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Former Allied Mills Flour Mill Site

2-32 Smith Street, Summer Hill

27 August 2010



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LIST of ATTACHMENTS

- Attachment 1: Summer Hill Flour Mill Site Concept Plan prepared by Hassell
- Attachment 2: Urban Design Report prepared by Hassell
- Attachment 3: Capital Investment Value assessment prepared by WT Partnership
- Attachment 4: Transport Assessment prepared by ARUP
- Attachment 5: Heritage Impact Assessment by John Graham and Associates
- Attachment 6: Hawthorne Canal Flood Assessment and Stormwater Management Strategy prepared by Meinhardt Infrastructure and Environment
- Attachment 7: Community Consultation Report, prepared by Urban Concepts
- Attachment 8: Evaluation of Economic, Demographic and Social Factors in Determining the Planning Classification of the Site prepared by Daly Research Systems
- Attachment 9: Detailed Environmental Site Assessment prepared by Aargus Australia
- Attachment 10: Flora and Fauna Assessment prepared by Travers Environmental
- Attachment 11: Target Long-nosed Bandicoot Survey prepared by Travers Environmental
- Attachment 12: Geotechnical Investigation Report prepared by Brink & Associates
- Attachment 13: Aboriginal Heritage Impact Assessment prepared by AHMS
- Attachment 14: Machinery and Equipment Heritage Assessment prepared by Godden Mackay Logan Heritage Consultants
- Attachment 15: Infrastructure Issues Report prepared by Meinhardt Infrastructure and Environment
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1.0 INTRODUCTION

This Preliminary Environmental Assessment (PEA) Report has been prepared on behalf of EG Funds Management by SJB Planning Pty Ltd in accordance with Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979). The PEA relates to the proposed mixed use redevelopment of the former Allied Mills Summer Hill flour mill as 2-32 Smith Street, Summer Hill.

This report is submitted to the Department of Planning to assist in the consideration of the declaration of the proposal under clause 6 of *State Environmental Planning Policy (Major Development) 2005* as a project to which Part 3A of the EP&A Act 1979 applies and for the issue of the Director General's Requirements (DGRs) for the environmental assessment of the project.

The proponent seeks to re-develop the site for mixed use, 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 has been developed to complement the Masterplan prepared by Marrickville Council for the adjoining McGill Street Precinct. The McGill Street Precinct Masterplan 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 Masterplan have been incorporated into the draft comprehensive Marrickville LEP which is due to be placed on statutory exhibition imminently.

The two sites are separated by the former goods rail line linking White Bay to Dulwich Hill which is in the process of conversion for an extension of the current light rail line linking Lilyfield to Central Station and the Greenway project.

The proposed redevelopment and renewal of the Summer Hill Flour Mill Site and the McGill Street Precinct would deliver a mixed use precinct focused upon the light rail and Greenway that bisects the two precincts. The mixed use re-development of the sites will facilitate public access to the proposed light rail to the benefit of the surrounding existing residential areas.

The Concept Plan for the Summer Hill Flour Mill Site anticipates 280-300 dwellings, 3,500-4,000m² of commercial space and 2,500-2,800m² of retail space.

The proposal is development of a kind described in Group 5 in Schedule 1 of *State Environmental Planning Policy (Major Development) 2005* being residential, commercial or retail projects with a capital investment value (CIV) of more than \$100 million.

The PEA is supported by a Quantity Surveyors assessment that has concluded that the Concept Plan has a CIV of \$164,900,000 million, well above the minimum \$100 million threshold.

The proposal is therefore considered to be a project to which Part 3A of the EP&A Act 1979 applies in accordance with the Major Project SEPP.

Having regard to the above, the proponent is seeking confirmation from the Minister for Planning that the proposed development is a Major Project under Part 3A of the EP&A Act 1979.

Should the Minister determine that the proposal is a development that is a Major Project, the proponent requests:

- that the Minister authorise the submission of a Concept Plan and Project Application for proposed stage one development; and
- that the Director-General issue requirements for the preparation of the Environmental Assessment (EA) for submission with the Concept Plan and Project Application.



