

SJB Planning

Environmental Assessment



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Summer Hill Flour Mill Site

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Concept Plan MP10_0155

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6 May 2011



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| Attachment 1: | Summer Hill Flour Mill Site Concept Plan Report prepared by Hassell |
| Attachment 2: | Site Survey prepared by Watson Buchan |
| Attachment 3: | Capital Investment Value assessment prepared by WT Partnership |
| Attachment 4: | TMAP prepared by ARUP |
| Attachment 5: | Heritage Impact Assessment and Statement of Heritage Impact prepared by John Graham and Associates |
| Attachment 6: | Drainage/Water Management/Flooding/Utilities Report prepared by APP |
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| Attachment 11: | Flora and Fauna Assessment prepared by Travers Environmental |
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| Attachment 14: | Aboriginal Heritage Impact Assessment prepared by AHMS |
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| Attachment 16: | Historical Archaeological Assessment Report prepared by AHMS |
| Attachment 17: | Communication Plan prepared by Urban Concepts |
| Attachment 18: | NSW Office of Water Letter – 21 February 2011 |
| Attachment 19: | Draft Statement of Commitments |

**Environmental Assessment**

Prepared under Part 3A of the *Environmental Planning and Assessment Act 1979*.

Environmental Assessment Prepared by:

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Proponent and Land Details

Proponent: EG Funds Management
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Subject Site: 2-32 Smith Street, Summer Hill

Lots and DPs: Lot 1 DP73521, Lots 1-2 DP131120, Lot 1 DP171676, Lot 1 DP302585, Lot B DP171931, Lot B DP172600, Lot 1 DP182276, Lot 16 DP130884, Lot 11 DP315, Lot 13 DP315, Lot 14 DP315, Lot 15 DP315, Lot A DP302421, Lot B DP302421, Lot 1 DP955001, Lot 1 DP951124, Lot 100 DP221222 and Lot 1 DP900501.

Summary of Project: Concept Plan for an adaptive mixed use residential, retail and commercial development, including new structures and basement car parking for:

- 280-300 dwellings
- 3,500-4,000m² of commercial space
- 2,500-2,800m² of retail space
- 450-500 basement car parking spaces
- 50-70 on-street car spaces
- 8,400m² of publicly accessible open space incorporating linkages to the Lewisham West light rail stop
- New streets

Declaration

I certify that I have prepared the content of this environmental Assessment and to the best of my knowledge has been prepared, in accordance with the *Environmental Planning and Assessment Act 1979* and the *Environmental Planning and Assessment Regulation 2000*, and that it is true in all material particulars and does not mislead nor by presentation or omission of information materially mislead.

A handwritten signature in black ink, appearing to read 'Scott Barwick'.

Scott Barwick
6 May 2011



EXECUTIVE SUMMARY

The Summer Hill Flour Mill site is located adjacent to the corridor for the Inner West light rail extension and within the walkable radius from the Summer Hill and Lewisham passenger rail stations. This access to mass transit public transport options makes the site and the adjoining McGill Street Precinct ideal for redevelopment for mixed use purposes. The potential for this redevelopment precinct has already been recognised in the planning framework prepared for the former industrial lands located within the Marrickville council area. The McGill Street Precinct Master Plan and Draft Marrickville LEP 2010 provide development controls compiled to take advantage of the strategic advantages afforded by the existing and proposed public transport facilities to transform the area from a run down former industrial precinct into a vibrant mixed use precinct.

The planning framework for the former industrial lands within the Ashfield Council area is not as advanced, however the potential for the flour mill site is recognised in Ashfield Council's Urban Planning Strategy. This Concept Plan embraces the strategic opportunity afforded by the site to provide residential and employment opportunities on a site with excellent public transport access in a manner that seeks to reuse much of the important building fabric. The approach to the development embodied in the Concept Plan is to retain these locally important building elements while also opening up the site to public access. The public access will in the longer term provide access to the proposed Lewisham West light rail stop and link with the McGill Street Precinct to provide connectivity between Summer Hill and Lewisham that has historically been blocked by the light industrial and goods rail uses of the land.

The proposed outcome is consistent with the Metropolitan Plan for Sydney 2036 which seeks to support urban renewal opportunities for sites within the walking catchments of existing and proposed centres of all sizes with good public transport or in the catchment of short term potential public transport infrastructure. With access to the existing passenger rail service and the proposed light rail service the Summer Hill Flour Mill site accords with both of these guidelines.

As demonstrated in this Environmental Assessment the site is eminently suitable for adaptation to mixed uses supported by well located and configured new buildings that deliver a highly permeable network of publicly accessible places and paths that support and complement the vision for the McGill Street Precinct, the Inner West light rail extension and the Greenway.

The proposed development provides the opportunity to provide a significant contribution towards the dwelling and employment creation targets for the Ashfield Council area set out in the Draft Inner West Subregional Strategy in a manner that achieves high amenity and environmental performance and recognises the local significance of the site and the dominant structures on the site.

The proposal retains the larger scale structures on the site and is consistent with the urban pattern and scale of development adopted by Marrickville Council for the adjoining McGill Street Precinct. The intensity and range of proposed uses has been demonstrated as being capable of support within the existing infrastructure subject to the augmentation measures identified.

The proposed development is an exemplary example of an adaptive reuse of a site and structures for a transit oriented development and the Concept Plan subject to the Draft Statement of Commitments included with the application.



1.0 INTRODUCTION

This Environmental Assessment (EA) has been prepared on behalf of EG Funds Management by SJB Planning Pty Ltd and comprises part of an application for approval of a Concept Plan pursuant to Section 75M of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979). The EA has been prepared to respond to the Director General's Environmental Assessment Requirements (DGRs) issued on 16 December 2010 under Section 75F of the EP&A Act 1979.

The proposal was determined by the Minister to be a project to which Part 3A of the EP&A Act 1979 applies on 28 October 2010.

The proponent of the Concept Plan proposes to develop the site including the adaptive re-use of existing buildings and structures of heritage significance and the construction of new residential and mixed use buildings and publicly accessible open space.

The Concept Plan proposes the provision of:

- 280-300 dwellings
- 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
- 50-70 on-street car spaces
- 8,400m² of publicly accessible open space
- publicly accessible linkages to the Lewisham West light rail stop
- new vehicle and pedestrian access points from the Smith Street and Edward Street frontages of the site.

As depicted in Figure 1 below, the range of uses is proposed to be accommodated within:

- the adaptive re-use of the existing Mungo Scott mill building, two sets of concrete silos, the former electricity substation building, amenities building and former office building attached to the Mungo Scott building;
- new buildings will be provided with a height of 2-3 storeys fronting Edward Street, 4 to 6 storeys to the west of the open space link through the site and 6 storeys to the south of the main bank of four silos;
- a new building of 9 storeys and with the same envelope will replace the current wheat bin store building to the south of the Mungo Scott building; and
- in the north east corner of the site below the Longport Street overbridge will be new buildings ranging between 5 and 10 storeys.



Figure 1 Building identification diagram.

| Identification | Description |
|----------------|--|
| 1A | New residential buildings, 10, 8 and 5 storeys in height. |
| 1B | New retail/commercial building 1 storey in height |
| 1C | New retail/commercial building, 2 storeys in height. |
| 2A | Adaptive re-use – existing Mungo Scott building, 6 storeys in height. Ground floor retail, commercial above possible loft residential. |
| 2B | Adaptive re-use – existing building 2 storeys in height. Retail/commercial uses. |
| 2C | Adaptive re-use – existing building former sub-station building, 1 storey high. Retail /commercial uses. |
| 3A | New 9 storey building. Retail at ground floor, residential above. |
| 3B | New 2 storey building. Retail/commercial uses. |
| 3C | Adaptive re-use – existing silos, 13 storeys in height. All residential use. |
| 3D | New residential building 6 storeys in height. |
| 4A | New residential building 4 storeys in height. Retail use in part of ground floor. |
| 4B | New residential building 6 storeys in height. |
| 4C | New residential building 2-3 storeys in height. |
| 5A | New building 11 storeys in height. Retail at ground floor, residential above. |
| 5B | Adaptive re-use – existing silos, 11 storeys in height. All residential use. |
| 5C | New residential building 2-3 storeys in height. |
| 5D | New residential building 4-6 storeys in height. |
| 5E | Adaptive re-use – existing amenities building 2 storeys in height. Retail/commercial at ground floor. |

Table 1 Building description and use.



The Concept Plan has been developed to complement the Master Plan prepared by Marrickville Council for the adjoining McGill Street Precinct. The McGill Street Precinct Master Plan has been prepared and adopted by Marrickville Council to guide the urban renewal of a largely disused industrial precinct to mixed uses. The principles of the adopted Master Plan have been incorporated into the draft comprehensive Marrickville LEP which completed public exhibition on the 28 February 2011.

The two sites are separated by the former goods rail line linking White Bay to Dulwich Hill which has recently been granted Project Approval under Part 3A of the EP&A Act 1979 for the extension of the current light rail line linking Lilyfield to Central Station. This extension of the light rail will be complemented by the Greenway project incorporating a green corridor along the alignment of the rail line and parts of the Hawthorne Canal along with a pedestrian cycleway linkage. The provision of the pedestrian cycleway and green corridor is included as part of the Project Approval for the light rail extension.

The approval of the light rail extension and the provision of a new Lewisham West light rail stop located centrally between the subject site and the McGill Street Precinct Master Plan area provides the focus for the development and establishment of a significant transit oriented development of the wider precinct. Such a development has the capacity to provide a range of residential, employment and recreation opportunities to complement the current opportunities within Summer Hill and Lewisham. The development proposed under this Concept Plan will facilitate public access to the proposed light rail to the benefit of the surrounding existing residential areas and complement the linkages to the light rail stop embedded within the adopted McGill Street Precinct Master Plan.

The site's location adjacent to the new light rail stop and within a five minute walk to either Summer Hill or Lewisham rail stations as well as the existing retail village of Summer Hill is ideally located to support the proposed development.

Specifically the site conforms to and is consistent with the updated Metropolitan Plan for Sydney 2036 released in December 2010, which at Section B seeks to encourage development opportunities within the walking catchment of existing centres (Action B1.3) or within areas serviced by existing rail corridors or transport corridors with short to medium term delivery (Objective B3). The approval of the light rail extension with a short term completion timeframe and the accessibility of the site to the existing passenger rail network conforms to these strategic directions from the Metropolitan Plan.

2.0 SITE DESCRIPTION

2.1 Site Location

The site is known as 2-32 Smith Street, Summer Hill (refer Figure 2). The majority of the land is within the Ashfield Council local government area. A small portion of the site to the east of the Hawthorne Canal which bisects the site is within the Marrickville Council local government area, as the canal forms the administrative boundary between these two local authorities. The Hawthorne Canal is owned by Sydney Water.



Figure 2: Aerial of subject site (Source: ©www.six.lands.nsw.gov.au).

The site enjoys road frontages and vehicular access from Smith Street and Edward Street. The site also has a frontage to Old Canterbury Road, but does not currently have any direct vehicular access onto this road. The eastern boundary of the site presents directly to the rail corridor proposed to be converted for light rail and Greenway.

2.2 Existing Use and Development

Consistent with the former use of the site as a flour mill the land is occupied by a range of buildings and structures associated with the flour milling process. These include the six level “Mungo Scott” mill building, the high rise concrete silos, two and three level administration building, amenities building and associated hardstand car parking areas and landscaping and rail sidings.

The site is currently unoccupied with the milling operations having relocated to a new facility in Picton.



The characteristics of the site are:

- road frontages and vehicular access from Smith Street and Edward Street;
- the property enjoys a frontage to Old Canterbury Road, but does not currently have any direct vehicular access onto this road;
- the eastern boundary of the site presents directly to the rail corridor proposed to be converted for light rail and the Greenway;
- the site is bisected by the Hawthorne Canal owned by Sydney Water in the north eastern portion of the site; and
- vegetation on the site is introduced species and is focussed to the Smith Street frontage of the site.

2.3 Ownership and Legal property description

The land is owned and controlled by EG Funds Management. The landholding subject to this Concept Plan application comprises the following legal descriptions:

Land Owned by EG Funds Management and within Ashfield LGA:

- Lot 1 DP73521
- Lot 1-2 DP131120
- Lot 1 DP171676
- Lot 1 DP302585
- Lot B DP171931
- Lot B DP172600
- Lot 1 DP182276
- Lot 16 DP130884
- Lot 11 DP315
- Lot 13 DP315
- Lot 14 DP315
- Lot 15 DP315
- Lot A DP302421
- Lot B DP302421
- Lot 1 DP955001
- Lot1 DP951124
- Lot 100 DP221222

Land Owned by EG Funds Management and within Marrickville LGA:

- Lot 1 DP900501

The total holdings comprise a site area of 24,738m².

The development site is essentially bound by Old Canterbury Road to the south, Edward Street to the west, Smith Street and Longport Street to the north and the former goods rail corridor to the east.

2.4 Topography

The site has been modified to accommodate the industrial land uses and as a result is relatively level. The site slopes gently away from Edward Street towards the Hawthorne Canal. The land immediately abutting the Hawthorne Canal frames the canal alignment with relatively steep embankments.



2.5 Drainage and Flooding

The site drains naturally to the Hawthorne Canal and the associated open stormwater channel that runs parallel to the alignment of Smith Street. The site is not identified as flood prone land in any environmental planning instrument; however detailed site investigations have confirmed that the site is affected by the predicted 100 year Average Recurrence Interval (ARI) flood levels.

2.6 Heritage

The site is not identified in any environmental planning instrument as being within a heritage conservation area or as containing heritage items. The Hawthorne Canal which traverses the site is identified by Sydney Water, the owner of the canal, on its Heritage and Conservation Register kept under Section 170 of the NSW *Heritage Act 1977*. The site is not listed on the State Heritage register.

The land to the west of the site is identified as a heritage conservation area under the provisions of Ashfield LEP 1985, and is described as the "Quarantine Grounds" heritage conservation area.

Despite the subject site not being subject to any formal heritage listings, the proposal has included a detailed assessment of the heritage significance of the buildings and the place. The site has also been subject to a consideration of the potential Aboriginal and historic archaeological significance of the site.

2.7 Vegetation

The site comprises highly altered landforms and is devoid of any remnant native vegetation. The Flora and Fauna Assessment undertaken for the site by Travers Environmental (refer Attachments 11 and 12) identifies two vegetation communities. These are:

- landscaped gardens and lawns
- exotic trees and shrubs

The Concept Plan proposes the retention of the avenue planting running from Smith Street traversing through the site and ending adjacent to the Mungo Scott building. This existing planting will form part of the open landscaped area provided in the site and frame the proposed pedestrian access route to the proposed Lewisham West light rail stop.

2.8 Contamination

A Detailed Environmental Site Assessment (ESA) of the site was undertaken by Aargus Pty Ltd (Attachment 13) including soil sampling and analysis. The investigations were undertaken having regard to the proposed redevelopment of the site for mixed uses including residential uses. The assessment concluded that:

Based on the results of this investigation it is considered that the risks to human health and the environment associated with soil and groundwater contamination at the site are low in the context of the future development. The site is therefore considered to be suitable for the future development, subject to the following:

- *It is recommended that an appropriate remedial / management strategy is developed, culminating in preparation of a Remedial Action Plan (RAP) in accordance with DECC guidelines, once the proposed development has been finalised.*



- *Any soils requiring removal from the site, as part of the remediation process, should be classified in accordance with the "Waste Classification Guidelines Part 1: Classifying Wastes, NSW DECC 2008".*
- *Groundwater within GW1 is re-assessed after the remediation process has been completed and the UST and associated potentially impacted soils removed.*

These requirements can be addressed in any approval issued for the site or as part of the Statement of Commitments.

The remediation works identified as being required constitute Category 2 remediation work under the provisions of SEPP 55 Remediation of Land and would not require further development consent being obtained.

2.9 Geotechnical Conditions

The site has been the subject of detail geotechnical investigation to assess surface and subsurface conditions. The investigation was undertaken to determine the suitability of the site for the proposed development.

The investigations have confirmed that, subject to standard engineering requirements, the site is suitable for the proposed development.

The investigations included the consideration of groundwater and groundwater quality. The groundwater quality was determined to meet regulatory requirements and would not affect ecological or environmental receptors. Further, due to the depths at which groundwater was located and the proposed depths of basement excavation, no groundwater pump out is required.

2.10 Site Context

The area that is the subject of this EA forms the majority of an isolated pocket of industrial land and is immediately adjoined by land to the west, north-west and the south zoned for residential purposes. Existing residential development to the west in Edward Street is characterised by detached dwellings of one and two storeys in height and which are located within a heritage conservation area.

The industrial buildings in the south of the precinct fronting Edward Street are a mix of two and three storey buildings interspersed with single storey cottages. The industrial buildings fronting Edward Street are occupied by a range of storage, light manufacturing and fabrication uses.

The site is located to the south of the Great Western Railway Line and is within an easy 400m walk of Summer Hill and Lewisham Stations and has easy access to the Sydney Buses bus route utilising Old Canterbury Road (Route 413). The site is located within an easy walking distance to the Summer Hill and Lewisham villages.

The existing pattern of development is consistent with the underlying zones applying to the lands under the current Ashfield LEP 1985 (Figure 3) and Marrickville LEP 2001 (Figure 4). The current light industrial zone of the subject site is surrounded by generally low rise residential development of relatively high density.

The site is separated from the remainder of the industrial precinct in the Marrickville Council area to the east by the Rozelle freight rail line corridor which is to be converted to light rail usage.

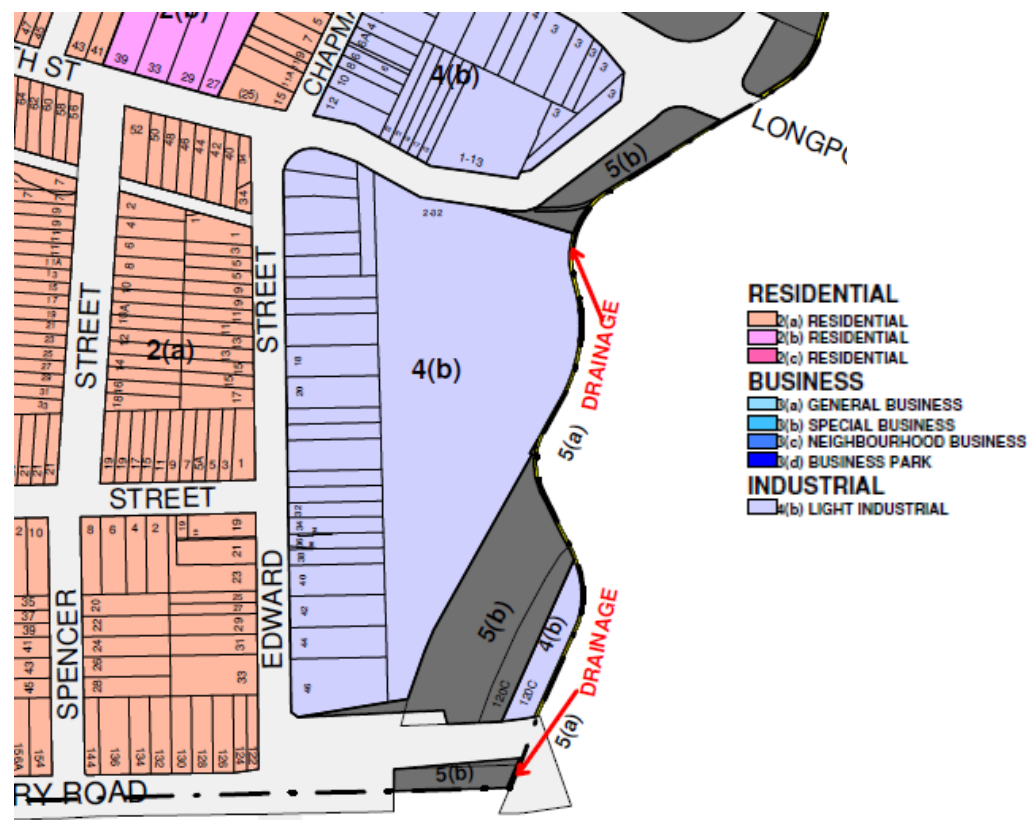


Figure 3: Current zones under Ashfield LEP 1985.

