

SJB Planning



Preferred Project
Report

2-32 Smith Street,
Summer Hill

Summer Hill Flour Mill
Site

26 March 2012

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Executive Summary

This Preferred Project Report (PPR) has been prepared in response to the request from the Director-General in accordance with Section 75H of the *Environmental Planning and Assessment Act 1979 (EP&A Act 1979)* to respond to submissions received to the exhibition on the Environmental Assessment (EA) of the Concept Plan for the mixed-use development of the Summer Hill Flour Mill site at 2-32 Smith Street, Summer Hill.

In response to submissions and agency comments the Concept Plan has been amended to:

- Reconfigure the proposed building heights;
- Increase the commercial floor space within the Mungo Scott building;
- Alter the project staging to provide public access to the proposed light rail in the first stage;
- Amend the treatment to the Hawthorne Canal as required by Sydney Water; and
- Delete the proposed access connection to Old Canterbury Road.

The supporting information has been updated to respond to both the amendments made to this application as well as relevant amendments to the Concept Plan on adjacent land known as Lewisham Towers (MP08_0195), being part of the McGill Street precinct. These changes relate particularly to the reduction in retail space proposed in the Lewisham Towers proposal and the consequential impact upon retail trade area and traffic generation.

The Summer Hill Flour Mill site and the adjoining McGill Street precinct represents significant opportunities for transit oriented development (TOD) that can utilise existing railway stations at Summer Hill and Lewisham as well as the extension of the inner west light rail which will include a stop located adjacent to the Mungo Scott building.

The PPR represents a substantive response to the matters raised and provides for a development of the site that demonstrates sound urban renewal of an area well served by existing and proposed public transport. Approval of the application is sought.

1.0 Introduction

This Preferred Project Report (PPR) forms part of the application for approval of a Concept Plan under Section 75M of the *EP&A Act 1979* in response to the Director-General's Requirements (DGRs) issued for the project under section 75F of the *EP&A Act 1979*.

The application was publicly exhibited for comment from 29 June 2011 until 12 August 2011. The submissions received by the Department have been provided and have been addressed in this PPR and the revisions to the Concept Plan.

The Department of Planning and Infrastructure (DP&I) wrote to the proponent on the 16 September 2011 identifying key issues and requested additional information and a response to these issues.

The key assessment issues identified related to:

- A reduction in height and form of a number of the proposed buildings;
- Traffic and transport impacts;
- The proposed land uses and in particular the amount of retail floor space; and
- The proposed staging and infrastructure delivery.

The additional information sought related to:

- Demonstrating that the appropriate residential amenity can be achieved, particularly in relation to compliance with the requirements of SEPP 65 Design of Residential Flat Development,
- Information relating to flooding and drainage impacts on the site;
- Justification of the proposed dwelling mix;
- Provision of a Simurban computer model of the proposal; and
- Response to the heritage matters raised by Ashfield Council and the Ashfield District Historical Society.

In response to these issues and matters raised by the community and state agencies the proposal has been amended.

The revisions proposed are:

- Building 1A now proposes a six (6) storey presentation to Longport Street, a central ten (10) storey element stepping down to a six (6) storey element.
- Building 1A at the ground floor level now includes terrace style dwellings providing dwelling entries accessed from the new street and potential to address a future Greenway in the light rail corridor.
- Building 5D fronting Edward Street has been reduced from four (4) storeys to three (3) storeys.
- Building 2A (the Mungo Scott building) all residential uses have been removed. Only commercial employment space is provided within this building above ground floor level with retail retained at ground level.
- Building 3D has had an additional level added, comprising two (2) additional apartments resulting in a seven (7) storey building adjoining the adapted silos.

- The extension of the new road behind the Edward Street properties will no longer link through to Old Canterbury Road.
- Building 5E is an adaptive reuse building that has been identified as being suitable for a potential childcare operation
- The maximum size of individual retail tenancies is 150 to 200 m² and dispersed along the public thoroughfare areas of the site confirming that a supermarket would not be possible.
- The staging plan has been amended to include the provision of public access through the site to the new light rail stop as part of Stage 1.
- Confirmation of the provision of deep soil planting to Edward Street.
- Amendment to the access over the Hawthorne Canal, reducing the amount of coverage of the canal as agreed with Sydney Water.
- Response to flood management concerns.
- Update of the Statement of Commitments

Building 3C (the four pack silo) and Building 5A (the six pack silo) remain unchanged. The retention of these proposed structures is provided within this PPR and the Visual Assessment at Attachment 3.

A further Traffic and Transport Assessment and consideration of the impacts of the development in conjunction with the proposed development of the adjoining site known as Lewisham Towers has been undertaken. This assessment has also been prepared in accordance with the requirements of Roads and Maritime Services (RMS) (formerly the RTA) and in consultation with the consultants engaged by DP&I to peer review the traffic assessments of this proposal and the adjoining Lewisham Towers proposal. The assessment identifies that the traffic impacts from the combined development have been substantially reduced particularly through the removal from the Lewisham Towers proposal of the supermarket and associated retail space.

The ability of the proposal to achieve SEPP 65 compliance has also been demonstrated through additional detail within the architectural package contained in the Concept Plan.

This report has been structured to provide:

- An introduction at Chapter 1
- An overview of the Preferred Project Plan at Chapter 2
- A response to the key assessment issues at Chapter 3
- A response to the submissions at Chapter 4
- A conclusion at Chapter 5

2.0 The Preferred Project Plan

2.1 The Exhibited Concept Plan

The exhibited Concept Plan proposed the adaptive reuse of a number of exiting industrial buildings existing on the site associated with the former use of the site as a flour mill and the construction of new residential and ancillary retail spaces. The Proposal seeks to redevelop the site to a mixed use residential, commercial and support retail development comprising:

- 280-300 dwellings contained within 29,500-33,500m² of GFA;
- 3,500-4,000m² of commercial space;
- 2,500-2,800m² of retail space;
- 450-500 basement car parking spaces in basement car parks provided below the new buildings;
- 8,400m² of publicly accessible open space;
- Publicly accessible linkages to the Lewisham West light rail stop at stage 4 of the development;
- 50-70 on-street car spaces; and
- New vehicle and pedestrian access points from Smith Street and Edward Street frontages of the site.

The proposal was to be developed in four (4) stages.

The resulting density expressed as a floor space ratio was in the order of 1.4:1 – 1.6:1.

The significant elements in regards to built form that have generated submissions were:

- The proposed ten (10) storey building adjacent to Longport Street;
- The additions to the top of the “four pack” silos;
- The height of the terraces and residential flat building proposed to Edward Street; and
- The lack of provision of open space.

2.2 The Revised Concept Plan

The revised Concept Plan proposes the adaptive reuse of a number of existing industrial buildings existing on the site associated with the sites former use as a flour mill and the construction of new residential and ancillary retail spaces. The proposal seeks to redevelop the site as a mixed use residential, commercial and support retail development comprising:

- 280-300 dwellings (29,500-33,500m² GFA);
- 3,500-4,000m² commercial space;
- 2,000-2,500m² retail space;
- 8,400m² publicly accessible open space;
- A publicly accessible link to Lewisham West light rail stop in Stage 1;
- A six (6) storey built form adjacent to Longport Street instead of a ten (10) storey building as exhibited and reconfiguration of the building heights above the podium level;

- The ten (10) storey building has been setback into site away from Longport Street by 40m;
- Edward Street residential flat building, reduced from four (4) storeys to three (3) storeys;
- Deep soil landscape to Edward Street confirmed;
- The southernmost building adjoining the four pack silos increased from six (6) storeys to part 6/part 7 storeys;
- Part of the proposed covering of the Hawthorne Canal for the pedestrian link to the light rail stop has been deleted, to maintain the open channel as requested by Sydney Water;
- The basement car park to the east of the Hawthorne Canal setback a minimum of 1.0m from the canal;
- Owners consent has been granted by RailCorp for the removal of encroachments within the light rail corridor; and
- Development in four (4) stages with Stage 1 comprising public access to the light rail stop.



Figure 1: Plan showing location of revised building heights

3.0 Response to Key Assessment Issues

The submissions received have raised a broad range of issues relating to the proposed mixed use development of the Summer Hill Flour Mill site. The issue raised most frequently relates to traffic impacts and the ability of the surrounding network to accommodate the traffic generated by this development and the adjoining Lewisham Towers proposal. Related to the traffic generation are concerns regarding the impact of on-street car parking demand in the surrounding residential streets.

After traffic impacts the primary community concerns related to concerns over the excessive height of the re-used silos, particularly the proposed extrusions to the four pack silos and the ten (10) storey building adjacent to Longport Street. The concerns relating to the building heights relate to consistency with the local character and built form, privacy and overlooking and overshadowing.

The third grouping of concerns has related to the impacts of the proposal on community infrastructure such as schools, child care, medical facilities and open space provision.

The Concept Plan has been revised to address and respond to these issues and further detail has been provided to respond to the technical matters raised by the DP&I in the preliminary assessment and the matters are considered in further detail in the following sections.



Figure 2: Amended Concept Plan layout

3.1 Building Height and Form

A number of issues relating to the proposed building height and form were raised by DP&I and from the community during the consultation phase. The matters raised are addressed in the following sections.

3.1.1 Silo Heights

The key planning issues identified that the extension to the four pack silos was not supported on the basis of the visual impact on the surrounding area. It is considered that the proposed removal of the lift and blower structures from the top of this bank of silos and the provision of a three (3) level addition to the current maximum height is appropriate in the context. The silos are located deep into the site some 62.0m from Edward Street and 70.0m from Old Canterbury Road. The silos abut the light rail corridor which in this vicinity has a width of approximately 35.0 m. The silos are some 37-39m in height and are equivalent in height to 10-11 storey buildings. It is considered that in determining the relationship of the reconfigured silos and the new buildings long, medium and close range views must be considered.

A detailed analysis of the existing views to the existing silo structures from lands surrounding the site has been undertaken and is included at Attachment 3 of this report. For this analysis photographs have been taken from a variety of vantage points and locations surrounding the Summer Hill Flour Mill site. The photos have all been taken without any zoom and have included close, medium and long range views, particularly from with Summer Hill.

The analysis has considered the impact of the views to the proposed amended silos in the context of the gazetted Marrickville LEP 2011 (MLEP 2011). The Marrickville LEP 2011 permits buildings up to 32.0m along the alignment of the light rail line. The context and setting for the silos and the proposed buildings on the site can be expected to alter significantly from the current situation. Views to the silos from Lewisham and Old Canterbury Road will be very limited due to the building heights permitted under MLEP 2011.

The consideration shows that views to the silos from within Summer Hill are most apparent at longer distances from the site and are not considered to be obtrusive. This is demonstrated in Figures 6 and 7 for example when viewed from the west of the site in Old Canterbury Road. These longer distance views also have to be considered in the context of the building forms and heights that will be permitted within Lewisham under the Marrickville LEP 2011 which will form a backdrop to the silos and will place the silos in a context of taller buildings up to 32.0m in height.

The analysis also demonstrates that closer views towards the silos from within Edward and Smith Streets show that the contemplated low-rise perimeter development will predominantly screen the apparent height of the amended four pack of silos.

It is also noted that the six pack of silos that is located closer to the Edward Street frontage of the site will effectively be reduced in height through the removal of the hoist and blower structures from the top of this bank of silos.

The proposed heights of buildings in the PPR are considered appropriate as they reflect the scale of buildings already on the site, which have been a long term element in the visual landscape for over 40 years. The additional height occurs only to the four pack of silos and does not extend beyond the height of the existing hoist and blower structures atop these silos.

3.1.2 Longport Street Building

The Concept Plan as lodged proposed a building to the immediate south of Longport Street that contains ten (10) storeys adjacent to the Longport Street bridge, stepped down to a five (5) storey central element and stepping back up to a southern eight (8) storey element.

