

INTRODUCTION

This submission evaluates an Environmental Assessment (EA) Report, prepared on behalf of Lewisham Estates Pty Ltd, to accompany a concept plan application under Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act) for a mixed use development including residential, retail and commercial land uses and public domain improvements at 78-90 Old Canterbury Road, Lewisham. The concept plan and associated EA Report are on public exhibition between 17 November 2010 and 7 January 2011.

The concept plan proposes a mixed use development including residential, retail and commercial land uses and public domain improvements on the site, containing 7 building envelopes with buildings ranging in height from 4 to 9 storeys and a overall floor space ratio (FSR) of 3.5:1.

This submission considers:

- The consistency of the proposed development with the McGill Street Masterplan as adopted by Council;
- The relationship between the proposed development and policy directions for the McGill Street Precinct contained within existing strategic planning documents; including the Marrickville Urban Strategy (MUS), Marrickville Employment Lands Study (MELS) and the draft South Subregional Strategy (dSSS);
- The economic impacts of the proposed development, including impacts on surrounding retail and commercial areas;
- Environmental issues relating to the proposed development; including flooding and open space provision;
- The relationship of the proposed development to the proposed Inner West light rail extension and GreenWay corridor;
- Social issues such as the provision of affordable housing, infrastructure provision and Section 94 contributions; and
- Accessibility and traffic issues, including the provision of pedestrian access, traffic generation of the proposed development and parking requirements.

BACKGROUND

The subject land forms part of a light industrial precinct identified in the draft South Subregional Strategy (dSSS) as land that could be investigated for alternative uses, including non-employment purposes such as residential, new open space and civic space. A mixed use zone to ensure the retention of some employment activities is recommended in the dSSS.

The Marrickville Urban Strategy (MUS) identified the precinct as an industrial precinct appropriate for urban renewal and recommended that the area be rezoned to; cater for residential housing demand, address local amenity and provide space for community facilities. The Marrickville Employment Lands Study (MELS) in turn recommended that the precinct should be rezoned to permit a mix of residential development and a broad range of low impact employment uses.

Council at its meeting on 16 June 2009 considered a Notice of Motion in response to the initial Lewisham Estate proposal and resolved as follows:

THAT Marrickville Council opposes the proposed development at Longport Street and Old Canterbury Road, Lewisham. The development:

- a) is a gross overdevelopment of the site;*
- b) threatens the viability of local shopping strips and small businesses; and*

c) is totally out of scale with the surrounding community and environment.

It is therefore essential that any proposed development on this site be part of a plan for the whole precinct; and that

- 1. Council initiate the preparation of a masterplan for the area known as the 'McGill Street Precinct' which comprises the industrially zoned land bounded by Old Canterbury Road, Longport Street and the Rozelle Goods line;*
- 2. the masterplan for the McGill Street Precinct address the following key principles:*
 - consistency of development with the centre's hierarchy and any out of centre retailing impacts;*
 - the orderly planning and development of the precinct;*
 - timing and equity of development for all land owners within the precinct;*
 - the management of future traffic and access within and surrounding the precinct;*
 - the scale and density of development;*
 - landscaping and public domain treatments;*
 - public open space, linkages and provision for the greenway corridor; and*
 - the suitability of the precinct for commuter car parking;*
- 3. appropriate zoning, height limits, floor space ratio and other development controls be placed on the McGill Street precinct to ensure urban renewal of the area that is complementary to the surrounding community and in accordance with the Marrickville Urban Strategy;*
- 4. the General Manager investigates funding for the masterplan and reports back to Council;*
- 5. this planning be conducted as a matter of urgency to ensure Marrickville Council's vision for the McGill Street precinct is comprehensive and clear, and that any changes can be implemented during the current review of the Marrickville Local Environment Plan; and*
- 6. representations be made to the Minister for Planning seeking amendments to the Director General's requirements for the Part 3A Project issued in March 2009, which require that the development proposal for the subject site is consistent with a Council endorsed masterplan.*

Council on 30 June 2009 wrote to the Minister for Planning advising of the resolution and requested that the DGRs be amended once the Council's masterplan for the McGill Street Precinct was adopted.

In July 2009 Hassell Limited was engaged by Council to prepare a masterplan for the McGill Street Precinct. Consistent with the MUS and dSSS, the study brief identified the site as being most suited to predominantly high density residential use with some live/work flexibility, **minor supporting retail** and community service uses. Open space, particularly where associated with higher scaled residential development was also identified as a necessary part of any redevelopment.

A draft masterplan was subsequently prepared and a Councillor briefing, community open day and a landowner briefing were each conducted in September 2009. Feedback from these processes was used to refine the masterplan and identify planning controls for the precinct suitable for incorporation in a draft LEP.

Council officers on 3 September 2009 met with officers from the Major Projects Assessment Team of the Department of Planning which is responsible for assessing the Part 3A proposal for 78-90 New Canterbury Road. This meeting assisted in identifying the key issues surrounding the Part 3A proposal and Council's masterplan, particularly with regard to timing and related processes.

On 10 November 2009 Council adopted the McGill Street Precinct Masterplan. In doing so Council also resolved to forward the McGill Street Precinct Masterplan to the Minister for Planning and the Director General of Planning requesting the DGRs be amended to require that the development proposal be consistent with the masterplan. Council further resolved to prepare a draft LEP for the precinct, and forward a planning proposal (in the form of the masterplan) to the DoP for Gateway Determination, to enable the rezoning of the precinct consistent with the masterplan.

On 9 March 2010, Council resolved to amend the draft Marrickville LEP 2010 (dMLEP 2010) to incorporate the planning controls contained in the McGill Street Precinct Masterplan. Following discussion with the DoP confirming the new zones etc could be incorporated into dMLEP 2010, the relevant information and maps were forwarded to the Department on 18 March 2010.

In August 2010 Council received a planning proposal for a mixed use development at the adjacent site at 2 Smith Street, Summer Hill (Allied Mills). Council at its meeting on 17 August 2010 resolved that:

- *Council writes to the Department of Planning, Minister for Planning and local members for Marrickville, Canterbury and Strathfield, requesting an extension of time from 30 to 60 days for public submissions to the Part 3A application for the Lewisham Towers; and*
- *as soon as any development proposal for either the Allied Mills site or the Lewisham Estate site is lodged, Marrickville Council will commission a traffic study (and seek to do this in conjunction with Ashfield Council) for the entire precinct of Lewisham and East Summer Hill to model the effect of both the Lewisham Towers development, the Allied Mills development, and potential development on the remainder of the McGill Street precinct.*

On 15 November 2010 Council received further correspondence from the DoP advising that Lewisham Estates Pty Ltd had lodged the concept plan and that the application would be placed on public exhibition from Wednesday 17 November 2010 to Friday 7 January 2011.

