

81

ATTENTION: Director, Metropolitan Projects

01. December, 2010

Major Project Assessment

Department of Planning

GPO Box 39, SYDNEY NSW 2001



PCU018168

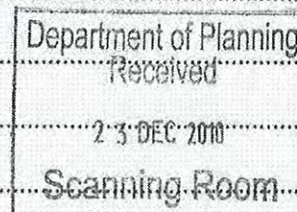
Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

RE: Application No: MP08\_0195 78-90 OLD CANTERBURY ROAD, LEWISHAM CONCEPT PLAN

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I wish to make some further comments about this Concept Plan :



Marrickville Council and the community's planning for this area should not be impeded or pre-empted – this Concept Plan should be rejected.

NAME: *Allyson Roberts*

ADDRESS: *18 Hugh Ave. Dulwich Hill 2203*



82

ATTENTION: Director, Metropolitan Projects

5. December, 2010

Major Project Assessment

Department of Planning

GPO Box 39, SYDNEY NSW 2001

Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

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NAME: Nathan Rodger and  
Shereena Sinnayali

ADDRESS: 20 Old Canterbury Road, Lewisham



6/1/2011

... December, 2010

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NAME: N. TIPALDO

ADDRESS: PO BOX 44 SUMMER HILL  
2130



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... December, 2010

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NAME: *SUDAN GARRAS*  
*Stepanov*

ADDRESS: *115 BRIGHTON ST*  
*PETERSHAM NSW*  
*2049*



85

To keep updated on developments visit - [www.nolewishamtowers.org](http://www.nolewishamtowers.org)

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NAME: Nicole Watkins

ADDRESS: 1/174 Enmore Road  
Enmore 2042.



86

ATTENTION: Director, Metropolitan Projects

9/.. December, 2010

Major Project Assessment

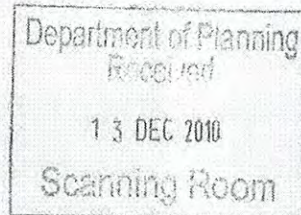
Department of Planning

GPO Box 39, SYDNEY NSW 2001



PCU017724

Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)



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NAME:

PETER HIGGINS

ADDRESS:

29 WINDSOR RD.  
DULWICH HILL  
NSW 2203.



87

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1<sup>st</sup> December, 2010

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NAME:

*Katherine Olston & Damien March*

ADDRESS:

*1/34 Fairmount St.  
Dulwich Hill NSW  
2203*





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Major Project Assessment

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GPO Box 39, SYDNEY NSW 2001

Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

Department of Planning  
Received  
7 DEC 2010  
Scanning Room

... December, 2010



PCU017512

RE: Application No: MP08\_0195 78-90 OLD CANTERBURY ROAD, LEWISHAM CONCEPT PLAN

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NAME: Deb Harris  
Chris Peck

ADDRESS:

10 James St  
Summer Hill  
NSW 2130



23rd December 2010

The Director General  
The NSW Department of Planning  
23-33 Bridge Street  
SYDNEY NSW 2000

Attention: Amy Watson

**MP08\_0195 - Mixed Use Development at 78-90 Old Canterbury Road, Lewisham**

## Introduction

This submission has been prepared by AMP Capital Investors (AMPCI) in regard to MP08\_0195. AMPCI own and manage the Marrickville Metro Centre located at 34 Victoria Road, Marrickville. As a major land owner and key stakeholder within the community AMPCI takes great interest in the on-going development and enhancement of area.

AMPCI objects to the above application for a Concept Plan for a Major Project comprising of a mixed use development including residential, commercial and retail uses at 78-90 Old Canterbury Road Lewisham.

We note that the exhibition period for the above project commenced on the 17<sup>th</sup> November 2010 and will close on the 7<sup>th</sup> January 2011.

## Reasons for objection

### Non-compliance with Draft South Sub-Regional Strategy

The proposal would be inconsistent with the draft South Sub-Regional Strategy as it would disrupt the identified retail hierarchy which defines Lewisham as a *"neighbourhood centre"*. The proposal would result in an additional, larger *"village"* centre. Within the draft South Sub-Regional Strategy a *"neighbourhood centre"* is defined as a *"one or a small cluster of shops and services"* which may *"contain between 150 and 900 dwellings."*

The proposal would result in the creation of an additional, larger *"village"* centre separate from the existing Lewisham centre which would result in associated traffic and amenity impacts which would further undermine the *"neighbourhood"* character of the area.

### Non-compliance with the Current and Future Planning Controls for Marrickville LGA

#### Marrickville LEP 2001

The proposal is prohibited under the current Marrickville LEP 2001, which zones the site as Zone 4 Light Industrial and therefore restricts the development of the land for residential flat buildings, commercial premises and some retail uses.

