

IPC Supplementary Submission RTBU RMA

Heritage Interpretation

In examining the Departments Assessment Report Heritage Interpretation is mentioned on many occasions but only in a general sense.¹

The RTBU RMA suggests there is a need to apply a common understanding of what heritage interpretation is. Two definitions which may be useful starting points is the one contained in Departmental Guidelines² and secondly the definition in an article by Professor L.Taksa.³

The Association recommends that basic definitions be applied so as the IPC is better placed to assess the material within the framework adopted.

What has been proposed for Heritage Interpretation?

The Association has noted in our submissions that the Department Assessment Report contains very little information pertaining to heritage interpretation. Its references to the 71 public submissions (65 objecting) are very scarce and few issues are listed as coming from the public submissions with none analysed.

The Association respectfully recommends that the IPC examine and investigate the submissions and include a report in its Determination.

The Association has been able to examine the submissions made by Mirvac to IPC. Similar to the Departmental Assessment Report very little mention is made to Intangible Cultural Heritage. (See comments on the Mirvac submission later in this Supplementary Submission.) The largest reference comes indirectly in that Mirvac seeks to include as a condition of consent, E6 a significant alteration to the timing and process for reviewing stage 2.

The Associations recommends that a number of documents need to be examined including the three underpinning Public Covenant documents (including the ERWIS 2012 which was endorsed by the CMP) with a view to understanding the history and progress or otherwise of various Heritage Interpretation issues.

In our presentation to last Fridays IPC hearing the Association by way of example went through the history of the Workers Wall and the Archive/Research Centre. There are other examples where references to Heritage Interpretation contained in the CMP or in proposals put forward by the Association have been ignored or not responded to despite material relating to them being provided by the Association e.g. Portraits and Red Square.

The Association notes that the Applicant in support of the creation of a supermarket in the Workshop looked at a number on local and international examples of similar supermarket offerings.

¹ Locomotive Workshop Assessment Report.P3 Executive summary "" the proposal includes heritage interpretation of the locomotive Workshop and the fixed and moveable heritage items."

² Heritage Interpretation Policy: NSW Department of Planning see p4 definitions and p7 item 4 audiences.

³ Machines and Ghosts: Politics, Industrial Heritage and the History of Working Life at the Eveleigh Workshops p73.

The Association notes that in the CMP reference is made to other Australian railway workshops adapted for reuse including the Midland Railway Workshops in WA, The Ipswich Railway Workshops in Queensland the Invermay Road or Launceston Workshops in Tasmania. In addition there are a number of international railway workshop heritage interpretation examples e.g. Swindon Workshops in the UK.

The Association recommends that the IPC look at the range of interpretative experiences that are offered in these workshops, their budgets, and the exhibitions, space, and curation offerings; the educational opportunities provided and the policies adopted to engage in cultural tourism and their outcomes.

Eveleigh Heritage Interpretation and Consultation

Mirvac has made an application to alter the Conditions of Consent concerning Condition E6. The Association argues there are a number of principles which must first be considered.

The Association in its primary submission made a number of points.

- The first went to the role of the IPC, dealing with applications before it, and ensuring in the public interest the community has the opportunity to comment on major issues such as the application of heritage interpretation to the Eveleigh Workshops. Our concerns were expressed in the following terms” *Thus there arises the curious situation of stage 1 in the HIP being determined in the earlier applications, SSD Applications for the redevelopment of the Workshops being made with heritage Interpretation a key component. However very little heritage material has been submitted by the applicant, particularly in the area of social and labour heritage nor has any analysis been undertaken by the Department in its Report, nor is the ability of the community to make their views known, nor has the IPC the opportunity to conduct an Independent Assessment of the Applicants stage 2 HIP, the most important component of heritage interpretation. This is not a transparent and accountable process being advocated by Mirvac. Mirvac has previously indicated that stage 2 interpretation would be finalised in late 2017 or early 2018.*”

The RTBU RMA asks the IPC to examine the SEARS Requirements to ascertain whether they have been complied with. See Acting CEO of Urban Growth correspondence to the Department of 16 June 2017 Re: Response to Request for Secretary’s Environmental Assessment Requirements, Australian Technology Park, Bays 1-5 Locomotive Workshops (SSD 8517). The letter refers to all of the Public Covenant documents will need to be considered in the Heritage analysis.

The Association argues that not only have these documents not been analysed there is little stage 2 heritage analysis in the Applicants Development Applications. The Public Positive Covenant is not mentioned in the Departments Assessment Report. The Association request the IPC in its Determination rectify this serious omission.

