

...August, 2011

ATTENTION: Ms Amy Watson
Major Project Assessment
Department of Planning
GPO Box 39 SYDNEY NSW 2001



BY EMAIL: plan_comment@planning.nsw.gov.au

RE: Application No: MP08_0195 78-90 Old Canterbury Rd, Lewisham - Preferred Project Plan

I object to the applicant's Preferred Project Plan, currently before the Department and available for viewing on your website, for the following reasons:

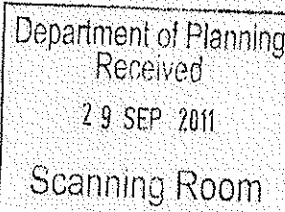
- 1) There are seven (7) bulky buildings proposed, with heights ranging up to ten (10) storeys, now to contain some 430 flats, which remains a gross overdevelopment of this site. It proposes a density and scale which is completely at odds with the established and valued character of the surrounding residential locality.
- 2) The amount of floor space for these 430 flats (and the smaller amount of retail/office areas) is more than double what Marrickville Council's McGill Street Master Plan would provide. The Council's masterplan was developed in conjunction with the community and there is no reason why its controls should not be observed.
- 3) The buildings proposed are too close to each other, so many residents will have no privacy and their flats will get little or no sunlight. Courtyards and walkways are also in shadow. Buildings A and B are each ten (10) storeys high but only four (4) metres apart, with the walkway in this 'canyon' unsafe to use.
- 4) The adjoining and nearby roads and streets are currently heavily used and many intersections are almost gridlocked in peak periods. Aside from 'left turn only' restrictions and a suggestion of traffic lights at Edward St and Old Canterbury Rd, nothing is proposed to cater for the increased traffic generated by the proposal. McGill St will become the main access turning to and from Old Canterbury Rd and is far from safe. Hudson St is barely wide enough for two-way traffic so no parking (or unloading of vehicles to service the shops) will be possible. Parking in other streets is restricted, many flats will have no car spaces allocated at all and visitor parking is inadequate.

Approval of this concept plan will set a precedent for the adjoining industrial lands also proposed for residential re-development. At this density over 1000 flats can be expected, a disaster for current and future residents alike.

The Council and community's planning for this area should be respected, not disregarded. The Concept (Preferred Project) Plan should be rejected.

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ATTENTION: Ms Amy Watson
Major Project Assessment
Department of Planning
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26th September 2011

Dear Ms Watson

RE: Application No: MP08_0195 78-90 Old Canterbury Rd, Lewisham - Preferred Project Plan

I write on behalf of the No Lewisham Towers Inc (NLT) Committee to raise concerns, highlight errors and misleading information, and to express significant objections to the above Preferred Project Plan (PPP), currently before the Department of Planning and Infrastructure (DOPI) and available for viewing on your website.

1. Transparency in Decision-making

As the current NSW Government has fully acknowledged, the Part 3A process is seriously flawed. Despite the passing by the Parliament of the Environmental Planning and Assessment Amendment (Part 3A Repeal) Bill 2011 and the fact that this PPP does not meet the criteria for State significant projects, in this case the Government has decided on continuing with this flawed process, rather than referring the proposal back to Marrickville Council for assessment and decision. Also problematic is the fact that the current PPP contains erroneous information that seriously impacts on the viability of what is being proposed. In addition, some of the documentation is incorrect and extremely misleading, as is detailed below. The fact that the Government has decided not to re-exhibit the current PPP despite repeated requests from NLT and the community that this occur, means that the community has not been given the opportunity to comment on a true representation of what now is being proposed. Notwithstanding all this, the NLT Committee has examined the PPP plans and reports and brings the following to your attention.

We request that this submission be passed on to the PAC in its entirety.

2. Inconsistencies and Errors

The community wishes to draw DOPI's and PAC's urgent attention to two critical issues contained in the current PPP documentation. As outlined below, we are concerned with gross errors and misrepresentations in the Survey Plan and View Analysis supplied by the proponent, which have very serious implications for drainage and flooding considerations as well as building heights.

2.1 Survey Plan

Our review of the Survey Plan supplied with the Preferred Project Plan has disclosed a discrepancy between the height of the "Origin of Levels" noted on the face of the plan and the

data base of the "Survey Control Information Management System" (SCIMS) of Land and Property Information (LPI). The "Origin of Levels" SSM81797 is shown as "RL:16.0" on the face of the survey plan, with the "Datum" recorded as "AHD" (Australian Height Datum). However, the SCIMS data base at LPI records shows SSM81797 to be RL 15.5 AHD, revealing a 0.5 metre discrepancy.

The origin of levels of the Survey Plan is critical to the evaluation of the proposal, as it sets the datum for heights of all the reports and plans contained in the Preferred Project Plan. If the origin of levels of the Survey Plan is incorrect, then concept plans, the flood study and other reports based on this plan are all in error. The origin of levels is critical in setting the height limits on proposed buildings and for evaluating the impact of the flood study. The close proximity of the proposal to the canal means that it is vital that the site levels are correct relative to AHD to avoid any up-stream impacts on the canal and surrounding properties.

We request that the levels be checked by an independent Registered Land Surveyor and the results delivered to the Department of Planning and Infrastructure (DPI) and to the community prior to completion of DPI's analysis of the PPP. Any errors must be brought to the attention of the PAC to inform its determination of this PPP application.

2.2. View Analysis

We have reviewed "View 1" of the "View Analysis Study Plan" and believe that "View 1" is a gross misrepresentation of the impact of the building contained in the proposal.

14.1_View Analysis Study Plan – View 1 shows a photomontage of the proposed view of the subject site looking in a north-western direction down Henry Street from the intersection with Victoria Street.

Attachments herewith include:

- an aerial photograph - showing the view line with the proposed new buildings superimposed in yellow,
- a section diagram – showing a section along the view line with the proposed and existing buildings indicated, and
- a copy of 14.1_View Analysis Study Plan – View 1 – showing a true representation of the impact of the proposed new buildings on the view. The attachments clearly demonstrate that the red outline depicting the proponent's version of the proposed building impact is grossly in error and that the true impact of the building is more than double the height depicted by the proponent.

Due to the limited time and resources available to No Lewisham Towers Inc, we have only examined View 1 of the 8 view photomontages contained in the View Analysis. We believe the error demonstrated in our review of View 1 calls into doubt all the views contained in the analysis.

We request that all 8 views be checked and certified by an independent Registered Land Surveyor together with a comprehensive explanation of the procedure used to check each photomontage, and the outcomes be made available to the PAC and the community, clearly drawing attention to any inconsistencies.

The View Analysis Study Plan was presented to the community during the public exhibition period. Given that View 1 is so grossly in error, we believe the community has been misled by the representations in the photomontages presented. ***We therefore believe that the reviewed and corrected photomontages should go back on public exhibition to enable the community to fully understand the impact of the proposed buildings.***

Both the aforementioned critical issues (points 2.1 and 2.2) disclose a misrepresentation of the impact of the Lewisham proposal on the local environment. We are concerned that there may be many other critical errors and misrepresentations contained in the PPP.

