

26 August 2022

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### **Re: National Trust objection to Redfern North Eveleigh Paint Shop sub-precinct rezoning proposal**

As the State's leading voice for heritage protection, the National Trust has long advocated to ensure the unique and exceptional heritage values of Eveleigh Railway Workshops are retained, respected and reinterpreted for future generations. We are grateful for the opportunity to make a submission but are disappointed that we were not consulted earlier as a key stakeholder.

The Trust are continuing to look into the various aspects of this proposal and may make further submissions given the size and nature of what is being put forward.

#### **Summary of Position**

In the 1980s, Eveleigh Railway Workshops was one of the premier heavy-industrial and railway heritage places in NSW and was considered to be one of the most impressive of its type in the world, in its scope and survival of early twentieth century machines and equipment. The National Trust has been advocating from that time for redevelopment of the Workshops in a manner and for a purpose that reflects and celebrates that heritage.

Much has changed at Eveleigh since the 1980s and the Trust does not advocate for any attempt to recreate what has already gone. However, the much of what has occurred reflects an attempt to realise the 'greenfield' development potential of the real estate contained at Eveleigh, with the heritage of the place given little priority and even less in relation to the nature and relevance of the adaptive reuses which have already occurred.

The Paintshop rezoning proposal continues this trend, with heritage reduced to the retention of the existing buildings as empty shells to be filled with any commercial use, and tower buildings rising out of its centre. The insertion of residential tower buildings through the site cuts its legibility into chunks, destroying the overall unity of the site and filling in the spaces between existing buildings with large rectangular building blocks; even the proposed open space has a serious impact on highly significant remnant features such as the fan of tracks, that do little to acknowledge the history and significance of the place.

Eveleigh provides an almost unique opportunity for the conservation of rail heritage in an accessible location with full facilities for both the rail operations aspect and the public access and availability aspect of rail heritage. The flow-on effect of these developments upon the general circumstances for conservation, and public involvement in Rail heritage in NSW are significant.

The purported economic, commercial and social benefits of this modification do not outweigh its considerable, negative effects.

These concerns are not unique to the National Trust. We note that the Heritage Council, in their April 2022 Metering Minutes, had the following concerns:



- The Council raised concerns related to the scale of development, masterplan and yields and ramifications for heritage and conservation of the Paint Shop Sub-precinct
- The Council noted that the Statement of Significance should be an accurate representation of the current state so that it may be used as a strong reference point to guide any future development in the precinct. The Council discussed the opportunities and potential impacts that may be derived from the proposed amendments to the Statement of Significance and Design Guidelines and reiterated their preference for a whole of precinct approach rather than North and South Eveleigh being considered separately.

They further resolved that, inter alia, the NSW Heritage Council:

1. Expressed its serious concerns about the planning proposals for Redfern North Eveleigh, in particular a proposed building over the Paint Shop.
2. Expressed its serious concerns about the refusal by TfNSW to produce updates to the Statement of Significance, the Conservation Management Plan, and an integrated approach for North and South Eveleigh.

***As a consequence of the above, the National Trust of Australia (NSW) objects to the proposed Redfern North Eveleigh Paint Shop sub-precinct rezoning proposal in its current form.***

