bedroom or studio apartments. Minimum limits on 3 and 4 bedroom apartments should be increased to provide adequate housing for families and multi-person homes. Further, the design guidelines allow apartments of two or more bedrooms to be "dual-key" apartments, which in effect, is another way of increasing the number of 1 bedroom/studio apartments. No "dual-key" apartments should be allowed in an area that is sorely lacking in appropriate housing for multi-person and family sized homes.
- The design guidelines and re-zoning change request do not meet community expectations regarding the lack of social housing, and the lack of definition of "diverse housing." Further, without guaranteed housing for Aboriginal people the design also does not meet community expectations.
- It needs to be noted that Residential accommodation should not be made for the purposes of Student accommodation.

### HERITAGE AND LOCAL IDENTITY

- The proposal does not respect the past, and nor does it provide respect to the
  heritage buildings and character of the area. The area is a heritage conservation
  area and modern-skyscrapers which tower over and dwarf the entire area which has
  a negative impact on the surrounding environment and the people who live in
  neighbouring areas can in no way be construed as positively impacting the locale.
- The Paint Shop are seen as buildings of significant heritage value, primarily as a result of the unique roof. The current proposal shows that a building of up to 63.6m high an be placed anywhere above and over the entirety of the building. Doing this would ruin the heritage of the Paint Shop and not allow anyone to enjoy the unique heritage of the building. The rezoning should not allow for a building to be placed above the Paint Shop.

### INNAPPROPRIATE MIX OF COMMERCIAL AND OFFICE SPACE

- The allowance of 72.2% gross floor area (GFA) for commercial spaces is inappropriate and not in line with community expectations. The retail spaces in this proposal provide 9000sqm of GFA; however, the retail mix using this space is not in line with community expectations. There is no guarantee that social enterprises, like the Bread and Butter Project, will be able to get access to retail space. These social enterprises support the wellbeing of the community and our most vulnerable residents, and often become a part of the fabric of the community. There should be guaranteed provisions for appropriate social enterprises within the retail mix.
- The retail mix also creates allowances for food and grocery stores which are very welcome in this area of Darlington; however, there is a concern that the grocery space would not be available to small green grocers, independent supermarkets and butchers by the supporting study proposing metro stores from Woolworths and Coles. This will instead worsen the monopoly that the major grocery retailers have on the food market in the area. Carriageworks has successfully run a curated social food market that supports small business and my recommendation is that this protection for small businesses continue throughout the food and grocery space in this rezoning proposal.
- The Economic Assessment also refers to the impact of Covid-19 on reducing demand for commercial office floor space. The report states that 42% of workers wish to work from home following Covid-19; however, they still expect that high levels of commercial office space will be required in the site that aims to become a tech hub and attract technology workers. This is in direct contraction with the change in employee value proposition of the majority of technology firms as a result of Covid-19 which have shifted to a "work-anywhere" strategy. These employers have also shifted their hiring practices accordingly and are moving to a fully remote or hub-based office model. I do not believe as much of this space should be dedicated to office space for knowledge workers, as it is likely that the space will not be used and it will become a deserted unattractive area in the long-term. The rezoning proposal needs to be radically re-thought in line with the changing nature of work.
- The Planning Report suggests that a governance framework be put in place to "curate the mix of firms and services" however, the design guidelines do not mandate this. As the plan is for this space to be privately owned by developers there are no guarantees that a strong framework be put in place to protect the design of the area, rather it is likely that commercial interests and future profitability for the developer will take over.

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 10:39 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 22:39

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Yana

#### Last name

Liang

### I would like my submission to remain confidential

No

# Info

#### Email

# Suburb/Town & Postcode

2043

### Please provide your view on the project

I support it

### Submission

There should be one or two accessible footbridges for pedestrians and cyclists connecting north and south Eveleigh which will greatly improve accessibility and movement of crowd when there are events in either precincts.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 10:36 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 22:35

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

### First name

Patrick

#### Last name

Li

I would like my submission to remain confidential

Νo

# Info

#### **Email**

# Suburb/Town & Postcode

Ultimo 2007

### Please provide your view on the project

I am just providing comments

#### **Submission**

Dear development agents

According to your provided document, I understand that the development of the 28 storey high apartment building next to the Carriageworks Market at Eveleigh may sound like a great idea to house an ever increasing population that migrate towards Sydney from overseas.

Given the respect of the proposal, there are things to consider if deciding to accomplish the development around Carriageworks.

1. Firstly, it needs to address the social housing fix for Aborigines living in the Redfern and Eveleigh suburbs. According to Clover Moore's feedback, the development does not factor into the critical housing strain experienced by Aboriginal and Torres Strait Islanders.

- 2. The style of the development needs to leave many old stylistic buildings untouched. Clover Moore has again voiced her concerns that the development may violate cultural appearances (caricatures) regarding preserving the historic styles of old buildings. This is true particularly if you have plans over the old paint shop.
- 3. Make sure that the interference with noise and traffic is kept to a minimum. Most signs at pubs advice customers to leave the precinct quietly to respect nearby residents. Noise pollution and traffic congestion may interfere with the flow of pedestrian and vehicle traffic which rely a road with two or more lanes to travel freely. According to Jamie Parker, development over green spaces may interfere with the trees' functions to keeping our suburbs and parks nice and cool in the summer.

While it may seem like a big exciting project, factoring these barriers can have a huge impact on how you would want to build. The

best option is to consider the consultation to the Eveleigh and Redfern communities (such as this submission) for more information before proceeding with your project. Fortunately enough, Eveleigh and Redfern areas contain large amounts of unused land for such developments to take place, as long as it abides (agrees) with the conditions noted above.

Kind regards from Patrick Li Ultimo 2007

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Tuesday, 16 August 2022 8:55 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Follow Up Flag: Follow up Flag Status: Flagged

Submitted on Tue, 16/08/2022 - 20:55

Submitted by: Anonymous

Submitted values are:

**Submission Type** 

I am making a personal submission

# **Name**

### First name

Michael

### Last name

Prince

I would like my submission to remain confidential

No

# Info

### **Email**

### Suburb/Town & Postcode

Ryde

# Please provide your view on the project

I support it

#### Submission

Looks fantastic. This will be a great revival for a run-down area. Excellent work Transport for NSW!

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 4 August 2022 10:32 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 04/08/2022 - 22:31

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Michael

#### Last name

Prince

#### I would like my submission to remain confidential

No

# Info

#### **Email**

### Suburb/Town & Postcode

2112

### Please provide your view on the project

I support it

### Submission

Fantastic work to the team at TfNSW! I love that the area will be revitalised and given a new lease on life rather than be a haven for drug dealers and delinquents. The building over the paint shop is a particularly good idea; I love the fusing together of old and new to bring new soul to the precinct. Good job! I can't wait to see the finished project!

