

635

SUBMISSION OF OBJECTION TO
DEPARTMENT OF PLANNING
from
METRO WATCH

**Marrickville Metro
Redevelopment Watchdog**



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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 Mr Woodland

Please find attached this objection to the above development proposal **MP09_0191** submitted on behalf of the community of Marrickville and surrounding suburbs by the local residents action group Metro Watch – Marrickville Metro Redevelopment Watchdog.

Metro Watch is very small group of people who spontaneously got together last year to help raise awareness in the community about the expansion proposal, to help people access information, and to encourage community involvement in opposing the proposal.

This has been achieved via genuine extensive consultation with the community in the form of -

- community information forums x 2
- rally and information event
- feedback surveys
- door knocks
- traffic surveys
- traffic "experiment"
- numerous leaflet drops
- media events
- monthly newsletters
- email lists
- facebook groups
- website
- attending various community events such as the Marrickville Road Festival and Addison Road Markets with copies of the plans of the expansion project to show people
- talking ceaselessly to our neighbours and other people in the area

The group can confidently state that this group does express the opinion and concerns of the majority of the 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 by the lack of response to the Metro Watch submission. In addition, AMP attempted to deny entry to Metro Watch supporters to an open public information session held in July 2011. Police was contacted in advance of the group attending the Metro, and members were told by security officers that AMP had requested this group not be allowed on the premises, despite the fact that this was a public event to which interested people were invited to attend. The group was not rowdy or disruptive and comprised of people from a variety of backgrounds and ages including children.

OBJECTION – LACK OF COMMUNITY CONSULTATION

Consultation throughout this project has been –

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

Metro Watch –17 March 2011



All the documents commissioned by AMP state that the majority of the community want the expansion of the Marrickville Metro and that they are "listening to the community." The real facts indicate otherwise – the original proposal received 576 submissions with 549 against and only 27 in support. A petition of 4,830 signatures objecting to the expansion was collected from the local community.

Throughout the process the consultation approach for this project has been unsatisfactory and misleading. The majority of the residents in close proximity to the centre, for example in Victoria, Murray and Bourne streets and further, state that they were unaware of the expansion plans until the exhibition period last year, and were not contacted or consulted by AMP or their agency. These same residents also claim that they did not receive the various newsletters supposedly letterboxed delivered and were not advised of the community forums. This belief was confirmed via Metro Watch's own surveys and door knocks.

Those people who had received any information or had been contacted via AMP survey were confused, as the AMP Metro 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.

The huge majority of submissions sent last year in response to the original proposal consistently state that they do not want or need this expansion, and most people claim that they are happy with the current size and prefer it in this format as it is easy and convenient to shop there on one level without a maze of multi-levels and duplication of choices.

It is apparent that AMP is not interested in the majority of community concerns, and is certainly not listening to the community. This can be demonstrated by their response to the public submissions which is arbitrary, sketchy, and inadequate in most cases. Some of the most pressing issues have still not been addressed, or are "not agreed to" by AMP.

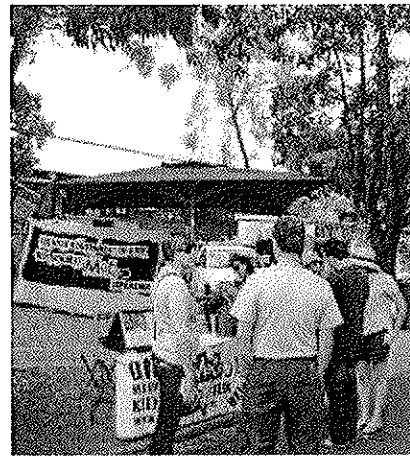
The key issue of traffic is simply not acknowledged and the new Halcrow traffic report now states there will be little expected traffic increase. The majority of objections include grave concerns about the traffic and parking implications – over 500 people raised this issue, as well as almost 5000 petitions. And the Halcrow report sweeps this under the carpet. It simply must be accepted that the day to day experience of people living in this area has far greater credibility than a privately commissioned report by the proponent, the aim of which is to portray the expansion proposal in its best light and to conceal the real negative impact.

