

SJB Planning



Environmental
Assessment Report

Summer Hill Flour Mill
Redevelopment

2-32 Smith Street,
Summer Hill

Section 75W – Concept
Approval MP10_0155

Modification Application

April 2014

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Executive Summary

This Environmental Assessment (EA) has been prepared in support of an application to modify Concept Approval MP10_0155 determined by the Planning and Assessment Commission (PAC) on 7 December 2012.

The modification application is made under section 75W of the *Environmental Planning and Assessment Act 1979*. There have been no previous modification applications to this Concept Approval.

The MP10_055 approved:

- Four (4) development stages;
- A maximum GFA of 40,000m², comprising:
 - Maximum 33,500m² residential GFA;
 - Maximum 4,000m² commercial GFA;
 - Maximum 2,500m² retail GFA;
- 300 dwellings;
- FSR of 1.6:1;
- Basement car parking;
- 4,806m² of public open space dedicated to Council;
- 5,287m² of publicly accessible open space; and
- New streets to service the development.

A Project Approval MP10-0180 for Stage 1 was issued on 11 June 2013 and a Development Application has been lodged with Ashfield Council for Stage 2 works. The DA for Stage 2 is currently being assessed by Council.

The s75W does not propose modifications to Stages 1 or 2 approved and proposed dwelling numbers.

The modification seeks to maintain the overall GFA cap of 40,000m² GFA. Within the approved maximum GFA cap, it is proposed to amend the development yield to:

- 380 dwellings (34,500m² residential GFA);
- 4,000m² commercial GFA; and
- 1,500m² retail GFA.

To accommodate the amended dwelling yield the building envelopes in Stage 3 (Ashfield Council) and Stage 4 (Marrickville Council) are proposed to be amended.

The application is supported by plans prepared by Hassell and a revised traffic impact assessment prepared by ARUP.

The modification is proposed to optimise the redevelopment potential in a location that is well served by transport infrastructure and services. The modification does not seek to increase the maximum approved GFA but ensure that the approved building volume is efficiently utilised.

The traffic assessment demonstrates that the proposed modifications to floor space allocation reduce overall traffic generation in the AM and PM peak hours compared to the traffic generation of the Preferred Project Report (PPR) Scheme. The PPR traffic analysis identified an AM peak traffic generation of 206 vehicles per hour and a PM peak traffic generation of 258 vehicles per hour. By comparison the maximum yields conditioned in the Concept Plan generate an AM peak of 173 vehicles per hour and a PM peak traffic generation of 204 vehicles per hour. The proposed modification to the development yield generates an AM peak generation of 196 vehicles per hour and a PM peak traffic generation of 215 vehicles per hour.

The Concept Plan was approved on the basis of upgrade works to the road system to accommodate traffic generation rates generated by the PPR scheme development yield. That is, an AM peak of 206 vehicles/hour and a PM peak of 258 vehicles/hour. The proposed modified development yield results in traffic generation rates less than the PPR rates and accordingly it has been concluded in the traffic impact assessment that the proposed s75W modification will reduce impacts on the operation of the road system.

Similarly, the revisions to the building envelopes in Stages 3 and 4 are of a nature that does not dramatically alter the development silhouette or result in adverse impacts to future or existing development.

1.0 The Site and Context

1.1 The Site

The site subject to the Concept Approval (MP 10_0155) is known as 2-32 Smith Street, Summer Hill (refer Figure 1). The majority of the land is located within the Ashfield Council local government area. A small portion of the total redevelopment site, to the east of the Hawthorne Canal which bisects the site, is within the Marrickville Council local government area. The Hawthorne Canal forms the administrative boundary between these two (2) local authorities. The Hawthorne Canal is owned by Sydney Water.

The site has a total site area of 24,738m².



Figure 1: Aerial photo of the subject site (Source: NearMap)

The s75W relates to Stages 3 and 4 and proposes amendments to the approved building envelopes, a reallocation of floor space and an increase in the permitted dwelling cap.

Stage 3 comprises the following buildings:

- 2B and 2C - Mungo Scott building and annexe;
- 3A – new building on former timber silo location;
- 3B – new building;
- 3C – four pack of silos; and
- 3D – new building.

Stage 4 comprises building:

- 1A – new building.

