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Ann Elise Keohan  
43 Victoria Road  
Marrickville NSW 2204  
17<sup>th</sup> March 2011

Mr Michael Woodland  
Director of Metropolitan Projects  
Department of Planning  
GPO Box 39  
Sydney NSW 2001

**Major Project --MP\_0191**  
**Marrickville Metro Shopping Centre**  
**34 Victoria Rd, 13-55 Edinburgh Rd, Marrickville**

Dear Michael

Please find attached my submission to the above development proposal **MP09\_0191**. As a resident of Victoria Road I state my most vehement **objection** to the plans. I have outlined my reasons in the following document.

Firstly I would like to thank yourself, the Minister for Planning Mr Kelly, and the department for allowing myself and the community a second opportunity to view this proposal and offer our comments. I understand that this is a rare opportunity in the Part 3A process and am most warmly appreciative of it.

As you already may be aware, I submitted an objection to the original proposal for this site last September, and despite some revisions in the current plans on public exhibition, the majority of my concerns remain relevant, yet unaddressed. I do not believe that the proponent has meaningfully responded to many of the issues raised in the submissions to the original proposal, and one of my most important objections (objection to Civic Place & loss of privacy) has not been addressed or acknowledged **at all**.

I have lived in the inner city/ inner west area for all my adult life, and have resided at my current address in Victoria Road for over 11 years. My partner and I also own investment properties in the Marrickville LGA in Alice St, Newtown and Cambridge St, Enmore and Day Street, Marrickville, as well as in Redfern and Chippendale. We are committed to living, working and investing in this area of Sydney. We bought our own home in Victoria Rd with the view to it being our permanent home for the foreseeable future. We specifically sought a house with a small back and front yard, fully detached, in a quiet tree lined street, close to hustle and bustle of King St, Enmore Rd and Marrickville Rd for eating and entertainment options, yet slightly removed from it in a calmer location for a more relaxed at-home lifestyle. Before we finally settled on this house, we gave consideration to the surrounding conditions to ensure we were making the right choice – aircraft noise was a given in the area, but this small cul de sac had no through traffic, and the noise from the busier Edgeware Rd nearby was not noticeable. The character of the Metro shopping centre was already familiar to us as we frequently drove there from our previous home in Camperdown. The appearance of the centre's entrance in Victoria Rd was (and currently still is) passive, unobtrusive and introspective; it did not appear to generate undue external activity as all the retail elements were contained inside. The trees lining the street and throughout the landscaped area in front of the entrance further enhanced the setting and partially screened the building, helping it blend in to the streetscape.

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I do not think we were naïve to believe that the unique character and appearance of the centre would remain fundamentally unchanged, at least in its general size and form, because it seemed absolute that this deliberate design was dictated by its intimate relationship with the residential side of the street and the surrounding area. It was unimaginable to foresee the event of a redevelopment proposal of such magnitude as that presented by AMPCI.

I strongly believe that the proposal to increase the Marrickville Metro shopping centre, despite some recent revisions to the plans, is -

- grossly inappropriate in its isolated out-of-centre location
- is not sensitive to the predominantly residential heritage context and the scale and nature of the adjacent land use

And that the negative impact it will cause will -

- destroy the amenity of the residents living around it
- reduce property values
- significantly contribute to traffic problems on the local road network
- drain vitality from our local shopping and entertainment strips
- and indelibly change the character of the area for the worse

Other issues of concern include –

- potential loss of landscape-significant trees
- the absence of a detailed Operations Management Plan (particularly given existing long standing operations issues), Operating and Trading Hours

In addition I object to –

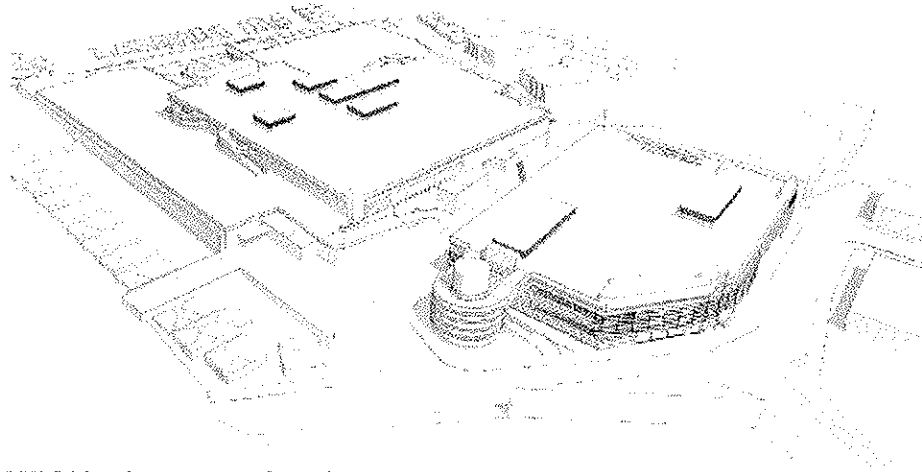
- the continued misleading information and lack of transparency in regard to AMP/Elton's statements of community support for the proposal via "extensive community consultation"

Any perceived benefits of "increased shopping choices" provided by an expanded shopping centre are far out-weighed by the permanent detrimental affect the development will have on the community and the environment. It is not reasonable to allow the financial pursuits of a major corporation to impose such negative impacts on human quality of life.

A shopping mall is not a substitute for a well-balanced, happy and healthy community.

Yours sincerely

Anna Keohan



### **OBJECTION – inappropriate location**

This proposal is grossly inappropriate because it –

- is in an isolated out-of-centre location
- is inadequately serviced by public transport
- is a predominantly car-oriented destination
- is not consistent with sound sustainable planning policies
- will significantly increase traffic congestion and parking problems
- is surrounded by low scale residential housing and small local roads
- does not respect the established character of the historically significant locality
- seeks to replace the traditional retail, commercial and civic function of the true Town Centre of Marrickville

The location of this site is the **fundamental problem** with the Metro shopping centre, and nearly all other issues stem from this one fact. A development that is proposing to expand by over 75% in size, in an area that is not suited to such a massive retail destination, imposes many adverse impacts on the community around it.

The Metro is situated in an old industrial and residential precinct that is **isolated** and not well connected to the necessary infrastructure required for a well-functioning retail destination. It is **not serviced by adequate public transport**, is not on a main road and instead relies on an already congested local road network. It draws pedestrian visits from a 5 to 10 minute walking distance around it, but the majority of visits are via private vehicle. The very nature of a shopping centre concentrated around providing every-day commodities such as groceries, plus a major discount department store offering low cost clothing, homewares and other household goods, means that most people require transport to carry home their shopping – therefore it is indisputably a **car-oriented** retail destination.

It is **not sound planning policy** to locate a major car-oriented retail destination in an isolated residential precinct. The expansion by over 75% more floor space will generate considerable increase in vehicular traffic to the centre, despite AMP/Halcrow's assertion that the redevelopment will cause little or no impact (*detailed traffic issues will be discussed later in this document.*) It is unreasonable to impose this **added traffic burden** on to the already poorly performing local road system.

This significant increase in traffic movements will have to pass through the residential neighbourhood surrounding the centre, and this will have **inappropriate traffic and amenity impacts on residents**.

In addition, a multi-level regional retail complex with unattractive car park levels on top is totally contrary to the recognised and desired character of this area. It would become the dominant built-form and **diminish the setting and character of the heritage and conservation items** of the surrounding low density residential environs.

The proposed expansion of over 75% more floor space endeavours to promote this lower order shopping village from its current supporting role to the higher order Marrickville Town Centre, in to a **major regional shopping centre**. The current Metro undoubtedly performs well above its designated "village" rating, but that does not mean it is well-suited to instantly leap to the level of a major regional shopping centre – the constraints of its location **without adequate transport infrastructure** and its setting amidst low density dwellings render it incompatible with such a plan. All other comparative retail centres (eg Ashfield, Burwood, Eastgardens, Broadway) are on major roads, supported by public transport, surrounded by higher density housing and commercial uses.