This configuration has been reviewed and it is now proposed that the building at Longport Street be a six storey building at the Longport Street frontage. The six (6) storey element of the building will comprise a podium on top of which will be a central ten (10) storey building and a nine (9) storey building to the south. This configuration sets the tallest elements well back from Longport Street and Carlton Crescent by some 40m. The provision of the six (6) storey height in this location also recognises the height differences between Longport Street at RL14.27m and the level of the land to accommodate the building which is at approximately RL10.9m. The podium is on land that is 3.3m lower than Longport Street, which is effectively a storey in height when viewed from Longport Street the building will read as a five (5) level building and accords with the 5-6 storey buildings contemplated for the adjoining McGill Street precinct in this area.

This modification responds to the concern that the building close to the entry into Summer Hill was too tall. The configuration conforms to the approach of seeking to provide tall buildings more centrally within the site and having low-rise buildings at the perimeter interfaces. This has been achieved by the setbacks of the buildings proposed and the northernmost six storey building being set back approximately 40m from the service station site at the junction of Smith Street and Carlton Crescent.

The revisions are considered to have responded to the concerns raised by the community and DP&I staff and provide a lower level interface at Longport Street that is commensurate with the height of development contemplated for the Longport Street frontage within the McGill Street precinct.

3.1.3 Edward Street Heights and Landscape Treatment

The building heights to Edward Street are proposed to be two (2) storey with attic rooms with the exception of building 5D. As lodged this building at the Edward Street frontage was a four (4) storey building and presented a narrow profile to Edward Street. The Concept Plan has been amended to provide this building as a three (3) storey building presenting to Edward Street. The two apartments removed from this building have been relocated to Building 3D which has been amended from a six (6) storey building within the submitted Concept Plan to be a part 6/part 7 storey building with the seventh level comprising the two apartments lost from the Edward Street building. These relocated apartments are located behind the existing light industrial building at the intersection of Old Canterbury Road and Edward Street and abut the light rail corridor. The additional level does not alter the acceptable impact of the proposal in relation to privacy, solar access and building height. This building will remain subservient to the adjoining four pack of silos.

The Concept Plan shows the Edward Street frontage has been clarified to confirm that setbacks are provided to the Edward Street alignment as shown on Section 5 and 6 of the amended Concept Plan drawings. The basement car park location clearly shows that a deep soil landscape perimeter to Edward Street is provided. Front entry courtyards will be provided to each of the dwellings to reflect the traditional ground level front door entry characteristic of housing within the neighbouring conservation area.

3.1.4 SEPP 65 Building Separations

Concerns were raised that the proposed building configurations and locations would preclude compliance with the recommended building separations within the Residential Flat Design Code (RFDC) supporting SEPP 65. The concern particularly related to the configuration and relationship of apartments within Building 5A, being the reconfigured six pack silos, Building 3A being the rebuilt timber silo and the dwellings within Building 3C being the adapted four pack of silos.

Pages 44 and 45 of the Concept Plan shows the internal layout of the two-bedroom apartments within the six pack silo building. Living rooms are accommodated within the new structure to the north of the bank of silos. The proposed balcony areas are recessed into the cylindrical forms and are configured such that any outlook to adjoining buildings within the development or on adjoining land are oblique views. This group of dwellings within the bank of silos effectively becomes part of the perimeter development created by buildings 5C, 5D and 5E. The central courtyard private open space area for this block provides the required level of separation recommended within the Residential Flat Design Code. These diagrams are reproduced below in Figures 1 and 2.

Figure 1 demonstrates that in the worst case a 20.0m separation is provided from balcony edge to balcony edge between the two (2) storey plus attic dwellings fronting Edward Street and the six (6) storey element behind the six pack of silos. The RFDC recommends separations between habitable rooms/balconies of 18.0m. This is readily achieved in the proposed layout.

Where the six pack of silos is separated by 8.0m from the rebuilt timber silo the internal layout demonstrates how the balcony of the silo apartment is off-set from this orientation and that the western wall of the re-built timber silo would not contain openings to habitable spaces.

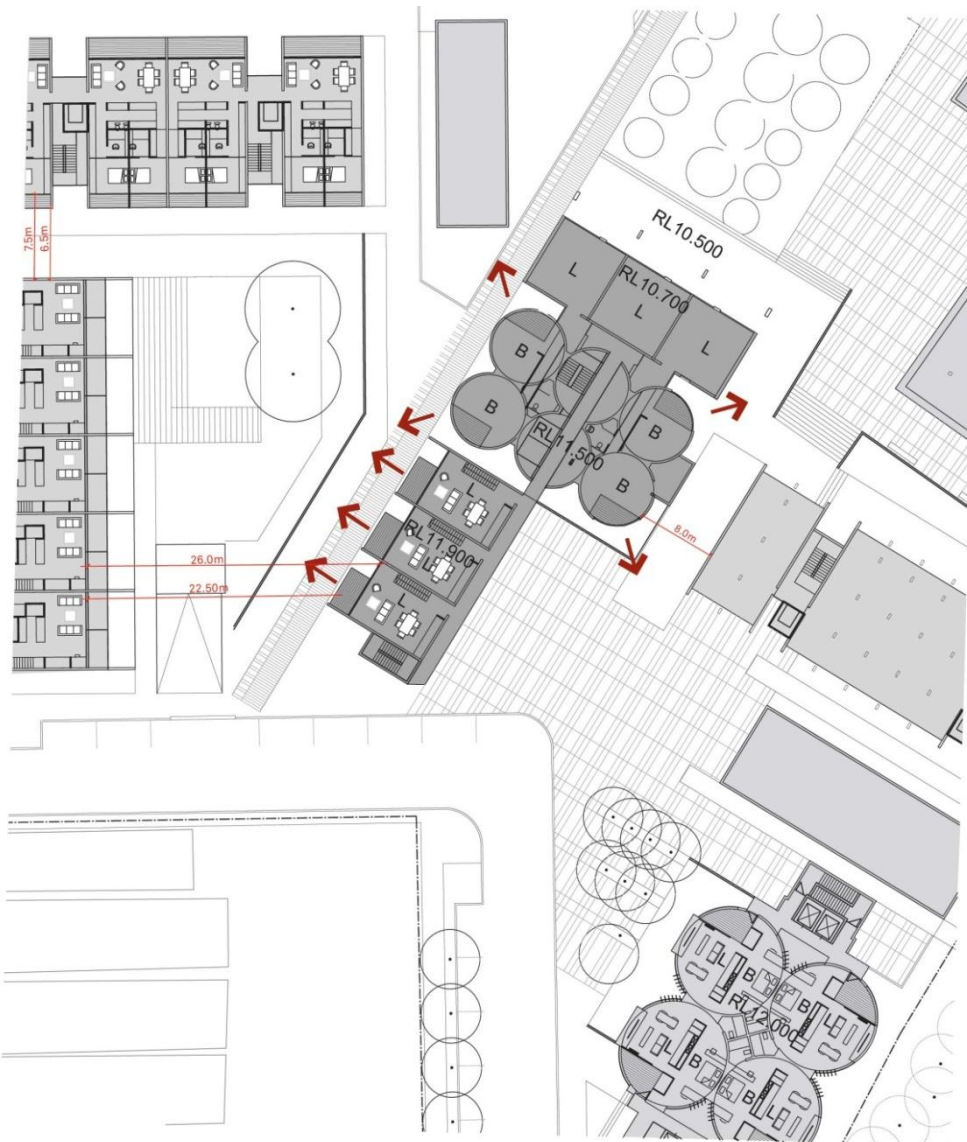


Figure 3: Internal separations between proposed dwellings

Figure 2 below demonstrates that the separation between the four pack silos proposed balcony edge and the southern elevation of the re-built timber silo is 22.0m. The RFDC recommendation for separations of habitable to non-habitable spaces is 18.0m. The separations are consistent with this guideline.

Figure 2 also demonstrates the separation between the balcony line of the seven (7) storey building to the south of the four pack of silos and the rear boundary of the properties fronting Edward Street to the immediate west. This setback is 14.8m. The RFDC recommends that the minimum separation between

buildings up to eight (8) storeys should be 18.0m between habitable rooms/balconies. This separation is typically shared between adjoin sites, with each site accommodating 50% of the separation. In this instance, 825 of the separation is accommodated on the site, resulting in no limitation on future development potential of these lands and ensuring more than adequate separation has been provided for.

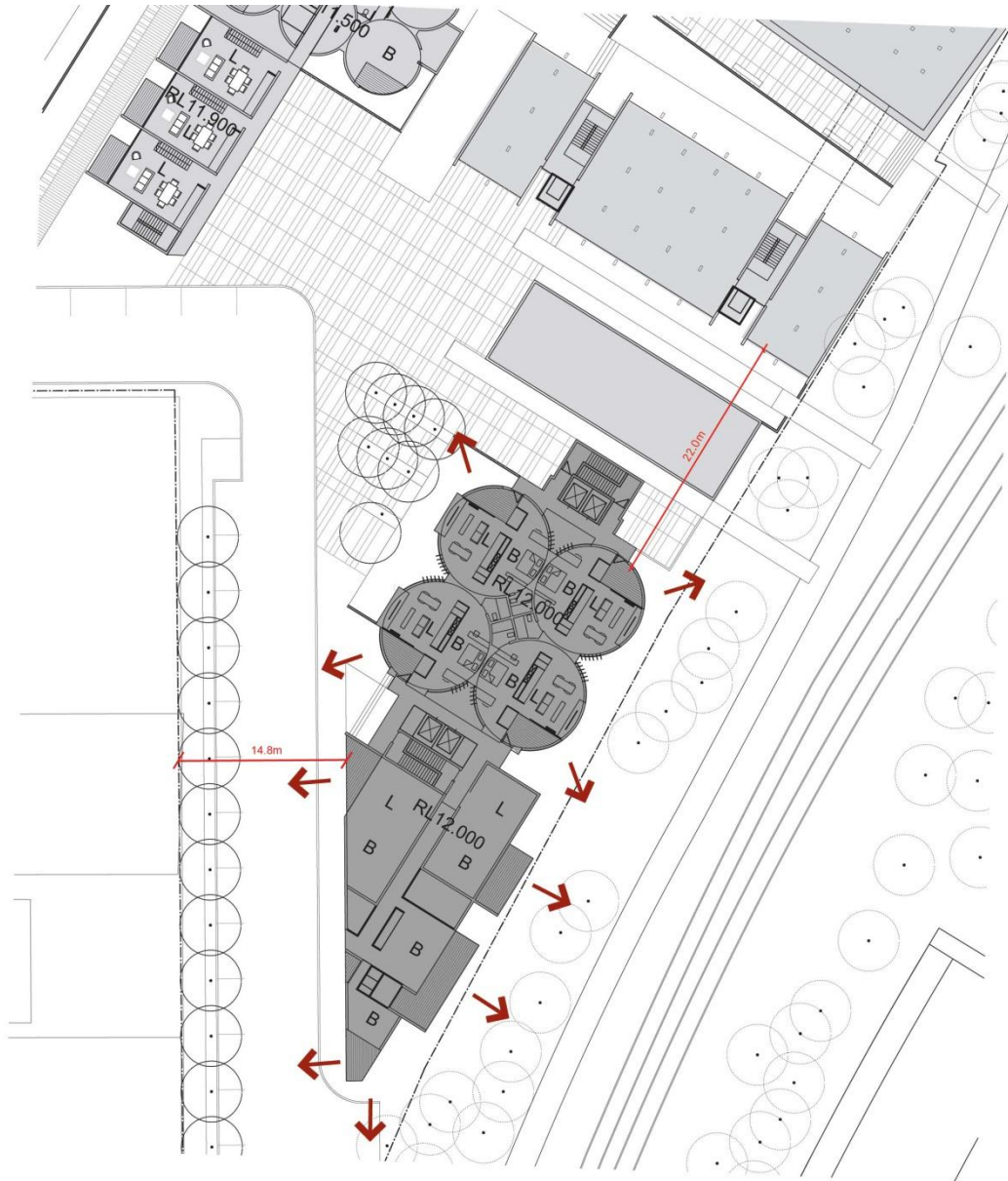


Figure 4: Internal and external separations

These diagrams further demonstrate that direct inter looking is avoided internally through the oblique orientation of the proposed dwellings within the silos.

