

20 December 2010

Major Project Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

Attention: Director, Metropolitan Projects

By email: plan_comment@planning.nsw.gov.au

Dear Sirs

Application No: MP08_0195 at 78-90 Old Canterbury Road, Lewisham

We are writing to express our concerns and objection to the above Concept Plan which is currently on exhibition as part of its Environmental Assessment.

Who are we?

The Summer Hill Action Group (**SHAG**) represents a number of local residents, many of whom reside in Summer Hill and Lewisham in Sydney's inner west.

Background - community referendum

In an unprecedented community referendum, Lewisham and Summer Hill residents voted overwhelmingly against plans for two massive, high-rise developments that straddle the two small neighbourhoods. Held over the Federal election weekend, some 94 per cent of the 1,500 Lewisham and Summer Hill residents who took part in the community referendum opposed the scale of the developments, which included the above application in Lewisham and the immediately adjacent Mungo Scott Flour Mills in Summer Hill.

The community referendum, coordinated by concerned residents including members of SHAG, was held at polling booths in Summer Hill and Lewisham on the day of the Federal Election (21 August 2010) and attracted significant community interest and response. Community consultation by developers of the sites has been limited and residents were surprised and concerned by the scale and scope of the plans currently under consideration including the application referred to above.

Specific concerns regarding the application

We have now had an opportunity to review the Concept Plan referred to above. SHAG's concerns, as a reflection of community sentiment, can be summarized as:

1. The Lewisham site is directly adjacent to the Summer Hill Allied Mills site (recently accepted by the Minister for Planning as a Major Project under Part 3A and exhibited on the Department's site) yet as the two sites are being developed independently the NSW Department of Planning is clearly not considering the *combined impact* of both developments on Summer Hill and Lewisham. This is highlighted by the fact that the Summer Hill Allied Mills site has only had DGRs issued recently.
2. There has been no independent traffic impact study of the Lewisham site or the combined sites – initial estimates from ARUP (commissioned by the developer of the Summer Hill site) suggest that both developments will generate more than 3,500 extra cars on the road every day. Yet Old Canterbury Road is already at capacity according to the developers' own statements.
3. The number of residential dwellings (400+) including up to 9 storey buildings is a gross over development of the Lewisham site. The surrounding neighbourhoods are largely made up of two storey terrace houses, and as such the proposal is at odds with the established and valued character of the surrounding locality. Therefore, we believe that the buildings in the Concept Plan are *totally incompatible with the surrounding locality and in particular detract significantly from the presence of the iconic Summer Hill 'Mungo Scott' flour mill which adjoins the site.*

4. The size of the proposed buildings will cause excessive shadowing at most times of the day which compromises the usability of much of the proposed development.
5. There is limited open space, no plans for parks or other amenities (childcare, health services, schools) – but combined these sites may add between 1,500-3,000+ extra people to the area. Further, the proposed green space for the Lewisham site appears to be on land outside the boundaries of the actual site, namely on an existing street. In short, the proposed provision of open space in the Concept Plan is grossly inadequate. The applicant states that 6609.5m² of public open space is to be provided (refer to Planning Ingenuity at page 28). However the Concept Plan does not depict how or where this quantum is actually achieved on the site.
6. The proposed retail and commercial space for the Lewisham site is excessive. Given that there are four supermarkets and more than adequate shopping facilities within walking distance of the Lewisham site, it is inappropriate to incorporate a 2,800 square meter supermarket. It is interesting that the report notes that the existing nearby road system has limited capacity to accommodate future traffic volumes and consequently proposes steps to moderate car usage by deleting commercial uses from the proposal.
7. There are no plans for any extra public transport, other than the light rail extension (assuming this goes ahead) from the Lewisham site, despite the dramatic increase in population.
8. Sadly, there has been little genuine engagement and consultation with the local communities or local councils.

As a result, SHAG requests that the Concept Plan be refused in its present form and calls on the Minister for Planning and NSW Government to:

- ☐ Undertake an independent study to assess the joint traffic impact of the Lewisham and Summer Hill sites.
- ☐ Scale back the current plans for massive high rises on the Lewisham site to ensure the development is sustainable in terms of traffic, transport, open space and local amenities.
- ☐ Consider the combined impact of the Lewisham and Summer Hill sites when assessing these applications.

Yours sincerely

Susan Terravecchia

Susan Terravecchia

**On behalf of the
Summer Hill Action Group**

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Amy Watson - Online Submission from Paul Gissel (object)

From: Paul Gissel <paulgissel@aapt.net.au>
To: Amy Watson <amy.watson@planning.nsw.gov.au>
Date: 28/12/2010 12:58 PM
Subject: Online Submission from Paul Gissel (object)
CC: <assessments@planning.nsw.gov.au>
Attachments: Submission-Paul Gissel.pdf

Submission contained in the attached PDF file.

Name: Paul Gissel

Address:
2/10 Eltham St.
Dulwich Hill NSW 2203

IP Address: c-59-101-33-235.hay.connect.net.au - 59.101.33.235

Submission for Job: #2923 MP08_0195 - Mixed Use Development
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2923

Site: #1835 78-90 Old Canterbury Road, Lewisham
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1835

Amy Watson

E: amy.watson@planning.nsw.gov.au

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SUBMISSION BY:-

Paul Gissel

paulgissel@aapt.net.au

| | |
|--|----------------------------------|
| Job Title: | Project Type: |
| MP08_0195 - Mixed Use Development | Residential, Commercial & Retail |
| Description: | |
| Concept Plan application for 7 building envelopes ranging in height from 4 - 9 storeys, comprising residential, commercial and retail floorspace, basement car parking, public and private open space and associated infrastructure works. | |
| Location: | Local Government Area: |
| 78-90 Old Canterbury Road , Lewisham | Marrickville Council |

I have read through the Environmental Assessment Report pertaining to the above major project. I am concerned that some of the conclusions are not supported by evidence presented in the report. In some cases there is a complete disconnect between the data provided and the conclusion drawn in the report.

In particular, the report concludes:

1. Traffic flows would improve at the intersection of Old Canterbury Rd / Longport St / Railway Terrace despite data showing the development would substantially increase traffic flow and no road improvements proposed to increase this intersections traffic capacity.
2. The proposal is considered to be compatible with existing developments in the area.
3. Supermarkets at Dulwich Hill and Summer Hill are currently overtrading due to shortage of competition.

1. TRAFFIC FLOWS WILL IMPROVE AT THE INTERSECTION OF OLD CANTERBURY RD / LONGPORT ST / RAILWAY TERRACE

Annexure 9 "Traffic, Transport & Accessibility Assessment" highlights that Average Delays per Vehicle (ADV) are rated at Level Of Service (LOS) that is deemed "Unsatisfactory and requires additional capacity" See pages 9, 60 and 64 of Annexure G.

None of the traffic management strategies proposed in the environment assessment report do nothing to increase the capacity of the Old Canterbury Rd / Longport St / Railway Terrace intersection. So it is difficult to understand how the assessment could derive the substantial improvement in traffic flows. See table on page 76 - 77 of Annexure G. outlined in Traffic, Transport & Accessibility Assessment.

Closer scrutiny of the methodology used to derive the improved traffic flows is required.