The concept of developing this site in to a **Town Centre** detracts from Marrickville's existing Town Centre that has retail, commercial, educational and civic facilities already, and which is also better serviced by public transport and main roads. A **shopping centre is not a community hub**, it will never replace (and it should not attempt to) the function of the traditional Town Centre of Marrickville. All stated aspirations in the AMP proposal and other literature to include community areas or community activities are specious and irrelevant, as this would all be **privatised space** and cannot be viewed or utilised in the true sense of public community space.

Various reports in the proponent's application support the idea of the expansion proposal on many fronts such as \* retaining dollars spent within the Marrickville LGA \* supplying more large format retail space in an area under-served in this department (*not necessarily agreed that this is required or desired by the community - AK*) \* that <some> people surveyed may in theory welcome the idea of more shopping choices at the Metro (*also not necessarily agreed due to the methodology of obtaining such feedback, discussed later in this document – AK*) \* planning strategies that embrace future potential to develop this site in to a Town Centre, etc. All this data and analysis may in part or full be truthfully expressed, but the incontrovertible fact remains that this subject site **is not the appropriate location to build this development** – for all the reasons stated above, and described in greater detail throughout this document.

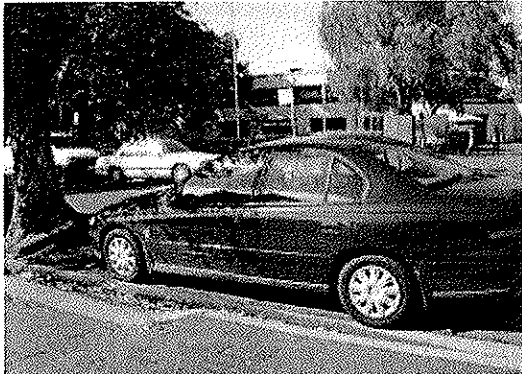
For any of the mooted future plans to work in regard to redeveloping this area with additional retail, commercial and high density housing - the **supporting infrastructure** of well-served nearby public transport and an improved and effective road system **must be in place first**.



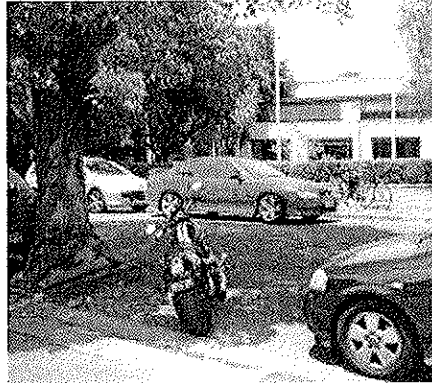
## OBJECTION – traffic, parking, trucks and public transport

This proposal will significantly contribute to traffic related issues -

- there will be a predicted 50 – 75% increase in vehicle traffic
- gridlock traffic snarls and long delays at intersections
- greater parking issues for surrounding residents
- adverse impact on resident's amenity
- safety issues for pedestrians
- massive increase in truck deliveries
- ad hoc truck deliveries in Victoria Road
- more noise and air pollution created
- inadequate public transport



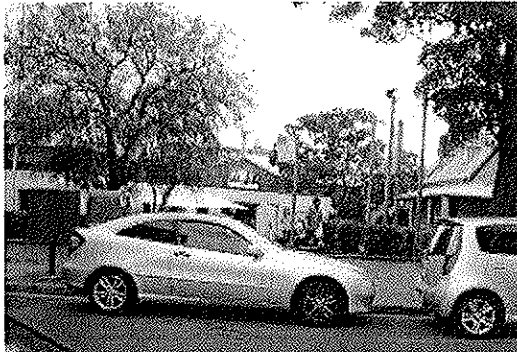
Car parked right across driveway



Motor bike parked right across driveway



2 vans on LHS parked illegally in car ramp and 4WD parked in No Parking zone



Car parked in Mail Zone

Currently we experience **considerable traffic and parking problems** in our street, and surrounding streets and intersections are often gridlocked at peak times. The Metro is not on a main road and the small local roads around here simply cannot support more traffic. There are also numerous daily truck deliveries made to the centre via the loading docks which drive past small dwellings through narrow streets. We also experience ad hoc deliveries in Victoria Rd, with truck drivers who a) choose to ignore the loading docks which they have to drive past in order to access Victoria Rd, or b) because they are unable to access the dock as it is already occupied. Every day there are numerous vehicles parked illegally in No Standing, No Parking, Mail Zone areas, blocking the turning circle in the cul de sac in Victoria Rd, and also parking across resident's driveways restricting access to their own property. Because the Metro is **not well serviced by public transport**, apart from a minority of shoppers who walk or cycle, the main mode of transport to and from the centre is via **private vehicle**. An expansion of the shopping centre will significantly exacerbate an already problematic situation.

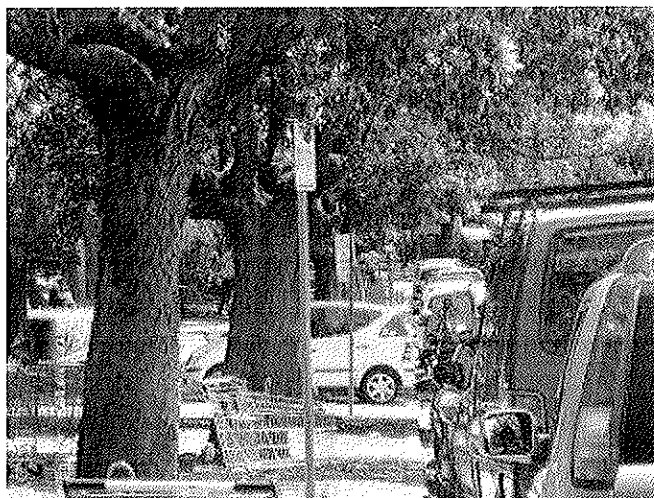
Submission by Ann Elise Keohan – March 2011

AMP's stated objective is to **re-direct customers** from driving elsewhere (for example to Broadway, Ashfield, Eastgardens) and to the Metro instead, by attracting these customers with a huge redevelopment that will include three major brand stores, three major supermarkets and more specialty stores (thus promoting the centre in to a major regional retail centre.) AMP/Halcrow continue to state that there will be no (or minimal) traffic increase, because the "vehicles will already be on the road." This assertion is specious and devious. Those other retail centres are located on main arterial roads (and also well serviced by bus and rail public transport options) – so "re-directing" that traffic to the Metro will be via **small local roads through residential areas**. This is an unacceptable imposition on residential amenity, local road infrastructure and just bad planning.

I believe the Halcrow traffic report in the AMP proposal **does not accurately reflect the true situation regarding traffic in this area**. The methodology employed to assess the traffic implications seems designed to conceal traffic growth and divert attention to other modes of transport that are not substantiated eg referring to increased pedestrian traffic (which is to be somehow drawn from a finite and contained population living around the area) and enhanced public transport (by providing a large bus stop but no additional buses to service it.) The details of these tactics are discussed in more detail in other petitioner's submissions. The Metro centre is a predominantly car-oriented retail destination and a **75% increase** in floor space will indisputably result in an attendant increase in vehicle traffic.

It is disingenuous of the Halcrow report to attribute any increase in traffic to other much smaller developments such as the Annette Kellerman Enmore Pool and a proposed residential development in Alice Street (approx 120 apartments). Any increase in traffic from these developments cannot seriously be compared to the **massive expansion and increased visitations to be expected from a shopping centre**.

