



Amy Watson - Re: Submission: MP 08_0195 - 79-80 Old Canterbury Road, Lewisham

From: [REDACTED]
To: Amy Watson <Amy.Watson@planning.nsw.gov.au>, <info@ashfield.nsw.gov.au>, <council@marrickville.nsw.gov.au>
Date: 24/11/2010 12:02 PM
Subject: Re: Submission: MP 08_0195 - 79-80 Old Canterbury Road, Lewisham

Dear Amy

I've used your link below and the only plans I can find are the original showing 15 floors. I believe it's now 9 floors? If so, can you treat this as a submission from me to say that I still think 9 floors is too high in such an old area and will be out-of-place in the inner west. I believe we should limit all developments to a maximum of 5 stories.

Other than that, I agree with the proposal. It can only improve a somewhat down-at-hill area. That said, a high-rise of over five stories would look just as bad as the current space, in a different way and would set an unwanted precedent for the inner west.

Sincerely

[REDACTED]
Summer Hill NSW 2130
[REDACTED]



Amy Watson wrote:

Dear [REDACTED]

Thank you for your email regarding the above project.

The exhibition period for the proposal commenced yesterday, Wednesday 17 November 2010 and closes on Friday 7 January 2011.

The plans that you viewed on the Department's website prior to Wednesday are the preliminary plans. The proposal has since been revised and the final plans feature

a reduced height and scale. The final plans are now available on the website http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=2923 for public view and comment. The plans may also be viewed at Marrickville Council offices and library, and at the Department of Planning Information Centre.

I hope this is of assistance.

Kind Regards
Amy

Amy Watson | Senior Planner | Metropolitan Projects | Major Projects Assessment | NSW Department of Planning
www.planning.nsw.gov.au
23 - 33 Bridge Street, NSW SYDNEY 2000 | GPO Box 39 SYDNEY NSW 2001 | Phone: (02) 9228 6379 | Fax: (02) 9228 6488
| Email: Amy.Watson@planning.nsw.gov.au



Please consider the environment before printing this e-mail

>>>

From: [REDACTED]
To: <amy.watson@planning.nsw.gov.au>
CC: <info@ashfield.nsw.gov.au>, <council@marrickville.nsw.gov.au>
Date: 16/11/2010 11:22 am
Subject: Submission: MP 08_0195 - 79-80 Old Canterbury Road, Lewisham

Dear Amy

I have just perused the plans for the above Lewisham development on the 'majorprojects.planning.nsw.gov.au' website.

Although I am in favour of the retail development and some residential, I am opposed to the proposed height of the development.

I live in [REDACTED] Summer Hill and do not wish to see my neighbourhood 'invaded' by inappropriate high-rise. The inner city is a very old area of Sydney with a lot of graceful and elegant old-style homes. High-rise does not fit with the area.

Approval of this number of floors (up to 15 from the plans) would be a sad and sorry precedent for the inner west to which I am opposed.

I would consider five stories at most to be suitable for this type of development anywhere in the inner west.

I hope the Council will request the owners/planners of the site to re-submit plans for the same development (ie. retail - supermarket, liquor store, fruit-vege store and other retail outlets) with no more than five stories above each retail outlet for residential accommodation.

I trust I am sending this email to the correct address. If not, please either: forward this email to the correct contact and copy me in the forwarded email, or, advise me of the correct contact.

Sincerely
[REDACTED]

Summer Hill NSW 2130

[REDACTED]

[REDACTED]

[REDACTED]

This message is intended for the addressee named and may contain confidential/privileged information. If you are not the intended recipient, please delete it and notify the sender.

Views expressed in this message are those of the individual sender, and are not necessarily the views of the Department.

You should scan any attached files for viruses.



[REDACTED]

Amy Watson - Submission: MP 08_0195 - 79-80 Old Canterbury Road, Lewisham

From: [REDACTED]
To: <amy.watson@planning.nsw.gov.au>
Date: 16/11/2010 11:22 AM
Subject: Submission: MP 08_0195 - 79-80 Old Canterbury Road, Lewisham
CC: <info@ashfield.nsw.gov.au>, <council@marrickville.nsw.gov.au>

Dear Amy

I have just perused the plans for the above Lewisham development on the 'majorprojects.planning.nsw.gov.au' website.

Although I am in favour of the retail development and some residential, I am opposed to the proposed height of the development.

I live in [REDACTED] Summer Hill and do not wish to see my neighbourhood 'invaded' by inappropriate high-rise. The inner city is a very old area of Sydney with a lot of graceful and elegant old-style homes. High-rise does not fit with the area.

Approval of this number of floors (up to 15 from the plans) would be a sad and sorry precedent for the inner west to which I am opposed.

I would consider five stories at most to be suitable for this type of development anywhere in the inner west.

I hope the Council will request the owners/planners of the site to re-submit plans for the same development (ie. retail - supermarket, liquor store, fruit-vege store and other retail outlets) with no more than five stories above each retail outlet for residential accommodation.

I trust I am sending this email to the correct address. If not, please either: forward this email to the correct contact and copy me in the forwarded email, or, advise me of the correct contact.

Sincerely

[REDACTED]
Summer Hill NSW 2130
[REDACTED]



[REDACTED]

**Amy Watson - Online Submission from Joseph Lewis (object)**

From: Joseph Lewis <jl555@mac.com>
To: Amy Watson <amy.watson@planning.nsw.gov.au>
Date: 23/11/2010 4:47 PM
Subject: Online Submission from Joseph Lewis (object)
CC: <assessments@planning.nsw.gov.au>

To whom it concerns,

I am writing to voice my objection to this development. I believe that the scale of the development is inappropriate in several ways.

