

Marrickville Metro Shopping Centre – Response to Agency Submissions

Agency/Author

Marrickville Council

Issues	Detail of Submission & Issues	AMPCI Response
Consistency with Planning Policy	The EA makes no reference that Council sought the dSSS to be amended to identify the Metro as 'Stand Alone Shopping Centre' and references to the Metro and the surrounding area as a Village and potential future Town Centre be omitted; and that the final South Subregional Strategy has not yet been released	At this time, the SSS remains as a draft. There is no evidence to suggest that the final adopted version of the SSS will incorporate Council's requests. The EA acknowledges that the SSS is a draft policy document.
	The EA does not take into account that the MELS acknowledges the Metro and the area to the immediate south in the general vicinity of the rail line as having potential for conversion to a new centre if adequate public transport access was provided. Consequently, the EA seeks to separate the Metro's proposed expansion from the dSSS and MELS directions that any expansion should be in the context of the site and the immediate environment becoming a new centre. This approach is unsatisfactory from a land use planning perspective and the expansion of the Metro's footprint may compromise the future status of the centre and strategic planning directions for the area.	The project has been declared a Major Project under Part 3A of the Act and accordingly is being assessed ahead of any potential future directions in respect to the recommendations of the MELS. The redevelopment of the Marrickville Metro site can be the catalyst for change and the making of a true town centre.
	This potential conflict could be avoided if any expansion of the Metro were to be limited to the existing footprint of the centre notwithstanding the other impacts of the proposal as highlighted in this report.	There is no planning logic to limit the development to the existing footprint. The DSSS identifies the opportunities to change the land use on the adjoining site and the Concept Plan design creates a vibrant and attractive 'place' by creating an activated retail environment in Smidmore Street.
	Marrickville Action Plans for Urban Centres 2009 (Action Plan) The Action plan does not support the expansion of retail floor area over industrial lands. Accordingly, the redevelopment of the Metro via the Part 3A process is pre-empting the orderly resolution of strategic land use issues through the applicable State and local planning strategies. Therefore, it is appropriate that Council in its submission, oppose	The Draft Sub-Regional Planning Strategy identifies the opportunities for the land at 13-55 Edinburgh Road. To suggest that a broader strategic land use study is required is simply a basis to delay the development opportunities that are already evident and that will not prejudice the future planning of the area, nor the strategic employment lands located to the south of Edinburgh Road.

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	any expansion of the Metro on adjoining industrial land at 13 – 55 Edinburgh Road, Marrickville until the broader strategic land use issues in the area are resolved.	
	The existing shopping centre is in need of revitalisation which may be in the form of opening up the existing centre with more active street frontages and in order for such revitalization to be economically viable; an increase in the retail floor area of the existing centre may be appropriate	Noted
	The concept design as proposed for the existing centre with large spiral driveways and no sympathetic consideration for the surrounding low density residential development, or potential adverse traffic related issues, warrants a review of the whole scheme. As noted, any expansion of the existing centre should not be of a type that is likely to directly compete with nearby commercial centres.	<p>The spiral driveway to Murray Street/Victoria Road has been deleted along with part of the proposed first floor addition to the centre, therefore retaining the predominant single storey interface to the existing residential areas to the north and north-east of the site. This is a significant change to the proposed development that will allow the proposal to sit comfortably within the surrounding built form context.</p> <p>The economic impact assessment identifies that the nature of retail proposed will not directly compete with nearby commercial centres and to the extent that this will occur will not jeopardise the viability of these existing centres.</p>
Economic Impacts	The economic aspects of sustainability suggest at the most obvious level that retail centres need to be economically viable, but in a broader sense that they ought to provide economic opportunities for the community which they serve. This can mean employment opportunities and also the chance to start up new businesses. It is here that concerns about corporately owned and managed shopping malls are raised. Corporate shopping malls tightly control their tenancies, and their particular mix of retail functions are prescribed by a formula considered to provide the lowest risk for the investor.	<p>Refer to detailed response prepared by Pitney Bowes Business Insight.</p> <p>In summary, corporate shopping malls do not tightly control their tenancies but simply provide the tenancy mix that the customers indicate they want.</p>
	The application makes reference to a number of instances where older strip shopping centres have benefited greatly from the construction of large shopping centres, such as, Broadway, Bondi Junction, and Glebe. The point of distinction which needs to be noted here is that all of these centres were co-located within or adjacent to the existing shopping strips. This is not the case with the Metro which is a stand alone shopping centre. In the applicant's	It is PBBI's assessment that the examples provided are relevant irrespective of the distance between the strip and the retail centre. This is established by virtue of the fact that sales generated by a retail centre are more likely to come from similar competing centres as opposed to established retail strips.

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	examples there were more benefits than disadvantages to the existing businesses.	
	<p>The Economic Impact Assessment and Retail Strip Review documents attached to the application comprise dehumanised documents designed to sell the expansion of the Metro as a “must have” for all the right economic reasons whilst at the same time allaying the fears of businesses by attempting to substantiate, more often than not by comparison with developments in neighbouring local government areas, that the commercial impact on local business will be minimal as they have a totally different offering which will draw most of its trade from current ‘escape spending’, that is, the dollars spent in similar expanded centres outside the Marrickville LGA not the dollars spent in the shopping strips.</p>	<p>This comment reflects an ideological position as opposed to a genuine understanding of or concern for the real needs and wishes of the entire community.</p> <p>Research of residents of the Marrickville region shows that about half of them shop primarily outside the area for their clothing, homewares and giftware needs at Sydney CBD, Broadway, Westfield Burwood and Westfield Bondi Junction.</p>
	<p>This is an excellent opportunity for the Metro to become a better corporate citizen by creating a real partnership with the local shopping strips similar to the de facto partnerships evidenced in their case studies of similar expansions, but with real intent and purpose.</p> <p>A commitment to assisting with the upgrade of shopping strips such as Marrickville Road would result in a win - win situation where the existing socio-economic infrastructure is conserved and each precinct can feed off the other.</p> <p>Formally acknowledging the applicant in any voluntary scheme would be part of developing an ongoing business partnership designed to benefit the Marrickville community as a whole and not just single vested interest.</p> <p>For example a very cost effective way to use voluntary contributions would be to paint the commercial buildings in Marrickville Road in approved heritage colours.</p> <p>The right sort of infrastructure investment in the shopping strips coupled with cooperative marketing/promotion and other initiatives will not only offset the indicative 5% impact on current trading but also improve trading levels beyond what they currently are now.</p>	<p>AMPCI is prepared to enter into a voluntary arrangement with Council to support the upgrade of the nearby retail strips. The arrangement will need to be resolved in further detail with Council's Economic Development Manager. One of the options available is to participate in a new initiative of Council being the establishment of an Economic Development Forum and to fund studies/programs that arise from this forum.</p>