At its meeting on 16 November 2010 Council resolved to:

1. *Seek expressions of interest from relevant urban design professionals, to undertake an independent review of the urban design aspects of the Lewisham Estate proposal;*
2. *Write to the Minister for Planning and the Local Member Carmel Tebbutt seeking that the terms of reference for the PAC include that it provide for open public representations, and we request that the proposal be referred to the NSW Government Architect for an independent assessment; and*
3. *Request the Minister to consider the proposal in conjunction with Allied Mills so the combined impacts can be assessed and request that the Minister require the RTA to conduct an independent traffic study.*

Zoning provisions

Marrickville Local Environmental Plan 2001 (MLEP 2001)

Under the zoning provisions of MLEP 2001 part of the north-east corner of the site is zoned Reservation – Arterial Road and Arterial Road Widening (9C). The remainder of the site is zoned Light Industrial (4B). The proposed mixed use development does not constitute a permissible use under the zoning provisions applying to the land under the MLEP 2001.

Draft Marrickville Local Environmental Plan 2010 (dMLEP 2010)

Under dMLEP 2010 the site is affected by a number of proposed zones, which are based on the land uses in the adopted McGill Street Precinct Masterplan. These zones include High Density Residential (R4), Mixed Use (B4), Business Development (B5), and Light Industrial (IN2). The majority of the proposed retail uses, including the proposed supermarket, is located within areas

zoned High Density Residential and Light Industrial under the dMLEP 2010 and as such are prohibited under the provisions of these zones.

Land Use Issues

As part of the development of dMLEP 2010, Council considered a range of existing strategic planning studies relating to the subject site. These studies included the overarching directions contained within the Sydney Metropolitan Strategy, the dSSS, MUS and the MELS. All of the studies that apply to the subject site support a change in future land use within the McGill Street precinct and are summaries below:

- The dSSS notes *that the proximity of the site to Lewisham Station (in addition to other factors identified in the strategy) suggest it is suitable for change to Category 3, and a mixed use zoning, ensuring the retention of some employment activities.* (p. 36, dSSS)
- The MUS identifies the precinct as an industrial precinct appropriate for urban renewal and recommends that the site be rezoned...*to cater for residential housing demand, address local amenity and provide space for community facilities.* (p. 18, MUS)
- The MELS states that the *Precinct should be rezoned to permit a mix of residential development and a broad range of low impact employment uses.* (p. 75, MELS)

Council responded to the largely consistent policy directions contained within these studies to commission the McGill Street masterplan for the precinct. Council's brief for the project made the following comments concerning the opportunities and constraints within the precinct:

While the MUS and the dSSS have designated the site to be developed for mixed use, it is considered the site is most suitable for predominantly high density residential use with some live/work flexibility and minor supporting retail and community service use. Open space, especially when associated with higher scale residential, also needs to be provided as part of the redevelopment, including the considerable advantage of outlook onto the probable future 'green corridor'.

Given that the precinct is large, available for complete redevelopment and is isolated from the surrounding neighbourhoods; that there is a context of larger scale buildings within the adjoining Allied Mills; that there is minimal aircraft constraints to adjoining dwellings, there is high potential for the precinct to include high buildings and overall higher density than typical in the Marrickville LGA.

Council adopted the McGill Street precinct masterplan on 10 November 2009. In March 2010 Council resolved to amend dMLEP 2010 to incorporate planning controls contained within the adopted masterplan. Accordingly, the broader policy framework supports a change within the precinct and Council has finalised the planning for the precinct through the inclusion of appropriate land use provision in dMLEP 2010. The Department's endorsement of dMLEP 2010 for public exhibition is considered to be an endorsement of the proposed planning provisions for the precinct.

Council refutes the applicants claim that the concept plan is generally consistent with Council's adopted McGill Street masterplan. Council considers the concept plan to be largely inconsistent with Council's adopted masterplan, particularly in terms of proposed scale and density of development, and the provision of open space within the subject site. Council requests that the concept plan be amended to be consistent with council's masterplan for the precinct, which has in principal endorsement from the Department through approval of dMLEP 2010 for public exhibition.

Orderly and Equitable Development

Council's masterplan sought to address ownership constraints and opportunities for the entire McGill Street precinct in terms of creating realisable development parcels, rational consolidation patterns with an effective street network, phasing out existing industrial uses and mitigating existing conflicts between competing land uses. To achieve this objective, the masterplan covers the entire McGill Street precinct. However, the subject application covers only part of the McGill Street precinct.

It is considered that considering the subject site in isolation is likely to constrain the development capacity and options for other properties within the precinct and lead to lower quality planning outcomes. Furthermore, assessing the subject site in isolation fails to assess the cumulative impact of future development within the McGill Street Precinct. For example, the concept plan for the subject site proposes to provide more than three times the amount of retail floor space than was anticipated for the entire McGill Street Precinct under Council's masterplan. In addition, the concept plan proposes to provide up to 400 residences whereas Council's masterplan anticipated approximately 500 for the entire precinct.

Gross Floor Area

The table below compares the gross floor area (GFA) distribution of Council's McGill Street Precinct Masterplan with the proposed Lewisham Estates concept plan:

Table 1: Comparison of Council and Concept Plan masterplans

Council's McGill St Master Plan*			Concept Plan		
Land Use	Residential	- 20,344m ²	Residential	-	39,646m ²
	Retail	- 636m ²	Retail	-	6306m ²
	Commercial	- 1,257m ²	Supermarket	-	2800m ²
	Total GFA	= 22,237m ²	Commercial	-	287m ²
			Total GFA	=	45,902m ²

* Figures relate 'Site 1' of the McGill Street Precinct Masterplan (the area subject to the concept plan).

It is evident from the above table that the concept plan features significantly higher GFA yields than those proposed by Council. Page 45 of the concept plan provides the following explanation as the main cause for higher GFA yields:

Floor Space Ratio – An increase in floor space ratio was brought about because of the refined green boulevard that forms Hudson Street. Council's McGill Street Precinct Masterplan places the entire public open space area within the subject site whereas by comparison, the Tony Owen Partners Masterplan proposes a more equitable distribution of open space along Hudson Street. Whereas the Council Masterplan nominated all public open space to be provided on the concept plan site, under the Tony Owen partners Masterplan the subject site and existing properties located to the south of Hudson Street would each have responsibility for dedicating some land into public ownership.

