

OUR REF: 3415
YOUR REF:

8 September 2010

Sam Haddad
Director General
Department of Planning
PO Box 39
Sydney NSW 2001

Dear Mr Haddad

**Marrickville Metro Shopping Centre Redevelopment
Concept Plan Application under Part 3A of the Environmental Planning and
Assessment Act 1979**

An Environmental Assessment Report, prepared on behalf of AMP Capital Investors (AMPCI), to accompany a concept plan application under Part 3A of the Environmental Planning and Assessment Act 1979 has recently been forwarded to Council for the redevelopment of the Marrickville Metro Shopping Centre. The concept plan and the associated environmental assessment report for the redevelopment of Marrickville Metro Shopping Centre are on exhibition between 28 July 2010 and 10 September 2010.

Council at its meeting on 7 September 2010, considered an assessment report prepared by Council's officers and external consultants on the proposed redevelopment project. Council resolved:

To make a submission to the Department of Planning opposing the proposed expansion of the Marrickville Metro Shopping Centre at its current site being 34 Victoria Road, Marrickville and construction of a new retail complex at 13 – 55 Edinburgh Road, Marrickville.

With regard to granting owner's consent to use part of Smidmore Street for the proposed redevelopment, the Council resolved:

Council does not grant owner's consent with regard to the Option 1 development proposal which proposes the closure of part of Smidmore Street including the airspace, and advise the Department of Planning and AMPCI accordingly.

Council also resolved to:

Request that an independent hearing and assessment panel (IHAP) be established to consider all aspects of the proposed redevelopment, since Council is not the determining authority.

Further to Council's resolution please find attached Council's submission.

For any queries in relation to this matter please contact Marcus Rowan, Manager Planning Services on 9335 2274.

Yours sincerely

A handwritten signature in black ink, consisting of a large loop followed by a horizontal stroke that extends to the right.

Simon Grierson
A/Director, Planning & Environmental Services

Introduction

This submission evaluates an Environmental Assessment (EA) report, prepared on behalf of AMP Capital Investors (AMPCI), to accompany a concept plan application under Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act) for the redevelopment of the Marrickville Metro Shopping Centre (the Metro) at 34 Victoria Road and extension of the Metro on to adjacent land at 13-55 Edinburgh Road and part of Smidmore Street, Marrickville. The concept plan and associated environmental assessment reports are on public exhibition between 28 July 2010 and 10 September 2010.

The proposed redevelopment of the Metro seeks an expansion of the existing retail centre through the addition of three levels to the existing centre (north wing) and a 4 storey retail complex to the south (south wing) of the Metro, at 13 – 55 Edinburgh Road. Both north and south wings of the Metro are proposed to be connected by pedestrian and vehicular links over Smidmore Street which is proposed to be converted into a pedestrian mall as the preferred option (Option 1). The alternative option (Option 2) for the proposed redevelopment of the Metro excludes Smidmore Street and does not include any pedestrian or vehicular links above Smidmore Street.

This submission considers:

- the key environmental and economic impacts of the proposed redevelopment of the Metro;
- the consistency of the development with the draft South Subregional Strategy 2008 (dSSS), Marrickville Urban Strategy (MUS) and other land use planning policies;
- the Director General's Requirements (DGRs) for the project; and
- other planning considerations including traffic, built form, heritage and streetscape issues.

This submission notes that Council officers have met with the applicant on several occasions for the purpose of discussing public infrastructure requirements, contributions in relation to the proposed development, the proposed closure of Smidmore Street and the contents of a potential Voluntary Planning Agreement (VPA).

BACKGROUND

The draft South Subregional Strategy (dSSS) identified the Marrickville Metro Shopping Centre (the Metro) and its immediate surroundings as a Village Centre with potential to develop into a Town Centre. Council objected to that position in March 2008, and sought that the dSSS be amended to identify the Metro as a 'Stand Alone Shopping Centre', and that references to the Metro and the surrounding area as a Village Centre and potential future Town Centre be omitted. Council also requested that references to the Metro as having the potential for expansion be removed. The dSSS has not been finalised at the date of this submission. A more detailed discussion of Council's submission on dSSS is provided later in this submission.

Council received the draft Director General Requirements (DGRs) on 27 January 2010. Council made a submission on the draft DGRs on 5 February 2010 which raised a range of strategic land use, economic, transport and other issues. A copy of draft DGRs and Council's submission are included at **ATTACHMENTS 1 and 2**.

At its meeting on 20 July 2010, Council resolved:

To write to the Minister for Planning and the local State Member requesting that the Metro development be handed back to the local Council (as elected by the residents) for determination.

At the same meeting Council also resolved that:

In view of the size and nature of the proposal, it is considered that Council should request the Director General of the Department of Planning to extend the public exhibition period for the proposal to a minimum of 60 days.

Correspondence has been forwarded to the Minister for Planning, local State Member and Director General of the Department of Planning concerning the second resolution on 27 July 2010.

Council at its meeting on 17 August 2010, further resolved:

The Department of Planning be requested to extend the Part 3A application consultation period for another 30 days to enable the Chamber of Commerce and other stakeholders to properly respond.

Correspondence was forwarded to the Director General of the Department of Planning concerning the above resolution on 18 August 2010.

At the time of this submission being prepared, Council had not received a decision from the Minister for Planning concerning Council's request to act as the consent authority in determining the proposed Part 3A expansion of the Metro.

On 20 August 2010, the Hon. Carmel Tebbutt, MP, Deputy Premier and Minister for Health issued a media release announcing the extension of public exhibition period for the proposed redevelopment of the Metro by another two weeks to 10 September 2010. Council received a letter to that effect from the DoP on 25 August 2010.

Included at **ATTACHMENTS 3 to 7** are copies of Council's letters to the Minister for Planning, Local Member Parliament, the Director General of the DoP and the letter from the DoP advising of the extension of the public exhibition period.

Zoning provisions

34 Victoria Road, Marrickville

This site is zoned Business General (3A) under Marrickville Local Environmental Plan 2001 (MLEP 2001). Under the zoning provisions applying to the land, the proposed development, involving an extension of the existing retail centre is permissible with Council's consent.

13 – 55 Edinburgh Road, Marrickville

This site is zoned General Industrial (4A) under MLEP 2001. Under the zoning provisions applying to the land, the proposed development, seeking the construction of a new retail complex is a prohibited development.

Draft Marrickville Local Environmental Plan 2010 (dMLEP 2010)

The proposed new zones under dMLEP 2010 for the subject sites are equivalent to the existing zonings under Marrickville Local Environmental Plan 2001.

DISCUSSION

Subject sites and surrounds

34 Victoria Road, Marrickville (north wing)

The Metro is currently located at 34 Victoria Road, Marrickville with a total site area of approximately 35,200m². The site is bounded by Victoria Road to the north, Smidmore Street to the south and Murray Street to the east. An access handle connects the Metro to Bourne Street to the west (this access is currently not used for access to the Metro). The site comprises a single storey retail complex with rooftop parking. The site has pedestrian entries from Victoria Road and Smidmore Street and vehicular access ramps from Murray Street and Smidmore Street. There are a number of loading/unloading docks along Smidmore Street and Murray Street.

13 – 55 Edinburgh Road, Marrickville (south wing)

The proposed development seeks an extension of the Metro over Smidmore Street and the adjacent industrial land at 13 – 55 Edinburgh Road, Marrickville. This land has a total site area of approximately 9,125m². This site is bounded by Smidmore Street to the north, Edinburgh Road to the south and west and Murray Street to the east. The site comprises a two storey industrial building located on the eastern half and a single storey building and open parking area on the western half of the site.

Proposed development

Basic summary (as provided by the applicant)

Increase gross floor area (GFA)	From existing 29,638m ² to 57,935m ² (this includes 13,465m ² of additional floor area of the proposed new shopping complex at 13 – 55 Edinburgh Road)
Increase in gross lettable area (GLA)	From 22,933m ² to 44,403m ²
Total number of parking spaces	1815 spaces (750 new spaces)
Maximum height	14.5m
Estimated Value of the project	\$165 million

34 Victoria Road, Marrickville (north wing)

The concept plan provides the following details for the proposed development:

The majority of the buildings located on the site occupied by the existing Marrickville Metro Shopping Centre are to be retained. The following demolition works to the centre will include:

- *Structures located on Level 1 including the decked car park structure.*
- *The existing redundant vehicle access ramp located on the Victoria Road frontage.*
- *Building elements on the frontage to Smidmore Street.*

Existing shopping centre

Ground floor

- *Creation of new retail floor space to the north eastern corner of the site (in the location of the redundant access ramp) behind the former Vicars wall.*
- *Creation of new retail floor space fronting onto Smidmore Street plaza.*
- *Reconfiguration of specialty retail shops.*
- *Rationalisation of the existing loading docks on the Murray Street frontage into a single consolidated facility.*
- *Reconfiguration of internal access including installation of travelators and access and relocation of amenities.*

First floor

- *Construction of first floor addition to south eastern portion of existing building providing a setback between 30 and 45 metres from the northern boundary and approximately a 37 metre setback from the western boundary.*
- *Provision for a large retail floor plate for discount department store and back of house.*
- *Specialty retail tenancies.*
- *Specified area dedicated for community use fronting onto Smidmore Street.*
- *Internal access link with the new building to the south.*

Second and third floors

- *Construction of a new roof top car park (over 2 levels) above the first floor retail extension.*

13 – 55 Edinburgh Road, Marrickville (south wing)

The proposal seeks to demolish the existing industrial buildings on the site and construction of a new 4 storey shopping complex to match the proposed extension of the Metro. The applicant submitted the following details of the proposed development on this site:

Ground floor

- Construction of new specialty retail fronting Smidmore Street plaza.
- New loading dock facility with access off Murray Street.
- Retail pedestrian entry from Smidmore Street plaza via new retail link.
- New retail space for mini major fronting Edinburgh Road.
- New market place centrally located to retail space within mall area.
- Pedestrian entry from Edinburgh Road.
- Installation of new amenities and travelators to the south western corner of the building.

First floor

- New supermarket above loading from below.
- New specialty retail and internal access space.
- Amenities and travelators.
- Pedestrian link over Smidmore Street plaza to northern portion of the site.

Second and third floors

- Roof top car parking for 190 cars on level 2 and 200 cars on level 3.

Connections between north and south wings

To connect the redeveloped Metro (north wing) with the new shopping complex at 13 – 55 Edinburgh Road (south wing), the applicant has proposed two options detailed below:

Preferred option (Option 1)

The applicant proposes to purchase Smidmore Street from Marrickville Council, close the road and convert it into a pedestrian mall. The first floor levels of both north and south wings are connected through pedestrian walkways and at second and third floor levels, through vehicular crossings. To execute this option the applicant seeks to enter into a voluntary planning agreement (VPA) with Council.

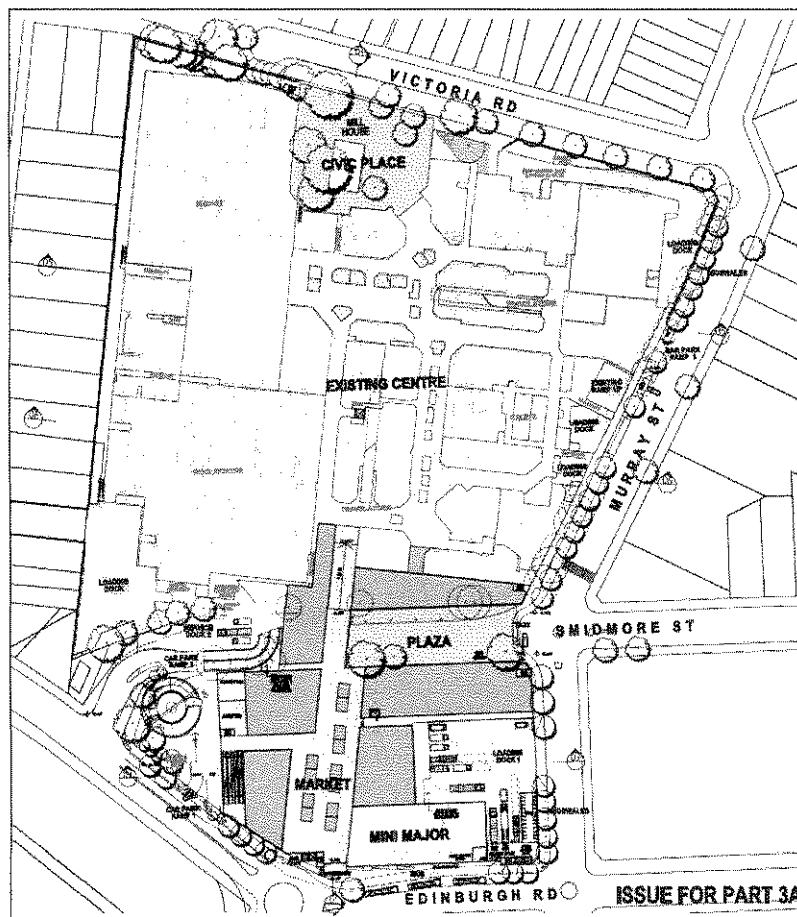


Figure showing two wings of the proposed Metro with pedestrian mall on Smidmore Street and pedestrian and vehicular connections between the two wings.

Alternative option (Option 2)

The applicant proposes an alternative option in the event that Council refuses to transfer the ownership of Smidmore Street. This option is largely the same as Option 1 with the exception that Smidmore Street remains trafficable (minus buses which are proposed to be rerouted to Edinburgh Road), and there is no physical connection between the north and south wings of the proposed development. A pedestrian crossing across Smidmore Street would connect the north and south wings.

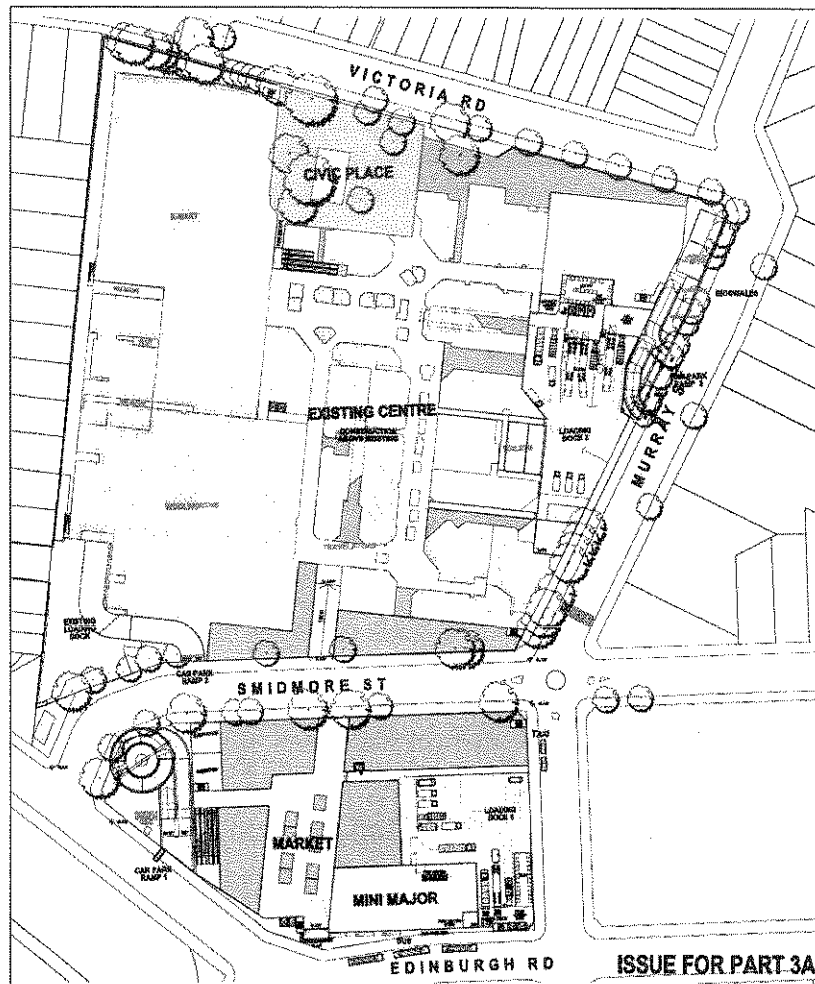


Figure showing two wings of the proposed Metro with no physical connections and Smidmore Street remaining open for vehicular traffic.

