

Alexandria Residents Action Group (ARAG) strongly objects to this proposal.

The claimed benefits for the State - development of the ATP and an increase in jobs on the site - are not net benefits for the State because they are not new jobs - they are a transfer of existing jobs from other sites. If anything, this transfer of jobs is a disbenefit for the State because it aggravates the existing imbalance between jobs being disproportionately in and around the CBD while the demographic heart of Sydney is now in Western Sydney, where the bulk of these jobs are coming from. This concentration of jobs in the centre of Sydney is counter to the Government's 'Plan for Growing Sydney's stated ambition to “support more jobs closer to where people live.”

It is claimed that without this development, the "significant benefits in creating a substantial new employment generators ... would not materialise". This is manifestly false in two ways. Firstly, this is not new employment, this is simply relocated employment. Secondly, this was not the only proposal for the site. The Atlassian proposal would also have seen employment generated at the site - and new employment, not simply employment relocated from elsewhere in Australia.

The claimed benefits for the proponent are also grossly overstated.

It is claimed that the site is unique in its capacity to facilitate a commercial campus style redevelopment.

A simple web search shows that there are, at this instant, thousands square meters of business space available for rent at Homebush, not to mention potential development sites such as, for example, 1-15 Wentworth Road North, a 2.4 acre site "within walking distance of Olympic Park", offered for vacant possession.

The supposedly unique features of this development are not greatly different from those that were claimed for the CBA's current Homebush facility in 2005:

The new facility will:

- [be] a state of the art multi purpose facility
- consolidate the Bank's existing business continuity arrangements into a purpose built site. This will provide seamless banking and financial services to the Bank's customers should a disruptive event occur;
- bring together the Bank's Sydney based Direct Banking Call centres: and
- incorporate an advanced learning and development centre for Bank staff.
- [provide] excellent surrounding amenities including a dedicated public transport service and is central for many of the Bank's staff. The new facility will provide a workplace setting with very high standards of environmental sustainability, smart technology and a flexible design that will meet customer, employee and business needs.

The claimed benefits for the local area are also overstated. The promised childcare centres will be largely if not totally dominated by CBA staff. The 'improved access' to the site and site upgrades will only benefit users of the site. Residents who currently use the site to access Redfern Station will see no improvement, and probably some degradation because of increased congestion.

Improved access to Redfern station is of marginal value, if improvements are not made to Redfern Station, which is already over capacity in terms of platform crowding. In particular, improved disabled access to Redfern Station is of extremely marginal value, given that 10 of 12 platforms at Redfern have no disabled access. Furthermore, train loads already average 130% during the morning peak and regularly reach 158% to 167%. The quantum of extra traffic generated by this proposal, and the likely impact on Redfern Station should be properly addressed, as part of a less perfunctory response to the NSW Long Term Transport Master Plan.

It should also be noted that Appendix F claims that “all intersections surrounding the ATP site operate efficiently without any capacity stress”. This is incorrect. Several nearby intersections suffer badly from capacity stress, including Boundary and Wyndham, which with current traffic volumes is already sufficiently congested that it causes traffic to bank back into Garden St, and even into the ATP, during the PM peak. The Henderson Rd and Garden St intersection is not much better, if any.

The traffic study must be expanded beyond intersections with roads into the ATP to include intersections that are heavily impacted by or impact upon ATP traffic, including at a minimum Boundary and Wyndham, Henderson and Garden, and Henderson and Wyndham.

The GTA Consultants' assessment that the ATP generates between 415vph and 586vph is based on the assumption that vehicular travel to the ATP is contained on-site. It is not. A large percentage of commuters to the ATP park in the suburban streets surrounding the ATP. Many of them move their cars several times a day in order to comply with parking restrictions. The contention that the increase in vph will be only be 50% because of the constraints of on-site parking is beyond naive. An approximate tripling in population of the ATP will generate far more than a 50% uplift - even if the constraints of on-site parking mean that the bulk of the increase manifests in off-site parking.