The PPP is presumably the applicant's final proposal, refined after full and further consideration of the comments of the NSW Department of Planning and other authorities, his advisors and those of the community during the exhibition period. It is very concerning that there continue to be errors and wrong descriptions in the plans and inconsistencies between the PPP reports and those plans. Some of these were obvious and are noted above; without a forensic examination, what confidence can there be that more will not be found? The applicant may consider that a concept plan is of its nature broad-brush so that the focus is not on detail. However, many of the key parameters for future project applications (or DAs to Council) are set by the approval of a concept plan – building envelopes, FSR, site layout and accessibility, public/private open space etc. The 'detail' of these matters needs to be clear and specific otherwise no-one really knows what is intended and very undesirable consequences are set in train to be suffered by new and old residents

3. Wider Urban Development Implications

The community is particularly concerned by the total development (Allied Mills and Lewisham Estates) that is proposed. It is the equivalent of an entire new suburb being crammed into one twentieth of the area of the two existing suburbs within which they are located.

We wish to emphasize that we are not against development. However, poorly designed gross over-development of this scale and density is extremely problematic both in itself and in terms of the precedent it sets for urban development around other suburban transport nodes.

The community is concerned that the Metropolitan Transport Plan, the Sydney Metropolitan Plan, and its accompanying sub-regional plans do not properly co-ordinate, plan for, and understand the impacts arising from significant increases in development in a local area such as ours. We highlight that we are on the border of two local governments areas (Ashfield and Marrickville), with a third nearby (Leichhardt). We are on the border of two sub-regions for Metropolitan Planning (Inner West Subregion and South Subregion). From reading all these plans, it is evident that in our border area, there is no clear planning consideration of the wider impacts across borders of the significant proposals for the adjacent Allied Mills and Lewisham sites.

We wish to highlight that in terms of increased development in our area, there also is, or could be development of the following:

- i) the former industrial area that is the focus of this development - the Lewisham Estates site and the remainder of the McGill Street Precinct;
- ii) the former industrial area that is the Allied Mills site, and the remainder of the industrial land that does not fall under the proposal;
- iii) Summer Hill centre, and its former industrial sites (past proposals show this);

- iv) small infill developments on former Industrial land in Summer Hill (eg Smith St);
- v) to the north in Leichhardt, there have been multiple proposals in the Parramatta Rd/Tebbut St area, which would affect Old Canterbury Rd; and
- vi) adjacent to Lewisham Station - proposed increase in density by Marrickville Council in its LEP.

All of these need to be considered together as it affects the same area, roads, public and private transport, community services, recreational open space etc. The community has the right to expect good planning and assessment that takes into account all relevant information and filters out deception, mis-information and illicit forms of influence.

Until the development and its impacts are considered in the context of what else is going on around it, the true impacts on the community will not be on the table for the Planning Assessment Commission and its Commissioners to properly consider.

4. Planning for Services, Facilities and Utilities

Lewisham Estates' proposal, which is one of two major developments adjacent to one another, will have wider consequences for the region in terms of demand for road and pedestrian space and public transport access, as well as the increased need for the necessary social, physical, economic, recreational or cultural services, utilities or facilities to service the equivalent of a whole new suburb.

Even as things are now, the local community needs much more open space, more playgrounds and recreation space both active for sports and quiet places for sitting and for families playing. There is also the need for more spaces in the local childcare facilities and schools to cater for the existing population, let alone a new suburb's worth of growth. In addition there is the need for greater and improved health services, aged and disabled services, social services, etc.

Environmental sustainability is an increasingly important issue. Water and energy costs are increasing, yet we see nothing in these proposals that pays any attention to the changes that are already happening and can be expected to increase.

With 430 dwellings (est. 946 people), it is reasonable to expect there will be a number of apartments containing children. As a similar example we can look to the Rhodes Peninsula apartments which have enough children living in them to generate the need for a new school. Yet, this was never considered and planned for. We can reasonably expect the same will apply to development over the McGill Street precinct and the area of Allied Mills and the remainder of the industrial area. Nor is there evidence that any other community services, facilities or utilities have been thought of or planned for.

Given the scale of these developments, it is clear that a Social Impact Statement is essential.

The community considers that the Lewisham Estates and Allied Mills proposals are deficient on all these grounds, and thus cannot even be considered until an assessment is made of what will be their impact on existing services, facilities and utilities, and what new services, facilities and utilities will be required. Following this, the developers should be allocated responsibility for paying a fair share of the costs of what is required.

5. Pedestrian and Transport Connections to the Surrounding Area

When the entire former industrial area around McGill Street and Allied Mills is eventually developed, it is obvious that there will be significant demand for pedestrian, cycling and public transport provision as well as cars to move people to and from the places they need to go.

Nowhere in the PPP is there any analysis to show the connections that people from this large development are likely to need. It is probable that they would use:

- Lewisham and Summer Hill stations;
- several bus stops in the area (eg Parramatta Road, Old and New Canterbury Roads and along Railway Terrace);
- shops in Petersham, Summer Hill, Leichhardt and Marrickville;
- local child care centres;
- primary and secondary schools and Petersham TAFE;
- local parks;
- local community facilities and halls;
- local community organisations, such as churches, etc.

It is clear that the application has not considered the impact on pedestrian paths, cycle facilities, and the dramatically increased need for upgrades to these, in order for the development to be able to connect to the surrounding area and integrate with it. We also note that the majority of the named possible destinations above do not lie on the proposed light rail route.

The Traffix report notes that the future light rail will significantly reduce car dependency in the area. Traffix has no evidence or analysis to back this claim. Whilst the light rail may help some children go to schools along the route, it serves few other destinations that most people will need to go, apart from the Fishmarkets or the Casino. The existing buses and train are more direct, faster and will probably be cheaper for access to other local destinations and the CBD. There is no evidence that Traffix has adequately examined what activities local people undertake and where these activities are located. For Traffix to claim that the light rail will significantly reduce car dependency shows that they do not know how people in the area use their cars, and where they go. This statement is unsubstantiated and therefore misleading.

The only links considered but not viably planned for (ie: no concept plan) are:

- that there will be a light rail stop adjacent to the development (only motherhood statements are made with regard to connecting to it) and
- that a pedestrian bridge could be built from Brown/Longport Street to Lewisham Station.

There are no further suggestions for road or footpath widening or enhanced facilities. Given the complexities of the location, the placing of a pedestrian bridge, how it could be accessed from all possible desire directions, and potentially the need to change the roads themselves because of the cumulative impact from the proposed and possible development, **a much more comprehensive transport analysis is required.**

The potential cost, and design implications of the bridge location should have been tested by design, showing how it could work:

- at the Lewisham Station end (where there is no space between the road and the station itself on the north side), and

- how the footbridge would link with all the possible directions from which people would access it - from the west (Summer Hill, Allied Mills, Lewisham Estates) and north of the railway line, etc.