1. The surrounding roads are already at capacity.
2. There is not enough green space in the development and public access is very limited.
3. It is being considered in isolation from the redevelopment of the Summer Hill Mills site.
4. The inclusion of retail space in the development will further exacerbate the traffic issues.

Thank you for your due consideration.

Yours sincerely,

Joseph Lewis

Name: Joseph Lewis

Address:
27 Herbert St
Summer Hill
NSW 2130

IP Address: 203-219-108-89.tpgi.com.au - 203.219.108.89

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

Powered by Internetix Affinity

12**Amy Watson - Application No: MP08_0195 at 78-90 Old Canterbury Road, Lewisham**

From: Joseph Lewis <josephlewis@me.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 21/12/2010 10:27 AM
Subject: Application No: MP08_0195 at 78-90 Old Canterbury Road, Lewisham

Attention: Director, Metropolitan Projects

Dear Sir/Madam

I am writing to express my concerns regarding the above Concept Plan which is currently on exhibition as part of its Environmental Assessment, namely:

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.
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.
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. 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.
5. 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.
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.
7. There has been little genuine engagement and consultation with the local communities or local councils.

As a result, I call 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,
Joseph Lewis
27 Herbert Street
Summer Hill
NSW 2130

Director
Major Project Assessment
Department of Planning

8 Deakle St
Summer Hill
2130
1 December 2011

Re Application No MP08-0195
78-90 Old Canterbury Rd Leichhardt

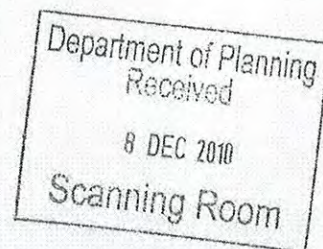
I refer to the above Concept Plan and object for the following reasons -

- 1) The number of residential buildings proposed with their height ranging up to nine storeys and containing some 600 apartments is a gross over-development of this site
- 2) The proposed retail / commercial floorpace is excessive.
- 3) The provision of public open spaces is grossly inadequate.
- 4) The adjoining and nearby main roads are already over used. Long term traffic measures have not been thought through.
- 5) This concept plan should only be considered in conjunction with the development plan of Craigmore Hills adjoining.

In its current form Concept Plan MP08-0195 is rejected

Yours faithfully
Margery Wallin

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



Application No: MPO8-0195 78-90 Old Canterbury Rd, Lewisham, Concept Plan

I call upon the Department of Planning to reject the concept plan, now on public exhibition, for the following reasons:

- This development will have profound impact on traffic flows on roads in the immediate area which are already gridlocked at peak times and beyond. Such impacts will only worsen congestion along Parramatta Rd, Old Canterbury Rd, Barker, Cook, Longport, West and Toothill streets. All these carry heavy vehicles, and public buses and so will impact adversely on freight and public transport.
- The plans call for traffic to empty directly into the already congested intersection of Old Canterbury Rd and Longport St which is currently rated the lowest for its operating performance. Surrounding streets are at capacity and cannot bear any additional traffic movements.
Moreover, the developer of The Lewisham Towers precinct has been entirely deceitful in formulating parking allocations and traffic impacts, underlining the benefits of light rail to support his development without ever acknowledging the many prospective light rail commuters who will be drawn to the precinct and will need to enter the site. He grossly overstates the popularity of car pooling schemes which remains of marginal benefit.
- This development flouts the controls of Marrickville Council's DCP and the RTA's own parking guidelines providing 90 fewer parking spaces than is required.
- The development's aim is to place 400 flats in four to five nine storey towers, a gross overdevelopment of the site. The object, to stack as many people in as little space as possible to maximise real estate profits, means there is no usable green space for the community, let alone the families who will be sold such units. All that has been provided is a walkway to the light rail station.
- Instead of parkland, the community is offered a supermarket, which is exactly what the area doesn't need. There are four supermarkets within a 20 minute walk of this site, in Summer Hill, Dulwich Hill, Leichhardt and Petersham. These businesses don't need extra competition nor the traffic gridlock which will worsen trading conditions for these operators.

The developer needs to be asked to redesign his development so that it reflects the needs of the community and builds on the strengths of the site, not compound its weaknesses in order to strengthen profit returns. Once approval is granted, this developer intends walking out and on- selling his approvals to the highest bidder, pocketing a lovely commission while leaving my small community, which already bears the pain of aircraft noise, with failing businesses and a failed road system.

PER
Steven Siewert
51 Kensington Rd,
Summer Hill

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

Application No: MPO8-0195 78-90 Old Canterbury Rd, Lewisham, Concept Plan

As a long term resident of the small village of Summer Hill, I wish to object to the above concept plan, currently on public exhibition, for the following reasons:

Providing for 400 flats in towers nine storeys high, this redevelopment represents a GROSS overdevelopment of the site. Together with the redevelopment of the neighbouring Summer Hill mills precinct (300 flats and towers of up to 14 storeys high) the development's apartment blocks will overshadow the small neighbourhood centres that are Lewisham and Summer Hill, instantly creating a new suburb within our boundaries with no respect for local character, traffic impacts and community amenity.

