

18 March, 2005

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City of Sydney
Town Hall House, 456 Kent St
Sydney NSW 2000

Re: Development at Harold Park on the site of the former Rozelle Tram Depot

1. EcoTransit Sydney has no interest in specific developments, be they commercial or residential, in Sydney. However EcoTransit Sydney has a specific concern for sustainable transport in Greater Sydney, and as such urban development policies are highly relevant to the city's transport needs.
2. EcoTransit Sydney acknowledges the need for urban consolidation in the Sydney metropolitan region in the context of the State Government's *Metropolitan Strategy* released in 2004.
3. EcoTransit Sydney acknowledges the need for adaptive reuse of the former Rozelle Tram Depot, an important historic site in inner-western Sydney.
4. There is a strong need for this development to harmonise with the character of Glebe village, within which it is to be located, and the inner west of Sydney.
5. The development proposed is for seven storeys of residential units and two levels of car parking.
6. Planning approval for this development also needs to consider the existing densities in the area immediately surrounding the site. Within close proximity to the site are medium- and high-rise developments at northern end of Glebe Point Road and adjacent streets. These include the redeveloped Blackwattle Studio apartments. Development is proposed for the Harold Park Hotel site on Wigram Road. The Princess Alexandra Hospital site on nearby Bridge Road has been turned into a series of very large blocks of residential units. All of these developments demand that adequate attention be given to the transport needs of this site and that it not further aggravate the existing high traffic congestion.
7. The strong history and heritage aspects of the existing buildings demand sympathetic design and construction on this site.
8. EcoTransit Sydney notes that there are important heritage issues at stake in development of this site.

9. EcoTransit believes that the brick façade of the former tram depot building, dating from around 1904, must be preserved and restoration of the brickwork is required. Consideration should also be given to retention of the superstructure of the former depot building to maintain the historic integrity of the site. Furthermore, at least a portion of the original saw-tooth glass roofing over the building itself should be retained and restored. This roofing would form an integral part of the proposed “tram interpretation museum”. EcoTransit further believes that the former tram depot offices on the southern (Harold Park) side of the building should be preserved. In addition to their ornate brickwork and roof tiling, these buildings contain various unique features such as the steel spirals protecting the windows. The cast-iron water tower on the eastern edge of the site also needs to be closely examined for its heritage implications. Bearing these and other heritage considerations in mind, EcoTransit believes that the opportunity exists for adaptive reuse of the site whilst still maintaining the historic integrity of the site. An appropriate example of sympathetic adaptation and reuse of an historic industrial site is the old Eveleigh Railway Workshops, which is now the Australian Technology Park. Other notable examples of sympathetic reuse of historic industrial sites include the Finger Wharf at Woolloomooloo; the former freight wharves at Walsh Bay, which are currently used by the Sydney Theatre Company and for new residential development; and the former Pier One, which was used as a restaurant, entertainment and shopping complex in the early 1980s. In all cases, the façade and superstructure of these buildings have been retained in order to maintain the structural and historic integrity of the sites.
10. EcoTransit Sydney notes that there is currently a separate DA before council relating to the current stabling facilities on the Harold Park Paceway site.
11. The current development proposal for the site is unacceptable for several transport-related reasons.
12. The proposal for 222 car parking spaces, over two levels plus external parking, is unacceptable for the proposed 122 residential units. This figure has been drawn from the developer’s interpretation of provisions of the ‘Leichhardt Town Plan’ (The Leichhardt *Local Environment Plan 2000* and *Development Control Plan 2000*).
13. As a matter of general principle EcoTransit Sydney does not believe that large scale residential developments should exceed a 1:1 ratio in terms of car spaces per dwelling.
14. This general principle is then further affected by the location of surrounding infrastructure including public transport services and their proximity to the site.
15. The *Assessment of Traffic and Parking Implications* for the site, prepared by Transport and Traffic Planning Associates, is limited in its objectives.
16. In the Introduction to this report its purpose is stated in terms of the existing road network, traffic conditions, parking provisions and potential traffic implications. Sustainability in terms of transport systems is not referred to.

17. However not even these objectives, in the brief discussion of motor traffic impacts and congestion, can be met through such an excessive provision for car parking spaces. These objectives can only be achieved by reducing the total number of car spaces so as to minimise local traffic impacts.

18. Public transport services are briefly referred to as part of '3.4 Transport Services'.

19. EcoTransit Sydney notes that the north-east corner of the development is less than 10 metres from the Jubilee Park Metro Light Rail (MLR) stop. This is a transport service that operates with excellent service frequency and reliability, and requires much greater attention in this development.

20. The *Assessment of Traffic and Parking Implications* makes only brief reference to the MLR stop:

“The light rail system which runs between Central Station and Catherine St, Lilyfield, operates frequent services and the Jubilee Park Station is located only a short distance from the site.”

