

Our ref: 10132

18th March 2011

Director-General
Department of Planning
GPO Box 39
SYDNEY
NSW 2001

**RE: OBJECTION TO PREFERRED PROJECT REPORT (MP 09_0191) FOR THE
RETAIL EXPANSION AT MARRICKVILLE METRO – 34 VICTORIA ROAD, 13-
55 EDINBURGH ROAD**

We are acting on behalf of The Terrace Tower Group the owner of Westfield Eastgardens and other retail complexes throughout metropolitan Sydney. We refer to our objection to this proposal dated 2nd September 2010 (see **Attachment A**).

We have reviewed the Preferred Project Report dated December 2010 and response to public submissions.

It is our opinion that the preferred project seems to be very much the same as the original scheme. All of the primary components remain the same being the inclusion of a new Discount Department Store (DDS) and a new supermarket with accompanying specialty retailing. There has been a reduction of the bulk with stepping in of the development on the upper levels.

The stated reduction of retail floor space from the previous scheme is around 5,000 sqm GLA (ie. 21,470 sqm down to 16,767 sqm). This still leaves a proposed new centre of around 40,000 sqm GLA operating as a major regional retail centre.

The primary change (including a large part of the stated "reduced" retail floor area) relates to the removal of the retail link over Smidmore Street – connecting both components of the centre. This original part of the proposed retail expansion should never have been proposed without owners consent and is misleading for the applicant to now claim it as a retail reduction to the proposed scheme.

The Preferred Scheme now relates to the individual parcels on either side of Smidmore with a concept vision for traffic calming – pedestrian crossing at grade in Smidmore Street. This however still requires Council consent for any works within the road reserve.

It is our understanding that Marrickville Council have objected to the proposed development and will not give consent to the use of the airspace or works over Smidmore Street. They have also objected to the proposal on the grounds of planning policy.

It is our opinion that the proposed Marrickville Metro Concept Plan is entirely inconsistent with the provisions of the above State Government South Subregion and established planning policies to integrate land use and transport.

It is clearly not consistent with the local planning policies and controls for the locality and would undermine Marrickville Council's strategic planning if approved in its current form.

The location of two discount department stores, three major supermarkets, mini major stores and specialty retailing on this isolated site in Marrickville will not serve any other purpose other than promoting itself a single car orientated destination attracting patrons into this local neighbourhood from throughout the surrounding region.

It is an inappropriate out-of-centre location, without any direct connections to major collector roads or the associated support of existing public transport services. The proposal does not make the best use of road and public transport infrastructure.

There is no overriding community benefit to establishing a major regional retail destination on this stand alone isolated site in Marrickville. The proposal is considered to be an inappropriate overdevelopment of the site.

Yours faithfully



INGHAM PLANNING PTY LTD

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Our ref: 10132

2nd September 2010

Director-General
Department of Planning
GPO Box 39
SYDNEY
NSW 2001

Att:

**RE OBJECTION TO CONCEPT PLAN (MP 09_0191) FOR THE RETAIL
EXPANSION AT MARRICKVILLE METRO – 34 VICTORIA ROAD, 13-55
EDINBURGH ROAD and part of SMIDMORE STREET**

We are acting on behalf of The Terrace Tower Group and Westfield Limited the owners and operators of Westfield Eastgardens and other shopping complexes in major retail centres throughout metropolitan Sydney.

We are writing this submission as an objection to the concept plan that the Department of Planning has received to redevelop the existing site and land immediately adjoining the existing Marrickville Metro into a significantly expanded regional shopping centre.

BACKGROUND

Prior to its acquisition in 2004 by the current owner (AMP Capital Investors), the subject site was owned by New World Properties who developed the site on behalf of Coles in 1985. The rezoning of land and development consent at the time allowed the partial demolition of factory buildings on the site while retaining and respecting the historical setting of the locality including the retention of the heritage listed 'Mill House' and remnants of the former factory walls.

The existing shopping centre fronts Victoria Road to the north, Murray Street to the east and Smidmore Street to the south and is adjoined by small lot residential housing to the north and west. The centre is a predominantly single storey retail building comprising major tenant including a Kmart, Woolworths and ALDI as well as a range of specialty shops. Car parking is located at roof top level with existing vehicle ramp access via Smidmore Street and Murray Street.

The existing Marrickville Metro Shopping Centre has a site area of approximately 3.566 hectares and has an existing gross floor area of 29,638 sqm. The existing FSR is approximately 0.83:1.

THE PROPOSED DEVELOPMENT

The proposed concept plan application (MP 09_0191) seeks consent for the expansion of the existing shopping centre into effectively a new regional shopping centre by the addition of a further 28,297 sqm of gross floor area providing a doubling of retail floor space from 22,933 sqm to 44,403 sqm.

The proposed retail expansion includes the redevelopment of an existing factory warehouse site on the opposite side of Smidmore Street known as 13-55 Edinburgh Road which has a site area of 8,800 sqm.

The proposal also envisages the closure and redevelopment of part of Smidmore Street including a public plaza and retail link.