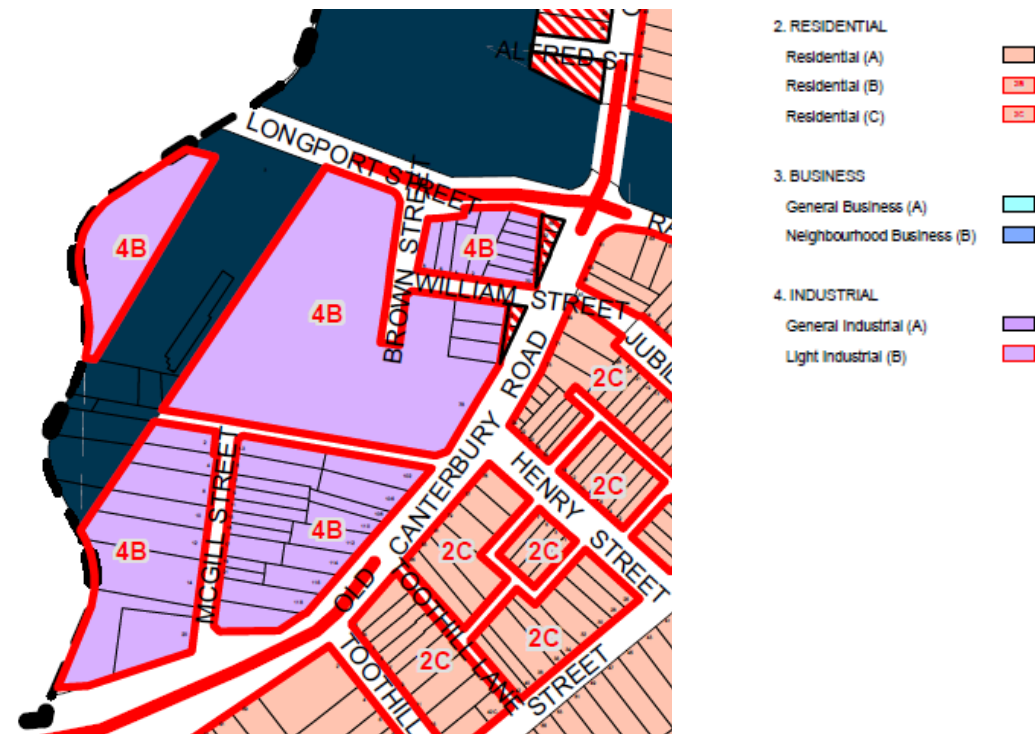


Figure 4: Current zones under Marrickville LEP 2001.

The site adjoins the proposed Greenway (Figure 5) for which a Master Plan has been prepared and adopted to convert the Rozelle freight rail line into a pedestrian and cycleway link as part of the proposed extension of light rail services along the former freight rail corridor.

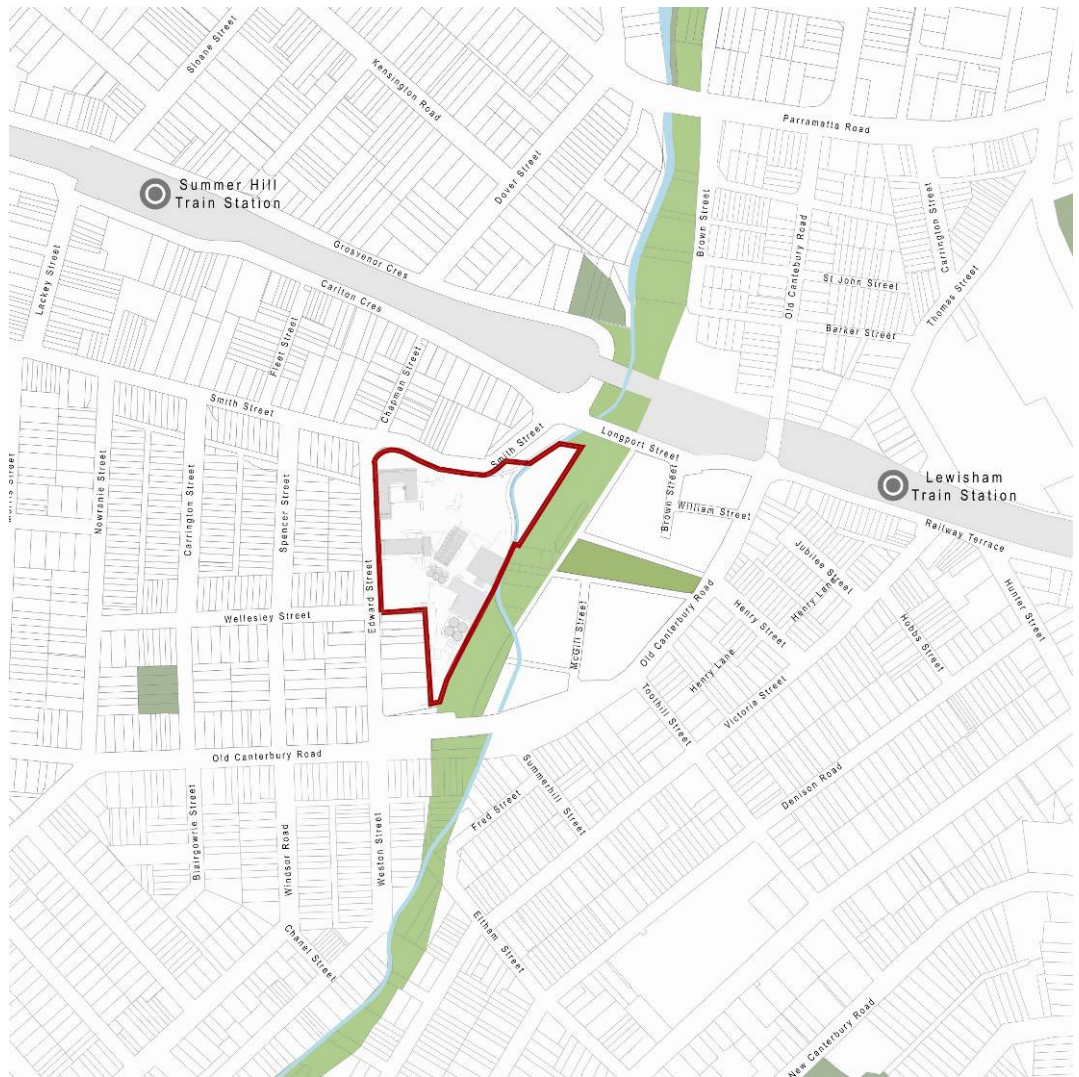


Figure 5: Site context and location adjoining the Greenway corridor.

In a broader context (Figure 6) the site is located within 7km of the Sydney CBD and enjoys proximity and access to the major centre of Burwood and the town centres of Marrickville and Leichhardt.

The site by virtue of its geographic location also enjoys excellent accessibility to the specialised centre of Sydney Airport and access to a broad range of retail, commercial, recreation, education and health services, all located within a 5km radius from the precinct.

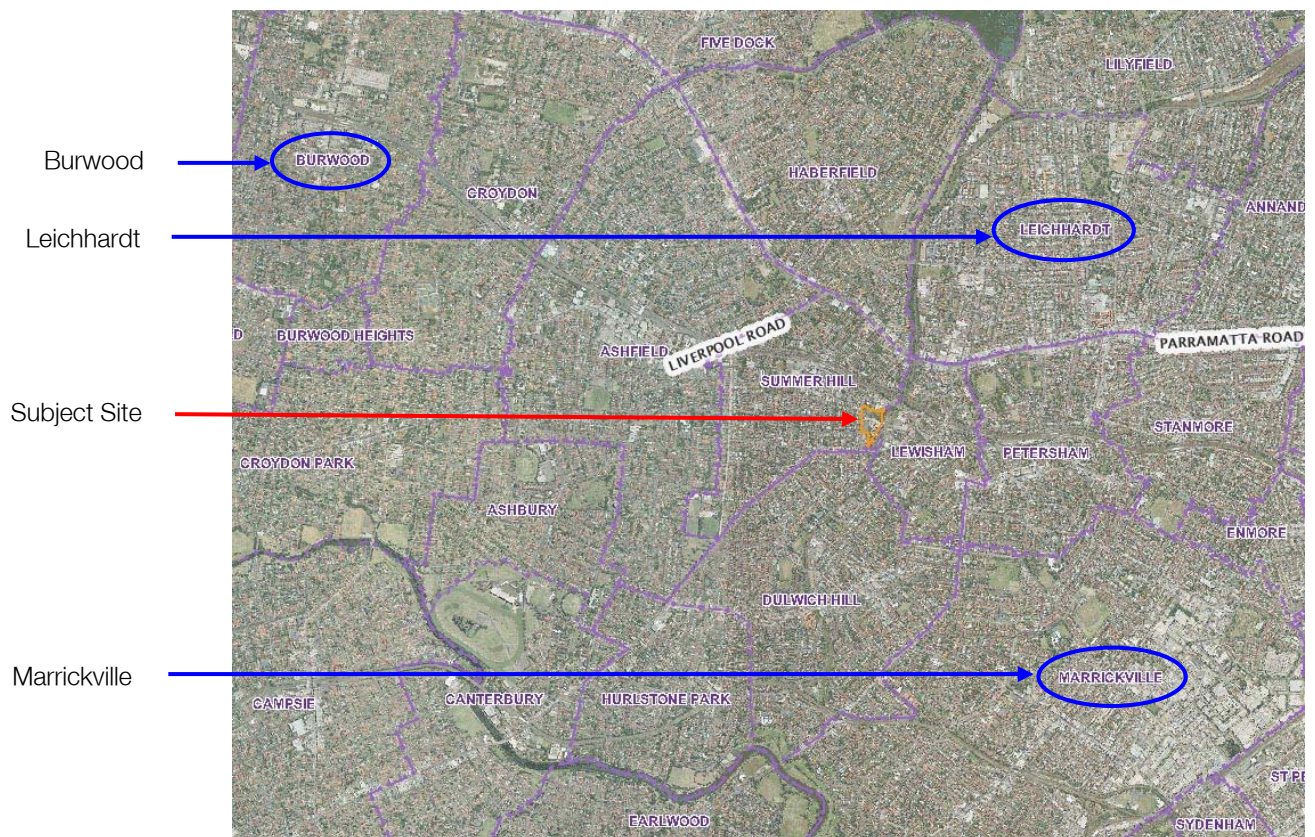


Figure 6: Location of Summer Hill Flour Mills in the regional context (Source: ©www.six.lands.nsw.gov.au).

3.0 STRATEGIC PLANNING CONTEXT

3.1 Metropolitan Plan for Sydney 2036

The Sydney Metropolitan Strategy (the Metro Strategy) was released in 2005 and updated in December 2010 by the Metropolitan Plan for Sydney 2036. The strategy outlines State Government policy for the future development and growth of the Sydney Region. A number of specific objectives and actions are applicable to the consideration of the Concept Plan.

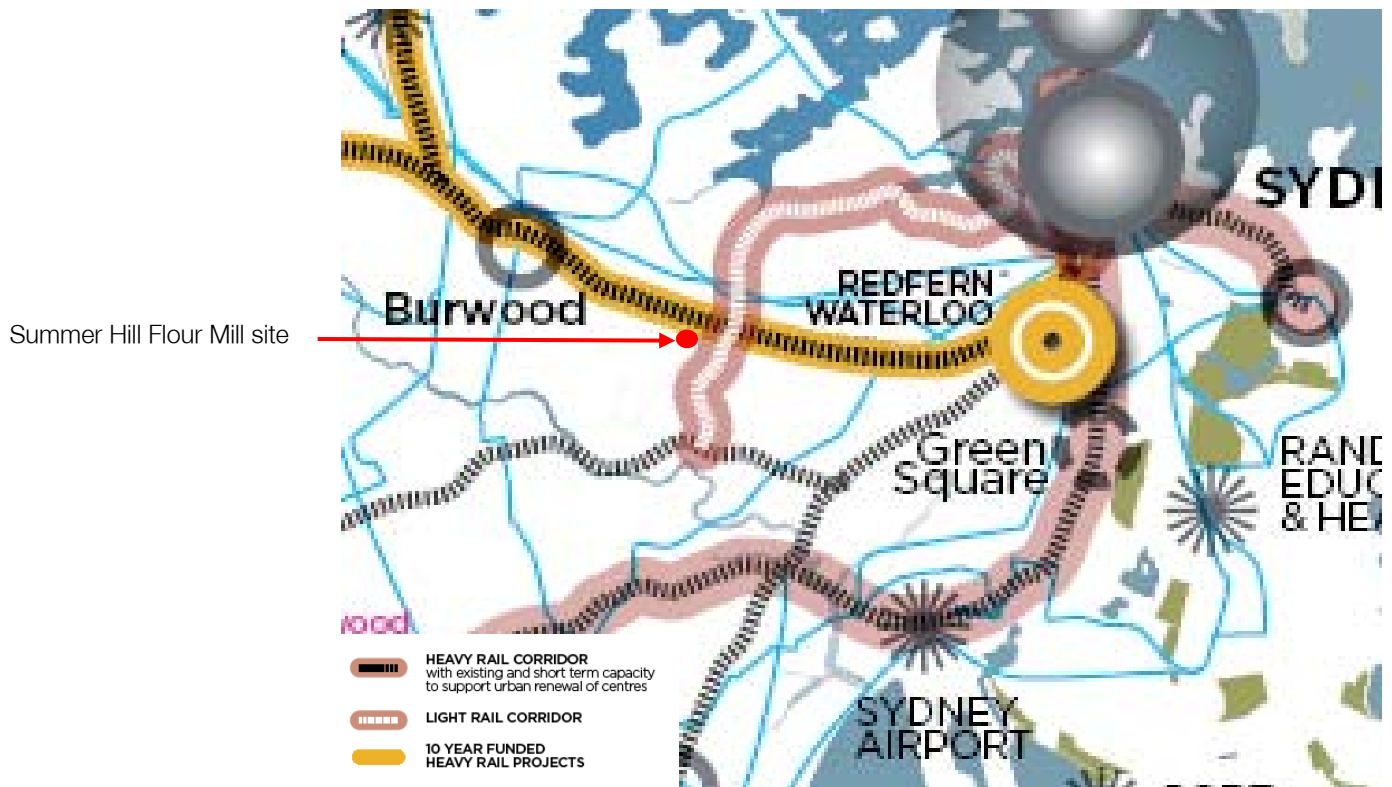


Figure 7: Extract Figure B5 Potential Urban Renewal Opportunities supported by the Rail Network (Source:© Metropolitan Plan for Sydney 2036 December 2010).

3.1.1 Contain the Urban Footprint

Objective A3 seeks “to contain the urban footprint and achieve a balance between greenfields growth and renewal in existing urban areas”.

This objective is supported by objective D1.1 which seeks to “Locate at least 70% of new housing within existing urban areas and up to 30% of new housing in new release areas”.

The site is within an established urban area well serviced by urban infrastructure, services and facilities. The proposed adaptive re-use and development of the site for a mixed use development is consistent with this objective.

3.1.2 Locate 80% of all New Housing within Walkable Catchments

Objective B1.3 is to “Aim to locate 80 per cent of all new housing within the walking catchments of existing and proposed centres of all sizes with good public transport”.



The site is located within the walkable catchment of the existing centres of Summer Hill and Lewisham. Both of these centres are also serviced by City Rail passenger services as well as Sydney Buses bus routes. In addition the site is located adjacent to the recently approved Inner West light rail extension and the proposed Lewisham West stop. The approval of the light rail extension includes the provision of the Greenway and pedestrian cycleway running generally parallel to the light rail. All of the proposed housing as well as the proposed retail and office space will be within the walkable catchment of all these transport options.

3.1.3 Investigate a Program for High Quality Urban Renewal

While the site is not within a specific area programmed for urban renewal, the location and site characteristics are consistent with objective B3 which is "To plan for new centres and instigate a program for high quality urban renewal in existing centres serviced by public transport".

The locality is currently serviced by City Rail passenger services and the site of the proposed development is located adjacent to the Inner West light rail extension and the proposed Lewisham West stop.

The proposed urban renewal of the land based upon the excellent accessibility to transport options is consistent with these objectives.

3.2 Draft Inner West Subregional Strategy

The Draft Inner West Subregional Strategy was exhibited in 2007, and remains in draft form. Under the Draft Inner West Subregional Strategy the land the subject of this EA and located within the Ashfield Council area was identified as Category 1 employment land which should be retained for industrial uses.

The key directions and targets identified in the Draft Inner-West Subregional Strategy of relevance to the precinct include:

- IW A1.1.1 – provide sufficient zoned commercial and employment land to meet the employment capacity targets of 500 new jobs
- IW A 1.9.1 – Explore opportunities to revitalise strategic employment lands
- IW B4.2.1 – undertake integrated land use and transport planning to ensure that opportunities to benefit from transport infrastructure investment are realised
- IW C1.3.1 – Plan for sufficient zoned land to meet dwelling targets, with 2000 additional dwellings for Ashfield required
- IW C2.1.1 – ensure the location of new dwellings maintains the subregions performance in increasing the proportion of people living within 30 minutes by public transport of a Strategic Centre
- IW C2.1.2 – Provide capacity for the significant majority of new dwellings to be located in strategic and local centres
- IW C2.2.1 – Review the capacity for future dwelling growth in strategic and local centres and investigate potential major sites for residential development within centres
- IW D3.1.1 – continue to upgrade walking and cycling facilities to improve everyday access within and between neighbourhoods

A redevelopment of the Summer Hill Flour Mill site to mixed uses would complement the approach taken by Marrickville Council for the McGill Street Precinct and lead to a complementary revitalisation of this former industrial precinct. The Concept Plan demonstrates how the adjoining land not covered by the Concept Plan and not owned by EG Funds Management in Edward Street could also be equitably redeveloped for mixed use purposes.



The proposed Concept Plan provides consistency across the boundary of the adjoining local government areas and resolves the current inconsistency between the two draft subregional strategies which classify the industrial land in Marrickville as Category 3 land and the industrial land in Ashfield as Category 1.

