

**Table 1 - Marrickville Metro Shopping Centre – Response to Key Stakeholder/Agency Submissions**

**Marrickville Council**

Key Issues	Points of Concern	Response
<b>Consistency with Planning Policy</b>	The EA makes no reference that Council sought the dSSS to be amended to identify the Metro as 'Stand Alone Shopping Centre' and references to the Metro and the surrounding area as a Village and potential future Town Centre be omitted; and that the final South Subregional Strategy has not yet been released.	At this time, the South Subregional Strategy (SSS) remains as a draft. There is no evidence to suggest that the final adopted version of the SSS will incorporate Council's requests.  The Environmental Assessment (EA) acknowledges that the SSS is a draft policy document.
	The EA does not take into account that the MELS acknowledges the Metro and the area to the immediate south in the general vicinity of the rail line as having potential for conversion to a new centre if adequate public transport access was provided.  Consequently, the EA seeks to separate the Metro's proposed expansion from the dSSS and MELS directions that any expansion should be in the context of the site and the immediate environment becoming a new centre. This approach is unsatisfactory from a land use planning perspective and the expansion of the Metro's footprint may compromise the future status of the centre and strategic planning directions for the area.	The project has been declared a Major Project under Part 3A of the Act and accordingly is being assessed ahead of any potential future directions in respect to the recommendations of the Marrickville Employment Lands Study (MELS).  The Draft Strategy clearly envisages an opportunity for the growth of Marrickville Metro and the surrounding precinct. The redevelopment of the Marrickville Metro site can be the catalyst for change to enable Marrickville Metro and the surrounding precinct to achieve "town centre" status as identified in the draft SSS.
	This potential conflict could be avoided if any expansion of the Metro were to be limited to the existing footprint of the centre notwithstanding the other impacts of the proposal as highlighted in this report.	There is no planning logic to limit the development to the existing footprint, as the proposed expansion is into the adjoining industrial land to the south, away from residential properties. The DSSS identifies the opportunities to change the land use on the adjoining site and the Concept Plan design creates a vibrant and attractive 'place' by creating an activated retail environment in Smidmore Street.

	<p>Marrickville Action Plans for Urban Centres 2009 (Action Plan) The Action plan does not support the expansion of retail floor area over industrial lands.</p> <p>Accordingly, the redevelopment of the Metro via the Part 3A process is pre-empting the orderly resolution of strategic land use issues through the applicable State and local planning strategies. Therefore, it is appropriate that Council in its submission, oppose any expansion of the Metro on adjoining industrial land at 13 – 55 Edinburgh Road, Marrickville until the broader strategic land use issues in the area are resolved.</p>	<p>The Draft Sub-Regional Planning Strategy identifies the opportunities for the land at 13-55 Edinburgh Road. To suggest that a broader strategic land use study is required is simply a basis to delay the development opportunities that are already evident. Furthermore, the proposed expansion will not prejudice the future planning of the area, nor the strategic employment lands located to the south of Edinburgh Road given the site was identified in the draft SSS for broader land uses including employment.</p>
	<p>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</p>	<p>Noted</p>
	<p>The concept design as proposed for the existing centre with large spiral driveways and no sympathetic consideration for the surrounding low density residential development, or potential adverse traffic related issues, warrants a review of the whole scheme. As noted, any expansion of the existing centre should not be of a type that is likely to directly compete with nearby commercial centres.</p>	<p>The spiral driveway to Murray Street/Victoria Road has been deleted along with part of the proposed first floor addition to the centre, therefore retaining the predominant single storey interface to the existing residential areas to the north and north-east of the site. It is proposed to retain the spiral ramp to be located on the corner of Smidmore Street and Edinburgh Road. This feature is located within an industrial context that can support the proposed structure, which is vastly different to the Victoria Road corner.</p> <p>The amended proposal locates the additional built form to the southern portion of the site, away from the residential properties to the north, northeast and west. This is a positive change to the proposed development that will allow the proposal to sit comfortably within the surrounding built form context.</p> <p>The economic impact assessment identifies that the nature of retail proposed will not directly compete with nearby commercial centres and to the extent that this will occur will not jeopardise the viability of these existing centres.</p>
<b>Economic Impact</b>	<p>Council consider that the proposal remains unsatisfactory with regards to its economic effects on surrounding centres. Hill PDA was commissioned by Marrickville Council to undertake an Economic Impact Assessment of the proposed expansion of Marrickville Metro.</p>	<p>The gravity model which has been relied upon by Hill PDA to draw its estimates of impact on the various strip centres around Marrickville has not been explained to an acceptable level, and nor have the workings of the model or the data fed into the model by Hill PDA been made available for examination. The model is a very unreliable basis on which to be drawing such conclusions. Further, Hill PDA's extrapolation as to increases in vacancy rates are not supported by any details or analysis. They are simply subjective views.</p>