#### Draft Marrickville LEP 2010 (Draft MLEP)

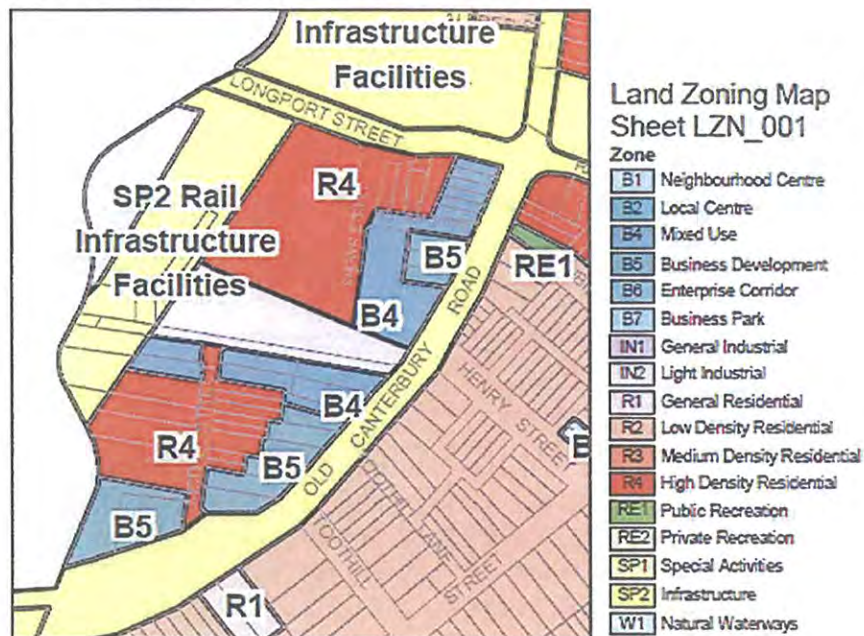
The Draft Marrickville Local Environmental Plan 2010 (MLEP) is currently on exhibition until the 4<sup>th</sup> February 2011 and is therefore imminent. The proposal is inconsistent with the draft MLEP, demonstrating non-compliance with the intended future development and growth of the area as follows:



#### Zoning and Permissibility

Some of the proposed uses are not permissible under the Draft MLEP. The site is partially zoned B5 Business development, in which "retail premises" are prohibited (refer excerpt of the Draft MLEP zoning map is included below as Figure 1). The proposed concept plan includes retail shops at ground level along the Old Canterbury Road frontage within this zone which would be prohibited under the draft MLEP. This will adversely impact the desired future character of the Lewisham area.

Figure 1 – Zoning Plan (Draft MLEP)



#### Non-Compliance with Floor Space Ratio

The proposal intends to utilise an excessive amount of gross floor area resulting in an over-development of the site. The permissible FSR for the site within the Draft MLEP is 1.7:1. The proposed concept plan proposes an FSR of 3.5:1 and thus departs from the prescribed FSR by 1.8:1.

The FSR non-compliance in this case is manifest in excessive bulk and scale. This over-development will negatively impact upon the character of the local area along Old-Canterbury Road which is typified by low scale residential uses interspersed with some low scale light industrial uses.

#### Inconsistent with the McGill Street Masterplan

The McGill Street Masterplan was completed in November 2009 to inform the rezoning of the site from light industrial land to mixed use and to support the creation of new controls for the site.

The Draft Marrickville DCP which incorporates the vision of the McGill Street masterplan includes the following Desired Future Character:

- "The precinct will accommodate **some minor service retail**, commercial offices and showrooms as well as studio, cafe and restaurant spaces. Through its masterplan it will integrate appropriately with the Lewisham and Summer Hill's longstanding heritage and cultural assets. The emergence of a new residential population and the addition of large, light-filled office and studio spaces, combined with the increased activation of the precinct through the generation of activity at the street level and the inclusion of a new area of public open space, will transform the McGill Street precinct. The precinct will now be a **desirable locality where people will want to live and spend time in**, a locality which will deliver social and environmental value to the Lewisham community."
- "4. To encourage a **village-type atmosphere** that complements and connects Lewisham and Summer Hill."

The proposal, which includes a large proportion of retail floor space (9,105m<sup>2</sup> in total), is not in line with the intentions of the McGill Street Masterplan which are to create a mixed use precinct including only "minor service retail" to complement the residential and commercial uses. Further the proposed development would be more akin to a shopping centre style of development as opposed to the intended "village-type atmosphere".



- “Brown street to become a residential street combining live/work studio spaces at street level” (as per Figure 45.1 McGill Street Masterplan).

The proposal includes retail frontages to Brown Street including a major supermarket and in general is dominated by retail uses at ground level. This will ultimately have a negative impact upon the existing local businesses in the area and generally detract from local amenity.

Further, the proposal substantially departs from the intended land use mix envisioned by the McGill Street Masterplan as follows:

Land use	McGill Street Masterplan (m <sup>2</sup> )	Proposed Concept Plan (m <sup>2</sup> )
Residential	20,344	39,646
Commercial	1,257	287
Retail	636	6,305
Supermarket	0	2,800

The inappropriate land use mix proposed by the concept plan is also seen by the excessive FSR proposed (refer draft MLEP).

### Oversupply of retail floor space in the area

The subject Concept Plan proposes an excessive quantity of retail floor space and seeks to create a new retail centre, as opposed to the local hub envisioned by the future planning controls for the site.

Marrickville Metro shopping centre is located within 3 kilometres of the site and therefore services the same catchment. Marrickville Metro is an existing shopping centre, which is being revitalised and expanded and therefore the creation of an additional “shopping centre” would not be appropriate.

