



ARAG Response to

The Parking Study for Alexandria Area Adjacent Australian Technology Park

1 May 2012

executive summary

Background

The Parking Study for Alexandria Area Adjacent Australian Technology Park was commissioned by the management of the Australian Technology Park Precinct Management Limited (ATTPML) and released on 3 November 2010.

The stated purpose of the Study was to:

- 'Assess the parking conditions in the local streets (adjacent to the ATP site)
- Develop a Draft Parking Plan for the area and seek community comments on this plan and
- Following consideration of community comments finalize the Parking Plan and submit this to the City of Sydney Council for their consideration and implementation, appropriate.'

On 14 September 2011, at a meeting of the Alexandria Residents Action Group (ARAG), it was agreed that ARAG would provide the City of Sydney Council with a review outlining the objections residents have to the use of the *Parking Study for Alexandria Area Adjacent Australian Technology Park* by the City of Sydney Council as the basis for the Council's consultation for parking changes in Alexandria.

Objections

ARAG's objections to the Australian Technology Park's (ATP's) Parking Study are:

- The purpose of the Study does not address the source of the problem – the construction within the Australian Technology Park of the Channel 7 Building (8 Central Avenue), with no provision of acceptable parking for 2000 employees.
- The scope of the Study does not include the precinct of the ATP. The ATP's streets, empty car parking sites and vacant land are excluded. (The agreement that the ATP precinct would be excluded from the Study was made between the ATP and the City of Sydney Council. Residents were not consulted and were not a part of that agreement.)

- The methodology used for the community consultation process required residents to lodge written submissions. This process did not allow people to participate or respond in other meaningful ways (open discussions at community meetings prior to the commencement of the Study, focus groups, surveys, etc.). Nor did it take into account that many residents feel intimidated about preparing submissions and may not have the writing or computer skills to participate in this manner.
- The request by the Alexandria community for a broader methodology to be employed for a community meeting **before** the commencement of the ATP's Parking Study in March 2010 was rejected. The result of this was that it was only when the *Draft Parking Study* was presented at the ATP/Redfern Waterloo Authority's (RWA's) Community meeting on Monday 9 August 2010, that the community become aware that the precinct of the ATP had been totally excluded from the Parking Study.
- The text of the Study makes little reference to the fact that the majority of submissions from residents (before and after the community meetings in December 2009 and August 2010) strongly recommended that the ATP provide parking for its employees and tenants within the grounds of the ATP. Instead, the focus of the Study is solely on the streets of Alexandria.
- The collection of evidence for the Study does not make reference to the dates of the large numbers of complaints lodged by residents with the ATP, RWA and the City of Sydney Council over the past three years. Complaints from organizations such as Redwatch, local agencies and businesses concerning the problems associated with ATP employees and tradesmen parking in nearby streets are neither recognised nor acknowledged.
- The critical analysis methodology used in the Study is not founded on problem-solving principles to identify constructive solutions.
- No consideration is given to that fact that the recommendation of the Study for restricted parking will not address or resolve the initial problem.

As the only solution recommended, restricted parking will impact local workers and the ATP employees, but also will impact residents, their families and visitors.

- In most cases the sources from which statements in the Study have been drawn are not supplied; for example, the stated ATP target of '70% non-car mode of travel to work'.

- While that example may have come from ATP Planning documents, the Study makes no reference to either the ATP's *Built Environment Plan (Stage One)* 2006 or the *2005 Master Plan*, especially the *4.2.10 Car parking Action*. If the example was taken from that section of the *2005 Master Plan*, the Study neglects to mention that the proposed Transport Review Group responsible for achieving the desired 70% non-car mode was never convened. The Annual Transport Survey of employees as a basis for identifying the non-car mode of travel was never conducted.
- Reference is made to a '*limited pilot travel survey of staff of employees of ATP tenants*' in the Study, but no details or information are provided on the extent and timing of the survey, who conducted the survey nor how ARAG can gain access to the survey and results.
- The recommendation of the ATP Parking Study of restricted parking with Parking Permits for residents had already been offered (and rejected) to residents in local streets in 2008 before the construction of the Channel 7 Building (8 Central Avenue). The Study is not recommending anything more than what already existed, and exists, for residents under the current Parking Policies of the City of Sydney Council.
- While we believe the parking counts were done in good faith, there is a possible 20% understatement in the Study of the number of cars parking in our streets during business hours.
- In spite of the parking conflict from the construction of the last building to be built within the ATP, the Channel 7 Building (8 Central Avenue), the Study makes no reference to the additional buildings planned for the ATP precinct nor the possible future social and environmental impacts with regards to parking and how those impacts are to be managed.

For ease, the section numbers referred to in this document are a direct reference to the section numbers in the '*Final Draft Parking Study for Alexandria Area Adjacent Technology Park*' dated 3 November 2010.

ARAG Recommendations

ARAG on behalf of the residents of Alexandria strongly recommends the following:

- The limited pilot travel survey of ATP employees of the ATP tenants be superseded by Annual Travel Surveys as recommended in the Master Plan 2005 and by the Department of Transport.
- A Travel Plan Co-Ordinator be appointed by the ATP to conduct the annual surveys of employees to identify travel work modes and strategies to encourage less dependency on car travel and more use of public transport, cycling and walking to work where possible.
- A Transport Review Group (TRG) for the ATP be created to support the work of the Co-Ordinator in identifying travel work modes and strategies to encourage less dependency on car travel.
- The TRG must include local community representatives as well as the original representatives from the ATP, City of Sydney Council, Rail and Bus Departments.
- Under the recommendation in 2005 Master Plan 4.10.2 Provisions e), the vacant area of 260 car parks in front of the Channel 7 Building (8 Central Avenue) be opened on a temporary basis for employee parking.
- Before any future development occurs in the ATP, a Social Impact Assessment is prepared for each proposed building.
- The scarcity of permanent parking within the ATP be re-examined in light of the reality that local streets car spaces are full and no longer have the capacity to take the overflow from the ATP with new developments.
- The problems preventing use of public transport in the Redfern Waterloo Alexandria area which includes:
 - Perceptions that Redfern is an unsafe area and that Redfern station is dangerous
 - That local buses run regularly and frequently

be addressed with the assistance of the local community and support of the Sydney Metropolitan Development Authority as a priority

- The City of Sydney Council manage and address immediately any adverse impacts of a residential parking scheme, if such a scheme is implemented.
- The residential parking scheme must include the provision of visitor parking.