A mixed use development of the land within both adjoining local government areas would also maximise the potential to capitalise on the positive locational attributes, public transport possibilities and Greenway linkages afforded by the now approved light rail extension.

A mixed use redevelopment is also consistent with the recently released Ashfield Urban Planning Draft Strategy 2010 which supports the investigation of the Summer Hill Flour Mill site for mixed use redevelopment.

It is noted that the Economic Impact Assessment undertaken for the proposal identifies that the retail space proposed could generate 85 to 95 full time and part time retail jobs and the commercial space could generate 115 to 135 office jobs once the development is completed. This contrasts to the 49 mill staff and 75 office staff employed on the site when the mill was operational. The potential generation of 200 to 230 jobs represents a significant contribution to the target of 500 new jobs for the Ashfield LGA under the Draft Subregional Strategy. Similarly the delivery of 280-300 dwellings represents a significant contribution to the target of 2000 additional dwellings for Ashfield.

3.3 Draft South Subregional Strategy

The Draft South Subregional Strategy was exhibited in 2007, and remains in draft form. The industrial zoned land within the Marrickville LGA is identified as Category 3 employment land suitable for investigation for alternate uses.

The key directions and targets identified in the Draft South Subregional Strategy of relevance to the precinct include:

- SO A1.9.1 – Identify and implement measures to manage interface issues between industrial and residential land uses
- SO A1.9.3 – Investigate appropriate uses for employment areas identified as Category 2 or 3 with 500 additional jobs targeted for Marrickville
- SO B2.1.3 – investigate increasing densities in all centres where access to employment, services and public transport are provided or can be provided
- SO C1.3.1 – Plan for sufficient zoned land to meet dwelling targets, with 4150 additional dwellings for Marrickville required
- SO C2.1.1 – ensure the location of new dwellings improves the subregions performance in increasing the proportion of people living within 30 minutes by public transport of a Strategic Centre
- SO D1.2.2 – Investigate measures to deliver increased public transport capacity cost effectively in the South sub-region
- SO D3.1.1 – continue to upgrade walking and cycling facilities to improve everyday access within and between neighbourhoods

The land subject to the draft South Subregional Strategy is identified as Category 3 Industrial land that is suitable for investigation for alternate uses. Consistent with this categorisation Marrickville Council has prepared and adopted a Master Plan for the adjoining McGill Street Precinct. These principles have been incorporated in to the Draft Marrickville LEP 2010 which has completed the statutory exhibition period.



The proposed Concept Plan is consistent with the approach to the locality taken by Marrickville Council in the review of its planning framework.

3.4 Part 3A of the EP&A Act 1979

Projects to which Part 3A of the EP&A Act 1979 apply are identified in Section 75B. The projects to which Part 3A apply include those declared by a State Environmental Planning Policy.

Clause 6 of the SEPP provides that development which in the opinion of the Minister of Planning is development of a kind referred to in Schedule 1 Group 5 is development of a kind to which Part 3A applies if the development is for the purpose of residential, commercial or retail projects with a capital investment value of more than \$100 million.

The proposal has a capital investment value of \$156,200,000 (excluding GST) consistent with the QS report prepared by WT Partnership (Attachment 3) and was declared by the Minister as a project to which Part 3A applies on the 28 October 2010. The declaration included an authorisation under section 75M (1) of the EP&A Act 1979 for the lodgement of a Concept Plan and Project Application for Stage 1 of the proposed development. Approval for the Project Application is not being sought at this time.

4.0 THE CONCEPT PLAN

4.1 Project Vision

The Concept Plan proposes to redevelop the Summer Hill Flour Mill Site for mixed use purposes including the adaptive re-use of the heritage significant buildings and silos on the site.

This outcome would be consistent with the approach taken by Marrickville Council in the adjoining McGill Street Precinct where a comprehensive Master Plan has been prepared and adopted to guide the mixed use development of the land. The exhibited Draft Marrickville LEP 2010 includes land use zones and development controls that are consistent with the McGill Street Precinct Master Plan.

The vision for the site is to expand upon the site opportunities presented by its geographic location, diversity of current building stock and site attributes to create a vibrant mixed use precinct. The development will provide places to live and work as well as opportunities for recreation and community interaction.

The Concept Plan complements and reinforces the vision of the adjoining McGill Street Precinct and the conversion of the goods rail line to light rail use. The Summer Hill Flour Mill site and the McGill Street Precinct will form a focus around a central node created by the light rail station, the Greenway corridor and the east west open space linkage proposed in the McGill Street Precinct Master Plan and in the Concept Plan proposed for the Summer Hill Flour Mill site under this Concept Plan proposal.



Figure 8: The Concept Plan in context with the McGill Street Precinct Master Plan.



4.2 Concept Plan Overview

The proposed Concept Plan has considered and addresses:

- indicative built form and land uses;
- traffic and transport management;
- heritage considerations;
- landscape and open space provision;
- flooding and stormwater management;
- ecologically sustainable development (ESD) and
- development staging.

Consent is sought for the building envelopes, parking locations, site entry locations, internal access roads, open space and pedestrian linkages and the retention and adaptive re-use of the identified buildings and structures. The proposed building heights, setbacks, developable area, land uses and urban design principles of the Concept Plan derive from the Concept Plan Report undertaken by Hassell. The Concept Plan Report is included at Attachment 1.

4.3 Scope of Requested Concept Plan approval

The scope of the approval sought includes:

- the demolition of the rail sidings and encroachments into the RailCorp rail corridor;
- demolition of the ancillary building to the north of the “Mungo Scott” building;
- demolition of the administration buildings and associated car parking areas;
- a new network of public streets and publicly accessible open space;
- the adaptive re-use of the existing Mungo Scott mill building, two sets of concrete silos, the former electricity substation building, amenities building and former office building attached to the Mungo Scott building.
- retention and re-use of the Mungo Scott mill building for ground level retail uses and commercial office spaces in the upper levels, with possible loft style apartments in the uppermost level;
- identification of the location for active uses and public domain interaction
- a new nine level residential building to the south of the Mungo Scott Building replacing the wheat store building;
- in the north east corner of the site below the Longport Street overbridge will be new buildings ranging between 5 and 10 storeys with access to Longport Street across RailCorp land;
- new four to six level residential buildings to the east of the Edward Street terraces which frame the open space and public access into the site off Smith Street;
- a new six level residential building in the southern most portion of the site; and
- location of basement car parks and basement entries.

4.4 Concept Plan Numeric Overview

The proposed buildings proposed under the Concept Plan will accommodate:

- 280-300 dwellings in new buildings and in adapted and re-used buildings in a mix of one, two, three and four bedroom dwellings;
- 3,500-4,000m² of commercial space
- 2,500-2,800m² of retail space
- 450-500 basement car parking spaces below the new buildings
- 50-70 on-street car spaces
- 8,400m² of publicly accessible open space
- publicly accessible linkages to the Lewisham West light rail stop



- new vehicle and pedestrian access points from the Smith Street and Edward Street frontages of the site.

A summary of the proposed development mix and FSR is provided in Table 2 below

| | | |
|---------------------|-------------------------------------|--|
| Site Area | | 24,738m² |
| GFA | Residential Commercial Retail | 29,000-33,200 m ² 3,500-4,000 m ² 2,500-2,800 m ² |
| Total | | 35,000-40,000 m² |
| FSR | | 1.4:1 to 1.6:1 |
| Dwelling Mix | | |
| Type | Number | Mix% |
| 1 bed | 115-125 | 35-45 |
| 2 bed | 125-140 | 40-60 |
| 3 bed | 22-30 | 5-10 |
| 4 bed terrace | 14-18 | |
| Total | 280-300 | |

Table 2: Numeric summary of the Concept Plan.

The Concept Plan does not include the pocket of industrial properties at 34-46 Edward Street. The Concept Plan however has demonstrated the ability of these properties to be redeveloped in the future, including the provision of new access roads to service these sites.

4.5 Indicative Built Form and Land Uses

The Concept Plan determines the proposed building heights, locations and land uses based upon the urban design principles prepared for the site.

Figure 9 is an extract from the Concept Plan Report prepared by Hassell (Attachment 1) and shows the proposed building heights in storeys in the context of the proposed heights of buildings under the adopted master plan for the adjoining McGill Street Precinct.

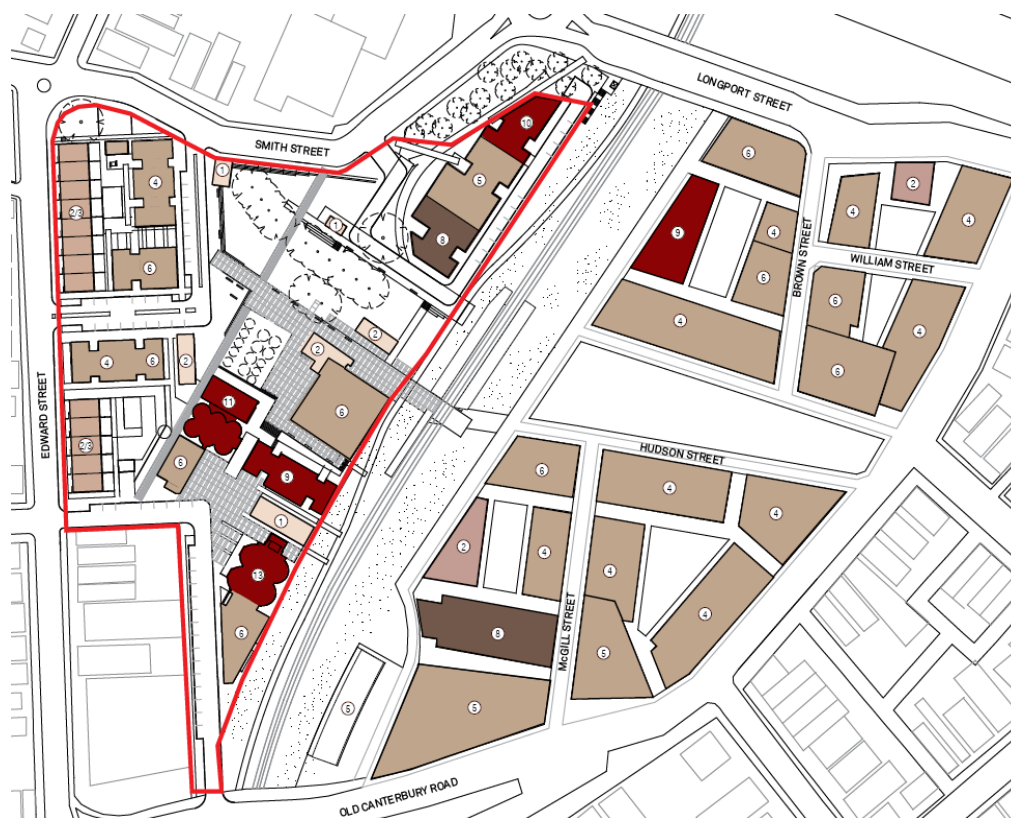


Figure 9: Proposed building heights in storeys in context with McGill Street Precinct Master Plan.

Figure 10 is an extract from the Concept Plan Report prepared by Hassell (Attachment 1) and shows the proposed building uses, and most importantly the focus of ground floor retail and commercial uses to address the pedestrian circulation and open space areas. These active uses are shown in the context of the proposed uses of buildings under the adopted master plan within the adjoining McGill Street Precinct.

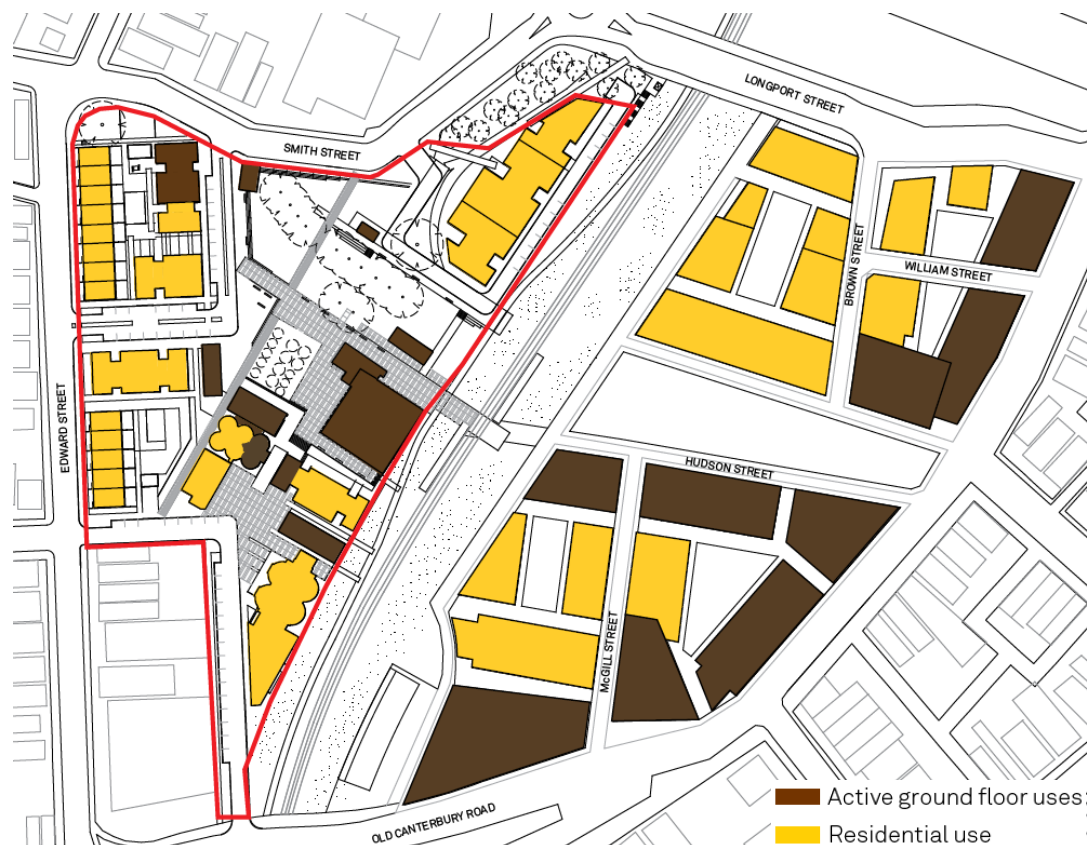


Figure 10: Plan showing the distribution of residential and ground floor active retail/commercial uses.

4.6 Development Staging

The Concept Plan identifies four stages for the development of the site. It is intended that a subsequent Project Application will be lodged for proposed stage one development as shown in the staging plan and comprising predominantly residential development within the north western corner of the site on Smith and Edward Streets. It is noted that DGRs have been issued for this stage of the proposed development.

Figure 11 is an extract of the proposed staging within the Concept Plan Report prepared by Hassell (Attachment 1).



Figure 11: Extract of the proposed staging of the development.

4.7 Traffic and Transport Management

The extract from the Concept Plan prepared by Hassell at Figure 12 demonstrates the connectivity and permeability of the site to pedestrians and the proposed vehicle servicing patterns proposed for the site.

The Concept Plan provides multiple pedestrian access points into the site which have been configured to minimise conflict with vehicular traffic movements. The vehicle circulation routes have been configured to avoid the creation of “short cuts” while maximising the permeability of the site. The road pattern and layout has been configured to provide all servicing and access to car parking basements from within the site to avoid individual driveways having to be provided in existing streets.

The Concept Plan is supported by a detailed TMAP prepared by ARUP (Attachment 4). The TMAP identifies proposed transport infrastructure upgrades, car parking requirements, vehicle access points and assesses traffic impacts including intersection performance.



Figure 12: Pedestrian linkages and traffic access.



4.8 Pedestrian Movement and Public Roads

The pedestrian network to be established provides multiple access paths for pedestrians wishing to visit the site or for those wishing to traverse the site for access to the light rail stop or to access the Greenway. The pedestrian access paths are to be provided by a combination of proposed public roads and publicly accessible paths, urban plazas and landscaped open space areas.

The Concept Plan proposes to facilitate the construction and dedication of the new access streets from Edward Street, Old Canterbury Road and Smith Street as public roads. The proposed road widths accord with the roads widths in the vicinity. The provision of these streets as public roads facilitates public access into and through the site as well as for the implementation of restricted parking schemes to accommodate the future light rail stop and prevent spaces being lost to all day commuter car parking.

The northern vehicle access from Smith Street proposed to service Stage 4 includes an elevated timber bridging structure. This access has been designed to avoid impeding overland flow paths into the Hawthorne Canal, and as it is not typical public road construction is not proposed to be dedicated as a public road. This access would remain in the ownership of the resulting development with resulting maintenance responsibility. This access would be publicly accessible.

Proposed Stage 4 also includes the construction of a pedestrian access over RailCorp land to Longport Street to afford an emergency flood evacuation path which could also provide day to day pedestrian access. The provision of this access over RailCorp land has been the subject of a direct request for in principle agreement for its implementation and construction.

4.9 Heritage Considerations

A detailed Heritage Impact Assessment and Statement of Heritage Impact have been prepared by John Graham and Associates (Attachment 5). The assessment has considered the heritage significance of the buildings on site, the suitability of the proposed re-uses of the structures to be retained and the suitability of the proposal to demolish the structures identified to be removed from the site.

As demonstrated in Figure 13 the Concept Plan seeks to re-use and interpret much of the existing building fabric on-site and the significant landscape treatment from the Smith Street access.



Figure 13: Identification of retained and reused buildings of heritage significance.

The site has also been subject to an Aboriginal Archaeological Assessment prepared by AHMS (Attachment 14), a Machinery and Equipment Heritage Assessment prepared by Godden Mackay Logan (Attachment 15) and a Historical Archaeological Assessment prepared by AHMS (Attachment 16).



4.10 Flooding and Stormwater Management

A detailed drainage and flood assessment has been undertaken by APP for the proposed development (Attachment 6). The investigations have had particular regard to potential flooding of the Hawthorne Canal. The results of these investigations and considerations have been included within the Concept Plan providing allocations for the required overland flow paths and stormwater management.

In addition to the technical management of stormwater flows and storm events, the proposed Concept Plan has been prepared having regard to the inclusion of stormwater harvesting and re-use and overall water demand reductions. These initiatives are proposed in conjunction with the imbedding of water sensitive urban design (WSUD) principles into the Concept Plan to guide and inform future Project and Development Applications for the site.

The design of the northern most access way is proposed as a bridging structure which avoids impeding overland flow paths into the Hawthorne Canal and the creation of a barrier that could cause water to back up higher in the catchment.

The Concept Plan also seeks to provide an access across RailCorp land to Longport Street from the building in Stage 4 to provide a flood free evacuation path. The access could also function as a day to day pedestrian access from Longport Street to facilitate increased pedestrian access options to the light rail stop and the Greenway.

4.11 Open Space Provision

The Concept Plan proposes approximately 8,400m² (34% of the site) as publicly accessible open space comprising a large area of landscaped open space centred upon the avenue of trees to be retained off Smith Street and urban plaza areas. In addition approximately 5,000m² (20% of the site) is proposed to be provided as new streets, footpaths, plazas and landscaped verges.

The final status of these spaces as public open space or as publicly accessible space is yet to be determined and will require further discussions with Council at Project or Development Application stage.

