



Major Projects Unit  
Department of Planning & Infrastructure  
23-33 Bridge Street  
Sydney 2000

**Attention:** Mark Brown, Senior Planner  
Metropolitan and Regional Projects South

29 April 2013

**Re: 2-32 Smith St, Summer Hill**

**MP10\_0180 – Stage 1 Project Application for a mixed use development of the former Allied Mills site**

#### **A. Preamble**

The Allied Mills site and adjacent Lewisham Estate site (owned by Meriton) are in a critical location between the “urban villages” of Summer Hill and Lewisham, at the junction of the Western Rail Line, the Inner West Light Rail, the GreenWay Shared Use Path and two heavily trafficked roads (a regional and a state road). The two sites combined have the potential to showcase best practice urban design and sustainable living and could become a vibrant, attractive, prosperous, accessible, safe and pedestrianised hub in a prime inner city location. The development will be judged not just by the quality of its built form, but how well it connects to the precincts around it.

In our view the assessment of the above Project Application should aim to maximize the qualities of this unique site and to apply conditions and development assessment approaches which maximize pedestrian accessibility/permeability, sustainability best practise, activation, community connections and best practice urban design, place making and place management. We encourage the Dept. of Infrastructure & Planning (DoPI) to work with Ashfield and Marrickville Councils, Transport for NSW (TfNSW) and other public and private stakeholders to achieve a holistic, integrated approach to the precinct as a whole. The outcome will be of lasting benefit to residents, visitors and people making their way through the site to/from the Lewisham West Light Rail stop and the GreenWay.

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The content of this submission is consistent with issues and opportunities outlined in previous GreenWay Program communications, such as:-

- (i) Verbal and written presentation to the Planning Assessment Commission Public Hearing at Petersham RSL on 20 November 2012 re: Allied Mills Concept Plan;
- (ii) Written submission to DoPI dated 7 March 2013 re: Meriton's proposed modification to the concept plan consent conditions for Lewisham Estate;
- (iii) Notes of a meeting convened by Ashfield Council on 18 April involving representatives from DoPI, TfNSW, Marrickville and Ashfield Councils and the GreenWay Program re: the Lewisham West development precinct as a whole.
- (iv) Various individual submissions in previous years from GreenWay Steering Committee members re: specific issues of relevance to the Allied Mills site eg biodiversity, active transport, urban design.

## B. Introduction to the GreenWay

The GreenWay and Inner West Light Rail corridor runs North/South through the middle of the Allied Mills Flour Mill/Meriton site precinct. The GreenWay is approximately 5km long and follows the route of Hawthorne Canal and the Inner West Light Rail corridor (see map).

The GreenWay is a multi-purpose corridor containing cycling and walking paths, significant open space, recreational and sporting areas, bush regeneration sites, infrastructure and a range of sites of cultural, built form and historical significance. Several thousand people enjoy "getting out and about" in the Greenway every week, which makes it a significant resource for Inner West residents and visitors.

The GreenWay Program is funded principally by Canterbury, Marrickville, Leichhardt and Ashfield councils. Over the years funding has also been allocated by the NSW Government to several GreenWay projects eg open space and storm water improvements, sport, education and public art. In 2009 the GreenWay received a \$1.8 million grant from the NSW Environmental Trust. An Urban Sustainability Project team was established from 2009 to 2012. Project outcomes included bush regeneration, cycling events and training, upgrades to the GreenWay

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website, resident surveys, GreenWay Primary Schools Sustainability project, the GreenWay Festival and a number of GreenWay “Hub Days”. The project developed comprehensive strategies dealing with key sustainability issues along the light rail/GreenWay corridor, including active transport, biodiversity, public art and bush regeneration.

Following completion of the Environmental Trust funded project in 2012, the four councils committed on-going funding for two part-time positions, a GreenWay Place Manager and a GreenWay Coordinator. Their role is to implement the outcomes of the Urban Sustainability Project and continue to develop and implement the GreenWay vision in partnership with the community, the state government and key stakeholders.

The redevelopment of the Allied Mills/Meriton site presents a unique opportunity to achieve pedestrian and cycle access to the light rail and GreenWay, enhance community connections, increase activation and achieve other key aspects of the Greenway vision, most particularly best practice place making/management and improved urban sustainability.