Section - 1.0 Introduction

The document claims that the Study was initiated following a community meeting held on Tuesday 15 December 2009, where parking issues in the adjacent streets to the ATP were raised by residents and members of the local community.

In actual fact, what is not mentioned in the Study is that since early 2009, a series of contacts had occurred between the CEO of the Redfern Waterloo Authority (RWA), Mr Roy Wakelin-King and the residents from Lyne Street, Alexandria.

Months before the December community meeting, the parking and light pollution issues had been raised with Mr Wakelin-King and the ATP through informal meetings, letters and phone calls from residents.

Large numbers of complaints from local residents and businesses had been sent to the RWA and ATP from Kingsclear, Henderson, Alexander, Dadley and Suttor streets. The complaints expressed the frustration of residents, local agencies and businesses with the parking problems that had arisen with the influx of cars belonging to tradesmen working on the construction of the Channel 7 Building (8 Central Avenue).

That so many of the letters were not answered had become an issue in itself.

Initial contact in person was at a Redwatch meeting mid-2009 between Mr Roy Wakelin-King, an invited speaker, and two angry Alexandria residents who had only recently discovered that the height of the Channel 7 Building (8 Central Avenue) had been increased from six storeys to eleven.

In addition, the high proportion of tradesmen's vehicles flooding into their street and often causing damage to their properties and cars were raised as legitimate concerns.

The tradesmen were quite open about the fact that they were parking locally in the streets, as they were not prepared to pay for parking in the ATP.

At the Redwatch meeting, Mr Wakelin-King, on behalf of the General Manager of the ATP, and the RWA Community Relations Manager, accepted the residents' invitation to visit Lyne Street to view for themselves the impact of the increased number of cars and the possible effects of light pollution from Channel 7 (8 Central Avenue).

During the visit, Mr Wakelin-King stated quite clearly that he would solve the problems relating to the cars and lights. He committed to actions being initiated to resolve the parking matter and that a series of regular community meetings would be arranged by the RWA/ATP.

In essence, the statements in the Introduction to the Study do not:

- Include the history of contact between residents and the Executive of the ATP and the RWA.
- Reflect what occurred prior to the ATPPML undertaking the ATP Parking Study.
- Honour the agreement made; the Study does not resolve the parking issues for residents and local workers, nor have regular community meetings been held.

Section 2.0 Study Area and Objectives of the Study

Section 2.1 - Parking Study Area

City of Sydney Council

Numerous letters from the Lord Mayor, City of Sydney Council to residents since 2009 have made the Council's position clear and highlighted their lack of involvement in creating the parking situation in Alexandria. In letters from 2010 and 2011 respectively, it was stated that:

- 1) The City of Sydney did not approve the development – the Redfern-Waterloo Authority was the consent authority for the Australian technology Park (ATP) site and the Minister for Planning approved the Channel 7 studios and office complex. In its submission to the Minister, the City recommended that any approval include conditions to discourage tenants using local streets to park.
- 2) The City of Sydney made a submission to the State Government expressing the concerns of the residents about the impact of parking in residential street streets, however the concerns were not incorporated into their parking design. Further, as the City was not the consent authority, they are unable to enforce conditions of consent, including those about ATP's onsite parking arrangements.

Yet, as mentioned in the opening paragraph of this section in the Study,

'The extent of the parking study area was determined in conjunction with offices from the City of Sydney Council and following a review of the road network and parking conditions adjacent the ATP site.'

The Council's involvement in establishing the parameters for the Study by excluding the whole of the ATP precinct, instead of helping to resolve the situation effectively, prevented any constructive solutions being found that resolved the problem for all parties.

This raises the following queries:

- In spite of the number of complaints Council staff and Councilors had received from residents and ratepayers, why did the City of Sydney Council agree to exclude the ATP precinct from the Study?
- What was the basis for that agreement?
- Why did Council not insist that the reasons for the choice of transport to and from work by tenants and employees of Australian Technology Park be provided and analysed?

The City of Sydney Council may not have jurisdiction over the ATP, however the question remains.

If the Parking Study is intended to stand as a genuine analysis in identifying solutions to the parking situation, why are both the areas, Eveleigh (ATP) and Alexandria, not the subject of the Study, jurisdiction or no jurisdiction?

The ATP/RWA and the City of Sydney Council, by excluding the ATP area and not stating the reasons for the exclusion, appear to be most reluctant to acknowledge when and what triggered the parking problem.

The residents of Alexandria have no such hesitation. Through experience on a daily basis, they know when the problem began. They know that the ATP **is** the prime source of the problem.

Scenario for illustration

It is as if the ATP is a dam seriously leaking water.

The water is flooding constantly into nearby streets. Instead of searching for the leak and managing the repairs, the owners of the dam, the RWA and the ATP, with Council's assistance, are recommending that residents build levees in the streets closest to the dam.

The reality, of course, is ignored. If the only action taken is to build levees based on Council policies, the water may be blocked in those streets but will flood into streets further away, creating the same havoc there.

Meanwhile, water keeps on leaking from the dam. The residents keep on being blamed for not moving with the times and accepting the watery change to their environment.

Dates of complaints about parking overload

If the traffic consultant had any doubt to when the flooding of the local streets with tradesmen, and then employees' cars, began, the fact could have been established with relatively ease.

Records will show the dates when the first complaints in letters and emails were made.

Unfortunately, the complaints to the Lord Mayor, City of Sydney, and to the Council's Traffic Engineer Unit appear not to have been collated.

On the other hand, according to an email from the Sydney Metropolitan Development Authority on Thursday 29 September 2011, RWA does have a record of all the objections lodged with them.

The Study, in essence, fails to emphasize the view of so many residents contained in the complaints and then later in submissions; that the cause and solutions of the parking problem in Alexandria predominantly lies within the ATP.

The view is neither explored nor discussed in the body of the Study document. Only at the conclusion of the Parking Study, almost, as an afterthought on page 21, is it noted that:

'...a large number of the submissions received in both stages of the Community consultation expressed the view that the ATP should do more to accommodate tenant parking within the ATP site, either through price mechanism or other incentives that encourage other transport means rather, than rely on the street parking controls, in the wider area.'

Omission of details about parking spaces in Channel 7 Building

As another example of the Study's reluctance to venture down a particular path, the specific numbers of the parking spaces in and around the Channel 7 Building (8 Central Avenue) are not identified nor numerated.

In fact, the Channel 7 Building is barely mentioned at all (see 2.3).

The obvious conclusion is that in the end, what is omitted in the ATP Parking Study becomes more significant than what has been included.