This report provides an overview of the proposal and identifies potential key issues to assist in the formulation of the Director-General's Requirements. These requirements will be addressed in the subsequent EA Report.



2.0 SITE DETAILS

EG Funds management controls land described as the Summer Hill Flour Mills Site. The site is known as 2-32 Smith Street, Summer Hill. 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 is within the Marrickville Council Local Government Area, as the canal forms the administrative boundary between these two local authorities.

The land holding comprises the following legal descriptions:

Land owned by EG Funds 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 and within Marrickville LGA:

- Lot 1 DP900501

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

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 greenway
- The site is currently occupied by industrial and administrative buildings associated with the former use as a flour mill
- The existing structures include the six level "Mungo Scott" mill building, the high rise concrete silos, two and three level administration building, amenities building and associated car parking areas and landscaping



Figure 1: Aerial of subject site.



3.0 SITE CONTEXT

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.

The area that is the subject of this PEA forms the majority part 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 separated from the remainder of the industrial precinct in the Marrickville Council area to the east, by the Rozelle freight rail line corridor.

In a broader context, the precinct 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 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 site adjoins the proposed Greenway, for which a Masterplan has been prepared and adopted to convert the Rozelle freight rail line into a pedestrian and cycleway link, along with the proposed extension of light rail services along the former freight line.

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.

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



4.0 SITE APPLICATION HISTORY

Planning Proposal applications were submitted to Ashfield and Marrickville Councils in December 2009 seeking gateway determinations to commence the rezoning process for the subject land to facilitate the proposed mixed use redevelopment. These applications have yet to be progressed or reported to the respective Councils.

The material submitted in support of this PEA is the same as the material submitted with the Planning Proposal applications.

If the proposal is declared as a kind of development to which Part 3A applies, these applications will be formally withdrawn.



5.0 PROJECT OUTLINE

5.1 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 Masterplan has been prepared and adopted to guide the mixed use development of the land. It is understood that the imminent formal exhibition of the Draft Marrickville LEP 2010 includes land use zones and development controls that are consistent with the McGill Street Precinct Masterplan.

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 coming conversion of the goods rail line to light rail use. The Summer Hill Flour Mills 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 Masterplan and in the Masterplan proposed for the Summer Hill Flour Mills Site under this Concept Plan proposal.

5.2 The Concept Plan

The proposed Concept Plan has considered and addresses:

- Indicative built form and land uses;
- Traffic and transport management;
- Heritage considerations;
- Open space provision;
- Flooding and stormwater management; and
- Development staging.

Indicative built form and land uses

The Concept Plan will determine the proposed building heights, setbacks, developable area, land uses and urban design principles. The Concept Plan derives from the Urban Design Report undertaken by Hassall (Attachment 2) for the land owner.

The proposed Concept Plan provides for:

- A new network of public streets and open space;
- New two to three level terrace form dwellings fronting Edward Street;
- 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;
- New five to ten storey residential buildings in the north eastern corner of the site adjacent to Longport Street;
- 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;
- Conversion of the banks of concrete silos to residential apartments;



- A new nine level residential building to the south of the Mungo Scott Building;
- A new six level residential building in the southern most portion of the site;
- Identification of the location for active uses and public domain interaction;
- Location of basement car parks and basement entries; and
- A mix of, one, two, three and four bedroom dwellings.

The proposed Concept Plan for the Summer Hill Flour Mill Site anticipates 280-300 dwellings, 3,500-4,000m² of commercial space and 2,500-2,800m² of retail space.

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 the area of these sites.

Traffic and transport management

The request for the declaration of the proposal as a project to which Part 3A applies is supported by a detailed Traffic and Transport analysis prepared by ARUP. This analysis identifies proposed transport infrastructure upgrades, car parking requirements, vehicle access points and intersection performance.

Heritage considerations

A detailed Heritage Impact Assessment of the site has been prepared by John Graham and Associates. 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 structures proposed to be demolished.