## C. Detailed comments on the stage 1 Project Application

### C 1 Public access way to light rail, GreenWay and Lewisham Estate

The applicant’s landscape and site plan drawings show an 8m wide open space access way from Smith St to the light rail/GreenWay corridor. This is a critical area of public benefit and was accorded significance in the environmental assessment for the site and the concept plan approval (conditions 23 to 26). The applicant’s subdivision plan, however, only proposes a 3m wide public footpath, with the adjoining areas (5ms wide in total) remaining in private ownership. This makes them vulnerable to subsequent amendments during the development of portion 3, 4 and 5 of the site, which may constrain use of this critical space which provides public access from Summer Hill through the site to the light rail stop, the proposed GreenWay, Lewisham Estate, Lewisham Station and existing residential areas to the East. It is vital that the space remains intact (as envisaged in the landscape and site plan drawings) to maximize pedestrian access, comfort and safety and quality design outcomes.

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**The following is recommended:-**

**C 1 (i)** A consent condition is required which reflects the Concept Plan conditions 23 to 26 to achieve the open space and public access way requirements leading from Smith St to the light rail stop. This could be achieved through relevant notation on land title to avoid inappropriate land use modifications in the future.

**C1 (ii)** The width of the above public access way should be a minimum of 8ms, as per the applicant's landscape and site plan drawings, not 3ms as shown on the stage 1 Project Application diagram.

**C1 (iii)** The public access way should be under the control, maintenance (and preferably ownership) of the two councils (also taking into account the small section within Marrickville LGA immediately to the south of the Canal).

**C1 (iv)** The detailed design of the above public access way should reflect best practice open space design principles - see recommendation C2(i) below. Detailed designs should be developed in close consultation with relevant state agency and council staff and in accordance with relevant design guidelines (see section D).

**C 2 Design excellence**

The Allied Mills/Lewisham Estate precinct has the potential to showcase best practice design which will directly benefit property owners, approximately 1,600 residents living in the precinct, site visitors and users of the commercial/retail areas on site and people making their way through the site to/from the light rail stop and GreenWay from adjoining precincts. The Project Application documentation, however, appears to favour a pared back, "functionalist" design approach reflecting the site's industrial past. In our view this is a lost design opportunity.

**The following is recommended:-**

**C2 (i)** Appropriate conditions of consent should be applied to ensure design excellence in all its forms, including built form, adaptive re-use, water sensitive urban design (particularly in the areas referred to in C1 and C3), public art, street furniture and finishes, space activation (particularly adjacent to retail and commercial areas and the light rail/GreenWay corridor), lighting, signage, open space design etc to maximize pedestrian comfort and safety during the day and at night.

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**C2 (ii)** The applicant should be required to work in close consultation with relevant state agency and council staff during concept and detailed design and implementation. This includes appropriate consideration of on-going public domain management and maintenance issues/costs - see also recommendation C4 (ii). Designs should reflect relevant design guidelines, as per recommendation D(i).

### **C3 Works in the light rail and GreenWay corridor**

The Project Application proposes construction of a storm water retention basin within the publicly owned light rail/GreenWay corridor and a pedestrian bridge to provide access to/from the light rail stop. Use of this section of publicly owned corridor space to manage storm water from the Allied Mills site conflicts with other important future public uses of the corridor space, including open space/landscaping, habitat protection, pedestrian access to the light rail stop and construction of a proposed new section of GreenWay shared use path along the corridor between Longport St. and Old Canterbury Rd. It is not appropriate that use of an area of public land for storm water management should usurp and/or unreasonably impact on other important community uses of the corridor, which will be of direct benefit to site residents, visitors, light rail users and the broader community.

**It is recommended that consent conditions are applied which ensure that:-**

**C3 (i)** Designs for the storm water retention works in the light rail and GreenWay corridor do not prevent other community benefits being realised (in a cost effective manner) in this section of the corridor.

**C3 (ii)** Future construction of the GreenWay shared use path can easily be undertaken along this section of the light rail/GreenWay corridor without being impeded by storm water management works for the Allied Mills site. This should include preparation by the applicant of detailed designs.

**C3 (iii)** Detailed designs for the shared use path, public domain, storm water works and landscaping in the corridor are undertaken in close consultation with relevant state agency and council staff.

**C3 (iv)** The applicant is responsible for making a reasonable contribution towards the cost of designing and constructing the GreenWay shared use path and other elements of community benefit within the light rail/GreenWay corridor adjacent to the site.

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#### **C4 Precinct activation and community connections**

A new hub is being established in the Allied Mills/Lewisham Estate precinct, with the light rail stop/GreenWay corridor at its centre. Successful patronage of the light rail and use of the GreenWay for cycling and walking will depend, to a significant extent, on the extent to which pedestrians and cyclists feel comfortable and safe moving through the site during the day and at night. This can be achieved through design excellence (as outlined in C1 above) and appropriate activation of the publicly accessible areas within the precinct and the approaches to the precinct from surrounding residential areas. Appropriate activation will directly benefit property owners, residents and visitors to the site.