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 10:10 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 22:09

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Michael

#### Last name

Prince

### I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

Ryde

### Please provide your view on the project

I support it

#### **Submission**

This is a fantastic revitalisation to the area. We look at the area and wonder why it has sat how it has for so long. Heritage NSW should be ashamed for letting it deteriorate, and given their stance on heritage it seems ironic. Top effort TfNSW! I hope DPE doesn't give you too much shit.

### I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 10:10 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 22:09

Submitted by: Anonymous

Submitted values are:

**Submission Type** 

I am making a personal submission

# **Name**

First name

Claire

Last name

Dunn

I would like my submission to remain confidential

Nο

# Info

### **Email**

Suburb/Town & Postcode

2043

Please provide your view on the project

I object to it

**Submission** 

I object to it

I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 9:57 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 21:57

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# **Name**

### First name

Christopher

### Last name

Medlicott

### I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

2043

### Please provide your view on the project

I object to it

#### **Submission**

The size and scale of this project is not in keeping with the immediate environs. Whilst I am supportive of the revitalisation of the area and the proposed mixed use, the proposed scale and in particular proposed heights will have a material impact on those living nearby.

# I agree to the above statement

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 9:49 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** north-eveleigh-development-letter\_shk.pdf

Submitted on Wed, 24/08/2022 - 21:43

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

#### First name

Eleanor

#### Last name

Kable

### I would like my submission to remain confidential

No

# Info

### **Email**

# Suburb/Town & Postcode

Darlington

# Please provide your view on the project

I object to it

# Submission file

north-eveleigh-development-letter shk.pdf

### **Submission**

Please find attached my objection to this proposal.

# I agree to the above statement

Darlington, NSW, 2008

Transport for NSW

**NSW Government** 

Re: Paint Shop Sub-Precinct Rezoning Proposal

To Whom it May Concern,

We are long-term residents of Darlington. We have owned and lived in a terrace on Abercrombie street for more than 30 years. In that time the area has changed greatly, with more people living in the area permanently and forming a close community.

We refer to the development plans for the North Eveleigh precinct and object to this proposal on several grounds. First, and most importantly, the proposal has not had sufficient community consultation. Community feedback is even more important than one citizen! We attended an important community consultation on the 13<sup>th</sup> of August, where, disappointingly, there was no representative from Transport NSW, even though significant notice was given. The room was overflowing with the local community and local counsellors seeking to discuss this proposal.

Turning to specific issues that I have with the development proposal as it stands.

- The development proposal introduces significantly more housing into the area, but with
  little consideration of the demographics of the people who might live in this
  accommodation. There is no definition of affordable/diverse housing. There needs to be a
  mix from low-income rental, to affordable housing for nurses, teachers, police. The
  percentage mentioned, "up to 15%", is far too low. We need to get to at least 30%.
- More families are now living and staying in the inner city. However, there is no sign that children are being considered in this project. It has been shown that exercise in all forms is necessary for our physical and mental health and this is best started at a young age. This project needs to incorporate active recreation spaces places where children can kick a ball, throw a frisbee, organize impromptu games. Indoor spaces for court sports are also crucial. The nearest courts are Sydney Uni and Alexandria, both of which are over-subscribed. Just in the years I have lived in Darlington, the pocket park on the corner of Abercrombie and Shepherd Sts has gone from being my daughter's "private park" to being continually used by neighbors for open space to play games, BBQ, community garden, and just sit in the sun. Much more active public recreation space needs to be made available.
- Heavy vehicle (truck) access to the corporate park (retail + commercial) is problematic. The
  plans are not clear, but it seems that Shepherd St will be widened and parking removed for
  heavy vehicle access? Shepherd St is a quiet suburban street with ~10,000 school and
  university students crossing it twice a day. The street is on the boundary of a major
  University. The suburb of Darlington is full of kids running around the streets and the last

thing that is needed is a heavy vehicle route through our community. We are not opposed to commercial development, but proper and sympathetic planning is need for access. Given the industrial nature of South Eveleigh, access from South Eveleigh, over the railway lines, would be a more robust and safe option all around. We provide a sketch to show the intent. As a secondary benefit, this would link North and South Eveleigh, thereby connecting the precincts and linking facilities, people and companies.

 Heritage protection needs to be foremost in the design concept. The heritage planning in South Eveleigh and Carriageworks has been exemplary. The same level of heritage protection does not seem to be in place in the current North Eveleigh design. The whole area will be dominated by two 28-story towers, in an area of low-rise heritage buildings.

Please use this once-in-a lifetime opportunity to work with the community and make North Eveleigh a wonderful project, and an asset to the whole community. The time for this consultation is far too short. We implore you to extend this time, seek community input and build for the future of our community.

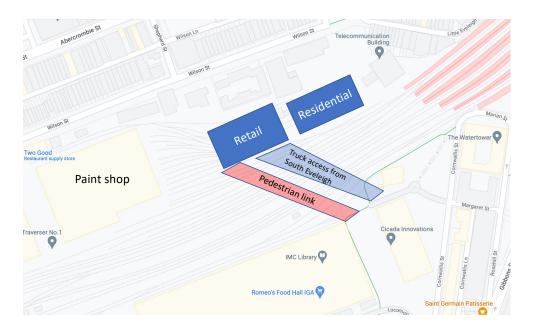
For the record, we are not members of, nor have donated to, any political parties.

Sincerely,

Scott and Eleanor Kable

24-August-2022

# Alternative heavy vehicle & pedestrian access



From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 9:42 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Wed, 24/08/2022 - 21:42

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

# Name

### First name

Gretchen

#### Last name

Miller

#### I would like my submission to remain confidential

No

# Info

#### **Email**

# Suburb/Town & Postcode

Erskineville, 2043

### Please provide your view on the project

I object to it

#### **Submission**

I am deeply, deeply distressed at the proposal to absolutely bastardise the Carriageworks end of Wilson St.

What you are planning is a monstrosity, and nothing remotely like it should go ahead in the area.

The reasons are: it does not fit into the amenity of the area

It does not fit aesthetically into the area

It will alter a charming part of Sydney irreperably.

It does not fit into the Darlington Conservation area in any way shape or form.

Just bloody no.

I'm beyond furious about your plans. This WILL be an election issue.

## I agree to the above statement

#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Wednesday, 24 August 2022 12:13 PM **To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** sub-nth-eveleigh-24-august-2022.pdf

Submitted on Wed, 24/08/2022 - 12:11

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

#### First name

Michael

#### Last name

Mobbs

I would like my submission to remain confidential

No

## Info

#### **Email**

#### Suburb/Town & Postcode

Chippendale

#### Please provide your view on the project

I object to it

#### **Submission file**

sub-nth-eveleigh-24-august-2022.pdf

#### **Submission**

Submission, North Eveleigh Paint Shop Sub-Precinct

Ву

Michael Mobbs

24 August 2022

Submitted to the submissions portal: https://www.planningportal.nsw.gov.au/paintshop

#### Summary

The climate pollution impacts of the project are not considered in the planning documents. In the absence of data in those documents estimates are made here of the climate pollution impacts. Solutions are offered.

