Summary of Submissions

The following provides a summary of the issues raised in each of the private submissions received. The submissions are identified by the number allocated by DP&I. The specific response to each particular issue is contained within the PPR.

Submissions provided on a pro forma have been summarised at the end of the table.

Submission Number	Issues and Comments
1	Concurrent assessment – Determination of the two applications (former Allied Mills site and Lewisham Towers) is required.
	Height – The Smith Street buildings are too tall and the silos should not be extruded as they overwhelm the silo structures.
	Density – The proposed density is too great and will generate excessive traffic.
	Green Space – Adequate green space should be provided.
2	Density – The proposed density is inappropriate.
	Traffic – The traffic generation is significant and will exacerbate exiting problems.
	Greenway – Management of the impact upon the Greenway during and post construction.
	Community Facility demand – Requirement for additional facilities such as childcare and open space.
	Affordable and Social housing – Opportunities for provision within the development.
	Concurrent assessment – D etermination of the two applications (former Allied Mills site and Lewisham Towers) is required.
9	Traffic – Traffic already unacceptable and proposal will add more trucks and cars to the area.
10	Principle of redevelopment - Support the development of the site, but concerned over the proposed sale and size of the proposal.
	Community Facility demand – No new essential services are provided for by the development. Availability of childcare and the capacity of Summer Hill Public School is of concern as is the lack of open space.
	Height – Ten (10) plus storey development is inconsistent with the suburb character and heritage value of the area.
	Traffic – The traffic generation is significant and will exacerbate exiting problems.

Subm Numb	
21	Concurrent assessment - Determination of the two applications (former Allied Mills site is required and Lewisham Towers) is required.
	Traffic – No appropriate strategy provided.
	Open space - The Greenway should be extended into the site and a park provided within the site.
	Community facilities - Increased demand on childcare and school and sports facilities.
	Rail capacity – Increasing population leading to further crowding of trains.
	Building height - No height to the silos should be added. The new tall buildings are inappropriate for the area.
22	Amenity - Additional dwellings will impact on amenity in the area.
	Traffic - Additional dwellings will lend to traffic problems.
	Height - There are no existing buildings of 11 storeys and with the addition of shopping facilities development is greater than should be proposed.
23	Consultation - Concerned that the local childcare service provider was not consulted regarding the proposal.
	Childcare capacity - There is insufficient capacity in the local area to accommodate incoming additional population.
	Traffic – No appropriate strategy provided.
	Scale and character - The proposal including heights of 10-13 storeys is out of character with the area.
	Limited green space - Ashfield is already densely populated area and the proposal has limited green space provided.
28	Food storage - Loss of well-located food storage.
	Viability - Due to peak oil production the past the proposal will be and viable.
57	Overdevelopment - The height and number of dwellings is an overdevelopment of the site and out of character with the area.
	Density and scale - Development will be out of character and have unacceptable impacts on traffic generation.
	Amenity and services – The proposal will have a detrimental impact on transport parks and recreation space and education facilities.
	Economic impact - Proposal will have an economic impact on Summer Hill, Lewisham, Leichhardt and Dulwich Hill shopping precincts.
83/84	Scale - Proposal out of character with the area.

	Submission Number	Issues and Comments
		Traffic - Proposal will lead to further the congestion.
		Amenity and services - Proposal have a detrimental impact on transport, parks and recreation space, education facilities and childcare facilities.
	92	Traffic - The proposal will result in a significant increase in local traffic particularly Old Canterbury Road. Combined with the Lewisham Towers proposal, the outcome is unacceptable.
		Consultation - The consultation was on a providing information only basis with no undertaking to respond or modify plans.
		Concurrent assessment - The impact of the two adjoining developments must be considered together.
	94	Scale - The proposal to be scaled back to ensure the proposal is sustainable in terms of traffic transport and open spaces.
	95	Scale – Proposal is out of scale and proportion with the surrounding area.
		Traffic and transport - Existing facilities already at breaking point.
		Community facilities – Amenities and parks are already under strain.
		Character - The new resident population will destroy the village character.
		Amenity - Increased noise, pollution and crime as a result of overcrowding.
		Precedent - Proposal leads to justification of future high-rise development and the combined impact of the Lewisham Towers proposal.
	96	Concurrent assessment - The impact of the two adjoining developments must be considered together.
		Traffic - The combined impact of the two adjoining developments is significant and unacceptable.
		Community consultation - Conservation was inappropriate with people being turned away.
		Scale and height - Height is oppressive and 300+ apartments if provided on site plus apartments for the Lewisham site will be unsustainable for the Summer Hill village.
senss		Community consensus - 94% of 1,500 local residents opposed the scale of the two developments.
ission		Light rail - The light rail does not offer a suitable alternative transport option.
Summary of Submission Issues		Determination – With the repeal of Part 3A, the application should be returned to Council for determination.
Summar		Revision - Both applications should be scaled back immediately to ensure sustainability in terms of traffic, transport, open public space and amenities.