- Secondly, the processes for consultation on heritage interpretation. The occasional meeting that the Association has been invited to has been characterised by poor processes including lack of agenda, refusal to provide information, failure to provide minutes ,the failure to

respond to suggestions coming from key stakeholders . Evidence of these failures was set out in a number of emails provided to the IPC by the Association.

By way of contrast many of these process issues have been addressed in the ATP Community Consultation and Engagement Plan –December 2016. The Association makes the point the Community Liaison Group was established to deal with construction and associated activities. In order to improve the processes and principles on consultation with the aim of adopting international best practice the Association tendered a document **IAP2s Public Participation Spectrum** which analysed the suggested process for making decisions. On the left hand axis there are the headings public participation goal and promise to the public. The Association argues that the desirable point to be reached for the stage 2 HIP was a combination of “**Involve**” and “**Collaborate**”.

Involve includes a public participation goal and promise to the public. . The principles adopted refer to :*“work directly with the public, to partner with the public in each aspect of the decision including development of the alternatives and the identification of the preferred solution; we will work with you to ensure that you concerns and aspirations are directly reflected in the alternatives provided and provide feed back on how public input influences the decision; We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.”.*

The Association argues that a consultation plan for heritage interpretation be established that incorporates the principles referred to in the IAP2 s Public Participation Spectrum and the consultation plan process framework adopted for the Community Liaison Group.

- Thirdly, the structure for Heritage Interpretation consultation is fragmented and should be consolidated into one body. The Association in tis submission to IPC called for a Condition of Consent that established a Heritage Sub Panel consisting of a specialist moveable heritage person and also a specialist historian who is familiar with the intangible cultural heritage of the workshops , plus a representative from the Heritage Council and City Council of Sydney together with four stakeholder/community representatives with specialist knowledge in these areas.

Currently there appears to be 3 groups advising on heritage interpretation. One is the occasional, informal, non-responsive process which the Association has been involved with, the second is the Heritage Sub Panel established by Mirvac with no input from non-government stakeholders consisting of Mirvac, HC and CCS, These meetings are held frequently, behind closed doors and requests from the Association for a copy of the Heritage Sub Panel minutes have been refused by Mirvac. The Association is concerned about the government/local government agencies making decisions about intangible cultural heritage because our examination of the submissions made by these organisations to the Various DAs and Mirvac responses and the further response form these organisation reveals they have not made one comment on Intangible Cultural history. The Association makes a caveat that there has been a truckload load of documentation and we may have missed comments made by these organisations but our analysis is as referred to. The third group is the

Community Liaison Group who operates within terms of reference limited to construction and allied activities. It appears to be used by Mirvac for giving the company a green light on occasions in relation to heritage interpretation issues without having the background documentation or the benefits of the pros and cons of other stakeholder's positions. The Association is very supportive of the individual community members on the CLG. They make incredible personal sacrifices to protect and advance the interests of their community.

The Applicant seeks to alter condition E4 which requires the Stage 2 HIP to be prepared and submitted to the Planning Secretary prior to the issue of the first occupation certificate for the Locomotive Workshop. It also requires future development applications to be consistent with the Approved stage 2 HIP.

The Association opposes the Applicants proposed alteration. Fundamental principles in our view are being discarded as a consequence of this proposal. The Association in its submission to the IPC asked a fundamental question what is the role of the IPC in stage 2 interpretation. The Mirvac answer is none. This raises serious concerns for the Association and we made suggestions in our conditions of consent proposals as to how this may be ameliorated by the structuring of the consultation framework and outcomes, the right of the community to be involved and comment on the final stage 2 HIP; and the role of the Planning Secretary.

The Association argues this condition of consent goes for a trifecta, no role for the IPC, no role for the broader community and no role for the Department in being able to approve (or otherwise) the stage 2 HIP. This proposal must be rejected as it is not in the public interest.

A further matter of concern is proposal to change the word final to draft. It is a common experience for the difference between final and approved documents to be vast. For example there may be seven drafts. Which one is to be chosen? What happens if a DA goes ahead on the draft document and there are major changes? The Mirvac proposal concept is not in the public interest and must be rejected.

Public Perception of Institutions

The Association notes there are serious concerns within the community about the performance of the nation's institutions whether they are parliament, churches, political parties, the judiciary or the mediating institutions which are responsible for interpreting and implementing policy and legislation. These concerns are expressed in the media on almost a daily basis.

Various proposals for change to institutional frameworks emanate from organisations including political parties. One such suggestion for change involves the adoption of an Intangible Cultural Heritage Policy by the 2017 Annual Conference of the NSW Branch of the Australian Labour Party and this is referenced immediately below.