Equally, given that a strong line of desire will be to access the shops, railway station and community facilities in Summer Hill, there is no indication of co-operation or planning between the developers of the Allied Mills and Lewisham Estates sites, to allow for the potential volume of people walking and cycling up to the Summer Hill centre. Nor is there any indication of how the footpaths might be upgraded to meet this increased demand, nor improvements to cycle paths and other facilities that will need to be put in place to meet the new demand.

While the proponent has indicated that it is premature to consider what might be required in any Planning Agreement, and has not carried out any proper impact assessment, given that there has been no proper assessment of what actual demands will be placed upon the area and its services, facilities, utilities and connections, this application is clearly incomplete and missing significant information that is essential to assessing its true impact on our community.

At the least, prior to assessment by the PAC, there should a full impact assessment of the need for augmentation of the connections (footpaths, pedestrian bridges, cycleways, bus services, etc) to other places in the area that will arise from development of this site.

6. Density and Floor Space Ratio (FSR)

The community is deeply concerned over the densities proposed by these new developments. The Lewisham Estates development proposes 430 apartments on 1.31 hectares (according to their documents), and the Allied Mills development proposes around 300 apartments on 2.47 hectares, a total of 730 new apartments. This is an area of just over half of the block bounded by Old Canterbury Road, Edward Street, Smith Street, and Longport Street.

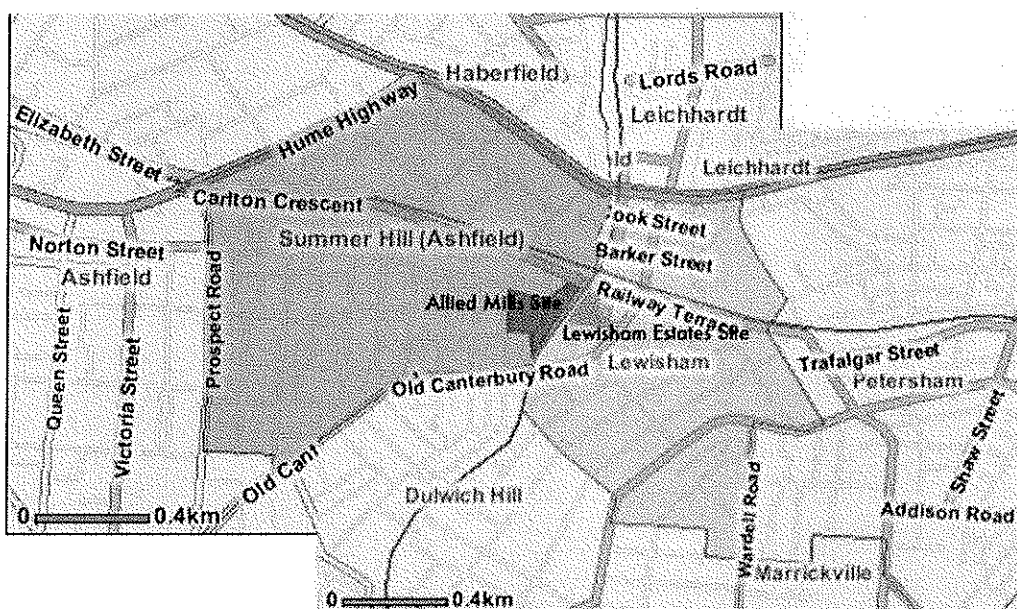
Therefore, in the remainder of the block bounded by these same streets, there is potential for at least another 316-852 apartments, should these two developments be approved under their current densities, depending which density figure is accepted. This would mean that there would be a total of almost 1,046 - 1,582 new apartments proposed for an area that is far less than 1/20th of the area of the surrounding suburbs. At the last census (2006), Lewisham only had 1,058 residences (area ~64.5 Ha) and Summer Hill had 2,530 residences (area ~ 110 Ha).

The Lewisham Estate proposals represent a density of 328.24 dwellings/hectare (gross), which is twenty times Lewisham's density of 16.4 dwellings/hectare (gross).

The Allied Mills proposals represent a density of 121.46 dwellings/hectare (gross), which is five times Summer Hill's density of 23 dwellings/hectare (gross).

LOCATION	AREA	DWELLINGS	PEOPLE	People/Dwg	Dwg/Ha
Summer Hill	110 ha	2,530	5,296	2.1	23
Lewisham	64.5 ha	1,058	2,377	2.25	16.4
Allied Mills Site	2.47 ha	300	660 (est)	2.2	121.46
Lewisham Estates	1.13 ha	430	946 (est)	2.2	328.24
Remainder of Mc Gill St. Precinct	2.6 ha	~316 - 852	695 - 1,874	2.2	~121 - 328

TABLE 1: Dwellings, Population and Density



MAP 1: Comparison of the area of the sites to the surrounding suburbs (source: ABS)

The FSR of the PPP at 3.15:1 is more than double that specified under Marrickville Council's McGill St Masterplan and clearly excessive. To some degree the floor space allocated to retail in the previous plans has been retained in the PPP and results in wider and higher buildings, with a dwelling yield now to 430 units (up from 400 as exhibited), despite the Department of Planning requesting that the dwelling yield should be reduced.

The sheer difference in density, taken at a gross figure, shows how incompatible the proposed development is with the surrounding area. The development, at 328 dwellings per hectare (and an FSR of 3.15:1) is 2,000% denser than Lewisham. It is approaching the densities of Asian cities such as Hong Kong! This is not an appropriate scale and density for a small village centre in the inner suburbs. The FSRs shown in the McGill St Masterplan is at a density which more closely accords with community expectations.

The documents submitted to the Department of Planning give no clear rationale as to why the developer should be allowed such a massively greater density than either the McGill Street Masterplan or the Allied Mills development, and why the Council-adopted FSR is unreasonable or inappropriate and is being ignored. In terms of economic yield for the developer, the Allied Mills development, at half the FSR (which we also believe to be an over-development) must be economically feasible, otherwise it would not have been proposed. We also note that it involves refurbishment of old historic buildings which is likely to be more expensive than new building. Thus we consider that for the Lewisham Estates site, a similar density should be more than economically feasible.

This level of proposed residential density would lead to access and site circulation problems on what is a very constrained site. It disregards the objectives and wider strategy of the McGill Street Masterplan, and it would clearly create an undesirable precedent for the development of the sites south of Hudson Street and NE of Brown/William Streets.

The Department of Planning and the Planning Assessment Commission should consider the differences in density and feasibility between the Lewisham Estates proposal and the Allied Mills proposal and require the Lewisham Estates developer not to exceed the FSRs in the Marrickville Masterplan. We believe that there are no grounds whatsoever for such a massive difference in density between these two proposals, and there have been no clear grounds put forward by the proponent for why this should be allowed.

