

469-483 Balmain Road, Lilyfield

Submission to PP_2017_IWEST_018_00



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1.0 Introduction

1.1 Purpose

This submission has been prepared by ae design partnership in response to the planning proposal (PP_2017_IWEST_018_00) for 469-483 Balmain Road, Lilyfield (**the site**).

This submission identifies urban design issues with the proposed development including:

- Precedence examples
- Transition potential
- Urban structure
- Built form
- Streetscape compatibility
- Open space
- Solar access & overshadowing
- Proposed LEP amendments

Due to the aforementioned reasons which are discussed in detail throughout this report, particularly the excessive bulk and scale we object this Planning Proposal.

All information regarding the proposal is taken from the urban design report (**the report**) produced by Roberts Day.

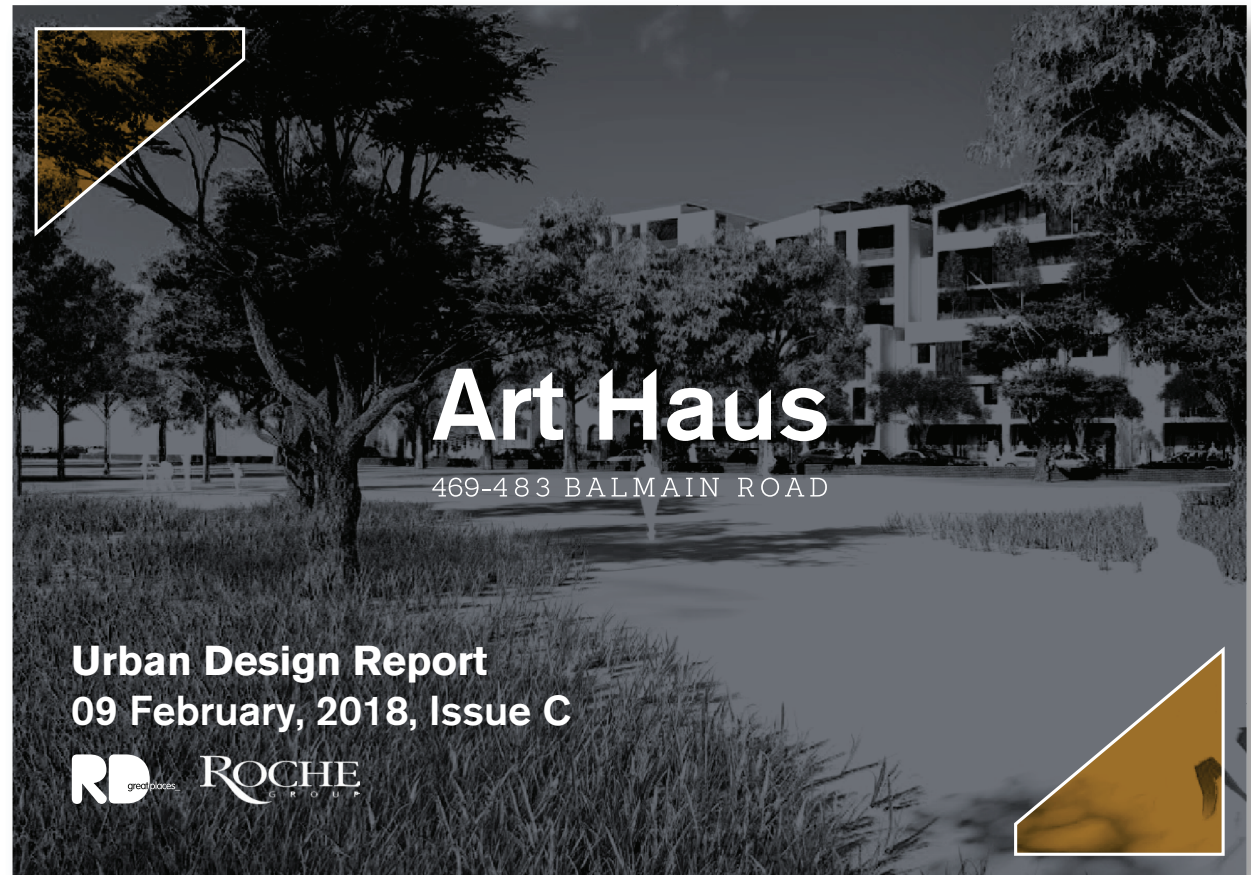


Figure 1: Planning Proposal Urban Design Report Tittle Page

2.0 Issues

2.1 Precedents

The urban design report provides a number of case study precedents located within Australia and overseas. Yet there is no justification as to why these precedent examples have been selected by Roberts Day.

Our review indicates there may be some relevance regarding the types and mix of building uses. However, there is no justification in support of the scale of the proposed built form.

As demonstrated by the aerals to the right (**Figures 2-5**), the examples selected are located in medium to high density areas which are appropriate locations for large built forms, not low density areas such as Lilyfield (**Figure 6**).