#### **It is recommended that:-**

**C4 (i)** Place making/management approaches are developed by the applicant in close consultation with relevant state agency and council staff to appropriately activate pedestrian access ways to the site and to activate publicly accessible areas within the site in the short to long term. The objective should be to create and maintain a vibrant, attractive, inclusive urban environment which minimises conflict and facilitates public access, positive social interaction, community connections and a healthy, active lifestyle for residents and visitors to the site (of all ages).

**C4 (ii)** Appropriate consent conditions are required to ensure that the applicant makes a reasonable contribution towards the cost of establishing and maintaining an activated, safe and attractive urban environment within and in the immediate vicinity of the site.

**C4 (iii)** Appropriate consent conditions are required to ensure that the applicant consults closely with relevant state agency and council staff regarding the architecture, public access and public domain designs for proposed retail/community buildings on site, in particular the 2 storey building occupying portion 5, adjacent to the light rail/GreenWay corridor.

#### **C5 Best practice sustainability**

As mentioned in section A above, the development site has the potential to be a high quality and sophisticated model for sustainable, 21<sup>st</sup> century living. It has excellent potential to reduce car dependency and increase walking and cycling (and associated fitness, community connections and general community well-being) because of its proximity to light rail, heavy rail, the GreenWay and the urban villages of Summer Hill and Leichhardt.

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The development can also model best practice ESD in respect of energy, water and waste management, biodiversity, native habitat rehabilitation etc.

**It is recommended that consent conditions are applied which:-**

**C5 (i)** Require the use of indigenous plant species for landscaping throughout the subject site, with species to be referenced from the GreenWay Revegetation and Bushcare Plan (2012)

**C5 (ii)** Take account of relevant guidelines in the GreenWay Biodiversity Strategy (2012) eg in relation to bio-links, weeds and threatened species (particularly bandicoots).

**C5 (iii)** Achieve best practice sustainability performance in buildings on site, including (but not limited to):-

- energy conservation and efficiency eg co-generation, solar generation;
- potable water conservation and efficiency;
- waste water management and potential recycling;
- storm water management best practice (see also C3 re: water sensitive urban design);
- effective management of embodied carbon;
- waste reduction and management eg recycling, composting.

**C5 (iv)** Achieve best practice sustainability in common areas across the site, for example through the provision of:-

- car pooling opportunities and other measures to reduce car dependency;
- best practice cycling facilities for all site users eg shoppers, workers, residents;
- community gardening spaces and/or roof gardens within the site;
- best practice measures to evaluate sustainability performance at a precinct scale.

**D Relevant documents and guidelines**

A number of strategic documents have been prepared by councils and other GreenWay stakeholders which outline the importance of enhancing community well-being and striving to achieve safe, activated, connected communities in the vicinity of the light rail/GreenWay corridor. The documents also contain practical suggestions about how this might be achieved through an integrated, place-based approach which can be applied to the Allied Mills/light rail/Lewisham Estate precinct and the approaches to it. The documents include:-

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- council strategic plans eg “Our Place, Our Vision” – Marrickville Community Strategic Plan 2021; Ashfield 2022 “Our Place, Our Future” – Ashfield Community Strategic Plan
- issues specific council strategies eg Marrickville Council precinct plans, public art strategies
- GreenWay Biodiversity Strategy 2013
- GreenWay Active Transport Strategy and Action Plan (2012)
- GreenWay Interpretive Signage Strategy (2012)
- GreenWay Revegetation and Bushcare Plan (2012)
- Draft Design Principles for Major Development Fronting the GreenWay (2011)
- Interim GreenWay Arts and Community Culture Strategy (2011)

Additional strategies and guidelines are currently being prepared by Ashfield and Marrickville Councils, the GreenWay Program and TfNSW relating to issues of direct relevance to the Allied Mills/Lewisham West development precinct eg public art, way finding and signage, public domain design, community culture, youth.

**It is recommended that:-**

**D (i)** Agreed mechanisms be put in place by the applicant and relevant state agency and council staff to ensure that the stage 1 Project Application takes account of (and preferably embraces) the above documents and guidelines (including relevant guidelines under development or in draft form).

Thank you for the opportunity to provide comments on the Stage 1 Project Application for the Allied Mills site.

Yours sincerely

**Nick Chapman**  
**GreenWay Place Manager**

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## **Summary of recommended consent conditions**

### **C 1 Public access way to light rail, GreenWay and Lewisham Estate**

**C 1 (i)** A consent condition is required which reflects the Concept Plan conditions 23 to 26 to achieve the open space and public access way requirements leading from Smith St to the light rail stop. This could be achieved through relevant notation on land title to avoid inappropriate modifications in the future.