	Submission Number	Issues and Comments
	98	Redevelopment – The concept of redevelopment is supported however the current proposal is an overdevelopment due in particular to traffic congestion.
		Concurrent assessment - The impact of the two adjoining developments must be considered together.
		Community facilities - Concern over the impact on local schools and childcare centres and upon the Summer Hill local shopping centre.
	99	Traffic – No appropriate strategy to deal with increased traffic congestion.
		Scale and character - The proposal is an overdevelopment and the heights of the towers exceed local building heights.
		Community facilities - Increased demand on childcare and school and sports facilities.
		Concurrent assessment - Determination of the two applications (former Allied Mills site and Lewisham Towers) is required.
	100	Scale to Edward Street - Terraced dwellings proposed could extend to four (4) storeys in height.
		Heritage and tree cover - The 1960s office building has heritage significance and has not been retained. The former substation building should be demolished and the area landscaped. There are further plantings which are significant on the site that should be retained.
		Building height - The structures at the top of the silos should not be used as a precedent for height.
		Retail commercial floor space - The methodology of the economic impact assessment is flawed. The combined impact of the two developments i.e. Summer Hill and Lewisham will have significant impact on existing centres and there is no justification for additional retail/commercial floor space.
		Traffic and site access - Traffic measures proposed will not work for long-term requirements. The need for intersection upgrades and roundabout treatments are matters for the local traffic committee. The access to old Canterbury Road should be abandoned.
		Environmental assessment - The EA does not identify any negatives of the Concept Plan and is not an appropriate planning assessment.
senss		Concurrent assessment - Determination of the two applications (former Allied Mills site and Lewisham Towers) concurrently is required.
Summary of Submission Issues	102	Traffic - Proposal would create rat runs down heritage conservation streets particularly Wellesley Street to Nowraine Street.
Summary o		Amenity impact – 1,000 new residents from this proposal and 2,000 new residents from the adjoining development will result in adverse impacts on the amenity of the area particularly traffic and parking and loss of the village atmosphere.

	Submission Number	Issues and Comments
		Revisions - Request 50% reduction in the proposal, all access to be via Old Canterbury Road or Smith Street, traffic assessment on the impacts on Wellesley Street and Nowraine Street, restriction of traffic access into Wellesley Street from Edward Street, consideration and parking impacts on Wellesley Street Parkland incorporated into the development and no additions to the silos.
		Concurrent assessment – Concurrent determination of the two applications (former Allied Mills site and Lewisham Towers) is required.
	103	Scale of development – Impacts arising from passive surveillance from high rise buildings and loss of solar access, particularly from the buildings that replace the existing office building.
		Wildlife – Impacts of the development upon existing wildlife along the Greenway.
		Community facilities – Impacts upon social services such as schools, child care, medical and other community services.
		Traffic – Congestion as a result of the development and the possibility of the new internal roads being drop off locations for the light rail.
	104	Height and scale fronting Edward Street – The concept would allow four (4) storey buildings that are out of context with the conservation area opposite.
		Heritage – The office building is a good example of 1960's commercial architecture and heritage significant vegetation is not satisfactorily addressed.
		Silo additions – Removal of the structures atop the silos should not be permitted to facilitate extension of the silos.
	106	Scale – The scale proposed is excessive, heights up to 13 storey is an over development.
		Community facilities – Impacts upon social services such as schools, child care, and transport services.
		Transport – The light rail will not address the transport needs of the area.
		Traffic – The development will further exacerbate the current traffic congestion.
		Open space – More open space is needed to support the amenity of the proposal.
		Retail – Already sufficient retail services in the vicinity.
sues		Sustainability – The development should include sustainability initiatives such as solar, rain water tanks and grey water use.
Summary of Submission Issues	107	Overall support – With some concerns.
of Sub		Traffic impact – Exacerbation of congestion by the proposal.
Summary		Height – The 13 storey height of the silo structures is unacceptable, 9 storey more appropriate.
		Concurrent assessment - Concurrent determination of the two applications