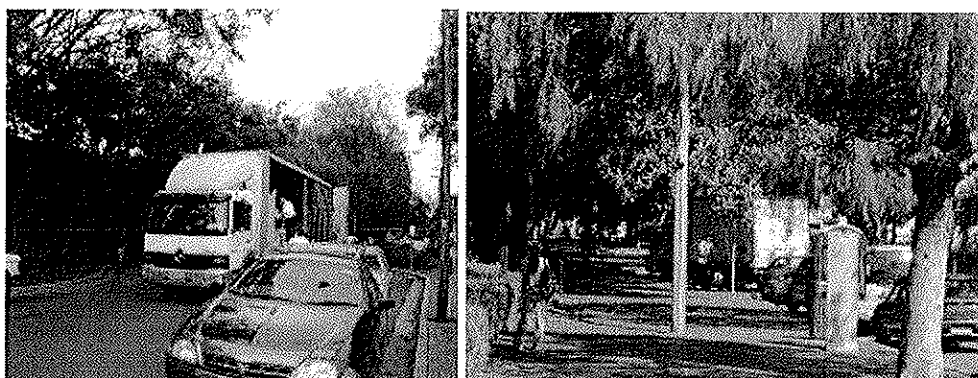
The Halcrow report employs a 'discounted' rate to measure traffic increase, and that shows an **unacceptable increase in traffic levels** of a minimum 35% during Thursday afternoon peak and a minimum 41% during Saturday morning peak. However this discount rate should not be applied due to the increased size of the centre and the inclusion of 3 anchor supermarkets and 3 major brands – so that means that the more accurate forecasting of traffic increases would be 75% on Thursday evening and 50% on a Saturday. The Halcrow report concludes that the traffic increase plus reduced service levels at all nearby intersections is "satisfactory." I assert that this is in fact far from satisfactory and that the **additional burden on the road system is unacceptable**. A single private commercial enterprise must not be allowed to compromise and further deteriorate a poorly performing public road system.



Car and trolley chaos in Victoria Rd

Last year in July 2010 the residents groups Metro Watch conducted their own traffic surveys on several Thursday and Saturday peak periods. Their analysis revealed higher visitation rates and different peak hour traffic flow times to those in the Halcrow report. In addition, on Saturday 28 August 2010 between 11am and 1pm they coordinated a **traffic experiment** by loading an additional 25 vehicles, plus bicycles, on to the streets with a total of 220 trips – representing an increase of 156 vehicles per hour. Each vehicle travelled one of 4 pre-determined routes. Within 10 minutes the surrounding streets were gridlocked in all directions with long queues forming in Murray and Smidmore streets. Within **15 minutes traffic was gridlocked** in Edgeware Rd, Alice St and Llewellyn St and the 2 car ramps to the centre were also jammed with cars unable to enter or exit through the traffic queues. This experiment demonstrated some of the impact an increase in traffic would have on the local street network. During the pre-Christmas period in December 2010, I personally observed and recorded the incredible impact this busy season imposed on the streets and parking situation – at one point I counted **25 illegally parked cars** in a one hour period in this one small strip of Victoria Rd. I also observed numerous incidents of dangerous driving with trucks and vans mounting the footpath, stopping in the middle of the road to load/unload shopping, nearly hitting pedestrians. And finally, a vehicle drove so recklessly and excessively fast in its haste to race to a car space that it **side-swiped my parked car** so badly that it was un-driveable and had to be towed away. This further illustrates the extremely adverse affects an expansion will have on this area.

There will be a significant increase in **truck movements** to the centre, to service 2 more major brands and a 3<sup>rd</sup> supermarket. We could expect a **50 – 100% increase** in truck deliveries to service these 3 new major tenants (a conservative estimate, as the 3<sup>rd</sup> supermarket itself will generate 50% more deliveries.) The Halcrow traffic reports states that trucks will be “encouraged” to access the centre via Edinburgh Rd or Bedwin Rd. That is simply an implausible “wish” that will be impossible to enforce or monitor. Local residents daily experience the **unpredictable & inconsiderate behaviour of truck drivers** in the area. The result will be continued and increased use of Edgeware Rd/Victoria St/Murray St to access the re-located dock plus the 2<sup>nd</sup> dock on Murray St at the new building site. The narrow roads of Victoria and Murray streets will experience more large articulated trucks that do not even fit around the curve in the road, plus all the additional vehicle **noise of engines, air brakes and air pollution**.



L: Truck parked in middle of Victoria Rd obstructing cul de sac to deliver to Metro  
R: Another truck parked in cul de sac to deliver to Metro

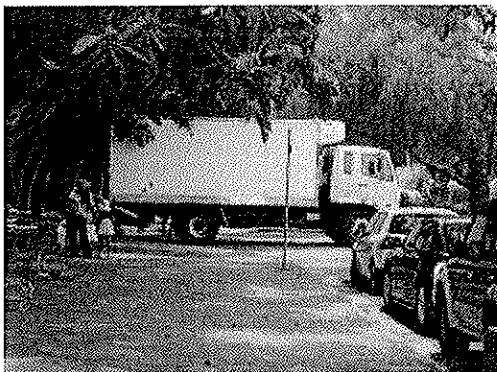


Truck parked in wrong direction in Victoria Rd to deliver to Metro and yet another large truck trying to deliver in Victoria Rd instead of the dock

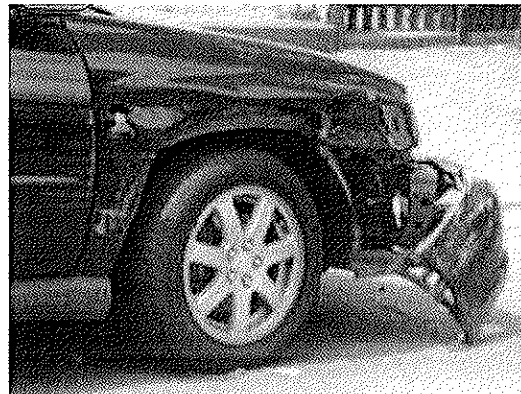
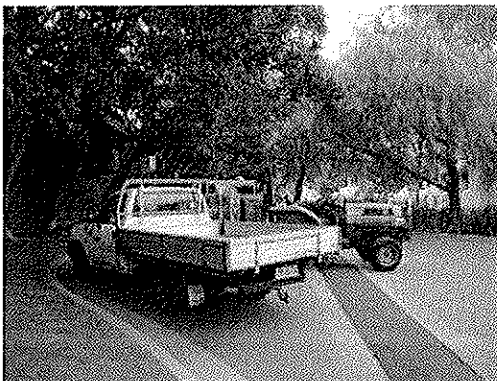


Every day, many times each day, Victoria Rd experiences **ad hoc truck deliveries** in to the Metro. This is noisy and disturbing and is an unmanaged and unmanageable situation that has been going on for years. These trucks/vans often unload in front of the Mail Zone No Standing area. Some are so large that when turning around in the cul de sac at the end of Victoria Road, they have to reverse beep and perform multi point turns often backing up on to the footpath at a very narrow junction.

Increased car and truck traffic will also contribute adversely to **pedestrian safety** in the area. There is a school, kindergarten and church only a block away, and Murray and Victoria streets have high pedestrian numbers traversing the roads, often from behind parked cars. Cars, buses and trucks often speed along the narrow curved section of the Murray/Victoria streets junction, and unbelievably, given the nature and short length of this section of Victoria Rd, vehicles speed along it too. Large 4WD, vans and trucks mount the footpath at the Victoria Rd cul de sac trying to turn causing danger to pedestrians on the pathway. Vehicles perform U-turns in Victoria Rd near the junction with Murray, posing an unexpected danger for cars entering around the corner with no visibility because of the curve and the Vicars wall corner. The **zebra crossing at the junction of Victoria and Edgeware roads is frankly dangerous**, because due to the difficult nature of turning in to or out of this intersection cars drive over the crossing and accelerate quickly whenever there is a break in the traffic either way on Edgeware Rd. AMP's response to submissions regarding pedestrian safety in this area was chillingly indifferent, because they said the RTA did not mention it in their objections. Unfortunately many of the day to day issues that the locals experience first hand are not always so obvious to outside agencies.



