

Planning Services

Gateway Determination Report

LGA	Inner West
RPA	Inner West Council
NAME	Planning proposal to amend Marrickville LEP 2011 to rezone 67, 73-83 Mary, 50-52 Edith and 43 Roberts Street, St Peters from R2 Low Density Residential and IN2 Light Industrial to B4 Mixed Use and amend the development standards (180 dwellings and 320 jobs)
NUMBER	PP_2017_IWEST_010_00
LEP TO BE AMENDED	Marrickville Local Environmental Plan 2011 (MLEP 2011)
ADDRESS	67, 73-83 Mary, 50-52 Edith Street and 43 Roberts Street, St Peters
DESCRIPTION	Lot 1 DP556914, Lot 13 DP660883, Lot 1 DP952133, Lot 1 DP180958, Lot 1 DP745014, Lot 1 DP745657, Lot A DP331215 and Lot 1 DP87885
RECEIVED	15/08/17
FILE NO.	16/05392
QA NUMBER	qA417239
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal

INTRODUCTION

Description of Planning Proposal

The planning proposal seeks to amend the Marrickville Local Environmental Plan 2011 (Marrickville LEP 2011) as follows:

- rezone the site from IN2 Light Industrial and R2 Low Density Residential to B4 Mixed Use, except for 43 Roberts Street which is to be rezoned from R2 Low Density Residential to RE1 Public Recreation;
- introduce a maximum building height at 73-83 Mary from zero to varying heights of 17m, 20m, 23m and 29m across the site;
- amend the maximum building height at 50-52 Edith Street from 9.5m to 17m and 20m; and
- amend the Floor Space Ratio (FSR) over the site from part 0.95:1 and part 0.65:1 to 2.2:1 except for land at 43 Roberts Street which remains 0.6:1.

The proposal will facilitate the redevelopment of the site for a mixed use development, with buildings ranging in height from 3 to 7 storeys, which would result in approximately 180 new residential apartments and 320 new jobs. The proposal will also provide a 230 sqm neighbourhood centre and public domain enhancements, including 600 sqm of open space, pedestrian/cycling links via Roberts Street and public art works.

Site Description

The site has an area of 1.5ha and is located within a block comprising predominantly residential terrace developments. The block is bound by Unwins Bridge Road to the north and the Princes Highway to the south. The site is in the Sydenham Precinct of the draft Sydenham to Bankstown Urban Renewal Corridor Strategy, which is recognised in the draft Central District Plan.

The site currently has 11 industrial buildings, 1 cottage and 3 residential dwellings (for a total of 15 buildings) on the subject site, ranging in height from 1 to 3 storeys. The industrial buildings are used for a variety of light industrial uses, some of which include a micro-brewery, florist and a furniture supplier. A large car park is located at the north-eastern corner of the site, which can accommodate approximately 80 cars.

The zoning under Marrickville LEP 2011 is IN2 Light Industrial for 75 Mary Street, with the remaining lots zoned R2 Low Density Residential (Figure 2).

Surrounding Area

The site is approximately 600 metres from Sydenham train station, the proposed Sydenham metro station to be built as part of the Sydney Metro project, and one kilometre from St Peters station. The Sydney CBD is approximately five kilometres north-east of the site and Sydney Airport is located one kilometre to the south. To the north across Unwins Bridge Road, there is a large contiguous strip of IN1 General Industrial and IN2 Light Industrial zoned land.

The site is in a predominantly R2 Low Density Residential zoned area along Mary, Robert and Edith Street, characterised by one and two storey development, except for 60 and 62 Mary Street to the south, which industrial zoned with a mix of one to three storey buildings.

Summary of Recommendation

The planning proposal is supported to proceed, as it:

- involves a small pocket of non-strategic industrial land and will have minimal effect on the supply of employment lands within the local government area (LGA);
- will provide for more intensive employment on site through permitted creative industries and other commercial activity; and
- will provide additional housing in a predominantly residential area with good public transport and proximity to local facilities and services.

Council has been consulted about the proposed RE1 Public Recreation zoning of 43 Robert Street and has indicated that it does not intend to purchase or manage the land. It is recommended that an alternative zoning for this part of the site be investigated.