Open space provision

The Concept Plan proposes approximately 8,400m² (34% of the site) of 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) of space is proposed to be provided as new streets, footpaths and landscaped verges.

Flooding and stormwater management

A detailed flood assessment has been undertaken by Meinhardt Infrastructure and Environment into the 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 water management. These investigations have been undertaken in conjunction with Sydney Water the owners of the canal.

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.

Development staging

The Concept Plan identifies four stages for the development of the site. It is intended that a concurrent 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.



The proposed staging and sequencing plan is provided at Attachment 1 within the proposed Concept Plan documentation.

5.3. Project Application

The Project Application to be lodged concurrently with the Concept Plan will facilitate stage one development and will include:

- Subdivision to create the four development lots;
- Demolition of the Administration building;
- Demolition of the rail siding encroachments to the west of the Mungo Scott building;
- Provision of a new street framing stage 1;
- Excavation for a new basement car park to serve stage 1;
- Construction of the new buildings associated with Stage 1; and
- Upgrade and provision of necessary physical infrastructure to serve Stage 1.



6.0 CAPITAL INVESTMENT VALUE

Consistent with Schedule 1 of the SEPP (Major Development) 2005, projects in Group 5 comprising residential, commercial or retail projects with a CIV of \$100 million or more are projects to which Part 3A applies.

Consistent with the definition of Capital Investment Value contained within the *Environmental Planning and Assessment Regulation 2000* the CIV of the proposal has been assessed at \$164,900,000 (excluding GST). The basis of this determination is set out in Attachment 3 of this PEA.



7.0 RELEVANT PLANNING INSTRUMENTS AND CONTROLS

7.1 Overview

The following planning instruments and policy documents are of relevance to the proposed development. These planning controls will be addressed in the EA Report.

- State Environmental Planning Policy (Major Development) 2005.
- State Environmental Planning Policy No 55—Remediation of Land
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004
- State Environmental Planning Policy No 65—Design Quality of Residential Flat Development
- Ashfield LEP 1995
- Marrickville LEP 2001
- Sydney Metropolitan Strategy
- Draft Inner West Subregional Strategy
- Draft South Subregional Strategy
- Ashfield Urban Planning Draft Strategy 2010

The key relevant provisions applicable to the proposed development and the subject site is discussed below:

7.2 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 of a kind to which Part 3A applies if the development for the purpose of residential, commercial or retail projects with a capital investment value of more than \$100 million.

The proposal is a development to which Part 3A of the Act applies in accordance with the Major Development SEPP, as it has a capital investment value of \$164,900,000 (excluding GST).

7.3 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.

The required EA will undertake a review of these reports and the preparation of the recommended Remediation action Plan (RAP) to ensure the identified low risk to human health is addressed.

7.4 State Environmental Planning Policy (Infrastructure) 2007

The project is likely to include 280 to 300 dwellings, 3,500-4,000m² of commercial space and 2,500-2,800m² of retail space.

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.



A detailed transport and traffic assessment has been undertaken by ARUP and will be further considered as part of the required EA. The traffic assessment undertaken 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 traffic assessment has included the potential traffic generation from the redevelopment of the McGill Street Precinct consistent with the Masterplan adopted by Marrickville Council.

7.5 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 consumption reduction targets that should be met by new development. The residential components of the Concept Plan and Project Plan application will be required to demonstrate compliance with the relevant targets.

Details of this compliance will be provided in the required EA for the application.

7.6 State Environmental Planning Policy 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 and Project Plan application.

The required EA will need to demonstrate that the proposal is consistent with the relevant design principles and the design quality outcomes.

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.

7.7 Ashfield Local Environmental Plan 1995

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 the proposed Concept Plan.

7.8 Marrickville Local Environmental Plan 2001

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.

7.9 Sydney Metropolitan Strategy

The Sydney Metropolitan Strategy is the State Government's plan for managing the growth of Sydney over the next 25-30 years. The Strategy plans for population growth, new housing, new jobs, increases in industrial land and commercial and retail floor space over a 25 year period.