The Environmental Assessment Report prepared by Urbis states in Section 5 (pg.19) that the proposal has three key elements:

- *An extension of retail floor area at first floor level above the existing shopping centre building with further additional roof top parking above;*
- *Redevelopment of the existing industrial land south of Smidmore Street (13-55 Edinburgh Road) to create a two level retail addition to the shopping centre with car parking above.*
- *The closure of Smidmore Street between Edinburgh Road and Murray Street in order to create a new pedestrian plaza including a two storey retail link and car parking access.*

The Economic Impact Assessment report indicates that the proposed retail floor area will primarily accommodate a new discount department store, a new full line supermarket, mini majors and specialty retail space.

The proposed Marrickville Metro Concept Plan therefore seeks consent for a gross floor area of around 58,000 sqm and will establish this isolated stand-alone site within Marrickville as a regional shopping complex comprising around 44,000 sqm of retail floor space as follows:

- 2 discount department stores including Kmart and new DDS(14,759 sqm)
- 3 full line supermarkets including Woolworths, ALDI and new full line supermarket (10,417 sqm);
- mini major tenants (3,279 sqm)
- specialty retail shops (12,459 sqm)
- non-retail (3,489 sqm)

A total of 1,815 carparking spaces are proposed on the site with the retention of part of the existing roof top parking at Level 1 and new parking at levels 2 and 3.

POINTS OF OBJECTION

1. The Marrickville Metro Concept Plan is not supported by Marrickville Council and is unlawful without Council consent.

The proposed Concept Plan for a major regional retail centre has been designed based on the proposed closure of Smidmore Street and major retail redevelopment on either side of this street. We understand that Marrickville Council does not support this concept and has not issued owners consent for any works within Smidmore Street.

The Director General Requirements and Department of Planning's advice raised concerns that the issue of *"land ownership and future management of Smidmore Street"* had not been resolved and identified it as a key issue in the assessment requirements.

Despite this advice, the applicant has lodged the Concept Plan application including the Smidmore Street land (without owners consent) and all design analysis and detailed plans for the proposed regional retail centre are based on the road closure concept.

In Section 5.6 of the Environmental Assessment the applicant makes the assumption that the application *"can be technically exhibited and assessed without owner's consent provided that such consent is forthcoming prior to the approval of the Concept Plan."*

The report then goes on to suggest an *"alternative option"* for Smidmore Street in the event that there is no agreement to sell and close Smidmore Street. The alternative plans indicate effectively the same major retail redevelopment on both sides of Smidmore Street with the exception that the street remains a trafficked street.

No details are provided as to how both sides of this major retail redevelopment would operate effectively as a cohesive regional retail centre without details of works within the road to provide pedestrian safety and amenity, understanding of the pedestrian movements to and from the carparking areas required to serve the demand for such a major retail centre and the operation of loading docks on either side of the street.

It is noted that under the provisions of Clause 30 of Marrickville LEP 2001 no works are allowed to be carried out within any public road without development consent and consent from Marrickville Council.

It is considered that the proposed Concept Plan application is flawed and unlawful without the support and consent of Marrickville Council. The Concept Plan has been designed and analysed based on a false premise of road ownership being provided to the applicant. It is considered that the proposal cannot be properly assessed without owners consent provided by Marrickville Council and the appropriate processes undertaken under the Roads Act for closure and sale of public land. The *"alternate option"* provided is scarce and uncertain in detail and considered inappropriate for a major regional retail shopping centre.

It is considered that in accordance with the Department of Planning's advice no further assessment of this Concept Plan is undertaken until such time as the land ownership and future management of Smidmore Street is resolved.

If the proposal will not include Smidmore Street, then a new Concept Plan should be lodged with an environmental assessment, design and technical reports based on the correct site and relevant constraints and opportunities of such land.

2. The subject site is inappropriate for a regional shopping complex.

The proposed expanded shopping centre of over 57,000 sqm of gross floor area including two discount department stores and three full line supermarkets will significantly expand the role of the existing complex to that which can be classified as a regional shopping centre.

The suburb of Marrickville is located within an area which is currently served by both the existing Marrickville Town Centre and the stand alone shopping complex known as Marrickville Metro.

The Marrickville Town Centre functions as the predominant district level centre in Marrickville LGA. It is located at the intersection of the major collector roads being Marrickville Road and Illawarra Road and is well served by public transport with both bus and rail networks serving the centre. Furthermore, the higher order character of the Marrickville Town Centre is evident in the nature of commercial and civic functions in the centre as well as the variety of land uses and density of residential development surrounding the centre.

In comparison, Marrickville Metro is an isolated stand alone retail complex located within an enclave of low density residential housing, conservation areas and an older industrial precinct. Since it's redevelopment in 1985 it has provided a lower order secondary role providing a range of convenience and specialty retail outlets that serve the immediate neighbourhood as well as the wider district.

The Marrickville Metro shopping centre provides a supporting role to the Marrickville Commercial Centre. It is a predominantly car orientated retail destination and is only served by a bus routes that travel from Marrickville terminate at the centre and then loop back towards Marrickville Road. The site is not located on a major arterial road and is not suited to a regional shopping destination.

