

**SUBMISSION FROM MARRICKVILLE COUNCIL
TO THE DEPARTMENT OF PLANNING & INFRASTRUCTURE
REGARDING THE PREFERRED PROJECT PLAN
FOR THE PROPOSED SUMMER HILL FLOUR MILL DEVELOPMENT**

20 APRIL 2012

INTRODUCTION

This is a Council officers' submission. Due to Council reporting timeframes, it has not been possible for Council to consider this submission before the 20 April 2012 submission deadline. This officer's submission will be reported to Council's 1 May 2012 meeting, and at that time Council may resolve to provide additional comments.

This submission evaluates a Preferred Project Report (PPR), prepared on behalf of EG Funds Limited, for the former Allied Mills Concept Plan application under Part 3A of the Environmental Planning and Assessment Act 1979, for a mixed use residential, retail and commercial development at 2-32 Smith Street, Summer Hill (Allied Mills). The projects has not been formally re-exhibited, Council has been invited to provide comments on the PPR by 20 April 2012.

Council understands the revisions to the original Concept Plans proposed within the PPR for Allied Mills to be:

- Building 1A now proposes a six (6) storey presentation to Longport Street, and overall six (6) storey podium, a central ten (10) storey element and a nine (9) storey element on the south-western side;
- Building 1A at the ground floor level now includes terrace style dwellings providing dwelling entries accessed from the new street and potential to address a future Greenway in the light rail corridor;
- Building 5D fronting Edward Street has been reduced from four (4) storeys to three (3) storeys;
- Building 2A (the Mungo Scott building) all residential uses have been removed. Only commercial employment space is provided within this building above ground floor level with retail retained at ground level;
- Building 3D has had an additional level added, comprising two (2) additional apartments resulting in a seven (7) storey building adjoining the adapted silo;
- the extension of the new road behind the Edward Street properties will no longer link through to Old Canterbury Road;
- building 5E is an adaptive reuse building that has been identified as being suitable for a potential childcare operation;
- the maximum size of individual retail tenancies is 150 to 200 m² and dispersed along the public thoroughfare areas of the site confirming that a supermarket would not be possible;
- the staging plan has been amended to include the provision of public access through the site to the new light rail stop as part of Stage 1;
- confirmation of the provision of deep soil planting to Edward Street;
- amendment to the access over the Hawthorne Canal, reducing the amount of coverage of the canal as agreed with Sydney Water;

- response to flood management concerns; and
- update of the Statement of Commitments.

BACKGROUND

On 28 October 2010, the Minister for Planning advised Council that the proposed Allied Mills site development had been declared as a Major Project under Part 3A of the Environmental Planning and Assessment Act, 1979. On 1 December 2010, Council wrote to the DP&I identifying key issues and suitable Director General's Requirements (DGRs) for a concept plan for the Allied Mills project. A number of these were incorporated into the final DGRs issued on 16 December 2010.

An Environmental Assessment Report, prepared on behalf of the proponent, for the Allied Mills site was publicly exhibited between 29 June 2011 and 12 August 2011. At its meeting of 16 August 2011, Council considered a report on the proposed development and resolved to make a submission based on the contents of the report. Council's submission was forwarded to the DP&I on 18 August 2011.

On 30 March 2012, Council received further correspondence from the DP&I regarding the preparation of the PPR in response to comments received during the public exhibition period of the Environmental Assessment.

COMMENTS ON THE PPR

Urban Design

Council's August 2011 submission had not raised issues in relation to the density of development on the section of the site within the Marrickville LGA adjacent to Longport street, or in relation to the density of development across the site overall. It appears the PPR has not substantially altered the density of development, so it remains that no density issues are raised in this submission.

The original concept plan that located the 10 storey building mass at the north-eastern end of Building 1A closer to Longport Street was considered acceptable as it provided a landmark building to the north-eastern corner of the development, while still being setback approximately 20m from Longport Street and Smith Street to maintain a large landscape buffer. The PPR proposal now presents Building 1A as a 6 storey podium with the 10 storey building mass push back to the middle of building. This is also considered acceptable as it gives greater articulation to the building as viewed from the north of the site and a more human scaled form from adjoining streets.