The assessment also overlooks the increased pedestrian traffic. The assessment puts a lot of emphasis on the developments residents using public transport. As such the number of pedestrians crossing Old Canterbury Rd at the intersection of Old Canterbury Rd / Longport St / Railway Terrace to get to and from Lewisham Railway Station will substantially increase. This particular pedestrian crossing effects westbound traffic on Railway Terrace. Any left hand turning vehicles are required to give way to pedestrians on this crossing. Because Railway Terrace has only one lane in either direction, any traffic stopping to give way will block all traffic behind them. Such traffic blockages rarely occur currently due to the low pedestrian traffic. You are lucky to get one pedestrian in 10 traffic light cycles in peak hour. But if the development proceeds, you can expect during peak hour most traffic cycles would encounter pedestrians and a high probability that cars yielding to pedestrians will block all west bound traffic on Railway Terrace.

Overlooking the effect of increased pedestrian traffic is a material oversight. Given that this particular traffic flow is already deemed as "Unsatisfactory and requires additional capacity", the development should not proceed until this information is disclosed and addressed.

2. PROPOSAL CONSIDERED TO BE COMPATIBLE WITH EXISTING DEVELOPMENTS IN THE AREAS

The focal point of the valley is the flour mill which is a much loved historical building which residents strongly identify with. It is a symbol of Summer Hill.

There are no other residential developments in the surrounding area greater than four stories. And to remain compatible with the surrounding areas the high of the towers should be capped at four stories.

3. SUPERMARKETS AT DULWICH HILL AND SUMMER ARE CURRENTLY OVERTRADING DUE TO SHORTAGE OF COMPETITION

In section 6.1.3 "Economic Impact Assessment" of the Environment Assessment Report, it asserts supermarkets at Dulwich Hill and Summer Hill are currently overtrading due to shortage of competition. There is no evidence in the report to support this statements.

It is well known that independent supermarket find it very difficult to compete with the supermarket giants of Woolworth and Coles. Independent supermarkets are unable to open the same long trading hours of Woolworth and Coles. The assertion that both Dulwich Hill and Summer Hill supermarkets have too much market power is ridiculous. The very opposition is true and further competition may lead to the death of independent supermarkets and higher prices for local residents.

CONCLUSION

Many of the benefits and conclusions drawn are not based on the evidence provided in the Environment Assessment Report. Rather, the conclusions drawn are very optimistic and unsubstantiated. The authors of the report need to explain the methodology used to derive such favourable conclusions particularly in the three areas identified above.

- 1) How can traffic flows improve at the intersection of Old Canterbury Rd / Longport St / Railway Terrace when the development will substantially increase traffic flows with no corresponding increase in the intersections capacity?
- 2) How is a 4 – 9 residential development compatible with the surrounding area? How is this statement quantified?
- 3) What is the evidence to support the reports claim that Dulwich Hill and Summer Hill supermarkets are overtrading due to a shortage of competition?

Furthermore the Environment Assessment Report needs to look at the impact of increased pedestrian traffic on vehicle traffic flows at the intersection of Old Canterbury Rd / Longport St / Railway Terrace. This has been completely overlooked in the report.

Without clarification of the above matters, the development should not proceed. Furthermore, action should be taken against the authors of the report where it is found that conclusions are unsubstantiated with the aim to deceive and give a positive outcome to the developer.

Amy Watson - MP 08_0195 : 79-80 Old Canterbury Rd Lewisham

From: Susan Standen <susanfelicity@gmail.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 26/12/2010 5:37 PM
Subject: MP 08_0195 : 79-80 Old Canterbury Rd Lewisham
CC: <amy.watson@planning.nsw.gov.au>

Name : Susan Standen
Address : 19 McGill St Lewisham NSW 2049

Application : Concept Plan for a Mixed Use Development at 79-80 Old Canterbury Rd Lewisham
Number : MP 08_0195

I object to the above application on the grounds that it is extremely poorly designed and makes no provision for traffic congestion it will cause in the local area.
It also will cause huge loss of sunlight to McGill St residents as well as unacceptable levels of traffic and I believe there are too many apartments for such a small area.
The height of the buildings is out of scale with the local area. The Floor to Space ratio is way too high.

I support the Marrickville McGill St Precinct Master Plan prepared for Marrickville Council by Hassell at http://www.marrickville.nsw.gov.au/planning/mcgill_street_precinct_master_plan.html?s=953690796

I do not support the Lewisham Estates proposal at all.

Regards
Susan Standen

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Amy Watson - Online Submission from [REDACTED] (object)

From: [REDACTED]
To: Amy Watson <amy.watson@planning.nsw.gov.au>
Date: 1/01/2011 11:29 PM
Subject: Online Submission from [REDACTED] (object)
CC: <assessments@planning.nsw.gov.au>
Attachments: Letter to Department of Planning re MP08_0195 Concept Plan.pdf

My letter has been attached. Please with hold my name from appearing on the department website

Name: [REDACTED]

Address:

[REDACTED] Grosvenor Crescent Summer Hill 2130

IP Address: [REDACTED]

Submission for Job: #2923 MP08_0195 - Mixed Use Development
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2923

Site: #1835 78-90 Old Canterbury Road, Lewisham
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1835

Amy Watson

E: amy.watson@planning.nsw.gov.au

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1st January 2011

Major Project Assessment
 Department of Planning
 GPO Box 39
 Sydney NSW 2001

Attention: Director, Metropolitan Projects

Application No: MP08_0195 at 78-90 Old Canterbury Road, Lewisham

I object to the above concept plan, which is currently on exhibition as part of its Environmental Assessment, for the following reasons:

1. The Lewisham site is directly adjacent to the Summer Hill Allied Mills site (recently accepted by the Minister for Planning as a Major Project under Part 3A and exhibited on the Department's site) yet as the two sites are being developed independently the NSW Department of Planning will not consider the *combined impact* of both developments on Summer Hill and Lewisham.
2. There has been no independent traffic impact study of the Lewisham site or the combined sites – initial estimates from ARUP (commissioned by the developer of the Summer Hill site) suggest that both developments will generate more than 3,500 extra cars on the road every day. Yet Old Canterbury Road is already at capacity according to the developers' own statements. Nothing has been proposed to cater for these extra truck and cars to and from the units and 6300sq m of supermarket, shops and offices. The long-term traffic measures are far from certain, as they require redevelopment of sites and street changes south of Hudson St, which is again beyond the developer's control.
3. The number of residential dwellings (400+) including up to 9 storey buildings is a gross over development of the Lewisham site. The surrounding neighbourhoods are largely made up of two storey terrace houses, and as such the high-rise buildings proposed are at odds with the established and valued character of the surrounding locality. A development with architectural integrity is needed rather than visual pollution that will spoil the much desired village life of this area.
4. There is limited open space, no plans for parks or other amenities (childcare, health services, schools) – but combined these sites may add between 1,500-3,000+ extra people to the area. The developer wants the needs of these residents and retail office users to be met on land South of Hudson St, beyond the borders of their actual site and on land don't own! Green space needs should be met on site. Mr Kelly himself has acknowledged that the government wants to "provide more opportunities for families to get outdoors, get active, and enjoy our beautiful natural environment," and yet very little green space has been provided for such a large number of people.
5. The proposed retail and commercial space for the Lewisham site is excessive. There are more than adequate shopping facilities and many within walking distance from the Lewisham site including Leichhardt market town, Summer Hill, Dulwich Hill and Petersham. It is unwarranted to incorporate a 2,800 square meter supermarket.
6. There are no plans for any extra public transport, other than the light rail extension (assuming this goes ahead) from the Lewisham site, despite the dramatic increase in population. Trains from Lewisham and Summer Hill stations are already overcrowded.
7. A high-rise development with lifts, cafés, restaurants, offices, pools, gyms and car parks that uses very large amounts of concrete in its construction, needs lighting, heating and air conditioning cannot claim to be environmentally sustainable.
8. There has been little genuine engagement and consultation with the local communities or local councils. Part 3A captures sights and developments that are deemed significant, therefore significant thought and planning needs to be undertaken by those who have made a conscious decision to live in the area. This sight is greatly significant to the character and "genius loci" of the area.

