

**Locomotive Workshop Australian Technology Park SSD 8517 and SSD 8449- D538-18**

**IPC Meeting 30 November 2018 10:00am Oxford room 1, Level 1 Rydges Sydney Central, 28 Albion Street, Surry Hills 2010**

I am speaking as Co-Spokesperson of REDWatch a 15 year old group set up to try and deliver outcomes for the local community as well as for government and developers.

I sat on the RWA Built Environment Ministerial Advisory Committee and on Premier Keneally's Redfern Waterloo Heritage Taskforce that followed the successful campaign to keep an active heritage blacksmith in Bays 1 & 2.

I also sit on Mirvac's ATP Advisory Panel and their ATP Community Liaison Group and attend Heritage Stakeholder Meetings when they are held.

I want to start by saying that we are not simply dealing in this DA with a development within a another heritage building where that needs to be assessed is the impact on the heritage fabric. We are dealing here with a site that also houses an irreplaceable moveable heritage collection and has a complex range of heritage obligations. It is on the state Heritage Register and has a range of heritage documents and obligations.

## Heritage Covenant

When the site was sold by government, it then added an unprecedented heritage covenant on its title that included government like obligations on Mirvac in relation to the moveable heritage collection.

*We recommend that the covenant and its obligations be referenced as needing to be addressed in the condition relating to the Stage 2 Heritage Interpretation Plan currently **condition E4 by adding "and the heritage covenant" after the words "Division Guidelines" .***

**We welcome condition E9** regarding ongoing, curation, interpretation and conservation and recommend as that as this also covers areas covered by the heritage covenant that this also be referenced **by adding to the end of that condition "and compliance with the heritage covenant"**.

**Heritage Covenant should also be defined in the condition definitions.**

## Stage 2 Heritage Interpretation Plan timing

Of great concern to REDWatch is that this development is proposed to proceed before a stage 2 Heritage Interpretation Plan is finalised or in place. In effect the development is proceeding without the key heritage impacts and offsets being assessed. We are in "trust the developer" territory and given the tension between commercial floorspace return and the potential costs of best practice heritage interpretation we would like to see the stage 2 HIP accelerated.

Lets be frank, the equipment in the movable heritage equipment takes up floor space that could be used as commercial floor space. The risk is high if the Stage 2 Heritage Interpretation Plan is left until after fit out that heritage interpretation will loose out.

**We submit that condition E6 on fit outs being consistent with the Stage 2 HIP should stand and this means the HIP needs to be in place prior to fit out DAs.**

*We do not know where the heritage might end up because the stage 2 Heritage Interpretation Plan is not to be completed until prior to occupation rather than prior to construction. We had hoped that by now we would have a clear idea of how Mirvac intends to deal with its heritage obligations but we do not. That means that the mobile heritage collection will be packed up for construction without any guarantee as to what will come back where. We do not know how it will be displayed, maintained, promoted as a heritage attractor, and how the intangible cultural heritage it can help illustrate will occur.*

**We object to conditions E4, E5 and E6 being prior to Occupation. We agree with the Heritage Office that the Stage 2 Heritage Interpretation Plan should be approved prior to the first construction certificate. If this is not possible then it definitely needs to be in place prior to fit out DAs. We further object to the proponents proposal to amend E6. The stage 2 HIP must be in place before fit out DAs are assessed. This probably requires E4-E6 to move to either sections C or D.**

### **Protecting the Heritage Space in the Conditions**

It is precisely because there is no Stage 2 HIP that we are of the firm view that the approvals should be modified so that options for interpretation are not excluded by the approvals. For REDWatch there are at least 3 areas that need to be protected:

- 1. Bays 1 & 2 should be not be approved for non heritage related commercial purposes.** We argued in our submission that the loading dock should not be approved for this reason. With this looking like it will go ahead we are adamant that there should be no further encroachment on bays 1 & 2 until a Stage 2 HIP is agreed. These are the most intact heritage bays and there should be no loss of this space to commercial uses considered until an assessment can be made in

relation to the Stage 2 HIP. There are a range of issues here including the potential erosion of the amount of space dedicated for heritage interpretation and the potential for conflicting uses with a ramping up active heritage blacksmithing in Bays 1 & 2 South.