Whilst the proposal purports to have a positive economic impact and provide an “*economic benefit to local business in the area*” it is apparent that the excessive quantum of floor space will actually detract from the existing local businesses and result in a negative economic impact. The Economic Impact Assessment supporting the application concludes that the supermarket will “*provide some competition which can have positive impacts for consumers in the form of reduced prices.*” This statement does not consider the impact that the proposal will have on the viability of the other, existing retail outlets within the area.

The land use mix proposed, and in particular the quantum of retail floor space including a substantial new supermarket, will contribute to a saturation of the existing retail market and will contribute to a development of unacceptable bulk and scale relative to the area. Such a development would not be in accordance with the desired future character for the area.

### Recommendation

AMPCI seeks to ensure the on-going sustainability and vibrancy of the area and therefore objects to the proposed development which includes a supermarket facility and excessive retail areas. It is considered not to be in the best interests of the local community as it will saturate the area with retail services and undermine key local planning objectives.

In conclusion, AMPCI considers that the proposal in its current form:

- Is currently prohibited on the land;
- Demonstrates non-compliance with the draft controls which seek a mixed-use outcome on the site complemented by minor retail uses to primarily service the proposed development;
- Demonstrates non-compliance with the draft South Sub-Regional Strategy and would result in a change in the identified retail hierarchy to include a new centre;
- Is inconsistent with the McGill Street Masterplan which envisions “*minor retail services*” to complement the new residential uses on the site;
- Demonstrates excessive bulk and scale as demonstrated by the substantial non-compliance with the draft MLEP FSR control;
- Includes an inappropriate land use mix as demonstrated by the departure from the proposed land use within the McGill Street Masterplan; and



- Will negatively impact upon the operation of nearby retail premises through the oversupply of retail floor space within the area.

We trust that our concerns will be considered and would appreciate the opportunity to address the Department of Planning further in relation to our submission.

Please do not hesitate to contact me should you wish to discuss any of these matters in greater detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'V. Walker', written in a cursive style.

Vanessa Walker  
Property Development Manger  
(02) 9257 1893



**SJB Planning**



Sydney  
Level 2, 490 Crown St  
Surry Hills NSW  
2010 Australia  
T 02 9380 9911  
F 02 9380 9922

Melbourne  
Level 1, Building D  
80 Dorcas St  
Southbank VIC  
3006 Australia  
T 03 8648 3500  
F 03 8648 3599

sjb.com.au  
planning@sjb.com.au

Director-General  
Department of Planning  
23-33 Bridge Street  
Sydney NSW 2000

Attention: Mr Sam Haddad

10 January 2010

**Submission – MP08\_0195 – 78-90 Old Canterbury Road, Lewisham**

Dear Director-General,

We are writing on behalf of EG Funds Management regarding the Concept Plan application for the proposed redevelopment of the land at 78-90 Old Canterbury Road, Lewisham. Our client owns an adjoining site known as 2-32 Smith Street, Summer Hill (former Allied Mills flour mill). Our client's site is also the subject of recent declarations (MP10\_0155 and MP10\_0180) authorising the preparation and lodgement of a Concept Plan and Project Plan for a mixed use redevelopment.

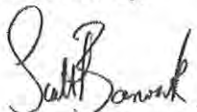
While our client does not oppose the intention to develop the land at 78-90 Old Canterbury Road, which is a positive outcome for the renewal and revitalisation of this potentially significant precinct, the nature and intensity of the development proposed raises a number of concerns that we must object to.

These concerns are detailed in the attached submission and relate to:

- The concept resulting in an inferior urban design and public open space outcome compared to the adopted McGill Street Precinct Masterplan
- Excessive intensity of development focussed upon the subject site at the expense of the development potential of surrounding development sites
- Inconsistency with the exhibited Draft Marrickville LEP 2010, particularly in relation to proposed FSR
- Unacceptable traffic impacts as a result of an excessive amount of non-residential floor space and an inappropriate concentration of retail floor space, including a supermarket
- The Concept Plan undermines the ability to provide a significant public open space area and through link connecting Lewisham and Summer Hill as proposed under the McGill Street Precinct Masterplan
- The inclusion of a high traffic generating land use to the detriment of the performance of the surrounding road network

Approval of the Concept Plan as proposed would result in a poor outcome for the potential of the McGill Street Precinct and the adjoining Summer Hill Flour Mill Precinct. Development should be required to be more consistent with the planning framework developed through the McGill Street Precinct Masterplan and the exhibited Draft Marrickville LEP 2010. Your consideration of our concerns is requested and should you wish to discuss any matters in this submission please do not hesitate to contact me on (02) 9380 9911 or alternatively by email at [sbarwick@sjb.com.au](mailto:sbarwick@sjb.com.au).

Yours sincerely,



Scott Barwick  
Associate



**SJB Planning**



**Attachment 1**

Submission to MP\_\_08 -- 78-90 Old Canterbury Road, Lewisham





## 1.0 Introduction

This submission relates to land known as 78-90 Old Canterbury Road, Lewisham and the Concept Plan application MP08\_0195. The subject application is seeking approval from the Minister under Section 75M of the *Environmental Planning and Assessment (EP&A) Act 1979* for a Concept Plan for a mixed use development of the land including residential, retail and commercial land uses.