Staging of proposed development

The applicant seeks to carry out the development in stages to allow the existing retail activities at the Metro to continue. The applicant has provided the following details for each stage of the work:

Stage 1

- Redevelopment of the industrial site at 13-55 Edinburgh Road to accommodate the two level retail centre.
- New vehicle entrance from Edinburgh Road and circular ramp for access to upper level parking.
- Creation of pedestrian plaza along Smidmore Street between Murray Street and Edinburgh Roads.
- Construction of the connection between the new building and the existing centre over Smidmore Street.
- Refurbishment and expansion of the existing shopping centre building along the southern side fronting the new Smidmore Street Plaza.

- *Reconfiguration and expansion of works to the centre along Victoria Road behind Vicars walls.*
- *Landscaping and public domain works to Civic Place & Smidmore Plaza.*

Stage 2

- *Construction of the first floor addition over the existing shopping centre to accommodate a discount department store, new back of house space and new specialty retail tenancies and internal circulation space.*
- *Reconfiguration of ground floor retail space within existing shopping centre building and alterations to internal circulation and access including new travelators and lift access.*
- *Consolidation and reconfiguration of loading docks on the eastern side of the existing shopping centre fronting Murray Street.*
- *New vehicle access via Murray Street and circular ramp in north east corner of the site.*
- *Construction of 2 levels of parking above the new extension to the existing shopping centre building and the new building on the southern portion of the site (13-55 Edinburgh Road) and connection ramp access for vehicles and pedestrian lifts and travelators.*
- *Footpath upgrade and landscaping work along Murray Street (north of Smidmore Street) and Victoria Road.*

Owner's consent to develop on part of Smidmore Street

For Option 1, Council's consent (as the owner of Smidmore Street) is required. AMPCI has requested that Council grant owner's consent to its application. The DoP wrote to Council on 20 May 2010 seeking advice as to whether Council intended to grant owner's consent. A reply was provided to the DoP on 3 June 2010 advising:

At this stage, Council has not given formal consideration to the granting of owner's consent to the application. This is primarily on the basis that any decision will need to have regard to the development outcome that will occur under the various redevelopment scenarios. Until the concept plan and supporting studies are available Council is not in a position to make this assessment.

In the meantime, Council officers will continue to liaise with the proponent on all aspects of the development proposal.

Council at its meeting of 7 September 2010 resolved not to sell any part of Smidmore Street for the proposed redevelopment of the Marrickville Metro Shopping Centre.

Draft voluntary planning agreement (VPA)

The applicant has submitted a draft voluntary planning agreement (VPA) as part of the concept plan application and has held discussions with Council officers concerning the contents of any VPA, should the development proceed. The VPA sets out what financial contributions are proposed to be made (either by monetary contributions or works in kind) as part of the development. The VPA, if executed, would supersede the payment of any section 94 contributions.

Since Council has resolved not to proceed with the sale and closure of Smidmore Street, the VPA, as far as it relates to the contributions for Smidmore Street would not apply and the applicant has advised that it will pursue Option 2.

Marrickville Chamber of Commerce (MCC)

The Marrickville Chamber of Commerce (MCC) has commissioned independent studies on the strategic planning, economic and traffic aspects of the proposed redevelopment for the Metro. In accordance with Council's resolution at its meeting on 17 August 2010, Council's officers have been liaising with consultants undertaking these studies on behalf of the MCC. This information was not finalised at the time of preparing this submission.

Economic impacts assessment

The EA includes an Economic Impact Assessment by Pitney Bowes Business Insight. This submission acknowledges that the proposed redevelopment of the Metro would have negative impacts on the existing retail strips within the LGA, with Marrickville and Illawarra Roads being the most affected retail centres. The executive summary of the Economic Impact Assessment states:

"The two predominant retail formats currently offered within the Marrickville Metro main trade area, namely shopping centre and retail strip, currently coexist comfortably. There is no reason to expect this relationship will not continue after Marrickville Metro is expanded. Illawarra and Marrickville Roads are expected to experience the greatest trading impact (-5%) as a result of the proposed expansion, but this will not threaten their ongoing viability."

Council's Economic Development Manager has provided the following comments concerning the economic impacts of the proposed redevelopment:

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.

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 examples there were more benefits than disadvantages to the existing businesses. The mere benefits are the improved infrastructure which often includes upgrading of roads and improved traffic flows, additional parking, underground power, streetscape face lift etc., add this to the attraction of one stop shopping provided by large malls and you have something which is very attractive thus increasing customer flows not only to the centre but also to the adjacent businesses. A type of de facto partnership is created between the new centre and the existing businesses.

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. This sidesteps the real issues related to the impact on the community in which local small business plays an extremely important role.

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. 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. 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. 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. 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.

In the long term, investment in the conservation of the shopping strips provides far greater returns socially and economically to the Marrickville community through improved liveability, enhanced sense of place and community, and conservation of its history and heritage than a shopping mall ever could.

Should the development be approved by the DoP, the impacts of the proposed redevelopment on existing retail strips could also be minimised by restricting any new floor space to large retailers such as supermarkets and department stores with no additional floor space provided for smaller scale speciality retail.

Environmental assessment

Strategic land use issues

Council made a detailed submission in response to the draft DGRs on 5 February 2010. Council's submission argued against any expansion of the Metro on the following strategic land use grounds:

In relation to key issue 4 in the draft DGRs, Council's position concerning any expansion of the Marrickville Metro shopping centre was established by the adoption of the Marrickville Urban Strategy (MUS) and its consideration of the draft South Subregional Strategy (dSSS) at its May 2008 Development and Environmental Services Committee meeting. This position is that the expansion of the shopping centre could have a detrimental impact on the viability of the existing shopping strips in the LGA.

In this context, despite the dSSS acknowledging the difficulties being experienced by businesses on Marrickville Road (SO B3.2.3, Page 71 dSSS), the dSSS promotes the Metro's expansion onto the Edinburgh Road properties owned by the proponent via the following extracts from the dSSS:

Land north of Edinburgh Road and south of Smidmore Street and between Smidmore and Murray Street has potential for higher level employment uses, which could include retail, office or mixed use. This would support the Marrickville Metro Centre and encourage a redesign which better relates to the surrounding area." (Page 33 of dSSS)

The future role of Marrickville Metro....may change over the next 25 years. Currently, Marrickville Metro is identified as a village. There may be potential for retail/commercial floor space in addition to provision of higher density housing within the locality to achieve Town Centre status. (Page 68 of dSSS)

Council has sought that the dSSS be amended to identify Marrickville Metro as a 'Stand Alone Shopping Centre', and that references to Marrickville Metro and the surrounding area as a Village and potential future Town Centre be omitted. Council has also requested that the dSSS be amended so as to remove references to Marrickville Metro having the potential for expansion. The following reasons have been provided in support of Council's adopted position with regard to the Marrickville Metro:

- *under the Strategy's centre hierarchy, for Marrickville Metro to function as a Village there would need to be between 2,100 and 5,500 dwellings within a 600 metre radius of the centre. This would mean there would need to be significant new high density residential development in the precinct which is constrained by aircraft issues and does not benefit from proximity to a rail station;*
- *moreover, the draft Strategy identifies Marrickville Metro as a potential Town Centre which would mean achieving a target of between 4,500 and 9,500 dwellings within an 800 metre radius of the centre;*
- *the draft Strategy's support for the rezoning of Category 1 Industrial Land opposite the Marrickville Metro for a range of business uses (including retail) to permit the expansion*

and redesign of the shopping centre is contrary to the Strategy's objectives for protection of Category 1 Industrial Land;

- significant rezoning of other Category 1 Industrial Land in the vicinity of the Marrickville Metro would need to occur to achieve the housing targets identified for a Village or Town Centre; and*
- additional retail development associated with Marrickville Metro would compromise the economic viability of the LGA's traditional retail strips.*

In discussions with the Department of Planning on this matter, Council officers have submitted that in order to create a Village or Town Centre surrounding the Metro there is a need for additional dwellings as opposed to increased retail floor space and that this could be achieved with a cap on additional retail floor space in order to protect other local centres. In this respect, the current proposal reinforces the role of the Metro as a Stand Alone Shopping Centre and does little to contribute to the attainment of Village or Town Centre status.

In resolving the future role of the Metro and environs, the recommendations of the Marrickville Employment Lands Study (MELS) 2008 should also be considered. The MELS was prepared using Planning Reform Funds and undertaken by SGS Economics and Planning under the direction of Marrickville Council and the Department. Specifically, the MELS identified the Marrickville 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.

The benefits of a new or relocated rail station closer to the Bedwin Road bridge was recommended for investigation to inform any consideration by the Department of Planning of the expansion of the Marrickville Metro or for the shopping centre and environs to function as a new centre. To assist with this, enclosed are extracts from the MELS which indicate how an expansion of retail and commercial activities as part of a new centre in this area could proceed. Notably, any expansion is focussed on different land to that which the current Major Project proposal relates. The DGR's should require consideration to be given to whether the Edinburgh Road land that is subject to the current proposal is appropriate given the recommendations of the MELS and the potential for the area to function as a centre in the future.

Correspondence to Council from the Minister for Planning dated 27 July 2009 advised as follows concerning the Marrickville Metro shopping centre and its potential expansion:

In relation to Marrickville Metro Shopping Centre, the Department is in the process of reviewing the draft South Subregional Strategy. Marrickville Council has made a submission in response to the public exhibition of the Draft Subregional Strategy in which the Council requested the Metro Centre be identified as a standalone centre rather than a Village. The Council has also raised this issue in discussions with the Department on the preparation of its new Comprehensive LEP. The Department will take the Council's views into consideration as part of the strategic planning for the subregion.

The most recent discussions with the Department of Planning concerning the finalisation date for the draft Subregional Strategies have indicated that this is unlikely to be until late 2010.

The final DGRs were issued on 3 March 2010 and key issue 5, on strategic land use issues required the applicants to:

address the relevant metropolitan, regional and local strategies in relation to the desired future mix of landuses, and provide a justification for the amount of retail floorspace being proposed.

The EA on the Metro provides a detailed commentary on 'NSW State Plan 2010 and Urban Transport Statement 2006'; 'Sydney Metropolitan Strategy (2005)'; 'Draft South Subregional Strategy (2007)'; 'Draft Centres Policy (2009)'; 'Marrickville Urban Strategy (2007)'; 'Marrickville

Employment Land Study'; Marrickville Integrated Transport Strategy'; and 'NSW Planning Guidelines for Walking and Cycling'.

However the EA fails to address the key strategic land uses issues raised in Council's submission on draft DGRs dated 5 February 2010; namely:

- 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.
- Responding to the MUS, the EA states:

As the Marrickville Metro Precinct was removed as an 'Investigation Area' from the Marrickville Urban Strategy, no consideration is given to the potential of the land to be redeveloped to create additional employment (and/or housing) opportunities.

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.

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 submission.

Marrickville Action Plans for Urban Centres 2009 (Action Plan)

The *Marrickville Action Plans for Urban Centres 2009* (Action Plan) was prepared by SGS Planning and Economics, to provide a three year strategic framework for the Marrickville Independent Urban Centre Organisation (IUCO), Petersham Urban Centres Committee (UCC) and Dulwich Hill UCC. The strategies in the Action Plan were developed from an extensive SWOT (strengths, weaknesses, threats and opportunities) analysis. The Action Plan supports the directions of the dSSS and MELS and recommends that any expansion of the Metro should be part of strategic intensification of this area. The Action Plan states:

Business owners believe that the Marrickville Metro development has resulted in a considerable loss of retail business activity in other centres, with significant impacts for the Urban Centres over time. However, this impact was considered higher for the Marrickville and Petersham centres in consultation. As a result there is a suggestion from these stakeholders that increases in retail floorspace at Marrickville Metro should not be supported. A detailed economic impact assessment would be required to fully understand any impact that an expanded Marrickville Metro may have on the other centres in the LGA. SGS has undertaken some previous analysis of the LGA's employment lands and recommended that any expansion of Marrickville Metro should be part of a strategic intensification of this area which includes higher density residential development and improved public transport links.

The Action plan does not support the expansion of retail floor area over industrial lands and states:

Business operators were also critical of retail uses on industrial land, particularly activities of wholesale specialist food grocers. These are thought to take business away from the centre as wholesale operators benefit from cheaper rent on industrial land. Strict enforcement of the prohibition of retail activity in industrial areas was sought.

The supply and demand analysis found that there is not significant demand for additional retail and commercial floorspace capacity in the Urban Centres. This is due to the low level of growth expected in retail and associated sectors to 2031 and significant existing floorspace capacity in the Centres.

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 any expansion of the Metro on adjoining industrial land at 13 – 55 Edinburgh Road, Marrickville be suspended until the broader strategic land use issues in the area are resolved.

Council through this submission acknowledges that 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. However, 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.

Ecologically Sustainable Development (ESD) issues

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 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. There is no mention of embodied energy in the EA in terms of the construction and choice of building material.

The EA makes no references to innovations in energy generation – for example tri/co-generation 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. 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.

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. 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 have not been explored.

Traffic and transport issues

Transport and Urban Planning (TUP) was appointed by Council to undertake a review of the Traffic Management and Accessibility Plan (TMAP) for the Metro. While the review has generally supported the findings of the TMAP; the following issues have been raised:

- The TMAP does not provide a proper assessment of the Option 2; where Smidmore Street will remain open for vehicular traffic.
- 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.
- 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.

- To mitigate the intersection performance at Edgware/ 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.
- 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.
- Proposed changes to bus operations (i.e. bus stops and re routing) are dependent on agreement being obtained from Sydney Buses. The proposed roundabout design at Edinburgh Road /Sydney Steel Road:
 - 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.
- 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. 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.
- Issues concerning proposed bicycle routes are as follows:
 - 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.
 - Regional Cycle Route No. 5 (stage 2) has been omitted from any proposed works. This is an important regional cycle route to the Metro.
- 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. In addition, an anomaly which is shown in Figure 10, is new traffic signals at the intersection of Edgware Road and Victoria Road. This improvement is not listed in the body of the report and requires clarification as whether or not it is proposed as part of the TMAP.
- Dates on which traffic surveys were undertaken have not been identified in the report. The potential influence of seasonal fluctuations in traffic volumes can therefore not be determined.
- The TMAP refers to Edgware 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.
- 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.
- The proposal to divert traffic and bus routes along the Edgware Road extension through the Bedwin Road underpass is not supported. The geometry of the Edgware 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.
- 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 siting of a pedestrian refuge on Edgware Road, south east of Smidmore Street raises safety concerns due to its proximity to an "S" Bend on Edgware Road which limits sight distance for pedestrians and traffic.
- 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.

- Measures proposed throughout the study will potentially have impacts on the availability of on street parking. This needs to be quantified and assessed.
- 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.

In summary, the TMAP relies on a number of unsubstantiated assumptions and therefore requires further analysis to gauge the full impacts of the proposed redevelopment of the Metro on local traffic. The TMAP fails to analyse different possible scenarios such as Option 2; or if Sydney Buses do not support the proposal to relocate the bus routes from Smidmore Street to Edgeware Road.

Accordingly, until these issues are fully considered and resolved, the development could not be supported on traffic management and accessibility related issues.

A copy of the TUP report is included at **ATTACHMENT 8**.

Heritage and urban design issues

Council's Heritage and Urban Design Adviser has provided the following comments:

Description:

The existing building on site provides almost no pedestrian interactive edges, it is a walled compound predominantly accessed by car. At street level, the only obvious entry points are driveways. The only two pedestrian entries (at Smidmore Street, and behind the Mill House on Victoria Road) are both unsigned and visually and operationally insignificant. The overwhelming focus is on the car park entries which are easily identified by prominent signage. The predominant aesthetic on Smidmore and Murray Streets is blank concrete panel walling, ramps and loading docks. The site is dominated on these edges by the manoeuvring and parking of cars and trucks - it therefore makes a negative contribution to the life of these streets. Victoria Street is presented with a smaller scale: the older walled edge of the previous Vicar's Mill warehouse with some pedestrian level signage, the pedestrian forecourt around the Mill House, the wide paved footpath, and some established gardens and tree canopy. The quality of the space is assisted by the northern aspect, minimal traffic due to closure of one end of the road, and the residential scale opposite providing a more human scale. The amenity on Victoria Road (currently an Amendment 1 Area, and a proposed Heritage Conservation Area) should not be diminished by the development.