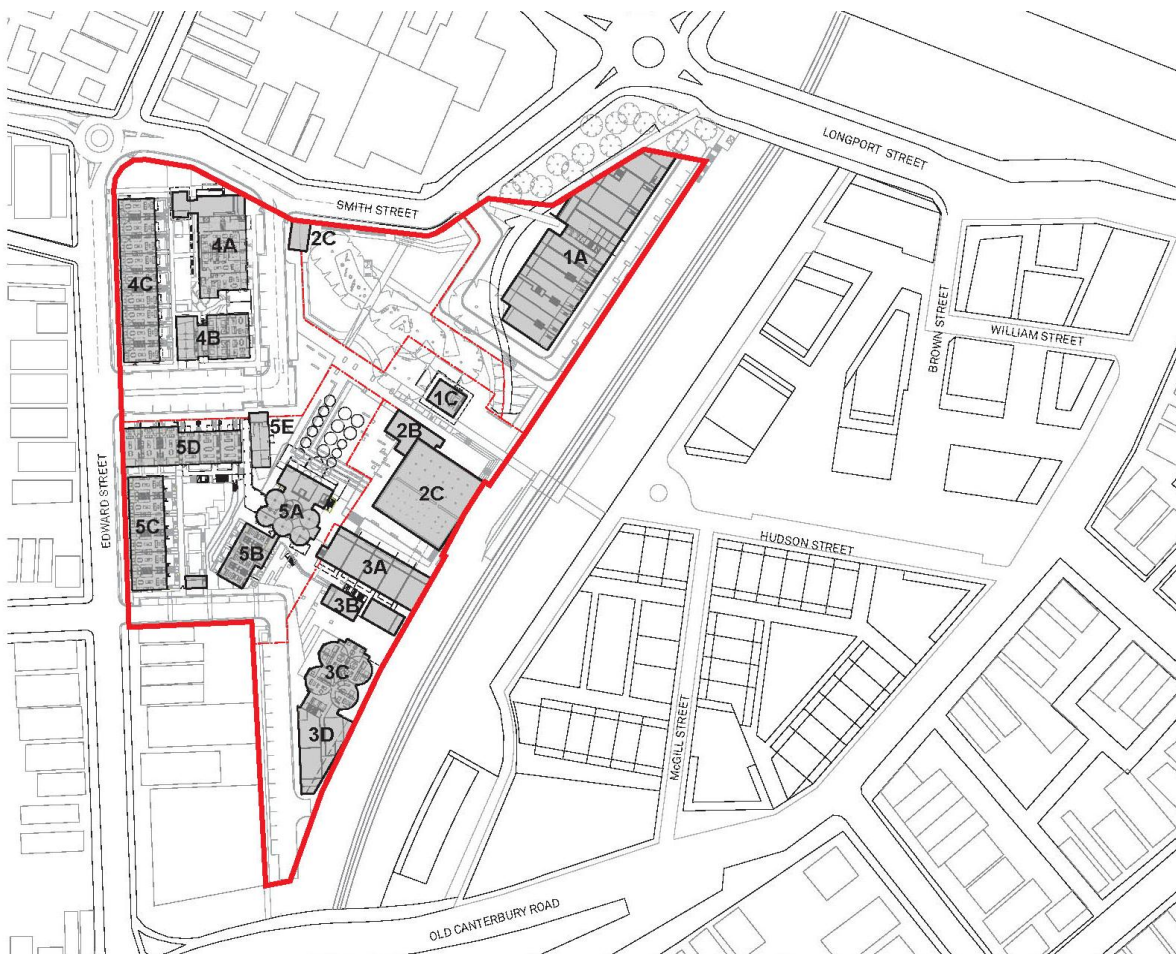


Figure 2: Building Identification Plan (Source: Hassell)

1.2 Existing Project Approval and Development Application

Project Approval MP10_0180 for Stage 1 has been granted by the Department of Planning & Infrastructure and a Development Application has been lodged with Ashfield Council for Stage 2 works.

Table 1 below provides a summary of the development approved or applied for within Stages 1 and 2 and a balance of the remaining GFA and dwelling yield.

Element	Stage 1 (approved)	Stage 2 (lodged)	Balance for Stages 3 &4
Residential GFA	4,682m ²	7,972m ²	20,846m ²
Commercial GFA	186m ²	224m ²	3,590m ²
Retail GFA	368m ²	216m ²	1,916m ²
Dwellings	44	83	173

Table 1: Summary of existing approvals

Table 1 demonstrates that with 173 dwellings to be provided in 20,846m², the average dwelling size, would be 120m². This is an uneconomic outcome and forgoes significant opportunity to maximise the provision of housing opportunities in a well serviced and located site.