Significant for consideration is the inclusion within the Concept Plan of 6,305m<sup>2</sup> of non-residential floor space that comprises:

- 2,800m<sup>2</sup> of supermarket floor space
- 3218.5m<sup>2</sup> of retail floor space
- 287m<sup>2</sup> of commercial floor space.

It is also a relevant consideration that since the Director-General's Requirements (DGRs) were issued on 16 March 2009, significant revision has been undertaken by Marrickville Council and the community to the planning framework applying to the site. The work undertaken has reflected the identification in the South Subregion Draft Subregional Strategy of the potential of what is now described as the McGill Street Precinct to be developed for mixed use purposes. In recognition of this potential and in response to the Draft Subregional Strategy the McGill Street Precinct Masterplan was adopted by Marrickville Council on the 10th November 2009. Further, the principles of the adopted Masterplan have been incorporated into the Draft Marrickville Local Environmental Plan 2010 (Draft MLEP 2010) through the application of proposed height and FSR controls that are consistent with the adopted Masterplan.

## 2.0 Development of the Planning Framework

The area bound by Longport Street, Old Canterbury Road, Edward Street and Smith Street is split between the local government areas of Marrickville and Ashfield. The area is separated by the former Rozelle goods rail line which is to be converted to light rail use. The lands are currently zoned for light industrial purposes. The lands are also covered by two Draft Subregional Strategies. The lands within the Marrickville Council area are covered by the Draft South Subregion Strategy while the lands within the Ashfield Council area are covered by the Draft Inner West Subregion Strategy.

The area as a whole has many common attributes such as declining light industrial use, proximity to existing passenger rail (Summer Hill and Lewisham stations) and access to the coming light rail service. The lands all enjoy a strategic access to services and facilities and attributes that could lead to the development of vibrant mixed use communities providing residential, employment and social opportunities for the broader area. In considering these attributes, it is critical that the interaction between the lands either side of the proposed alignment of the light rail are considered. This consideration relates to design principles that address matters such as public access through the area to the proposed light rail stop, the provision of public open space, the creation and permeability of new streets, and safety and security.

The McGill Street Precinct Master Plan (adopted by Marrickville Council in November 2009) and the preliminary Summer Hill Flour Mill Precinct Concept Plan (prepared for EG Funds Management – being application number MP10\_0155) include a series of consistent design principles and proposed development controls which consider the wider precinct as an integrated whole and address the scale of built form, building use, overshadowing, privacy and separation, as well as establishing an overall density.

The exhibited proposal for 78-90 Old Canterbury Road departs significantly from both the design principles prepared by Marrickville Council and the proposed development controls contained within Draft Marrickville LEP 2010, despite the statement in the Environmental Assessment (EA)





that the proposed Concept Plan (MP\_0195) is generally consistent with these controls. In this regard the Concept Plan works counter to efforts to achieve a considered, holistic precinct-wide design outcome.

### 3.0 Public Domain Changes

The EA for the Concept Plan presents the proposal as an improvement and refinement of the adopted McGill Street Precinct Masterplan. This assertion is not agreed with and it is considered that the proposed Concept Plan is in fact inferior to the adopted masterplan on a number of grounds. In considering the design principles and the adopted urban structure of the McGill Street Precinct Masterplan, the Concept Plan proposes to realign the proposed public park and generally moves the proposed park to the south. The EA in support of this change suggests that properties to the south, once developed, would complete the full extent of proposed public open space.

There are several detrimental implications that emerge from this approach to the development of the McGill Street Precinct and its relationship with the Summer Hill Flour Mill Precinct. The adverse outcomes include:

- The proposed public open space is not as generous as that defined in the McGill Street Master Plan. The McGill Street Master Plan anticipated a public park linking Old Canterbury Road to the former Rozelle goods rail line. The Concept Plan proposal for public open space is best described as a street or boulevard that will not offer the same flexibility of use or range of potential public activities. The provision, through the McGill Street Precinct Master Plan, of a meaningful extent of public open space was a prime expectation of the local community. It is also noted that the EA is factually incorrect in its comparison between the open space provision between the McGill Street Precinct Masterplan and the proposed Concept Plan. Figure 22 of the EA purports to compare the open space provision of the McGill Street Precinct Master Plan with the "Tony Owen Partners Scheme". Even a casual comparison of the two schemes as presented indicates that the additional "green space" in the "Tony Owen Partners Scheme" is in fact the alignment of the proposed extended light rail and land that forms part of our Client's holding as part of the Summer Hill Flour Mill Precinct.
- The proposed realignment of public open space means that under the Concept Plan proposal it will not be possible to see across and through the wider precinct from Old Canterbury Road to Smith Street. This will reduce the sense of spaciousness and openness, reduce clear sight lines, and impair the perception of public safety and security. Correspondingly, the apparent sense of density will increase because views terminate within the precinct under the configuration of buildings proposed in the Concept Plan.
- The Concept Plan proposal for public open space does not align with either the proposed public open space within the Summer Hill Flour Mill Precinct nor the proposed light rail stop. The proposed light rail stop location was negotiated by our client through consultation with the relevant government agencies to coincide with the configuration of public open space shown in the McGill Street Master Plan and the Summer Hill Flour Mill Precinct Preliminary Concept Plan. Relocating the public space further south as proposed in the Concept Plan for the Lewisham site will be to the detriment of clear, unimpeded access to the future light rail stop and the encouragement of pedestrian traffic through this current access-impaired light industrial area.
- The Concept Plan for the Lewisham site and the proposal for public open space can not be fully implemented with the development of the site. The Concept Plan proposal relies on the majority of proposed green space being implemented through the development of neighbouring properties to the south. This may take many years given the multiple and fragmented ownership of adjacent properties. The proposed realignment of public open space compared to Marrickville Council's adopted masterplan also does not consider the