Furthermore, it is noted that the applicant has failed to highlight that the Tony Owen Associates Masterplan includes a large amount of below ground retail space, which significantly increases the scheme's overall GFA.

The concept plan goes on to point out that the methods for calculating GFA between the two Master Plans were incongruent and provides a recalculated total GFA for Site 1 of the McGill Street Masterplan of "26,988m²" (still significantly less than the concept plan's 45,902m²). The concept plan also makes the assertion that the building envelopes of the two schemes are similar and therefore the question of GFA is of minor relevance.

Open Space

The need for an equitable solution to the allocation of open space is an issue that is recognised by Council. Nonetheless, it is noted that the proposal to relocate the open space further to the south is not an equitable solution and will significantly reduce the likelihood that the provision of this open space will be realised without significant changes to the anticipated built form of future development sites within the precinct. Although the concept plan deals with the subject site only, it is noted that detailed plans have also been prepared for the remainder of the precinct. The majority of the open space shown in the concept plan falls outside of the subject site, and therefore does

not form part of the application. Council raises concerns regarding the location of the proposed open space. Its failure to be included as part of the subject application raises serious concerns about the likelihood of its development. Council refutes the claim in the application that the open space proposed in the concept plan is larger in area in comparison to Council's masterplan. The concept plan covers only part of the McGill Street precinct and it is disingenuous of the applicant to argue that it includes more open space than Council's masterplan, as the majority of the open space referred to falls outside of the subject site.

Given the above, it is considered that the subject application would lead to gross overdevelopment of the McGill Street Precinct (should the yields on the balance of the precinct be maintained) with consequent repercussions on matters such as traffic generation (especially given the amount of proposed retail) and the cumulative effect of surrounding developments, such as the adjacent Allied Mills site. It is also noted that the proponents for the Allied Mills site have indicated that they also intend on including significant retail floorspace in their proposal.

To ensure equitable and appropriate revitalisation of the McGill Street Precinct it is essential that the site be dealt with holistically. The subject application fails to achieve this through dealing with a portion of the site only. Council submits that the subject application should be amended to be consistent with Council's adopted masterplan which sets future direction for the entire McGill Street precinct to ensure good planning outcomes.

Further, Council requests that, to ensure the cumulative impacts of developments within the precinct are considered concurrently, the adjacent proposal for the Allied Mills site (2-32 Smith Street, Summer Hill) be considered by the same Planning Assessment Commission, preferably with the same chair and members, as it considering this subject application.

Centres Hierarchy and Out of Centres Retailing

The dSSS and MUS both identify Lewisham as a neighbourhood centre. There is no strategic direction in either strategy that contemplates Lewisham or the McGill Street Precinct adopting a higher order centre role.

As noted above, Council has undertaken urban design work for its centres to inform the planning controls for the dMLEP 2010 and comprehensive DCP. The work for the Lewisham Centre has been undertaken based on its agreed role as a neighbourhood centre. This has informed the scale of development and range of permissible land uses. The introduction of the quantum of retail floor space proposed on the subject site and the scale of the residential development requires detailed evaluation in terms of its impact on the role and viability of the Lewisham neighbourhood centre. Moreover, due to the proposed scale of the retail floorspace, consideration of the impact on the role and function of other centres such as Petersham, Dulwich Hill, Marrickville Road, Summer Hill, Ashfield and Leichhardt needs to be undertaken. It is also noted that the proponents for the Summer Hill Flour Mills site have indicated that they also intend on including the provision of significant retail floor space in their proposal.

The economic impact assessment concludes that the retail facilities proposed under the subject concept plan will not have a significant impact on other retail facilities within the region. This conclusion is formed largely on the notion that the existing supermarkets in the area are experiencing 'overtrading' due to a shortage of retail floor space in the area. The economic impact assessment makes the following assertions with regard to the impacts of the retail component of the proposed concept plan:

- *A contributor to local retail expenditure will be the residences developed on the site and eventually on adjoining sites (i.e. – the immediate neighbourhood). Not only will these households contribute to on site retail facilities they will also provide additional support to retail services in other centres.*
- *We expect that existing (and potential) households within the area estimated to comprise the PTA and STAs would divide their patronage between the existing centres at Leichhardt, Ashfield, Marrickville, Dulwich Hill, Summer Hill and to a lesser extent, Marrickville Metro.*

The estimated catchment areas represent only a proportion of the catchment areas of these centres.

- The preceding assessment demonstrates that in addition to expenditure that may be available from residents in the immediate neighbourhood, in 2016 the retail component of the proposed development would need to attract around 38% of available supermarket expenditure from households within the PTA, 14% of supermarket expenditure from STA West households and 17.6% of supermarket expenditure from STA North households in order to achieve forecast turnovers. In terms of convenience retail expenditure, if 10% of convenience retail expenditure from households in STA West and STA North was directed to proposed specialty retail outlets, these outlets would need to attract around \$9.5 million or 13.4% of convenience retail expenditure from PTA households in order to achieve forecast turnovers in 2016, leaving a reasonable proportion of expenditure available to be directed to facilities in other centres;*
- The largest of the other retail centres in the area have very extensive catchments. The catchment areas of the proposed retail facilities only account for a small proportion of the overall catchment of these centres. Even the catchment areas of the Dulwich Hill and Summer Hill local centres only include parts of the catchment area of the proposed development. Therefore, any potential impact of the proposed facilities is diluted somewhat as the existing centres have established catchments of which the notional catchments account for only a part;*
- The smallest of the other retail centres in the area can continue to function to service their immediate catchment (in the case of Lewisham) or their specialised role (in the case of Petersham). The services offered in these centres are complementary to those likely to be offered on the subject site; and*

Some concern is raised over the manner in which these conclusions were reached, in particular the accuracy of the 'estimated catchment areas', which appear to have been based solely on the consultant's estimates. Regardless of the accuracy of the economic impact assessment the proposed supermarket and retail components of the concept plan raise serious concerns in relation to its effect on the strategic direction that has been established for the area through Council and the Department's planning frameworks and the ability of this to be undermined through an incongruent process.