Nothing further is added.

21. It should be noted that this development is *immediately adjacent* to the MLR station. The MLR can be used to access the CBD via Pymont Bridge, and greater Sydney via Central Railway Station.

22. The *Assessment of Traffic and Parking Implications* also makes brief reference to STA bus services.

23. The report only refers to the 432, 434 and 431 services, and incorrectly states that these run to Central Station. In fact all of these buses run the full length of George St, terminating in The Rocks.

24. The report makes no reference to other bus services. For example the 433 bus service, that also runs along the Crescent/Glebe Point Road/George St, is omitted. The 370 bus service from Leichhardt to Randwick, via Newtown, runs along Wigram Road just a short distance to the south of the site, and is not referred to. This service allows locals access to the employment centres of southern Sydney as well as Sydney University and the University of New South Wales.

25. The combination of these services means that the site is particularly well served by public transport both in terms of frequency and reliability.

26. The *Assessment of Traffic and Parking Implications* dramatically understates existing traffic congestion near the site. Traffic data supplied by the RTA in 2002 is used to state that

“Traffic conditions in the vicinity of the site are generally quite satisfactory although there are delays on the City West Link road to the north causing some northbound queuing on the Crescent during the afternoon peak period.”

27. EcoTransit Sydney disputes this finding. Traffic congestion in the area does not even resemble the benign situation described by the *Assessment of Traffic and Parking Implications*.

28. The first traffic finding is that:

“the results of this assessment indicate that the existing access intersection (Chapman road/The Crescent) *will continue to appreciate quite satisfactorily* with the additional traffic generation resultant to the proposed development scheme.” [italics added]

This begs the question of when traffic congestion becomes ‘satisfactory’.

29. The second traffic finding is that:

“While the proposed development will generate some additional traffic movements on the Crescent access route it is noted that:

- these movements will be *quite minor in nature* ...; and
- the additional traffic generated in the afternoon peak will be *largely inbound* and will not add to the congestion on The Crescent and the City West Link road.”

[italics added]

The suggestion that traffic congestion loses that character when the traffic is inbound to the development is outrageous.

30. There are lengthy queues on The Crescent and Minogue Crescent during peak periods. Congestion is considerable on Bridge Road and other feeder roads in the area. There is daily gridlock on the City West Link that feeds directly into The Crescent. Johnston Street in Annandale, connecting with The Crescent, is approaching capacity during the morning peak period. Congestion on the Anzac Bridge and Victoria Road also has major implications for development of this site. This significant congestion cannot be ignored or downplayed.

31. The conclusion of the *Assessment of Traffic and Parking Implications* is equally curious. “Adoptive [sic] reuse of the tramshed building will instil life and vitality to the site”.

32. The conclusion is the first occasion where “good access to public transport services” for the site is referred to.

33. The primary objection of EcoTransit Sydney is to the first conclusion, namely that “the proposed parking provision for the site is adequate and suitable.” The reasons why EcoTransit Sydney believes this to be inappropriate have been documented above.

34. The second and third conclusions, that “the proposed vehicular access arrangements will be suitable and effective” and that “there will be no adverse traffic implications” from the development, simply beggar belief.

35. EcoTransit Sydney believes that the *Assessment of Traffic and Parking Implications* is seriously flawed. As such a development of this size cannot proceed on the basis of transport studies that do not pay adequate attention to surrounding transport systems.

36. EcoTransit Sydney believes that, at a minimum, the development needs to dramatically reduce its provision of car parking spaces to less than half of that proposed.

37. EcoTransit Sydney also believes that the opportunity exists to explore alternative transport arrangements.

38. There will be some commercial office space as part of the development.

39. There has been no further exploration of transport alternatives for the site.

40. The DA does not mention The City of Sydney’s forthcoming bicycle plan or the utility of bicycles as a viable transport alternative in the inner city.

41. The DA makes no mention of the possibility of car-share organisations to satisfy the mobility needs of residents. As noted above there is provision for commercial use of the site and the City of Sydney needs to fully investigate the possibility of ‘car-share’ arrangements. Council is referred to the recent report, authored by Rolf Bergmaier and others, that was commissioned by the Australian Greenhouse Office on the concept of car share organisations. A copy of this report can be found at:

<http://www.greenhouse.gov.au/tdm/publications/pubs/carsharing-dec04.pdf>

42. Notwithstanding the excellent provision of public transport services in the immediate vicinity of the site, the DA documents make no reference to the possible promotion of the purchase of periodic public transport tickets.

43. EcoTransit Sydney wishes to be informed of when this Development Application is to be considered by council. Please contact the EcoTransit Secretary Matthew Doherty on 9280 0250 or email uncarved_bloc3@hotmail.com