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Traffic	The TMAP does not provide a proper assessment of the Option 2; where Smidmore Street will remain open for vehicular traffic.	This assessment is now provided in the amended Transport report prepared by Halcrow.
	The TMAP underestimates the increase in traffic that will use Edgeware Road north of Llewellyn Street, as well as Alice Street and the section of Victoria Road east of the Metro.	This assertion is not agreed with. The analysis outlined in the Halcrow Report explains why there would be little traffic increase on these roads.
	Based on above the traffic impacts at the Edgeware Road / Alice Street / Llewellyn Street and Edgeware Road / Victoria Road intersection would be worse than predicted in the TMAP.	Not agreed – refer to transport report
	<p>To mitigate the intersection performance at Edgeware/ Alice/ Llewellyn the proposal calls for the extension of parking restrictions at the approaches. This will have a significant negative impact on local resident on-street parking availability.</p> <p>Similarly the proposed slip lane and parking restrictions extension in May Street approaching Bedwin Road intersection will significantly impact on street parking availability in May Street.</p>	<p>The required parking restrictions is limited to the loss of 8 car spaces over a half hour weekday period, noting that there are already no-stopping/parking restrictions in place between 3.30 and 5.30pm on weekdays.</p> <p>In any event, the need for such parking restrictions will arise from other development (Council Aquatic Centre and private development on Alice Street) irrespective of the expansion of Marrickville Metro.</p> <p>On May Street, the design has been amended such that the existing parking on the south side of the street is maintained by reducing the east bound provision by a total of 3 spaces only. This option retains the car parking adjacent to the existing residential dwellings. The total loss of 3 spaces is not considered to be a significant impact and will assist to improve the performance of this intersection.</p>
	<p>The proposed roundabout design at Edinburgh Road /Sydney Steel Road:</p> <ul style="list-style-type: none"> - narrows the footpath immediately adjacent to the entrance to the centre on Edinburgh Road where pedestrians are directed; - deflects vehicles (eastbound) towards the entrance of the centre creating a potential safety issue; and - removes footpath area on both Councils bicycle and pedestrian paths at the intersection of Sydney Steel Road and Edinburgh Road. 	<p>The proposal no longer requires the U-turning of buses. Accordingly the roundabout proposed for this intersection has been redesigned to overcome these concerns.</p> <p>A copy of the modified design is provided in the Halcrow Transport report.</p>
	Dates on which traffic surveys were undertaken have not been identified in the Report. The potential influence of seasonal	The traffic surveys were conducted on Saturday 13th and Thursday 18th February, 2010. These dates were not within a school holiday period

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	fluctuations in traffic volumes can therefore not be determined.	
	The TMAP refers to Edgeware Road/Bedwin Road as a “Collector” road when in fact it is a classified Regional Road performing the function of a sub-arterial road. The description needs to be amended.	Addressed in Halcrow Transport report
	There are several laneways in the vicinity of Marrickville Metro, which provide access to local residential driveways. The increase in traffic along Edgeware Road, Victoria Road, Llewellyn Street and Alice Street will potentially decrease the accessibility into and out of these laneways.	The nett traffic increases on these roads are expected to be low and therefore is not expected to impact on access to these lanes.
	Measures proposed throughout the study will potentially have impacts on the availability of on street parking. This needs to be quantified and assessed.	Addressed in Halcrow Transport report
Impact on Buses	Proposed changes to bus operations (i.e. bus stops and re routing) are dependent on agreement being obtained from Sydney Buses	Sydney Buses have been consulted – refer to Halcrow Transport report.
	The additional use of public transport (buses) to access the site in lieu of car trips is based on the premise that additional services/ buses will be provided by Sydney Buses. There is no certainty in this assumption.	<p>Changes/increases in bus services are a matter for Transport NSW to approve and fund.</p> <p>The development proposes a new bus terminus on Edinburgh Road that will enable for increased capacity (3 bus parking areas compared to 2 currently on Smidmore Street). The proposed bus terminus will thus increase bus stop capacity by 50%. This will provide more than sufficient capacity to meet the needs of the proposed expansion.</p> <p>Therefore this additional capacity will assist in the event that additional services are funded.</p>
	The proposal to divert traffic and bus routes along the Edgeware Road extension through the Bedwin Road underpass is not supported. The geometry of the Edgeware Road extension south of Darley Street is not suited to significant increases in traffic nor to buses without significant parking restrictions being introduced along the residential section.	This diversion is not proposed in the amended scheme with Smidmore Street remaining open to traffic.