The proposed modification would increase the remaining residential GFA to 21,846m² and the remaining dwelling yield to 253 dwellings. This delivers an average dwelling size of 86m² which is a more appropriate dwelling size, ensures that a range of dwelling types and sizes is delivered and maximises the efficient utilisation of existing infrastructure services.

2.0 Proposed Section 75W Modification

2.1 Modification Description

The s75 Modification seeks to amend the building envelopes within Stages 3 and 4 as shown in Figure 3, to accommodate the amended development yield. The maximum approved GFA of 40,000m² is not proposed to be modified. A minor amendment to Building 5A in Stage 2 is proposed to accommodate a lift overrun.



Figure 3: Section comparisons (Source: Hassell)

A comparison between the approved and proposed development description is provided in Table 1 below.

Element	Concept Approval	Proposed Modification	Difference
Maximum GFA	40,000m ²	40,000m ²	No change
Maximum Residential GFA	33,500m ²	34,500m ²	+ 1,000m ²
Maximum Commercial GFA	4,000m ²	4,000m ²	No change
Maximum Retail GFA	2,500m ²	1,500m ²	- 1,000m ²
Maximum dwellings	300	380	+ 80

Element	Concept Approval	Proposed Modification	Difference
Maximum FSR	1.6:1	1.6:1	No change
Public open space dedicated	4,806m ²	4,806m ²	No Change
Publicly accessible open space	5,287m ²	5,287m ²	No Change

Table 2: Comparison between Concept Approval and proposed modification

In summary, 1,000m² of GFA is to be transferred from the retail GFA to residential GFA. This transfer of floor space plus the provision of dwellings with an average GFA of 86m² and modification to the building envelopes would permit the accommodation of up to 80 additional dwellings within the existing overall GFA cap of 40,000m².

2.2 Description of Modified Building Envelopes

A detailed building by building description of the modified building envelopes is outlined below.

2.2.1 Building 3D

Building envelope 3D is approved at RL 39.35.

The modification seeks to accommodate within this envelope a nine (9) level building. This is proposed through an increase in the height of the envelope by 550mm to RL39.9m plus a recessed plant and lift overrun zone to RL42.9m. This modified envelope remains from the highest point 14.6m lower than the top RL of building 3C (the four pack silos) located to the immediate north.

The modification in the approved envelope is minimal and does not detract from Building 3C remaining as the stand out landmark building on the site.

2.2.2 Building 3C

No change to the height of the approved building envelope is proposed for Building 3C (the four pack silos) with the maximum height remaining at RL57.5m. The detailed design process has identified that the height of the envelope can accommodate 14 storeys of accommodation without any compromise to floor to ceiling heights of 2.7m.

The modification therefore does not alter the building envelope in this instance other than to identify the building as a 14 storey rather than 13 storey building. The modification to Building 3C is minimal, and has no external impacts.

2.2.3 Building 3B

Building 3B was approved as a two (2) storey building located between the four pack of silos and the nine (9) storey timber silo building.

The approved envelope is at RL 15.5m. The modification seeks to amend this building to a four (4) level structure to RL 23.9m.

The modification is considered to have a negligible impact given the low rise nature of the building and its location between two (2) significantly taller buildings well within the site.

2.2.4 Building 3A

Building 3A is approved to RL42.3m and is identified as a nine (9) storey building. The approved envelope can accommodate ten (10) storeys if a plant and lift overrun zone is accommodated to an RL of 45.5m. A service zone to RL43.95m is also proposed to the south of the building which would accommodate the lifts to also service Building 3B.

The modification essentially requests the addition of a plant overrun zone to facilitate an additional level of accommodation within the current approved envelope.

2.2.5 Building 2A

Building 2A is the Mungo Scott building. No changes to the building envelope are proposed. The modification identifies the capacity to provide upper level accommodation within the roof zone of the existing structure.

The modification has a negligible impact and seeks only to denote the potential to provide accommodation within the roof space.

2.2.6 Building 1A

Building 1A is the largest new building proposed on the site. The approved building contained up to ten (10) levels. The building was configured as a six (6) level podium with two (2) tower elements to the south and centrally located. The southern tower rises to nine (9) levels within a maximum height of RL44.2m. The central tower element rises to ten (10) storeys within a maximum RL of 47.4m.