The extent of retail space proposed (particularly the proposed 2,800m² supermarket), coupled with the number of dwellings proposed elevate the centre to something more akin to a town centre role. This would render the subject site incompatible with the definition of a neighbourhood centre within the dSSS as containing one or a small cluster of shops and services. This is confirmed by the applicants own economic impact statement, which indicates that the proposed supermarket would attract shoppers from surrounding centres (e.g. Dulwich Hill, and Summer Hill). This represents a significant departure from the consistent strategic directions established for the area and should be addressed at an appropriate policy level rather than through the equivalent of a development assessment process.

Accordingly, the fact that there is a measured undersupply of retail floor space in the area does not in itself justify the provision of this land use on the subject site. Council does not support the proposed amount of retail floorspace included in the subject application. The inclusion of this level of retail floorspace would elevate the role of Lewisham, which is not supported in any existing strategic planning documents, including those prepared and endorsed by the Department.

Local flooding issues

Council's Development Control Engineer has provided the following comments in relation to flooding matters related to the concept plan:

Key issue 15 of the of the Director-General's Requirements is an assessment of any flood risk on the site in consideration of the NSW Floodplain Development Manual (2005) including the potential effects of climate change, sea level rise and an increase in rainfall fall intensity.

The NSW Floodplain Development Manual (2005) provides a framework to ensure the sustainable use of floodplain environments. The primary objective of the policy is to reduce the impact of flooding and flood liability, to reduce private and public losses from floods and to ensure that any new development is compatible with the flood hazard of the site and does not create additional flooding problems in the area.

This key issue has not been adequately addressed. The Environment Assessment report comments that the site is not flood prone with no investigation or analysis.

Although the site is not currently zoned as flood prone land (as Council has not undertaken a flood study of the Hawthorn Canal Catchment), it is very likely that the site is at risk of flooding as the Hawthorne Canal runs adjacent to the site west of the railway line. The site is located towards the bottom of a 300 Ha catchment which has had its natural overland flow path blocked by the construction of the Longport Street Rail Bridge. The Longport Rail Bridge forms a barrier to the north of the site blocking the overland flow of stormwater in excess of the capacity of the Hawthorne Canal as it passes under Longport Street. During extreme storms the culvert under Longport Street will be susceptible to blockage further exacerbating the potential for flooding of the site.

The site also is traversed by a Council 900mm stormwater pipe which enters the site at a low point in Old Canterbury Road (adjacent to the Old Canterbury Road/Henry Street intersection). The stormwater pipe continues to Brown Street where it converts to a 1200 diameter Sydney Water pipe which re-enters the site at Brown Street. The development proposes to block the existing overland flow path through site from Old Canterbury Road and to divert the pipe down the new Hudson Street. This has been proposed without any assessment of the resultant flood levels on Old Canterbury Road or the increased flood risk this may cause to residential properties opposite the site on Old Canterbury Road.

A flood study needs to be undertaken that fully investigates the potential for flooding from the Hawthorn Canal and from overland flows from the low point on Old Canterbury Road (near Henry Street);

It is noted on the stormwater plan by Cardno ITC (N09612-DA-H01 Rev 02) that the proposed location of the private OSD system is to be under a new road to be dedicated as public road. This is not acceptable. The OSD system shall be located fully on the development site and not encroach onto any future public road.

In light of the above advice, the Department should ensure the applicant prepare a flood study to fully investigate the potential for flooding from the Hawthorn Canal and from overland flows from the low point on Old Canterbury Road (near Henry Street);

Urban design comparison with the McGill Street Precinct masterplan

The following discussion provides a broad comparison between the proposed Part 3A application and the McGill Street Precinct masterplan.

Block/street/open space structure

Generally the Part 3A block/street/open space structure is similar to Council's masterplan. The main differences are as follows:

- The Part 3A has only one street accessed from Old Canterbury Road (opposite Henry Street) on the north side of the central park that connects McGill Street, whereas Council's masterplan has dual streets from Old Canterbury Road on either side of the central park. The removal of the street south of the central park means there will be no address for building entries, which diminishes Council's masterplan concept of the main retail being a continuous shop frontage strip along the southern side of the central park, where it has north orientation

and is adjacent to the main pedestrian movement route from Lewisham to Summer Hill across the Greenway/Light Rail through to the Allied Mills site.

This loss of address also reduces pedestrian activity, and surveillance for park safety. The orientation of the street on the north side of the central park is directly east-west compared to Council's masterplan that angles slightly to the north.

- The central park in the Part 3A has approximately the same area as under Council's masterplan and is generally rectangular in shape. Critically, the Part 3A dedicates less than half of the total park area from the subject site, with the remaining land to be dedicated as part of developments to the south. Under Council's masterplan the whole central park was required to be dedicated from this site. Further, under Council's masterplan the central park is narrower at the Old Canterbury Road end but fans out to be wider at the western end. This feature of Council's masterplan enables the wider end to better connect to the Greenway, Lewisham light rail stop and across to the Allied Mills site and Summer Hill. It also allows more flexible use of the wider park space at the western end.
- The Part 3A proposes a triangular shaped public open space area on top of the main shopping centre podium, between residential building blocks. It appears the levels allow access to this space off the 'green boulevard'. Given the level changes it is unclear if this will also be accessible from the north end (near the intersection of William and Brown Street).
- Council's masterplan extends Brown Street as a public street whereas the Part 3A is a pedestrian tunnel link under the main podium slab that connects the lower ground floor level that relates to the shopping centre entry front to the green boulevard and central park. This tunnel space will be unsatisfactory after retail hours due to it having no surveillance by residential dwellings above and likely to be avoided by pedestrians after retail opening hours, creating safety and security threats.

Site coverage and deep soil landscape area

As the Part 3A incorporates a large commercial floor plate to accommodate an internalised shopping centre with podium and one large basement, it has a much greater site coverage than Council's masterplan. The basement extends under the new street between the GreenWay and residential buildings and right to the boundary edge for Brown and William Street, making provision of substantial trees as shown on the landscape plans problematic. It is noted that the deep soil areas marked on the basement plan do not appear to relate to the location of the trees or landscaping areas above. Council's masterplan by contrast is a perimeter block form with large central courtyards, that has the potential to allow deep soil areas for trees and other landscaping (however the masterplan does not provide detail on the basement parking configurations to control this).

Movement/connections with surrounds

The Part 3A allows for the same movement and connections to the surroundings as Council's masterplan:

- Providing a new green boulevard street from a signalised intersection with Old Canterbury Road (at the intersection with Henry Street) that allows connection to the Lewisham commercial centre and Lewisham Station;
- Connecting to the future GreenWay, Lewisham West light rail stop and link across to the Allied Mills site and Summer Hill via the green boulevard;
- Retaining Brown Street and William Street (and introducing a pedestrian only extension of William Street through to the new green boulevard street); and
- Providing a new street between the GreenWay and residential buildings.

