



Director-General  
Department of Planning & Environment  
GPO Box 39  
Sydney NSW 2001

Attn: Natasha Harras

11 September 2014

Dear Natasha,

**Re: Modification Request – Concept Plan Approval for Redevelopment of the Former Allied Mills Site, 2-32 Smith Street, Summer Hill (MP10\_0155 MOD1)**

We refer to the Department's letter to EG Funds Management of 21 July 2014 detailing the matters to be addressed arising from the public exhibition of the proposal and the assessment undertaken by the Department.

In response to the matters raised, the s75W request has been revised as follows:

- Affordable housing to be dedicated to Marrickville increased to four (4) dwellings comprising 2 x 1 bedroom and 2 x 2 bedroom dwellings within Building 1A.
- The setback of the upper levels of Building 1A from Longport Street has been increased from a 21.0m setback to a 25.2m setback.
- Urban design and architectural design guidelines have been prepared for Building 1A to guide the detailed design of the building and to ensure the anticipated articulation and design relationships are translated into future development applications. The guidelines are included in the revised Statement of Commitments.
- Indicative floor plans have been prepared for Building 1A demonstrating layouts, dwelling mix and allowing for a more detailed SEPP 65 consideration to be undertaken.
- Tabularised assessment of solar access and cross flow ventilation able to be achieved for Building 1A.
- Detailed solar access impact assessment of the Mungo Scott building.

**1.0 Modification Description**

For certainty, the description of the requested modifications are detailed as requested in the Department's letter.

**Building 3D**

Building 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 RL 39.9m plus a recessed plant and lift

overrun zone to RL 42.9m. 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 to the approved envelope is minimal and does not detract from Building 3C remaining as the standout landmark building on the site.

### **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 RL 57.5m. The detailed design process has identified that the height of the envelope can accommodate 14 storeys of accommodation without any compromise to minimum 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 has no external impacts.

### **Building 3B**

Building 3B was approved as a two (2) storey building located between the four pack 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.

### **Building 3A**

Building 3A is approved to RL 42.3m 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 RL 43.95m 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 and lift overrun zone to facilitate an additional level of accommodation within the current approved envelope.

### **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 space of the existing structure.

The modification has no external impacts.

### **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) taller elements to the south and centrally located. The southern portion as approved was nine (9) levels within a maximum height of RL 44.2m. The central portion as approved was ten (10) storeys within a maximum RL of 47.4m.

The presentation to Longport Street of six (6) storeys is at a maximum of RL 30.7m.

The modification seeks to infill the gap between the two (2) taller elements with a minor increase in the approved envelope height from RL 47.4m to RL 48.6m. The setback of the upper levels from the northern edge of the podium is to be increased from 21.0m to 25.5m.

No changes to the northern podium section of the building fronting onto Longport Street is proposed.

### **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 and allows plant and lift overruns beyond this height provided they are within the height and footprint of the current lift and blower structure envelope which is up to RL 50.49m.

The envelope of Building 5A is sought to be amended as follows:

- The silos and new building at RL 45.44m to reflect the latest surveyed heights of the silos.
- The central plant zone of the silos to be RL 50.49m to reflect the latest surveyed heights of the silos.
- Allowance for two (2) small plant zones to RL 47.16m to the north of the silo plant zone, which are outside of the current roof top structures, but 3.33m below the height of the existing structures above the silo.
- The modification is necessary 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.
- Building 5A remains identified as an eleven (11) storey building consistent with the approved Concept Plan.

### **Building 5B**

Building 5B has an approved top RL of 35.2m and is identified as a six (6) storey building. The proposed modification seeks no alteration to the maximum RL. The structure, within the approved envelope is now nominated as a seven (7) storey building.

The footprint of the building shifts to the north-west marginally closer to Building 5C.

### **On-street car parking**

The terms of the Concept 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 kiss 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 amend 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. It is reiterated that in accordance with the terms of the Concept Approval, off-street parking within the basements is required to be provided for all residential, retail and commercial space provided within the development.

### **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 as lodged proposed to instead dedicate three (3) dwellings to Marrickville Council with no time limitation, and the dwellings being outright owned and managed by Council.

The proposal is now modified to dedicate four (4) dwellings to Marrickville Council comprising 2 x 1 bedroom dwellings and 2 x 2 bedroom dwellings within Building 1A in Stage 4 of the development.

A summary of the comments raised in the submissions received from public authorities and the community is provided in Attachment 1 and a detailed response to the issues raised in the submissions is provided below.

## **2.0 Height and built form, visual bulk and scale (Building 1A)**

As indicated in the description of proposed modifications, the footprint of the proposed levels above the six storey podium has been reduced in a north-south extent. This has led to an increase in the setback of the upper levels of Building 1A from the northern extent of the podium from 21.0m to 25.5m.

The modification seeks to increase the maximum height of the envelope for Building 1A to RL 48.6m, compared to the approved maximum height of the central tower of RL 47.4m. This is an increase of 1.2m.

As shown in the design guidelines and visualisations, the proposed height to 47.4m is sought to accommodate a recessed roof plant zone. The parapet level of the building able to be accommodated within the requested envelope would therefore sit between the two (2) current approved top RLs of 44.2m and 47.4m.

The visualisations demonstrate that the relationship between the proposed envelope and the approved envelopes opposite the site are not inconsistent.

Importantly, the proposed design guidelines are intended to ensure the articulation of the proposed elevation both in the horizontal plane with the distinction between a strong base and a lighter weight top of the building. To provide a vertical articulation, the design guidelines require the inclusion of a recessed, day lit circulation area which provides a visual break as well as natural light and ventilation to the circulation core of the building.

The visual impacts of the proposal have been managed through the reduction in size of the upper levels and implementation of design guidelines to reinforce the horizontal and vertical articulation of the building.

The second element of the assessment of the modification relating to the envelope of Building 1A, concerned solar access impacts, particularly to the Mungo Scott building to the south.

An analysis of the solar access impacts of the approved and proposed envelope of Building 1A has been prepared and is included in the architectural drawing package at Attachment 1. The analysis demonstrates that there is a negligible difference between the approved and proposed envelope on the Mungo Scott building and the open space access through the site.

## **3.0 Solar access and ventilation**

Future Environmental Assessment Requirement 1 of Concept Approval MP10\_0155 requires future developments to demonstrate that a minimum of 70% apartments within each building shall achieve 3 hours of solar access in mid-winter and 60% of apartments shall be capable of being naturally cross-ventilated.

To date, the 127 apartments in Stages 1 and 2 have demonstrated that 112 (88.2%) receive 3 hours of solar access in mid-winter between 9.00am and 3.00pm and 127 (100%) are capable of natural ventilation.

Indicative floor plans for Building 1A have been prepared and a SEPP 65 assessment has been undertaken by Hassell addressing solar access and cross ventilation outcomes (refer to Attachment 1).

The assessment has identified that 84 or 75% of the potential 112 dwellings in Building 1A are capable of natural ventilation.

The solar access analysis identifies that 61 or 54.4% of the potential dwellings in the proposed envelope of Building 1A would achieve 3 hours of solar access. The assessment also demonstrates that the 54.4% of

dwellings which receive 3 hours of solar access between 9.00am and 3.00pm continue to receive sun access such that between 9.00am and 3.00pm in mid-winter, these 61 apartments receive in excess of 5 hours of solar access.

Considering Stages 1 and 2 (which have been designed) and Building 1A (Stage 4) a total of 239 dwellings would be accommodated. Across these stages (Stages 1, 2 and 4) 173 (72.4%) would receive a minimum of 3 hours of solar access and 211 (88.3%) would be capable of being naturally ventilated. Stage 3 has yet to be subject to detailed design development, however the building envelopes are such that solar access and natural ventilation rates are anticipated to be commensurate with those achieved in Stage 2.

The development as a whole is tracking well above providing the minimum requirements of 70% of solar access and 60% capable of natural ventilation.

The intent of the Residential Flat Design Code and the rules of thumb relating to solar access and natural ventilation seek to avoid the creation of apartments of poor amenity. Amenity derives from many factors which include solar access and ventilation. Amenity is also significantly contributed to by considerations such as outlook, access to light, floor to ceiling heights, apartment layout and provision of private open space.

A holistic consideration of the proposed dwellings in Building 1A concludes that these dwellings would not be substandard or dark dwellings. The proposed layout provides excellent outlooks and internal space. Importantly, all of these apartments have an easterly aspect and will all receive excellent early morning sunlight to the living rooms and private open space areas, which while offering considerable amenity to the apartments, is not included in the numerical assessment as this light is received before 9.00am. This outcome is reflected in the assessment table in Attachment 1 which demonstrates that if sunlight from 7.30am to 9.00pm were included, 100% of the dwellings proposed would receive a minimum of 2 hours of solar access. This consideration confirms that the apartments will not be devoid of sunlight and will not be of poor amenity.

It is also noted that the mathematical outcome could be manipulated to provide the 1 bedroom apartments exclusively to the western elevation, thus increasing the proportion of the dwellings receiving 3 hours of sunlight between 9.00am and 3.00pm. This however would be a manipulation for a statistical outcome rather than an outcome considering the overall quality and amenity of the dwellings provided. As noted, despite 60% of the dwellings not receiving the numerical requirement of sunlight on a quantitative basis, the qualitative assessment and consideration of the amenity of the apartments supports the proposed layout.

#### **4.0 Amended public domain staging**

It is sought to amend the statement of commitments to refine the timing of the final total public domain provision. The flexibility is sought to ensure appropriate construction zones are able to be accommodated within the site, particularly for Stage 4 construction. Stage 4 is located on a site bound by the Hawthorne Canal and the light rail corridor, presenting practical constraints.

The delivery of the light rail access approved as part of Stage 1 would not be affected, with this access provided with this stage. What is sought to be staged is the delivery of the final totality of the open space to be dedicated to Ashfield Council.

The requested flexibility of delivery is considered desirable to maximise the ability for construction to be managed within the current boundaries of the site rather than the surrounding public roads.

The staggering of the final total dedication will allow for a construction zone serving Stage 4 in the eastern portion of the future open space area to be accommodated, but would not affect the light rail access in Stage 1.

## 5.0 Dwelling mix

A comparison of the Preferred Project Report (PPR) indicative dwelling mix and the indicative dwelling mix of Building 1A is provided in Table 1 below.

Number of bedrooms	Indicative PPR	Building 1A
1 bed	3.7%	17%
2 bed	82.2%	59.8%
3 bed	13.1%	18.8%
4 bed	0.9%	4.5%

Table 1: Dwelling mix comparison

The diversity of dwelling types is improved with an increase in the number of 1, 3 and 4 bedroom dwellings compared to the PPR mix. The greater diversity of accommodation provision is considered to be a positive outcome.

## 6.0 Affordable housing

A number of submissions raised the issue of the proposed affordable housing being offered to Marrickville Council and questioning the number of dwellings being provided. There has been a general misunderstanding regarding the three (3) affordable dwellings to be dedicated to Marrickville Council and that it is proposed that these dwellings be owned outright by Council rather than only be available for a period of ten (10) years.

The proposed dedication of three (3) dwellings outright is considered to be a more desirable outcome in providing an asset to the community with a capital value rather than a short term provision of rental accommodation.

In summary, the current terms of approval require ten (10) dwellings to be set aside as affordable rental housing for a period of ten (10) years (refer Statement of Commitments Item 15). At the expiry of ten (10) years the dwellings would no longer be affordable housing and would remain in the ownership of the proponent.

The modification seeks to replace the ten (10) temporary affordable rental dwellings with three (3) dwellings to be dedicated outright (i.e. no time restriction) to Marrickville Council. The three (3) dwellings would be affordable rental dwellings owned and managed by Council and do not have a ten (10) year time limit on their availability.

A comparison of the availability of affordable housing dwellings being dedicated has been calculated as follows:

Existing Approval (affordable housing dwellings with 10 year limit)  
 $300 \text{ dwellings} \times 0.033 = 10 \text{ affordable dwellings (10 years)} = \text{providing a total of 100 years of affordable housing}$

Proposed modification with no outright dedication (affordable housing dwellings with 10 year limit)  
 $380 \text{ dwellings} \times 0.033 = 13 \text{ affordable dwellings (10 years)} = \text{providing a total of 130 years of affordable housing.}$

Proposal (affordable housing dwellings dedicated to Council)  
 $3 \text{ dwellings} \times 60 \text{ years}^* = 180 \text{ years of affordable housing}$   
(\*60 years as an approximate lifespan of the apartments)

Therefore, the affordable housing commensurate to the increase in dwellings (80 additional dwellings) and keeping the current approval structure equates to a total of thirteen (13) affordable dwellings for ten (10) years, or 130 years of affordable housing.

The applicant has however offered to provide the affordable dwellings in perpetuity and has calculated that three (3) dwellings in perpetuity (calculated as the average lifespan of an apartment being 60 years) would provide for 180 years of affordable housing, significantly higher than that provided by the 13 affordable dwellings with a ten (10) year time limit (i.e. 130 years).

The second method of considering the proposed alternate offer is the capital value of the dedication. At the end of the ten year period of affordable rental housing, the community is not left with an asset with any capital value. The alternate approach dedicates up front an asset with a significant capital value which can be managed by Council as part of its on-going affordable housing program.

It is noted that Marrickville Council supported the dedication of the dwellings, rather than the ten (10) year cap on rentals. However, it requested that flexibility is provided and that there is no restriction on how Council manages the dwellings. This is a matter for the Consent Authority to consider for future development applications where affordable housing dwellings are conditioned. However, no objections are raised to Council being able to trade the units in future as part of its affordable housing program.

Council also noted in its submission that a range of dwelling sizes is preferred, with one (1) and two (2) bedroom apartments most needed.

As part of the revision to the s75W modification in response to submissions and the Department's assessment, a total of four (4) dwellings are to be dedicated comprising 2 x 1 bedroom dwellings and 2 x 2 bedroom dwellings.

## **7.0 Traffic generation and parking**

Many submissions raised traffic and car parking as objections against the requested modification.

It is reiterated that the range of traffic management upgrades proposed, such as the new roundabout at Edward and Smith Street and signalised intersection at Old Canterbury Road / Edward Street have arisen from detailed assessment and consideration of the traffic generation impacts of the proposed development. The requested modification to re-allocate land uses within the overall GFA cap reduces the overall peak traffic generation of the development.

It is further reiterated that all car parking generated by the proposed development must be provided off-street in the proposed basement car parking areas. Any proposed on-street car parking provided is in addition to any parking demand generated by the development. The requested reduction in on-street car parking does not equate to a reduction in car parking provided in response to demand generated by the development.

## **8.0 Construction impacts**

The issue of construction impacts on the local area has been raised in community submissions, with examples of disruption from current small development projects being highlighted and including litter, parking impact from construction workers, large vehicles parking on street and construction traffic management.

The Statement of Commitments (Item 1 – Construction Management) includes a commitment to prepare a Construction Management Plan (CMP) prior to the issue of any construction certificate. The CMP will provide management guidelines which will ensure disruption to the local community is minimised and managed throughout the construction period. The CMP will address construction traffic management and

public access. In addition, the condition of any future consent will specify hours in which construction can occur and detailed conditions relating to construction management.

We trust that the additional information provided addresses the matters raised and will allow the matter to be determined.

Should you wish to discuss any aspect of this submission, please do not hesitate to contact me on (02) 9380 9911 or by email at sbarwick@sjb.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Scott Barwick'.

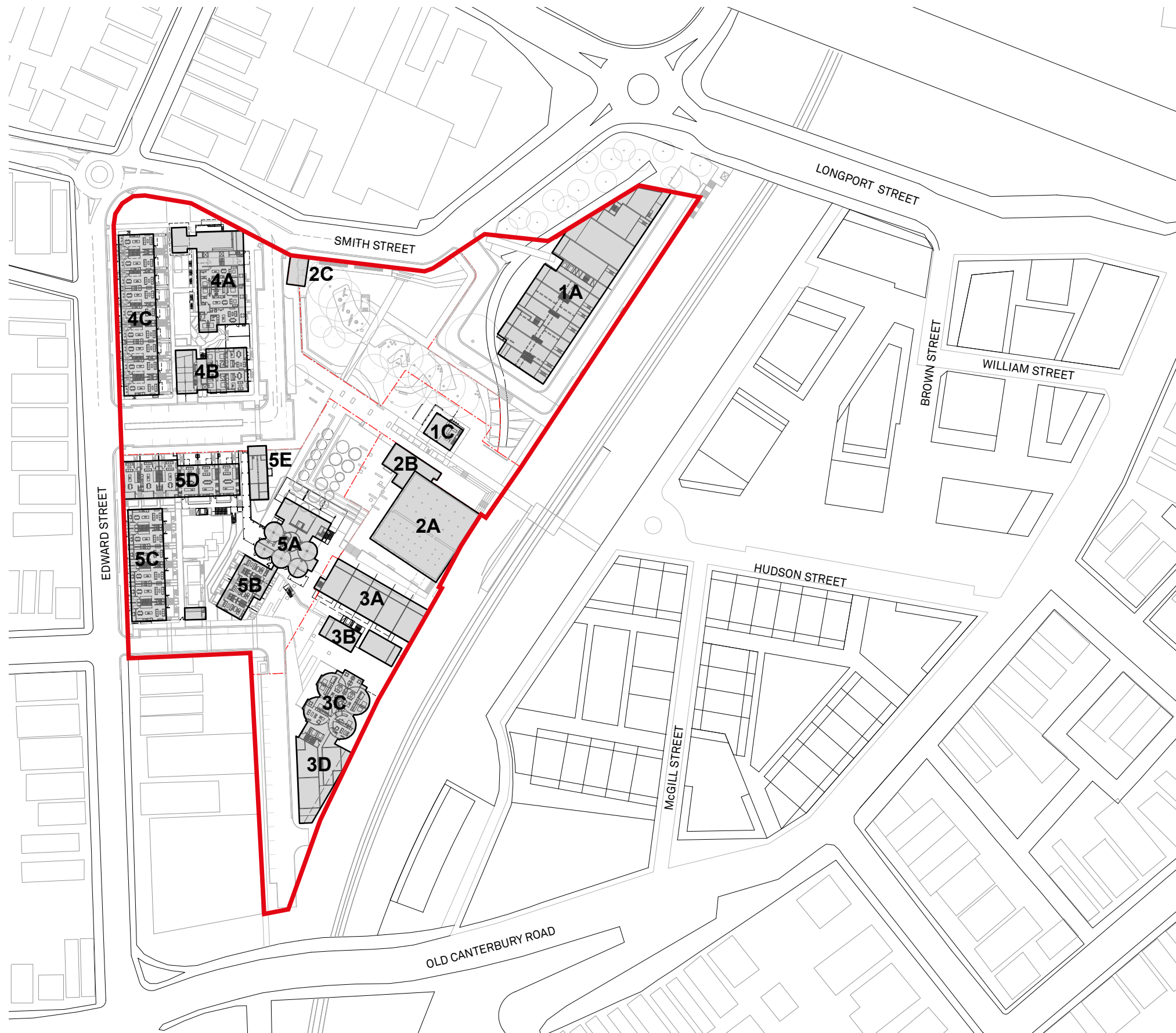
Scott Barwick  
Associate Director

Attachments:

- Attachment 1 – Revised architectural drawing package
- Attachment 2 – Summary table of submissions
- Attachment 3 – Revised Statement of Commitments



## Attachment 1: Architectural Drawing Package



## SUMMER HILL FLOUR MILL\_ BUILDING IDENTIFICATION PLAN

HASSELL



**Revision**  
Concept Plan Application  
Revised Submission  
Revised Submission  
Revised Submission

**Date**  
16 February 2011  
7 March 2014  
16 April 2014  
10 September 2014

**Scale**  
Not to scale

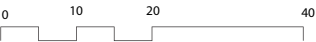
**Client**  
EG Funds Management

**Project Name**  
Summer Hill Flour Mill





SUMMER HILL FLOUR MILL CONCEPT PLAN



Revision	Date
01	23-March-2011
02	25-May-2012
03	15-February-2013
04	07-March-2014
05	16-April-2014
06	10-September-2014

Scale	Client
1:1000@A3	EG Funds Management
1:500@A1	

Project Name
Summer Hill Flour Mill
Sydney

Drawing
A-010
Masterplan

HASSELL





- 1-2 storeys (max)
- 2-3 storeys
- 4-6 storeys
- 7-8 storeys
- 9-13 storeys
- Site boundary

SUMMER HILL FLOUR MILL\_  
BUILDING HEIGHT

HASSELL



Revision	Date
Revised Submission	7 March 2014
Revised Submission	10 September 2014

Scale  
Not to scale

Client  
EG Funds Management

Project Name  
Summer Hill Flour Mill

Urban Design and Architectural Design Guidelines for Building 1A

Building Form

The building mass is configured in two parts, as a base and top, to relate to important heritage building, the Mungo Scott building. The base has been set to relate to the parapet height of the Mungo Scott building, while the element above relates to the upper stratum of the wider Summer Hill Flour Mill site, characterised by industrial forms and materials, typically resolved in light colours.