	Submission Number	Issues and Comments
		(former Allied Mills site and Lewisham Towers) is required.
	108	Traffic – There is no appropriate strategy to deal with increased traffic congestion from this proposal and the Lewisham Towers proposal.
		Limited green space – limited green space provided in an LGA already densely populated.
		Concurrent assessment – The combined impacts of the two developments on traffic, scale, design, overcrowding, loss of amenity and negative impacts on local businesses need to be considered.
	109	Concurrent assessment – Concurrent determination of the two applications (former Allied Mills site and Lewisham Towers) is required.
		Traffic generation – Car spaces and residences should be sold separately to discourage car ownership, more car share spaces should be provided and street parking in the vicinity should be limited.
		Density - Should be moderated to reduce impacts upon surrounding low scale development.
		Open space – Should be provided to avoid impact upon existing open space areas.
		Height – The structures on top of the silos should not be used as a calculation of the proposed height.
		Provision of local facilities – Construction of a bikeway under Parramatta Road should be required to link the two exiting paths.
	110	Redevelopment – Agree to redevelopment of the site but object to the proposed scale.
		Traffic – Edward Street will become a main thoroughfare to the car parks and traffic will add to existing congestion.
		Overlooking - Overlooking and loss of privacy from the development.
		Community Facilities – Medical, child care and schools at capacity.
		Concurrent assessment – The combined impact of the two developments has not been addressed.
ssion Issues	111	Traffic – No development should proceed until serious improvements made to surrounding roads and intersections. The proposed traffic generation rates are low and the proposed upgrades are inadequate.
Summary of Submission Issues		Transport upgrades – Development should fund local road improvements or provide incentives for occupants to use public transport.
Summe	112	No residential use – The light industrial zoning should be retained to maintain manufacturing and commercial employment opportunities in the inner ring areas.

Submission Number	Issues and Comments
	The adjoining Old Canterbury Road sites provide sufficient capacity for medium density housing.
	Traffic - Existing road system will not cope with additional traffic generation.
	Scale and character – The proposal is out of scale and character with Summer Hill and the ten storey building at the northern end of the site is excessive compared to the surrounding development. No additions to the silos should be permitted.
113	Privacy – Loss of privacy and overlooking.
	Silo extension – The height should not be extended.
	Traffic – Roads already at capacity in peak hour and the problem will be exacerbated. The access onto Old Canterbury Road is already difficult in peak hour
	Overall the development seems appropriate but there is no justification for 13 storey development.
114	Traffic – No credible strategy provided to deal with increased traffic congestion from both development proposals.
	Scale and Character – The proposal is out of character and at 10-13 storeys is an overdevelopment.
	Combined impact with Lewisham Towers proposal – The combined impacts of the two developments are not being considered.
	Lack of genuine community consultation – Community consultation has been limited and not genuine and concerns raised ignored.
	Impact on amenities and facilities – Schools, child care, parking and amenities cannot accommodate the incoming population.
	Limited greenspace – The limited greenspace provided is compounded by the existing density of Ashfield.
118	Scale and Height – Scale is out of character and the height is of concern due to the proposed additions to the existing silos.
	Traffic – Congestion will be exacerbated by the proposal.
	Impact on amenities and facilities – Schools, child care, parking and amenities cannot accommodate the incoming population.
	Open space –A reduction in density could deliver more open space for the current area.
	Combined overdevelopment - The two developments will create an undesirable pocket of development.
	Lack of genuine community consultation – Community consultation has been limited.