Under the Part 3A (and Part 3A alternate masterplan) the removal of the street on the south of the central park and displacement of the footpath further to the south no longer matches the direct visually legible Lewisham to Summer Hill route proposed under the combined McGill and Allied Mills Masterplans. The exact location of the Light Rail crossing proposed under the Sydney Light Rail Extension Environmental Assessment does not, however, accord with these masterplans, which will need to be addressed in combination with the masterplans and Part 3A assessments.

This submission recommends that there is a need for all three current Part 3A applications; being 78-90 Old Canterbury Road, Lewisham; the Allied Mills site in the Ashfield LGA; and the Sydney Light Rail Extension, to be assessed in a coordinated manner to realise the cumulative impacts of the developments. To facilitate this approach it is recommended that the application for the former Allied Mills site (2-32 Smith Street, Summer Hill) also be considered by a PAC, preferably with the same PAC chair and members. Furthermore, surrounding councils have recently prepared strategic planning documents for this area including the McGill Street Masterplan, dMLEP 2010, draft Marrickville Development Control Plan 2010 and the Ashfield Strategic Planning Strategy. It is essential that the Department of Planning and the PAC assess the Part 3A applications with reference to these documents.

The Part 3A provides additional connections than Council's masterplan through the triangular shaped open space and through the middle of the buildings adjacent to Old Canterbury Road, however it is unclear if these will allow unrestricted public through movement access, as they appear to be provided primarily to allow access to residential lift lobby entrances. The introduction of alternate pedestrian movement and open space paths disperses and fragments the main pedestrian movement paths (especially the Lewisham to Summer Hill route), creating illegibility and territorial ambiguity for pedestrians and creating potentially unsafe public spaces.

Orientation, street use activation & connection with ground levels

The Part 3A primarily orientates the development to front the shopping centre onto Brown Street and onto the internalised shopping centre "piazza", compared to Council's masterplan which orientates active frontages to all the surrounding streets (whether used for commercial, retail or ground floor residential) on all building sides. The layout does incorporate small retail spaces towards the central park, however these are only approximately 6m x 8m in size. There are also soho spaces addressing Old Canterbury Road and the eastern end of the new boulevard and central park.

Overall, there is less building edge facing the streets and less street use activation than Council's masterplan layout. This is particularly problematic at the south-western corner of the site which has a large building gap, a relatively blank 8 storey end wall and truck loading area for the supermarket, which is very poorly located opposite the future Lewisham light rail stop and connection across to the Allied Mills site and Summer Hill. Along the western street elevation adjacent to the GreenWay the plans indicate that the small shopping centre retail spaces may relate to this elevation but are more likely to be back of house, loading and waste storage areas with poor street activation and amenity.

Overall Massing, Form and Building Layout

The massing of the Part 3A application is similar to Council's masterplan, being 4 storeys along Old Canterbury Road stepping up to 9 storeys adjacent to the GreenWay. The differences are as follows:

- The Part 3A has an 8 storey building addressing Longport Street compared to 6 storeys under Council's masterplan.
- The Part 3A has 6 storey buildings directly west of Brown Street, compared to a mix of 4 storeys and 6 storeys under Council's masterplan.

- The Part 3A building elements adjacent to the central park to the west of Brown Street are a mix of 8, 6 and 4 storeys compared to 4 storeys under the Master Plan (3 storeys with 4th storey setback 4m). The Part 3A incorporates a gap between building blocks but overall the Part 3A is a much larger form adjacent to the central park and will allow less solar access to the central park.
- The Part 3A proposes a more fragmented building form with building blocks broken into smaller pieces compared to Council's masterplan. This type of layout/form has less space definition, which can create ambiguity over what is public and what is private or communal space. It does, however, create a greater building surface area, that potentially enables greater access to light and ventilation than Council's masterplan. Council's masterplan layout, by contrast, has a very strong perimeter block form by utilising continuous built edges. This creates greater definition of streets and open space, clearer definition of public front and communal internal courtyards, increases level of dwelling address towards the public streets and open space and greater street activation and surveillance of public space for increase visual interest, safety and security.
- The Part 3A massing has overall greater building depths and narrower separation between building blocks than Council's masterplan (however, the Part 3A layout avoids privacy problems that can occur with the perimeter block form of the masterplan at internal corners by utilising the more open layout/form).
- Generally, under the Part 3A there are few entry points via main lobbies and long central corridors are relied on. This arrangement is largely a result of the layout with the large lower ground floor shopping centre. The exception to this is the eastern end of the new green boulevard and Old Canterbury Road where there are soho frontages with multiple street entry. Overall it is expected the Part 3A would have lower street entry activation than that which could be achieved under Council's masterplan (with no large shopping centre podium form).
- In summary, overall the Part 3A is a larger form resulting in greater site coverage, less deep soil open space, greater site density, greater visual impact and less street activation. While there are a few advantages of the Part 3A layout, as discussed above, overall the proposal focuses on maximising the yield on the site and achieving internalisation of the development, compared to Council's masterplan that focuses on producing a quality public environment.

Independent urban design review of the Part 3A Application

Council engaged Olsson & Associates Architects Pty Ltd to undertake an independent urban design review of the Part 3A application. Key findings of the independent urban design review are:

- Block D (adjacent to Longport Street) and Block A (in south-western corner) adjacent to the central park are inappropriately scaled and will be visually dominant;
- The relatively wide gaps between buildings (compared to the contiguous perimeter block layout proposed in Council's masterplan) diminishes the expression and quality of streets and open space and the difference between public and private/communal space;
- Site permeability and legibility of the Brown Street extension has been compromised by blocking off with a shopping mall galleria and encroachment of building into the view shaft;
- Additional open space on top of the shopping centre is unlikely to accommodate substantial trees or landscaping;
- Recommendation that the amount of deep soil open space area be doubled from 13% to 25% of the total open space on this site and the width be doubled on this site to average 12m and the buildings north of the central park be setback 6m;

- Recommendation that the buildings north of the central park be 6 storeys (as opposed to a mix of 4, 6, 8 and 9 storeys in the Part 3A) with the 6th storey stepped back 6m;
- Recommendation that there be a greater separation between buildings in accordance with the Residential Flat Design Code (RFDC);
- That there is some poor solar and ventilation amenity with blocks C, D and F having deep building depth, Block D and F having bedrooms in the centre of buildings and high proportion of single orientation and Block D having 25% of units being south facing compared to 10% maximum under the RFDC;
- Density is due to large shopping centre development type, minimal deep soil open space, overdevelopment of site and some poor amenity dwelling design;
- Use of few building entries due to wide spacing of lift cores and long internal corridors (largely as a result of shopping centre building type), will not provide much street activation; and
- Greater dwelling mix is required.