corresponding reduction in development potential of landowners to the south, hence further reducing the likelihood of redevelopment beyond the Lewisham Concept Plan site or the eventual realisation of the full extent of public open space.

- Despite the claims in the EA, the Concept Plan proposal for public open space will suffer from greater overshadowing given that the park is generally narrower and edged by taller buildings than those proposed in the McGill Street Master Plan adopted by Marrickville Council.

#### 4.0 Proposed Density

The exhibited proposal for the Concept Plan (MP08\_0195) proposes a total floor space ratio (FSR) of 3.5:1. This is a significant increase from the density anticipated in the McGill Street Master Plan and the Draft Marrickville LEP 2010 which for the subject site proposes an FSR of 1.7:1.

The EA seeks to justify the increased density on the basis of providing a similar bulk and scale and that there will be negligible impacts to surrounding development. This approach fails to consider the impacts of the increased density both in terms of the intensity of development and an equitable distribution of development potential across the broader redevelopment area. The current proposal seeks to allocate a disproportionate amount of the available developable floor space onto the subject site. This has the potential to focus the great majority of the precinct's development potential onto a single ownership parcel at the expense of broader public benefit outcomes enshrined within the McGill Street Masterplan.

This consideration clearly indicates that the current proposal is an inequitable distribution of the precinct-wide development potential. As a further indication, the proposed FSRs for the McGill Street Precinct under the Draft Marrickville LEP 2010 generally range from 1.7:1 to 2.3:1 with one small site having a proposed FSR of 3:1. The subject site has a proposed FSR control under the Draft LEP of 1.7:1 compared to the 3.5:1 proposed in the Concept Plan. The preliminary Summer Hill Flour Mill Precinct Concept Plan now granted DGRs anticipates an FSR of between 1.4:1 and 1.5:1.

The proposed density is a sensitive balance between the capacity of the site, the scale of surrounding existing development and the capacity of the various transport infrastructure to service the resulting development. The McGill Street Precinct and the preliminary Summer Hill Flour Mill Precinct Concept Plan have been developed cognisant of these restrictions and have sought to ensure that development respects the development capacity of the land and provides an equitable distribution of the development potential across all of the land for all land holders while also delivering meaningful public benefit.

The proposed intensity and nature of the proposed development also has impacts upon the traffic management of the surrounding network that inhibit the development potential of the broader precinct. These impacts will be discussed in further detail in section 5.0 of this submission.

#### 5.0 Traffic impacts

The TMAP study lodged as part of the EA has been reviewed by ARUP, who were the traffic advisors engaged by Marrickville Council in the preparation and consideration of the McGill Street Precinct Masterplan. The ARUP assessment is provided at Attachment 2.

The ARUP review highlights a number of matters of concern in relation to traffic generation and the potential impacts to the surrounding network, and particularly the performance of the intersection of Longport Street and Old Canterbury Road intersection. The ARUP review has compared the traffic generating elements of the adopted McGill Street Masterplan with the traffic generating elements of the Concept Plan.





The ARUP assessment identifies that the Concept Plan proposes the provision of a total of 6,018.5m<sup>2</sup> of retail space compared to the adopted McGill Street Masterplan which anticipates a total of 2,942m<sup>2</sup> of retail space across the entire McGill Street precinct. The Concept Plan proposes the provision of 400 dwellings compared to a total of 500 dwellings across the entire McGill Street Precinct.

From a traffic generation perspective, the provision of a supermarket within the development leads to a significantly higher level of traffic generation and therefore pressure on the performance of the surrounding intersections.

The McGill Street Masterplan was specifically developed to disperse non-residential uses throughout the broader precinct to achieve positive urban design outcomes of street activation but also to better disperse the generated traffic. The Concept Plan totally conflicts with this outcome.

The ARUP assessment has also identified that the traffic modelling of the impact of the development on the Longport Street and Old Canterbury Road intersection has failed to include the impact of the current No Parking restrictions on Old Canterbury Road leading into the intersection. This omission means that the performance of this intersection is presented as being much worse than it actually is. One of the traffic management solutions from the traffic assessment for this intersection is to include Clearway restrictions. When Clearway restrictions are included in the modelling, the traffic assessment indicates that the level of service of the intersection actually improves. This is an inaccurate presentation of the facts and presents an operational improvement that cannot be delivered.