Proposed

Pedestrian conditions at street level

*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. 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. Clause 6.5 of the Conservation Management Plan for the Mill House (Graham Brooks & Assoc 2007) says: "Future changes to the shopping centre should not visually dominate the Mill House", and Clause 6.3 "The existing form of the building (Mill House) is to be retained and conserved". 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 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 busses. The Edinburgh Road Entry appears very cramped. 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. Removal of street trees would have a considerable negative impact.

Driveways

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.

Bulk and Setbacks

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.

Built form and streetscape related issues

Council's Manager, Development Assessment has provided the following comments on built form and scale of the proposed redevelopment of the Metro:

- 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.
- 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, noting that all the existing mature trees in the north-east corner adjoining Murray Street appear to be identified for removal. 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.
- A similar comment is made about the proposed "corkscrew" shaped ramp on the corner of Smidmore Street and Edinburgh Road in the new section of the development, which will also be visually prominent, and is considered to have little design or streetscape merit.
- 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.
- 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. Council would prefer a detailed coherent external treatment and complementary signage strategy to be developed.
- 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.
- 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 at night regardless of the recommendations on the Acoustic Logic report. Traffic routes for all deliveries should also be identified as the area is enclosed on 3 sides by residential uses.

Local flooding issues

Council's Development Control Engineer has reviewed the Hydrology Report prepared by Golder Associates and provided the following comments:

- 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.*
- 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.*
- 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.*
- 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.*

Existing trees and landscaping issues

Council's Parks and Reserves Services has reviewed the proposal and provided the following comments on proposed removal of trees and aspects of landscaping in the vicinity of the proposed development:

- The removals of the *Corymbia citriodora* (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.*
- 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.*
- Council does not support works that are likely to have a detrimental impact on mature healthy trees with high landscape significance.*
- 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.*
- Council does not support works that will detrimentally impact the health and viability of trees 82, 83 and 84.*
- 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.*
- Resourcing of the required maintenance of the raingardens is a concern to Council. Without sufficient maintenance these structures may not function correctly.*

- *Street tree species selection for each of the street frontages is to be undertaken in consultation and in agreement with Marrickville Council. The selection of Eucalyptus paniculata (Grey Ironbark) is not 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.*

Submissions

Council has received copies of eight submissions from local residents objecting to the proposed expansion of the Metro. The Marrickville Chamber of Commerce has also advised that a petition signed by 4,000 persons opposing the proposed expansion of the Metro, has been received. All submitters have been advised to lodge their submissions with the DoP for consideration as part of its assessment of the proposed development and informed of reporting of this matter to Council.

CONCLUSION

This submission has provided an evaluation of the proposed redevelopment of the Marrickville Metro Shopping Centre.

Through this submission, Council opposes the proposed expansion of the Marrickville Metro Shopping Centre and requests that an independent hearing and assessment panel (IHAP) be established to consider all aspects of the proposed redevelopment.

This submission considers that in the absence of the resolution of the strategic land use directions for the site and surrounds any redevelopment of the Metro and its immediate surroundings would not achieve the orderly and economic development of the area.

Any expansion of the Metro must be limited to the existing footprint of the centre notwithstanding the other impacts of the proposal as highlighted in this submission.

Should the development be approved by the DoP, the impacts of the proposed redevelopment on existing retail strips could also be minimised by restricting any new floor space to large retailers such as supermarkets and department stores with no additional floor space provided for smaller scale speciality retail.

Council through this submission acknowledges that 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. However, 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.

The Traffic Management and Accessibility Plan (TMAP), as submitted by the applicant, relies on a number of unsubstantiated assumptions and therefore requires further analysis to gauge the full impacts of the proposed redevelopment of the Metro on local traffic. The TMAP fails to analyse different possible scenarios such as Option 2; or if Sydney Buses do not support the proposal to relocate the bus routes from Smidmore Street to Edgeware Road.

ATTACHMENTS 1 & 2



Planning



27 January 2010

Contact: Andrew Smith
Phone: (02) 9228 6369
Fax: (02) 9228 6540
Email:
Andrew.Smith@planning.nsw.gov.au

Our ref: MP09_0191
File: 09/02054

Ms Kim Anson
General Manager
Marrickville Council
PO Box 14
Petersham NSW Australia 2049

Dear Ms Anson,

**REQUEST FOR PROVISION OF KEY ISSUES AND ASSESSMENT REQUIREMENTS –
CONCEPT PLAN FOR PROPOSED RETAIL EXPANSION, MARRICKVILLE METRO 34
VICTORIA ROAD, 13-55 EDINBURGH ROAD AND PART OF SIDMORE STREET (MP
09_0191)**

The Department has received an application from Urbis Pty Ltd on behalf of AMP Capital Investors, pursuant to Part 3A of the *Environmental Planning and Assessment Act 1979* (the Act).

The Concept Plan involves the development of approximately 32,505m² of additional retail floor space to Marrickville Metro and associated roof level and partial basement parking. Further information regarding the proposal can be found in the attached Preliminary Environmental Assessment Report, prepared by the Proponent.

Pursuant to Section 75F (4) of the Act, the Director-General requests you to provide details of key issues and assessment requirements which may be included in the Director-General's Environmental Assessment Requirements (DGRs). To assist you, a copy of the draft DGRs has been provided (attached).

The provision of key issues and assessment requirements would be appreciated as soon as possible but no later than **10 days** from the date of this letter.

Should you have any enquires relating to this matter, please contact Andrew Smith on (02) 9228 6369 or via e-mail to Andrew.Smith@planning.nsw.gov.au.

Yours sincerely,

Michael Woodland
Director, Metropolitan Projects



Planning

Draft Director-General's Requirements Section 75F of the Environmental Planning and Assessment Act 1979

Application number	MP 09_0191
Project	Application for a Concept Plan for the retail expansion at Marrickville Metro.
Location	34 Victoria Road, 13-55 Edinburgh Road and a portion of Smidmore Street
Proponent	Urbis Pty Ltd on behalf of AMP Capital Investors Pty Ltd
Date issued	
Expiry date	If the Environmental Assessment (EA) is not exhibited within 2 years after the date of issue, the applicant must consult further with the Director-General in relation to the preparation of the environmental assessment.
Key issues	<p>The Environmental Assessment (EA) must address the following key issues:</p> <p>1. Relevant EPI's policies and Guidelines to be Addressed Planning provisions applying to the site, including permissibility and the provisions of all plans and policies including:</p> <ul style="list-style-type: none"> • Objects of the EP&A Act 1979; • NSW State Plan, Urban Transport Statement; • Sydney Metropolitan Strategy; • Draft Centres Policy; • Draft South Subregional Strategy; • Marrickville Local Environmental Plan 2001, Draft Marrickville Local Environmental Plan 2010 and relevant Development Control Plans; • SEPP 55 Remediation of Land; and • Draft SEPP 66 Integration of Land Use and Transport; • Nature and extent of any non-compliance with relevant environmental planning instruments, plans and guidelines and justification for any non-compliance. <p>2. Built Form Urban Design/Public Domain The EA shall address the height, bulk and scale of the proposed development within the context of the locality. In particular, detailed envelope/height and contextual studies should be undertaken to ensure the proposal integrates with the local environment.</p> <p>The EA shall address the design quality with specific consideration of the façade, massing, setbacks, building articulation, use of appropriate colours, materials/finishes, landscaping, safety by design and public domain, including an assessment against the CPTED Principles.</p> <p>A key desired outcome is a high quality public domain along Smidmore Road, Victoria Street and Murray Street and the EA should present strategies for the successful integration of public and private open space.</p> <p>The EA shall provide the following documents:</p> <ul style="list-style-type: none"> • Comparable height study to demonstrate how the proposed height relates to the height of the existing/approved developments surrounding the subject site and in the locality;

- Description of the Concept Plans proposed schemes, the Preferred Option and the Bridging Option and the impact they will have on the proposals outcome.
- View analysis to and from the site from key vantage points; and
- Options for building envelopes, massing and articulation, with particular consideration given to the integration of the public domain along Smidmore Road, Victoria Street and Murray Street.

3. Staging

The EA must include details regarding the staging of the proposed development (if proposed).

4. Land Use

The EA shall address the relevant regional and local strategies in relation to the desired future mix of landuses, and provide a justification for the amount of residential floorspace being proposed.

5. Transport & Accessibility Impacts (Construction and Operational)

The EA shall address the following matters:

- Provide a Transport & Accessibility Impact Study prepared in accordance with the RTA's *Guide to Traffic Generating Developments*, considering traffic generation (including daily and peak traffic movements), any required road / intersection upgrades, access, loading dock(s), car parking arrangements, measures to promote public transport usage and pedestrian and bicycle linkages;
- Provide an assessment of the implications of the proposed development for non-car travel modes (including public transport, walking and cycling), including an assessment of existing and proposed pedestrian and cycle movements within the vicinity of the subject site, and possible linkage to the "Rail Trail Shared Use Path Cycle/Pedestrian Route" which runs along the rail corridor;
- Demonstrate that a minimalist approach to carparking provision is taken based on the accessibility of the site to public transport;
- Demonstrate how users of the development will be able to make travel choices that support the achievement of relevant State Plan targets;
- Details of service vehicle movements; and
- Consideration into a one way internal road system.

6. Environmental and Residential Amenity

The EA must address solar access, acoustic privacy, visual privacy, view loss and wind impacts and achieve a high level of environmental and residential amenity.

7. Car parking

The EA must demonstrate the provision of sufficient on-site car parking for the proposal having regard to local planning controls and RTA guidelines. (**Note:** the Department supports reduced car parking rates in areas well-served by public transport).

8. Ecologically Sustainable Development (ESD)

The EA shall detail how the development will incorporate ESD principles in the design, construction and ongoing operation phases of the development.

In particular, the EA must consider Council's minimum energy performance,

	<p>water use and stormwater quality standards of the Marrickville Stormwater and On Site Detention Code. In addition, a minimum rating of 4.0 stars equivalent to the industry accepted Green Star Multi Residential Pilot Tool of the Green Building Council is encouraged for the category of development.</p> <p>9. Contributions The EA shall address the provision of public benefit, services and infrastructure having regard to Council's Section 94 Contribution Plan, and provide details of any Planning Agreement or other legally binding instrument proposed to facilitate this development.</p> <p>10. Consultation Undertake an appropriate and justified level of consultation in accordance with the Department's <i>Major Project Community Consultation Guidelines October 2007</i>.</p> <p>11. Drainage The EA shall address drainage / groundwater / flooding issues associated with the development / site, including stormwater, drainage infrastructure and incorporation of Water Sensitive Urban Design measures.</p> <p>12. Groundwater The EA is to identify groundwater issues and potential degradation to the groundwater source and shall address any impacts upon groundwater resources, and when impacts are identified, provide contingency measures to remediate, reduce or manage potential impacts.</p> <p>The EA shall also address whether a licence is required under Part 5 of the Water Act 1912.</p> <p>13. Utilities In consultation with relevant agencies, address the existing capacity and requirements of the development for the provision of utilities including staging of infrastructure works.</p> <p>14. Noise and Vibration Assessment The EA should address the issue of noise and vibration impact from the railway corridor and provide detail of how this will be managed and ameliorated through the design of the building, in compliance with relevant Australian Standards and the Department's <i>Interim Guidelines for Development near Rail Corridors and Busy Roads</i>.</p> <p>15. Statement of Commitments The EA must include a draft Statement of Commitments detailing measures for environmental management, mitigation measures and monitoring for the project.</p>
Deemed refusal period	60 days

Plans and Documents to accompany the Application

General	<p>The Environmental Assessment (EA) must include:</p> <ol style="list-style-type: none"> 1. An executive summary; 2. A thorough site analysis including site plans, areal photographs and a description of the existing and surrounding environment; 3. A thorough description of the proposed development; 4. An assessment of the key issues specified above and a table outlining how these key issues have been addressed; 5. An assessment of the potential impacts of the project and a draft Statement of Commitments, outlining environmental management, mitigation and monitoring measures to be implemented to minimise any potential impacts of the project; 6. The plans and documents outlined below; 7. A signed statement from the author of the Environmental Assessment certifying that the information contained in the report is neither false nor misleading; 8. A Quantity Surveyor's Certificate of Cost to verify the capital investment value of the project (in accordance with the definition contained in the Major Projects SEPP); and 9. A conclusion justifying the project, taking into consideration the environmental impacts of the proposal, the suitability of the site, and whether or not the project is in the public interest.
Plans and Documents	<p>The following plans, architectural drawings, diagrams and relevant documentation shall be submitted;</p> <ol style="list-style-type: none"> 1. An existing site survey plan drawn at an appropriate scale illustrating: <ul style="list-style-type: none"> • the location of the land, boundary measurements, area (sq.m) and north point; • the existing levels of the land in relation to buildings and roads; • location and height of existing structures on the site; • location of existing trees; • location and height of adjacent buildings and private open space; and • all levels to be to Australian Height Datum. 2. A Site Analysis Plan must be provided which identifies existing natural elements of the site (including all hazards and constraints), existing vegetation, footpath crossing levels and alignments, existing pedestrian and vehicular access points and other facilities, slope and topography, utility services, boundaries, orientation, view corridors and all structures on neighbouring properties where relevant to the application (including windows, driveways, private open space etc). 3. A locality/context plan drawn at an appropriate scale should be submitted indicating: <ul style="list-style-type: none"> • significant local features such as parks, community facilities and open space and heritage items; • the location and uses of existing buildings, shopping and employment areas; • traffic and road patterns, pedestrian routes and public transport nodes. 4. Architectural drawings at an appropriate scale illustrating: <ul style="list-style-type: none"> • the location of any existing building envelopes or structures on the land in relation to the boundaries of the land and any development on

	<ul style="list-style-type: none"> adjoining land; detailed floor plans, sections and elevations of the proposed buildings; elevation plans providing details of external building materials and colours proposed; fenestrations, balconies and other features; accessibility requirements of the Building Code of Australia and the Disability Discrimination Act; the height (AHD) of the proposed development in relation to the land; the level of the lowest floor, the level of any unbuilt area and the level of the ground; and any changes that will be made to the level of the land by excavation, filling or otherwise. <p>5. Other plans (to be required where relevant):</p> <ul style="list-style-type: none"> Stormwater Concept Plan - illustrating the concept for stormwater management; Erosion and Sediment Control Plan – plan or drawing that shows the nature and location of all erosion and sedimentation control measures to be utilised on the site; Geotechnical Report – prepared by a recognised professional which assesses the risk of Geotechnical failure on the site and identifies design solutions and works to be carried out to ensure the stability of the land and structures and safety of persons; View Analysis - Visual aids such as a photomontage must be used to demonstrate visual impacts of the proposed building envelopes in particular having regard to the siting, bulk and scale relationships from key areas; Landscape plan - illustrating treatment of open space areas on the site, screen planting along common boundaries and tree protection measures both on and off the site. Shadow diagrams showing solar access to the site and adjacent properties at summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00 am, 12.00 midday and 3.00 pm. <p>6. A massing model of the proposed development for the entire site (i.e. Concept Plan).</p>
Documents to be submitted	<ul style="list-style-type: none"> 1 copy of the EA, plans and documentation for the Test of Adequacy (TOA); Once the EA has been determined adequate and all outstanding issues adequately addressed, 12 copies of the EA for exhibition; 12 sets of architectural and landscape plans to scale, including one (1) set at A3 size (to scale); and 12 copies of the Environmental Assessment and plans on CD-ROM (PDF format), each file not exceeding 5Mb in size. <p>NOTE: All files must be titled and saved in such a way that it is clearly recognisable without the file being opened. If multiple PDF's make up one document/report each must be titled in sequential order.</p>

3415-MR
mp09-0191

5 February, 2010

Michael Woodland
Director, Metropolitan Projects
NSW Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Mr Woodland

**KEY ISSUES AND ASSESSMENT REQUIREMENTS – CONCEPT PLAN FOR PROPOSED
RETAIL EXPANSION, MARRICKVILLE METRO 34 VICTORIA ROAD, 13-55 EDINBURGH
ROAD AND PART OF SMIDMORE STREET (MP09_0191)**

I refer to the Department's recent correspondence concerning the above application under Part 3A of the *EP&A Act 1979*.

Council officers have reviewed the preliminary environmental assessment prepared by the proponent and provide the following comments to assist the Department in determining the key issues and assessment requirements for inclusion in the DGR's.