	<p>In terms of Economic Impact, the Hill PDA Economic Impact Assessment identifies the following:</p> <ul style="list-style-type: none"> <li>• The impact on Marrickville Road and Illawarra Road will be at 14% reduction in retail sales which is deemed to be a moderate impact. They 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%.</li> <li>• The impact on Enmore is considered moderate at 12%. In all likelihood it is currently trading at least 20% below national average.</li> <li>• The impact on Newtown will be 8% which 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%.</li> <li>• 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.</li> </ul> <p>There are differences in levels of economic impact between the Hill PDA estimate and Pitney Bowes estimated impact. Hill PDA used different methodologies to Pitney Bowes to measure impact. Hill PDA argues that the greatest impact of the expansion will be on centres located in close proximity to Marrickville Metro. The Hill PDA report does not differentiate between demand for strip retail facilities and shopping centre facilities.</p>	<p>The Hill PDA approach has had not given consideration to consumer feedback showing how local residents currently behave in terms of their shopping patterns, the centres that they use, and their expected changes in behaviour following the expansion of Marrickville Metro. The PBBi Economic Impact Assessment took all of this information into account, and presents a logical, transparent reasoning as to why the impacts on the existing strip centres around Marrickville will be much lower than Hill PDA contends.</p> <p>The current state of the strip centres around Marrickville reflects the oversupply of such floorspace. On the other hand, the supply of enclosed shopping centre floorspace is minimal, and it is for this reason that local residents are choosing to visit enclosed shopping centres located outside the Marrickville area for the majority of their discretionary, non-food purchases. The proposed addition at Marrickville Metro would help to redress this shortfall to some degree.</p>
	<p>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.</p>	<p>Refer point above regarding Hill PDA estimates of impact. Hill PDA projections of increased vacancies in these centres are presented without any basis.</p>
	<p>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</p>	<p>Given the nature of the expansion proposed at Marrickville Metro, and the fact that it will meet the aspirations of local residents for the type of shopping which they are currently undertaking outside the Marrickville area, there is no basis for asserting that there will be job losses elsewhere. The impacts on other facilities will be within normally accepted competitive bounds, and will not result in job losses.</p>

	<p>Hill PDA disagrees with Pitney Bowes Insights (PB) main trade area definitions and the divisions between the primary trade areas (PTA) and the secondary trade areas (STA).</p> <p>Hill PDA also argue that Marrickville Metro is likely to only have limited influence in the secondary and tertiary trade area to the east and south east encompassing almost the whole of South Sydney and Botany Bay LGAs, given the travel times and the inconvenience of alternative routes. Hill PDA argues that it is likely that Eastgardens and Bondi Junction is capturing far more expenditure from the Secondary East Trade Area than Marrickville Metro given the better access times and improved convenience. A significant retail space is also planned to service those localities with around 45,000m<sup>2</sup> in the Green Square Town Centre (including Gazcorp and the Choker site), 5,000m<sup>2</sup> for Erskineville Ashmore Estate and in other centres such as Victoria Park. Therefore, Hill PDA argues that the benefit of population and expenditure growth in the eastern STA and tertiary trade areas (TTA) will be captured mainly by the proposed centres at Green Square and Erskineville Ashmore Precinct, rather than Marrickville Metro.</p> <p>Hill PDA state that the PB report market share calculation does not clearly indicate how the total sales that are generated from each trade sector are calculated. Hill PDA argues the same limitations apply to the interpretation of the forecasted market share breakdown.</p>	<p>An improvement to Marrickville Metro is necessary both so that the centre can better meet the needs of local residents (refer points above) and also so that the centre can continue to compete effectively with facilities such as Broadway, Eastgardens, Bondi Junction and new facilities planned at Green Square. The expanded Marrickville Metro will not attract the majority, or even a high share of available expenditure from the secondary and tertiary trade area sectors to its east and south-east – the centre's projected market share from its secondary east sector, for example, is 9.6% (i.e. more than 90% of the available expenditure from that sector will go to other facilities) while from the tertiary east sector the projected market share is 3.0% and from the tertiary south east sector it is 1.2%.</p> <p>It is important, however, that Marrickville Metro be allowed to improve its offer, as all shopping and activity centres must do over time if they are to remain relevant to their customers and to compete effectively with the increasingly competitive environment which they face, which Hill PDA has noted will occur in this case.</p>
	<p>The proposed expansion of the Marrickville Metro conflicts with the Marrickville Urban Strategy to the extent that it will redirect expenditure away from the existing centres around the train stations to the “standalone shopping centre”.</p>	<p>Refer points above. PBBI disagrees with the Hill PDA estimates of impacts on existing centres for reasons detailed above.</p>
	<p>Whilst the proposed expansion of the Marrickville Metro does not undermine objectives 2 to 6 of the NSW draft Centres Policy. In relation to principal 4, Hill PDA states that for the DA, given the impacts of the proposed development, the planning system should regulate the location and scale of the proposal.</p>	<p>Refer to points above regarding Hill PDA projected impacts.</p>
<b>Traffic and Transport</b>	<p>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.</p>	<p>Noted.</p>