It is considered that the proposed development, which includes the establishment of two discount department stores and three supermarkets on a stand-alone isolated site, is incompatible with the character of the area, is inconsistent with the supporting role that this centre plays within the Marrickville LGA and will fragment the established role and function of centres within the Marrickville LGA as a whole.

3. The proposal is inconsistent with the Draft South Subregional Strategy

The Draft South Subregion is part of the State Government's Metropolitan Subregional Strategy documents that have been released for public exhibition.

The Metropolitan Strategy identifies definitions for centre types. These are termed Strategic Centres which include Global Sydney, Regional Cities, Specialised Centres and Major Centres, and small local centres which include Town Centres, Villages, Small Villages and Neighbourhood Centres. A copy of the South Subregion Centres Strategy and typology of centres is provided as **Appendix A**.

The Marrickville Metro site is identified as a 'village centre' under the provisions of the Draft South Subregional strategy. It is defined as a village centre that supports a residential area within a "5 to 10 minute walk contains a small supermarket, hairdresser, take-away food shops. Contain between 2,100 and 5,500 dwellings."

Marrickville Town Centre is identified as the higher order "Town Centre" within the locality.

It is our opinion that the proposed Marrickville Metro Concept Plan is entirely inconsistent with the provisions of the above State Government South Subregion and established planning policies to integrate land use and transport.

The location of two discount department stores, three major supermarkets, mini major stores and specialty retailing on this isolated site in Marrickville will not serve any other purpose other than promoting itself a single car orientated destination attracting patrons into this local neighbourhood from throughout the surrounding region.

It is an inappropriate out-of-centre location, without any direct connections to major collector roads or the associated support of existing public transport services. The proposal does not make the best use of road and public transport infrastructure.

Furthermore, the proposed Concept Plan makes no attempt to embrace a mix of land uses on the site including residential development. In this regard the Draft South Subregional Strategy states that:

"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 increases in addition to the provision of higher density housing within the locality to achieve Town Centre status."

Despite the indication within the State Government's Draft Subregional Strategy, the proposal simply seeks to achieve a higher order centre status by proposing what is effectively a major regional retail centre expansion. There is no provision for residential development that could be designed along with some additional retail/commercial development to provide a sustainable working and living environment within this locality.

The proposal is inconsistent with the Draft South Subregional Strategy released by the Department of Planning.

4. The proposal will rezone Industrial land adjacent to a village centre to establish a regional retail centre

The proposal seeks to redevelop older industrial land adjacent to an identified village centre to establish a major regional retail centre.

The Integrated Land Use and Transport policy of the State Government includes criteria to direct retailing and other trip generating activity to strategic centres. The

Metropolitan Strategy aims to concentrate new and expanded investment in strategic centres.

In regard to the renewal of old industrial areas the Metropolitan Strategy states that the Government will work with industry and local government to develop planning mechanisms to facilitate renewal and that retailing in industrial areas will be limited.

The Draft South Subregional Strategy states that:

"These old industrial precincts are no longer suitable for the type of industry they were designed to accommodate and cannot easily be converted to accommodate new industrial uses. They are more appropriately developed with mixed development, which may include a component of residential. Further investigation into these areas needs to be undertaken and any future development should be proposed in the form of a masterplan to ensure a holistic strategic planning review of each area is undertaken and be consistent with the existing 117 Direction (1.1 Business and Industry)."

The Ministerial Direction on Business and Industry requires that any LEP amendment ensures that any new employment areas are in accordance with a strategy approved by the Director General of the Department of Planning and requires that the proposal is in accordance with the relevant sub-regional strategy.

As discussed previously, Marrickville Metro is identified as a village centre under the Subregional Strategy and is seeking under this Concept Plan to take on a higher order retail role of a major strategic centre. The proposal simply seeks to convert redundant industrial and lower order village centre land to a major regional retail centre without embracing any residential development or appropriate mixed use development.

The proposal is inconsistent with the State Government's Metropolitan Strategy and Ministerial Directions for Industrial land.

4. The proposal is inconsistent with the Draft Activity Centres Policy (May 2010)

The environmental assessment has failed to assess the project in accordance with the provisions of the Draft Activity Centres Policy (May 2010).

The Draft Activity Centres Policy states that in general there will be a presumption in favour of a development proposal consistent with the zoning of the site on which it is proposed. However, when considering edge-of-centre or out-of-centre proposals that require a rezoning then the proposal needs to demonstrate that the development meets the Sequential Test and Site Suitability Criteria to ensure compliance with policy.

The proposed Concept Plan requires rezoning of the land not only to provide a greater density of development on the existing site but also to rezone the adjoining industrial land to allow for the regional retail shopping centre.

It is considered that if the State Government supports the concept of introducing a new discount department store or new supermarkets into the Marrickville LGA, a review of

all existing centres should be undertaken including an appropriate strategic assessment for alternative locations for such retail land uses.