### **The Proposed Rezoning of the Paint Shop Sub Precinct**

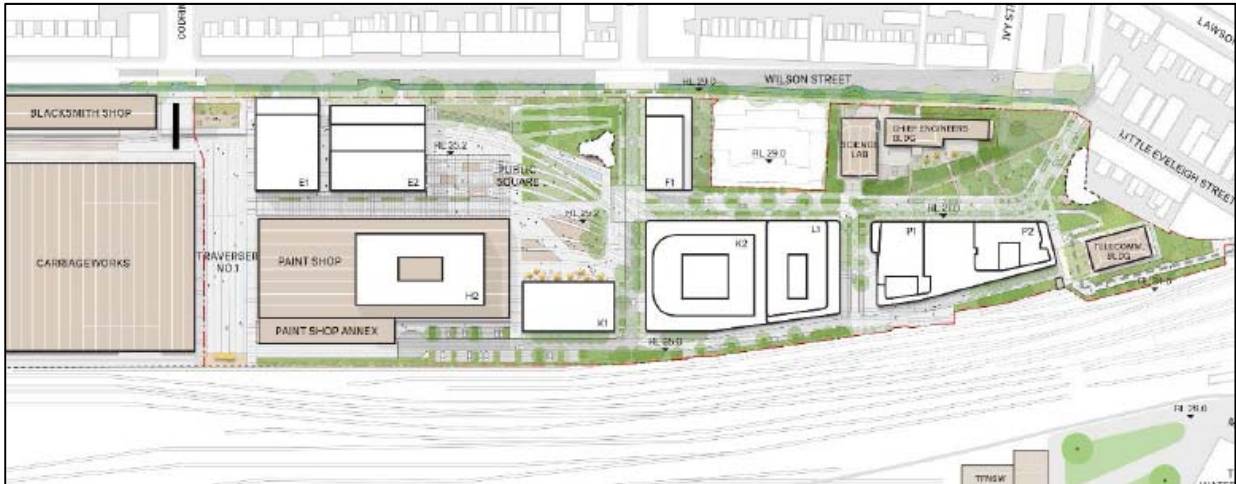
It is our understanding that the Redfern North Eveleigh Precinct comprises three sub precincts, however, the State Significant Precinct (SSP) Study on exhibition proposes amendments to the planning controls only for the Paint Shop Sub-Precinct. This is a 5.15 hectares site adjacent to Wilson Street in Darlington, with clear visual relationship to South Eveleigh and the Eveleigh Locomotive Workshops across the active rail corridor.

The proposal Rezoning allows for:

- Approximately 1.4 hectares of publicly accessible open space including two public squares and a park
- Retention of over 90 per cent of existing high value trees with active transport infrastructure and routes and the establishment of an east-west pedestrian thoroughfare
- A maximum of 142,650 square metre gross floor area (GFA) activated ground level frontages for commercial, retail, food and beverage and community and cultural uses, comprising:
  - between 103,700 - 109,550 sqm GFA for employment and community facility floor space (minimum 2,500 square metres)
  - between 33,100 - 38,950 sqm residential GFA (approx. 381 to 449 new homes)
- Adaptive reuse of heritage buildings for employment, cultural and community uses and the construction of new buildings for the Sub-Precinct, including:
  - Commercial buildings along the rail corridor that range between three and 26 occupied storeys.
  - Mixed use buildings along the rail corridor, comprising a three-storey non-residential podium with residential towers ranging between 18 to 28 occupied storeys.
  - Mixed use buildings (commercial and residential uses) along Wilson Street, with a four-storey street wall fronting Wilson Street and upper levels at a maximum of nine occupied storeys.
  - Commercial building on the corner of Wilson Street and Traverser No. 1, with a four-storey street wall fronting Wilson Street and upper levels at a maximum of eight occupied storeys that are set back from the street wall alignment
- Potential options for a commercial addition to the Paint Shop building comprising of commercial uses. These options (all providing for the same GFA) include:
  - Five-storey commercial addition to the Paint Shop building with a three metre vertical clearance, with the adjacent development site to the east comprising a standalone three-storey commercial building (represented in Figure 3); or



- Three-storey commercial addition to the Paint Shop building with a three metre vertical clearance which extends and connects to the commercial building on the adjacent development site to the east; or
- No addition to the Paint Shop building, with the adjacent development site to the east comprising a standalone 12-storey commercial building.



**Figure 1:** Indicative site plan for the proposed rezoning



**Figure 2:** Proposed rezoning and redevelopment of the Paintworks, looking north from above the Carriageworks.



## The Significance of Eveleigh and the Paint Shop sub-precinct

The exceptional significance of the Eveleigh Railway Workshops as a whole is indisputable. The National Trust of Australia recognized the significance of the Eveleigh Railway Workshops in 1986, when they were listed on the National Trust Register. The reason for listing noted that:

***“Eveleigh Railway Workshops serve as the greatest monument to the history of transport in NSW.”***

Following the Trust’s 1986 heritage listing, Eveleigh was listed on:

- Register of the National Estate, 1988
- State Heritage Register:
  - Eveleigh Railway Workshops, 1999  
*“The entire complex has a strong industrial character generated by the rail network itself, by the large horizontal scale of the buildings, the consistent use of brick and corrugated iron, the repetitive shapes of roof elements and of details such as doors and windows...”*
  - Eveleigh Railway Workshops machinery, 1999
  - Eveleigh Chief Mechanical Engineer’s Office and Moveable Relics  
*“The building is a very fine late Victorian railways office on a scale above all other such structures in the State. The building reflects the importance of the railway engineers in the development of the State and its closeness to the Eveleigh workshops (mainly under the control of the Mechanical Branch) indicates the confidence in railway construction.”*
- State Environmental Planning Policy, (State Significant Precincts) 2005
- State government agency Section 170 Register
  - Eveleigh Carriageworks
  - Eveleigh Railway Workshops  
*“The place is of international significance and is one of Australia’s finest industrial heritage items. The value of the place is increased by the fact that it is comprised of assemblages, collections and operational systems rather than individual items.”*

Numerous heritage assessments, archaeological assessments and Conservation Management Plans for the place have been prepared since the railway workshops closed, all reiterating the exceptional significance of the complex as a whole, and noting that it is far more than the sum of its individual parts. For instance, the 2002 Conservation Management Plan (OTC) states:

*The Eveleigh Carriageworks together with the Eveleigh Locomotive Workshop site forms the Eveleigh Railway Workshops complex, which is of exceptional significance nationally and internationally as one of the best surviving examples of railway workshop complexes. Buildings, open spaces, circulation, rails, machinery, moveable items and services demonstrate the processes of railway manufacture, as well as the maintenance of engines and carriages and the evolution of these processes to technological and operational change between 1887 to the present day. The site layout divided by the main railway line is rare in comparison to other railway workshop complexes.*

*The Eveleigh Carriageworks has landmark qualities experienced in the views and vistas to the site, particularly from the railway line, where the size of the complex, the scale of the facades the spatial arrangement of the buildings and elements on the site distinguish it from other sites. Viewed from a passing train, the Carriage Workshops on one side and the old Locomotive Workshops on the other, it is one half of a gateway that visually defines a point on a journey to or from the city. The site is iconographic, symbolising the past phenomenon of the greatness of railways.*

## Inconsistent Heritage Studies and Gradings of Significance

A number of supporting heritage reports have been tabled as part of this application, including:

- Aboriginal Heritage Study (includes impact assessment) – Paintshop sub-precinct
- Non-Aboriginal heritage Study (includes impact assessment) – Paintshop sub-precinct
- Updated overarching Conservation Management Plan - Eveleigh Workshops in its entirety
- Addendum to overarching Conservation Management Plan - Eveleigh Workshops in its entirety
- Heritage Interpretation Strategy - Redfern North Eveleigh Precinct Renewal Paint Shop Sub-Precinct



The National Trust are having difficulty understanding the various heritage reports and their recommendations, and the way these have been updated. In particular we are interested to locate the original endorsed 2017 *Eveleigh Railway Workshops Overarching Conservation Management Plan* by OCP Architects prior to this document being updated by Curio Projects “with minor edits and additions to update for 2022 (as commissioned by Transport for NSW).”

Over many years, the gradings of significance for Eveleigh and its elements have been adjusted in numerous heritage assessments. For example, the statement of significance in the State Heritage Register citation for the Eveleigh Railway Workshops states:

*The Eveleigh Railway Yards are some of the finest historic railway engineering workshops in the world ... **The place is of international significance** and is one of Australia's finest industrial heritage items.*

The earlier, 2002 Conservation Management Plan mirrors this assessment and notes:

*The Eveleigh Carriageworks [which includes the Paint Shop sub-precinct] are of **national significance**. In combination with the Eveleigh Locomotive Workshops...the Carriageworks form the Eveleigh Railway Complex, which is **of international significance**. The Eveleigh **Carriageworks are of national cultural significance**.*