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Bicycle Provision	<p>The TMAP proposes that the development will initially incorporate bicycle parking for 80 bicycles with an option to increase this as required in the future. However there is no mechanism to ensure that this will occur at a future time. The proposed bicycle provision is a very large reduction on what would be required under Council's DCP and it is not clear how the TMAP arrived at the suggested figure.</p> <p>Also it is considered that the bicycle parking should be provided wholly within the development to avoid obstruction to footpaths, public areas and walking routes adjacent the shopping centre.</p>	<p>The Halcrow Transport report outlines the methodology used to arrive at a proposed provision of bicycle parking which is considered to meet existing and potential future demand over time.</p> <p>Areas set aside for bicycle parking on-site are provided within the northern and southern sections of the development. Refer to amended architectural drawings.</p>
Bicycle & Pedestrian Access	<p>Shirlow Street is a narrow (i.e. approx. 5m wide) one way street and is not wide enough for a contra flow bicycle lane as proposed south of Garden St. Both traffic and parking lanes need to be provided within the road carriageway. A contra flow lane could not be provided without a loss of on-street car parking.</p> <p>Regional Cycle Route No. 5 (stage 2) has been omitted from any proposed works. This is an important regional cycle route to the Metro.</p> <p>A number of pedestrian and cyclist improvements have been proposed as part of the TMAP. It is difficult to provide a proper assessment of some of the pedestrian improvements as no pedestrian volumes are provided in the report.</p> <p>In addition, an anomaly which is shown in Figure 10, is new traffic signals at the intersection of Edgeware Road and Victoria Road. This improvement is not listed in the body of the report and requires</p>	<p>It is now proposed to retain the proposed route from Sydenham Station along Shirlow Street, but to change the route to Sydenham Station so it instead uses Saywell and Cadogan Streets (which form part of an existing cycle route) then use Sydenham Road to get to the Sydenham Road/Shirlow Street intersection.</p> <p>Thereafter a two-way route would continue along Sydenham Road and Railway Parade to Sydenham Station as originally proposed. Regional Cycle Route No. 5 (Stage 2) has been added to the TMAP plans, a copy of which is attached in the Halcrow Transport Report.</p> <p>Table 6.6 in the TMAP indicates that pedestrian trips to and from the centre at the busiest time will increase by about 300 trips per hour. With the reduced floor area in the amended proposal, this would reduce to about 270. Figure 10 in the TMAP indicates that these movements would be spread over about 8 principal access routes to the centre. Thus the increase on any one would be on average about 35 trips per hour.</p> <p>This number would enhance the need for improved pedestrian facilities but would be sufficiently low as to not warrant quantitative capacity analysis. Rather than for capacity reasons, pedestrian improvements are proposed as a matter of good practice and practicality.</p> <p>The anomaly of such traffic signals still being shown on Figure 10 the TMAP pedestrian route improvement plan in the TMAP is acknowledged and the</p>

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	clarification as whether or not it is proposed as part of the TMAP.	plan has been changed. A copy of the changed plan is provided in Halcrow Traffic Report.
	The proposed location of a new marked pedestrian crossing in Edinburgh Road east of Sydney Steel Road is considered problematic due to its close proximity to both a roundabout and proposed bus stop area. There is also no demonstration that the necessary warrants for a marked pedestrian would be met.	The proposed pedestrian crossing would be by way of a central refuge in the splitter island on the approach to the proposed roundabout at the intersection of Sydney Steel Road with Edinburgh Road. Pram ramps would be provided on each side of Edinburgh Road. A marked crossing is not proposed and hence the question of a warrant does not arise.
	The proposed siting of a pedestrian refuge on Edgeware Road, south east of Smidmore Street raises safety concerns due to its proximity to an “S” Bend on Edgeware Road which limits sight distance for pedestrians and traffic.	Ultimately this crossing would be a matter for the Local Traffic Committee. However, since receiving this comment the suitability of this crossing point has been re-examined. From this it has been assessed that the sight distances would be satisfactory at this location – refer to Halcrow Transport Report.
Access Design	These appear to have been removed from Victoria Road which is positive. However new ramps are now closer to the residential end of Murray Street. The increase in expected car traffic is evidenced by the increase in parking bays, therefore a higher volume will have a negative impact on the amenity of the surrounding streets. Car traffic should enter and exit the site on Edinburgh Road and south Murray Street below the Smidmore intersection in the industrial areas.	<p>The amended design has addressed this concern as follows:</p> <ul style="list-style-type: none"> - The proposed relocated ramp to Murray Street has been removed and instead the existing vehicle access ramp will be retained which is located opposite existing industrial uses. - Car traffic will be spread across all entry/exits. <p>It is unrealistic to limit vehicle access to the south of Smidmore Street given the operation of the existing centre.</p>
	Bus stop relocation to Edinburgh Road (Option 2) seems unwarranted and should remain in Smidmore Street as it is more accessible and central to the site layout.	<p>Proposed bus stop location in Edinburgh Road provides for greater capacity for buses (3 bays as opposed to 2).</p> <p>The relocation of the buses provides the opportunity to better activate Smidmore Street.</p>
	Loading dock hours- loading between the hours of 7pm and 7am is unacceptable, therefore Council objects to the loading dock restrictions contained in the statement of commitments, as they presume approval to 24 hour delivery operations. Further to this, if the applicant intends to apply for such hours, this should be explicitly stated as a component of their application (which was not done). There is no reference to 24 hour use of loading docks in the Environmental Assessment Report accompanying the Concept Plan application. There should be no delivery vehicles accessing the site	<p>It is proposed to restrict loading within the centre for the new loading docks (1& 3) between the hours of 7am and 10pm.</p> <p>Refer to amended Statement of Commitments.</p>