Despite the final ownership status the pedestrian pathways, landscaped open space areas and urban plazas have been designed to facilitate and encourage public access, casual recreation and relaxation and to foster a sense of community and public interaction in an attractive urban environment.



Figure 14: Proposed landscape and public domain treatment.

4.12 ESD

An ESD report has been prepared by ARUP (Attachment 10). The report has considered the range of strategies that can be implemented into the design. The report has identified that the Concept Plan provides significant flexibility for the inclusion of a range of passive and active initiatives that are facilitated by the careful consideration that has been given to the site layout to ensure access to natural light and ventilation for the proposed residential buildings.

The natural advantage of the site in relation to access to public transport options and proposed pedestrian/cycleways supports the ability of the proposed development to achieve high levels of sustainability.



4.13 Statement of Commitments

As required by the DGRs the EA is supported by a Draft Statement of Commitments. The Draft Statement of Commitments is included at Attachment 19. Provided below is a summary of the Draft Commitments for the Concept Plan.

1. Construction Management: The proponent will ensure that a Construction Management Plan is prepared including, but not limited to the methods of soil and sedimentation protection, restriction of public access, vegetation protection, construction, traffic management, crane height and location details and the like.
2. BCA Compliance: All buildings will be designed in accordance with the Building Code of Australia.
3. Augmentation of Utilities: The approval for connection to existing utility service will be obtained, and any required augmentation works will be undertaken.
4. Section 94 Contributions: Section 94 Contributions relevant to the proposal will be made in accordance with the Section 94 Contribution Plans for Ashfield and Marrickville Council, as applicable whichever is relevant consistent with the rates detailed at Section 5.16 of the Environmental Assessment.
5. Public Domain: Public access will be provided through the site providing access over and through the open space from Smith Street affording access to the Lewisham West light rail stop. The access will include the use and enjoyment of the open landscaped areas off Smith Street and the proposed urban plazas around the reused buildings that are to provide ground floor active uses.
6. Remediation of Land: If necessary a Remedial Action Plan will be prepared and audited upon implementation.
7. Transport Management: The relevant intersection and traffic management upgrades identified in the TMAP prepared by ARUP (Attachment 4) attributable to the development will be implemented for each relevant stage.
8. Car Share: At least one parking space will be made available for use by car share scheme vehicles.
9. Bicycle Facilities: Bicycle facilities and storage in accordance with Council's standards will be provided on-site.
10. Ecologically Sustainable Development (ESD): ESD principles and strategies will be implemented for the project consistent with the ESD Strategy prepared by ARUP (Attachment 10).
11. Water Sensitive Urban Design (WSUD): WSUD measures will be implemented in accordance within the Drainage/Water Management/Flooding/ Utilities report prepared by APP (Attachment 6).
12. Flood Management: The flood management measures will be implemented in accordance within the Drainage/Water Management/Flooding/ Utilities report prepared by APP (Attachment 6).
13. Noise and Vibration Mitigation: The noise and vibration mitigation measures will be implemented in accordance with the Noise and Vibration Assessment undertaken by Atkins Acoustics (Attachment 9)
14. Aboriginal Archaeology: The recommendations and requirements of the Aboriginal Archaeology assessment undertaken by AHMS (Attachment 14) will be implemented.



5.0 DIRECTOR GENERAL'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

5.1 Relevant EPIs Policies and Guidelines to be Addressed

The relevant EPIs and policies to be addressed are detailed at Appendix A of the DGRs. Each of the matters identified is addressed in the following sections. Table 3 provides a summary of the key Issues listed in the DGRs and identifies where each of these requirements has been addressed within the EA.

| Key Issues | Response Location |
|---|--|
| 1. Relevant EPI's policies and Guidelines: <ul style="list-style-type: none"> • Objects of the EP&A Act 1979 • NSW State Plan • Draft Inner West Subregional Strategy • Draft South Subregional Strategy • SEPP (Major Development) 2005 • SEPP (Building Sustainability Index: BASIX) 2004 • SEPP No. No 65—Design Quality of Residential Flat Development • SEPP (Infrastructure) 2007 • SEPP No 55—Remediation of Land • Draft SEPP (Competition) (2010) • Ashfield LEP 1995 and Ashfield DCP 2007 • Marrickville LEP 2001 and Draft LEP 2010 • McGill Street Precinct Master Plan • Transport Matters | <p>Section 5.1.1</p> <p>Section 5.1.2</p> <p>Section 3.2</p> <p>Section 3.3</p> <p>Section 5.1.5</p> <p>Section 5.1.6</p> <p>Section 5.1.7</p> <p>Section 5.1.8</p> <p>Section 5.1.9</p> <p>Section 5.1.10</p> <p>Section 5.1.11</p> <p>Section 5.1.12</p> <p>Section 5.1.13</p> <p>Section 5.1.14</p> |
| 2. Built Form/Urban Design | Section 4.5 and 5.2 and Attachments 1 and 5 |
| 3. Land Use | Section 4.5 and 5.3 |
| 4. Public Domain/Open Space | Section 4.11 and 5.4 and Attachment 1 |
| 5. Environmental and Amenity Impacts | Section 5.5 and Attachments 1 and 9 |



| Key Issues | Response Location |
|---|---|
| 6. Transport and Accessibility (Construction and Operational) | Section 4.7 and 5.6 and Attachment 4 |
| 7. Economic Impact Assessment | Section 5.7 and Attachment 8 |
| 8. Noise and Vibration | Section 5.8 and Attachment 9 |
| 9. Ecologically Sustainable Development (ESD) | Section 4.12 and 5.9 and Attachment 10 |
| 10. Heritage and Archaeological | Section 5.10 and Attachments 5, 14, 15 and 16 |
| 11. Drainage/Water Management/Flooding | Section 4.10 and 5.11 and Attachment 6 |
| 12. Groundwater Management | Section 5.12 and Attachment 7 |
| 13. Rail Impacts | Section 5.13 |
| 14. Contamination | Section 5.14 and Attachment 13 |
| 15. Flora and Fauna | Section 5.15 and Attachments 11 and 12 |
| 16. Contributions | Section 5.16 |
| 17. Consultation | Section 5.17 and Attachment 17 |
| 18. Utilities | Section 5.18 and Attachment 6 |
| 19. Staging | Section 4.6 and 5.19 and Attachment 1 |
| 20. Statement of Commitments | Section 4.13 and Attachment 19 |

Table 3 Location of responses to DGRs Key Issues

5.1.1 Objects of the EP&A Act 1979

The objects of the EP&A Act 1979 are provided below in Table 4, along with an assessment of the proposal against each object.

| Object | Consideration |
|---|---|
| (a) to encourage: | <p>The proposal represents sound management of existing urban land to provide additional housing, employment and recreational opportunities in a location that can utilise existing and future transport infrastructure as well as existing utility capacity.</p> <p>The proposal allows for the retention and re-use of a number of buildings with local heritage significance, that while not listed heritage items are worthy of retention, both from reflecting and maintaining past uses, utilising the embodied</p> |
| (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment, | |



| Object | Consideration |
|---|---|
| | energy in the buildings and the structures to be adapted and re-used. |
| (ii) the promotion and co-ordination of the orderly and economic use and development of land, | The proposal facilitates the re-use of currently redundant land to provide for housing, employment and recreation opportunities in a location that is well serviced by transport and necessary urban support infrastructure and facilities. |
| (iii) the protection, provision and co-ordination of communication and utility services, | The proposal is able to take advantage of exiting and proposed infrastructure in an existing urban area that is no longer viable for light industrial use. |
| (iv) the provision of land for public purposes, | The proposal includes the provision of new public roads to facilitate access to the Inner West light rail extension and a publicly accessible open space and pedestrian linkage through the site. |
| (v) the provision and co-ordination of community services and facilities, and | The site is well located and accessible to a range of services and facilities including schools, hospitals, tertiary education, open space, and retail and commercial services to support the incoming population and workforce. |
| (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and | The proposal has been assessed to have no adverse impact upon native flora and fauna or any threatened or endangered communities or the habitat of any threatened or endangered communities or populations. |
| (vii) ecologically sustainable development, and | The project has been assessed as being able to incorporate ESD measures and involves the retention and reuse of existing structures in a transit oriented development. |
| (viii) the provision and maintenance of affordable housing, and | The proposal contributes to the diversity and availability of housing stock in a well serviced accessible and desirable location. |
| (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and | The proposal is a Major Project for which the Minister is the consent authority. Ashfield and Marrickville Councils have been consulted on the preparation of the DGRs and will be further consulted when the proposal is publicly exhibited. |
| (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment. | The proposal has been the subject of preliminary public consultation and will be the subject of further consultation consistent with the DGRs issued for the project. |

Table 4: Assessment against the objects of the EPA Act 1979.



5.1.2 NSW State Plan

The State Plan is the state government strategy for the delivery of services to the people of NSW. A number of initiatives and goals are relevant for consideration with the Concept Plan. The relevant matters are addressed below.

Better transport and Liveable Cities:

- *improve the public transport system, and Increase the share of commute trips made by public transport.*

The provision of 280-300 dwellings within an existing walkable catchment to two railway stations and a proposed new light rail station adjacent to the proposed development will encourage and facilitate increased commuter use of public transport consistent with the State Plan target.

Increase walking and cycling:

- *increase the mode share of bicycle trips made in the Greater Sydney region, at a local and district level, to 5% by 2016.*

The proposal includes the provision of through pedestrian linkages to the proposed public transport facilities and will be adjacent to the proposed pedestrian and cycleway to be implemented as part of the extension of the Inner West light rail. Ready access to these facilities from proposed housing and employment opportunities will support walking and cycling consistent with the State Plan target.

Increase the number of jobs closer to home:

- *increase the percentage of the population living within 30 minutes by public transport of a city or major centre in Metropolitan Sydney.*

The proposal will be within 30 minutes by public transport to the Global Sydney centre and the major centre of Burwood consistent with the State Plan target.

5.1.3 Draft Inner West Subregional Strategy

The Draft Inner West Subregional Strategy has been addressed in detail at section 3.2 of this EA.

5.1.4 Draft South Subregional Strategy

The Draft South Subregional Strategy has been addressed in detail at section 3.3 of this EA.

5.1.5 State Environmental Planning Policy (Major Development) 2005

State Environmental Planning Policy (Major Development) 2005 identifies development that is of state significance. Clause 6 of the SEPP provides that development that in the opinion of the Minister of Planning is development of a kind referred to in Schedule 1 Group 5 is development to which Part 3A applies if the development is for the purpose of residential, commercial or retail uses with a capital investment value of more than \$100 million.

The proposal is a development to which Part 3A of the EPA Act 1979 applies in accordance with the Major Development SEPP. The proposal is a mixed use development which has a capital investment value of \$156,200,000 (excluding GST).



5.1.6 State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

SEPP BASIX seeks to ensure that water and energy consumption rates are reduced. The SEPP includes water and energy consumption reduction targets that should be met by new development.

The ESD assessment and stormwater management strategy demonstrate that the Concept Plan can readily achieve compliance with the requirements of SEPP (BASIX) in future Project Applications or Development Applications.

5.1.7 State Environmental Planning Policy No. No 65—Design Quality of Residential Flat Development

State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development will apply to the residential components of the Concept Plan application.

The preparation of the Concept Plan has had regard to these principles particularly in relation to energy efficiency and building performance, building separation and integration with the locality.

The Concept Plan Report includes a Design Verification Statement from the Project Architect (Attachment 1) and an assessment against the ten design principles from Part 2 of SEPP 65.

The assessment confirms that the design is consistent with the design principles and the layout of the Concept Plan will facilitate compliance being achieved in subsequent Project Applications or Development Applications for the site. An assessment of the concept Plan against the design quality guidelines of the SEPP 65 Residential Flat Design Code is included in Table 5 below

| SEPP 65 – Residential Flat Design Code | | | |
|---|--|---|-------------------|
| PART 1 – LOCAL CONTEXT | | | CONSISTENT |
| Building height | To ensure the proposed development responds to the desired scale and character of the street and local area, and to allow reasonable daylight access to all developments and the public domain. | The proposed buildings maintain the current maximum height (the silos). The arrangement of proposed buildings and building heights responds to the surrounding existing context and the McGill Street Precinct Masterplan. | Yes |
| Building depth | Generally, an apartment building depth of 10 – 18 metres is appropriate | The proposed building modules will support achieving this control. | Yes |
| Building separation | As the building increases in height, differing separation distances are required. For the section of the building up to 12 metres in height, separation between habitable rooms/balconies must be a minimum of 12 metres. | The suggested building separations are achieved as demonstrated in Appendix C, Figure 1.0 of the Concept Plan report prepared by Hassel at Attachment 1. Measures to achieve appropriate levels of sunlight access and privacy have been introduced for existing | Yes |



| SEPP 65 – Residential Flat Design Code | | | |
|---|---|--|-----|
| | | heritage buildings which will be re-used and adapted | |
| Street setbacks | To establish the desired spatial proportions of the street and define the street edge. To relate setbacks to the area's street hierarchy. | The street setbacks proposed respond to the local context and address the streets in a manner consistent with the local character. | Yes |
| Side and rear setbacks | To minimise the impact of development on light, air, sun, privacy, views and outlook for neighbouring properties, including future buildings. | The building forms have been carefully configured to avoid impacts to the private and public domain. | Yes |
| Floor Space Ratio | To ensure that development is in keeping with the optimum capacity of the site and the local area. FSR is not specified in the Design Code. | The site proposes an overall FSR consistent with the adjoining McGill Street Precinct. The FSR of 1.4-1.6:1 is commensurate with the sites proximity to transport and the building mass does not result in adverse amenity impacts. | Yes |
| PART 2 – SITE DESIGN | | | |
| Deep soil zones | A minimum of 25% of the open space area of a site should be a deep soil zone. | Approximately 46% of the site is landscaped area of which 54% is deep soil planting areas. Half of the open space is landscaped and allows for existing and future provision of mature vegetation and plantings. The remaining half of the unbuilt upon areas will be occupied by streets and circulation spaces within which hard surfaces will include pervious surfaces to facilitate groundwater infiltration. | Yes |
| Fences and walls | To define the edges between public and private land. | Low rise fences to Edward Street will be provided. The site's level changes and the required retaining structures in conjunction with the landscape design will be elements used to define edges between public and private areas. Where required low rise fences will be used. | Yes |



| SEPP 65 – Residential Flat Design Code | | | |
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| Landscape design | To add value to residents' quality of life within the development in the forms of privacy, outlook and views, and provide habitat for native indigenous plants and animals. | The site comprises 34% publicly accessible open space and 12% private open space. The layout of these spaces in conjunction with the circulation spaces offers a variety of benefits in regards to opportunities for interaction and access to transport and recreation facilities. | Yes |
| Open space | Communal open space may be accommodated on a podium of roof in a mixed-use building, provided it has adequate amenity. | Publicly accessible and private communal open spaces are proposed with high levels of utility and amenity. | Yes |
| Orientation | To protect the amenity of existing development, and to optimise solar access to residential apartments within the development and adjacent development. | The available Northerly and Easterly aspects have been maximised. | Yes |
| Planting on structures | To ensure sufficient soil depth is provided to facilitate adequate planting. | Approximately 27% of the site is available for Deep Soil Planting. Where required additional on slab tree and shrub planting will be provided. | Yes |
| Stormwater management | To ensure adequate stormwater management. | The proposal has been designed incorporating WSUD initiatives. | Yes |
| Safety | To ensure residential developments are safe, and contribute to public safety. | The layout of the buildings and allocation of active spaces has been pursued to ensure maximum passive surveillance. | Yes |
| Visual privacy | To provide reasonable levels of visual privacy externally and internally, during the day and at night. To maximise outlook and views from principal rooms and private open space without compromising visual privacy. | Building separation and a variety of measures ranging from balcony screening, louvers and window orientation will ensure that visual privacy is achieved without compromising access to views and outlooks. | Yes |
| Building entry | To create entrances with identity and assist in orientation for visitors | The hierarchy of access points ensures that way finding will be logical and building entrances will be apparent. | Yes |


SEPP 65 – Residential Flat Design Code

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| Parking | To minimise car dependency, whilst still providing adequate car parking | The development is a transit oriented development located adjacent to a new light rail stop and in walking distance to two passenger rail stations and with direct access to the proposed Greenway pedestrian and cycleway network. | Yes |
| Pedestrian access | Connect residential development to the street. Provide barrier free access to 20% of dwellings | Barrier free access is possible to the entrance of all proposed dwellings. | Yes |
| Vehicle access | Limit width of driveways. Locate driveways away from main pedestrian entries, and on secondary streets | Driveway locations have been limited and basement access provided off new interior roads and access ways. | Yes |

PART 3 – BUILDING DESIGN

| | | | |
|------------------|---|---|-----|
| Apartment layout | Depth of single aspect apartment – 8 metres Back of the kitchen not more than 8 metres from a window Width of cross-over apartments over 15 metres deep should be min. 4 metres Apartment sizes: 1 Bed – 50m ² 2 Bed – 70m ² 3 Bed – 95m ² | The building modules can readily comply with these guidelines. | Yes |
| Apartment mix | To provide a diversity of apartment types, which cater for different household requirements now and in the future. | A diversity of apartment types and sizes are proposed including 1 to 3 bedroom apartments and 4 bedroom townhouses. | Yes |
| Balconies | Minimum 2 metres in depth | The building layout can achieve this guideline. | Yes |
| Ceiling heights | Minimum ceiling heights | The building volumes have been designed to support 2.7m ceiling heights. | Yes |
| Flexibility | Encourage housing design that meet the broadest range of the occupants' needs | The proposed building volumes can facilitate the provision of flexible housing. | Yes |



| SEPP 65 – Residential Flat Design Code | | | |
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| Ground floor apartments | To contribute to the desired streetscape of an area Consider accessible units on the ground floor | A mix of active and residential uses at ground floor level is proposed. | Yes |
| Internal circulation | Where units are arranged off a double-loaded corridor, the number of units accessible from a single core/corridor should be limited to 8 | The proposed building volumes can avoid the use of double loaded corridors. | Yes |
| Mixed use | To ensure that the design of mixed use developments maintains residential amenities and preserves compatibility between uses. | The configuration of the mixed uses will facilitate the integration of a range of uses with appropriate amenity. | Yes |
| Storage | To provide adequate storage for everyday household items within easy access of the apartment, and to provide storage for sporting, leisure, fitness and hobby equipment. At least 50% of required storage should be within each apartment. | The proposed building volume can facilitate compliance with the guideline. | Yes |
| Acoustic privacy | To ensure a high level of amenity by protecting the privacy of residents within residential flat buildings both within the apartments and in private open spaces | Acoustic recommendations have been provided to appraise the acoustic impacts on the site. | Yes |
| Daylight access | Min. 3 hours direct sunlight between 9 am, and 3 pm midwinter to living rooms and private open space of at least 70% of units. Single aspect apartments with SW-SE aspect limited to 10% | As demonstrated in the solar studies these guidelines can be achieved providing in excess of the required two hours of solar access in mid-winter. | Yes |
| Natural ventilation | Limit building depth from 10 to 18 metres 60% should be naturally cross ventilated 25% of kitchens should have access to natural ventilation | The building volumes will not preclude future compliance with these guidelines. | Yes |



| SEPP 65 – Residential Flat Design Code | | | |
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| Awnings + signage | To provide shelter, and ensure awnings are consistent with streetscape | Shelter through the site is proposed. | Yes |
| Facades | Facades should define and enhance the public domain | The building mass frames the existing and proposed public domain and incorporates an architectural language that further improves the experience will be developed in subsequent applications. | Yes |
| Roof design | To integrate the design of the roof into the overall façade | This can be achieved. | Yes |
| Energy efficiency | To reduce the necessity for mechanical heating and cooling | Energy efficiency initiatives have been included in the concept package. | Yes |
| Maintenance | To ensure long life and ease of maintenance for the development | The proposal seeks to re-use a significant amount of existing building material on site. New building can comply with the p | Yes |
| Waste Management | Supply WMP Allocate storage area | Future Development Applications or Project Plans can comply with the durability guidelines. | Yes |
| Water Conservation | Reduce mains consumption, and reduce the quantity of stormwater runoff | Water reduction measures have been included in the concept plans. | Yes |

Table 5 Assessment against the Residential Flat Design Code

5.1.8 State Environmental Planning Policy (Infrastructure) 2007

The Concept Plan includes 280-300 dwellings and on-site car parking for 500-620 vehicles. Clause 104 of the SEPP requires that development of 300 or more dwellings with access to any road is required to be referred to the RTA. Further any development that accommodates 200 or more vehicles is required to be referred to the RTA. As the Concept Plan anticipates a parking capacity of 500-620 vehicles, referral to the RTA will be required.