Section 2.2 - Study Objectives

The stated purpose of the Study was to:

- *'Assess the parking conditions in the local streets (adjacent to the ATP site)*
- *Develop a Draft Parking Plan for the area and seek community comments on this plan and*
- *Following consideration of community comments finalize the Parking Plan and submit this to the City of Sydney Council for their consideration and implementation, appropriate.'*

Up until the Study was released late 2010, residents had believed that the RWA was initiating the Study in a sincere attempt to address the impact caused by the increased number of cars in the community of Alexandria.

The narrowness of the Study would suggest that this was not wholly the case.

By restricting the purpose of the Study, the initiators of the Study:

- Prevented the identification and analysis of the source of the problem; the emphasis is on local streets.
- Prevented the focus falling on the building of Channel 7 (8 Central Avenue) with its minimum parking for 2000 employees; the majority of whom had free parking at their previous Epping work location.

No transition plan of any worth was implemented for the move from Epping in contrast to the manner in which Optus and a photography agency, now established in Alexandria, planned and managed such a move for their employees.

- Prevented the breadth and scope of the parking issues and the current situation in Alexandria being investigated fully.
- Prevented the development and implementation of practical solutions by the ATP in conjunction with its tenants that might resolve the parking situation for local residents, businesses, agencies, churches, and for the local workers and the employees of 8 Central Avenue.

By limiting the purpose, the focus and the scope of the Study, the writer of the Study's Brief and the consultant have directed the onus for accepting changes solely onto the local community.

ATP/RWA escapes any responsibility for implementing solutions or managing the situation.

Section 2.3 - Australian Technology Park (ATP)

Included or Excluded?

Residents only became aware of the limited focus of the Study on reading the opening paragraph of this section 2.3 of Draft Parking Study when it was released.

'While the Australian Technology Park (ATP) is not the focus of this parking study background information is provided in this section about the existing and future planning for the ATP.'

The confusion and lack of understanding of the specific details of what areas were included or excluded was the result of the phrasing of a letter sent on 1 March 2010 to residents by the ATP.

The letter outlined the commencement of the Parking Study for Alexandria

'I wish to advise that we have appointed a parking consultant to assess the current situation regarding parking around the ATP and to consider appropriate strategies for the management of the matter.'

Not until 9 August 2010 at the ATP/RWA Community meeting did most residents discover, to their fury, what the true scope and focus of the ATP Parking Study were.

Once an Overhead of a map of the Alexandria from the Draft Study was presented, it was obvious that 'around the ATP' in real terms meant that the precinct of the ATP had **not** been included in the scope of the Study.

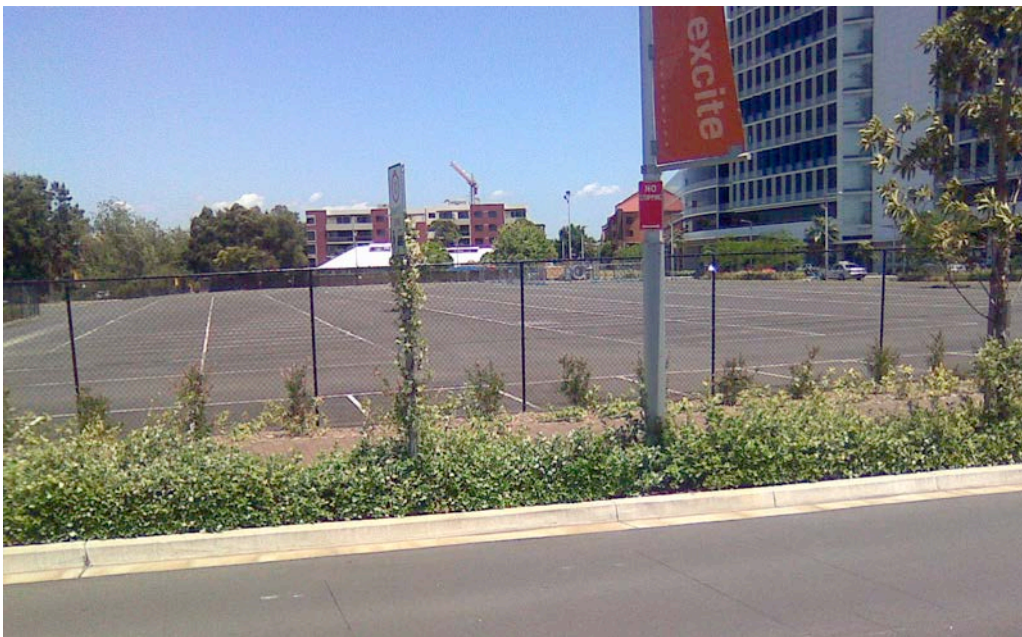
Lack of numbers given

What residents also discovered when reading section 2.3 of the Study was that while the number of parking spaces in the whole ATP site was outlined generally, no mention was made of the specific number of car spaces inside the Channel 7 Building (8 Central Avenue) or in front of the Building.

If the author of the document *Statement of Environmental Effects: Application for a licence to use the approved studios and associated runway area as a Place of Public Entertainment, July 2009*, prepared for global Television Services and Channel 7 by Architectus Sydney Pty Ltd was able to list the number of parking spaces in the Channel 7 Building (8 Central Avenue), why were the same numbers not included in the ATP Parking Study?

'The site (Channel 7 building) comprises 697 car parking over two basement levels. In accordance with the original concept plan approval, 347 of these spaces shall be of use of the tenants and occupants of the building, whilst 350 shall be provided to the landowner (ATP/RWA) for uses associated with the other buildings at the ATP and for visitors.

It is considered that on-site parking will be sufficient to cater for the public (studio audiences) as not all studio audiences will drive, some will catch public transport (bus and train) and car-pool together. This assumption was incorporated into the concept plan approval.'



MOSTLY UNUSED CAR PARK – 8 CENTRAL AVENUE (ATP)

Assumptions re Redfern Station and bus transport

It is interesting to note the word 'assumption'. Assumptions regarding Redfern Station and the bus transport infrastructure were incorporated in the concept plan and other documents prepared for the ATP.

However, the assumptions were based on:

- Redfern Station being upgraded
- That the area had very good local bus services and
- The majority of employees travelling to the ATP would access Redfern Station.