As a result, I call on the Minister for Planning and NSW Government to:

- Reject this plan
- Undertake an independent study to assess the joint traffic impact of the Lewisham and Summer Hill sites.
- Scale back the current plans for massive high rises on the Lewisham site to ensure the development is sustainable in terms of traffic, transport, open space and local amenities.
- Consider the combined impact of the Lewisham and Summer Hill sites when assessing these applications.

Yours sincerely

Name: [REDACTED]

Address: [REDACTED] Grosvenor Crescent Summer Hill 2130

3A Henson Street
SUMMER HILL NSW 2010
Email: sergis1230@optusnet.com.au

Attention: Director, Metropolitan Projects
Major Project Assessment
Department of Planning
Sydney NSW 2001

By email: plan_comment@planning.nsw.gov.au

Dear Director,

Re: Application No.MP08_0195 78-90 Old Canterbury Road, Lewisham, Concept Plan

I am writing to make known my objection to the above Concept Plan, for which an Environmental Assessment is currently on exhibition. I am moved to interrupt an overseas family holiday to write to you now.

I object for a number of reasons including the following:

1. **Masterplan DCP.** The Concept Plan pays scant regard to the Marrickville Council's Masterplan DCP for the McGill Street Precinct in virtually every respect.
2. As a consequence of the Concept Plan's mere nod to the Masterplan DCP, the Concept Plan is in many respects inconsistent with the Masterplan DCP.
3. **Density.** On any view, the density of the Concept Plan is far beyond what is reasonable. Further, the density is beyond what is contemplated by the Masterplan DCP. Small buildings around such towers will not diminish the impact on the existing scale and valued character of the locality but merely compound the misery. I am very concerned to avoid seeing the emergence of the Inner West's own Blues Point Tower or a mini replica of Chatswood or Hurstville.
4. **Height.** The proposed building heights are entirely inconsistent with the existing nature of the built environment, both residential and commercial. Building heights of 5 storeys are reasonable and consistent with the Masterplan DCP. Such a scale is more human. It is more amenable; more Milan or Paris, less Hong Kong or Singapore
5. **Commercial.** The Concept's Plan proposed inclusion of a supermarket and retail premises is completely unwarranted. The developer's objective clearly patent. There are numerous existing shopping areas and opportunities within easy reach by car and even foot. Why are existing shops at Leichhardt

Marketown, Ashfield Mall, Summer Hill, Petersham, Lewisham and even Dulwich Hill would not suffice to meet the needs of additional residents beggars belief.

6. **Open space.** The provision of both open public and private space is manifestly inadequate. In particular, the proposal that part of the public open space obligation of this developer be met by "future" development of adjoining property would be amusing if it wasn't so serious. This aspect of the Concept Plan is insulting to the intelligence of anyone who has even a passing regard to the Plan.
7. **Site streets.** The Concept Plan's street system completely ignores the Masterplan DCP. The Masterplan DCP clearly delineates a better way to manage traffic in and out of the site. The Concept Plan's street system is a poorly disguised attempt to maximize the development of the site at the expense of a proper street system. The proposed street system will inevitably result in a poor outcome for both residents of the site and other users of Old Canterbury Road.
8. **Traffic.** Any development of the site will result in adverse traffic outcomes. This assumption must be the starting point of any consideration of the traffic issues. The proposed scale of the Concept Plan will result in insoluble problems that can be avoided by allowing development of the site on a more modest and reasonable scale. I am astonished by the traffic impact published by Urbis. All one needs to do to see the existing difficulties at the intersection of Longport Street and Old Canterbury Road is to stand at the intersection any weekday between 6.15am and 9.15am. Traffic is often backed up to Summer Hill Station from the intersection! Just ask the SRA station staff. The traffic travelling north on Old Canterbury Road will always need to merge from 2 lanes to 1 under the Western Rail line. That there will be additional vehicles leaving the site is understood. What I ask for is that the number of vehicles be limited to what is reasonably contemplated by the Masterplan DCP. The creation of clearways, road widenings and other failed RTA fiddling is no answer. Rather, it will result in the certain and ugly ruination of the existing neighbourhood amenity with no tangible traffic solution.
9. **Summer Hill Flour Mill.** The Concept Plan should only be considered in the context of the Concept Plan for the proposed development of the adjacent Flour Mill Site at Summer Hill. To do otherwise makes little sense. There is a very rare opportunity to develop 2 large adjacent sites in a complimentary way. To miss such an opportunity would be a great shame to say the least.

I must emphasize that I am not against development of this site. Indeed, I am in favour of it. There is a wonderful opportunity to create something truly beneficial to existing residents of the surrounding area and new residents of the site. Why should we not expect development of such sites to aspire to something that is a jewel rather than an ugly bauble?

Once done, the Proposed Concept Plan can never be undone. I implore those charged with assessment of the Concept Plan to have regard to the existing Master

DCP when assessing the Concept Plan. The Master DCP is a planning instrument that has been arrived at by the Marrickville Council after proper and fair consultation with the people in its community having regard to all interested stakeholders. The sole concern of the Concept Plan is commercial.

I respectfully submit that the Concept Plan be rejected. Its commercial objective overwhelms the wishes of the community and the Marrickville Council in every respect.

Yours faithfully,

Richard J.A. Sergi

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Amy Watson - Online Submission from [REDACTED] (object)

From: [REDACTED]
To: Amy Watson <amy.watson@planning.nsw.gov.au>
Date: 1/01/2011 11:33 PM
Subject: Online Submission from [REDACTED] (object)
CC: <assessments@planning.nsw.gov.au>
Attachments: Letter to Dept of Planning re MP08_0195 Concept Plan.pdf

My submission is attached. Please refrain from publishing my name on the department website.

