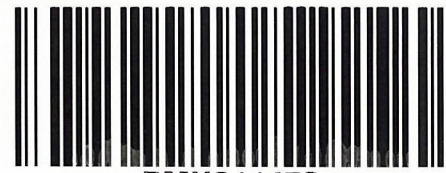




3415

*Chris W*

18 March 2011



PMU011470

**RECEIVED**

**23 MAR 2011**

**Director-General**

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

Dear Mr Haddad

**Marrickville Metro Shopping Centre  
Exhibition of Preferred Project Report**

I refer to the above matter and Council's previous submission in response to the exhibition of the Environmental Assessment Report, prepared on behalf of AMP Capital Investors (AMPCI), to accompany a concept plan application under Part 3A for the subject land.

As you are aware, the proposal remains substantially the same as the former development with reductions in floor area, car parking and building heights and the exclusion of Smidmore Street from the development. Consequently, Council's objections in terms of the suitability of the land use from a strategic land use perspective remain the same as those for the former proposal. Attached (Attachment 1) is Council's previous submission in this regard.

In addition, Council has commissioned an economic assessment (Attachment 2) and a traffic and transport review (Attachment 3) to consider whether the impacts associated with the revised proposal have been satisfactorily mitigated from those associated with the former proposal. As indicated in these studies, the proposal remains unsatisfactory with regards to its economic effects on surrounding centres and with respect to the traffic and transport impacts on the local road network.

In recognition of the complex issues associated with the subject proposal Council's previous request that the application be considered by the Planning Assessment Committee (PAC) is reiterated. Moreover, in the interests of transparency it is requested that the Department's officers' report be made public and that the PAC be open to public representations.

Council also notes that the revised proposal does not incorporate a voluntary planning agreement (VPA). As noted above, given that the development remains substantially the same as that previously proposed it is appropriate, should the development proceed,



ENGLISH

IMPORTANT

This letter contains important information. If you do not understand it, please ask a relative or friend to translate it or come to Council and discuss the letter with Council's staff using the Telephone Interpreter Service.

GREEK

ZHMANTIKO

Αυτή η επιστολή περιέχει σημαντικές πληροφορίες. Αν δεν τις καταλαβαίνετε, παρακαλείστε να ζητήσετε από ένα συγγενή ή φίλο να σας τις μεταφράσει ή να έλθετε στα γραφεία της Δημαρχίας και να συζητήσετε την επιστολή με προσωπικό της Δημαρχίας Χρηματοοικονομικών. Τα ελληνικά Δημοτικά Διαμερίσματα.

PORTUGUESE

IMPORTANTE

Este carta contém informação importante. Se não o amigo/a para o traduzir ou venha até à Câmara Municipal (Council) para discutir o assunto através do Serviço de Interpretes pelo Telefone (Telephone Interpreter Service).

ARABIC

هذه الرسالة معلومات هامة. فإذا لم تفهمها يرجى أن تحتوي هذه الرسالة معلومات هامة. فإذا لم تفهمها يرجى أن تطلبوا من أحد أقربائكم أو أصدقائكم شرحها لكم، أو تفضلوا إلى البلدية وأخبروا الرسالة معكم لكي تناقشوها مع أحد موظفي البلدية من خلال الاستشارة بخدمات الترجمة اللغوية.

VIETNAMESE

THÔNG TIN QUAN TRỌNG

Nội dung thư này gồm có các thông tin quan trọng. Nếu đọc không hiểu, xin quý vị nhờ thân nhân hay bạn bè dịch giúp hoặc đem đến Hội đồng Thành phố để thảo luận với nhân viên qua trung gian Dịch vụ Thông dịch qua Điện thoại.

MANDARIN

重要资料

本信写有重要资料。如果不明白，请亲友为您翻译，或到市政府来，通过电话传译服务，与市政府工作人员讨论此信。



that the proponent provide community benefits via a VPA, equivalent to those previously proposed, on a pro-rata basis commensurate with the revised scale of the development. A commitment to provide such facilities would be a clear demonstration that the proponent has a genuine interest in the development providing benefits to the community.

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, appearing to read 'Ken Hawke', with a long horizontal flourish extending to the right.

Ken Hawke  
**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 35,200m<sup>2</sup>. 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 9,125m<sup>2</sup>. 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 <sup>2</sup> to 57,935m <sup>2</sup> (this includes 13,465m <sup>2</sup> of additional floor area of the proposed new shopping complex at 13 – 55 Edinburgh Road)
Increase in gross lettable area (GLA)	From 22,933m <sup>2</sup> to 44,403m <sup>2</sup>
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.

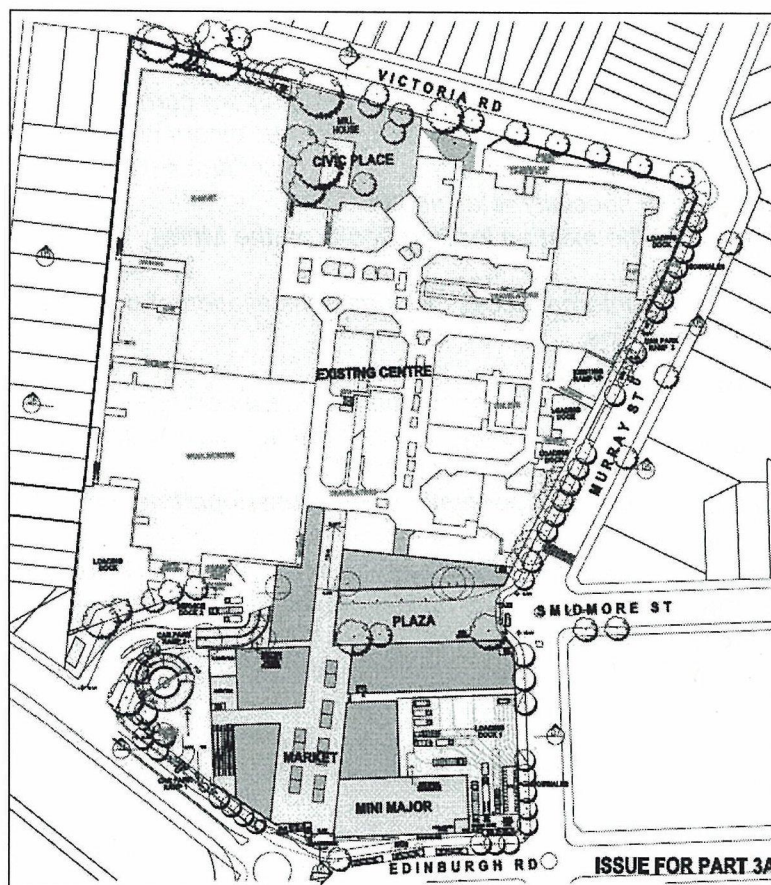


Figure showing two wings of the proposed Metro with pedestrian mall on Smidmore Street and pedestrian and vehicular connections between the two wings.



### 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.

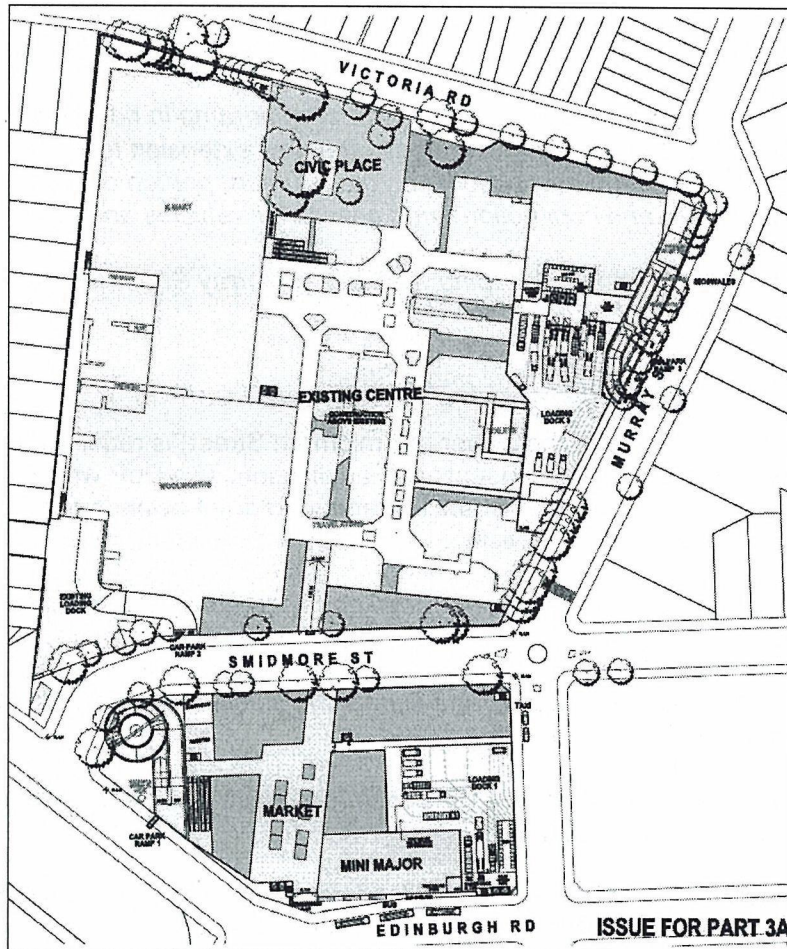


Figure showing two wings of the proposed Metro with no physical connections and Smidmore Street remaining open for vehicular traffic.

### 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 1000m<sup>2</sup>.*
- 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.



# Marrickville Metro Economic Impact Assessment

PREPARED FOR  
Marrickville Council

March 2011

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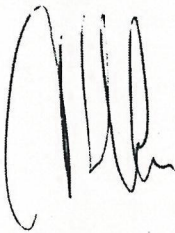
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# 1. EXECUTIVE SUMMARY

Hill PDA has been commissioned by Marrickville Council to undertake an Economic Impact Assessment of the proposed expansion of Marrickville Metro.

The current scheme represents a revision on a previously proposed expansion of Marrickville Metro. The revised scheme proposes a 16,767sqm increase in the GLA of the centre including a discount department store of 5,000sqm, an additional full line supermarket of 4,300sqm and 6,455sqm of additional specialty retail.

Pitney Bowes forecast a marginal turnover for the expansion of \$90m at 2013. For the purposes of this Economic Impact Assessment we will adopt this turnover estimate.

In terms of impact on individual centres, the Economic Impact Assessment identifies the following:

- The impact on Marrickville Road and Illawarra Road will be a 14% reduction in retail sales which is deemed to be a moderate impact. We do not expect the centre to be able to absorb a fall in turnover forecast of this level and remain viable. Vacancy rates in the centre are expected to increase to between 14% and 15%.
- The impact on Enmore is considered moderate at 12%. In all likelihood it is currently trading at least 20% below national average.
- The impact on Newtown will be 8% which is considered low to moderate. If permitted, the Marrickville Metro expansion would result in a rise in the proportion of vacant units in Newtown to around 10% to 15%;
- Petersham will experience a low to moderate impact of 6%. This will have significant implications for the centre given that it is currently underperforming by around 35% below national average.

The proposed development is expected to cause adverse impacts upon existing strip retailers located in and around the Marrickville Local Government Area and will place these facilities in financial jeopardy. This is likely to translate to increased vacancies in these centres from the current average of 7% to around 12% to 14%. Enmore, Newtown and Marrickville strip precincts will be most impacted by the proposed expansion.

Although the proposed development will create additional local employment in Marrickville Metro, these will be offset by job losses elsewhere. The net increase in net employment levels which would result is not deemed to be significant.



## 2. INTRODUCTION

Hill PDA has been commissioned by Marrickville Council to undertake an Economic Impact Assessment (EIA) of the proposed expansion of Marrickville Metro. Hill PDA completed a previous EIA into the proposed Marrickville Metro expansion in August 2010 on behalf of the Marrickville Chamber of Commerce. Since the original EIA was completed, the scheme has been revised. It is the impact of the revised scheme which is considered in this EIA.

### 2.1 The Site

The proposed expansion consists of three separate parcels of land;

- Victoria Road, Marrickville, a 3.6ha site currently utilised for the existing Marrickville Metro Centre.
- 13-55 Edinburgh Road, Marrickville, a 8,800sqm site currently occupied by an industrial building.
- A section of Smidmore Street (as an option to link the two sites above).

The site is bounded by Victoria Road to the north, Edinburgh Road to the south, Murray Street to the east and abuts a residential housing estate to the west. The site has a mix of applicable zonings including General Business 3a (existing Marrickville Metro Site) and General Industrial 4(a) (13-55 Edinburgh Road). The section of Smidmore Street is currently unzoned and is subject to purchase from the Marrickville Council. We understand that Council resolved not to consent to the disposal of any land or airspace for the expansion of the shopping centre.

Marrickville Metro currently comprises almost 23,000sqm of leasable floorspace (GLA), including a retail component of 21,061sqm. The centre is anchored by a Kmart discount department store of 7,311sqm, Woolworths supermarket of 4,910sqm and ALDI supermarket of 1,207sqm, and provides a further 7,633sqm of mini-majors and specialty stores.



Figure 1 - Approximate Site Location



Source: Urbis Preliminary Environmental Assessment, November 2009

## 2.2 The Proposal

The proposed expansion of Marrickville Metro would see a 16,767sqm increase in the GLA of the centre. The expansion would include provision for a second discount department store of 5,000sqm, an additional full line supermarket of 4,300sqm and 6,455sqm of additional specialty retail. Once completed Marrickville Metro would be a double discount department store centre with three supermarkets – a total of 39,700sqm of leasable floor space of which approximately 36,800sqm would be retail and approximately 2,885sqm would be commercial services as shown in the table below.

**Table 1 - Proposed Expansion (GLA sqm)**

Store Type	Existing	Proposed	Total
Dept Stores	7,311	5,000	12,311
Supermarkets	6,117	4,300	10,417
Mini-majors	1,138	1,991	3,129
Specialty Retail	6,795	4,464	10,959
Total Retail	21,061	15,755	36,816
Non-retail	1,572	1,312	2,885
<b>Total</b>	<b>22,933</b>	<b>16,767</b>	<b>39,700</b>

Source: Pitney Bowes, Marrickville Metro Economic Impact Assessment (November 2010)

The main differences between the current scheme and that previously proposed are:



- A 22% reduction (7,230sqm) in additional retail floor space sought;
- A 187-car reduction in the number of additional car parking spaces from 715 to 528;
- Removal of the Smidmore Road portion of the site;
- Deletion of all connecting structures to the new building in Edinburgh Road at and above ground level;
- Deletion of the spiral ramp on the corner of Victoria Road and Murray Street and retention of the car park access ramp on Murray Street;
- Relocation of loading dock access further south along Murray Street;
- Increased bus stop capacity, taxi parking and space for a community shuttle bus;
- Design changes along Smidmore Street to improve pedestrian conditions;
- Façade changes along Murray Street; and
- Retention of all Lemon Scented Eucalypts in Smidmore Street and Figs in Murray Street.