As a direct response, the detailed design for Building 1A will adopt a more solid base to relate to the scale of the Mungo Scott building, and will adopt a lighter, reflective quality to the upper element.

The centrally located circulation core proposed in Building 1A will be configured to bring a strong vertical emphasis to the building expression, and is intended to provide natural light and ventilation to the common circulation areas as well as signalling the building entry.

Building Materials

To respond to the immediate site context, the base of Building 1A will utilise a deep red-coloured brick as the predominant building material in order to relate strongly to the Mungo Scott building. The new Building 1A base may also incorporate secondary architectural elements of painted render, consistent with the Mungo Scott building’s parapet.

The upper portion of Building 1A will adopt a material quality consistent with other industrial elements across the Summer Hill Flour Mill site. The new building will utilise framed elements, generally in lighter colours and occasionally using reflective metallic elements and screens.

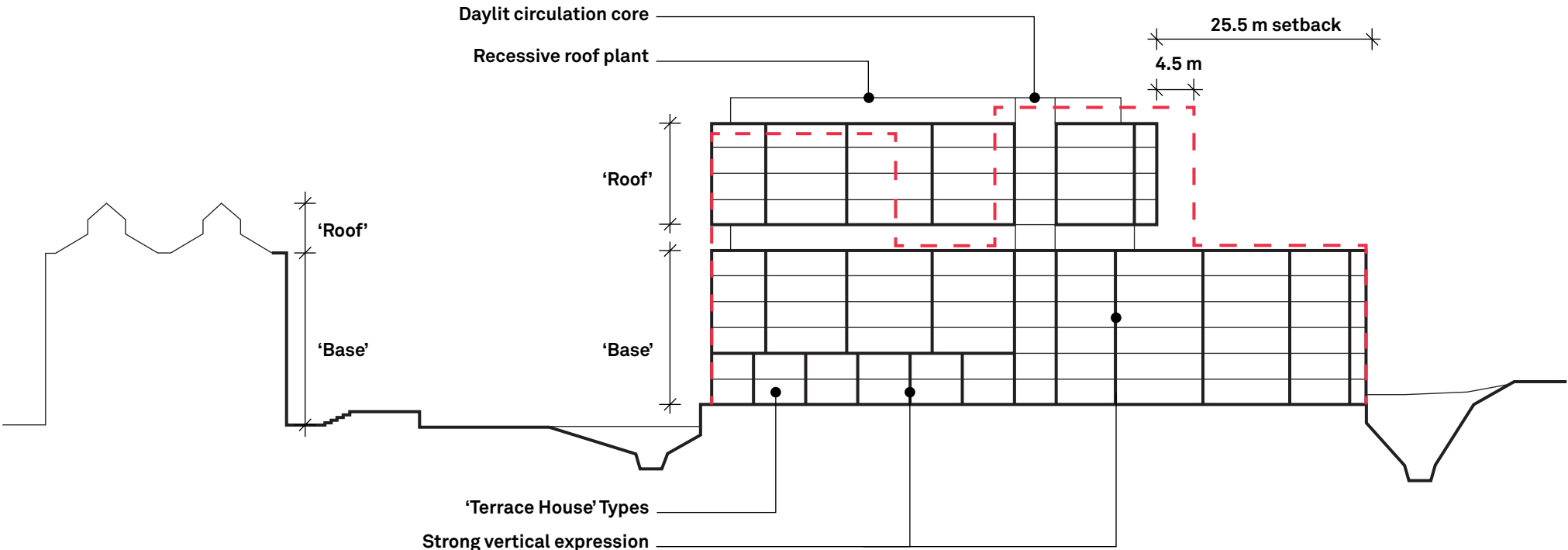
Architectural Detail

The Building 1A base will use brick as the predominant building material adopting a sense of depth and solidity consistent with the treatment of the Mungo Scott building. The secondary scaling elements within the base will strike an overall vertical emphasis within the otherwise strongly horizontal brick base.

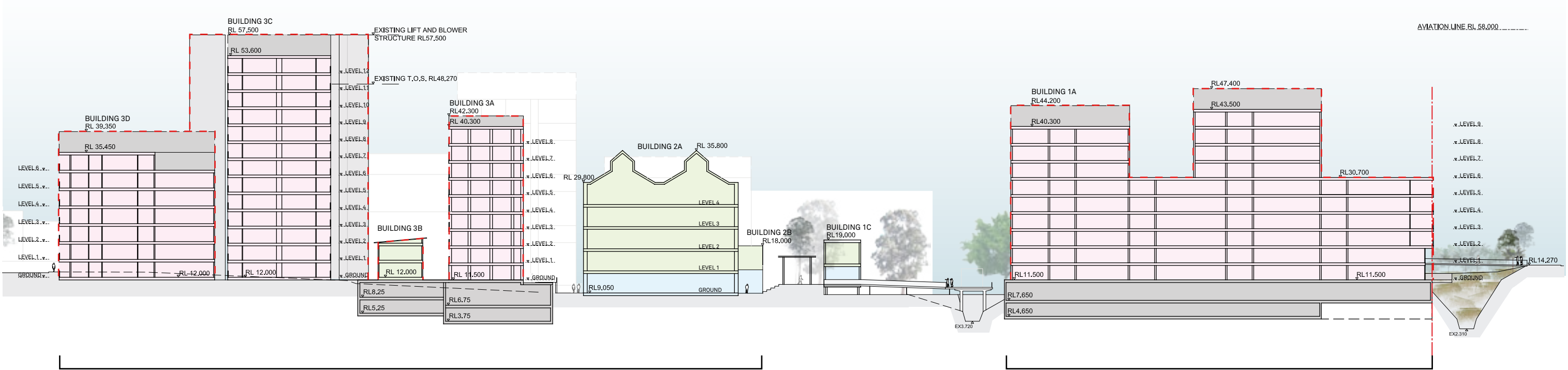
The Building 1A top will use lighter coloured architectural elements and will adopt a framed expression. The secondary scaling elements will balance both the vertical and horizontal to maintain the intention for the building top to reflect the framed, metallic and light coloured quality of the adjacent industrial site. The top of Building 1A will also incorporate a language of screens to provide shade and shelter.

Design Excellence

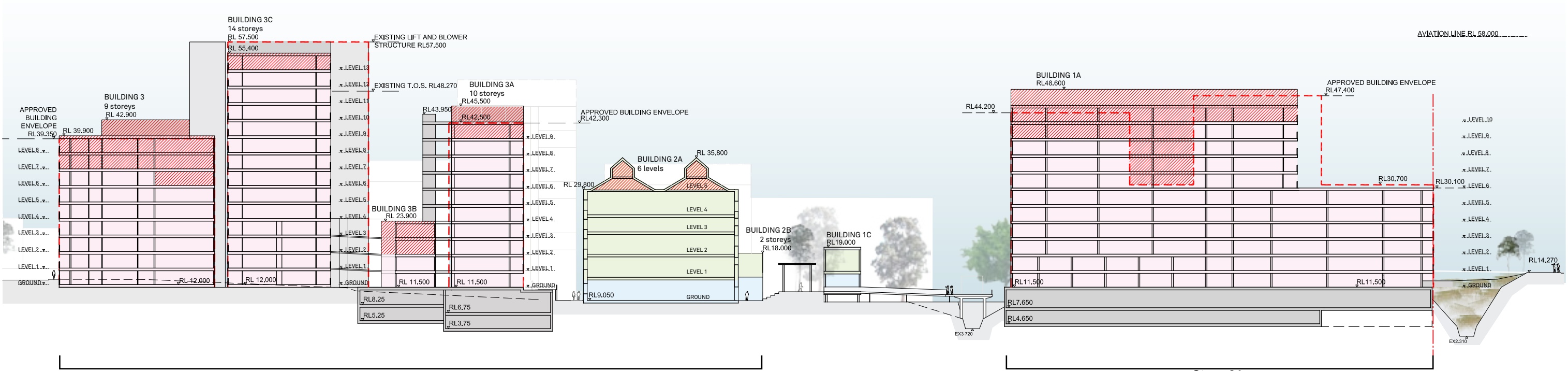
In order to achieve project continuity and maintain design excellence, the Development Application for Building 1A will be designed by the author of the approved Concept Plan. The incumbent design practice – HASSELL – has been recognised for design quality over many years of sustained output. In addition, the DA will be subject to the established design review processes at Marrickville Council and be reviewed by their Architectural Excellence Panel through the assessment stage.



SUMMER HILL FLOUR MILL\_  
DESIGN PRINCIPLES FOR BUILDING 1A



Approved Building Envelopes



Proposed Building Envelopes

# SUMMER HILL FLOUR MILL\_ SECTIONS

SHEET 01

HASSELL

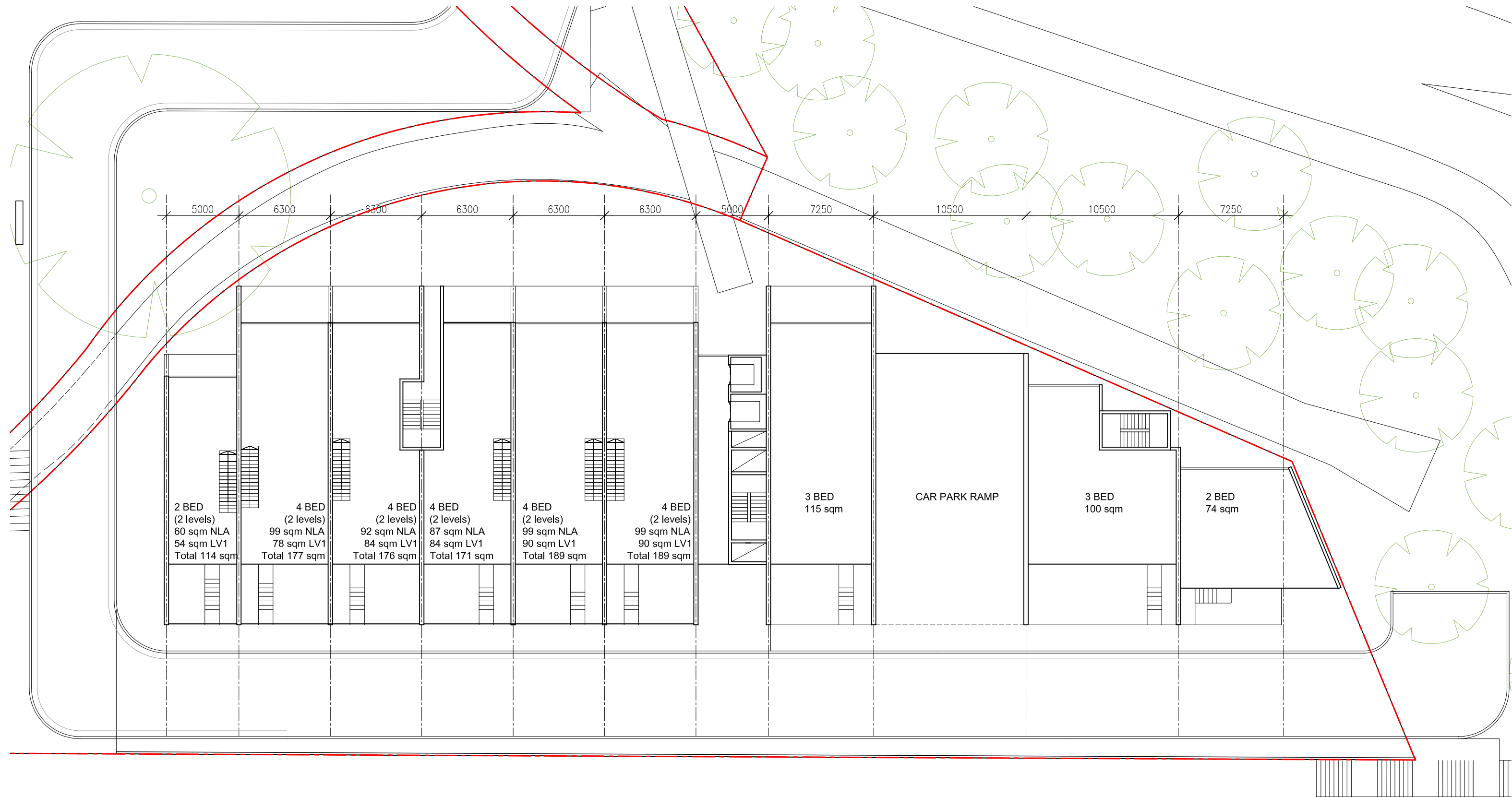
Revision  
Revised Submission

Date  
29 August 2014

Scale  
Not to scale

Client  
EG Funds Management

Project Name  
Summer Hill Flour Mill



SUMMER HILL FLOUR MILL\_  
BUILDING 1A INDICATIVE PLAN  
GROUND FLOOR PLAN

HASSELL



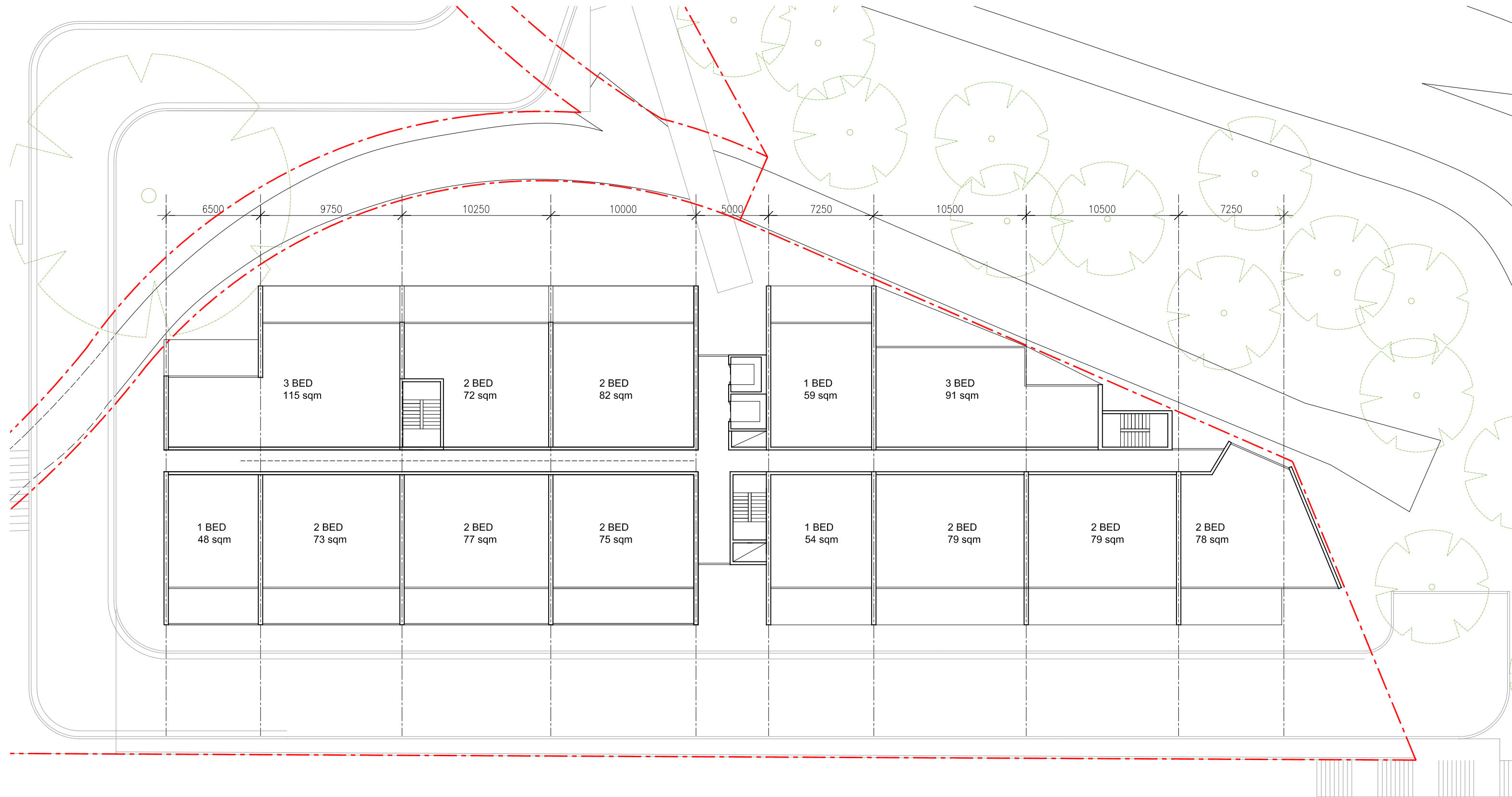
Revision  
Revised Submission

Date  
10 September 2014

Scale  
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Client  
EG Funds Management

