

SSD 15_7317
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

29 February 2016

**Submission to Australian Technology Park EIS;
Application Number SSD 15_7317**

I strongly object to the Australian Technology Park (ATP) redevelopment, Application Number SSD 15_7317. As discussed below, the proposal will cause significant and unacceptable environmental impacts. The project must be rejected and should not be approved.

Objection: Failure to identify and address cumulative impacts of this proposal with other development within the Alexandria, Erskineville and surrounding areas. Therefore the EIS fails Secretary's Environmental Assessment Requirements, specifically "*consideration of potential cumulative impacts due to other development in the vicinity*".

When assessed considering other development within the Alexandria, Erskineville and surrounding areas, this proposal has significant cumulative impacts (including, but not limited to, excessive population growth, demand on infrastructure and public services, traffic volumes and congestion and development that is not ecologically sustainable development). This area lacks the required essential infrastructure and services to support such a significant population growth. The Proposal fails to identify, assess and account for these cumulative impacts.

The cumulative impact of this proposal has not been adequately considered or assessed. The proposal fails to consider and account for other nearby development activities and the combined cumulative impact. Examples of significant (large high rise) development either in progress, recently approved or planned for the near future include (but are not limited too):

Specifically, examples of significant development either in progress, recently approved or planned for the near future include (but are not limited too):

- Ashmore Precinct, including Application Reference Number D/2015/966 currently under consideration by Council.
- WestConnex by the NSW State Government (Environmental Impact Statement exhibition of the proposal closed on 29/01/2016; http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6788)

- Green Square development
- Sydney Metro Waterloo train station and associated development (by NSW Government). Both the Waterloo site and proposed new underground train route are of relevance at the 71-91 Euston Road location.
- Central to Eveleigh rail corridor development by the NSW State Government
- 256-262 Mitchell Road, Alexandria NSW 2015 (DA Reference Number D/2015/1286; currently being considered by Council)
- 71-91 Euston Road, Alexandria. (DA Reference Number D/2014/1992)
- 142-144 Lawrence Street, Alexandria NSW 2015 (DA Reference Number D/2015/1725; currently being considered by Council)
- Corner Mitchell Road and Fountain Street, Erskineville/Alexandria
- 33-49 Euston Road Alexandria
- Alice Street, Newtown
- Sydney Park Road, St Peters

All these developments are likely to be in construction phase during the construction of Australian Technology Park. The Australian Technology Park EIS fails to identify and assess cumulative impacts of the proposal with such development listed above for both during construction and post-construction after construction. All these developments listed above influence and add to the cumulative impact of Australian Technology Park during operation.

The combined population growth of these nearby significant developments will intensify and exacerbate the impacts of this proposal on the local community. When assessed considering other development within the Alexandria, Erskineville and surrounding areas, this proposal has significant cumulative impacts (including, but not limited to, excessive population growth within this locality, demand on infrastructure and public services, traffic volumes and congestion and development that is not ecologically sustainable development).

The proposal will increase the traffic volumes and alter road conditions for example, at intersection of Henderson Road and Mitchell Road) but fails to assess and provide for development that significantly populates an area and the necessary roadway infrastructure and services to support the proposal.

The proposal fails to adequately plan and provide for the roadway infrastructure required to support the proposal. The proposal fails to identify, assess and provide for roadway impacts beyond the Henderson Road intersection with Mitchell Road. Mitchell Road is currently significantly congested and cannot physically support the traffic volume expected under the proposal and including when combined with the other development in the area. The proposal will lead to enormously significant impacts on the local community as a result of traffic congestion that spreads throughout interconnected, local roadways.

Changes to local roadways within Alexandria will significantly increase traffic problems by increasing traffic volumes, congestion and parking pressures and

making it difficult to travel along local roadways. The Australian Technology Park EIS and design fails to identify, assess and incorporated the changes to roadways proposed by these developments. For example, Ashmore Precinct development proposes to make significant changes to Mitchell Road including installing several traffic lights and reducing parking availability. As a result of the Westconnex development, Euston Road is expected to receive over 60,000 vehicles per day. WEstconnex proposal relies on traffic dispersing from Euston road using existing local roads. Given the these local road such as Euston Road and surrounding interconnected roads lack the capacity and infrastructure to support the traffic volumes expected, when these combined impact of changes from other developments are implemented along with the roadway changes, the Australian Technology Park will have enormous cumulative impacts will occur to the community.