The plans also show that openings in these apartments to the rear of the six pack of silos are not configured towards the existing dwellings at Edward Street to the immediate south of the subject site. This avoids overlooking to these properties to protect the privacy of these dwellings and minimises the need for openings oriented towards these properties. The southernmost element of proposed Building 5B is the stairwell element which would be enclosed and not require any window openings.

Similar to the approach of the six pack of silos, the balconies for the four pack of silos are to be inserted into the cylindrical form to provide the private open space. These balcony areas are angled to avoid direct overlooking of existing and proposed dwellings. The western face of the silos is set back approximately 18m from the boundary of the properties fronting Edward Street which is the recommended minimum distance between buildings of up to eight (8) storeys in height contained in the Residential Flat Design Code.

The ability of the Concept Plan layout to accord with and achieve SEPP 65 compliance in future Development Applications for each stage has been demonstrated.

3.2 Traffic, Transport and Car Parking

Additional traffic modelling has been undertaken by ARUP and the results are provided at Attachment 4. The additional traffic modelling has been independently reviewed and audited by consultants engaged by DP&I.

The revised traffic assessment undertaken by ARUP at Attachment 4 includes a detailed staging program for the provision of new traffic lights at the junction of Edward Street and Old Canterbury Road, a roundabout at Edward and Smith Streets and the installation of traffic control measures in Smith Street.

As requested, substantial additional traffic and transport assessment has been undertaken to consider the impact of the proposed development of the Summer Hill Flour mill site both in its own right and as a combined impact with the Lewisham Towers proposal in the adjoining McGill Street Precinct.

This additional assessment has included:

- Additional traffic modelling;
- Consideration of the need for micro-simulation modelling on the local street system;
- Consideration of alternative options to the proposed local road link onto Old Canterbury Road;
- Identification of the treatment of the local streets in the development to create a low speed environment;
- Consideration of Light rail “kiss and drop” facility and disabled parking;
- Provision of reduced car parking provision for non-residential uses to minimise traffic generation;
- Consideration of additional car share spaces or other measures to discourage private vehicle use;
- Analysis of off-site linkages for walking and cycling which should include consideration of public domain upgrades; and
- Staging of any traffic works to be undertaken.

The additional traffic modelling undertaken has been independently audited as required by the Department. This analysis has considered the impact of the proposed installation of traffic lights at Canterbury Road and Edward Street. The consideration has also concluded that micro-simulation modelling is not necessary in this instance.

The assessment has confirmed that:

- A new access to Canterbury Road is no longer being pursued;
- A range of treatments are proposed, such as medians, will be included to ensure a low speed traffic environment is provided on site;
- Two disabled on-street car parking spaces have been nominated;
- Kiss and drop zones have been identified;
- Two car share parking spaces on street have been identified; and

- It is proposed that the applicable car parking rates for the commercial component be reduced by 25% of the relevant Council DCP requirement and that the retail car parking requirements be reduced by 50% of the relevant Council DCP requirement in recognition of the site's high public transport accessibility.

In relation to upgrades of pedestrian and cycle linkages a detailed analysis has been undertaken and a priority list of works identified. It is proposed that the Statement of Commitments be revised to include the undertaking of these works as part of Stage 1 of the development.

The traffic assessment also identifies that at Stage 1 the required works should include:

- The internal road connection between Edward and Smith Streets with left in and left out arrangements; and
- Installation of the roundabout at Edward and Smith Streets.

For Stage 3 it is recommended that the signalisation of the Edward Street and Canterbury Road intersection should be in place prior to the occupation of Stage 3.

The Statement of Commitments has been amended to reflect these matters.

3.3 Land Use

Matters to be addressed relating to land use included a request that consideration of the quantum of retail space proposed be undertaken and opportunities to increase employment opportunities on the site be explored. This is in recognition of the identification of the part of the site within the Ashfield Council as Category 1 Industrial Land in the Inner West draft Subregional Strategy. Consideration for the opportunity for the provision of social infrastructure needs for the future population was also requested.

3.3.1 Retail Floor Space

The Concept Plan as lodged contemplated a provision of 2,500 to 2,800 m² of retail space. This retail space is not located in a single building or location. The intended provision of retail space is for the provision of active uses to the public thoroughfares through the site to maximise the amenity and safety of these spaces.

The quantum of retail space is proposed to be divided between seven locations being:

- Buildings 4A and 2C which frame the entry into the site from Smith Street;
- Building 1C and 2A (the Mungo Scott building) which are located adjacent to the link through the site to the light rail station;
- Building 5E (former amenities block building); and
- Building 3B and 5E which front the light rail corridor and the proposed urban plaza to the north of the six pack of silos respectively.

The intention of the proposed retail areas is to accommodate active uses such as cafes and convenience retail that would cater for the needs of residents, workers and commuters who would visit the site. There is not a single allocation of potential retail space which will be large enough to accommodate a supermarket.

Furthermore none of the proposed spaces have suitable servicing arrangements that would accommodate a supermarket use such as capacity for large loading docks. The formulation of the Concept Plan has never and does not seek inclusion of a supermarket. Additionally none of the spaces would exceed 200m² in area.

The amended Concept Plan now proposes 2,000-2,500m² of retail space. The updated Economic Impact Assessment (Attachment 5) has indicated that approximately half of these spaces would be for food related

uses such as restaurants and cafes. The updated Economic Impact Assessment has concluded that the proposed retail component of the subject development would meet only 8.6% of the expected growth in expenditure projected for the period 2009-2021 which is a modest contribution and will not impact upon the role of existing centres in the local area.

The updated Economic Impact Assessment has also considered the retail impact of the subject development operating in conjunction with the adjoining proposal at 78-90 Old Canterbury Road, Lewisham (Lewisham Towers). The assessment again concludes that with the removal of the supermarket and the majority of the retail space from the Lewisham Towers proposal, the combined developments will not adversely impact upon the viability or hierarchy of existing centres.

The retail space proposed within both developments will predominantly service demand generated by residents and workers. The existing established centres such as Summer Hill, Leichhardt Marketplace and Ashfield will continue to accommodate higher order retail demand requirements as envisaged in the centre hierarchy under the Metropolitan Plan for Sydney 2036.

3.3.2 Commercial Floor Space

The Concept Plan as exhibited proposed a mix of retail and commercial uses within the Mungo Scott building with an option for a small quantity of residential accommodation within the roof space. The amended Concept Plan has removed all residential accommodation within the Mungo Scott building. This increases the employment generating space available in the development to between 3,500 and 4,000m². The revised economic impact assessment has estimated that the combined retail and commercial floor space has the potential to generate approximately 215 full-time jobs compared to 49 employment positions in the former mill and 75 administration staff in the office building.

The removal of the residential space within the Mungo Scott building also simplifies the conversion of the building and reduces the potential need for intervention to the building fabric to accommodate residential uses when compared to the use of the building for commercial purposes.

The amendment to the Concept Plan increasing the proportion of commercial space within the Mungo Scott building is considered a positive response and outcome in terms of the provision of employment opportunities on the site as well as assisting in the management of the heritage significance of the Mungo Scott building.

3.3.3 Community Facility and Social Infrastructure

The Concept Plan as exhibited provided for significant community facilities and social infrastructure. This included the provision of 8,400 m² of publicly accessible open space which will provide for passive and active recreation spaces in both a landscaped setting and within an urban plaza. The spaces are framed by proposed active retail uses such as restaurants and cafes and have excellent north facing aspect. In addition to the recreation opportunities afforded by the layout, the open space and street network proposed provides a series of linkages through the site from Smith Street and Edward Street to facilitate access to the proposed light rail stop adjacent to the Mungo Scott building. These facilities will also provide access onto the future Greenway proposed to run parallel with the light rail line.

In reviewing the Concept Plan it has been identified Building 5E (the former amenities building) is in a location and setting that could be suitable for a 30 space childcare centre. This building is located within proposed Stage 2 and if appropriate commercial interest is demonstrated could be included as part of detailed Development Application planning of Stage 2 to provide a childcare centre.

The provision and planning for associated potential needs such as schools and hospitals are matters that cannot be accommodated or addressed by a development proposal such as this. These are clearly matters for State Government to manage and consider.

3.3.4 Affordable Housing

Concern was raised that the development was not providing affordable housing options and contributions. While affordable housing is not specifically provided the development proposes significant contribution to public amenity and infrastructure and a range of housing choice through the provision of a variety of dwellings ranging from 1 bedroom dwellings through to 3 and 4 bedroom dwellings in a variety of styles and configurations. The proposal will also deliver a heritage outcome for the retention and re-use of a significant number of buildings and spaces on the site, and will provide 34% of the site as accessible public open space.

Significant and attractive linkages to the new public transport amenity of the light rail have been incorporated and the upkeep of these publicly accessible facilities will be retained. Therefore the ongoing cost of these public benefits are not transferred to the Community that will utilise them despite the public benefits afforded. These positive outcomes are proposed with a relatively low development yield (FSR 1.4:1-1.6:1). The capacity for the development to also quarantine further space for affordable housing is not viable in this instance. The other significant benefits provided must be taken into context in this instance.

A reasonable comparison can be drawn between the subject site and the adjoining McGill Street precinct, where half of the precinct has been earmarked to provide additional open space and the balance of the precinct will contribute to affordable housing. No single site in McGill Street is proposed or expected to provide open space and affordable housing. The provision of public access open space and heritage retention is considered to be significant and appropriate.

A further restriction requiring affordable housing provision is not viable in this context

3.4 Staging and Infrastructure Delivery

A reconsideration of the staging implementation was requested particularly in relation to the timing of the provision of open space linkages to the light rail and traffic management measures. This further consideration was requested to ensure that community benefits such as public access were delivered as early as possible to the proposed light rail station.

3.4.1 Project Staging

The staging plan lodged with the Concept Plan as exhibited proposed the provision of access through to the light rail stop adjacent to the Mungo Scott building within Stage 3 and the delivery of the landscaped open space dominated by the current avenue of trees off Smith Street in Stage 4.

The staging plan has now been amended to include the creation of the access through to the light rail stop within Stage 1. Stage 1 is now configured to provide publicly accessible linkages through the site from Edward Street and from Smith Street. To provide an attractive and functional linkage, Stage 1 now includes Building 1C and Building 2B which will include low scale retail uses to frame the access pathway and provide activity close to the light rail stop at the earliest stage possible.

Stage 1 also includes the new street off Edward Street that links back through to Smith Street and requires the implementation of the traffic management matters identified in the Traffic and Transport assessment.

The urban plaza to be created by the demolition of the bank of metal silos will be delivered as part of Stage 3. Stage 3 includes the redevelopment of the six pack and four pack of silos as well as the Mungo Scott building. This stage includes public open space plazas to the north and south of the six pack silos as well as a new street behind the Edward Street properties. This new street does not link through to Old Canterbury Road for vehicle traffic. Prior to the occupation of Stage 3 the signalisation of the Edward Street and Old Canterbury Road intersection is required.

The avenue of brush box trees and the landscaped setting which frames the original site access from Smith Street would be delivered as part of Stage 4 and which includes the largest concentration of residential dwellings.