	<p>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.</p>	Noted.
	<p>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).</p>	Noted.
	<p>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.</p>	<p>The concept is to encourage pedestrians to move between the main shopping centre and the Edinburgh Road site. It is not considered likely that cars will move between the car parks. Shoppers will go directly to the preferred car park and "full" or "vacant" spaces signs at the entrances will advise drivers if a particular car park was full.</p> <p>In any case, the 'split site' development has arisen owing to Council's decision not to allow the inclusion of Smidmore Street in the proposed development. Nevertheless, the sites are still contiguous and allow for easy connection between the two parts via a pedestrian crossing which is no different to any Main Street Retail design.</p>
	<p>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.</p>	Not true. A median in Smidmore Street will achieve this.
	<p>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.</p>	Noted.

	<p>Transport and Urban Planning has reviewed the additional information by Halcrow regarding the traffic assignment and 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.</p>	<p>For the reasons explained in detail in the Preferred Project Report this would not be the case.</p> <p>The assumed traffic distribution was reviewed by the RTA after requesting further information and it has now not indicated any further concern with this. In summary the reasons why this is not true are:</p> <ul style="list-style-type: none"> <li>• There is no right turn from Edgeware Road into Enmore Road so vehicles will not return to the north this way,</li> <li>• Right turns from Edgeware Road into Victoria Road are very awkward due to the proximity of Victoria Road to Llewellyn Street and this movement would become even less attractive if more traffic was drawn to it so drivers with a choice would tend to use other roads,</li> <li>• Alice Street would potentially serve traffic from the secondary east part of the catchment. However Erskineville provides a significant barrier to access to Alice Street from the east. Traffic from the north east would have more direct access via Enmore Road and traffic from the south east via May Street, and</li> <li>• As outlined in detail in the Preferred Project Report, much of the new traffic that would access the centre via an Edgeware Road route would be offset by intercepted traffic that would otherwise use Edgeware Road to shop elsewhere.</li> </ul> <p>Some very minor inconsistencies were found in the traffic forecasts for the Thursday evening. Corrected forecasts are provided in <b>Appendix 5</b> (as compared to the traffic forecasts in Appendix C of the Traffic Report prepared by Halcrow submitted with the PPR). Forecast intersection levels of service are unchanged as are conclusions based on these.</p>
	<p>Based on the above the traffic impacts at the Edgeware Road / Alice Street / Llewellyn Street and Edgeware Road / Victoria Road intersection would be higher (i.e. 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.</p>	<p>As indicated above and in <b>Appendix 5</b> (as compared to the traffic forecasts in the initial Appendix C of the Traffic Report prepared by Halcrow submitted with the PPR) this would not be the case.</p>
	<p>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.</p>	<p>It is acknowledged that at present some traffic uses Lord Street to travel to Marrickville Metro. Any further traffic that might use this route would do so instead of using Alice Street or May Street to travel from the Princes Highway. As indicated above, only a small amount of additional traffic is expected to use Alice Street. As per the Preferred Project Report, 30 and 51 additional vehicles per hour on a Thursday evening and on a Saturday respectively are expected to arrive along May Street. Of these, at the most 6 to 10 vehicles per hour might instead use Lord Street. These numbers are low but potentially the centre could be asked to make a contribution in respect of this traffic pro rata to the hourly traffic volumes that Lord Street presently carries at these times.</p>

	<p>Ultimately higher use of Edgware Road and Alice Street due to the expanded shopping centre will require additional parking restrictions to be considered and implemented at Edgware 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.</p>	<p>As indicated in the Preferred Project Report, there would only be a need for a half hour extension of the existing parking restrictions on Alice Street and this would only affect 8 spaces.</p>
	<p>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 patrons to cross Smidmore Street.</p>	<p>The proposed bus stop on Smidmore Street is proposed to be used for a community bus.</p> <p>It is strongly disputed that the new interchange in Edinburgh Road (now that Smidmore Street is to remain open) is less convenient for bus patrons. The new bus interchange will be of a modern design with a direct entrance into the centre. It will be significantly better than the existing ad hoc arrangement.</p>
	<p>It is now proposed to relocate the taxi rank (capacity of 6 vehicles) to the southern side of Smidmore Street.</p>	<p>Noted.</p>
	<p>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.</p>	<p>The proposed bicycle parking provision is in line with the TMAP produced for the centre.</p> <p>There are times when the timing of the provision of bicycle parking spaces can be over-regulated. It is in the centre's own interest not to have bicycles cluttering up walkways or other areas but rather to cater properly and efficiently for customer needs. Arbitrary timing for this is not appropriate.</p> <p>Bicycle parking will be provided wholly within the site.</p>
	<p>The proposed parking provision of 1,628 car parking spaces is consistent with RTA Guidelines. Further clarification is required if the motorbike parking previously proposed, is included in the Preferred Project.</p>	<p>Noted.</p> <p>Motorcycle parking will be provided in the same proportion as originally proposed.</p>
	<p>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.</p>	<p>This has not been provided as this loading area has been used successfully for many years and loading manoeuvres are not proposed to change.</p>