Land use issues

In relation to key issue 4 in the draft DGRs, Council's position concerning any expansion of the Marrickville Metro shopping centre was established by the adoption of the Marrickville Urban Strategy (MUS) and its consideration of the draft South Subregional Strategy (dSSS) at its May 2008 Development and Environmental Services Committee meeting. This position is that the expansion of the shopping centre could have a detrimental impact on the viability of the existing shopping strips in the LGA.

In this context, despite the dSSS acknowledging the difficulties being experienced by businesses on Marrickville Road (SO B3.2.3, Page 71 dSSS), the dSSS promotes the Metro's expansion onto the Edinburgh Road properties owned by the proponent via the following extracts from the dSSS:-

"Land north of Edinburgh Road and south of Smidmore Street and between Smidmore and Murray Street has potential for higher level employment uses, which could include retail, office or mixed use. This would support the Marrickville Metro Centre and encourage a redesign which better relates to the surrounding area." (Page 33 of dSSS)

"The future role of Marrickville Metro....may change over the next 25 years. Currently, Marrickville Metro is identified as a village. There may be potential for retail/commercial floor space in addition to provision of higher density housing within the locality to achieve Town Centre status." (Page 68 of dSSS)

Council has sought that the dSSS be amended to identify Marrickville Metro as a 'Stand Alone Shopping Centre', and that references to Marrickville Metro and the surrounding area as a

Village and potential future Town Centre be omitted. Council has also requested that the dSSS be amended so as to remove references to Marrickville Metro having the potential for expansion. The following reasons have been provided in support of Council's adopted position with regard to the Marrickville Metro:

- *under the Strategy's centre hierarchy, for Marrickville Metro to function as a Village there would need to be between 2,100 and 5,500 dwellings within a 600 metre radius of the centre. This would mean there would need to be significant new high density residential development in the precinct which is constrained by aircraft issues and does not benefit from proximity to a rail station;*
- *moreover, the draft Strategy identifies Marrickville Metro as a potential Town Centre which would mean achieving a target of between 4,500 and 9,500 dwellings within an 800 metre radius of the centre;*
- *the draft Strategy's support for the rezoning of Category 1 Industrial Land opposite the Marrickville Metro for a range of business uses (including retail) to permit the expansion and redesign of the shopping centre is contrary to the Strategy's objectives for protection of Category 1 Industrial Land;*
- *the Category 1 Industrial Land referred to above is identified as appropriate for other land uses whilst other land within the precinct that is less suited to the freight and logistics roles (such as Meeks Road) identified for the precinct are required to remain as Category 1 Industrial Land;*
- *significant rezoning of other Category 1 Industrial Land in the vicinity of the Marrickville Metro would need to occur to achieve the housing targets identified for a Village or Town Centre; and*
- *additional retail development associated with Marrickville Metro would compromise the economic viability of the LGA's traditional retail strips.*

In discussions with the Department of Planning on this matter, Council officers have submitted that in order to create a Village or Town Centre surrounding the Metro there is a need for additional dwellings as opposed to increased retail floor space and that this could be achieved with a cap on additional retail floor space in order to protect other local centres. In this respect, the current proposal reinforces the role of the Metro as a Stand Alone Shopping Centre and does little to contribute to the attainment of Village or Town Centre status.

In resolving the future role of the Metro and environs, the recommendations of the Marrickville Employment Lands Study (MELS) 2008 should also be considered. The MELS was prepared using Planning Reform Funds and undertaken by SGS Economics and Planning under the direction of Marrickville Council and the Department. Specifically, the MELS identified the Marrickville 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.

The benefits of a new or relocated rail station closer to the Bedwin Road bridge was recommended for investigation to inform any consideration by the Department of Planning of the expansion of the Marrickville Metro or for the shopping centre and environs to function as a new centre. To assist with this, enclosed are extracts from the MELS which indicate how an expansion of retail and commercial activities as part of a new centre in this area could proceed. Notably, any expansion is focussed on different land to that which the current Major Project proposal relates. The DGR's should require consideration to be given to whether the Edinburgh Road land that is subject to the current proposal is appropriate given the recommendations of the MELS and the potential for the area to function as a centre in the future.

Correspondence to Council from the Minister for Planning dated 27 July, 2009 advises as follows concerning the Marrickville Metro shopping centre and its potential expansion:

In relation to Marrickville Metro Shopping Centre, the Department is in the process of reviewing the draft South Subregional Strategy. Marrickville Council has made a submission in response to the public exhibition of the Draft Subregional Strategy in which the Council requested the Metro Centre be identified as a standalone centre rather than a Village. The Council has also raised this issue in discussions with the Department on the preparation of

its new Comprehensive LEP. The Department will take the Council's views into consideration as part of the strategic planning for the subregion.

The most recent discussions with the Department of Planning concerning the finalisation date for the draft Subregional Strategies have indicated that this is unlikely to be until mid 2010.

Accordingly, as this Major Project application is pre-empting the orderly resolution of strategic land use issues through the draft South Subregional Strategy, which is seemingly contrary to the Minister's July 2009 advice, it is appropriate that the DGR's require the abovementioned strategic land use issues to be addressed. Failure to resolve these issues as part of the current Part 3A process may lead to less than optimal land use planning and transport outcomes.

Draft Marrickville LEP 2010

The draft DGRs require consideration of the planning controls for the subject land in the draft MLEP 2010.

Under the draft Marrickville LEP 2010 (currently with the Department for pre section 64 consideration) planning controls which are generally equivalent to those which currently apply under Marrickville Local Environmental Plan 2001 apply to the shopping centre. Accordingly, the B2 Local Centre zone has been applied to the site. The FSR for the site on the FSR Map is 0.75:1. This is less than the current 0.80:1 in the MLEP 2001 which is intended to maintain parity with the current FSR under the revised definition of gross floor area in the Standard LEP.

The relevant parts of Smidmore Street and 13-55 Edinburgh Road are proposed to be zoned IN1 General Industrial.

Section 94 contributions, Voluntary Planning Agreement and closure of Smidmore Street

The DGRs should require the Concept Plan to address the following matters:

- The level of Section 94 contributions that the development will be subject to under Council's existing contributions plans;
- The range of alternative contributions that may be appropriate via a Voluntary Planning Agreement (VPA); and
- The process for further consideration by all stakeholders of the incorporation of part of Smidmore Street into the proposed development.

Council is likely to be interested in engaging in further discussions with the proponent during the preparation of the Concept Plan concerning the above matters, in particular the options concerning Smidmore Street and the potential for a VPA.

Traffic and access

In addition to the transport and accessibility requirements in the draft DGRs, the proponent should be required to provide/address the following:

- The extent of the study area for the "Traffic Impact Study" should be agreed with Council;
- The impacts of additional parking demand on on-street parking in surrounding/adjacent streets should be specifically addressed; and
- The level of public consultation with regards to any proposed traffic/parking changes/mitigation measures in surrounding/ adjacent streets should be determined in conjunction with Council.

Public transport, pedestrian and cycle networks

The Transport Management and Accessibility Plan (TMAP) for the proposal should be consistent with the NSW Government's TMAP Guidelines and the Improving Transport Choice guidelines. It should include mode shift targets toward sustainable transport, with a range of actions designed to achieve these targets.

Specific actions that should be evaluated include:

- Restricted provision, time regulation and pricing of car parking as a motor vehicle demand management measure;
- Priority parking to mobility pass holders, pram users, environmental and car share vehicles and higher occupancy vehicles;
- Developer contributions toward improved STA bus services and new shuttle bus service if appropriate;
- Development of a strategy to reduce the environmental impacts of delivery vehicle movements, such as use of smaller rigid trucks instead of semi-trailers;
- Subsidised home delivery and improved taxi pick-up and drop-off areas;
- Improvements to footways and cycling routes surrounding Metro;
- Development of a Workplace Travel Plan to facilitate a shift toward sustainable transport by Metro businesses and staff;
- Development and promotion of Transport Access Guide information designed to facilitate sustainable transport access to Metro;
- Provision of quality bicycle parking facilities of Metro staff and customers; and
- Retail incentives designed to promote sustainable transport, such as shopper rewards schemes for sustainable transport users and removal of petrol discounts.

Consideration should be given to the maintenance and possible upgrade of the current Neighbourhood Shopping Service, especially its pick up and sets down spots, that is operated by the Newtown Neighbourhood Centre. In addition, consideration should be given by the developer to supporting the establishment of a community transport service from the Dulwich Hill area to the Metro site, especially for frail aged and disabled people and mothers with young children on low incomes.

Scale and design

Redevelopment of the site should maximise opportunities to activate the street frontages to enhance the public domain and encourage/facilitate pedestrian movement in and around the site.

The scale, siting and massing of the buildings should be designed to improve the integration of the building into the streetscape. Any signs should be integrated into the architectural design and finishes to avoid an ad hoc approach to signage. If large areas of exposed blank walls are proposed they should be suitably designed/treated to discourage graffiti. A detailed schedule of finishes and colours should be submitted to enable a comprehensive assessment of the design merit of the proposal to be carried out.

Heritage

The Concept Plan will need to address environmental heritage issues at the site. MLEP 2001, Schedule 5 lists the Mill House at 34 Victoria Road, Marrickville as Heritage Item No. 2.105. It is also listed on the NSW Heritage Database, and the National Trust Register 1982. Conservation of the Item is required by MLEP 2001, Part 6, and the Heritage Act 1977.

MLEP 2001, Part 6 requires a Heritage Impact Statement for all Heritage Items. Any excavation on the site may require approval under the NSW Heritage Act 1977.

As one of the oldest surviving buildings in the district (C.1860) the treatment of the Mill House, within the context of expansion at the site, should be carefully considered. In that regard a suitably

qualified Conservation Architect should be engaged to inform the development proposal moving forward from the concept planning phase and into the design development stage. A qualified conservation architect should be required to provide an endorsement of the proposal.

An archival record of the Mill House and its existing context should be required prior to any changes in the vicinity of the Item.

Key issues for consideration are:

- Appropriate curtilage provisions around the item;
- Appropriate bulk, scale, form and material qualities of any new buildings on the site;
- Interpretation and site planning should enhance the embodied significance of the item, and not reduce, public awareness/accessibility;
- Any proposed change in use should consider heritage impacts to the building and site; and
- Any proposed alterations to the Mill House would require a Conservation Management Plan and the approval of the NSW Heritage Council under Part 2, Div 2, Sec 21 of the NSW Heritage Act 1977.

Community development considerations

The proposed development, should it be approved, would provide important opportunities to enhance community wellbeing alongside the provision of additional retail shopping services. Initiatives that would be encouraged are:

- Community facilities such as a small function room for community and civic use, meeting rooms for residents and community organisation use, a self help digital library service and a small gallery/artists studio/performance space;
- Open space, which encourages appropriate social meeting spaces for young people and general community use;
- A market area which could be used by local ethnic groups, local artists and other social enterprises;
- A commitment to provide job opportunities to local unemployed and underemployed people through a dedicated employment and training strategy in both the construction and operational stages; and
- Assistance with a local economic development plan to manage the negative economic impacts of the redevelopment on retail strip shopping centres, especially the Marrickville and Illawarra Roads centres.

It should be noted that the existing Metro supermarkets and some of the speciality shops offer prices for goods and services which are amongst the cheapest offered by large shopping centres across Sydney's inner West. Whilst gentrification will continue to occur in several parts of the Marrickville Council area over the next decade, increasing median incomes, there will remain a sizeable portion of the local population who will live on low or very low incomes (currently 25%). The developer should be encouraged to retain retail services in the redeveloped complex which can provide affordable prices to lower income households in Marrickville.

As the Marrickville area has a proud and robust tradition of public art being incorporated into major facilities and open space domains, the developer should be encouraged to incorporate significant public art into the redevelopment and work with the diverse range of creative industry local businesses and individual artists in the concept and delivery phases.

As noted above, the potential for a VPA to realise some of the abovementioned community and social infrastructure should be addressed in the Concept Plan..

Conclusion

The proposed expansion of the Marrickville Metro shopping centre is a major development that would have significant impacts on the local area and the Marrickville LGA. In order to minimise any negative impacts and promote positive outcomes for the community it is requested that the matters raised in this submission be addressed in the preparation of the Concept Plan for the site and environs. As indicated in this correspondence, Council is likely to be prepared to discuss the proposal with the proponent and seek to address key issues.

I trust this information is of assistance and should you have further enquiries please contact Marcus Rowan, Manager Planning Projects on 9335 2274.

Yours sincerely

Ken Hawke
Director, Development and Environmental Services

Encl. Extracts from the Marrickville Employment Lands Study, 2008

ATTACHMENTS 3 to 7

OUR REF: 3415

YOUR REF:

27 July 2010

The Hon. Tony Kelly, MP
Minister for Planning, Minister for Infrastructure
and Minister for Lands
Level 34 Governor Macquarie Tower
1 Farrer Place
Sydney NSW 2000

Dear Minister Kelly

**Marrickville Metro Shopping Centre Redevelopment
Concept Plan Application under Part 3A of the Environmental Planning and
Assessment Act 1979**

An Environmental Assessment Report, prepared on behalf of AMP Capital Investors (AMPCI), to accompany a Concept Plan Application under Part 3A of the Environmental Planning and Assessment Act 1979 has recently been forwarded to Council for the redevelopment of the Marrickville Metro Shopping Centre.

The Executive Summary submitted describes the proposal as follows:

"The Concept Plan proposal is for the development of Marrickville Metro Shopping Centre including:

- An extension of retail floor area at first floor level above the existing shopping centre building with further additional roof top parking above;*
- The redevelopment of the existing industrial land south of Smidmore Street (13-55 Edinburgh Road) to create a two level retail addition to the shopping centre with car parking above.*
- The closure of Smidmore Street between Edinburgh Road and Murray Street in order to create a new pedestrian plaza including a two storey retail link and car parking access. This aspect of the proposal is subject to the agreement of Marrickville Council to close and sell that part of Smidmore Street to AMPCI. A separate development option has been prepared retaining Smidmore Street in situ if required.*

The proposed development has a construction investment value of \$165 million."

At its meeting on 20 July 2010, Council resolved:

To write to the Minister for Planning and the local State Member requesting that the Metro development be handed back to the local Council (as elected by the residents) for determination.

At the same meeting Council also resolved that:

In view of the size and nature of the proposal, it is considered that Council should request the Director General of the Department of Planning to extend the public exhibition period for the proposal to a minimum of 60 days.

Correspondence has been forwarded to the Director General of the Department of Planning concerning the second resolution.

Should your office have any questions in relation to this matter please contact Council's Manager Planning Services, Marcus Rowan on 9335 2274.

Yours faithfully

Ken Gainger
General Manager

OUR REF: 3415
YOUR REF:

27 July 2010

The Hon. Carmel Tebbutt, MP
Deputy Premier
Minister for Health
244 Illawarra Road
Marrickville NSW 2204

Dear Ms Tebbutt

**Marrickville Metro Shopping Centre Redevelopment
Concept Plan Application under Part 3A of the Environmental Planning and
Assessment Act 1979**

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Should your office have any questions in relation to this matter please contact Council's Manager Planning Services, Marcus Rowan on 9335 2274.

Yours faithfully

Ken Gainger
General Manager

OUR REF: 3415
YOUR REF:

27 July 2010

Sam Haddad
Director General
Department of Planning
PO Box 39
Sydney NSW 2001

Dear Mr Haddad

**Marrickville Metro Shopping Centre Redevelopment
Concept Plan Application under Part 3A of the Environmental Planning and
Assessment Act 1979**

An Environmental Assessment Report, prepared on behalf of AMP Capital Investors (AMPCI), to accompany a Concept Plan Application under Part 3A of the Environmental Planning and Assessment Act 1979 has recently been forwarded to Council for the redevelopment of the Marrickville Metro Shopping Centre.

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The proposed development has a construction investment value of \$165 million."

The Department of Planning's "Guidelines for Major Project Community Consultation sets out the consultation requirements to be undertaken by the proponent for the project

for which it is seeking approval. This is done through the Director-General's requirements (DGRs) for the proponent's environmental assessment.

Under the Guidelines:

"Once the Department considers a proponent's environmental assessment for a major project or concept plan to be adequate, it must be publicly exhibited for a minimum of 30 days inviting the community to make submissions. An advertisement is placed in relevant newspapers informing the community that the project is on exhibition, providing an officer contact name for the project and informing them where to send their submissions. The environmental assessment is also placed on the Department's website along with other relevant documentation".