A detailed TMAP has been prepared by ARUP which has included consultation with the relevant transport agencies, including the RTA.

The TMAP has identified the suitability of the transport infrastructure to support the proposed development including suggested upgrades to traffic management facilities. It should also be noted that the assessment has included the potential cumulative traffic generation from the redevelopment of the McGill Street Precinct under the proposed Concept Plan for 78-90 Old Canterbury Road, Lewisham (MP08_0195) and the Master Plan for the McGill Street Precinct adopted by Marrickville Council.



The Concept Plan and Statement of Commitments include proposed upgrades to required transport infrastructure and local area traffic management measures.

The individual stages which will require subsequent Project Plan approval or Development Consent are unlikely to trigger any referral under the provisions of clause 104 of the SEPP.

5.1.9 State Environmental Planning Policy No 55—Remediation of Land

SEPP 55 seeks to promote the remediation of contaminated land in order to reduce risks to human health and the environment. Where land is contaminated, SEPP 55 requires that it be suitably remediated prior to any development occurring on that land. The SEPP contains provisions relating to the level of remediation required, and the consent mechanisms in relation to the remediation works.

A Detailed Environmental Site Assessment prepared by Aargus Australia has been undertaken of the site which has identified that the site can be made suitable for mixed use development and has a low risk to human health. The assessment has included soil sampling and testing. The assessment recommends the preparation of Remedial Action Plan (RAP) for the site which will ensure that the resulting development site is suitable for residential use and occupation. No further development consent is required for the preparation of the RAP and undertaking any required works.

5.1.10 Draft State Environmental Planning Policy (Competition) (2010)

The draft SEPP has been considered in the Economic Impact Assessment (Attachment 8) and has concluded that while the proposed development will have some impact upon the trading level of surrounding existing centres, the impact will not be significant and the impacts will be absorbed with expected normal retail expenditure growth.

5.1.11 Ashfield Local Environmental Plan 1995 and Ashfield DCP 2007

The land covered by the Concept Plan within the Ashfield Council area is zoned 4(b) Light Industrial under Ashfield LEP 1985.

The proposed mixed use development of the land is currently prohibited in this zone. The permissibility of the proposed land uses would need to be established via any Concept Plan approval issued.

The suitability of the site for the proposed development is supported by the Ashfield Council Urban Planning Strategy. The Urban Planning Strategy has been prepared to guide and inform the Draft Ashfield LEP 2010. The draft strategy has been released for public exhibition and comment but has yet to result in the preparation of a Draft LEP for public exhibition.

The strategy includes recommendations to consider a mixed use redevelopment of the Summer Hill Flour Mill Site to revitalise this former industrial land and to provide residential, employment and recreational opportunities on the site.

The proposed Concept Plan is consistent with the recommendation to consider mixed use redevelopment of the site outlined in the draft strategy.

Under the Ashfield LEP 1995, the current 4(b) Light Industrial zone is subject to a maximum FSR of 1:1 pursuant to clause 17. The Concept Plan proposes an FSR of 1.4:1 to 1.6:1. While the proposed FSR exceeds the current control that applies to light industrial development, the



proposed FSR is consistent with what would be anticipated for a mixed use residential development located on a transport corridor in an existing inner urban area.

For comparison, the Draft Marrickville LEP 2010 which applies to part of the subject site and land to the immediate east (the McGill Street Precinct) proposes FSRs ranging from 1.7:1 through to 3:1 on land proposed to be zoned to facilitate mixed use development. The proposed FSR of the Concept Plan of 1.4:1 to 1.6:1 is consistent and appropriate in the local and regional context.

Clause 37 of the Ashfield LEP requires development in the vicinity of heritage items and heritage conservation areas to have regard for the impact of the proposed development on these items. The site is located opposite the Quarantine Ground Heritage Conservation Area. The attached Heritage Assessment and Statement of Heritage Impact (Attachment 5) has had regard to the impact of the proposal on the heritage conservation area and has concluded that the proposed relationship of low rise development along Edward Street and the retention and re-use of the major structures on the site will not detrimentally impact upon the significance of the heritage conservation area.

The provisions of Ashfield DCP 2007 apply particularly in regard to Part C1 Access and Mobility, and Part C11 Parking.

Part C5 Multi Unit Development in Residential Flat Zones is applicable as a guide only as the development is not within a residential flat zone.

As identified in the TMAP prepared by ARUP (Attachment 4) the rates of car parking provision are consistent with the Ashfield DCP 2007 requirements.

In regards to Part C1 Access and Mobility the accessibility of the site and the provision of at grade access throughout the publicly accessible areas has been a fundamental desired outcome for the master planning of the site. There are no constraints to future stages of the development achieving compliance with the provision of accessible or adaptable housing consistent with the requirements of the DCP.

A detailed assessment of the multi unit development provisions has not been provided as approval is only being sought for Concept Plan building envelopes. The proposal has been developed having regard to SEPP 65 design principles and the project architects have confirmed that the proposed building envelopes will support the compliance of future detailed applications for the individual stages in achieving compliance with the amenity requirements of minimum private open space provision, access to natural light and ventilation and solar access.

5.1.12 Marrickville Local Environmental Plan 2001 and Draft Local Environmental Plan 2010

The land covered by the Concept Plan within the Marrickville Council area is zoned 4B Light Industrial (B) under Marrickville LEP 2001.

The proposed mixed use development of the land is currently prohibited in this zone. The permissibility of the proposed land uses would need to be established via the proposed Concept Plan.

The exhibited Draft Marrickville LEP 2010 proposes to zone that part of the land that is within the Marrickville Council area to zone R1 General Residential which would permit the proposed development on this land. The Draft LEP does not apply a height or FSR to the subject land. The proposed height, bulk and scale is however consistent with the adopted McGill Street Precinct Master Plan and the height and FSR controls proposed for the balance of the McGill Street Precinct under the Draft LEP 2010.



Volume 2 of Marrickville Council's Urban Housing DCP would be the applicable guide document. As for the Ashfield DCP consideration, there are no constraints to future stages of the development achieving compliance with the provisions of the DCP and DCP 19 Parking Strategy.

5.1.13 McGill Street Precinct Master Plan

The McGill Street Precinct Master Plan and this Concept Plan can and should be read as complementary strategic approaches to the redevelopment of this former industrial precinct. Both plans have been prepared by Hassell (for different clients) and as a consequence have achieved significant synergies.

The plans are complementary in the provision of through site linkages leading to the new light rail stop. Both precincts are bisected by wide east west open space areas providing access and recreation opportunities for future and existing residents. The distribution of building heights is consistent and complementary and has had regard to the proposed east west open space linkages and the proposed light rail and Greenway to run north south between the precincts.

The proposed Concept Plan is considered to support the McGill Street Precinct Master Plan and to reinforce the public domain advantages that can be achieved in conjunction with the light rail extension.

The Concept Plan Report prepared by Hassell (Attachment 1) includes the required comparison between the McGill Street Precinct Master Plan and the Concept Plan application MP08_0195 for 78-90 Old Canterbury Road, Lewisham. As this comparison demonstrates, many of the synergies between this proposal for the Summer Hill Flour Mill site and the McGill Street Precinct Master Plan are undermined by the proposal for 78-90 Old Canterbury Road. Part 4 of the Hassell Concept Plan Report (Attachment 1) clearly shows that the permeability through both precincts is undermined by the proposal on 78-90 Old Canterbury Road, particularly through the narrowing of the open space link adjacent to Hudson Street and the loss of a clear view through the precinct to the proposed light rail stop. This is considered to be a critical outcome in the longer term use and patronage of the light rail to make the pedestrian travel path both a pleasant experience and an obvious route that the public can utilise to access this transport infrastructure.

The site layout proposed by this Concept Plan and the McGill Street Precinct Master Plan achieves a superior urban design outcome in maximising the potential offered by the light rail stop and the creation of an integrated transport oriented mixed use precinct.

5.1.14 Transport Matters

The "Metropolitan Transport Plan 2010", "NSW Bike Plan 2010", "Planning Guidelines for Walking and Cycling" and the "Integrating Land Use and Transport Policy Package 2001" have all been addressed in the Traffic Management and Accessibility Plan (TMAP) undertaken by ARUP and provided at Attachment 4.

5.1.15 Healthy Urban Development Checklist 2010

The Healthy Urban Development Checklist 2010 was developed by NSW Health to assist in their consideration of major urban development proposals and rezoning applications.

In relation to the relevant matters the checklist addresses, this Concept Plan is considered to be consistent as:



- physical activity will be encouraged due to the proximity to open space and pedestrian cycleways;
- the development will provide opportunities for the provision of a range and diversity of housing types;
- there is excellent availability of public transport;
- employment opportunities will be provided as part of the development;
- community safety and crime prevention are unlikely to be issues of concern given the proposed activation of public domain areas and casual surveillance opportunities;
- open space is incorporated into the development;
- there is excellent access to support and social service infrastructure;
- social interaction will be encouraged via the open space and pedestrian linkages and active common spaces; and
- issues of water quality, noise impacts, light and vibration have been considered in the design development.

5.1.16 Development near Rail Corridors and Busy Roads – Interim Guidelines

These guidelines have been considered in the Noise and Vibration Assessment undertaken by Atkins Acoustic and included at Attachment 9. The assessment has concluded that:

“Based on site measurements, the assessment has shown that building treatments would be required to address road, rail and aircraft noise intrusion. The determining factor in facade treatments in order to meet internal design noise levels for residential and commercial components of the Concept Plan is amelioration of aircraft noise. With effective incorporation of façade treatment to address aircraft noise impacts, the assessment has shown that noise from road and rail noise would be addressed.”

5.1.17 Airports Act 1996 and the Airports (Protection of Airspace) Regulations 1996

Sydney Airport Corporation in responding to the Department of Planning’s request for input into the DGRs advised that no objection was raised to the proposal subject to no structure exceeding 58m above the Australian Height Datum (AHD).

The Concept Plan does not seek approval for any structure higher than 58m AHD. The current height of the tallest structure on the site is at RL 57.6m AHD and this height is not being exceeded.

In regard to the impacts of aircraft noise on the development these requirements have been considered and assessed in the Noise and Vibration Assessment undertaken by Atkins Acoustic and included at Attachment 9.

5.1.18 Threatened Species Conservation Act 1979 and Environment Protection and Biodiversity Conservation Act 1999

A Flora and Fauna Assessment and a Target Long Nosed Bandicoot Survey were undertaken for the site by Travers Environmental (Attachments 11 and 12). The assessments concluded that:

“...the proposed development of 2-32 Smith Street & 16-32 Edward Street, Summer Hill, is unlikely to result in a significant impact on any threatened species, populations or endangered ecological communities or their habitats.

As such no further assessments are considered to be required under the EP&A Act 1979, EPBC Act 1999 or FM Act 1994.”



For completeness the assessment was also referred to the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (reference number: 2011/5859). The referral concluded that on the basis of the assessment undertaken no matters for assessment under the Commonwealth *Environment Protection and Biodiversity Conservation Act* (EPBC) 1999 arise.

Subsequent to the referral, the Commonwealth Department have specifically advised that no matters of concern under the EPBC arise from the proposed development and that no further assessment or consideration is required. The correspondence from the department is included at Attachment 11.

5.2 Built Form/Urban Design

The matters raised in the DGRs in relation to built form and urban design are addressed in the following sections and the Concept Plan Report prepared by Hassell (Attachment 1).

5.2.1 Residential and Heritage Context

A detailed urban design analysis has been undertaken by Hassell as part of the Concept Plan Report which is provided at Attachment 1. The analysis has been prepared having regard to heritage advice on both the subject site and the existing buildings and the surrounding items and places of heritage significance prepared by John Graham and Associates (Attachment 5).

The formulation of the Concept Plan has sought to integrate much of the existing building fabric into the proposed redevelopment as well as landscape elements such as the formal avenue plantings along the Smith Street frontage.

The approach has been to ensure that the existing most prominent structures on the site, the silos, remain the most prominent structures after their adaptation. Similarly, important local views to the Mungo Scott building from the rail line have been retained with the location and orientation of the proposed building envelopes. Expanding upon these principles the proposed building envelopes for new structures fronting Edward Street have been limited to part 2 part 3 storey structures to provide an appropriate urban transition into the site from the surrounding residential context. Importantly in the creation of an integrated transport oriented mixed use precinct the location of buildings, access paths and active uses has been prepared to be consistent and complimentary with the McGill Street Precinct Master Plan adopted by Marrickville Council.

The analysis has concluded that the proposed building envelopes and allocation of land uses are appropriate in the local context.

5.2.2 Retention of Heritage Buildings

The Concept Plan proposes the retention and re-use of a number of site features and structures that have varying levels of heritage significance as detailed within the Heritage Assessment and Statement of Heritage Impact undertaken by John Graham and Associates (Attachment 5).

The buildings to be retained and reused include:

- amenities building (high significance);
- warehouse and packing building – “Mungo Scott” building (high significance);
- flour mill building (high significance);
- mill offices (medium significance);
- electricity substation (medium significance);
- bulk wheat silos – north (low significance);

- bulk wheat silos – south (low significance); and
- landscape planting to Smith Street entrance.

In addition to the physical retention of these structures a number of site features associated with the past use are to be interpreted as part of the development and urban landscape treatment of the site. These include the location of the bank of silos to the east of the Mungo Scott building and the interpretation of the wooden wheat bin building and the potential recycling of the structural timbers on the site.

The assessment has concluded that the approach to the redevelopment and proposed reuse of existing site features and structures is exemplary and results in the loss of little fabric of heritage significance. The proposed method of reuse and interpretation will ensure that the former use of the site will be well understood and clearly evident.

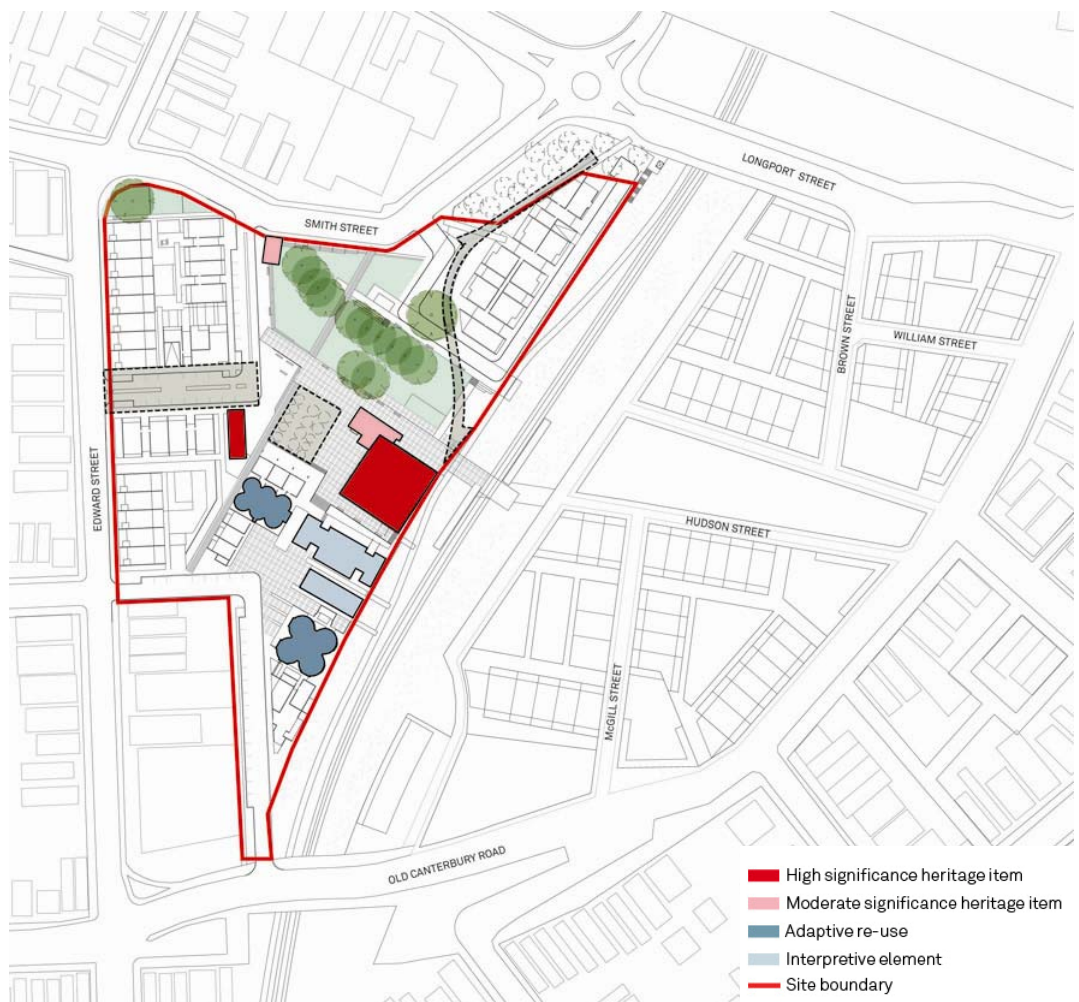


Figure 15: Retained and reused buildings on the site.

5.2.3 McGill Street Precinct Master Plan

This Concept Plan and the McGill Street Master Plan share strong and significant synergies. As detailed within the report prepared by Hassell (Attachment 1) the two plans when read in conjunction will deliver important urban outcomes and benefits to the local area.



Significantly these positive outcomes are:

- the provision of strong east west landscaped pedestrian connectivity to the proposed Lewisham West light rail stop,
- provision of building heights and forms that protect the solar access to proposed public spaces and future residential building envelopes
- revitalisation of the area to provide a mixed use precinct focussed upon a transport node in an area that is also serviced by existing passenger rail services
- provide development that addresses both sides of the proposed Greenway and associated pedestrian cycleway linkage
- provision of similar and compatible maximum floor space ratios and levels of retail and commercial space.