Moreover, it is not just Redfern station that is over capacity – the trains that pass to and from Redfern station also do not have the necessary spare capacity to accommodate the additional ATP workers. This has not been factored in to the EIS. It needs to be.

The SEARS states that the EIS 'must include adequate baseline data'. This requirement has not been met by the current EIS, either with regard to transport or traffic data. We formally request that a proper traffic study be conducted, considering both on-site and off-site parking. Further, the study should address the impact of other nearby infill development, including Ashmore Estate, Green Square, Waterloo Estate and other Central to Eveleigh developments, and the increase in through traffic that WestConnex will generate on Euston and Mitchell Roads. Concurrent developments also

need to be factored in to plans for the construction period.

Further, we have been told that CBA have not conducted a Travel Survey of their current workforce. If this is true, then such a survey must be conducted as a priority, as this is a vital input into planning travel needs.

Transport for NSW Traffic Surveys suggest that the majority of workers at Homebush live in Western Sydney, and drive to work, for lack of access to public transport or for other reasons. There is no reason to believe that CBA staff are different in this respect, and as such, this proposal runs counter to the State Plan objective of having jobs "closer to where people live". Instead, this proposal increases the overall quantum of commuting required, and on some of the most congested parts of the public and private transport networks. This is a significant disbenefit, which should have been acknowledged in the EIS.

The SEARs requires that the EIS shall “demonstrate how the proposed buildings will achieve design excellence in accordance with the general urban design principles of the Redfern Waterloo Built Environment Plan (Stage One) August 2006”. The EIS, Table 8, Subclause 22, claims compliance because the firms engaged “are well respected and have a history of achieving design excellence”. This assertion, despite being made without supporting evidence, may well be correct, but it does not demonstrate that this particular project achieves design excellence and it does not meet the SEARs requirement to address “the general urban design principles of the Redfern Waterloo Built Environment Plan (Stage One) August 2006”.

The proponent must be required to address this oversight, in line with the SEARs.

The EIS notes that the Vice-Chancellors Oval is being considered as a potential site for stockpiling material. The Vice-Chancellors Oval is a flood catchment and retention device, and as such, is unsuitable for use as a site for stockpiling material. Overall, the impact on the local residential area during the construction period has not been sufficiently addressed.

The EIS does not acknowledge many the negative impacts on traffic and transport in the area: in particular, increased congestion on local roads, increased congestion at Redfern Station, and increased competition for local parking.

In addition, the EIS does not meet the SEARS requirement to 'ensure the proposal does not create unacceptable environmental impacts'. The EIS makes clear that there are harmful but avoidable environmental impacts on local residents, in particular:

1) *loss of privacy*: modifications to Building 1 need to be made, because the current design, which proposes a glass facade overlooking Henderson Rd, will allow workers in the building to see into local residences. At the very least, screening needs to be installed on the south side of the building, as has been done in the case of the NICTA building.

2) *shadowing and loss of solar access*: The shadowing proposed is excessive - even without considering rooftop plant and equipment - and it is unnecessary. It could be avoided by reducing the size of Building 1, or by reallocating some of the bulk of the building further north. Seeking to equate shadowing caused by a building with shadowing caused by trees is inappropriate; the effects are quite different, as is impact on visual amenity.

3) *light pollution*: The existing Media City Building already causes significant light pollution on residential properties. These new buildings will be much closer to residential areas (south of Henderson Rd and in Garden St), and should be far more constrained in office lighting and illuminated signage. Illuminated signage should have limitations on brightness and hours of operation where signage will impacting residential areas. Of even greater concern is the pollution from lights emanating from within the office areas. The light pollution is even more of a concern given the 24/7 nature of the operations in the building. Lighting should be constructed so that it is directed inwards, away from windows, and glass should be chosen to restrict light pollution.

The proposed Buildings 1 and 2 are acknowledged to be over height and over size. The claim that the buildings need to be exactly this size to meet the CBA's requirements is unsupportable and unsupported. As Appendix D notes, the space is desired “to provide sufficient floor space to meet anticipated development needs”, not current needs, and the existing planning controls have “a jobs aim of between 5,000 to 8,000”, a target which would comfortably be met with the allowable FSA and height restrictions. Further, companies change in size constantly - a building that is exactly the right size this year, will inevitably be too big or too small by the following year.