It is considered that prior to any further consideration of the current project that the Department of Planning should ensure the applicant provides an assessment of the Draft Activity Centres Policy (May 2010) including the Sequential Test and Site Suitability Criteria assessment as detailed in **Appendix B**.

5. The proposal is inconsistent with the Marrickville LEP 2001 and Business Centres DCP No.38

The proposed development is currently prohibited under the existing zoning of the land and statutory floor space restrictions.

The current statutory planning controls for the subject site have been specifically designed to ensure that the role and function of the Marrickville Metro site complements the role and function of other centres within the LGA and respects the planning constraints of the locality.

The sensitivity of the location of this shopping centre within the heritage context of the locality and the scale and nature of surrounding land uses has been clearly identified within the Council's existing and proposed planning controls.

For example, the site specific floor space control within Marrickville LEP 2001 and reiterated within the density provisions of the Business Centre DCP provide for a maximum FSR of 0.8:1. Marrickville Town Centre land zoned General Business has a 2:1 floor space ratio control reflecting the higher order nature of the commercial centre.

The planning controls acknowledge that this site should not develop as a major regional shopping centre destination. The objective of the floor space control within Marrickville Councils' DCP No.28 is:

"To ensure that the scale and intensity of development within the Marrickville Metro Centre is consistent with the desired role and function of that centre and the capacity of the local road network to handle the traffic likely to be generated."

The existing Marrickville Metro already has a Kmart, Woolworths and ALDI store and includes specialty retailers and services including Dick Smith Electronics, Clothing and Apparel shops, Telstra Shop, Amcal Chemist, ANZ Bank, Commonwealth Bank, Australia Post, NRMA and RTA etc. The existing centre operates in accordance with the zoning of the land and provides for all the goods and services required to serve the local community.

6. The proposal will significantly increase traffic movements in and through the residential neighbourhood surrounding Marrickville Metro.

The Marrickville Metro shopping centre is generally an isolated centre that is surrounded by low density residential development on two sites and the old industrial precinct to the north.

It is clear from the documentation provided with the application that the development is intended to serve a much wider area than the needs of just residents within the immediate neighbourhood.

It is considered that providing a major retail centre in a low scale residential neighbourhood will significantly increase traffic movements to and through the area which will have inappropriate traffic and amenity impacts on the locality.

A review of the traffic assessment provided with the application has been undertaken by Colston Budd Hunt & Kafes Pty Ltd (see **Appendix C**). This review indicates that the assessment undertaken is deficient in the assumptions made in regard to traffic generation and implications on the surrounding intersections.

The proposed traffic generation rates are below RTA standards and incorrect assumptions have been made in regard to modal split of patrons travelling to the centre. The resulting traffic generation will have significant implications on the local road network and the performance of local road intersections.

To locate a major car-orientated retail destination in an isolated residential/industrial precinct with access from local residential streets is not sound planning practice and is inconsistent with the planning policies of integrating land use and transport throughout metropolitan Sydney.

6. The proposal is inconsistent with the heritage character and streetscape setting of the locality

The Council Business Centres DCP states that the Townscape and building guidelines for the Marrickville Metro site should ensure that the *"building is sensitive to the heritage context and the scale and nature of adjacent land uses."*

"What differentiates it from many such shopping centres around Sydney is that Marrickville Metro has been designed within the setting of a number of identified items of environmental heritage and has involved the adaptive re-use and redevelopment of these items."

To propose a complete redevelopment of the site with a multi storey regional retail centre including two discount department stores and three supermarkets is totally contrary to the recognised and desired character of the locality. It would completely change the character of the site from harmonious neighbourhood centre serving the surrounding residential locality to a major car-orientated regional retail shopping destination.

The shopping centre would become the overbearing dominant built form within the locality and will reduce the setting of the heritage items within the locality and the character of the surrounding low density residential development.

The proposed shopping centre redevelopment extends to the site boundaries and is built to a height adjacent to residential interface of up to 3 storeys. Little attempt has been made to provide setbacks of the built form and introduce meaningful landscape edges. The proposal simply uses the redundant industrial buildings to justify large built forms to the site boundaries with street trees squeezed in along the Council footpaths.

It is considered that the proposal makes no attempt to develop the land in a manner which is sympathetic to the established character of the locality. To demolish, excavate and develop across the entire site with no meaningful setbacks is excessive for this village centre locality.

It is considered that the proposed development is completely inconsistent with the desired future character of this precinct and does not respect the existing heritage items, conservation area or context of surrounding land uses.

7. The economic impact of the significant expansion of retailing on this isolated site is inappropriate

While the applicant's economic studies indicate that there is demand for more retailing within the region, it is considered that the proposed doubling of retail floor space to a centre of over 44,000 sqm of retail space on this stand alone isolated site within Marrickville LGA will significantly increase the regional role of Marrickville Metro to the detriment of other commercial centres within the LGA.

The Economic Impact Assessment states that "the expanded Marrickville Metro is likely to take on a more comprehensive role in the retail hierarchy, meeting a greater range of trade area residents' comparison shopping needs than does the centre's current offer. As such it will compete more directly with the higher order facilities located beyond the trade area, such as the Sydney CBD, Westfield Eastgardens, Burwood and Bondi Junction, Ashfield Mall and the Campsie Centre."

