1 Introduction

The Planning Institute of Australia (PIA) is the peak professional body representing professions involved in planning Australia’s cities, towns, regions and places. PIA is a not-for-profit association delivering benefits to over 4,200 members nationally. Our members are drawn from a range of planning professions – urban and regional planning, social planning, urban design, environmental planning, economic development planning, transport planning and planning law.

The shared core interest of PIA, as stated in its Constitution is:

“the community, and the education, research and practices relating to the planned use of land, its associated systems, and of the natural and built environmental, social and economic impacts and implications of the use of land”.

The following submission is lodged on behalf of the NSW Division of the PIA.

2 Overview

The NSW Government aims to achieve urban renewal in Redfern-Waterloo through the Redfern-Waterloo Plan which will include:

- A human services plan;
- An employment and enterprise plan; and
- A built environment plan.

The argument is that these, working together, will achieve the government’s aims.

PIA welcomes a coordinated government focus on Redfern-Waterloo which could achieve sustainable social, environmental and economic outcomes for the area, but believes that these instruments alone will not achieve these aims and that more is required if this is to happen.

PIA’s analysis of why this is the case, and what else is required, is set out in the following sections, which cover:

- Issues relating to urban renewal and the Redfern-Waterloo Plan (RW Plan); and
- Issues relating to the draft Redfern-Waterloo Built Environment Plan (BE Plan).
3 Urban Renewal and the Redfern-Waterloo Plan

The NSW Government is attempting to achieve urban renewal for the whole of the Redfern-Waterloo (RW) area by shaping those aspects over which it can exercise control. However significant aspects of the area are beyond its control. This leaves a patchwork of activities, projects and planning controls for which at this stage there are no appropriate governance mechanisms and no integrated framework for implementation.

Without appropriate action, this problem will escalate as:

- The RW Plan has a projected 10 year life span;
- At this point the RWA is dealing with Stage 1 of the RW Plan only; and
- Over time, the management of the different components of the RW Plan, and of their relationships with each other and with external factors, will become more complex, and without an integrated framework and relevant governance mechanisms, the focus may become so diffuse that the RW Plan fails to meet its long-term - or even its medium term - objectives.

The following table provides a summary of the way responsibility is currently shared, or could potentially be shared, on some of the key issues affecting the RW Plan.

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<th>Agency</th>
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<td><strong>Current:</strong></td>
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<td>Redfern-Waterloo Authority (RWA)</td>
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<tr>
<td>Planning for the State significant sites only</td>
<td>Part of area only</td>
<td>Interaction with planning issues for the remainder of the area.</td>
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<td>Examining housing affordability</td>
<td>Whole of area</td>
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| Reform of human services in the area | Whole of area | At this stage (Phase 1), only deals with those human services related to children and families, young people, and Aboriginal people.
- Phase 2 issues (older people, people with disabilities, homeless people and migrant communities) not yet addressed.
- Core services such as schools and hospitals are excluded from the reforms. |
| Employment creation | Whole of area | Employment and Enterprise Plan embryonic. Draft is little more than discussion paper.
- Availability of jobs does not ensure access to jobs. |

| **Potential:** |
| Bringing additional State significant sites within the BE Plan | Part of area | Public Housing sites already flagged for Stage 2 of BE Plan.
- Timing and phasing of BE Plan extensions beyond Stage 1. |
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| Planning Institute of Australia, NSW Division | Making a land use plan for all of RWA operational area                     | Whole of area                 | • Extent to which plan would conflict with, or complement, planning for adjacent areas by CoS.  
• Timing and phasing of BE Plan extensions beyond Stage 1. |
| Council of the City of Sydney (CoS)        | Current: Planning responsibility for the remainder of the area              | Everything except areas controlled by RWA | • Interaction with RWA planning issues.                                     |
|                                            | Community services                                                         | Whole of area (but for its services only) | • Interaction with RWA’s reform of human services and with human services agencies’ planning and service provision. |
|                                            | Employment creation                                                        | Whole of area                 | • Interaction with RWA’s Employment and Enterprise Plan and with relevant activities of other NSW (and some Commonwealth) agencies. |
| NSW Human Services Agencies                | Current: Service provision                                                 | Whole of area                 | • Interaction with Redfern-Waterloo reform of human services and CoS community services |
| Roads and Traffic Authority Other relevant NSW Transport Agencies | Current: Construction of roads and management of traffic                   | Major roads in whole of area  | • Holds key to solution to traffic issues which must be resolved for town centre to function as planned by RWA. |
|                                            | Transport solutions                                                        | Local transport in area        | • Local transport within the area is poor – for access to shopping, health care and open space.  
• Transport strategy flagged as future key area. |