The Metropolitan Strategy identifies seven key strategies comprising Economy and Employment, Centres and Corridors; Housing, Transport, Environment and Resources, Parks and Public Places and Governance and Implementation.

The pursuit of a mixed use development of the precinct is considered to be consistent with the broad policy directions in relation to Economy and Employment, Centres and Corridors, Housing, and Transport.

A key element of the Sydney Metropolitan Strategy has been the preparation of subregional plans. The subject site is within two local government areas, each of which is subject to a different draft Subregional Strategy.

The Ashfield LGA is located within the Inner West Subregion and the Marrickville LGA is located within the South Subregion.

Each of these draft strategies is considered separately below.

7.10 Draft Inner West Subregional Strategy

The Draft Inner West Subregional Strategy was exhibited in 2007. Under the Draft Inner West Subregional Strategy the land the subject of this PEA 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 Sub-regional 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 Mills 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 has demonstrated how the land not covered by the Concept Plan 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.

A mixed use re-development is also consistent with the recently released Ashfield Urban Planning Draft Strategy 2010 which supports the investigation of the Summer Hill Flour Mills Site for mixed use redevelopment.

7.11 Draft South Subregional Strategy

The Draft South Subregional Strategy was exhibited in 2007. 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:

- SOA1.9.1 – 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 Masterplan for the adjoining McGill Street Precinct and proposes to incorporate the principles of this Masterplan into the Draft Comprehensive LEP being prepared for exhibition.

The proposed Concept Plan is consistent with this approach.

7.12 Ashfield Urban Planning Draft Strategy 2010

Ashfield Council have been in the process of preparing an Urban Planning Strategy to guide and inform the Draft Ashfield LEP 2010. The draft strategy has recently been released for public exhibition and comment.

The draft strategy includes strategies to consider a mixed use redevelopment of the Summer Hill Flour Mills 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 these considerations and draft strategies.



8.0 AGENCY CONSULTATIONS

8.1 Department of Planning

Consultation will be undertaken with the Department of Planning to determine the local issues that may influence the development of the project. Open discussions will be maintained with the Urban Assessments section of the Department of Planning to inform the progress of the agency consultations and key issues affecting the project.

8.2 Ashfield and Marrickville Councils

Liaison has been ongoing with both Councils regarding the initial Planning Proposal for the site. The proponent is committed to continuing the dialogue with staff, councillors and the community in the finalisation of the EA.

8.3 Roads and Traffic Authority

No formal consultations have been carried out with the RTA to date. In accordance with the provisions of State Environmental Planning Policy (Infrastructure) 2007 the EA Report will be referred to the RTA for comment. Prior to the lodgement of the EA Report preliminary discussions will be held with the RTA.

8.4 Department of Transport

The proposed development is located along the alignment of the coming light rail extension. Consultation will continue regarding implementation of light rail stops and integration of the proposed redevelopment with the light rail extension.

8.5 Sydney Water

The Hawthorne Canal traverses part of the site and is owned by Sydney Water. The flood assessment undertaken has been prepared in consultation with Sydney Water and this dialogue will continue through the finalisation of the EA.

8.6 Public Consultation

The proposed mixed use redevelopment of the site has been subject to extensive preliminary consultation and community attitude surveys. The report on these considerations is included at Attachment 7.

The proponent is committed to continue the consultation undertaken to date and to continue to engage with the community and community groups.



9.0 KEY ISSUES

The key issues identified below will be outlined in further detail in the EA Report:

- Permissibility;
- Building Form;
- Traffic and Parking;
- Flooding and Stormwater Management;
- Environmentally Sustainable Design;
- Flora and fauna;
- Contamination;
- Heritage; and
- Subdivision.

9.1 Permissibility

The current zones do not permit mixed use development in the form proposed. The Concept Plan would need to address this matter. As identified in this PEA, the proposed mixed use development is consistent with the approach to the redevelopment of the adjoining McGill Street Precinct and the directions contained in the Ashfield Urban Planning Draft Strategy 2010.