The significant expansion of retailing within a lower order centre in an isolated location amongst low density housing and local roads to establish a new strategic retail centre similar to those mentioned above is inconsistent with sound planning principles.

All of the above competing strategic centres are located on major access roads with access to regional public transport routes and surrounded by higher density housing and significant commercial uses.

For example, Westfield Eastgardens is a clearly identified regional retail shopping centre that is accessed via two major roads and served by regional bus routes including the provision of an bus interchange on site. The site includes a commercial office building and is surrounded by medium density housing.

In regard to the economic impact on other centres, the Economic Impact Assessment indicates a forecasted trading impact of around 5% and states that *"these impacts are not likely to be so significant as to threaten the ongoing viability on any one retail facility or strip."*

Notwithstanding, it is considered that the proposed additional retail expansion at Marrickville Metro will effectively absorb all retail development potential into one isolated locality and will further segregate and entrench the role of the Marrickville Town Centre and other retail centres within the established inner south suburbs.

Conclusion

The proposed development is currently prohibited under the existing zoning of the land and requires Council's consent to undertake the Concept Plan as currently proposed. Without the support and consent of Marrickville Council it is considered that the development is uncertain and any assessment of the proposal is flawed. The alternate option for Smidmore Street has not been properly designed and is a significant constraint for the proper operation of a regional retail shopping centre on the site.

The proposed development is totally inconsistent with the desired planning outcome for the site as detailed in Council's LEP and DCP and the provisions of the draft South Subregional Strategy. It exceeds the primary planning controls for any district centre and will fragment the established hierarchy of commercial centres in the region, changing the nature of the existing centre from a village to a regional shopping centre destination.

The proposal will have significant implications on the amenity of the surrounding low density residential population and does not respect the established character of this historically significant locality.

The traffic generation resulting from this proposed major retail destination will have significant impacts on the surrounding local road network and performance of intersections.

The location of two discount department stores, three major supermarkets, mini major stores and specialty retailing on this isolated site in Marrickville will not serve any other purpose other than promoting itself a single car orientated destination attracting patrons into this local neighbourhood from throughout the surrounding region.

There is no overriding community benefit to establishing a major regional retail destination on this stand alone isolated site in Marrickville. The proposal is considered to be an inappropriate overdevelopment of the site.

Yours faithfully

INGHAM PLANNING PTY LTD

APPENDIX A

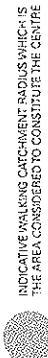
Draft South Subregional Strategy Extract



Abstract

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INDEX













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




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CENTRES AND CORRIDORS SOUTH

TABLE 7 CENTRE TYPES AND METRO ELEMENTS

	CENTRE TYPE	RADII	SUMMARY
STRATEGIC CENTRES	 GLOBAL SYDNEY	2km	The main focus for national and international business, professional services, specialised health and education precincts, specialised shops and tourism. It is also a recreation and entertainment destination for the Sydney region and has national and international significance.
	 REGIONAL CITY	2km	Providing a full range of business, government, retail, cultural, entertainment and recreational activities, they are a focal point where large, growing regions can access good jobs, shopping, health, education, recreation and other services and not have to travel more than one hour per day.
	 SPECIALISED CENTRE	approx 1km	Areas containing major airports, ports, hospitals, universities, research and business activities. These perform a vital economic and employment role which generate metropolitan-wide benefits.
	 MAJOR CENTRE	1km	Major shopping and business centre serving immediate subregional residential population usually with a full scale shopping mall, council offices, taller office and residential buildings, central community facilities and a minimum of 8,000 jobs.
LOCAL CENTRES	 TOWN CENTRE	800m	Town Centres have one or two supermarkets, community facilities, medical centre, schools, etc. Contain between 4,500 and 9,500 dwellings. Usually a residential origin than employment destination.
	 STAND ALONE SHOPPING CENTRE	N/A	Internalised, privately owned centres located away from other commercial areas, containing many of the attributes of a Town Centre but without housing or public open space—may have potential to become a traditional town centre in the long-term.
	 VILLAGE	600m	A strip of shops and surrounding residential area within a 5 to 10 minute walk contains a small supermarket, hairdresser, take-away food shops. Contain between 2,100 and 5,500 dwellings.
	 SMALL VILLAGE	400m	A small strip of shops and adjacent residential area within a 5 to 10 minute walk. Contain between 800 and 2,700 dwellings.
	 NEIGHBOURHOOD CENTRE	150m	One or a small cluster of shops and services. Contain between 150 and 900 dwellings.
	 RURAL TOWN, VILLAGE OR NEIGHBOURHOOD CENTRE	as above	Located in rural zones outside metropolitan urban areas with similar roles to towns, villages and neighbourhoods but rural in character with a wider driving catchment.