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	<p>at night regardless of the recommendations on the Acoustic Logic report.</p> <p>Traffic routes for all deliveries should also be identified as the area is enclosed on 3 sides by residential uses.</p>	
	<p>There is very little circulation space for people disembarking from buses – the building alignment should be pulled back from the street edge to improve the entrance/exit.</p>	<p>The proposed building does step back from the building line (at ground level) adjacent to the new bus stop location which will improve access and circulation.</p>
	<p>Further information is required concerning the location and extent of the proposed “Pickup/ Set down” zone. These would usually be located in close proximity to entrances.</p>	<p>The retention of Smidmore Street for vehicle traffic allows for the designation of pick up and set down locations in close proximity to the entrances to the existing and proposed centre entrances. Refer to Halcrow Transport report.</p>
Urban Design	<p>Introduction of a “corkscrew” circular parking access structure on the corner of Murray Street and Victoria Road is of particular concern - this is a highly visible structure due to its height, shape and the geometry of the intersection. The elevational drawings depict 14 metre high trees to partially screen the view of the ramp from Murray Street. New trees will not perform this function,.</p> <p>A related concern is that the existing historic retained “Vicars” brick wall in the north eastern corner of the site will be dwarfed by this new circular ramp, being built directly behind and above the wall.</p>	<p>The circular ramp is no longer required as the existing entrance ramp is retained.</p> <p>The existing vegetation provides screening to the existing loading docks along Murray Street. The proposal retains the existing vegetation and consolidates the loading docks away from the residential properties.</p> <p>Where necessary new trees are being proposed along Murray Street to bridge across the gap left by the existing dock entrance and to balance the existing trees to be removed to allow for the new consolidated loading dock entrance.</p>
	<p>Construction of a new “discount department store” above the existing centre to replace an existing open deck car park will have a significant adverse visual impact from the surrounding streets. This building also forms the base for a further 2 levels of car parking. The architectural report (Part 2 page 13) indicates a reliance on street trees to screen this imposing form, despite the fact that the majority of existing mature trees that screen the current building are identified for removal. This is particularly the case on the Murray Street frontage.</p>	<p>The amended proposal provides a DDS box that has been reduced in size to address the visual impact particularly to Victoria Road to the north and Murray Street to the east. The trees along Murray Street are being retained except where to provide for the new loading dock entry. New trees will be planted where the existing (redundant) loading entries exist.</p>
	<p>A similar comment is made about the proposed “corkscrew” shaped ramp on the corner of Smidmore Street and Edinburgh Road in the</p>	<p>In design terms, a “corkscrew” ramp is preferred to long straight ramps that will derogate from rather than compliment the architectural design. The</p>

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	new section of the development, which will also be visually prominent, and is considered to have little design or streetscape merit.	corkscrew ramp design creates visual interest. While it is visually prominent, it is also located at that part of the site where there will be least impact on adjacent properties.
	Concern is raised about the introduction of new building bulk directly behind the Mill House in a building adjoining the discount department store accommodating specialty retail and circulation/ access with 2 additional parking levels above. The impact of this visual backdrop on the heritage curtilage/setting of the Mill House is problematic.	<p>The projecting car park structures above the first floor retail addition have been setback a further 9 metres from the original proposal creating a more recessive backdrop to the Mill House curtilage.</p> <p>In combination with the significant setback of the first floor (eastern section) the visual impact on the Mill House curtilage is considerably lessened in the Preferred Project.</p>
	<p>Attempts to integrate architecturally old and new sections of the centre are unconvincing (particularly Murray Street), based on the minimal level of detail provided, and showing retention of existing precast panels.</p> <p>Council would prefer a detailed coherent external treatment and complementary signage strategy to be developed.</p>	<p>The proposal removes the existing precast walls along Murray and Smidmore Street and replaces them with shopfronts and banded brickwork to balance the proposed façades of the Edinburgh Road building. The walls that mask the new loading dock and services will be clad in precast with a grooved pattern that extend the banding effect of the brickwork.</p> <p>The precast will have the same colour oxide as the panels on the building on the Edinburgh industrial site to present a cohesive visual picture along Murray Street. The section of wall that abuts the existing brick wall will be detailed to resolve the two different patterns and materials.</p> <p>A signage strategy will form part of the Statement of Commitments.</p>
	The plaza (enclosure of Smidmore Rd option), is positive - providing a reasonable sized public space and a pedestrian entry for residents walking from the South Newtown area, or disembarking from the buses.	The Smidmore Plaza has been removed at the request of Council. Nevertheless, an attractive public realm will be created with a colonnade on the south side of the street creating an attractive and sunlight public domain.
Flood/Stormwater Management	The report has determined that flooding of Marrickville Metro at Victoria Road begins during a 2 year ARI storm event. To simply say, this is an existing situation and is unacceptable for the redevelopment of this site. The flooding at this location will need to be rectified by the provision of a 1 in 100 year overland flow path and/or the provision of additional or upgraded drainage lines to remove excess flows arriving at the low point in Victoria Road.	<p>It has been agreed with Council that two additional options will be investigated at the detailed design stage noting limitations associated with heritage paving and street trees in Victoria Road:</p> <ul style="list-style-type: none"> - provide pipe drainage from the low point in Victoria Road to an appropriate location on Murray Street; - provide an overland flowpath from the low point on Victoria Road to an appropriate location on Murray Street to achieve a suitable grade.