The full assessment by Olsson & Associates Architects is included at **ATTACHMENT 1**.

Developer contributions and voluntary planning agreements

The proposed development would require development contributions in accordance with Marrickville Council's Contributions Plan 2004, together with the provisions of further items of public infrastructure. Not all details of the proposal have been provided at this stage so only a preliminary assessment of the further items of public infrastructure which would be required, together with the s94 contributions required under the provisions of Marrickville Contributions Plan 2004, are addressed in this submission.

The development of the McGill Street Precinct for residential purposes requires consideration of the need for public infrastructure that was not assessed, due to the subject site's industrial zoning, in the preliminary studies that informed Marrickville Contributions Plan 2004. It is therefore appropriate to assess what public infrastructure might be required, and if necessary, require development contributions or dedications for public infrastructure that are different or additional to those required in Marrickville Contributions Plan 2004.

Marrickville Contributions Plan 2004

Council's present Contribution Plan 2004 levies contributions for the following infrastructure categories:

1. Open Space, Parks Infrastructure and Sports Facilities
2. Public Libraries and Community Recreation Facilities
3. Traffic Management & Road Works.

Open Space, Parks Infrastructure and Sports Facilities

Marrickville Contribution Plan 2004 is informed by Council's Recreation Strategic Plan. The Recreation Strategic Plan, proposes additional open space should be acquired and embellished at the present rate of provision (due to the existing low provision rate of 1.61 hectares per thousand population).

Contribution Plan 2004 incorporates the provisions of Council's Recreation Strategic Plan and requires new residential development to provide additional open space at the rate of 1.6 hectares per thousand population. Because of the difficulty of finding suitable land for acquisition as open space in such a highly developed inner ring area such as Marrickville, Contribution Plan 2004 generally only charges contributions for embellishment to increase the carrying capacity of the

open space. Under the provisions of Marrickville Contribution Plan 2004 however, Council would acquire additional open space land as the opportunity arose. Thus Marrickville Contribution Plan 2004 provides the mechanism to accommodate a scenario where land may be able to be dedicated.

The extent to which open space, parks infrastructure and sports facilities contributions should apply to the application will depend upon the provisions of the proposed voluntary planning agreement to be prepared by the developer and open space to be dedicated.

Public Libraries and Community Recreation Facilities

Contributions should be paid in accordance with Marrickville Contribution Plan 2004.

Traffic Management & Road Works

Traffic management contributions are to provide traffic management facilities in local streets to address the additional requirements arising from increased mainly filter traffic as a result of new development. Road works contributions are to address the particular needs arising from the development of specific sites only.

Thus, in addition to the traffic management public infrastructure that might be required to address the specific requirements arising from development of the McGill Street Precinct, traffic management contributions in accordance with the provisions of Marrickville Contribution Plan 2004 should also be paid.

Open Space

The Marrickville LGA has an open space provision rate of 1.6 hectares per thousand population and Marrickville Contributions Plan 2004 provides the mechanism to acquire land in appropriate circumstances at this existing provision rate. The difficulties of finding suitable land noted in the Plan do not apply in the case of the McGill Street Precinct. Had it been appropriate for Council to consider the use of this large industrial site for residential purposes at the time of preparation of Marrickville Contributions Plan 2004, it is likely that part of the McGill Street Precinct would have been marked for acquisition.

The quantum of open space proposed in Council's masterplan is less than at the rate of 1.6 hectares per thousand population and therefore the full masterplan area of open space should be sought for dedication free of cost.

It is also submitted that the proposed open space serves a regional role given its connectivity to the GreenWay. In this regard and as outlined in the McGill Street precinct masterplan a proportion of this space could be funded by the Sydney Regional Development Fund. This could offset some of the developer's costs should these be found to be excessive via an appropriate review process.

Pedestrian and Traffic Facilities

Both Council's masterplan and the subject application highlight that development of the McGill Street Precinct will require the following:

1. Facilitation of linkages with those areas on the western side of the Rozelle Goods Line which include the former Allied Mills site.
2. The need for improved linkages across Old Canterbury Road with locations to the east including Lewisham railway station.

The concept plan puts forth three pedestrian crossing options of Old Canterbury Road as follows:

1. A bridge adjacent to Jubilee Street;
2. A crossing from Hudson Street to Henry Street; and
3. A crossing at the existing signalised Toothill Street intersection.

There are a number of alternatives for a bridge crossing of Old Canterbury Road. The concept plan proposes that the link to Lewisham Station could be via Jubilee Street through one or more of the properties at 6-14 Jubilee Street (to be purchased) to Jubilee Lane, Victoria Street and the Victoria Street underpass to Lewisham railway station. The Victoria Street underpass however provides only steps without disabled access. Due to the need to acquire properties that are not part of the redevelopment precinct this option is not considered viable.

An alternative bridge crossing option put forward by EcoTransit is supported for further consideration by Council. It would connect the northern end of the precinct including the Lewisham West light rail station to Lewisham railway station. The proposal would involve a pedestrian overbridge across the Longport Street and Old Canterbury Road intersection and the creation of a new entrance into the western end of Lewisham Station.

Development of this direct route would not preclude the development of the secondary walking route via Hudson Street, across Old Canterbury Road into Henry Street and Victoria Street to the existing entrance to Lewisham Station. This secondary route is outlined in Council's Masterplan for the McGill Street precinct. The effective functioning of this route, however, relies on the creation of a new signalised pedestrian crossing where Hudson and Henry Streets intersect with Old Canterbury Road which is not supported by the RTA.

Council's support for the alternative interchange option has been expressed in its 15 November 2010 submission to the Department of Planning on the Environmental Assessment for the Inner West Light Rail Extension and GreenWay. This is discussed later in this report.