Project Name  
Summer Hill Flour Mill



**VSUMMER HILL FLOUR MILL\_**  
**BUILDING 1A INDICATIVE PLAN**  
TYPICAL LOWER FLOOR PLAN



**Revision**  
Revised Submission

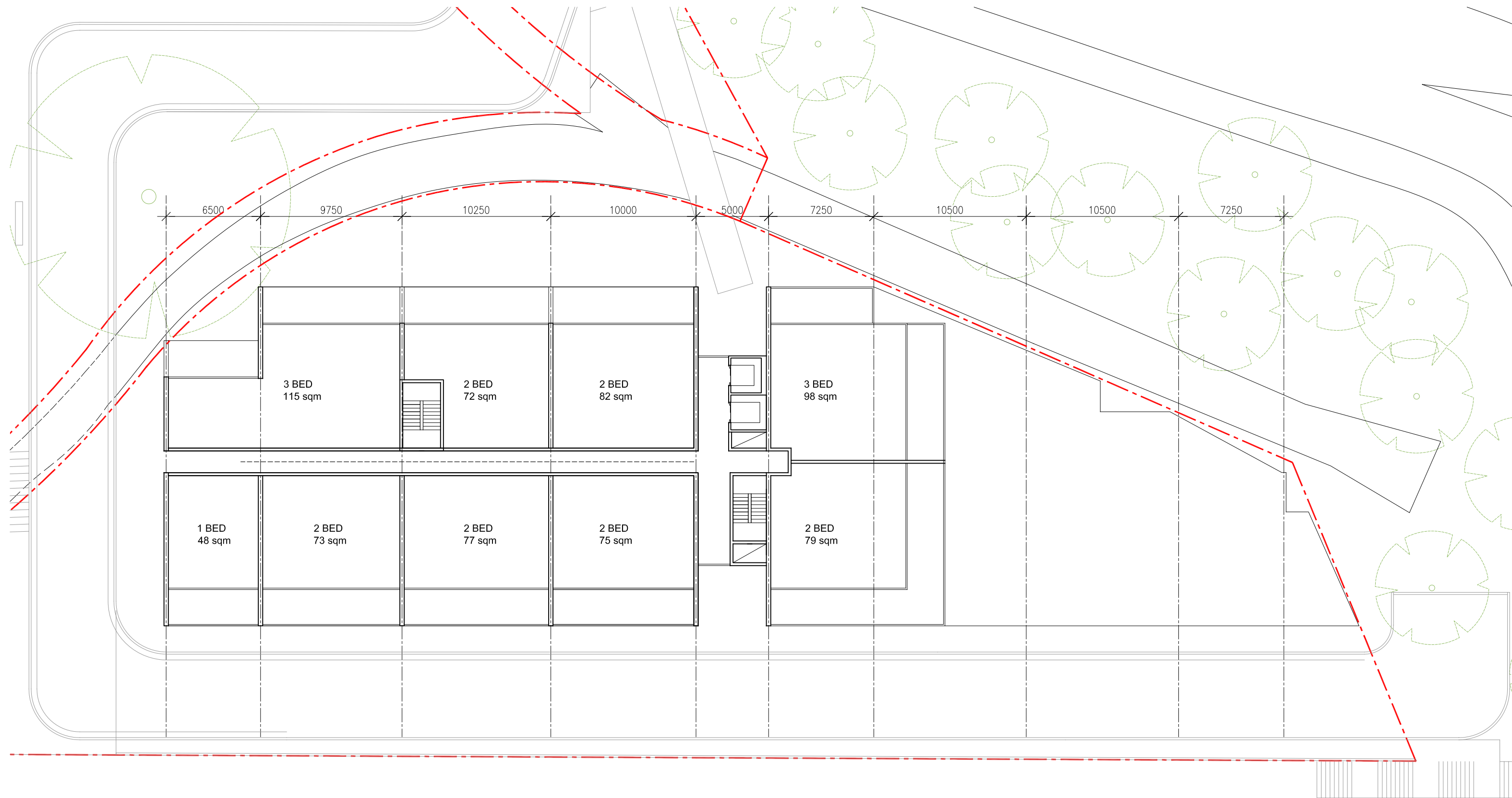
**Date**  
10 September 2014

**Scale**  
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**Client**  
EG Funds Management

**Project Name**  
Summer Hill Flour Mill





SUMMER HILL FLOUR MILL\_  
BUILDING 1A INDICATIVE PLAN  
TYPICAL UPPER FLOOR PLAN



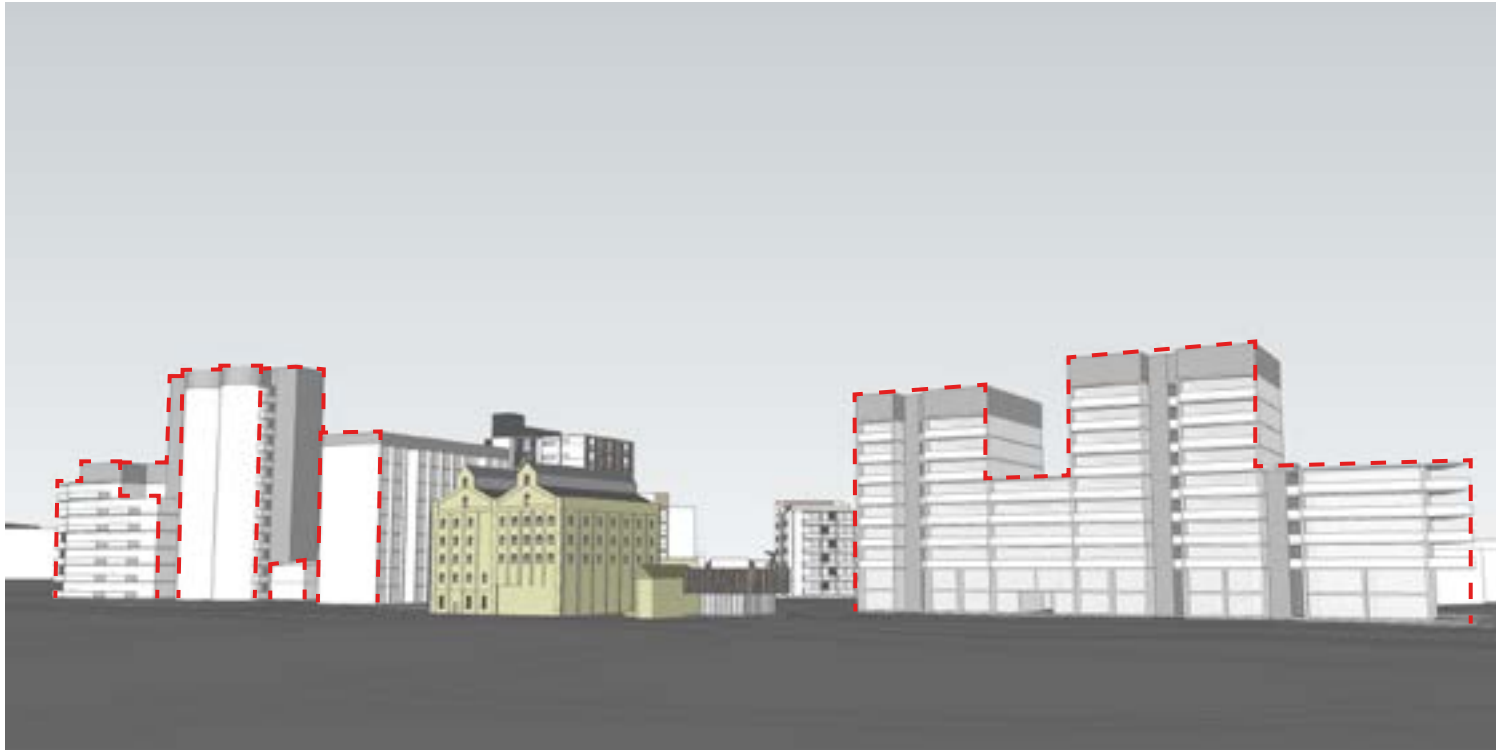
Revision  
Revised Submission

Date  
10 September 2014

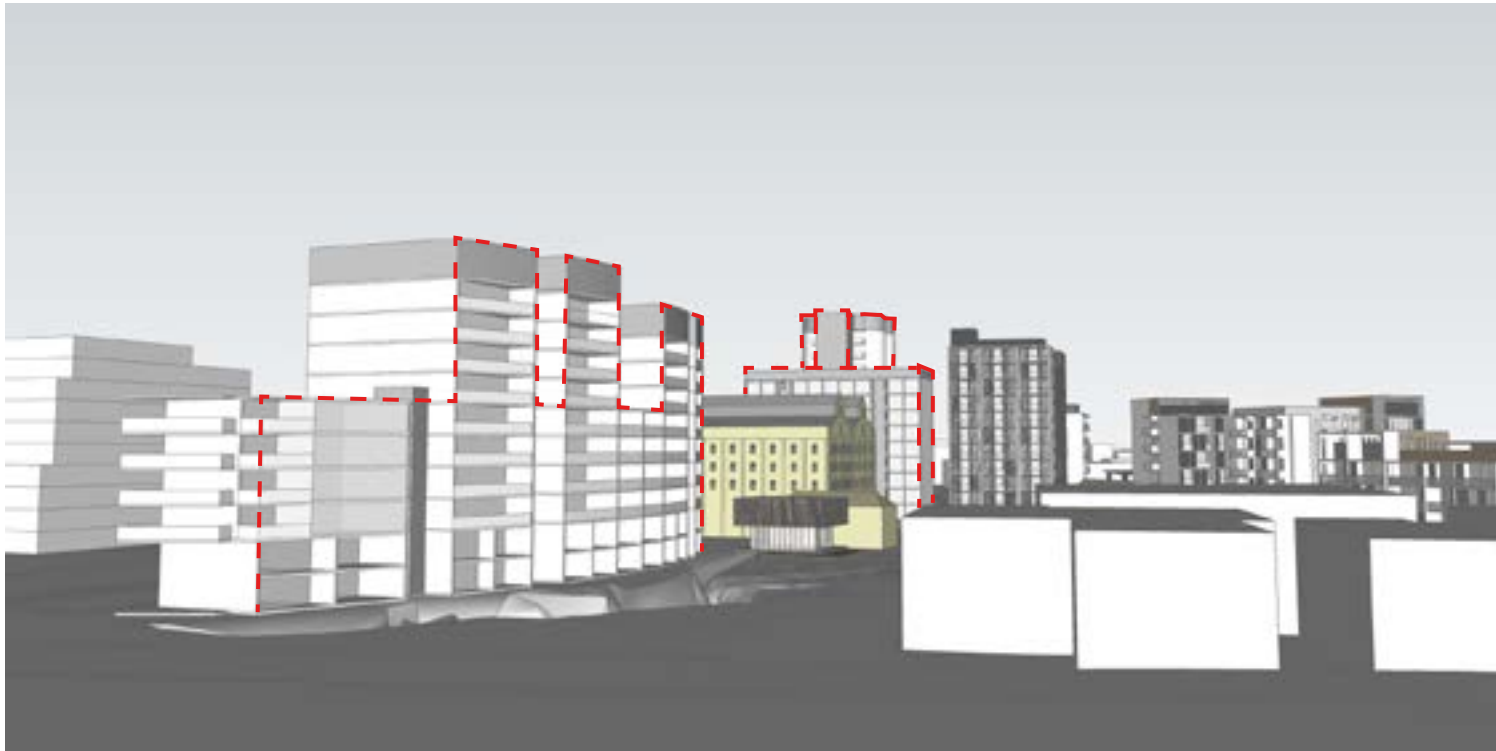
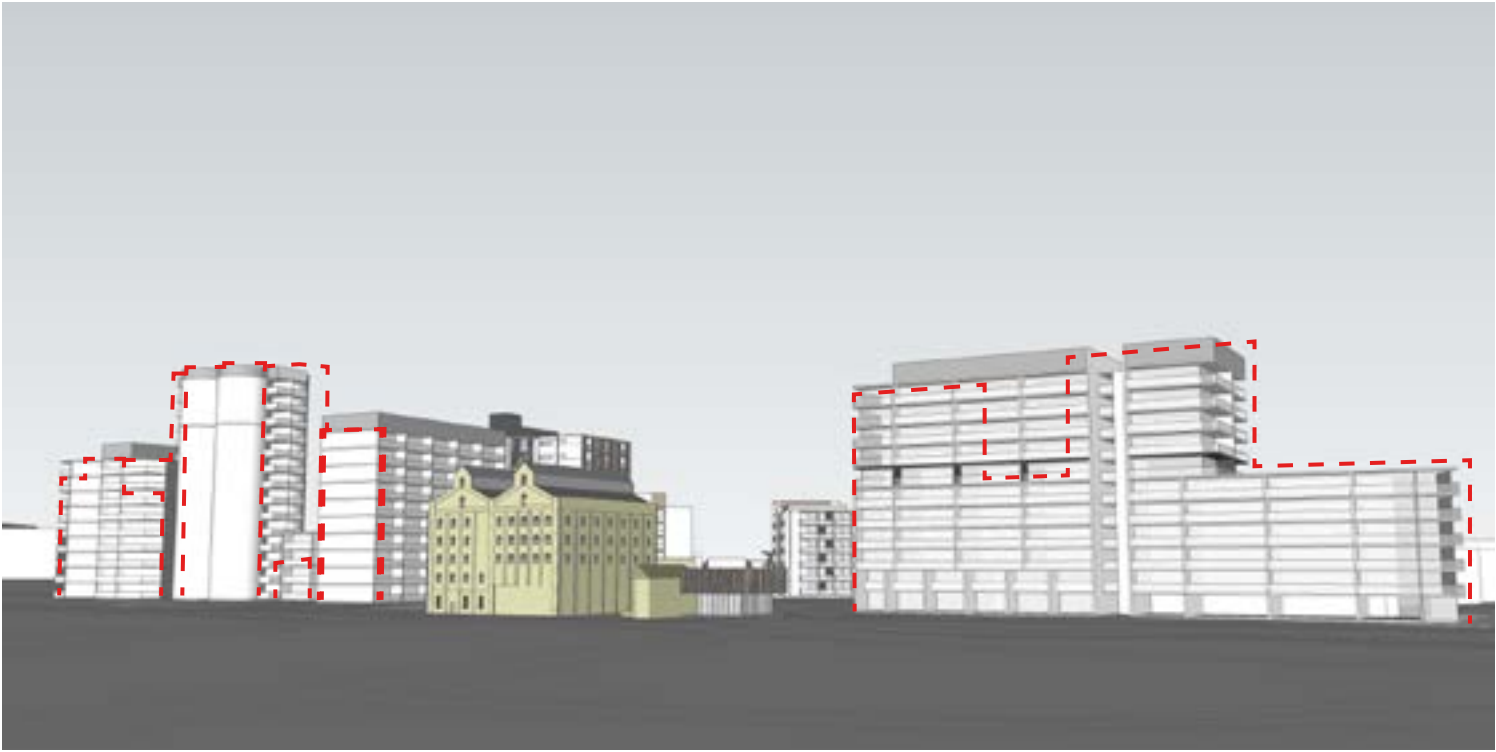
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Client  
EG Funds Management

Project Name  
Summer Hill Flour Mill



View from the East (Approved)



View from Longport Street (Approved)

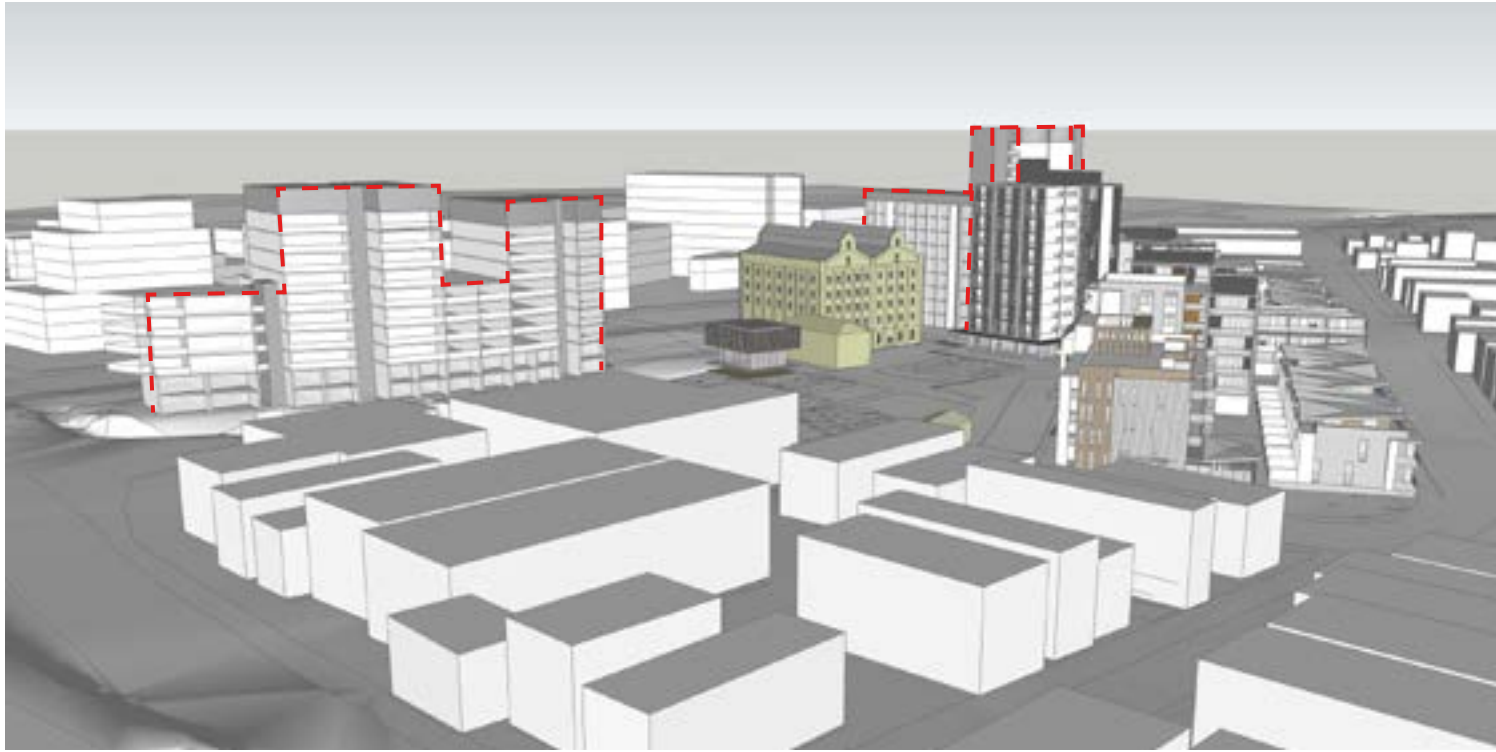


View from Longport Street (Proposed)