Local roadways will become extremely congested and inefficient. Local residents will have significant trouble traveling around local roads due to significant roadways restrictions such as no right hand turns from Mitchel Road into Sydney Park Road.

The combined population growth with other nearby developments will lead to increased demand on services including, but not limited to, Primary Schools, High Schools, child care, community health services, trains, buses, recreational facilities, sporting grounds and open space areas. The local area lacks the required essential infrastructure and services to support such a significant population growth. Services and infrastructure in these areas are already struggling to cope with the demand from the existing population. Infrastructure and services to support the additional population growth must be available prior to development.

The EIS and construction environmental management plan fails to address the significant impact on the local community of simultaneous large construction projects all occurring at the same time or within short duration of each other. This cumulative impacts will be a significant impact on the community. The multiple construction projects of significant scale will increase and exacerbate impacts such as (but not limited to) noise and traffic impacts on the local community.

The above discussed changes will significantly negative impact on the community and residential areas, especially on Huntley, Belmont and Lawrence Streets and Mitchell Road, through increased traffic volumes, traffic noise, traffic congestion and road changes to accommodate the proposal. These impacts are significant and unacceptable. Therefore, ATP proposal does not meet community expectation or public interest.

Objection to traffic related impacts. Failures of the EIS Transport, Traffic and Access environmental assessment.

The EIS Section 5.8 and the supporting document *Australian Technology Park Redevelopment Transport Impact Assessment* fail to identify, plan and assess the following

- Impact of the Westconnex project by NSW Government (Environmental Impact Statement exhibition of the proposal closed on 29/01/2016; http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6788). The Westconnex development EIS forecasts Euston Road will receive over 60,000 vehicles per day. The Westconnex proposal relies on traffic dispersing from Euston road using existing local roads. The Westconnex proposal makes numerous changes to local roadways including Mitchell Road, Euston Road, Sydney Park Road and Maddox street. All these Westconnex impacts influence the Transport, Traffic and Access impacts of Australian Technology Park during operation.

This demonstrates a failure against Secretary's Environmental Assessment Requirements, specifically "*how the development will support Government strategies in promoting sustainable travel choices, for its future staff and visitors*"

- Impact of the Ashmore Precinct Development provided for in the *Sydney Local Environmental Plan 2012* and *Sydney Development Control Plan 2012*. For example, Ashmore Precinct development proposes to make significant changes to Mitchell Road including installing several traffic lights and reducing parking availability.
- The Traffic Capacity Analysis assessment is flawed as the data did not account for other development and road performance changes such as the influence of Westconnex, Ashmore Precinct and cumulative impacts of other development discuss above. For example, the Westconnex EIS predicts that Euston Road is expected to receive over 60,000 vehicles per day but traffic is expected to disperse via local roadways including Mitchell Road. The EIS assessment is incorrect and flawed by not incorporating these aspects. The EIS conclusions regarding the future (predicted) levels of service criteria for roadways and intersections are therefore incorrect and misleading as they do not identify and assess performance once other development either in progress, recently approved or planned for the near future is completed.
- Impact of the proposed retail Supermarket. The EIS Section 3.7.3 state the EIS seeks approval for a supermarket to operate 24 hours per day for seven days per week. The EIS Section 5.8 and Traffic Impact Assessment Report fail to identify and assess the vehicle trips generated, traffic impacts and parking needs specifically related to a supermarket operating 24hours per day. A supermarket operating these hours is likely to generate significant vehicle movements including through night time periods. It will also require significant parking to support the supermarket and the EIS fails to assess this aspect. The failure to assess the supermarket related traffic impacts demonstrates a failure against Secretary's Environmental Assessment Requirements, specifically "*how the development will support Government*

strategies in promoting sustainable travel choices, for its future staff and visitors”.