Name: [REDACTED]

Address:
[REDACTED] Grosvenor Crescent Summer Hill 2130

IP Address: [REDACTED]

Submission for Job: #2923 MP08_0195 - Mixed Use Development
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2923

Site: #1835 78-90 Old Canterbury Road, Lewisham
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1835

Amy Watson

E: amy.watson@planning.nsw.gov.au

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1st January 2011

Major Project Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

Attention: Director, Metropolitan Projects

Application No: MP08_0195 at 78-90 Old Canterbury Road, Lewisham

I object to the above concept plan, which is currently on exhibition as part of its Environmental Assessment, for the following reasons:

1. The Lewisham site is directly adjacent to the Summer Hill Allied Mills site (recently accepted by the Minister for Planning as a Major Project under Part 3A and exhibited on the Department's site) yet as the two sites are being developed independently the NSW Department of Planning will not consider the *combined impact* of both developments on Summer Hill and Lewisham.
2. There has been no independent traffic impact study of the Lewisham site or the combined sites – initial estimates from ARUP (commissioned by the developer of the Summer Hill site) suggest that both developments will generate more than 3,500 extra cars on the road every day. Yet Old Canterbury Road is already at capacity according to the developers' own statements. Nothing has been proposed to cater for these extra truck and cars to and from the units and 6300sq m of supermarket, shops and offices. The long-term traffic measures are far from certain, as they require redevelopment of sites and street changes south of Hudson St, which is again beyond the developer's control.
3. The number of residential dwellings (400+) including up to 9 storey buildings is a gross over development of the Lewisham site. The surrounding neighbourhoods are largely made up of two storey terrace houses, and as such the high-rise buildings proposed are at odds with the established and valued character of the surrounding locality. A development with architectural integrity is needed rather than visual pollution that will spoil the much desired village life of this area.
4. There is limited open space, no plans for parks or other amenities (childcare, health services, schools) – but combined these sites may add between 1,500-3,000+ extra people to the area. The developer wants the needs of these residents and retail office users to be met on land South of Hudson St, beyond the borders of their actual site and on land don't own! Green space needs should be met on site. Mr Kelly himself has acknowledged that the government wants to "provide more opportunities for families to get outdoors, get active, and enjoy our beautiful natural environment," and yet very little green space has been provided for such a large number of people.
5. The proposed retail and commercial space for the Lewisham site is excessive. There are more than adequate shopping facilities and many within walking distance from the Lewisham site including Leichhardt market town, Summer Hill, Dulwich Hill and Petersham. It is unwarranted to incorporate a 2,800 square meter supermarket.
6. There are no plans for any extra public transport, other than the light rail extension (assuming this goes ahead) from the Lewisham site, despite the dramatic increase in population. Trains from Lewisham and Summer Hill stations are already overcrowded.
7. A high-rise development with lifts, cafés, restaurants, offices, pools, gyms and car parks that uses very large amounts of concrete in its construction, needs lighting, heating and air conditioning cannot claim to be environmentally sustainable.
8. There has been little genuine engagement and consultation with the local communities or local councils. Part 3A captures sights and developments that are deemed significant, therefore significant thought and planning needs to be undertaken by those who have made a conscious decision to live in the area. This sight is greatly significant to the character and "genius loci" of the area.

As a result, I call on the Minister for Planning and NSW Government to:

- Reject this plan
- Undertake an independent study to assess the joint traffic impact of the Lewisham and Summer Hill sites.
- Scale back the current plans for massive high rises on the Lewisham site to ensure the development is sustainable in terms of traffic, transport, open space and local amenities.
- Consider the combined impact of the Lewisham and Summer Hill sites when assessing these applications.

Yours sincerely

Name: [REDACTED]

Address: [REDACTED] Grosvenor Crescent Summer Hill 2130

George Mylonas
10 Hobbs Street
LEWISHAM NSW 2049

21 December 2010

Director, Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Re: Application No: MP08_0195 78-90 Old Canterbury Road, Lewisham

I am writing to express my objection to the above concept plan. Please find below the reasons for my objection to the proposed development's concept plan.

The proposed development is completely out of scale with the Lewisham locality. The development needs to look at how it can better blend in with its surrounds. The proposed tiered approach is acceptable but the building height of nine (9) storeys is grossly out of scale and will result in the overdevelopment of the site. Consideration needs to be given to alternative residential accommodation such as terraced housing mixed with lower rise apartment blocks which would better suit the location of the site in a residential neighbourhood.

The proposed floorspace of the supermarket is excessive. Given the argument that the supermarket is to service the local community it needs to be of a much smaller scale. Lewisham has a small population size and the community already has access to a range of supermarkets within walking distance such as Summer Hill, Dulwich Hill, Leichhardt and Petersham. Also if the supermarket is to service the local community there should be limited or no parking available for shoppers as it is within walking distance. The impact of the proposed development's retail spaces also needs to be further considered with regards to its likely impact on the local shopping strips which currently enhance community interactions.

Increased traffic congestion and gridlock of the roads surrounding the development. The development site provides a great opportunity for the state government to show leadership and vision. We know that the built environment can facilitate and hinder human behaviours. Given that the site is located at a transportation hub with easy access to trains, the proposed light rail and several bus routes, the government and developers need to look at how the development

can better encourage public transport use and the benefits of walking, and discourage motor vehicle usage. This can possibly be achieved by limiting the parking spaces available at the development and having the development's residents access community sharecars. This approach would also reduce the significant detrimental affect the development would have on the current traffic gridlock during peak periods.

The development does not clearly take into consideration the impact of other developments earmarked for the area. That is further developments along Old Canterbury Road and the silo development in Summer Hill. The developers are operating in isolation and traffic reports do not give clear consideration to the overall impact of all the developments proposed for the locality. It appears that a joint masterplan between Marrickville and Ashfield councils needs to be developed before any concept plan can be submitted. Further, the development does not outline how it will link to the proposed development of the silos in Summer Hill. Urban planning principles need to be taken into account to enhance all the community's usage of the sites.

I understand that there is a need to balance the needs of the local community with the developers' desire to make profits and the government's need to create more residential housing. The Lewisham site provides a great opportunity to create a unique and desirable development which will meet the needs of all parties. The government, developers and urban planners need to look at how people live now, how they are likely to live in the future and how the government wants them to live as well as environmental considerations. This would assist in creating a development with a point of difference in the current market and provide a prototype for future developments close to transportation hubs. I request that the concept plan be rejected by the Department until all the areas outlined above are given due consideration.

Yours faithfully,

George Mylonas

28 Carrington Street

SUMMER HILL NSW 2130

29th December 2010

Attention: Director, Metropolitan Planning

Major Projects Assessment

Department of Planning

GPO Box 39

SYDNEY NSW 2001

(emailed
29/12/10)

Email: plan_comment@planning.nsw.gov.au

Dear Ms Watson

RE: Application No. MP08_0195 78-90 OLD CANTERBURY ROAD, LEWISHAM CONCEPT PLAN

Following are my objections to the above Concept Plan with reasons given under each heading below.

I have had regard to the DGRs issued 16/3/09 and the exhibited plans/written reports which comprise the Environmental Assessment (EA).

1. Height, Bulk and Scale, Building Impacts and Character

Despite statements to the contrary in the (overall) EA report of Planning Ingenuity and plan comments by Tony Owen Partners, the Concept Plan provides for a series of buildings on the applicant's site (and recommended for the balance of the McGill Street precinct beyond the applicant's site) which is totally incompatible with the immediate and surrounding locality.

The building mass and scale and the rising heights will dominate the locality and compromise the value of what are already minimal public and private spaces depicted on the plans. I have no confidence that there is compliance with the provisions of SEPP 65, given the numerous inconsistencies in the plans and/or their lack of credible detail.