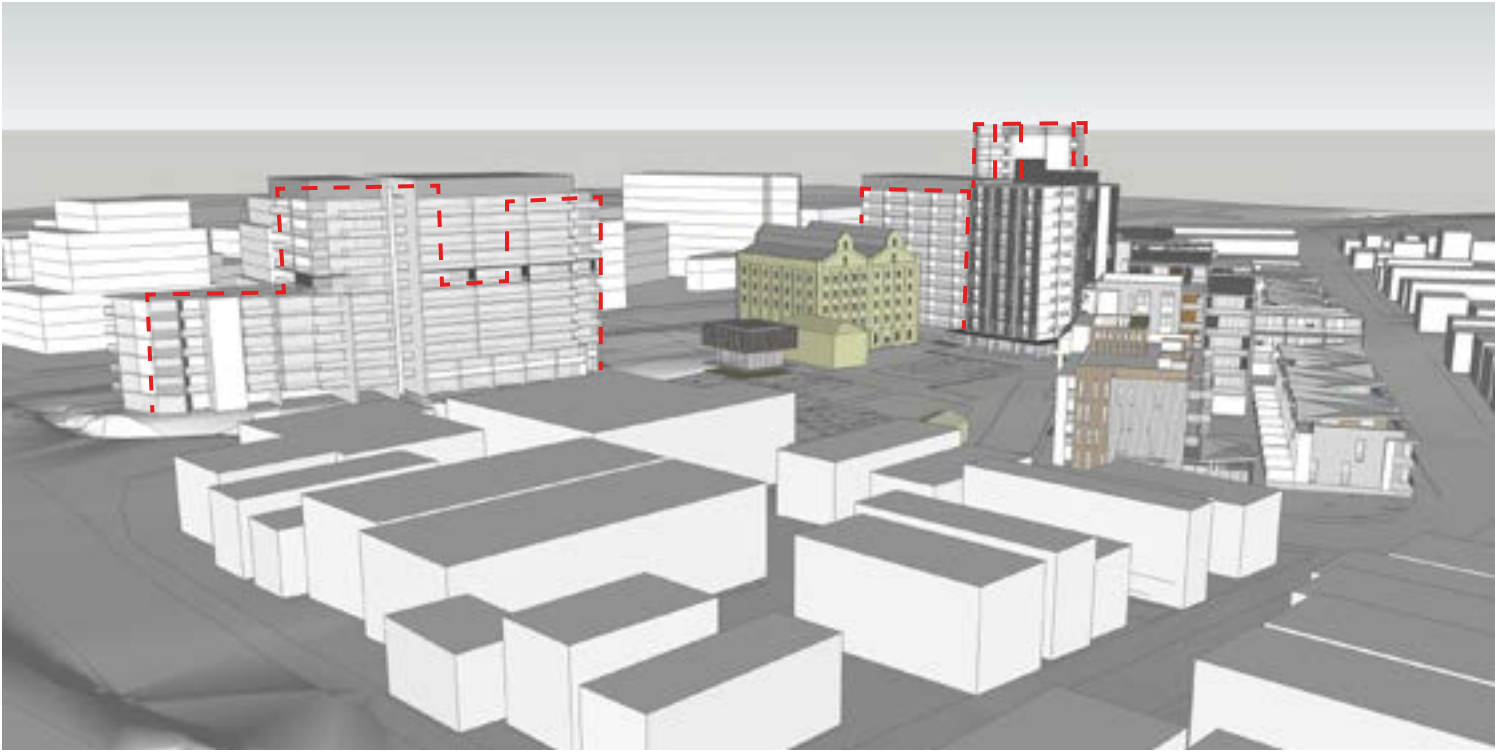
SUMMER HILL FLOUR MILL\_  
VIEW ANALYSIS  
SHEET 01

HASSELL

Revision	Date	Scale	Client	Project Name
Revised Submission	7 March 2014	Not to scale	EG Funds Management	Summer Hill Flour Mill
Revised Submission	16 April 2014			
Revised Submission	10 September 2014			



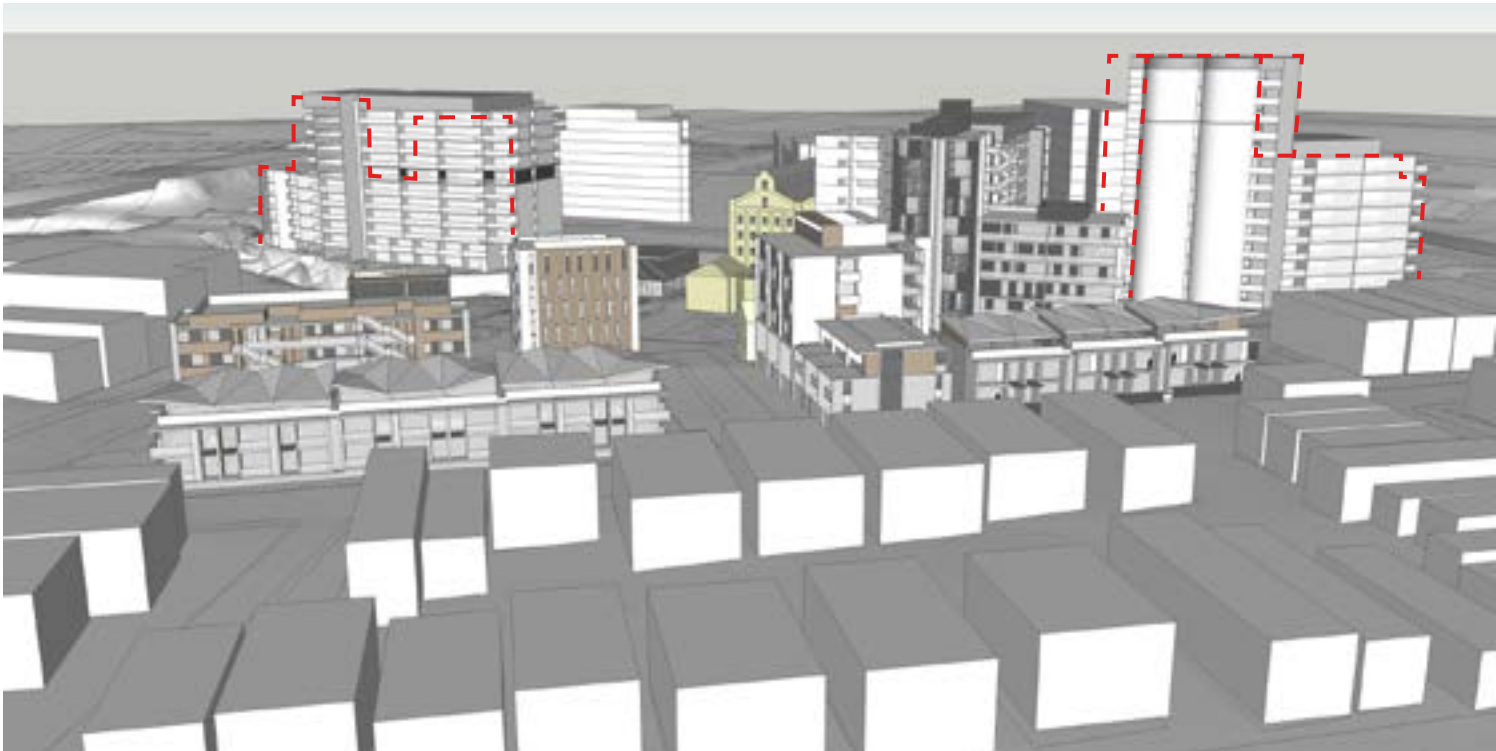
View from Carlton Crescent (Approved)



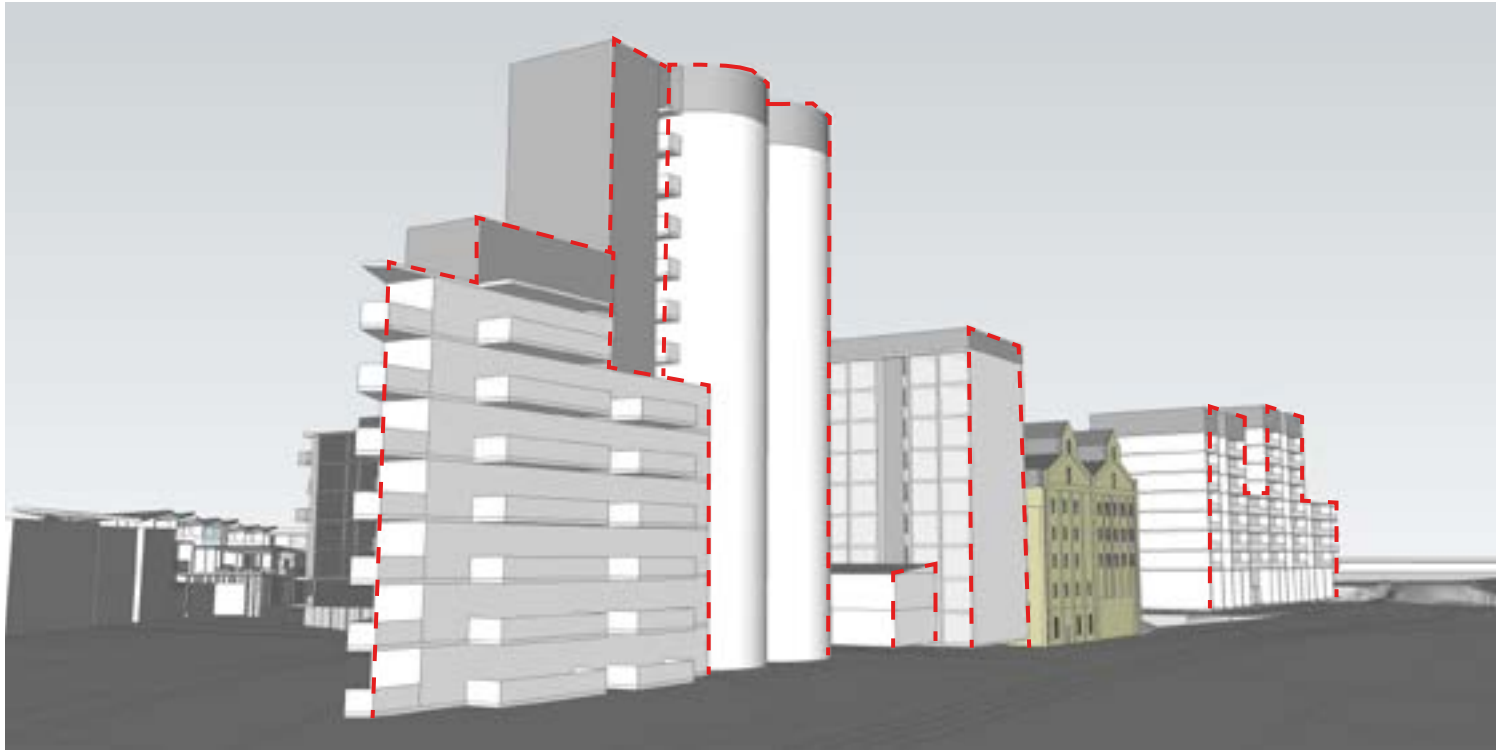
View from Carlton Crescent (Proposed)



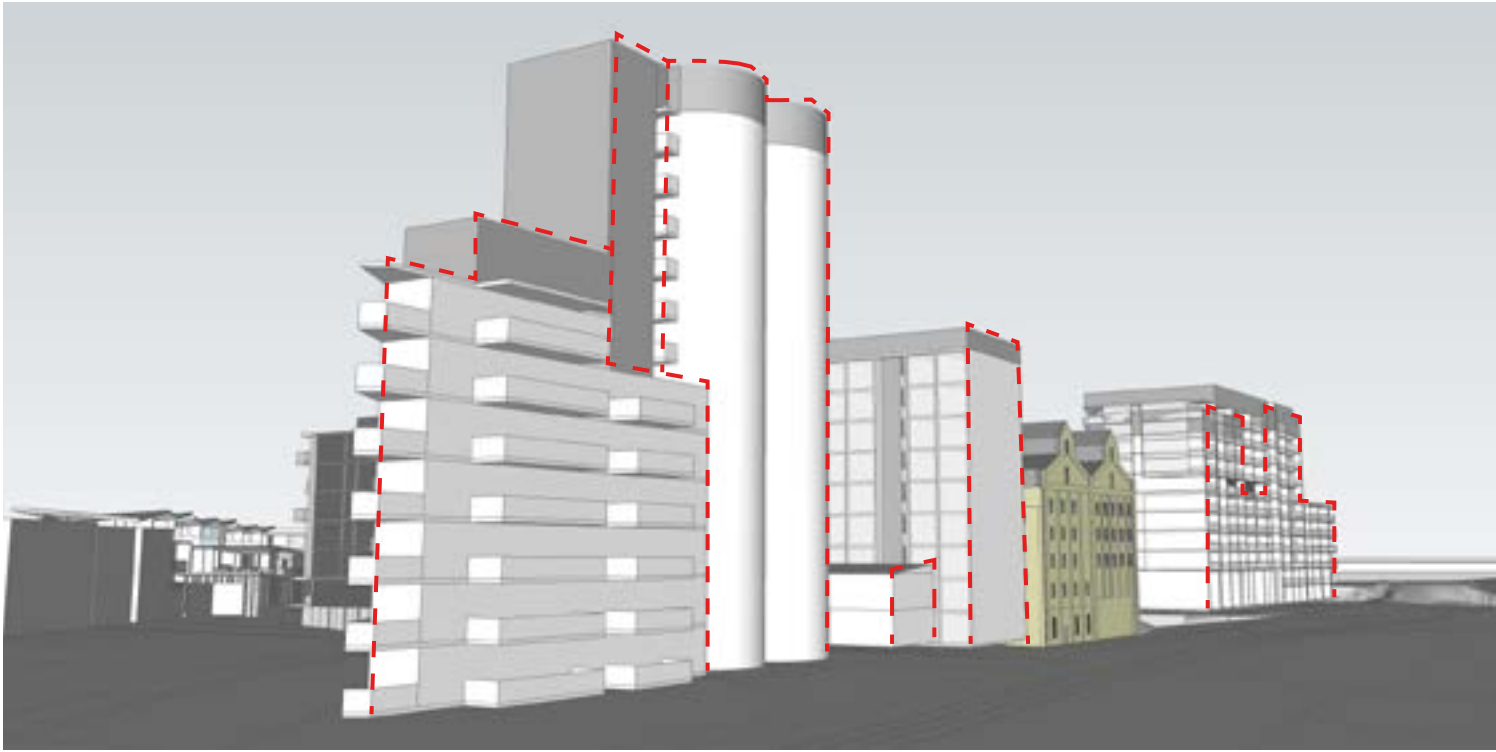
View from the West (Approved)



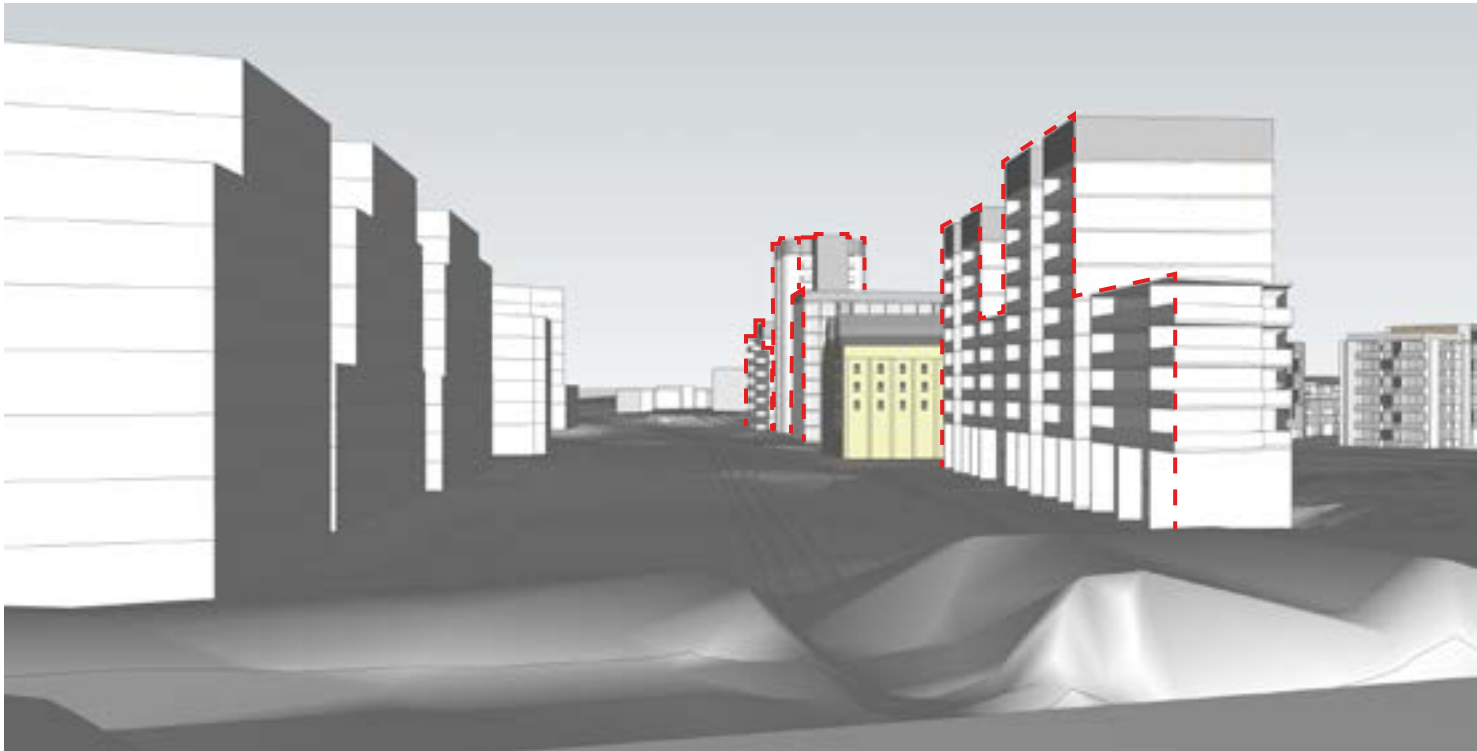
View from the West (Proposed)



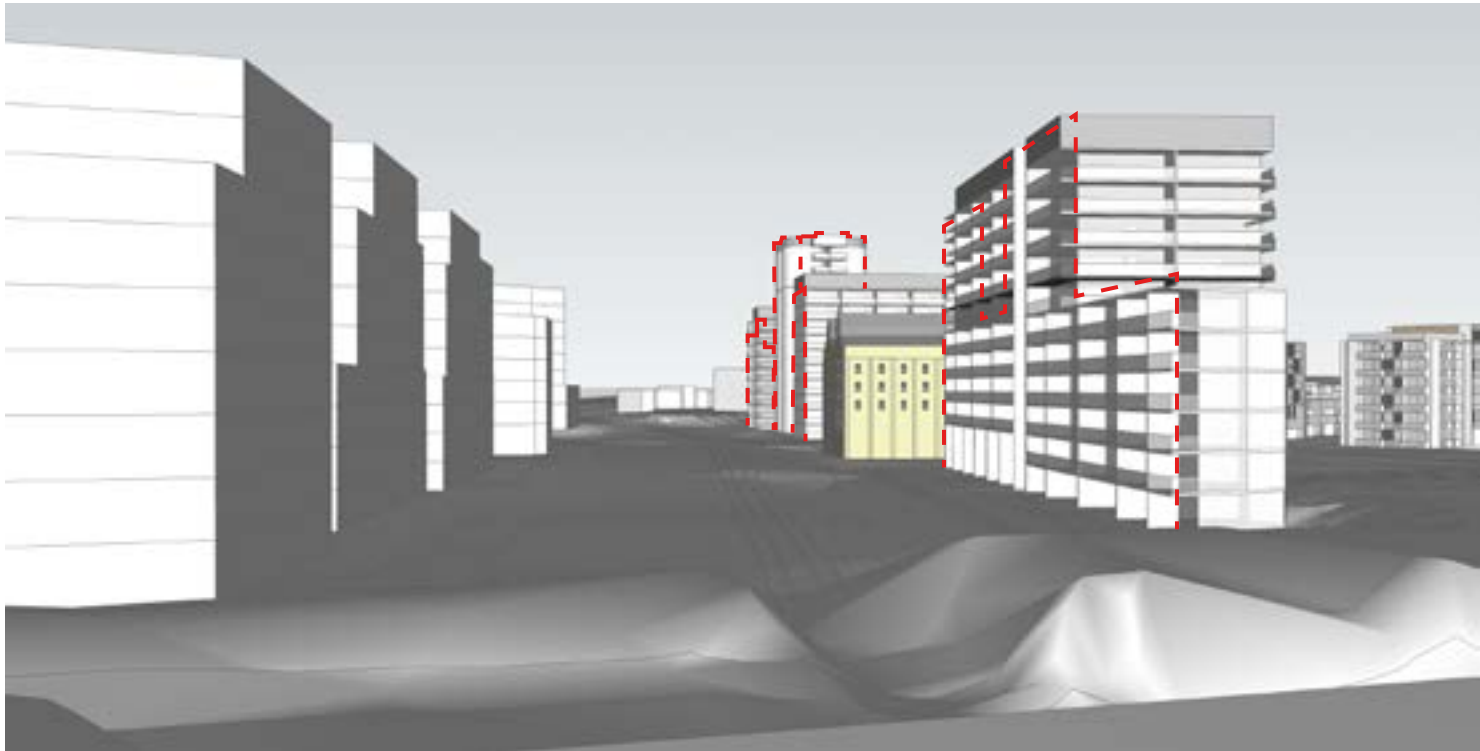
View from bridge along Old Canterbury Road (Approved)



View from bridge along Old Canterbury Road (Proposed)



View from bridge along Longport Street (Approved)



View from bridge along Longport Street (Proposed)





This visualisation is to highlight the architectural potential of Building 1A in Stage 4 within the proposed modified building envelope. The proposed modified building envelopes for Buildings 3A, 3B, 3C and 3D in Stage 3 are illustrated as indicative building forms only.