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	METRO ELEMENTS	SUMMARY
	ENTERPRISE CORRIDOR	Areas which provide low cost accommodation for a range of local and regional services, including start-up offices, light industrial, showrooms, building supplies and retail, which benefit from high levels of passing traffic (over 50,000 vehicles per day). They provide a valuable buffer between residential development and the road.
	EMPLOYMENT LANDS	Traditional industrial areas and business and technology parks for higher order employment. They are vital to supporting the economy and ability to service the city and incorporate light industries, heavy industry manufacturing, urban services, warehousing and logistics and high-tech based activities.
	MAGNET INFRASTRUCTURE	An asset that attracts activities to co-locate with it to form an industry cluster. It is not limited to traditional infrastructure, but may include research and medical facilities, specialised educational institutions and film studios.
	METROPOLITAN ATTRACTOR	A place which draws visitors from across the metropolitan region, interstate and internationally which in turn creates transport and other planning needs.
	ECONOMIC CORRIDOR	Areas relating to gateway infrastructure (airport, port, motorway) containing important economic activities in Strategic Centres and Employment Lands.

APPENDIX B

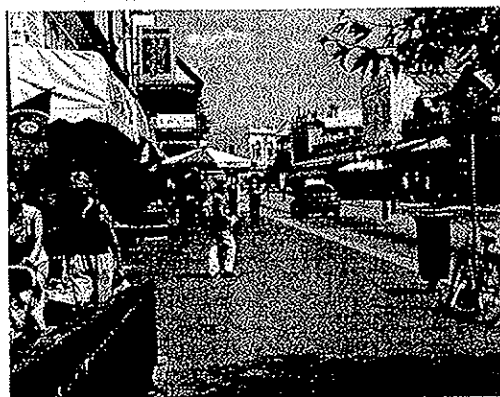
Draft Activity Centres Policy Extract



Planning

Activity Centres Policy

May 2010



PART B IMPLEMENTATION

3. Overview: Applying the Policy within the Planning Framework



3.1 Implementing the Policy

Regional and strategic planning policies and comprehensive LEPs should plan to accommodate commercial and other development in activity centres based on an analysis of current and potential demand.

These strategies or plans should not merely reflect the existing pattern of development in an area but should plan to provide suitably zoned land for current and future demand in well located centres.

This will obviate the need for frequent rezoning applications resulting in a piecemeal approach to planning to meet the needs of the community and business investment.

In the event that a proposed new development cannot find adequate space and opportunity within an existing centre, and there is merit in that proposal, an alternative location will need to be considered.

In general there will be a presumption in favour of a development proposal consistent with the zoning of the site on which it is proposed. If, following an analysis of the land available to meet projected demand, there is a demonstrable shortfall there will be a presumption in favour of rezoning to accommodate that demand.

3.2 Considering Out of Activity Centre Proposals

Preference is given to clustering development in existing or planned activity centres whether they are major, strategic, village, neighbourhood or any

other type of centre, for example a bulky goods cluster.

If development cannot be accommodated on existing zoned land in centres, alternative sites will need to be identified to meet the demand. In this respect the policy is flexible and allows for the rezoning of land for development at the edge-of-centre or in out-of-centre locations where it can be demonstrated that the development generally meets the site suitability criteria.

Therefore the policy provides a *Sequential Test* and *Site Suitability Criteria* to assist with the assessment of edge or out of centre proposals when implementing the policy.

a) The Sequential Test

The *Sequential Test* should be applied when considering out of centre proposals. When giving consideration to edge-of-centre or out-of-centre proposals, the following steps should be taken:

Step 1

Firstly, it must first be demonstrated that there are no suitable sites within an existing or planned new activity centre that can satisfy the demand to be accommodated. This may be achieved by adjusting future intentions for a centre and could include:

- increasing height and floor space controls,
- permitting a broader mix of uses, or
- actions to facilitate site availability or site consolidation.

Step 2

Secondly, it must then be demonstrated that there are no suitable sites in an edge-of-centre location that can satisfy the demand to be accommodated.

Step 3

Thirdly, an out-of-activity centre site that can satisfy the demand to be accommodated may be considered if it meets the *Site Suitability Criteria* and is consistent with relevant local or regional planning strategy.

b) The Site Suitability Criteria

The Site Suitability Criteria should be used when considering the merits of alternative locations to accommodate development.

These criteria can be applied when assessing the merits of sites on the edge or outside of an existing or planned new activity centre when considering:

- alternative sites to accommodate demand as part of the strategic planning processes
- spot rezoning proposals and development applications for individual sites.

The site suitability criteria are:

- (a) **Strategy consistent:** is the proposed use of the site consistent with or implementing the relevant regional, sub-regional or local strategy?
- (b) **Infrastructure:** capacity to support future demands, e.g. traffic capacity, sewerage and water services.
If not, are arrangements in place for these to be provided?
- (c) **Access considerations:**
 - (i) Good public transport and road access for employees, customers and suppliers
 - (ii) Good pedestrian access

If not, are arrangements in place for these to be provided?
- (d) **Urban design opportunities:** potential to:
 - (i) integrate with surrounding land uses;
 - (ii) increase the amenity of the local area.
- (e) **Competing land issues** – impact on
 - (i) housing supply and affordability
 - (ii) industrial land supply
 - (iii) on choice and competition in the locality

For instance, does the proposal affect delivery of other targets or objectives for the area – for example if the land is currently residential and is proposed to be changed to commercial, would this affect achieving dwelling targets.
- (f) **Proximity to labour markets and associated housing (jobs closer to home)**
 - (iv) for workers with required skills
 - (v) for management
- (g) **Environmental considerations**
 - (i) hazards, such as flooding, bushfire, or coastal, contaminated land
 - (ii) opportunities to contribute positively to environmental outcomes

(h) Public benefit considerations

- (i) provides a broader public benefit from being located at the alternative site.