7. Height, Bulk and Scale

The PPP continues to depart from the limits sets by Marrickville Council's McGill St Masterplan and fails to address the concerns raised by the Department in its 14/2/11 letter to the applicant. There are seven (7) bulky buildings proposed, with heights ranging up to ten (10) storeys, now to contain some 430 flats, which exacerbates what already was previously a gross overdevelopment of this site. It proposes a density and scale which is completely at odds with the established and valued character of the surrounding residential locality. While acknowledging that this redundant industrial site is in 'transition', what is proposed is very far from a depiction of the 'desired future character of the area', as required by sections 10 (scale) and 18 (aesthetics) of the Design Quality Principles of SEPP 65.

In particular –

- a) Building A is in fact 10 storeys in height for its northern third, before stepdowns to 9 and then 7 storeys adjacent to the proposed plaza. The maximum height at this southern end should be 4 storeys (being a compatible scale to Building C at its southern end) to avoid dominating and completely overshadowing this plaza which, fringed by shops and cafes and adjacent to the light rail station, is likely to be a very active pedestrian area.
- b) Building B is in fact fully 10 storeys in height. This is excessive. The overall width is 21m and is only separated from Building A (same width, also 10 storeys here) by 4m. Presumably the facing ends of these buildings will be blank walls to the public walkway between them, creating a 'canyon' over 25m high and 21m long permanently in shadow and totally unsafe to use. CEPTED principles have been ignored.
- c) The triangular section of Building C (in reality 7 storeys in height) is inappropriate and appears to be an attempt to 'shoehorn' an envelope to maximize dwelling yield. This section should be deleted in order to provide more contiguous (north-facing) open space for future residents.

- d) Building D adjacent to Longport St is 8/9 storeys in height and is now 23m in width, a bulky building hard against the street embankment which would allow little or no light to its lower residences and no landscaping or other measures to afford visual amenity. The building will appear as 7-8 storeys adjacent to this busy road and dominate the locality.

NOTE: The Building Heights depicted on master plan 12.5 are incorrect. Section plan 12.7 shows the addition of what is called a 'lower ground' (LG) floor which it is actually above the natural ground level. It is in fact the ground floor of each building. Each building is therefore one storey higher than what is noted on sheet 12.5. The noted bounding streets for some sections drawn are also incorrect.

This also does not indicate additional height impacts likely from roof level lift overruns and plant and equipment.

This is either inadvertently or deliberately misleading and must be brought to the attention of the Planning Assessment Committee.

8. Building Setbacks and Design Quality

Despite the peer review by Simmons Architects that there is general compliance with SEPP65, this is **not** the case at all. This is largely because the buildings are significantly higher than what Marrickville Council's commissioned Masterplan states is suitable for the site. In particular the separation between buildings, as noted below, are suggested minimums based on SEPP 65. **This also clearly demonstrates the PPP's significant non-compliance with SEPP65:**

- Buildings D to B - 18m at minimum (only 12m is shown on plan- thus overshadowing of apartments will occur - a further non-compliance);
- Buildings C to E - around 13m at minimum (only 9m is shown on plan); and
- Buildings F to E - around 13m at minimum (only 9m is shown on plan – thus overshadowing of apartments will occur)

Without the suggested "recessing" at the upper levels of the buildings (which is inferred by our reading of sections 12.5 and 12.12 together), all buildings would significantly fail to meet these criteria. Increased setbacks would create more potential for better quality open space, and for buildings in a N/S orientation, more sunlight penetration to residences and open areas alike.

We note that the separation between Buildings A and B has been **reduced** from the exhibited plan, from 6m to 4m separation in the PPP. There is no reason given for this, nor is there any statement as to compliance with SEPP 65 or the Building Code of Australia in this regard. We must ask whether these are proposed facing blank walls, over 25m high, and if so how does this demonstrate 'design quality'? The walkway that they frame will be in permanent shadow and there will be safety/security concerns that should be glaringly obvious. ***In this regard, given the significant design changes, the CPTED report will need to be redone to examine such issues as this, and make appropriate recommendations. From this CPTED perspective, design changes are likely to be required.***

Not only does this raise compliance, overshadowing and security questions, but also **privacy** is an issue with facing apartment blocks in such close proximity to one another.

9. Site Layout and Accessibility

McGill St and Hudson St would provide the main vehicular access to the residential and retail/office uses and to/from the light rail station.

McGill St currently services the hardware store, light industries and residences fronting that street; a right of way extends from it to a major site (no 120C) below the Old Canterbury Rd embankment (for which a DA proposing a large industrial building has been submitted) and the existing 2-storey mattress warehouse/showroom (no120B). McGill St is a narrow street with poor visibility for turning movements to/from Old Canterbury Rd. Its capacity to service Buildings A-D is extremely limited.

While Hudson St is nominated as 'main site entry', the carriageway (kerb to kerb) is less than 5m wide and it can only function for 2-way traffic if continuous 'No Stopping' applies on both sides of the street. With no loading docks proposed anywhere on the site, how will the shops in Buildings C and E get their stock? Trucks unloading in Hudson St (and then goods being trundled across the park) will block the traffic flow. No street parking is proposed near the plaza or the light rail station, which is a major oversight and potentially a very significant problem for 'kiss-and-ride'. The extension of Brown St through to Hudson St would be essential to provide site accessibility and some scope for street unloading to serve these shops. Similarly the linking of the proposed new road (between Buildings A/B and the light rail line) to Brown St would relieve traffic congestion and improve access.

The proposed pedestrian experience would be unpleasant and confusing. The (few) building entries are not readily found, with long corridors then to be walked along in order to reach each unit's door. Comparing the pedestrian access routes shown with what is intended to be private (presumably courtyards) or communal open areas, indicates that accessibility will be frustrated and in some cases pathways will come to a dead end. The consequence of this is that occupants will be faced with convoluted access every day and visitors to many residences will have considerable difficulty finding them. The pathways shown in the PPP criss-cross (and therefore diminish the value of) the open space areas provided, with irregular spaces of little utility.

It is noted that the Department's letter of 4/2/11 to the applicant requires more areas for recreation and deep-soil planting. The PPP basement (parking) level extends across the site, however, an examination of the sections does not lead to any confidence that significant areas of deep-soil planting would actually be available. This clearly limits the on ground landscaping amenity of the site.

10. Public Transport and Traffic Management

10.1 Transport & Traffic

To bring the equivalent of an entire suburb's transport, travel and parking demand into an area that is less than 1/20th of an existing suburb creates obvious seriously challenging demands.

The traffic generated by an additional 730 apartments, and associated uses, with the potential for another 316 and up to 852 apartments on the remainder of the industrial area, in addition to the proposals for Allied Mills, will grid-lock the roads in this area, as well as place extraordinary pressure on existing bus and trains services, which are already under considerable stress.

The Traffix report from May 2011 notes that, "The site is uniquely placed to take advantage of excellent public transport services."

However, as explained in section 5 above, Traffix has failed to examine the **capacity** of the existing services, where any of the services take people and when, or if new services might be required as a result of this development. This is not to mention the potential for another 316 and up to 852 apartments on the remainder of the industrial area, in addition to the proposals for Allied Mills. We would like to remind the Department of Planning that this is the tip of an iceberg of possible development in this area, and from a transport perspective, it must be assessed as part of the immediate wider area.