9.2 Building Form

The building form is presented in the Concept Plan providing a low scale edge to Edward Street to integrate with the existing housing forms. Taller buildings are located more centrally on the site and in locations where amenity impacts to existing residential dwellings can be avoided.

The strategy for the site is to continue to reflect the industrial heritage of the site through the retention of the iconic Mungo Scott building as a prominent element when viewed from the north and looking south and for the silos to remain as the tallest and most prominent landmark structures on the site, again to reflect the site's past use and occupation.

The Concept Plan also proposes through site linkages and integration with the wider local context and the provision of publicly accessible open spaces.

The Project Application will address detailed architectural consideration of proposed stage one development.

9.3 Traffic and Parking

This PEA is supported by a detailed traffic and transport assessment prepared by ARUP. The assessment considers the impacts of the proposed development in conjunction with the impacts of the Masterplan prepared for the adjoining McGill Street Precinct.

The assessment has determined the range of infrastructure upgrades and management measures that would be required to manage traffic and to maintain overall performance of the surrounding road network within acceptable limits.

9.4 Flooding and Stormwater Management

This PEA is supported by a flood assessment of the Hawthorne Canal and a Stormwater Masterplan prepared by Meinhardt Infrastructure and Environment. The Concept Plan and Stormwater Masterplan has incorporated the recommended mitigation measures and WSUD



treatments of these assessments to ensure flood impacts associated with the canal are managed and the site is suitable for mixed use redevelopment.
A summary of the flood impact review will be incorporated within the EA report.

9.5 Environmentally Sustainable Design

The Concept Plan has been developed having regard to and integrating the principles of Environmentally Sustainable Design (ESD).

The EA will be required to fully address these initiatives and the measures incorporated into the design.

9.6 Flora and fauna

This PEA is supported by a flora and fauna assessment, including a targeted Long Nose Bandicoot survey. These assessments have identified that the development of the site would not have adverse impacts upon any threatened or endangered species.

9.7 Contamination

This PEA is supported by a Detailed Environmental Site Assessment prepared by Aargus Australia. The assessment has concluded that the site is suitable for mixed use residential development. The detailed considerations will be addressed in the required EA.

9.8 Heritage

A detailed Heritage Impact Assessment has been undertaken by John Graham and Associates which has identified the proposed re-use of existing buildings and structures is supportable on heritage grounds. The assessment has also considered the suitability of the proposed demolition of the rail siding awning encroachments as appropriate along with the demolition and interpretation of the clean wheat bin store.

The PEA is also supported by a Machinery and Equipment Heritage Assessment prepared by Godden Mackay Logan Heritage Consultants, an Historical Archaeological Assessment Report prepared by AHMS and an Aboriginal Heritage Impact Assessment prepared by AHMS

The recommendations within this report will be incorporated as part of the final design.

9.9 Subdivision

Subdivision of the development to create development lots will be included as part of the initial Project Application consistent with the proposed staging of the development.

These matters will be addressed in detail within the required EA.



10.0 RATIONALE FOR THE CONCEPT PLAN

10.1 Overview

The proposed Concept Plan for a mixed use redevelopment of the site will facilitate a range of positive outcomes for development within the Ashfield and Marrickville Council areas. This section outlines the range of positive outcomes that would result from the proposed mixed use redevelopment.

10.2 Urban Renewal

Operational activities have ceased on the former Allied Mills site with the relocation of milling operations to Picton on the outskirts of the greater Sydney metropolitan area. The cessation of milling operations has also ended the use of the adjoining freight rail line.

The locational characteristics that made the site attractive to milling and industrial uses in the early 20th century no longer apply to the site. The relatively tight pattern of urban streets, close proximity to residential neighbours, difficulty of adapting specialised industrial buildings to alternate industrial uses, poor heavy vehicle access and the relatively small site area combine to indicate that the site is no longer optimal for industrial purposes.