All issues of current operations management, such as abandoned trolleys, litter, noise disturbance from maintenance activities, are relegated to a non-existent 'operations management plan'. The current state of affairs in regard to management of consistent ongoing unresolved operational issues is simply ignored in the response. And the actual management of these issues, despite assurances from the Metro management team and statements from them about fostering better neighbourly relationships, is still abysmal. There is no confidence in local residents that current, ongoing and future issues will be resolved satisfactorily.

During more recent community consultation by Metro Watch, it also appears clear that the revised proposal of increasing the current size of the Metro by 75% still does not have the support of the majority of the local community. Metro Watch recently did a letter box drop and three information sessions at Addison Road Markets,

and in speaking with residents it was astonishing that most still thought that the project had been dropped last year, and they were very concerned it was still proceeding with an increase of 75% more floor space.

An information booth was held recently over 3 Sundays at the Addison Road Sunday markets. All technical drawings of the revised development were on display so that people could assess for themselves the scope of the revised development. We spoke to many people over the three days and the majority of people were very opposed to the revised expansion plans. There were very few in support of the development and this was reflected in the number of submissions completed.



Metro Watch information booth at Addison Road Markets – March 2011

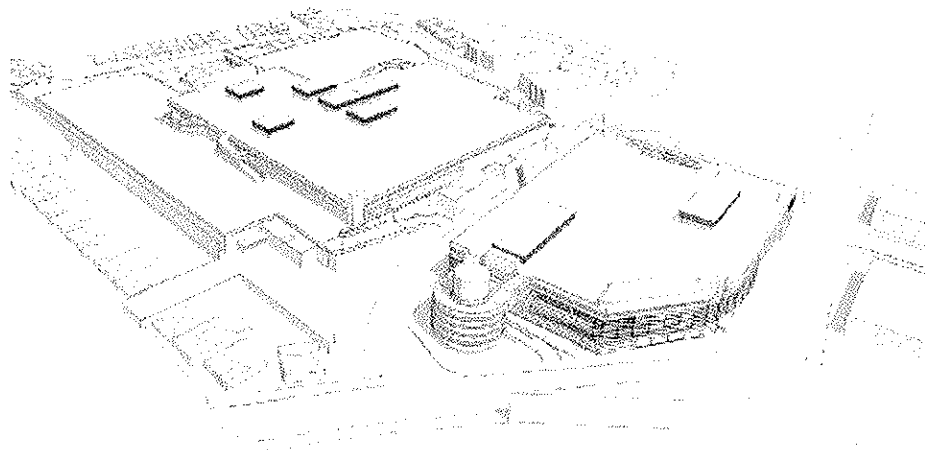
A major concern about the previous community consultation process by the AMP project team was the lack of transparency. This has not changed as currently the Elton group has staff gathering signatures (name and signature only no contact information to see if they actually exist or where they live) at 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".

If AMP's statement that the majority of the community indeed do want this expansion, then why are gathering signatures from people without displaying the relevant detailed revised plans so that people can make an informed decision about whether they support or not. The language on the promotional material around the Metro is true to form saying 'we listened to you and now there will be a 22% decrease in proposed retail space, less car spots etc' which downplays the extent of the 75% expansion. If they were confident this is what the community want they would be saying "Great news we are expanding the metro by 75% so you can have all the retail shops you wanted!"

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. 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 and Newtown's existing Town Centres that has retail, commercial, educational, entertainment 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 Centres. 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
- that some people surveyed may in theory welcome the idea of more shopping choices at the Metro
- 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 – INCREASED TRAFFIC CONGESTION ON LOCAL ROADS



AMP's latest Traffic Management and Accessibility Plan conducted by Halcrow, used the same methodology as the previous plan. The revised plan was on the proposed increase of retail space by 75.3%. The report concluded "Subject to recommended improvements in particular the revised improvement schemes for the intersections of Bedwin Road with May Street and Edgeware Road with Alice Street, traffic effects of the proposal would be satisfactory". This report relies heavily on the Council & RTA approving the changes and does not provide a case if they are not incorporated.