LOCATION	PEOPLE	Ppl Emp. 15+	JtW Pub Tran	JtW Car	JtW Other
Summer Hill	5,296	3,345 (63%)	~1,250 (37.4%)	~1,358 (40.6%)	~737
Lewisham	2,377	1,475 (62%)	~485 (32.9%)	~622 (42.2%)	~368
Allied Mills Site	660 (est)	412 (62.5%)	144 (35%)	171 (41.4%)	~97
Lewisham Estates	946 (est)	592 (62.5%)	207 (35%)	245 (41.4%)	~140
Remainder of Mc Gill St. Precinct	695 - 1,874	~434-1,171	~152-410 (35%)	180-485 (41.4%)	
TOTAL potential new	2,301-3,480	1,438-2,175	503-761	596-901	

TABLE 2: Journey to Work Estimates (best case scenario)

The community has researched the nature of how our transport is used. We found that from sources such as the Bureau of Transport and Regional Economics (BTRE), Australian Bureau of Statistics (ABS), and the NSW Ministry of Transport that the Journey to Work only represents generally around 22% (and up to 27%) of all journeys. In regard to the Lewisham Estates and Allied Mills developments the total number of journeys to work will be similar to the number of employed people for the developments (1,004). Thus, given that the Traffix assessment only looks at Journey to Work, their assessment only represents 22% of all possible journeys (4,564 total). Most likely, there are another 3,500 journeys unaccounted for in the traffic and transport planning reports.

If we multiplied these factors to take into account the potential development on the remainder of the industrial land, 1438 - 2,175 additional journeys (@22%), this would equate to around a total number of 6,545 - 9,886 journeys for all purposes unaccounted for - the vast majority of which have not been examined for their impacts on public transport and road systems. We find this a staggering omission.

Further, the studies for the development do not examine the loading factor on either the trains or the buses, and thus do not present the real situation or accurately measure and assess their impact. Nor do they assess the cumulative impact of the Lewisham Estates development with the Allied Mills development. And further, they do not assess the likely impact that will come when the remainder of the area is developed.

The streets around the Lewisham site are very congested during peak hour. The recent independent traffic study by Colston, Budd, Hunt & Kafes, May 2011 commissioned by Ashfield Council demonstrated that these two sites together, will generate significant traffic - 1,000 more

cars per hour in peak hour. If the rest of the designated industrial area is developed, this could double. We understand that these additional 1,000 trips are only in regard to the 22% of trips that are related to journeys to work. The community is very anxious about how the additional trips beyond this - the additional 78% - would impact on their capacity to travel by any means, not only during the working week but also at weekends.

The community has considered how additional road space might be found for the increased demand for car travel. To cope, the intersection of Old Canterbury Road and Railway Terrace would most likely need to be graded separated. However, currently there is no room for this expansion to take place, nor could roads be widened without significant expense being incurred due to the need for property acquisition and tunnelling beneath the main western railway lines ie only at really significant expense can adequate road capacity be provided. Given the history of low levels of government investment in infrastructure, this is probably not going to happen any time soon if ever. And given the reticence of the development industry to contribute anything towards significant works outside their boundaries, despite their being the cause of the problems, it most likely will not happen.

Further, It is not proposed by the developer that the local streets internal to the development upon which new residents and retailers will depend for access are to be upgraded. Especially for the Lewisham Estate development, the immediately surrounding streets are so narrow that with parking on one side, there would be only one lane left for through traffic. What is clear to the community is that in the Lewisham Estates site, the wider area cannot be redeveloped without co-ordinated planning across the entire area of the McGill Street and Allied Mills precincts. At the least, this is because private property would need to be acquired for both street widening and for adequate open space. This would have to be done in a holistic manner, similarly to what is proposed in Marrickville Council's McGill Street Masterplan.

10.2 Parking impact in surrounding streets

We are concerned with the limited number of basement car spaces being provided in the proposal together with a total absence of on street carparking. The addition of 430 residential units with restricted parking availability and the additional parking requirements of the commercial and retail components of the proposed development will create a significant impact on the surrounding on-street parking.

Old Canterbury Road and Longport Street have "No Stopping" and "Clearway" restrictions, whilst **ALL** of the roads adjacent to the site having a limited number of available parking spaces. Hudson Street is currently running at full capacity Monday to Saturday during business hours and McGill Street is at full capacity 24 hours a day 7 days a week. Hudson, McGill, Brown and William Streets are narrow streets with parking limited to one side of the road only. Local streets in the wider area are already at capacity from on-street parking due to out of area people driving to Lewisham Station, Petersham TAFE and the local schools. By not providing enough parking and by inappropriately claiming that the light rail will reduce the demand for cars, it can only be surmised that the impact on parking in the surrounding streets will be significant.

We believe additional on-site at grade and below ground parking must be made available to avoid massive parking issues and to keep all site and visitor parking restricted to the western side of Old Canterbury Road. Obviously the impact is incremental depending on the development density.

10.3 On-site roads

With no changes proposed to the existing street network, given that members of our group live in the area and are familiar with the day to day functioning of the streets, we must challenge and question Traffix' assessment that the existing streets are sufficient to cope with the additional demand from the proposed development at Lewisham Estates and the light rail stop, as well as future development in the remainder of the McGill Street precinct. We believe that there needs to be new traffic modelling undertaken that takes into account what road space is needed in the area because of the development, as well as the light rail stop, and future development in the remainder of the area. ***There needs to be an assessment of the needs for street connections that will handle the full, final development of the area.***

11. Public and Private Open Space

11.1 Recreational and Public Open Space

We note that the Director of Metropolitan Projects, in a letter dated 4.02.11 requested that the proponent increase the area devoted to deep soil planting and recreation space. We agree that this request is warranted given the very "significant increase in GFA , dwelling yield and population density above and beyond the Masterplan".

Given the department has requested that the proposal be consistent with the McGill Street Masterplan, we request that the design provide the open public park as documented in the Council Masterplan of approximately (but not limited to) 3200sqm, and that it be useable.

The proposal provides limited open space in the same area of approximately 2400sqm. This area is criss-crossed with pedestrian paths and is of an irregular shape making it unsuitable for real public recreation, both passive and active. With a possible occupancy of 946 people, this means that there is only 2.6sqm of public open space per person. Whilst this is an improvement, it is way below the level of open space that should be provided per 1,000 residents.

As is shown elsewhere in our submission, this area could well house up to 2,300 to 3,500 people in the future. Even if public open space was supplied at 1982 rates of 1.25 ha/1,000 people (for Marrickville), then the McGill Street/Allied Mills precinct should have an allocation of 2.9 to 4.4 ha of public open space, just to provide for the new residents, let alone the deficit in the area for the existing residents. Yet the entire precinct is only 6.2 ha - another indication that what is proposed is a gross over-development. If we just look at the Lewisham Estates site alone, then for 945 people, 1.18 ha is needed, whereas the site is only 1.13ha. Again this clearly shows the degree of over-developed of the proposal for this site, and can come nowhere near providing the open space that the future residents will need.