The proposal is consistent with all relevant State and local environmental planning instruments, strategies, plans and policies, and will not result in any adverse environmental or amenity impacts on the site or neighbouring land.



Figure 1: Site Map (source SIX Maps)

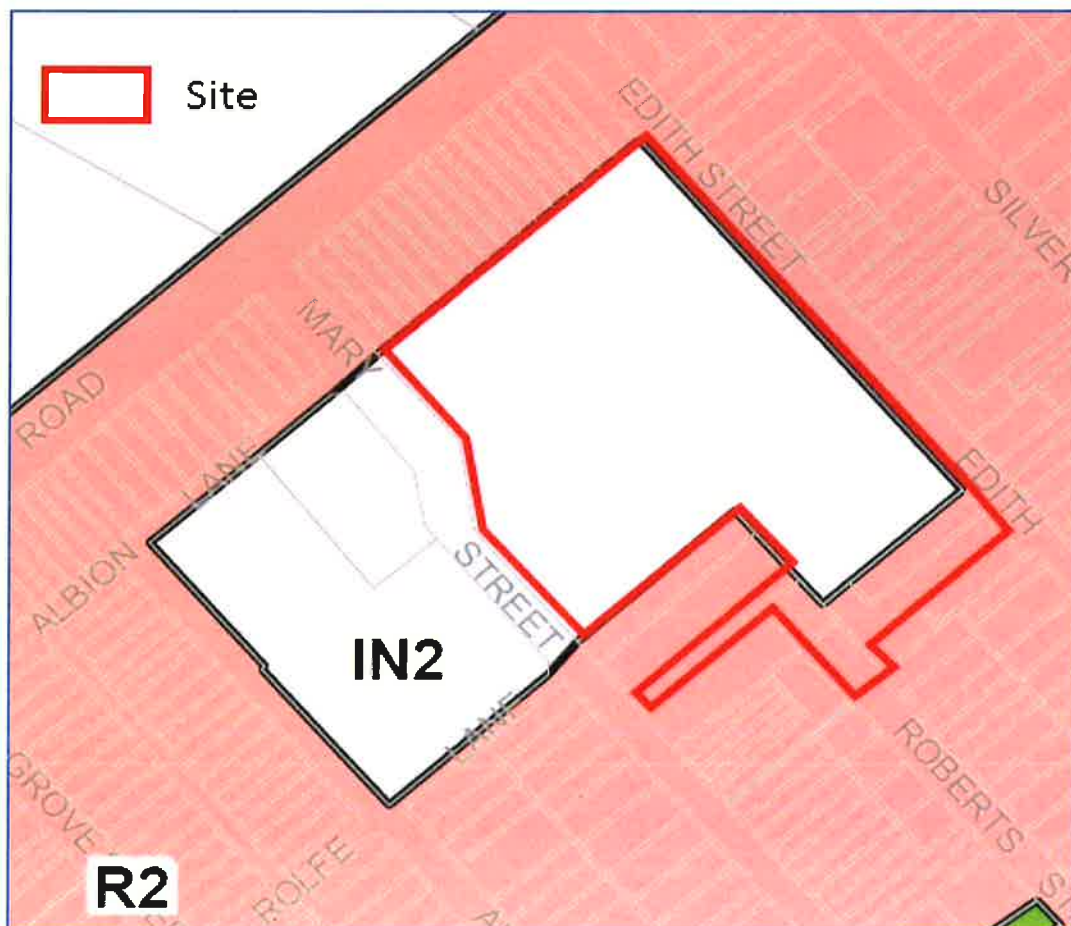


Figure 2: Zoning Map (source Marrickville LEP)

PROPOSAL

Objectives or Intended Outcomes

The objective of the planning proposal is to facilitate a mixed-use development on the site. The intended outcome of the proposal is to enhance the existing employment generating, creative use precinct by upgrading the facilities and integrating the use into the surrounding area.

The objective of the proposal is considered clear and does not require amendment prior to community consultation.

