



Mr Michael Woodland
Director Metro and Regional Projects South
Department Planning and Infrastructure
23-33 Bridge St
Sydney NSW 2000
19th August 2011

RE: MP10_0155 - Redevelopment of the Former Allied Mills Site for the purposes of a Mixed Use Residential, Commercial and Retail development

Thank you for accepting this late submission on the exhibited Concept Plans for this development.

As the local bushcare organisation since 1999, the Inner West Environment Group (IWEg) is comprised of local residents committed to establishing a bush corridor along the railway corridor, and working closely with the local community, Councils, and business towards this goal. IWEg has established and maintained six bushcare sites and at least 20 more are planned. From 2000 to 2011, we contributed more than 15,000 hours by volunteers and paid contractor labour, to re-establishing and maintaining bushcare sites along the GreenWay corridor.

We wish to raise strong objections to the development of the former Allied Mills site, as it is currently proposed and exhibited. Detailed points are presented below under topic headings, supported by **Figure 1** showing our recommended changes to the concept to maximise outcomes for the GreenWay and biodiversity.

Background

- “Greening the Grey spots” urban renewal for the downstream section of Hawthorne Canal corridor commenced in late 1980s/early 1990s, including volunteer bushcare work at Cadigal Reserve, Summer Hill.
- Cooks River to Iron Cove GreenWay concept initiated in late 1990s, in-principle support 2002, MGP Coordination Strategy 2007, Environmental Trust Urban Sustainability project 2008, exhibited and agreed *Cooks River to Iron Cove GreenWay Master Plan and Coordination Strategy*, October 2009 (MCS),
- The Inner West Environment Group established in 1999, has been instrumental in establishing and maintaining bushcare sites along the rail corridor. The subject development site is critical in providing contiguous habitat and bush corridor. See more at www.iweg.org.au
- Friends of the GreenWay was established in October 2007, and now has over 150 supporters engaged in a number of activities in the community. Refer www.friendsofthegreenway.org.au (this paragraph should precede the paragraph above)
- representatives from Friends of the GreenWay met with proponent in 2008 and 2009, and asked proponent to include significant bushcare areas and appropriate

buffers within the site. We expressed our desire to see the area now proposed for 10-storey apartments, to be used to develop a bushcare site and provided the proponent with some early concept drawings for the GreenWay;.

- RTA report *Strategic Concepts for a Cooks River to Iron Cove Shared Path – towards a GreenWay Trail for the Metro Sydney Strategic Cycle Network* (The Environment Works Pty Ltd February, 2010) examined a number of path options.
- Exhibited and approved GreenWay Trail concepts by NSWTI as part of Inner West Light Rail extension (refer <http://www.transport.nsw.gov.au/rail/lightrail-extension.html>). Current NSW State Government budget 2011-2012 appears set to exclude/defer GreenWay Trail from the Inner West light rail extension works.

Director General's Requirements

- These have concentrated on the more legalistic aspects of Threatened Populations etc. rather than addressing ways the development can be designed to maximise the greenway biodiversity vision as contained in the GreenWay MCS, and support for the community's work to establish a wildlife and bush corridor and contiguous habitat.
- *The Greenway MCS and Strategic Concepts* report should have been included as **key reference documents** at Attachment 1 of DG requirements, rather than just the "Greenway Group" Design Principles - which had not been publicly exhibited, and were prepared over a short time frame with limited stakeholders. This compares with DG requirements for the Lewisham Towers which required the proponent to refer to the GCSM.
- An objective in the GreenWay MCS of expanding the number and extent of bushcare sites would be to "...ensure that over time, there is a continuity of sites and canopy cover established along the length of the corridor, and with any gaps in a thick grassy and shrubby understorey being limited to less than 20 metres to ensure small birds can migrate and forage along the corridor." (MCS, Oct 2009).
- The "GreenWay Groups" design principles which form one of the key documents for referral, appear to have misunderstood or misapplied the concept of developments "addressing" the greenway. This appears to have been re-interpreted in a strict town planning/ transport planning sense, not recognising the key aspect of biodiversity. Nor does it consider the impacts of access, lighting, integrity and disturbance for bushcare sites and habitat caused when hardened and high-use urban development interfaces bush habitat. This unfortunately may have guided the proponents to develop a concept that although making sense in terms of pedestrian access and movement, development outcomes and car parking and access, is contrary to common-sense principles in creating a viable habitat corridor and also the community-agreed biodiversity outcomes for the corridor.

The Proponent's Concept and Assessment

- The proponent has focussed assessment of GreenWay-related issues almost entirely on pedestrian and cycling access and in creating "busy spaces" rather than responding to the challenges of urban renewal and improving biodiversity;
- The concept lacks credibility and detail in regard site biodiversity, landscaping and habitat development. Typical examples and cross sections of approaches to maximise biodiversity and habitat on the subject site and complementing the greenway corridor should have been provided to demonstrate the proponent's understanding of the issues and willingness/expertise to address the challenges faced in developing the site as well as building biodiversity and habitat, and how this development can be done to minimise impact on fauna, rather than reducing it as appears to be the case;

- The planned internal roads and access are exactly in the position to result in maximum impact on biodiversity – particularly as this results in the Greenway Trail being sited in the rail corridor through the middle of potential bushcare sites;
- There is a “legalistic” approach to assessment of ecology and biodiversity, and limited or no assessment of the potential of the development to improve the level of biodiversity or habitat and how it can add to the greenway vision of a wildlife corridor;
- Figure 4 of the Hassall concept plan, “*active edges addresses the green corridor*” – this is actually the opposite that is desirable for habitat and fauna. New internal roads have no positive impact on greenway unless the GreenWay Trail is placed there and rest of rail corridor can be used for bushcare sites.