According to the RTA, the current centre presently generates on the "regional roads" about 77% of the RTA rate on a Thursday evening and about 93% on a Saturday morning which means the roads are at near capacity not prior to any expansion.

Applying to the model a full discount for the reduction in space of 22% does not take into consideration the planned increase in major franchises including 2 discount department stores and another supermarket. Using the full discount still means an unacceptable increase in traffic levels of 35% Thursday evening and 41% on Saturday. If a 50% discount applies it is 55% and 46% and if the discount is not applied the traffic levels would be 75% Thursday evening and 50% on Saturday. One of the major issues now for people using the Metro is the traffic congestion of getting in and out of the car parks and the surrounding streets.

Traffix which was the consultant for Chamber of Commerce advised Metro Watch that as they were not provided with the actual modelling files from Halcrow they couldn't adequately review their accuracy. Also the proposal doesn't adequately address the goal of achieving reduced car dependence and that additional Public Transport services would also be needed so that shoppers have another option to private car usage.

The Halcrow report projects additional minimum usage of the local roads at peak hours of 365 veh/hr on Thursday evening and 655 veh/hr on Saturday. In fact Figures B5 and B10 of the Halcrow report indicate a 'Forecasted Nett Change in Traffic Flows' as follows: 447 veh/hr on Thursday evening; and 785 veh/hr on Saturday. It can be seen that these flows are substantially higher; however this discrepancy does raise issues concerning which volumes have been assessed in the SIDRA Intersection modelling.

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.

This development, which exceeds permitted density/FSR controls, has the right to basically use up any remaining capacity of the road network needs to be questioned strongly from a town planning perspective. The imposition on future development that this creates is such that any other future developments may be liable to significant infrastructure costs to maintain acceptable levels of performance on the surrounding road network (when intersections are at or near capacity, small changes in traffic can lead to much higher delays/queues - it is an exponential relationship).

No structural change to the network is proposed and the proponent relies on behavioural modification arising from congestion to limit reduction in intersection service, at this stage residents amenity is already reduced. The Halcrow report also raised the issue of other developments adding to the traffic congestion however parallel and existing new developments do not share traffic peak times with the proposed expansion.

The proponent's "improvement schemes" for traffic flow such as creating new parking restrictions for local residents to help the Metro during certain periods etc will not alleviate the issue and also will rely on the RTA and local council to agree to them as well. The changes are superficial, the facts are the streets in and around the Metro are currently congested and there is nothing the proponent can do to "disguise" or make it go away. Our local infrastructure is what it is and developers should not be allowed to go ahead and create enormous pressure on already existing infrastructure and leave the problem to the local council and the community to deal with.

Metro Watch Experience

Traffic surveys (i.e. counting the number of cars at the different intersections and the number and direction of cars leaving and arriving at the Metro car park during Thursday and Saturday peak hours) was conducted by local residents over several weeks in July 2010. The data collected showed the actual peak hour traffic flow may occur at different times than the TMAP nominated peak hours (ie Thursday night 5:30-6:30pm and Saturday 12:00-1:00pm).

Also we found there was a variance of between 10-30% greater traffic flow than reported at TMAP's nominated peak hour.

Traffic movement experiment was to understand the impact an increase in traffic would have on the local street network during peak periods. On Saturday 28 August 2010 between 11am and 1pm, 25 vehicles including bicycles were added to the existing traffic. Each vehicle travelled one of 4 pre-determined routes and this reflected a total of 220 trips and representing an increase of 156 vehicles per hour. Results: 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 at the centre were also jammed with cars unable to enter or exit through the traffic queues. That was the impact with an extra 156 veh/hr and not the proponent's minimum proposed addition of 655veh/hr.