Explanation of Provisions

The following amendments are proposed to Marrickville LEP 2011:

- rezone the site from IN2 Light Industrial and R2 Low Density Residential to B4 Mixed Use, except for 43 Roberts Street which is to be rezoned from R2 Low Density Residential to RE1 Public Recreation;
- introduce a maximum building height at 73-83 Mary from zero to varying heights of 17m, 20m, 23m and 29m across the site;
- amend the maximum building height at 50-52 Edith Street from 9.5m to 17m and 20m; and
- amend the FSR over the site from part 0.95:1 and part 0.65:1 to 2.2:1 except for land at 43 Roberts Street which remains 0.6:1.

The proposal also seeks to introduce a flexible provision, enabling variation of different mapped height limits by up to 1m horizontally, into Schedule 1 of Marrickville LEP 2011.

The explanation of provisions is considered clear and does not require amendment prior to community consultation.

Mapping

The planning proposal contains maps which adequately show the current and proposed controls. These maps are considered adequate for public exhibition purposes.

NEED FOR THE PLANNING PROPOSAL

The planning proposal was the subject of a Pre-Gateway review which was initiated after Council resolved not to support the planning proposal.

Council received the planning proposal for the site on 30 September 2015. On 3 February 2016, Council considered a planning report and resolved to defer it pending community consultation. On 15 March 2016, Council considered the proposal again and resolved to refuse the proposal. On 21 March 2016, the Department of Planning and Environment receive a request for a Pre-Gateway Review. On 9 September 2016, the proposal was forwarded to the Sydney East Joint Regional Planning Panel (the Panel) for review.

On 6 October 2016, the Panel decided the proposal demonstrated both strategic and site specific merit, but deferred its decision pending receipt and consideration of additional information.

On 15 February 2017, the Sydney Central Planning Panel held a second briefing to consider the proponent's additional material and unanimously recommended the planning proposal should be submitted for a Gateway determination. In making its determination, the Panel considered that:

- the proposal satisfies the precautionary principle for rezoning industrial land as stated in the draft Central District Plan, because the site is an isolated piece of industrial land and the amount of floor space devoted to employment will be greater following the proposed rezoning than it is now;
- two studies undertaken by the former Marrickville Council (Marrickville Urban Strategy 2007 and the Marrickville Employment Lands Study 2015), supported the conversion of this type of isolated industrial site to alternative use; and
- the proposed heights and floor space ratio are considered appropriate for exhibition, noting the detailed proposal has been endorsed by the Council's Architectural Excellence Panel.

The Panel also recommended that the planning proposal be updated to:

- provide a statement of intent that a flexible provision enabling variation of mapped height limits by up to 1m horizontally be introduced instead of using clause 4.6 of MLEP 2011; and
- demonstrate consistency with the draft Central District Plan.

The proposal responds to these Panel recommendations.

The planning proposal is required to amend the zoning, height and floor space ratios that apply to the site and is the best means to achieve the intended outcome of redeveloping the site for a mixed use development. The proposal increases the development potential of the site, providing the capacity to provide additional employment opportunities whilst also facilitating the delivery of residential dwellings.

It is considered the proposal is justified and the best way to achieve the intended outcomes.

STRATEGIC ASSESSMENT

State Plans

A Plan for Growing Sydney

The subject land is located within the Central Subregion and is identified in the Urban Renewal Corridor along the Bankstown Railway Line and the Global Economic Corridor. This corridor has been identified for concentrated employment, economic activity and related uses.

The Department considers the proposal to be consistent with the relevant Directions of the Plan, as follows:

- **Direction 1.6 - Expand the Global Economic Corridor:** Although the proposal would reduce the industrial activity on the site, it would encourage renewed employment generating, creative uses on the site in a predominantly residential area.
- **Direction 1.7 - Grow strategic centres, providing more jobs closer to home:** The proposal seeks efficient redevelopment of the land, increasing its mixed use potential for generating jobs and housing.
- **Direction 1.9 – Support priority economic sectors:** The Department has carried out an assessment of the proposal against the Industrial Lands Strategic Assessment Checklist, which is discussed further below. This assessment concluded that there is sufficient strategic merit to support the proposal progressing.
- **Direction 2.1 - Accelerate housing supply:** The proposal will provide increased capacity for residential dwellings, increasing housing supply, options and affordability on a site close to public transport and nearby services.