The presentation to Longport Street of six (6) storeys is at a maximum of RL30.7m.

The modification seeks to infill the gap between the two (2) tower elements with a minor increase in the approved envelope height from RL47.4m to RL48.6m.

No changes to the northern section of the building fronting onto Longport Street is proposed (refer to Figure 4)



Figure 4: View analysis

2.2.7 Building 5A

Building 5A is the six pack of silos. Term of Approval B2 of the Concept Approval limits the height of the building to RL 45.4m. The terms of condition B2 allow plant and lift overruns beyond this height so long as they are within the height of the current lift and blower structure envelope which is up to RL50.49m.

Drawing DA-111 seeks a minor modification to this condition to permit two (2) lift projections to RL47.16m that are not wholly within the envelope of the existing blower structures. The two (2) lift overruns are to the north-east of the blower structure envelope. The two (2) requested protrusions sit well below the predominant height of the blower structure at RL 48.11m and are recessed substantially from the building edges ensuring they are not visually dominant.

The modification is required to accommodate the second lift core required to be provided. The overrun is well below the maximum height of the blower structure and will have a negligible external impact.

2.2.8 On-street Car Parking

The Terms of Approval require the demonstration of the provision of a minimum of 50 on-street car parking spaces. The detailed design of Stages 1 and 2 to date, with requirements for drop and ride spaces, loading zones and the like, has identified that 50 on-street spaces may not be able to be achieved. Modification is therefore sought to reduce the terms of the approval to require the provision of a minimum of 35 on-street car parking spaces, with on-street car parking to be maximised as far as possible.

2.2.9 Affordable Rental Housing

The current terms of approval require ten (10) dwellings to be set aside as affordable rental housing for a period of ten (10) years. At the expiry of ten (10) years the dwellings would no longer be affordable housing. The modification seeks to replace the ten (10) temporary affordable rental dwellings with three (3) dwellings to be dedicated to Marrickville Council. These three (3) dwellings would be affordable rental dwellings owned in perpetuity by Council and are proposed to be provided instead of the ten (10) time limited dwellings.

2.3 Terms of Approval to be Modified

The requested modification will require the revision to the terms of the Concept Approval as set out in Table 2 below.

Existing approval terms	Proposed modification terms
Building envelopes A4 Building footprints and setbacks are to be generally consistent with the Concept Plan building envelope parameter diagrams for each site, except where amended by the Modifications in Part B of this Approval.	Building envelopes A4 Building footprints and setbacks are to be generally consistent with the Concept Plan building envelope parameter diagrams for each site, except where amended by the Modifications in Part B of this Approval (s75W plans substituted).
Maximum Gross floor Area (GFA) A5 The maximum GFA for the development shall not exceed 40,000m ² comprising a maximum of: <ul style="list-style-type: none">– 33,500m² residential GFA– 4,000m² commercial GFA; and	Maximum Gross floor Area (GFA) A5 The maximum GFA for the development shall not exceed 40,000m ² comprising a maximum of: <ul style="list-style-type: none">– 34,500m² residential GFA– 4,000m² commercial GFA; and

Existing approval terms**Proposed modification terms**

– 2,500m² retail GFA.

– 1,500m² retail GFA.

Maximum number of Residential Units

A6 The maximum number of residential dwellings shall not exceed 300 units.

Maximum number of Residential Units

A6 The maximum number of residential dwellings shall not exceed 380 units.

Building height

B2 The plans described above in Part A – Terms of Approval shall be modified to provide a maximum height of RL45.4m to Building 5A (6 pack silos and building to the north) excluding the existing lift and blower structure. Plant, lift overrun structures and the like may exceed this height if wholly accommodated within the envelope of the existing lift and blower structure.

Delete

Amended plans, demonstrating compliance with this modification shall be submitted to, and approved by, the Director General.

Schedule 3 modifications**Car Parking**

4 Future applications are to demonstrate that a minimum of 50 on-street car parking spaces will be provided.

4 Future applications are to demonstrate that a minimum of 35 on-street car parking spaces will be provided.

Schedule 4 Statement of Commitments modifications**5 Public domain**

No changes to commitment.

Amend timing.

Public access will be provided through the site providing access over and through the open space from Smith Street affording access to the Lewisham West light rail stop. The access will include the use and enjoyment of the open landscaped areas off Smith Street and the proposed urban plazas around the reused buildings that are to provide ground floor active uses.