In view of the above, Council at its meeting on 20 July 2010, resolved to request that the Department of Planning extend the exhibition period for the proposal from the 30 days minimum to 60 days. This will ensure that Council and the community has sufficient time to make submissions regarding the redevelopment.

Should these timeframes be unsatisfactory for the Department it is requested that Council be given to until 8 September 2010 in which to lodge the submission. This will enable officers to work within Council's committee reporting timeframes. In this respect, AMPCI has advised that to achieve its program, the latest it could receive Council's submission is 8 September 2010.

For further questions in relation to the issue raised please contact Marcus Rowan, Manager Planning Services on 9335 2274.

Yours sincerely

Ken Hawke
Director, Development & Environmental Services

OUR REF: 3415/52021.10
YOUR REF:

18 August 2010

Sam Haddad
Director General
Department of Planning
PO Box 39
Sydney NSW 2001

Dear Mr Haddad

**Marrickville Metro Shopping Centre Redevelopment
Concept Plan Application under Part 3A of the Environmental Planning and
Assessment Act 1979**

Further to Council's letter of 27 July 2010 (copy attached), please be advised that the Marrickville Chamber of Commerce has commissioned independent studies on the strategic planning, economic and traffic aspects of the Part 3A redevelopment proposal for the Marrickville Metro Shopping Centre.

In view of the above, Council at its meeting on 17 August 2010, resolved to renew its previous request that the Department of Planning extend the exhibition period for the proposal from the 30 days minimum to 60 days. This will ensure that Council and the Chamber of Commerce have sufficient time to make detailed submissions regarding the proposed development.

For further information in relation to this matter please contact Marcus Rowan, Manager Planning Services on 9335 2274.

Yours sincerely

Ken Hawke
Director, Planning & Environmental Services



Planning

Contact: Andrew Beattie
Phone: 02-9228-6384
Fax: (02) 9228 6455
Email: Andrew.Beattie@planning.nsw.gov.au

Mr Ken Gainger
The General Manager
Marrickville Council
PO Box 14
Petersham NSW 2049

Our ref.: MP09_0191

Dear Mr Gainger

Subject: Exhibition of Environmental Assessment for Marrickville Metro Shopping Centre (MP09_0191)

I refer to your recent correspondence regarding the Part 3A project MP09_0191 for expansion of the Marrickville Metro Shopping Centre.

In response to Council's and community interest, the Department of Planning has extended the normal 30 day exhibition period for an additional 2 weeks until **Friday 10 September 2010** to allow interested parties further time to make a submission.

All submissions will be carefully considered by the Department prior to determination of the application.

I have attached further details of the application and exhibition overleaf for your information.

The Department's contact officer for this proposal, Andrew Beattie, Senior Planner, can be contacted on 02-9228-6384 or via email at Andrew.Beattie@planning.nsw.gov.au. Please mark all correspondence regarding the proposal as indicated overleaf.

Yours sincerely,

20/8/10

Richard Pearson
Deputy Director General
Development Assessment & Systems Performance



EXTENSION TO EXHIBITION OF ENVIRONMENTAL ASSESSMENT

34 Victoria Road (Marrickville Metro Shopping Centre), 13-55 Edinburgh Road & Part of Smidmore Street, Marrickville

Application No	MP09_0191
Location	34 Victoria Road, 13-55 Edinburgh Road and part of Smidmore Street, Marrickville
Proponent	Urbis on behalf of AMP Capital Investors
Council area	Marrickville

Description of proposal

Extension to the existing Marrickville Metro Shopping Centre to include an additional level of retail floorspace with an additional level of parking above, construction of a new building comprising 2 levels of retail with 2 levels of parking above (13-55 Edinburgh Road), and the closure of part of Smidmore Street between Edinburgh Road and Murray Street to create a public plaza including a 2 storey retail link.

Exhibition

The exhibition period for the Environmental Assessment (EA) has been extended to **Friday 10 September 2010**.

The Environmental Assessment (EA) may be viewed during regular business hours, at:

Department of Planning

- Information Centre, 23-33 Bridge Street, Sydney.

Marrickville Council

- Citizens' Service Centre, 2-14 Fisher Street, Petersham; and
 - Marrickville Library – Cnr Marrickville and Petersham Roads, Marrickville.
-

Submissions

Submissions on the project must reach the Department by close of business on **Friday 10 September 2010**. Your submission should include:

- Your name and address;
- The name of the application and the application number;
- A statement on whether you support or object to the project; and
- The reasons why you support or object to the project.

Your submission should be marked 'Attention: Director, Metropolitan Projects' and be:

- Faxed to (02) 9228 6455;
- Posted to Major Projects Assessment, Department of Planning, GPO Box 39, SYDNEY NSW 2001; or
- Emailed to plan_comment@planning.nsw.gov.au or via the entry for the project on the Department's website (majorprojects.planning.nsw.gov.au)

Persons lodging submissions are required to declare reportable political donations (including donations of \$1000 or more) made in the previous two years. For more details, including a disclosure form, go to www.planning.nsw.gov.au/donations

Under section 75H of the *Environmental Planning and Assessment Act 1979*, the Director-General is required to provide copies of submissions received during the exhibition period, or a report of the issues raised in those submissions, to the Proponent and other interested public authorities. It is Departmental policy to also place a copy of your submission on the Department's website. If you do not want your name to be made available to the Proponent, these authorities, or on the Department's website, please clearly state this in your submission.

Enquiries

1300 305 695 or information@planning.nsw.gov.au

ATTACHMENT 8

**REVIEW OF
TMAP AND TRAFFIC AND PARKING
STUDY
FOR
EXPANSION OF MARRICKVILLE METRO
SHOPPING CENTRE
AT
34 VICTORIA ROAD MARRICKVILLE**

Ref. 10087r

August 2010

Prepared By

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APPENDICES

Appendix 1 Extracts from Halcrow TMAP Report and Other Reports

Traffic Volumes

Traffic Modelling

Pedestrian Improvement Plan

List of Transport Improvements

Trade Area

Plans of the Proposal

1.0 INTRODUCTION

Transport and Urban Planning was appointed by Marrickville Council to undertake a review of the Traffic Management and Accessibility Plan (incorporating the Traffic and Parking Study) for Marrickville Metro. The TMAP is contained in a report document prepared by Halcrow dated July 2010.

2.0 PROPOSAL

Marrickville Metro Shopping Centre is located in the block bound by Victoria Road, Murray Street, Smidmore Street and Bourne Street. It has frontage to Victoria Road, Murray Street and Smidmore Street.

The proposal to upgrade and expand Marrickville Metro Shopping Centre includes:

- Increase in the retail floor area from 22,933m² GFA to 44,403m² GFA;
- Increase the off street parking from 1108 spaces to 1815 car spaces. Vehicle access points are proposed in Murray Street, Smidmore Street east of Edinburgh Road and in Edinburgh Road, east of Smidmore Street (left in / left out);
- Redevelopment of the existing industrial site (13 – 55 Edinburgh Road) to create a two level retail addition to the shopping centre
- The closure of Smidmore Street between Edinburgh Road and Murray Street to create a pedestrian plaza while retaining the car parking access at the western end. (NB. An alternative proposal retains Smidmore Street as public road with no road closure)

The proposed transport improvements recommended as part of the TMAP include:

- New bus stops (for 3 buses) and a new bus terminal (shelter etc) in Edinburgh Road to replace the existing facilities in Smidmore Street;
- Improvements to pedestrian routes around the shopping centre including to Sydenham and St Peters rail stations;
- Improvements to local footpaths for pedestrians;
- New dedicated bicycle parking for cyclists and proposed improvements, or connections to, local bike routes;
- A new taxi rank with a shelter and seats to replace the existing one in Smidmore Street;
- Provision of dedicated car share spaces within the new car park to encourage car sharing; and
- A Green Travel Plan.

The proposed road improvements include:

- Edgeware Road, Alice Street and Llewellyn Street intersection – Extend the length of existing parking restrictions on the Edgeware Road southbound approach and the Alice Street approach during peak periods;
- Unwins Bridge Road, Bedwin Road, May Street and Campbell Street intersection – Extend parking restrictions to create a dedicated left slip lane on the Unwins Bridge Road eastbound approach and a dedicated right-turn lane on the May Street westbound approach (with associated right-turn priority signal phase);
- Edinburgh Road, Edgeware Road and Bedwin Road intersection – Directional signage to encourage drivers to avoid the right-turn on to Bedwin Road in favour of using the Railway Parade underpass and left-turn on to Bedwin Road; and
- Edinburgh Road and Sydney Steel Road intersection – provide a new roundabout.

3.0 ASSESSMENT OF TMAP

3.1 Objectives and Targets

The TMAP has set objectives concerning trips and the mode of travel for staff and customers travelling to and from Marrickville Metro. The targets for car based trips and mode split are:

- No increase in the existing percentage in car based trips; and
- 22.5% of future person trips by public transport, taxis, walking or cycling compared with the current mode share of 18.5%

This results in a modest (small) increase in trips by walking, cycling and bus which are considered to be achievable targets.

3.2 Traffic Generation

Halcrow measured the existing traffic generation for Marrickville Metro as

- 1041 veh/hr on Thursday evening
- 1635 veh/hr on Saturday morning

No dates were provided in the report when the surveys were undertaken.

The traffic generation for Thursday evening matches the Halcrow traffic counts at the car park entry/exit, locations as shown on Figure 2. There is a small discrepancy between the traffic generation for Saturday morning and the Halcrow traffic counts shown on Figure 3. The latter provides a traffic generation of 1597 vph as compared to 1635 vph. The discrepancy is not considered to be significant.

Halcrow calculated that the existing traffic generation of Marrickville Metro on a Thursday evening and Saturday midday was 77% and 95% respectively of the generic traffic generation rate for a shopping centre of this size, as contained in the RTA's Guide to Traffic Generating Developments.

Halcrow applied these discount rates to the RTA's generic traffic generation rates when calculating the future traffic generation of the expanded shopping centre on Thursday evening and Saturday morning, which calculates to be:

- 1573 veh/hr on a Thursday evening; and
- 2573 veh/hr on a Saturday midday period

The methodology is considered satisfactory.

3.3 Traffic Assignment

Halcrow assigned the traffic on the road network suggesting that the majority of the traffic growth is expected to come from the south, south east and west with little traffic increase from the north or north east.

As a result of this assumption the traffic assignment shows that there will be either no and or very small increase in additional traffic using Edgeware Road (north of Llewellyn Street) and or Alice Street, east of Edgeware Road.

Transport and Urban Planning does not agree with the assignment and considers that a higher proportion of new trips or additional trips will arrive via Edgeware Road north of Llewellyn Street and via Alice Street. Transport and Urban Planning's views are based on:

- The existing road network and traffic controls in the area;
- The proportion of existing vehicles trips generated by the shopping centre that use Edgeware Road north of Llewellyn Street and Alice Street; and
- A review of the trade area defined for Marrickville Metro.

Table 3.1 and 3.2 shows a comparison of the existing and future traffic volumes predicted to arrive from and depart to the north and east along Edgeware Road. There is a considerable reduction in the proportion of traffic arriving from and departing to the north along Edgeware Road and virtually no increase in traffic using Victoria Road at Edgeware Road either on a Thursday evening or the Saturday midday period.

By comparison the traffic increases in Enmore Road north of Llewellyn Street for the northbound and southbound through movements increases by 193vph (110vph northbound and 83vph southbound) in the Thursday PM peak hour and 260vph (130vph northbound and 130 southbound) in the Saturday midday period.

As there is an existing No Right Turn from Stanmore Road into Enmore Road to travel south at the Enmore Road / Stanmore Road / Edgeware Road, this means that any traffic arriving from the west along Stanmore Road or from the north west via Liberty Street would be forced to use Edgeware Road, due to the No Right Turn restriction to travel to Marrickville Metro.

It would appear that the above right turn prohibition has been overlooked in the Halcrow traffic assignment.

TABLE 3.1

**COMPARISON OF THURSDAY PM HOUR TRAFFIC VOLUMES
ARRIVING FROM AND DEPARTING TO
THE NORTH IN EDGEWARE ROAD**

Traffic Travelling Towards Marrickville Metro		Existing	With Proposal	Change
1.	Right turn from Edgeware Road into Victoria Road	214	220	+6
2.	Right turn from Murray Street into car park	148 (30%) ³	157 (20%) ³	+9
3.	Southbound through movement in Murray Street at car park ¹	76 ¹	73 ¹	-3
Traffic Travelling Away from Marrickville Metro		Existing	With Proposal	Change
1.	Left turn out of car park into Murray Street	99 (19%) ⁴	139 (17%) ⁴	+40
2.	Northbound through traffic movement in Murray Street at car park ²	150 ²	116 ²	-34
3.	Left turn from Victoria Road into Edgeware Road	241	247	+7
4.	Right turn from Victoria Road into Edgeware Road	11	11	0
5.	Left turn from Smidmore Street into Edgeware Road	42	42	0

1. A proportion of this traffic would be travelling towards the car park entrance in Smidmore Street.

2. A proportion of this traffic would have exited from the Smidmore Street car park exit.

3. Percentage of total entering traffic.

4. Percentage of total exiting traffic.

TABLE 3.2

**COMPARISON OF SATURDAY MIDDAY HOUR VOLUMES
ARRIVING FROM AND DEPARTING TO
THE NORTH IN EDGEWARE ROAD**

Traffic Travelling Towards Marrickville Metro		Existing	With Proposal	Change
1.	Right turn from Edgeware Road into Victoria Road	251	263	+12
2.	Right turn from Murray Street into car park	201 (27%) ³	216 (18%) ³	+15
3.	Southbound through movement in Murray Street at car park ¹	72 ¹	69 ¹	-3
Traffic Travelling Away from Marrickville Metro		Existing	With Proposal	Change
1.	Left turn out of car park into Murray Street	198 (24%) ⁴	272 (21%) ⁴	+74
2.	Northbound through traffic movement in Murray Street at car park ²	172 ²	110 ²	-62
3.	Left turn from Victoria Road into Edgeware Road	339	351	+12
4.	Right turn from Victoria Road into Edgeware Road	32	32	0
5.	Left turn from Smidmore Street into Edgeware Road	36	36	0

1. A proportion of this traffic would be travelling towards the car park entrance in Smidmore Street.

2. A proportion of this traffic would have exited from the Smidmore Street car park exit.

3. Percentage of total entering traffic.

4. Percentage of total exiting traffic.

Transport and Urban Planning also considers that there is likely to be some additional use of Lord Street by vehicles travelling between Marrickville Metro Shopping Centre and King Street.

A traffic assignment that increase trips from the north, north west and east via Edgeware Road and Alice Street, would also reduce the number of trips from the south and west.

3.4 Traffic Impacts

Traffic Volume Increases

The net increase in the traffic generation due to the expansion proposal is:

- 532 veh/hr in the Thursday evening period; and
- 938 veh/hr in the Saturday midday period

The largest traffic volume increase would occur in those streets immediately adjacent the car park access points to the shopping centre, which includes Edinburgh Road east and west of Murray Street, as well as Murray Street. Other streets that will experience traffic volume increase include Enmore Road, Victoria Road, (west) Bedwin Road, Unwins Bridge Road, May Street, Fitzroy Street, Addison Road and Campbell Street. Also as noted above Transport and Urban Planning also considers there will be traffic volume increases in Edgeware Road north of Llewellyn Street, Victoria Road (east), Alice Street and Lord Street.

Road Closure of Smidmore Street

The TMAP report is based on the closure of Smidmore Street between Murray Street and east of Edinburgh Road. The TMAP does not provide an alternative assessment if Smidmore Street remains open.

Intersection Operation

Halcrow used SIDRA traffic modelling to determine the impacts of the additional traffic on the various critical intersections. The modelling for the future traffic conditions with the proposal in place has been undertaken adopting the proposed road improvement works at the four intersections nominated in Section 2 including the Edgeware Road / Alice and Llewellyn Streets intersection, as well as the future traffic generation from the Annette Kellerman Aquatic Centre in Enmore Park and the industrial subdivision of part of the Old Unilever site on the corner of Edinburgh Road and Fitzroy Street.

As a guide, a Level of Service C operation or better is considered to be the desirable design goal for intersections. However a number of intersections in the Sydney Metropolitan Area operate at Level of Service D operation or worse, so some professional judgment is required when comparing existing and future operation of intersections.