- Direction 2.2 - Accelerate urban renewal: The site is suitable for renewal given its location adjoining primarily residential development, and proximity to public transport and to nearby services.
- Direction 2.3 - Improve housing choice: The proposal will provide medium density housing in new and refurbished buildings.
- Direction 3.3 - Create healthy built environments: The site is close to public transport and provides opportunities for active travel, including walking and cycling, linked to open space. 45 Robert Street is proposed to be rezoned RE1 Public Recreation to provide public open space.

The Department's assessment of the proposal against the Industrial Lands Strategic Assessment Checklist concluded there is sufficient strategic merit to progress the rezoning, as follows:

- the site is isolated from the strategically significant Sydenham/Marrickville industrial lands;
- the Marrickville Urban Strategy (2007) and Marrickville Employment Lands Study (2015) both support the rezoning of fragmented/peripheral industrial lands to B4 Mixed use and other alternative employment uses;
- the rezoning would not significantly impact on the LGA's stock of industrial land (being less than 1% of the total industrial zoned land and being isolated from large contiguous parcels of industrial land);
- despite reducing the amount of land available for industrial uses, by adding commercial activity to the current permitted light industrial uses, the proposed B4 Mixed Use zoning is expected to increase employment opportunities at the site, while providing additional housing and amenity benefits to the area; and
- the site is not required for an alternative purpose in any State or council strategies.

It is considered the proposal is consistent with the relevant Directions of *A Plan for Growing Sydney*.

District Plans

Draft District Plan

The draft Central District Plan, released on 21 November 2016, notes that land zoned for employment and urban services supports activities that are central to Sydney's productivity, sustainability and liveability. Employment and urban services are transitioning away from "traditional" industries towards high technology and emerging industries. Despite this change, existing industrial, manufacturing, warehousing and distribution industries are vital in supporting the employment network of the Central district.

The draft Plan suggests a precautionary approach to rezoning employment lands should be taken, with any proposed rezoning to be based on a net community benefit assessment considering a district-wide perspective.

The current proposal is considered to satisfy this precautionary approach, as the amount of floor space devoted to employment uses will not be reduced. The site is an isolated industrial area separated from the strategic industrial land in Marrickville and Sydenham and the rezoning will increase the permitted floor space zoned for employment uses. The proposed amendments being made to the Development Control Plan (DCP) will reinforce the planning proposal by limiting the amount of residential development permitted to a maximum of 50% of the total permissible floor area.

The proposal would facilitate the development of approximately additional 180 apartments in a location that is close to services and would not result in a significant loss of

employment land. The site is located within 1km of major open space, 800m from Marrickville Metro Shopping Centre and is located within an existing residential area.

The proposal is consistent with the draft Plan directions of providing housing with good access to open space, existing services and public transport.

The proposal is therefore considered consistent with the economic actions and priorities of the draft Plan and aligns with the actions to deliver housing in a location with good access to transport and services.

Sydenham to Bankstown Corridor

The draft Sydenham to Bankstown Urban Renewal Corridor Strategy identifies the potential for 35,400 new homes and 8,700 new jobs over the next 20 years and infrastructure to support the future community's needs.

Whilst the site is identified within the Sydenham precinct of this draft Strategy, any zoning recommendations have been deferred pending the outcome of this planning proposal.

The Strategy builds on the Sydney Metro City and Southwest project and provides a co-ordinated approach to infrastructure delivery and development across the corridor.

This Strategy will enhance the station precincts by:

- valuing neighbourhood character;
- renewing town centres;
- providing improved open spaces; and
- providing community services and facilities.

The Sydney Region East team consulted with the Department's Urban Renewal team, which recommended that a satisfactory arrangements provision be included in any Gateway to allow for contributions to designated State public infrastructure identified as part of the draft Strategy.