	Submission Number	Issues and Comments
	119	Height – The height proposed is excessive and additions to the silos should not occur.
		Traffic generation – Local roads already overcrowded to an unacceptable level that will not be eased by public transport.
		Commercial and retail – The amount of space proposed is excessive given existing proximity to Summer Hill and surrounds.
		Greenspace – Lack of private and public green space provided and representation of the proposed space is disingenuous relative to the Greenway and McGill Street Precinct.
		Concurrent assessment – The two applications should be considered together.
	126	Built form/urban design – Inappropriate in the context of surrounding development.
	127	Consultation – No direct consultation with the adjoining property owners.
		Inaccuracies – Plans do not depict the site boundaries accurately.
		New streets – New street to the rear of the Edward Street properties not required and will result in loss of privacy and security.
		Edward Street access – Too close to adjoining dwelling and will result in loss of safety to driveway and loss of on-street car parking and could be located closer to Smith Street.
		Basement car park entrance – Will impact upon adjoining dwelling having regard to noise and light spill.
		Overshadowing and privacy – The development will result in non-complying solar access and the six (6) storey building and silo conversions will result in loss of privacy due to overlooking.
		Light pollution – The development will result in light pollution into bedrooms and living areas.
	128	Concurrent assessment – The two applications should be considered together.
		Traffic – Further congestion and increased demand for car travel that cannot be accommodated.
Summary of Submission Issues	129	Traffic – No plan to deal with the congestion, the impact of traffic channelled to existing surrounding streets or the provision of measures to ensure car use is limited to the parking provided.
ary of Subr		Bike paths – Feeder bike paths not provided linking Summer Hill village to the Greenway.
Summa		Scale and character – Overdevelopment and the proposed heights are out of character.

	Submission Number	Issues and Comments
		Impact on amenities and facilities – Schools, child care, medical facilities, playgrounds and amenities cannot accommodate the incoming population.
		Limited greenspace – Limited greenspace is provided compounded by the existing density of Ashfield.
		Lack of genuine community consultation –Community consultation has been limited.
		Combined impact with Lewisham Towers proposal – The combined impacts of the two developments are not being considered.
		Retail impact – Excessive retail provision will adversely impact upon existing retail.
		Accessibility - Best practice accessibility should be imposed.
	131	Traffic – Traffic congestion will be worse and taxpayers will be required to fund road upgrades. The increased congestion and delays will increase carbon emissions.
		Parking – Loss of on-street car parking for existing residents.
	132	Concept of redevelopment and preservation of heritage fabric supported however the proposal fails to achieve many of the DGRs.
	133	Concept of the development supported but the level of the proposal is beyond what can be supported in the locality.
		Traffic – Existing network is already beyond capacity.
		Scale and height – The proposal is out of character with the area and a four storey maximum should be adhered to. No additions to the silos should be permitted.
		Overlooking – The silo apartments will overlook surrounding dwellings.
	134	Traffic – Existing network is already beyond capacity and will be made worse.
		Parking – The availability of on-street car parking will be further reduced
		Retail – The proposed retail space will adversely impact upon the Summer Hill village.
		Impact on schools – Local schools may not have the resources to cope with additional population.
SC		Scale and density – Not supported.
Summary of Submission Issues	135	Traffic – Object on the basis of traffic congestion.
y of Subn	136	Traffic – Congestion will be made worse.
imman		Scale – Excessive additional potential population.
S		Impact on amenities and facilities - Overcrowded schools and loss of village

	Submission Number	Issues and Comments
		atmosphere.
		Greenspace – Concept Plan shows greenspace along the rail corridor which is unlikely and the access to the light rail appears constrained.
		Design – Steel and glass is less sympathetic than predominantly brick.
		Combined impact with Lewisham Towers proposal – The combined impacts of the two developments are not being considered.
	137	Context – Adaptive re-use and mixed use of the mill site generally supported.
		Open space – Lack of active open space is a concern.
		Height and density - Proposed FSR acceptable but the proposed density and height in particular is of concern.
		Traffic – The combined impacts of the two developments will strain existing facilities.
		Concurrent assessment – Concurrent assessment of the impacts of the two proposals is required.
		Public Transport access – Access through the site to the proposed light rail is not adequately detailed and access to the Summer Hill and Lewisham stations needs to be improved.
		Heritage – More detail required regarding heritage retention and should include aboriginal heritage.
		SEPP 65 – More detail of architectural finishes and materials is required.
	138	Too large - Roads and schools will not cope
		Overshadowing – The proposal will result in loss of light currently accessed via window in Smith Street opposite the site.
		Positives – Inclusion of the light rail and placement of taller buildings to the centre of the site.
	139	School capacity – No capacity for Summer Hill Public School to expand to accommodate additional students from the two developments.
		Road safety – Increased traffic will increase safety concerns.
nes		Concurrent assessment – Concurrent assessment of the two proposals is required.
Summary of Submission Issues	140	Response to DGRs – The proposal fails to respond adequately to the DGRs issued for the proposal.
Summary of 5		Impacts of overdevelopment – Adverse impacts upon community amenity and existing infrastructure. Supportive of the redevelopment concept but not at the proposed scale and consequent impacts to the local community.
		Ownership – The land is not owned by EG Funds Management but a third party.