Preliminary additional infrastructure assessment

The concept plan for the subject site is at the concept stage and therefore an assessment of the additional infrastructure required cannot be finalised. However a preliminary assessment has indicated that such development would likely require the following infrastructure:

1. The dedication and embellishment of open space adjacent to Hudson Street as shown in Council's Masterplan or in another reliable form.
2. A suitable east-west crossing across the light rail line between the Lewisham West station platforms.
3. A pedestrian bridge either across Old Canterbury Road adjacent to Jubilee Street or preferably across the Longport Street and Old Canterbury Road intersection to Lewisham Station.
4. An intersection upgrade and possibly signals at the intersection of Old Canterbury Road and Hudson Street.
5. Streetscape improvements to address the impact of the additional pedestrian traffic along Jubilee Street reserve, Jubilee Street, Henry Street, Toothill Street and Victoria Street and possibly Jubilee Lane.

The concept plan application is for development of part (albeit the major part) of the McGill Street Precinct. The development of the remainder of the McGill Street Precinct and the development of the Allied Mills site on the western side of the Rozelle Goods Line are also developments that are likely to benefit from and need to contribute to additional public infrastructure.

Council can assess development contributions applicable under the provisions of Marrickville Contributions Plan 2004 or a revised or updated version of that Plan, however, for the additional infrastructure required, it is appropriate that the developer prepare a voluntary planning agreement which includes other developments within the precinct.

Such an agreement should provide for an equitable division of the costs among the developers in accordance with appropriate basis of apportionment. Council requests that the Department, as the responsible authority for the three Part 3A projects in the precinct, coordinate an infrastructure plan for the precinct.

Affordable Housing

Part 5.1.10 of the Environmental Assessment provided by the applicant states as follows:

Given the absence of any specific requirements and that the proposal relates to a Concept Plan where the exact number of apartments is not fully resolved, it is premature to enter into a Voluntary Planning Agreement or define an exact number of affordable housing units. However, it is anticipated that up to 5 affordable housing units will be provided within the development with specific details provided under future project/development applications.

Given that the application is expected to accommodate as many as 400 apartments the applicant's preliminary projection of 'up to 5 affordable housing units' would result in an allocation of only 1.25% of the total residential portion of the development to affordable housing. This is a very low allocation and this report recommends that the amount of affordable housing dedicated by the developer should be determined through the negotiation of a voluntary planning agreement.

Considering the scale of the residential component proposed for the subject site, which is substantially greater than considered suitable under council's masterplan, a proposed 1.25% allocation of units for affordable housing is considered grossly inadequate. Further, it is considered unacceptable to propose a token approach to affordable housing provision on the basis that there are no specific requirements. This absence of any requirements is attributable to the Department's policy of preventing local Council's from implementing affordable housing schemes (most recently evidenced in the removal of provision from the dMLEP 2010).

Accordingly, as with the provision of appropriate infrastructure within the precinct Council requests that the Department coordinate appropriate and significant affordable housing contributions for development within the precinct. This would ideally be achieved through development of a VPA. Council's Director, Community Services has advised that an appropriate level of affordable housing contributions may be drawn from the examples of Landcom and City West Housing Company which are understood to have achieved at least 7.5% affordable housing in mixed residential developments.

Traffic and Parking

Traffix was commissioned by Lewisham Estates to undertake a Transport Management Accessibility Plan (TMAP) assessment of the proposed Concept Plan for 78-90 Old Canterbury Road. The report is to be read in conjunction with a previous report prepared by Planning Ingenuity for the Preliminary Environmental Assessment component of the Application under Part 3A of the EP&A Act.

The concept plan includes the following transport components:

- An internal road network to serve individual buildings and form part of the public road network;
- 681 car parking spaces, comprising of 400 resident spaces, 100 visitor spaces and 181 non-residential spaces – parking provided at reduced numbers (compared with council's requirements) to promote non-car travel modes;
- Four way signalised intersection at the junction of Toothill and Old Canterbury Road; and
- External road improvements.

In accordance with its 10 August 2010 resolution, Council in conjunction with Ashfield Council have commissioned Colston Budd Hunt Kafes Pty Ltd to conduct a detailed assessment of the application with regard to its traffic impacts on the immediate and surrounding areas. A preliminary assessment has identified significant impacts with the proposal, has questioned the practicality of proposed mitigation measures and recommended that a traffic simulation model be prepared. Furthermore, in light of the significant traffic issues identified the consultants have recommended a meeting should be held between Council, the Department and the RTA. Accordingly, Council requests that, due to the significant traffic issues involved with the proposal, an extension to the 7 January exhibition period be granted to enable Council's traffic study to be finalised and for the above meeting to be held.

A copy of Colston Budd Hunt Kafes Pty Ltd preliminary traffic assessment is included at **ATTACHMENT 2**.

Parking Requirements

The following table summaries parking requirements for each land use within the proposed development as contained within Council's DCP No. 19 (Parking Strategy) and the draft MDCP 2010; and the proposed parking spaces for each land use contained within the concept plan:

LAND USE	DCP 19	Draft DCP 2010	Proposed
Commercial (287.04m ²)	6 spaces	5 spaces	9 spaces
Retail (3218.5m ²)	141 spaces	140 spaces	92 spaces
Supermarket (2800m ²)	120 spaces	119 spaces	80 spaces
Residential (400 units)	Residents: 400 spaces Visitors: 100 spaces	Residents: dependent upon size of units Visitors: 50 spaces	Residents: 400 spaces Visitor: 100 spaces

The Traffic Management Accessibility Plan (TMAP) proposes to reduce parking requirements for non-residential land use by 33 percent, to 181 parking spaces. The reduction in available parking aims to promote alternate travel modes and achieve the DGR's target of a 10-15% decrease in private car travel. The TMAP suggests the further reduction of non-residential parking requirements if the light rail system is introduced.

Further, the TMAP proposed a reduction in required rates of visitor parking to permit on-street parking within the internal road network.

It is noted that the parking proposed within the concept plan is less than those required within draft MDCP 2010 (currently on public exhibition) and the current DCP 19. It is also noted that the subject site is well located to public transport options including rail, bus and, in future, light rail networks. Accordingly, Council supports the reduced parking rates as the area is well serviced by public transport links.

Relationship between proposed Lewisham Estate development and proposed Lewisham West light rail stop & GreenWay

The relationship between the subject application, Council's McGill Street Precinct masterplan and the proposed Lewisham West light rail stop as shown in the Environmental Assessment for the for the Inner West Light Rail Extension would appear to be satisfactory in terms of walking/cycling access. However, the Department should be aware of an alternative short/direct interchange proposal that has been put to Transport NSW by public transport advocacy group Ecotransit. Council considers this proposal has merit and is worthy of consideration, even though it is also acknowledged that technical difficulties may ultimately rule out this option. Following is an extract from Council's 15 November 2010 submission on the light rail Environmental Assessment, which further explains Council's position on this matter:

"Issue 5: Council would like to see further consideration of the Ecotransit proposal for a direct pathway link between Lewisham West light rail station and Lewisham Station (in addition to a secondary link via Hudson Street) involving a pedestrian bridge over the Longport Street and Old Canterbury Road intersection and the creation of a new entrance at the western end of Lewisham Station.