5.2.4 MP08_0195 – 78-90 Old Canterbury Road, Lewisham

The Concept Plan Report prepared by Hassel (Attachment 1) has specifically addressed the relationship of this Concept Plan with the adopted McGill Street Precinct Master Plan and the Concept Plan application for 78-90 Old Canterbury Road.

The analysis identifies that many of the synergies between this Concept Plan and the McGill Street Precinct Master Plan would be lost if MP08_0195 were approved in its exhibited form. Critically the expansive open space linkage between the two precincts focussed upon the new light rail stop would be lost (refer Hassell view analysis Attachment 1).

As detailed within the TMAP prepared by ARUP (refer Table 17 Intersection Results – Attachment 4) the comparison between the scenarios of the development of the Summer Hill Flour Mill site and the McGill Street Precinct consistent with the adopted Marrickville Council Master Plan compared to MP08_0195 has significantly reduced impacts upon the level of service to the intersections in the surrounding area required to be assessed.

The conclusions drawn are that from an integrated development approach to the redevelopment of this former industrial precinct the scenario of development consistent with the McGill Street Precinct Master Plan and this Concept Plan achieves superior relationships with the surrounding area and for the integration of public domain improvements with the new light rail transport infrastructure.

5.2.5 Height and Envelope Studies

The Concept Plan Report prepared by Hassell (Attachment 1) includes detailed urban design analysis of the rationale behind the proposed heights and building volumes.

As demonstrated, the proposed building envelopes have been guided by the approach to retain and re-use the significant buildings on-site and to reflect the volumes of the structures to be demolished. The new buildings have been configured to provide a low rise presentation to Edward Street and to relate to the building envelopes proposed within the McGill Street Precinct Master Plan.

The Concept Plan proposes to locate higher buildings away from the current low rise residential area in Edward Street and provide greater building heights central to the site. The higher building envelopes are oriented to provide maximum solar access into the proposed publicly accessible areas of the site.

As noted in the Concept Plan Report, the tallest building on-site remains the silos and the Concept Plan seeks to retain the existing height of these structures.



5.2.6 Siting, Orientation Massing and Articulation

The Concept Plan Report prepared by Hassell (Attachment 1) includes the urban analysis upon which the proposed building envelopes are based.

The analysis has had regard for a series of site considerations which have lead to the formulation of site development principles. The development principles that have been adopted for the site include embracing the existing heritage structures, maintaining the existing silos as the dominant and tallest structure on the site, providing greater visibility to the proposed Greenway and light rail corridor, providing publicly accessible open space areas framed by active land uses, establishing linkages and connections to new and proposed pedestrian and cycleway facilities and providing solar penetration into the proposed open space areas and future residential buildings. These development principles have guided the formulation and configuration of the proposed building envelopes.

The Concept Plan has resulted in a proposal that:

- links with the existing centres of Summer Hill and Lewisham;
- provides clear pedestrian linkages informed by the provision of publicly accessible open space areas;
- re-use of heritage significant buildings and features;
- identification of active frontages to public domain areas;
- provision of a range of building heights to respond to and reflect the scale of adjacent existing and proposed development;
- provision of multiple entries into the site for vehicles and pedestrians;
- recognition of the accessibility to existing and proposed public transport infrastructure; and
- protection of proposed internal and public area amenity with regard to access to light and ventilation.

The positive outcomes of activating access through the site to the proposed light rail stop and beyond to the adjoining McGill Street Precinct supports the building envelopes as proposed in the Concept Plan.

5.2.7 Visual and View Analysis

The Concept Plan Report prepared by Hassell (Attachment 1) includes a visual analysis comparing the current urban form with the proposed urban form based upon the Concept Plan building volumes.

The analysis has included comparisons between existing and proposed views. The consideration supports the approach of maintaining the heights of the existing structures to be retained or replaced. The new buildings within Stage 4 are located well away from existing residential properties and are located on the site in a manner that avoids the creation of adverse amenity impacts in regards to loss of solar access, privacy or scale in relation to existing development. The distribution of building heights respects the lower scale of buildings along Edward Street and provides a transition up to the taller structures located centrally on the site. The proposed distribution of building volumes on the site is appropriate and will not detrimentally impact upon the character of the locality.

As required by the DGRs the Concept Plan Report prepared by Hassell (Attachment 1) has included a comparison between this Concept Plan and the proposed development of 78-90 Old Canterbury Road (MP08_0195). This comparison has had particular regard to the views towards the site and the proposed Lewisham West light rail stop from the McGill Street Precinct to the east. The analysis clearly demonstrates the positive outcome of the proposed development in



conjunction with the McGill Street Precinct Master Plan compared to the less desirable outcomes that arise from the Concept Plan currently under consideration for 78-90 Old Canterbury Road, Lewisham.

5.2.8 Linkages to Light Rail and Greenway

The Concept Plan has been prepared from its inception as a development that would suit transit oriented development principles to take advantage of the then proposed light rail extension.

The design team at Hassell have held several meetings with representatives from the Transport Construction Authority (TCA). These discussions have focussed upon the proposed layout for the Concept Plan and the relationship with the proposed light rail and input to the exhibition period on the future location of the Lewisham West light rail stop.

These discussions have resulted in the Lewisham West light rail stop being relocated to the junction of the existing rail alignment and the east west pedestrian connection between the McGill Street Precinct Master Plan and this Concept Plan.

The alignment of the pedestrian space and active street frontages has been configured to provide a safe, interesting and logical linkage to the light rail and the associated cycle and pedestrian pathway along the Greenway.

The proposed buildings provide active frontages and address the light rail alignment to maximise the sense of integration and interaction between this mixed use development and the light rail. This approach will ensure that the development of the Summer Hill Flour Mill site in conjunction with the McGill Street Precinct Master Plan will result in a revived precinct where all development addresses the public domain areas and the Greenway.

A formal meeting was held with representatives of Transport NSW on 3 March 2011 to present the Concept Plan and to seek in principle support for the proposal and the manner in which the light rail stop has been treated as a focus of the pedestrian access ways and the relationship between the Greenway and the proposed buildings. The discussion and feedback at the meeting was positive and formal confirmation of the Transport NSW's support of the matters discussed is pending.

An assessment of the Concept Plan has been undertaken against the Greenway Design Principles which is detailed in Table 6 below.

| Issue | Response | Consistency |
|------------------------------|---|-------------|
| Addressing the Greenway | The proposed development fronts the Greenway to take advantage of the easterly aspect as well as to take advantage of the positive attributes of the Greenway. The buildings provide connections to the Greenway and casual surveillance. | Yes |
| Contribution to the Greenway | The proposal contributes to the Greenway by providing significant publicly accessible pathways and open space linking to the Greenway. These accesses will support the usability and access to the Greenway and light Rail stop. | Yes |



| Issue | Response | Consistency |
|---|--|-------------|
| Avoid the creation of a Greenway tunnel | The Concept Plan adopts a sensitive approach to built form and embraces the existing heritage structures on the Summer Hill Flour Mill site. The design ensures greater visibility of the Greenway corridor. New streets are oriented toward the light rail line, formalising the Greenway corridor into a pedestrian/cyclist/light rail compatible boulevard. Active uses such as cafes, studios and small retail spaces line the streets fronting onto open spaces increasing activity and pedestrian traffic along with safety and security for users of these spaces. A “tunnel” will not be created by the proposed development. | Yes |
| Spaces Adjoining the Greenway | The proposal includes open spaces linking to the Greenway that will assist in making the facility a community asset. The proposed development will facilitate greater access to and use of the Greenway by the public by providing easier at grade opportunities to access the Greenway. | Yes |
| General Access | Fencing treatments and access to the Greenway will be finally resolved in connection with Transport NSW in subsequent applications. | Yes |
| Pedestrian and cycle access | The development provides multiple pedestrian and cycle access points to the Greenway and the light rail stop. The access is barrier free and will be accessible 24 hours a day, be well lit and will be attractive spaces in an open space configuration framed by active land uses. | Yes |
| Overshadowing | The configuration of the proposed buildings minimises overshadowing to the Greenway. | Yes |
| View Corridors | The configuration of a broad landscaped pedestrian link provides a visual and physical connection to the Greenway and the light rail stop and allows for views to and across the Greenway. This outcome emphasises the perception that these are a connected sequence of open and publicly accessible green spaces. This link has been configured to act as a natural extension to the proposed open space spine through the McGill Street Precinct. | Yes |
| Overlooking | The location and configuration of residential, retail, and commercial uses provides casual surveillance to the Greenway, the internal pedestrian linkages and to the light rail stop. | Yes |
| Impact of Light Rail | Noise and vibration impacts from the light rail have been considered and included in the Statement of Commitments. | Yes |



| Issue | Response | Consistency |
|---|---|-------------|
| Height, Scale and Bulk | The buildings adjacent to the Greenway are being retained and reused. The new building to the north of the site is setback from the Greenway. The height and scale of buildings responds to the context of the buildings existing on-site and the masterplan for the McGill Street Precinct. The proposed building forms steps down to a low rise integration with existing development opposite the site in Edward Street. | Yes |
| Visual Form | The re-use of the existing buildings reflects the heritage of the site. The palette of the materials and finishes is yet to be finally resolved. | Yes |
| Materials in Spaces Adjoining the Greenway | Fencing/ barriers and public domain furniture is yet to be finally resolved. These matters can be readily resolved in future applications. | Yes |
| Sustainability | The proposal seeks to re-use significant existing buildings and is supported by an ESD report detailing a range of initiatives that can be incorporated into the development in future applications. | Yes |
| Water Sensitive Urban Design (WSUD) | The application is supported by a stormwater assessment based upon and incorporating WSUD principles. | Yes |
| Biodiversity | The flora and fauna assessment recommends the use of species that could provide habitat and food source for the Long Nosed Bandicoot. | Yes |
| Accommodation of Flora Needs | New landscape planting can complement the desired landscape species for the Greenway. | Yes |
| Accommodation of Fauna Needs | The flora and fauna assessment recommends the use of species that could provide habitat and food source for the Long Nosed Bandicoot. | Yes |
| Way finding | Way finding can be provided and detailed in subsequent applications. | Yes |
| Community and Cultural | The proposal includes large areas of open space and communal areas suitable for community activities such as weekend markets, public art and community events. | Yes |
| Community Involvement | The site has been designed to provide access to and through the site to the broader community. The proposed open spaces and buildings will provide recreation, retail and work opportunities as well as housing opportunities. | Yes |



| Issue | Response | Consistency |
|----------|---|-------------|
| Heritage | The proposed is supported by a detailed assessment and consideration that respects the site past use and integrates significant elements into the proposed development. | Yes |

Table 6 Assessment against the Greenway Design Principles

5.2.9 Aircraft Related Height Restrictions

As identified at section 5.1.17 of this EA the proposed buildings retain the current maximum height and do not seek to or propose to breach the height restriction of RL 58m AHD requested by the Sydney Airport Corporation (SAC). The tallest structures on the site are the bank of four concrete silos. The current maximum height of these silos is RL 57.6m AHD and this maximum height, below the SAC height limit is to be retained.

5.2.10 Design Quality and Safety by Design

The Concept Plan is supported by a SEPP 65 Design Verification Statement and assessment of the ten Design Principles from SEPP 65 prepared by the project architect. The statement confirms that the proposed building forms are readily capable of achieving and exceeding the amenity and built form design outcomes of the SEPP and the associated Residential Flat Building Design Code (RFDC). The RFDC assessment at table 5 has confirmed that the proposed building separations and treatments meet or exceed the guidelines to ensure that visual privacy between future dwellings is achieved. Compliance with these guidelines will be required to be demonstrated in subsequent Project Application or Development Applications for the individual stages of the proposed development.

The Concept Plan is consistent with and able to reinforce safety by design principles through the Concept Plan including:

- a building layout and configuration that facilitates passive surveillance;
- provision of active street front uses along the public domain circulation paths;
- the ability to incorporate appropriate lighting throughout the public domain to ensure the safety of internal and external communal areas;
- the provision of publicly accessible open space which is part of a travel path to a transport destination and which is framed by proposed active land uses; and
- secured entrances to the residential lobbies of the residential buildings.

If required subsequent Project or Development Applications could be supported by detailed Crime Prevention Through Environmental Design (CPTED) assessments. The Concept Plan however establishes a framework and site layout for future development that can readily accord with the CPTED principles.

5.3 Land Use

The matters raised in the DGRs in relation to land use and land use allocation are addressed in the following sections and in the Concept Plan Report prepared by Hassell included at Attachment 1.

5.3.1 Land Use Mix

The mixed use redevelopment of the site proposes to include 3,500-4,000m² of commercial space and 2,500- 2,800m² of retail space in addition to 280-300 residential dwellings.



As detailed in sections 3.2 and 3.3 the proposal is consistent with the applicable draft subregional strategies through the contribution to the residential dwelling targets and employment targets, particularly for the Ashfield LGA.

The Economic Impact Assessment undertaken for the proposal by Hill PDA (Attachment 8) identifies that the development could generate 85 to 95 full time and part time retail jobs and generate 115 to 135 office jobs. This contrasts to the 49 mill staff and 75 office staff previously employed on the site when the mill was operational.

The Hill PDA assessment has also concluded that the proposed provision of small scale retail space will support uses that service the residential and employee population of the site and the future pedestrians and commuters who will traverse the site. The scale of retail space proposed will therefore be complimentary offerings to the retail services in the locality that will not unacceptably impact upon the viability of surrounding existing centres, particularly Summer Hill.

This potential creation of 200 to 230 jobs identified in the Hill PDA assessment is a significant contribution to the target of 500 new jobs for the Ashfield LGA under the Draft Subregional Strategy. Similarly the delivery of 280-300 dwellings represents a significant contribution to the target of 2000 additional dwellings for Ashfield.

5.3.2 Affordable Housing

The Concept Plan has not sought to specifically identify the provision of affordable housing within the development. The opportunity to provide affordable housing remains through the consideration of future VPAs for the site and through subsequent Project Plan applications or Development Applications for the individual stages of the development.

5.4 Public Domain/Open Space

The matters raised in the DGRs to be addressed in the EA in relation to the public domain and open space are addressed in the following sections and in the Concept Plan Report prepared by Hassell included at Attachment 1.

5.4.1 Landscaped Open Space Areas

The Concept Plan proposes extensive areas of open space that provide pedestrian linkages and recreation opportunities.

The Concept Plan proposes three types of landscaped open space:

- green publicly accessible landscaped open space;
- urban publicly accessible landscaped open space; and
- landscaped private open space.

The publicly accessible open spaces provide and facilitate pedestrian accessibility through the site and provide circulation among the proposed buildings as well as recreation opportunities adjacent to the future ground floor retail and commercial spaces.

The open spaces are framed by active uses to provide dual use opportunities as well as affording casual surveillance outcomes. The access and traffic circulation is detailed within the Concept Plan Report prepared by Hassell (Attachment 1).

The third form of open space provided within the development is in the form of private open space to service the residential development on the site. These internal communal courtyards are



proposed for the low rise residential buildings that front onto Edward Street. These areas are proposed to be accessible for the future residents of these residential buildings.

5.4.2 Pedestrian/Cycle Connectivity

The Concept Plan provides linkages to and addresses the light rail corridor and the Greenway. The Concept Plan supports this public infrastructure through the provision of publicly accessible pedestrian routes providing access to this proposed infrastructure that would not be afforded if light industrial uses were to remain on the site. The accessibility into and through the site has been designed to integrate and mesh with the McGill Street Precinct Master Plan, providing at grade accessible paths of travel through the site and linking Summer Hill with Lewisham. The location of the access through the site focuses upon the proposed the Lewisham West light rail stop as clearly documented in the Hassell Concept Plan Report.

The evolution of the design, informed by the light rail proposal, has ensured that the new light rail stop will be integrated visually and practically with this proposed development and will meaningfully support and facilitate the use and patronage of this new public transport infrastructure.

The relationship of this Concept Plan with the Concept Plan MP08_0195 has also been addressed in the application documentation. The connectivity between the Summer Hill Flour Mill site and McGill Street remains, however the quality of the urban space and the way finding to the light rail is diminished by the proposal covered by Concept Plan MP08_0195.

5.4.3 Public Area Dedication

It is intended at this stage that the new streets with access off Edward Street will be dedicated as public roads to Ashfield Council at a subsequent Project Application or Development Application stage. These roads are of a width and design that match with Wellesley Street, which runs off Edward Street towards the west. These new streets being public roads will facilitate public access into and through the site as well as facilitate the implementation of restricted car parking zones as recommended with the TMAP assessment undertaken by ARUP (Attachment 4). Without these streets being public roads the implementation of time limited on-street car parking would be more difficult.

The new access street to Stage 4 of the Concept Plan will remain as common property. This approach has been taken due to the proposed design of this access including a bridging structure to facilitate and ensure that appropriate overland flow paths for stormwater are retained. As this proposed method of construction is not typical public road construction it is not proposed that the access would be dedicated to Council. The area would be available for public access via appropriate legal means to be established via subsequent Project or Development Applications.

A final decision has yet to be made regarding the ownership of the publicly accessible open space and pedestrian linkages. Regardless of these areas being dedicated to Council or remaining in private ownership, they have been designed to function and operate as areas of public open space and public plaza areas and pedestrian access. Public access to these areas will be afforded by appropriate legal means to be established via subsequent Project or Development Applications.

The final resolution of the ownership can be addressed with Ashfield Council at a subsequent Project Application or Development Application stage.



5.4.4 Accessibility and Safety of the Public Domain

The Concept Plan is considered to provide the opportunity for a safe and accessible public domain. The proposed Concept Plan provides:

- a building layout and configuration that facilitates passive surveillance of private and public domain areas;
- provision of active street front uses along the public domain circulation paths which further augments the passive surveillance of public domain areas;
- appropriate lighting can be provided throughout the public domain areas to ensure the safety of external communal areas;
- the layout supports achieving compliance with Crime Prevention Through Environmental Design (CPTED) principles for all elements of the proposal;
- access for people with disabilities is afforded by the provision of at grade accessible paths of travel throughout the public domain areas and connecting to the proposed light rail stop and the public areas of the proposed buildings;
- the new street layouts have been provided to provide access into the site without creating “short cuts”;
- the new street environment will foster low speed vehicle movements; and
- pedestrian accessibility throughout the site will be possible with minimal need to cross vehicle travel routes.

5.5 Environmental and Amenity Impacts

The matters raised in the DGRs in relation to environmental and amenity impacts are addressed in the following sections and within the Concept Plan Report prepared by Hassell at Attachment 1.

5.5.1 Solar Access and Amenity

The Concept Plan is supported by a detailed solar access and shadow analysis prepared by Hassell and included within the Concept Plan Report (Attachment 1). The analysis demonstrates that the proposed residential buildings can achieve access to the levels of solar access deemed appropriate by the Residential Flat Design Code (RFDC) and that the public domain areas will be afforded high levels of solar amenity. The solar access analysis has been developed having regard to the built form contemplated under the McGill Street Precinct Master Plan.