## 2.3 The Methodology

In determining a methodology for the assessment of the economic impact of the proposal it is important to consider the principles outlined in the relevant statutes. Demonstrating over or under supply of retail space within a given area is not the relevant matter, although it may have consequential impacts that would be considered by the Land and Environment Court.

The relevant matter is the impact on retail centres as a whole, whether or not it will result in social detriment and whether or not the application will make good for that loss.

In undertaking this Study, our methodology was based on the above principles and the following scope of works:

- A site appraisal;
- A review of the Part 3A development application, paying particular attention to the Economic Impact Assessment accompanying the application.
- The determination of supermarket floor space and other major retailers within the trade areas;
- The determination, location and intensity of competing retail stock in the pipeline within the surrounding area;
- The identification of the primary and secondary trade areas based on distances, accessibility and the location and level of retail offering in other centres;
- A review of data derived from the ABS Census, DoP, Council and other sources, to develop a profile of key demographic characteristics in the Marrickville Metro primary and secondary trade areas (population, household characteristics and lifestyle trends);
- An update of population and household growth in the trade areas from Council and/or NSW government (MDP or other) sources;



- The determination of forecasts for household expenditure by trade area by retail store type and the quantification of levels of under or over supply based on national benchmark turnover levels;
- An estimate of the turnover of the proposed centre and the likely redistribution from existing and planned retail centres. The measurement of impacts as shifts in turnover over time taking into consideration growth in expenditure in the trade area; and
- A consideration of whether or not impact on existing/proposed retail centres is significant and/or detrimental and, if so, whether or not means could be used to mitigate that harm.

### 3. ANALYSIS OF EXISTING CENTRES

To provide the relevant context for the EIA, this Chapter includes an overview of surrounding centres that would be impacted upon by the proposed expansion of Marrickville Metro.

#### 3.1 Supply of Retail Floor Space

The existing supply of retail floor space is measured by combining the number of stores and their respective floor space (in square metres). Floor space is a measure of lettable area (the area leased by a store operator, inclusive of office and storage space) and excludes common areas, plant rooms and loading docks. In the case of indoor centres such as Marrickville Metro, it includes the floor space leased to shop owners, but excludes elements such as common areas, car parking, toilets, plant rooms and fire egress.

The number of business in retail centres is provided below.

**Table 2 - Number of Establishments in Retail Centres in the Locality by Retail Store Type**

Location	Supermarket	Dept Store	Specialty Shops	Total Retail	Shop Front Commercial	Vacant	Total Shop Front
Marrickville (Marrickville Rd & Illawarra Rd)	3	0	209	212	90	27	329
Canterbury	1	0	41	42	9	27	78
Campsie	2	3	229	234	51	7	292
Clemon Park	0	0	11	11	4	3	18
Dulwich Hill	1	1	117	119	26	5	150
Earlwood	1	0	100	101	26	2	129
Hurlstone Park	1	0	37	38	16	12	66
Summer Hill	1	0	52	53	12	0	65
Enmore	0	0	114	114	35	7	156
Petersham	0	0	41	41	28	13	82
Newtown	2	0	390	392	82	34	508
Broadway Shopping Centre	1	3	156	160	15	0	175
<b>Total Shop front</b>	<b>13</b>	<b>7</b>	<b>1,497</b>	<b>1,517</b>	<b>394</b>	<b>137</b>	<b>2,048</b>

Notes: Above excludes automotive businesses including petrol outlets. Commercial refers to shop front commercial users such as real estate agents and banks. It excludes stand alone commercial buildings and shop top commercial space.

Sources: Australian Property Council Shopping Directory, Pitney Bowes 2009 and Hill PDA Floor Space Surveys 2010

The total retail floor space in the Marrickville area is provided in the table below:



**Table 3 - Total Floor Space in Retail Centres in the Locality by Retail Store Type 2010 (sqm)**

Location	Supermarket	Dept Store	Specialty Shops	Total Retail	Shop Front Commercial	Vacant	Total Shop Front Space
Marrickville (Marrickville Rd & Illawarra Rd)	5,050	0	22,600	27,650	13,250	2,075	42,975
Canterbury	1,500	0	3,462	4,962	759	2,279	8,000
Campsie	3,677	10,482	15,855	30,014	3,217	490	33,721
Clemon Park	0	0	963	963	350	262	1,575
Dulwich Hill	2,100	648	6,698	9,446	1,487	285	11,218
Earlwood	1,800	0	12,684	14,484	3,265	251	18,000
Hurlstone Park	300	0	4,617	4,917	1,942	1,490	8,349
Summer Hill	1,728	0	2,746	4,474	627	0	5,101
Enmore	0	0	8,155	8,155	4,690	725	14,095
Petersham	0	0	3,335	3,335	4,185	3,055	10,575
Newtown	1,688	0	33,340	35,028	10,858	2,570	48,456
Broadway Shopping Centre	3,974	14,454	21,227	39,655	1,500	0	41,155
<b>Total</b>	<b>21,817</b>	<b>25,584</b>	<b>135,682</b>	<b>183,083</b>	<b>46,130</b>	<b>13,481</b>	<b>243,219</b>

Notes: Above excludes automotive businesses including petrol outlets. Commercial refers to shop front commercial users such as real estate agents and banks. It excludes stand alone commercial buildings and shop top commercial space.

Sources: Australian Property Council Shopping Directory, Pitney Bowes 2009 and Hill PDA Floor Space Surveys 2010

## 3.2 Marrickville Metro

The existing retail offer within Marrickville is split into three separate precincts, the existing Marrickville Metro shopping centre and two retail strips, one along Marrickville Road and the other along Illawarra Road.

In its present state Marrickville Metro consists of a 19,980sqm sub-regional shopping centre featuring a full line Woolworths supermarket (4,910sqm), ALDI supermarket (1,207sqm), Kmart (7,311sqm), 6,522sqm of retail specialities and parking for 1,100 cars. According to Marrickville Metro owners AMP Capital, the centre achieved \$204.1m million in turnover in the 12 months to December 2009, equating to \$10,245/sqm<sup>1</sup>. Its turnover was reported in the Shopping Centre News (SCN) Little Guns 2010 at \$206.8m. In terms of turnover per square metre it is the third highest ranking centre out of all 88 "Little Guns" centres in the SCN (defined as centres between 20,000sqm and 45,000sqm) and 47% above median.

## 3.3 Marrickville

The Marrickville strip retail centre is "T" shape with the head of the "T" stretching 700m along Marrickville Road from Meeks Road to Petersham Road. The remaining strip stretches 450m along Illawarra Road from Marrickville Road to the train station. The retail strip continues a further 400m south from the Train Station to the Woolworths supermarket at the corner of Renwick Street. This part is often referred to as Marrickville South. Whilst Marrickville South may be defined as a separate centre there is little break in the continuity of retail with the remainder of the centre. Therefore we have included it as part of the Marrickville strip retail centre in our impact assessment. At its closest point (corner of Marrickville Road and Meeks Road) Marrickville shops are 1.5km by road from Marrickville Metro.

<sup>1</sup> Pitney Bowes Business Insight, Marrickville Metro Economic Impact Assessment.

The retail properties along Marrickville Road, being the traditional centre of Marrickville are higher quality than the retail properties along Illawarra Road, with the aesthetics of the centre boosted by a divided two lane road and alfresco seating areas in front of many of the Cafés. The overall mix of retailers includes food and grocery, personal services, restaurants and Asian groceries. There are also 18 clothing stores and five bulky goods retailers. A similar mix of retailers fronts both sides of Illawarra Road including food and grocery, personal services and restaurant/fast foods. There are fewer clothing and comparative goods stores.

Anchor tenants in the Marrickville strip centre include a 1,500sqm Foodworks supermarket on Illawarra Road and a Bing Lee electrical goods retailer (approximately 1,000sqm) at number 326 Marrickville Road. The 2,800sqm Woolworths Supermarket is at the southern end of the strip centre on Illawarra Road between Warren Road and Renwick Street.

### 3.4 Canterbury

The existing retail offer in Canterbury consists of a number of strip shops along Old Canterbury Road and a 1,500sqm ALDI supermarket located on Jeffery Street. With the exception of the ALDI store, the existing offering is limited, with many of the shops along Canterbury Road in poor aesthetic condition and/or currently vacant. While the centre benefits from strong transportation links including a train station in close proximity, the enforced clearways along Old Canterbury road severely limits exposure and impedes vehicular access to the centre. A post office is located here.

An external vacancy survey along some 400m of Old Canterbury Road (200m on either side of the train station) at August 2010 reveals that almost 40% of the shops are either used as commercial premises or are vacant and closed.

### 3.5 Campsie

Campsie is located approximately 8.7km from the subject site. The centre which spreads across both sides of the Bankstown railway line is characterised by a sub-regional shopping centre (Campsie Centre) with a large number of strip based retail located along Beamish Street.

Campsie Centre (13,068sqm) is anchored by a 1,177sqm Food for Less supermarket and a 7,662sqm Big W. In addition to these larger tenancies the centre also features a post office, RTA outlet, chemist, over 50 specialty stores and enclosed parking for up to 800 vehicles.

In addition Campsie also features a freestanding 2,500sqm Woolworths supermarket and a large number of strip based retailing, predominantly located along Beamish Street. The strip provides for a number of commercial services oriented businesses including banks and real estate agents, as well as providing a number of restaurants and speciality food retailers.

The Campsie Retail Centre as a whole is in need of revitalisation, with many of its stores showing signs of dating and underperformance. It is noted that there is a substantial redevelopment of Civic Centre planned, which will help to lift the profile of and boost performance of the centre.



### 3.6 Clemton Park

Clemton Park is located approximately 7.5km from the subject site, the centre featuring a small number of strip based shops located along William Street anchored by a large stand alone bottle shop.

There is currently a proposal to develop the former Sunbeam factory in Clemton Park for residential and retail uses. This is discussed in section 2.11.

### 3.7 Dulwich Hill

There are two distinct retail centres within Dulwich Hill, one located along New Canterbury Road (4.2km from subject site) and a second located around the Dulwich Hill train station (3.7km from subject site), both offering similar strip based centres.

The centre located along New Canterbury Road is anchored by a 2,100sqm Franklins supermarket and features a 648sqm discount department/variety store, in addition to a number of smaller retail tenancies.

In addition to a high proportion of commercial services, the centre at Dulwich Hill train station features a large number of non-food based retailers and a small (300sqm) Riteway supermarket/convenience store.

### 3.8 Earlwood

The Earlwood centre is located approximately 6.2km from the subject site and is anchored by a 1,800sqm freestanding Coles supermarket. In addition to the supermarket, Earlwood features a large number of strip based retail tenancies predominantly located along Homer St, the majority of which provide non-food related services with only nine of the 129 specialty retailers offering food related services.

### 3.9 Hurlstone Park

Similar to Dulwich Hill, Hurlstone Park features two distinct retail strip centres, one located along New Canterbury Road (5.7km from subject site) and the other located around Hurlstone Park train station (5.6km from subject site).

The retail offering along New Canterbury Road is characterised by a number of restaurants and other non-food speciality retailers. In addition to the strip retailers, there is also a 7-11 service station with a small convenience based shop attached.

The centre located nearby the Hurlstone Park train station is characterised by a number of convenience based retail stores which are currently in poor condition and assumed to be underperforming national benchmarks.

### 3.10 Summer Hill

The retail centre at Summer Hill is approximately 4.4km from the subject site. The centre which is located near Summer Hill train station is anchored by a 1,728sqm freestanding Franklins supermarket, in addition the centre also features a large deli (600sqm) attached to the Franklins supermarket and a number of strip based retail specialties.

### 3.11 Enmore

The Enmore strip shops stretch from King Street to Stanmore Street. Its closest point to Marrickville Metro at Stanmore Street is 1.1km from the proposed development. The centre provides a broad mix of retailing types including a large proportion of restaurants and personal services retailers, a community food co-operative and two small convenience based supermarkets.

### 3.12 Petersham

The strip shops located along New Canterbury Road, Petersham are located approximately 2.5km from the Marrickville Metro site. The centre is predominately restaurant focused, with this retail type accounting for the majority retailers within Petersham. In addition the centre also features a small Foodworks convenience store of approximately 170sqm. Presently the centre is characterised by the former Majestic Theatre, there are however, plans to develop this site for residential and ground floor retail uses.

### 3.13 Newtown

The Newtown retail strip is commonly referred to as a 'prime retail strip'. The strip straddles the Newtown train station which is located approximately 1.9km from the subject site, although the southern end of Newtown is only 1km from Marrickville Metro. Newtown features a wide range of both national and independent retailers. Much of the stores located to the north of the Newtown train station are high quality fashion/apparel based retailers, while those to the south of the train station are generally feature lower quality fit-outs and are more typical of traditional suburban retail strip shops. Vacancies are more common towards the southern end of the strip centre, which is closer to Marrickville Metro.

The centre also features a standalone 900sqm Franklins supermarket and a small 1,500sqm shopping centre "Newtown Central" which is anchored by a 788sqm Foodworks shopping centre.

Newtown is less likely to be impacted by Marrickville Metro than other strip centres largely because of its retail mix. It has an alternative and a quasi-tourist role with its array of a-la-carte and specialty restaurants, lifestyle and bohemian specialty food and non-food stores.

### 3.14 Broadway Shopping Centre

Broadway Shopping Centre is a Regional Centre (as defined under the PCA directory) located approximately 3.5km from Marrickville Metro. The 41,155sqm centre is the largest centre in the immediate area surrounding Marrickville Metro. It features three discount department stores totalling 14,454sqm, a full-line Coles supermarket, 171 retail speciality stores, a Hoyts cinema, Gymnasium and parking for 1,870 cars.

In the 12 months to December 2009, the Broadway Shopping centre recorded a moving annual turnover of \$9,087/sqm, ranking it second of 88 similar sized centres within Australia (as reported by Shopping Centre News).



### 3.15 Other Centres

Other retail centres in potential competition with the proposed centre at Marrickville include Ashfield Mall – a 25,125sqm sub-regional shopping centre featuring a Coles, Woolworths and Franklins supermarket.

### 3.16 Proposed Centres

There are currently a number of proposed retail developments in the locality including the following.