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		This is included as part of the amended Statement of Commitments
	The report recommends no provision of on site detention (OSD) as the site is located at the downstream end of a large catchment and as a consequence there will be very little benefit in terms of reduction of peak flows. The applicant shall verify this via modelling the flooding adjacent to the site with and without OSD to determine if OSD is required. OSD calculations shall be undertaken assuming that the pre developed site is totally pervious as required by Marrickville Council Stormwater and On Site Detention Code for sites greater than 1000m2.	<p>OSD will be provided as part of the development in accordance with Sydney Water and Council requirements.</p> <p>The on-site detention will be provided in accordance with the requirements of Sydney Water as specified in their letter dated 13 October 2010.</p> <p>This is included as part of the amended Statement of Commitments.</p>
	The low point in the gutter in Edinburgh Road adjacent to its intersection with Steel Road shall be relocated away from Steel Road to ensure a maximum 3% cross fall can be achieved in the kerb side lane of Edinburgh Road. This will require the lifting of the kerb and gutter and footpath from this intersection towards the intersection of Edinburgh Road and Smidmore Street. In addition a new stormwater drainage line shall be provided to drain the relocated low point.	Appropriate upgrading of the road adjacent to the intersection of Edinburgh Road and Steel Road will be undertaken to move the low point further west along the road in accordance with Marrickville Council's requirements.
	All stormwater drainage shall be designed in accordance with Australian Rainfall and Runoff (ARR), Australian Standard AS 3500.3-2003 Stormwater Drainage-Acceptable Solutions' and Marrickville Council Stormwater and On Site Detention Code. Pipe drainage systems shall be designed to cater for the twenty (20) year Average Recurrence Interval (ARI) storm. Major event surface flow paths shall be designed to cater for the one hundred (100) year ARI storm.	Agreed as per Statement of Commitments
Landscape	The removals of the <i>Corymbia citriodora</i> (Lemon Scented Gums) located in Smidmore Street are not supported. These trees are in good health and condition and are the most significant street trees in the immediate area. The Lemon Scented Gums contribute in a substantial way to the amenity of the streetscape and their removal would leave a large void in the local tree canopy.	The amended proposal retains Smidmore Street as a trafficked street and therefore all of the existing mature trees (lemon scented gums) located in the Smidmore Street road reserve will not be directly impacted or require removal as part of the proposed development.

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	Council does not support the removal of Trees 32, 35, 36, 77, 78, 79, 80, 81 and possibly 82, 83 and 84 for having a high landscape/significance value.	All nominated trees are identified for retention in the amended design forming part of the Preferred Project. As the proposed works will be within identified tree protection zones (TPZ's) appropriate statement of commitments are included in accordance with the arborist recommendations.
	Council does not support works that are likely to have a detrimental impact on mature healthy trees with high landscape significance.	Noted – proposed works within defined TPZ's will be undertaken in accordance with the arborist recommendations.
	It is not possible at this stage of the assessment to determine the suitability (structural stability and long term viability) of the retention of Trees 82, 83 and 84. Further information is required to determine the impacts of the proposal.	The retention of the Smidmore Street as a trafficked street at the current road levels will enable the retention and on-going health of the trees. Appropriate measures will be put in place to protect these trees during construction. Refer to amended Statement of Commitments which will ensure adequate detail is provided for assessment prior to the commencement of construction.
	Council does not support works that will detrimentally impact the health and viability of trees 82, 83 and 84.	Trees to be retained under the amended proposal – refer to above.
	It is indicated in the documentation that replacement street trees may not be able to be planted in Murray Street due to the location of subterranean services. The location of all service lines within the Murray Street road reserve need to be identified to clarify the possible planting locations.	The Statements of Commitment have been revised to include the requirement to undertake a services survey before the preparation of a final landscape plan for the public domain. The final landscape plan to be prepared and agreed by Council. Refer to amended Statement of Commitments
	Resourcing of the required maintenance of the raingardens is a concern to Council. Without sufficient maintenance these structures may not function correctly.	Statement of Commitments includes a provision for maintenance by the proponent at no cost to Council.
	Street tree species selection for each of the street frontages is to be undertaken in consultation and in agreement with Marrickville Council.	Yes - included in the revised Statement of Commitments
	The selection of Eucalyptus paniculata (Grey Ironbark) is not	Final street tree specifications to be undertaken in consultation with Council.

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	supported. The proposed container sizes for street trees is considered to be too small and should at a minimum be 200 ltrs. Along Murray Street the trees to be planted should be a minimum container size of 750 litres.	
Heritage	The proposal makes minor improvements to the Mill house plaza area through better utilization of the available space and terracing which is better engaged with both the street and the interior of the Metro site.	Noted – no response required
	The 3d modelling of the Mill House shows a verandah roof added to the western side – this is not acceptable , there should be no changes to the exterior of the Mill House because it is a Heritage Item (No. 2.105, MLEP 2001) and is listed on the Register of the National Trust.	No changes to the exterior of the Mill House are proposed as part of this application. References in the 3D Modelling are a drafting error only. Confirmation in the Statement of Commitments
	A structurally separate terrace for chairs and tables between the Kmart wing and the Mill house is acceptable. It is a pity that the façade at the western end of the site, north of the Kmart space, is not put to better use as an activated street front.	The conscious decision has been taken not to activate the Victoria Road frontage owing to the residential properties directly opposite. No change is proposed.
	The addition of 3 storeys of car parking/retail is a substantial increase in building size which will dwarf the Heritage Item (Mill House), and have a high impact on the residential scale and heritage significance of Victoria Road, and the end of Murray Street. The bulk should be pulled back from the north boundary by a further 30m to reduce impact. The spiral ramps at the corner of Murray Street and Victoria Road are excessively dominant, overwhelming the remnant walls of the Vicars warehouse and severely degrading the outlook from the Mill House and the proposed conservation area along Victoria Road.	The amended plans have significantly reduced the building footprint particularly on the corner of Victoria Road and Murray Street. The spiral ramp on the corner has been removed entirely and the building footprint 'pulled back' approximately 45 metres from that previously proposed. This will significantly or totally remove the visual impact of the new development from the corner of Victoria Road and Murray Street. The new building will still be visible to the south of the Mill House, but the car park deck has been further setback removing the cantilever which addresses the concern about the Mill House being overwhelmed.
ESD	The proposed development does not demonstrate any real commitment to sustainability and to reducing the carbon/ecological footprint of the redeveloped Metro. Initiatives around water management are encouraging where rainwater tanks will store water for reuse within the centre and	Lend Lease design considers embodied energy as described in Section 6.5 of the ESD report. The carbon analysis carried out on retail centres shows that up to 80% of the embodied energy will be in four key areas; concrete and steel structure, facade selection, internal partitioning and floor finishes. LLD construction teams have consistently reduced embodied energy by using flyash as cement replacement, steel reinforcement with up to