The locality comprises single and 2-storey attached and detached dwellings of late 19th/early 20th century styles and vintage, with iconic structures such as the Mungo Scott flour mill, railway viaduct and St Andrews church spire at Summer Hill. This concept plan brings a form of development uniformity and scale which is in no way responsive to this setting.

This Concept Plan will not lead to a quality development and its approval will set a poor standard for the balance of the precinct. The DGRs require that consideration be given to the (now being exhibited) Marrickville Council McGill Street Master Plan, not that the applicant

present his own version! Furthermore I consider that comments in the EA and on the plans that there is broad compatibility and similarity to the Council's overall master plan area an attempt at 'passing off'. It is clear that the proposed residential density and sizeable amount of retail floor space for the site alone means that this Concept Plan is at a scale and intensity far beyond that shown in the Council's master plan.

2. Public Open Space

The provision of open space in the Concept Plan is grossly inadequate and statements made by Tony Owen Partners to the contrary are clearly false. The applicant states that 6609.5m² of public open space is to be provided (Planning Ingenuity p.28) and that his '...master plan has been designed to incorporate substantial public open space and park land.' (ibid p.35). If by 'master plan' is meant Plan 8.2 and the landscape plan prepared by Site Landscapes, only a small fraction of this open space is provided on the applicant's site. The applicant seeks to benefit by including the publicly-owned Greenway corridor and areas from the Allied Mills site to the west, as well as notional provisions from privately owned land beyond his control to the south, as land which will meet the open space requirements for his development.

Focusing on the applicant's site alone shows that the 'central park' of the landscape master plan is in reality a street lined by trees ('green boulevard') of total area 900m² and overshadowed by adjacent buildings. With the supermarket and retail centre below much of Park 1, this park will at best be a paved plaza with possibly some grassed sitting areas, no deep-planted trees and perhaps some children's play equipment/exercise area, flanked by pathways and tall buildings (as little as 10 metres apart) is to be provided.

The existing ratio of public open space in the Marrickville LGA is given by Council as 16.1m² per person. Yet the applicant considers providing the 3,140m² of public open space proposed in the Council's McGill St Master Plan (just 3.14m² per person) from within his site is 'inequitable' and an 'unfair burden'. It is the applicant however who wishes to house 1000 new residents (viz 400 units) on this industrial site – their open space needs should be met on that site, just as future residential developments south of Hudson Street would be required to do. To transfer responsibility for open space to future developers of other sites, to be met in addition to what those sites will require, is inequitable and unfair.

3. Supermarket and Retail

The Economic Impact Assessment report does not address whether there is current unmet demand for more retail facilities. The Primary and Secondary Trade Areas appear contrived, to justify the applicant's intention to provide a substantial retail centre.

Aside from convenience for future residents living on-site there does not appear to be any reason why existing residents in the wider locality would come to a supermarket/retail shops on

this site (particularly given the reduced parking provision proposed). There are four (4) supermarkets in established shopping centres (with plentiful parking) all within 1.5 kilometres of the site

The Lewisham neighbourhood centre is on the direct route to the nearest rail station (Lewisham), a 3.5 minute walk from the site. While only ten (10) of these properties are in retail/commercial use, the Marrickville Village Centres Urban Design Study (3/09) proposes major upgrading of the streetscape. This combined with the extension of the neighbourhood business zoning (in the DLEP 2010 now on exhibition) to include ALL the existing and former (20 in total) shop premises will provide further scope. This neighbourhood centre should be supported, not a new centre created on this Part 3A site. There are too many examples of mixed developments in Sydney where new retail floorspace (small and large) has remained unoccupied, which benefits no one.

4. Traffic, Parking and Servicing

The Transport Management & Accessibility study conducted by Traffix is silent on access and design of car parking and loading dock(s) and does not address service vehicle movements for the supermarket/retail components of the application, despite these issues being specified in the DGRs.

The study report notes that the existing nearby road system has limited capacity to accommodate future traffic volumes and opts to provide 1 car only per residential unit (regardless of size/likely occupancy) with reduced levels of retail parking to promote non-car use and reflect the 'local' (viz walk- to) centre envisaged. However the amount of retail floor space proposed indicates this is **not** a local (neighbourhood) scale. The Economic Impact Assessment indicates that the supermarket and shops will rely for their success on trade coming from beyond the immediate locality. This will mainly be by car, so that readily available and accessible parking will be a necessity.

The report is silent on the cumulative impact of the Part 3A Allied Mills Concept Plan on traffic flows on the same adjacent main roads. This proposed residential/retail re-development has been in planning for some 2 years and has been referred to in other reports done for this Environmental Assessment. Both Ashfield and Marrickville Councils have requested that a traffic assessment be conducted which includes this Concept Plan, the wider McGill Street precinct and the Allied Mills site and adjacent Edward Street lands. With no such assessment conducted, what confidence can there be that the minimal traffic measures proposed by Traffix will have any real effect? Peak period congestion times will only be further extended and failing intersections gridlocked.

5. Community Consultation

I was an attendee at the community consultation day held at Petersham RSL. I expressed concern to the applicant's representative (and to members of the Urbis team) at the extent of inconsistency between plans exhibited, the factual errors in those plans and the conflicting answers I heard given to the same questions asked by many during the hour I was present. I was left with a feeling of unease that relevant matters had not been seriously considered (and were unlikely to be) and that the entire application process would continue to be one aimed at achieving a concept plan approval that maximized site \$ value for on-sale, all at minimised cost to the applicant. Having examined the plans and reports of the Environmental Assessment now on exhibition, my concerns remain.

The approval of this Part 3A Concept Plan will carry forward set parameters for future development applications for this site. The scale, bulk, massing, height and density of residential and retail development depicted in the Concept Plan is not in the interest of future occupiers and users of the site or that of the surrounding locality.

The Concept Plan will not foster quality renewal of this industrial site – it should be rejected so that Marrickville Council's co-ordinated master planning of the entire precinct can be finalised, which is beneficial to all precinct owners/occupiers and the community.

Yours Sincerely



DAVID ROLLINSON

BA, Dip T&CP, M Science (Arch) (Cons), Sydney University

Dip Urban Studies, Macquarie University

PhD, University of NSW



1 (29)

Vincent Scaturro
4 William St
Lewisham NSW 2049

ATTENTION: Director , Metropolitan Projects,
Major Project Assessment,
Department of Planning
GPO Box 39,
SYDNEY, NSW, 2001.