Large trucks reversing in to and mounting the footpath because they are too big to turn around in the cul de sac in Victoria Rd – this presents considerable risk to pedestrians



L: Trolley collection truck and van blocking cul de sac  
R: My car after it was side swiped

The Halcrow report projects additional usage of local roads of 365 vehicles on Thursday and 655 on Saturday. The traffic on our residential roads **already exceed** the RTA's environmental capacity performance standards as below –



## RTA GUIDE TO TRAFFIC GENERATING DEVELOPMENTS

The RTA's 'Guide to Traffic Generating Developments' defines the following environmental capacity performance standards for local residential streets and collector roads –

### LOCAL ROADS

Environmental goal – 200 vehicles per hour in peak hour

Maximum flow – 300 vehicles per hour in the peak hour

### COLLECTOR ROADS

Environmental goal – 300 vehicles per hour in peak hour

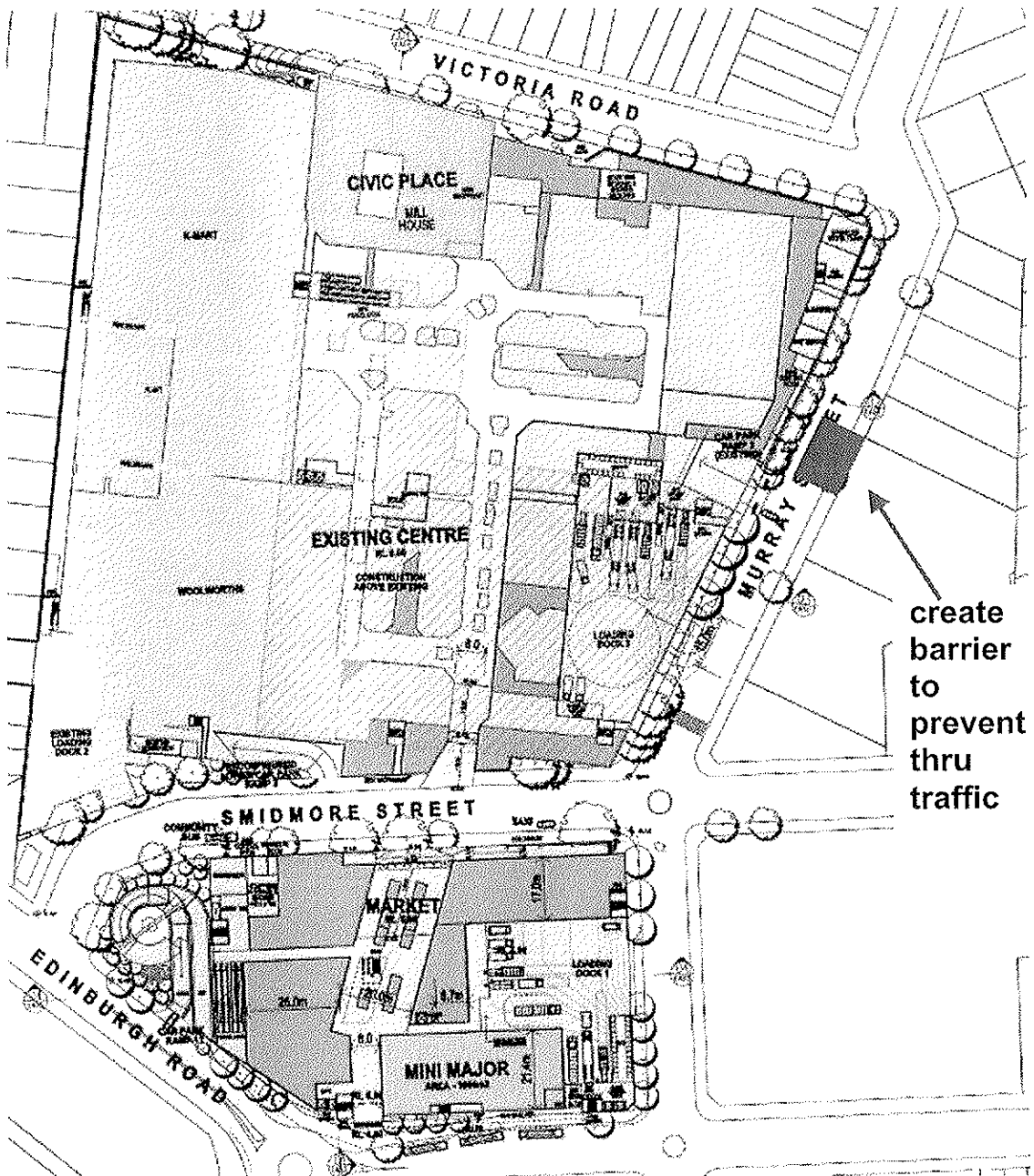
Maximum flow – 500 vehicles per hour in the peak hour

The provision of a new extended bus stop **does not solve the public transport** issue – unless new bus routes are provided that service the Marrickville LGA, so the assertion that a larger bus stop will encourage more patronage of public transport and thus ease vehicle reliance is simply untrue and unjustifiable. The 3 railway stations nearest to the centre are at a minimum 800 metres and a good 10-15 minute walk, which is not conducive to carrying shopping.

I find it impossible to accept the AMP/Halcrow report's assertion that the expansion will not result in increased traffic directly attributable to an expanded centre. Their traffic report is so flawed that I **request the Dept of Planning to conduct their own independent traffic report** to assess conditions in this area. That is the only way that the true state of affairs regarding traffic can be properly reviewed and understood. That report should also include analysis of the traffic implications across the wider road network, since the Halcrow report is confined to the area directly around the centre. Lord St, Darley St, Lynch St, and other known 'rat runs' are simply ignored. The traffic implications of the massive IKEA complex that will impact St Peters and Edgeware Rd and the whole road network of the inner west (IKEA is a major international drawcard that will generate visitations from all over Sydney) must be taken in to consideration from an overall planning perspective. I am concerned that unless better road and public infrastructure is planned and put in place first, it will be a case of letting the developers **"just build it now and let the local council or state government clean up the mess later."**

In order to provide some relief from the deprecations of excessive traffic, truck and parking problems on Victoria, Murray and Edgeware roads it is **essential to provide a solution** that will help to address some of the issues above. A **physical barrier must be installed** to prevent through-traffic on Murray St (*as shown on the diagram below.*) It is not sufficient to expect that "behavioural change" will re-direct the additional traffic load from here to Edinburgh Rd. A barrier will have the effect of deterring delivery trucks and other vehicles from turning in to/from Edgeware Rd at the Victoria/Murray intersection, and **will assist in the Halcrow strategy of "encouraging" trucks and other vehicles to use Edinburgh Rd.** By reducing usage of this intersection, it will reduce the danger for pedestrians using the zebra crossing, and will in fact **enhance the overall safety for pedestrians** in the Murray/Victoria streets precinct. In addition, by encouraging traffic to use the alternative Edinburgh Rd route, this solution will also provide significant traffic relief to Edgeware Rd. To further complement this solution and increase its effectiveness, a Right Hand Turn must be introduced at the Stanmore/Enmore/Edgeware road intersection, allowing traffic from the north to access Enmore Rd to the right and thus in to Edinburgh Rd.

It is **unacceptable for a single private development to impose such a massive traffic burden** on small local and residential streets for its own commercial benefit, and at the same time severely adversely affect the amenity of the community. The interests of the public should prevail over the private interest.