The Concept Plan is also supported by a SEPP 65 Design Verification Statement from the project architect and an assessment against the ten Design Principles of SEPP 65. The statement confirms that the proposed buildings are readily capable of achieving and exceeding the amenity and built form design and amenity outcomes of the SEPP and the associated RFDC.

5.5.2 Acoustic Impacts

The proposal is supported by a detailed noise and vibration assessment prepared by Atkins Acoustics that has addressed the impacts on residential amenity arising from noise and vibration from road, rail, light rail and aircraft sources as well as the operation of the non-residential uses in the proposed development (Attachment 9).

The assessment found that if appropriate measures and treatments to buildings are not undertaken that the acoustic and vibration amenity of the proposed dwellings may not be optimal or comply with the standards and guidelines.



The assessment has concluded that with standard building construction approaches and management, the acoustic and vibration amenity for the proposed dwellings can satisfy the relevant standards and guidelines.

The range of measures and considerations recommended to ensure that an acceptable acoustic and vibration amenity is achieved for the proposed residential accommodation includes:

- upgrading of glazing to building facades;
- consideration of composite facades comprising masonry walls and glazed windows and doors;
- use of enclosed louvered balconies/terraces/loggias to residential living rooms and bedrooms where greater acoustic performance is required
- use of mechanical ventilation methods where façade treatments cannot achieve acoustic performance in isolation.

The assessment also acknowledges that in the detailed design for future Project or Development Applications a range of options will be available to the building designers to achieve the provision of a suitable amenity.

The Draft Statement of Commitments includes reference to the acoustic and vibration assessment and an undertaking to ensure these considerations and guidelines are taken into account in future Project or Development Applications for the site.

5.6 Transport and Accessibility

The matters raised in the DGRs in relation to transport and accessibility are addressed in the following sections and in the Traffic Management and Accessibility Plan (TMAP) prepared by ARUP (Attachment 4). The TMAP has been prepared to address all of the requirements of the DGRs.

The TMAP assessment found no traffic constraint to the proposed development. The key findings of the study were:

- *The proposed Summer Hill Flour Mill site involves medium density residential development, complemented by ancillary retail and commercial land uses.*
- *On-site observations of traffic conditions at key intersections surrounding the precinct indicate traffic flows satisfactorily, with all vehicles clearing signalised intersections in a single signal cycle, despite long queues forming in peak periods on Railway Terrace.*
- *The site is well connected to existing State Transit bus routes, with a number of public bus routes operating near the Summer Hill Flour Mill site.*
- *The site is well located for heavy rail use, with both Summer Hill and Lewisham stations located approximately 500m from the site offering direct access to the Sydney CBD.*
- *A planned 5.6km extension of the light rail service includes a station at Lewisham adjacent to the sites with connections to the existing heavy rail station. Provision of this infrastructure upgrade will increase public transport availability for future residents in the Summer Hill Flour Mill site.*
- *Local footpaths and the Greenway provide walking access to key destinations surrounding the site, with the site well served by a number of local and regional cycling routes.*
- *The Summer Hill Flour Mill development proposes to provide a total of 450-550 underground parking spaces, which would be allocated to residents and other regular users of the site. An additional 50 to 70 on-street parking spaces are to be provided within the site. These would be allocated to visitors and other short-stay users. All on-street parking will need to be time restricted with an appropriate allocation of Loading Zones. This complies with the parking provision outlined in the Ashfield Council DCP ensuring adequate on-site provision to prevent overspill onto surrounding streets.*



- *The Summer Hill Flour Mill development is forecast to generate approximately 289 vehicle movements in the peak hour. The majority of these trips are forecast to originate from the western end of the site where traffic volumes are relatively low.*
- *The site is currently underutilised. If the site remained fully operational for mixed industrial uses, it could be expected that traffic generation would be higher than the existing levels including heavy vehicle movements. For the consolidated site area of approximately 25,000m² and applying the site FSR of 1:1 for the industrial zoning, the site could generate 1,250 vehicles/day and 250 vehicles in the evening peak hour based on the rates outlined in the RTA Guide to Traffic Generating Developments for Industry. This level of traffic generation aligns closely with that anticipated from the planned levels of mixed use development and would therefore have a similar level of traffic impact on the nearby intersections.*
- *Modelling of the local road network has found that eleven of the thirteen key intersections surrounding the site are forecast to operate efficiently during the peak hour, following both the opening of the Summer Hill Flour Mill and the adjacent McGill Street developments.*
- *The Railway Tce/Old Canterbury Rd intersection currently experiences high levels of queuing, with signal phasing adjusted to allow vehicles to pass through the intersection in a single cycle. Construction of the proposed mixed use developments are forecast to increase delays at the intersection, however not to an unreasonable level where it will adversely impact on surrounding intersections.*
- *With increasing delays to traffic on the sub arterial roads, it could be expected that some through traffic may redistribute to alternative main road routes. There are no opportunities for traffic to divert to local streets to undertake these through trips due to the physical restrictions in the area primarily caused by the railway corridor and discontinuous local road system.*
- *The traffic generation used in this analysis has not considered the introduction of the light rail extension to Dulwich Hill, and thus is considered a conservative analysis. Provision of the upgrade will increase the non-car mode share to and from the site, resulting in a reduced impact on the local road network.*
- *Implementation of sustainable travel initiatives such as the provision of car share on the site, public transport accessibility and good bicycle parking provisions will further reduce the reliance on private vehicle.*

The assessment has concluded that on the basis of these findings the proposed development is acceptable subject to the implementation of the measures identified in the TMAP. These include the implementation of physical traffic management measures including:

- traffic signals at the intersection of Edward and Old Canterbury Road;
- new roundabout at Edward and Smith Streets;
- provision of a raised central median in Smith Street;
- left in left out turn restrictions to the new Smith Street and Old Canterbury Road access points.



Further initiatives include:

- the provision of on-site bicycle storage facilities;
- consideration of the allocation of car share car parking spaces; and
- restricted parking in the on street car parking spaces.

The undertaking to implement the TMAP requirements is included within the Draft Statement of Commitments prepared in support of the Concept Plan.

The TMAP assessment has also considered the implementation of an eastbound kerbside bus lane on Old Canterbury Road. The implementation of such a lane has not been recommended due to the adverse effect on the performance of the major intersections in the locality.

A further requirement of the TMAP assessment was the consideration of the cumulative traffic impacts of the Summer Hill Flour Mill site development in conjunction with the Concept Plan for 78-90 Old Canterbury Road, Lewisham (MP08_0195) and the McGill Street Precinct Master Plan.

The TMAP assessment considered scenarios of the development of the Summer Hill Flour Mill site in conjunction with the development potential of the McGill Street Precinct and if the precinct was development in accordance with Concept Plan for 78-90 Old Canterbury Road, Lewisham (MP08_0195). The assessment has found that the overall redevelopment of the precinct consistent with this Concept Plan and the adopted McGill Street Precinct Master Plan achieve and over all higher level of intersection performance than if this Concept Plan were to be developed in conjunction with the Concept Plan for 78-90 Old Canterbury Road, Lewisham (MP08_0195). Specifically the assessment found that:

- *Overall, the traffic impact due to the proposed 78-90 Old Canterbury Road developments (within the McGill Street development) will be significant at some intersections in the vicinity of the site. Some of the intersections are already over capacity (e.g. Parramatta Road/ West Street, Railway Terrace/West Street) and 78-90 Old Canterbury Road traffic will further deteriorate the intersection performance.*
- *A number of traffic issues considered in the Traffix report (for MP08_0195) needs to be clarified as stated in section 6.5 of this report before determining the full traffic impact of the 78 – 90 Old Canterbury Road development in the locality.*

5.7 Economic Impact Assessment

The matters required by the DGRs to be addressed in the EA in relation to economic impacts of the proposal are addressed in the following section and the Economic Impact Assessment prepared by Hill PDA (Attachment 8).

The Economic Impact Assessment has had regard to economic impacts of the proposal, both in isolation and in relation to the range of development scenarios for the adjoining McGill Street Precinct Master Plan, the qualitative impacts of the proposal, the economic benefits and the investment stimulus of the proposal. The assessment has had regard the relevant policy framework including consideration of the Metropolitan Plan for Sydney 2036, the Metropolitan Transport Plan (2010), the Draft Inner West Subregional Strategy, the Draft South Subregional Strategy, the NSW Draft Centres Policy (2009) and Draft SEPP (Competition) (2010).

The assessment has concluded that the proposal would not have a significant impact on the viability of surrounding retail centres, particularly Summer Hill nor would the proposal be in conflict with the relevant policy framework.



The assessment has concluded that in relation to qualitative impacts:

"The provision of the proposed development in this location will help the Ashfield LGA to meet the needs of locals and consumers in terms of their shopping requirements. It will diversify the retail offer available to residents and will link to the new light railway station which will be constructed adjacent to the Flour Mill site. It will increase price competition between local retailers which will benefit consumers."

In considering the economic benefits of the proposal the assessment has determined that:

"Based on the estimated construction costs of around \$140m, there will be a further \$126m of activity in production induced effects and \$135m in consumption induced effects. Total economic activity generated by the construction of the proposed development is therefore approximately \$401m."

The proposed development will create approximately 783 job years (one full time job per year of construction). These are direct jobs, however there will also be additional jobs created through the economic multiplier effect."

The proposed development as a whole will generate around 3,216 job years."

Based on the type and quantum of floor space proposed in the development, it would generate around 200 to 230 full time and part time permanent jobs post construction."

5.8 Noise and Vibration

As detailed at section 5.5.2, the proposal is supported by a detailed noise and vibration assessment prepared by Atkins Acoustics (Attachment 9) which has addressed these issues.

5.9 Ecologically Sustainable Development (ESD)

The Concept Plan is supported by an ESD assessment prepared by ARUP (Attachment 10). The ESD assessment details that the location of the site being well serviced by a range of public transport options has the potential to support a variety of initiatives to promote ESD principles and outcomes.

The assessment has considered the configuration of the site and the ability for proposed dwellings to be provided with access to natural light and ventilation. These natural attributes can be supported by the incorporation of water management and energy consumption reduction measures for on-going stages of the development.

The ESD report has outlined the framework for the implementation of ESD measures in subsequent Project or Development Applications subject to the measures being deemed feasible. To be deemed feasible the strategy or initiative must be justified based on specific financial considerations and sound environmental benefits.

The following initiatives will be considered for subsequent Project or Development Applications regarding ESD, covering design, construction and ongoing operation of the site including:

- attenuate peak flows throughout the site by identifying and maximising available storage across the site and maximising infiltration to ground, reducing flood risks during operation;
- reuse, recycle and reduce the amount of water being utilised according to each individual building's and the site's capabilities;



- optimise the design of building's orientation to facilitate solar access and natural ventilation after construction ;
- investigate the potential for sustainable technologies such as photovoltaic energy to reduce carbon emissions in operation;
- reactivate a degraded urban area, by promoting the adaptive reuse of buildings with heritage importance and maximising the potential of existing infra-structure;
- facilitate the use of low carbon transport such as bicycle and shared or electric cars;
- reuse and recycle existing building structures and construction materials as much as possible on site, reducing waste to landfill and embodied energy;
- promote and facilitate recycling practices amongst residents and visitors as well as during construction works; and
- promote the selection of low environmental impact materials.

5.10 Heritage Considerations

The matters required by the DGRs to be addressed in the EA in relation to heritage considerations of the proposal are addressed in the following sections and in the assessments prepared by John Graham and Associates (Attachment 5).

5.10.1 Built Heritage

As required, the Concept Plan is supported by a Heritage Assessment and Statement of Heritage Impact, both prepared by John Graham and Associates. The assessment has considered the significance of the buildings and features on site that are proposed to be demolished and retained. The assessment has been prepared consistent with the guidelines published by the NSW Heritage Office. The assessment has concluded that the approach to the reuse and interpretation of the heritage significance of the site is exemplary and should be supported in retaining and supporting the ongoing use and interpretation of the heritage of the area.

The assessment also supports the proposed demolition of

- the rail sidings and encroachments into the RailCorp rail corridor;
- the ancillary building to the north of the "Mingo Scott" building;
- the administration buildings and associated car parking areas; and
- demolition of the wheat bin and its replacement with a building in the same location of similar height and scale.

5.10.2 Industrial Heritage

The site has been subject to an assessment of the heritage significance of the machinery and equipment that previously was accommodated on the site, prepared by Godden Mackay Logan Pty Ltd.

The machinery has since been sold and removed from the site, however the initial assessment found that:

"The collection of upgraded older machinery and modern equipment at Mungo Scott Flour Mills means that the mill is not a good example of any single period of technology, except the twentieth century generally, but it does not demonstrate the ongoing adaptation and modification needed to suit market conditions over eighty years."



5.10.3 Aboriginal Archaeology

The Concept Plan is supported by an Archaeological Assessment prepared by Archaeological & Heritage Management Solutions Pty Ltd (AHMS).

The assessment has identified that the majority of the site is of low Aboriginal archaeological sensitivity, while the area fronting Edward Street generally covered by the asphalt car park, and is of moderate Aboriginal archaeological sensitivity.

The report recommends subsurface investigation be undertaken prior to development occurring, which can be included as conditions of approval or as part of the Draft Statement of Commitments.

5.10.4 Historic Archaeology

The Concept Plan is supported by Historical Archaeological Assessment prepared by Archaeological & Heritage Management Solutions Pty Ltd (AHMS).

The assessment has concluded that:

- *the site of the former Allied Flour Mill witnessed a number of successive occupations from the late 18th century through to the 1960s and 70s;*
- *the site was originally part of agricultural concerns developed, from small early land grants, by significant merchants in early Sydney, such as Kable, Fouveaux and Campbell;*
- *the site was subsequently utilised by John Fyle as a brickworks, possibly as early as 1840;*
- *the site was subsequently subdivided and late 19th Century domestic houses succeeded the industrial works;*
- *the potential archaeological relics from the brickworks and the 19th Century houses have local research significance; and*
- *some of these relics have been subject to recent disturbance from development of the site.*

The report recommends that:

- *any proposed development work within the site at the former Allied Flour Mill should be assessed by an archaeologist to determine the level of impact on potential archaeological remains on the site and specifically in light of the zones of potential archaeological potential on the site;*
- *if that assessment identifies impacts on relics, as defined under the NSW Heritage Act then it will be necessary to apply for either a Section 140 Excavation Permit or an Exception under Section 139 of the NSW Heritage Act;*
- *any application should be accompanied by a Research Design and Excavation Methodology which manages any impacts on the potential archaeological resource; Any archaeological program should comply with the conditions of the issued excavation permit;*
- *the Research Design should devise a test excavation program to investigate the area of high potential on the site, impacted by the development, and an expanded archaeological program (possibly open area) should significant in situ relics be exposed by that testing;*
- *the areas of medium to low potential, subject to impact by the development, should be subject to a program of archaeological monitoring;*
- *these areas may also be subject to an expanded archaeological program should significant in situ relics be exposed by the archaeological monitoring; and*
- *the archaeological program should be undertaken as early as possible in the development timetable to avoid potential delays on critical elements of the development program.*



The Draft Statement of Commitments includes an undertaking to adhere to these recommendations.

5.11 Drainage/Stormwater Management and Flooding

The matters raised in the DGRs to be addressed in relation to stormwater and flood management are addressed in the following sections. The conclusions and recommendations of the assessment have also been included with the Draft Statement of Commitments that has been prepared for the proposal.

The proposal is supported by a Drainage/Water Management/Flooding/Utilities report prepared by APP (Attachment 6). The report has considered stormwater management, overland flows, drainage infrastructure capacity, flooding, sea level rise and Water Sensitive Urban Design (WSUD) measures.

The range of considerations are summarised in the Stormwater Concept Plan that has been prepared in support of the application. The Stormwater Concept Plan has addressed water quality measures and targets, flood management and mitigation and management of overland flow path. The considerations have concluded that the site can be suitably developed and provide for a safe environment in conjunction with management of water flows and water quality. The key findings and strategies for the site are summarised in the following sections and quote from the APP report.

5.11.1 Stormwater Concept Plan

The stormwater concept plan prepared for the proposed development plan incorporates a pipe drainage system with a 20yr ARI capacity connected to the open channel of the Hawthorne Canal on the site. Flows in excess of this capacity will be incorporated in overland flow paths safe for pedestrian access. Runoff will be treated in a series of bioretention swales, grass buffer areas, permeable paving and gross pollutant traps to reduce pollutant loads to target levels. This will be aided by roof stormwater harvesting which will reduce the volume of runoff. Stormwater detention would not be provided as the site discharges directly into the Hawthorne Canal and given the sites location at the upper end of a large catchment, the provision of onsite detention has the ability to adversely affect downstream flood levels.

5.11.2 Runoff Water Quality

The target adopted for the proposed development is that the average pollutant load would be reduced by 80% for suspended sediments, 60% for total phosphorus and 40% for total nitrogen. This approach would reduce the pollutant loads in runoff to well below the case for the existing site and therefore contribute to the long term improvement in water quality in the Hawthorne Canal.

The water quality will be achieved through the implementation of a series of bioretention swales, permeable paving surface areas, rainwater harvesting tanks, gross pollutant traps and grass buffer areas.

5.11.3 Runoff Peak Flows

The subject site drains directly into the Hawthorne Canal and does not rely upon any Council drainage infrastructure. As such, no detention storage is required to cater for under capacity Council drainage infrastructure.



The target for the stormwater system is to ensure no change in the runoff peak flow rate from the site compared with existing conditions for all flood flows up to the 100yr ARI event. This will ensure no adverse impacts on flood levels for adjacent sites.

The provision of detention storage to slowdown flows on the site would potentially increase the peak flow from the large upstream catchment in Hawthorne Canal.

The flow modelling included with the report prepared by APP at Attachment 6 demonstrates that detention storage is not required on the site in order to maintain existing peak flow rates.

5.11.4 Flooding

The applicable 100yr ARI flood level for the subject site has been determined to facilitate the identification of appropriate floor levels for residential dwellings and freeboards for basement entries above the 100yr ARI flood level. The assessment has concluded that the floor and basement entry levels proposed are acceptable satisfactorily address potential flood risk.

The assessment of flood behaviour on the site has concluded that the proposed development would not change the existing flood behaviour and would maintain the existing peak flood flow rates so that there would be no change in flood levels compared with existing conditions.

All the proposed residential buildings have appropriate freeboards to habitable floor levels and to basement driveway entry crest levels to provide acceptable levels of risk for flood damage and personal safety.

5.11.5 Emergency Flood Response Plan

The assessment of flood impacts on the proposed development has included the formulation of an emergency flood response plan to cater for the flood risk for floods between the 100yr ARI and PMF floods. While the 100yr ARI flood is the adopted flood standard for establishing floor levels, an emergency flood response plan is required to appropriately manage the risk to personal safety during more severe floods up to the PMF event.

The proposed emergency flood response plan for the development consists of:

- vertical evacuation to higher floor levels above the flood levels to make the plan self sufficient;
- an alarm sounds when floodwaters on the site reach RL 10.8m AHD requiring residents and workers to move to higher floors above the PMF level;
- requirement for each body corporate to be responsible for the plan including nomination of people to be wardens in the building, training of all residents/workers and instigating annual drills to practice the plan requirements;
- provision of signs and lighting to inform people of the evacuation route; and
- access for emergency services if required during a flood.