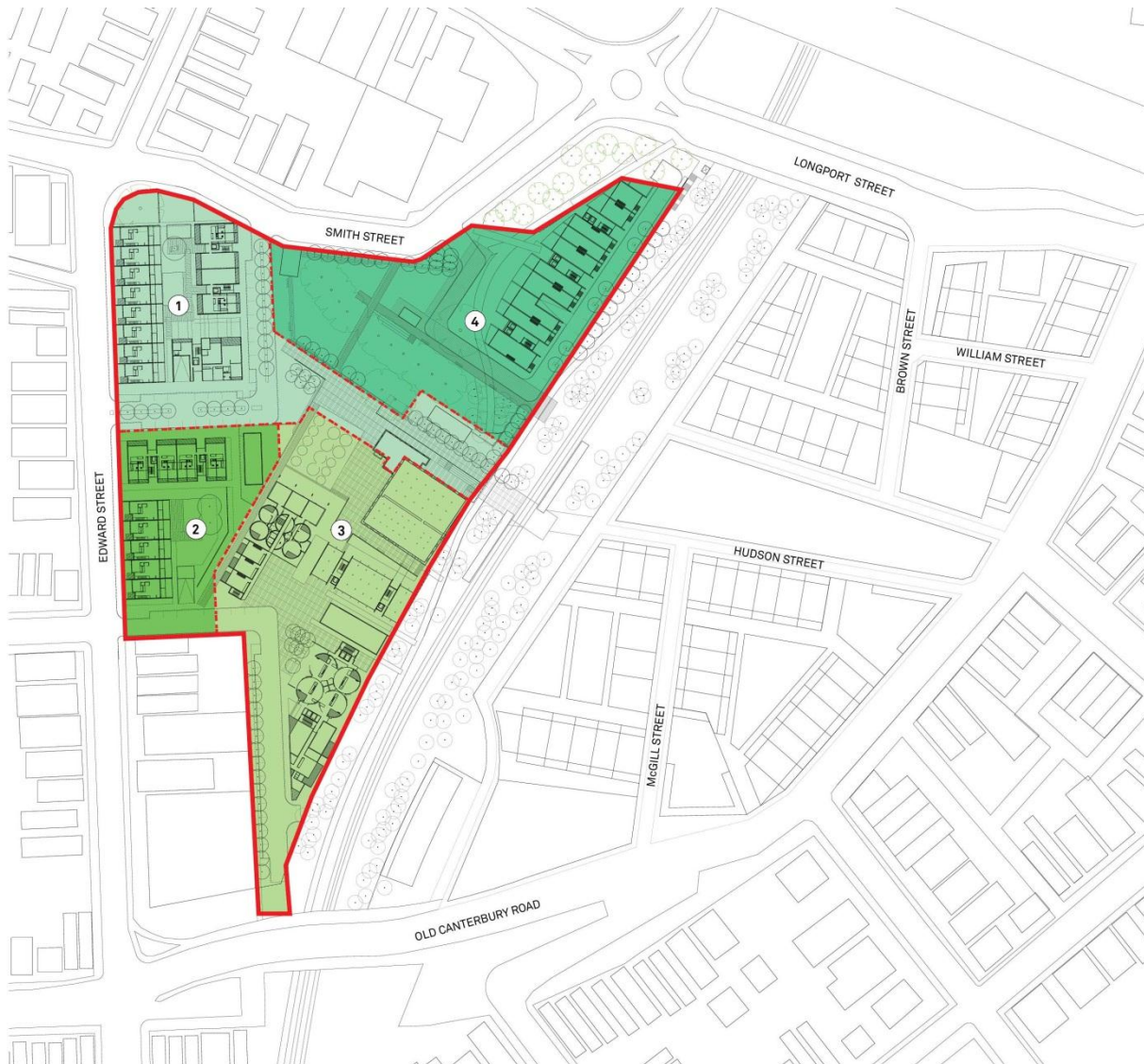


Figure 5: Amended staging plan

3.4.2 Public Access and Ownership Arrangements

It is proposed that the two new roads that provide access into the site from Edward Street will be dedicated to Ashfield Council as public roads. Having these roads as public roads will ensure that time-limited car parking restrictions are able to be signposted within these areas to ensure adequate turnover of on street car parking to the benefit of future retail and commercial spaces within the development. This would also preclude these spaces from becoming long-term commuter parking to the detriment of this development and existing residents in surrounding streets. The new access from Smith Street into Building 1A will remain as a private street due to the non-traditional method of construction to cross the Hawthorne Canal. This access will therefore remain the responsibility of the body corporate of the development.

It is proposed that the urban plazas and the landscaped open space and access paths be granted easements for public access to the benefit of Ashfield Council. This is in response to Council's concerns over

the ongoing cost for the maintenance of the spaces. This approach will still deliver benefit to the community with a public right to access and use the spaces for recreation purposes and for access through to the light rail corridor and the future Greenway but minimise any additional cost to Council as ongoing ownership and maintenance would be the responsibility of the owner of the land. The private street within Stage 4 that abuts the light rail corridor would be granted easements for access to the benefit of Marrickville Council so that public access is facilitated from the street as a connection where appropriate to the future Greenway and pedestrian cycle way.

The details of each easement will be provided within detailed Development Applications to be prepared and lodged for each stage.

3.5 Light Rail Interface

Clarification has been requested in relation to co-ordination between RailCorp and the Department for Transport relative to the location of the Lewisham West light rail stop and the need for owner's consent for works within the rail corridor.

3.5.1 Light Rail Stop Location

The preparation of the Concept Plan involved significant negotiation and liaison with RailCorp and Transport for NSW prior to the lodgement of the Concept Plan. This included numerous discussions regarding the relocation of the light rail stop from the originally intended location at the Longport Street bridge to the location now proposed between the open space provided on the subject site and the open space to be created through the future widening of Hudson Street within the Marrickville Council area. The Preferred Project for the Inner West Light Rail (MP10-0111) included relocation of the light rail stop for Lewisham West at the location indicated within this Concept Plan adjacent to the Mungo Scott building.

3.5.2 Owners Consent

Owners consent has been provided from RailCorp for the proposed demolition of the encroachments into the light rail corridor that are fixed to the Mungo Scott building. This consent is provided at Attachment 8.

Further title searches undertaken in relation to the proposed pedestrian bridge access to Longport Street have identified that this land is in fact road reservation located within the Marrickville local government area. As part of a future development application for Stage 4, an application under Section 138 of the *Roads Act 1993* will be lodged for the construction of the pedestrian access to Longport Street. The application would be lodged with the Roads and Maritime Service (RMS) as Longport Street in this area is gazetted road number 2028 and is classified as a Regional Road (GG 7 22/1/93).

3.6 Greenway Interface

The DP&I requested that consideration be given to the potential deletion of the internal access road in Stage 4 that runs parallel to the Greenway to potentially soften the interface between the site and a future Greenway.

The interface has been reviewed and the access road is proposed to be retained. The retention is proposed to support the casual surveillance of the light rail corridor in this locality which will be a far more urbanised environment centred around a light rail stop than most other locations along the corridor.

With the redesign of Building 1A to create a six level podium structure, the lower level dwellings have been reconfigured to be two (2) storey dwellings, each with an individual private entry from the access way. Further as shown in Section 7 of the Concept Plans at page 39, the treatment of the internal street accommodates street planting to augment future planting within the Greenway. The concept includes the provision of access from within Stage 4 to the Greenway and the related future pedestrian/cycleway linkages.

It is considered from an urban design consideration that the dwellings should face onto the proposed Greenway in this area recognising the importance of providing casual surveillance. With the interface to the Greenway being the front door of the dwellings the amenity and safety of the corridor in this location is reinforced. This is the most appropriate urban design response.

4.0 Response to Submissions

The PPR has sought to respond to the issues raised to the proposal both through the public exhibition, agency consultation and matters raised by the DP&I. The preparation of the PPR has been informed by the review of public and agency submissions, discussions with relevant agencies, particularly RMS, RailCorp, Sydney Water and the DP&I.

In addition to the formal public notification process, four separate community briefing sessions were held, as well as the establishment of a 1800 information line, project website, distribution of newsletters and media and display advertising taken out in local newspapers. The detail and results of these additional undertakings is provided in the Community Consultation report prepared by Urban Concepts that is included at Attachment 7.

As detailed in the accompanying revised Concept Plan documentation the scope of the proposal has been refined, particularly in relation to the reconfiguration of the northern most building adjacent to Longport Street providing a six (6) storey presentation instead of the original ten (10) storey interface.

The Edward Street terraces have been confirmed to provide deep soil landscape setbacks and the four (4) storey element proposed has been reduced to a three (3) storey building.

All residential accommodation has been removed from the retained Mungo Scott building to maximise employment generating potential for this building and it has been confirmed that the retail space provided does not and will not accommodate a supermarket.

Consistent with Sydney Water's requirements the extent of proposed covering of the Hawthorne Canal has been amended to retain an open channel where an open channel exists.

The timing of the delivery of traffic management upgrades has been confirmed requiring the Edward and Smith Street connection as part of Stage 1 along with the associated roundabout and traffic access measures. The signalisation of the Edward Street and Old Canterbury Road intersection has been confirmed as required prior to the occupation of Stage 3.

The staging of the proposal has been revised to ensure public access to the light rail stop is provided as part of stage 1 in conjunction with the implementation of the identified upgrades of pedestrian access facilities in the area

4.1 Response to Agency Submissions

The issues raised in the agency and council submissions are addressed in the following table.

Agency	Response
Ashfield Council	
Visual analysis	Council's SIMURBAN model has not been utilised as information to assess the visual impact has been provided through a physical site model, photomontages, and numerous architectural plans.

Agency	Response
	A further analysis of the visual catchment has also been undertaken at Attachment 3 to this PPR.
Impact of six storey buildings on Edward Street	As detailed at Attachment 3, the perimeter two (2) storey plus attic forms will screen much of the view to the silos and therefore also the six (6) storey buildings. The provided information demonstrates that the buildings will not result in overshadowing or privacy and that the RFDC rules of thumb are achieved for these buildings in regards to physical separation to adjoining buildings. This screening will equally apply to the four (4) and six (6) storey buildings provided internally to the site when viewed from the adjoining and surrounding areas.
Impact of the eight (8) and ten (10) storey building in Marrickville (the Longport Street buildings)	This building has been amended to provide a six (6) storey podium and a six (6) storey form to Longport Street instead of the originally proposed ten (10) storey building. This building needs to be considered in the context of the Marrickville LEP 2011 which will allow buildings of up to 32.0m (9–10 storeys) in height on the immediately adjoining land.
Edward Street setbacks	The two (2) storey plus attic buildings proposed for Edward Street provide for a 1.8m deep soil setback that is clear of the basement. The building and glazing line is setback to 3.6m allowing for landscaped entry courts to be provided. This approach reflects the pattern of development opposite the site providing landscape entries to the front entries of these dwellings.
Edward Street footpath widths	The Edward Street pavement and verge width is the existing condition, which could be augmented to provide street tree bays if necessary. This is considered to be an appropriate approach as the new internal road network accommodates the majority of access movements and all access to basement car parks.
Affordable housing	<p>The proposal has delivered a heritage outcome for the retention and re-use of a significant number of buildings and spaces on the site, and will provide 34% of the site as accessible public open space. Significant and attractive linkages to the new public transport amenity of the light rail is provided and the upkeep of these publicly accessible facilities will be undertaken so as not transfer the burden to the community despite the public benefits afforded.</p> <p>These positive outcomes are proposed within a relatively low development yield (FSR 1.4:1-1.6:1).</p>