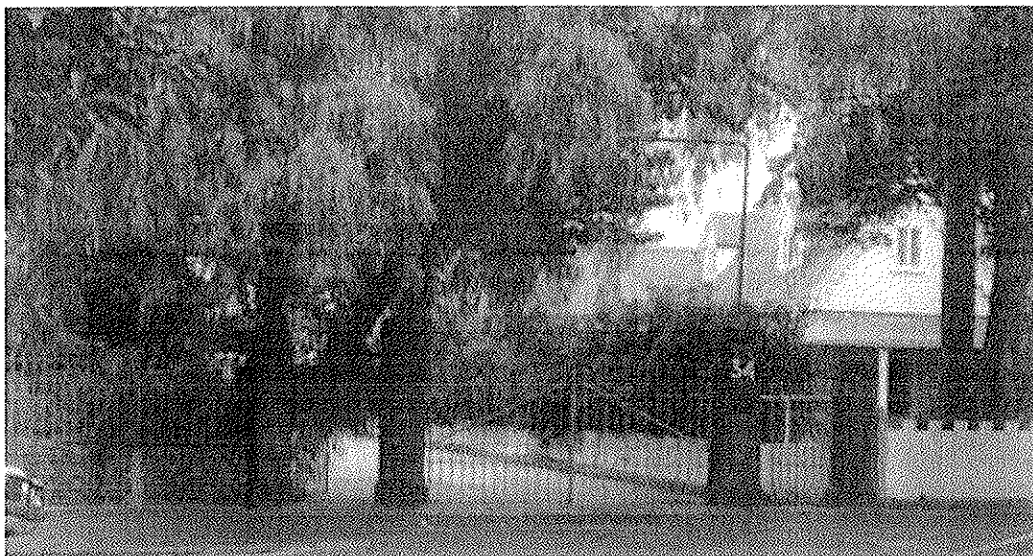


Figure 2.16

'Mill House', circa 1977

Source: Photograph courtesy of J R Vicars

## OBJECTION – visual impact

This proposal -

- is not sensitive to the predominantly residential heritage context
- does not conform to the predominantly low density residential nature of this street
- makes no attempt to design in a manner that is sympathetic to the established character of the area
- conflicts with the scale and nature of the adjacent land use
- is 75% bigger than the current site

Council Business Centres DCP states that the site should ensure that the "*building is sensitive to the heritage context and the scale and nature of adjacent land uses.*" Marrickville Metro is a unique shopping centre situated amongst items of environmental heritage that include but are not exclusive to the Mill House. The proposal **does not sufficiently acknowledge the historic context of the period houses on 3 sides of the centre**, and the new plans make no attempt to integrate the design in a manner that is sympathetic to this established character of the area. The industrial area lies to the back of the Metro, and is a different matter, however the architectural concepts make reference only to this industrial nature and ignore the predominantly heritage nature of its most prominent entrance.

The northern side of Victoria Rd that directly faces the Metro is a row of a dozen one-storey Federation cottages. This rare intact row of dwellings has **historic importance** as they relate to Mill House when it operated as a mill, housing supervisors and workers. This is an Amendment 1 Area and a proposed Heritage Conservation Area. Currently the frontage of the Metro on to Victoria Rd is **low key and unobtrusive**, and integrates reasonably well with its surroundings, also being camouflaged to some extent by large mature trees around the perimeter and on site.

The importance of these period buildings, including the Mill House, establishes the character of the streetscape. Any proposed new built form should **respond sensitively to the heritage significance**, and not seek to overwhelm and dominate the landscape. The current plans though somewhat reduced and set back on the north/east corner from the original proposal, are still **75% bigger**. There will still be a **highly visible and unattractive bulk** behind the Mill House, presenting dominantly to the streetscape. In particular the 2 additional levels of exposed

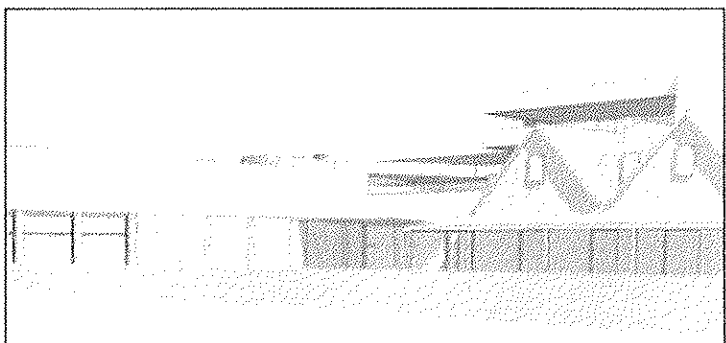
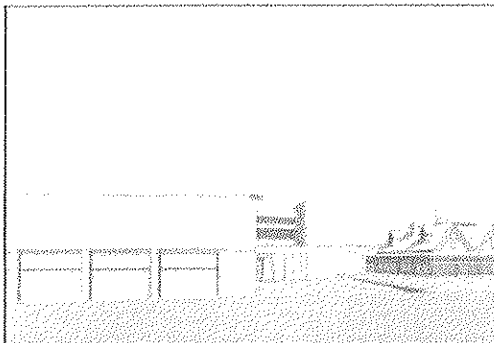
car park levels will be visually unappealing. The plans should undertake to ensure that all parts of the building that are highly visible to pedestrians are designed at a very fine scale. Superior design principles would dictate that car parks were located at basement level, and if above ground, to ensure they are concealed from public view and 'sleeved' by other uses. Similarly, lift tops and mechanical plants should be concealed from view.

The Conservation Management Plan for the Mill House by Graham Brooks & Assoc says "*future changes to the shopping centre should not visually dominate the Mill House*". The Development Assessment Report # D0910 by Marrickville Council states that the "*substantial increase in building size which will dwarf the Heritage Item (Mill House), and have a high impact on the residential scale and heritage significance of Victoria Road, and the end of Murray Street*". However the plans still clearly present a **significant adverse impact** on the heritage Mill House and the historic Victoria Road houses opposite.

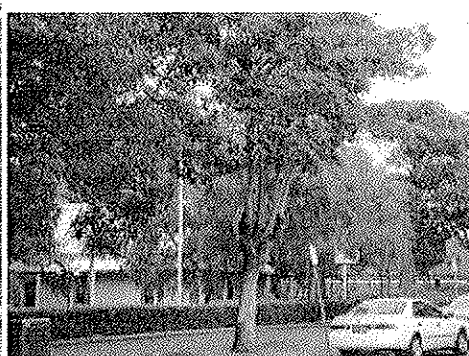
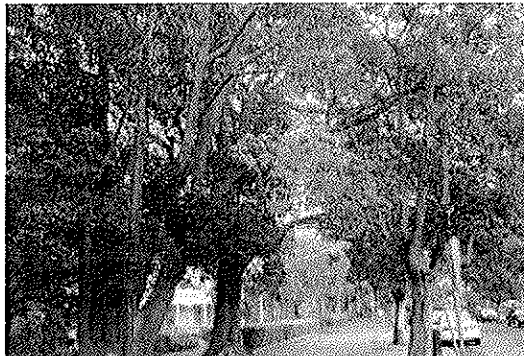
The architectural designs do not represent an expression of the scale of the existing single storey surroundings, **nor do they acknowledge or interpret the character of the existing heritage items** on the site and the direct interface with the historic items opposite on Victoria Rd. The plans are similarly unsympathetic to the small scale period houses in Murray St and Bourne St.