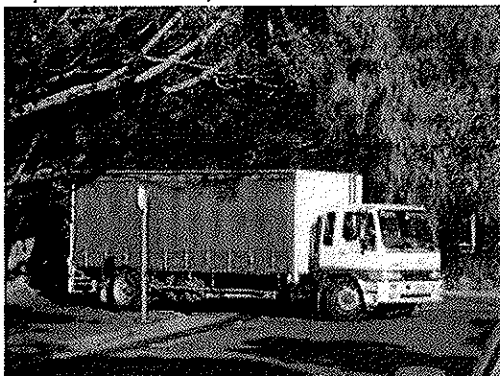
Delivery Vehicles

There will be a significant increase in delivery truck movements to the centre, to service 2 more major brands and a 3rd supermarket. We could expect a 50 – 100% increase in truck deliveries to service these 3 new major tenants (a conservative estimate, as the 3rd supermarket itself will generate 50% more deliveries.)

There are currently major issues with delivery trucks; the unscheduled times, the backup of trucks trying to unload means, illegal parking and dangerous off loading of goods from Murray Street. When one of the major supermarkets has a delivery the truck takes 3 hours to unload and other delivery vehicles have to make do wherever they can park. When I pointed out one such problem with a Metro representative, he said he couldn't do anything about it and just took my name, address and telephone number.

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 2nd 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.



Public Transport

The Metro shops are served by local roads; the train station is more than 10 min (800m) walk away. At present bus services are focused on City and Bondi Junction with inefficient routes connecting several

underserved intermediate destinations. Services to the south and west leave from the other side of Enmore Park between the corner of Addison Rd and Llewellyn St on Enmore Rd a 5min walk (400m) away.

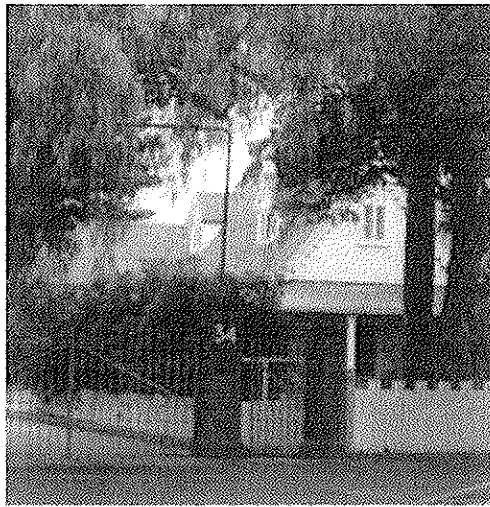
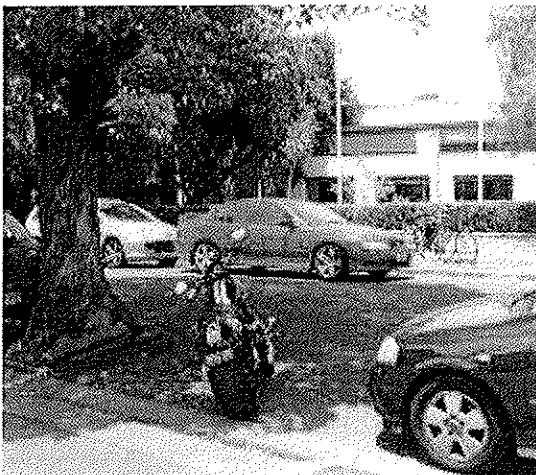
The Halcrow report claims of mode sharing towards increased use of public transport particularly bus trips should be disallowed without committed new routes to the indicated sources and sinks of trips to the south and west supported by STA and Dept of Transport. Present bus routes do not serve these locations. The proponent's solution to the PT issue is to provide a new bus shelter and terminal in Edinburgh Rd and additional bike racks and encourage employees and customers to use sustainable transport. One of the proposed bicycle improvements for Lord Street and Darley Street is to introduce "marked bicycle symbols". Obviously the traffic planners have not ridden a bike on these streets which are very narrow; cars parked either side of the road and these streets are busy through streets - certainly a health hazard for bike users.

There seems to be an ill conceived idea that people living in the Inner West do not need cars and in fact in the Pitney Bowes report it states "the majority of residents do not own cars". This may have been the case 10 years ago but the reality is most residents do own at least one car and the majority do not have off street parking.

OBJECTION – VISUAL IMPACT

This proposal -

- **is 75% bigger than the current site and the height will increase by 140% and once the mechanical plant is included it will reach a height of 20 meters from the current 6 meters.**
- **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**



Before Metro

After Metro

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.