Agency	Response
	<p>The capacity for the development to also quarantine further space for affordable housing is not viable in this instance. The other significant benefits provided must be taken into context in this instance.</p> <p>A reasonable comparison can be drawn between the subject site and the adjoining McGill Street precinct, where half of the precinct has been earmarked to provide additional open space and the balance of the precinct will contribute to affordable housing. No site in McGill Street is proposed to provide open space and affordable housing. The proposed contribution to public access open space and heritage retention is considered to be significant and appropriate.</p> <p>In addition the proposal adds to the range and variety of housing choice as well as providing employment opportunities in a location that is well served by transport options.</p> <p>A further restriction requiring affordable housing provision is not viable in this context.</p>
Accessible design	<p>Accessibility has been a driving factor of the site layout to provide accessible access through the site to the light rail. The layouts and building locations do not preclude accessible dwellings being provided in future Development Applications for each stage.</p>
Heritage Conservation	<p>The site and buildings do not currently have any heritage status that would warrant the preparation of a Conservation Management Plan. The provision of detailed measured drawings is also considered excessive and pre-emptive and are matters more appropriately provided with the lodgement of future Development Applications as the Concept Plan, if approved, will not facilitate the undertaking of any construction or building works.</p> <p>Listing of the landscape items and structures of heritage significance are matters that can readily be addressed in the preparation of the Ashfield Comprehensive LEP.</p> <p>The Concept Plan has been prepared having regard to the heritage potential of the buildings and supported by heritage impact assessments. The Concept Plan proposes to retain the mill building, silos, amenities building, sub-station, and landscaped elements and has interpreted the weighbridge through the location of the second access into the site from Edward Street in this area.</p>

Agency	Response
Flora and fauna and contamination	<p>These matters have been addressed in the EA lodged at Attachments 11 (Flora and Fauna Assessment), 12 (Target Long-Nosed Bandicoot Survey) and 13 (Detailed Environmental Site Assessment).</p>
Statement of Commitments	<p>The submission raised a number of specific matters relating to the Statement of Commitments which area addressed below.</p> <ul style="list-style-type: none"> • External traffic management will be constructed, as demand requires as detailed in the PPR Traffic and Transport report prepared by ARUP (Attachment 4) and not all at Stage 1 of the development. These works will be undertaken in accordance with the requirements of RMS the relevant roads authority for these structures • Conditions relating to restoration of damage to local streets would be relevant matters for condition on future Development Applications for each stage given the Concept Plan will not authorise any construction works to be undertaken • Upgrading of stormwater infrastructure generated by the development would be matters to be addressed at future Development Application stage. The proposal should not be required to upgrade upstream infrastructure upon which no demand is placed by the proposed development. The reports prepared in support of the Concept plan identify that a range of solutions and management options are available to address these matters in detail within future Development Applications. • Internal streets and paths will be designed to the relevant Australian Standards for public road access. Service vehicles will have to traverse Smith and Edward Streets to access the site. The provision of new internal streets has been identified in the updated staging plan. Not all new streets will be provided in stage 1. • A flood management strategy has been prepared by AAP and is included in Attachment 6 of the EA. Detailed design addressing stormwater management and flooding will be required to be provided with each subsequent Development Application for

Agency	Response
	Stages 1 to 4.
Staging Plan	The staging has been amended to ensure the delivery of access to the light rail is provided in Stage 1. This includes the construction of the new street linking Smith and Edward Streets to service the proposed dwellings in the vicinity of the current administration building at the corner of Edward and Smith Streets.
Resolution of details prior to future project Application or Development Consent determinations	No works can be undertaken without the lodgement of further Development Applications which will involve input from Council for assessment and determination by the relevant Council.
s94 payments	The statement of Commitments includes an undertaking to make s94 contributions in accordance with Council's s94 Plan.
Supermarket	No supermarket is proposed in the development nor is there a sufficient sized area of retail space that could accommodate a supermarket. Further, there is no area that could be serviced by delivery vehicles required to operate a supermarket. The retail spaces are a maximum of 150-200m ² in area well below the requirements of a supermarket operation.
Dedication of open space	The proposal is to dedicate to Council a right of access granting permanent access though the site and to access and utilise the open space areas to the benefit of the community. This will be delivered in stages as detailed in the revised staging plan noting that access to the light rail through the site is proposed as part of Stage 1.
Silo additions	The heritage assessment lodged with the EA does not oppose the addition to the silos on heritage grounds. Detailed consideration of the impact of the additions is provided in this PPR.
New access to Old Canterbury Road	This proposed access has been deleted from the amended Concept Plan
Identification of garbage collection points	These details would be addressed and provided in future Development Applications.
Commuter parking for the light rail	There is no intention to provide commuter parking for the light rail. The light rail is an independent project. If commuter parking is required or intended to be provided then the light rail proponent should be responsible for its provision. The proposal does provide for kiss and ride drop of capacity within the

Agency	Response
	proposed new streets.
Open space maintenance	There is a conflict between Council's desire for the land to be dedicated but for the maintenance of the land to remain with the owner of the site. This conflict is avoided by the proposal to maintain ownership but to grant public access to the space with Ashfield Council benefitting from the easement.
PAC assessment	The composition of the PAC to determine the application and if the assessments are undertaken concurrently are matters for the PAC to address.
Detailing of architectural vocabulary	The Concept Plan provides guidance for the development and theme of the future development. Future stages will be the subject of detailed design development and assessment and will include detailed design resolution. Decisions on materials and finishes will be provided within future Development Applications and will be subject to the approval of the relevant Council.
Marrickville Council	
Zoning	The zonings applying to the land do currently prohibit the proposed development. The permissibility of the development is being addressed via the Concept Plan application.
Urban Design	Council has indicated that it is generally supportive of the urban design, subject to design refinement through subsequent applications and stages.
Dwelling Mix	The detailed allocation of dwelling types has not been finalised and will be addressed in subsequent Development Applications for each stage. The proposal demonstrates broad mix of dwelling types and sizes and the inclusion of studio apartments is not precluded from being provided in these future applications.
Transport, Traffic and parking	<p>The traffic impact assessment has been undertaken as required by RMS and the consultants engaged by DP&I to provide assessment advice to the Department. The revised assessment has concluded the proposal should be approved subject to the implementation of the measures identified.</p> <p>The provision of additional car share spaces in on-street locations has been included.</p> <p>The staging plan has been revised to provide the public access to the Greenway and light rail stop as</p>

Agency	Response
	part of Stage 1. The pedestrian access to Longport Street is now known to be not over RailCorp land but over road reserve land. This access would be provided as part of Stage 4.
Bicycle parking	Provision of bicycle parking can be detailed at Development Application stages to Council's requirements.
Waste collection	These details would be addressed and provided in future Development Applications.
Economic impacts upon existing centres	Council's concerns related to the cumulative impacts of the subject application and the Lewisham Towers proposal that included significant areas of retail space. The Lewisham Towers proposal has been amended to significantly reduce the quantum of retail space proposed. The revised Economic Impact Assessment provided at Attachment 5 to this PPR identifies that the proposed levels of service retail can be accommodated without adverse impacts to existing centres.
Community service provision	<p>The proposal delivers significant community facilities in the form of direct provision of 8,400m² of open space and access to the future Greenway and light rail. The urban plaza areas have the potential for the utilisation of a variety of community uses and events. The revised Concept Plan has considered the potential for the former amenities building to be utilised as a childcare centre which could be further resolved through subsequent stages of the development.</p> <p>In addition to the direct provision of the open space and public access to 34% of the site the applicant has committed to paying s94 contributions in accordance with Council's plans. The proposal is therefore delivering directly open space, public access and a cash contribution as well as the on-going maintenance of the open space areas.</p>
Developer contributions and VPA	As stated above the project will directly provide 34% of the site as open space and public access, maintain these areas and has committed to the payment of s94 contributions in accordance with Council's plans. The pedestrian facility upgrades identified in the Traffic and Transport Assessment (Attachment 4) will be provided as part of Stage 1. Further contributions are not considered justifiable in this instance given the significant benefits proposed to be directly provided.

Agency	Response
Affordable Housing	Refer to the response to Ashfield Council above.
Local Flooding	<p>A flood management strategy has been prepared by AAP and is included in Attachment 6 of the EA.</p> <p>As confirmed in Attachment 6 of this PPR detailed design addressing stormwater management and flooding will be required to be provided with each subsequent Development Application. The strategy provides the framework for these future applications to be prepared and assessed.</p> <p>The 2D modelling of the site undertaken by Sydney Water confirms the understanding of the flood impacts on the site arising from the modelling undertaken for this Concept Plan application. The detailed design resolution has been confirmed to be capable of being addressed at detailed Development Application stage. Further modelling of the catchment addressing the impacts of the development in the light rail corridor or other nearby lands is not appropriate or required at this stage.</p>
Long- Nosed Bandicoot	<p>Updates of the environmental assessments will be required with future Development Applications for each stage in the development.</p> <p>The assessment has recommended the provision of a landscape theme on the site that supports habitat and foraging opportunities for the Long-Nosed Bandicoot.</p>
PAC assessment of the application	The makeup of the PAC to determine the application and the adjoining Lewisham Towers application will be a matter to be addressed by the assessment and determination authorities.
Transport NSW	
Reduced car parking	The Concept Plan has been developed to accord with the car parking requirements of Ashfield Council. The application is a Transit Oriented Development and is seeking to provide residential and employment uses in a location that is well served by current and future public transport facilities. The development and site location attributes encourage the use of public transport options for regular trips such as commuting but provide levels of car parking for car storage for the use of private vehicles outside peak times when public transport options are most attractive. In recognition of these factors the revised Traffic and Transport assessment proposes reduced

Agency	Response
	<p>car parking rates be applied in relation to the required retail and commercial generated car parking provision.</p>
<p>Light rail access</p>	<p>Owners consent for the demolition of the sidings has been provided by RailCorp and the Longport Street access has been clarified as an access to a public road. Kiss and ride and disabled car parking at grade in proximity to the light rail stop are proposed to be accommodated within the new streets.</p>
<p>Conditions</p>	<p>The requested conditions are appropriate for inclusion in any determination.</p>
<p>Sydney Water</p>	
	<p>Sydney Water's requirements for the retention of the Hawthorne Canal as an open structure where it is currently open have been accommodated, as have setbacks of the basement car parks from the canal structure.</p> <p>Detailed flood modelling is being recommended that takes into consideration the McGill Street precinct potential development, the Lewisham Towers proposal and the implementation of the light rail. This approach is seeking to have the affected downstream property (the subject site) address and manage water delivered to the site principally from the lack of capacity in Sydney Water's Hawthorne Canal where it traverses under the light rail alignment.</p> <p>The approval of the light rail requires engineering investigation and design that does not worsen the flooding impacts on adjoining lands (including the subject site).</p> <p>This Concept Plan has been prepared with management strategies and approaches included in the Statement of Commitments requiring detailed assessment and consideration of flood impacts with each stage.</p>
<p>RailCorp</p>	
<p>Land Owners Consent</p>	<p>Land owners consent for the demolition of the encroachments into the rail corridor has been sought and a copy of the consent is included at Attachment 8.</p> <p>Further title searches have identified that Lot 1 in DP 900501 has legal access directly to Longport Street</p>