	<p>The swept path analysis shows that kerb and (some) boundary adjustments will be required at the intersection of</p> <ul style="list-style-type: none"> <li>• Murray Street / Edinburgh Road</li> <li>• Murray Street / Smidmore Street</li> <li>• Smidmore Street / Edinburgh Road as well as changes to the traffic signals</li> <li>• Edinburgh Road / Sydney Steel Road associated with the roundabout and other works</li> </ul> <p>The proposed changes to the Smidmore Street / Edinburgh Road traffic signals will require approval by the RTA.</p>	<p>Noted. Exact changes will be agreed with the relevant authority in the detailed design process.</p>
	<p>Pedestrian facilities proposed include:</p> <ul style="list-style-type: none"> <li>• Raised pedestrian crossing and kerb blisters for new crossing in Smidmore Street</li> <li>• Kerb blisters at the existing pedestrian crossing in Murray Street north of Smidmore Street</li> </ul> <p>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.</p> <p>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.</p>	<p>It is noted that the Smidmore Street crossing will be much busier than the Murray Street crossing. Given, there is not anticipated to be a significant increase in pedestrian traffic along Murray Street there is not considered to be a need for a raised pedestrian crossing on Murray Street. Furthermore, the introduction of a new raised pedestrian crossing at Murray St is likely to cause further build up of flood waters upstream and potentially impact upon the properties on the eastern side of Murray Street.</p> <p>The spread of pedestrians onto routes to and from the centre means that the number of pedestrians on any one route would be relatively low. From an inspection, side walks into the area are not anywhere near capacity and all operate at a Level of Service A. They would remain at Level of Service A or B with the extra pedestrian traffic added. Given the surrounding footpaths will continue to operate at a satisfactory level with the extra pedestrian traffic, conducting counts and analysis would be doing so just for the sake of it, without any real benefit.</p>
	<p>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.</p> <p>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.</p>	<p>All kerbside controls will need to be approved by the Marrickville Local Traffic Committee.</p>



	<p>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.</p>	Noted.
	<p>In summary Transport and Urban Planning considers that the preferred project which recommends a split site development will result in:</p> <ul style="list-style-type: none"> <li>• Higher levels of pedestrian vehicle conflict in Smidmore Street;</li> <li>• Increased around the block traffic movements associated with movements between the car parks;</li> <li>• Enforcement issues with respect to the proposed No Right Turn at the Smidmore Street car park entry;</li> <li>• A bus interchange location that is less convenient for the majority of shoppers, than the existing interchange.</li> </ul> <p>With regard to the transport assessment Transport and Urban Planning considers that there are still issues / questions with regard to:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Proposed level of bicycle parking for the development;</li> <li>• Inadequate information on pedestrian movements in and around the proposed development.</li> </ul>	<p>This is the primary basis of the design. Smidmore Street will become an active, pedestrian friendly street rather than a somewhat hostile industrial type street.</p> <p>Significant movement between car parks is unlikely. Shoppers will go directly to the preferred car park and "full" or "vacant" spaces signs at the entrances will advise drivers if a particular car park is full.</p> <p>A median strip in Smidmore Street will prevent No Right Turns at the Smidmore Street car park entry.</p> <p>It is considered that the new interchange in Edinburgh Road (now that Smidmore Street is to remain open) is less convenient for bus patrons. The new bus interchange will be of a modern design with a direct entrance into the centre. It will be significantly better than the existing ad hoc arrangement.</p> <p>The analysis outlined in the Halcrow Report documents the increased projected traffic generated by the development and explains why this increase can be accommodated by the existing intersections in the area.</p> <p>The proposed level of bicycle parking for the development is considered to be appropriate.</p> <p>Given the surrounding footpaths will continue to operate at a satisfactory level with the extra pedestrian traffic, conducting counts and analysis would be doing so just for the sake of it.</p>
<b>Consent Authority</b>	Council request that the application be considered by the Planning Assessment Committee (PAC).	This is a matter for the Minister of Planning.