Those intersections found by Halcrow that will have a Level of Service D operation or worse, with the proposal in place include:

- Edgeware Road / Alice and Llewellyn Streets -
Level of Service E operation in the Thursday evening and Saturday midday periods with average vehicle delays of 61.4 seconds and 58.5 seconds respectively.
- Edgeware Road / Victoria Road –
Level of Service D operation in the Thursday evening and Saturday midday periods with average vehicle delays of 43.3 seconds and 44.9 seconds respectively¹
- Edgeware Road / Smidmore Street -
Level of Service D operation in the Saturday midday period with average vehicle delays of 46.9¹

¹ Average Vehicle Delay for minor movement

The increases in Average Vehicle Delay due to the proposal at the modelled intersections ranges between 1 – 25 seconds in the Thursday PM period and between 1 – 17 seconds in the Saturday midday period.

Appendix 1 provides a summary of the modelling output for intersections as provided in the Halcrow report.

It should be noted that a traffic assignment that provides higher traffic volumes using the Edgware Road / Alice and Llewellyn Street intersection and the Edgware Road / Victoria Road intersection would increase the vehicle delays at both these intersections and reduce the future level of service.

Higher traffic volumes using Edgware Road to and from the north would also be likely to increase vehicle delays at the Enmore Road / Stanmore Road / Edgware Road intersection.

3.5 Proposed Road Improvement Works

The proposed road improvement works include:

- i) A new roundabout at Edinburgh Road and Sydney Steel Road
- ii) Directional signage in Edinburgh Road at Railway Parade to encourage use of the Railway Parade underpass in lieu of the right turn from Edinburgh Road into Bedwin Street
- iii) Extend parking restrictions in Alice Street and in Edgware Road for southbound traffic to 50 metres during weekday PM periods and on Saturday mornings at the Edgware Road / Alice Street / Llewellyn Street intersection
- iv) Extend parking restrictions in Unwins Bridge Road and in May Street, as well as phasing and line marking changes at the Unwins Bridge Road / May Street / Campbell Street intersection. The parking restrictions nominated are 60 metres in Unwins Bridge Road and 80 metres during the weekday PM peak period in May Street.

The proposed changes for items (iii) and (iv) are required to reduce the future vehicle delays at the intersections. The proposed linemarking and phasing changes to the Unwins Bridge Road / May Street / Campbell Street intersection will require RTA approval.

3.6 Proposed Transport Improvements

These include:

- New bus stops with shelter, light and information for 3 buses in Edinburgh Road to replace the existing bus stops in Smidmore Street;
- A new taxi rank in Murray Street to replace the existing taxi rank in Smidmore Street;
- Improvements (proposed and suggested) to walk routes around Marrickville Metro including the walk routes to Sydenham and St Peters station; and
- Suggested improvements / linkages to bicycle routes.

3.6.1 Bus and Taxi Improvements

The proposed bus stops and taxi rank changes are the same for the proposal with the closure of Smidmore Street or the alternative proposal with no closure.

The changes to bus routes for the bus stops would require approval of Sydney Buses. It would appear that some buses will be required to U turn at the proposed roundabout in Edinburgh Road at Sydney Steel Road. If this is the case the roundabout would need to be designed to facilitate U turns by buses, as well as to cater for the articulated vehicles that will use the intersection.

The Halcrow report notes that the new taxi rank would be in Murray Street. The proposed ground floor plan for the proposal with Smidmore Street closed, shows the taxi rank in Murray Street at the roundabout controlled intersection with Smidmore Street adjacent the road closure. This location is problematical with regard to potential intersection accidents as it would create confusion as to right of way at the intersection for taxis leaving the rank and the opposing approaches. If it is to be retained in this location, it would require a redesign. Alternatively it could be relocated.

3.6.2 Pedestrian Improvements

There are no pedestrian volumes showing where pedestrians currently cross roads in the vicinity of Marrickville Metro, so it is difficult to provide a proper assessment of the proposed pedestrian improvements. Apart from the nominated pedestrian improvements along the frontage(s) the proposed shopping centre, other suggested improvements include:

- A new pedestrian crossing across Edinburgh Road, east of Sydney Steel Road;
- A new pedestrian refuge in Edgeware Road south east of Smidmore Street;

- Improve lighting along the Sydney Steel Road footpath; and
- Investigate with Council the potential to improve lighting and widen the path at Juliet Street and Victoria Road.

The proposed pedestrian improvements are shown in Figure 10 of the Halcrow report. One anomaly in Figure 10 is item 5, which is new traffic signals at the intersection of Edgeware Road and Victoria Road. This improvement is not listed anywhere else in the body of the report but is included in the list of Transport Improvements at the rear of the report. The matter requires clarification, to determine if the proposed traffic signals are part of the proposed pedestrian improvements.

3.6.3 Cycle Facilities

It is proposed to initially provide 80 bicycle parking spaces for the development in external areas as well as within the development. Bicycle parking would then be increased as required, by converting car spaces. However it is not clear what mechanism would be used to ensure that this occurs at a future time.

The proposed provision is less than Council's required bicycle rate for parking for retail uses which is 237 bicycles and is based on

- 1 bicycle space / 500m² for customers
- 1 bicycle space / 300m² for employees

For a large shopping centre proposal such as this, some reduction in the above bicycle parking provision would seem warranted, although Halcrow has not provided any justification for the large reduction suggested. If the reduced bicycle parking was based on the same proportional reduction that applies to car parking in the RTA Guidelines then the reduction would be approximately 33% which would require parking for 159 bicycles.

Also it would be preferable that the bicycle parking be provided wholly within the site to reduce the potential for bicycles to obstruct footpaths, public areas and walking routes adjacent the shopping centre.

Halcrow have also nominated a number of improvements to connect to bicycle routes including routes L10, L8 and L7. These are shown on Figure 11.

3.7 Parking Provision

A total of 1815 car parking spaces are proposed as part of the development as well as parking for 36 motor bikes. This provision is generally consistent with RTA's parking provision for a retail development of this size (44,403m² GFA) which is 4.1 spaces / 100m²GLA, and would require a total of 1821 car spaces.

Marrickville Council's DCP has a higher rate of parking provision (30 spaces plus 1 space / 20m² for shops over 1000m² GFA) which does not consider the reduced parking rate that occurs, as retail developments increase in size.

The existing peak parking demand at Marrickville Metro as measured by Halcrow is 978 spaces on a Saturday morning and is consistent with the RTA's parking rate provision, for the existing floor area.

Transport and Urban Planning concludes that the parking provision of 1815 car spaces is consistent with RTA Guidelines and that the RTA Guidelines are the appropriate guidelines to adopt, with regard to parking provision.

3.8 Loading

The proposal will incorporate a redesign of the loading facilities and provide three (3) separate loading areas which are accessed off the closed section of Smidmore Street and Murray Street (two (2) loading areas). A total of 28 loading bays are to be provided.

There is no swept path analysis showing the operation of the proposed loading bays, although it appears that there is sufficient room for all vehicles servicing the shopping centre to arrive and depart the loading bays in a forward direction and undertake all manoeuvring within the loading bays.

3.9 On Street Parking

Some parking associated with Marrickville Metro occurs in streets adjacent to the shopping centre. Other land uses in the area also generate on street parking.

The extent to which the on street parking is considered to be a problem in those streets that have residential frontages is unknown.

It is acknowledged that the Annette Kellerman Aquatic Centre will rely on on street parking in a number of streets immediately west and north west of Marrickville Metro and the parking management plan recommended additional on street angle parking as well as the introduction of permit parking.

Transport and Urban Planning considers that the parking provision for the expanded Marrickville Metro will be sufficient to accommodate the normal parking demand of the retail development. Based on this, the demand for on street parking should not increase because of the proposal, on the majority of normal retailing days.

None the less, if the development is approved and constructed, it is suggested that Council should monitor on street parking conditions adjacent Marrickville Metro and if required, introduce additional parking controls to discourage on street parking by workers and customers of Marrickville Metro.

4.0 CONCLUSIONS

Transport and Urban Planning's review of the TMAP report has found the following:

- (i) The TMAP has set realistic mode split targets for trips to the expanded retail shopping centre that if achieved, would provide a modest increase in trips by walking, cycling and public transport.
- (ii) The calculation of the traffic generation for the expanded shopping centre is consistent with RTA Guidelines. A discount has been applied in line with the traffic generation of the existing shopping centre. The proposal is expected to generate a total of 1573 veh/hr on a Thursday evening and 2573 veh/hr on a Saturday midday period. This will be an increase of 532 veh/hr on Thursday evening and 938 veh/hr on Saturday midday.
- (iii) The proposal incorporates a road closure of Smidmore Street between east of Edinburgh Road and Murray Street, as well as road improvement at four intersections. There is an alternative proposal which retains Smidmore Street as a public road (ie. no closure), however the TMAP does not assess this alternative.
- (iv) Transport and Urban Planning considers that the traffic assignment adopted by Halcrow 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 Marrickville Metro. Transport and Urban Planning also considers that there will be some additional increase in traffic using Lord Street. This will be offset by a reduction of future predicted traffic in a number of other streets. Transport and Urban Planning's assessment is based on the existing road network and traffic controls, the current arrival and departure patterns by shoppers and a review of the trade area.
- (v) Based on (iv) above the traffic impacts at the Edgeware Road / Alice Street / Llewellyn Street and Edgeware Road / Victoria Road intersection would be higher (ie. worse) than predicted in the Halcrow report. These intersections are predicted by Halcrow to operate at a Level of Service E operation and D operation respectively. The Smidmore Street / Edgeware Road intersection is also expected to have a Level of Service D operation.
- (vi) The proposal incorporates changes to bus stops and the bus servicing of Marrickville Metro as well as relocation of the taxi rank.
- (vii) The changes to bus operations (ie. bus stops and re routing) would need to be agreed to by Sydney Buses. The proposed roundabout at Edinburgh Road / Sydney Steel Road would also need to be designed to accommodate U turning buses, as well as articulated vehicles.
- (viii) The proposed location of the taxi rank adjacent the roundabout controlled intersection of Murray Street / Smidmore Street as shown on the architectural

plans would result in right of way issues at the intersection and is potentially unsafe. This should be either redesigned or the taxi rank relocated.

- (ix) Halcrow 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 Halcrow arrived at the suggested figure. 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.
- (x) The proposed parking provision of 1815 car parking spaces and 36 motor bike spaces is consistent with RTA Guidelines. Transport and Urban Planning considers that the RTA Guidelines are the appropriate guidelines to adopt with regard to the parking provision for the development.
- (xi) Three (3) separate loading bay areas are proposed to accommodate a total of 28 bays. No swept path analysis has been provided, although it appears that there is sufficient room for all vehicles servicing the shopping centre to manoeuvre within the loading areas and enter and exit in a forward direction.
- (xii) Some on street parking associated with the existing shopping centre occurs in the streets adjacent Marrickville Metro. If the proposal is approved and constructed it is recommended that Council monitor the on street parking demand in those streets adjacent Marrickville Metro and if required introduce additional parking controls to discourage on street parking by workers and customers of Marrickville Metro.
- (xiii) 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. 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 clarification as whether or not it is proposed as part of the TMAP.