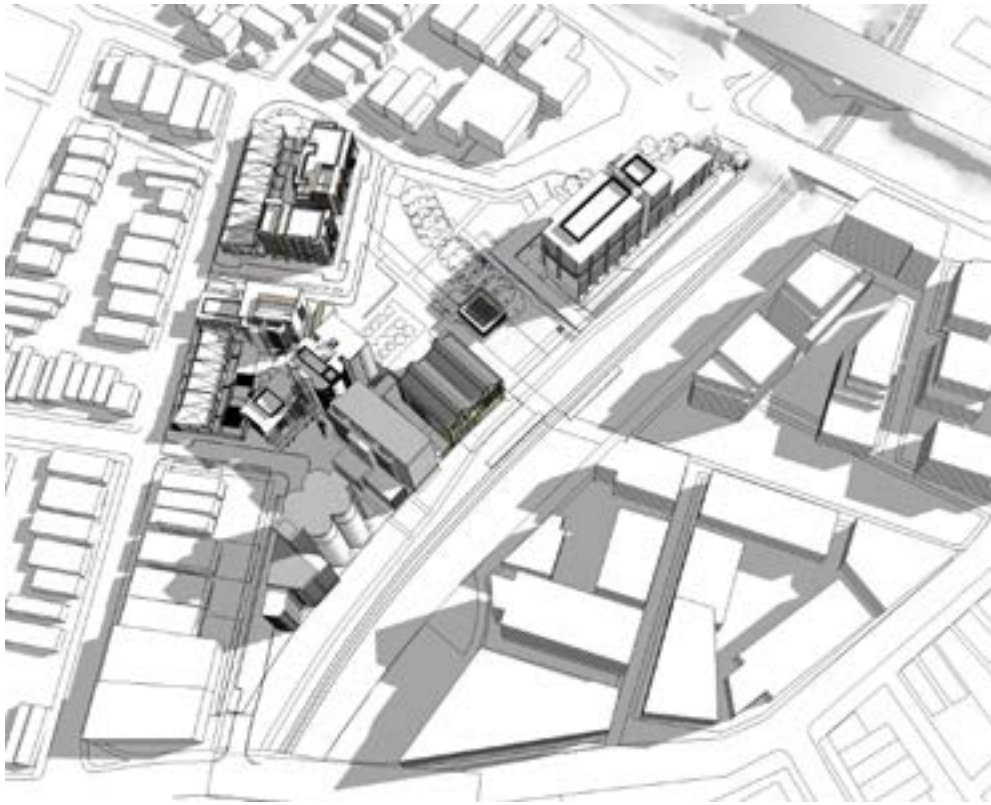
This visualisation is to highlight the architectural potential of Building 1A in Stage 4 within the proposed modified building envelope. The proposed modified building envelopes for Buildings 3A, 3B, 3C and 3D in Stage 3 are illustrated as indicative building forms only.

SUMMER HILL FLOUR MILL\_  
VISUALISATION  
SHEET 02

HASSELL

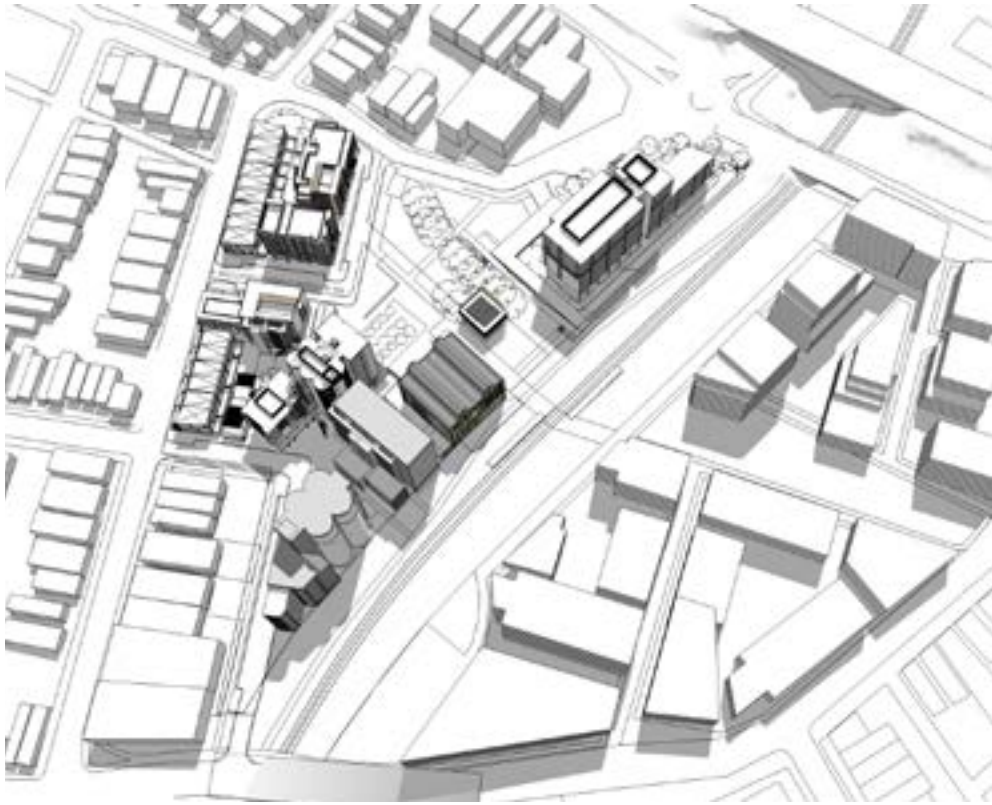
Revision	Date	Scale	Client	Project Name
Revised Submission	7 March 2014	Not to scale	EG Funds Management	Summer Hill Flour Mill
Revised Submission	16 April 2014			
Revised Submission	10 September 2014			



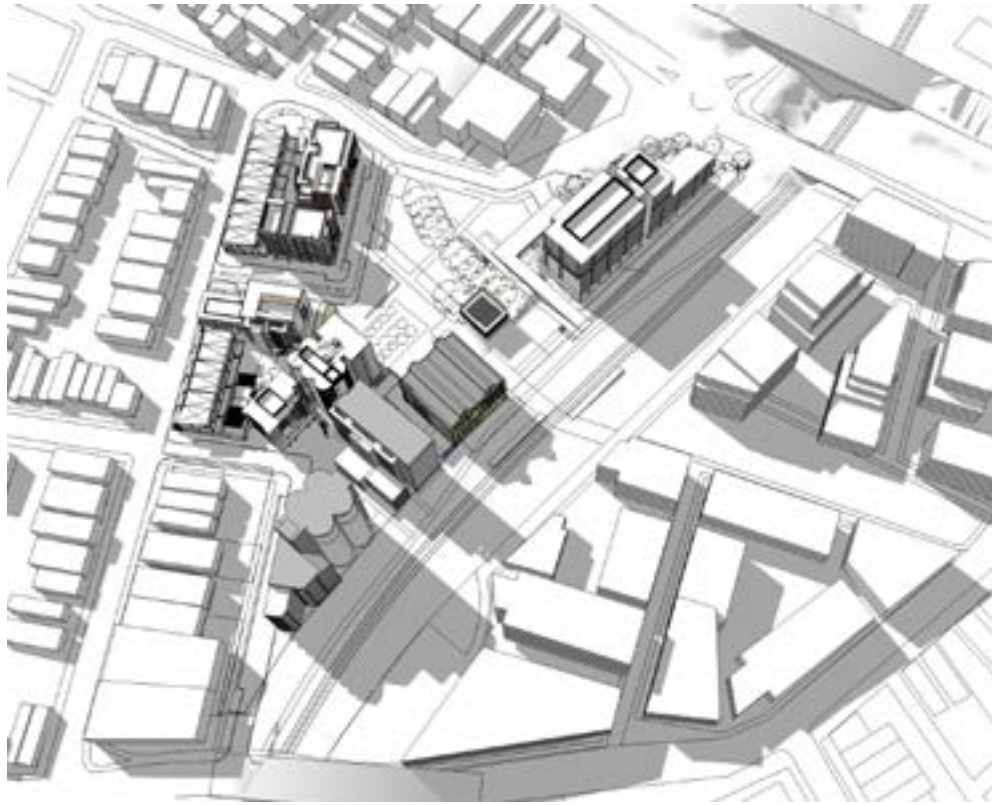


Equinox 21 March/September

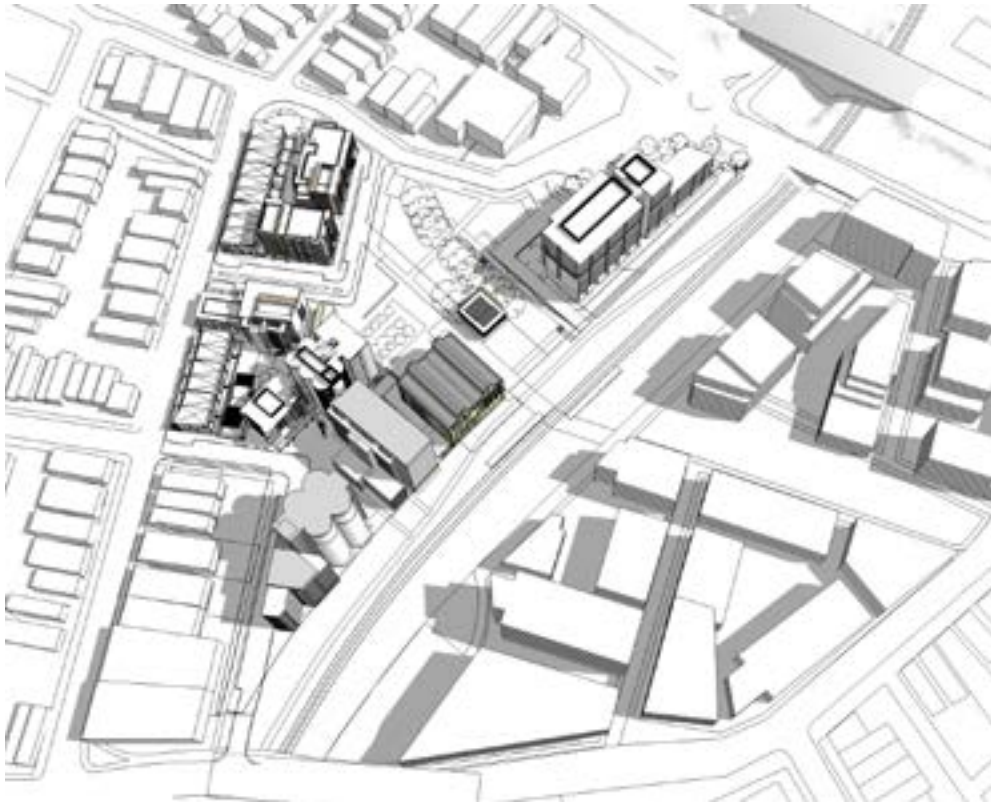
9 am



Midday

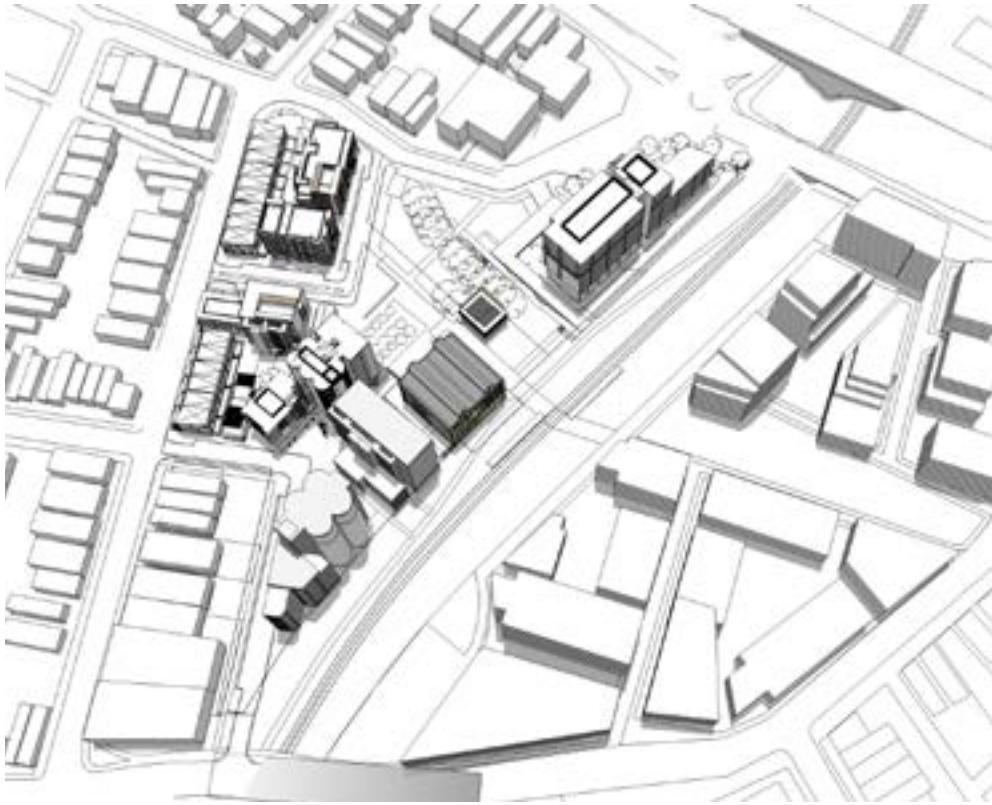


3 pm

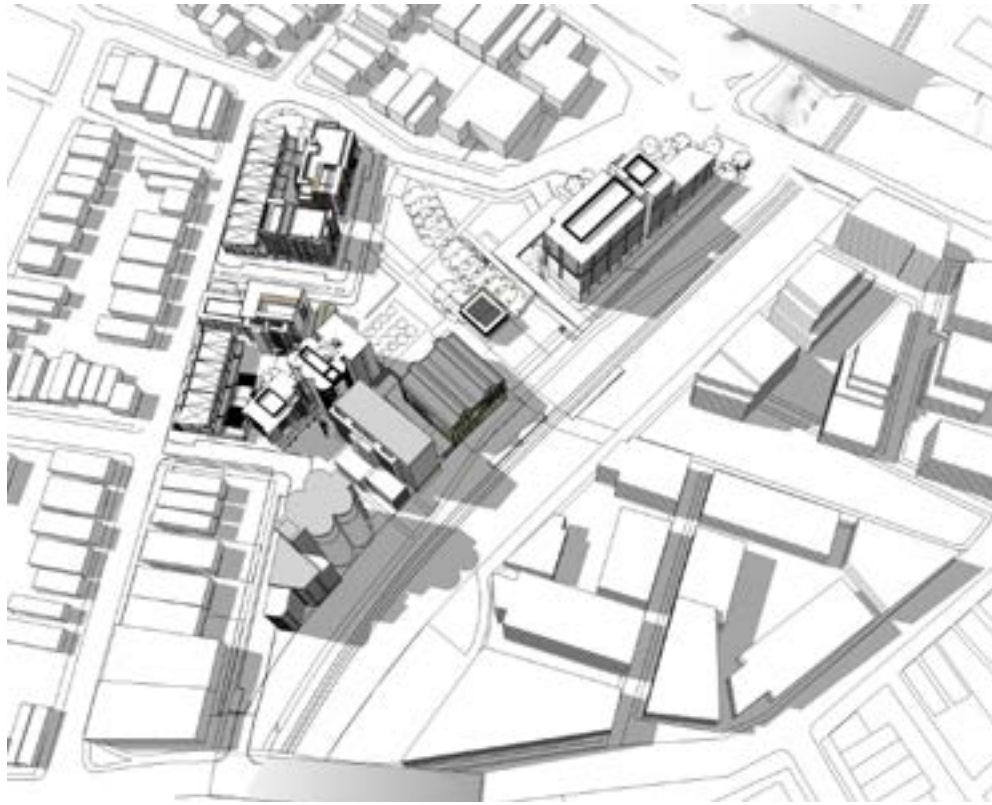


Summer 21 December

9 am



Midday



3 pm

SUMMER HILL FLOUR MILL\_  
SUN STUDY  
SHEET 01

HASSELL

Revision  
Revised Submission  
Revised Submission

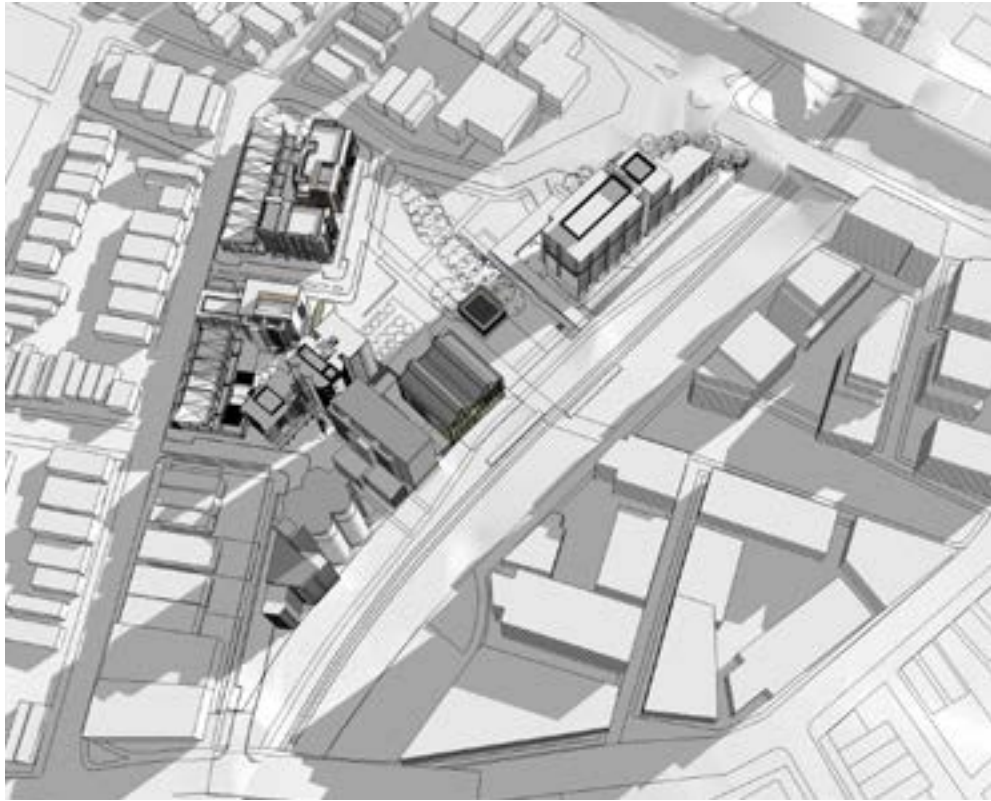
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10 September 2014