The Non-Indigenous Heritage Study (p.198) states that, where necessary, gradings of significance have been re-assessed to provide a more comprehensive picture of the site’s heritage values, and that where the assessment of gradings of significance differ between OCP 2017 report and Curio 2021, the reasons for this have been discussed in the relevant subsections. However, we can find no explanation or reason in the documentation. Various gradings of significance are shown in the following table:

Item	2002 CMP (OCP)	2022 Overarching CMP (OCP with Curio edit)	2022 Non-Aboriginal Heritage Study (Curio)
The Paint Shop building	International/National	Exceptional	State/Exceptional
The Paint shop Extension/Formal Suburban Car	Local	High	State/High
The Chief Mechanical Engineers building and its moveable heritage	State	Exceptional	State/exceptional
The Telecommunications Equipment Centre	State	High	State/high
The Scientific Services Building No. 1	State	High	State/Exceptional
Traverser No. 1	International/National	Exceptional	State/high
The Fan of Tracks	International/National	Exceptional/high	State/high
Elston’s Sidings and Buffers	n/a	Moderate	State/high (in situ) Moderate/local (new location)
Interlocking Store, Southern Store, and Brick Toilet (c.1912)	Neutral	Little	Little
Compressor House (1913)	State	Moderate	Local High (compressors) Little (building fabric)
Brick Retaining Wall (Pre 1887)	State	High	State/high
Overbridge Footings (1914)	n/a	Moderate	Local/moderate
Trackfast Depot/ Outward Parcels Depot (1956)	Neutral	Moderate	Little

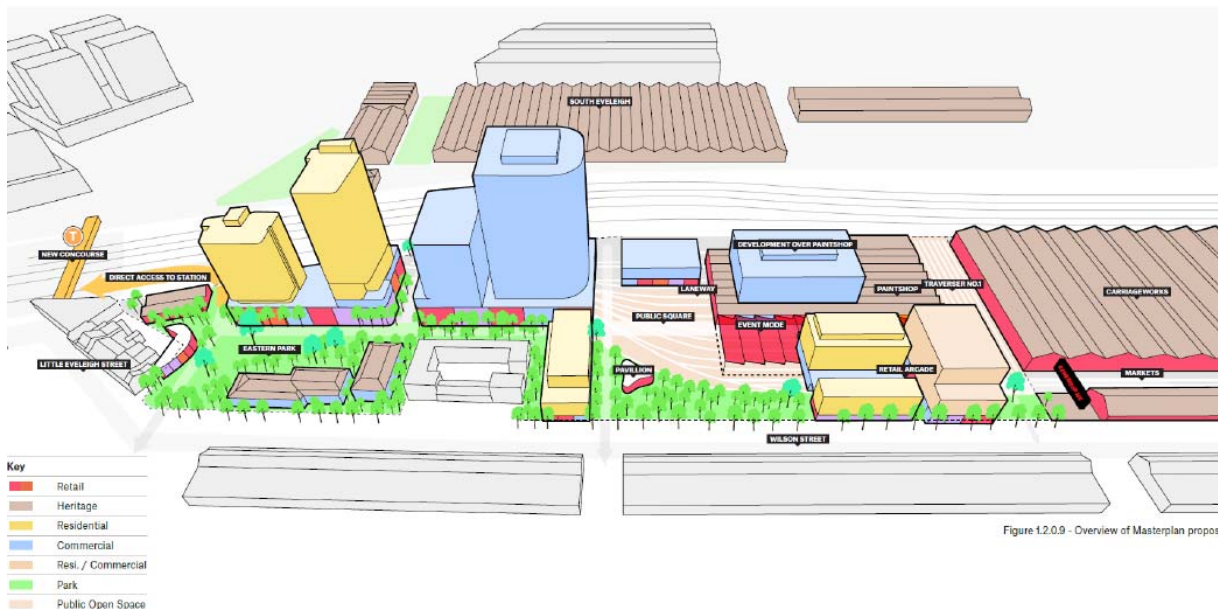
Heritage analysis and terminology does change over time, however there appears to be a general downgrading of significance from international and national to state. As these reports are relied on to inform the parameters for what will and will not constitute appropriate development at Eveleigh (because prior to any consent being granted the consent authority is to be satisfied that any proposed development is consistent with the updated Conservation Management Plan and addendum), an understanding these changing levels of significance and their associated flow-on policies is critical to any assessment of the rezoning proposal.