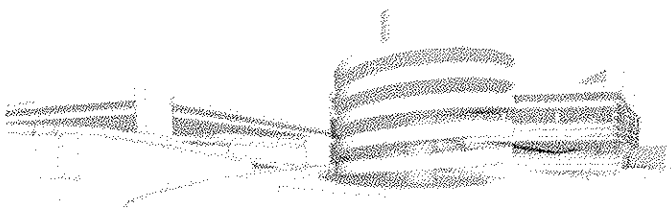
The importance of these period buildings, including the Mill House, establishes the character of the streetscape. Any proposed new built form should respond sensitively to the heritage significance, and not seek to overwhelm and dominate the landscape. The current plans though somewhat reduced and set 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 RTA in their submission to AMP dated September 2010 was concerned about the impact the development would have on the value of the properties they own and said "the approval of the Metro proposal will have a detrimental effect on the amenity and value of RTA's adjoining holding."

The revised submission in fact did take away the "corkscrew" car ramp however it did not remove the other proposed 'corkscrew' shaped ramp on the corner of Smidmore Street and Edinburgh Road which will also have an over bearing impact on the many residents who live in those streets.

The council preferred option is for a long straight ramp which it currently is. However Pitney Bowes response was "It will derogate from rather than compliment the architectural design. The corkscrew ramp design creates visual interest. While it is visually prominent, it is also located at that part of the site where there will be least impact on adjacent properties."

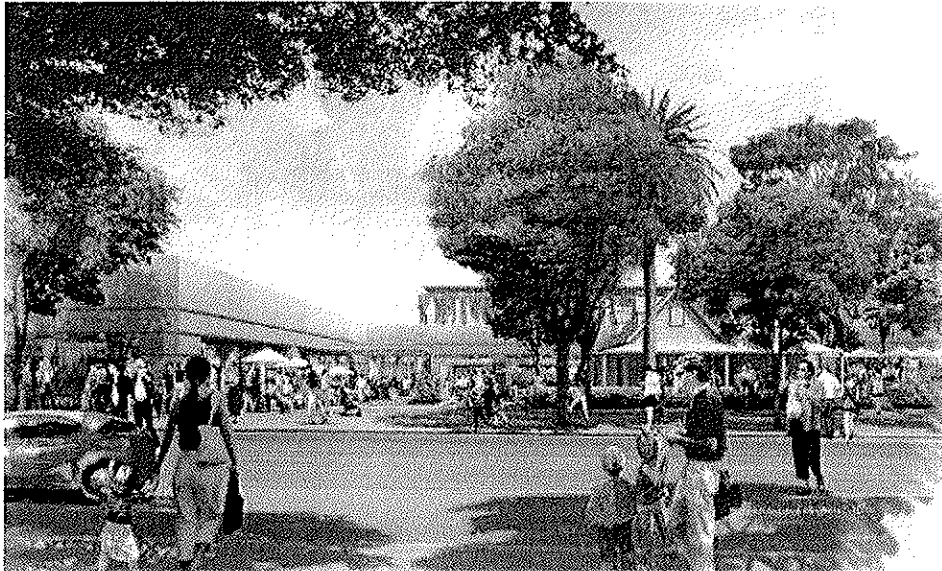


SOUTH-WEST CORNER EDINBURGH ROAD

View Bourne St cottage



The "corkscrew" ramp does nothing for the architectural design of the centre it is about saving space so that maximum floor space is available and the comment about creating a visual interest is laughable tell that to the residents who live in adjacent properties and have to look at it every day.