The reality, on the other hand, is:

- The upgrade of Redfern station has never eventuated, in spite of being lauded in every ATP planning document and most RWA and ATP Annual Reports for a number of years.
- A letter on 2 September 2010 from John Robertson, Minister for Transport to the Premier Kristina Keneally, regarding the routes of local buses 308 and 355, the excellent local bus services are described as 'daytime shopping services' and the service frequency reflects this.
- RWA's own community research on various projects in Redfern has demonstrated that people from outside the area perceive Redfern, and especially Redfern Station, as unsavory and unsafe.

Safety

In March 2011, a Channel 7 employee sent a letter to ATPPML Management Eveleigh, (copies were sent to the Traffic Engineer at City of Sydney Council and to residents through Redwatch).

The letter from the unnamed employee was in response to an unsigned letter from ATP Management, which had been left on cars in the local streets earlier in March 2011.

An extract of the letter is detailed below:

'... Both the workers at Global/Seven on the ATP site and the residents in surrounding streets are the victims here of corporate greed. If you were seriously concerned about the impact this site is having on our neighbours' streets you would open and utilize the locked and empty, 260-space car park sitting in front of the Global/Seven building. You would not be charging hundreds of dollars per month for your on site car parks and the operators of the multi level car park that sits, mostly empty, under the Global/Seven building would open it for general use by the building's occupiers. But no, you have sought to extort money from

us - workers who have been transplanted here from operational sites elsewhere in Sydney where free parking had been provided for more than forty years.

Many of us in the Global/Seven building are young women; many are onset TV crew working 12 hr. days starting and finishing in the dark; many carry equipment and armfuls of confidential materials to and from work. Public transport to a station in one of the most unsafe areas of Sydney is not an option.

Our employers have failed in their duty of care and to compensate us in this regard, you at ATP are seeking only to make money out of the situation.'

Omissions

While the numbers of car spaces inside and outside the Channel 7 Building (8 Central Avenue) are omitted from the Study, the issue of safety influencing the mode of transport chosen by workers at the ATP also does not rate a mention.

In addition, there is no other important numerical information and facts that would underpin the identification of the solutions to the parking situation:

The following facts and information were not included:

- 2000 employees were moved into a Building that has 347 car spaces available, for a fee, to the employees and executive of the Building.
- Many of those employees had access to free parking in their former work location.
- 350 of the 697 car spaces in the Channel 7 Building (8 Central Avenue) were allocated to the other ATP tenants, not to the employees working in the building.
- According to a RWA Planner in 2009, the allocation of parking in the Channel 7 building (8 Central Avenue) was allegedly an arrangement between the owners of the building, Allen Linz and Channel 7, and the ATP/RWA and Department of Planning. It is believed that this arrangement was made to compensate for an increase in the floor space ratio in the building.

70% non-car use

In Section 2.3, the Study claims that the:

'current transport practice for the ATP is to encourage journey to work and business trips by public transport use with a target set of 70% for non-car use journeys'.

Because no reference document for that percentage is cited, it is not clear whether the 70% was quoted from the *Traffic Report Proposed Development of the ATP Eveleigh* prepared by Mason Wilson Turney for the Sydney Broadcast Property Pty Ltd released on 22 August 2006 or from the *Australian Technology Park, Eveleigh 2005 Master Plan Redfern Waterloo Authority*.

Taking into account the current situation in Alexandria, what is apparent is that the target of 70% is, at best, aspirational.

In the *Traffic Report* (section 2.7 Mode of Travel) it states that:

'Surveys of staff at the ATP (in 2002) established that some 45% were car drivers for the journey to work and some 55% were non car borne – the majority of which (42%) travelled by train.

A Transport Management Plan (TMAP) was prepared to help increase the proportion of non car borne travel mode through restriction on parking supply, increased information on existing bus/rail services and the provision of safe/convenient pedestrian/cycle connections to public transport modes.

The TMAP has a target journey to work modal choice at the ATP of 30% car borne and 70% non-car borne.

A planned upgrade of Redfern Railway station will significantly add to the attractiveness of the use of existing high frequency rail services.'

Disregarding the comment about 'planned upgrade', the 70% non-car borne mode is disputable.

In a letter on 10 March 2011 from the Department of Transport, Mr David Hartmann, Acting Manager Transport Planning to Mr Roy Wakelin-King CEO of RWA regarding the document *Built Environment Plan 2 for Redfern Waterloo*, Mr Hartman challenges the lower figure of 60%.

'TNSW supports the adoption of a high non-car mode share target. It is understood that a 60% mode share to non-car modes is proposed. However, further modeling analysis is needed demonstrating how the

target can be achieved....In particular, TNSW requests that the following matters are addressed:

- *Provide a greater understanding and analysis of the origin and destination mode*
- *Clarify how a 60% mode of share can be achieved as an average across the ... precinct.'*

Like Mr Hartmann, the residents of Alexandria would appreciate if the Managing Director of the ATP could provide evidence on which this claim of achieving mode targets of 70% non-car use journeys to work in the ATP is based.

In the *Traffic Report*, as quoted above, an ATP staff survey conducted in 2002, estimated that '55% of staff were non car borne'.

Alexandria residents would be most interested in what strategies the ATP employed to achieve an increase of 15% in non-car mode travel to work when the evidence in the local streets proves otherwise.



HENDERSON ROAD

ATP Master Plan 2005

Possibly, the other source of the Study's statements of the 70% non-car mode goal was the ATP 2005 Master Plan.

This Master Plan is of particular interest to residents, mainly because there is little doubt that, if the Action - 4.10.2 Car parking section of the Master Plan, had been implemented, the ATP target of 70% non-car mode use was achievable.

Unfortunately, for so many people over the past four years, that was not to be. The 4.10.2 *Action* was never implemented.

Section 4.10.2 *Action Car parking* details that:

- *'A 'Transport review group' shall be established and facilitated by the ATP/RWA*
- *The transport review group shall comprise at least the following: the owners of the Master Plan site (RWA); Sydney City Council; RTA; STA & SRA.*
- *The transport review group shall determine the parameters and timeframe for an annual transport survey within 2 months of the adoption of the Master Plan to the satisfaction of the Consent Authority*
- *The transport review group shall review the annual survey (to be undertaken by the owner of the Master Plan site....) to confirm the actual modal share being achieved at the ATP.*
- *The transport review group shall undertake the following tasks:*
 - *Review all transport initiatives being implemented to achieve a modal split, on site of 70:30 public to private transport (employees and visitors combined). Such initiatives to include Redfern Station upgrade; car pooling; car park management; residential parking scheme; the opportunity and desirability of integrating bus services into the Master Plan site;*
 - *Provide advice to the consent authority on all DA's with significant traffic implication matters;*
 - *Identify other government agency actions required; and*
 - *Review the capabilities and loadings of relevant junctions to provide advice on phasing of infrastructure and development.*

NOTE: It is acknowledged that the above transport issues are not wholly within the control of the owners of the Master Plan Site and will require partnerships between various agencies to implement the Master Plan.