### Proposed bulk, height and scale

The proposal seeks to increase gross floor area (GFA0) across the site by more than 60% from the approved concept. It also proposes to increase building heights to a range between 3m to RL128.2m, which equates to a maximum of 28 storeys. Broadly, this includes:

- mid-rise buildings with a five-storey street wall along Wilson Street, rising to up to 9 storeys set back from the street alignment;
- higher rise buildings located toward the rail corridor, comprising a mix of larger floorplate buildings that will support commercial uses, which range between sixteen to twenty-six storeys;
- podium and taller buildings that will support commercial, retail and community uses in the podium levels, and residential uses within the taller buildings which range between eighteen to twenty-eight storeys;
- a five-storey addition to the Paint Shop building;
- small-scale pavilions located within proposed publicly accessible open spaces that range between one to two storeys.



**Figure 3:** Illustration of proposed Urban Design Framework, Redfern North Eveleigh Paint Shop Sub-Precinct: State Significant Precinct Study - Planning Report, p.38

The extremely large scale of the development does not respect the low scale of the surrounding heritage conservation areas, in particular to Wilson Street and Redfern Station, nor does it fit with the existing, highly significant heritage character of Eveleigh defined in the State Heritage Register Listing for the place as being defined by the large horizontal scale of the buildings.

The bulk, scale and height of the proposal means that this impact will be felt on a much larger scale, and the numerous distant views presented in the views analysis illustrates this significant impact.



## Overbuild of Paintshop building

The National Trust is in full agreement with the Heritage Council advice to Transport NSW (March, 2022) on the proposed masterplan scheme was that:

*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. Its saw-tooth roof profile is particularly dramatic when seen against a clear sky and is a tangible reminder of this area's industrial past. **This is an aspect of the building which, in our opinion, should not be compromised.** There are other low rise buildings on the site, which should also be retained and re-used. North Eveleigh is the opportunity for a significant example of heritage led placemaking that is vibrant and commercially successful. **This opportunity is threatened by potential inappropriate overdevelopment by inserting a 5-storey tower through the roof of the Paint Shop...***

*...advocating a building on top of the Paint Shop, risking very serious heritage impacts and jeopardising the significance not only of that building, but of the whole complex...*

*... Proposed over-development at North Eveleigh will be in contrast to the more sympathetic and successful re-development at South Eveleigh.*



**Figure 4:** Illustration showing proposed addition above the Paint Shop.

We would also cite the successful adaptive re-use of the Harold Park Tramsheds as another example that supports this argument. The Trust however, disagrees with the exhibited documents claim that additional options were developed in a respectful way that allows the adaptive reuse and redevelopment of the Paint Shop Building “to ensure that there is future flexibility in the masterplan to allow for multiple approaches to the treatment of the building.” The proposed options and overbuild of the Paintshop are not respectful or sympathetic, they will have immense impact on the building and viewlines across the site, and they should not be approved.



## Views and Relationships

The Visual Impact Assessment only assessed 11 views in its report, across a 5.15 hectare site noted for the significance of its viewlines. This seems an extraordinarily low number of views on which to base its assessment. Many of the views shown are from positions where the proposed building is so large it does not even fit on the page - suggesting an alternative or larger-scale way of showing this impact needs to be employed.

We are concerned that the Visual Impact Assessment also disregards the earlier 2002 CMP – they rely on the latest Curio assessment which includes only 4 significant view lines, rather than the earlier assessment which notes a far larger range of significant views (Policy 2.1.6) that should be identified and retained in future work, including:

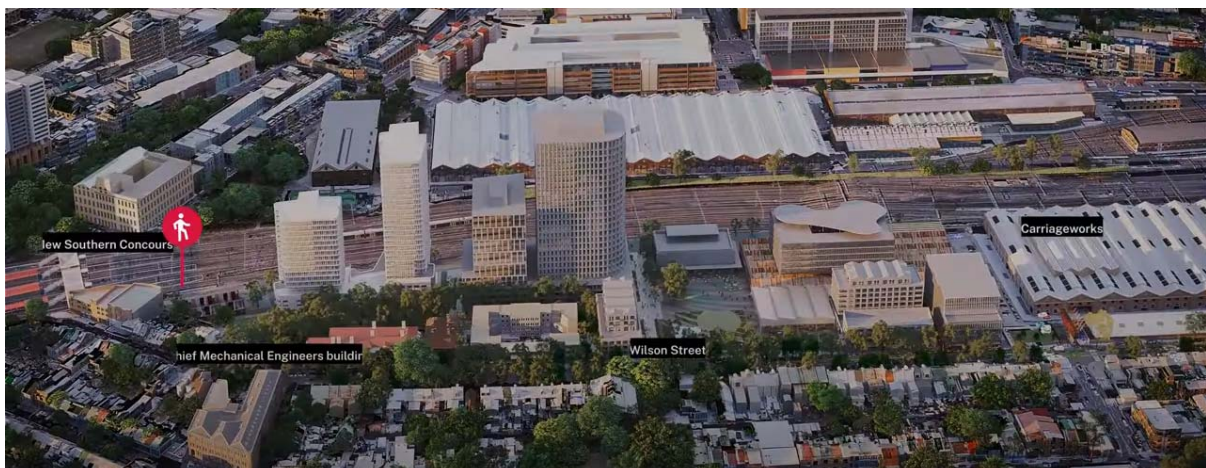
- to and from the main rail lines
- to the Locomotive Workshops
- from rear of the Chief Mechanical Engineer's Office
- from Codrington Street to the Carriage Workshops facade
- along the brick facade of the Blacksmiths Workshop on Wilson Street
- of the Chief Mechanical Engineers Building from Wilson Street
- glimpses from Wilson Street (near the CMEs building, near the Fire Brigade shed, at Codrington Street and from the west end of the Blacksmiths Workshop),
- through the site to the main rail line and the Locomotive Workshops.

The proposal is not consistent with the Study Requirements issued for the application, which required that it:

- Integrates with the view and visual assessment and seeks to preserve and enhance key views to and from heritage buildings (including visual connection between items).
- The visual analysis should also consider how the proposal impacts on the wider visual setting of the site including the visual connections to the broader Eveleigh Railway Workshops site and Redfern Railway Station as well as the adjacent heritage conservation areas

While the Visual Impact Assessment notes the proposal will cause *“a loss of visual permeability across the site and visual connection to and from some heritage items”* and that *“the magnitude of visual change is high”*, it justifies this by stating that proposed built forms proposed are not dissimilar in character, height or form to those included in the Approved Concept Plan and that *“the majority of the extent of visual change and loss of views to and from heritage items is caused by the Approved Concept Plan.”*

It should be noted that the earlier concept received strong public and professional criticism and was not supported. Using its approval as a justification is nonsensical. This large scale re-design of the Paintshop sub-precinct should have been used as an opportunity to correct earlier negative impacts on Eveleigh's significance, rather than compound them.