- The EIS assessment lacks a rigorous, scientifically defensible method of assessing and predicting parking requirements. The traffic assessment makes predictions about traffic related impacts and trip generations based on figures derived from percentage of car parking spaces currently utilized. It is incorrect to assume that parking rates will be equivalent under the proposal compared to existing. The proposal will increase the site population immensely and parking behavior and demand under the existing site should not be assumed be the same under the proposal. Therefore, the assessment lacks a rigorous, scientifically defensible method of assessing and predicting parking requirements.
- Regarding *Australian Technology Park Redevelopment Transport Impact Assessment* Section 6.1.1, relies on the argument that just because the number of parking spaces provided is less than maximum allowed does not mean the EIS has adequately provided enough parking and that public transport will be encouraged. The EIS fails to assess impact to local roadways in Alexandria and Erskineville from increased parking pressure.

Objection to changes to Davy Road (Henderson Road at intersection with Mitchell Road).

Australian Technology Park Redevelopment Transport Impact Assessment Section 5.5.3 states

“Mirvac proposes to convert the kerbside lanes on both sides of Davy Road to provide on-street parking spaces to support the future retail amenity of the precinct. This would effectively reduce the number of arrival lanes (into the Henderson Road intersection) from three to two, and the number of departure lanes from two to one. The conversion of the kerbside lane into a parking lane would effectively result in the continuous left turn lane (at the Henderson Road intersection) reducing to a short 50m left turn lane, while the other two lanes would continue to be a continuous through lane and short 40m right turn lane.”

I object to the proposal to roadway changes at changes to Davy Road. SA stated above, the EIS fails to identify and assess the impact other development (eg. Westconnex, Ashmore Precinct) and subsequent cumulative impacts including significant population growth, increases in traffic volumes and changes to local roadways including Mitchell Road. For example, the Westconnex EIS predicts that Euston Road is expected to receive over 60,000 vehicles per day but traffic is expected to disperse via local roadways including Mitchell Road.

Given the Traffic assessment did not consider these planned changes and cumulative impacts, the claim in the Section 5.5.3 Traffic Impact Assessment document that *“The analysis indicates that the proposed changes to Davy Road would have no impact to the traffic performance of the Henderson Road intersection”*. Is false and misleading as the analysis failed to include and assess important, known information. The sensitivity test is also flawed as the data did

not account for other development and road performance changes such as the influence of Westconnex.

The loss of roadway under the ATP EIS proposal will be a significant loss of roadway lanes and significantly impact traffic movement efficiency. When assessed considering other development proposal and expected traffic volumes, the changes to Davy Road (Henderson Road at intersection with Mitchell Road) will significantly impact traffic efficiency and lead to unacceptable impacts. Therefore the proposal should be rejected.

Objection: Excessive bulk, scale, size and density of development. Negative impacts to surrounding residential areas. Negative impacts to visual skyline, particularly views from Alexandria and Erskineville.

The proposed buildings are excessively large in bulk, scale, size and population density supported. It causes a significant visual impact on the amenity and skyline. The proposal significantly contrasts and conflicts with the surrounding residential areas, particularly areas of Alexandria and Erskineville south of the ATP subject site. These localities are within the Kingsclear Road, Alexandria/Erskineville Heritage Conservation Area (listed under the *Sydney Environmental Plan 2012*). Most of the surrounding land uses are single or double storey terraces. The proposal significantly conflicts and impacts the visual, amenity and scenic heritage values associated with the heritage conservation area. The development significantly populates an area that lacks the essential infrastructure, services and environment to support the development.

The significance of the visual, bulk, height and scale impacts is strongly illustrated by the *View Impact Study* section and drawings within the document “*Australian Technology Park Design Report for State Significant Development Application*” whereby the proposal dominates the streetscape, skyline and visual character of the area. The proposal significantly contrasts the location, form and height of the existing adjoining and nearby residential buildings. The proposal height is excessive compared to surrounding buildings.

The proposal is not sympathetic to the surrounding residential area dominated by residential terrace style development.

The proposal has negative impacts to visual skyline and aesthetic views, particularly of the skyline views from Alexandria and Erskineville to the North (towards the City). The development and height of the new buildings will be an ugly eyesore that intrudes, reduces and blocks the aesthetic views of the skyline. The scenic views of the skyline from Alexandria / Erskineville are of significant value to the local community. Therefore the Australian Technology Park proposal is unacceptable and should be rejected.