- Former Sunbeam Site, Clemton Park – a mixed use retail and residential development totalling 61,935sqm in size. If developed the site will feature a 2,751sqm supermarket and up to 4,001sqm of specialty retailing. The site is currently for sale with concept plan approval.
- Campsie Civic Centre, Campsie – The mixed use redevelopment of the Campsie civic centre on Beamish Street will consist of residential, council chambers, library, commercial and function centre building totalling 36,204sqm. The proposed retail component will comprise of a supermarket and specialty retailers totalling 6,640sqm. A draft masterplan has been finalised by Canterbury Council.
- Green Square Town Centre will have around 45,000sqm of retail space when developed with the Gazcorp and Choker sites included around the Green Square railway station. The State Government will develop the land east of the railway station with 26,000sqm of retail space. The mix is likely to include a discount department store and one or two large supermarkets.
- The Gazcorp site on Botany Road Shopping Centre near Green Square Station will be a mixed use building, with 14,900sqm of retail space anchored by a discount department store of 5,500sqm and a supermarket of 3,500sqm. This development has been approved. Gazcorp sort for an increase in floor space to approximately 23,700sqm which was refused by the Land and Environment Court.
- 78-79 Old Canterbury Road, Lewisham – a 51,137sqm mixed use residential and retail development comprising of a 3,434sqm supermarket, a 1,116sqm fruit and vegetable market and 3,878sqm of retail specialties. The proposal has been submitted to NSW Department of Planning for major planning assessment. In addition, the surrounding area is subject to a masterplan which envisages significant future retail and commercial development.
- Allied Mills, Summer Hill – a scheme has been submitted to the NSW Department of Planning, and subsequently Director Generals Requirements have been issued, to the proponent. The scheme proposes between 2,500sqm to 2,800sqm of retail floorspace on the site, which is located in Ashfield LGA. It is situated adjacent to the 78-70 Old Canterbury Road site in Lewisham. 23 Erskineville Road Newtown is a proposed conversion of a former warehouse into a 900sqm supermarket. This project was granted development approval in September 2009.
- It is anticipated that the Erskineville/Ashmore industrial precinct will ultimately have a shopping centre or around 5,000sqm anchored by a supermarket. Other centres in Green Square area

include Victoria Park (around 12,000sqm with a full-line supermarket). Danks Street also has some capacity for further expansion of retail space.

- A 39,000sqm IKEA store on the Princes Highway in Tempe is due to open in 2011. This store is only 3km by road from Marrickville Metro and will provide some competition with the department stores and other larger retailers.

Proposed centres – particularly those centres east of Kings Street (Princes Highway) - will result in some contraction in Marrickville Metro's trade area. In addition, approved DCP for Hurstville allows for a 3,500sqm supermarket and 1,000sqm of additional retail floorspace on the Mashman Site in Kingsgrove.



## 4. DEMAND FOR RETAIL SPACE

### 4.1 Trade Area Definition

For the purpose of this report we have reviewed the Marrickville Metro Trade Area defined by Pitney Bowes Business Insight (PB), in the revised Economic Impact Assessment accompanying Part 3A development application.

We note that despite a 22% reduction in the quantum of retail floorspace proposed in the revised scheme the trade areas used by PB remain unchanged from those used previously. We agree with this approach. Given that a full-line supermarket and a discount department store remain the anchors of the scheme, and in light of the high level of speciality store floorspace proposed, it is likely that the attraction and draw of the centre would remain unchanged from that originally proposed despite the reduction in floorspace.

The PB report utilises a main trade area which encompasses a primary trade area (PTA) and three secondary trade areas (STA) which generally extend between 2.0km—3.5km from the Marrickville Metro Centre site. Four further tertiary trade areas are identified which are located beyond the main trade area.

The report while detailing the broad determinants of a trade area, does not define what is meant by PTA and STA. For the purposes of this assessment we will define the PTA as the area within which the majority of household expenditure by type of expenditure (food and groceries, bulky goods, etc) generated is captured by Marrickville Metro. Alternatively it is the centre where most expenditure is directed to from within the PTA. The STA of the centre is defined as the area outside the PTA where a reasonable but minority level of expenditure is captured by Marrickville Metro.

Given the above, we accept the overall definition of the main trade area in the PB report. We note, however, that no clearer breakdown of the constitution of the PTA and STA has been provided by PB. This is despite our comments on the previous scheme.

The key findings from our review of the main trade area are as follows:

- The division between the primary trade area and the northern secondary trade area is reasonable given the physical barriers presented by the Inner West railway line.
- The division between the primary trade area and the STA East is reasonable given the delays and inconvenience in crossing King Street / Princes Highway.
- The division between the PTA and STA South is inconsistent without any physical or convenience deterrent barrier. The STA South comes within 500m away from Marrickville Metro, which is within walking distance. Note that the PTA as defined by Pitney Bowes passes through the strip shopping centre on Marrickville Road.
- The Western boundary of the PTA is more than 4km by road from the subject site to the goods railway line. This is some four times the distance of that to the southern boundary. There is no secondary or tertiary trade area further westward. In other words the PTA abruptly stops at a boundary beyond which there is virtually no trade influence. If there was a clear barrier of separation that may be understandable but in this case there are five easily accessible roads that

cross the goods line along the boundary. The PTA should have been defined more locally terminating at Wardell Road or Livingstone Road with a STA West to the west of that boundary.

- Finally the PB report identifies an extensive secondary and tertiary trade area to the east and south east encompassing almost the whole of the South Sydney and Botany Bay LGAs. It should be recognised that Marrickville Metro is likely to have limited influence in this area given the travel times and the inconvenience of alternative routes. The Secondary East Trade Area encompasses the suburbs of Erskineville and Alexandria and the Tertiary TA includes Waterloo, Redfern, Zetland and Rosebery. It is likely that Eastgardens and Bondi Junction is capturing far more expenditure from these localities than Marrickville Metro given the better access times and improved convenience. It's also essential to recognise that a significant level of retail space is planned to service these localities with around 45,000sqm in the Green Square Town Centre (including Gazcorp and the Choker site), 5,000sqm for Erskineville Ashmore Estate and in other centres such as Victoria Park. As a result Marrickville Metro's trade area will contract in the east.

## 4.2 Demographics

The socio-economic profile detailed in the PB report is based upon the results of the 2006 Australian Census. As such it is not necessary to undertake a separate demographic analysis. While there is some disagreement on the trade area definition, we have adopted the broad conclusions of the PB report, detailed below:

- The average age of the total trade area residents, at 37.2 years, is slightly older than the Sydney metropolitan benchmark of 36.6 years.
- The total trade area residents earn income levels which are higher than the comparable Sydney metropolitan benchmarks on both a per capita and per household basis, by 19.3% and 6.9%, respectively. Note however that localities in Leichhardt and Sydney City LGAs enlarged those differences considerably. The average individual income level in the PTA is only 9% higher than Sydney SD.
- The trade area population contains a high proportion of overseas born residents. This trend is consistent across all trade area sectors.
- Home ownership levels in the total trade area are low, at 51.7%.

There is a significantly below average proportion of traditional families (i.e. couples with dependent children) in the main trade area, as well as an above average proportion of lone person households compared to Sydney SD.

## 4.3 Population Growth

The PB report suggests that the main trade area population is forecast to grow by 8,325 people from 2009-2021, equating to an annual growth rate of 0.72%. This growth is in line with the population growth expected in the broader Marrickville area, with the NSW Government Bureau of Transport Statistics forecasting an annual growth rate of 0.70% pa from 2006-2021 for the Marrickville SLA.

Analysis of the population projections provided in the PB report indicate that the majority of the population growth within the main trade area is not expected to come from the PTA, but rather strong growth in the secondary trade areas, predominantly the Eastern STA. Given secondary trade area residents spend the majority of their retail expenditure at centres other than Marrickville Metro, it is not expected that the centre will benefit highly from an



increase in population of these secondary trade areas. The benefit of growth in the eastern STA and TTA will be captured mainly by the proposed centres, particularly Green Square and the Erskineville Ashmore Precinct.

## 4.4 Household Expenditure

The PB report quotes household expenditure estimates sourced from Market Data Systems, MarketInfo 2009 database. A comparison of these estimates, with the expenditure estimates provided by the HillPDA bespoke expenditure model (which utilises MarketInfo 2009), revealed that the base estimates detailed in the PB report are in line with what is expected in the Marrickville Region.

The Expenditure detailed in the Pitney Bowes report is provided in the following table.

**Table 4- Trade area household expenditure 2009-2021 (\$2009)**

June	Primary Sector (\$m)	Secondary Sectors (\$m)				Tertiary Sectors (\$m)				Total TA
		North	East	South	Main TA	North	East	Sth-east	Sth-west	
2009	531.9	246.2	333.1	210.2	1,321.5	602.7	315.9	340.3	359.7	2,940.1
2010	538.1	250.4	345.9	211.8	1,346.2	611.8	327.1	350.3	363.3	2,998.8
2011	544.8	254.3	357.5	214.2	1,370.9	620.9	337.8	361.2	367.2	3,058.0
2012	552.3	258.1	368.4	216.8	1,395.7	630.2	347.9	372.1	371.4	3,117.2
2013	560.6	261.7	378.6	219.6	1,420.5	639.6	357.4	383.1	375.7	3,176.2
2014	569.0	265.4	389.0	222.4	1,445.8	649.1	367.1	394.4	380.0	3,236.5
2015	577.5	269.1	399.8	225.3	1,471.7	658.8	377.1	406.0	384.4	3,298.0
2016	586.2	272.9	410.8	228.1	1,498.0	668.6	387.4	418.0	388.9	3,360.9
2017	594.9	276.6	421.5	231.0	1,524.0	679.3	397.0	430.0	393.4	3,423.6
2018	603.7	280.1	431.7	234.0	1,549.5	690.9	405.9	442.0	398.0	3,486.2
2019	612.7	283.6	442.1	237.0	1,575.4	702.7	415.0	454.2	402.6	3,550.0
2020	621.8	287.2	452.8	240.0	1,601.8	714.8	424.3	466.9	407.3	3,615.0
2021	631.0	290.9	463.8	243.0	1,628.7	727.0	433.8	479.9	412.0	3,681.4
<b>Expenditure Growth (\$m)</b>										
2009-2011	12.9	8.1	24.4	4.1	49.4	18.2	21.9	20.9	7.5	117.9
2011-2016	41.3	18.6	53.3	13.9	127.1	47.6	49.6	56.8	21.7	302.8
2016-2021	44.9	17.9	53.0	14.9	130.7	58.4	46.5	61.8	23.1	320.5
2009-2021	99.1	44.6	130.7	32.9	307.3	124.3	117.9	139.6	52.3	741.3
<b>Average Annual Growth Rate</b>										
2009-2011	1.2%	1.6%	3.6%	1.0%	1.9%	1.5%	3.4%	3.0%	1.0%	2.0%
2011-2016	1.5%	1.4%	2.8%	1.3%	1.8%	1.5%	2.8%	3.0%	1.2%	1.9%
2016-2021	1.5%	1.3%	2.5%	1.3%	1.7%	1.7%	2.3%	2.8%	1.2%	1.8%
2009-2021	1.4%	1.4%	2.8%	1.2%	1.8%	1.6%	2.7%	2.9%	1.1%	1.9%

Source: Pitney Bowes Business Insight, Marrickville Metro Economic Impact Assessment 2010 Table 3.4

The PB report forecast future household expenditure based upon the expected annual growth in retail spending of 1.0% per capita and the population growth expected in each of the trade areas (around 0.7% per annum for the primary trade area). These assumptions are consistent with historic trends and with the latest DoP population forecasts for the LGA.

Reflecting the relatively low levels of population growth within the PTA, the report highlights that expenditure growth is expected to be limited in the PTA, growing by only \$99.1m from 2009-2021 equating to an annual growth rate of 1.4%. The report further indicates that the majority of growth within the main trade area is expected to come from the eastern trade area, which is forecast to grow by 2.8%pa from 2009-2021. Given the level of new retail development within the eastern trade area (particularly in Erskineville and Green Square), it is expected that much of this expenditure growth will be directed towards these new stores rather than Marrickville Metro.

## 4.5 Existing Market Share

The PB report estimates the market share of the existing centre, by taking the most recent turnover figures from Marrickville Metro and comparing these to the available expenditure in each of the trade areas. More specifically the PB reports details this process as follows:

- i. Total retail sales for the centre (for the 12 months to December 2009) including major stores, mini-majors and retail specialty shops, were approximately \$204.7 million (including GST). These sales were based on information provided by AMP and exclude non-retail items such as travel agents and lotto sales. The total sales of each component of the centre are split into their respective retail product categories, taking into account the typical sales distribution for each type of retailer (food and non-food etc).
- ii. The total sales that are generated by the centre from each trade area sector are then similarly split into each product category.
- iii. The total available expenditure within each trade area sector is calculated by product category, based on the MarketInfo estimates.
- iv. The market share achieved by the centre across each trade area sector is then calculated by dividing (ii) above by (iii).<sup>2</sup>

The above market share calculation does not clearly indicate how the total sales that are generated from each trade area sector are calculated, in Table 5.1 of the report it indicates that approximately 48.4% of the centres sales are secured from the primary trade area, while 31.4% is captured from the secondary trade area with the remaining 20.2% captured from residents located in the tertiary trade area and outside the total trade area. Given the implications that this figure have on the calculation of market share, it is vital that this base calculation is understood.

## 4.6 Forecast Market Share

The PB report forecast market share in much the same way as they estimate existing market share, as such the same limitations apply to the interpretation of the forecasted market share breakdown. Analysis of these figures indicates that it is expected that the expansion of the Marrickville Metro, will result in a fall in the proportion of the centres sales captured from the PTA and a slight rise in the proportion of the centres sales captured from the secondary trade area. From this it can be seen that the performance of the centre will be dependent upon capturing an increased proportion of sales from the secondary trade area, with 33.0% of all sales expected to come from this trade area.

<sup>2</sup> Pitney Bowes Business Insight, Marrickville Metro Economic Impact Assessment 2010.



## 5. RELEVANT PLANNING CONSIDERATIONS

### 5.1 Local Planning Instruments

#### Marrickville Local Environmental Plan 2001

The proposed development falls under the Marrickville Local Environmental Plan (2001) (MLEP). The objectives of the MLEP as it relates to this development include maximising “business and employment opportunities, particularly in Marrickville’s existing commercial centres”.

#### Marrickville Urban Strategy

The Marrickville Urban Strategy was adopted by the Marrickville Council in April 2007. The strategy, which was formulated on work undertaken by SGS Economics and Planning, provides the planning context for the future development within the Marrickville LGA. Its primary purpose was to inform the review and rationalisation of councils planning controls, aiding in the production of a comprehensive planning strategy and new Local Environmental Plan (LEP).

Marrickville Urban Strategy identifies 16 local centres within the Marrickville LGA, of these centres Marrickville Metro is classified as a “standalone shopping centre”, Marrickville Rd is classified as a “Village” and Marrickville Station is classified as a “Small Village”.

The strategy provides some principles in land use transport integration. Objective 5 of the strategy, promotes ***“focused development in areas within walking distance of centres and public transport.”*** Therefore development should be focused in areas with strong public transport infrastructure. This would include Dulwich Hill Station, Petersham, Lewisham, Marrickville Station, Newtown and St Peters.

The proposed expansion of Marrickville Metro conflicts with the strategy to the extent that it will redirect expenditure away from the existing centres around the train stations to the “standalone” centre.

### 5.2 Section 79C of the EPA Act

In determining any development application under the Environmental Planning and Assessment Act Council is obliged to take into consideration a number of matters including Section 79C(1)(b) in relation to the likely economic and social impacts of the proposal in the locality.

Land and Environment Court judgements have provided guidance on relevant matters in relation to the economic and social impact of proposed retail facilities.