<b>Voluntary Planning Agreement</b>	<p>Council notes that the revised scheme does not incorporate a voluntary planning agreement (VPA). Given, that the development remains substantially the same, the proponent should provide community benefits via a VPA, equivalent to those previously proposed, on a pro rata basis commiserate with the revised scale of development.</p>	<p>The draft VPA was prepared as part of the original Environmental Assessment in order to facilitate the inclusion of Smidmore Street in the development project. The resolution of Marrickville Council in September 2010 not to close and sell the road to AMPCI has meant that Smidmore Street is no longer part of the development project and the need for a VPA is essentially redundant. Instead of a VPA as outlined in the PPR, the proponent has included a Statement of Commitment for the payment of monetary contributions in accordance with Council's section 94 Plan.</p> <p>In addition to this commitment, building on the suggestions of Council and the potential opportunities identified by PBBI, AMPCI is prepared to enter into a voluntary arrangement with Council to support the upgrade of the nearby retail strips. The arrangement will need to be resolved in further detail with Council's Economic Development Manager. One of the options available is to participate in a new initiative of Council being the establishment of an Economic Development Forum and to fund studies/programs that arise from this forum.</p>
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## Marrickville Metro Shopping Centre – Response to Agency Submissions

### Transport NSW

Key Issues	Points of Concern	Response
Traffic	Pedestrian crossing between the two retail entrances and traffic calming measures may result in delays for buses on Smidmore Street accessing the proposed new bus facility on Edinburgh Road.	This is no longer a concern, as a slight variation on the STA bus route preferred Option 1 is proposed to be adopted. Nevertheless, it is proposed to define a definite road and pedestrian crossing of the road in Smidmore Street.
	Request further discussions with TNSW, STA and RTA regarding delays and bus circulation issues occur prior to further consideration of proposal by DoP.	As the STA's preferred option of not having to turn around via Smidmore Street through the centre is proposed this consultation is no longer necessary.
	Public domain improvements should delineate between the road and public footpath.	It is proposed to improve both road carriageway and public footpath parts of the public domain.
	Bus terminus on Edinburgh Street should have adequate surveillance and lighting given the new location is at the back of a shopping centre and the new terminus includes a shopping trolley collection point.	This is proposed.
	Consider bus set down point on Murray Street near Smidmore Road.	This will no longer be required if a slight variation of STA Option 1 (which is there preferred solution) is implemented.
	TNSW would support a further reduction in car parking rates. Preparation of the Green Travel Plan and Travel Access Guide could aid in further reduction of parking provision. TNSW request mechanisms be adopted to help minimise the number of people driving to the site and using the parking facilities all day.	The rate of car parking provision proposed is below that of the Marrickville DCP and of that presently supplied on site but accords with RTA requirements. This provision was seen to be an appropriate balance between the need to minimise car parking and the legitimate concerns of nearby residents that shopping centre parking not overspill onto their streets.
	Preparation of a Green Travel Plan and Travel Access Guide.	The proponent agrees to provide a Green Travel Plan for the shopping centre. This is a Statement of Commitment.
	Improvements to pedestrian accessibility along Edinburgh Road east of Sydney Steel Road and Edgeware Road south east of Smidmore Road have not been addressed. TNSW requests consideration of the following improvements to pedestrian accessibility: <ul style="list-style-type: none"> <li>A new pedestrian refuge crossing at the intersection of Sydney Steel Road/Edinburgh Road; and</li> <li>A new pedestrian refuge across Edgeware Road south near Smidmore Road leading to Sydenham Station and St Peters Station respectively.</li> </ul>	The first refuge is proposed to be incorporated in the roundabout at the intersection. The applicant is agreeable to providing a refuge in Edgeware Road subject to agreement with the Local Traffic Committee on the location and design.

	The construction traffic and parking management plan, as listed in SoC should mitigate potential impacts to accessibility, amenity and safety of public transport use, walking and cycling during construction. Access arrangements for emergency vehicles and workers and an estimation of the number of truck movements expected during the construction phase should be included.	Noted and agreed.
	TNSW requests that consultation with STA to ensure buses are able to adequately manoeuvre and negotiate turns and roundabouts along routes.	Noted and agreed.

## Marrickville Metro Shopping Centre – Response to Agency Submissions

### Sydney Water

Key Issues	Points of Concern	Response
	The Preferred Project Report addresses Sydney Water concerns. However, the developer will need to engage with the Sydney Water's Stormwater Team to finalise the designs and plans for the necessary works.	Noted.
	Sydney Water will further assess the impact of individual developments when the proponent applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess if amplification and/or changes to the system are applicable. Sydney Water requests the Department of Planning to continue to instruct proponents to obtain a Section 73 Certificate from Sydney Water.	Addressed in revised Statement of Commitments.