The ARUP assessment also indicates that the overall traffic consideration is deficient as no long term cumulative traffic impacts have been considered including potential adjoining development or how the suggested reconfiguration of the Toothill Street intersection could be implemented when land take from sites not controlled by the proponent would be required.

The overall conclusion is that the concentration of retail floor space is unacceptable in regards to traffic impacts and traffic dispersal and contrary to the underlying desire to provide diverse opportunities for street activation throughout the wider precinct.

## 6.0 Retail impacts

The Concept Plan proposes the inclusion of a full line supermarket and support retail with a total floor area to 6,305m<sup>2</sup>. The retail and commercial space proposed under the Concept Plan comprises:

- 2,800m<sup>2</sup> of supermarket floor space
- 3218.5m<sup>2</sup> of other retail floor space; and
- 287m<sup>2</sup> of commercial floor space.

The McGill Street Precinct Masterplan intended the development of minor service retail uses within total precinct to a total of 2,942m<sup>2</sup>. This level of retail space was to accommodate retail space for the day to day needs of future residents and occupants of office space and clientele drawn from a wider catchment and the future light rail service. This quantum of non-residential floor space is desired to be distributed throughout the precinct to assist in creating active street frontages and an attractive and vibrant mixed use precinct.

The proposed Concept Plan is supported by an Economic Impact Assessment of the supermarket which concludes that the locality is underserved by supermarket provision. The Economic Impact Assessment is however considered to be incomplete and has not accounted for or considered a number of retail offerings in the vicinity. This weakness in the assumptions drawn in the assessment also emphasises the failure of the assessment to recognise that the site of the





Concept Plan is located on the border between two subregions (South Subregion and Inner west Subregion). The assessment has considered the existence of the Marrickville and Marrickville Metro centres, but failed to acknowledge or consider the geographically closer centres of Leichardt Market Place and Norton Plaza and the supermarket offering also available in Haberfield.

Leichhardt Market Place in particular will be highly accessible from the McGill Street Precinct via the extended light rail and the Greenway cycleway. The retail offerings at this location include a Woolworths and Aldi Supermarket as well as a range of support specialty retail services including banking. The lack of acknowledgement of the existence of these facilities must undermine and raise questions over the veracity of the conclusions drawn. This omission also indicates a lack of understanding of the retail spending patterns of this locality which further undermines the conclusions and findings drawn, particularly in relation to the economic impacts upon the Summer Hill village retail centre. Even if it is determined that further supermarket offerings are warranted in the region, these still must be provided in locations that can be appropriately serviced and where their operation does not adversely impact upon the existing transport networks.

The consideration must also consider the capacity of the existing road network to service a full line supermarket and support retail in this location. The intersection of Longport Street and Old Canterbury Road is the most sensitive intersection to changes in traffic generation. The introduction of this level and volume of retail traffic as well as service and delivery vehicle traffic would be a poor outcome with the potential to cause a failure of this intersection without any solutions provided by the proponent. The approach to the development of the precinct as a whole must focus upon development forms and uses that minimise traffic generation so that the broader urban renewal opportunities of the broader precinct can be realised without adverse impacts upon the functioning and operation of the surrounding road network.

Again the adverse outcomes of the proposed Concept Plan can be attributed to the inequitable distribution and concentration of floor space and the inclusion of an excessive area of retail area to the disadvantage of all adjacent landowners, constraining future development and the realisation of quality urban renewal outcomes for this locality.

The site is not an appropriate location for the inclusion of a supermarket due to the constraints of the existing traffic network and the potential impact upon important intersections. As demonstrated at section 5.0, the proponent's traffic assessment overstates the potential improvement in the performance of the Longport Street and Old Canterbury Road intersection. The traffic assessment with the EA proposes measures to improve traffic performance which already exist in the form of no parking areas instead of the clearways suggested in the traffic report. Further the desirable outcome of distributing the non-residential space throughout the precinct to facilitate the activation of a range of street frontages and public domain areas is potentially undermined by the proposed concentration of a large allocation of retail space as proposed.

## 7.0 Site Amalgamation

The DGRs issued for the project and the covering letter specifically require the matter of amalgamation of the properties at the corner of Longport Street and Old Canterbury Road to be considered in detail. The detail provided on the attempts to negotiate with the adjoining property owners essentially entails a letter from an agent. There are many avenues to consider amalgamation options in addition to outright purchase, none of which seem to have been contemplated or considered.

While the proposed Concept Plan does not per se create an undersized allotment, useful guidance as to what entails reasonable attempts to amalgamate a site is contained in the Planning Principle contained in the decision of *Karavellas v Sutherland Shire Council [2004] NSWLEC 251*. This





decision relies upon the principles and methodology outlined in the decision in *Melissa Grech v Auburn Council [2004] NSWLEC 40*.

The evidence and effort documented in the EA submission does not include details of negotiations, structure of offers made or importantly provision of independent valuations to determine if any offers made were reasonable or unreasonable.