APPENDIX 1

Extracts from Halcrow TMAP Report and Other Reports

Traffic Volumes

Traffic Modelling

Pedestrian Improvement Plan

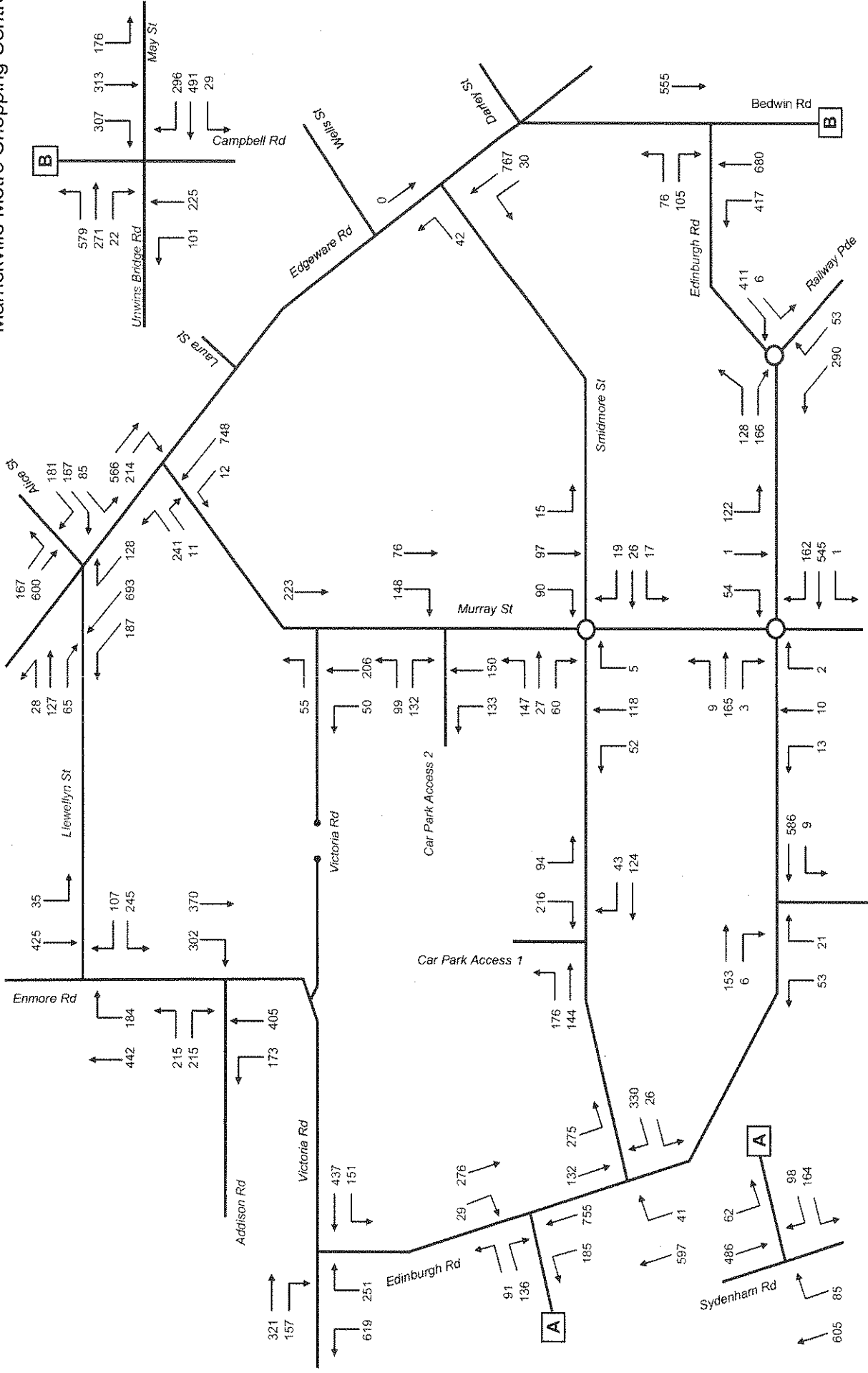
List of Transport Improvements

Trade Area

Plans of the Proposal

2010 SURVEYED TRAFFIC FLOWS, THURSDAY PM

Marrickville Metro Shopping Centre



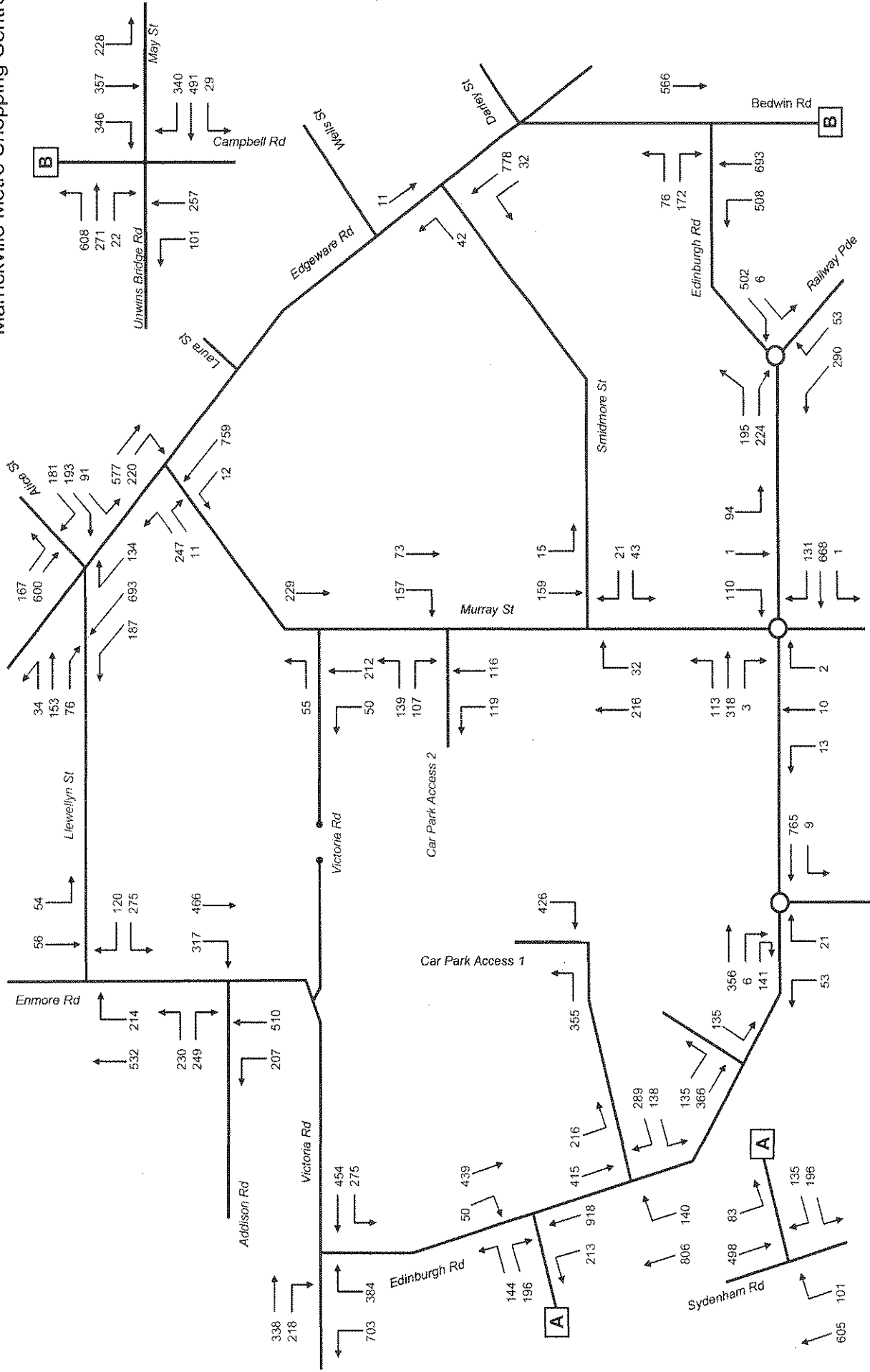
Marrickville Metro Shopping Centre



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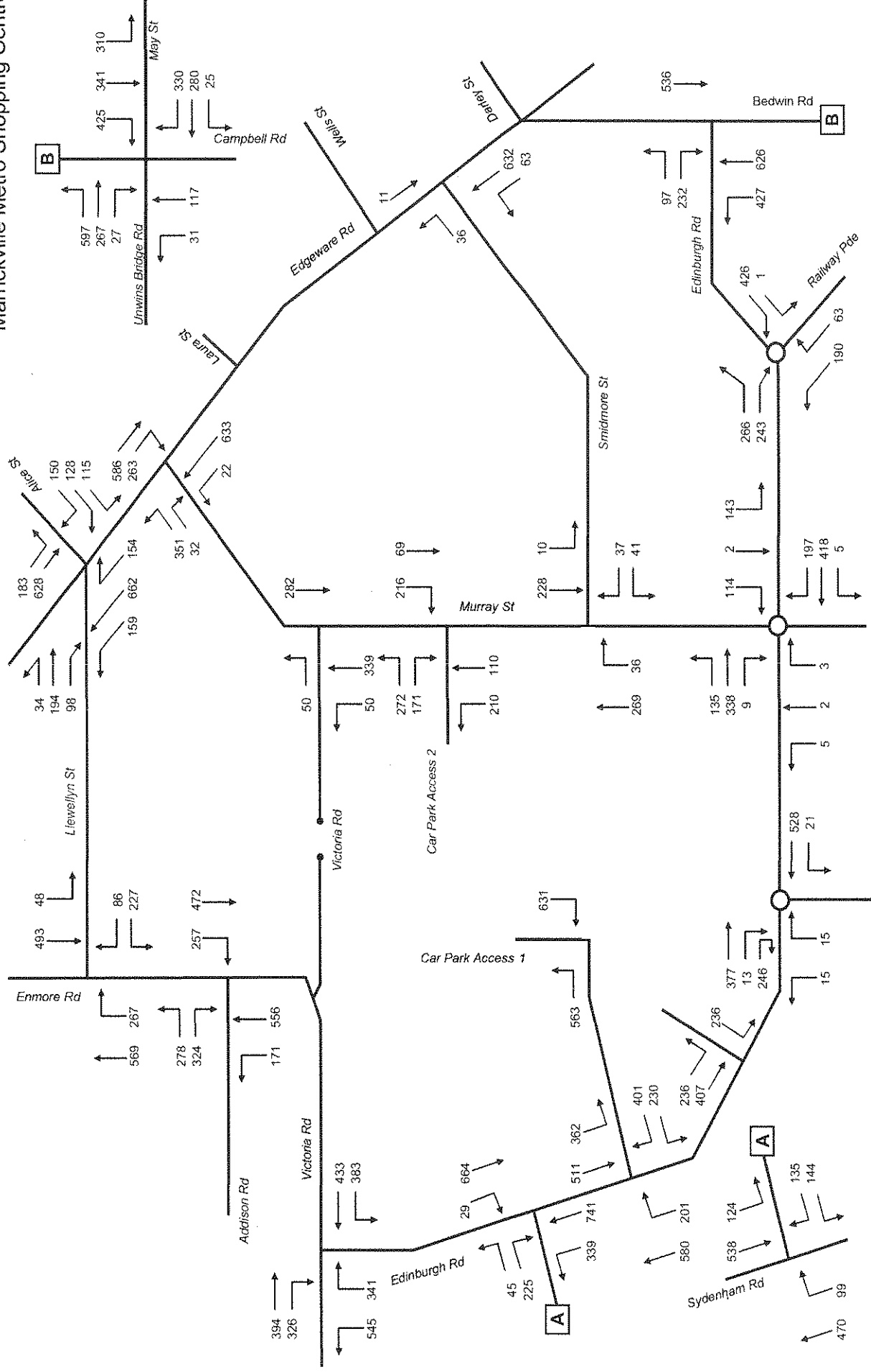
FUTURE WITH EXPANSION TRAFFIC FLOWS, THURSDAY PM

Marrickville Metro Shopping Centre



FUTURE WITH EXPANSION TRAFFIC FLOWS, SATURDAY

Marrickville Metro Shopping Centre



8.5 Future Intersection Performance

The intersections surrounding the Marrickville Metro Shopping Centre were re-analysed using SIDRA 4.0. Table 8.2 compares the existing and future operation of these.

Table 8.2 – Comparison of Existing and Future Peak Hour Intersection Operation

Intersection		Control	Thursday PM		Saturday	
			LoS	Av. Delay	LoS	Av. Delay
Enmore Rd / Llewellyn St	Existing	Signals	B	22.0	B	20.3
	Future	Signals	C	29.2	C	34.0
Addison Rd / Enmore Rd	Existing	Signals	B	25.1	B	22.6
	Future	Signals	C	35.4	C	35.7
Victoria Rd / Edinburgh Rd	Existing	Signals	B	28.1	B	27.2
	Future	Signals	C	31.4	C	33.9
Edgeware Rd / Alice St / Llewellyn St ⁽¹⁾	Existing	Signals	D	51.2	D	50.5
	Future ⁽²⁾	Signals	E	61.4	E	58.5
Edgeware Rd / Victoria Rd	Existing	Signs	C	41.3	C	41.8
	Future	Signs	D	43.3	D	44.9
Edinburgh Rd / Fitzroy St	Existing	Roundabout	B	15.5	A	11.9
	Future	Roundabout	C	41.0	B	17.1
Fitzroy St / Sydenham Rd	Existing	Signs	A	11.5	A	12.0
	Future	Signs	A	12.1	A	12.4
Edinburgh Rd / Smidmore St	Existing	Signals	B	26.7	C	29.6
	Future	Signals	B	21.6	D	46.9
Smidmore St/ Murray St	Existing	Roundabout	A	8.0	A	8.2
	Future	Signs	A	11.6	A	14.3
Edinburgh Rd / Sydney Steel Rd ⁽¹⁾	Existing	Signs	A	11.6	A	9.4
	Future	Roundabout	A	13.8	A	12.3
Edinburgh Rd / Murray St	Existing	Roundabout	A	11.2	A	10.7
	Future	Roundabout	A	8.0	A	12.4
Edinburgh Rd / Railway Pde	Existing	Roundabout	A	9.8	A	9.6
	Future	Roundabout	A	12.0	A	10.2
Edinburgh Rd / Bedwin Rd ⁽³⁾	Existing	Signs	B	24.8	B	24.2
	Future	Signs	C	35.4	C	36.7
Bedwin Rd / Unwins Bridge Rd / Campbell Rd / May St ⁽¹⁾	Existing	Signals	F	74.5	C	28.8
	Future	Signals	C	32.2	C	29.1

(1) Future with modified layout

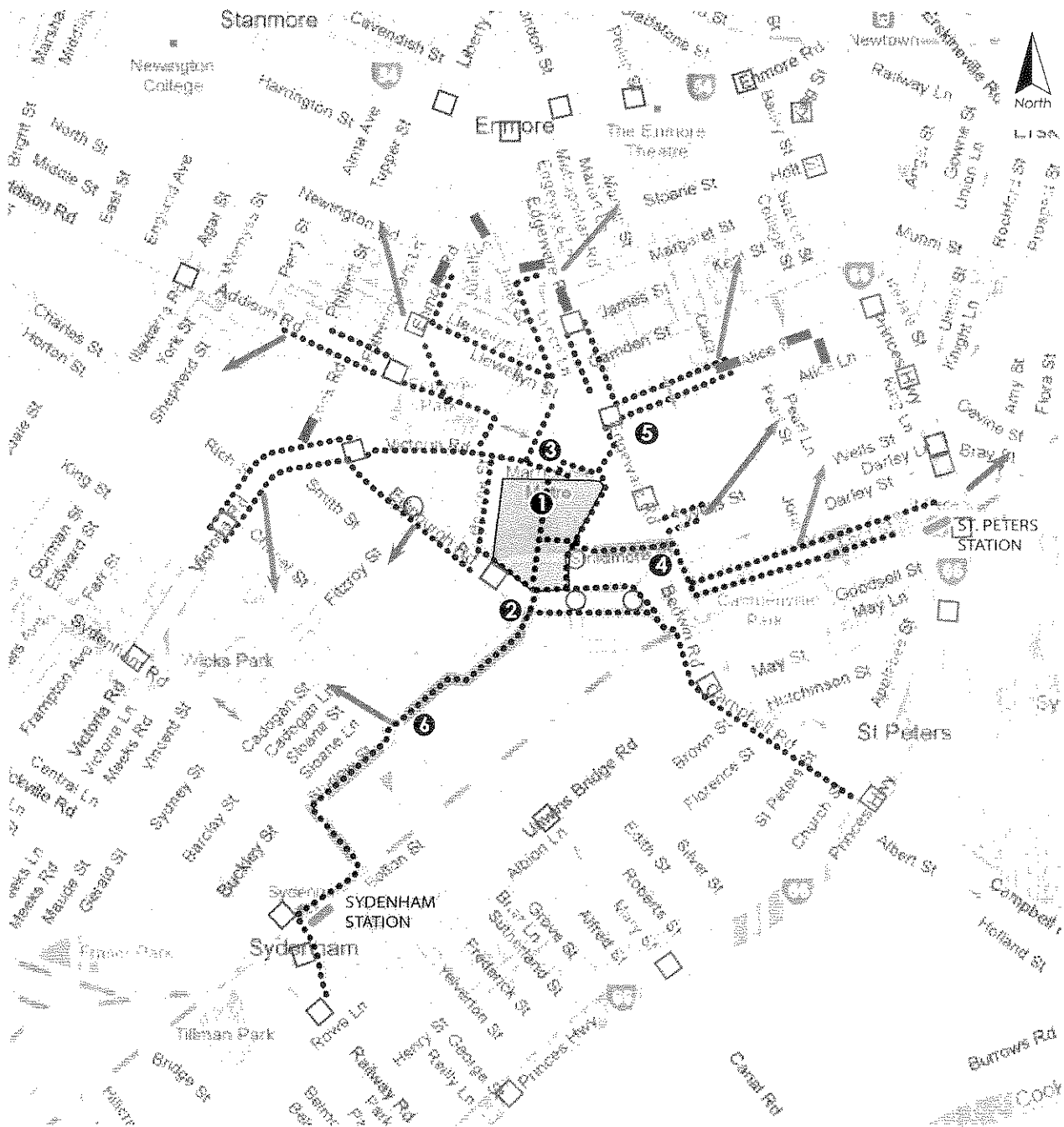
(2) Relative additional traffic contributions are:

Thursday PM	15% Marrickville Metro Expansion
	85% Aquatic Centre + Subdivision
Saturday	24% Marrickville Metro Expansion
	76% Aquatic Centre + Subdivision

(3) Assumes any growth in right turns into Bedwin Road uses underpass to turn left to south to avoid delays.

PROPOSED PEDESTRIAN ROUTE IMPROVEMENTS

MARRICKVILLE METRO TMAP



List of Improvements

- 1 New footpaths on site frontage, accessible entries/exits, new kerb ramps at immediate crossings.
- 2 New pedestrian crossing
- 3 Investigate improvements to remedy 'squeeze' point
- 4 Proposed pedestrian refuge in Edgeware Road at Smidmore Street
- 5 New traffic signals at the intersection of Edgeware Road and Victoria Road
- 6 Improve intensity of lighting and security on pedestrian path

Key

- Walking Route
- ➔ Connection to local area and street network
- Signals
- Roundabout
- Traffic Island/refuge
- ➔ Pedestrian Crossing
- Improved Pedestrian Routes to Stations
- Train Station

List Transport of Improvements

Information Boards in public place

- St Peters and Sydenham Station;
- Enmore Road Bus stops.

Pedestrian Refuge

- Edgeware Road south east of Smidmore Road.

Improvements to Lighting

- Juliet Street and Victoria Road; and
- Along Sydney Steel Road continuation footpath.

Footpath widening

- Juliet Street and Victoria Road.

Traffic signals

- Victoria Road with Edgeware Road.

Pedestrian crossing

- Edinburgh Road east of Sydney Steel Road.

Mixed Traffic Bicycle On Road Markings

- Mark bicycle road symbols every 75m along the route plus at intersections along these routes:
 - Lord Street and Darley Street extending the existing bicycle lanes from John Street to Edgeware Road;
 - Edgeware Road under Bedwin Road connecting the Lord and Darley Street lanes to Edinburgh Road;
 - Edinburgh Road to the Metro Entrance / exit;
 - Edinburgh Road and Sydney Steel Road;
 - Shirlow Street; and
 - Victoria Road to connect Metro with L7 and existing facilities in Juliet Street and Black Street.