Scale  
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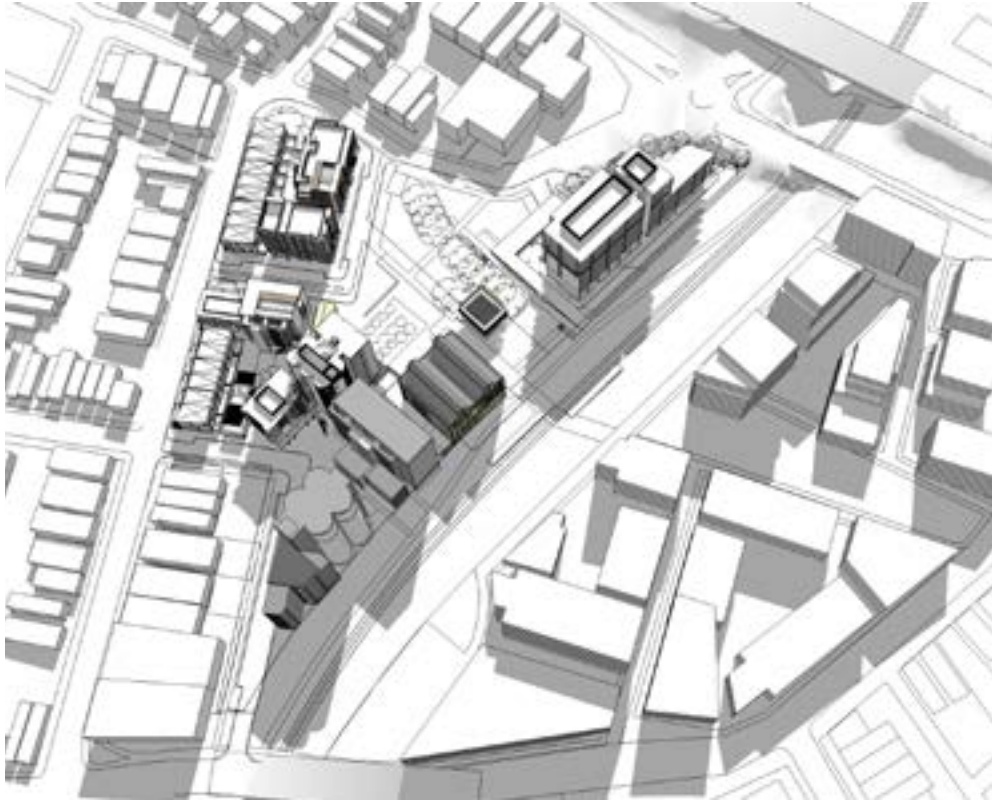
Client  
EG Funds Management

Project Name  
Summer Hill Flour Mill

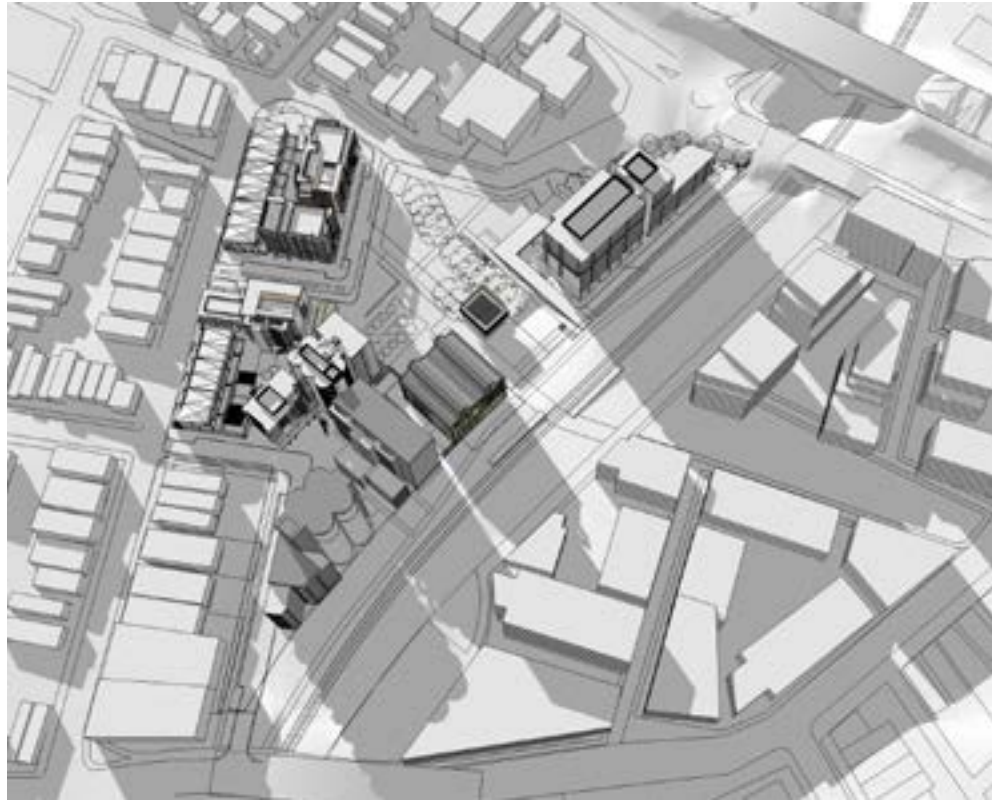




Winter 21 June 9 am



Midday



3 pm



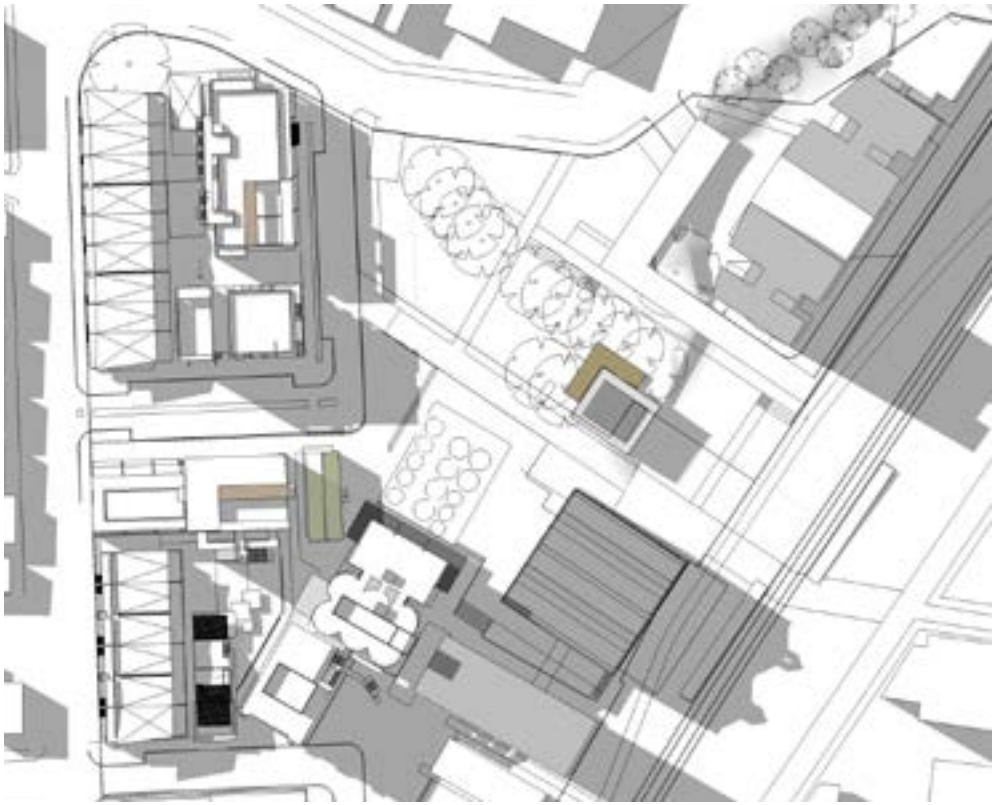


Equinox 21 March/September (Approved)

9 am



Midday



3 pm

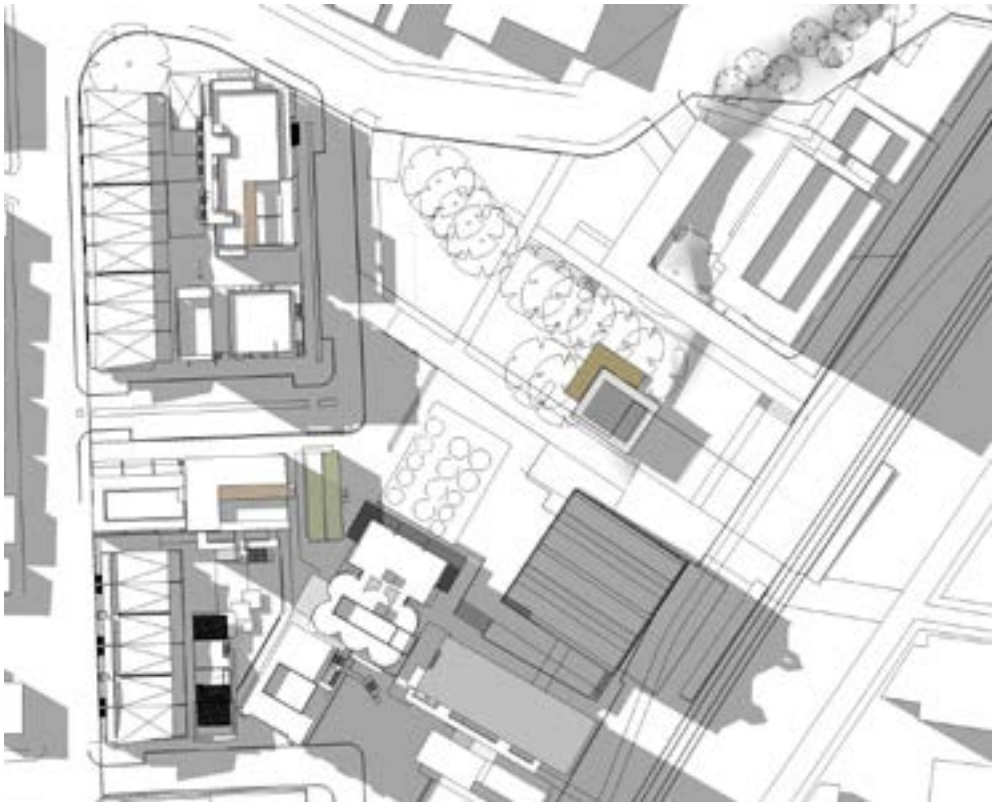


Equinox 21 March/September (Proposed)

9 am



Midday



3 pm

**SUMMER HILL FLOUR MILL\_**  
**SUN STUDY - MUNGO SCOTT BUILDING**  
 SHEET 01

HASSELL

Revision	Date	Scale	Client	Project Name
Revised Submission	10 September 2014	Not to scale	EG Funds Management	Summer Hill Flour Mill





Summer 21 December (Approved)

9 am



Midday



3 pm



Summer 21 December (Proposed)

9 am



Midday



3 pm

SUMMER HILL FLOUR MILL\_  
SUN STUDY - MUNGO SCOTT BUILDING  
SHEET 02

HASSELL

Revision	Date	Scale	Client	Project Name
Revised Submission	10 September 2014	Not to scale	EG Funds Management	Summer Hill Flour Mill





Winter 21 June (Approved)

9 am



Midday



3 pm



Winter 21 June (Proposed)

9 am



Midday



3 pm

SUMMER HILL FLOUR MILL\_  
SUN STUDY - MUNGO SCOTT BUILDING  
SHEET 03

HASSELL

Revision	Date	Scale	Client	Project Name
Revised Submission	10 September 2014	Not to scale	EG Funds Management	Summer Hill Flour Mill

	Stage 1	
	3 hours Solar Access	Cross Ventilation
4A	100% 18 Apartments	100% 18 Apartments
4B	100% 17 Apartments	100% 17 apartments
4C	89% 8 Terraces	100% 9 Terraces
Stage 1 Total Dwelling: 44		

	Stage 2	
	3 hours Solar Access	Cross Ventilation
5A	87% 39 apartments	100% 45 apartments
5B	64% 9 apartments	100% 14 apartments
5C	100% 6 terraces	100% 6 terraces
5D	83% 15 apartments	100% 18 apartments
Stage 2 Total Dwelling: 83		

		Stage 4 Building 1A				
		2 hours Solar Access		3 hours Solar Access	4 hours Solar Access	5 hours Solar Access
Level 10	1C-10.9	√		√	√	√
	1C-10.8	√		√	√	√
	1C-10.7	√		√	√	√
	1C-10.6	√		-	-	-
	1C-10.5	√		-	-	-
	1C-10.4	√		-	-	-
	1C-10.3	√		-	-	-
	1C-10.2	√		√	√	√
	1C-10.1	√		√	√	√
Levels 6-9	1C-6.9	√		√	√	√
	1C-6.8	√		√	√	√
	1C-6.7	√		√	√	√
	1C-6.6	√		-	-	-
	1C-6.5	√		-	-	-
	1C-6.4	√		-	-	-
	1C-6.3	√		-	-	-
	1C-6.2	√		√	√	√
	1C-6.1	√		√	√	√
Levels 2-5	1C-2.13	√		√	√	√
	1C-2.12	√		√	√	√
	1C-2.11	√		√	√	√
	1C-2.10	√		-	-	-
	1C-2.9	√		-	-	-
	1C-2.8	√		-	-	-
	1C-2.7	√		-	-	-
	1C-2.6	√		-	-	-
	1C-2.5	√		-	-	-
	1C-2.4	√		-	-	-
Level 1	1C-2.3	√		√	√	√
	1C-2.2	√		√	√	√
	1C-2.1	√		√	√	√
	1C-1.6	√		-	-	-
	1C-1.5	√		-	-	-
	1C-1.4	√		-	-	-
	1C-1.3	√		√	√	√
	1C-1.2	√		√	√	√
	1C-1.1	√		√	√	√
Ground	1C-G.3	√		√	√	√
	1C-G.2	√		√	√	√
	1C-G.1	√		√	√	√
	1C-T6	√		√	√	√
	1C-T5	√		√	√	√
	1C-T4	√		√	√	√
	1C-T3	√		√	√	√
	1C-T2	√		√	√	√
	1C-T1	√		√	√	√
Stage 4 Total Dwellings 112 dwellings		100.00% 112 dwellings		54.40% 61 dwellings	54.40% 61 dwellings	54.40% 61 dwellings

The solar access study is carried out between sunrise and 3 pm in mid winter.

The solar access study is carried out between 9 am and 3 pm in mid winter.

SUMMER HILL FLOUR MILL\_  
SOLAR ACCESS & CROSS VENTILATION CALCULATION

## Attachment 2: Summary Table of Submissions



The following provides a summary of the submissions received during the public exhibition of the proposed Modification to MP10\_0155 (MOD 1) Redevelopment of the Former Allied Mills Site for the purposes of a mixed use residential, commercial and retail development. A detailed response to the issues raised is included in the table and in the covering letter. A total of 21 submissions were received, including from:

- Ashfield Council
- Marrickville Council
- Heritage Branch, Office of Environment & Heritage
- Transport for NSW
- Austgrid
- Community Submissions (16 submissions)

The summary of issues raised during the consultation has been provided by the Department of Planning & Environment (letter dated 21/7/14) and this has also been addressed in the table below and covering letter.

Submission	Comments	Response
<b>Authority and Council</b>		
<b>Transport for NSW</b> (30/6/14)	Signalised crossing at intersection of Edward Street and Old Canterbury Road is to be minimum width of 3.6 metres (Austroad Standards) and includes a bicycle lantern on the north/south crossing points (Weston Street – Edward Street)	This is required to be delivered as part of Stage 3.
	Ensure sufficient space maintained to access the proposed cycleway between the light rail corridor and site. Access to the south will be from Edward Street (parallel to Old Canterbury Road) and from north through the development site along the proposed path developer providing from light rail stop to Smith Street.	A dedicated access is included as part of the Stage 1 project approval.
	Bicycle parking to be provided consistent with Austroads guidance, minimum for apartment buildings of one (1) secure space per 4 habitable rooms, and one (1) publicly accessible space per 16 habitable rooms.	Bicycle parking is provided in accordance with the Concept Plan Approval.
<b>Heritage Branch, Office of Environment &amp; Heritage</b> (30/06/14)	Key concern is to ensure that the new surrounding buildings do not visually over-dominate the Mungo Scott former Flour Mill buildings. Drawings show that the buildings have a reasonably sympathetic design in relationship to the Flour Mill, however the height	No adverse overshadowing of the Mungo Scott Building results from the modification. As demonstrated in the accompanying Solar Access Analysis.