The estimates show the project pollution from construction and use may be characterised as those from an 'urban coal mine'.

As the climate impacts have not been referred to or quantified the project may breach the precautionary principle in the Environmental Planning and Assessment Act, 1978 and render the project subject to legal challenge. The Act does not restrict assessments to land use aspects such as zoning, building height, floor space ratios, and heritage. The Act obliges environmental assessments and the application of the precautionary principle for all aspects of all projects whether for a single site or for precincts.

The principles and the trigger by which project proponents are to apply the precautionary principle are set out in Telstra v Hornsby.

In the Rocky Hill decision of the Land and Environment Court, Gloucester Resources Limited v Minister for Planning [2019] NSWLEC 7, the Court indicated that the following factors must be considered when applying the precautionary principle and assessing the impact of climate pollution:

- Greenhouse gas (GHG) emissions from the development;
- the likely contribution of GHG emissions to climate change;
- the consequences of this contribution to climate change; and
- other impacts of the development.

The Court also held that it was irrelevant that the Project contributed a small fraction of the global total of GHG emissions.

According to NSW government data estimates, the climate pollution in 2019 from the local government area of Sydney City Council, within which the project and precinct is located, is 983,649 tonnes a year. The estimates are low as they do not include data of the significant amounts of climate and other (water, soil, air) pollution from waste and waste water; https://datasets.seed.nsw.gov.au/dataset/nsw-regional-and-local-greenhouse-gas-emissions-2016-2019.

Preliminary estimates here indicate the climate pollution contributed directly and indirectly from construction and annual operations of the precinct will be roughly 1 to 2% of the climate pollution in the Sydney City Council area. In the Rocky Hill Case (referred to above) the court held it was irrelevant that the project contributed a small fraction of the global total of GHG emissions and that observation is relevant to the proposed project at North Eveleigh.

The omission of climate pollution planning for the precinct is indefensible and baffling. The nearby railway precinct at the southern end of the Central Business District - at Central station (the Western Gateway Precinct) - will have perhaps Australia's leading low climate polluting building by Atlassian and it will be 180 metres high with solar power generated on site and powered by 100% renewable energy.

The professional duties of the designers, consultants who have authored the precinct documents – architects, engineers, etc – are stated by their respective professional bodies differently but to the same effect; they require their members to sell their services so as to implement sustainable outcomes. I'll pursue this issue separately but indicate here that the documents could only be published in their current form if their authors and, depending on their involvement, if any, their professional bodies, closed their minds to their duties to sustain Earth's environment and to adhere to the obligations of the planning and environmental legislation.

I learnt on Saturday 20 August of the call for public comment on the North Eveleigh project from a community information stall at Carriageworks. I am a sole trader with limited resources and time to comment in the five days before comments close on Thursday 25 August. Thus, the estimates and data here are preliminary and broadly based. Some of the estimates are based on evidence about climate pollution in litigation I've been directly or indirectly involved in and which is relevant to this proposal.

If an extension of time is granted to make comments – which I now request to be four weeks - I will provide more detailed research and data about the precinct and more solutions.

Estimates and observations on the project with solutions

- 1. Key infrastructure data is missing which is essential for precinct planning: data is missing about:
- a. Climate pollution generally and in particular pollution from all infrastructure, urban heat island effects, and from water, sewage, recycling of water and waste including waste water, transport, car parking, bicycle and walking, food production and for achieving food security.
- b. One page of the voluminous documents addresses the environmental impacts of the project, titled "3.4 Environmental context", copied here:

The page speaks for itself; some trees and the sun's reach are noted. Full stop.

The Ministry of Truth in George Orwells' book, 1984, would give it top marks for simplification. Tom Wolfe would have included it in his book, Bonfire of the vanities, when showing how "greed is good'. If they would have written a book so, too, would the soldiers in the home town of such vanities, Sydney, during their Rum Rebellion - the tradition of their addiction to power and building whatever they wanted wherever they wished is given new momentum by this project and that beautifully simple page.

On 5 April 2022, United Nations scientists told us we have 30 months left to stop polluting Earth if we're to prevent or reduce the collapsing climate. From the date of this submission, August, we have 27 months left. Earth won't wait for anyone.

- 2. Infrastructure estimates:
- a. Rain water, stormwater, on site water harvesting:

The Paint Shop Precinct area of 10 ha will receive ~ 1250 mm of rain a square metre, or, at 10,000 m2 to a hectare, a total rainfall of some 12.125 billion litres of water a year, or 12.5 million litres a hectare.

Presently much of the rain at the precinct is absorbed there by permeable surfaces.

New paved, roofed and hard surfaces will speed up and dispose of most of that rainwater to one of Sydney's more polluted harbour waters, Blackwattle Bay and to Botany Bay.

The amount of rainwater, and the impact of the plans on the increase or decrease of runoff, and the potential to use rain water on site is not mentioned or quantified, nor is the associated potential to reduce climate pollution.

#### b. Water and sewerage energy and pollution

If plans are realised for "up to 450 new homes, around 8,000 jobs during construction and up to 16,000 jobs once activated" then the following water use and sewage discharges are possible:

- c. assume an average of 100 litres of sewage a day per person and 190 litres of water used per person (the number of permanent residents and workers is assumed to be 20,000 people);
- d. the total daily water use is roughly estimated to be 3.8 million litres, and the total daily sewage discharge is roughly estimated to be 2 million litres which, if managed by Sydney Water, will discharge into the ocean;
- e. the energy to deliver the water and sewage services and the climate pollution to pump the water and sewage has not been mentioned and no data about this is provided; I estimate that business as usual (unsustainable town water system) will cause about +/- 300 to 500 kg per annum of climate pollution per person or about +/- 50,000 to 100,000 tonnes a year total.

#### f. Solar energy:

Sydney Water states that 2,200 homes use about 13 gigawatt hours of electricity a year and it saves that much with efficiencies and harvesting energy from its sewerage plants.

Neither the amount of anticipated energy use nor the potential to harvest solar energy on site for any purpose is mentioned in the documents.

With high electricity use from offices and homes the precinct may use several gigawatts.

Sunlight is available on the 10 ha precinct to provide several gigawatt hours of clean energy and lower bills to residents and workers there.

#### g. Car parking, traffic and air pollution:

Car parking at Central Park, Chippendale, a precinct development in the adjoining suburb of Chippendale, and of a similar scale, is provided for 3,000 cars in a multi-level excavation. It required 18 months of excavation and hundreds of heavy truck movements, plus new traffic lights on Broadway to create new right hand and left hand turns there.

The proponent is familiar with and involved in the planning and use of that site.