- *Traffic and parking conditions are to be reviewed by the ATP when occupied GFA within the ATP reaches 120,000 m². At that stage, the impact on neighbouring areas is required to be monitored and ameliorating measures inside the Master Plan area taken as necessary.*
- *The ATP is to liaise with Sydney of City Council on measures necessary outside the Master Plan areas.'*

It is also interesting that only when the GFA reaches 120,000 m² does the ATP envisage that it will take '*ameliorating measures inside the Master Plan area*'.

The GFA currently falls way short of the 120,000m². The residents are already heavily impacted by the traffic and parking conditions.

BEP1 and Transport Review Group

With regards to the Transport Review Group (TRG), the excuse was made that the TRG was never convened because the *Built Environment Plan (Stage One) August 2006* (BEP1) over-rode the ATP 2005 Master Plan.

BEP1 rendered the Master Plan invalid (email from Mr Roy Wakelin-King on 20 December 2011). Our understanding is

- As with previous Master Plans, one Plan is built upon the foundation of the previous Plan.
- A planning control document such as the Built Environment Plan (Stage 1) usually comes before a Master Plan, not after as happened with the ATP and the Channel 7 Building.
- A Master Plan and a Planning Control document are two entirely different types of documents.
- A good strategy always remains a good strategy, especially when dealing with persistent transport and traffic issues.

The *Built Environment Plan (Stage One) August 2006* contains no equivalent strategies to those of the 2005 Master Plan to address issues of transport and car parking at the ATP.

What the *BE Plan* does discuss in detail, yet again, is the necessity for the upgrade of Redfern station.

'Any proposed redevelopment of the RWA's strategic sites (including the ATP) must be matched with improvements to Redfern Railway Station and associated key destinations in the Redfern-Waterloo area. This is reinforced in the Metropolitan Strategy where upgrading the station is seen as a key initiative to providing better services for future development.'

If 4.10.2 Action Car parking in the ATP 2005 Master Plan was invalid with the remainder of the Master Plan in 2006 as claimed, why then did Mr David Hartmann, five years later in 2011, in the Department of Transport letter, as above, recommend for Redfern Waterloo

'The proposed development precincts are within walking distances to high quality public transport and represent a significant opportunity for travel demand management. TNSW recommends that as a part of a package of measures the opportunity to engage a travel co-ordinator to prepare information guides and plans such as Workplace Travel Plans and Travel Access Guides is considered.'

Travel Plans and Staff Surveys

What the ATP Master Plan recommended in 2005 was exactly the same strategy without the label of 'Travel Plan'.

The Action proposed annual staff surveys to establish modes of travel to work, strategies to encourage use of car pooling, car share, public transport, cycling, etc.; the basis for developing Workplace Travel Plans for the ATP.

With regards to staff surveys, according to the research available, the last transport survey of employees at the ATP was in 2002.

Eight years later, having ignored the recommendations of the 2005 Master Plan, the 2010 ATP Parking Study is based on a '*limited pilot travel survey of employees of the ATP*'.

What the ATP would have had, if the valid Action of the 2005 Master Plan had been implemented, was five years of Annual staff transport surveys and, as a result, Travel Plans in place for employees and visitors.

The ATP would have had no need for a '*limited pilot travel*' survey.

What the residents of Alexandria would have had was relative peace in their streets. Instead, the impacts on Alexandria as a result of the inaction by the ATP and RWA over the implementation of the ATP 2005 *Master Plan* strategies have been severe.

Empty car spaces

Another interesting recommendation in the 2005 *Master Plan 4.10.2 Provisions e)* was

'Where possible provide a minimum 10% of parking generated by a particular building within the immediate vicinity of the building.'

While not mentioned in the Study, this totally supports the recommendations of residents, employees and Councilor Meredith Burgmann that the empty car park in front of the Channel 7 building be opened and used for employees cars.

Future Planning and car spaces available

In other parts of this section 2.3, the Study states that it provides *'background information about the existing and future planning'*.

In fact, no concrete information or critical analysis is provided relating to future parking implications.

No warning is given that unless the current parking situation is resolved now, the future for Alexandria and the ATP, with any new developments, will result in a far more severe parking situation.

This is evident when examining the figures given in this section 2.3. The reader is informed that:

- The maximum number of car spaces allowed for the ATP precinct is 1,600. (The number allocated was allegedly governed by the proposed upgrade of Redfern station and the close proximity of the ATP to the station. It is not made clear if this figure will be the total for the ATP precinct when more buildings are constructed on the site.)
- 2,500 people work currently in the Technology Park.
- As quoted, existing car parking on the ATP site is 1,180 car spaces which includes:
 - 864 car parking spaces (includes Channel 7); and

- 316 temporary car parking spaces, which are, located on future development sites.

These are available to tenants and visits.

- There are additional 303 temporary car parking spaces available for monthly special events and HSC marking
- Of the 863 permanent parking spaces 697 are in the Channel 7 Building (8 Central Avenue); 166 are in other areas of the ATP.
- 500 people and visitors of other ATP tenants are allocated 350 car spaces in the Channel 7 Building (8 Central Avenue).
- 2,000 employees who work in the building are left negotiating for 347 car spaces, that is, if they can afford the parking fees.
- If the three future buildings are constructed as planned and if the maximum number of car spaces allowed for the ATP precinct of 1,600 is not increased, that means 736 car spaces will be allocated to the three buildings.

The current situation is:

- If we accept that 45% of the 2,500 employees drive their cars to work, based on the ATP Traffic Report, that would mean 1,125 employees are seeking parking for their car spaces.
- If we use the figure of 30% car-mode use based on the percentage given in this section of the Study, 750 employees are looking for parking spaces most days.

According to the Study, the future situation concerning the planned developments on the present temporary car-parking sites, will result in:

- An extra 2,500 to 5,500 employees – base on an estimated potential future total employment of around 5,000 to 8,000 people/jobs – working in the ATP.
- Using the 30% target for car-use mode, between 1,500 to 2,400 employees will need car parking spaces.

If, according to the above analysis, only 736 car spaces will be available (unless the total number of 1600 for the ATP is greatly increased), the problems for residents will be indescribable.

What is certain is that overflow free parking will not be available in residential streets. The streets are full now.