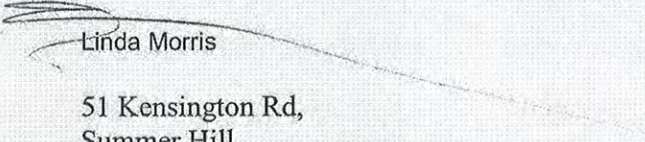
The development offers no usable public spaces. This is a development designed to maximise profits and offers the community, which has insufficient public parkland, no on-site open space. What little the developer has provided is a boulevard, which is no more than a thoroughfare to the light rail station. This greedy developer wants the green space needs of his residents met on land that he doesn't own.

The traffic impacts of this redevelopment have been deliberately understated, its traffic projections relying on assumptions that residents and even light rail users will not use cars, a fallacy in today's modern car dependent society.

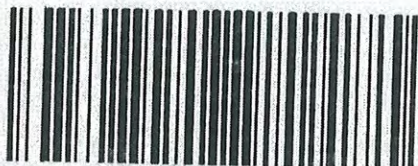
As a resident of North Summer Hill, I know only too well how difficult it is to drive to Summer Hill in peaks at the moment. Railway Terrace is already at capacity, without more cars emptying onto it as its crucial intersection with Old Canterbury Rd. Approve the development, and you will approve a "car park".

Never have I seen a redevelopment which scorns the residents, makes a mockery of public consultation - they never listened, not once - seeks to suppress public interest at the expense of their own profit making objectives and aims to dupe planning authorities with dubious assumptions underlying traffic projections. At every turn, the developer has been seeking to make someone else pay for the green space, the traffic impacts and the height controls.

Please don't let the community pay for the developer's profits.

Linda Morris

51 Kensington Rd,
Summer Hill



PCU017813

Richard Guyot

20 Henry Street

LEWISHAM 2049

12 December 2010

Major Projects Assessment

Department of Planning

GPO Box 39

SYDNEY NSW 2001

Dear Sirs

Environmental Assessment for Concept Plan for a mixed use development at 79 – 80 Old Canterbury Road Lewisham (MP 08 0195)

Thank you for the opportunity to comment on the above concept plan which relates to an area across the road from my house.

While the concept plan has much to commend it, it provides no solution to the parking needs which will result from such development. In addition, its proposals for traffic changes on adjoining streets seem designed to aggravate an already difficult situation.

First parking. There is no clear statement on the number of parking spaces required for the proposed number of residents and their visitors let alone where this parking will take place. There is no provision for the parking needs of people wishing to use the proposed retail and other business facilities. A pious hope is expressed that more people today will ride bicycles or walk but this is hardly realistic planning.

As this is presumably a private development, management of parking – and also maintenance of the area – will not be administered by Marrickville Council but will be dependent on the various owners of the property. As attractive as this proposal may be, any default will simply place added pressure on surrounding streets. Parking on these streets is already constrained as evidenced by the need of Council to impose resident only parking provisions.

Second traffic. The proposed changes to Old Canterbury Road may look good on paper but bear little relation to actual use of this and related road systems and driver behavior particularly at peak traffic times. While the proposal tries to aid egress from the site from only two or three points, it ignores convenient access to the site for drivers particularly those coming from the city or Parramatta Road.

Given the status of Old Canterbury Road, I would assume the RTA would need to be involved in these proposed changes from the outset.

As mentioned earlier, this proposal has many things to commend it but simply evading the crucial operational needs of a development of this scale is likely to impose unnecessary hardship on the surrounding community. If this scale of residential and business development goes ahead without adequate provision for its proper operation and for necessary services, it will quickly deteriorate into a low rent slum with all the sleaze that entails.

This is too good a site for residential development for it to be spoilt by a second rate plan.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Richard Guyot', with a stylized, flowing script.

Richard Guyot

Phil Pick

From: Sharon Armstrong
Sent: Tuesday, 30 November 2010 4:40 PM
To: Phil Pick
Subject: FW: Lewisham Towers . Proposed Development

From: William George Nicholls [mailto:billnicholls@bigpond.com]
Sent: Monday, 29 November 2010 7:10 PM
To: Sharon Armstrong
Subject: Lewisham Towers . Proposed Development