These restrictions were known to the developer and the tenant when the ATP was sold. Reducing the size of Buildings 1 and 2 in line with the approved FSA would not be a hardship, and especially so there is scope for the Community Building to be larger, and as it is expected that the continuing development of the Central to Eveleigh corridor will create future opportunities for CBA to expand, if it proves necessary, and also in that some of the indicated uses of Building 1 are not what would be traditionally considered core functions in the banking industry, such as the 'Wellness Facility'. The justifications for exceeding the FSA and height restrictions do not withstand scrutiny.

The applicant's objection to these restrictions should be rejected.

The interaction of the commercial zone with the adjacent low density residential area has not been adequately addressed, which is required by the SEARs. There is insufficient setback given the proximity to residential areas so we ask that the design be altered to give it proper consideration. Building 1 should be reduced in size by stepping back the top floor or floors from the southern boundary. This would reduce overshadowing, which is currently at levels that cannot be considered accepted. Stepping back the top floor or floors could also create trafficable balconies, if desired.

The proposed materials palette is unsympathetic to the heritage area. We ask that a more sympathetic palette should be created, keeping in mind the guidelines provided in

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0018/119511/ApprovedHeritageDCP20

The size of the building will block visibility of the heritage part of the site from the South. The scale and unrelenting bulk of the buildings are disproportionate to the site. This damages the irreplaceable value of the site's heritage, which is the right of current and future generations of the State to enjoy.

The EIS claims that “the proposed buildings do not significantly impede any iconic views or outlooks within the locality”. This is false. A selection of viewpoints are provided in the EIS, in support of the claim, including a view north-west from Henderson Road, looking towards the Media City Building, a view west from Cornwallis, looking towards the Media City Building, and a view East from Rowley St, looking at the Media City Building. It is true that the Media City Building cannot be described as an iconic outlook. However, Media City is not the only building in the ATP, although it is possibly the only one to which the new buildings will compare favourably.

What the EIS does not acknowledge is that Building 2, and to a lesser degree Building 1, will block views of the Eveleigh Rail Sheds, which are indeed iconic. The current view can accurately be described as panoramic. Viewed from Central Avenue, the view stretches from Shed 1 to Shed 15. Even from Henderson Road, the view stretches from Shed 15 to Shed 7. All this will be lost.



Illustration 1: Iconic view of rail sheds looking northeast from Davey St and Central Avenue.



Illustration 2: Iconic view of rail sheds looking north from Central Avenue.



Illustration 3: Iconic view of rail sheds looking northwest from Central Avenue.

From Davey St, only Sheds 14 and 15 will be visible, as shown below. Elsewhere, the view will be completely lost behind Building 2. The SEARS requires "view analysis to and from the site from key vantage – points and streetscape impacts". Such a deliberately selective, limited, unrepresentative and misleading sample of the vantage points does not meet the letter or spirit of the SEARS, and deserves condemnation for treating the process with more than a degree of contempt. It raises the question of which other aspects of the applicant's response are similarly incomplete.