I was involved in litigation against the then proponent of the Central Park project about its climate and environmental impacts. The litigation was lost at law but not in practice. The developer could not get funding during the world-wide stressed financial circumstances at the time until the litigation was terminated. Agreement reached between the parties to enable project funding specified the sustainable goals for the project many of which were implemented and proudly promoted by the developer. The environmental character of the project was substantially changed because of the litigation and more sustainable uses and designs made for water, recycling water, materials and energy.

To propose some dozen years later in this precinct plan to repeat some of those car parking and traffic impacts is baffling. It's provocative to many of us living, working or visiting Chippendale, Darlington, Redfern and the CBD. Our litigation over Central Park shows we respect and defend our environment.

#### 3. Productive, edible food production, urban farming

No reference to climate change impacts from food production or food security appear in the public consultation documents. Nor is there reference to Sydney City Council's leadership with its policy enabling self-approval for urban farming in road verges which has increased property values, grown social 'glue', cooled streets, increased personal health, and reduced food waste and the climate pollution it previously caused.

Solutions to reduce, avoid climate pollution:

4. How to reduce urban heat island, avoid higher air con energy use, prevent stormwater pollution:

Keep rainwater where it falls; see solution below compared to precinct proposal:

Solution above.

#### Typical failed design proposal below

The design below ignores the water needs of trees and verges and increases the urban heat island temperatures of Sydney due to poor canopy cover and poor tree growth - extract below is from the proponent's Design Guideline, Figure 11 -

#### The solution above:

- passively irrigates road verges, trees;
- reduces the urban heat island effect;
- increases tree growth and canopy area;
- lowers air con bills and energy use;
- reduces public domain maintenance costs;
- reduces stormwater pollution.

#### More examples at:

- https://www.sustainablehouse.com.au/michaels-blog/2022/8/3/how-to-make-city-trees-grow-faste
- · Manual for passively irrigating verges here

More solutions are available on other aspects of design guidelines and the precinct generally and can be provided if the time to make submissions is extended as requested above.

- End of submission -

#### I agree to the above statement

Yes

#### SID179



Submission, North Eveleigh Paint Shop Sub-Precinct By Michael Mobbs

24 August 2022

Submitted to the submissions portal: https://www.planningportal.nsw.gov.au/paintshop

### Summary

The climate pollution impacts of the project are not considered in the planning documents. In the absence of data in those documents estimates are made here of the climate pollution impacts. Solutions are offered.

The estimates show the project pollution from construction and use may be characterised as those from an 'urban coal mine'.

As the climate impacts have not been referred to or quantified the project may breach the precautionary principle in the *Environmental Planning and Assessment Act*, 1978 and render the project subject to legal challenge. The Act does not restrict assessments to land use aspects such as zoning, building height, floor space ratios, and heritage. The Act obliges environmental assessments and the application of the precautionary principle for all aspects of all projects whether for a single site or for precincts.

The principles and the trigger by which project proponents are to apply the precautionary principle are set out in Telstra v Hornsby.

In the Rocky Hill decision of the Land and Environment Court, Gloucester Resources Limited v Minister for Planning [2019] NSWLEC 7, the Court indicated that the following factors must be considered when applying the precautionary principle and assessing the impact of climate pollution:

- Greenhouse gas (GHG) emissions from the development;
- the likely contribution of GHG emissions to climate change;
- the consequences of this contribution to climate change; and
- other impacts of the development.

The Court also held that it was irrelevant that the Project contributed a small fraction of the global total of GHG emissions.

According to NSW government data estimates, the climate pollution in 2019 from the local government area of Sydney City Council, within which the project and precinct is located, is 983,649 tonnes a year. The estimates are low as they do not include data of the significant amounts of climate and other (water, soil, air) pollution from waste and waste water; https://datasets.seed.nsw.gov.au/dataset/nsw-regional-and-local-greenhouse-gas-emissions-2016-2019.

# michael mobbs



Preliminary estimates here indicate the climate pollution contributed directly and indirectly from construction and annual operations of the precinct will be roughly 1 to 2% of the climate pollution in the Sydney City Council area. In the *Rocky Hill Case* (referred to above) the court held it was irrelevant that the project contributed a small fraction of the global total of GHG emissions and that observation is relevant to the proposed project at North Eveleigh.

The omission of climate pollution planning for the precinct is indefensible and baffling. The nearby railway precinct at the southern end of the Central Business District - at Central station (the Western Gateway Precinct) - will have perhaps Australia's leading low climate polluting building by <a href="Atlassian">Atlassian</a> and it will be 180 metres high with solar power generated on site and powered by <a href="100%">100%</a> renewable energy.

The professional duties of the designers, consultants who have authored the precinct documents – architects, engineers, etc – are stated by their respective professional bodies differently but to the same effect; they require their members to sell their services so as to implement sustainable outcomes. I'll pursue this issue separately but indicate here that the documents could only be published in their current form if their authors and, depending on their involvement, if any, their professional bodies, closed their minds to their duties to sustain Earth's environment and to adhere to the obligations of the planning and environmental legislation.

I learnt on Saturday 20 August of the call for public comment on the North Eveleigh project from a community information stall at Carriageworks. I am a sole trader with limited resources and time to comment in the five days before comments close on Thursday 25 August. Thus, the estimates and data here are preliminary and broadly based. Some of the estimates are based on evidence about climate pollution in litigation I've been directly or indirectly involved in and which is relevant to this proposal.

If an extension of time is granted to make comments – which I now request to be four weeks - I will provide more detailed research and data about the precinct and more solutions.





### Estimates and observations on the project with solutions

- 1. Key infrastructure data is missing which is essential for precinct planning: data is missing about:
  - a. Climate pollution generally and in particular pollution from all infrastructure, urban heat island effects, and from water, sewage, recycling of water and waste including waste water, transport, car parking, bicycle and walking, food production and for achieving food security.
  - b. One page of the voluminous documents addresses the environmental impacts of the project, titled "3.4 Environmental context", copied here:



The page speaks for itself; some trees and the sun's reach are noted. Full stop.

The Ministry of Truth in George Orwells' book, 1984, would give it top marks for simplification. Tom Wolfe would have included it in his book, Bonfire of the vanities, when showing how "greed is good'. If they would have written a book so, too, would the soldiers in the home town of such vanities, Sydney, during their Rum Rebellion - the tradition of their addiction to power and building whatever they wanted wherever they wished is given new momentum by this project and that beautifully simple page.

On 5 April 2022, <u>United Nations</u> scientists told us we have 30 months left to stop polluting Earth if we're to prevent or reduce the collapsing climate. From the date of this submission, August, we have 27 months left. Earth won't wait for anyone.





#### 2. Infrastructure estimates:

#### a. Rain water, stormwater, on site water harvesting:

The Paint Shop Precinct area of 10 ha will receive ~ 1250 mm of rain a square metre, or, at 10,000 m2 to a hectare, a total rainfall of some 12.125 billion litres of water a year, or 12.5 million litres a hectare.