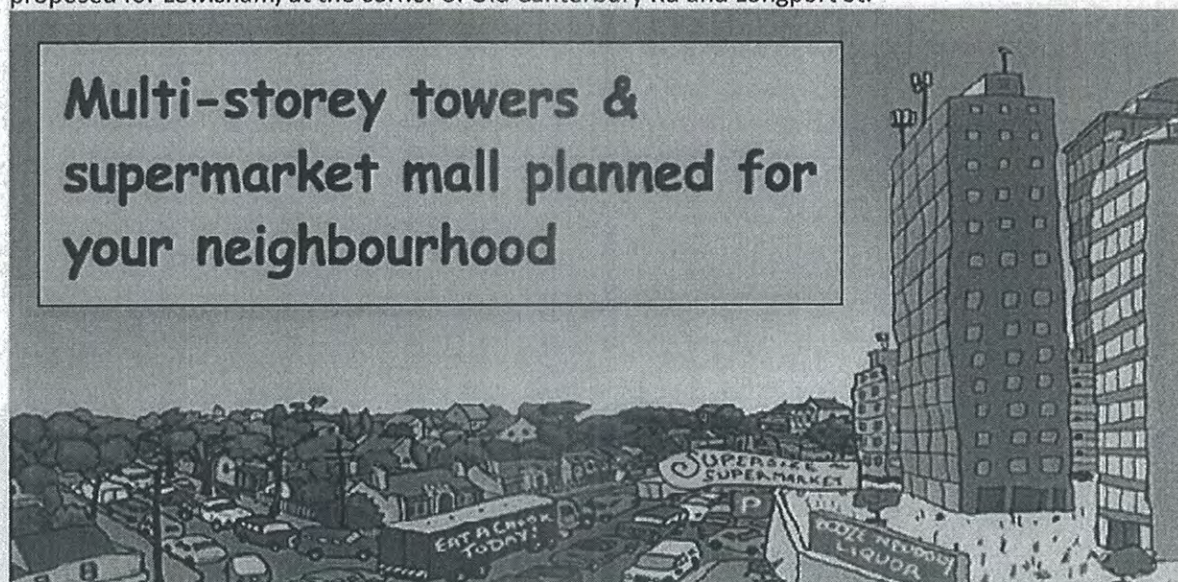
To Hon Tony Kelly,

As a rate payer and concerned citizen. I am opposed to the proposed new development at the corner of Longport St and Old Canterbury Rd in Lewisham.

Please refer to the following:

Posted in [Lewisham](#) on May 20th, 2009 by Max Phillips -- Comments Off

Would you like to live next door to multi storey tower blocks? A huge overdevelopment has been proposed for Lewisham, at the corner of Old Canterbury Rd and Longport St.



View [Lewisham Part 3A development map](#) in a larger map

The development includes 9,6 and 4 storey towers and a large supermarket mall with basement car parking. Would you like to live next door to nine storey tower blocks?

The developer has bypassed council and the local community and gone straight to the state government for approval under the controversial Part 3A law.

It will cause

- Overdevelopment
- Traffic congestion and pollution
- Community disruption

- New precedents for building size for the Inner West
- Local shopping strips hurt – Petersham, Dulwich Hill, Summer Hill
- Interferes with the Cooks River to Iron Cove Greenway project

Please note my objection as stated above.

Yours sincerely,
Bill Nicholls

Grace Cochrane
curator.writer.consultant
MFA, PhD (Tas) D.Litt (UNSW)
25 Morris Street, Summer Hill,
NSW 2130, Australia
61 (0)2 97986821
61 (0)4 25215244
gracecochrane@bigpond.com

6 December, 2010

The Hon Tony Kelly
Minister for Planning,

Dear Minister,

Development proposal, Lewisham: Application no: MP08_0195

Purpose:

I want to register my very strong concerns about the inappropriate scale and concept of the development proposal for 78-90 Old Canterbury Road, Lewisham, Sydney, and to add my voice to the many demands for a review of the proposal.

Recommendation:

To reject the application as it is and, in reviewing it, demand a more responsible scale of development that would take into account the actual needs and characteristics of the area, as well as the issues identified below, which are shared by residents of the area and the Marrickville and Ashfield Councils.

Issues:

I have lived in Summer Hill for 22 years, and understand the patterns of living in the area, including patterns of transport and shopping. I also understand, and strongly support, the small business infrastructure that exists here, and want to maintain its viability.

I support the work of both Ashfield and Marrickville Councils, in their careful planning for residential and business development across their entire region of responsibility. It is my experience that their plans are drawn up to take into account the needs of the area, based on their knowledge of their communities.

In the plans currently presented by the developers, I see little regard for local knowledge of needs, opportunities and constraints, but rather a greedy opportunity for making money, by-pass local planning processes, using the facility provided by the Government's 3A planning legislation.

Despite a reduction in the height of some towers, the proposal still appears to be an example of exploitation of the Government's policy for strip-development along transport corridors, whether appropriate to the area or not.

Specifically, these are the points that must be considered:

Residential density:

There are far too many people to be housed on a site this size, and in this location. It is known that a second development is also taking place on the adjacent Mills site, and if the Department of Planning is serious about looking at the full context in which proposals are assessed, it is clear that the two need to be considered together.

It is noticeable that the Lewisham proposal is vastly more densely populated than the Mill proposal.

Retail density: there is a gross over-allocation of space to retail businesses, especially the huge and inappropriate supermarket (2800 sq.m!). The area (even with the influx of new people) is already well catered-for with supermarkets and small businesses, and the scale of this facility is unnecessary.

Employment:

If one of the reasons for retail development on this site is to provide employment, it is equally, if not more important, to sustain the viability of those existing businesses in nearby shopping precincts such as Summer Hill. This issue has been expressed as a priority by residents in the area.

Traffic:

While the site is close to the railway line, and to some bus routes, there is absolutely no doubt that there will also be an increase in the number of cars on roads and intersections that are already identified as inadequate for current traffic. This is already a significant problem for the area, with frequent gridlocks for long distances, and it can only be worse. The traffic report is not convincing; this aspect needs to be reviewed more objectively.

Parking:

The parking under the building for residents is described as 'limited'. Thus, those with more than one car will park in narrow adjacent streets, already congested with cars of existing residents, and with rail commuters. If, as well, there is inadequate parking for shoppers on the precinct, their cars will also congest those streets – or they will not come there (so why so many shops?).

Light rail:

This is not likely to make a significant difference. Not everyone works along that route; it will have the same destination as city-bound trains (and currently costs more). And not everyone works in, or needs to travel to, the city!

Open space:

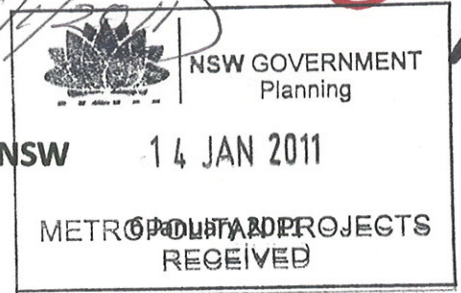
The amount of open space allocated is pitiful in the extreme. What a wasted opportunity. But then open space doesn't bring an investment return to a developer, does it?