In *Fabcot Pty Ltd v Hawkesbury City Council* (97) LGERA, Justice Lloyd noted “economic competition between individual trade competitors is not an environmental or planning consideration to which the economic effect described in s 90(1)(d) is directed. The Trade Practices Act 1974 (Cth) and the Fair Trading Act 1987 (NSW) are the appropriate vehicles for regulating competition. Neither the Council nor this Court is concerned with the mere threat of economic competition between competing businesses.... It seems to me that the only relevance of the economic impact of a development is its effect ‘in the locality’...”.

In *Kentucky Fried Chicken Pty Ltd v Gantidis* (1979) 140 CLR 675 at 687 Justice Stephen noted that “if the shopping facilities presently enjoyed by a community or planned for it in the future are put in jeopardy by some proposed development, whether that jeopardy be due to physical or financial causes, and if the resultant community detriment will not be made good by the proposed development itself, that appears to me to be a consideration proper to be taken into account as a matter of town planning... However, the mere threat of competition to existing businesses if not accompanied by a prospect of a resultant overall adverse effect upon the extent and adequacy of facilities available to the local community if the development be proceeded with, will not be a relevant town planning consideration.”

The Court has stated that Councils should not be concerned about competition between individual stores as this is a matter under fair trading. But it should concern itself with impact on established retail centres. The impact on competing stores and businesses is only relevant if the viability of those businesses are threatened and the viability of a retail centre as a whole is threatened due to a demonstrated nexus between the competitive stores and the other retailers within the retail centre.

The principles were reiterated by Justice Pearlman in *Cartier Holdings Pty Ltd v Newcastle City Council and Anor* [2001] NSWLEC 170. “It follows that Section 79C(1)(b) does not require the consent authority to take an approach in consideration of the relevant matter different from the approach formerly taken in the application of 90(1)(d).”

Note that in *Fabcot v Hawkesbury City Council* (97) LGERA the court refused the application on the grounds of adverse economic impact. The court viewed the proposed Woolworths Marketplace in South Windsor would redirect considerable expenditure away from Windsor town centre. The existing supermarket in Windsor would experience considerable loss in trade with the possibility that it would cease trading. Competition with an individual retailer is not a relevant consideration. However in this case the retailer is an anchor tenant and the existing specialty stores had developed a strong nexus relationship with it over time. Closure of the supermarket would result in further closures and likely social detriment.

The “Fabcot” case as it became known has become an important test for assessing development applications for either new centres or the expansion of existing retail outlets.

### 5.3 Former Draft SEPP 66

The strategy of Draft SEPP 66 seeks to achieve “the better integration of land use and transport planning at the local level” particularly in relation to the preparation of environmental planning instruments development control plans and the like and the consideration of development applications. The Policy aims to ensure that urban structure, building forms, land use locations, development designs, subdivision and street layout help achieve the following planning objectives:

- a) improving accessibility to housing, employment and services by walking, cycling, and public transport,
- b) improving the choice of transport and reducing dependence solely on cars for travel purposes,
- c) moderating growth in the demand for travel and the distances travelled, especially by car,
- d) supporting the efficient and viable operation of public transport services,
- e) providing for the efficient movement of freight.



Draft SEPP 66 has been superseded by the Draft Centres Policy but the sound planning principles remain. The purpose of the SEPP was to ensure that land uses are located with the public transport infrastructure. It is about intensifying urban development around high volume public transport – particularly heavy rail. Retail uses are one of the highest value forms of development in financial terms, in terms of worker density, business activity and people generation. It is for these reasons that retail uses are encouraged, and protected, around the railway stations.

The proposal undermines the principle because Marrickville Metro is not at a railway station. The other centres in the locality being Newtown, Enmore, Petersham and Marrickville are all centres that were developed in the first half of the last century around railway stations. If the expansion of Marrickville Metro draws trade away from these other centres then it is a clear case of redistribution of economic activity away from public transport infrastructure.

## 5.4 NSW Draft Centres Policy

The Policy was released in April 2009 recognising that the market is best placed to determine the need for development and the supply of available floor space to accommodate demand. The role of the planning system is to accommodate this need whilst regulating its location and scale.

In light of these fundamental principles, the Draft Centres Policy focuses around six key principles. The principles relate to:

1. The need to reinforce the importance of centres and clustering business activities;
2. The need to ensure the planning system is flexible, allows centres to grow and new centres to form;
3. The market is best placed to determine need. The planning system should accommodate this need whilst regulating its location and scale.
4. Councils should zone sufficient land to accommodate demand including larger retail formats;
5. Centres should have a mix of retail types that encourage competition; and
6. Centres should be well designed to encourage people to visit and stay longer.

Whilst the proposed expansion of Marrickville Metro does not necessarily undermine objectives 2 to 6 above it does undermine the first principle which relates to the former Draft SEPP 66 objective. In relation to principle 4 we note that for this development application, given the impacts of the proposed development identified in the following chapter, the planning system should regulate the location and scale of the proposal.

## 6. IMPACT OF PROPOSAL

This section assesses the impact of the proposed centre on retail centres in the locality. The EPA Act is not clear on what is meant by locality but for the purpose of this assessment we have assumed it to be the trade area or the geographical influence of the proposal.

### 6.1 Methodology

The methodology we have adopted in measuring impact is as follows:

- assess the marginal turnover from expansion of the centre;
- estimate the redistribution of turnover from competing centres;
- estimate the loss in trade from competing centres as a percentage of current trade;
- consider shifts in turnover over time taking into consideration growth in the broad trade area; and
- consider the ability of those competing centres to absorb the impacts based on current trading performances; and
- consider whether or not impact on existing/proposed retail centres is significant and/or socially detrimental and, if so, whether or not means could be used to mitigate that harm.

### 6.2 What are the Losses in Trade?

PB estimates a marginal turnover of \$90m. This is equivalent to around \$13,660/sqm marginal turnover for the supermarket space, \$3,000/sqm for department store space, \$6,500/sqm for mini-majors and \$8,600/sqm for specialties. The marginal turnover of the DDS space is low. However the average turnover level of the supermarket space post expansion will remain above the industry benchmark.

Note that a marginal turnover of \$90m will result in an 18% fall in average turnover per square metre. There is some potential for Marrickville Metro to trade at a higher figure (which would result in stronger economic impacts) but for the purpose of this analysis we have adopted the figure of \$90m to test the impacts.

Assuming the proposed development proceeds, the net increase in retail turnover of \$90m identified above will be captured from competing centres. In order to quantify the scope of this turnover capture from existing competing centres Hill PDA prepared a bespoke gravity model. The main principles in the gravity model are that:

1. Like for like stores compete with one another. That is the new supermarket will compete with existing supermarkets in the locality, the new or expanded food hall will compete with existing restaurants and take-away food stores in the locality and likewise with specialty foods and specialty non-foods and department stores,
2. The level of redirected expenditure from a centre is directly proportional to the turnover of that centre. Hence more expenditure will be drawn from a centre that has higher trading levels;



3. The level of redirected expenditure from a centre is indirectly proportional to the distance squared from Marrickville Metro. This is based on the premise that shoppers will try to minimise distance, time and travel costs when travelling to undertake shopping.

The impact is summarised in the table below.

**Table 5- Impact Assessment Redirection of Turnover of Existing Centres 2009-2013 (\$m2009)**

Retail Centre	Distance from Subject Site (km)	Approx. Retail Floor Space*	Turnover in 2009	Turnover in 2013 without Proposal	Turnover in 2013 with Proposal	Immediate Shift in Turnover	% Shift in Turnover in 2013	Shift in turnover from 2009 to 2013	% Shift in turnover from 2009 to 2013
Marrickville Metro Expansion					90.0	90.0			
Marrickville (Marrickville and Illawarra Roads)	2.0	28,450	140.0	149.8	128.4	-21.3	-14.3%	-11.6	-8.3%
Enmore	1.4	8,700	36.7	39.3	34.8	-4.5	-11.5%	-1.9	-5.3%
Newtown	1.9	35,050	171.3	183.2	167.9	-15.3	-8.4%	-3.4	-2.0%
Petersham	2.8	3,600	12.0	12.8	12.1	-0.7	-5.5%	0.1	1.0%
Dulwich Hill (Station)	3.7	800	3.6	3.9	3.7	-0.2	-5.4%	0.0	1.2%
Dulwich Hill (New Cant. Rd)	4.2	8,650	34.2	36.6	34.5	-2.0	-5.6%	0.3	1.0%
Hurlstone Park (Station)	5.7	2,350	12.9	13.8	13.5	-0.3	-2.3%	0.6	4.6%
Hurlstone Pk (New Cant. Rd)	5.7	2,600	12.2	13.1	12.9	-0.2	-1.4%	0.7	5.5%
Erskineville	2.4	3,100	6.3	6.7	6.3	-0.4	-6.0%	0.0	0.5%
Broadway	4.4	41,150	378.8	405.2	382.4	-22.8	-5.6%	3.6	1.0%
Norton Plaza	4.3	8,400	56.5	60.4	56.8	-3.6	-6.0%	0.3	0.6%
Leichhardt Market Place	4.8	17,600	137.1	146.7	138.9	-7.8	-5.3%	1.8	1.3%
Earlwood	6.2	14,500	76.6	81.9	80.2	-1.7	-2.1%	3.6	4.7%
Other Localities						-9.0			
<b>TOTAL</b>		<b>174,950</b>	<b>1,078.2</b>	<b>1,153.5</b>	<b>1,162.5</b>	<b>0.0</b>	<b>0.8%</b>	<b>84.2</b>	<b>7.8%</b>

\* Sources various including Pitney Bowes, Hill PDA and PCA (excludes vacancies and non-retailers)

\*\* Source: Various including Shopping Centre News, Pitney Bowes Business Insight, Marrickville Metro Economic Impact Assessment and Hill PDA estimates

Table 5 indicates that the marginal retail turnover of \$90 will be captured from a range of centres. Approximately \$21m is captured from existing retailers in Marrickville, \$20m from retailers in Newtown and Enmore, \$23m from the Broadway Shopping Centre and so on. Clearly, given that a lesser marginal turnover would be generated by the revised scheme compared to that originally proposed, the impacts have reduced in comparison to those estimated previously.

As shown in the above table there are some differences in levels of impact between Hill PDA estimate and the Pitney Bowes estimated impact. This is due to differences in methodologies employed to measure impact. The method used by Hill PDA shows stronger impacts on centres closer to Marrickville Metro. The immediate impacts on Marrickville (Illawarra Road and Marrickville Road) are greater than a 14% loss in trade which is greater than the estimated 4% impact upon forecast by PB.



### 6.3 Are the Impacts Considered Significant?

There are no universal measures of significance. There are references in various consultancy reports and statements in the LEC which suggests that a loss of trade below 5% is considered insignificant, 5% to 10% is low to moderate, 10% to 15% is moderate to high and above 15% is a strong or significant impact.

Following the completion of the proposed development it is expected that the strip shopping centre along Marrickville Road and Illawarra Road will experience around a 14% decline in retail sales. Therefore this is considered to be a moderate to high impact.

The impact on Enmore is also considered moderate at 12% loss in trade and the impact on Newtown is a loss in sales of 8% which is considered to be in the low to moderate range, albeit on the higher side of the low to moderate range.

### 6.4 Can the Centres Absorb these Impacts?

The next step is to consider the ability of these centres to absorb these losses. A centre may experience a significant impact – say 20% loss in retail sales – but if that centre is currently over trading by say 30% then it can sustain the loss. Alternatively if the centre is in a high growth area then the adverse impact may be short term rather than long term. We tested these possibilities in the case of Marrickville centres.

According to the PB report, Marrickville Road and Illawarra Road precinct achieved a turnover of \$140m in 2009. This was around 20% below national average<sup>3</sup>. Given that:

- the estimated impact on these strips is forecast to result in a 14% loss in trade;
- Marrickville's trade area is growing at a very mundane rate of 0.7% per annum; and
- the centre is currently performing 20% below national average; then

it is not expected that this centre will be able to absorb such a fall in turnover of this level and remain viable. The implications of an impact of this level are likely to manifest themselves in the Marrickville Road and Illawarra Road precinct in the form of considerable and longer term vacancies. At the time of the Hill PDA land use audit in August 2010, Marrickville Road had 10 vacant premises (8.5% of all shop front premises excluding those being used for commercial purposes or 6% including commercial premises) and Illawarra Road had 17 vacancies (21% of retail premises or 11% of total shop front premises). The high proportion of commercial premises is a further indication that these strip centres are performing well below average.

The impact of a 14% decline in trade coupled with a high combined vacancy rate of 8.4% is likely to result in the vacancy rate over Marrickville Road and Illawarra Road combined increase to around 14% to 15%. This equates to one vacancy out of every six to seven shop front premises. Although the quantum of retail floorspace proposed in the revised scheme is 22% lower than that proposed originally, it is likely that the impact upon vacancies on the Marrickville Road and Illawarra Road precinct will be similar to the previous scheme. This is attributable to the overall attraction and draw of the expanded Marrickville Metro centre remaining largely undiminished as a result of

<sup>3</sup> ABS Retail Survey 1998-99 indexed to \$2009 at CPI



the expansion despite the lesser provision of floorspace- it will still be providing a new full line supermarket, a further discount department store and a high number of specialities. With a population growth of only 0.7% per annum it will take until 2022 before the retail strip centre returns to its 2009 trading levels in real terms.

Enmore will experience a moderate trade impact of 12% whilst Newtown will experience a low to moderate impact upon trade of 8%. Enmore is trading around 20% below national average and Newtown is trading around 7% below. The difficulty in measuring Newtown's performance is that it is unequally distributed over a long distance of more than 1.5km along King Street. Generally the shops near the railway station are trading well but the fringe areas – particularly the southern end is quite blighted with much higher vacancies. Overall Newtown had a vacancy rate of around 7% at the time of the Hill PDA land use survey which is considered moderate if not high. We do however, expect to see vacancies rise to around 10% across the whole centre and probably higher than 15% in the southern end, which is the end closest to Marrickville Metro. It is suggested in the PB report that King Street, Newtown provides a high level of independent apparel operators. Generally these retailers are more susceptible to changes in turnover than national retailers.

The impacts on Petersham are less significant at 5.5% loss in trade which equates to a low to moderate impact. However Petersham is strongly underperforming at around 35% below national average. It had 13 vacant shops at the time of the Hill PDA land use survey which represented 16% of total shop front premises. Non-retailers occupied a further 34% of space. In other words only half of total shop front space is occupied by retailers reflecting its poor performance.

We note that, as identified earlier in this Study, the PTA is not an area which is forecast to experience a high level of population growth in over the next 10 years. In terms of the housing stock in this area, we note that this was predominantly established in the early to mid 20<sup>th</sup> century and therefore represents a mature residential area within which there is likely to be limited potential to intensify residential uses. On this basis, the proposed retail floorspace would increase competition for a limited growth pool of spending dollars.