The above is not a complete account of the interrelationships between the activities of the RWA and those of other agencies. The activities of the Commonwealth government, and those of the numerous non-government agencies in the area, also play a vital role in the area and are critical to a sustainable future for it. However even this limited analysis indicates that integrated governance mechanisms and implementation plans are essential for both the Redfern-Waterloo Plan as a whole, and the part that the built environment plan plays within it.

The essence of the problem is that:

- The RWA is using part of the area, the State significant sites, to achieve sustainable social, environmental and economic outcomes for the whole of the area;
- There is so far no vision articulated for the area as a whole, and therefore limited capacity to evaluate:
  - How well the three aspects of the RW Plan will work together to achieve these outcomes;
  - What else is needed to complement these plans to secure a sustainable future for the area;
There is no management framework (including appropriate governance and implementation arrangements) to allow:
- Joint identification by the community and those with responsibility for the area of all the above; and
- Integrated planning and action to achieve them.

Without the above the RW Plan will be limited essentially to a redevelopment plan for the current State significant sites and any others that may be added (as foreshadowed on p 4 of the BE Plan).

At this point it should be noted that the governance structure suggested by the RWA (p 20 of BE Plan) is “the draft Plan supported by a SEPP … and the initiatives of the Human Services Plan and the Employment and Enterprise Plan”. This does not constitute a governance structure, but simply highlights some of the matters that need to be brought within its scope.

Given the RWA’s focus on the Built Environment Plan as a “living document”/“evolving document” (pp 2 and 4 respectively of BE Plan), it is also important that a well developed community participation strategy is articulated and adopted for the Redfern-Waterloo Plan’s proposed 10 year life span, and that this is integrated into the management framework. A good model for this is the NSW Government’s award winning guidelines for Community Engagement in the NSW Planning System, now hosted on the PIA NSW website at http://203.147.162.100/pia/engagement/index.htm.

All these issues go beyond Redfern-Waterloo as the NSW Government has indicated in some of its Metropolitan Strategy documents that the Redfern-Waterloo approach is likely to be a model for other areas of Sydney identified as in need of urban regeneration. It is therefore important to get the model right.

4 The Draft Redfern-Waterloo Built Environment Plan

The Draft Redfern-Waterloo Built Environment (BE) Plan comprises the following strategies:

- Land use and zoning;
- Urban design;
- Public domain;
- Infrastructure;
- Heritage;
- Transport; and
- Utility services.

PIA’s comments on each of these are as follows:

4.1 Land Use and Zoning

General

PIA supports the intention to use land use and zoning to drive better social and economic outcomes. Our main concerns in this area are the assumptions underpinning the specific land uses and zoning as suggested in the RW Plan.

The key assumption appears to be that the creation of a large amount of commercial floor space will create jobs, many of which will be available for the local community.

Leaving aside the issue that the creation of commercial development opportunities does not ensure that they are taken up, which is the difficulty faced by all land use planning, there are still several flaws in this assumption.
One flaw relates to the assumption that if the jobs are available, local people will have access to them. However:

- Local people may not have the education, skills or experience for these jobs and it is not clear that the Employment and Enterprise Plan, even linked to the Human Services Plan, will be sufficient to overcome these problems; and
- Similar jobs have been available in the nearby Sydney CBD and Alexandria for many years, without local people being able to obtain access to them in great numbers.

It is obvious that ensuring access by local people to local jobs will require a sustained, integrated effort, particularly in view of the Commonwealth’s recent “welfare to work” reforms, which potentially affect a large number of Redfern-Waterloo residents.