Yours sincerely,



Grace Cochrane

(Signed copy - original emailed 6/1/2011) **19** 13/1/11 **AW** **AS**



NO LEWISHAM TOWERS INC. PO BOX 487 PETERSHAM NSW

14 JAN 2011

Attention: Director, Metropolitan Planning

Major Projects Assessment

Department of Planning

GPO Box 39

SYDNEY NSW 2001

VK
Email: plan_comment@planning.nsw.gov.au

Dear Sir/Madam,

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

No Lewisham Towers (NLT) Incorporated objects to the above Concept Plan, for which an Environmental Assessment is currently on exhibition, for the reasons outlined in the submission below.

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

Despite statements to the contrary in the (overall) Environmental Assessment Report (prepared by Planning Ingenuity) and comments on various built form, height and block plans prepared 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 precinct beyond his site) which is totally incompatible with those of the immediate and surrounding locality, with the exception of the iconic Mungo Scott flour mill (Allied Mills) which dominates the skyline and should be allowed to continue to do so, without competition.

The massing combined with the overall scaling-up of heights dominates the locality and views to landmarks such as St Andrews church spire at Summer Hill and the elevated rail line from the south. The usability of the public and private open spaces is compromised, with overshadowing of these areas (and lower floors of the residential buildings themselves) for most periods of the day in any season. The eastern side of the Greenway corridor would be deprived of morning sun, while the narrow 'green boulevard' parallel to Hudson Street, a suggested focal pedestrian space, would also be overshadowed.

The Visual Impact Assessment done by Richard Lamb correctly identifies the context of the locality as constituting single and 2-storey attached and detached dwellings of late 19th/early 20th century styles and vintage. Despite a conclusion of 'moderate' impact, the recommendations given at Section 4.0 of the Report indicate that improvements are necessary -

increased setbacks of buildings and lowering of their height, in particular in relation to open space areas and access to sunlight, and a reduction in street height for buildings at Old Canterbury Road with greater setbacks for taller buildings. This is an acknowledgement that certain buildings are too high and/or insufficiently separated.

An approval of a Concept Plan will carry forward to the development stage such matters as building envelopes and massings (including height and the arrangement of buildings on the site), walkways, public and private open space provisions and general access arrangements. This Concept Plan will not lead to a quality outcome for this site and it will be prejudicial to the redevelopment of the balance of this precinct. It is not a plan for good amenity for future residents and users of the site, nor a model of the current or desired future character for the locality.

2. Public and Private Open Space

The 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 (Planning Ingenuity report p.28). However the plans submitted do not show how or where this quantum is achieved. If it is **on the applicant's site** it comprises 50% of the site area, which is a nonsense.

It can only be assumed that this figure is a total for all public areas depicted on Master Plan 8.2, which plan includes the ENTIRE McGill Street Master Plan precinct, an area of industrial land fronting Old Canterbury Road (which is within Ashfield LGA), the Greenway and an area west of the rail corridor (which forms part of the Allied Mills site).

Focusing on the applicant's site shows -

- a) The 'central park' of the landscape master plan (prepared by Site Landscapes) falls in the main outside the site, on land which is not owned or controlled by the applicant. In reality a tree-lined street ('green boulevard'), of total area 900m² only, is to be provided. The street is to run parallel to and north of Hudson St and is presumably necessary to achieve traffic circulation to/from the loading dock and carparking associated with the supermarket and retail shops proposed (given the narrow 5m kerb to kerb width of Hudson St).
- b) There are inconsistencies between the landscape master plan and Land Use Diagram (12.4) and Master Plan Option 3 (8.2) as to what is public open space and what are proposed as private open space areas (courtyards etc) or indeed are only the minimal separations between buildings or their access walkways.

Given the supermarket/retail centre is located below much of Park 1, at best a paved plaza and forecourt with some grassed areas, planter boxes and children's playground/exercise area will result for this North/South public park, all flanked by pedestrian thoroughfares and buildings as little as 10m apart (Plan 8.8).

Area 4 in this plan is noted as 'private open space' and being north of William Street, is outside the site. All other areas are shown as private but also include the accessways (from William & Brown Sts and Old Canterbury Rd) to the buildings they separate; there is likely to be high pedestrian movement along these accessways. The southern extension of Brown Street is clearly a public thoroughfare.

- c) The 'greenway corridor frontage' in the landscape master plan is mainly beyond the site boundary; it is located on and west of the rail corridor and includes sections of the Allied Mills site – none of this land is under the applicant's control. This western site boundary is shown in Plans 8.2 and 8.3 as a new north/south street lined by trees.

The depictions of 'central park' and 'greenway corridor frontage', being mainly beyond the applicant's site and control, are misleading representations of the quantum and extent of public open space which is able to be delivered by the applicant. Elsewhere in the submitted plans there inconsistencies and misrepresentations of what can be considered as open space, public or private. This is a further demonstration of the overall confusion in documentation, which in total presents an unclear and ambiguous depiction of what the Concept Plan is proposing.

The standard for public open space provision is 2.83 hectares per 1,000 people. Obviously this standard applied to this site of 13,115 m² is unachievable (400 units = 1,000 persons = 2.83 hectares). However an applicant should provide for the open space needs of his future population at (at least) the existing ratio of open space in the Council area – for Marrickville this is 16.1m² per person which on this site (for 1000 persons) is again unachievable (at 16,100m²).