While amalgamation may not be critical to the overall outcome in this instance as there are more significant urban design concerns and intensity of development concerns with the proposal this matter has not been adequately addressed or considered by the proponent. It should be noted that the formulation of the McGill Street Precinct Masterplan considered the need for amalgamation in the southern areas of the precinct. Incentive for the amalgamation was the subject of consultation with the landowners and has resulted in the allocation of a slightly higher FSR offset by a requirement for the provision of an allocation of affordable housing. The proposed transfer of the public open space further to the south in the Concept Plan further reduces the development potential of the southern sections of the McGill Street Precinct and reduces the feasibility of amalgamation and the delivery of the desirable public domain outcome of the proposed central open space.

## 8.0 Conclusion

This declining light industrial precinct has the potential to become a vibrant and attractive mixed use precinct with significant community benefits in providing additional housing choice, pedestrian connectivity and employment and social opportunities for the existing and future residents. The implementation of the light rail extension will only reinforce these positive strategic attributes of the locality. These potential benefits must be considered in the broader context and the integration of any development into the locality. Our consideration of the Concept Plan for the Lewisham site identifies that many of the positive public domain outcomes enshrined within the McGill Street Precinct Masterplan adopted by Marrickville Council are lost along with the important linkages to the Summer Hill Flour Mill site and the integration with the light rail stop. The resulting public domain and public open space is a substantially inferior outcome that should not be approved.

These reduced public domain outcomes are further undermined by the intensity of the proposed retail uses and the overall intensity of development. The establishment of a supermarket at this location would be an unacceptable outcome that would have adverse economic impacts upon the Summer Hill village retail strip and significant adverse impacts upon the performance of the surrounding transport network, particularly the road network, that would also place at risk the ability to undertake an appropriate mixed use development of the broader precinct that would be able to take advantage of the significant investment in public transport infrastructure enshrined in the light rail extension. The scale and nature of the proposed development not only seeks to take an inequitable share of the potential floor space for the precinct but it includes an element in the form of a supermarket that has an unacceptably high traffic generation rate that jeopardises the functioning of the surrounding road network.

Development of the Lewisham site should be more closely aligned to the McGill Street Precinct Masterplan adopted by Marrickville Council and the provisions of the Draft Marrickville LEP 2010. This will ensure that important urban design principles and public domain improvements are able to be achieved and that a reasonable development potential is available to all land owners.



**SJB Planning**



**Attachment 2**

ARUP Review of 78-90 Old Canterbury Road, Lewisham – TMAP Study



### Comparison with Masterplan

The McGill Street Masterplan was assessed on the basis of 6 sub-precincts as shown in Figure 1. Precinct 4, most of Precinct 5 and the proposed green space generally correspond with the area covered by the proposed Concept Plan seeking the redevelopment of 78-90 Old Canterbury Road, Lewisham.

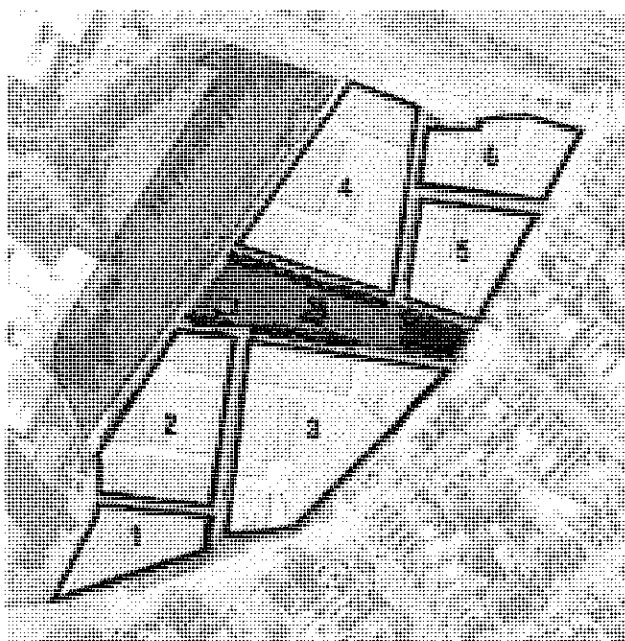


Figure 1 – McGill Street Masterplan Precincts

Table 1 shows the land use mix considered for these precincts when generating and assessing traffic impacts. The masterplan land use mix for precincts 4 and 5 can be compared with that proposed for the 78-90 Old Canterbury Road. The number of residential units has increased from 216 to 400, commercial has reduced from 1,257m<sup>2</sup> to 287m<sup>2</sup> and the retail has increased from 636m<sup>2</sup> to 6,018.5m<sup>2</sup>.

Table 1: McGill Street Masterplan Land Use Mix

Precinct	Residential Units	Commercial	Retail
1,2,3 and 6	284 units	5,152 m <sup>2</sup>	2,306m <sup>2</sup>
4 and 5	216 units	1,257 m <sup>2</sup>	636m <sup>2</sup>
Total	500 units	6,409 m <sup>2</sup>	2,942m <sup>2</sup>

Table 2: Proposed 78-90 Old Canterbury Road Land Use Mix

Precinct	Residential Units	Commercial	Retail
Equivalent 4 and 5	400 units	287 m <sup>2</sup>	6,018.5m <sup>2</sup>

The key issues resulting from the proposed mix are:





- Almost a doubling in the number of residential units. When precincts 1, 2, 3 and 6 are added, the future number of residential units across the whole McGill Street site would be 684. The traffic report goes further by predicting a total of 800 residential units may occur.
- The retail is significantly higher due to the supermarket. There was an expectation under the McGill Street Precinct Masterplan that 2,306m<sup>2</sup> of retail would occur on other parts of the precinct as part of the desirable street and site activation. With the level of retail proposed for Precincts 4 and 5 alone, it is likely to be difficult to provide further retail space throughout the wider McGill Street precinct in order to facilitate the desired street and public domain activation.