Priority should be given to sites which perform best against the criteria. It is not necessary for a proposal to meet all the criteria in order to be supported.

The relative weight to be attached to performance against the criteria will depend upon the issues raised by the case. In many instances it may be possible to address the criteria by amendments made to a proposal.

For example, provision may be made to make up shortcomings in infrastructure provision whereas there may a key regional strategy aim to deliver new development of the type proposed to help accommodate projected growth.

3.3 Key Implementation Tasks

This Part provides guidance on how the Policy should be applied in four key tasks to help facilitate meeting its aims:

a) Metropolitan and regional strategic planning

Summary of Key Considerations

- (a) Plan a network of activity centres to provide for the future growth in the region, allow flexibility for existing centres to grow and for new centres to form to provide certainty for public and private investment
- (b) Ensure growth is accommodated through a network of activity centres that are forward looking and provide flexibility for existing centres to grow and new centres to form
- (c) Plan for changing consumer preferences and behaviour over time
- (d) Plan for different patterns in metropolitan and regional areas
- (e) Only adopt centres descriptions to indicate current and/or future performance of a centre - not to limit future growth
- (f) The *Sequential Test* and *Site Suitability Criteria* should be applied to help determine where growth is best accommodated

- (g) For sectors experiencing significant growth consider undertaking an analysis of available zoned land and floorspace to provide an understanding of the current supply and likely future demand for zoned land and floorspace (Supply and Demand Analysis)
- (h) For sectors experiencing significant growth consider preparing minimum zoned land targets
- (i) Monitor the availability of zoned land and the supply of floorspace.
- (b) The assessment will take into consideration the economic, social and environmental costs and benefits.
- (c) The trading impacts of a proposal upon another business will not normally be a relevant consideration.
- (d) The commercial viability of a development proposal will not normally be a relevant consideration.

b) Local strategic planning

Summary of Key Considerations

- (a) Councils to undertake a detailed analysis of opportunities to accommodate development in existing or new activity centres as part of the development of comprehensive LEPs
- (b) The *Sequential Test* and *Site Suitability Criteria* to be applied by Councils to determine how growth is best accommodated
- (c) Preparing strategies to deal with different types of development which may need to be located out of centre locations.

c) Spot rezoning

Summary of Key Considerations

- (a) The *Sequential Test* is to be applied when assessing edge-of-centre or out-of-centre proposals to ascertain whether the development can be located in existing or new activity centres
- (b) When there is not sufficient zoned land available to meet projected demand there will be a presumption in favour of rezoning more land to meet the demand.
- (c) Councils to consider the *Site Suitability Criteria* when assessing merits of proposed rezoning proposals
- (d) When a planning proposal is submitted to the Department of Planning which makes strategic changes to a planned or existing activity centre, an assessment should be made of the proposal as part of the LEP 'Gateway' process. If the rezoning proposal is permitted through the Gateway, the process will be commenced to amend the LEP to permit the use on the site. If the zoning is changed to permit the use, the development proposal will be assessed on its merits.

d) Development applications

Summary of Key Considerations

- (a) Where a development proposal is consistent with the permitted use in a zone, the development should be assessed on its merits.

APPENDIX C

**Traffic Assessment Review by
Colston Budd Hunt & Kafes Pty Ltd**

TERRACE TOWERS GROUP

REVIEW OF TMAP
SUPPORTING PART 3A CONCEPT
PLAN APPLICATION FOR
MARRICKVILLE METRO PROPOSED
EXTENSIONS

SEPTEMBER 2010

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1. Colston Budd Hunt & Kafes Pty Ltd has been commissioned by the Terrace Towers Group to review the Traffic Management and Accessibility Plan (prepared by Halcrow, dated July 2010) that supports the Part 3A Concept Plan Application for the proposed extensions to Marrickville Metro Shopping Centre.
 2. The proposed extensions comprise:
 - increasing retail area from some 23,000m² to 44,000m²;
 - increasing parking provision from some 1,080 to 1,815 spaces;
 - extensions include a second discount department store (8,000m²) and additional supermarket (4,000m²) as part of additional 21,000m² retail;
 - closure of Smidmore Street between Edinburgh Road and Murray Street.
 3. The TMAP report sets down a number of proposals with regards to public transport, taxis, pedestrian aspects and green travel plan. Subject to appropriate implementation of these measures, these aspects would generally be supported. The proposed parking provision is also considered to be appropriate.
 4. However, there are concerns regarding the traffic effects of the proposed extensions that have been analysed in the report. These concerns are set down through the following sections:
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- traffic generation;
 - distribution and assignment;
 - traffic effects;
 - car park access controls.