Submission	Comments	Response
	increase may lead to increased overshadowing. Solar access impact on the Flour Mill should be considered in the assessment and whether alternative designs could minimise impacts.	
<b>Ashfield Council</b> (09/07/14)	<p>Concept plan modification has not adequately addressed DG requirement requiring detailed visual impact assessment to assess impact of increased building heights on existing low rise neighbouring areas of Summer Hill, particularly:</p> <ul style="list-style-type: none"> <li>Increased height of Buildings 5B, 3A and 3D nearer the boundary of Edward Street and impact on existing housing along Edward Street, Spencer Street and Carrington Street.</li> <li>Increased bulk and height of Building 1A and impact on predominantly 1 and 2 storey residential areas to the west in Summer Hill and impact on public vista along Smith Street.</li> </ul>	The visual impact of the modifications to the envelopes are minor, with the exception of Building 1A. The modifications to 1A now include an increased setback to Longport Street of 25.5m compared to the approved 21.0m setback. The envelope does not overshadow or dominate the low rise residential areas west of the Smith Street industrial lands.
	Number of affordable housing dwellings should remain at minimum 10 dwellings in perpetuity (as stated in Part 15 of Statement of Commitments).	Refer response in covering letter re Affordable Housing. The Statement of Commitments (Item 15) provided for ten (10) for a period of ten (10) years, not in perpetuity.
	Should be no increase in building bulk and height for Building 1A given likely adverse impact on nearby residential areas in Summer Hill, including those in Chapman Street and Fleet Street.	The application demonstrates no adverse impacts to the amenity of these dwellings.
	Should be no increase in building height for buildings 5B, 3A, 3C and 3D given likely adverse visual impacts for nearby residential areas in Summer Hill including Edward Street, Spencer Street and Carrington Street.	The envelope changes in these buildings are minor and result in no adverse amenity impacts.
	Additional 80 apartments will result in further traffic congestion to local streets during peak times and further parking impacts on Summer Hill village	The traffic modelling demonstrates that the traffic generation changes are minor.
	Concept plan documentation not adequately taken into account the Hawthorne Canal Flood Study and potential impacts on proposed ground floor levels, building heights and ground level entries to basement car parks.	Floor and stormwater impacts have been addressed in the Concept Approval and are not varied by the modification.
	Maximum FSR for entire site should be ascertained, and for each individual part of the site at Stages 1,2,3 and 4 by calculating the available GFA contained within the approved Building Envelopes in the 2012 Concept Plan approval.	The maximum approved GFA is not proposed to be amended.
	A coordinated transport study needs to be undertaken by State Government as public transport is already overcrowded and the road network is	This request is beyond the scope of the s75W Modification request.

Submission	Comments	Response
	beyond capacity at peak periods. Study should consider the local and regional impacts of the Summer Hill Flour Mill and Lewisham Estate developments as well as future development of the McGill Street Precinct.	
	Numerical increase in the number of apartments is supported, provided it is within the 2012 approved building envelopes. Opportunity for a greater housing mix and smaller affordable dwellings.	The primary modification to building envelopes is Building 1A. The impacts are addressed in the covering submission.
	No significant issues arise from the reduction in the maximum FSR for the retail component.	Comment noted.
	<b>Proposed reduction in amount of affordable dwellings</b>	
	The three (3) affordable rental housing dwellings constitute 1% of dwelling yield (2012 approval for 300 dwellings) – industry accepted standard is 3% (approximately 10 dwellings). Given upzoning of the site there should be a higher affordable housing yield requirement.	Refer response in covering letter re Affordable Housing.
	<b>Proposed changes in building bulk and height</b>	
	In relation to the increase in the building envelopes in bulk and height for Building 1A (Stage 4), justification given is that the increase is required in order to accommodate the maximum FSR of 1.6:1 applied to the site. Concept Plan approved maximum FSR range of 1.4:1 to 1.6:1 for the entire site, not a blanket max 1.6:1. Department provided flexible FSR because applicant not sufficiently detailed floor plans to show how FSR arrived at. Reason why Department capped maximum number of apartments for the whole site at 300 dwellings.	The allocation of Gross Floor Area is sought to be amended to align the approved GFA with dwelling yield and ensure existing urban infrastructure is most efficiently utilised.
	No detail on the Building 1A Gross Floor Area results (and FSR) and how many apartments are proposed within the larger building envelopes. Indicative floor plans should have been submitted with the modification.	It is anticipated Building 1A could accommodate 112 dwellings, as detailed in the architectural package prepared by Hassell.
	No detailed Visual Impact Assessment (i.e. SIMURBAN model). Such an analysis would mean the evaluation is carried out objectively and scientifically.	Detailed information has been provided to allow an assessment of the proposal.
	Department should stipulate a maximum FSR to apply for the site boundaries within Stage 4 within the Marrickville site, in order to provide certainty, and avoid any future request for variations seeking to clarify the approval conditions.	The overall dwelling and GFA caps as proposed to be modified will apply regardless of administration boundaries.



Submission	Comments	Response
	Council objects to any increase in building bulk and height for Building 1A given the adverse impacts for nearby residential areas in Summer Hill, including Chapman Street and Fleet Street.	Noted and refer to previous responses.
<b>Increase in Building Envelope Heights</b>		
	Increase in building height for Building 5B (6 storeys to 7 storeys) will have visual impacts for dwellings along Edward Street (from rear gardens). Increase in height within Stage 3 (Buildings 3A, 3C and 3D (rear of Building 5B)) will also have impact.	Refer response in covering letter re Height and Built Form.  Noted and refer to previous responses.
	Department should require the applicant to submit drawings which show how many apartments and GFA can be accommodated within the approved 2012 Building Envelopes for Stages 1,2 and 3 within the Ashfield LGA.	These are matters for subsequent development applications, which in any event will be required to comply with any caps on dwelling numbers imposed.
	Department should stipulate a maximum FSR to apply for the site boundaries within Stages 1, 2 & 3 of the site within Ashfield LGA to provide certainty and avoid any future request for variations.	The Concept Plan Approval as proposed to be modified achieves this outcome.
<b>Traffic Impacts</b>		
	Council's engineers advised that the modifications to the Concept Plan are not supported.	Comment noted.
	Modifications will further increase traffic, particularly during morning peak and will worsen existing poor operation, extensive delays and queues in surrounding road network.	The traffic modelling undertaken demonstrates this is not the outcome.
	NSW Government has not provided a commitment to program the removal of 'pinch point' at New Canterbury Road and Gordon Street which is the cause of the existing congestion.	Beyond the scope of the applicant to implement.
	Likelihood of further road network congestion from the proposed WestConnex project has not been adequately addressed.	Beyond the scope of the applicant to implement.
	Modifications will increase the likelihood of motorists using the local street networks to avoid existing congestion areas, such as Longport Street.	These factors were addressed in the extensive modelling undertaken for the Concept Plan Approval.
	Proponent has not provided any commitment to investigate, design, consult and implement changes to the existing traffic calming devices to accommodate cyclists.	An extensive package of upgrade works to the local area has been committed to as part of Stage 1.
	Modifications further increase likelihood of motorists parking their vehicles on the surrounding local streets and will reduce on-street car parking availability for residents.	On-site car parking will increase proportionally to any increase in dwellings provided.

Submission	Comments	Response
	Proponent has not provided any commitment to support Ashfield Council introducing a Resident Parking Scheme to address the potential situation caused by their development.	The introduction of a resident parking scheme is a matter for Council.
	<b>Stormwater and Flooding</b>	
	Noted that Council previously expressed concern about the freeboard of habitable floor levels and entries to basement car parks.	Comment noted.
	Exhibition of Hawthorne Canal Flood Study, Council's engineers noted that some parts of the development might have changes to the building design, resulting in increased ground floor levels and overall building heights.	The flooding impacts and management requirements were extensively addressed in the Concept Plan Approval.
	Relevant to the amendment application because of the availability of recent flood mapping data.	
	Modifications further increase the potential number of residents and business tenants impacted during a flood event.	Site flood management measures have been adopted for implementation.
	The proponent has not adopted the 100 year ARI design flood levels for the site in accordance with Councils flood study to address this situation.	
	Example drawings provided showing modification impacts.	The modifications do not alter the flood and stormwater management commitments.
<b>Marrickville Council</b> (13/06/14)	Concern that application fails to adequately address impacts of proposed modifications, particular modifications to Building 1A which will greatly increase the visual bulk and scale of the building.	Refer response in covering letter re Height and Built Form.
	Generally supportive of mixed use proposal and on balance application has considerable merit and responds well to existing condition and constraints of the site.	Support noted.
	<b>Bulk and Scale</b>	
	Bulk and scale of proposed modification to Building 1A. Not supportive of proposed amendments to Building 1A which will create an imposing, bulky form which will visually dominate the overall development and low density residential surrounds.	Refer to response in covering letter regarding Height and Built Form.
	<b>Apartment Numbers</b>	
	Impacts of increased residential dwellings within the development. Concern regarding 25% increase from Concept Plan Approval and significant increase in total dwelling numbers.	Refer response in covering letter re GFA, Building Envelopes and Dwelling Numbers.

Submission	Comments	Response																
	<p>Concerned that there will be a disproportionate increase in smaller apartments. The PPR included an indicative dwelling mix of:</p> <table><tr><td>1 bedroom (126-136 apartments)</td><td>45%</td></tr><tr><td>2 bedroom (100-128 apartments)</td><td>35-43%</td></tr><tr><td>3 bedroom (25-30 apartments)</td><td>8-10%</td></tr><tr><td>4 bedroom (11-24 terraces)</td><td>3-8%</td></tr></table> <p>Any approval of proposed modification should require that previously indicated dwelling mix be retained or a ratio consistent with Council's planning controls be conditioned.</p>	1 bedroom (126-136 apartments)	45%	2 bedroom (100-128 apartments)	35-43%	3 bedroom (25-30 apartments)	8-10%	4 bedroom (11-24 terraces)	3-8%	<p>Building 1A indicative mix is now:</p> <table><tr><td>· 1 bed</td><td>17%</td></tr><tr><td>· 2 bed</td><td>59.8%</td></tr><tr><td>· 3 bed</td><td>18.8%</td></tr><tr><td>· 4 bed</td><td>4.5%</td></tr></table>	· 1 bed	17%	· 2 bed	59.8%	· 3 bed	18.8%	· 4 bed	4.5%
1 bedroom (126-136 apartments)	45%																	
2 bedroom (100-128 apartments)	35-43%																	
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4 bedroom (11-24 terraces)	3-8%																	
· 1 bed	17%																	
· 2 bed	59.8%																	
· 3 bed	18.8%																	
· 4 bed	4.5%																	
	<p>Information accompanying the modification application is misleading, stating 'the modification does not seek to increase the maximum approved GFA but ensure that the approved building volume is efficiently utilised'. Modification seeks to redistribute and increase residential GFA from that in the approved envelopes in two (2) ways:</p> <ul style="list-style-type: none"><li>· Transferring 1000m<sup>2</sup> GFA from retail to residential</li><li>· Increasing building heights in Building 3B, additional levels to Building 3 &amp; 3A and 2A and additional levels and height in Building 1A, increased building height and additional level t Building 3D.</li></ul>	<p>The modification does not seek to increase the overall approved GFA cap of 40,000m<sup>2</sup>.</p>																
<b>Traffic and Parking</b>																		
	<p>Traffic implications of proposed amendments including two key traffic/transport issues; traffic generation and a reduction in provision of dedicated on-street parking spaces.</p>	<p>The traffic modelling has demonstrated traffic generation is acceptable. Any on-street parking provided is in addition to parking required to be provided within the development.</p>																
	<p>Council concurs that the proposed traffic generation rates under the modified application are acceptable. Although the proposed amendment increases traffic generation due to the increased residential component, this is balanced against traffic reduction from the reduced retail component. The net result is a modest increase in overall traffic generation, but this remains below the PPR approved rate.</p>	<p>Comment noted.</p>																
	<p>Proposal to reduce the Concept Plan Approval's 50 spaces for general parking to 35 spaces is supported provided this is necessary to provide for other higher priority uses (drop-off/pick up areas, loading/unloading areas and landscaped kerb blisters that may provide pedestrian crossings/connections to</p>	<p>Noted. Drop-off and loading zones as well as car-share spaces are provided on-street in Stage 1.</p>																

Submission	Comments	Response
	adjoining open space) whilst maximising the provision of general parking.	
	Council supports constrained approach to parking provision, but also the benefits of kerbside parking including provision of a physical barrier between pedestrians and moving vehicles and convenient, readily accessible form of parking for visitors. Council is not concerned with the proposed reduction in on-street parking provided the applicant can show that the modification will not reduce residential amenity or greatly impact on surrounding streets.	As noted, on-street parking is in addition to off-street parking required to be provided.
<b>Affordable Housing</b>		
	In relation to affordable housing, overall Council supports the amendment to dedicate the units rather than apply a ten year cap on rentals. Council requests that flexibility be provided within the consent condition so as not to restrict how Council may manage the units for affordable housing means.	Support noted.  Refer response in covering letter re Affordable Housing.
	Original commitment to provide ten dwellings as affordable rental accommodation for a period of ten years was made based on the established yield of max 300 dwellings. Considered appropriate that, should the proposed modification be approved, that the proposed dedication be revised commensurate to the proportion increase in residential dwelling yield/GFA.	Refer response in covering letter re Affordable Housing.
	A range of units is preferred (one and two bed are most needed) and the units should be mid-range (not the least valuable or the most). Units should be the same size and quality as the other units in the development. Units with low running costs are preferred (solar access and cross ventilation). Dishwashers, washing machines and dryers (if included in the development) are to be included in the dedicated units.	Refer response in covering letter re Affordable Housing.
	Flexibility should be provided within the consent conditions so that Council can use the units in the best way (this may mean sale or rental at market rate and use of any income or capital gain on another site in Marrickville LGA, rental at a capped rate for a period of time etc.).	Refer response in covering letter re Affordable Housing.
<b>Public Domain</b>		
	Proposed modification to the Terms of Approval for Schedule 4: Statement of Commitments relating to the Public Domain. Council is unclear why this modification is required as no reason provided. Considers that the original commitment should be	Refer response in covering letter re Public Domain and Statement of Commitments.

Submission	Comments	Response
	retained unless it can be shown that the changes will result in a better public domain outcome.	
<b>Public Submissions</b>		
<b>Name Withheld</b>	Opposes the planned changes. Site envelope is large and increasing the dwelling cap from 300 to 380 dwellings will place significant demands on the stretched local public infrastructure (already reaching capacity).	The traffic modelling identifies minor differences in traffic generation from the approved circumstance.
	Increase the height of three of the four proposed buildings will create larger towers and building capacity for more accommodation as well as inclusion of lift projection on silo buildings. Will detract from visual amenity of local area.	The visual analysis demonstrates that the alteration in built form is minor with no adverse amenity impacts arising.
	Reduction in on-street parking will impact on surrounding streets within Lewisham and Summer Hill areas. Street heavily reliant on street parking (no off street parking) and already under increasing pressure from parking near light rail station and three new apartment developments on Canterbury Road and Toothill Street.	The development provides required off-street parking. The on-street parking is an additional provision.
	Reducing affordable housing dedication is contravention to NSW Planning and Environment guidelines, also reduces our ability as a community to support housing affordability within major urban areas. Not socially responsible.	The proposal dedicates affordable housing to Council in perpetuity, rather than provides it for a time limited period.
	Proposal should be viewed in more holistic context of other developments within vicinity and rejected, increased development not able to be supported by community or urban infrastructure.	The proposal seeks to utilise the existing urban infrastructure as well as providing new open space and light rail access.
<b>Craig Sandwell</b>	Variations to Stage 3 from approved Concept Plan not mentioned in modification notice. Under Approval Building 5B is 4-6 storeys and in modification listed as 7 storeys.	Building 5B envelope does not change from the approved RL 35.2m. The approved Concept Plan identified the building as six (6) storeys. Within the approved envelope, this is now identified as a seven (7) storey building.
	Under Approval Building 5B located in line with boundary of the 6 Pack Silo, Building 5A yet in the amended plan it is now located outside this boundary to the North West.	The footprint of the building shifts to the north-west marginally closer to Building 5C, but not closer to adjoining properties.
	Increased dwellings (and associated vehicles) will create issues with on-street parking in Edward Street and greater traffic movements from the car park. Increased noise, light pollution.	Refer to previous responses regarding traffic.

Submission	Comments	Response
	Increased height of Building 3D will impact on current views, overlooking and sunlight (34 Edward Street), particularly morning summer sun.	Building 3D is south of 34 Edward Street. The solar access diagrams demonstrate negligible differences between approved and proposed overshadowing.
	Objects to increase in the number of residents.	The proposal demonstrates the capacity of increased dwellings to be accommodated.
	Reduction in off-street parking will increase the burden on parking on Edward Street. 50 places reduced to 80 extra residences can only increase this.	Off-street parking provision is to increase proportional to any increase in dwelling numbers.
	Visual impact on 34 Edward Street; currently have large sections of blue sky vision from yard and house, will be reduced by proposed changes.	The increase in height to Building 3C and 3D are minor. Building 3C remains at a maximum RL of 57.50m. Building 3D is approved at RL 39.35. This is proposed to increase by 550m to RL39.90 and a roof plant zone to RL42.90.
	All changes that increase capacity/levels overlook property and impact on privacy. Closest resident to the development; concerned about lack of vision, light, privacy and increased demand on parking in Edward Street.	Detailed design in future applications will still need to demonstrate privacy and amenity are achieved.
<b>Allan Alvis</b>	Increasing dwelling cap will have a detrimental effect on local traffic and off street parking (external to the scheme).	Refer to previous responses relating to traffic generation.
	Current approval car parking provision is less than that recommended in Ashfield LEP – R3 Medium Density.	Parking is provided in accordance with the Concept Approval.
	Reduction in on-street parking (within the scheme) will create additional pressure on external street parking	Off-street parking is provided. On-street parking provided is in addition to any parking required to be provided.
	Reduced retail floor will increase the car visitor trips to Summer Hill, Ashfield and other retail precinct.	The traffic modelling demonstrates that the reduced level of retail space reduces trip generation.
<b>Michael Zagdanski</b>	Opposed to the volume of change in the area. Currently two building sites close to property.	Refer to response in covering letter regarding Construction Impact of Development.
	Proposals have been upgraded after the original proposal was approved (increased height/accommodation). Seems to be a theme where a smaller/lower development is approved but swiftly increased.	Comment noted.

Submission	Comments	Response
	Affordable housing component was reduced.	Refer response in covering letter re Affordable Housing.
	Number of dwelling have been increased, parking reduced and adds strain on existing infrastructure in the surrounding area.	Off-street parking provision increases to accommodate any increase in dwelling numbers.
	Haven't seen any positive impacts on existing residents, huge windfall for local councils from ratepayers and stamp duty for State Government. Specifically green space including the Greenway corridor along the light rail.	Comment noted.
	Traffic and parking will be particularly impacted. Signs of increased traffic evident. Builders currently create rubbish and parking issues.	Refer to previous response to traffic matters.
	Request planners view the area holistically and consider overall impacts that a number of individual projects are having on residents.	Noted.
David Rollinson	Objects to modification. Key deficiencies in the rationale for the modification, the approval of the Concept Plan and its conditions.	Objection noted.
<b>Yield, Dwelling Size, Mix and GFA</b>		
	Submission provides calculations on GFA and number of apartments. Notes that the GFA for Stages 1-4 falls below maximum GFA allowed by Condition A5 (33,500m <sup>2</sup> ). The maximum residential GFA figure as originally proposed in the Concept Plan was far in excess of that required for the suggested number and mix of dwelling units.	Issue noted.
	Disconnect between yield and the maximum residential GFA. Failure to set a maximum which corresponded to the floor area of the yield/mix has opened the door for the modification application to request a significant increase in yield that could still fall below a maximum GFA.	Noted. The application does seek to respond to the maximum GFA approved by the Concept Plan.
<b>Building Envelope and Heights</b>		
	Modification states that there will be no increase in the maximum 40,000 sqm GFA but wishes to 'convert' 1,000sqm of the maximum retail GFA to residential. Retail areas are already contained within the concept plan building envelopes, conversion to residential would not alter those envelopes. An increase in the maximum number of apartments to 380 does not require an increase in the total GFA (according to proponent) so variations to building envelopes and heights from that approved are not necessary.	The modification to approved envelopes is sought to accommodate a GFA closer to the overall cap of 40,000m <sup>2</sup> GFA.