Shared Bicycle and Pedestrian Path

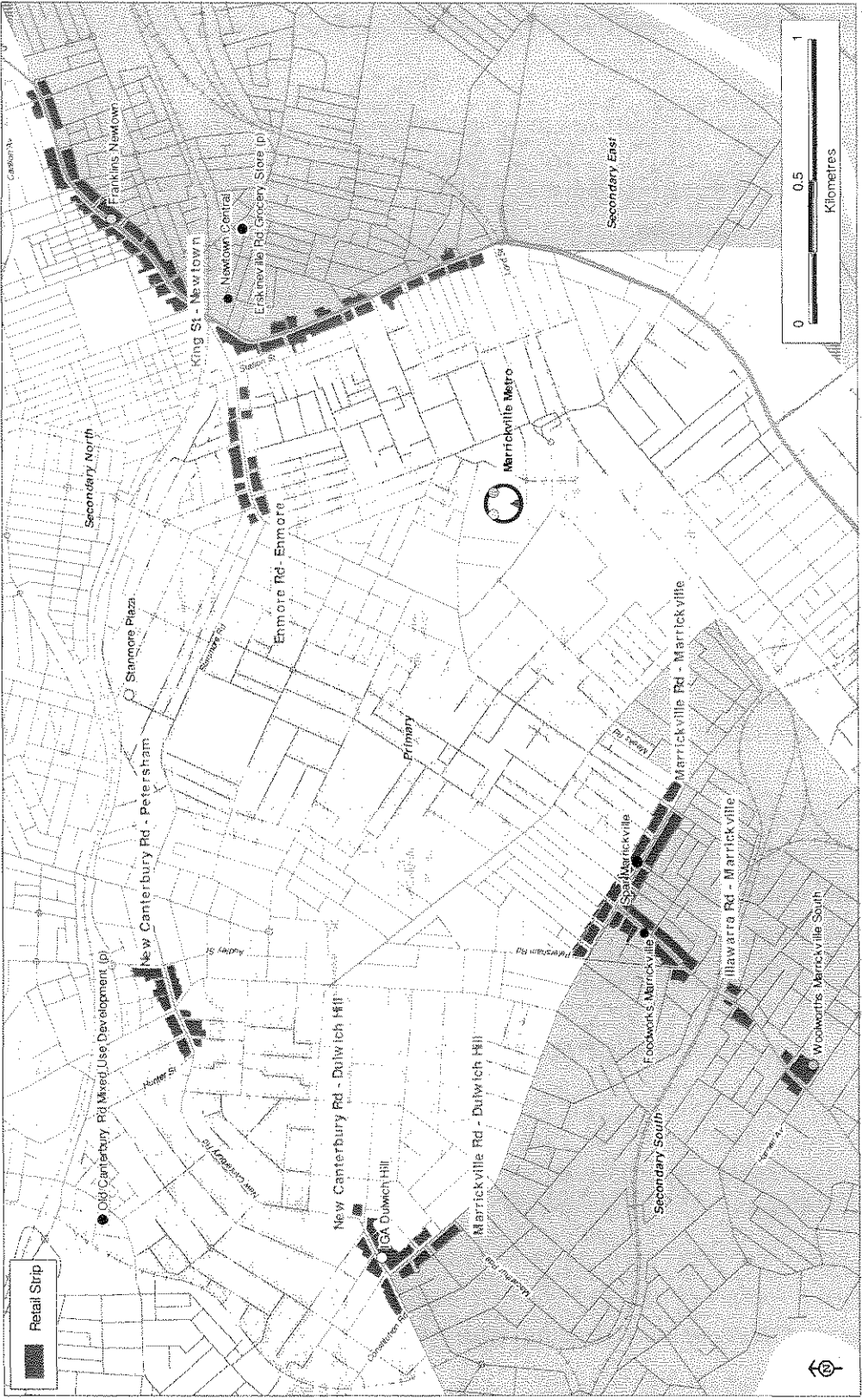
- Edge lines and dividing line along footpath, pavement symbols at 75 m intervals, signs at 75m intervals and warning signs at side streets for shared path along eastern side of Sydenham Road and northern side of Railway Parade.

Contra Flow Lane

- Continuous white edge lines, green coloured pavement, road symbols at 75m intervals, directional arrows northbound in Shirlow Street south of Garden Street.

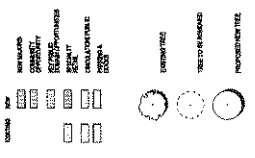
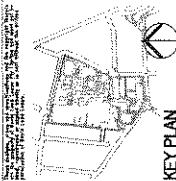
Pedestrian and Bicycle Way finding Signage

- Way finding signage on streets.

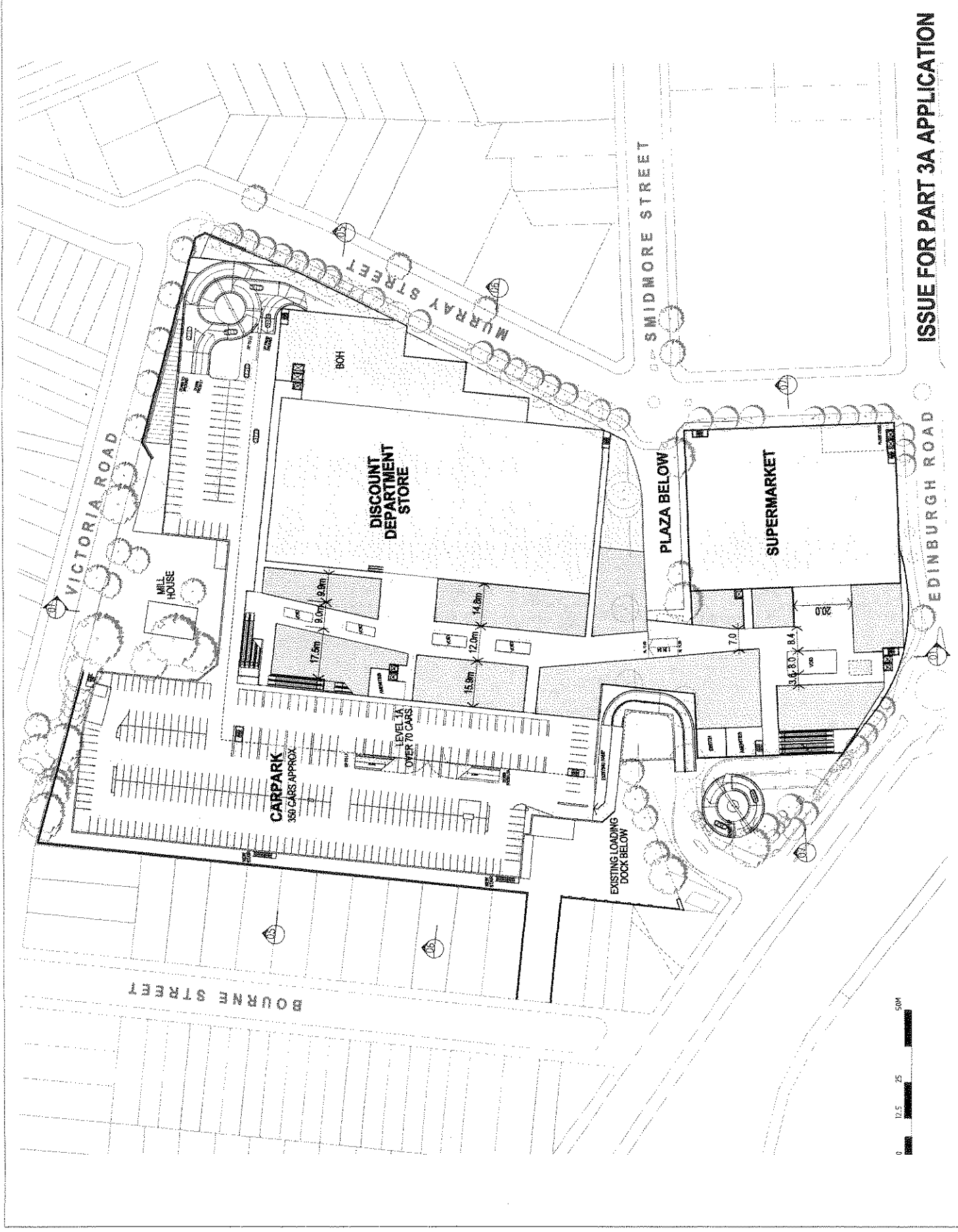


Map 4.1: Marrickville Metro Trade Area & Retail Strips





NO.	DATE	DESCRIPTION	BY	CHKD.
1	11/25/09	ISSUE FOR PART 3A APPLICATION	160496-3A	160496-3A
2	11/25/09	ISSUE FOR PART 3A APPLICATION	160496-3A	160496-3A
3	11/25/09	ISSUE FOR PART 3A APPLICATION	160496-3A	160496-3A
4	11/25/09	ISSUE FOR PART 3A APPLICATION	160496-3A	160496-3A
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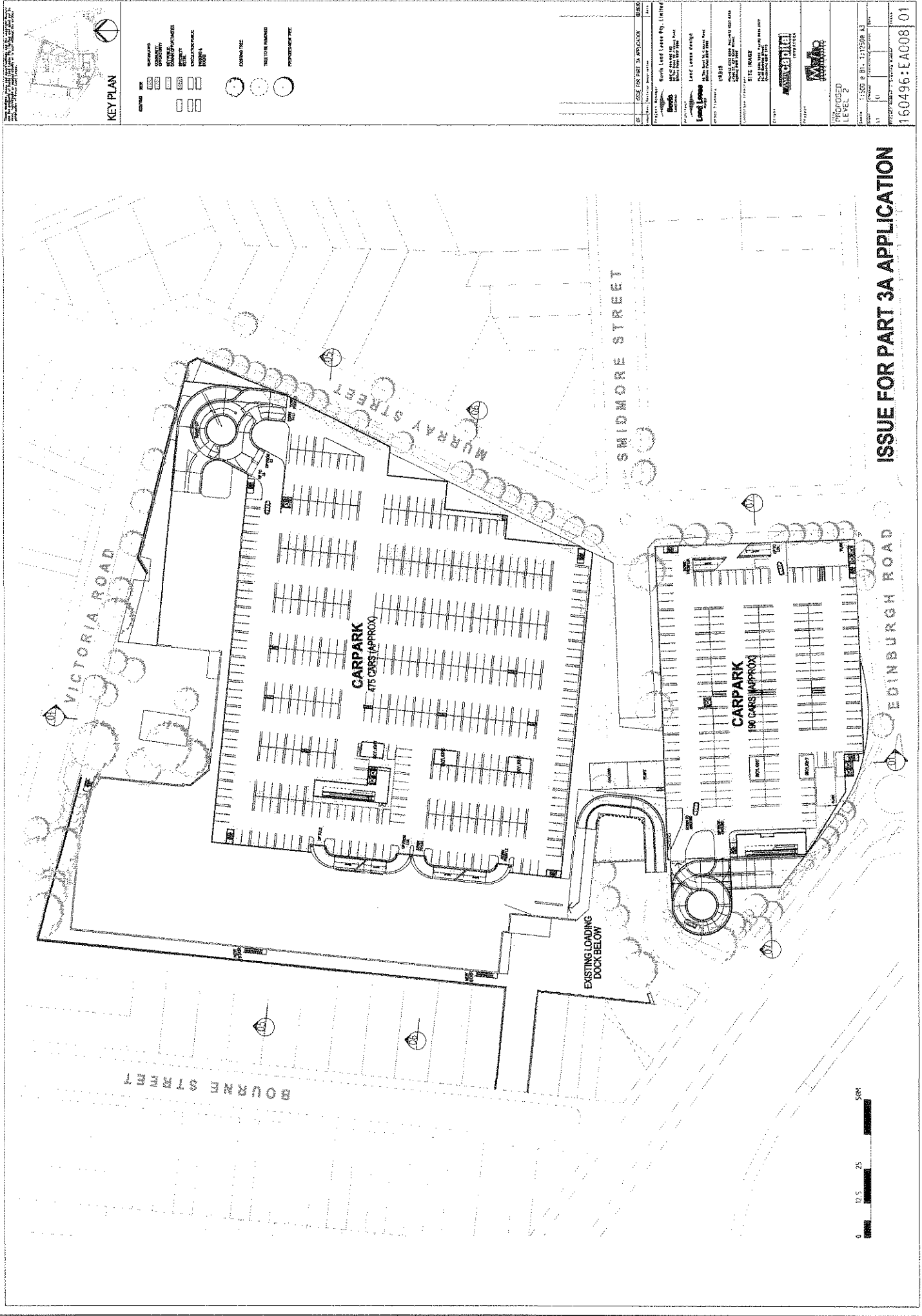
ISSUE FOR PART 3A APPLICATION

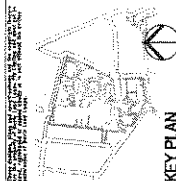
EDINBURGH ROAD

SMIDMORE STREET

MURRAY STREET

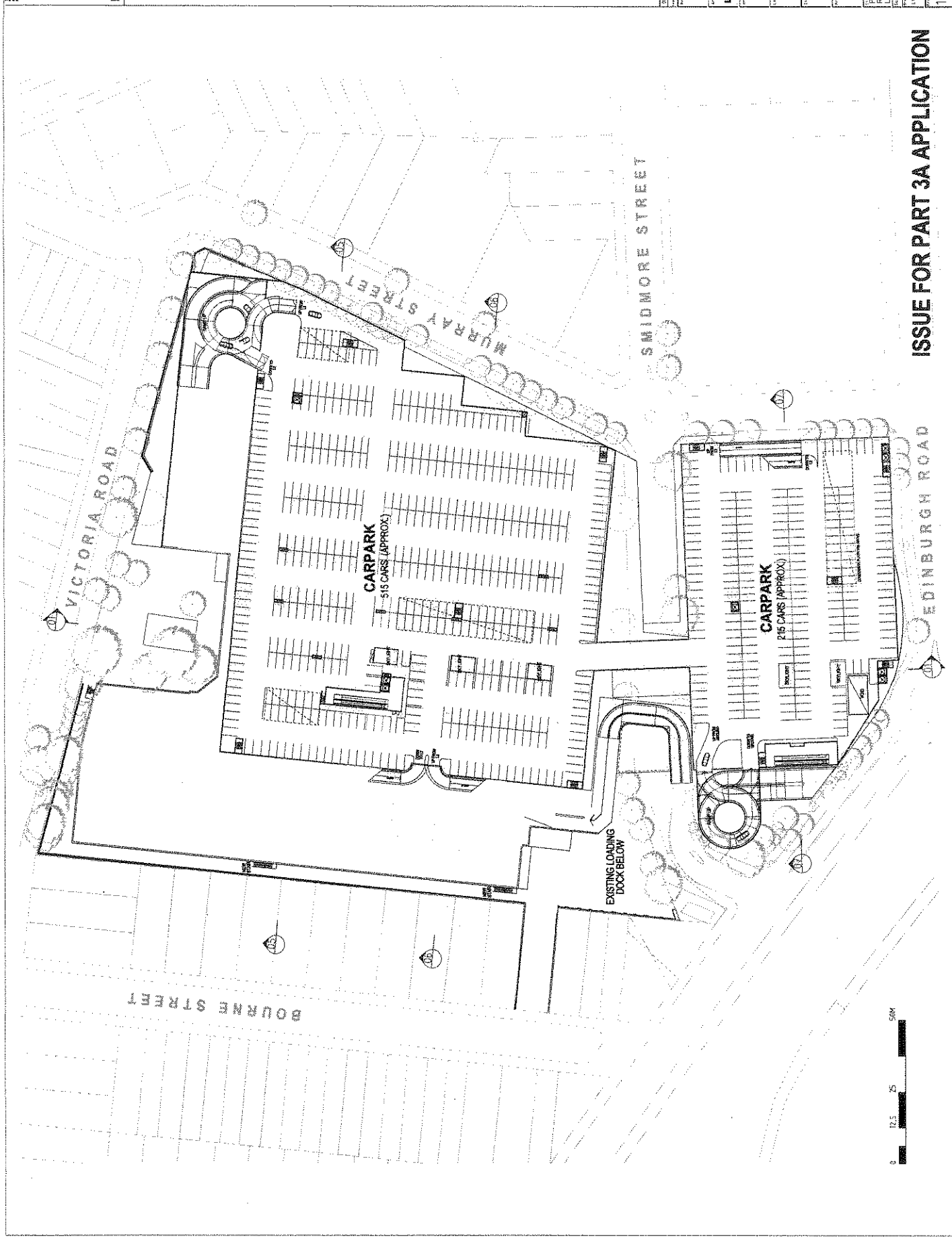
VICTORIA ROAD





KEY PLAN

- LEGEND**
- PROPOSED ROADS
 - PROPOSED CARPARKS
 - PROPOSED BUILDINGS
 - PROPOSED LANDSCAPE
 - PROPOSED UTILITIES
 - PROPOSED FENCES
 - PROPOSED LIGHTING
 - PROPOSED SIGNAGE
 - PROPOSED PAVING
 - PROPOSED PLANTING
 - PROPOSED WATERWAYS
 - PROPOSED OTHER



ISSUE FOR PART 3A APPLICATION

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