The treatment of these public domain areas consistent with the Landscape Open Space and landscape Concept themes in the Concept Plan will be documented at the Project Application or Development Application stage of the proposal. The land dedication and embellishment will be completed prior to the final occupation certificate for the development.

15 Affordable rental housing

The provision of ten (10) 1 or 2 bedroom dwellings as affordable rental accommodation for a period of ten years for each dwelling, from the date of relevant occupation certificate.

15 Affordable rental housing

The dedication to Marrickville Council of three (3) 1 or 2 bedroom dwellings to be owned and managed by or on behalf of Marrickville Council in perpetuity as affordable rental accommodation.

Existing approval terms	Proposed modification terms
Timing – To be provided in stages 2, 3 or 4.	Timing – To be provided in stage 4.

Table 3: Table of amendments to terms of approval

2.4 Consultation on the Modification

The proposed s75W Modification has been the subject of discussions with officers of the Department of Planning and Infrastructure (DP&I) and staff at Marrickville and Ashfield Councils.

The information contained in this application is consistent with the material tabled at these pre-lodgement meetings.

3.0 Planning Framework

This Environmental Assessment (EA) has been prepared to identify the relevant matters for consideration arising from the proposed modification to the Concept Approval.

Those instruments and controls directly relevant to the assessment of the proposed modifications are considered below.

3.1 State Environmental Planning Policy (Major Development) 2005 and Part 3A of the EPA Act

Concept Approval MP10_0155 was approved under the provisions of Part 3A of the *Environmental Planning and Assessment Act 1979 (EP&A Act 1979)*. Part 3A of the Act was repealed on 1 October 2011 and SEPP Major Development 2005 was concurrently modified, with the deletion of the Schedule identifying the types of projects to which Part 3A applied.

Despite this, Part 3A continues to apply to certain projects subject to the transitional provisions identified in Schedule 6A of the Act. Under Schedule 6A, MP10_0155 is a defined *transitional Part 3A project*.

Clause 12 of Schedule 6A states:

12 Continuing application of Part 3A to modifications of certain development consents

Section 75W of Part 3A continues to apply to modifications of the development consents referred to in clause 8J (8) of the Environmental Planning and Assessment Regulation 2000, and so applies whether an application for modification is made before or after the commencement of this clause.

Consistent with the above transitional provisions, the current application is lodged under the provisions of s75W of the Act.

The Minister for Planning and Infrastructure (or his delegate) is the consent authority for transitional Part 3A projects.

3.2 State Environmental Planning Policy (Infrastructure) 2007

The provisions of SEPP Infrastructure require consideration of the application for traffic generating development and development within the vicinity of a rail corridor.

The approved and proposed modification to the Concept Approval exceed the threshold of clause 104 of the SEPP requiring referral of the application to the RMS.

The Terms of Approval require the undertaking of upgrade works to traffic infrastructure at various stages including the installation of a new roundabout at Stage 1 and traffic signals as part of Stage 3 works.

The modification request is supported by a traffic assessment (Attachment 2). The assessment identifies that due to the reduction in retail GFA, there will be an overall reduction in AM and PM peak traffic generation rates to a level below the traffic generation rates upon which the traffic infrastructure upgrade requirements were based.

Similarly the proposed modification does not seek to alter the requirement for referral and consideration of excavation and development in the vicinity of the light rail consistent with clause 84 of the SEPP.

3.3 State Environmental Planning Policy No.65 Design Quality of Residential Flat Development

The proposed modifications have been prepared and designed by Hassell, the original project architects. The modifications do not impede the ability for Stages 3 and 4 to remain consistent with the requirements of SEPP 65 and the associated Residential Flat Design Code.

3.4 State Environmental Planning Policy (BASIX) 2004

Certification of the compliance with the requirements of BASIX will remain required for future development applications for Stages 3 and 4.

The modifications do not include matters that would preclude these future applications from demonstrating consistency with the SEPP.

3.5 State Environmental Planning Policy 55 – Remediation of Land

Remediation Action Plans (RAP) are required for future Development Applications by the existing Terms of Approval to ensure that consistency with the SEPP is achieved.

3.6 Ashfield LEP 2013 and Marrickville LEP 2011

The Ashfield LEP 2013 zones the part of the site within the Ashfield Council area IN2 Light Industrial and imposes a maximum FSR of 1:1 and maximum height of buildings of 10.0m. The site is proposed to be identified as a heritage item, but will not be within a conservation area. The development is prohibited under the provisions of the LEP.