Local Plans

Marrickville Urban Strategy (2007)

The Marrickville Urban Strategy (MUS) established a vision and co-ordinated directions for a range of planning and related issues to guide strategic planning policies for the former Marrickville LGA in response to the employment and housing targets in the Metropolitan Strategy (2005) and draft South Subregional Strategy over a 10-year period.

It is considered that the planning proposal contributes to the objectives of the MUS by retaining and revitalising existing employment land, whilst also contributing to the housing density targets outlined in the strategy.

Marrickville Employment Lands Study (2015)

The Marrickville Employment Lands Study 2015 reviewed all IN1 General and IN2 Light Industrial land, and updated the original 2008 study. The study's conclusions support the proposal, as it found there is sufficient capacity in the main industrial precincts to accommodate projected demand, and therefore some rezoning of industrial land to other uses would have social and economic benefits.

The study established the following relevant action:

- **Action 4.3:** supports rezoning select residential interface sites to B4 Mixed Use. This specifically relates to industrial land that is peripheral to the significant industrial land precincts, with good nearby public transport. The B4 zone was recommended to ensure existing or future industrial uses can be accommodated.

Section 117(2) Ministerial Directions

The planning proposal is consistent with all applicable S117 Directions except the following:

Direction 1.1 Business and Industrial zones

This Direction aims to encourage employment growth in suitable locations, protect employment land in business and industrial zones, and support the viability of identified strategic centres. It applies to all proposals affecting land within existing and proposed business or industrial zones, which must retain such zonings and related floor space controls. Any inconsistency must be justified by a strategy, study or be of minor significance.

Whilst the proposal has demonstrated inconsistencies with the Direction's objective of protecting current and potential floor space area for industrial uses, this inconsistency is considered to be justifiable. As previously mentioned, the site is fragmented from the industrial zoned sites along Unwins Bridge Road and the wider Sydenham/Marrickville strategic industrial lands. The rezoning of the site, although reducing the amount of industrial zoned land in the LGA, will maintain the area of land zoned for employment use within the LGA.

The proposed B4 Mixed Use zone will permit light industrial and new commercial uses on the site, which allows for more diverse and intensive employment on the site. The proposed amendments being made to the DCP will limit the amount of residential development permitted on site to a maximum of 50% of the total permissible floor area.

The proposed rezoning is also supported by two Council documents, the Marrickville Urban Strategy 2007 (MUS) and Marrickville Employment Lands Study 2015 (MELS), both of which support the conversion of the such sites from industrial to alternative uses.

It is therefore considered the proposal has satisfactorily justified its inconsistency with this Direction.

Direction 3.5 Development near licensed aerodromes

This Direction is relevant as the proposal seeks to rezone land affected by the Australian Noise Exposure Forecast (ANEF) contours of Sydney Airport. The Direction states planning proposals must not rezone land for residential purposes or increase residential densities where the ANEF exceeds 25, and must include a provision ensuring development meets AS 2021:2015 Acoustics—Aircraft Noise Intrusion— Building Siting and Construction (AS 2021) noise level standards for residential development within the 20-25 ANEF contour; and for commercial/industrial purposes, where the ANEF exceeds 30. The majority of the site is within the 20-25 ANEF contour, while a small portion of the north-western corner of site is within the 25-30 ANEF contour (Figure 3).

Any residential development on site will be subject to clause 6.5 of the Marrickville LEP 2011 which requires noise attenuation criteria to be met. These criteria are consistent with AS 2021, for any residential development in the 20-25 ANEF.

The proposal is inconsistent with the Direction in relation to a small portion of land within the 25-30 ANEF on which the proposed B4 zoning would permit residential development.

However, this inconsistency is considered to be justifiable, given the majority of the site is within the 20-25 ANEF contour and the part of the site affected by the 25 – 30 ANEF will have no residential accommodation. This part of the site is still suitable for commercial or industrial uses as the ANEF does not exceed 30, which is consistent with the Direction. Any future development application would be subject to clause 6.5 of Marrickville LEP 2011 and would need to address and satisfy these requirements.

As outlined in the Direction, consultation will be required with the Federal Department of Infrastructure and Regional Development and Sydney Airport Corporation.

