

Sandstone precinct

1. I have been a resident of The Astor on Macquarie Street for 25 years. My concerns are about the cumulative adverse impacts of nearby developments on the amenity of my home and neighbourhood. There are several issues that the EIS does not satisfactorily resolve.

Sandstone precinct name

2. I object to the use of the term “sandstone precinct”, which has no history of use. This EIS is about two separate buildings separated by a street. All they have in common is government ownership and construction material. Introducing the term “sandstone precinct” implies that the two buildings should be joined together and managed as a single building. I do not accept that this is so; a case for it has to be made.

Shadows

3. The shadow diagrams show that the additional floors on the Education Building would cause more of Farrer Place to be in shadow at the equinoxes. As sunlight access is already poor, an increase in shadows in Farrer Place (particularly at the equinoxes) is not acceptable.
4. Sun access to the facades of sandstone buildings is also important. The additional floors on the Education Building would reduce the sunshine on the facades of the Lands Department building. The EIS has not comment on this.

Rail corridor

5. The SEARs called for more information on the rail corridor. That the rail tunnel would be 60m below the site does not dispose of the issue of whether or not subterranean works at this site would constrain the design of the railway. Suppose it is desired to build a station at this location. Now on the St Petersburg metro, Admiralteyskaya station is 105m below surface, so a depth of 60m does not preclude a station here, and the site is one of the few in government ownership along the route.
6. The failure of the government to improve public transport capacity in the city centre in step with the increase in floor space has been destructive of the amenity of residents at The Astor, where I live. We want this railway, and we want a station nearby.

Change of use

7. The heritage consultants appear not to have assessed the change of use in the proper manner. The Burra Charter sets out the process very clearly:
8. The policy should identify a use or combination of uses or constraints on uses that retain the cultural significance of the place. New use of a place should involve minimal change, to significant fabric and use; should respect associations and meanings; and where appropriate should provide for continuation of practices which contribute to the cultural significance of the place.
9. Graham Brooks and Associates have considered the *practicalities* of alternative uses. It is therefore surely not beyond their wit (especially having regard to Graham’s exceptional capabilities as stated in the documents) to go on to explain how the proposed use can best “respect associations and meanings”, and provide for “continuation of practices which contribute to the cultural significance of the place”. I feel it is a matter for the owner and the

owner's consultants to make proposals. Even if the proposed uses are indeed the best way forward, we still have to do it properly!

Activation

10. According to the exhibition documents, the proposals will lead to:

.....increased street activation and revitalisation of the northern end of Sydney CBD which will greatly strengthen the City's role in the global economy. This will encourage a range of new opportunities for workers, visitors and the wider community in a centrally located, highly accessible part of the CBD.

11. The EIS fails to explain why the northern end of the CBD needs "revitalisation". I have lived in the northern end of the CBD for 25 years, and I have not observed any need for revitalisation.

12. The EIS fails to explain how the proposal will increase "street activation". It does not explain what it means by "street activation". The Sydney Local Environmental plan contains the following definition:

Active Frontage means street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. Frequent building entries that face and open towards the street, transparent street frontages, quality materials and refined details, and mixed land uses will make streets more diverse and attractive for pedestrians and increase the perception of safety and encourage higher levels of pedestrian activity.

13. However, there are no proposals for creating additional building entries or modifying the heritage façade.

14. Moreover, it is not credible that the proposal will "greatly strengthen the City's role in the global economy", and the EIS does not quantify the boost in the city's Gross Domestic Product or explain the mechanism by which this economic miracle will occur. If there really is a simple, straightforward way to "greatly strengthen the City's role in the global economy" many people would love to know what it is.

Conservation Management Plan

15. The SEARs called for updated CMPs for the two buildings. The applicant has not provided these documents for the exhibition and public. These are documents of fundamental importance. Even if I am prepared to accept the proposed new uses, I first want to see how the applicant proposes to manage the changes, and what safeguards there will be for the heritage impacts.

Subterranean works

16. There is no consideration of whether the subterranean spaces under the streets and Farrer Place might be required for public utilities in the future. Sydney Council has previously exhibited proposals for vacuum solid waste collection and new energy distribution systems (trigeneration). Sydney Council should not be surrendering parts of the public domain unless there is a tangible public benefit (for example, connection to a station). The exhibition documents do not identify a public benefit and they do not provide any assurance that there will be no future public requirement for the space under the streets and Farrer Place.

Community consultation

17. The exhibition documents do not comply with the SEARs. In particular, there has been no consultation with community groups and affected landowners (for example, the Owners

Corporation Network, AMP Capital). There are several residential buildings nearby (and new residential buildings are proposed); issues of concern to local residents include late night trading, sunshine access, traffic congestion, and demand for visitor parking (which is extremely limited in this part of the CBD).

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