The only impact of the amended massing may be to reduce solar access to the north-eastern side of the south-western building element of building 1A, (which is now increased 1 level to 9 storeys), and this should be investigated. Either massing causes no shadowing impact to any existing dwellings and is unlikely to cause significant shadowing impact to future surrounding residential flat buildings due to the large separations to other master planned buildings. There would be different but no significantly greater shadowing of adjoining open space.

The original concept plan for building 5D for a 4 storey form and residential flat building typology as a minor part of development along Edward Street contrasting to the

predominantly terrace typology was considered appropriate. It identifies one of the main entrances of the development and integrates with the scale of the main eastern part of the site. While considered unnecessary, the reduction to a 3 storey form ensures all development along Edward Street fits with the low scale residential streetscape of Edwin Street.

The removal of all residential elements from building 2A (Mungo Scott building) and 150-200m² maximum sized retail is supported, as it will increase the mixed-use character of the development to include a vibrant commercial/retail hub in the centre of the site.

The increase of building 3D at the south of the site by an additional level to 7 storeys is assessed as causing no visual or other impacts, and provides an appropriate scale to the southern edge of the site and to the McGill Street Master Plan scale opposite.

The amendment of the staging of the project to include access to the light rail station and connection through to McGill Street Master Plan open space and Lewisham in Stage 1 is strongly supported, as it is crucial to ensure the Summer Hill to Lewisham permeable connection is achieved at the earliest stage.

The confirmation that deep soil planting along the Edward Street frontage is achieved by redesign of basement car parking back from the Edward Street boundary to now be under the building from is supported.

Overall it is considered that the proposed form and scale of the development, as amended in the PPR is appropriate for the site and its context and no objections to the proposal are raised on urban design grounds.

The open space between the Summer Hill Flour Mill development and Lewisham Estates development at and around the junction between the Greenway/Light Rail corridor and Summer Hill to Lewisham pedestrian/cycle link will have an important public place function. The detail design should investigate the place function of this space and consultation take place with the Department of Transport to ensure a suitable landscape design treatment of the Greenway and Light Rail crossing/station is achieved. Given the different character and high level of activation of this area it is considered the design should be different to the 'standard' Light Rail stop design, fencing and landscape treatment generally proposed for the Greenway/Light Rail corridor.

Given that the DP&I is the responsible authority for the Summer Hill Flour Mill development, Lewisham Estates and Light Rail / Greenway Part 3A projects, ensuring collaborative and coordinated design, assessment and decision making is paramount to ensure an appropriate outcome is created for this place.

Dwelling Mix

Council re-iterates its previous comment that the range of dwelling mix in the PPR is generally supported, however future development applications should consider the inclusion of studio apartments. The PPR's response to Council's previous comments on this issue indicates that the issue of dwelling mix will be addressed in future development applications. Council would again request that studio apartments be included as part of the dwelling mix in future applications due to the high proportion of lone person households indicated in the Hill PDA Economic Impact Statement.

Waste Collection

Council again requests that waste predominantly be collected from within the basements of the development. To facilitate this, the detail design must ensure that the basements can accommodate efficient and safe waste trucks access, manoeuvring and collection to waste truck specifications, without inconveniencing residents or workers.

Traffic, Transport and Parking

Council concurs with the seven key issues raised by the DP&I in relation to traffic, transport and parking the way these have been addressed in the ARUP PPR traffic/transport report. Council generally supports the conclusions and proposed actions in this report.

In relation to parking, it is noted ARUP report has recognised that Marrickville Council's parking policies constrain parking provision more than Ashfield Council's, and are recommending a constrained approach that reconciles the differences between the two councils. Council notes the report has considered the important role of carshare, and that provision has been made for carshare parking. Provision of a variety of parking options (mobility parking, pick/up drop/off areas etc.) as outlined in the report is also supported.

Proposed works arising from the audit of walking/cycling routes are supported, although as discussed below, Council would like to see construction of the GreenWay path between Old Canterbury Road and Longport Street included in the works program, funded by the proponents of the Allied Mills and Lewisham Estate developments with agreement from Transport for NSW as landowner. Council would also like to see identification of Council bikeplan bicycle routes in the vicinity of the site, and how these routes can link to the site. It appears almost all the items on the works program are related to pedestrian routes, not bicycle routes.