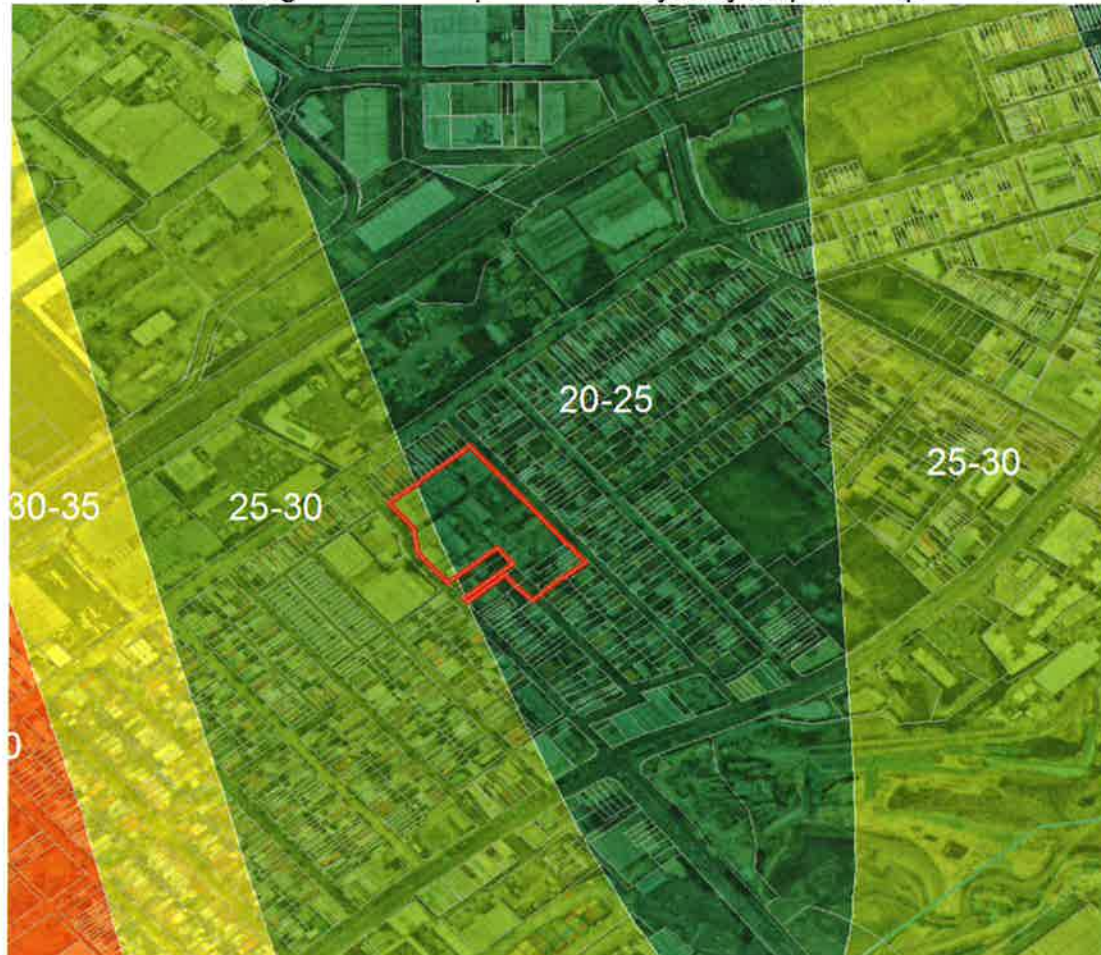


Figure 3: ANEF Contour Map

State Environmental Planning Policies

The planning proposal identifies several State Environmental Planning Policies (SEPPs) applicable to the site. The Department's assessment considers the proposed rezoning is consistent with the identified SEPPs and does not contain any provisions contravening the operation of relevant SEPPs.

SEPP 55 – Remediation of Land

Historically, 75 Mary Street has been used primarily for industrial uses, including a paint manufacturing factory.