The part of the site within Marrickville Council is zoned IN2 under Marrickville LEP 2011 which also prohibits the development.

Permissibility for the proposal is derived from Concept Approval MP10_0155.

4.0 Assessment of Impacts

The impact of the proposed s75W modifications are considered in the following sections.

4.1 Built Form/Urban Design

The requested modification proposes revisions to the building envelopes within Stages 3 and 4. The most substantial modification is proposed to Building 1A within Stage 4.

The modifications to the building envelopes have been carefully considered to ensure that the underlying principles of the masterplan are maintained. These principles include ensuring that the silos in their reconfigured form remain the prominent buildings on the site, that the Mungo Scott building maintains its visual prominence viewed from the north, and an interesting and varied silhouette is maintained to the light rail corridor frontage, and attractive and functional public and publicly accessible spaces are provided within the development site.

The modifications to the built form do not detract from the masterplan continuing to deliver on these outcomes.

The modifications do not result in unacceptable solar access impacts to adjoining development and do not preclude the future development from achieving the required residential amenity or environmental performance.

The substantive amendment proposed is to Building 1A in Stage 4. The modification does not alter the relationship to Longport Street. The increased building mass is located within the site. The visualisations included at Attachment 1 provide for an attractive building that provides an excellent relationship to the Mungo Scott building, and demonstrate how the envelope can be articulated architecturally.

The visualisations in the architectural package demonstrate that the building envelope can be articulated to respond to the site character. The relationship with the Mungo Scott building in particular is demonstrated with the provision of a masonry base to a height consistent with the Mungo Scott building.

The upper levels would be off a lighter material and facilitate articulation of the facades through expression of the cores.

The resulting building envelope is considered to remain as a positive contribution to the presentation of the development to the light rail corridor and Longport Street.

4.2 Traffic impacts

The impacts of the redevelopment of the site on the performance of the surrounding traffic network was a significant assessment issue in the determination of the Concept Approval.

This s75W modification is supported by a revised traffic assessment prepared by ARUP (Attachment 2).

The updated traffic assessment demonstrates that the reduction in retail area of 1,000m² reduces overall traffic generation in the AM and PM peak hours compared to the traffic generation of the PPR for the Concept Approval. The traffic generation rates in the PPR formed the basis of detailed peer review of the traffic impacts and formed the basis of required upgrades to the surrounding road network including the

provision of a new round about at Smith and Edward Streets and traffic signalisation of the Edward Street and New Canterbury Road intersection.

The PPR traffic analysis identified an AM peak traffic generation of 206 vehicles per hour and a PM peak traffic generation of 258 vehicles per hour.

By comparison the maximum yields conditioned in the Concept Plan generate an AM peak of 173 vehicles per hour and a PM peak traffic generation of 204 vehicles per hour.

The proposed modification to the development yield generates an AM peak generation of 196 vehicles per hour and a PM peak traffic generation of 215 vehicles per hour. This represents an AM peak reduction of 10 vehicles and a PM peak reduction of 43.

The traffic assessment identifies that as the Concept Plan was approved on the basis of upgrade works to the road system to accommodate the traffic generation rates of the PPR development yield.

The proposed modified development yield results in traffic generation rates less than the PPR rates. Accordingly it has been concluded in the traffic impact analysis that the proposed s75W modification will reduce impacts upon the operation of the road system compared to the impacts modelled.

4.3 On-street Parking

Detailed design development has identified that the new roads proposed are physically not capable of accommodating the required quantum of 50 on-street parking spaces.

The provision of any on-street car parking is in addition to parking required to be provided by the development, all of which is proposed within basements. The terms of the approval require the provision of off-street car parking for all of the residential and non-residential uses. At no stage has on-street car parking been relied upon to satisfy parking demand generated by the development. The on-street parking able to be provided is in addition to the parking demand generated and required to be satisfied.

The requested variation therefore does not reduce the car parking numbers to be provided in support of the development. The requested modification is a direct result of the detailed design identifying that there is an insufficient length of public road proposed to accommodate 50 car spaces, as well as drop-off points, loading zones and pedestrian access. It is requested that the minimum on-street target be a minimum of 35 spaces, with the ultimate provision to be maximised where possible.