11.2 Overshadowing

Given the incorrect information about levels, and the incorrect labeling of the number of storeys, one must question whether the shadow impacts have been accurately calculated. It seems likely that buildings will contain apartments that will not receive any direct sunlight, and buildings will overshadow open space for most, if not all of the day.

Therefore, we recommend an independent assessment of the shadow impact of the buildings on the proposed open spaces, building facades and individual units in the buildings.

11.3 Private Open Space

The development is significantly deficient in providing private open space for the future residents of the site. We believe from examining the plans in detail, that all that has been done is to draw arbitrary lines across the areas between buildings and mark them "private" open space. In particular, we draw your attention to the triangular space as a case in point. The whole triangular area has been designed as one space with no division, especially given the "paths" drawn on the plan. Whilst further open space is provided in between the proposed towers to the north we recommend that this area should be fully designated as private open space for the enjoyment of the new residents. Such an initiative would also be consistent with Marrickville Council's Masterplan.

Whilst it is possible to provide some private open space on balconies, given the density of the development, and non-conformity with building separation under SEPP65, any balconies will be too close to one other, and there will be very little if any real 'private' open space. Further, we believe that for the social good, future residents should have some ground level private open space that is only useable by them. The tiny spaces that have been provided will not be useable. They are only big enough to act as walking passages, and may well be overshadowed most of the time.

If so many people are to be crowded into such a small area with so little private and public open space, the lack of amenity and the impacts on the surrounding areas are of great concern.

The existing proposal is deficient in its provision of open space, as well as urban design and resident amenity. In the highly undesirable case that the Department would consider any increase in FSR over what is provided in the McGill Street Masterplan, then we would strongly recommend that there should be a proportional increase in real defined public and private open space.

11.4 Urban/Civic Open Space

With such an important piece of public infrastructure and facility as the light rail being located adjacent to the site, we would have expected that greater thought would have gone into the design of the urban and civic space adjacent to the station. Instead, what is proposed is a narrow access street leading to a car park entry and an awkwardly located round public amphitheatre blocking the public open space from the light rail stop. At this concept approval stage, it is important to set the design parameters for the site layout. In this proposal, the design does not acknowledge the urban and civic impact of a light rail stop and how it will facilitate safe resident and wider community access to it. In web searches we have found that around the world, pedestrian modeling studies are done when significant light rail stops are co-located with such dense development. **This part of the design needs much more careful attention.**

12. Sustainability & Public Housing

We have read the Sustainability Report by Cardno ITC. It is unfortunate that this report only presents a poor quality catalogue of possible sustainability design ideas and options that might be considered somewhere down the track. There are no guarantees or agreed solutions confirmed to be adopted in the development. The report finishes with what must be considered the ultimate cop-out "The final selection of ESD initiatives will depend on the technical and financial constraints of this project."

At this concept level, with the size, massing and orientation of buildings, as well as the numbers and types of units, it is actually possible to estimate what the energy and water consumption for the development could be. It is also possible to estimate the impact of insulation, shading and glazing on heating and cooling requirements, as well as the impact of energy efficient appliances on energy demand. On this basis, it is possible to give a fair indication of how much could be supplied by onsite solar, wind, geothermal as well as possible tri-generation, as outlined in the report. For the size and scope of a development like this and with the imminent introduction of a carbon price, to not do this shows no real commitment to addressing urban sustainability.

Likewise with water demand, it is well known how much per unit water is generally used in Sydney. With options for black water and grey water re-use becoming more common and now being implemented in many developments, a realistic set of options for the reduction in water demand could be put forward, with a realistic estimate of how much it could be reduced by.

Many residents in the Lewisham and Summer Hill area are actively seeking to reduce their impact through energy and water saving techniques, and it is reasonable to expect that this development would put forward at this stage estimates and realistic goals, which detailed design proposals will seek to meet - such as 60% energy reduction or 50% water reduction over average apartments. To have no clear goals beyond a motherhood statement about options to exceed BASIX, shows no commitment to sustainability.

Likewise with the provision for affordable housing, there is a very low commitment, given the large number of apartments proposed. In areas such as this, there is urgent need for more affordable housing, especially for key workers who are priced out of the area, but are needed to provide essential services such as emergency, medical, education services, etc.

13. Conclusion

We believe that the revised plans and response to the issues raised by the Department of Planning do not properly address the issues raised by the Department, and certainly do not come close to addressing the issues raised by the community. We have highlighted significant errors and either inadvertently or deliberately misleading statements, drawings and labels with regard to height, bulk and scale. Together with the other important issues we have highlighted, **we strongly assert that this proposal be rejected in its present form.**

However, if the proposal is not refused or the proposal is not to be sent back to Marrickville Council for its determination, then we request that:

- the **errors and inconsistencies in levels and the View Analysis Study/Plan** be checked and certified by an independent Registered Land Surveyor together with a comprehensive explanation of the procedures used to check, and the results delivered to the Department of Planning and Infrastructure (DOPI), the community and the PAC;
- in the light of the incorrect information about the levels and view impacts, all **shadow diagrams** be redone, and be independently verified by either a registered surveyor or qualified and experienced architect with no connections whatsoever to the proponent or their advisors;
- **all reports** be revised to take into account the possible cumulative impacts from all of the potential development in the Allied Mills and McGill Street precinct sites, with a proper estimation of the share that the Lewisham Estates development will contribute;

- a detailed **Services, Facilities and Utilities Report** be commissioned that will address the increased need for the necessary social, physical, economic, recreational or cultural services, utilities or facilities to service proportion that the Lewisham Estates development will contribute within the wider demand of the massive development proposed for this small area;
- a detailed **Social Impact Statement** be commissioned;
- the **CPTED report** be redone correctly;
- a **comprehensive independent Transport Analysis** be commissioned that examines all the journeys that are likely to be generated, the road space needs, the parking impacts, the pedestrian and cycling needs and impacts. It is preferable that this take the form of a **Sustainable Urban Mobility Assessment Plan**;
- a **full impact assessment** be made of the need for augmentation of the connections (footpaths, pedestrian bridges, cycleways, bus services, etc) to other places in the area that will arise from development of this site;
- an **Open Space and Landscape Planning Report** be redone that details realistic concept design proposals for private open space, public open space and civic space, as well as the design of the connections into and out of the site;
- a proper **Sustainability Report** be undertaken that will set goals/objectives for sustainability and as such will estimate energy and water use, with their corresponding targets.

In the interests of maintaining open and transparent government, we request that the recommended additional studies and independent reports be commissioned and a corrected revised PPP be required to be prepared by the proponent. These should then go on public exhibition to allow the community to fully understand the impact of the proposal and to have a chance to make submissions on correct, not misleading information.

The results of these studies and the community's responses to the revised PPP should inform the DOP's analysis. Only then, should this PPP be made available for determination by the Planning Assessment Commission.

When the PAC is convened to consider the new PPP, we request that representatives of the No Lewisham Towers Inc Committee be asked to appear to make a presentation to the PAC.