Presently much of the rain at the precinct is absorbed there by permeable surfaces.

New paved, roofed and hard surfaces will speed up and dispose of most of that rainwater to one of Sydney's more polluted harbour waters, Blackwattle Bay and to Botany Bay.

The amount of rainwater, and the impact of the plans on the increase or decrease of runoff, and the potential to use rain water on site is not mentioned or quantified, nor is the associated potential to reduce climate pollution.

#### b. Water and sewerage energy and pollution

If plans are realised for "up to 450 new homes, around 8,000 jobs during construction and up to 16,000 jobs once activated" then the following water use and sewage discharges are possible:

- c. assume an average of 100 litres of sewage a day per person and 190 litres of water used per person (the number of permanent residents and workers is assumed to be 20,000 people);
- d. the total daily water use is roughly estimated to be 3.8 million litres, and the total daily sewage discharge is roughly estimated to be 2 million litres which, if managed by Sydney Water, will discharge into the ocean;
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#### f. Solar energy:

Sydney Water <u>states</u> that 2,200 homes use about 13 gigawatt hours of electricity a year and it saves that much with efficiencies and harvesting energy from its sewerage plants.

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## michael mobbs



With high electricity use from offices and homes the precinct may use several gigawatts.

Sunlight is available on the 10 ha precinct to provide several gigawatt hours of clean energy and lower bills to residents and workers there.

#### g. Car parking, traffic and air pollution:

Car parking at Central Park, Chippendale, a precinct development in the adjoining suburb of Chippendale, and of a similar scale, is provided for 3,000 cars in a multi-level excavation. It required 18 months of excavation and hundreds of heavy truck movements, plus new traffic lights on Broadway to create new right hand and left hand turns there.

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To propose some dozen years later in this precinct plan to repeat some of those car parking and traffic impacts is baffling. It's provocative to many of us living, working or visiting Chippendale, Darlington, Redfern and the CBD. Our litigation over Central Park shows we respect and defend our environment.

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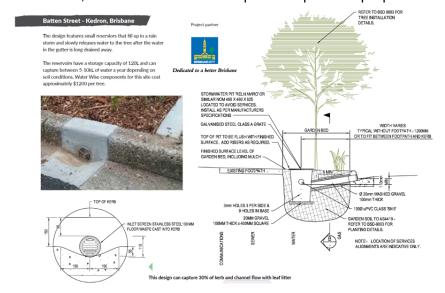




## Solutions to reduce, avoid climate pollution:

4. How to reduce urban heat island, avoid higher air con energy use, prevent stormwater pollution:

Keep rainwater where it falls; see solution below compared to precinct proposal:



· Diverting rain from the kerb to the tree

Solution above.

#### Typical failed design proposal below

The design below ignores the water needs of trees and verges and increases the urban heat island temperatures of Sydney due to poor canopy cover and poor tree growth - extract below is from the proponent's *Design Guideline, Figure 11* -



Figure 11: Section B - North-South Street from Shepherd Street





#### The solution above:

- passively irrigates road verges, trees;
- reduces the urban heat island effect;
- increases tree growth and canopy area;
- lowers air con bills and energy use;
- reduces public domain maintenance costs;
- reduces stormwater pollution.

#### More examples at:

- <a href="https://www.sustainablehouse.com.au/michaels-blog/2022/8/3/how-to-make-city-trees-grow-faste">https://www.sustainablehouse.com.au/michaels-blog/2022/8/3/how-to-make-city-trees-grow-faste</a>
- Manual for passively irrigating verges here

More solutions are available on other aspects of design guidelines and the precinct generally and can be provided if the time to make submissions is extended as requested above.

- End of submission -

#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 2:49 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

Submitted on Thu, 25/08/2022 - 14:48

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

### Name

#### First name

Michael

#### Last name

Mobbs

I would like my submission to remain confidential

Νo

## Info

#### **Email**

#### Suburb/Town & Postcode

Chippendale

#### Please provide your view on the project

I object to it

#### **Submission**

Yesterday I submitted a detailed submission and make this second submission today after discovering a document on this portal that I overlooked.

Just today, 25 August 2022, closing day for submissions, I discovered there is an "Environmental Study" by Arup dated June 2022. Still reading it. So far there is no mention of the United Nations report of 5 April 2022 - referred to in this blog - saying we and Earth only have 'til 2025 to end new climate pollution. On a quick skim these points seem to stand out:

The report is both irrelevant and misleading for two reasons:

- 1 It both fails to mention and to apply an analysis of the climate data in it to the UN data and predictions published on 5 April 2022.
- 2 It fails to disclose key matters which affect its credibility:
- Arup works for Mirvac who is expected to build, own and profit from the project; and
- Arup do not declare this financial interest in their report.

The report and the hidden agendas here remind me of the obsession with secrecy and deal-making of our former Prime Minister.

The more I read in the short time I've had available it seems this project is the gift that keeps on giving - more blogs to come on this on my website so that a little sunshine might be shone on this greed is good project.

Michael Mobbs 25 August 2022

I agree to the above statement Yes

#### **Thomas Cocks**

From: Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

Sent: Thursday, 25 August 2022 8:45 PM

**To:** DPIE PDPS Redfern North Eveleigh Mailbox

**Subject:** Webform submission from: Paint Shop sub-precinct rezoning proposal

**Attachments:** paint-shop-graphic-objection.pdf

Submitted on Thu, 25/08/2022 - 20:43

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

#### First name

Fiona

#### Last name

Young

I would like my submission to remain confidential

No

## Info

**Email** 

#### Suburb/Town & Postcode

Darlington

#### Please provide your view on the project

I object to it

#### **Submission file**

paint-shop-graphic-objection.pdf

#### **Submission**

I am writing this submission as a resident of Wilson Street Darlington NSW regarding the North Eveleigh Paint Shop Proposal. I object to both the rezoning proposal for the Redfern/North Everleigh Paint Shop sub-precinct as well as the process being conducted to change the Local Environment Plan.

#### **PROCESS**

We were first made aware of the proposal via a Transport for NSW flyer in our mailbox a little over three weeks ago. The flyer shows the reference scheme however there is little detail about proposed building heights or entrances in and out of the site requiring one to access the virtual engagement room to find out about these critical items. Once in the virtual room we are bombarded with an excess of information, with little guidance about which items are of most relevance to understand the impact of the proposal on immediate neighbours and/or the wider community. In addition, there is a plethora of documents and reports on the planning portal site. As there have been no face-to-face sessions with community as part of this process to adequately explain the proposal, we are left to navigate the virtual room and portal links on our own. The short exhibition period is insufficient to navigate the information provided and warrants an extension of time as well as a face-to-face consultation forum to allow an informed and considered response.