Parking Fees

On the issue of parking fees, the claim is made in the Study that parking fees are charged *'in line with commercial practice and to manage parking demand'*.

Judging by the number of employees' cars parking in local streets, the employees clearly do not agree.

In 2009, the level at which parking was charged at ATP (\$30 per day for casual parking) appeared to be driving down the parking on-site given the huge number of vacant spaces that were obvious each day and the 'demand' for free parking in the nearby streets.

Offering employees substantial discounts in early 2011 of a monthly rate of \$8 a day or a casual rate of \$20 a day, made little difference to the pressure for parking spaces in streets around the ATP.

Strategies and behaviour change

At the end of section 2.3, the Study states that *'the current transport practice for the ATP is to encourage journey to work and business trips by public transport and or walk/cycling'*.

In the letter concerning the validity of the *Master Plan*, Mr Wakelin-King's and the ATP's efforts in this regard are referred to in the December 2011 email:

'As previously advised in the public meetings held on this issue, the 2005 Master Plan is no longer valid. It was replaced by the Built Environment Plan Stage 1 in 2006. This notwithstanding, ATPSL has been actively addressing the issue of traffic and parking impacts in and around the ATP. As such, we have undertaken numerous initiative and strategies on this matter, the details of which are available on our website.'

The problem for residents is that little observable evidence (less cars in the streets) exists that supports the ATP claim that their strategies have persuaded more staff to travel to the ATP site by public transport.

Changing employees' behaviors from a dependency on car travel takes far more practical action and effort than relying on *encouraging words* to initiate such a change in behaviour.

Context, sources and research

In Section 2.3 the Study has failed to establish solid grounds for the recommendations made as there is

- No relevant research of previous planning documents to establish a historical perspective
- No context for the parking situation.

All the documents quoted above (other than the Department of Transport 2011 letter) were readily available for the preparation of the ATP Parking Study.

Residents invested effort and their time into recommending a number of constructive strategies that were exactly the same as those of the 2005 Master Plan. In spite of the credibility of those suggested strategies, neither the value of the residents experience nor their knowledge and understanding of the situation are given due emphasis and credit in the Study.

Section 3.0 Community Consultation

Section 3.1 - Overview

The first stage of the community consultation was a letterbox drop to all properties in the area seeking written submissions. Email messages were also sent to community members who previously had contacted the ATP concerning parking matters.

Towards the end of the community consultation period, direct discussions were held between the consultant and a small number of residents who had made representations. Unfortunately, by then a number of the residents were overseas.

To some residents, a major flaw in the design of the consultation is that no open consultation meeting prior to the commencement of the Study was organized, despite the fact that a meeting with the community had been requested.

This is particularly pertinent in understanding how the Study manages to avoid analysing the parking situation in any depth.

If the community meeting had been conducted, the recognised source of the parking problem in Alexandria, the influencing factors such as the perceived lack of safety at Redfern station and the unacceptable bus services would have been tabled publicly and been hard to ignore.

At a pre-consultation community meeting, once the aims and the maps of the Study were presented which excluded the ATP precinct, the restricted purpose of the Study would have been evident.

At least from the beginning, residents would have had a clear understanding of the grounds for their submissions before wasting time and energy making recommendations that were not given due consideration.

Residents' expectations that the Study solutions would come from investigating both the ATP precinct and the streets of Alexandria would have been clarified.

Instead, many residents have been left feeling resentful and manipulated by the consultation process, reaching the conclusion that the Study was designed solely to suit the outcomes for the RWA and the ATP.

Having a Study that required residents to lodge submissions places the onus on the community to respond in writing rather than implementing a range of tools to engage and investigate; tools such as focus groups, surveys or even simple door knocking and speaking to residents. These are all far more effective ways to *'identify specific community concerns about parking'*.

By concentrating to a large degree on written submissions, the Study's chosen consultation methodology ignores the fact that many in the community are intimidated by even the thought of writing formal submissions. Others simply do not have the writing or computer skills required to participate.

Section 3.2 - Issues raised in First Stage of Community Consultation

In listing the issues raised in the 93 submissions that are summarized in Appendix 1, no mention is made that:

- Numerous submissions make specific reference to the fact that the cause of the issue is tenants and employees of ATP parking in nearby streets, especially since the Channel 7 Building (8 Central Avenue) opened.
- Many submissions make reference to the vast numbers of empty car parking spaces in ATP and the link between the high cost of parking at ATP and people from the ATP parking for free in streets of Alexandria.

- The sincere concerns, underlying some submissions, about the significant increase of car emissions in local streets affecting the health of residents and their children.

The rather obvious omission of the above only serves to underline that the Study was never designed to identify the root cause of the parking problem, nor seek to resolve the problem in a meaningful way.

The Study, does however note that:

'The highest numbers of submissions were received from the area bounded by Henderson Road, Newton Street, Jennings Street, Suttor Street, Renwick Street and Mitchell Road.'

In fact, submissions from these streets represented 58% of all submissions recorded in the Study. The Study also fails to highlight that the area bounded by the streets above is that closest to the ATP and is therefore the greatest impacted.

As with the scenario illustration of water leaking from the dam, only one option is considered to resolve the problem.

We assert that in reality, only one option was considered before the Study was even implemented - the implementation of the City of Sydney Council's resident parking scheme in the streets of Alexandria.

The lack of detail in this section of the Study discounts the seriousness of what is occurring in the local community and the degree of the negative impacts for those who live and work in Alexandria.

In contrast, the seriousness of the situation was acknowledged and emphasized by the Lord Mayor Clover Moore at the City of Sydney Council meeting in September 2011.

A letter in March 2011 from the Lord Mayor, in reference to the submissions in the ATP *Parking Study*, highlighted the fact that

'many submissions from residents commented that ATP should use incentives (such as lowering parking costs) to encourage workers to either use the onsite parking facilities or to use alternative forms of transport to get to work, rather than relying on parking restrictions in surrounding streets.'

Unfortunately, parking restrictions are the only option the Study offers.

Section 4.0 Parking Investigations

Section 4.2 - Parking Controls

While the outline of parking controls in the area in the Study are correct, there are

- No references to the number of houses in each street or the number of car spaces.
- No mention that in some narrow lanes people's houses open directly on to the road of the Lane. The Lane is in effect, their street. Lyne Lane a perfect example of this, is not even listed. The Study only makes general references to 'rear lanes'.

In this section, it is acknowledged that that amongst the residents' submissions there *'were also some submissions that did not support (permit parking) scheme'*.

However, the Study does not supply the reasons that some residents detailed for not supporting a resident parking scheme.