NSW ALP Intangible Cultural Heritage Policy: Conference Resolution

Labor notes

1. The various proposals for the development of the Eveleigh Railway Workshops Precinct with Australian Technology Park, Central to Eveleigh Corridor project including North Eveleigh and the Waterloo Station housing project. The privatisation of the ATP raises directly the future conservation of this national and internationally recognised heritage precinct, the recent fragmentation of heritage governance and the failure to implement various community developed and NSW Heritage Council endorsed plans for the precinct.
2. The heritage encompassed by the Eveleigh railway workshops precinct according to the NSW government *“are the best collection of Victorian period railway workshops in Australia and are considered to have world heritage significance ... they represent the pinnacle of manufacturing achievement in NSW ...”*
3. In addition to its buildings and machines the Eveleigh Railway precinct has irreplaceable social and cultural significance. The sites heritage is of central significance for our labour movement’s heritage and for our nation’s history of citizenship. The celebration of the 100th anniversary of the 1917 Great Strike underlines the fact that that the Eveleigh railway precinct has been the crucible for the forging of the NSW Labor movement.

One Eveleigh boilermaker, JST McGovern was at the helm in the formation of the Labor Party and the first Labour Premier of NSW. In total over 25 Labour politicians started their working lives at the Eveleigh Railway Workshops including 3 premiers of NSW (McGovern, McKell and Cahill and one Governor General).

4. That In July 2003 the Nizhny Tagil Charter for Industrial Heritage produced by the International Committee for the Conservation of Industrial Heritage noted that *“industrial heritage is of social value as part of the record of the lives of ordinary men and women and as such provides an important sense of identity. It is of technological and scientific value in the history of manufacturing, engineering, construction ... These values are intrinsic to the site itself, its fabric, components, machinery and setting, in the industrial landscape, in written documentation, and also in the intangible records, of industry contained in human memories and Customs.”*

That in 2003 UNESCO adopted **The Convention for the Safeguarding of Intangible Cultural Heritage** which was defined as *“ the practices, representations, expressions as well as the knowledge and skills that communities, groups and in some cases individuals recognises as part of their cultural heritage.”* Successive owners and managers within the Eveleigh railway precinct have only paid lip service to its intangible cultural heritage.

An incoming Labor Government shall:

1. Support the adoption of the 2003 UNESCO Convention for the Safeguarding of Intangible Cultural Heritage and for its incorporation into the next ALP National Platform and implementation by a Federal Labor Government.

2. Labor recognises the need to coordinate, conserve and preserve heritage across the Eveleigh railway precinct including Moveable and non-movable artefacts, archives, intangible cultural heritage in situ and to encourage community and stakeholder involvement and will investigate a way to do so.
3. Note the proposal for **The Working life, Aboriginal, Cultural and Community Arts Centre** within the Eveleigh Railway Precinct to develop and interpret the precincts intangible cultural heritage and will work with the community to examine the proposal.
4. Ensure that the heritage covenant accompanying the privatisation of the ATP site is implemented in full together with genuine community and stakeholder consultation at every stage.

Comprehensively review the NSW Heritage Act, 1977 and NSW Environmental Planning and Assessment Act, 1979 to ensure that all heritage, including intangible cultural heritage, are comprehensively addressed in strategic planning, rezoning, redevelopment applications and that the processes and decisions of the NSW Heritage Minister, Heritage Council and Heritage Division are public, transparent and provide for full stakeholder engagement

IPC Mirvac Hearing – RTBU RMA Comments on Issues Raised

The RTBU RMA is concerned how little attention is given in Mirvac's evidence to the Moveable Heritage Collection and Intangible Cultural Heritage. The excerpts below seem to be the sum of it. We have made some comments on these excerpts and other matters raised in the Applicant's submission.

Moveable Heritage Collection

P8 *"the heritage artefacts ...their predominately in bays 1 and 2 ...there is a distribution of them through the building p12 there is also opportunities for cafes and things in that café space"*

P33 *"were not talking to any tenants in bays 1 and 2. We sort of want to bed down bays to 3 to 4A first..."*

P54 *"We have done quite a lot of work on the look and feel and the experience of bays 1 and 2, again to start to draw upon the rich history of the site, incorporate sole pieces of removable heritage component"*

The RTBU RMA agrees with the observation that most of the MHC is housed in Bays 1 and 2 but what is the implication for the totality of the Eveleigh Collection, how will it be distributed throughout the retail and commercial bays, the concerns about the intactness of the Davy Press, the issue of assemblages, the interaction between heritage and retail and the amount of exhibition space remaining in Bays 1 and 2 are matters of concern for many organisations. These and other issues have been more extensively canvassed in our primary submission to the IPC.