Whilst it is noted that the ARUP report has identified the need for bicycle parking at key locations away from the site, it has not analysed the provision of bicycle parking within the site. Council would like to be reassured that there is not only sufficient bicycle parking to meet demand, but the facilities are appropriately located according to resident and visitor use. Details can be considered at the development application stage.

Council considers the walking/cycling route through the development to the light rail stop to be of prime importance, and supports the proposal in the PPR that it proceed as a Stage 1 work.

GreenWay path

Council recognises there is an important one-off opportunity for the proponents of the Allied Mills and Lewisham Estate developments to provide, as a 'work-in-kind', a shared walking/cycling path parallel to the light rail line between Old Canterbury Road and Longport Street – a distance of approximately 300m. The path alignment would be in accordance with GreenWay path designs that were approved by the NSW Government as part of the approval of the Inner West Light Rail Extension and GreenWay. Works would need to be subject to an agreement between the two proponents and Transport for NSW (TfNSW) as the path would be almost wholly within the TfNSW-owned light rail corridor.

It is noted that the ARUP traffic/transport report for the PPR has mapped key walking/cycling routes around the site, and the GreenWay path route has been included as Route No.6. Council supports the recommended walk/cycle improvement works, but notes that construction of the GreenWay path has not been included in the works program.

Provision of this section of GreenWay path would deliver immediate walking/cycling access benefits to/from and around the light rail stop and the two developments. The pathway section could be constructed relatively easily as a Stage 1 work at modest cost. Planning and concept design work for the path has already been completed, and it would appear there would be no significant technical impediments to construction of this pathway section along this flat section of corridor between Old Canterbury Road and Longport Street. By linking the path to these two streets, no 'dead-end' sections (with associated security issues) would be created.

If construction of the 3m-wide concrete path was costed at the upper level of \$1,000 per linear metre, the total cost over 300m would be of the order of \$300,000. With signage and landscape improvements, the total cost would be of the order of \$500,000 – representing an average contribution of around \$700 per dwelling across both developments. This is a modest contribution, particularly considering the significant benefits which would flow to the proponents of these developments, future residents and the wider community.

Affordable Housing

Council previously raised objection to the exclusion of affordable housing from the development. Responses to the issue of affordable housing contained within the PPR state that *'While affordable housing is not specifically provided the development proposes significant contribution to public amenity and infrastructure and a range of housing choice'*, and further that *'The proposal will also deliver a heritage outcome for the retention and re-use of a significant number of buildings and spaces on the site, and will provide 34% of the site as accessible public open space.'*

Council does not consider that the provision of open space and housing mix precludes the need for affordable housing. Further, the development of this site and the adjoining McGill Street precinct, provides the opportunity for the Department of Planning & Infrastructure to co-ordinate affordable housing provision across both sites. Council does not support the claim that *'A further restriction requiring affordable housing provision is not viable in this context'*.

Developer Contributions and Voluntary Planning Agreements (VPA)

Council previously raised concerns about the absence of a VPA for the site to address the provision of services and infrastructure. The current preferred project report reiterates that a VPA will not be prepared for the site. The report claims that the development provides significant community benefit through the provision of 8,400m² open space and access to the future Greenway and light rail. The applicant has again noted its intention to pay section 94 contributions in accordance with Council's plans.

Council remains concerned that this arrangement will result in the underprovision of local infrastructure and services. Council still considers it necessary to assess what public infrastructure might be required, and if necessary, require additional development contributions or dedications for public infrastructure that are different or additional to those required through each Council's Contributions Plans via a VPA. As discussed above, the GreenWay path between Longport Street and Old Canterbury Road is considered an important piece of public infrastructure that could and should be provided by the proponents of the Allied Mills and Lewisham Estate development subject to agreement by landowner TfNSW.

Long Nosed Bandicoot

Council notes and supports the proponents PPR recommendations that the more detailed environmental assessment of bandicoot habitat take place with future development applications and that a landscaping solution for the site that supports foraging opportunities for bandicoots be a condition of any approval. This outcome will need to be coordinated with the GreenWay and Lewisham Estate site.