This issue has been raised in Council's submission on the PEA and at Light Rail Steering Committee meetings. Earlier in 2010, Ecotransit submitted to Transport NSW an alternative proposal for a short, direct walking link between Lewisham West stop and Dulwich Hill Station. The proposal meant that the light rail stop would be located just to the south of Longport Street so

as to minimise the interchange distance between light and heavy rail. The Ecotransit proposal would connect the light rail stop to a newly created western entrance to Lewisham Station via a set of ramps. Whilst Council considers this proposal has merit, it appears that Transport NSW has decided to retain the location of Lewisham West stop further to the south, close to the location that was originally advocated by Council in its McGill Street Precinct Masterplan. It would be ideal to create two links to Lewisham Station – a short link as proposed by Ecotransit and a longer link, via Hudson and Hunter Streets, as originally proposed by Council. It is acknowledged that the Ecotransit proposal may be difficult to achieve due to the need to create a new entrance into the western end of Lewisham Station. However, it has considerable merit as such a link would be very short and direct compared to the walking route along Railway Terrace. The Railway Terrace route is also unpleasant due to heavy traffic and a narrow footway.

Development of this direct route would not preclude the development of the secondary walking route via Hudson Street, across Old Canterbury Road into Henry Street and Victoria Street to the existing entrance to Lewisham Station. This secondary route is outlined in Council's Masterplan for the McGill Street precinct, which is intended to guide the Lewisham Estate development and future development in the vicinity. The effective functioning of this route however relies on the creation of a new signalised pedestrian crossing where Hudson and Henry streets intersect with Old Canterbury Road.

Issue 6: Council reiterates the need for careful co-ordination between Transport NSW, the Department of Planning, Marrickville and Ashfield Councils and the developers of the Lewisham Estate and Allied Mills sites in relation to Lewisham West Station to ensure this station maximises opportunities created by those developments and vice-versa. Such consideration will involve development of Voluntary Planning Agreements and/or Development Contributions to assist with funding of interchange infrastructure.

Planning staff from Marrickville and Ashfield Councils recently met to discuss issues and opportunities around the two major 'cross-border' development proposals that both focus on the Lewisham West light rail stop and GreenWay corridor, i.e. the Lewisham Estate development, within the Marrickville LGA, and the Allied Mills development, within the Ashfield LGA. At the meeting it was agreed that the Ecotransit proposal for a short, direct link between the Lewisham West stop and Lewisham Station had merit. Such a link could be partially or wholly funded by development contributions and/or a voluntary planning agreement for these sites, as could secondary walking/cycling links to this stop.

The Department of Planning, as the responsible authority for both developments, should ensure that these large and important developments take full advantage of the light rail, GreenWay and interchange between heavy and light rail - and vice-versa. The Department's consideration should take account all plans for these sites, including Council's 2009 Masterplan for the McGill Street precinct and GreenWay development principles developed in 2010 by the GreenWay Steering Committee.

The GreenWay development principles referred to above are at **ATTACHMENT 3**.

Council's masterplan adopted as its first strategy the need to provide an integral link between open space in the precinct and the proposed GreenWay. The open space located as provided in Council's masterplan would provide planning benefits not provided by the location proposed in the concept plan. The masterplan location would provide a view corridor from Old Canterbury Road to the proposed Lewisham West light rail stop and the GreenWay corridor, better integrate pedestrian access to the light rail stop, proposed to be located slightly to the north of Hudson Street and provide local open space in a location that also encourages access and use of the GreenWay corridor.

The Environmental Assessment for the Inner West Light Rail Extension shows, in Figures 6.1d and 6.13, two separate light rail stop platforms, both located to the north of Hudson Street and not, as shown in some of the concept plan documents, to the south of Hudson Street. The platforms are shown displaced and a rail crossing provided between them. Transport NSW has made it clear that

crossings of the light rail line, other than at the crossings adjacent to the station platforms, will not be supported.

The concept plan shows the need for a southern linkage across the proposed light rail line adjacent to Toothill Street. Given that Transport NSW is unlikely to support such a crossing, greater importance must be placed on the crossing at the light rail stop as the main walk/cycle link between the McGill Street Precinct and areas to the west. This further emphasises the importance of the role served by the crossing at the light rail stop and the appropriateness of locating open space directly adjacent to that crossing, as shown in Council's masterplan.

CONCLUSION

This submission has provided an evaluation of the concept plan prepared for 78-90 Old Canterbury Road, Lewisham. The submission raises a number of issues related to the proposed development including; scale of the proposed development; traffic and parking issues; open space provision and location; urban design considerations; consistency with strategic directions for the McGill Street Precinct and environs; infrastructure provision and affordable housing contributions.

This submission concludes that the concept plan is largely inconsistent with Council's masterplan for the McGill Street Precinct, particularly in relation to the scale of development proposed, the extent of retail uses, location of open space and development potential for the remainder of the precinct. Council submits that the concept plan should be amended to ensure consistency with Council's adopted masterplan.

Council considers that the concept plan, in its current form, represents a gross overdevelopment of the McGill Street Precinct with consequent repercussions on matters such as traffic generation (especially given the amount of proposed retail) and the cumulative effect of surrounding developments, such as the adjacent Allied Mills site.

Furthermore, it is recommended that there is a need for the Department of Planning to develop a coordinated approach for the McGill Street Precinct and environs. It is essential that a coordinated and consistent approach be applied to the McGill Street precinct and surrounding areas to ensure good planning outcomes for any development within the area. The concept plan fails to achieve this aim as it relates to part of the McGill Street precinct only. Therefore, Council requests that, to ensure the cumulative impacts of developments within the precinct are considered concurrently, the adjacent proposal for the Allied Mills site (2-32 Smith Street, Summer Hill) be considered by the same Planning Assessment Commission, preferably with the same chair and members, as it considering this subject application.

Council is concerned about the inclusion of areas of the precinct outside the subject site within the concept plan, as they do not form part of this application. Therefore, Council argues their inclusion, particularly in relation to open space provision, is disingenuous and creates a misleading picture of the subject application.