Figure 6: 469-483 Balmain Road, Lilyfield Context

469-483 Balmain Road, Lilyfield

- Predominately surrounded by low density housing with small building footprints.



Figure 2: East Village, Victoria Park Context

East Village, Victoria Park

- Located on the perimeter of a new medium to high density housing precinct.
- Separated from low scale houses to the east by 50m wide road.



Figure 4: O'Connell Street, North Melbourne Context

O'Connell Street, North Melbourne

- Located in an historically industrial area characterised by medium density built forms.

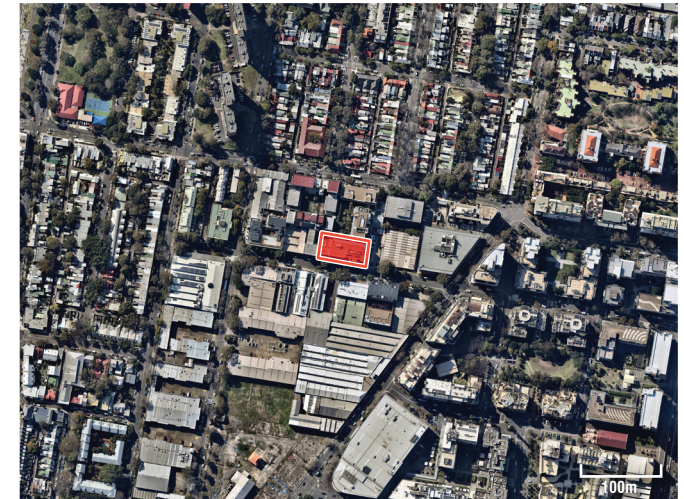


Figure 3: Casba, Waterloo Context

Casba, Waterloo

- Located in an historically industrial area characterised by medium density built forms.



Figure 5: Chophouse Row, Seattle

Chophouse Row, Seattle

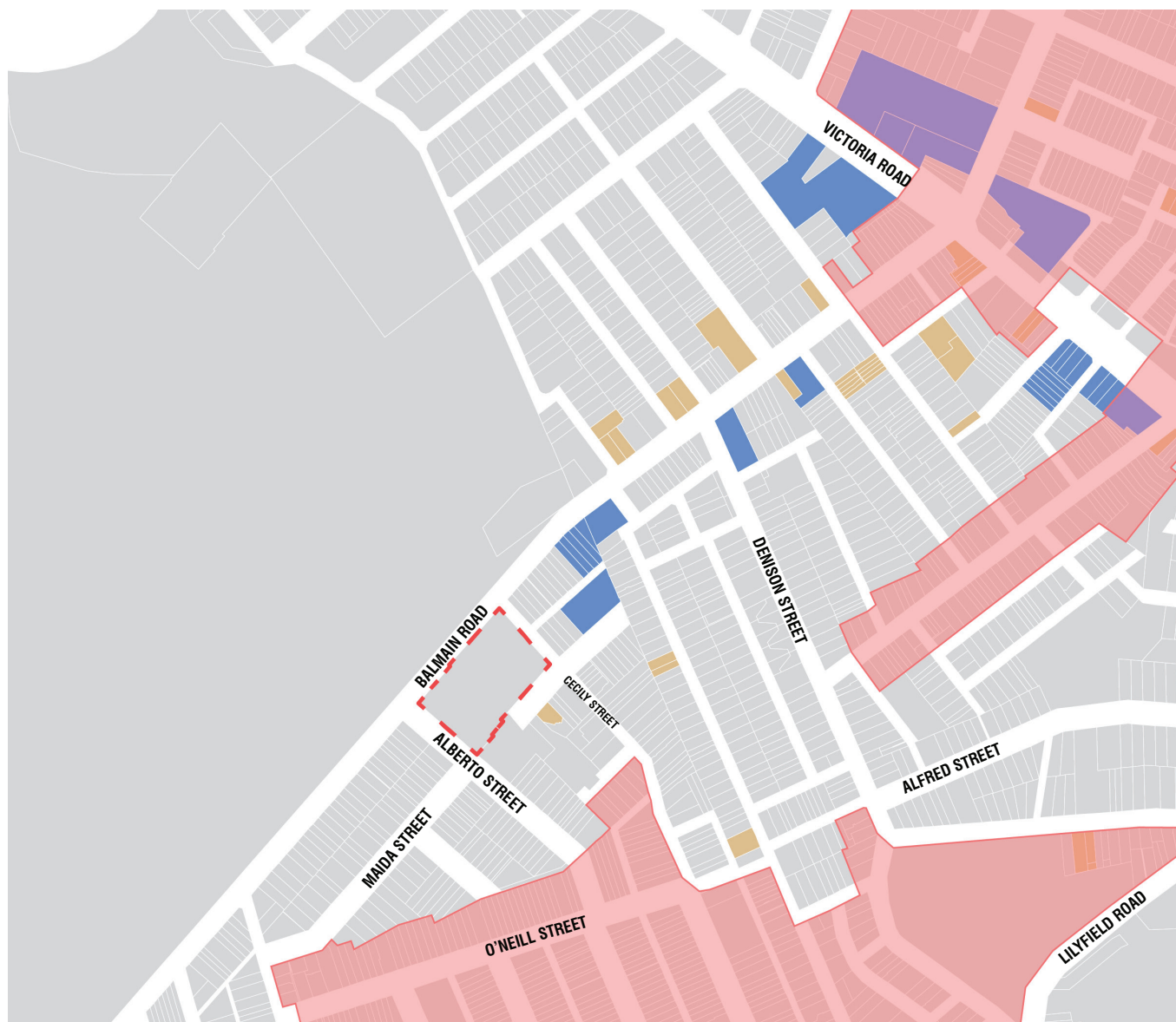
- Located on the periphery of the city centre.
- Surrounded by medium to high density buildings.