## 6.5 Will the Impacts Result in Social Detriment?

The proposed development is expected to result in significant impacts upon strip retail shops located in and around the Marrickville Local Government Area. Traditionally this area has featured a high number of well performing strip precincts, which have predominately been developed nearby to major transport infrastructure, namely train stations. In the present day these strip centres continue to offer a high level of amenity and convenience to the community, affording residents a greater level of choice of retailers without the need to own or use a car. If the proposed development proceeds, it is estimated that half of the marginal turnover (\$45m) will be captured from existing strip retailers in Marrickville, Newtown, Enmore, Petersham, Dulwich Hill and Hurlstone Park.

The proposal is likely to have a strong negative impact on existing strip retailers, placing these facilities in financial jeopardy. The proposed development will likely capture an estimated \$45m from existing strip retailers within, and on the boundary of, Marrickville LGA, equating to a combined loss in turnover of 10% for these retailers. Given the smaller size and relatively lower margins of strip based retailers such a fall in turnover is likely to make a number of these retailers unviable. This is likely to translate to increased vacancies in these centres from the current average of 7% to around 12% to 14%. More specifically it is expected that the Enmore, Newtown and Marrickville strip precincts will be most impacted by the proposed expansion. As previously indicated, whilst



the level of floorspace proposed in the revised scheme is lower than that proposed in the original scheme, the overall retail offer of the expanded Marrickville Metro will remain largely unchanged.

It is stated in the PB report that the identified retail strip precincts play a different role to the existing and proposed Marrickville Metro, with the strip precincts providing residents with "convenient, independent food and retail service facilities, often with particular ethnic specialisations"<sup>4</sup>. Although we do not dispute the above statement, many of the retailers while remaining independent, offer the same or similar products that national retailers offer. It is unrealistic to assume that these national retailers would not be in direct competition with local independent retailers.

The impacts suggested in the PB report is at odds with historic reality. When Marrickville Metro opened in the 1980s the strip retailers experienced considerable impact. A number of businesses closed, rents dropped considerably to attract new tenants and vacancies were quite slow to fill. Whilst these strip centres have experienced improved trading performance over the past couple of decades history suggests that they will experience another impact and these impacts are likely to be felt for some time given that there is very minor growth in the locality. History is full of cases where large indoor centres have resulted in social detriment to existing centres and main street retail. Case studies, just to name a few, include:

- Maroubra Junction (impact from Eastgardens)
- Port Kembla (impact from Warrawong)
- Wyong (impact from Tuggerah)
- Newcastle CBD (impacts from Kotara and Charlestown)
- Cessnock main street (impacts from the indoor centres)

The proposed development struggles to meet the (*Fabcot*)<sup>4</sup> test. Whilst it will provide some benefit in the locality, particularly with an additional department store, it will also result in adverse economic impact on the surrounding retail strip precincts and the resultant community detriment will not be made good by the development itself.

## 6.6 Impact on Employment

The PB report suggests that employment within the region will increase by a net amount of 625 full time jobs, comprised of an additional 658 jobs provided by the expanded Marrickville Metro and a fall of 5% (of the total increase of jobs) in employment of other retailers within the area. What is not explained in the PB report, is how the figure of 5% fall in jobs is derived and why this figure has been only been applied to the increase in total jobs attributable to the increased centre, rather than total number of retail jobs within the region.

Applying the estimated employment multipliers as indicated in Table 5.8 of the PB report, to the total competing floor space indicated in Table 3 of this report, it can be estimated that the total number of retail jobs in competing centres is 9,923. If the figure of 5% is then applied to the total number of jobs in competing centres, it can be estimated that the loss of jobs as a result of the Marrickville expansion is closer to 496 full time jobs.

<sup>4</sup> PB Business Insight, Marrickville Metro, Sydney Economic Impact Assessment (November 2010)



The important consideration is that building more retail space does not result in more retail expenditure. Retailers and retail centres are chasing the same dollars. Hence the overall increase in net employment levels is not significant. The proposal is likely to shift some jobs away from the strip retail centres to Marrickville Metro – in other words away from train stations to a stand alone retail outlet that is not served by the train line. This is contrary to sound planning principles which is about encouraging the use of public transport in commuting to work.

## 6.7 Pitney Bowes Comments on the Previous Hill PDA Report

PB responds specifically to the comments made by Hill PDA regarding the methodology and conclusions in relation to the previous development application. We make the following comments in response.

Regardless of the reasons why the strip retailers are trading at below 20%, which PB allude to be correct, the implication is that the impact upon these centres as a result of the proposed development will therefore be much greater. This is the purpose of the “Fabcot” test. A centre which is trading at 20% below average is less likely to be able to absorb further reductions in trade without some social detriment;

PB is critical of Hill PDA for not differentiating between demand for strip retail facilities and shopping centre facilities. However, the designation of the type of floorspace is not important but rather it is the nature of the goods provided that matters. The great majority of goods sold in the indoor centres are the same as goods sold in the main street centres – whether it be food and groceries, sit down meals and take-away foods, clothing, pharmaceuticals, stationery and newspapers/magazines, hair and beauty services, etc. The different formats of centres do not affect the product sold or types of retail stores. Therefore when assessing demand and competition it should be considered on the basis of retail store type or retail merchandise being sold. It should not be assessed on the design format of the shopping centre.

The gravity model used by Hill PDA has evolved over time and has been used in numerous retail and impact studies and represents a robust method of assessing impact. It has been tested through close interrogation on multiple occasions. We also note that other consultants have used gravity models, or similar, to assess impact, and on this basis it is a reliable means upon which to assess impacts.

PB questions the assumption that distance is not an important consideration when modelling impact. We strongly disagree with this assertion. Shoppers may, on rare occasion, choose to travel further to a shopping centre but in most cases shoppers have a strong preference to minimise travel distance, time and costs when shopping, particularly for goods such as food and groceries for which there is little product differentiation between different centres. Clearly, the impact of the Marrickville Metro expansion is therefore strongest on centres located in close proximity, as it will draw more shoppers in the immediate locality.

PB appears to infer that it is not logical to compare the provision of an enclosed, managed shopping centre such as Marrickville Metro to the more mixed and sporadic provision of a retail strip centre in terms of impact, i.e. both centres already perform different roles and therefore a change in one will not impact the other. On the contrary, if an enclosed shopping centre expands further more residents are likely to redirect more shopping trips to it at the expense of main street centres. These centres are not mutually exclusive. They are chasing the same dollars.

On this note it is also important to reiterate our comments, repeated above, that building more retail floorspace does not result in more retail expenditure. Thus, the addition of retail floorspace at Marrickville Metro will not in itself create additional demand. The level of demand will remain the same. However it is the way that demand is

distributed between existing centres that will be affected. The \$90m increase in turnover forecast by PB will be redirected for centres that would otherwise have received a share of this overall quantum of expenditure.

For the above reasons, our approach to assessing impact and our subsequent conclusions are considered reasonable and robust.



## DISCLAIMER

This report is for the confidential use only of the party to whom it is addressed (the client) for the specific purposes to which it refers. We disclaim any responsibility to any third party acting upon or using the whole or part of its contents or reference thereto that may be published in any document, statement or circular or in any communication with third parties without prior written approval of the form and content in which it will appear.

This report and its attached appendices are based on estimates, assumptions and information sourced and referenced by Hill PDA. We present these estimates and assumptions as a basis for the reader's interpretation and analysis. With respect to forecasts we do not present them as results that will actually be achieved. We rely upon the interpretation of the reader to judge for themselves the likelihood of whether these projections can be achieved or not.

As is customary, in a report of this nature, while all possible care has been taken by the authors to prepare the attached financial models from the best information available at the time of writing, no responsibility can be undertaken for errors or inaccuracies that may have occurred both with the programming or the financial projections and their assumptions.

**REVIEW OF  
PREFERRED PROJECT REPORT ON  
TRANSPORT ASPECTS  
FOR  
PROPOSED REDEVELOPMENT OF  
MARRICKVILLE METRO  
SHOPPING CENTRE  
AT  
34 VICTORIA ROAD MARRICKVILLE**

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## APPENDICES

### Appendix 1 Extracts from Halcrow's Preferred Project Report on Transport Aspects (November 2010)

Principal Arrival / Departure Distribution (Figure 2)

Traffic Modelling Summary

Proposed Bus Movements (Figure 9)

Proposed Pedestrian Route Improvements (Figure 10)

Proposed Bicycle Improvements (Figure 11)

General Arrangement Plan

Proposed Parking Controls – Smidmore Street (Figure 7)

Plans of the Proposal

## 1.0 INTRODUCTION

Transport and Urban Planning has been appointed by Marrickville Council to undertake a review of the Preferred Project Report on Transport Aspects for the Proposed Redevelopment of Marrickville Metro. The report (dated November 2010) has been prepared by Halcrow.

Transport and Urban Planning also undertook a review of the TMAP report dated July 2010 for the original expansion proposal for Marrickville Metro, on behalf of Marrickville Council.

The Preferred Project includes a number of amendments from the original proposal which include:

- A reduction in the size of the development with the increase in the Gross Leasable Floor Area (GFA) now proposed at 16,767m<sup>2</sup> GFA;
- A reduction in the number of additional car parking spaces to 528 additional spaces;
- The retention of Smidmore Street as a through vehicle route (i.e. open to vehicle traffic), together with a proposed public domain 'concept vision' for Smidmore Street which will be subject to further agreement of Marrickville Council;
- Changes to the proposed vehicle ramps to and from the car park; and
- Other changes which are documented below.

## 2.0 THE PREFERRED PROJECT

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 Preferred Project to redevelop Marrickville Metro Shopping Centre includes:

- Redevelopment of the existing industrial site (13 – 55 Edinburgh Road) to create a two level retail addition to the shopping centre
- Increase in the retail floor area from 22,933m<sup>2</sup> GFA to 39,700m<sup>2</sup> GFA (approximately 73% increase)
- Increase the off street parking from 1108 spaces to 1628 car spaces. Vehicle access points are proposed in Murray Street, at its existing location, in Smidmore Street east of Edinburgh Road at its existing location and in Edinburgh Road, east of Smidmore Street (left in / left out). There will be no connection between the Edinburgh Road car park (13-55 Edinburgh Road) and the main car park. It is also



now proposed to restrict the entry movements to left turn only (ie. no right turn) at the Smidmore Street entry/exit. There will be no change to the exit movements at this location.

The Preferred Project includes the following transport changes / improvements.

- The retention of the bus terminal (shelter etc) for 3 buses in Edinburgh Road as a replacement to the existing facilities in Smidmore Street, although the proposed bus servicing has changed;
- A new raised pedestrian crossing in Smidmore Street between the entrances of the shopping centre; and
- Retention of other pedestrian improvements, additional bicycle linkages, dedicated car share spaces within the car park and a Green Travel Plan.

The proposed road improvements for the Preferred Project include:

- Minor changes to the proposed parking restrictions at the Edgeware Road / Llewellyn Street / Alice Street intersection previously proposed;
- Changes to the proposed improvements at Bedwin Road / May Street / Campbell Road / Unwins Bridge Road intersection including a reduction in the number of car parking spaces proposed to be removed; and
- Changes to the proposed roundabout at the intersection of Sydney Steel Road / Edinburgh Road as well as maintaining the existing roundabout with no changes at Murray Street / Edinburgh Road.

### 3.0 ASSESSMENT OF TRANSPORT ISSUES

#### 3.1 Objectives and Mode Split Targets

There is no stated change for the previously set targets for mode of travel for staff and customers travelling to and from Marrickville Metro.

#### 3.2 Traffic Generation

The previous methodology for calculating the traffic generation was considered appropriate and Halcrow have retained this methodology for the Preferred Project. With the Preferred Project the change in the generation of Marrickville Metro is calculated as follows:

- Thursday evening – increase from 1041 veh/hr to 1406 veh/hr (i.e. increase of 365 veh/hr)
- Saturday – increase from 1597 veh/hr to 2252 veh/hr (i.e. increase of 655 veh/hr)

#### 3.3 Traffic Assignment

Halcrow has reworked the traffic assignment from the original report due to changes to the original proposal and provided some additional information on how the traffic assignment was derived.

The Preferred Project:

- Retains an entry / exit to the car park from Smidmore Street, although the entry movement is restricted to left turn in (ie. no right turn from Smidmore Street); and
- Separates the proposed car park for 13-55 Edinburgh Road from the main car park. There are no internal linkages between the 2 car parks. The Edinburgh Road car park will have approximately 433 car spaces and will be a stand alone car park.

However Halcrow has maintained a traffic assignment that shows only very minor increases for traffic arriving and departing Marrickville Metro using Edgeware Road north of Victoria Road and Alice Street. The Halcrow assignment (based on their **Figure 2**) has in total some 14% of arrival traffic and 8% of departure traffic using these 2 routes, which underestimates the likely use of both these streets.

The Halcrow assignment is not readily explained by the current arrival and departure patterns, the existing traffic management on the road network, a comparison of trip lengths for the routes, the proposed vehicle access locations, the proposed drawing area as defined by Puttney and Bowers and or a reduction in the traffic generation associated with linked trips.



In this regard:

- The current proportion of traffic arriving and departing from the north / east via Edgware Road / Victoria Road / Murray Street is significantly higher than the projected future proportion. It would be expected that the future proportion would remain at similar levels.
- Alice Street / King Street route is quicker and a much shorter route for vehicles with an origin and destination east of Newtown Bridge in lieu of Enmore Road / Victoria Road / Edinburgh Road. Also Edgware Road (south of Stanmore Road) is shorter than the Enmore Road / Victoria Road / Edinburgh Road route for arrival trips to the shopping centre generated east of Stanmore Road.
- The orientation of the car park's entry / exits do not change this, as it will be shorter and quicker to go around the block near the development rather than take the longer route, for the above scenarios.
- The discount for the linked trips has been applied at a higher level in Edgware Road than for the Enmore Road / Victoria Road route. This is contrary to and inconsistent with the projected traffic assignment.

Transport and Urban Planning still considers that Halcrow have under estimated the increase in the number of trips that will use Edgware Road north of Victoria Road and Alice Street / King Street and over estimated the use of Enmore Road / Edinburgh Road west of Smidmore Street. This will lead to increased impacts at the Edgware Road / Alice Street / Llewellyn Street intersection.

Transport and Urban Planning also still considers that there will be some increased use of Lord Street by vehicles travelling between Marrickville Metro Shopping Centre and King Street as Lord Street provides a more direct link to parts of the Erskineville residential area and is a faster route from Mitchell Road, than May Street / Bedwin Street. Halcrow does not show any increases in Lord Street, due to the Preferred Project, although does suggest any increases could be addressed by additional traffic calming measures. Council does have a proposal to provide additional speed humps in Lord Street, so a contribution towards these measures might be appropriate if the development proceeds.

### 3.4 Traffic Impacts

Under the Preferred Project Smidmore Street is to remain open to all traffic while access to the car park is to be provided from Smidmore Street, the right turn entry movement is proposed to be prohibited to minimise the potential for these vehicles to queue across the raised pedestrian crossing which is to be provided in Smidmore Street.