23-33 Bridge Street
SYDNEY, NSW, 2000

30, December, 2010

Dear Sir,

RE: Application No: MP08-0195 78-90 Old Canterbury Rd, Lewisham – Concept Plan

BACKGROUND:

- My family and myself are the owners of numbers 2, 4 & 6 William Street, Lewisham where we have resided for more than 30 years.
- We are also the owners and business operators of JCV Pty Ltd – a small business reproducing architectural mouldings - situated in Longport St, Lewisham, that has been continually in existence since 1975.
- As a result, my family and myself are going to be severely and deleteriously impacted by the above concept plan. Not only are we in the immediate vicinity where development will go up, over and around our residences leading to residential property devaluations but we are also likely to suffer significant and on-going impacts to our small business.
- As long term residents as well as small business owners. we therefore strongly **OBJECT** to aspects of the above Concept Plan for which an Environmental Assessment is currently on exhibition.
- We **OBJECT** for the following **SPECIFIC** reasons on the following grounds:

DG'S REQUIREMENTS – SITE AMALGAMATION

I note the under the **Director-General's Requirements** issued on 16/3/09 to Proponent, Tony Owen NDM Architects & Planners that:

- "The proposal should seek to amalgamate with the properties at the corner of Langport Road and Old Canterbury Road so that a more appropriate and reasonable relationship is established with surrounding development and land uses, and, details shall be included in the EA, and shall include details outlining negotiations with the owners of the affected properties."
- "If this is demonstrated to be not possible, the EA shall assess, in detail, possible alternative options for this land demonstrating that it can be appropriately and reasonably be integrated into the development and land uses proposed for the land immediately adjacent, and also give consideration to the viable future development of the isolated sites."
- "It is noted that the Marrickville Council have, as an objective, the co-ordinated master planning of the whole of the "McGill Street Industrial Precinct", and in this regard, the EA shall give consideration to the future integration of the Concept Plan into the residual of this precinct...."

ENVIRONMENTAL ASSESSMENT: SITE AMALGAMATION/SPECIFIC OBJECTIONS:

I note that in the **EA prepared by Planning Ingenuity** the general issue of the desirability of site amalgamation see - pgs 26 & 27- is addressed in the EA in the following manner:

- ".....It is not proposed in either the Lewisham masterplan study by Tony Owen Partners or Marrickville Council's McGill Street Precinct Masterplan to expunge the existing road network (Hudson Street, William Street, and Brown Street). To the contrary, the existing road network is retained as important access links and active street frontage spaces."
- "Amalgamation of the subject site with adjoining properties therefore offers no advantage and is not necessary in terms of a built form outcome."

We **OBJECT** specifically to the EA in respect of both of these statements.

Both statements inadequately address the substance of the Director-General's requirements, with a self-serving attempt to gloss over the substance of the DG's requirements in the EA by making the bald-face assertion that:

- "Amalgamation...with adjoining properties therefore offers no advantage and is not necessary in terms of a built form outcome".

EA - BUILT FORM AND LAND USES – SPECIFIC OBJECTIONS

Specifically, we **OBJECT** to that assertion and note that no evidence is advanced in the EA in support of either proposition contained in that assertion. Instead we cite the DG's requirements (Built Form and Land Uses) that:

"The proposal shall address the height, bulk, scale and intensity of the proposed development within the context of the locality". (DGR's).

We strenuously **OBJECT**:

- To the height, bulk, scale and densities and of the explanations contained for those densities in the EA.
 - The FSR of the Concept plan 3.5 to 1 is far in excess of densities recommended by Council in furthering the directions of the State Government's Metropolitan Strategy.
 - We note that the majority of proposed retail uses, including the proposed supermarket, is located within areas prohibited under the provisions of the draft Marrickville LEP (2010).
 - We note also and **object** to the fact that the Tony Owen Masterplan **neglects to highlight** the **large amount of below ground** retail space that significantly increases the scheme's overall GFA's.
 - This omission is self-evident from the table in Planning Ingenuity's EA – Table 3: Numerical Overview on page 28: This shows clearly that the concept plan features significantly higher GFA yields than those proposed for this mix-use redevelopment by Council, indicating a disregard by the proponent to the DG's requirements that:
 - *"The EA shall assess and give consideration to the loss of employment land in formulating final land use mix and gross floor areas for different uses.....*
 - "In particular, there should not be an excessive reliance on retail floor space, but rather a mix of different commercial and retail activities should be considered".*
- (DGR's – Built Form & Land Uses - pg 1).*

We therefore strenuously **OBJECT** that the concept plan proposes an unsustainable and inequitable level and ratio of residential and retail development on the site with consequential major impacts for my family and myself:

- To support that objection we refer to the Marrickville Urban Strategy (2007) recommending that the site be rezoned... "to cater for residential housing demand, address local amenity and provide space for community facilities." (Pg 18 MUS). We **object that the EA** does not adequately address these issues.
- We also **OBJECT** to the fact that the Part 3A Tony Owen Masterplan incorporates a large floor plate to accommodate an internalised shopping centre with podium and one large basement and, as a result, it therefore has a much greater site coverage and subsequent FSR ratio than the McGill Street masterplan. We believe it is an excessive over-development of the site that is most definitely not in keeping with the context of the locality.
- We note also and **STRENOUSLY OBJECT** to the fact that **Block D** (adjacent to Longport Street) under the Part 3A has an eight-storey building addressing Longport Street compared with up to 6 storeys under the Masterplan. **Block D is inappropriately scaled and will be visually dominant.**
- The Part 3 A Tony Owen Masterplan also has a 6 storey building directly west of Brown Street, compared to a mix of 4 storeys and 6 storeys under the Council Masterplan. **Block D is inappropriately scaled and will be visually dominant.**

We **OBJECT** that the Concept Plan together with the EA do not adequately address the built form issues as raised in the DG's requirements.

SPECIFICALLY, the EA fails to address not just the built form issues but also the proposed development within the context of the locality as per the DGR's and fails to adequately address the impacts to those in the immediate vicinity.

For example, on pg 26/27 of the EA the following statement is asserted:

- ".....It is not proposed in either the Lewisham masterplan study by Tony Owen Partners or Marrickville Council's McGill Street Precinct Masterplan to expunge the existing road network (Hudson Street, William Street, and Brown Street). To the contrary, the existing road network is retained as important access links and active street frontage spaces.

We **OBJECT** strenuously to this statement:

- Council's McGill Street Masterplan extends Brown Street as a public street whereas the Part 3A Tony Owen masterplan is a pedestrian tunnel under the

main podium slab that connects the lower ground floor level that relates to the shopping centre entry front to the green boulevard. The tunnel space will be unsatisfactory after retail hours due to it having no surveillance by residential dwellings above and is therefore likely to be avoided after retail opening hours, creating safety and security threats for those in the immediate environs.

- We also note that the Part 3A incorporates a large commercial floor plate to accommodate the shopping centre and one large basement that extends under the new street between the Greenway and residential buildings **right to the boundary edge for Brown and William Streets**, making the provision for substantial trees (as included in the concept plan) problematic due to the lack of deep soil provisioning. We therefore doubt the capacity of the Concept Plan to actually realise the proposed active street frontages.
- We therefore **object** to the attempt to mislead those in the immediate environs who will be most impacted by this development in terms of access links and active street frontages.

ADDITIONAL SITE AMALGAMATION OBJECTIONS:

Further, on pg 27 of the EA it is stated, again without equivocation, in specifically addressing the DG's site amalgamation requirements, that:

"The proponent of the Concept Plan also holds ownership over three (3) sites that are located within the north eastern corner of the McGill Street Precinct (bounded by Longport St, Old Canterbury Rd, William Street and Brown Street)". EA pg 27.