The site characteristics, pattern of surrounding development and land uses, and the proposed redevelopment of the adjoining McGill Street Precinct for residential and commercial purposes, support a consideration of the redevelopment of the Summer Hill Flour Mill Site for a range of retail, commercial, residential and recreation uses. A mixed use redevelopment of the site can also utilise the locational advantages of the site and facilitate adaptive re-use of the heritage significant structures on the site.

10.3 Planning Framework Consistency

A Concept Plan approach to the mixed use redevelopment of the site 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 has demonstrated how the balance of the land on Edward Street currently zoned industrial, but not covered by this proposed Concept Plan, could also be equitably redeveloped.

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 the coming light rail and Greenway linkages.

10.4 Maximise Existing Rail Stations and Potential Light Rail Catchments

Encouraging public transport patronage rather than private car use involves several key factors. These include maximising the coverage of high quality services, particularly high-speed, high-capacity transport, and maximising the population's access to these services. A transit-oriented development of the site would locate residential and employment land uses in a site ideally located for such a development. With the proposed rezoning of the adjoining McGill Street Precinct for transit-oriented development, the opportunity to provide a complete planning solution for this area should be embraced.



Increased development intensity and diversity of land use should be encouraged within the catchment of the existing rail stations at Summer Hill and Lewisham and the proposed light rail service utilising the former goods rail line adjoining the site. This will increase the number of residents and workers with access to public transport and associated services and facilities near the stations, as well as reinforcing the village centre of Summer Hill.

10.5 Reinforce the Greenway Masterplan

The Greenway is a joint initiative between the councils of Marrickville, Ashfield and Leichhardt. The Greenway provides a linkage between the Cooks River and Iron Cove, primarily focused upon the former Rozelle rail freight line corridor. The Greenway is envisioned to accommodate lineal urban green space as well as transport options in the form of light rail, cycle paths and pedestrian path linkages. The Greenway in association with the coming light rail has the potential to reinforce and link a number of existing pedestrian and cycleway routes in the area to afford alternate recreation and transport options for surrounding residents. The mixed use development of the precinct will support and foster the delivery of the Greenway Masterplan.

10.6 Heritage Conservation

The background studies undertaken to date have included assessment of the heritage significance of the former Allied Mills site and the existing buildings. The proposed Concept Plan outlines the proposed retention and reuse of many of the structures and buildings on the site.

The Concept Plan proposes an implementation strategy for the re-use of those buildings to ensure they retain economic as well as heritage value and is the most viable approach to ensuring the long term protection and conservation of this form of industrial infrastructure.

10.7 Landuse Conflicts

The draft subregional strategies for the Inner West and South subregions propose conflicting land use classifications that will reinforce and exacerbate the current land use conflict between residential and industrial uses.

The proposed Concept Plan for the Summer Hill Flour Mill Site avoids the creation of a conflict with the McGill Street Precinct as well as removing and resolving the current land use conflict between the industrial land and the residential uses particularly on the western side of Edward Street. The current nomination of the land as Category 1 employment land in the draft Inner West Subregional Strategy would reinforce this conflict.

The current categorisation in the draft strategy has failed to recognise that the attributes of the precinct no longer align to the needs of industry, nor recognise the limited capacity for the existing heritage structures and buildings to be converted to alternative industrial uses. The Category 1 nomination also fails to recognise the transition of employment demand away from a traditional manufacturing role. As demonstrated in the Daly Research Systems report contained in Attachment 8 the incorporation of commercial/retail uses in conjunction with residential accommodation has the clear capacity to provide greater employment generation than industrial development of the land.

10.8 Housing Diversity

A redevelopment of the precinct for mixed uses provides the opportunity to provide additional housing choice and diversity in the area in conjunction with employment opportunities. This could retain the employment and wealth generating characteristics of the former industrial land uses in



conjunction with the provision of housing and housing choice to complement the largely single dwelling housing stock that is predominant in the area.

