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We strongly object to this proposal.

The claimed benefits for the State – namely development of the Australian Technology Park as a technology and innovation hub and to increase in jobs on the site – are not net benefits for the State because these are not new jobs; they are not technology or innovation jobs, and they transfer existing jobs from other sites in Sydney.

If anything, this transfer of jobs is detrimental to the State because it aggravates the existing imbalance between jobs disproportionately in and around the CBD while the demographic heart of Sydney is now in Western Sydney, where the bulk of these jobs are being transferred 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 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.

An alternate proposal such as the one from Atlassian would also have seen employment generated at the site – and new technology-focussed and innovation-based employment, not simply employment relocated from elsewhere in Australia.

Proponents of the development cite the new tenants as being technology powerhouses – using the term 'FinTech' to support their view.

But 'FinTech', or Financial Technology, was behind the development of financial products such as the sub-prime mortgages that gave rise to the Global Financial Crisis.

'FinTech' does not bring new and innovative technologies such as robotics, digital signal processing, mechatronics and biomedical engineering to the Australian Technology Park, geographically located as it is so close to established centres of learning such as the University of Sydney, the University of Technology Sydney and the University of New South Wales.

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 point in time, thousands of square meters of business space available for rent at Homebush, not to mention potential development sites such as 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;*
- *incorporate an advanced learning and development centre for Bank staff, and*
- *offer excellent surrounding amenities including a dedicated public transport service that 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 also are overstated.

The promised childcare centres will be largely, if not totally, dominated by CBA staff.

The 'improved access' to the site 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 due to increased congestion. Improved access to Redfern station is of marginal value, if improvements are not urgently made to the station, which is already over capacity in terms of platform crowding.

We have no indication from Transport for NSW as to when the urgently-needed improvements to Redfern Station will commence. We have not even seen preliminary proposals for improvements to Redfern Station.

In particular, current disabled access to Redfern Station is of extremely poor quality, given that 10 of 12 platforms at Redfern have no disabled access. Only one platform finger (two platforms) is serviced by a lift to the station concourse.

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.

The proponents claim added commuter benefit from a proposed Metro station at Waterloo. Again, this project is in the 'never-never' and no plans have yet been seen; merely promises.

It should also be noted that Appendix F of the proposal 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 afternoon peak. The Henderson Rd and Garden St intersection is not much better. And with Mitchell Road traffic being so slow as to resemble a carpark in both morning and evening peaks, the Davey Road access to the ATP is likely to hold traffic that will be unable to advance into Mitchell Road.

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 Street and Wyndham Street, Henderson Road and Garden Street, and Henderson Road and Wyndham Street.

The GTA Consultants' assessment that the ATP generates between 415vph and 586vph is based on the patently false assumption that vehicular travel to the ATP is contained on-site. It is not.

A large percentage of commuters to the ATP park their cars in the suburban streets surrounding the ATP. Many of them move their cars several times a day in order to comply with local parking restrictions. Indeed, these local parking restrictions were introduced in order to address the enormous influx of commuter vehicles when the Channel 7 / Media Centre complex was opened.

The claim that the increase in vehicles per hour 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 in local streets.

Moreover, it is not just Redfern station which is over capacity – the trains that pass through Redfern station to other major stations on the network also do not have the necessary spare capacity to accommodate the additional ATP workers. This has not been factored in to the EIS.

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 to 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

Prior to Channel 7 staff moving from Epping to ATP, they were promised that there was plenty of free parking in local streets – so there was no emphasis on public transport or addressing parking cost or demand on the ATP site.

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 achieving of 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 requirements of the SEARS.

The EIS notes that the Vice-Chancellors Oval is being considered as a potential site for stockpiling material.

The Oval is used during all hours of the day – from morning and evening fitness classes, taking local dogs for their exercise, lunchtime touch-football and soccer competitions for the ATP tenants, and evening training for local team sports.

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.

Furthermore, Vice-Chancellors Oval sits above the underground railway line running between Redfern and Erskineville. As such, it is unsuitable as a storage facility for a building developer to use.

The EIS does not acknowledge the many 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 impact residential areas. Of concern is the pollution from light 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 building is acknowledged to be over height and over size. The claim that the building needs to be exactly this size to meet the CBA's requirements is unsupportable and unsupported, but it clearly exceeds the current published development controls for the ATP site.

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.

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.

Clearly the bid to purchase the ATP site was on the assumption that a lenient planning process would automatically approve whatever overdevelopment was proposed.

Reducing the size of Building 1 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.

Furthermore, 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 justification for exceeding the FSA for Building 1 does not withstand scrutiny. The interaction of the commercial zone with the adjacent low density residential area has not been adequately addressed. There is insufficient setback given the proximity to residential areas.

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, and 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/ApprovedHeritageDCP2006.pdf](http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0018/119511/ApprovedHeritageDCP2006.pdf).

The size of Building 2 is stated by the proponent as being 35% over allowed building limits.

Furthermore, Building 2 will block visibility of the heritage part of the site from the South – primarily the heritage-listed Locomotive Shed. 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 claimed net benefits to the area, to the State and to the applicant are overstated. The detrimental effects are understated. While the applicant undoubtedly has a right to develop the site, there is no justification for exceeding the allowable envelope for size and bulk, 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 buildings more sympathetic in palette and composition to the heritage area it is in.

The EIS is long and complex, and the affected community was not given sufficient time in order 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 made available, making it difficult to assess the shadow diagrams and to ensure the participation of residents without access to the internet. Only a single copy was held on-site at the ATP for residents to access – and only for access during office hours when residents were already away at work.

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.

We make this submission on the understanding that you will publish a list of submitters including our names, our suburb and our submission.



Gary Speechley



Vanessa Knight