### Traffic Generation

The land use mix comparison described in Tables 1 and 2 results in the traffic generation described in Tables 3 and 4. For the proposed 78-90 Old Canterbury Road development mix, the morning peak traffic generation has increased from 79 veh/hour to 207 veh/hr (162% increase) and the afternoon peak has increased from 80 veh/hr to 475 veh/hr (493% increase).

Table 3: McGill Street Masterplan Traffic Generation (Source: Arup 2/11/09)

	Morning Peak (veh/hr)		Afternoon Peak (veh/hr)	
	In	Out	In	Out
1,2,3 and 6	50	100	101	107
4 and 5	16	63	56	37
Total	66	163	157	130

Table 4: Proposed 78-90 Old Canterbury Road Traffic Generation (Source: Traffix 9/10/10)

	Morning Peak (veh/hr)		Afternoon Peak (veh/hr)	
	In	Out	In	Out
Equivalent 4 and 5	71	136	285	190

The key issues resulting from the increased site traffic generation are:

- The proposed 78-90 Old Canterbury Road development contributes significantly more traffic to the road system than that assessed by the masterplan.
- Depending on the future land use mix across the entire McGill Street site, there will be significantly more traffic generated. If the anticipated Masterplan land use is added, then a total of 357 veh/hr in the morning peak and 683 veh/hr in the afternoon peak would result. The Traffix report considers an additional 400 units on the remainder of the site which would result in a total of 367 veh/hr in the morning peak and 635 veh/hr in the afternoon peak. These are significantly higher than the 229 veh/hr in the morning peak and 287 veh/hr in the afternoon peak predicted by the masterplan.

### Traffic Analysis - Interim Part 3A Traffic impacts

The critical intersection adjacent to the site is the Old Canterbury Road / Longport Street / Railway Terrace intersection. The Traffix report assesses the existing operation of this intersection as having a Level of Service F in both the morning and afternoon peak periods with a Degree of Saturation of 1.143 in the morning peak and 1.177 in the afternoon peak. The analysis assumes, however, that parking occurs on both sides of Old Canterbury Road between Railway Terrace and Toothill Street. There are existing peak period No Parking restrictions on Old Canterbury Road which increases the approach and departure capacities. The Arup analysis for very similar traffic volumes shows existing operations are better with a Level of Service of D in the morning and C in the afternoon and Degree of Saturation of 0.97 and 0.87 respectively.

The Traffix analysis for future conditions assumes a number of road improvements including Clearway restrictions along both sides of Old Canterbury Road. The existing No Parking





restrictions effectively provide the same outcome. The future operations are predicted as Level of Service D and Degree of Saturation 1.000 in both peak hours. The predicted level of improvement assumed in the Traffic assessment over the exhibiting performance of this intersection therefore does not exist.

A review of the future Part 3A traffic flows assigned to this intersection indicates only north south movements totalling 108 veh/hr in the morning and 115 veh/hr in the evening peak. These flows appear low given the strategic location of this intersection.

#### **Traffic Analysis - Long Term (cumulative) Traffic Impacts**

The long term traffic analysis is only undertaken for the future access point at the Toothill Street / Old Canterbury Road intersection. The critical Old Canterbury Road / Longport Street / Railway Terrace intersection is not assessed for development across the remainder of the McGill Street Precinct. The improvements to the Toothill Street intersection assume land take from adjacent sites to provide improved operations of this intersection. Additional road improvement works, such as construction of a left turn slip lane in Old Canterbury Road northbound for traffic turning west into Longport Street, are mentioned, but no analysis is undertaken. This improvement would also require land take on the adjacent site and no indication is provided on how this acquisition could be achieved.

#### **Cumulative Traffic Impacts of Adjacent Development Sites**

The cumulative impacts of the Summer Hill Flour Mill site to the west of the railway corridor have not been considered. The Transport Assessment prepared by Arup, 27 August 2010, anticipates peak hour vehicle movements of 289 veh/hr. A comparison between the masterplan for McGill Street and the increases resulting from the 78-90 Old Canterbury Road development proposal is provided in Table 5. There is a considerable increase proposed as a result of the higher density on the 78-90 Old Canterbury Road site and the significant increase in retail floor area proposed. Given the constrained nature of the road system immediately adjacent to these sites, an equitable spread of development should occur which has the potential to create a more dispersed spread of traffic.

Table 5: Afternoon Peak Traffic Comparison

Site	Component	Traffic Generation Afternoon Peak (veh/hr)	
		McGill Street Masterplan	78-90 Old Canterbury Road
McGill Street Site	78-90 Old Canterbury Road	93	475
	Remainder of site	208	160
Summer Hill Flour Mill Site		289	289
Total both sites		590	924