A mix of dwelling types may also facilitate a general increase in residential density to support the surrounding local centres and public transport.

10.9 Increased Open Space

The renewal of the current industrial precinct provides the opportunity to augment and improve linkages to the current and proposed open space along the Hawthorne Canal and former Rozelle freight rail corridor. This would improve the recreation opportunities in the locality in conjunction with the provision of pedestrian and cycleway facilities. The development principles prepared for the site identify the opportunities for the provision of access and linkages through the site from the current street network to the Greenway and the adjoining McGill Street Precinct.

10.10 Summary

There is a clear planning benefit in proceeding to a Concept Plan to support the mixed use redevelopment of the site. The development would support a transit-oriented development of the site that it is no longer viable for industrial use, removes land use conflict and provides an appropriate transition between traditional residential land uses and a proposed mixed use area centred on excellent public transport availability.

The broad development principles developed will guide a mixed use development that facilitates the adaptive reuse of heritage buildings and structures on the site, guides appropriate transitions between existing and future development forms and which delivers community accessibility to the proposed Greenway corridor and light rail stop.



11.0 CONCLUSION

This Preliminary EA Report identifies the key issues that will need to be addressed in an EA report to accompany the proposed Concept Plan and Project Plan applications.

The PEA is supported by detailed assessments of the key issues of urban design, traffic, heritage, flooding, contamination and flora and fauna. Further the PEA is supported by a detailed Community Consultation report addressing the community engagement undertaken to date and the results of the community attitude surveys undertaken.

This PEA demonstrates the proposed Concept Plan and Project Application is an appropriate response to the local context and is the result of significant detailed investigations and considerations. The proposed Concept Plan is a well reasoned and researched approach to the delivery of a high quality outcome for the site that responds positively to the site issues and broader context.

The PEA has been prepared to assist the Director General and the Minister for Planning in forming an opinion on the declaration of the project as a Major Project under Clause 6 of the Major Projects SEPP and for the drafting of the Director General's Requirements.

This report demonstrates that the project is generally consistent with the context of the site and does not raise any significant issues which cannot be addressed through detailed assessment and design.

The project will contribute to achieving a high quality mixed use development that complements the Masterplan adopted for the McGill Street Precinct and the light rail extension, creating a vibrant and diverse mixed use precinct. The development will augment the existing centres of Summer Hill and Lewisham. The development provides the opportunity for a diverse range of housing and some commercial floor space that is extremely well located to public transport and will provide a range of employment opportunities.

The Proponent looks forward to receiving the Ministers Part 3A declaration, and the Director General's requirements for this important project.

SJB Planning

Preliminary Environmental Assessment Report



ATTACHMENTS



Attachment 1

Summer Hill Flour Mill Site Concept Plan prepared by Hassell



Attachment 2

Urban Design Report prepared by Hassell



Attachment 3

Capital Investment Value assessment prepared by WT Partnership



Attachment 4

Transport Assessment prepared by ARUP



Attachment 5

Heritage Impact Assessment by John Graham and Associates



Attachment 6

Hawthorne Canal Flood Assessment and Stormwater Management Strategy prepared by
Meinhardt Infrastructure and Environment



Attachment 7

Community Consultation Report, prepared by Urban Concepts



Attachment 8

Evaluation of Economic, Demographic and Social Factors in Determining the Planning Classification of the Site prepared by Daly Research Systems



Attachment 9

Detailed Environmental Site Assessment prepared by Aargus Australia



Attachment 10

Flora and Fauna Assessment prepared by Travers Environmental



Attachment 11

Target Long-nosed Bandicoot Survey prepared by Travers Environmental



Attachment 12

Geotechnical Investigation Report prepared by Brink & Associates



Attachment 13

Aboriginal Heritage Impact Assessment prepared by AHMS



Attachment 14

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



Attachment 15

Infrastructure Issues Report prepared by Meinhardt Infrastructure and Environment



Attachment 16

Historical Archaeological Assessment Report prepared by AHMS