Halcrow have not provided any projected pedestrian figures on the use of this crossing. However it is likely to be well used based on



- The crossing is the direct link between the two (2) sites that make up the retail development; and
- The relocation of the bus interchange to Edinburgh Road (from Smidmore Street) will result in the majority, if not all, bus passengers visiting the shopping centre having to use the pedestrian crossing when arriving and departing.

The proposed prohibition of the right turn will be difficult to enforce unless a physical barrier is provided and likely to be counterproductive if it increases drive around the block trips and or U turns in Smidmore Street by vehicles wishing to enter the car park.

Sufficient queuing for 2 vehicles is available between the vehicle entry and the pedestrian crossing although queuing would reduce driver sight lines for eastbound vehicles of pedestrians crossing south to north.

The proposed arrangements are not particularly satisfactory and given the likely volume of pedestrians, an alternative form of control and or design changes may need to be considered, as the left turn traffic into Smidmore Street from the vehicle ramp will also be affected and delayed by pedestrians using this crossing, resulting in delays for all vehicles using this vehicle exit.

The lack of an internal link between the two (2) car parks will result in the street system being used at busy times by some shoppers for trips between the two car parks to find a parking space. Halcrow have not acknowledged this issue in the report, or suggested any strategies or management practices to limit the incidence of this occurring.

#### Traffic Volume Increases

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

- 365 veh/hr in the Thursday evening period; and
- 655 veh/hr in the Saturday midday period.

This represents a 35%-41% increase over the existing situation, but the increase is less than for the original proposal.

These increases will be split over a number of roads which spreads the impacts. The largest impacts will be experienced on those roads adjacent the car park entrances.

Halcrow have included information and a breakdown of the expected traffic increases from other approved development, as well as the assignment of the traffic associated with Marrickville Metro (Figures in Appendix B). Table 2.1 of the Halcrow report which is enclosed compares the existing and future two way traffic volumes on sections of the road network. There appears to be some inconsistencies with the traffic volumes for several roads when compared to **Figures 3 and 4** and the figures in **Appendix B**. The table shows the largest increases occur in Edinburgh Road, Victoria Road west of Edinburgh Road, Smidmore Street, Murray Street near Smidmore



Street, Enmore Road, Bedwin Street and May Street. It is not clear if these inconsistencies have been carried through to the traffic modelling.

Halcrow's projected increase in Alice Street is from other approved development not from the proposal. As previously noted Halcrow show very small traffic volume increases shown for Alice Street and Edgeware Road, north of Victoria Road that is attributable to Marrickville Metro development. Transport and Urban Planning disagrees with Halcrow's traffic assignment.

### 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. The modelling has taken into account traffic from the approved developments including 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 well as future traffic from Marrickville Metro. No other regional future traffic growth has been factored into the modelling.

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. RTA Guide to Traffic Generating Development accepts Level of Service D as the minimum standard.

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 D operation in the Thursday evening and Saturday midday periods with average vehicle delays of 46.2 seconds and 55.1 seconds respectively. (NB. Average Vehicle Delay for minor movements)
- Edgeware Road / Victoria Road –  
Level of Service D operation in the Thursday evening and Saturday midday periods with average vehicle delays of 42.6 seconds and 44.3 seconds respectively<sup>1</sup>
- Enmore Road / Smidmore Street -  
Level of Service D operation in the Saturday midday period with average vehicle delays of 52.3 seconds.

The increases in Average Vehicle Delay due to the proposal at the modelled intersections ranges between 1 – 11 seconds in the Thursday PM period and between 1 – 23 seconds in the Saturday midday period.

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



As noted above Transport and Urban Planning considers higher levels of traffic will access the development via the Edgeware Road / Alice Street / Llewellyn Street intersection than predicted by Halcrow. A traffic assignment that provides higher traffic volumes using the Edgeware Road / Alice and Llewellyn Street intersection and the Edgeware Road / Victoria Road intersection would increase the vehicle delays at both these intersections and reduce the future level of service.

### 3.5 Proposed Road Improvement Works

The proposed road improvement works have been modified from the original proposal and now include:

- i) A new roundabout at Edinburgh Road and Sydney Steel Road which has been modified from the original proposal;
- 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 Edgeware Road for southbound traffic to 50 metres during weekday PM periods and on Saturday mornings at the Edgeware Road / Alice Street / Llewellyn Street intersection. Extend existing PM No Parking Restrictions in Alice Street by ½ hour to 6.00pm Monday to Friday. This affects 8 spaces;
- 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 3 spaces on the northern side of Unwins Bridge Road and 3 spaces on the northern side of May Street during the weekday PM peak period and on Saturday morning;

The proposed linemarking and phasing changes to the Unwins Bridge Road / May Street / Campbell Street intersection will require RTA approval.

### 3.6 Proposed Transport Changes / Improvements

The proposed transport improvements have been amended for the Preferred Project.

The improvements include:

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



### Buses

The amended bus scheme retains a new bus terminus for 3 buses in Edinburgh Road. **Figure 9** from the Halcrow report shows the proposed changes in bus routes, with Smidmore Street open. The route changes involve round the block movements involving Smidmore Street, Edinburgh Road and Murray Street. The 352 bus route change also involves using the bottom section of Edgeware Road and underpass of Bedwin Road to reach Edinburgh Road.

Halcrow have provided bus turning paths and some analysis to demonstrate that the proposed new interchange is sufficient to the task.

The main issue with the proposed interchange is its location in Edinburgh Road at the southern end of the development. The majority of shoppers using buses would need to cross Smidmore Street when travelling to and from the bus stops. Given that Smidmore Street will remain open, the proposed location in Edinburgh Road will be less convenient than the existing arrangements.

**Figure 7** of the Halcrow report shows a bus stop for one (1) bus on the southern side of Smidmore Street east of Edinburgh Road. It is not clear which buses if any will use this stop as no details are provided in the report. If all buses will pick up and drop off at this bus stop then a capacity of 1 bus length may not be sufficient. Further clarification is required.

The proposed changes to the bus servicing would require agreement of NSW Transport and Sydney Buses.

### Taxis

Based on **Figure 7** of the Halcrow report the location of the taxi zone is now proposed on the southern side of Smidmore Street, west of Murray Street. Limited details are provided in the body of report about this location, or if shelter is proposed. Based on Table 2.3 in the Halcrow report the taxi zone could accommodate 6 taxis.

## **3.6.2 Pedestrian Improvements**

Halcrow have still not provided any pedestrian crossing volumes on the road system adjacent Marrickville Metro. This makes it difficult to determine if the current facilities are adequate and more importantly with the additional 270 pedestrian trips per hour that are predicted by Halcrow, if existing facilities should be upgraded or additional facilities provided. Based on Table 6.6 in the TMAP report there are currently 495 walk trips per hour to Marrickville Metro and there will be 270 additional walk trips but there are no details on where these pedestrians cross the roads.

Halcrow have stated that no further assessment is required as the 270 additional walk trips would be spread over 8 walking routes, with an average of 35 pedestrians per route. However this ignores the existing 495 walk trips. When these are added to the

additional trips, pedestrian numbers are in the order of 95-100 pedestrians per route per hour (based on their methodology). Halcrow's response is therefore considered inadequate and further information should be provided.

Halcrow's **Figure 10** shows the proposed pedestrian improvements. This includes

- New footpaths on the site frontages;
- Accessible entries / exits, new kerb ramps at immediate crossings;
- A new pedestrian crossing across Edinburgh Road, east of Sydney Steel Road which Halcrow indicate elsewhere in the report, will only be pedestrian refuge island as part of the roundabout;
- A new pedestrian refuge in Edgeware Road south east of Smidmore Street;
- Improve lighting along the Sydney Steel Road footpath; and
- Investigate improvements to the squeeze point on the path at Juliet Street and Victoria Road.

Halcrow's **Figure 10** also shows improved pedestrian routes to St Peters and Sydenham Station, although no details are provided if this is included as part of the Preferred Project and what it entails by way of improvements.

Other pedestrian facilities proposed and shown on the General Arrangement Plan (210026-SK-000-B) include:

- The proposed new raised pedestrian crossing across Smidmore Street; and
- Kerb blisters on the existing pedestrian crossing in Murray Street, north of Edinburgh Road.

Transport and Urban Planning considers that for consistency and improved potential pedestrian safety, the Murray Street pedestrian crossing should also be raised, with kerb blisters

### 3.6.3 Cycle Facilities

#### Bicycle Parking

Halcrow have provided additional information on how the bicycle parking provision for 80 bicycles was calculated. It is based on travel survey interviews undertaken on people entering the shopping centre at the Victoria Road and Smidmore Street entrances on:

- Thursday 22 April 2010 between 3.30pm and 6.30pm; and
- Saturday 24 April 2010 between 10.30am and 1.30pm.



Halcrow indicate that the survey included employees and shoppers. However it is likely that it has underestimated bicycle use by employees, given the times it was undertaken and the fact that it only interviewed people entering the centre at these times.

As previously noted the proposed provision of 80 bicycle parking spaces is less than Council's required bicycle rate for parking for retail uses which is 212 bicycles and is based on:

- 1 bicycle space / 500m<sup>2</sup> for customers
- 1 bicycle space / 300m<sup>2</sup> for employees

The Council rate for employees alone would require 79 bicycle spaces, without consideration of customer needs.

Transport and Urban Planning has previously acknowledged that some reduction in bicycle parking provision may be warranted along the lines of RTA parking rates which would be a discount of 33%. This would provide a requirement of 142 bicycle parking spaces in total with this discount applied to Council's Code. Halcrow's target of 2% bicycle use for staff would require 13 spaces for staff based on an estimated 625 employees. An initial target of 5% for staff may be more appropriate and would require 32 bicycle spaces. Customers parking based on 2% mode split would require an additional 95 spaces, (from Table 6.6 of the TMAP report) giving a total of 127 bicycle spaces.

While this provision may be higher than what is required initially, it would demonstrate a commitment to cycling.

The other main issue with Halcrow's suggested approach to the bicycle parking provision is that there is no mechanism that ensures bicycle parking would be increased over time. A condition of consent would have to specify required dates for the increases in bicycle parking provision to what is considered to be the optimum final figure. To encourage cycling this should occur regardless of demand at the time.

#### Proposed Bicycle Improvements

The proposed bicycle improvements are shown on **Figure 11** of the Halcrow report and include:

1. Customer bicycle rails, staff bicycle parking enclosure;
2. Marked bicycle symbols on street in Lord and Darley Streets;
3. Marked bicycle symbols on street in Edgeware Road under Bedwin Road;
4. Marked bicycle symbols on street in Edinburgh Road;
5. Marked bicycle symbols on street in Sydney Steel Road;
6. Lighting and signs for off street shared bicycle pedestrian path between Sydney Steel Road and Shirlow Street;

7. Use of Saywell and Cadogan Streets (in lieu of contra flow lane in Shirlow Street) and then Sydenham Road, as well as marked bicycle symbols on street in Shirlow Street (northbound);
8. Bicycle marking and signs for a two way shared bicycle-pedestrian footpath in Sydenham Road and Railway Parade; and
9. Marked bicycle symbols in Victoria Road to L7 and Juliet Street.

The proposed regional Route 5 to Camperdown has also been added to **Figure 11**.

Transport and Urban Planning recommends that all bicycle parking provisions for the shopping centre be provided within the development and not on the footpaths of the public roads adjacent the development.

### **3.7 Parking Provision**

A total of 1628 car parking spaces are proposed as part of the Preferred Project. This provision is consistent with RTA's parking provision for a retail development of this size (39,700m<sup>2</sup> GFA) which is 4.1 spaces / 100m<sup>2</sup>GLA, and would require a total of 1628 car spaces.

The parking provision is less than what is required under Council's Parking Code. Notwithstanding this, Transport and Urban Planning concludes that the parking provision of 1628 car spaces is consistent with RTA Guidelines and that the RTA Guidelines are the appropriate guidelines to adopt, with regard to parking provision.

The original development application proposed parking for 36 motor bikes and it is unclear if this has been retained for the Preferred Project and requires clarification.

### **3.8 Loading**

The Preferred Project incorporates loading facilities in three (3) separate loading areas which are accessed off Smidmore Street (existing dock) and Murray Street, north of Smidmore Street and Murray Street, north of Edinburgh Road.

Swept path diagrams have been provided for the two loading docks in Murray Street which shows a 19 metre semi trailer can enter and exit these docks in a forward direction. No swept analysis is provided for the existing loading dock in Smidmore Street.

### **3.9 Heavy Vehicle Access**

Appendix F of the Halcrow report shows that swept path analysis of heavy vehicles using the immediate intersections adjacent the shopping centre. Plan 210026-SK-000B prepared by Cardo, shows the required changes and proposed road / intersection improvements, which includes:

- Kerb and (some) boundary adjustments at:



- Murray Street / Edinburgh Road
- Murray Street / Smidmore Street
- Smidmore Street / Edinburgh Road as well as changes to the traffic signals
- Proposed roundabout at Edinburgh Road / Sydney Steel Road
- In Edinburgh Street and Murray Street associated with car park access, bus interchange and proposed channelisation for the roundabout at Sydney Steel Road.

This plan also shows the:

- Proposed kerb blisters for the existing pedestrian crossing in Murray Street, north of Smidmore Street; and
- Proposed kerb blisters and raised pedestrian crossing in Smidmore Street.

### 3.10 On Street Parking

Halcrow have provided details on the loss of parking in Smidmore Street (both sides) and in Murray Street and Edinburgh Road on the sides with street frontage to proposed development. Overall there would be a loss of 20 spaces of which about 8 spaces are due to increased space for buses and taxis.

Halcrow's **Figure 7** shows Halcrow's recommended parking controls in Smidmore Street adjacent the proposed development. This shows an extended area of no parking on the northern side of Smidmore Street for drop off movements. While parking changes are a matter for Council to adopt, the following changes are suggested.

- No parking areas for drop off / pick up movements should be provided on both sides (not one) given the nature of the development; and
- No parking restrictions are not appropriate across the pedestrian crossing, the car park vehicle driveway and the loading area driveway. These locations should be no stopping as no parking allows vehicles to legally stop for up to 3 minutes for the set down and pick up of passengers.