An Environmental Site Investigation identified levels of contamination on site, likely to have resulted from past filling and site operations. Soil and groundwater contamination were noted and would require remediation before any redevelopment. The investigation concluded that the conditions of site soil and groundwater would not prevent the site from

being rezoned to allow mixed residential and commercial land use, subject to the development and implementation of:

- an Environmental Management Plan (EMP) for the commercial portion of the site; and
- a Remedial Action Plan (RAP), in accordance with relevant NSW EPA guidelines for the remaining parts of the site, to guide site remediation and validation procedures, and to manage waste for off-site disposal.

As there were a number of data gaps, the investigation was not conclusive in its findings as to whether or not the site is suitable for residential land use and recommended further comprehensive testing to establish its suitability for the proposed uses.

It is recommended that a remedial action plan be prepared prior to community consultation and exhibited concurrently with the planning proposal. Further site investigations may need to be carried out prior to carrying out remediation works. It is also recommended that the Environmental Protection Authority be consulted during community consultation.

SITE SPECIFIC ASSESSMENT

Social

The planning proposal will result in positive social effects for the local area, as it will improve local facilities, employment opportunities and increase housing stock close to public transport and amenities. Further, the proposal will provide greater housing choice as well as improve public domain facilities and the pedestrian interface with the surrounding streets.

Whilst the proposal will increase the number of residents in the local area, this is not considered likely to pose a strain on the existing community and recreation facilities in the area. The proposed development includes a community facility, as well as creative industries that will add to the vibrancy of the locality.

It is considered the proposal has addressed the social impacts of the rezoning.

Environmental

The site is located in an established urban area with no significant vegetation of ecological value located on site. It is agreed that there are no known critical habitats or threatened species, populations or ecological communities or their habitats that will be affected by the proposal.

Economic

The planning proposal will result in positive economic effects for the local area through the generation of local employment opportunities during construction and operation.

The site is located in an established urban area, with access to a range of existing facilities and services. Future development applications will require further investigation of the likely infrastructure services that will be required, however, it is anticipated that the current infrastructure will adequately serve the site.

Proposed Open Space on site

The proposal seeks to rezone land at 43 Roberts Street, St Peters from R2 Low Density Residential to RE1 Public Recreation to create a 600sqm pocket park. Council has been consulted about the land and has indicated that it does not intend to purchase or manage the land.

Given the above, it is recommended that an alternative zoning for the 43 Robert Street site be investigated, being either a B4 Mixed Use for flexibility of location on site or RE2 Private Recreation if this is the preferred location for the open space on site. The proposal should be updated prior to community consultation to include the updated zoning.

Traffic

The site is located between Unwins Bridge Road and the Princes Highway, with Mary Street acting as an access point to either road. Further, Canal Road which is an access road to and from Sydney Airport directly feeds traffic into Mary Street.

The planning proposal is accompanied by a traffic and parking impact assessment. This assessment concludes that the proposal is supportable in terms of its traffic and parking impacts. The assessment made the following recommendations:

- car share vehicles be used to fill the numeric car parking shortfall;
- car parking access be shared between the residential and commercial land uses;
- a management plan be prepared for servicing and waste collection to avoid conflict and to reduce the amount of loading bays required for the entire development; and
- implement changes to the existing kerbside parking in Edith Street.

The proposal notes that any future development application would be required to demonstrate that the access and car parking is suitable for the proposed development and the level of traffic can be accommodated satisfactorily without adversely affecting local intersection performance.

Given Mary Street's role as a traffic access connection between Unwins Bridge Road and the Princes Highway, it is recommended that Roads and Maritime Services and Transport for NSW be consulted as part of the community consultation period.

Urban Design

On 6 October 2016, the Panel decided the proposal demonstrated both strategic and site specific merit, but deferred its decision pending receipt and consideration of additional information. One of the points raised for further consideration was that a draft development control plan (DCP) should be prepared indicating the proposed physical form and the distribution of uses, including which buildings are proposed to be retained.