Yours sincerely

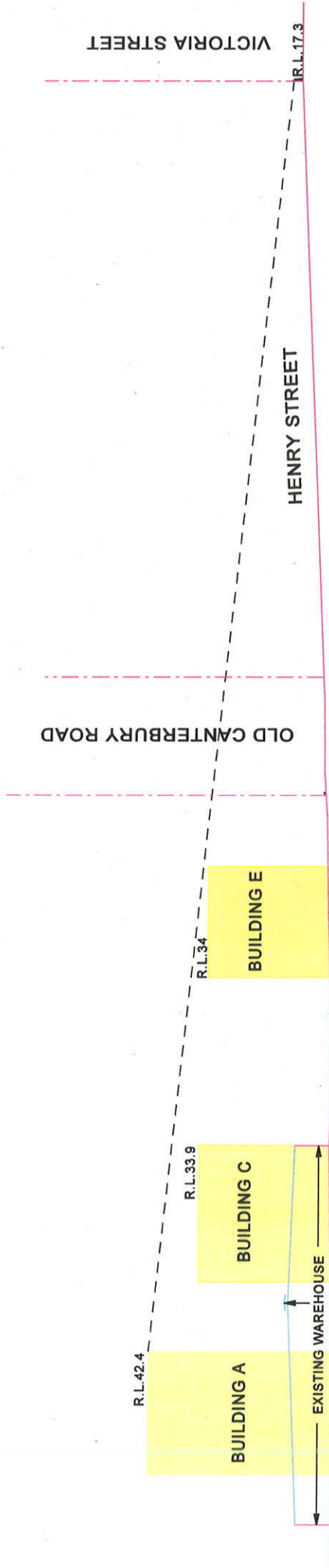


Tamara Winikoff

On behalf of No Lewisham Towers Inc Committee

38 Victoria Street, Lewisham, NSW 2049 - Ph: 0411 162 156

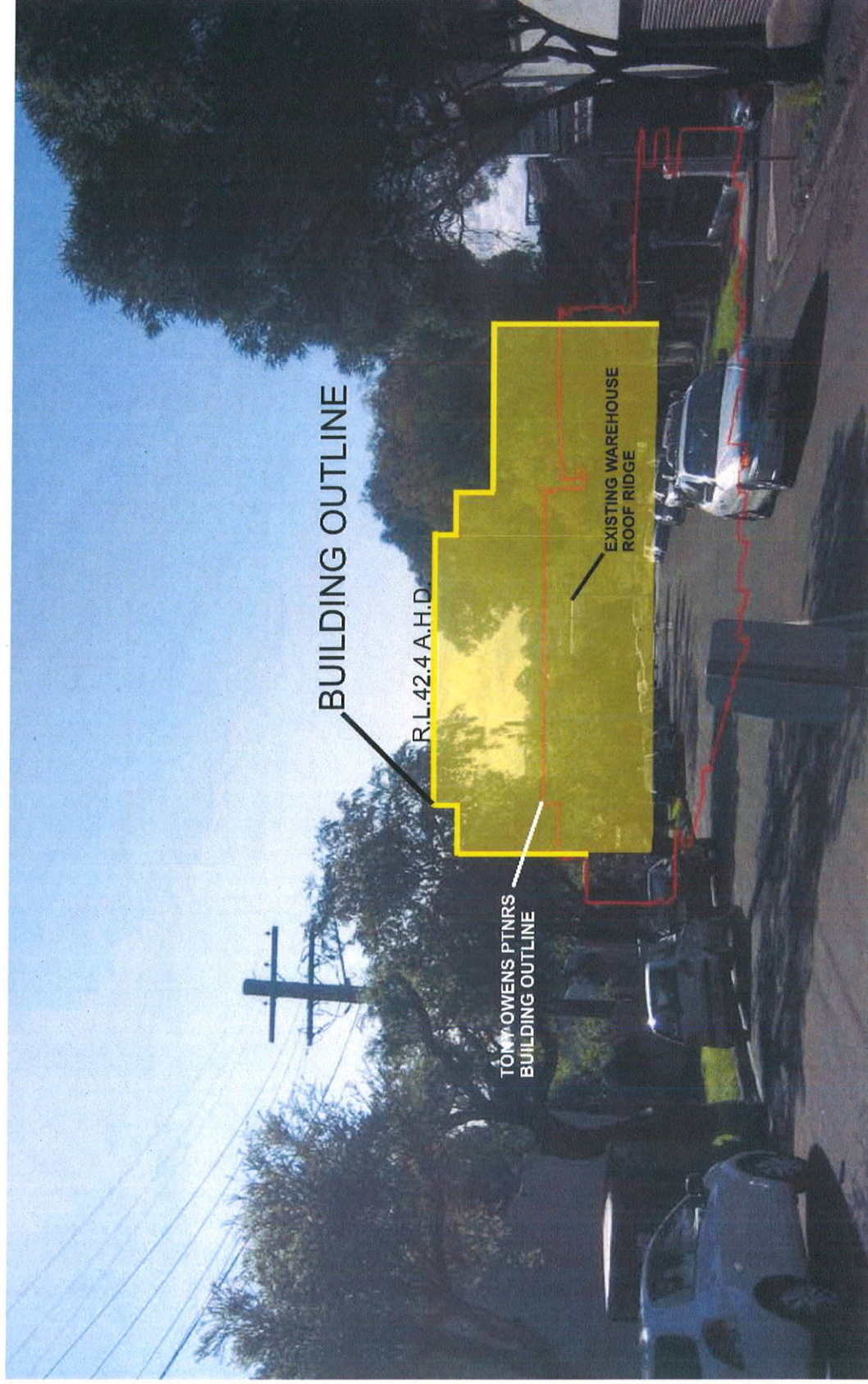




SECTION A - A THROUGH VIEW 1

14.1_View Analysis Study Plan

VIEW 1



Mark Brown - Application No: MP08_0195 78-90 Old Canterbury Rd, Lewisham - Preferred Project Plan

From: "Dorothy in OZ" <dlutherau@yahoo.com.au>
To: <mark.brown@planning.nsw.gov.au>
Date: 12/10/2011 12:54 PM
Subject: Application No: MP08_0195 78-90 Old Canterbury Rd, Lewisham - Preferred Project Plan

Dear Mark,

I read with alarm the revised plans for this site.

As a local resident, I feel the size and scope of the development is inappropriate.

I understand the need for more inner urban housing but I fail to see the need for more shops.

I live near the site & have 2 supermarkets within walking distance from my home already (Summer Hill and Leichhardt).

Other shops in both areas, in Petersham and Dulwich Hill (also in walking distance) are struggling to make a living.

More shops in high rent buildings will only exacerbate the problem, destroying local innovative & unique businesses.

Please insist that the developers reduce the size of their proposals to a reasonable height & composition.

They'll make huge profits as it is, by building on what is partly vacant land and destroying small businesses that use the site.

