

28 Carrington Street

SUMMER HILL 2130

26th April 2012

Director, Major Projects Assessment

Department of Planning & Infrastructure

GPO Box 39

SYDNEY NSW 2001

By email: plan_comment@planning.nsw.gov.au

Attention: Amy Watson

Dear Sir/Madam

RE: MP10_0155 Preferred Project Plan - Allied Mills Site, 2-32 Smith Street, Summer Hill

I wish to lodge my objections to the above Preferred Project Plan (PPP) and its supporting reports/documents which were apparently lodged with the Department in late March 2012 and are available for viewing on your website.

You will note from my August 2011 letter of objection to the Concept Plan that I have lived in the vicinity of this site for over 25 years and that I have qualifications in the built environment

While I am pleased that some of the matters I and other residents raised when the concept plan was exhibited have been addressed, I feel it is necessary to ensure that the PPP is clear and definitive on two of these matters, as noted below:

1) Edward St terrace:

The PPP states that the height of the terrace dwelling fronting Edward St will be 2 storeys/3 storeys including any attic. This is appropriate. If any approval is contemplated however, it will be necessary to impose a condition to ensure that the height limit is 2 storeys allowing TRUE attics to occupy the roof space. The Ashfield Council DCP defines what is a 'true' attic, as opposed to a further residential floor. This is particularly important given the LEC decision in case 10695 of 2008 for a site at 67-75 Smith St (barely 100m away) where the floor area and form/roof structure of what was proposed as 'attic' was held by the Court to be a full floor, not attic, so that the resultant terrace was 3 (not 2) storeys and consequently rejected as not in keeping with the locality and streetscape.

2) Smith St trees/landscape elements

The PPP notes that the line of wine glass palms fronting Smith St will now be preserved along with the nearby brushbox. However the significant fig at the corner of Edward and Smith Sts is not listed for retention (despite being depicted on plan and noted in the heritage assessment) and it should be.

Again, there are other significant trees on the site which should be retained. The PPP gives no consideration to the existing trees and vegetation between the canal and the former goods line – this area contains a number of significant trees yet the entire area is proposed for what will be the largest and bulkiest building on the site!!

I wish to make further comment on the following matters:

EXTENSIONS TO THE FOUR SILOS

However, I do not accept the argument advanced for the replacement of the iron extensions on top of the group of four silos with three levels of modern glass clad residential units. These are the highest structures on the site and that height should reduce, not increase. Height limits under the Marrickville LEP 2010 (gazetted in December 2011) are relevant particularly given the Planning Assessment Commission's March 2012 decision MP08_0195 - Concept Plan for 78-90 Old Canterbury Road Lewisham where 2 buildings facing the goodsline/Greenway are to be a maximum permitted height of 10 storeys. Iron extensions are removed for the six silo group and not replaced on top – this should also occur for these four silos (which will still be 10 storeys in height). This will have the added benefit of eliminating night glare intrusion and privacy/overbearing concerns for the existing adjacent residences in Edward St (and those to come, when the three industrial buildings are redeveloped).

RETAIL FLOORSPACE

My August 2011 letter noted the numerous flaws and deficiencies in the Economic Impact Assessment (EIA) (March 2011) completed by Hill PDA for the then Concept Plan. I am concerned (and somewhat surprised) that the REVISED EIA dated December 2011 as 'Final' is **WORD FOR WORD THE MARCH 2011 DOCUMENT**, aside from some revised percentages and one or two deleted/inserted paragraphs that presumably reflect the variations in retail/commercial floor space mix now proposed under the PPP.

This is particularly concerning when it is this December 2011 document that has been submitted (with the PPP) in March 2012, which is well **after** the PPP for MP08_0195 was available (November 2011) for inspection (proposed retail/SOHO/commercial could have been verified), **after** the Department's assessment report and recommendation (January 2012) on MP08_0195 and it seems, **AFTER THE PAC'S DETERMINATION (15/3/12)! The PAC had also determined the Marrickville Metro PPP by this time.** Given the stated methodology of this EIA, it is unacceptable to be re-submitting (error-ridden) base data that has not been updated, particularly when (benign) inferences and conclusions are then stated, all favourable to the PPP.

At the risk of re-stating the concerns I raised in my August letter (which appear to have been ignored by the writer of the EIA), I note the following:

From Executive Summary - 1) Leichhardt Marketplace and Parramatta Rd retail/commercial areas remain excluded from consideration in PTA or STA – no reason given, despite evidence of their regular use by existing residents. 2) repetition of unsupported statement re ‘dual income and cash rich’ newer residents ‘likely to further increase demand for retail floor space’. (NOTE: recourse to internet buying and current reported retail malaise). 3) no substantiation of suggested total of 5,750sqm retail across all adjacent sites 4) no rationale supplied for what is a ‘significant impact’ – infer 10%. Dismisses reductions in turnover of 7.8, 4.4 or 5% but notes that ‘gentrification’ will benefit Summer Hill 5% (why is this now significant?) A reduction in trading level of \$1.4m for Lewisham is ‘not likely to adversely affect the quality of retail provision’ while the March 2011 EIA noted that the then lesser reduction of \$0.3m was not significant. 5) No update to acknowledge the rezoning to Neighbourhood Business for more than 50% of Lewisham’s shops via MLEP2011; Council Urban Design Study initiatives not addressed.

From the Main Report – numerous factual and other errors, as follows:

P14: bus 413 Campsie/City passes the site

P17/18:: March 2012 Report has not followed the stated methodology as current PPP’s and determinations for relevant sites not addressed (as noted above). See also 4.2 and 4.4 (p30) and table (p33) where updates are required. NOTE unsupported statements about trading levels of Summer Hill with no base data upon which suggested 5% increase in trading levels (see executive summary) can be made!

P34/38 Chpt 5: Trade Area Analysis requires complete revision to reflect recent PAC decisions (as above) and appropriate trade area identification (viz including Leichhardt Marketplace). Floor space noted at p34 has not been updated and conflicts with the table on p15.

P44//52 Chpt 7: This key chapter is unchanged aside from where revised calculations are inserted (due presumably to the retail/commercial floor space changes now proposed by the PPP). This appears to have been no more than a ‘search and replace’ exercise as there is no new or revised analysis offered and the conclusions remain unaltered from the March 2011 report.

The Department should return the December 2011 EIA Report to the Applicant and require a re-write which addresses the methodological and data errors identified, including the ramifications of the recent PAC decisions.

Yours Faithfully

David Rollinson
PhD; MSc(Architecture)(Conservation); MA(Conflict Resolution); BA; Dip Urban Studies; Dip Town & Country Planning