In addition, whilst we received the flyer in our mailbox, we are aware that residents in nearby Calder Road off Shepherd St did not. Given that the primary entry point into the site is via Shepherd St, which will incur a significant increase in traffic both during and after construction, this proposal will also impact on residents who live on Shepherd street and its arterial routes. The process has insufficiently considered who and how people will be impacted by the proposal and should be revisited to ensure that those who will be impacted, are adequately informed in a transparent manner to allow them to respond.

#### MISLEADING IMAGERY

Some of the site renders on the virtual engagement room begin to give an indication of the magnitude of the towers being proposed, however it is apparent that many of them are framed to make viewers think that the proposal is in keeping with other nearby developments. This however would be misleading however as it assumes that the other tall buildings are good examples (which they are not) or the context is the same (which it is not). Page 1 of the attached figure explains this.

Other images are of artists impressions of views within the site itself. However critically, what is remiss are views at human scale of the relationship of the proposed developments to the neighboring Wilson Street terrace houses. A view showing the five-storey 'residential commercial' building at the Codrington Road/Wilson Street junction focusses on the new building itself, rather than how this building fits within the streetscape with the two-storey terraces across the road (page 3 attached). This image needs to be reframed to show the juxtaposition of the scale of the new buildings with the row of heritage terraces houses adjacent. In addition, the image of the pavilion misrepresents the scale of development to the terrace houses beyond (page 4 of attached).

The model of the proposal at City of Sydney Council at Town Hall is a stark and unfiltered representation showing how out of scale and inappropriate this development is. However, I only became aware of this model on the evening of 24.08.22 from a REDWatch Facebook post. Why are images of this model not on the virtual engagement platform? Locating this model at CoS Council at Town Hall ensures that it will be unlikely to be seen by much of the public, and in particular by those who will be directly affected by the development. As part of an extended exhibition period, it would be reasonable to expect that an important visual device such as this be located local to the Redfern/Everleigh area to allow the community to easily access it to fully understand the extent and scale of what is being proposed.

#### BUILDING HEIGHT AND SCALE

Photos of the model reveal the extreme nature of how out of scale and lacking in context the proposed developments are. Darlington is a predominantly low-rise inner urban neighbourhood with a strong history and community focus. It is human scaled with a rich diversity of residents from young to old, many of whom are long-term residents who foster this sense of community. In turn, the family friendly nature of this area has enhanced a sense of connection and safety. The proposed developments maximise the commercial aspect of the site by enabling offices for 6000 people and 400 apartments, with little regard for the existing rich cultural and community context. The proposed increase in numbers for the site resulting in the sheer scale of the proposed buildings are not in keeping with the surrounding heritage context and do not consider the adverse impact of local residents. Eighteen to 28 storey residential and commercial buildings will destroy the vistas and sight lines of local residents and beyond. In addition, there is little logic in locating an over-scaled 28 storey commercial building on the edge of the proposed public square (refer page 2 of attached).

The five to eight storey buildings on Wilson street also dwarf the streetscape and I have grave concerns about two key aspects: 1/ the loss of views from terrace houses and 2/ the impact of noise and disruption from commercial uses in what is currently a peaceful and neighbourhood.

#### ACCESS AND TRAFFIC

The significant increase in numbers of people entering the site will greatly affect local road systems. The main entrance to the site is via Shepherd street, however, this is a narrow two-way street not equipped to accommodate a huge influx in traffic flow. The Wilson Street cycle paths have been a great asset enhancing cycling as a mode of transport for our family (with young child). In addition, Shepherd Street is a regular thoroughfare for us to cycle to other parts of the city. However, with much greater numbers of traffic coming up and down Shepherd Street, we are concerned that: 1/ There will be much greater congestion along this street and 2/ With footpaths ill-equipped for cycling, our family and other people will be unable to safely cycle via Shephard St which is a main connector to Broadway, UTS and other parts of the city. I have been unable to find any traffic studies which show the impact of this increase of traffic volume on vehicular, cycling, and pedestrian traffic and would like further information on investigations undertaken in this regard.

In relation to my comment above about misleading graphics to represent this scheme, I note that the TfNSW flyer does not even mark the proposed entrance to the site and downplays the roadway into the site as a 'green' space along with the other roads into the site.

Through previous information we have received relating to the South Everleigh site and Redfern station, we were informed that there would be a pedestrian footbridge linking North and South Everleigh and a new entrance to the station. There is no reference to this at all in this proposal. As a critical piece of infrastructure, I request further information on this.

#### DISRUPTION

In addition to my traffic concerns raised above, I have serious concerns about the adverse impacts on residents during the perceived lengthy construction period. At present, many residents rely on street parking, the lack of which is already an issue when there are events at the Carriageworks, when people from the University of Sydney illegally park there during the day, and when tradespeople working on local houses are working, taking up this parking for days at a time. Illegal parking is rarely or well policed. During construction, there will no doubt be large numbers of contractors arriving to site daily, further encroaching on what little parking there is available on Wilson Street.

In addition, large numbers of building vehicles will be entering the site from Shepherd and Wilson Street causing noise and dust disruptions to what is currently a peaceful and serene neighbourhood. The TfNSW flyer notes that this is an innovative proposal,

however innovation needs to be considered as part of the process beyond the final outcomes of 'outdoor free wifi' and a technology hub. We seek further information into how innovative thinking during the construction phase can minimise adverse impacts on local residents. Given the points set out above about the inadequacy of Shepherd Street to service this development, perhaps some innovative thinking can be put forward as to other ways to access the site during and after construction? Does the connection to South Everleigh open this possibility?

#### **HERITAGE**

Wilson St is part of a wonderfully cohesive family friendly neighborhood, with the heritage aspect of the terrace houses and the historic Carriageworks site a critical part of the essence of Darlington and why it feels so good living here. Beyond the inappropriateness of the overly developed commercial and residential towers and other buildings which completely negate the neighbouring context, the potential Paint Shop extension is not an appropriate addition to the heritage saw-tooth roofed Paint Shop. In addition, it is shocking that the historic Chief Mechanical Engineer's and Science Lab buildings are deemed for commercial uses rather than cultural or community uses for greater good. Finally, the Skippy Girl fence is a well-loved icon of this street. The appropriation of Skippy Girl imagery on the side of a building is a superficial and ill-considered reflection of this cultural artefact and like the rest of the proposition should involve and canvas community and broader consideration – and in the case of Skippy Girl engagement with the artist herself.

#### INTEGRATIVE THINKING

Although the marketing of the proposal mentions respect for heritage, restoring Country, and sustainability and the environment, the proposition as it stands, and the process in which it was conceived does not demonstrate these aspects in any significant or meaningful way. A development of this scale and complexity requires integrative thinking to achieve the right outcomes for a more sustainable future for people and the planet.