All residential buildings have floor levels above the PMF level so vertical evacuation provides flood free refuge for all floods. The floor levels of the heritage buildings to be retained include floor levels below the PMF but all have access to refuges and emergency egress that will be above the PMF levels.

5.11.6 Hawthorne Canal Rehabilitation

In response to the DGRs, a request was made to meet with the NSW Office of Water (NOW). The request to meet was declined and in response a written request for feedback and clarification was provided. A response to this letter was received on 17 March 2011 (Attachment 18) and has confirmed that many of the concerns raised in NOW's response to the DGRs are matter that



should be addressed at Project Application stage. The response has requested further clarification of the impacts of the proposed treatment of the Hawthorne Canal in relation to the proposed Greenway.

The main issue to be considered relates to the comments from NOW seeking the establishment of riparian corridors to the Hawthorne Canal. The canal in the vicinity of the subject site is predominantly "capped" and built over by the former goods rail line that is being converted to the light rail use. There is minimal opportunity to implement riparian corridors in this configuration.

The light rail corridor seeks to implement objectives and treatments consistent with the "Greenway" vision. The establishment of vegetation treatments along this alignment as intended by the Greenway and as embraced by the Inner West light rail extension are considered the most appropriate outcomes in this regard. That is the Greenway follows the alignment of the rail corridor in this vicinity, not this isolated section of the Hawthorne Canal.

As detailed in the Drainage/Water Management/Flooding/Utilities report prepared by APP (Attachment 6), further complications are presented for the small section of the canal that traverses the subject site that is not capped. The canal is in the ownership of Sydney Water and is a heritage item. In addition the canal performs an important flood water flood discharge function. In the current state the canal allows the transmission of flood waters at a rate that helps avoid the system in the upper catchment from backing up. A significant alteration to the landscape treatment of this small section of the canal has marginal habitat values but potentially significant adverse impacts upon the capacity of the canal to convey flood flows.

It is also noted that the western side of the small section of the open canal channel is not part of the development proposal and the landscape treatment of this area between the canal and Smith Street will remain unchanged.

The interface with the canal in Stage 4 can and will be landscaped, but with a focus upon ensuring flood event flows being conveyed safely, rather than as an isolated pocket of riparian vegetation of marginal value.

5.12 Groundwater Management

A Geotechnical Investigation Report has been prepared by Aargus in support of the Concept Plan (Attachment 7). The investigations included the sinking of six boreholes on the site. In only one borehole (BH 6) was water seepage encountered. The seepage was encountered at a depth of 3.9m below ground surface level.

The geotechnical report has identified that no basement excavation is proposed in the vicinity of this borehole and that the unconfined aquifer is below any proposed basement parking excavation. The investigation has confirmed that no groundwater pump is required and no use of groundwater resources is proposed as a result of this proposed development.

5.13 Rail Impacts

Consultation with Transport NSW (which now includes RailCorp and the Transport Construction Authority) was held on 3 March 2011. The consultation addressed the consistency of the proposed Concept Plan and the opportunities that arise relative to the approval of the Inner West light rail extension, the provision of an emergency flood evacuation access over RailCorp land to Longport Street and the need to address detailed geotechnical construction considerations at the Concept Plan stage.



Arising from the consultation in principle support was sought relating to:

1. The proposed Concept Plan for the site and the relationship of the development to the light rail and Greenway;
2. Provision of a pedestrian access over Railcorp land to the Longport Street bridge from the proposed residential buildings within the north-east corner of the site for flood evacuation purposes; and
3. That geotechnical and construction issues and impacts upon the light rail corridor in accordance with Railcorp's "Standard Brief", be more appropriately addressed in detail with subsequent Project Plan or Development Applications.

Formal confirmation of the understanding of the outcomes of the meeting is pending issue from Transport NSW at the time of finalisation of this report.

5.14 Contamination

As detailed at Section 5.1.9 of this report, a Detailed Environmental Site Assessment prepared by Aargus (Attachment 13) has been undertaken of the site which has identified that the site can be made suitable for mixed use development.

5.15 Flora and Fauna

The matters required by the DGRs to be addressed in the EA in relation to flora and fauna are addressed in the following sections and in the assessments prepared by Travers Environmental at Attachment 11 and 12).

5.15.1 Flora and Fauna Assessment

A Flora and Fauna Assessment and a Target Long Nosed Bandicoot Survey were undertaken for the project by Travers Environmental (Attachments 11 and 12). The Flora and Fauna assessments found that:

"In respect of matters required to be considered under the Environmental Planning & Assessment Act (1979) and relating to the species / provisions of the Threatened Species Conservation Act (1995);

- *no threatened fauna species were recorded within the subject site;*
- *no threatened flora species were recorded within the subject site; and*
- *no endangered ecological communities were recorded within or in close proximity to the subject site.*

The 7 part test of significance (Section 5) has concluded that the proposed development will not have a significant impact on any threatened species, populations or endangered ecological communities. Therefore, a Species Impact Statement should not be required for the proposed development.

In respect of matters required to be considered under the Environment Protection and Biodiversity Conservation Act (1999);

- *no threatened fauna species were recorded within the subject site;*
- *no threatened flora species were recorded within the subject site; and*
- *no endangered populations or endangered ecological communities listed under this Act were recorded within or in close proximity the subject site.*



In respect of matters relative to the Fisheries Management Act 1994, no suitable habitat for marine/aquatic species was observed within the subject site and as such there are no matters requiring further consideration under this Act."

The Flora and Fauna assessment has recommendations include:

- *it is recommended that mature Fig trees are retained within the landscape plan to provide an ongoing foraging resource for birds, arboreal mammals and megachiropteran bats such as the threatened Grey-headed Flying-fox (*Pteropus poliocephalus*). Brush Box (*Lophostemon confertus*) is not an endemic native to the area, however retention of mature specimens, where possible, would provide an additional ongoing foraging resource for these species.*
- *the landscaping within the subject site could provide areas of vegetation that could contribute to foraging areas suitable for the Long-nosed Bandicoot. The proposed fencing should, where possible, allow for movement and access to the site for this species.*
- *it is recommended that any landscaping used on site should consider utilising locally occurring native species to support foraging habitat for local native fauna, particularly birds.*

The Draft Statement of Commitments includes an undertaking to implement the recommendations of this assessment.

5.15.2 Long Nose Bandicoot

In addition to the Flora and Fauna assessment, a Target Long Nose Bandicoot Survey of the site was undertaken.

The Target Long Nose Bandicoot Survey concluded that:

The 7-part test assessment within the Flora and Fauna Assessment Report concluded that the proposal is not likely to have an adverse effect on the life cycle of the Long-nosed Bandicoot that constitute the endangered population in Inner-Western Sydney such that a viable local population of this species is likely to be placed at risk of extinction.

Given the close proximity of the site to recorded locations of Long-nosed Bandicoot, the landscape design should consider the provision of native landscape beds that can contribute to foraging areas suitable for this species. The proposed fencing should, where possible, allow for movement and access to the site for this species."

The inclusion of landscape treatments to contribute to foraging areas and controls on the provision of appropriate fencing can be included in the Statement of Commitments.

It is noted that fencing treatments will also have to accord with future requirements of transport NSW in relation to the interface of the site with the Greenway and the light rail corridor.

5.15.3 Vegetation Retention

The existing trees identified to be retained in the Concept Plan are all well clear of any proposed building envelope or basement area. The vegetation to be retained is primarily within the proposed landscaped open space off Smith Street and along the Smith Street frontage of the site. This vegetation is well clear of the proposed building envelopes which do not encroach into the zone of influence of these trees to be retained. Retention of this vegetation will not be hindered in future Project or Development Applications for the proposed stages of the development.



5.15.4 Commonwealth Environment Protection and Biodiversity Conservation Act 1999

As required by the DGRs the proposal was referred to the Department of Sustainability Environment Populations & Community (EPBC referral 2011/5859). In response to the referral the Department advised that the conclusions of the Travers Environmental Flora and Fauna assessment were concurred with and that the chance of any matters of national environmental significance being affected by the development was very low.

As a result there was no need for a formal referral under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the formal referral was withdrawn.

5.16 Contributions

The matters raised in the DGRs in relation to development contributions are addressed in the following section.

Ashfield and Marrickville Councils have Section 94 Contributions Plans that apply to the land covered by the Concept Plan.

The rates for the two Council's are summarised in Tables 7 and 8 below:

| Development Type | Method of Levy | Contribution Rate |
|---|------------------------|-------------------|
| Residential Accommodation less than 60m ² GFA | Per dwelling | \$8,898.90 |
| Residential Accommodation between 60-84m ² GFA | Per dwelling | \$13,649.42 |
| Residential Accommodation greater than 84m ² | Per dwelling | \$19,440.76 |
| Retail Shops | Per m ² GFA | \$177.86 |
| Commercial | Per m ² GFA | \$272.14 |

Table 7: Summary Ashfield Council S94 contributions.

| Development Type | Method of levy | Contribution rate |
|-----------------------------|----------------|-------------------|
| Residential small dwelling | Per dwelling | \$7525 |
| Residential medium dwelling | Per dwelling | \$10660 |
| Residential large dwelling | Per dwelling | \$14235 |

Table 8: Summary Marrickville Council S94 contributions.

Contributions based upon these rates will be paid on subsequent Project Plan or Development Applications, and this undertaking is confirmed in the Draft Statement of Commitments.

5.17 Consultation

The matters required by the DGRs to be addressed in the EA in relation to consultation are addressed below, detailing agency consultation and proposed community consultation and engagement.



Agency consultation was undertaken in the preparation and finalisation of this Concept Plan. Direct consultation and discussions were held with Transport NSW to consider the matters relevant to the integration of the proposal with the recently approved light rail extension, the Lewisham West stop and the Greenway. Confirmation of the understanding and in principle support of the proposed Concept Plan arising from these discussions is pending from Transport NSW.

A response from NOW to a number of issues raised arising from the DGRs was received on 17 March 2011 and the EA has provided the appropriate response to the matters detailed. The NOW response confirmed that many of the matters raised in the DGRs would be addressed, if necessary at subsequent Project or Development Application stage.

As detailed in the TMAP at Attachment 4, comment and feedback on the transport related matters was also sought and received from:

- Ashfield Council;
- GreenWay Group;
- Marrickville Council;
- NSW Transport;
- RTA;
- RailCorp; and
- NSW State Transit.

Consultation has also occurred with the utility authorities regarding the ability to service the site as addressed at section 5.18 of this report.

In relation to community consultation the proponent is committed to continued engagement with the local community. Previously the proposed mixed use redevelopment of the site has been subject to extensive preliminary consultation and community attitude surveys. While these surveys were based on a previous Planning Proposal lodged with Ashfield and Marrickville Councils, the Concept Plan is substantially the same and the findings and proposed actions remain relevant. The report on these considerations prepared by Urban Concepts is included at Attachment 17.

The consultation to date has included direct survey effort, establishment of a website, distribution of a newsletter and a presentation to Council and the community on the proposed development.

In conjunction with the public exhibition period of the application to be undertaken by the Department the proponent is committed to expand upon the previous consultation undertaken in regards to the proposed redevelopment of the site.

The proposed consultation approach to this phase of the development seeks to:

- encourage activation of the site to enable interested residents and stakeholders to understand 'on the ground' the built and landscape form that the development would take under the Concept Plan;
- address questions that may arise during the exhibition of the planning documents thereby giving community members sufficient time to make a submission to the NSW Department of Planning if they so decide;
- enable residents and stakeholders to meet the design team and the new owners of the site;
- facilitate a case study review of the project involving University students studying architecture and town planning; and
- demonstrate best practice in community consultation for Concept Plan and rezoning projects.



To achieve these outcomes a number actions are proposed including:

1. Reactivation of the 1800 number and project email address.
2. Project website Update to reflect the Concept Plan and the supporting documentation that will be placed on public exhibition by the NSW Department of Planning. The website will also document the planning process and include a feedback form.
3. Preparation of a community newsletter that will summarise the key aspects of the Concept Plan and the supporting documentation on public exhibition. The newsletter will also provide details of the forthcoming exhibition by the NSW Department of Planning and details about how members of the public can make a submission during the exhibition period.
4. Media Display Advertising including up to two display advertisements be placed in the local paper advising of the consultation events and inviting participation.
5. Stakeholder briefing papers would be prepared for provision to stakeholder groups.

In addition to these actions a range of consultation events are proposed including:

1. Site Open Day incorporating guided site walks with the design team be employed to explain the Concept Plan.
2. Stakeholder information and briefing sessions would be held with Councillors and specialist interest groups, most likely also held on site and would incorporate a site tour. We have allowed for two stakeholder briefing sessions.
3. In addition to the site tours, an information evening would be held mid way through the exhibition period. The information evening would enable the specialist team to walk participants through the documents that are on exhibition and to answer any specific questions that arise.
4. The Summer Hill Flour Mill site is a unique inner city land holding which is being developed for one of Sydney's first transit orientated developments. The nature of the project, the planning process and the transport and land use mix make this project an excellent case study for tertiary students studying in the areas of architecture and town planning. Accordingly, there is a unique opportunity for the proponent to work with the key Universities and local academics to case study this project.

5.18 Utilities

The Concept Plan is supported by a Drainage/Water Management/Flooding/Utilities report prepared by APP (Attachment 6). The report has confirmed that all necessary utility infrastructure is available to the site and that capacity is available to service the subject development and development within the adjoining McGill Street Precinct. The Draft Statement of Commitments also undertakes to complete in conjunction with the relevant authority any required augmentation of the utilities to service the development.

5.18.1 Sewerage

There are three main sewerage systems within the vicinity of the site. Sydney Water has indicated that the existing sewerage systems have capacity to accommodate the entire development proposed by this Concept Plan and the proposed development within the McGill Street precinct to the east

5.18.2 Water

The subject site has ready access to significant water supply pipelines in the streets fronting the proposed development.



Sydney Water has advised that there would be sufficient water main infrastructure in the area to adequately service this proposed Concept Plan the McGill Street Precinct Master Plan area and MP08_0195 for 78-90 Old Canterbury Road, Lewisham.

5.18.3 Power

Energy Australia has advised that there is sufficient high voltage supply to the Dulwich Hill Zone Substation to service the proposed redevelopment under this Concept Plan, the McGill Street Precinct Master Plan and the Major Project 08_0195 for 78-90 Old Canterbury Road, Lewisham.

Approximately three to four 11kVA feeders will need to be provided from this zone substation to serve the entire redeveloped precinct at the expense of the proponents of the developments.

The Flour Mill site would require approximately one or two of these 11kVA feeders to service the redevelopment proposed on this site.

Further the Draft Statement of Commitments has included the undertaking for the liaison with the utility authorities and for the augmentation of any required services to be undertaken arising from the proposed development of the site.

5.18.4 Gas

There is a primary and a local gas main in Edward Street north of Wellesley Street. In addition to these mains, there is also a secondary gas main in Edward Street south of Wellesley Street.

These significant supply mains would have significant capacity to service the proposed development. However, the servicing of the development would be a decision made by Jemena/AGL depending on their consideration of the commercial viability of this supply.

5.18.5 Telecommunications

Telecom would provide adequate services to the site to match the redevelopment rate.

5.19 Staging

The Concept Plan is proposed to be undertaken in four stages as detailed within the Concept Plan Report prepared by Hassell (Attachment 1). An extract of the staging plan is included at Section 4.6.



6.0 CONCLUSION

The Summer Hill Flour Mill site is located adjacent to a proposed new public transport facility in the form of the recently approved Inner west light rail extension and is serviced by two existing passenger rail stations. The proposed redevelopment of the site, in conjunction with the McGill Street Precinct, has the potential to deliver a vibrant mixed use transport oriented development precinct focussed upon these transport facilities. These transport facilities will be augmented by the Greenway pedestrian cycleway providing an environment that can deliver sustainable residential accommodation and employment opportunities in a highly accessible location.

The proposed outcome is consistent with the Metropolitan Plan for Sydney 2036 which seeks to support urban renewal opportunities for sites within the walking catchments of existing and proposed centres of all sizes with good public transport or in the catchment of short term potential public transport infrastructure. With access to the existing passenger rail service and the proposed light rail service the Summer Hill Flour Mill site accords with both of these guidelines.

The residential and employment opportunities that the redevelopment of the site can deliver represent significant contributions to the housing and employment targets established in the draft subregional strategies applying to the Ashfield and Marrickville Council areas.

The Concept Plan has been demonstrated to accord with the character of the local area through the re-use and adaptation of locally significant buildings and features of the site as well as opening up the site to public access.

The traffic assessment has demonstrated that the proposed development will not result in the failure of the surrounding road traffic network but will support and facilitate the viability of the proposed light rail infrastructure. The establishment of a mixed use development focussed upon the available transport facilities represents an opportunity to influence behaviour change in relation to public transport usage and a transition to a more sustainable pattern of urban living. The Concept Plan also includes the provision of appropriate traffic management measures to maximise the safety and level of performance of the transport network to the benefit of the proposed and existing residents.

The Concept Plan has demonstrated that the site layout will deliver high levels of residential and public domain amenity and that the amenity of existing and future development would not be compromised.

Overall the development is supported on the basis of the delivery of housing and employment opportunities in a manner that delivers high quality urban design outcomes and benefits, which utilises existing and proposed transport facilities and which utilises the existing utility capacity that is available to the locality.

The Concept Plan is commended to the Minister as a proposal that has addressed the Director Generals requirements and which is suitable for approval.

SJB Planning

Environmental Assessment



ATTACHMENTS



Attachment 1

Summer Hill Flour Mill Site Concept Plan Report prepared by Hassell

Please refer to bound A3 plans.

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Environmental Assessment



Attachment 2

Site Survey prepared by Watson Buchan



Attachment 3

Capital Investment Value assessment prepared by WT Partnership

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Environmental Assessment



Attachment 4

TMAP prepared by ARUP



Attachment 5

Heritage Impact Assessment and Statement of Heritage Impact prepared by John Graham and Associates



Attachment 6

Drainage/Water Management/Flooding/Utilities Report prepared by APP



Attachment 7

Geotechnical Investigation Report prepared by Aargus Australia

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Environmental Assessment



Attachment 8

Economic Impact Assessment prepared by Hill PDA



Attachment 9

Noise and Vibration Assessment prepared by Atkins Acoustics



Attachment 10

Ecologically Sustainable Development Report prepared by ARUP



Attachment 11

Flora and Fauna Assessment prepared by Travers Environmental



Attachment 12

Target Long-nosed Bandicoot Survey prepared by Travers Environmental



Attachment 13

Detailed Environmental Site Assessment prepared by Aargus Australia



Attachment 14

Aboriginal Heritage Impact Assessment prepared by AHMS



Attachment 15

Machinery and Equipment Heritage Assessment prepared by Godden Mackay Logan Heritage Consultants



Attachment 16

Historical Archaeological Assessment Report prepared by AHMS

SJB Planning

Environmental Assessment



Attachment 17

Communications Plan prepared by Urban Concepts



Attachment 18:

NSW Office of Water Letter – 21 February 2011

SJB Planning

Environmental Assessment



Attachment 19

Draft Statement of Commitments