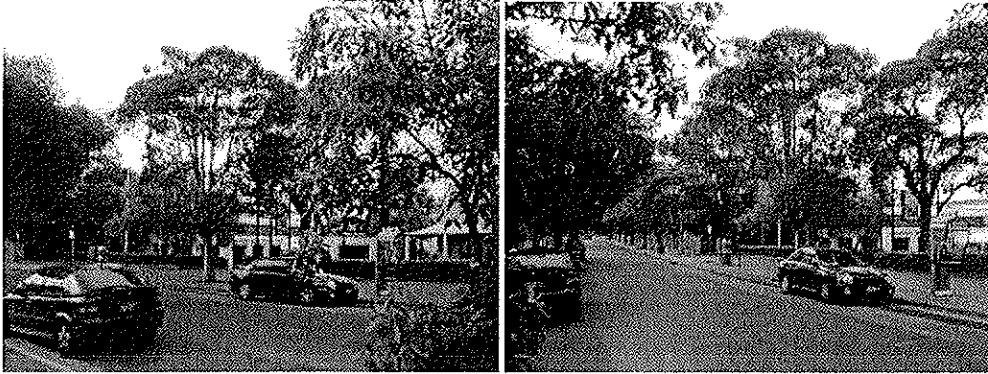
The view from Victoria Rd across to the Metro with the screening of trees



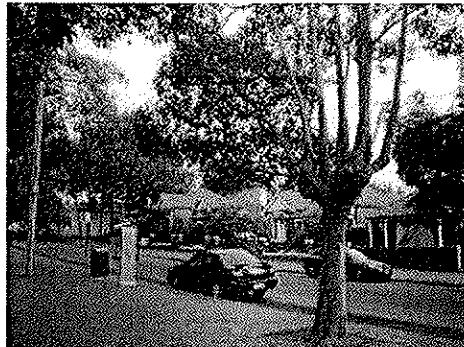
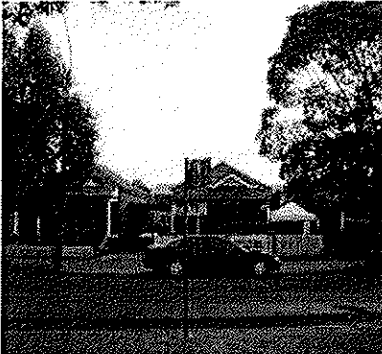
Proposal with large dominating bulk and unattractive car park levels above



Views of the Metro screened by trees



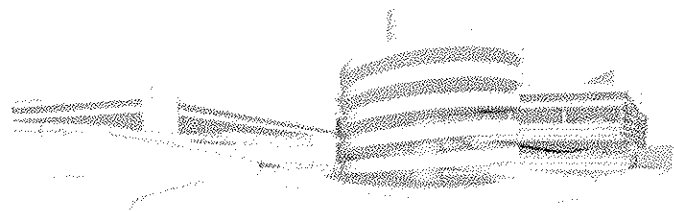
Victoria Rd (early morning) - illustrates how narrow the street is & the distance between residential houses/footpath and the centre opposite)



The view from boundary of the Metro across Victoria Rd to residential houses



Victoria Road - small scale Federation houses which are a row of intact dwellings from the period associated with the heritage Mill House, these houses were where the supervisors and employees lived

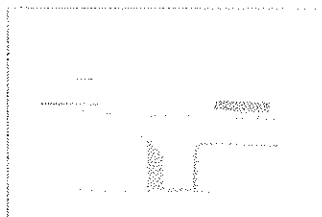


SOUTH-WEST CORNER EDINBURGH ROAD

Bourne St – backs on to Metro centre > will have a massive bulky wall & building with car ramp upstairs over existing centre, plus an enormous spiral car ramp will be visible at the end near Smidmore/Edinburgh Rds

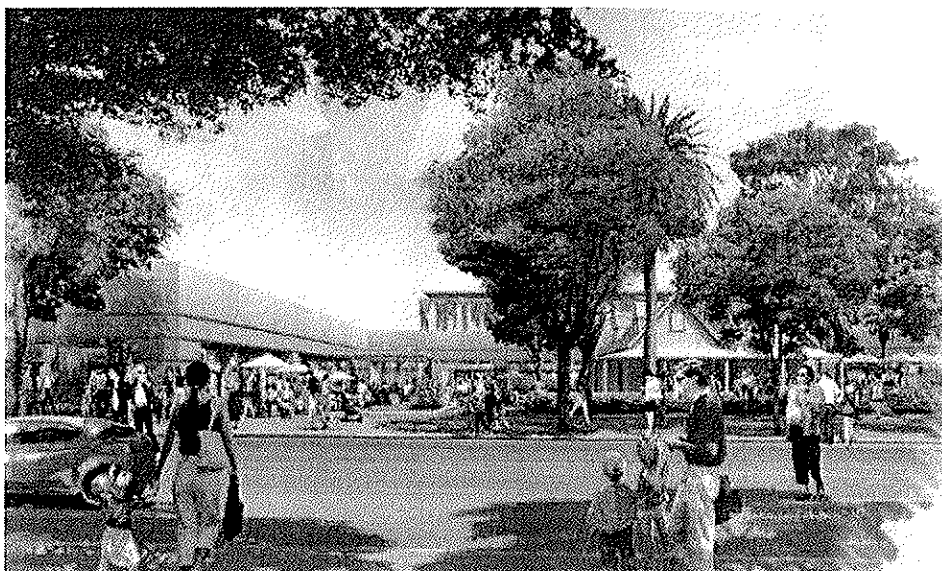


Bourne St – existing



- proposed





## OBJECTION – impact from Civic Place and retail activation

This proposal –

- is an inappropriate use of space that directly impacts on residential property opposite
- seeks to replace the true community civic centre of Marrickville
- imposes unreasonable loss of amenity and privacy to the residential houses opposite
- will result in loss of use of domestic private space



View of the current Metro entrance (taken in 2 shots)

The proposed Civic Place at the front of Victoria Road is **completely inappropriate in its location** directly facing small Federation cottages across a narrow street. Its intentions are also unclear. A private “Civic Place” in a shopping centre is not only ridiculous, it **seeks to replace the true community civic centre of Marrickville**. The plans include increased retail space expanding further from the current building towards Victoria Road, public performance space, a café plus other eating areas. This will involve the removal of some trees, opening up of the current landscaping, addition of more paved hard surfaces and ‘active edge’ retail areas. There is only 15 metres separating the centre from my home, with **no buffer zone to help minimise** the negative impact.

The function of civic space is for public events, community congregation, celebrations and other activities. Communal space of this nature is **not complementary to nearby residential amenity**, and should be planned in areas separate from dwellings. Indeed it is not the

responsibility of a private shopping centre to provide such a space. Active retail frontage is also inappropriate when placed in such close proximity to residential areas.

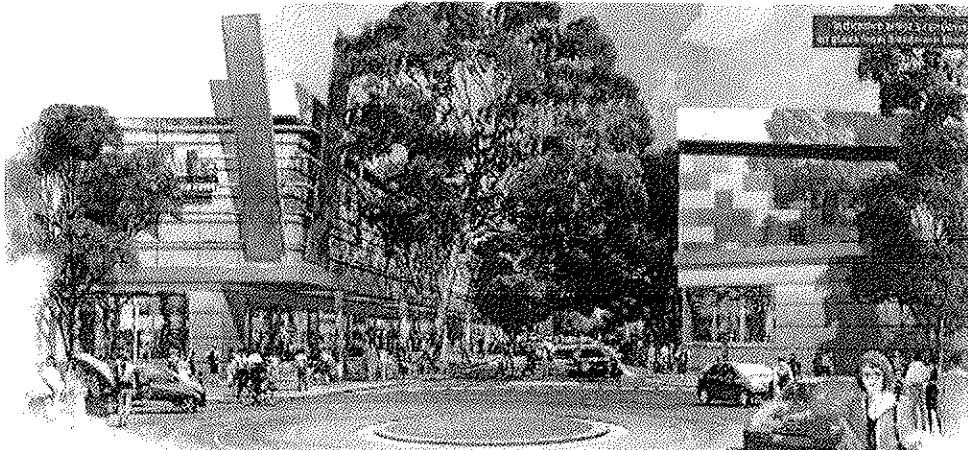
This proposal will severely impact the ability to experience quiet enjoyment of my home. All this "activation" in the Civic Place will change the existing unobtrusive and relatively quiet Victoria Rd entrance in to **an aggressively active and noisy area**, with congregation of people both day and night, and will result in increased levels of noise disturbance. Even now, the built form and hard surfaces of the area mean that all noise (particularly human voices) is amplified and funneled across the road in to the houses (and indeed the back yards) of the residential dwellings. Such landscaping will need to be maintained with cleaning and hosing of hard surfaces, hedge trimmers etc which will cause further noise disturbance at night/after hours. The new landscaping with more hard surfaces, additional seating etc will also encourage nighttime congregations of people, and possible **late night anti-social behaviour**, partying, skateboarding etc. Measures to improve security such as guard patrols and additional lighting will conversely add to impact negatively on residential amenity.