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	<p>where surface water will be treated through some rain gardens. From the material provided it is clear that the redeveloped Metro will be more energy and water efficient than the existing centre, however this is largely due to: the improvements and expectations of current building standards, availability of improved technology and the poor rating and efficiency of the current Metro.</p> <p>There is no mention of embodied energy in the EA in terms of the construction and choice of building material.</p> <p>The EA makes no references to innovations in energy generation – for example tri/cogeneration or renewable energy. The notion taken in the EA that decentralised or local generation is less efficient is incorrect and demonstrates a lack of knowledge in this area.</p> <p>A combination of some new innovations and largely traditional methods of heating and cooling may improve the centre's efficiency but given the proposed expansion across the site there will still be significant emissions from the centre.</p>	<p>100% recycled content, lightweight internal blockwork and safe, natural non-slip floor finishes that require minimal ongoing maintenance (no chemicals or energy use). All of this experience will be brought to the detailed design of Marrickville Metro.</p> <p>The application considers the use of onsite renewables and co-generation (also commonly referred to as trigeneration once absorption cooling is added) in Section 6.1. The provision of on-site solar renewables is straightforward and has little ongoing operational implications for the owner but the provision of gas-fired decentralised power is not so straightforward and should be managed by a specialist energy services company (ESCO)). Decentralised cogeneration increases reliance on natural gas (fossil fuel) infrastructure and introduces issues of local air quality for nearby residents. Many experts in the industry recognise cogeneration as a transition technology that can be used to reduce our reliance on fossil fuels but it can only go so far; a truly zero carbon future can only be delivered by renewable energy sources and solutions that take us straight to that scenario, leapfrogging any transitional fossil fuel based solutions, are certainly of equal merit to cogeneration.</p> <p>Whichever path is taken to reduce energy supply side emissions the first priority should always be to reduce energy demand. AMPCI will be investing in efficient building services that minimise the energy used to light and condition the space while maintaining appropriate air quality and visual and thermal comfort.</p>
Waste Management	<p>The waste management plan offers basic processes for tenants to recycle cardboard, paper and plastics and mentions an opportunity for organic waste separation which is not backed up by any firm proposals.</p> <p>However reuse of organic waste does not appear to be a high order objective in the operation of the new centre – the report states there may be end users for the organic product but, if not, this waste will go to landfill. There are many options available to the Metro to manage this waste and to avoid it ending up in landfills but these</p>	<p>Approximately half of all waste in landfill is organic and the decomposition of this waste is a key contributor to methane levels in the atmosphere, a significant greenhouse gas. Separation of organic waste at source is not common but the method used by most proponents is to send the material to a third party off-site where it can be converted to fertiliser and methane for generating power.</p> <p>AMPCI will identify and implement an operational waste strategy that builds and improves on current recycling practice at Marrickville Metro. The strategy will include recycling/recovery targets for each waste stream</p>

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	have not been explored.	appropriate to this size of development that will ensure all waste, and in particular organic waste, is recycled wherever feasible.
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State Transit Authority (STA)

Issues	Detail of Submission & Issues	AMPCI Response
Design Information	A scale, engineering drawing that displays the proposed new bus interchange on Edinburgh Road. This drawing needs to include, length of bus zones, lane widths, locations of j-stream, shelters, infrastructure and any potential implications. It should be noted that for 3 bus operation as shown on <i>Drawing (160496:EA006) Proposed Ground Floor Plan</i> a minimum of 80 metres of bus zone would need to be provided.	Refer to Civil Engineering Drawings provided by Cardno
	A scale, engineering drawing that displays the proposed alterations and construction of a round about at the Intersection of Edinburgh Road and Sydney Steel Road. This drawing needs to include, height and dimensions for the roundabout, any changes to the intersection, and an auto turn path demonstrating its suitability for 12.5 metre buses.	Refer to Civil Engineering Drawings provided by Cardno
	A scale, engineering drawing that displays the proposed alterations and construction of a round about at the Intersection of Smidmore Street and Murray Street. This drawing needs to include, height and dimensions for the Roundabout, any changes to the intersection, and an auto turn path demonstrating its suitability for 12.5 metre buses.	Refer to Civil Engineering Drawings provided by Cardno
	A scale, engineering drawing that displays the proposed alterations and construction of a round about at the Intersection of Edinburgh Road and Murray Street. This drawing needs to include, height and dimensions for the Roundabout, any changes to the intersection, and an auto turn path demonstrating its suitability for 12.5 metre buses.	Refer to Civil Engineering Drawings provided by Cardno
	Drawing (160496:EA006) Proposed Ground Floor Plan: Briefly outlines loading Dock 1 on the corner of Edinburgh Road and Murray Street. There does not appear to be a driveway leading into loading dock 1, can you please advice of the location of the entrance	The loading dock entry off Murray Street is shown on the plans accompanying the EA. Entry location further clarified in amended plans forming part of the PPR.