This response in the EA is offered as a direct response to the DG's requirements that:

- *"It is noted that Marrickville Council have as an objective, the co-ordinated master planning of the whole of the "McGill Street Precinct" and in this regard, the EA shall give consideration to the future integration of the Concept Plan into the residual of this precinct to the South, namely the land bounded by Old Caterbury Rd, Hudson Street and the rail corridor." DGR's – Site Amalgamation*

We **object to this statement** in the EA, as it does not **directly address** the DGR's and is an unreasonable and irrational response intended only to deflect any **direct response** to the DGR's.

We **FURTHER OBJECT** specifically to the obfuscations contained in the EA in relation to this aspect of the DG's requirements on site amalgamation.

We contend that the obfuscations appear deliberate and we therefore call upon the Department to check the veracity of these assertions and to respond to us accordingly. The proponent is after all seeking approval for a major development proposal that will have profound impacts not just upon my family but the entire locality. The language and assertions used are objectionable and we are concerned that they are intended to mislead.

For example:

- **"The proponent** of the Concept Plan, (identified in the DG's requirements as Tony Owen, NDM Architects and Planners) also holds ownership over 3 sites located in the north eastern corner of the McGill St Precinct...." Pg 27 of the EA.

We **DO NOT BELIEVE** this statement of facts is correct and we **respectfully demand** that the Department checks the veracity of this statement and the facts as alleged within it. Secondly, we ask that the Department demand that the proponent actually **directly respond to the substance of the DGR's that:**

- *"the EA shall give consideration to the future integration of the Concept Plan into the residual of this Precinct to the south...etc." DGR's*

To re-iterate, we **object to the completely unsatisfactory response** whereby the EA substitutes an example regarding the north eastern corner of the McGill Precinct to respond to DGRs issued about the **residual or southern parts of the whole McGill St Precinct.**

It is further stated on page 27 of the EA that:

- "Attempts have been made to acquire the remaining sites that are located at the north eastern corner of the McGill Street Precinct, however these attempts were not successful **with the existing owners either advising that they are not willing to sell or stating an unrealistic sale price.** A copy of the correspondence sent to the existing owners is provided in **Annexure 5** of this report."

We strongly **OBJECT** to this offensive and objectionable statement and the inferences made in it. (EA pg 27)

The DG's requirements clearly state:

- *"The proposal should seek to amalgamate with the properties at the corner of Longport St and Old Canterbury Rd, so that a more appropriate and reasonable relationship is established with surrounding development and land uses, and, details shall be included in the EA, and shall include details outlining negotiations with the owners of the affected properties."*

The facts in our **opinion** as asserted in the EA (with the correspondence in Annexure S) have not been tested and are therefore unreliable. They are also **prejudicial to all those directly involved and affected**. Certainly, the written statements made above in the EA have the potential to give rise to proceedings for defamation.

The **Annexure S** correspondence simply supports the unreliability of the facts as asserted. It is noted that there is no date on the file notes submitted and it is noted also that Annexure S in passing suggests a serious lack of endeavour by the proponent's real estate agent to **actually** meet the DG's requirements as above.

- In normal business if a developer wishes to genuinely negotiate a sale (irrespective of the sale price) an offer would be made in writing to the relevant landowner seeking, in normal business practice, an option to purchase the property at a future time subject to a number of provisos.
- At no stage – see correspondence in Annexure S – **was any offer made in writing** in accordance with proper business practice.
- Accordingly at law, **NO GENUINE OFFERS** were made nor any **GENUINE NEGOTIATIONS** undertaken.

EA & ANNEXURE S

Thus we strongly **OBJECT** to the assertions outlined in the EA (pg 27) and in Annexure S and wish to place on record our disappointment that the writer of the EA and the real estate agent have sought to discredit residents affected rather than endeavouring to meet the DGR's as clearly stated. The onus to provide evidence to support assertions made like those on page 27 of the EA is **squarely on the proponent and his consultants/agents** to make their case truthfully.

It is noted that the writer of the EA has certified to the best of his knowledge that:

- "The information contained within this Report is neither false nor misleading".

We also **STRONGLY OBJECT** and restate our belief that the DG's requirements have not been met in any substantial way:

WE contend that in the EA, a series of excuses, is simply unprofessional conduct by the proponent/s to deflect departmental attention way from their own lazy and desultory failures to satisfactorily meet the DG's requirements that: *"The proposal should seek to amalgamate with the properties on the cnr of Longport St and Old Canterbury Rd..."*

We note also that the EA shall assess, in detail, possible alternative options for this land and note that the **proponents in the Concept Plan and in the EA have utterly failed in our opinion to address any and/or all of the issues raised in the DG's requirements.**

ANNEXURE U - Peer Review Urbis

We also **STRONGLY OBJECT** to similar but even more ridiculous assertions being made, in Annexure U – Peer Review Urbis pg 10 that:

- "It is noted that the DGRs seek the amalgamation of the corner of Longport Street and Old Canterbury Rd ... (paraphrased by Urbis).....
- "Urbis therefore recommends that the scheme be assessed on its merits whether or not site amalgamation is achieved." Marc Lane, Snr Consultant, Urbis

While we agree that this major development should be assessed **strictly on its merits** we **STRONGLY OBJECT** to the implication arising in the above statement made in Annexure U that in effect recommends DoP assessment proceed despite the writer's clear belief that the **DGR's have NOT BEEN MET on Site Amalgamation.**

TRAFFIC IMPACTS/PARKING:

Background:

- It is noted that the Concept Plan site (covering approximately 50% of the northern part of the McGill Street Precinct) is isolated from surrounding neighbourhoods by the heavily congested Old Canterbury Road, Longport Street, the former goods-line and the heavy rail line west of Longport Street.
- It is also noted (without any contention) that traffic and access to and from the concept plan site will be an issue given the current surrounding traffic conditions particularly during peak times.

- Traffic volumes on surrounding streets sourced from Marrickville Council show daily traffic volumes on Longport Street of 19,328 (vehicles per day), on Old Canterbury Rd, of 19, 983 (vehicles per day) and on William St of 289 (vehicles per day). Data on vehicle movements per day for Brown Street are not available.
- During a site visit (source Marrickville Council – Transport Analysis - McGill Street Precinct – not the concept plan) on October 8, 2009 it was observed that the following traffic behaviour occurred:

There is currently no right hand turn from William Street to Old Canterbury Rd, which is currently being abused by drivers; That vehicles turn off Old Canterbury Road onto William Street and Brown Street to bypass the set of traffic lights on the cnr of Old Canterbury Rd/Longport Street.

It is noted in the EA 6.1.2 Traffic, Transport & Accessibility pg 57 that:

- "...The development concept has been substantially informed by the limited capacity of the road system to accommodate future traffic volumes, so that every effort has been taken to moderate car travel. This includes a substantial reduction in the amount of commercial uses on the site, with the predominate use being residential units, together with retail uses that are of a local nature...etc"

We **object** to that statement.

- It is quite clear that the assertion that every effort has been taken to moderate car travel by including a substantial reduction in the amount of commercial uses on the site with the predominate use being residential units is simply misleading and inaccurate.
- For example, Council's McGill Street Precinct Masterplan has a total GFA of 22, 237 sq metres whereas the Concept Plan covering only 50% of the site of the McGill Street Precinct has a total GFA of 45,902 square metres providing for more than 3 times the amount of retail floor space than was anticipated for the entire McGill Street Precinct.