Please try to limit the destruction this selfishly planned monstrosity will bring.

Regards

Dorothy Luther

7 Hobbs St

Lewisham NSW 2049

(127)

**Amy Watson - RE: Application No: MP08_0195 78--90 OLD CANTERBURY ROAD,
LEWISHAM CONCEPT PLAN**

From: jeni Pattison <healthnfitness@gmail.com>
To: <plan_comment@planning.nsw.gov.au>
Date: Thursday, 13 October 2011 10:43 PM
Subject: RE: Application No: MP08_0195 78--90 OLD CANTERBURY ROAD, LEWISHAM
CONCEPT PLAN

I object
to
the
above
Concept
Plan,
for
which
an
Environmental
Assessment
is
currently
on
exhibition,
for
the
following
reasons:
• The
number
of
residential
buildings
proposed,
with
their
height
ranging
up
to
nine
(9)
storeys,
and
containing
some
400
flats,
is
a
gross
overdevelopment

of
this
site.
It
provides
for
a
density
and
scale
which
is
completely
at
odds
with
the
established
and
valued
character
of
the
surrounding
locality.

- The
proposed
retail/commercial
floorspace
is
excessive
and
the
2,800
sq
metre
supermarket
is
not
warranted.
There
are
more
than
adequate
shopping
facilities
(including
four
supermarkets)
within
15--
20
mins
WALK

of
this
site,
at
Leichhardt
Marketown,
Summer
Hill,
Dulwich
Hill
and
Petersham.
The
neighbourhood
shops
at
Lewisham
Station
(5
mins
walk)
need
some
support,
not
competition.
• The
provision
of
public
open
spaces
is
grossly
inadequate.
The
developer
wants
the
needs
of
his
1000
or
so
future
residents
and
retail/office
users
to
be
met
on
land

SOUTH
of
Hudson
St.,
beyond
his
site
and
on
land
he
doesn't
control.
The
proposed
900sq.m.
'green
boulevard'
is
just
that

—
a
divided
street
with
trees
down
the
middle!
Open
space
needs
should
be
met
on--site.
The
open
areas
shown
between
the
buildings
are
likely
to
be
accessways
and
private
courtyards,
not
usable
public

spaces.
• The
adjoining
and
nearby
main
roads
are
heavily
used
and
gridlocked
at
peak
periods.
The
suggested
line--marking
and
signage
restrictions
reflect
what
the
traffic
already
does
—
nothing
is
proposed
to
cater
for
the
cars
and
trucks
to
and
from
the
400
units
and
6,300
sq.
m.
of
supermarket,
shops
and
offices.
The
long--term

traffic
measures
are
far
from
certain
as
they
require
redevelopment
of
sites
and
street
changes
SOUTH
of
Hudson
St.,
again
beyond
the
developer's
control.

I
wish
to
make
some
further
comments
about
this
Concept
Plan

Marrickville
Council
and
the
community's
planning
for
this
area
should
not
be
impeded
or
pre--empted

—
this
Concept
Plan

should
be
rejected.

Jeni Pattison
5 Summer Hill St, Lewisham



ATTENTION: Ms Amy Watson
Major Project Assessment, Department of Planning
GPO Box 39 SYDNEY NSW 2001

BY EMAIL: plan_comment@planning.nsw.gov.au

RE: Application No: MP08_0195 78-90 Old Canterbury Rd, Lewisham -
Preferred Project Plan

I object to the applicant's Preferred Project Plan, currently before the Department and available for viewing on your website, for the following reasons:

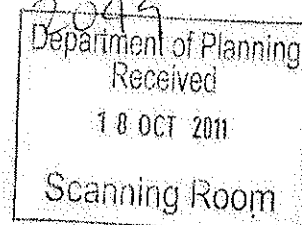
- 1) There are seven (7) bulky buildings proposed, with heights ranging up to ten (10) storeys, now to contain some 430 flats, which remains a gross overdevelopment of this site. It proposes a density and scale which is completely at odds with the established and valued character of the surrounding residential locality.
- 2) The amount of floor space for these 430 flats (and the smaller amount of retail/ office areas) is more than double what Marrickville Council's McGill Street Master Plan would provide. The Council's masterplan was developed in conjunction with the community and there is no reason why its controls should not be observed.
- 3) The buildings proposed are too close to each other, so many residents will have no privacy and their flats will get little or no sunlight. Courtyards and walkways are also in shadow. Buildings A and B are each ten (10) storeys high but only four (4) metres apart, with the walkway in this 'canyon' unsafe to use.
- 4) The adjoining and nearby roads and streets are currently heavily used and many intersections are almost gridlocked in peak periods. Aside from 'left turn only' restrictions and a suggestion of traffic lights at Edward St and Old Canterbury Rd, nothing is proposed to cater for the increased traffic generated by the proposal. McGill St will become the main access turning to and from Old Canterbury Rd and is far from safe. Hudson St is barely wide enough for two-way traffic so no parking (or unloading of vehicles to service the shops) will be possible. Parking in other streets is restricted, many flats will have no car spaces allocated at all and visitor parking is inadequate.

Approval of this concept plan will set a precedent for the adjoining industrial lands also proposed for residential re-development. At this density over 1000 flats can be expected, a disaster for current and future residents alike.

The Council and community's planning for this area should be respected, not disregarded. The Concept (Preferred Project) Plan should be rejected.

NAME: Rebecca Meryment

ADDRESS: 1 Hobbs St, Lewisham, NSW



August, 2011

ATTENTION: Ms Amy Watson
Major Project Assessment, Department of Planning
GPO Box 39 SYDNEY NSW 2001

BY EMAIL: plan_comment@planning.nsw.gov.au

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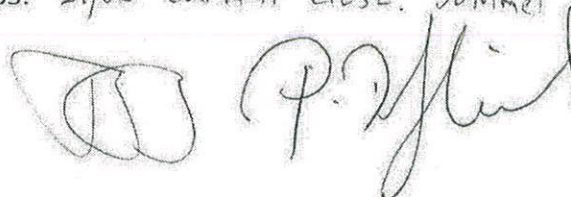
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NAME: Leanne & Philip Duffield

ADDRESS: 21/50 Carlton Cresc. Summer Hill 2130



...August, 2011

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Major Project Assessment
Department of Planning
GPO Box 39 SYDNEY NSW 2001

BY EMAIL: plan_comment@planning.nsw.gov.au

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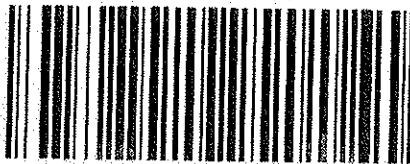
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NAME:

Geffrey Wolfe

ADDRESS:

16B Gower Street
Summer Hill, NSW, 2130



PCU027422

August, 2011

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Major Project Assessment, Department of Planning
GPO Box 39 SYDNEY NSW 2001

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NAME: GEORGE MYLONAS

ADDRESS: 10 HOBBS ST
LEWISHAM 2049

Department of Planning Received 28 OCT 2011 Scanning Room
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