2. **Moveable Heritage** – Nothing in the current heritage collection should to be disposed of or decommissioned until after a Stage 2 HIP is in place and an independent assessment of its impact carried out. The entire moveable collection to be retained and be accessible on site. The suggestion that some of the collection be transferred for potential heritage trades use needs to have its viability and impact on the intactness of the moveable heritage collection independently assessed. There is in our view a commercial incentive for Mirvac to transfer equipment off site and for there to be further losses to the completeness of the collection they have an obligation to house, interpret, maintain and manage.
3. **Cultural Heritage** – The Stage 2 HIP needs to deal with the intangible cultural heritage, stories and heritage tourism attractors to the site. Space needs to be available for a potential historical records and artefacts repository and heritage centre.

#### **Places for Heritage Stakeholders**

REDWatch is concerned that to date heritage discussions have been handled by a Heritage Sub-Panel made up of the Heritage Office and Council and only occasional heritage stakeholder meetings. Heritage updates have been provided to other groups like the Advisory Panel and the Community Liaison Group.

**Given the importance of Heritage issues to the Locomotive Workshop we are of the view that the role of heritage stakeholders and independent heritage experts needs to be strengthened.**

We note Mirvac has argued that the existing Community Liaison Group should continue. This works for residents potentially impacted by the construction aspects of the development. This group does not however contain representatives from heritage interest groups that will have a particular interest in the Loco development and the Stage 2 HIP.

Rather than establish a wider Community Liaison Group for the Loco development **we propose that a Heritage Stakeholders Liaison Group be conditioned under B10 to “to ensure that the heritage community is kept informed and has an opportunity to feedback on the construction of the Locomotive Workshop and the Stage 2 HIP”.**

We further note that the Heritage importance of the Loco development and the Stage 2 HIP **also requires changes to The Community Communications Strategy C10 so that heritage groups and stakeholders are specifically covered by this strategy** and not just the adjoining affected

landowners etc. **The change should also be reflected into Condition C11** to ensure heritage interest people are consulted in relation to the development and the Stage 2 HIP.

Given the need for the above Heritage Stakeholders Liaison Group and the inclusion of heritage stakeholders in the Community Consultation Strategy precisely because the existing mechanisms are not adequate **we oppose Mirvac's submission to delete C13 entirely. We note there is flexibility in the condition wording to agree a timeframe with the Planning Secretary if required.**

There is a need to ensure input and involvement from the heritage community into the Stage 2 HIP. This is especially the case if it is not in place before construction. This could be done by an expanded Heritage Sub-Panel with the Heritage Stakeholders Liaison Group appointing two representatives and or external heritage experts to sit on such an advisory group alongside representatives of Council and the Heritage Office. Ideally, Heritage Sub-Panel representatives should also attend Heritage Stakeholders Liaison Group to ensure all heritage interests are aware of the concerns and views of others.

**Condition E4 should propose a panel to advise on the Stage 2 HIP made up of representatives of the Heritage Council, Council, relevant heritage experts and representatives of heritage stakeholders.**

Given the complexity of the moveable heritage collection and intangible cultural heritage reference sub-groups of people with expertise should be established to advise on the location and interpretation of the moveable heritage and on cultural heritage. This could also be done under E4.

In our submission we said that five questions needed to be asked about these DA's. Those questions were:

- How does the proposal deal with the heritage fabric of the building?
- How does the proposal deal with the active heritage uses as represented by the Blacksmiths?
- How does the proposal deal with the moveable heritage collection?
- How does the proposal deal with the heritage space in Bays 1 and 2 which are available to tell the story of Eveleigh?
- How does the proposal deal with the social and labour heritage of the site?

So far only the first of these have been the main focus of these SSDAs. The answer to the balance questions depend on what comes out of the Stage 2 HIP.

Mirvac have argued that The Loco development should be treated exactly the same as their Building 1, 2 and 3 but Loco is different. It is a heritage building on the State Heritage Register but it is not a new building in a heritage precinct. It also has a state significant moveable heritage equipment and obligations to interpret this unique space. This is what the stage 2 HIS is supposed to address but the proposal is we will not see it until the very end. We wanted to see it at the beginning. We want to know not just how they are going to treat the building (and they do have experience in dealing with heritage buildings) but also how they treat the heritage that they have not had experience with in the heritage equipment, heritage interpretation and intangible cultural heritage.

I urge you not to allow conditions that might pre-empt the Stage 2 HIP, rather I ask that you strengthen the processes so that the Stage 2 HIP can be as robust as possible.

The trust you will consider the amended conditions we have suggested in this context.

Geoffrey Turnbull

Co-Spokesperson REDWatch