Even more absurd are the following assertions in the EA on pg 57:

"The traffic report takes a holistic approach and considers the traffic generated for the entire McGill Street Precinct and not just the subject site. Analysis of local traffic conditions and parking transport within the locality reveals that a maximum density of 800 apartments can be accommodated within the

entire McGill Street Precinct with approximately 400 apartment from this total on the subject site. 800 apartments will accommodate 1, 800 residents and these will be served by the other uses on the site, reducing "external" traffic impacts."

WE OBJECT to the fact that there is a total lack of any supporting evidence put forward in the EA and in Annexure G of the report to back up this irrational assertion.

Indeed, we note that in Annexure G pg 27 the following:

"It is noted that the above arrangements are "interim" pending the redevelopment of the adjacent southern site (south of Hudson Street) at which time a long term traffic solution will be implemented with additional works, as discussed further below. This involves the construction of an additional 400 units on that site and this raised issues associated with the cumulative impacts on both sites.

"The resulting performance of key intersections is provided in Table 3 for the interim traffic solution is required to support the Part 3A Concept application."

Again we **OBJECT to the fact** that the EA and the TMAP Annexure G appear to pay lip service and not much more to the DGR's for Traffic Impacts as yet again a total lack of evidence -- but many excuses - are put forward in the EA and in Annexure G, as to why the proponent/s cannot satisfactorily meet the DGR's. Particularly galling is the intention exposed in the proponent's own words that the above arrangements are interim pending the redevelopment of the adjacent southern site that may not occur for decades, if at all.

SPECIFIC OBJECTIONS: Traffic & Parking Impacts

Little consideration if any is given in the EA and in Annexure G to the current predicaments faced by residents with street parking. **WE OBJECT to this omission:**

- William Street is used right now by not only residents of that street but also by residents that live in Old Canterbury Road on the East and Western sides. It is also used by rail commuters as are the surrounding streets from Hudson through to Victoria Street. In addition William Street will not cope with the amount of traffic generated by this development given it is a six metre wide small Victorian-era scale street as is let alone with the concept plans' suggested interim solution of allowing a left hand turn out of Old Canterbury Rd into William Street.

WE OBJECT therefore that no consideration has been given in the concept plan to the widening of William Street. In fact, the concept plan appears to preclude widening of

William St given the Tony Owen masterplan incorporates a large floor plate to accommodate an internalised shopping centre and one large basement that appears to mitigate against any road widening of Brown or William Streets.

We **OBJECT** that there has been no regard paid to this aspect and little regard paid to the traffic this concept plan is likely to generate apart from the generalisations and assertions made in the EA and TMAP- Annexure G:

- The interim solution proposed in the Concept plan (introducing the left turn in from Longport St into Brown Street, will not only create yet another rat-run for drivers seeking to avoid the traffic lights on the cnr of Old Canterbury and Longport Streets, but carries the very real probability that this interim solution will destroy my 35 year old business, my family's livelihood and the lively hoods of those employed by the business.

We strenuously **OBJECT** to this interim solution and note the lack of detailed examination/modelling as required by the DGR's in respect of Longport Street/Old Canterbury Rd intersection.

WE also **object in the strongest terms** to the issues of constant traffic congestion, noise levels, pollution and construction mayhem that this development will generate for existing residents of the entire locality.

SUMMARY

In summary, we **object to this concept plan**:

- The Tony Owen masterplan is a larger proposal in terms of the scale and density of future development within the precinct and in my opinion is a gross over development that will impact severely and deleteriously on my family, our small business and on existing residents within the context of the locality.
- The concept plan also fails to live up to the needs of future development in the precinct to be planned cohesively. We consider that the concept plan proposes an unsustainable and inequitable level of residential and retail development on the site and therefore fails miserably to meet the DGR's requirements.
- The lack of provision for open space and public amenity is ludicrously and woefully addressed in the Concept plan and compared against the Council's own "McGill Street Precinct Masterplan" it falls lamentably short.
- The Tony Owen masterplan is a larger form development with greater site coverage, has less deep soil open space, greater site density, greater visual impact and less street activation.

- It's simply a proposal to maximise the yield on the site that achieves internalisation of the development compared to the Council Masterplan that focuses on producing a quality public environment. It should be rejected in favour of a proposal with demonstrated community amenity and benefit.

A handwritten signature in black ink, appearing to read 'V. Scaturro', with a stylized, cursive script.

Vincent Scaturro

30

30 Victoria Street
LEWISHAM NSW 2049

1 January 2011

ATTENTION:

Director, Metropolitan Projects
Major Project Assessment
Department of Planning
GPO Box 39, Sydney NSW 2001

Re: Application No: MP08_0195 78-90 Old Canterbury Rd, Lewisham Concept Plan

Dear Sir

We wish to lodge an objection to the above Concept Plan, for which an Environmental Assessment is currently on exhibition. Having lived in the area for ten years it is clear that the density and scale of the proposed development is completely out of character with the surrounding locality and will significantly alter the amenity for local residents.

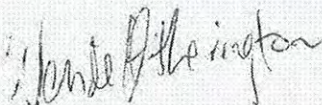
We acknowledge that some medium density housing is necessary and appropriate but the proposed development with buildings of 9 storeys - and up to 400 flats - is a gross overdevelopment more suited to Pyrmont than Lewisham. The proposed open space is virtually non-existent and completely inadequate for the site and will not necessarily come to fruition since most of the proposed 'green space' is on land not controlled by the developer.

We also suggest that it is completely inappropriate to not consider this proposed development in conjunction with another proposed development on the adjoining site (the Flour Mills) as together this area will become a high rise precinct of dubious quality and amenity, significantly changing the nature of the current residential suburb and no doubt creating a precedent for further high rise developments.

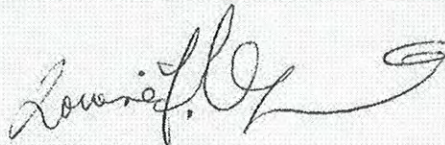
We have grave concerns about the impact of such a large development on the local roads, traffic and nearby parking. Already, as local residents without restricted parking, we are often unable to park in our street because of the number of commuters and visitors who do so. We anticipate this will only worsen with an increase of up to a 1000 residents not all of whose parking needs will be met on site. Canterbury Road is a two lane road which becomes one lane under the railway near the site and is already completely grid-locked with traffic during the morning and afternoon peak period. There is no proposal to deal with this increased traffic flow and the suggestion that the light rail will ameliorate this is untested and unlikely. What is likely is that previously quiet residential streets will be used as 'rat runs' to avoid the gridlock.

The proposed retail / commercial area is excessive and unwarranted as there are more than enough shopping facilities locally in Leichhardt, Summer Hill and Dulwich Hill. In nearby Petersham many shops are in fact unoccupied. It is likely that the proposed shops would struggle to survive and become dead spaces as well as affecting nearby successful enterprises.

We believe that Marrickville Council and the local community should not be overridden and that the Concept Plan should be rejected.



Ms Wendi Etherington



Ms Louise Chapman