Submission Number	Issues and Comments
	Height – Maximum height to Smith Street should be 4/5/6 storeys similar to the rationale for Old Canterbury Road. The proposal with excessive heights will unacceptably dominate the entry to Summer Hill.
	Visual and view analysis – No adequate analysis has been provided to assess or justify the impacts of the proposed building height. Proposed 8-10 storey building are incompatible and incongruous in the local context.
	Height and site coverage – Proposed spatial arrangement occupies most of the site and will compromise the usability of the open spaces through overshadowing The Greenway would be deprived of all afternoon sun.
	Mungo Scott building – The building currently dominates the locality and should continue to do so. The proposal will diminish the prominence.
	FSR – No specific calculation for the FSR proposed within the Ashfield portion of the site, and the proposed FSR should be independently verified.
	Staging plan – Inadequate detail provided and no concurrent Project Plan for Sta 1 has been lodged.
	Flooding/Stormwater/Drainage – Concern that flooding in particular has not bee adequately addressed nor have Water Sensitive Urban Design measures been adequately addressed.
	Road/footpath/infrastructure within the site – The dedication of streets is proposed but ongoing maintenance is not addressed. No explanation of the ownership of land for public access through the site.
	External road infrastructure – No clear plan for delivery of traffic management improvements or the prevention of local traffic impacts or compensation of costs Council or funding of traffic lights and roundabouts proposed.
	Public Open Space – The amount of public open space is limited and not clear of how access for the public will be achieved. The use of the buildings within the proposed open space have not been defined or detailed.
	Urban Design – No detail of the Edward Street treatment, no front gardens to Edward Street, 4-6 storey buildings proposed in visual proximity to Edward street Edward Street should be low rise to respond to the typical development opposite and a lack of architectural detail provided to consider the integration and compatibility with the Conservation Area
	Heritage – Assessment has not been undertaken in accordance with the Burra charter and adequate information to consider the proposed impacts of buildings to be retained or proposed replacement buildings has not been provided.
	Negative impacts upon local amenity – The two developments combined will ov burden already stretched facilities such as schools, community facilities, open space and public utilities. The proposal should provide necessary additional community resources such as open space, child care, and school places.
	Economic Impacts – Retail should be restricted in scale to avoid impacts to Sum Hill village.
	ESD – Information generalist and provides no specifics of ESD initiatives.
	Contamination – concern over the limitation of the report and concern over

Submission Number	Issues and Comments
	compliance with SEPP 55.
	Traffic impacts – No credible plan to address traffic impacts and the increased traffic volumes. No mitigation measures provided for the Railway Terrace/Old Canterbury Road intersection operating at full capacity. The proposed new access to Old Canterbury Road would be unsafe.
	Parking – The levels of proposed car parking provision are not sufficient.
	Public Consultation – Not appropriate and was limited and selective and conducted in some instances in bad faith.
141	DGRs – The application does not respond to or address the DGRs issued for the proposal.
	Traffic congestion – No credible plan to address traffic impacts and the increased traffic volumes.
	Scale and Character – The development is out of scale and character with the local area.
	Height – 10-13 storey buildings are out of character and conflict with the heritage characteristics of Summer Hill.
	Impact on amenities and facilities – Overcrowded schools and childcare and amenities that cannot cope with increased population.
	Lack of public space - Opportunities to expand public space should be explored.
	Lack of genuine community consultation despite overwhelming community opposition - 94% of 1,500 local residents opposed the scale of the two developments. The consultation undertaken was limited and not genuine.
	Flooding – No flood mitigation measures have been proposed.
	Ownership - Concern that the ownership of the site has been misrepresented.
	Combined impact with Lewisham Towers proposal – The combined impacts of the two developments are not being considered.
	New Old Canterbury Road access - The proposed new access to Old Canterbur Road would be unsafe.
	Light rail – No detailed plans for the relationship with the proposed light rail or detailed ownership of land for public access to the light rail. No patronage study of the light rail or safety assessment of the light rail relative to the development of the area.
	Parking – The levels of proposed car parking provision are not sufficient.
	Affordable housing – No allocation of affordable housing.
	Visual and view analysis – No adequate analysis has been provided to assess or justify the impacts of the proposed building height.
	Solar access – The proposed spatial arrangement and height of buildings proposed will compromise the usability of the open spaces through overshadowing. The Greenway would be deprived of all afternoon sun.
	Heritage –Adequate information to consider the proposed impacts of buildings to