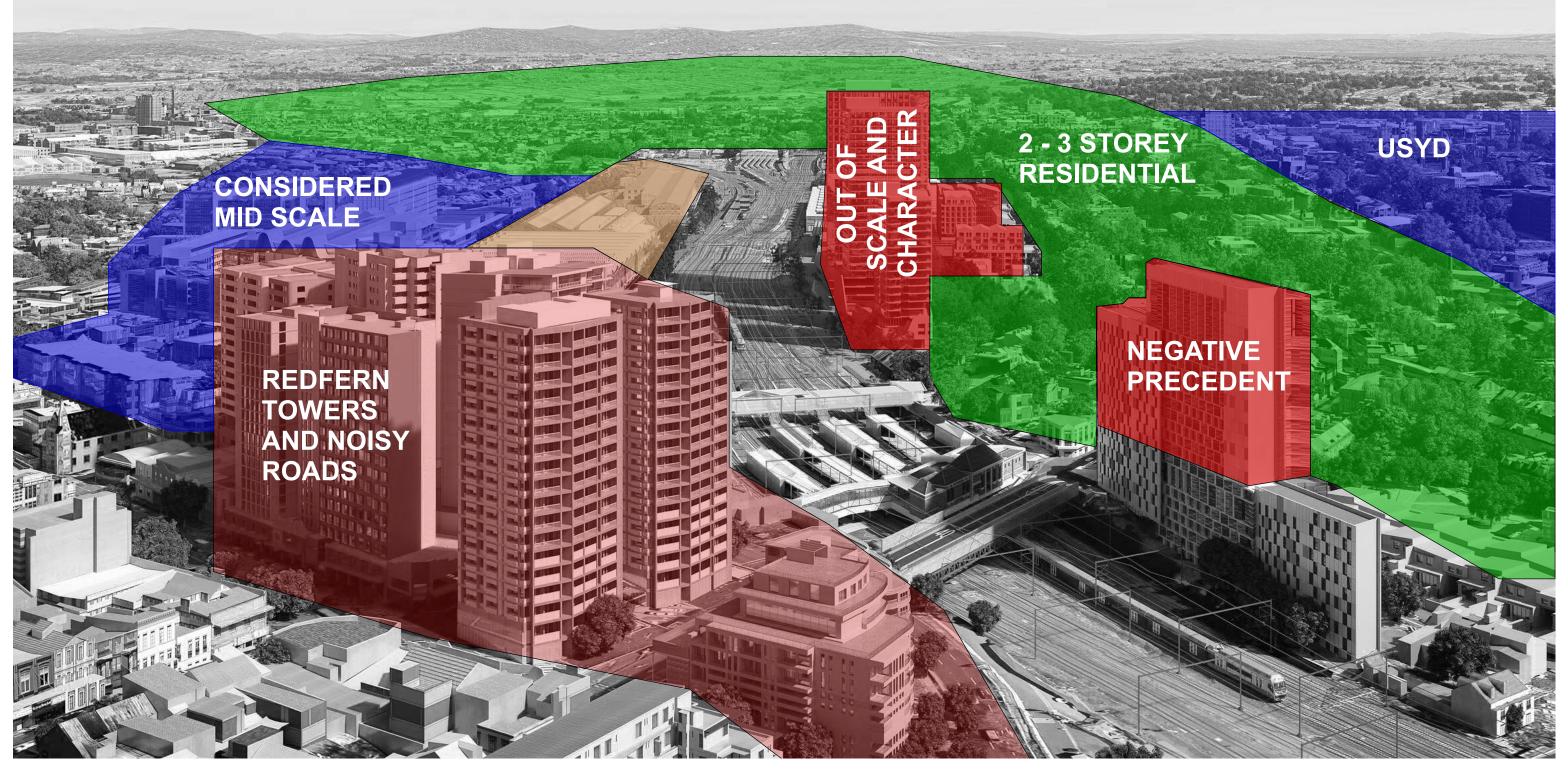
Integrative design processes for better design outcomes are multi-dimensional, integrating thinking beyond boundaries, across scales and between those who develop and design projects with those who will use them into the future. The proposition and process to date sadly ignores all of these elements which has clearly lead to this proposition which prioritises profit over people and the planet.

Opportunities to develop precious sites with rich heritage (like the Redfern North Everleigh precinct) into successful places and spaces owned and loved by the community, are becoming increasingly rare. This is a chance for the NSW Government to lead in demonstrating a forward-thinking approach to design, ensuring a respectful and meaningful bridge between the past, present and future and to bring the community along on this journey. As it stands, this is not the case. I have grave concerns about the proposed rezoning and redevelopment of the North Eveleigh and do not endorse this proposal.