#### Other Streets

Transport and Urban Planning considers that the parking provision for the Preferred Project for 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 as previously raised by Transport and Urban Planning, 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 Transport Impacts of the Preferred Project has found the following:

- (i) The Preferred Project with a reduction in the amount of additional floor space will have lower traffic generation and parking requirement as compared to the original scheme.
- (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 1406 veh/hr on a Thursday evening and 2252 veh/hr on a Saturday midday period. This will be an increase of 365 veh/hr on Thursday evening and 655 veh/hr on Saturday midday.
- (iii) The Preferred Project retains Smidmore Street as a public street available for use by all traffic. As a result the shopping centre will be located on separate sites with no linkages between the car parks for the main shopping centre and the Edinburgh Road site. The pedestrian link between the shopping centre sites will be via a raised pedestrian crossing in Smidmore Street. Vehicle access to the car parks will be via Murray Street (all movements), Smidmore Street (all movements except No Right Turn for entry movements from Smidmore Street) and Edinburgh Road (left in / left out).
- (iv) The split site development will mean shoppers wanting to go to shops on both sites will be required to cross Smidmore Street, as will public transport users. The split site will also result in drivers searching for car parking spaces having to circulate around the block on the public road system to move between the car parks. This is considered to be a significant deficiency in the design resulting in higher levels of circulating traffic plus higher levels of pedestrian / vehicle conflicts in Smidmore Street.
- (v) The proposed No Right Turn for vehicles in Smidmore Street entering the car park will be difficult to enforce, based on the channelised plan for Smidmore Street provided by Halcrow.
- (vi) Halcrow have revised the recommended road and intersection improvements with changes and a reduction in the loss of parking in Alice Street and in May Street / Unwins Bridge Road. The proposed phasing and linemarking changes at the Unwins Bridge Road / May Street / Bedwin Road intersection will require approval of the RTA.
- (vii) Transport and Urban Planning has reviewed the additional information by Halcrow regarding the traffic assignment however still 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. 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. In addition there are still a number of inconsistencies with regard to the future predicted traffic volumes as shown in the various sections of the report. It is not clear if these inconsistencies have been carried through to the traffic modelling.

- (viii) Based on (vii) 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 D operation. The Smidmore Street / Edgeware Road intersection is also expected to have a Level of Service D operation.
- (ix) Halcrow have suggested that any increase in traffic in Lords Road could be addressed by additional traffic calming measures. It is noted that Council has a proposal to provide additional traffic calming in Lord Street and a condition of consent for a contribution towards these additional measures could be appropriate, if the development is approved.
- (x) Ultimately higher use of Edgeware Road and Alice Street due to the expanded shopping centre will require additional parking restrictions to be considered and implemented at Edgeware Road / Alice Street / Llewellyn Street intersection, if delays and intersection queuing become excessive. These additional parking restrictions, if implemented, will impact on properties in these streets.
- (xi) The Preferred Project retains the bus interchange in Edinburgh Road. Due to Smidmore Street remaining open to traffic, changes have been made to the original proposed bus routes. Buses would be no longer required to U turn at the Edinburgh Road / Sydney Steel Road roundabout. Although not mentioned in the body of the report, **Figure 7** also shows a bus stop on the southern side of Smidmore Street. It is not clear how this bus stop would work, or whether it is only a layover space, or an anomaly on **Figure 7**. Leaving this aside, one of the disadvantages with providing the new interchange in Edinburgh Road (now that Smidmore Street is to remain open) is that this location is less convenient for bus patrons who visit the shopping centre and will require most bus patrons to cross Smidmore Street.
- (xii) It is now proposed to relocate the taxi rank (capacity of 6 vehicles) to the southern side of Smidmore Street.
- (xiii) Halcrow are still proposing that 80 parking spaces for bicycles should be provided for the Preferred Development with future increases based on actions by the Proponent subject to increases in demand. The initial provision of 80 spaces is a large reduction on Council's requirement under its DCP which is calculated to be 212 bicycle parking spaces. Transport and Urban Planning considers that a higher level of bicycle parking should be provided initially, with the condition of consent specifying a time frame for the optimum maximum level to be achieved. The bicycle parking should be provided wholly within the site.



Halcrow's Bicycle Improvements recommended on the wider road network are shown on (Halcrow's) **Figure 11** and listed in Section 3.6.3 of this report.

- (xiv) The proposed parking provision of 1628 car parking spaces is consistent with RTA Guidelines. Further clarification is required if the motorbike parking previously proposed, is included in the Preferred Project.
- (xv) Three (3) separate loading bay areas are proposed. Swept path analysis has been provided for 2 of the loading areas but not the existing loading area off Smidmore Street.
- (xvi) The swept path analysis shows that kerb and (some) boundary adjustments will be required at the intersection of
  - Murray Street / Edinburgh Road
  - Murray Street / Smidmore Street
  - Smidmore Street / Edinburgh Road as well as changes to the traffic signals
  - Edinburgh Road / Sydney Steel Road associated with the roundabout and other works

The proposed changes to the Smidmore Street / Edinburgh Road traffic signals will require approval by the RTA.

- (xvii) Pedestrian facilities proposed include:

- Raised pedestrian crossing and kerb blisters for new crossing in Smidmore Street
- Kerb blisters at the existing pedestrian crossing in Murray Street north of Smidmore Street

For consistency and improved safety it is recommended that the improvement works include a raised crossing with kerb blisters at the Murray Street pedestrian crossing.

Other proposed improvements are shown on Halcrow's **Figure 10** and listed in Section 3.6.2 of this report. However Halcrow have not provided any pedestrian count data on the road network adjacent the shopping centre and this is a deficiency in their assessment and report.

- (xviii) Halcrow have calculated that there would be the loss of some 20 on street parking spaces in Murray Street, Smidmore Street and Edinburgh Road due to changes associated with the Preferred Project. Eight (8) of these lost spaces will be due to the transport changes.

Halcrow's **Figure 7** shows their recommended parking controls in Smidmore Street. Transport and Urban Planning recommends some changes to these parking controls which are outlined in Section 3.10 of this report. Also the need for and role of the bus stop shown on the southern side of Smidmore Street should be clarified.



- (xix) 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.
- (xx) In summary Transport and Urban Planning considers that the preferred project which recommends a split site development will result in:
- Higher levels of pedestrian vehicle conflict in Smidmore Street;
  - Increased around the block traffic movements associated with movements between the car parks;
  - Enforcement issues with respect to the proposed No Right Turn at the Smidmore Street car park entry;
  - A bus interchange location that is less convenient for the majority of shoppers, than the existing interchange.

With regard to the transport assessment Transport and Urban Planning considers that there are still issues / questions with regard to:

- The traffic assignment and the future traffic impacts particularly with Edgeware Road and Alice Street and the intersections of Edgeware Road / Alice Street / Llewellyn Street and Edgeware Road / Victoria Street;
- Proposed level of bicycle parking for the development;
- Inadequate information on pedestrian movements in and around the proposed development.

## **APPENDIX 1**

**Extracts from Halcrow's Preferred Project Report on Transport Aspects  
(November 2010)**

**Principal Arrival / Departure Distribution (Figure 2)**

**Traffic Modelling Summary**

**Proposed Bus Movements (Figure 9)**

**Proposed Pedestrian Route Improvements (Figure 10)**

**Proposed Bicycle Improvements (Figure 11)**

**General Arrangement Plan**

**Proposed Parking Controls – Smidmore Street (Figure 7)**

**Plans of the Proposal**



# PRINCIPAL ARRIVAL/DEPARTURE DISTRIBUTION

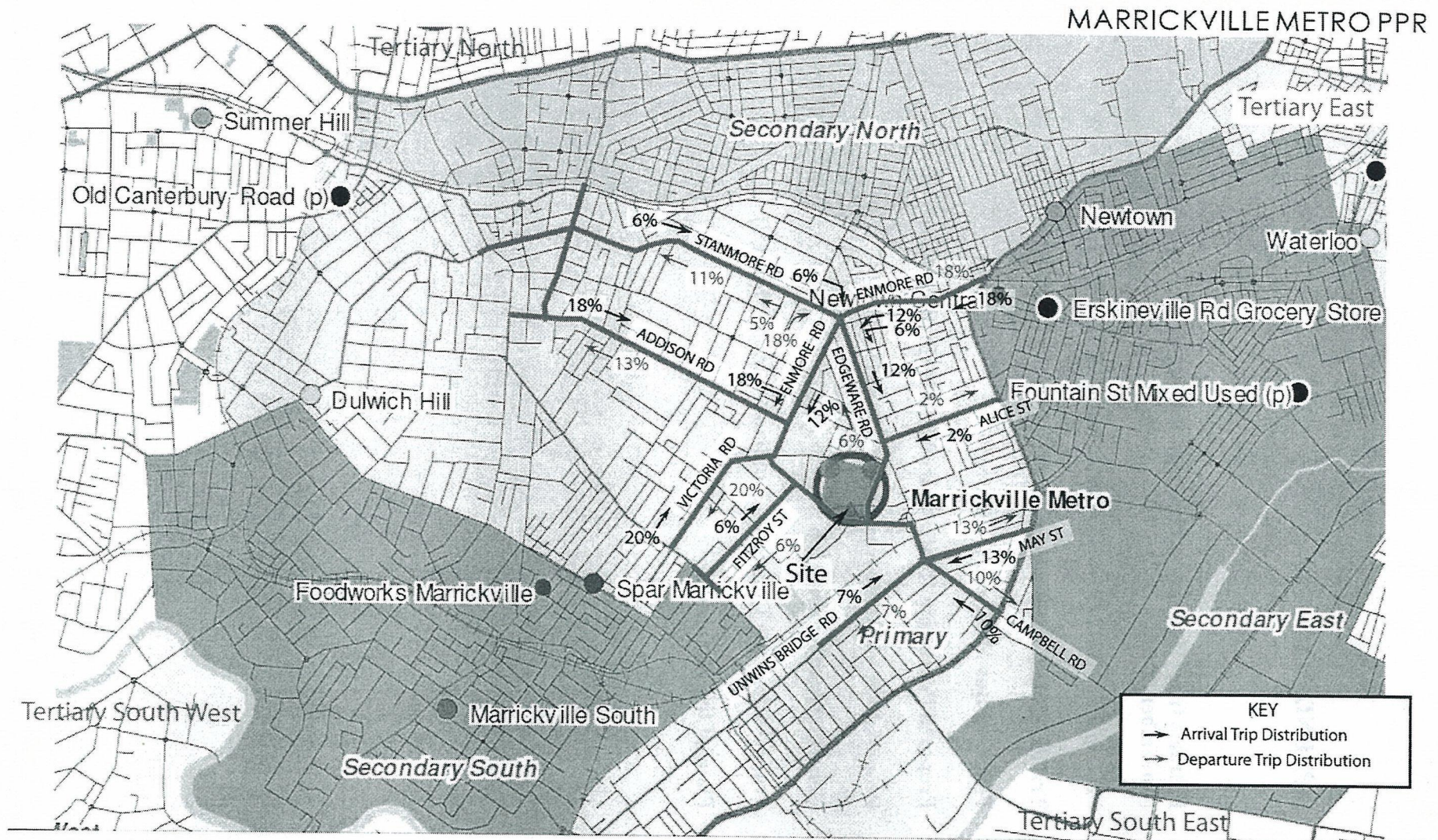


Figure 2



**Table 2.2 – 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	B	27.0	B	27.7
Addison Rd / Enmore Rd	Existing	Signals	B	25.1	B	22.6
	Future	Signals	C	29.7	C	29.2
Victoria Rd / Edinburgh Rd	Existing	Signals	B	28.1	B	27.2
	Future	Signals	C	30.7	B	28.2
Edgware Rd / Alice St / Llewellyn St	Existing	Signals	D	56.2	D	53.1
	Future	Signals	D	46.2	D	55.1
Edgware Rd / Victoria Rd	Existing	Signs	C	41.3	C	41.8
	Future	Signs	D	42.6	D	44.3
Edinburgh Rd / Fitzroy St	Existing	Roundabout	B	15.5	A	11.9
	Future	Roundabout	B	26.7	B	15.2
Fitzroy St / Sydenham Rd	Existing	Signs	A	11.5	A	12.0
	Future	Signs	A	12.0	A	12.3
Edinburgh Rd / Smidmore St	Existing	Signals	B	26.7	C	29.6
	Future	Signals	B	26.6	D	52.3
Smidmore St / Murray St	Existing	Roundabout	A	8.0	A	8.2
	Future	Roundabout	A	7.9	A	8.6
Edinburgh Rd / Sydney Steel Rd	Existing	Signs	A	11.6	A	9.4
	Future	Roundabout	A	11.6	A	10.2
Edinburgh Rd / Murray St	Existing	Roundabout	A	11.2	A	10.7
	Future	Roundabout	A	11.7	A	11.2
Edinburgh Rd / Railway Pde	Existing	Roundabout	A	9.8	A	9.6
	Future	Roundabout	A	10.6	A	9.1
Edinburgh Rd / Bedwin Rd	Existing	Signs	B	24.8	B	24.2
	Future	Signs	C	30.0	B	25.5
Bedwin Rd / Unwins Bridge Rd / Campbell Rd / May St	Existing	Signals	D	50.4	D	46.9
	Future	Signals	B	26.2	C	29.7

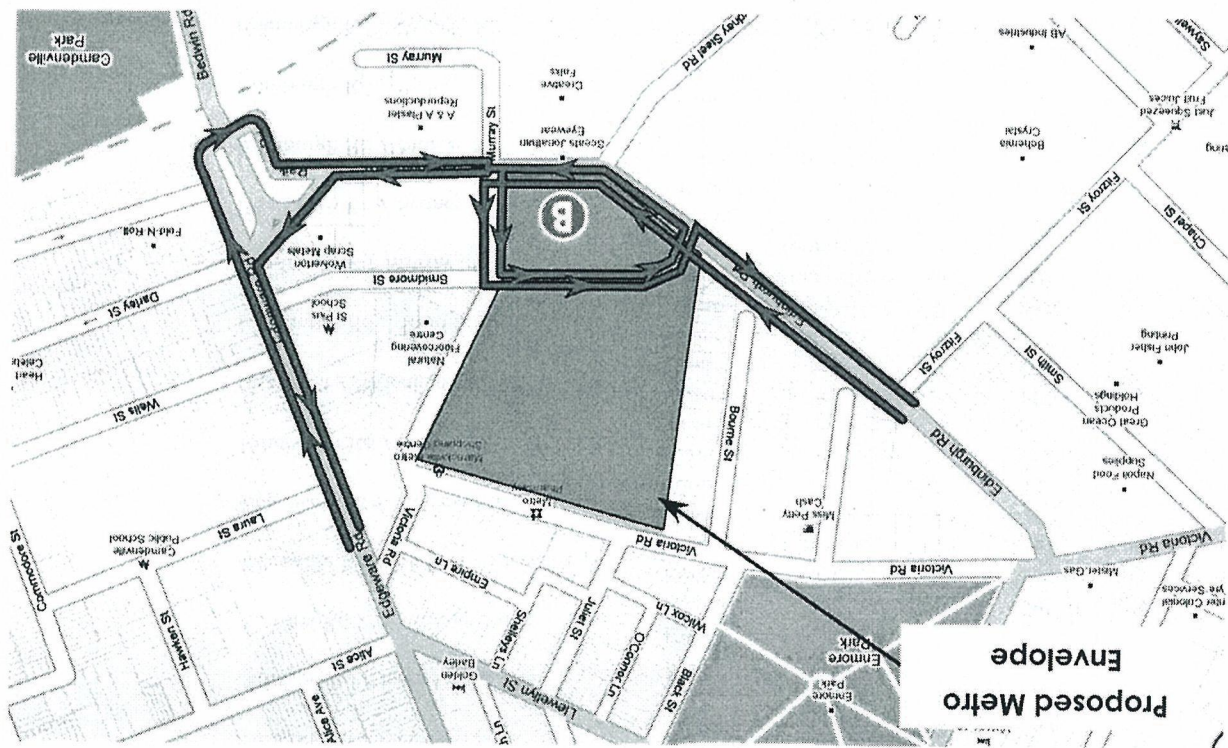
Table 2.2 indicates that subject to the proposed improvements as outlined above, all existing intersections would operate satisfactorily under the forecasted future traffic conditions of the amended Marrickville Metro scheme.