The applicant considers providing the 3,140m² of public open space proposed in the Council's McGill St Master Plan from within his site alone is 'inequitable' and an 'unfair burden'. It is the applicant however who wishes to house 1000 new residents 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. It is inequitable and unfair to transfer most of this applicant's responsibility for open space to future developers of other sites, to be met in addition to what those sites will require.

The inability to demonstrate what is clearly open space (public or private) of value or utility to future residents and users of the site combined with an objection to dedication of 3.14m² per person necessary for the area shown in the Council's masterplan is a further indication that the residential density proposed for the site is excessive and that the objective is to maximize building bulk and site cover, height and floor space to the exclusion of other planning and quality of life considerations.

3. Supermarket and Retail/Commercial Uses

There are a number of methodological shortcomings with the Economic Impact Assessment conducted by Don Fox Planning.

No justification is given for the choice of Ashfield Town Centre as a reference population for the proposal and the statements as to likely characteristics including similar median income, high rental levels, age structure, % overseas born, are unsupported. It seems that Ashfield Town Centre has been chosen because it has high residential density and shopping facilities at a train station. Local knowledge and observation of the existing Lewisham/Summer Hill/Dulwich Hill locality would be more likely to choose a reference population(s) (if such is required) as the existing population in 3 storey flats and workers cottages and the occupants of redevelopments such as Waratah Mills at Dulwich Hill, Newtown Silos and Trio at Camperdown.

The definition of Primary and Secondary Trade Area (PTA, STA) boundaries is questionable. No reason is given for the bounding of the PTA by the nearby western rail line and by Old Canterbury Road, which extends under this rail line to North Lewisham. The STA is similarly bounded by the rail line to exclude the eastern section of North Summer Hill, which has ready access to Longport Street/Brown Street via Grosvenor St under the rail line. Both these areas are predominantly residential .

An assessment of likely sales and turnover including the likely use of a supermarket or shops by residents of the development itself, is not an indication of DEMAND for such facilities. Indeed the overwhelming response from those who participated in the Urbis consultation (as noted in that Report) is that certainly a supermarket is not needed (nor is it wanted). There is no evidence to support the claims that 'most supermarkets (nearby)...are currently overtrading due to a shortage of competition' or that the locality is 'undersupplied' in supermarkets or that a new supermarket will provide competition and lead to reduced prices generally. There are no industry turnover sales figures provided and no evidence has been provided by industry analysts. Nor is any expression of interest from any likely supermarket operators (such as Woolworths or Coles) presented.

The report at section 6.2.1 seems to infer however that a supermarket at this site will rely for its success on trade coming from residents beyond those living on the site or nearby. However the supermarket needs of the wider locality would seem to be already met by the existing provisions, with four (4) supermarkets within 1.5 kilometres of the site and others at Ashfield Mall (Woolworths, Coles, Franklins), Haberfield (IGA) and Norton Street (Norton Plaza) Leichhardt, all within 2.5 kilometres. The question is – why would they come to a supermarket at this site?

The report gives cursory attention to Leichhardt Marketplace (which contains a full-sized Woolworths supermarket, an Aldi supermarket and numerous speciality shops) in Marion St

and only in passing to the Norton St/Parramatta Rd Leichhardt shopping strip. Marketplace is 14 minutes walking distance/2.5 minutes driving distance from the subject site and is known to be the centre utilised by many Lewisham and Summer Hill residents (when not using Summer Hill shops/Franklins), in preference to Ashfield Mall and town centre (6.5 minute drive) or Marrickville Metro (10 minute drive). This was raised with the writer of the report at the Urbis Petersham RSL consultation day (17/7/10). The Part 3A application for Marrickville Metro (which is currently of similar size to Leichhardt Marketplace) seeks to create a higher-order shopping centre – its existing supermarkets (2) and specialty shops are not competitors for trade from localities near the subject site.

The shopping centres of Summer Hill and Dulwich Hill are 10 minutes walk (900 metres) and 15 minutes walk (1.4 km) from the site respectively. These are comfortable walking distances – the site is located between the train stations at Lewisham and Summer Hill and Dulwich Hill has commuter bus connections to the City. Each has a supermarket – Franklins at Summer Hill (which has a 2007 DA approval to redevelop and expand to provide 1525m² of supermarket and 1500m² of other retail, with a new F&V already constructed and operating) and IGA at Dulwich Hill.

The report states that suitably sized opportunities for further retail including supermarkets exist in Petersham and Dulwich Hill where numerous sites are underutilised. Given that a Woolworths variety store closed in Dulwich Hill in the early 90s as did a small Jewel supermarket in Petersham, the better conclusion is that the 1993 finding of Plant Location International (report p.2) ie: that there is little demand for additional retail floorspace in the Marrickville LGA, remains the case today.

The Concept Plan proposes a sizeable supermarket (2800m²) with additional retail (3218m²) and commercial (287m²) floor space – 6305m² in total, a significant new centre for this locality. A conclusion that the amount of expenditure from PTA/STA households to retail on this site will not be likely to impact on the role and function of other retail centres (as their trade would still come from other households that are beyond the trade areas of this centre) says no more than shoppers will go to whatever centre meets their needs – it does not address the issue of impact on those centres. The implication is that these established centres all have adequate catchments and are all functioning well and therefore will not be affected by (modest) escape expenditure to this site. The number of vacant and underutilised shops and commercial premises in Lewisham, Petersham and Dulwich Hill indicate otherwise.