I agree to the above statement

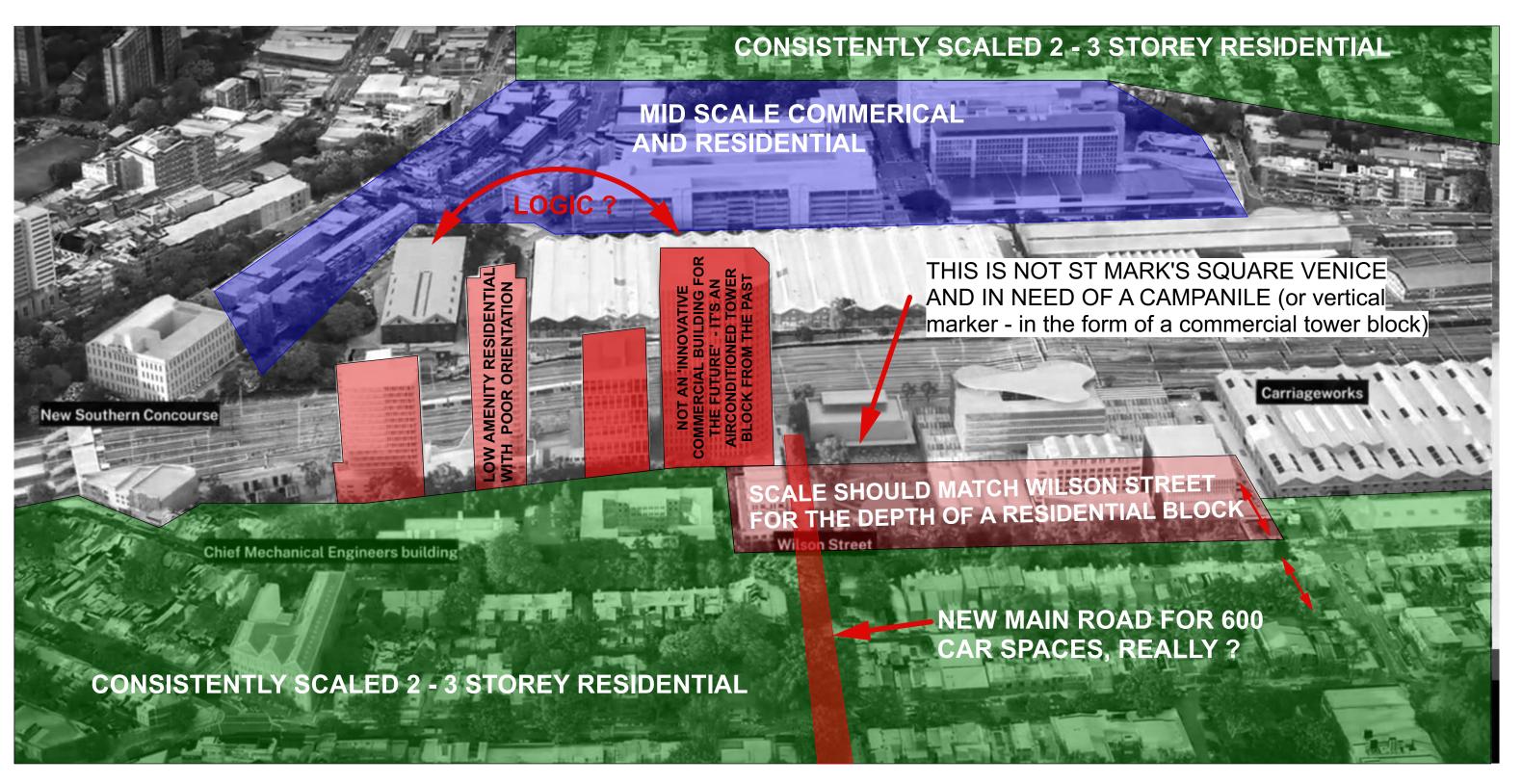
Yes

VIEW SELECTED BY PROPONENTS TO MINIMISE VISUAL IMPACT OF NEW TOWERS AND MAKE THEM LOOK CONNECTED TO OTHER TOWERS - NOT REPRESENTATIVE OF THE SITUATION - IMAGE MISLEADING



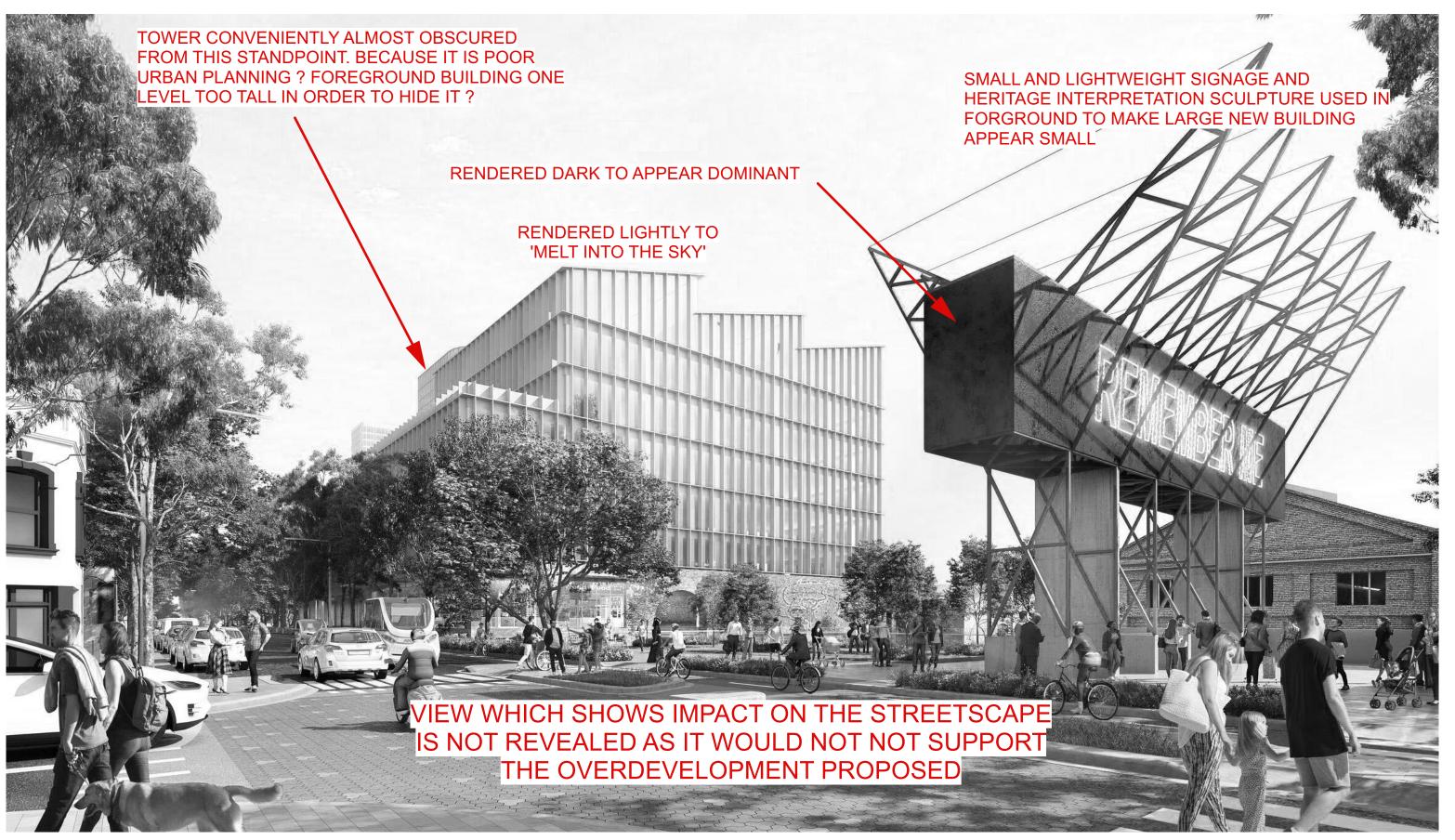
THIS PROPOSAL REPRESENTS AN URBAN DEVELOPMENT TYPOLOGY WHERE RANDOM TOWERS ARISE BECAUSE POLITICS AND MONEY OVERIDE COMMUNITY & DEMOCRACY, COUNTRY AND PLACE.

## **INCONGRUOUS MASSING AND MUDDLED USES - OVERDEVELOPMENT**



PROPOSAL MIS-PRESENTS URBAN CONCEPTS OF RESPECT FOR HERITAGE AND COUNTRY IN ITS STATEMENTS.
RESPECTING HERITAGE WOULD DEMONSTRATE CONSIDERATION OF THE SCALE OF WILSON STREET.

## ALL MISLEADING IMAGES GENERALLY DO NOT REPRESENT THE IMPACT OF THE SCALE OF NEW BUILDINGS ON WILSON STREET



WHY NOT PREPARE IMAGES WHICH ARE NOT JUST FOR TFNSW MARKETING?
LETS TAKE A LOOK AT ACTUAL URBAN IMPACT ON THE HERITAGE STREETSCAPE

## MISLEADING IMAGES GENERALLY DO NOT REPRESENT THE IMPACT OF THE SCALE OF NEW BUILDINGS



WHY ARE "INDICATIVE VIEWS" BEING SHOWN TO THE PUBLIC - IMAGES SHOULD BE AS REAL AS THEY LOOK