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	driveway.	
Construction Management	A detailed traffic management plan particularly during the demolition and constructions phases needs to be provided on how bus operations will be undertaken during the proposed construction. It should outline the proposed staging, when the current bus interchange will be unavailable for use, what temporary arrangements are required, how construction traffic will be managed and when the proposed new interchange will be available for use. All these factors will need to be approved by STA, to ensure minimal impact on bus operations and passengers.	<p>A detailed construction management plan is included in the Statement of Commitments.</p> <p>The SOC's have been amended to specifically address the construction management measures associated with the bus operations.</p>
Alterations to Bus Routes	The Department of Planning and the Proponent should note that the proposed re routing of the 308, 352 and 355 services that currently operate to Marrickville Metro will require the approval of Transport NSW before any changes are implemented.	Re-routing of the bus services no longer required due to Smidmore Street being accessible to traffic including buses.

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Rail Corp

Issues	Detail of Submission & Issues	AMPCI Response
	The TMAP outlines various measures to improve public transport and active transport usage by users of the shopping centre. These measures include; low parking provision rates, improved pedestrian and cycling connections to St Peters and Sydenham stations, new bicycle storage facilities, and improved information on public transport services. All of these measures are encouraged by RailCorp as they support the provision of town centres in the form of Transit Oriented Development (TOD).	Noted – no action required
	RailCorp supports measures aimed at improving wayfinding and signage for pedestrians from the shopping centre to St Peters and Sydenham stations, in order to support alternative means of transport. The associated directional signage must meet RailCorp standards and be submitted to RailCorp's Communications Department for review.	Addressed in the revised Statement of Commitments

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RTA (Sydney Regional Development Advisory Committee)

Issues	Detail of Submission & Issues	AMPCI Response
	<p>The RTA advises that the major roads in close proximity to the subject site (ie. Edgeware Road, Bedwin Road, Campbell Road, Llewellyn Street, Alice Street and Addison Road) are regional roads under the care and control of Council.</p> <p>Therefore, comment should be sought from Council with regard to the traffic impact of the proposed development on the road network in proximity to the subject site.</p>	<p>Noted</p> <p>Council's comments addressed in Preferred Project Report and associated TMAP as outlined above.</p>
<p>Changes to Local Parking Restrictions</p>	<p>It is noted that the submitted TMAP recommends the following additional parking restrictions on the road network to maintain the existing level of service post construction of the proposed extension of Marrickville Metro:</p> <ul style="list-style-type: none"> • Extend the length of parking restrictions on Edgeware Road southbound approach and on the Alice Street westbound approach of the Edgeware Road/Alice Street/Llewellyn Street intersection by 50 metres during weekday evening and Saturday morning peak periods; • Extend the length of peak periods "No Stopping" restriction on May Street approach of Unwins Bridge Road/Bedwin Road/ May Street/Campbell Street intersection by 80 metres. • 60 metres parking restrictions (clearway or permanent) on the Unwins Bridge Road approach to the intersection of Unwins Bridge Road/Bedwin Road/ May Street/Campbell Street <p>Subject to Council supporting these regulatory signs, these signs will require the approval of Council Local Traffic Committee.</p>	

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Changes to Signal Phasing	<p>The TMAP recommends modifying the existing layout of the intersection of Unwins Bridge Road/Bedwin Road/May Street/Campbell Street and changing the signal phasing of this intersection, which requires approval of the RTA under Section 87 of the Roads Act, 1993.</p> <p>The RTA is not in a position to determine whether to approve the proposed modification to this existing signalised intersection until such time that an electronic copy of the Sidra analysis and a detailed concept plan of the modified intersection is submitted to the RTA for review.</p>	These have been submitted to the RTA by Halcrow.
	The RTA requests that the methodology used for determining the trip distribution and route assignment of the additional traffic generated by the proposed development be submitted to the RTA for review.	
	The State Transit Authority (STA) and Transport NSW shall be consulted for the proposed additional bus services and bus stops and this consultation shall be to the satisfaction of the Department of Planning.	
	The provision of off-street car parking, loading area and bicycle storage should be provided to the satisfaction of Department of Planning.	Noted
Design Specifications	The layout of the proposed car parking areas, and driveway associated with the subject development (including, grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) should be in accordance with AS2890.1 – 2004.	Addressed in revised Statement of Commitments
	Clear sight lines shall be provided at the property boundary line to ensure adequate visibility between vehicles leaving the car park and pedestrians along the frontage road footpath in accordance with Figure 3.3 of AS 2890.1 – 2004 for light vehicles and AS 2890.2 – 2002 for heavy vehicles.	Addressed in revised Statement of Commitments
	The parking areas and entry/exit points need to be clearly delineated	Addressed in revised Statement of Commitments

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	through line marking and signage to ensure smooth, safe traffic flow.	
	The swept path of the longest vehicle entering and exiting the subject site and loading area, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to Department of Planning for approval, which shows that the longest vehicle can access the site via the existing road network.	Addressed in revised Statement of Commitments
Operational Issues	All loading and unloading shall occur on site.	Addressed in revised Statement of Commitments
	Appropriate street lighting shall be provided at the driveway entry and exit in order to provide adequate visibility at night.	Addressed in revised Statement of Commitments
	All vehicles are to enter and leave the subject site in a forward direction.	Addressed in revised Statement of Commitments
	All vehicles should be wholly contained on site before being required to stop.	Addressed in revised Statement of Commitments