**High Value-Added Industrial Growth**

On the other hand, the BE Plan also needs to encourage development that recognises the opportunities the area provides to address several of Sydney’s longer term economic needs.

Among these are the need to promote high value added industrial growth. The Australian Technology Park (ATP) is delivering this, having become the main zone of advanced technology research in Sydney. The potential for the area to continue this role into the longer term needs to be acknowledged, given its strategic location near the three inner universities and the Sydney CBD and the highest rail access in Sydney.

The BE Plan’s provisions for the ATP to accommodate further development is supported, but even with these provisions, it is likely that room for new and expanding enterprises, spun off from ATP research and networks, will run out in the medium term. It is therefore critical for the BE Plan to provide development potential in surrounding precincts, giving access to ATP research and networks, so that high value research-based activity is not stifled by lack of accommodation.

In this regard, PIA considers that the North Eveleigh precinct should include zoning and controls that allow enterprises associated with ATP activities to locate and expand there, particularly in Area A which could be 100% residential under the BE Plan. It is not considered that the proposed mixed use zoning there, for example, will allow this to happen. A zoning that is compatible with ATP-type activities will also potentially enhance the proposed cultural precinct there, by encouraging high growth activities that combine advanced technology with vibrant cultural activities, such as new media. This combination is being adopted in a number of overseas cities to encourage globally competitive sectors that draw on existing city strengths.

**Social Equity**

PIA is also concerned at the way the land use proposals affect the future of the Aboriginal Housing Company’s Pemulwuy Project for The Block. In summary, the position is:

- The Block currently enjoys a floor space ratio (FSR) of 1:1, with no limitation on the residential component;
- The proposal for the Eveleigh Street site (Area D), within which the Block is situated, increases the FSR from 1:1 to 1.5:1; and
- However, it also limits the residential component to 0.5:1 (ie to one third of total floor space).

This stands in contrast to the treatment of:

- Government-owned Area C (eastern section of North Eveleigh site), which is a similar distance from Redfern Station, and has an FSR of 2:1, half of which may be residential; and
- The town centre site immediately adjacent to Redfern Railway Station (Area F), for which the proposed FSR is 7:1, without (according to Diagram 3.4, and despite the text on p 51 of BE Plan) any restriction on the proportion of residential use.
Open Space

Significant levels of new residential population are allowed by the BE Plan, yet very little new open space is proposed except for areas within the ATP. ATP open space will provide an inviting context for new ATP activities but, as with landscaped areas in other employment zones, should not be expected to address the need for new open space for the extra population.

The lack of new zoned open space in the North Eveleigh precinct is of particular concern. The surrounding area already has a dense population, and the BE Plan’s facilitation of a significant new population in the precinct will add to the load. Yet it is an area with almost no public local open space – it is a long walk to Victoria Park. The BE Plan misses an opportunity to use the holdings of public land at North Eveleigh to not only provide open space for the new residents on that land, but also to ameliorate the existing lack of open space.

The densities proposed for North Eveleigh indicate that there will be little outdoor space in new dwellings there. Thus new residents will need access to local public open space at a higher level than the average Sydney resident, because of the well-above average densities being proposed. The opportunity to provide new open space on publicly-owned brownfield sites in Sydney is rare, and PIA is concerned that such an opportunity is not being taken up here.

Unless open space zoning is made at the plan-making stage, there is little likelihood that open space will ever be provided in such precincts, to the detriment of future generations of residents. Lack of local open space provision will either force residents to seek more indoor recreation pursuits, or generate greenhouse and other externalities by forcing them to drive to wherever existing open space is located (assuming parking nearby is available).

The nature of the present Redfern-Waterloo community, and the nature of the local transport in the area, are also issues here. In a community in which half the residents do not own cars, and transport services primarily pass through the area on their way to or from the city, access to local open space is a very important issue.

4.2 Urban Design

PIA commends the intention to ensure high-quality urban design and architecture for the State significant sites. Whether that intention is realised will depend to a large degree on matters not yet in the public domain, particularly the Development Control Plan (DCP) for the RWA strategic sites which will be prepared to complement the related State Environmental Planning Policy (SEPP) and “provide more detailed site-specific guidelines for future development” (p 6 of BE Plan; see also p 68).