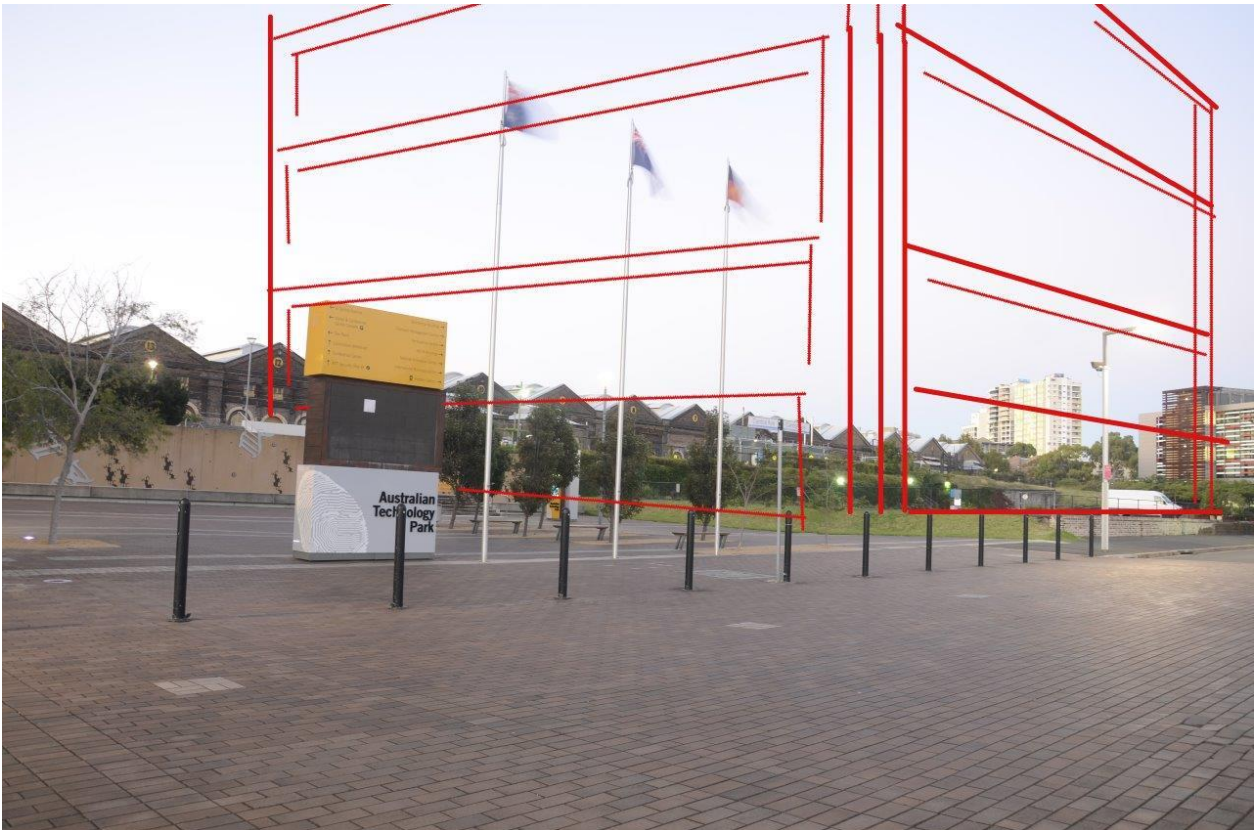


Illustration 4: From Davey St, only Sheds 14 and 15 will be visible

At the interface between Building 1 and the Rail Sheds, the EIS fails to analyse and provide “detailed justification for the proposed building height in the context of adjoining developments”. It does not consider “the relationships and interface with existing buildings, public domain and street network”. These are non-optional requirements placed on the EIS by the SEARS. They need to be addressed before the EIS can properly be considered to meet the SEARS.

The claimed net benefits to the area, to the State and to the applicant are overstated. The disbenefits are understated. While the applicant undoubtedly has a right to develop the site, there is no justification for exceeding the allowable envelope or for overshadowing, there are significant questions over how the site's future employees will access the site that need to be resolved, and there are opportunities to make the building more sympathetic in palette and composition to the heritage area it is in.

The EIS is long and complex, and the affect community was not given sufficient time to respond to

it, given that most residents only received notification 2 weeks after the opening of the EIS period. Insufficient hard copies of the EIS were available, making it difficult to assess the shadow diagrams and to ensure the participation of residents without access to the internet. We believe that consultation has not been sufficient, making the EIS non-compliant with the SEARS.

Given the multiple and serious problems with the design, we ask that The Department of Planning organise a meeting with the affected residents of Alexandria as a matter of urgency. The current EIS is clearly insufficient, does not meet the SEARs, and given the multiplicity and severity of its shortcomings, it is appropriate that the proponent be asked to resubmit it, this time addressing the issues properly, as required by NSW legislation.