As an example, there are residents who support the City of Sydney Council's action to lessen the number of cars in the city and have chosen not to have a car registered in their name but have access to family members' cars.

These residents are not eligible for a Parking Permit for the family car that is registered at another address. In addition, as a Visitor's Parking Permit is not available, the result is the ratepayers has no greater claim to car spaces for a family car to park in their street than complete strangers who live elsewhere with their own car spaces adjacent to their homes.

Section 4.4 - Base Resident On Street Parking Demand

The Study identifies that a *'high level of on street parking in the area generated by the existing residents'*.

Because the statistics are given generally for the whole area and not specific streets, it is difficult to agree or disagree with the numbers given, but some comments are required.

The difference between 1,449 cars parked in the streets between midnight and 1am and the cars parked at noon (1,804) is 355 cars.

It cannot be presumed that all the 1,449 cars belong to residents.

People from outside the area are parking cars in the local streets instead of at the airport. In addition, ambulance workers based in the ATP work late night shifts.

By not being specific in detail with locations of the streets in relation to the ATP or the number of houses and car spaces in each street, the Study camouflages the reality that the streets with the highest capacity of filled car spaces each day are the streets closest to the ATP.

We would agree however, that the Study is giving a fair description of the situation in that many of the streets of Alexandria have their car spaces almost completely filled daily with cars parked legally and illegally:

'Most of the streets in the area have either a high parking demand (61%-79% of capacity) or a very high parking demand (greater than 80% of capacity). A number of these streets were either at capacity or had additional cars parked illegally'.

But what the Study does not disclose is that the streets closest to the ATP are the streets at 100% capacity, almost every day.

Observations of such streets as Lyne, Alexandria, Dadley, Kingsclear, can establish that fact easily.

At night and on weekends numerous car spaces are readily available. The reality is the further back one moves from the ATP, the more the streets exhibit a lighter demand for parking.

Section 4.5 - Maximum Weekday Parking Demand

The Study asserts that

'the parking demand in the area at this time is generated by a combination of the land uses of the area including residents, businesses, schools and community uses and a small number of commuters who park in the area. Employees of tenants in the ATP and some visitors to the ATP make up a proportion of the on street parking demand in the area, along with the other users nominated above.'

Comments

- In spite of the statements in ATP and RWA planning documents about the excellent transport in this area, people who actually who use local public transport know that those comments do not match the reality. Given the difficulties with public transport, the notion that commuters are parking in the area and then catching public transport is not substantiated.
- How is the small number of commuters who park in this area identified? We assert that it is not possible to differentiate a commuter's from a resident's car.
- Before 2008, the parking demand of the small number of business, schools and community centres in the area had never created a problem of significantly reducing the parking available to residents.
- As mentioned before, the dates are available of when residents' complaints were first lodged. We know for a fact that the complaints began with the construction of the Channel 7 Building (8 Central Avenue).
- Prior to 2008, the complaints sent to the ATP and RWA were not about parking. The complaints were concentrated on the noise at night emitting from buildings at the ATP.
- To pass off tenants in the ATP and some visitors to the ATP as making up a proportion of the on-street parking raises the question of exactly what proportion? How did the traffic consultant identify which cars are from the ATP to establish the proportion?

There is no mention of the Channel 7 Building (8 Central Avenue), or the number employees who work at ATP, in this section of the Study.

When the impact of the parking situation caused by the ATP and its tenants has had such a negative effect on Alexandria commercially, socially and environmentally for the past four years, the lack of acknowledgement and the lightness with which the impacts on the community are ignored or dismissed in this section amounts to nothing less than disrespect and disregard of the community of Alexandria.

By totally discounting and denying what residents and the local workers and business owners and employees of the ATP are experiencing, by omitting details that might place the ATP and Channel 7 in an unfavorable light, the credibility of the Study deserves to be questioned.

Section 4.7 - Analysis of On Street Parking Demand

In this section, the Study estimates that during business hours on weekdays, the maximum demand for on-street parking increases by some 355 vehicles.

This number, of course, is the result of residents' cars being moved when they travel to work, go shopping, keep appointments, socialise, etc. Their car spaces are taken by other people such as local workers of agencies, schools and businesses and the ATP; visitors, tradesmen, construction workers, commuters.

The number of 355 does not indicate how many cars are coming into the streets to park during the day.

If we accept the Study's statement that a small number of commuters also park in the streets, it would appear that the number of the cars parking in Alexandria would be significantly more than 355.

If we use the figure supplied in the Study that 17% of ATP employees drive to work and park on the street, that means at least 425 cars are looking for car spaces in the local streets.

Does that mean that more than 70 residents have moved their cars out of the streets to accommodate the ATP cars?

On the other hand, if the different rates of car mode travel for the ATP – 45% and 30%- are considered from previous ATP planning documents, it would mean that between 1,125 and 750 cars originating from the ATP will be seeking car parking either within the ATP or in local streets.

While some employees may pay to park in the ATP, residents are well aware that many employees, understandably, would prefer to park for free in the street nearby; a point not explored in the Study.

If, as the Study claims, 17% of the ATP employees park outside the ATP, that means 425 cars are parking in local streets. As no information has been supplied to determine how that percentage was determined, we, on our own analysis, challenge that estimate.

While those estimated numbers give a basis for the significant concern about the availability of street parking for residents currently, a far bigger issue is looming.

No reference is made within the Study to the fact that within the ATP precinct, the Channel 7 Building (8 Central Avenue) is only the first building in a series. Three more buildings are planned for the sites fronting onto Henderson Road.

As discussed earlier, with additional buildings being constructed the problem of on street parking by tenants and employees of the ATP will obviously become worse, far worse.

In this section 4.7, the Study makes reference to the '*limited pilot travel survey of the employees and tenants of the ATP*'. We would like to raise the following points, other than those raised previously:

- Residents would like more information about the survey - when it was conducted and by whom, and would like access to the survey and the detailed results.
- If the figure of 17% of respondents drive to work and park on the street is accurate, then it would appear that the estimate of maximum demand for on-street parking is understated by 20% (based on 17% of the 2,500 people working at ATP - section 2.3)

Section 5.0 Parking Options and Draft Parking Plan

Section 5.1 – Options

To quote from the Study:

'Options to address community concerns with regards to the level of parking that occurs in some of the on street areas in the study area would need to be in accordance with the current NSW regulations concerning parking controls and consistent with the parking policies and practices of the City of Sydney Council.'