Recommended Changes to Concept to achieve better GreenWay, community and environmental outcomes – refer *Figure 1*

- new internal road at southern end of site from Edward St to terminate 50m north of Old Canterbury Rd. GreenWay Trail to connect to path linking to cnr Edward St and Old Canterbury Rd. Bushcare site extended along existing Old Canterbury Rd embankment and road reserve
- convert road alongside northern tower buildings to shared zone/Greenway Trail, with building vehicle access via southern end of the buildings not midway along. Thus GreenWay Trail is placed on the proponent's site as part of a 10kph shared zone alongside the buildings, rather than the Trail passing through the centre of and fragmenting potential greenway bush corridor area. This would provide greater integrity and less fragmentation or “edge effect” for bush establishment/habitat areas;
- provide ramp up from northern end of site to meet footpath Longport St to provide access to refuge and Cadigal Reserve;
- provide one of the concrete silo towers for water treatment, verticals vegetable gardens, provide composting and rooftop garden areas for residents;
- provide GreenWay drop-in and education centre as part of community facilities and provide storage facilities on the site for bushcare volunteers;
- path and roadway lighting shielded from bush corridor areas and provide appropriate “green” fencing/barriers to protect bushcare areas from dogs/people trampling across the sites;
- provide dense bush/shrubs and grassed habitat area E-W though site as a haven for small birds rather than all parkland setting which will allow domination of area by aggressive and dominant noisy miners.
- Appropriate plant selection which uses local provenance species and accords with bush corridor objectives that IWEG has been working toward (refer www.iweg.org.au) .

We strongly recommend that you reject this Concept Plan for re-development of a site with so much biodiversity and habitat potential. Representatives of the Inner West Environment Group would be happy to meet with the Department to further discuss aspects of the proposal and our submission.

Bruce Ashley, on behalf
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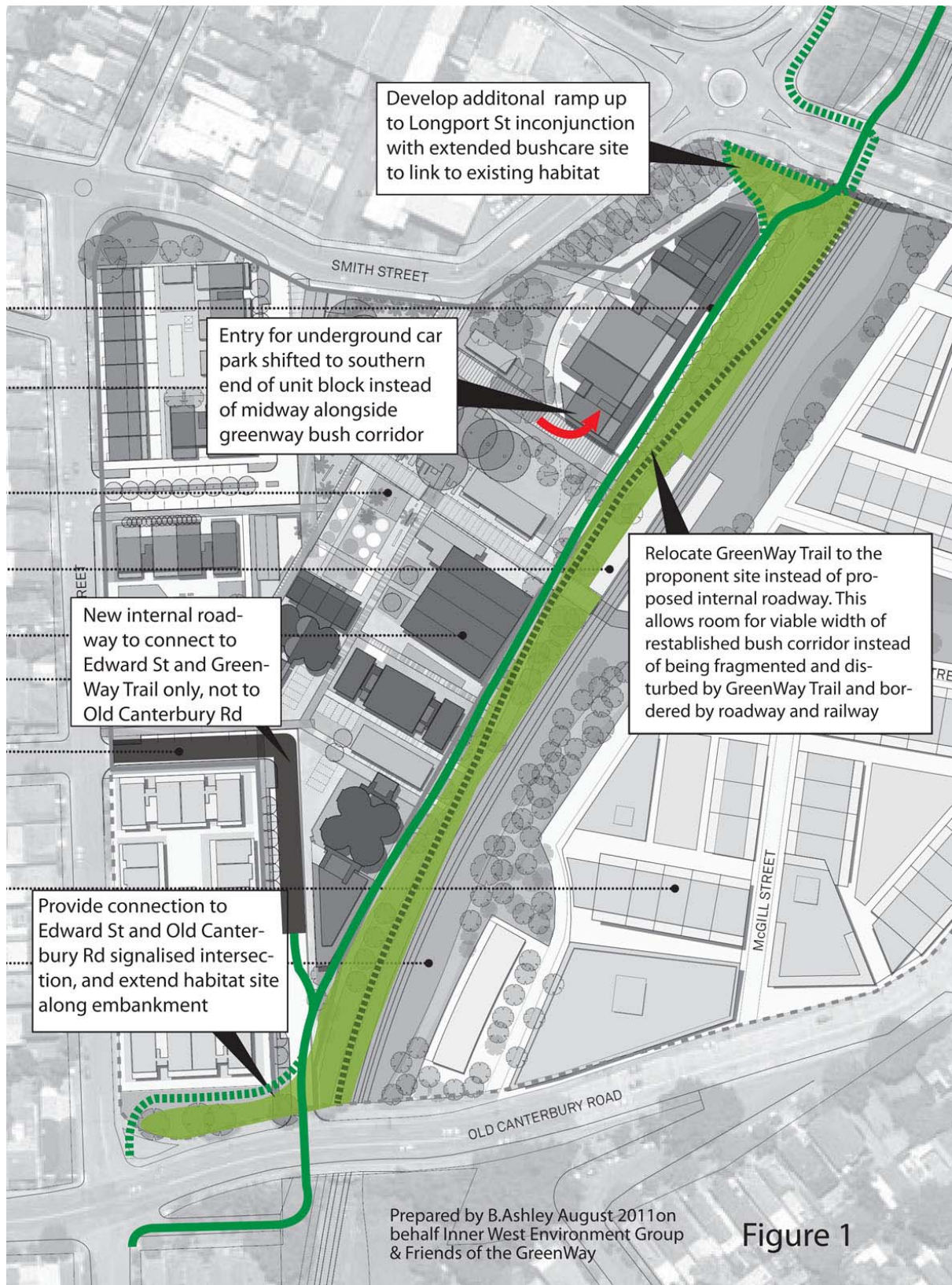


Figure 1