OBJECTION - IMPACT OF CIVIC PLACE

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 homes across the road, 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 of residents to experience quiet enjoyment of their homes nearby. 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

Metro Watch –17 March 2011

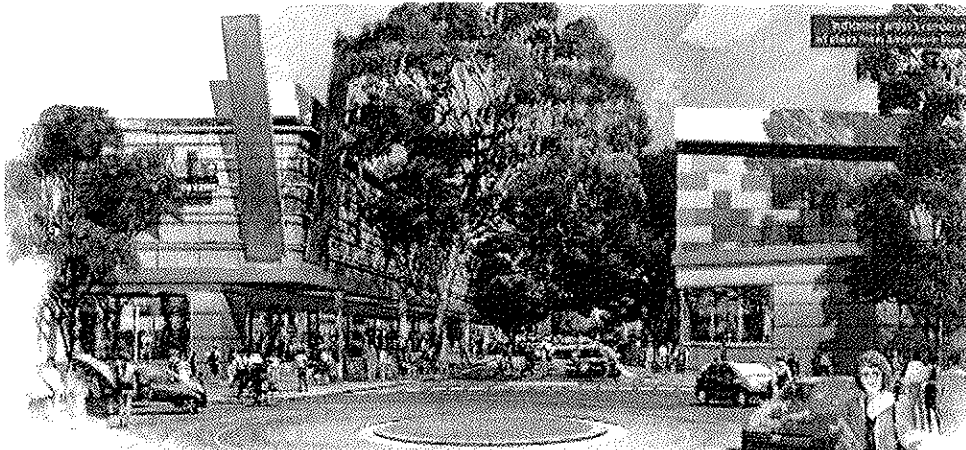
(particularly human voices) is amplified and funneled across the road in to the houses (and indeed the back yards) of the residential dwellings. Such landscaping will need to be maintained with cleaning and hosing of hard surfaces, hedge trimmers etc which will cause further noise disturbance at night/after 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**. Houses in this area are small with tiny yards therefore people utilise all areas and every piece of space is important – front verandahs and small yards are used to relax, entertain and play. When people's houses are turned into public "fishbowls" they will be denied the use of the front area of their homes, unless they want to be on public display. 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 privacy, and is a serious impact on the amenity of residents 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 HEALTHY TREES

The proposal -

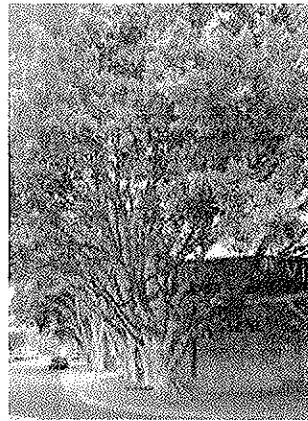
- **is insufficiently clear about which trees will or will not be removed**
- **seeks removal of mature trees of landscape significance**
- **includes potential loss of natural habitat for birds and bats**
- **may have negative environmental impact**

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." The other trees reviewed showed:

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."

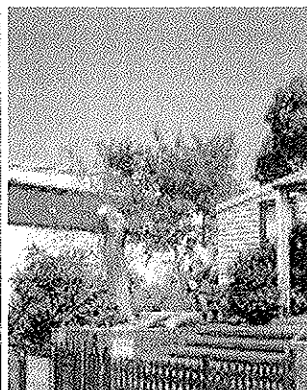
It appears from the report that any tree that may impinge on the proposed development footprint will have a very short life span. The supplied plans indicate that eighty (80) trees are proposed for retention however in the above statement only 68 trees are identified for retention and of these 47 trees 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.



Before



After

This action, and the perplexing lack of clarity in the IVM and Statement of Commitment in regard to preserving trees, does not provide confidence amongst the community 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 trees, 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."