By limiting the solutions to the parking problem options to a single option, before submissions were invited, the Study undermined the possibility of due consideration being given to the constructive ideas and positive solutions of residents.

Not only, as discussed previously, were the limitations of the Study not made clear to residents before they wrote their submissions, it also prevented the residents' solutions and ideas being aired and discussed.

If the solutions and ideas had been acknowledged, the ATP may have implemented them.

Those ideas may have been influencing factors on the new City of Sydney Council Parking Policy being developed. All of which may have broadened the approach to current and future parking matters in Alexandria and within the Local Government Area.

Unfortunately, none of the options put forward by the residents in their responses were included in this section. These options included:

- Allowing parking at ATP to be free or subsidized for workers (suggested numerous times)
- Opening the empty car park of 230 spaces in front of Channel 7 temporarily on a trial basis
- Encouraging increased use of public transport by offering discounted tickets/rewards/rebates
- Subsidising the purchase of bikes for employees
- Installing a Pedestrian overpass from the ATP to North Eveleigh/Carriageworks
- Developing systems to encourage car pooling
- Making passes available for residents/ratepayers to park in the ATP
- Introducing small car/motorcycle/scooter parking areas within the ATP.

Section 6.0 Community Comments on Draft Parking Plan and Recommended Final Parking Plan

Section 6.1 - Community Comments on Draft Parking Plan

The Study asserts that *'a number of members of the community meeting who spoke at the August community meeting were not supportive of elements of the Draft Parking Plan.'*

Such a bland comment significantly understates the level of fury and disbelief of the entire audience with the public release the Draft Parking Study at the ATP/RWA Community Information meeting on 9 August 2010.

The audience in their anger virtually took control of the meeting. In addition, the estimated number of people who attended the meeting is incorrect. It was far in excess of the 65 stated.

In several earlier submissions from residents, it was suggested that the ATP should conduct a parking study on its site. At the August meeting 2010, the majority of the residents voiced that proposal at full volume.

In this section of the Study, for the very first time, reference is made to residents' comments about the parking problem being *'caused by ATP and its tenants'* and that it was *'up to those parties to accommodate employee parking on the ATP site'*.

While we acknowledge that it was probably not the intention, this section has the potential to be the source of confusion and misperceptions.

In section 3.2 of the Study, *'Issues raised in the First Stage of the Consultation'*:

- The figure of 93 written submissions plus several additional submissions is given
- Streets are listed but without the number of submissions received for individual streets
- No recognition is given to the fact that the streets where the most on street parking issues identified in the submissions are in the vicinity of ATP, nor that the highest numbers of submissions were from the streets closest to the ATP.

Unless one is a local, one would not have the knowledge to understand the underlying importance of that point and what obvious conclusion is being omitted.

In section 6.1 *Community Comments on Draft Parking Plan*, it details that:

- 28 written submissions were received following the 9 August meeting
- Numbers of submissions for each street, unlike in section 3.2, are listed

As presented in this section, anyone not reading the document closely could conclude that the low numbers given were for the total number of submissions, when in fact they are only for the 28 submissions received **after** the release of the Draft Parking Study.

For consistency, transparency and ease of comparison, numbers of submissions should have been provided on a street-by-street basis throughout the document.

We also wish to express our very real concern that the number of submissions is understated.

We are aware of submissions that ARAG committee members made and the content of those submissions. They are not listed under the correct street name in Appendix 3 of the Parking Study. This would lead to the obvious conclusion that not all submissions have been incorporated.

The Study makes specific reference to the number of submissions supporting or opposing parking restrictions (7 and 8 submissions respectively). Of the 8 submission 'themes' listed, the last one makes reference to the fact that:

'Most submissions included comments that the ATP should consider reducing the cost of parking on the ATP site and examine means to

accommodate employee parking on the ATP site and or encourage more employees of tenants to travel by public transport.'

As the themes are presented in descending order from greatest number of submissions to least, it is disappointing that a theme from 'most submissions' is left until the very last point to be easily overlooked by a reader.

Section 6.2 - Recommended Final Parking Plan

The Study recommends the introduction of resident parking schemes and in addition, changes to a number of streets to include angled parking.

In making that recommendation:

- No critical analysis is applied to identifying the impacts and consequences of a residential parking scheme.
- Little recognition is paid to the fact that for some residents, parking permits will not resolve the problem, and will in fact only make life more difficult.

As the intention appears through out the whole Study is to steer clear of discussing the Channel 7 Building (8 Central Avenue) and any responsibility on the part of the ATP, no exploration is made therefore of the impact of parking permits in Alexandria on ATP or local workers.

The Study acknowledges that there is no '*clear-cut community support for elements of the Parking Plan*' on one hand.

On the other, the author still persists in recommending that:

'the parking permit ... element would be the most effective tool available for limiting the impact of parking associated with other non residential uses that occurs in the residential streets of Alexandria which currently have no parking controls/restrictions.'

To the very end, emphasis is placed on those findings that support the recommendation for parking permits – less complaints from streets with unrestricted parking – while downplaying the reality that it is the streets closest to the ATP that have the highest number of complaints.

Many residents firmly believe that the ATP and RWA collectively set the objective of the Parking Study to:

- Limit its recommendations to the introduction of resident parking and

- Ignore solutions that would call for responsibility on the part of ATP, RWA and the tenants of ATP.

There is little evidence to the contrary.

Section 7.0 Conclusions

The aim as outlined in the Study of identifying *'the level and type of parking that occurs in the local streets adjacent the ATP and identify options that would gain support of the City of Sydney Council'* has in part been achieved.

What has not been achieved is a solution that will *'address the concerns of the residents'*.

The final paragraph of the Study goes to the heart of the residents' concerns:

'It is noted that a large number of submissions received in both stages of Community Consultation expressed the view that the ATP should do more to accommodate tenant parking within the ATP site, either through price mechanism or other incentives that encourage other transport means rather than rely on on-street parking controls in the wider area.'

Acknowledgement

- We wish to acknowledge the efforts of all involved in the preparation of The *Parking Study for Alexandria Area Adjacent Australian Technology Park*. We recognize that the consultant's Brief for the Study, prepared by the management of ATPML (ATP), may have been the major determining factor in how the Study was developed.
- The details of that Brief have not been released to the public.
- This review by ARAG outlines the objections in more detail and would be best read in conjunction with the ATP's *The Parking Study for Alexandria Area Adjacent Australian Technology Park* with its references to specific section numbers. The *Parking Study* can be located on the ATP's website at <http://www.atp.com.au/Our-Location/Parking---Transport>.