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Transport NSW

Issues	Detail of Submission & Issues	AMPCI Response
	Provision of up to five car share spaces within the centre car parks with monitoring and further expansion subject to demonstrated demand.	Provided and specified on amended plans accompanying PPR. Monitoring of demand addressed in Statement of Commitments.
	Bicycle parking should be well signed and provided in weather protected locations, close to retail entrances and subject to passive surveillance.	Amended plans prepared identify locations of proposed bicycle parking.
	Information and signage about cycleways and bike facilities available at the Metro Centre and within the locality should be provided as per Item 10.5 - Pedestrian Way Finding Signage contained in the TMAP.	Addressed in revised Statement of Commitments
	Transport NSW requests the Green Travel Plan and Travel Access Guide be prepared with reference to the Premier's Council for Active Living - Workplace Travel Plan Resource, http://www.pcal.nsw.gov.au/ . and the Road & Transport Authorities - Travel Access Guide guidelines, http://www.rta.nsw.gov.au .	Addressed in revised Statement of Commitments
	<p>Roundabouts are difficult for pedestrians and cyclists to negotiate where their safety is at risk from unpredictable traffic, as indicated in the NSW Government Planning Guidelines for Walking & Cycling (2004). Given the proposal aims to enhance pedestrian access to the site yet, includes several roundabouts along main pedestrian routes that link to bus and rail networks - Transport NSW requests further consideration of the following improvements to pedestrian accessibility to enhance the connectivity of surrounding streets to public transport networks and increase customer safety, as detailed in the TMAP:</p> <ul style="list-style-type: none"> -A new pedestrian crossing in Edinburgh Road east of Sydney Steel Road; and - A new pedestrian refuge across Edgeware Road south east of 	

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	Smidmore Road.	
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Sydney Water

Issues	Detail of Submission & Issues	AMPCI Response
Construction over existing assets	<p>Sydney Water objects to the proposed development being located above the Marrickville Valley (SWC 66) stormwater channel.</p> <p>It is Sydney Water's strong position that all reasonable efforts be undertaken to avoid locating new building structures over Sydney Water's stormwater assets.</p> <p>Sydney Water would be prepared to consider an amended development proposal which considers the following options:</p> <ul style="list-style-type: none"> • A clear access zone being provided around and above the stormwater channel. • Other options as discussed and agreed upon with Sydney Water. 	<p>Noted</p> <p>In further discussions with Sydney Water, it has been agreed that:</p> <ul style="list-style-type: none"> - The culvert under the new building (13-55 Edinburgh Road) will be upgraded as part of the new development to match or exceed the lifespan of the built over structure. - The requirement to upsize the culvert would be established after review of the existing flood study results for the local catchment. <p>Addressed in revised Statement of Commitments.</p>
Flood Risk	<p>Figure 3b of the Infrastructure and Hydrology Report by Golder Associate indicates a significant flood hazard exists around the Mill House / Civic Place entry area adjacent to Victoria Road. Flood depths in excess of one metre are modelled to occur in this area and would likely inundate the existing development.</p> <p>It is recommended a site-specific flood emergency response plan be prepared for the existing development.</p>	<p>It is agreed that a flood risk management plan will be prepared as a condition of development consent.</p> <p>Refer to revised Statement of Commitments.</p>
On-site detention	<p>Consistent with the advice and requirements that have applied to other developments in this part of the Marrickville Valley stormwater catchment area, Sydney Water will require on-site detention for this development.</p>	<p>OSD will be provided for the new development at 13-55 Edinburgh Road. The storage requirements and the permissible site discharge data will be determined in further consultation and agreement with Sydney Water.</p>
WSUD	<p>While aspects of the Water Sensitive Urban Design (WSUD) proposals contained in the project application documentation have merit, they fail to address the water quality objectives of the development site. On-site detention is not widely considered to be a WSUD element, while the proposed bioswales on Victoria Road and</p>	<p>It is agreed that WSUD measures will be provided for the new development of 13-55 Edinburgh Road to meet the 1997 NSW EPA requirements.</p> <p>Improvements will be made to the existing shopping centre where feasible but there are significant constraints associated with the existing building that</p>

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	<p>Murray Street address existing water quality from public roads.</p> <p>Sydney Water strongly supports the Director General's Requirements regarding the incorporation of WSUD measures. In this regard, Sydney Water recommends a WSUD Strategy be prepared for the development site and the Strategy submitted as part of the major project application. The WSUD Strategy should include the establishment of a stormwater quality model for the development to predict expected stormwater quality pollutant loads and a strategy to achieve the stormwater quality targets nominated below.</p> <p>The WSUD Strategy should also detail the location, size and configuration of the stormwater treatment elements, and provide a summary of MUSIC parameters (rainfall, source nodes and treatment nodes) and results.</p>	<p>will limit this potential.</p> <p>It is proposed to prepare a detailed WSUD Strategy that will detail available initiatives and include:</p> <ul style="list-style-type: none"> - a stormwater quality model; - the location, size and configuration of stormwater treatments - a summary of MUSIC parameters. <p>This is included in the revised Statement of Commitments</p>
Further Approvals	<p>A trade waste permit must be obtained before any discharge can be made to the sewer system. The permit is also needed for site remediation purposes. Applications for a trade waste permit can be made to Sydney Water at the Section 73 Certificate application stage.</p>	<p>Addressed in revised Statement of Commitments</p>
	<p>Sydney Water will further assess the impact of individual developments when the proponent applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess if amplification and/or changes to the system are applicable. Sydney Water requests the Department of Planning to continue to instruct proponents to obtain a Section 73 Certificate from Sydney Water.</p>	<p>Addressed in revised Statement of Commitments</p>

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RTA (Property)

Issues	Detail of Submission & Issues	AMPCI Response
Building Height	Increase in building height to the north eastern side of the Metro site is over bearing to the single storey residential houses.	The amended plans forming part of the PPR specifically address this issue and remove the building bulk from this corner.
Murray Street ramp	Location of ramp immediately opposite the residential properties fronting Murray Street.	The amended plans retain the ramp off Murray Street in the existing location thereby not impacting on the residential properties located further north.
Increase in traffic to Murray Street	Increase in traffic in Murray Street owing to the closure of Smidmore Street.	Smidmore Street to be retained as a trafficked street as part of the amended proposal.
Loss of Mature Trees	Loss of mature trees immediately fronting Murray Street.	This impact has been mitigated by the retention of the existing vehicle ramp. The rationalisation of the loading docks will enhance opportunities for landscaping opposite the residential properties.