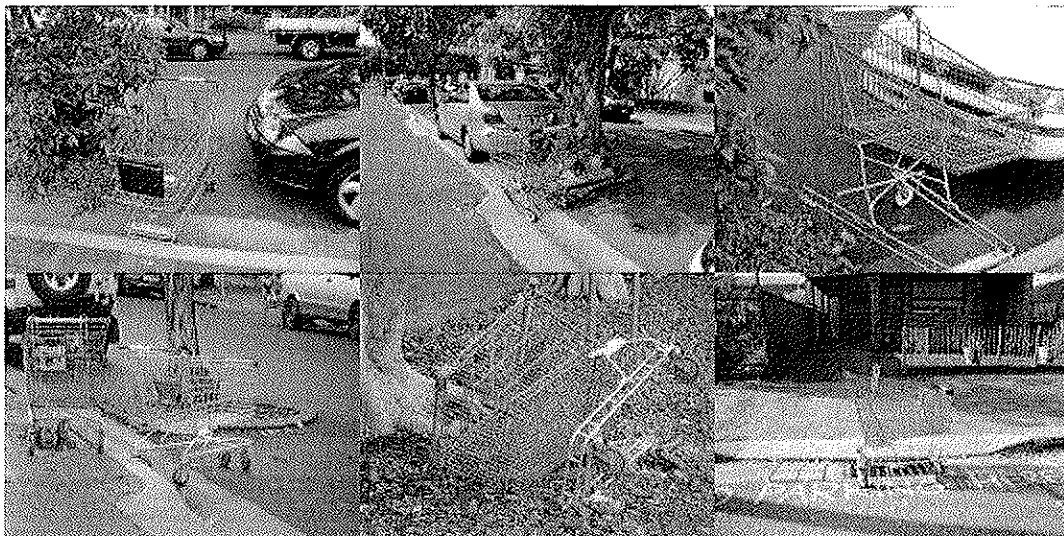
If this proposal were to be given approval, then I request the Dept of Planning to instruct the proponent to consult extensively with Marrickville Council as well as local residents (and to obtain council approval before any work commences) regarding the plans for all new landscaping to ensure the very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

The designers obviously recognise the aesthesis of the wonderful healthy mature trees currently surrounding the Metro as they have included them in their drawings and in fact show them as being the same height as the proposed expanded development. The community hope this will not be the only reminder we have.

OBJECTION – OPERATIONAL ISSUES

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



A complete detailed Operations Management Plan must be provided as soon as possible, with input from Council and local residents in order to create a reasonable set of conditions that will not unduly impact residential amenity.

This Operations Plan is essential because of the **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 (night time disturbance) etc.

The management of these issues by the Metro over the past many years has been **extremely disappointing and has led to dissatisfaction and frustration for residents**. There is concern that these issues will continue to be unaddressed and will worsen due to the expansion.

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.**

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.

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.

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.

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. On behalf of residents, Metro Watch requests that the Dept of Planning insist that, as part of a condition of approval if this is granted, that the Metro management 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 – ECONOMIC FALLOUT WILL ADVERSELY AFFECT OUR COMMUNITY

The current Metro centre's facilities serve most of the community's needs as it has 2 large competitive supermarkets, a discount store, bank, RTA, NRMA, post office, medical centre, optometrist, plenty of fresh produce vendors, numerous food outlets such as McDonalds, KFC, Subway and a host of small boutique and special interest shops. It is all on one level making it easy to navigate and get around it, which is exactly why many people from in and outside the area frequent it for some of their commodity shopping needs. It is possible to "get in and get out" if you are in a hurry, and there is also the opportunity to linger. The site does need freshening up as the owner has allowed the common areas to run down in particular the toilet facilities. They have not spent any money on it but at the same time the tenants must revitalise their stores at contract renewal.

Pitney Bowes Report appears to define the trade area for the Marrickville Metro according to whatever suits its objective. The report uses 2-2.5k as the main trade area (Marrickville LGA is much bigger than this) when discussing the lack of retail options however the majority of its existing customers are outside this area. The report then says "The defined total trade area for an expanded Marrickville Metro serves a substantial region that extends approximately 8-10 km in all directions from the centre, predominantly reflecting the low level of supermarket floor space."

The report neglected to include the Rockdale Plaza and East Gardens Westfield in their information. Both are within the defined total trade area.

There are currently 29 major supermarkets with 13 more planned and currently 14 large discount department stores with 6 more planned.

Metro Watch suggests there is in fact an oversupply of these types of stores in the total trade area unless it is the goal of the developers to have a supermarket on every corner replacing the old corner shop. These figures do not include the many smaller style supermarkets in the local shopping strips eg. Marrickville Road has 1 Enmore Road 2 and King Street has 2 with another IGA in the pipeline.