Objection: Building referred to as Building 1 exceeds the maximum building height under the *State Environmental Planning Policy Major Development*.

As discussed in the EIS 5.5.3 Height, Bulk and Scale, the Building referred to as

Building 1 breeches exceeds the maximum building height under the *State Environmental Planning Policy (Major Development)*. I object to any building exceeding the legally allowed maximum allowed heights prescribed. It is in the Public interest that proposal must achieve the design standards and suitability within the constraints and limitations set by the legislation, including the *State Environmental Planning Policy (Major Development)*.

Objection: The proposal exceeds the maximum GFA allowed under the *State Environmental Planning Policy Major Development*.

As discussed in the EIS 5.6 the ATP proposed development includes two of three buildings which will exceed the GFA allocation identified under the *State Environmental Planning Policy Major Development*. In addition, the total combined GFA for the three sites will also result in an exceedance of the total allowable under the *State Environmental Planning Policy (Major Development)*.

I object to any building exceeding the legally allowed maximum allowed GFA prescribed. It is in the Public interest that proposal must achieve design standards and suitability within the constraints and limitations set by the legislation, including the *State Environmental Planning Policy (Major Development)*.

Objection: Significant impact to a heritage conservation area.

The proposal is located immediately adjacent the Kingsclear Road, Alexandria/Erskineville Heritage Conservation Area (listed under the Sydney Environmental Plan 2012).

The ATP proposal is not sympathetic to the Kingsclear Road Heritage Conservation Area values and is not sympathetic to the surrounding residential area dominated by residential terrace style development. Whilst the ATP is an existing site with buildings the new development will significant increase, amplify and exacerbate the impacts on the heritage values, specifically in terms of bulk, scale and height. As noted above the visual, bulk, height and scale impacts are clearly evident in the EIS document “Australian Technology Park Design Report for State Significant Development Application” whereby the proposal dominates and conflicts with the streetscape, skyline and visual character of the area.

Objection: Significant overshadowing by the ATP proposal on surrounding residential properties.

There is significant overshadowing by the proposal on surrounding residential properties, particularly numerous residential properties, particularly those located along Henderson Road. The overshadowing will significant impact on the private open space and living space of multiple residential properties. This is a consequence of the excessive height, bulk and scale of the development. It will significantly impact the quality of living for these residences. I reiterate that is area is located within Heritage Conservation Area and therefore the overshadowing significantly impacts the Heritage

values of this heritage area.

Objection to the inclusion of Supermarket. Objection to proposed supermarket operating hours of 24 hours per day, seven days per week.

I object to the inclusion of Supermarket with operating hours of 24 hours per day, seven days per week. These operational hours are excessive.

The EIS Section 5.8 and Traffic Impact Assessment Report fail to identify and assess the vehicle trips generated, traffic impacts and parking needs specifically related to a supermarket operating 24 hours per day. Vehicle trips are generated by customers and delivery trucks and will impact local roadways. A supermarket operating these hours is likely to generate significant vehicle movements including throughout the night time periods. It will also require significant parking to support the supermarket and the EIS fails to assess this aspect and the supermarket parking demands. The EIS fails to identify, analyse and assess important aspects and impacts likely impacts required to verify the suitability and appropriateness of the ATP design and proposal.

The EIS fails to identify, assess and justify that demand for a retail supermarket at the site or demand for a supermarket operating 24 hours per day, seven days per week. For example, there is no supporting “commercial viability assessment report” to provide evidence that a retail supermarket of the operational size, scale and hours is appropriate and supportable.

The EIS fails to identify that a large supermarket is planned for the nearby Ashmore Precinct (refer to the *Sydney Local Environmental Plan 2012* and *Sydney Development Control Plan 2012* and Development Application Reference Number D/2015/966 currently under consideration by City of Sydney Council. In addition there is also a supermarket currently in construction at Fountain Street, Alexandria. An existing Supermarket is located in Erskineville. Therefore, a large size supermarket operating 24 hours per day, seven days a week is not supportable.

Conclusion:

The Australian Technology Park proposal and EIS demonstrated that the proposal will cause significant and unacceptable environmental impacts. The project must be rejected and should not be approved.

I do not consent to my name and contact details being made available to the public. If submissions are to be made publicly available, please remove all of my personal details from this letter.