Traffic Generation

5. Surveys found that the existing centre generated some 1,040 and 1,635 vehicles per hour on Thursday afternoon and Saturday daytime respectively. This is equivalent to 4.5 and 7.1 vehicles per 100m².
 6. The RTA Guide gives rates of 5.9 and 7.5 vehicles per 100m² for centres in the range of 20,000 to 30,000m². Hence, surveyed rates are some 77 and 95 per cent of the RTA rates.
 7. The report estimates the traffic generation of the expanded centre based on RTA Guide generation rates. For centres in the range of 30,000m² to 40,000m² these rates are 4.6 and 6.1 for Thursday and Saturday respectively.
 8. The report reduces these rates to 77 and 95% to reflect the existing relationship between surveyed and RTA Guide rates. This leads to Thursday and Saturday generations for the expanded centre of some 1,570 and 2,575 vehicles per hour. Compared to the existing surveyed flows, this represents an increase of some 530 and 940 vehicles per hour.
 9. These estimated increases are based upon the centre continuing to generate traffic at less than the RTA Guide rates. They are also based upon the percentage of shoppers walking to the expanded centre continuing to be some 16 per cent, the same as the existing surveyed percentage.
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Distribution and Assignment

10. The report distributes and assigns traffic to the road network based on the majority of traffic coming from/going to the south, south-east and west. Little traffic is expected from the north and north-east. The distribution is based on the Economic Impact Assessment prepared by Pitney Bowes Capital Insight.
11. However, it would be useful to compare the distribution with the existing routes used by shoppers to come to and from the centre. This information could be obtained through shopper interviews.

Traffic Effects

12. The report analyses the traffic level of service for the intersections surrounding the centre. The report found that existing intersections are operating at satisfactory levels of service, except for the Bedwin Road/Unwins Bridge Road/Campbell Road/May Street intersection.
 13. The intersection of Alice Street/Edgeware Road/Llewellyn Street is operating at level of service D, which is a satisfactory level of service for a busy intersection during peak periods. However, queues back from this intersection can affect the operation of the adjacent intersections.
 14. The intersection of Enmore Road/Edgeware Road is noted in the report to also experience delays. However, the report does not analyse the traffic level of service for this intersection. Edgeware Road and these two intersections are north-east of Marrickville Metro
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15. The Bedwin Road/Unwins Bridge Road/Campbell Road/May Street intersection is currently operating at level of service F on Thursday afternoon. This is an unsatisfactory level of service.
 16. With additional traffic from Marrickville Metro and two other developments (Aquatic Centre and Unilever Street), the report analyses the level of service at surrounding intersections to be satisfactory, except for the Edgeware Road/Alice Street/ Llewellyn Street intersection.
 17. Measures including additional lanes and route signage are proposed in the report to improve the level of service at the Unwins Bridge Road/Bedwin Road/May Street/Campbell Street intersection. A roundabout is proposed at the Edinburgh Road/Sydney Street intersection to facilitate access to the centre by shoppers using the left in/left out car park access on Edinburgh Road.
 18. The report proposes to extend parking restrictions on approaches to the Edgeware Road/Alice Street/Llewellyn Street intersection. With the additional development traffic, this intersection will operate with level of service E. This is an unsatisfactory level of service, with queues likely to extend further back into surrounding intersections.
 19. The report does not analyse the operation of the Enmore Road/Edgeware Road intersection, which is currently also experiencing delays. The additional traffic would increase delays and associated queuing.
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Car Park Controls

20. If the centre's car parks are to be controlled (by boomgates) the design of the access driveways should ensure that appropriate lane capacity and queuing areas are provided.

Summary

21. In summary, the main points relating to the TMAP supporting the Part 3A concept plan application for the proposed Marrickville Metro extensions are as follows:
- i) subject to appropriate implementation, the proposed measures relating to public transport, taxis, pedestrians and green travel plan are considered to be appropriate;
 - ii) the proposed parking provision is considered appropriate;
 - iii) there are concerns relating to the traffic analysis;
 - iv) the estimated additional traffic generated by the extensions is based upon the centre continuing to generate traffic at less than RTA Guide rates;
 - v) also based upon the percentage of shoppers walking to the expanded centre continuing to be some 16 per cent, the same as the existing centre;
 - vi) the distribution and assignment of traffic are based on little traffic coming from/to the centre from the north and north-east;
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- vii) it would be useful to compare this distribution with existing routes of shoppers coming to and from the centre;
- viii) this information could be obtained through shopper interviews;
- ix) Edgeware Road and its intersections are north-east of Marrickville Metro;
- x) with additional traffic, the Alice Street/Edgeware Road/Llewellyn Street intersections would operate at an unsatisfactory level of service;
- xi) delays would increase and queues would affect the operation of other intersections;
- xii) the additional traffic would also increase delays and queues at the Enmore Road/Edgeware Road intersection, which was not analysed in the TMAP.