Agency	Response
	(Road plan 13814-1603). Future Development Applications will be accompanied by an application under Section 138 of the Roads Act 1993 to the RMS as the relevant authority for the classified road for the formalisation of this access to the public road.
Car parking and promotion of Public Transport	<p>The Concept Plan has been developed to accord with the car parking requirements of Ashfield Council. The application is a Transit Oriented Development and is seeking to provide residential and employment uses in a location that is well served by current and future public transport facilities. The development and site location attributes encourage the use of public transport options for regular trips such as commuting but provide levels of car parking for car storage for when public transport options are most attractive.</p> <p>The revised Traffic and Transport Assessment proposes the implementation of reduced car parking rates for the retail and commercial floor space provided in recognition of the sites accessibility to public transport.</p>
Future Development Applications	The required documentation to address the concurrence provisions of SEPP (Infrastructure) 2007 will be provided.
NSW Office of Water	
Groundwater encountered at borehole 6.	As identified at Attachment 7 of the EA, groundwater was encountered in borehole 6 at a depth of 3.9m. This borehole location is to the west of the Mungo Scott building and in a location where no basement car parking is proposed.
Vegetated riparian setback to the Hawthorne Canal	The Statement of Commitments includes a recommendation that the proposed landscape treatment of the site provide habitat and foraging opportunities for fauna, including the Long-Nosed Bandicoot.
Roads and Traffic Authority (now RMS)	
Request for TRANSYT modelling	This has been undertaken in consultation with the RMS and the results independently reviewed. The review and audit has determined that the proposal can be approved.
Micro-simulation modelling	Further modelling has been undertaken in accordance with the requirements of the peer review traffic consultant engaged by DP&I and the results

Agency	Response
	<p>are included in the revised Traffic and Transport Assessment at Attachment 4.</p> <p>The assessment specifically identified that due to the nature of the surrounding street network being an extension to the local precinct that there is no benefit in undertaking micro-simulation modelling.</p>
New access to Old Canterbury Road east of Edward Street	This proposed access point has been deleted from the revised Concept Plan consistent with the desire to avoid additional access points onto the classified road network.
Conditional matters	The conditional matters detailed in the submission are all capable of being accommodated within each Development Application for each stage.
Leichhardt Council	
Affordable Housing	<p>The proposal has delivered a heritage outcome for the retention and re-use of a significant number of buildings and spaces on the site, and will provide 34% of the site as accessible public open space. The proposal provides significant and attractive linkages to the new public transport amenity of the light rail. The proposal provides for the upkeep of the public open space areas so as not transfer the burden to the community despite the public benefits afforded.</p> <p>These positive outcomes are proposed with a relatively low yield (FSR 1.4:1-1.6:1). The capacity for the development to also quarantine further space for affordable housing is not viable in this instance. The significant benefits provided must be taken into context in this instance.</p> <p>A reasonable comparison can be drawn between the subject site and the adjoining McGill Street precinct, where half of the precinct has been earmarked to provide additional open space and the balance of the precinct will contribute to affordable housing. No site is proposed to provide open space and affordable housing. The proposed contribution to public access and open space is considered to be significant and appropriate in this instance.</p>
Traffic generation and distribution	The revised Concept Plan and cumulative impact with the amended Lewisham Towers proposal have been undertaken in accordance with the requirements of RMS and the third party traffic consultants engaged by the DP&I.

Agency	Response
<p>Addressing the Greenway</p> <hr/>	<p>The Concept Plan does:</p> <ul style="list-style-type: none"> • Address the future Greenway as an active frontage; • Provide open space accommodating linkages to integrate with the future Greenway; • Provide permanent public access through the site to the future Greenway; • Provide view corridors to and through the future Greenway; • Provide passive surveillance to the future Greenway and light rail; • Can accommodate materials and finishes to enhance the visual amenity of the future Greenway which can be addressed in detail in future Development Applications for each stage; • Furniture and structures provided can complement the Greenway which can be addressed in detail in future Development Applications for each stage; • Includes an ESD strategy as detailed within Attachment 10 of the EA lodged for assessment; • Includes WSUD principles as detailed at Attachment 6 of the EA lodged for assessment; • The landscape treatment can include locally indigenous species and the Statement of Commitments particularly references the provision of planting for habitat and foraging for the Long-Nosed Bandicoot; • Lighting and interfaces with the Greenway can be detailed at future Development Application stages to address management of light spill impacts to the Greenway and access for fauna; • Way finding signage can be accommodated and detailed in future Development Applications; • Street activation of the accesses to the light rail are integral to the design and provision of landscaped open spaces and plaza areas framed by convenience retail spaces to accommodate safe and interesting access through the site to the future Greenway and the light rail; <hr/>

Agency	Response
	<ul style="list-style-type: none"> The site provides at grade accessible access for persons with limited mobility; and The proposal provides a significant contribution to the future Greenway by providing public access through the site that would not otherwise be possible. This access is to be maintained by the development and will be an on-going contribution to the Greenway and the light rail corridor. Further contribution is not considered warranted.
General transport matters	<p>The EA was lodged with a detailed TMAP. This TMAP and the associated modelling has been further reviewed in conjunction with the RMS and reviewed by the consultants engaged by the DP&I to confirm the veracity of the traffic impact assessment. (refer to Attachment 4)</p>
Open space provision	<p>The provision of open space has been addressed previously.</p>
Land use and loss of employment lands	<p>The site adjoins a former light industrial precinct (McGill Street) that is now zoned for mixed use and residential purposes. This zoning conflict presents challenges to the on-going use of the subject site for light industrial purposes. Further the Ashfield Planning Strategy identifies the site as suitable for mixed use purposes, not continued light industrial use. This is a sound planning approach given the site's proximity to public transport infrastructure that should be maximised.</p> <p>This also needs to be considered in the context of the Economic Impact Assessment that has identified that the retail and employment uses proposed for the site could regenerate 215 full and part time jobs, greater than the employment levels of the site operating as a flour mill.</p>
Urban Design	<p>The justification of the additions to the four pack of silos has been addressed in detail in this PPR.</p> <p>The solar access study identifies that the Greenway is in almost full sun between 9.00am and midday in mid-winter. The Greenway would continue to receive substantial solar access until 1.00pm and is essentially the replication of the current pattern of solar access received by the corridor in this location as the current building forms are largely retained.</p> <p>Privacy impacts have been avoided through substantial setbacks and separation to surrounding</p>

Agency	Response
	<p>residents in excess of the SEPP 65 requirements.</p> <p>A noise impact assessment was submitted with the EA addressing road, rail and aircraft noise as well as vibration from the road and rail sources.</p> <p>The majority of structures are reconstruction and re-use of existing buildings so afford little or no opportunity to setback from the corridor. The new Building 1A is setback 10.0m from the corridor. The retention of the existing setbacks also reinforces the address of the development to the Greenway to provide the casual surveillance and address to the corridor sought.</p>

Table 1: Response to Agency submissions

4.2 Response to Community Groups

The issues raised in the community group submissions are addressed in the following table.

Community Group	Response
Greenway	
Addressing the Greenway	The Concept Plan has been prepared for development to front the Greenway and to afford public access to the Greenway, light rail and future pedestrian cycle paths. This includes active frontages and casual surveillance opportunities.
Concurrent assessment with Lewisham Towers	This is a matter for the DP&I and the PAC.
Landscape linkages to the Greenway	The Concept Plan provides ample opportunities for the provision of linkages to the Greenway that will support the use and activation of the Greenway. The detailed landscape treatments can be refined with subsequent Development Applications.
Access restriction to biodiversity areas	The final treatment of the interface will be resolved with the future Development Applications in conjunction with Transport NSW and the Greenway groups. The restriction of access to dedicated paths to avoid intrusion into biodiversity zones could be readily accommodated.
Biodiversity	The detailed landscape plans can include the incorporation of a variety of habitats consistent with the commitment to provide foraging and habitat for the Long-Nosed Bandicoot as proposed in the Statement of Commitments.

Community Group	Response
Long-nosed bandicoot	The survey provided will be required to be updated with future Development Applications for each stage.
Flora and fauna needs	The landscape treatment can be detailed to provide a variety of flora populations to complement future Greenway treatments and fauna habitat requirements. The treatment to the landscaped areas can include lighting treatments to minimise light spill. A 3.0m buffer to the Greenway is not possible in most locations due to the existing buildings being located on or close to the site boundary. The Concept Plan includes the proposal to remove the siding structures to the Mungo Scott building that encroach into the light rail corridor and the future Greenway.
View corridors	The large open space linkage provides a strong visual link to the Greenway corridor as well as providing access. Gaps through the building provide visual link as well as additional potential access locations.
Furniture/material	The palette of materials and finishes is yet to be finalised and will be refined in future Development Applications for each stage.
Water Sensitive Urban Design (WSUD)	The Concept Plan incorporates WSUD principles as detailed at Attachment 6 of the EA lodged for assessment.
Friends of the Greenway	
Limitation of car parking	The proposal has provided car parking in accordance with the requirements of Ashfield Council. The proposal is in a location to support the utilisation of transport other than the private vehicle for regular travel such as commuting. The Concept Plan includes proposals for the inclusion of car share spaces and supports bicycle travel by providing links through the site to the Greenway and future cycleway. The future development applications for each stage will be required to accommodate bicycle parking facilities for residents and visitors.
Relocation of Greenway Trail	The access to Building 1A in the north of the site has been envisioned as a share way that provides an address to the lower level dwellings which will all have a front entry of this space. The interface to the Greenway will be landscaped and provide a transition and public access down into the Greenway corridor.

Community Group	Response
	<p>The relocation of the Greenway onto private land is not proposed in this instance. The design supports the Greenway through the provision of access into the corridor and providing an interface that can merge with the Greenway in relation to landscape treatments and flora and fauna support.</p>
<p>Transport linkage to the Greenway</p>	<p>The criticism of the connectivity with the future Greenway is not agreed. The Concept Plan layout provides multiple connections to the existing surrounding residential areas through the site and into the Greenway corridor. These connections have been provided for while also adapting and re-using significant existing heritage buildings and facilities.</p>
<p>Transport modal shift to walking and cycling</p>	<p>The transport analysis has been very conservative in estimating the increase in walking and cycling trips. If the development does indeed result in an increased modal shift then this outcome is positive and would reduce the impact that has been assessed in relation to transport and traffic impacts.</p>
<p>New connection to Old Canterbury Road</p>	<p>This proposed connection has been removed from the revised Concept Plan.</p>
<p>Provision of bush care site requested</p>	<p>The request to allocate further areas of the site as a bush care site cannot be supported. The proposal seeks to develop for new and re-used building 33% of the site. 34% of the site will be publicly accessible open space, 12% will be private open space and 20% of the site new streets proving access to the buildings in the development as well as access through the site to the Greenway corridor.</p>
<p>Longport Street bush care site ramp</p>	<p>The concept for the ramp treatment up to Longport Street is on land that is road reservation and partly the Sydney Water canal. The friends of Greenway could pursue this concept independently with the roads authority and Sydney Water.</p>
Inner West Environment Group	
<p>Provision of bush care site requested</p>	<p>The request to allocate further areas of the site as a bush care site cannot be supported. The proposal seeks to develop for new and re-used building 33% of the site. 34% of the site will be publicly accessible open space, 12% will be private open space and 20% of the site new streets proving access to the buildings in the development as well as access through the site to the Greenway corridor.</p>