## Marrickville Metro Shopping Centre – Response to Agency Submissions

### State Transit Authority

Key Issues	Points of Concern	Response
<b>State Transit Preferred Operations. Option 1 – All bus operations in Edinburgh Road</b>	<p>State Transit suggest the following changes:</p> <ul style="list-style-type: none"> <li>Reconstruct the roundabout at Murray Street and Edinburgh Road to enable buses to perform a u-turn and proceed with the initial roundabout design at Edinburgh Road and Sydney Steel Street (that also allows buses to perform a u-turn) to contain all bus operations on Edinburgh Road. The roundabout should also allow for low floor buses.</li> <li>This option would allow either council and/or the proponent to consider further pedestrian amenity or activation on Smidmore Street with no impact on bus operations.</li> </ul> <p>State Transit prefer this option.</p>	<p>It is proposed to adopt a slight variation to STA's improvement Option 1 (which is their preferred solution), which involves construction of roundabouts at the intersection of Sydney Steel Road with Edinburgh Road and Railway Parade with Edinburgh Road which would allow buses to u-turn instead of loop around the block via Smidmore Street. Available land at the expanded Railway Parade roundabout would allow a roundabout large enough for 14.5m buses to turn around. Refer to Drawing 210026 SK 010 B dated May 11 prepared by Cardno and included with this submission, which details the proposed roundabout solution for buses.</p>
<b>Option 2 – Retention of Services in Smidmore Street</b>	<p>Alternatively, State Transit suggest the following changes:</p> <ul style="list-style-type: none"> <li>Redesign the intersection of alignment at Smidmore Street and Edinburgh Road. Redesigning the intersection alignment would remove the requirement for buses and/or large vehicles to lane share when making the left turn and would reduce the circulation time for buses discharging from Smidmore Street and improve general traffic movements.</li> <li>Provide a bus stop on the southern side of Smidmore Street. The provision of a bus stop in this vicinity of the pedestrian signals would better serve the local patrons by reducing the travel time on a bus and provide a central location for passengers to be set down.</li> <li>Reconstruct the Murray Street and Edinburgh roundabout to allow low floor buses to access Smidmore Street.</li> <li>Pedestrian signals in Smidmore Street are recommended if bus services use Smidmore Street to improve safety and reduce impact on bus services.</li> </ul>	<p>The STA concerns are noted. The STA noted that the proposed design of the Smidmore Street / Edinburgh Road intersection would require buses to exit Smidmore Street from the right turn lane when turning left. This should no longer be a concern as it is proposed to adopt a slight variation of the STA's preferred solution, Option 1 (see comments above).</p>

## Marrickville Metro Shopping Centre – Response to Agency Submissions

### Chamber of Commerce

Key Issues	Points of Concern	Response
<b>Economic</b>	The purported amount of trade that the Proposal will attract from the King Street, Newtown precinct is overestimated in order to reduce impact on Marrickville.	Pitney Bowes Business Insight estimates, in the Economic Impact Assessment, that the likely impacts would be modest on both King Street Newtown and the Marrickville strip centre. The analysis of customer behaviour throughout the Marrickville region, as detailed in the PBBI EIA, showed that the King Street Newtown centre was used to a far greater degree than the Marrickville centre for the purchase of clothes, homewares and gifts, being the types of goods which would be the focus of the additional retailing that would be added to the expanded Marrickville Metro. The PBBI assessment reflects an understanding of and appreciation for the importance of customer behaviour – by contrast, the Hill PDA deterministic gravity model has no such regard.
	The proposal will substantially impact the traditional food retail / general retail in the Marrickville Business Centre; rather than the eclectic retail / live entertainment of King Street, Newtown.	See response immediately above. There is greater similarity in offer between King Street Newtown and the proposed expanded Marrickville Metro, than between the Marrickville Business Centre and the expanded Marrickville Metro. There is also a much greater difference in orientation in the food retail/general retail offer of the Marrickville Business Centre, with its particular focus on the Vietnamese community, and to a lesser extent the Greek community, and either the existing Marrickville Metro or the proposed centre post expansion.
	The AMP studies indicate a generally even distribution of economic impact over Newtown and Marrickville. The proposal will have unacceptable economic impacts to Marrickville and Illawarra Roads retail and business areas. The impact to Newtown will be less due its unique character. AMP's consultants have failed to take into account and address the nature of Marrickville and Newtown and other qualitative issues.	Refer points above. The proposal will not have unacceptable economic impacts to either the Marrickville Road or Illawarra Road strips. The assessment presented in the PBBI EIA has regard for the fact that customer surveys throughout the Marrickville area have shown that the Newtown centre is used as the main destination for clothes, homewares and gifts shopping by 11% of those interviewed (Marrickville Metro is the main destination for 21%) while the Marrickville Road shops are used as the main destination for such shopping by <u>only 2%</u> of all those interviewed. AMP's consultants (PBBI) have in fact very much taken into account the respective natures of Marrickville and Newtown, and the relevant qualitative issues, in presenting estimates of anticipated impacts. By contrast, these important factors have <u>not</u> been taken into account in the deterministic, gravity model driven calculations presented on behalf of the Marrickville Chamber of Commerce and Marrickville Council by Hill PDA.
<b>Traffic</b>	Clarification is required regarding the assumed traffic distributions as there appear to be inconsistencies between the reported additional traffic flows and those included within the SIDRA Intersection modelling.	Some very minor inconsistencies were found in the traffic forecasts for the Thursday evening. Corrected forecasts are provided in <b>Appendix 5</b> (as compared to the traffic forecasts in Appendix C of the Traffic Report prepared by Halcrow submitted with the PPR). Forecast intersection levels of service are unchanged as are conclusions based on these.