	Submission Number	Issues and Comments
		be retained or proposed replacement buildings has not been provided. The dominance of the silos and mill building in the landscape will be lost.
		Negative impacts upon local amenity – The two developments combined will over burden already stretched facilities such as schools, community facilities, open space and public utilities. The proposal should provide necessary additional community resources such as open space, child care, and school places.
	142	Height and scale – The proposal is too large.
		Traffic and parking – Existing congestion will be exacerbated and on-street parking will be lost. On-site car parking needs to be increased.
		Junior sporting field – A junior sport field such as Darryl Jackson Reserve should be provided.
		Privacy and overlooking – Adverse impact from dwellings within the silo buildings. All proposed west-facing windows should be frosted or screened to avoid privacy impacts.
	143	No opposition to the principle of redevelopment, but opposed to the proposed height being out of character with the locality.
		Long-Nosed Bandicoots – The survey may be out of date.
		Tree preservation – As many of the trees on site should be preserved.
	144	Supports the concept of avoiding through traffic use through the site and linked plazas to provide access to the light rail and Greenway.
		Options need to be explored relating to the treatment of the open spaces to facilitate recreation, food production and understorey habitat opportunities.
		Integration and management of pedestrian safety needs to be considered as well as options for the landscape theme of the Greenway and utilising the Greenway for improved pedestrian/cycle access and safety.
	1110	Scale - The scale of the proposal is excessive and not in keeping with the surrounding areas and the proposal is out of character with the heritage of the area.
		Traffic – Increased traffic congestion and the impacts are underestimated.
<i>(</i>)		Lack of greenspace – The proposed open space provision is inadequate. The space provided is more in the form of access ways than public open space.
sion Issue:		Commercial development – There is no need for large commercial development and the proposal will impact upon Lewisham and Summer Hill.
of Submis		Combined impact with Lewisham Towers – Fear of a lack of coordination in planning.
Summary of Submission Issues		Part 3A – Concerned that determination will be at State Government rather than Local Government level.

Submission Number	Issues and Comments
1111	Redevelopment to residential is positive, but needs to be at a smaller scale and a traffic generating commercial element should be deleted.
	Impact on schools – Overcrowded schools from incoming population.
	Required – More open space, lower buildings to ensure the mill remains domina and is not overshadowed, removal of commercial space, and inclusion of childca facilities.
1113	Part 3A – Object that determination will be at State Government rather than Loc Government level.
	Density and height – The density and building heights are excessive and will res in negative impacts on the amenity and lifestyle of existing residents.
	Height – The Longport Street building should be 2-3 storeys, not 10 storeys.
	Architectural design – Not supported.
	Parking – Inadequate off-street parking provision.
	ESD – No attempt to consider measures such as solar hot water, photovoltaic cells, on-site garbage and sewage treatment.
	Open space – The landscaped area to the north of the Mungo Scott Building should be retained.
Form letters	Traffic – No credible strategy to deal with increased traffic congestion from both development proposals.
	Scale and Character – The proposal is out of character and at 10-13 storeys is overdevelopment.
	Impact on amenities and facilities – Overcrowded schools and loss of village atmosphere.
	Greenspace – Concept Plan shows green space along the rail corridor which is unlikely and the access to the light rail appears constrained.
	Lack of genuine community consultation – Community consultation has been limited.
	Combined impact with Lewisham Towers proposal – The combined impacts of the two developments are not being considered.
	Retail impact on Summer Hill village – The proposal includes excessive retail space which will squeeze out local small businesses.