PIA would appreciate clarification of how this intention, and the intention to encourage public participation in this aspect of the planning process, will interact with either or both of:

- The staged DA provisions in Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act), including the s 83C ‘staged DA as alternative to DCP’ provisions; and/or
- Clause 12 (3) of the proposed SEPP (Part 3 The Redfern-Waterloo sites, Division 2 Provisions relating to development of Redfern-Waterloo sites - p 9 of draft SEPP), which appears to allow the Minister to approve a concept plan which exceeds the FSR and building heights set out in the maps associated with the SEPP.

4.3 Public Domain

PIA commends the intention to create an attractive, welcoming public domain which will both provide local amenity and attract people to Redfern as a destination.
However, there are local and regional factors which will significantly affect whether this is possible.

One example is the proposed town centre. Wind is already an issue in the town centre area, and careful attention will need to be given to the design of the proposed 18 storey buildings if a wind tunnel is not to undermine the area’s amenity.

Current traffic flows along Gibbons and Regent Street are also an issue for the town centre. PIA is aware that this is an issue the RWA would like to address, but the RWA admits itself that the matter is outside its control, and that a solution “may not be imminent” (p 15 of BE Plan).

This issue receives more attention in the section on Transport later in this submission.

4.4 Infrastructure

The RWA includes public domain improvements, the redevelopment of Redfern railway station, and affordable housing in its infrastructure strategy.

None of these will receive any funding from the NSW Government, but will depend on development levies, sale of government land with development approval, borrowings, partnerships with other State government agencies, and partnerships with the private sector (p 26 of BE Plan). The only specific linkage between these sources and affordable housing is the reference to the levies from future development within the Carlton and United Breweries site (p 26 of BE Plan).

The Plan also notes that an “Affordable Housing Program, Affordable Housing Contributions Plan and Contributions Plan for Public Amenities and services will be prepared and will complement any plan governing development in the area” (p 26 of BE Plan).

As the draft Redfern-Waterloo Built Environment Plan was published before the recent amendments to the EP&A Act, PIA would appreciate clarification of how the new provisions relating to special contributions areas will interact with the infrastructure proposals outlined in the draft Plan.

4.5 Heritage

PIA supports the retention of identified heritage items in the area. However, the BE Plan does not contain any specific strategies to ensure that these items are retained.

Under the Redfern-Waterloo Act 2004 as recently amended, the provisions of the Heritage Act 1977 do not apply to Part 3A or Part 4 development applications, and the only requirement is for consultation with the Heritage Office.

The BE Plan uses vague terminology such as “In some cases, Conservation Management Plans for some strategic sites may need to be prepared to identify existing significant heritage items to be retained and appropriate management” (p 26 of the BE Plan).

In our view, the heritage strategies contained within the BE Plan are insufficient to ensure protection and retention of identified heritage items.

4.6 Transport

Traffic Volumes

PIA is concerned that rezonings under the BE Plan will occur before adequate transport planning has been concluded. It is imperative that planning for traffic flows with higher pedestrian amenity in
Regent and Gibbons Streets be in place before developments under the proposed rezonings in those streets are approved.

The BE Plan is also likely to generate unsustainable traffic loads in other parts of the RWA area unless such planning is brought forward. For example, Area A has proposed high density uses, but the site would be beyond walking distance of Redfern station for many people living or working there. It is therefore likely to produce unacceptable levels of traffic in surrounding streets and add to the already heavy load on City Road/King Street without firm counter measures involving restrictions on parking allowances and the like.

**Local transport**

Local transport services are also an issue in Redfern-Waterloo, especially given its low rate of car ownership. This has been raised above, in relation to access to open space. However, it is also an issue relating to access to supermarket shopping, and to health facilities.

### 4.7 Utility Services.

There are only a few brief paragraphs on this issue in the BE Plan (pp 16 and 29), which give too little information to enable PIA to comment.

Despite this, the reference to developer costs does raise the question of the potential interaction between this matter and the contributions issues raised in the section on Infrastructure earlier in this submission.