The increased pedestrian traffic and 'community events' will **erode residential privacy**. As our houses and yards are small, we utilise all areas and every piece of space is precious to us – our front verandahs and small yards are used to relax, entertain and play. When our houses are turned into public "fishbowls" we will be denied the use of the front area of our homes, unless we want to be on public display. Our main bedrooms all face the front of the house, so any nighttime noise or activities will cause sleep disturbance and deprivation. **This is unacceptable encroachment on our privacy, and is a serious impact on the amenity of our homes.**

The **current low-impact passive environment** of the front area of the Metro on Victoria Road **must be maintained as is**, and all additional activity must continue to be internalised inside the centre. Additional retail space in this area is **not acceptable**. Promotion of this area as an **active "public square"** is also unacceptable.

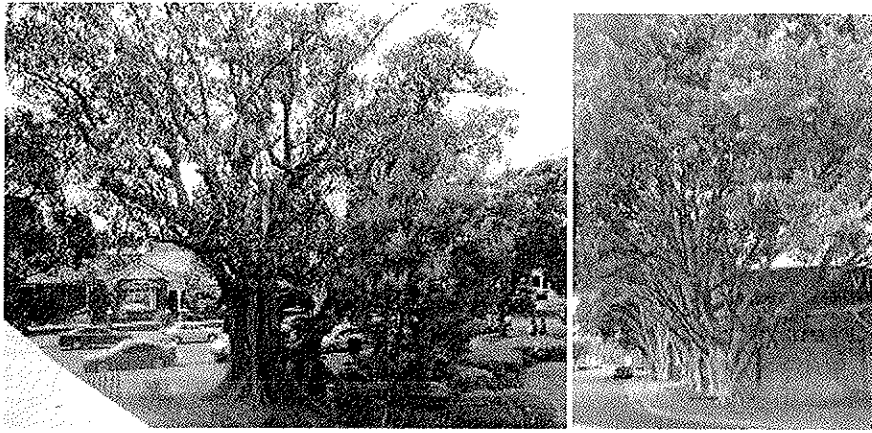
The amenity of the Metro shopping centre will not be impacted if the Civic Place plan does not go ahead because, after all, it is a place of commercial and not community. However the amenity of the residents in this street will be **severely and permanently impacted** if the Civic Place is approved.

The new proposal includes plans for creating a more prominent entrance to the Metro at Smidmore Rd. If this expansion proposal should go ahead, Smidmore Rd is a manifestly more appropriate location for a main entrance as an alternative to Victoria Rd. In the event of this proposal being given approval, I request that the Dept of Planning insist on further **amendments to the plans that will reduce the impact on Victoria Rd residents** as described above.



Smidmore Rd presents a more appropriate option for the main front entrance to the Metro





## **OBJECTION** – potential loss of landscape-significant trees

This proposal –

- is insufficiently clear about which trees will or will not be removed
- seeks removal of mature trees of landscape significance
- includes potential loss of natural habitat for birds and bats
- may have negative environmental impact

I am concerned about the **uncertainty** of many of the trees around the centre particularly those lining the Victoria Road side. The majority of these trees have **high landscape significance**, they provide screening and privacy from and to the centre for residents, add visual beautification to the streetscape, are the habitat for birds and other wildlife, and **help cleanse the air and reduce air pollution**.

Many of the trees are rated in the arborist's report as "consider for retention" which is no guarantee that they will be retained in the new landscaping. One of these trees is a huge heritage Moreton Bay Fig, others are majestic weeping figs and peppercorn trees which **provide the streetscape with a distinctive character**. The Arboriculture Impact & Assessment Report by IVM states that "87 trees have been surveyed as part of this assessment. The surveyed trees were assessed as generally being in good health and structure." It identified 7 trees in the AMP plans for removal **to accommodate proposed building or vehicular entry footprint**. 5 of these 7 trees were given a Retention Value "Consider for Retention" and the other 2 trees 37 & 57 "Priority for Removal."

14 trees - Priority for Retention  
 51 trees- Consider for Retention  
 5 trees - Consider for Removal  
 10 trees - Priority for Removal

Marrickville Council's last submission expressed concerns about removal of trees and also identified 14 trees with **high landscape significance** – in the IVM arborist report **only 4** are given "priority for retention" rating. The AMP Statement of Commitment says "*The proponent agrees to undertake the measures as recommended in the revised Arborist report prepared by Integrated Vegetated Management, including the retention of trees 1-36, 38–55, 61–66, 68-87 (Total 68 trees) Further investigation in the form of exploratory root trenching should be undertaken to determine the extent of root spread and the impact of the proposed development on Trees 20-36, 38-55, 61- 66, 69-74 (47 trees). Trees 48 and 57 have structural defects and are to be removed.*" It appears from the report that any tree that may impinge on the proposed development footprint will have a very short life span. The supplied plans indicate that eighty (80) trees are proposed for retention however in the above statement only 68 trees are identified for retention and of these 47 trees need further investigation. So the reality is another 47 trees

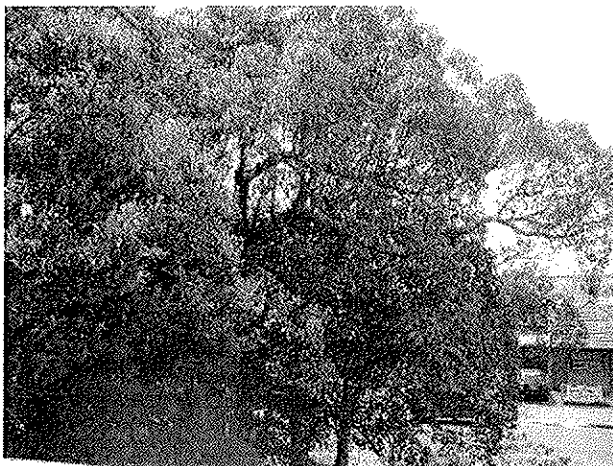
maybe in danger of being removed. Only 2 trees were identified for removal. Of the 87 trees surveyed, the AMP Statement of Commitment only account for 70 trees, therefore there are **17 trees that may be targeted for removal** as the IVM report rates them in the "removal" category. In conclusion it seems that out of 87 trees assessed as generally in good health and structure **only 14 are given "priority for retention."** And even with this definition, it cannot be assumed or guaranteed that these trees will be kept.

One tree in the forecourt area of the Victoria Road entrance was **cut down last week without consent or permission by the council.** This is a serious breach of the Marrickville Tree Preservation Order.