Furthermore, the proposed improvement scheme for the Bedwin Road intersection with May Street-Campbell Road-Unwins Bridge Road would not only offset the impact of the proposed development, but the analysis indicates that the improvements would improve the performance of the intersection above its current performance levels.



# PROPOSED BUS MOVEMENTS

MARRICKVILLE METRO TMAP



## Key

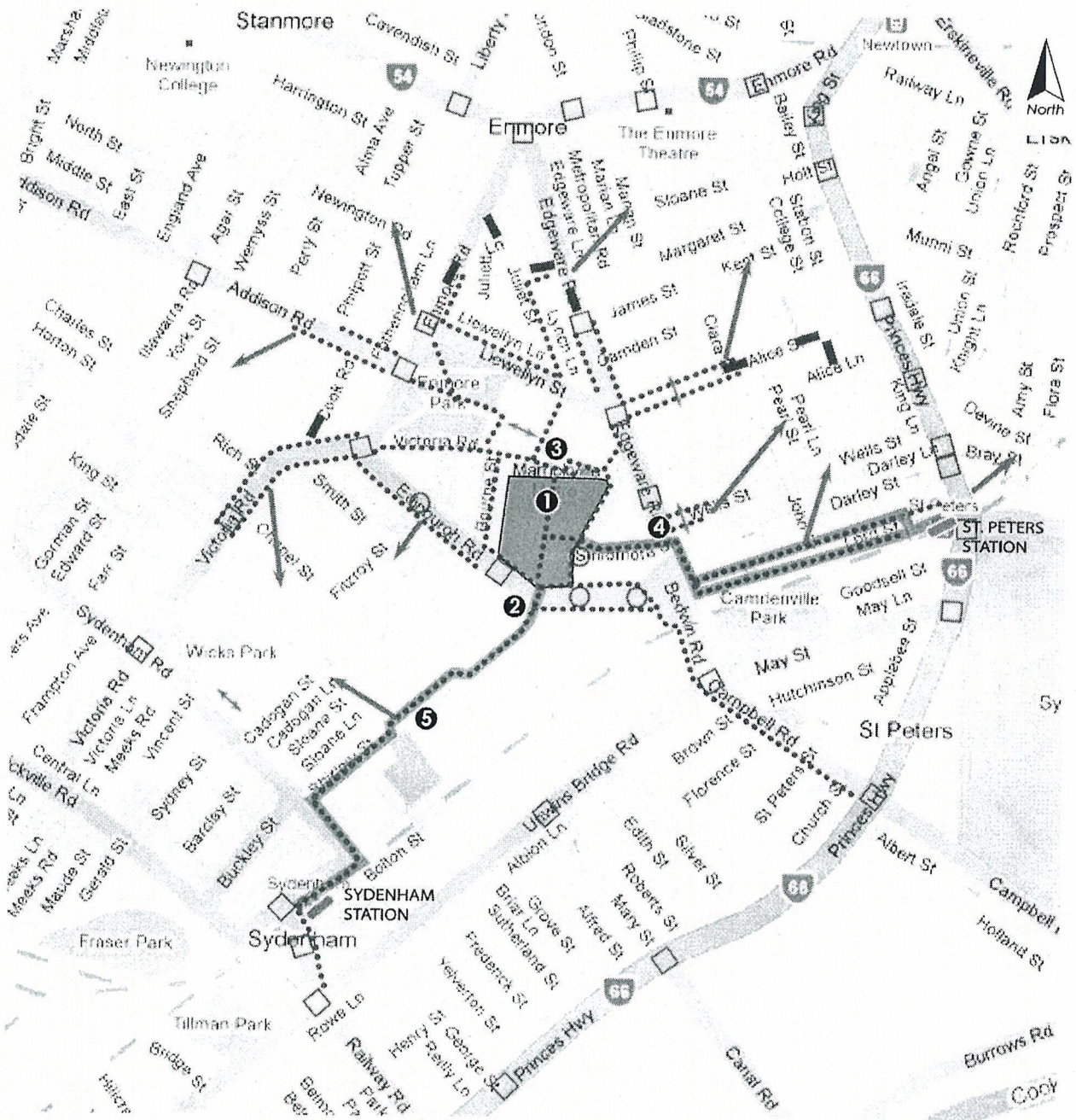
- Routes 308, 352
- Route 355
- Bus Stop

Figure 9

**Halcrow**

# PROPOSED PEDESTRIAN ROUTE IMPROVEMENTS

MARRICKVILLE METRO MAP



## 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 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



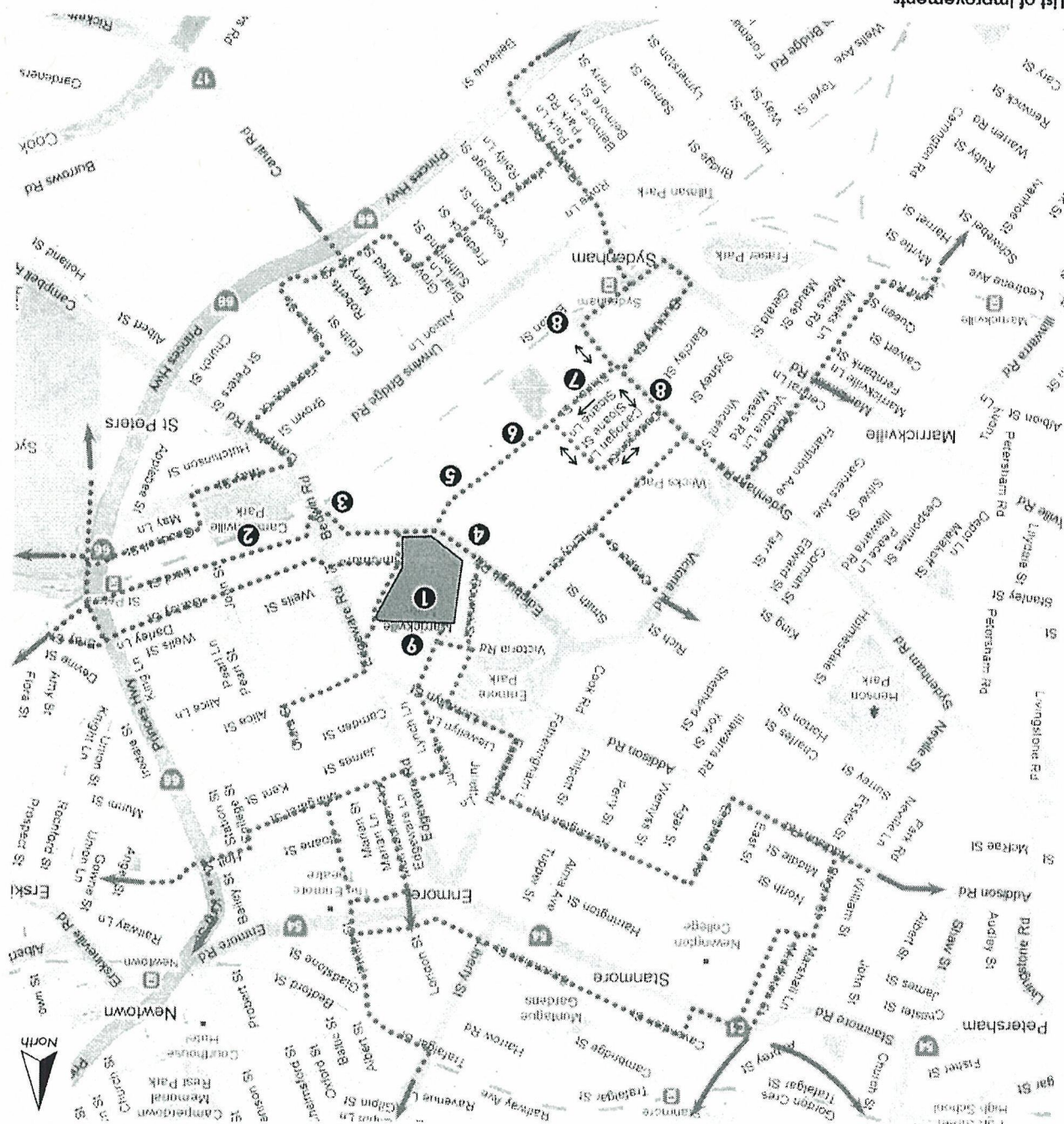
Figure 11

Key

- ..... Bicycle Routes Metro
- ..... Connections to wider bicycle networks
- ..... Proposed Regional Route 5 to Campedown

- 1 Customer bicycle rails, staff bicycle parking enclosure
- 2 Marked bicycle symbols on street in Lord and Darley Streets
- 3 Marked bicycle symbols on street in Edgeware Road under Bedwin Road
- 4 Marked bicycle symbols on street in Edinburgh Road
- 5 Marked bicycle symbols on street in Sydney Steel Road
- 6 Lighting and signs for off street shared bicycle pedestrian path between Steel Road and Shilow Street
- 7 Marked bicycle symbols on street (northbound)
- 8 Bicycle marking and signs for a two way shared bicycle-pedestrian footpath in Sydenham Road and Railway Parade
- 9 Marked bicycle symbols in Victoria Road to L7 and Juliet Street

**List of Improvements**



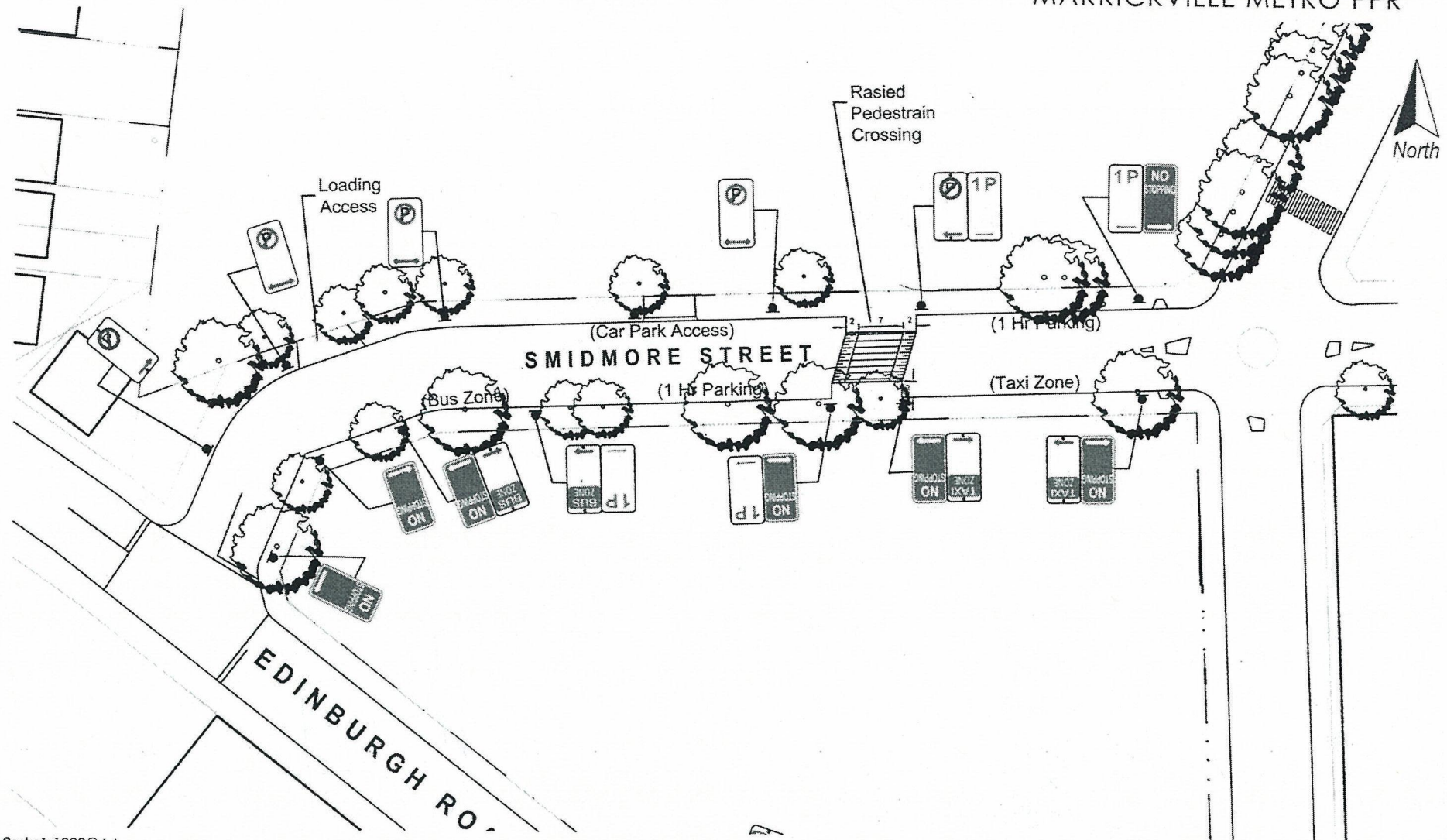






# PROPOSED PARKING CONTROLS - SMIDMORE STREET

MARRICKVILLE METRO PPR



Scale: 1:1000@A4

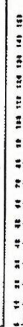
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Filename: CTRLGWda12

**Figure 7**

Date: 02 November 2010

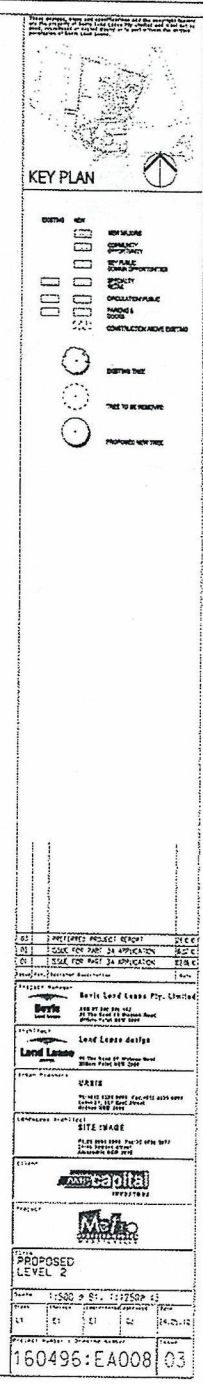






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PROPOSED LEVEL 2				
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Pre-Cell Number + Spinning number				Code
160496:EA008				03



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1:15.625  
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