Consideration needs to be given to background traffic growth which will impact on the performance of the surrounding road network, to establish whether additional works are required to ensure satisfactory performance is achieved both now and into the future.	Marrickville is a mature area and accordingly traffic conditions are stable. To the extent that the proposed development contains Marrickville traffic in Marrickville (as per good land use – transport planning) it will be beneficial for the regional road system. Similarly, Marrickville Council itself is promoting green transport initiatives that will serve to counter any background traffic growth that may occur.												
There is no justification that the majority of the increased delays and required improvements at the intersection of Edgeware/Alice Street/Llewlyn Street are a result of the additional traffic associated with these other approved developments.	<p>As per the Preferred Project Report the relatively contributors to traffic growth forecast for the intersection form different sources are as follows.</p> <table><tr><th></th><th>Thursday PM</th><th>Saturday</th><th>Combined Proportion</th></tr><tr><td>Marrickville Metro</td><td>16</td><td>29</td><td>25%</td></tr><tr><td>Other Developments</td><td>69</td><td>69</td><td>75%</td></tr></table> <p>From this is apparent that Marrickville Metro would be responsible for only a minor proportion of the need to upgrade the intersection.</p>		Thursday PM	Saturday	Combined Proportion	Marrickville Metro	16	29	25%	Other Developments	69	69	75%
	Thursday PM	Saturday	Combined Proportion										
Marrickville Metro	16	29	25%										
Other Developments	69	69	75%										
Consideration should be given to the reduced amenity of residents associated with the proposed loss of car parking arising from improvements that are required to ameliorate the traffic impacts arising from the subject development.	As indicated above the analysis indicates that there will only be a need to extend existing parking controls by half an hour and that only 8 spaces would be affected. This impact would be very small compared to the planning benefits of providing a significant number of jobs locally and better containing Marrickville shopping traffic in Marrickville.												
The pedestrian shared zone raises safety issues and will result in traffic congestion. A shared zone is subject to the approvals of the RTA and the Local Traffic Committee.	A pedestrian shared zone in Smidmore Street has been expressed as being part of a long term vision for Smidmore Street. However, this will not be possible unless Smidmore Street is closed and Marrickville Council will not agree to that at present. Accordingly, Smidmore Street will remain open as a normal public road with a raised pedestrian crossing to connect the two parts of the centre.												
<p>To the south and east, the area is constrained by railway lines with limited opportunities by way of overpasses for traffic to leave the area – causing further congestion.</p> <p>The Metro is already set within a constrained early-mid 20<sup>th</sup> century residential area with small roads and restricted distribution and feeder roads. The substantial increase in the floor area will create unacceptable traffic congestion and conditions in the area.</p>	The application traffic report clearly demonstrates that the local road system will be able to accommodate the additional traffic that will be generated. The RTA has reviewed this and expressed no concerns in principle.												
Strategic public transport and / or road planning may not have planned for expansion of the centre.	The centre is fortunate in having three bus routes that actually terminate at it. In addition a number of other bus routes are located within easy walking distance across a park on Enmore Road. None of Transport NSW, Sydney Buses or the RTA have raised strategic concerns.												



	Development comprises overdevelopment on parking grounds because it would use the majority of remaining road capacity for a single development.	This argument ignores the fact that the level of retail development sought is less than the total market requirement for more retail space in the area. The subject location is well suited to this because it is within a largely industrial area in which there is minimal industrial traffic activity during peak shopping times on weekends. Given the need for additional retail space in Marrickville it is difficult to imagine a more appropriate place for such development in it in terms of its traffic effects.
<b>Equity</b>	The public policy / equity implications of this site claiming the available road capacity in the region, when no account is taken of growth in background traffic needs to be considered.	As indicated above, little background traffic growth is likely in the area. In addition refocussing of traffic into this area will afford relief to other areas. This is in accordance with good transport planning practice of reducing journey lengths (vehicle kilometres travelled).
<b>Parking</b>	Consideration of reduced parking supply is considered appropriate to achieve a more sustainable transport planning outcome, with increased reliance on alternate travel modes rather than promoting a 'car dependent' centre. The increased burden that this places on public transport needs to be further considered.	As indicated above the proposed parking provision represents a balance between resident's needs and the need to encourage non-car modes of transport.