Community Group	Response
Director-Generals Requirements	The proponent can only respond to the matters it has been requested to respond to and is not the author of the DGRs.
Creation of a busy space rather than focussing upon biodiversity	The site's location immediately adjacent to a new public transport facility and the Lewisham West stop will create a location that is focused upon pedestrian connectivity to the stop and connection to the future cycleway. As identified in the Marrickville and Leichhardt Council submissions and the Greenway submission the presentation of addresses to the Greenway in this location are important for casual surveillance, safety and a sense of ownership in the Greenway. Development that turns its back on the corridor can only replicate the poor outcomes evident in other locations along the Hawthorne Canal corridor. Where rear yards back onto the corridor, illegal dumping, graffiti and vandalism diminish the amenity and desirability to utilise the corridor. In this location due to the public transport facilities in particular, a modified approach to the corridor must be taken. The detailed landscape plans to be developed for future stages can and will be required to address opportunities for supporting the biodiversity of the Greenway vision and provide foraging and habitat opportunities for flora and fauna.
New connection to Old Canterbury Road	This proposed connection has been removed from the revised Concept Plan.
Relocation of Greenway Trail	<p>The access to Building 1A in the north of the site has been envisioned as a share way that provides an address to the lower level dwellings which will all have a front entry of this space. The interface to the Greenway will be landscaped and provide a transition and public access down into the Greenway corridor.</p> <p>The relocation of the Greenway onto private land is not proposed in this instance. The design supports the Greenway through the provision of access into the corridor and providing an interface that can merge with the Greenway in relation to landscape treatments and flora and fauna support.</p>
Longport Street bush care site ramp	The concept for the ramp treatment up to Longport Street is on land that is road reservation and partly the Sydney Water canal. The friends of Greenway could pursue this concept independently with the roads authority and Sydney Water.
Conversion of one of the silos to water treatment and	The conversion of the silos will remain as proposed

Community Group	Response
vertical gardens	for residential uses. The WSUD and ESD principles prepared for the site include water storage and re-use principles to maximise the environmental performance of the development. Future Development Applications could readily include consideration of roof top garden areas and the like.
Greenway drop in centre and bush care storage	The amended Concept Plan does not propose a Greenway education centre or storage for the bush care volunteers.
Access restriction to biodiversity areas	The final treatment of the interface will be resolved with the future development applications in conjunction with Transport NSW and the Greenway groups. The restriction of access to dedicated paths to avoid intrusion into biodiversity zones could be readily accommodated.
Biodiversity	The detailed landscape plans can include the incorporation of a variety of habitats consistent with the commitment to provide foraging and habitat for the Long-Nosed Bandicoot.
Ashfield and District Historical Society	
Height to Edward Street out of character with development opposite and concern they could be four level buildings	<p>The single four (4) storey building proposed to Edward Street has been revised to be a three storey building that presents a narrow profile to Edward Street. The remaining buildings to Edward Street are two (2) storey with attic space. Each is setback from the street and provided with a landscaped entry court to reflect the pattern of development opposite the site.</p> <p>The Edward street frontage includes deep soil landscape setbacks to provide front entry courts that reflect the character of the development to the west of the site.</p>
Potential heritage significance of the 1960's office building and retention of trees particularly at Edward Street intersection, wine glass palms on Smith Street and between canal and former goods line	<p>The milling and baking centre building was assessed as having moderate significance in the heritage assessment undertaken. The retention and re-use of the building was not considered a necessary outcome as the building has been added to and modified at least 5 times since its initial construction.</p> <p>The trees at the Smith Street frontage, including the wine glass palms are proposed to be retained and incorporated into the publicly accessible open space areas.</p>

Community Group	Response
Additions to the 4 silos inappropriate and do not complement the silos.	The silos are assessed as having low heritage significance which includes the blower and hoist structures at the top of the silos. The proposed removal of these structures and their replacement with cylindrical forms does not detract from the appreciation that these buildings are adapted silos that will aid in the appreciation and understanding that the site operated as a flour mill prior to the redevelopment of the site.

Table 2: Response to Community Group submissions

4.3 Response to Community Submissions

The issues raised in the community submissions are addressed in the following table.

Issue	Response
(1) Traffic congestion, particularly Smith, Longport and Old Canterbury Road	The traffic and transport assessment has been undertaken taking into account the impact of both developments and the results have been audited by traffic consultants engaged by the DP&I.
(2) Out of scale and character	The site abuts land that has now been rezoned to accommodate buildings up to 32.0m in height (10 storeys). The perimeter development provides for low rise buildings that do not result in adverse amenity impacts relating to loss of sunlight, privacy or loss of views. The proposal provides an appropriate interface with the surrounding development. The visual analysis of the existing silos at Attachment 3 demonstrates that the close views of the silos are currently largely screened by perimeter buildings and will continue to be screened by the proposed perimeter buildings and landscape treatments.
(3) Local amenity impacts	<p>The proposal has been demonstrated to have no adverse impacts upon privacy, solar access or views. The development will increase the population with the provision of 280-300 dwellings. 190-240 of these dwellings will be 1 and 2 bedroom dwellings. The 3 and 4 bedroom dwellings comprise 40-70 dwellings.</p> <p>The amended Concept Plan identifies the opportunity for the provision of a child care centre within the former amenities building (Building 5E).</p> <p>In addition the proposal delivers to the community 8,400m² of accessible open space areas that provide linkages to the future light rail as well as the future Greenway. These linkages and open space</p>

Issue	Response
	<p>areas would not be possible if the site were to remain as light industrial and developed for light industrial purposes. The proposal provides 54% (13,432m²) of the total site as site accessible areas in the form of the open space areas and the new streets.</p> <p>The Statement of Commitments includes the payment of s94 contributions to Ashfield and Marrickville Councils in accordance with the respective s94 contribution plans which would provide a substantial contribution to the delivery of amenities and facilities identified in these plans.</p>
(4) Adverse impact upon services (schools, child care)	<p>As identified the retained amenities building could readily be utilised as a childcare centre if commercial interest is available. The provision of school spaces and hospital facilities are matters for State Government to accommodate in their planning and management of their service delivery obligations. The provision of accommodation as proposed in a location that is highly accessible to transport options other than the private vehicle facilitates effective and efficient delivery and planning for the delivery of these services.</p>
(5) Limited open space in Ashfield that is exacerbated by the proposal	<p>The proposal provides 34% of the total site area as accessible open space areas that also facilitates linkages to future open space and recreation amenities proposed as part of the Greenway. The provision of these access options through safe and well lit linkages through the site will support the future Greenway and the light rail while also providing access to the future cycleway and pedestrian pathways.</p>
(6) Lack of consultation	<p>In addition to the statutory consultation requirements the proposal has been the subject of four separate consultation days as well as newsletters, a project website, phone information line and project email address. These initiatives have been the subject of a consultation report prepared by Urban Concepts that is included at Attachment 7.</p>
(7) Combined impact with Lewisham Towers proposal is excessive	<p>The applications are separate proposals that are both being assessed by the same assessment branch of the DP&I. The assessment criteria includes the requirement for the combined impacts of both proposals to be addressed, particularly in relation to traffic and transport matters and retail impacts. The amendment to the Lewisham Towers proposal to remove the supermarket and associated retail spaces has significantly altered the traffic generation</p>

Issue	Response
	impacts of the two proposals and the retail impacts to existing centres.
(8) Retail impact on Summer Hill	The revised Economic Impact assessment at Attachment 5 has confirmed that the revised application will not adversely impact upon existing centres, particularly Summer Hill. The proposal has not and does not propose a supermarket and does not include any retail space that could be utilised for a supermarket.
(9) Additions to the silos should not be supported	A detailed analysis of the visual impact of the existing silos has been provided at Attachment 3 that shows that the proposed additions to the silos are not excessive and will not result in unacceptable impacts to the locality. The heights of the silos also need to be considered in the context of the Marrickville LEP 2011 which permits buildings of up to 32.0m in height on the adjoining lands.
(10) Height at Smith Street is excessive	The proposed ten (10) storey building at Smith Street/Longport Street has been replaced with a six (6) storey podium to reflect the heights permitted on the adjoining McGill Street properties. The ten (10) storey element has been setback into the site to reduce the visual impact of this element of the proposal.
(11) Density and Bulk is inappropriate	<p>The proposal results in an FSR of 1.4-1.6:1 which for an urban renewal project is very modest. The FSR is also less than the range of FSRs permitted on the adjoining McGill Street precinct which range from 1.7:1 through to 3.0:1.</p> <p>As further comparison the Lewisham Towers proposal proposes 327 dwellings/ha compared to the 121 dwellings/ha proposed for the Summer Hill Flour Mill site.</p> <p>An alternate consideration of building form is site coverage. The proposal will result in a building footprint covering only 33% of the site leaving 67% of the site as publicly accessible open space, streets or private open space.</p> <p>The perimeter development forms are low rise limited to 2 storey plus attic along Edward Street with the exception of a single 3 storey building. Along Smith Street, buildings are up to four (4) storeys. The northern most building at Longport Street is six (6) storeys but is setback from the road bridge and is located on land 3.3m below bridge level.</p>

Issue	Response
	<p>The visual analysis at Attachment 3 demonstrates that the silos are not visually intrusive elements from close views in particular as they are largely screened by low rise development at the perimeters of the site.</p>
<p>(12) Impact upon Greenway during and post construction</p>	<p>The proposal includes the removal of siding shelters from the eastern side of the Mungo Scott building that currently encroach into the rail corridor that will accommodate the Greenway.</p> <p>This alone increases the effective width of the Greenway.</p> <p>No other construction work will impact upon the Greenway/rail corridor area with all construction occurring within the site.</p> <p>The proposal opens up access to the Greenway from surrounding areas allowing the potential for greater use and appreciation of the proposed Greenway. The proposal, by providing access to the Greenway and the ability to provide a landscape theme that supports the future Greenway treatment is instead considered to be a positive contribution to the realisation of the Greenway visions.</p>
<p>(13) Requirement for facilities such as child care and open space</p>	<p>A total of 34% of the site will be provided as publicly accessible public open space for the use and enjoyment of residents of the development as well as surrounding residents.</p> <p>The potential for the provision of a child care centre within the development has been identified with Building 5E.</p>
<p>(14) Affordable housing provision</p>	<p>The proposal has delivered a heritage outcome for the retention and re-use of a significant number of buildings and spaces on the site, will provide 34% of the site as accessible public open space, provides significant and attractive linkages to the new public transport amenity of the light rail and will continue to own and provide for the upkeep of the public open space areas so as not transfer the burden to the community despite the public benefits afforded.</p> <p>These positive outcomes are proposed with a relatively low residential yield (FSR 1.4:1-1.6:1). The capacity for the development to also quarantine further space for affordable housing is not viable in this instance. The significant benefits provided must be taken into context in this instance. A reasonable comparison can be drawn between the</p>

Issue	Response
	<p>subject site and the adjoining McGill Street precinct, where half of the precinct has been earmarked to provide additional open space and the balance of the precinct will contribute to affordable housing. No single site is required to provide open space and affordable housing. The proposed contribution to public access open space and heritage retention is considered to be significant and appropriate.</p>
(15) Opposed to new shopping centre	<p>No shopping centre is proposed. Support retail space is provided throughout the development to activate access ways and provide support retail services for residents, workers and commuters.</p>
(16) Support for concept if properly executed. Concerns over scale, traffic impacts an availability of service, childcare and school spaces	<p>The scale of the development has been demonstrated to be able to be pursued without amenity impacts and must be considered in the context of the permitted heights on the adjoining McGill Street precinct.</p> <p>The traffic assessment has found that the impacts are acceptable in the context of the range of transport options available to the locality.</p> <p>The opportunity for the commercial provision of child care services has been identified, while school places are a larger policy matter for State Government to address and accommodate</p>
(17) Adjoining proposals should be considered concurrently	<p>This is a matter for the DP&I to consider.</p>
(18) Overdevelopment of the site	<p>The proposal results in an FSR of 1.4-1.6:1 which for an urban renewal project in an inner urban area is very modest. The FSR is also less than the range of FSRs permitted on the adjoining McGill Street precinct which range from 1.7:1 through to 3.0:1.</p> <p>It has also been demonstrated that the development can be undertaken without unacceptable impacts upon privacy, overshadowing and views which are typical indicators of when a development may constitute an overdevelopment.</p> <p>It is also noted that the proposal will result in a building footprint covering only 33% of the site leaving 67% of the site as publicly accessible open space, streets or private open space.</p>