Submission	Comments	Response
	Fact that additional floors (which obviously contain more GFA) and increases in height are now proposed shows that the building envelopes proposed and approved as the Concept Plan were incorrect, and a considerable under depiction of what was truly necessary for a total GFA of 40,000sqm.	Detailed design development has occurred since the initial concepts for the Concept Approval. The Modification seeks to align the Concept Approval with the design development.
	Proposal for Building 1A is of major concern. Combined with the form and mass of envelopes approved under the Concept Plan for Lewisham Estate (directly east) a canyon of buildings will overshadow and dominate the light rail, residential footpaths and the Greenway walking and cycling path.	The proposal has been modified to increase the setback from Longport Street by a further 4.5m and detailed design principles for Building 1A prepared which will be included in the Statement of Commitments.
	Modification should be rejected. Having a maximum GFA as a condition of a concept approval does not create an entitlement to achieve that maximum. Concept Plans are essentially to establish building envelopes (within which detailed design can proceed) not to establish a 'bank' of GFA from which to draw.	Comment noted.
	The 40,000m <sup>2</sup> total GFA consistently stated by the proponent (which is the summation of residential, retail, commercial GFAs) was well beyond what the approved Concept Plan building envelopes could contain. The validity of the PAC approval of the Concept Plan is in question, as the GFA sought was far in excess of what the approved building envelopes could contain.	Comment noted.
	If the EA and PPP documentation and the architect's concept plans as approved are correct, the modifications that propose additional floors and increased height are unnecessary, as the approved building envelopes already provide for the floor area required. Extra floors be they by attic conversions, floor to ceiling adjustments to squeeze in a floor or adding storeys which change building envelopes, must increase overall GFA.	Comment noted.
Kirsten Ludlow	Concern over the increased level of peak hour car traffic from the development and other new developments in the vicinity.	Refer to previous response regarding traffic.
	Traffic reports only talk about raw number of vehicles per hour, current and projected which is purely objective. Don't address whether the current level of peak hour road traffic is problematic (believe it is) and extent that an increase from new development will exacerbate the problem (believe it will).	The traffic modelling specifically addresses level of service performance.
	Number of chokepoints currently (including roundabout at Carlton Crescent and intersection of Old Canterbury Road and Carlton Crescent) and	Comment noted.



Submission	Comments	Response
	these will only get worse as more vehicles use road.	
	Need more meaningful (subjective) assessment of traffic impact and proposed solution.	Refer to previous comments regarding traffic assessment.
<b>Name Withheld</b>	Two previous submissions have not been recorded. This is a breach of law. Cannot be selective to what submission published.	This is an issue for the Department of Planning & Environment. The Applicant in this summary table and covering letter has addressed all submissions provided by the Department to the Proponent.
<b>Name Withheld</b>	Objects to increase dwelling cap from 300 to 380 dwellings. Structure is already too large for the area, there is already another development on the Marrickville side.	The application has demonstrated the capacity of the locality to accommodate the proposal.
	Not enough infrastructure to support already large development.	The proposal includes open space and access to the light rail and seeks to efficiently use existing urban infrastructure.
	Lives on Wellesley Street, traffic getting worse on Old Canterbury Road and also Smith Street leading to roundabout near train line. Traffic bottlenecks in morning around roundabout. Cars take shortcuts through surrounding streets. Same will happen with proposed traffic circle on Edward and Smith Street (traffic will be forced onto Wellesley Street and surrounds).	Traffic infrastructure upgrades are included in the approval requirements.
	No assessment of the impact of traffic from the development towards Wellesley Street. Traffic to Old Canterbury Road or Smith Street will be channelled down Wellesley Street (for example when flour mill was operating trucks were blocked from taking shortcuts through Wellesley Street).	Traffic modelling based upon the previous peer reviewed modelling was undertaken.
	Objects to proposed new traffic circle on Edward and Smith Street; it should be removed.	The roundabout is required to be provided as part of Stage 1.
	Objects to the proposal to increase the dwelling cap from 300 to 380 dwellings.	Comment noted.
	Proposes that the intersection of Wellesley Street and Edward Street be closed off, so that traffic is not diverted through Wellesley Street; and in addition prevent the traffic from the development feeding into Wellesley Street.	Previous modelling has not identified this outcome as being required or necessary.
	Traffic calming methods should be extended in Summer Hill, adjacent to the Mill development, to reduce the additional through traffic from the development	A range of measures, including traffic lights are to be provided under the terms of the existing approval.

Submission	Comments	Response
	Resident only parking should be put in place in the surrounding area of the development.	Noted. This is a matter for Ashfield Council.
	Tramline access from Summer Hill side of "Lewisham West" tram stop should be finalised and temporary access should be completed before construction starts.	Access will be provided as part of Stage 1 works.
Mary Osborn	Local community have not been provided the opportunity of an open consultation in which they can hear reasons for this modification and an opportunity to express opinions.	This is an issue for the Department of Planning & Environment. The Applicant in this summary table and covering letter has addressed all submissions provided by the Department.
	Community living in Fred Street and immediate surrounds have had first-hand experience of reduced enjoyment of living. Disruption brought about by two relatively small development projects (new residential buildings). Both projects resulted in large amounts of litter and cars parked by construction workers being parked dangerously.	Comment noted.
	Access to Summer Hill Street off Old Canterbury Road has been restricted due to large vehicles parking across the street during construction works. Construction workers were placed on the street with 'stop' signs but failed to produce 'traffic controllers licences' and were discourteous when approached.	Comment noted.
	Increase in the building envelopes and dwelling caps raise planning and public health concerns including:	Comment noted (refer below).
	Air quality: increased number of houses proposed by the modification will increase the number of cars and corresponding increase in pollutants from car exhausts.	The development has been prepared on the principle of encouraging public transport use and minimising the reliance on private vehicle use.
	Physical activity: the plans do not support a built environment that is likely to promote physical activity. Features of the design proposed will not encourage residents to enjoy exercising. Design characteristics influence motivation to exercise (width of tree canopies, placement of sidewalks and vistas from the park create a sense of place). Factors that can be disincentive to exercise include land density and presence and quality of footpaths. Areas that have been described as high walkability and promote walking have specific venues (such as parks) and where the design of the streets includes trees and cars are limited.	The development is in a location with good public transport links. The site provides open space and linkages to pedestrian and cycle paths. These attributes encourage transport by means other than private vehicle and walking and cycling are viable alternatives due to the location in easily walkable catchments.
	Increased number of residential units but no increase in the total bicycle parking space or proposed cycle lanes.	Parking and bicycle parking increases proportionally to dwelling number increases.

Submission	Comments	Response
	<p>Currently quality of neighbouring roads surrounding the modified development is poor.</p> <p>Option for the modification to support physical activity as an attractive option if they choose to support the use of walking and cycling paths along the light rail corridor that is the proposed GreenWay which local communities want alongside the light rail extension to Dulwich Hill.</p>	<p>The proposal includes upgrades to the surrounding pedestrian facilities, as well as connections to the light rail corridor through the site.</p>
	<p>Objects to impact of noise from local traffic and there is no provision for noise abatement for the planned units. Growing evidence that maximum noise levels from noisy vehicles in a traffic stream (load trucks, buses, cars and motorcycles) are key factors in determining annoyance.</p>	<p>Road and rail noise impacts were considerations addressed at Concept Plan stage, and are matters required to be addressed in future development applications.</p>
	<p>There is no mention in the modification to the nearby rail corridor and the impact on noise on the residential apartments and the impact on sleep.</p>	<p>See above.</p>
	<p>Reduction in on-street car parking will impact on already congested transport route.</p>	<p>Off-street car parking is provided. The on-street parking is an additional provision.</p>
	<p>Traffic report uses the measurement frequency of trips that the proposed residential units will generate based on RMS trip rate of 0.29 trips per unit. This is misleading as frequency of trips influenced by socioeconomic status and should be determined by length of trip. Lewisham attracts people of high socioeconomic status, people have cars and are more likely to use cars than walk.</p>	<p>The traffic methodology used is consistent with the Concept Plan modelling which was subject to extensive review.</p>
	<p>Transport plan did not mention impact from four schools, parents dropping off children and senior students using local streets to park cars. Also Lewisham station commuters park in the local area.</p>	<p>The assessment has considered trip generation, modal split and parking options relative to the existing network performance.</p>
	<p>Discusses in detail the issue of affordable housing and objects to changes in the affordable housing dedication.</p>	<p>Refer response in covering letter re Affordable Housing.</p>
<b>Robert Grace</b>	<p>Concern over proposed scale of the development. Associated increase in population will place undue strain on associated infrastructure – creating traffic bottle necks, congestion and overcrowding.</p>	<p>Refer to previous traffic responses.</p>
	<p>Lack of public green space and public amenity factored into the development is trivial. For an inner city urban suburb the opportunity to create broad public greenspace and general amenity must not be lost.</p>	<p>A substantial amount of open space and accessible open space is provided.</p>

Submission	Comments	Response
	Aesthetic of proposed development is disastrous, proposal dwarfs the generally low level development of the neighbourhood and with Lewisham towers will create an eyesore of visual pollution on the urban landscape. Scale of development is out of keeping with the village feel of Summer Hill.	Comment noted.
	Overall height and scale should be reduced to lessen the visual impact.	Comment noted.
	The number of units should be reduced to minimise the stress on the immediate public infrastructure such as roads.	Comment noted.
	There should be increased emphasis on green space and public amenity.	Significant public open space is to be dedicated as a result of the proposal.
	There should be greater provision for off-street parking.	Off-street parking is provided in accordance with the Concept Approval.
	Greater attention to the otherwise small scale development in the area so it is a closer match.	The interface with Edward Street is low-rise of two storey plus attic rooms, providing an appropriate transition.
<b>Name Withheld</b>	Structure is already too large for the area.	Comment noted.
	Traffic getting worse on Old Canterbury road and also Smith Street leading into the roundabout near the train line. Morning traffic bottle necks each morning at Carlton Crescent and Convenor Crescent resulting in cars taking shortcuts through the suburb.	Refer to previous traffic comments.
	New street and intersection from the development at Wellesley Street and Edward Street and no assessment of impact of traffic from development towards Wellesley Street.	The intersection was approved and assessed as part of the Concept Plan and Project Approval for Stage 1.
	Proposes that the intersection of Wellesley Street and Edward Street be closed off, so that traffic not diverted through Wellesley Street or section of Wellesley Street (between Spencer and Edward Street) is made one way (east/west) so that traffic will not divert through Wellesley Street.	Decisions on closure of existing roads are matters for Ashfield Council.
	Traffic calming should be extended in Summer Hill (adjacent to Mill development) to reduce the additional through traffic from the development.	Traffic management improvements required by the development have been conditioned as part of the Concept Approval.
	Resident only parking should be put in place in the surrounding area of the development.	Decisions on the implementation of residential parking schemes are a matter for Ashfield Council.



Submission	Comments	Response
	The tramline access from Summer Hill side to the "Lewisham West" tram stop should be finalised and temporary access should be completed before construction starts.	The access will be provided as part of the Stage 1 works.
Name Withheld	Strongly urge decision makers not to allow this amendment.	Noted.
	Concentration of residents already very high and amendment would add to infrastructure and services pressures on the community.	Noted.
Alan Pattison	New proposal is too dense and too congested.	The height, bulk and scale is substantially consistent with the approved Concept Plan.
	Insufficient parking provided which will lead to surrounding streets being 'parked out'. Existing local residents have difficulty finding spots to park their own cars.	Off-street parking is to be provided as required by the Concept Plan Approval.
	Prefer the new plan for the silos as new balconies look more attractive.	Noted.
	Object to scope of project and site becoming too crowded and insufficient open spaces. Proposed population increase, together with surrounding development proposals, will lead to massive congestion.	The quantum of open space to be provided has not changed from the approval.
Grahame Devrell	Against the proposed modification.	Comment noted.
	Too many developers put a proposal which will include a level of public housing to be included with original proposal, but this is deliberately used to obtain approval and then modified.	Affordable housing is not being removed but provided in a manner without time limitation.
	Increase the number of dwellings by 80, this is a 25% increase from original application. Overdevelopment of the site for a pure profit motive.	Comment noted.
	Modification should be refused on grounds of increased traffic in narrow streets which are not suitable.	The traffic modelling demonstrates the capacity to accommodate the traffic generated.
Name Withheld	Object to proposed increase to building envelopes in Stages 3 and 4 and the proposal to increase the dwelling cap from 300 to 380 dwellings.	Comment noted.
	Object to proposal to reduce retail floor area and increase residential floor area.	Comment noted.
	Insufficient infrastructure to support this already large development. Traffic getting worse on Old Canterbury Road and Smith Street leading into the roundabout. Intersection of Wellesley Street and Edward Street	Refer to previous responses to traffic generation.

Submission	Comments	Response
	should be closed off so that traffic will not divert through Wellesley Street. Traffic will substantially increase as a result of the development and there needs to be traffic calming in the surrounding streets.	
Name Withheld	Noted proposal includes roundabout on Smith Street and Edward Street junction. Major traffic flow problem in morning is travelling east on Smith Street. Roundabout will give priority to traffic flowing out of development in Edward Street. Huge disadvantage to existing traffic in Smith Street that is coming from the west.	The roundabout was approved as part of Stage 1 and overall traffic management requirements.
	Telling us that the new plan will reduce the hourly volume by 10 vehicles per hour steps around the issue that an extra 196 vehicles per hour will be a serious problem on its own.	The traffic modelling is comparing the approved traffic generation against the revised generation arising from the requested modification.
Name Withheld	Major concern about magnitude of development and effect on traffic and parking in the area.	The traffic generation on a cumulative basis was assessed in the approval of the Concept Plan.
	Currently the roundabout on Grosvenor Crescent is a major bottleneck at peak hour (morning and evening). Queuing from Dover Street into Grosvenor Crescent before get past the roundabout.	Comment noted.
	Summer Hill shopping village has a major parking problem in the whole area for most of the day, particularly car park next to IGA supermarket.	Comment noted.

## Attachment 3: Revised Statement of Commitments

### Schedule 4 Statement of Commitments modifications

Existing Commitment	Revised Commitment
<p><b>5 Public domain</b></p> <p>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.</p>	<p>No changes to commitment.</p> <p>Amend timing.</p> <p>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.</p>
<p><b>15 Affordable rental housing</b></p> <p>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.</p> <p>Timing – To be provided in stages 2, 3 or 4.</p>	<p><b>15 Affordable rental housing</b></p> <p>The dedication to Marrickville Council of four (4) dwellings comprising 2 x 1 bedroom and 2 x 2 bedroom dwellings to be owned and managed by or on behalf of Marrickville Council.</p> <p>Timing – To be provided in stage 4.</p>
<p><b>16 Design Guidelines Building 1A</b></p> <p>New commitment</p>	<p><b>Urban Design and Architectural Design Guidelines for Building 1A</b></p> <p><b>Building Form</b></p> <p>The building mass is configured in two parts, as a base and top, to relate to important heritage building, the Mungo Scott building. The base has been set to relate to the parapet height of the Mungo Scott building, while the element above relates to the upper stratum of the wider Summer Hill Flour Mill site, characterised by industrial forms and materials, typically resolved in light colours.</p> <p>As a direct response, the detailed design for Building 1A will adopt a more solid base to relate to the scale of the Mungo Scott building, and will adopt a lighter, reflective quality to the upper element.</p> <p>The centrally located circulation core proposed in Building 1A will be configured to bring a strong vertical emphasis to the building expression, and is intended to provide natural light and ventilation to the common circulation areas as well as signalling the building entry.</p>

## Schedule 4 Statement of Commitments modifications

### Building Materials

To respond to the immediate site context, the base of Building 1A will utilise a deep red-coloured brick as the predominant building material in order to relate strongly to the Mungo Scott building. The new Building 1A base may also incorporate secondary architectural elements of painted render, consistent with the Mungo Scott building's parapet.

The upper portion of Building 1A will adopt a material quality consistent with other industrial elements across the Summer Hill Flour Mill site. The new building will utilise framed elements, generally in lighter colours and occasionally using reflective metallic elements and screens.

### Architectural Detail

The Building 1A base will use brick as the predominant building material adopting a sense of depth and solidity consistent with the treatment of the Mungo Scott building. The secondary scaling elements within the base will strike an overall vertical emphasis within the otherwise strongly horizontal brick base.

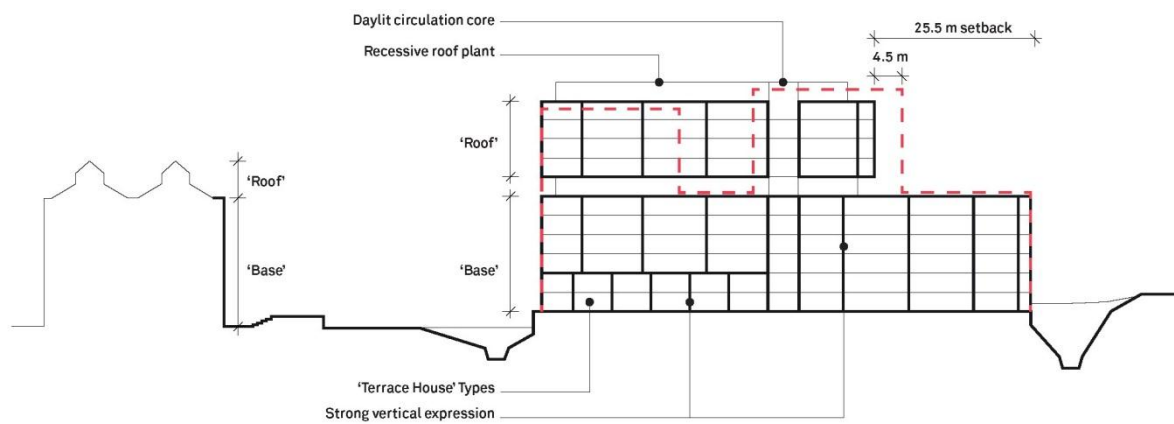
The Building 1A top will use lighter coloured architectural elements and will adopt a framed expression. The secondary scaling elements will balance both the vertical and horizontal to maintain the intention for the building top to reflect the framed, metallic and light coloured quality of the adjacent industrial site. The top of Building 1A will also incorporate a language of screens to provide shade and shelter.

Refer to diagram below

### Design Excellence

In order to achieve project continuity and maintain design excellence, the Development Application for Building 1A will be designed by the author of the approved Concept Plan. The incumbent design practice – HASSELL – has been recognised for design quality over many years of sustained output. In addition, the DA will be subject to the established design review processes at Marrickville Council and be reviewed by their Architectural Excellence Panel through the assessment stage.





Revision	Date	Scale	Client	Project Name
Revised Submission	28 August 2014	Not to scale	EG Funds Management	Summer Hill Flour Mill