The proposal has been updated to reflect this consideration. A site specific DCP has been drafted with the following objectives:

- provide for the redevelopment of the site into a mixed use precinct incorporating commercial, community and residential uses;
- ensure that the precinct provides an appropriate mix of land uses by limiting the amount of residential development permitted to a maximum of 50% of the total permissible floor area;
- retain and adaptively re-use select existing buildings to reflect the industrial heritage and character of the site;
- ensure that new buildings are of exceptional design quality;
- ensure that new residential development provides good amenity for residents and does not adversely impact on existing surrounding development;
- ensure that the site is remediated to an acceptable standard to accommodate residential development;
- increase the amount of landscaping and greenery across the site, including deep soil plantings, green roofs and walls and open space areas;

- improve permeability through the site to benefit the wider area;
- provide safe pedestrian and cyclist access through the site to improve local connectivity;
- provide an accessible space for community purposes; and
- accommodate a range of building heights across the site up to 29 metres.

The Department is satisfied that the draft DCP is consistent with and supports the proposed amendment. Council has advised that the draft DCP will be exhibited concurrently with the planning proposal, which satisfies the recommendations of the Panel.

CONSULTATION

Community

The proposal recommends a minimum exhibition period of 28 days. A community consultation period of at least 28 days is considered appropriate.

Agencies

As soil and groundwater contaminants have been identified, consultation with the Environmental Protection Authority is recommended.

As the resulting development will have traffic implications for Mary Street and the wider road network, consultation with Transport for NSW and Roads and Maritime Services is recommended.

Given the potential increase in population, consultation with the Department of Education is recommended.

As required in the S117 Direction 3.5 – Development near Licenced Aerodromes, consultation is required with the Federal Department of Infrastructure and Regional Development and Sydney Airport Corporation.

TIMEFRAME

Whilst a project timeline was submitted with the planning proposal, it is only partially completed and does not offer any anticipated timeframes after October 2017. Given the nature of the planning proposal, a project timeline of 12 months is considered appropriate. The timeline in the proposal will need to be updated prior to community consultation to reflect the timeframe given in the Gateway conditions.

DELEGATION

Delegation of this planning proposal has not been requested by Council. Given the proposal was subject to a Pre-Gateway Review, delegation to finalise the proposal will not be given to Council.

CONCLUSION

The planning proposal is supported to proceed, as it:

- involves a small pocket of non-strategic industrial land and will have minimal effect on the supply of employment lands within the LGA;

- will provide for more intensive employment generation through permitted creative industries and other commercial activity; and
- will provide additional housing in a predominantly residential area with good public transport and proximity to local facilities and services.

The proposal is generally consistent with all relevant State and local environmental planning instruments, strategies, plans and policies, and will not result in any adverse environmental or amenity impacts on the site or neighbouring land.

RECOMMENDATION

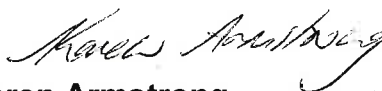
It is recommended that the delegate of the Secretary:

1. Agree any inconsistencies with Section 117 Directions 1.1 Business and Industrial zones and 3.5 Development near licensed aerodromes are justified.

It is recommended that the delegate of the Greater Sydney Commission determine that the planning proposal should proceed, subject to the following conditions:

1. Prior to community consultation the planning proposal is to be updated to:
 - a) include a satisfactory arrangements provision for contributions to designated State public infrastructure identified as part of a draft or final Sydenham to Bankstown Urban Renewal Corridor Strategy;
 - b) identify an alternative zoning for the 43 Robert Street site, being either a B4 Mixed Use or RE2 Private Recreation zoning;
 - c) include a remedial action plan to guide site remediation and validation procedures, and to manage waste for any required off-site disposal; and
 - d) update the project timeline.
2. The planning proposal should be made available for community consultation for a minimum of **28 days**.
3. Consultation is required with the following public authorities and organisations:
 - Environmental Protection Authority;
 - Federal Department of Infrastructure and Regional Development;
 - Sydney Airport Corporation;
 - Roads and Maritime Services;
 - Transport for NSW; and
 - Department of Education.
4. The timeframe for completing the LEP is to be 12 months from the date of the Gateway determination.


 3/10/2017
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