**Figure 5:** Redfern North Eveleigh Precinct – Paint Shop Sub-Precinct animation

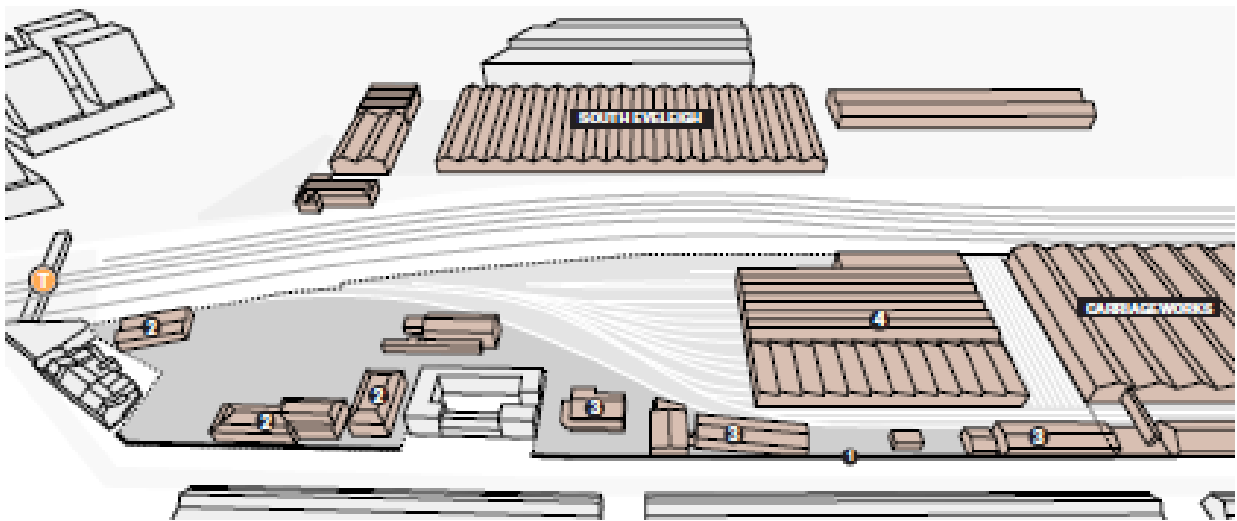




## Excessive Impact on Exceptional National Significance

The Non-indigenous Heritage Report correctly acknowledges that the height and density of the proposal will still result in a visual impact to the heritage context and character of the Paint Shop Sub-Precinct. Specifically, it acknowledges that:

- the obstruction of the view from the CME Building to the Locomotive Workshops by the new building envelope will have a **major visual impact to the historical context and significance and connectivity** between the North and South Eveleigh sites;
- the addition of the large scale and height of the new building envelope along the southern side of Wilson Street will **also be a minor to moderate visual impact to the “harmony and consistency” of the Golden Grove HCA** as visible both east to west along Wilson Street, as well as views south to the Sub-Precinct from other parts of the HCA, such as along Shepherd Street;
- the new northern built form will **impact significant views between the Paint Shop Sub-Precinct and other North Eveleigh Sub-Precincts**, although this impact has been reduced and partially mitigated via the introduction of the ground floor arcade into the design, allowance for continuation of the rail track along this east-west visual (and physical) axis;
- the minimal setback between the Paint Shop and new built form along the Paint Shop eastern façade is **not considered to be a sufficient curtilage around the heritage item** in order to retain appropriate views to the heritage item;
- over-landscaping of the remaining industrial heritage site (e.g. proposal to return of the vegetation to an earlier, pre-industrial state and the landscape buffer corridor between the rail line and new built form) would be inconsistent with the industrial heritage context and character of the Paint Shop Sub-Precinct and overall ERW, and would potentially **impact the legibility of the significant historic use and function of the site as the former Eveleigh Railway Workshops**.



**Figure 6:** Existing Eveleigh, with clear visual and functional relationships of the site complex intact.



**Figure 7:** Proposed Eveleigh, with clear visual and functional relationships of the site severely and irreversibly impacted and destroyed.



## Summary

The proposal for North Eveleigh Paintshop sub-precinct will have irreversible, significant impact on the exceptionally significant Eveleigh Railway workshops, a site of international heritage significance. Specifically, it will:

- Excessively impact the significance, legibility and relationship of the precinct to be read and understood as a “whole”, permanently severing the east and west sides;
- Result in extensive visual impact on the adjacent heritage conservation areas, significant for their low scale, Victorian streetscapes and their relationship to the railway yards.

The proposal includes fundamentally flawed proposals that will irrevocably impact the site’s Significance, including (but not limited to):

- Overbuilding the Paintshop;
- Obscuring of much of the fan of rails;
- Removal of buildings of moderate-high significance;
- Construction of new buildings that obliterate functional viewlines between elements of the site.

As stated earlier, we are still reviewing aspects of this proposal and may make a further submission. While the Trust generally agrees with the primary Conservation Policies expressed in the heritage documents for this project, we are at a loss to understand how these policies could lead to a proposal with such clear disregard for the heritage values of this important place.

Yours sincerely,

Jane Alexander  
Advocacy Manager