4.4 Affordable Rental Housing

The Concept Approval Statement of Commitments included the provision of ten (10) one or two bedroom dwellings as affordable rental housing for a period of ten (10) years. After the expiration of ten (10) years the dwellings would revert to the open market.

The ten (10) dwellings represent 3.3% of the approved dwellings being provided as affordable rental housing. On a proportional basis the additional 80 dwellings proposed in the modification would require the provision of an additional 2.6 dwellings as affordable rental housing for a ten (10) year period.

The proponent as an alternative consideration proposes the direct dedication to Marrickville Council of three (3) dwellings from Stage 4 for use as affordable rental housing. The dwellings would be owned by Council and would remain as affordable rental housing in perpetuity.

The option of this alternate arrangement has been raised with Marrickville Council as an alternative desirable outcome for the provision of affordable rental accommodation. The refinement of the alternative direct dedication to Council of three (3) dwellings will be confirmed with Council as part of the assessment process for the s75W modification.

The option of dedication of the dwellings to Marrickville Council has been based upon two (2) factors. Firstly, Marrickville Council has an established affordable housing program which could administer the rental of the dwellings. Secondly, it is a balance between dedication of assets to the two (2) relevant Councils. The development will result in the dedication to Ashfield Council of a substantial open space asset. The proposed approach also provides an asset to Marrickville Council.

The most important outcome is the delivery of affordable housing stock. Which Council area it is located in is irrelevant as it serves the same locality.

4.5 Visual Impact

The modification is supported by a series of comparisons between the existing approved envelopes and the proposed amended envelopes (Attachment 1). These comparisons demonstrate that envelopes as proposed to be amended will have a minimal visual impact from the key vantage points. Importantly the interface with the existing residential areas of Stages 1 and 2 do not alter as a result of the modification request.

4.6 Environmental and Amenity Impacts

The modified envelopes do not substantially alter the solar access impacts of the approved Concept Plan or result in loss of views to surrounding properties. The modifications to the building envelopes are remote from existing development and will not alter the relationship of the approved development to the surrounding locality.

4.7 Economic Impacts

The modification does not alter the approved volume of commercial GFA and proposes an effective reduction in retail GFA of 1,000m². The Concept Approval was determined to have a minimal impact upon the trade viability of existing retail areas in the vicinity of the site. The reduction in retail GFA will further reduce this impact.

4.8 Drainage/Water Management/Flooding

The modification does not alter the flood management requirements in the Concept Approval or the ability for these requirements to be satisfied in future Development Applications for Stages 3 and 4. No changes are proposed to the flood design levels of finished floor levels proposed.

The modification does not alter or amend the flood risk management measures developed in support of the Concept Approval and incorporated into the Terms of Approval.

4.9 Contributions

Consistent with the Statement of Commitments, s94 contributions required under the Ashfield and Marrickville s94 Contributions Plans will be required to be paid for any future approvals granted.

5.0 Conclusion

Concept Approval MP10_0155 approved a maximum GFA of 40,000m², within which a maximum residential GFA of 33,500m² was permitted. The Concept Approval also capped the dwelling numbers at 300.

The Stage 1 Project Approval and Stage 2 Development Application provide 127 dwellings in a total residential GFA of 12,654m². This leaves a balance of 173 dwellings that can be approved within 20,846m² of residential GFA. The average dwelling size within this GFA would be 120m². This is excessively large for modern dwellings and would not be viable to deliver. The average dwelling size target is 85m². The provision of 173 dwellings at an average of 85m² each would utilise 14,705m² of GFA. This would leave 6,141m² of residential GFA unrealised on the site.

Given the site's excellent location relative to transport and services, not realising this demand represents an inefficient use of the land, contrary to the objectives of the Act and sound planning principles.

The modification is sought to ensure that the development of the site delivers the optimum use of the land and the resultant provision of housing.

The modifications have been demonstrated to not increase the impacts to the transport network and will be accommodated within the upgrades required as a result of the approved development.

The modification includes the potential for the alternate delivery of affordable rental housing through the dedication of dwellings to Marrickville Council in perpetuity instead of the current provision where ten (10) dwellings are provided for a time limited period of ten (10) years.

The proposed modification does not result in adverse impacts to the amenity of surrounding development or the public domain.

Approval of the modification is considered warranted in the circumstances.



Attachments

Attachment 1: Architectural Plans – prepared by Hassell

6341D_11.2_Revised S75W EA_140430

Attachment 2: Traffic assessment – prepared by ARUP