In Lewisham's case these 20 plus shops/former shops (now residences) **are on a direct route to the site from Lewisham Station, a 3.5 minute walk away.** Ten (10) of these properties are in retail/commercial use and include a mixed business near the station and a convenience store at the corner of Henry/Victoria St (which is only 2 minutes walk from the site!). The Marrickville Village Centres Urban Design Study (3/09) proposes major upgrading

of the streetscape of Victoria Street and the extension of the neighbourhood business zoning in the DLEP 2010 (now on exhibition) to include ALL these 20 plus properties will provide scope for re-instatement of retail/commercial floorspace. The convenience store has space to expand as does the mixed business, while the site of the former shops on the eastern corner of Railway Terrace and Victoria St has sufficient site area to accommodate a supermarket (if one was demanded). This neighbourhood centre should be supported, not a new local centre created on this Part 3A site.

4. Traffic, Parking and Servicing

The Transport Management & Accessibility study conducted by Traffix **DOES NOT** canvass car parking or loading dock arrangements nor give details of service vehicle movements (including their type and arrival/departure times) for the supermarket/retail components of the Part 3A application, despite these issues being specified in the DGRs.

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 (!) and ensuring that the development is mainly residential, with the supermarket/retail offering being of the 'local' variety to serve the residents of the site and the immediate area (who will walk there). Reliance is placed on the proximity of Lewisham station and the 413 bus which passes the site. There are assumptions made (p18) about likely parking demands which are based on the likelihood of users walking to and from these shops.

The purposeful 'moderate' provision of car parking is based on a range of assumptions stated in the report. The report at p12 notes that the intention is to provide overall on-site parking at reduced rates, to promote non-car use, however defers consideration of what might be the necessary means to achieve this (car-sharing, improved bus services, taxi use and pedestrian/bicycle linkages) to future (DA) stages (despite the DGRs). A cynical reading of the report could conclude that it is an acknowledgement that the **actual** parking demands of the floor space and uses proposed cannot be met without gridlocking the adjacent roads and streets.

The allocation proposed is 1 car space for each residential unit (400) despite the acknowledgement (p33) that it is likely that some 71% of these units will be 2 bed (and 9% 3 bed); Planning Ingenuity notes at p33 that a variety of studio, 1,2 and 3 bedroom units are proposed. It is obvious that at the DA stage (if not the occupation stage) there will be a demand for more car spaces. Visitor parking is proposed at 100 spaces with 9 spaces for commercial uses (?? -see above), 92 for retail and 80 for the supermarket – this totals 681 (p19), while the grand total given on p12 is 669!

The report does note (p17) however that supermarkets (being largely car-dependent) need to provide sufficient parking. Given the inference of section 6.2.1 of the Don Fox Planning report (referred to above) that a successful supermarket will require trade from beyond the site and the immediate locality, with the site directly adjoining a main road system (which has significant traffic volumes of commuter traffic) the convenience factor would presumably prompt a visit by those travelling to or from work or school dropoff/pickup – providing insufficient parking would certainly negate any return visit.

Table 1 notes that specified intersections are operating near capacity (D) or at an unsatisfactory level (F). In considering what opportunities exist to improve these intersections various suggestions are made (Figure 5), with comments given:

- a) Brown St left in/left out , with a deceleration lane in Longport St – this is the existing de-facto arrangement; a marked deceleration lane would remove kerbside parking (up to 7 spaces) used by the Longport St concrete column factory (which is not part of this Part 3A application)
- b) Dedicated LHT lane from Longport to Old Canterbury Rd – the report states that the existing lane is not necessary for east-bound traffic but such traffic is the predominant user of this lane, merging to enter Railway Terrace. In fact, this LH lane extends in a de-facto fashion beyond the Longport rail bridge to the west, to relieve bumper-to-bumper am peak congestion west past the round-a-bout in each of the Summer Hill feeder roads (Smith, Carlton and Grosvenor). A dedicated LHT lane will only exacerbate this congestion.
- c) Clearway restrictions on Old Canterbury Road – this exists at present.
- d) Removal of on-street parking in Railway Terrace, west of West St bridge lights – many of the residences here have no on-site parking and 5 kerbside parking spaces would be removed.
- e) Restrict the 2-lane capacity of Old Canterbury Rd on the approach to Longport/Railway Terrace - current merging from these 2 lanes occurs at the rail bridge with little difficulty or delay. Introducing a single lane approach will add to congestion and delay to the south and frustrate the motorist seeking to turn left into Longport (prompting a rat-run via William/Brown Streets).

The report notes (p26) that the introduction of traffic signals at the (new) Hudson St/Old Canterbury Road intersection is NOT an option, given the proximity of other intersections. This would have had major traffic implications for Henry and Victoria Streets. However traffic signals at this intersection was suggested by the applicant's representatives at the Urbis consultation day and IS SHOWN in Traffic Master Plan 8.3, as is a road widening at the corner of Old Canterbury Road and Longport St (beyond the applicant's site).

While Table 3 (p28) is presented, the report does not show how the above intersection changes will actually bring about a transformation of 'F' intersections to C, B or indeed D.

The suggested long-term traffic arrangements involve lands/development options/road systems which are beyond the applicant's control and are therefore not usefully considered.

The report is silent on the (likely cumulative) impact of the Part 3A (lodged August 2010) Allied Mills Concept Plan at Summer Hill 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. It is a key deficiency of this report and the Environmental Assessment for this site generally that this cumulative assessment has not been done.