Issue	Response
(19) Retail impacts upon Summer Hill, Lewisham, Leichhardt and Dulwich Hill	The revised Economic Impact Assessment has concluded that the level of service retail space proposed will not undermine the existing retail hierarchy nor result in the failure of surrounding retail centres.
(20) Impact upon Summer Hill village atmosphere	<p>The development is not visible from the Summer Hill village and has been demonstrated to not adversely impact upon existing retail viability within Summer Hill.</p> <p>The visual analysis has identified that the proposed heights will not have a detrimental amenity impact and that from close vantage points the silos are effectively screened by existing and proposed perimeter building forms.</p>
(21) Noise, pollution, crime and adverse impacts from over crowding	<p>The proposed density of 1.4:1 to 1.6:1 is relatively low. There is not necessarily a direct correlation between higher density living and crime. The fundamentals of the Concept Plan encourage casual surveillance of the public spaces therefore discouraging anti-social behaviour. Further it is anticipated that future Development Applications will be prepared having regard to CPTED principles.</p> <p>The Concept Plan provides ample provision of public and private open space areas for the benefit of future residents to the development.</p>
(22) Outcome of Community referendum 94% of 1,500 participants opposed to the two developments	<p>Details of the referendum have been requested but not provided.</p> <p>The merits of the application will be assessed and considered and a determination made by the Planning Assessment Commission which will consider the information provided with the application. The assessment of the DP&I includes consideration of the public submissions and the input from the relevant State agencies.</p>
(23) Height to Edward Street out of character with development opposite and concern they could be four level buildings	<p>The single four (4) storey building proposed to Edward Street has been revised to be a three storey building that presents a narrow profile to Edward Street. The remaining buildings to Edward Street are two storeys with attic space setback from the street.</p> <p>The Edward street frontage includes deep soil landscape setbacks to provide front entry courts that reflect the character of the development to the west of the site.</p>

Issue	Response
(24) Potential heritage significance of the 1960's office building	The milling and baking centre building was assessed as having moderate significance in the heritage assessment undertaken. The retention and re-use of the building was not considered a necessary outcome as the building has been added to and modified at least 5 times since its initial construction.
(25) Retention of trees particularly at Edward Street intersection, wine glass palms on Smith Street and between canal and former goods line	The trees are proposed to be retained and incorporated into the publicly accessible open space areas.
(26) No justification for the level of retail and commercial floor space and the impacts on existing centres	<p>The retail space proposed is service retail space to activate the public linkages through the site and provide support retail services for residents, workers and commuters. A supermarket is not proposed and could not be accommodate or serviced in the development.</p> <p>The commercial space is proposed to provide an adaptive re-use of the Mungo Scott building and to provide employment opportunities as required by the Inner West draft Subregional Strategy.</p> <p>The revised Economic Impact Assessment has identified that the levels of retail and commercial space proposed will not undermine the viability of existing centres.</p>
(27) Traffic impacts to Wellesley Street and creation of Wellesley St as a major entry	Wellesley Street is not proposed as a major entry. The entry to the site is located opposite Wellesley Street, however the traffic modelling identifies that traffic would primarily traverse Edward Street from Smith Street or Old Canterbury Road to access to the development.
(28) Need to incorporate parkland into the development	The Concept Plan includes 34% of the site as publicly accessible open space which equates to an area of 8,400m ² . The final treatment of the space will be determined in future applications for each stage. The space would be passive open space, not a sports field.
(29) Passive surveillance intrusion from the high rise dwellings	<p>The four pack silos are located deep into the site some 62.0m from Edward Street and 70.0m from Old Canterbury Road. The width of the Edward Street road reservation is 20.0m, meaning that the distance between dwellings and the silos is at least 80.0m, well in excess of separations recommended by the Residential Flat Design Code.</p> <p>The six pack of silos are 45.0m from Edward Street</p>

Issue	Response
	<p>and are therefore some 65.0m from the front boundary of the nearest residences.</p> <p>The potential for privacy intrusion is considered to be minimal.</p>
(30) Loss of morning solar access	<p>The solar access analysis shows that in mid-winter the properties on the western side of Edward Street and beyond do not receive any shadowing impacts in the worst case scenario of mid-winter. The dwellings on the eastern side of Edward Street that back onto the site do receive shadow impacts up to midday in mid-winter. These are existing shadows from the six pack of silos which will be marginally improved through the proposed removal of the upper level structures from this bank of silos.</p>
(31) Impact upon existing wildlife	<p>The flora and fauna assessment undertaken identified that no adverse impacts would result from the proposal. The Statement of Commitments includes recommendations for a landscape planting theme that would afford habitat and foraging opportunities for the Long-Nosed Bandicoot.</p>
(32) Loss of light industrial employment lands	<p>The loss of employment lands provides significant community benefits in regards to accessibility to the light rail corridor that would not be possible if light industrial uses were retained on the site.</p> <p>It must also be recognised that the buildings on the site are purpose built structures for flour milling and would be difficult to re-use for light industrial purposes without substantial alteration or demolition.</p> <p>The proposed retail and commercial spaces have been estimated to equate to approximately 215 full and part time jobs on the site which is greater than the previous levels of employment when the site was operating as a flour mill.</p>
(33) Loss of privacy due to towers	<p>The four pack silos are located deep into the site some 62.0m from Edward Street and 70.0m from Old Canterbury Road. The width of the Edward Street road reservation is 20.0m, meaning that the distance between dwellings and the silos is at least 80.0m, well in excess of separations recommended by the Residential Flat Design Code.</p> <p>The six pack of silos are 45.0m from Edward Street and are therefore some 65.0m from the front boundary of the nearest residences.</p>

Issue	Response
	<p>The apartments in the silos will be taking advantage of broad outlooks rather than views downwards to surrounding areas.</p>
	<p>The potential for privacy intrusion is considered to be minimal.</p>
<p>(34) Object to new road to the rear of Edward Street properties and resulting security and privacy concerns</p>	<p>The new road to the rear of the Edward Street properties has been amended to not include a connection through to Old Canterbury Road. This road is proposed to be a public road which would also afford rear access to the Edward Street properties that is not currently available and to provide physical separation between these properties and the proposed development.</p> <p>The road is not considered to contribute to privacy impacts or security impacts.</p>
<p>(35) Noise impacts from basement car park entry and exits particularly on the Edward Street dwellings</p>	<p>A basement entry is provided to the north of the adjoin dwellings fronting Edward Street. This car park access is setback 10.0m from the boundary with the nearest residential property.</p>
<p>(36) Light spill from vehicles leaving the basement onto Edward Street adjoining residence</p>	<p>If necessary, screening or similar design treatments could be considered at Development Application stage.</p>
<p>(37) Solar access impacts upon 34 Edward Street</p>	<p>The solar access impacts from the proposal derive from the existing six pack bank of silos. The level of overshadowing will be marginally reduced through the proposed removal from this bank of silos of the upper level structures.</p> <p>The proposal will marginally improve the level of solar access enjoyed by this property and the rear private open space of this property will be substantially in sunlight between 12.00midday and 3.00pm in mid-winter.</p>
<p>(38) Flood impacts and mitigation</p>	<p>The application has been designed to accommodate the potential overland flows across the site and to provide new residential floor levels above the predicted flood levels. The ground floor level of the Mungo Scott building is below the predicted flood level. This building is not proposed to contain sensitive residential uses and emergency management strategies are proposed to deal with flood situations for this building as detailed within the EA lodged for assessment.</p>

Issue	Response
(39) Safety of Old Canterbury Road access	This access location has been deleted from the amended Concept Plan.
(40) Need for junior sports field	The provision of a sports field is not practical in the development. The provision and acquisition of sports fields are matters for Ashfield Council to address through its expenditure of s94 revenue or allocation of rates revenue or the establishment of a levy for the acquisition of recreation lands.
(41) Preservation of established trees	The established trees to Smith and Edward Streets are retained in the proposed development.
(42) Long-Nosed Bandicoot impacts and survey is out of date	<p>Updates of the environmental assessments will be required with future Development Applications for each stage in the proposal.</p> <p>The assessment has recommended the provision of a landscape theme on the site that supports habitat and foraging opportunities for the Long-Nosed Bandicoot.</p>
(43) No more road access off Old Canterbury Road	This access location has been deleted from the amended Concept Plan.
(44) Bush corridor should be provided on site	<p>The landscape treatment will include treatments to support habitat and foraging opportunities for the Long-Nosed Bandicoot. The interface to the rail corridor includes landscape opportunities that will supplement the future Greenway.</p> <p>This also has to be taken in the context of the level of hard surfaced coverage of the existing development of the site and the number of existing buildings that are being retained that are located abutting the rail corridor where there is no opportunity to set these buildings back.</p>
(45) Insufficient off-street and on-street car parking	<p>Residential Car parking has been provided in accordance with the requirements of Ashfield and Marrickville Councils DCP's for car parking. Reduced parking rates for the retail and commercial spaces are proposed to encourage public transport usage.</p> <p>The site is located in an area that is well serviced by transport options other than the private vehicle. The use of these options should be encouraged by not providing excessive car parking.</p>
(46) Lack of environmental consideration such as solar panels, drying areas etc.	The EA lodged included an Ecologically Sustainable Development report (Attachment 10 of the EA) that has detailed the range of matters that can be

Issue	Response
	<p>accommodated in the development and that would be addressed in detail in each development stage.</p> <p>The ESD report concluded that the fundamentals of the Concept Plan support the potential for the inclusion of a range of ESD initiatives into the development.</p>

Table 3: Response to submissions

5.0 Conclusion

The PPR and revised Concept Plan have responded to the assessment issues raised by the DP&I, Sydney Water, RMS, Department of Transport, Ashfield Council, Marrickville Council and the community. The PPR provides a Concept Plan that is consistent with the context established by the McGill Street precinct Masterplan, which in conjunction with the Summer Hill Flour Mill site has the potential to create a vibrant Transit Oriented Development. The potential traffic impacts have been modelled in conjunction with surrounding development proposals and peer reviewed and independently assessed by traffic consultants engaged by DP&I. The management measures identified have been included in the Statement of Commitments.

The proposal delivers significant public benefits in regards to open space, open space linkages and access to public transport infrastructure that cannot be delivered without a redevelopment of the site for uses other than light industrial purposes.

These benefits, in conjunction with the provision of housing and employment uses well located in regards to transport and services, further support the proposal.

The proposal results in minimal adverse impact upon the amenity of the surrounding area in regards to privacy, solar access and views. The visual impact of the buildings has been shown in the visual impact assessment to be less than stated in the public submissions and in context with the heights permitted in the McGill Street precinct.

The development of the site will deliver significant public benefits through the provision of public access and open space that will support the use and patronage of the proposed light rail stop to be constructed adjacent to the site.

The traffic assessments acknowledge that the surrounding road network operates beyond capacity in peak times, however this has not been identified as a reason to reject the proposal. The proposal includes the provision of improvement measures including new roundabout and traffic signal as well as upgrades proposed to the surrounding pedestrian access facilities.

These range of works in conjunction with the access provided and the adaptive re-use of the range of structures and buildings on the site support the development of the site being allowed to proceed.

On balance, the proposal is considered to have considerable merit, and approval of the Concept Plan is sought subject to the implementation of the Statement of Commitments prepared for the proposal.



Attachments

Attachment 1: Summary of Submission Issues – SJB Planning

Attachment 2: Concept Plan - Hassell

Attachment 3: Visual Impact Assessment – SJB Planning

Attachment 4: Traffic and Transport Assessment – ARUP

Attachment 5: Economic Impact Assessment – Hill PDA

Attachment 6: Response to Sydney Water and flood management Issues – APP

Attachment 7: Community Consultation Report - Urban Concepts

(Provided under separate cover)

Attachment 8: RailCorp Owners Consent

Attachment 9: Revised Statement of Commitments