The Marrickville Metro currently has 2 supermarkets which are very profitable because they are competitively priced and consumers come from all over to shop. The main reason is Woolworths or Coles must be competitive if they have to compete in the same centre with Aldi. There is only one other centre in the trade area which has this supermarket combination.

Adding another supermarket to the mix will not make it more competitive in fact it will cannibalize not only the current supermarkets in the Metro but also impact the smaller shops such as the 3 butcher shops, deli, metro grocer, to name a few. The proponent prides itself on its community consultation however why are they adding another supermarket when this is not what the community wanted!

What all of the other shopping complexes nearby have are good public transport and major road access. Unfortunately that is not something the Marrickville Metro has or will have in the future – good public transport and main roads to service the Centre.

The report also states "A large proportion of residents do not have access to a car and rely heavily on public transport, shopping frequently for smaller goods. The lack of a 'one stop shop' retail destination in the area is not ideal for residents who do not have access to a car."

Again this statement has no substance all they need to do is to walk around the local residential streets and see how many locals have cars. Majority of residents have a least one car per household and very few have off street parking.

It is also heartening that the AMP is concerned about the amount of retail business that our local community spends elsewhere. The report states "Research of residents of the Marrickville region, previously made available, shows that about half of them shop primarily outside the area for their clothing, homewares and giftware needs, at Sydney CBD, Broadway, Westfield Burwood East Gardens and Westfield Bondi Junction."

Where the retail dollars are spent is of no relevance nor benefit to the local community nor would I think the Marrickville Council. The only group it impacts is the AMP shareholders. It is interesting to note that the area the Metro expansion is targeting is customers of other regional shopping malls.

Local Shopping Strips

Development Assessment Report # D0910 by Marrickville Council: "In the long term, investment in the conservation of the shopping strips provides far greater returns socially and economically to the Marrickville community through improved liveability, enhanced sense of place and community, and conservation of its history and heritage than a shopping mall ever could".

The proponent states the revised development would only have a - 4% impact on the shopping strips and therefore not affect their viability. However the Pitney Bowes Report also states "The following sub-sections of this report now present an indicative projection of the anticipated impacts of the smaller proposed expansion of Marrickville Metro, on competing retail facilities, both within and beyond the defined trade area. Such projections must be considered as indicative for the simple reason that it is very difficult to predict with certainty the precise impact on any one retailer or any one centre that will result from any change to the retail structure serving a particular area or region."

There is actual experience of what a shopping centre can do to local shopping strips. When the Marrickville Metro first opened in 1987 it devastated the Marrickville strip and it has taken nearly 15 years for the Marrickville strip to get back to a vibrant shopping strip. Broadway had a similar effect on Glebe Point Road which used to be a vibrant diverse shopping village; since Broadway expanded it has had to re-invent itself as a restaurant street with all the small retail shopping disappearing. Bondi Junction had major impact on the shopping strips in Double Bay and Paddington. These small retailers have very low margins and many of the strips are currently underperforming against the average, so any decrease in trade will lead to them not being viable and closing down.

Local Residents

The RTA in their submission to AMP dated September 2010 was concerned about the impact the development would have on the value of the properties they own and said "the approval of the Metro proposal will have a detrimental effect on the amenity and value of RTA's adjoining holding." This certainly must also be true of the many residents who also have properties around the Metro in Edinburgh St, Murray St, Bourne St and Victoria Road.

A retail expansion of this magnitude will have a significant impact on the commercial viability of local shopping strips and entertainment precincts. This loss of income/commercial viability is in itself, apparently, not a consideration of the Part 3A assessment process; however the loss of the diverse and interesting shops, cafes and restaurants will result in a loss of amenity to the community, as these vibrant spots are part of the essential charm and nature of this area.

AMPCI has vastly underestimated and misinterpreted the values, priorities and character of this community if they believe that by providing a bland tasteless "mall" full of generic chain and brand stores, that they will be fulfilling the needs and wants of Marrickville's and neighbouring suburbs' population



This isolated out-of-centre location is an inappropriate site for a regional shopping centre as it is a car-oriented retail destination not serviced by adequate bus routes nor is it close to rail transport and is not on a main arterial road.