## Marrickville Metro Shopping Centre – Response to Agency Submissions

### RTA

Key Issues	Points of Concern	Response
<b>Intersection of Unwins Bridge Road/Bedwin Road/May Street/Campbell Street</b>	<p>The RTA grants 'in principle' approval to the proposed modifications of the traffic signals at this intersection subject to:</p> <ul style="list-style-type: none"> <li>extending the right turn bay on May Street to a minimum length of 70 metres and the right turn bay on Unwins Bridge Road for a minimum of 30 metres. This may require the removal of some existing car parking spaces on the southern side of May Street and the northern side of Unwins Bridge Road to accommodate the lengthening of the right turn bays.</li> <li>the phasing arrangement shall be amended to incorporate a diamond overlap phase for the proposed right turn movements on May Street and Unwins Bridge Road.</li> <li>the removal of more car parking spaces will require consultation by Council with residents and business owners through the Local Traffic Committee.</li> <li>The proposed modifications to the existing traffic signals and civil works shall be designed to meet RTA's requirements and endorsed by a suitably qualified practitioner. The design requirements shall be in accordance with the RTA's Road Design Guide and other Australian Codes of Practice. The certified copies of the traffic signal design plans shall be submitted to the RTA for consideration and approval prior to the release of the Construction Certificate and the commencement of road works. The RTA fees for administration, plan checking, signal works inspections and project management shall be paid prior to the commencement of works.</li> <li>Entering into a 'Works Authorisation Deed' for the abovementioned works. The RTA will provide a final consent for each specific change to the State road network prior to the commencement of any work.</li> <li>The Occupation Certificate shall not be released for any stage of the development until such time that all the above mentioned signal and civil works are fully constructed and operational.</li> <li>The developer shall be responsible for all public utility adjustments/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents.</li> <li>All works/regulatory signposting associated with the proposed development are to be at no cost to the RTA.</li> </ul>	<p>In principle approval of this is acknowledged.</p> <p>It is noted that the RTA submission suggests that further parking restrictions may be required on the south side of May Street. The design was deliberately modified so that parking outside residences on the south side of May St need not be affected. In this regard, consultation will be needed between the applicant, the RTA and Marrickville Council to determine whether it is the RTA's objective to just mitigate the effects of the proposed development or to go further and improve the existing operation, albeit at the cost of kerbside parking.</p> <p>Notwithstanding this, it is noted that, as for the first section of May Street, lengthening of the right turn bay could be achieved by taking parking from the northern rather than the southern side of May Street.</p>
<b>Advisory comments</b>	<p>The State Transit Authority (STA) and the Department of Transport shall be consulted for the proposed additional bus services and bus stops. This consultation shall be to the satisfaction of the Department of Planning and Infrastructure.</p>	<p>Noted.</p>

	The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1 - 2004 and AS 2890 2002.	Noted.
	Consideration should be given to install speed humps at regular intervals with the car park to improve safety.	Noted.
	The proposed turning areas within the car park are to be kept clear of any obstacles, including parked cars, at all times.	Noted.
	The internal aisle ways are to be marked with pavement arrows to direct traffic movements in / out of the site and guide traffic circulation through the car park.	Noted.
	The minimum available headroom clearance is to be signposted at all entrances and clearance is to be a minimum of 2.2 metres (for cars and light vans, including all travel paths to and from parking spaces for people with disabilities) measured to the lowest projection of the roof (fire sprinkler, lighting, sign and ventilation), in accordance with AS 2890.1 - 2004.	Noted.
	Disabled parking spaces should be clearly marked and located adjacent to lifts.	Noted.
	The swept path of the longest vehicle (including garbage trucks) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS.	Noted.
	All vehicles are to enter and leave the site in a forward direction.	Noted.
	All vehicles should be wholly contained on site before being required to stop.	Noted.
	All loading and unloading shall occur on site.	Noted.
	A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council, for approval, prior to the issue of a construction certificate.	Noted.
	All demolition and construction vehicles are to be contained wholly within the site.	This is an impractical requirement that cannot be achieved. Loading zone areas will be detailed in the CMP.
	The required sight lines to pedestrians or other vehicles in or around the car park or entrances should not be compromised by landscaping, signage, fencing or display materials. In addition, measures should be implemented to improve visibility to pedestrians and other vehicles where sight distance is restricted.	Noted.

	<p>Clear sight lines shall be provided at the property boundary line to ensure adequate visibility between vehicles leaving the car park and pedestrians along the frontage road footpath in accordance with Figure 3.3 of AS 2890.1 - 2004 for light vehicles and AS 2890.2 - 2002 for heavy vehicles.</p>	<p>Noted</p>
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