5. Community Consultation

The positive comments about this Concept Plan listed in the Urbis Community Consultation report (at page ii) are not about features of the Plan per se but about the need to revitalise this redundant site and bring housing, greenery and open areas which will improve the locality and support transport and pedestrian linkages.

The report correctly notes the community is seeking such things as more open space areas, sufficient parking, 'a variety of building forms - not a single estate uniformity', integration into the streetscape and character of Lewisham and Summer Hill and a traffic management plan/attempts to mitigate traffic congestion. The report then lists numerous concerns raised by the community about the Concept Plan itself including - height and scale proposed, traffic management and parking, provision of open space (public and private), overshadowing, no need for a supermarket/shops (sufficient exists in area already). These concerns also include the limited nature of the consultation process, inconsistencies between plans exhibited, the objectivity of material displayed and assumptions made in the plans about changes on lands beyond the applicant's site or control

Such comments and many others (both positive and negative) have also been made at the well-attended public meetings held by NLT on 20th May, 19th November (2009), 16th July and 4th December (2010), on NLT's website, in 500 letters delivered to the State Member for Marrickville and in petitions collected at community festivals in Marrickville and Summer Hill over the last 18 months. A Community Referendum on the day of the last Federal elections yielded a petition of 1500 signatures seeking the scaling down of the concept so that what is finally developed is 'sustainable in terms of traffic, transport, open space and local amenities'. These petitions have been submitted to state and local government representatives.

At the last NLT public meeting held on Saturday 4th December 2010 the following resolution was carried unanimously:

"That this public meeting states its opposition to the Lewisham Towers proposal and calls on all parties in the coming state election to commit to repealing Part 3A of the EPA Act and return planning powers to Marrickville and Ashfield Councils. And as a short term measure, we call on the government to declare these sites NOT state significant, and thus allow the councils to be the determining authority".

No Lewisham Towers Incorporated (NLT), on behalf of its members and the hundreds of local residents, business owners and other concerned citizens who have attended meetings, written letters and signed petitions, request that Concept Plan Application No. MP08_0195 78-90 OLD CANTERBURY ROAD, LEWISHAM be **refused**.

The applicant asserts that his Concept Plan is compatible with Marrickville Council's adopted and exhibited McGill Street Master Plan – it is not. The approval of this Part 3A concept plan would lead to a scale and density of residential development which is excessive, poorly planned, adjoining congested main roads and containing unwarranted retail facilities (all with restricted parking), which is not in the interest of (or conducive to) the amenity of future occupiers and users, or that of the surrounding neighbourhood.

Yours Faithfully

A handwritten signature in cursive script, appearing to read 'Tamara Winikoff', followed by a smaller signature or initials.

Tamara Winikoff

On Behalf of the Committee, No Lewisham Towers Incorporated

A: 38 Victoria Street
Lewisham, NSW 2049
P: 0411 162 156
E: t.winikoff@visualarts.net.au

The Hon. Carmel Tebbutt MP
Member for Marrickville
244 Illawarra Road
MARRICKVILLE NSW 2204

30th November, 2010

Dear Minister Tebbutt

Re: Part 3A application, MP 08_0195 - Mixed Use Development, proposed for the site on the corner of Longport Street and Old Canterbury Road, Lewisham.

Thank you for your letter sent on 27th October 2010, in response to previous correspondence from the No Lewisham Towers Inc Committee.

In your letter you refer to your success in securing an extension of time for community consultation and your agreement that it would be disadvantageous for the Environmental Assessment for the above development proposal to be put on public exhibition during the Christmas New Year holiday period.

However, as we feared, this is exactly what has happened, rendering valueless the 15 day extension of time you advocated for on our behalf.

Not only does this de facto restrict the consultation period back to the original time for community response, but it also contracts the amount of work time which can be devoted to the independent traffic study which is anticipated to reveal the real impact of greatly intensified traffic on the surrounding streets of both the above proposal and the Allied Mills site immediately adjacent to it across the railway line.

With great urgency, we ask you once again to seek an extension of the consultation period to 60 days to allow for a genuinely democratic consultative process.

You are also invited to address the community at a public meeting to be held at St Andrew's Church Hall (cnr Smith and Henson streets, Summer Hill) from 4pm to 6.00pm on Saturday 4th December to present your position. We hope you feel this matter is sufficiently important to accept this invitation.

Yours sincerely



Tamara Winikoff
On behalf of the Committee, No Lewisham Towers Incorporated

Cc: The Hon. Tony Kelly MLC, NSW Planning Minister

The Hon Linda Burney MP, Minister for the State Plan and Community Services and member for Canterbury

The Hon Virginia Judge MP, Minister for Fair Trading and the Arts and member for Strathfield

The Hon Brad Hazzard, NSW Shadow Planning Minister

Ms Fiona Byrne, Australian Greens



**Amy Watson - Application No:MP08_0195 78-90 Old Canterbury Rd.
Lewisham .ConceptPlan**

From: Ken Vost <kvost@hotmail.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 20/12/2010 7:14 PM
Subject: Application No:MP08_0195 78-90 Old Canterbury Rd. Lewisham .ConceptPlan

I object to the above Concept Plan for the following reasons:

~It is far too high density with too little public area/green space.(I am not against high density and in fact rent in a 30 apartment block in Summer Hill.)

~The retail section is far bigger than required for residents including those in the proposed redeveloped mill site,and will cause closure of shops in suburbs such as Summer Hill which has a great village atmosphere.

~Traffic past the site is already very dense at rush hour and this will make it intolerable.

Kenneth Vost ,30/40 Junction Rd,Summer Hill 2130