This action, and the perplexing lack of clarity in the IVM and Statement of Commitment in regard to preserving trees, does not imbue me with confidence that the trees that form such a **significant visual feature around the Metro will be treated with respect.** There can be no justification for the removal and destruction of such beautiful, useful, irreplaceable giants of nature, simply to satisfy a designer's idea of shopping-mall aesthetics or to make the construction of the redevelopment easier. Trees provide natural habitat and offset some of the impact of poor air quality, which will worsen if the expansion were to proceed and bring in 75% more traffic (= pollution). **The unnecessary removal of any trees will have unacceptable impact on the ecology and environment.**

The Statement of Commitment has been revised to include the requirement to undertake a services survey before the preparation of a final landscape plan for the public domain and "*The final landscape plan to be prepared and agreed by Council.*"

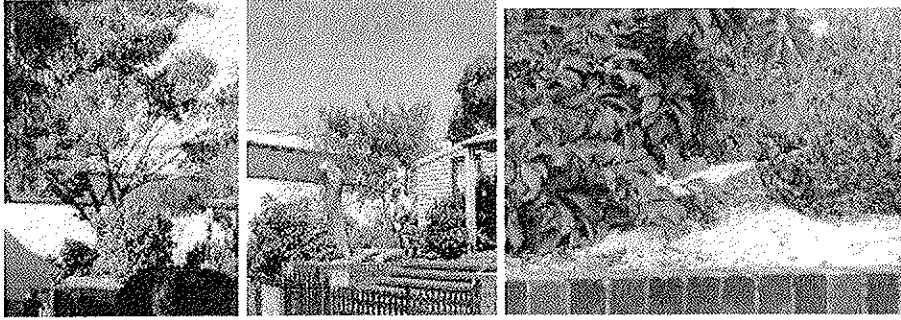
If this proposal were to be given approval, then I request the Dept of Planning to instruct the proponent to **consult extensively with Marrickville Council as well as local residents** (and to obtain council approval before any work commences) regarding the plans for all new landscaping to ensure the very best outcome for the environment.



View from car park on top of centre looking on to Victoria Rd – illustrating the screening effect of the many trees in the Metro forecourt area and street



This tree in the foreground seen from car park was illegally removed by the Metro last week (see below "after" shots)



The tree in various stages of removal



### **OBJECTION – current unresolved and future impact on amenity**

This proposal –

- will impose unreasonable negative impact on residential amenity
- current ongoing issues are still unresolved
- there is an expectation that due to past poor management these and future issues will also continue to be unresolved
- detailed Operations Management Plan required with input from residents and council
- require new trolley management system that will include locked-wheel mechanism
- dock operating hours of 7am to 10pm is unacceptable and must be revised to 7am to 7pm
- late night trading hours in Smidmore Rd or Victoria Rd will impact surrounding residents and is not acceptable
- require commitment on trading hours
- require commitment on operating hours
- require revision of all existing operating consents to be replaced by one overarching consent for all tenants and the operation of the centre in general

There are **many issues that currently affect the residents in this area**, such as abandoned trolleys, litter dropped by shoppers, noise disturbance due to maintenance/cleaning/renovation activities (generally conducted late at night or early morning causing sleep disturbance) and so forth. For many years up to the present, the management of these issues by the Metro has been **extremely disappointing and has led to dissatisfaction and frustration for residents**. There is concern that these issues and others, will continue to be unaddressed, and will in fact worsen due to more trolleys, more litter, more maintenance activities etc due to the expansion.

Light spill from lighting in the centre, from cars, from retail frontage, from spot lights in the Civic Square will negatively impact residential amenity.

Additional noise from mechanical plants, more car park levels and ramps, increased vehicle and pedestrian traffic, activities in the Civic Place will all **negatively impact residential amenity**.

A **complete detailed Operations Management Plan** must be provided as soon as possible, and input from Council and local residents would be essential in creating a fair and reasonable set of conditions that will not unduly impact residential amenity. Timing of cleaning, maintenance and repairs/renovations need to be addressed and included in the Operations Management Plan to the satisfaction of residents to **avoid continuing noise disturbance in the future**.

It is also unknown what the operating hours, and trading hours, for the centre are to be proposed to be. There is some commentary in the proposal about late night trading especially in the 'entertainment' precinct on Smidmore Road. **It is extremely important that these hours, and any activities, do not impact residential amenity.**

There must be deliberate consideration and resolution of the problematic **ad hoc delivery trucks**, as well as regular security trucks parking in Victoria Rd with engines running for extended periods of time. All delivery vehicles including security vans **must be enforced to use the loading dock** areas provided and not use Victoria Rd at any time, and responsibility for monitoring and policing of this issue **must be assumed by the Metro management.**

The operating hours of **7am to 10pm for all the docks is not acceptable** as it will mean that massive delivery trucks will be traversing this narrow local residential roads at unreasonable noise levels and will **severely impact resident's ability to quiet enjoyment of their homes and sleep** from 7pm to 10pm. The dock operating hours must be revised to a more acceptable 7am to 7pm.

The problem of abandoned trolleys requires only one solution – **installation of a lock-wheel mechanism that prevents all trolleys** belonging to all tenants of the Metro leaving the building or car park.

The objections above remain **exactly** the same as my previous submission. The centre cannot successfully manage the current issues; it is uncertain they will be able to manage the manifold additional problems that will ensue from the expansion.

Much of the current difficulties arise because there are numerous, conflicting and out of date operating consents amongst the many Metro tenants so it is impossible to manage effectively and consistently. I request that the Dept of Planning instruct as part of a condition of approval, if this is granted, that the Metro site must employ a **stream-lined over-arching operating consent**, with input from council and residents to ensure the best possible outcome for a future neighbourly relationship.



**OBJECTION – the continued misleading information and lack of transparency in regard to AMP/Elton’s statements of community support for the proposal via “extensive community consultation”**

Consultation throughout this project has been –

- inadequate
- misleading
- is not reflective of how this local community feels about the expansion plans

The consultation approach for this project has been entirely unsatisfactory and also misleading. Despite living directly opposite the centre, the majority of the residents in Victoria, Murray and Bourne streets were unaware of the expansion plans until the exhibition period last year, were not contacted or consulted by AMP or their agency, did not receive the various newsletters supposedly letterbox delivered, and were not advised of the community forums. The information leaflets and surveys did not contain information about an expansion, and only referred to a ‘revitalisation’ which led most people to believe this was a renovation and not a massive redevelopment.

It was only by chance that I found out about the proposal in June last year, and immediately googled and found the Talk Marrickville Metro website where I lodged a furious email demanding to be included in this so-called community consultation – this led to the first meeting I had with AMP. Later residents meetings after the exhibition period ended were arranged by AMP with one set of residents in Murray St – it was only because these residents asked other neighbours to come along for support, did we have the opportunity to also meet with AMP at this time. We grabbed this chance to gate crash because we did not know if we were to be similarly contacted.

One of the key concerns about the previous community consultation process by the AMP project team was the lack of transparency. This has not changed as currently the Elton group has staff gathering signatures (name and signature only, no contact information to confirm if they actually exist or where they live) at the Marrickville Metro and there is no supporting material such as drawing showing the size of the expansion and how it will look. What is asked is “*Would you like more retail shops at the centre? Sign this petition?*” When pressed on the details of the actual size, traffic implications etc they did not know. “*We are just getting signatures*”. Other conversations have been “*It’s about getting feedback from the community*” or “*It’s part of*

*ongoing community consultation.*” However no opportunity I sprovided to offer feedback other than to sign a form to support the expansion.

It is apparent that AMP are so desperate to appear to have support for this expansion that they are continuing to resort to less than transparent true community consultation but instead are going to misinform and mislead people.

On the other hand, residents group Metro Watch have sought extensive consultation throughout the community via feedback surveys; door knock; traffic surveys; traffic “experiment”; numerous leaflet drops; letter writing; media events; monthly newsletters; email lists; facebook groups; website; attending various community events such as Addison Road Markets to talk to people, show the plans and explain the project as well as encourage letter and submission writing; talking ceaselessly to our neighbours and people in the area; and I can confidently say that this group does genuinely express the opinion and concerns of the wider community.

AMP has not treated Metro Watch as a valid community representative group in the same manner as it dealt with other organisations and agencies, as demonstrated in the lack of response to the Metro Watch submission.