**C1 (ii)** The width of the above public access way should be a minimum of 8ms, as per the applicant's landscape and site plan drawings, not 3ms as shown on the stage 1 Project Application diagram.

**C1 (iii)** The public access way should be under the control, maintenance (and preferably ownership) of the two councils (also taking into account the small section within Marrickville LGA immediately to the south of the Canal).

**C1 (iv)** The detailed design of the above public access way should reflect best practice open space design principles - see recommendation C2(i) below. Detailed designs should be developed in close consultation with relevant state agency and council staff and in accordance with relevant design guidelines - see also recommendation D(i).

### **C2 Design excellence – recommended consent conditions**

**C2 (i)** Appropriate conditions of consent should be applied to ensure design excellence in all its forms, including built form, adaptive re-use, water sensitive urban design (particularly in the areas referred to in C1 and C3), public art, street furniture and finishes, space activation (particularly adjacent to retail and commercial areas and the light rail/GreenWay corridor), lighting, signage, open space design etc to maximize pedestrian comfort and safety during the day and at night.

**C2 (ii)** The applicant should be required to work in close consultation with relevant state agency and council staff during concept and detailed design development and implementation. This includes appropriate consideration of on-going public domain management and maintenance issues/costs - see also recommendation C4 (ii). Designs should reflect relevant design guidelines - see recommendation D(i).

### **C3 Works in the light rail and GreenWay corridor – recommended consent conditions**

**C3 (i)** Designs for the storm water retention works in the light rail/GreenWay corridor should not prevent other community benefits being realised (in a cost effective manner) in this section of the corridor.

**C3 (ii)** Appropriate provision should be made to ensure that future construction of the GreenWay shared use path can easily be undertaken along this section of the light

rail/GreenWay for the Allied Mills site. This should include preparation by the applicant of detailed designs.

**C3 (iii)** Detailed designs for the shared use path, public domain, storm water works and landscaping in the corridor should be undertaken by the applicant in close consultation with relevant state agency and council representatives.

**C3 (iv)** The applicant should be responsible for making a reasonable contribution towards the cost of designing and constructing the GreenWay shared use path and other elements of community benefit within the light rail/GreenWay corridor adjacent to the site.

#### **C4 Precinct activation and community connections – recommended consent conditions**

**C4 (i)** Place making/management approaches should be developed by the applicant in close consultation with relevant state agency and council staff to appropriately activate pedestrian access ways to the site and to activate publicly accessible areas within the site in the short to long term. The objective should be to create and maintain a vibrant, attractive, inclusive urban environment which minimises conflict and facilitates public access, positive social interaction, community connections and a healthy, active lifestyle for residents and visitors to the site (of all ages).

**C4 (ii)** Appropriate consent conditions are required to ensure that the applicant makes a reasonable contribution towards the cost of establishing and maintaining an activated, safe and attractive urban environment within and in the immediate vicinity of the site.

**C4 (iii)** Appropriate consent conditions are required to ensure that the applicant consults closely with relevant state agency and council staff regarding the architecture, public access and public domain designs for proposed retail/community buildings on site, in particular the 2 storey building occupying portion 5, adjacent to the light rail/GreenWay corridor.

#### **C5 Best practice sustainability – recommended consent conditions**

**C5 (i)** The applicant should be required to use indigenous plant species for landscaping throughout the site, with species to be referenced from the GreenWay Revegetation and Bushcare Plan (2012).

**C5 (ii)** The applicant should take account of relevant guidelines in the GreenWay Biodiversity Strategy (2012) eg in relation to bio-links, weeds and threatened species (particularly bandicoots).

**C5 (iii)** The applicant should be required to achieve best practice sustainability performance in buildings on site, including (but not limited to):-

- Best practice energy conservation and efficiency eg co-generation, solar generation;
- potable water conservation and efficiency;
- waste water management and potential recycling;
- storm water management best practice - see also C2 (i) water sensitive urban design;
- effective management of embodied carbon;
- waste reduction and management eg recycling, composting.

**C5 (iv)** The applicant should be required to adopt best practice sustainability approaches in common areas across the site, for example through the provision of:-

- car pooling opportunities and other measures to reduce car dependency;
- best practice cycling facilities for all site users eg shoppers, workers and residents;
- community gardening spaces and/or roof gardens within the site;
- best practice measures to evaluate sustainability performance at a precinct scale.

#### **D Relevant documents and guidelines**

**D (i)** Agreed mechanisms should be put in place by the applicant and relevant state agency and council staff to ensure that the stage 1 Project Application takes account of (and preferably embraces) the strategy documents and guidelines listed in Section D (including relevant guidelines under development or in draft form).