Heritage Interpretation: P15 *"And then some ideas about the heritage interpretation itself on the upper level, again, to bring people into the space: reveal the stories, get educations use going through there; and bring some of the history to life. So these are fairly sketchy at the moment. There not –didn't form part of the primary submission but this is the work that has been done....so some of – all these concepts are in response to submission as well as have been taken through the City of*

Sydney and the Heritage Division, that subcommittee, looked at all these concepts as part of what we are doing provide feedback to allow us to tweak them”

P34 “we think is absolutely essential (that schools come to the site) because there’s so many opportunities about key themes, industrialism, workplace rights, aboriginal rights, aboriginal workers, and the iconic nature of the site,”

P54”Reference to Condition of Consent e6 that requires future development applications to be consistent with the approved stage 2 heritage interpretation plan...because without the word draft in there what will end up happening is we would have to really rush. We would have to rush doing the interpretation plan and we want to go through a whole process of community consultation, like we did with the public domain to get their stories. We want to develop it properly. This is not a piecemeal small little interpretation plan, this is a whole cultural tourism planning process. ...and we want to do eh community – we haven’t done community consultation on the state 2 interpretation plan for this yet , because we wanted to wait for the DA to come through so that we know what we are working with...”

P15” All the retailers these days are looking for that authentic experience , so this is –its proving to be an incredibly popular option for a number of quite well known retailers. So I think there is a lot of enthusiasm in the market for being involved in in a project of this nature”

The RTBU RMA seeks clarification about the amount of exhibition space on the mezzanine. In the response to submission this space was dramatically reduced and relocated to some extent downstairs. The Association requests that the IPC seek information on this matter and how the heritage space compares before and after the RtS.

As the RTBU RMA understands the educational space referred to is for commercial education. But the reference and the positive approach taken by the Applicant to school groups and the educational opportunities presented is a very positive statement and is supported by the RTBU RMA.

It is an idea that has been pursued by the community for a generation and at one stage work we believe was undertaken to produce history modules for use by schools. The RTBU RMA requests that the IPC in its Determination made a recommendation that a policy objective for the site include **“the provision of educational facilities through the display of the MHC and ICH, lectures, films, broadcasts, telecasts and other means”**

The RTBU RMA in this submission has outlined its reasons for opposing the variation to Condition of ConsentE6 and proposed a new Condition of Consent covering the Heritage Sub Panel. The RTBU RMA notes the SEARS requirement for these DAs appear not to have been met in full. They appears not to address the impact to moveable heritage items and in situ machinery and conservation and management measures to ensure protection of significant objects nor does it consider opportunities for heritage interpretation.

The RTBU notes the reference to stories and agrees that there are many wonderful stories to be told but argues that Heritage Interpretation covers a much wider canvas than stories.

The RTBU RMA brings to the attention of the IPC that the Associations request for a copy of the draft retail fit out for Bays 1 and 2 but Mirvac refusal to supply the requested material.

Blacksmith viability

p34”” *and you know his business, I wouldn’t say, is going okay, but I think you know with our help....”*
The RTBU RMA recommends that the veracity of this statement be checked by IPC with the owner of the blacksmithing operation. It is our understanding that in spite of Innovation Plaza being closed for many months that business is currently thriving.

The Loading Dock and Truck Numbers

p34”imited truck movements of the dock operation”. The RTBU RMA requests that the IPC, on behalf of the community, ask the Applicant to provide details about the number of truck movements into and out of the loading dock by time of day and night, size of vehicle and day of the week.

Heritage Tourism

P12 tourism heritage experience *“and it’s really part of a fantastic kind of heritage tourism experience.”*

The RTBU RMA has requested in its primary submission to IPC that a Condition of Consent be included about heritage tourism. It has been kicking around in the community for a generation and is referred to in the CMP. Unfortunately, it was not covered in detail in the MacroPlanDimasi Economic Impact Assessment Report. The report said *“increasingly tourists –particularly those visiting Australia, travel for food based experiences and will seek out attractions across Sydney.”*

Other Matters. One of the conditions of consent sought relates to the upgrading of the CMP. The Association requests that the community be given the opportunity to participate in the process and comment on draft documents before they are signed off. The community has been involved in the production of this document and its predecessor documents for thirty years and this practice should continue.

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