2.2 Transition Potential

The propensity for the locality to transition to higher densities similar to those indicated in the studies offered by Roberts Day is unlikely due to:

- the predominant single ownership of properties in the surrounding area;
- heritage items ; and
- heritage conservation areas in the vicinity of the site.

Larger sites with potential for amalgamation highlighted in blue currently exist to the north-east of the site. The likelihood of amalgamations within this area, achieving heights of 6 stories as proposed by Roberts Day is improbable.



LEGEND

Figure 7: Ownership pattern and heritage

- Site boundary
- Large lots
- Heritage items
- Heritage conservation area

2.3 Movement & Urban Structure

Existing Movement & Urban Structure

- The lot size of the site is very large with a length of approximately 108m and the width of approximately 67m.
- Analysis of the surrounding block pattern suggests there is potential to improve the permeability of the site.

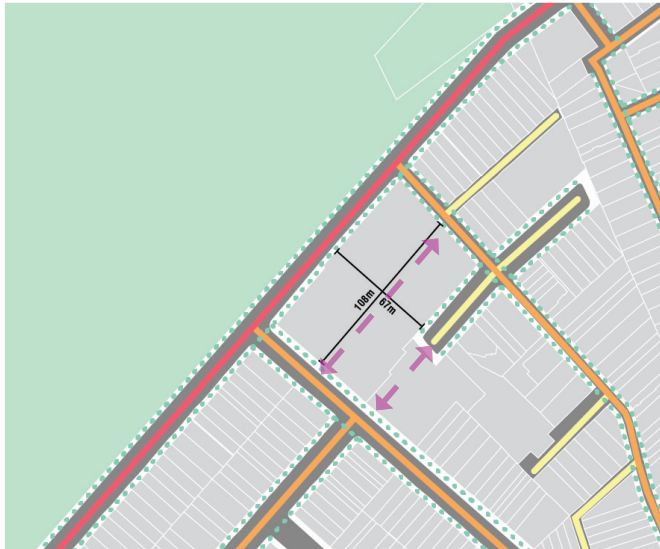


Figure 8: Existing Urban Block

Proposed Movement & Urban Structure

The proposed scheme only improves the permeability of the site by:

- widening the existing footpaths; and
- providing a pedestrian link between Fred Street and Alberto Street.

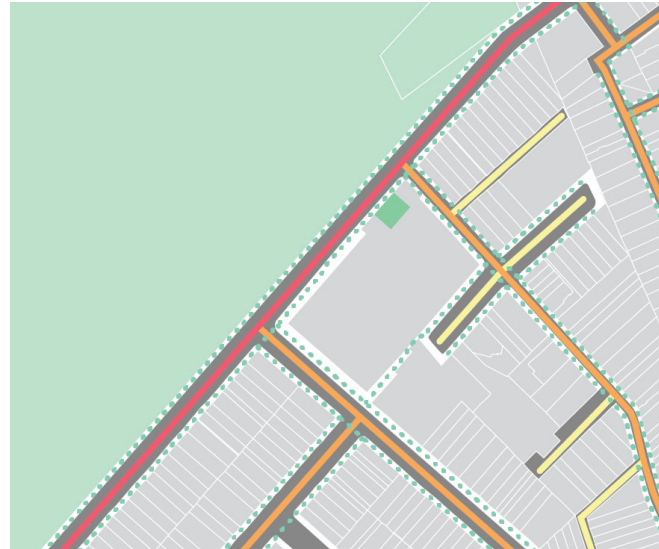


Figure 9: Proposed Urban Block Concept (adapted from Roberts Day UDR) pg.66)

Desired Movement & Urban Structure

The desired urban block has the potential to improve the permeability of the locality by:

- continuing Fred Lane through to Alberto Street;
- providing a pedestrian link from Balmain Road to Fred Street.

This would result in four potential parcels which could be developed upon.

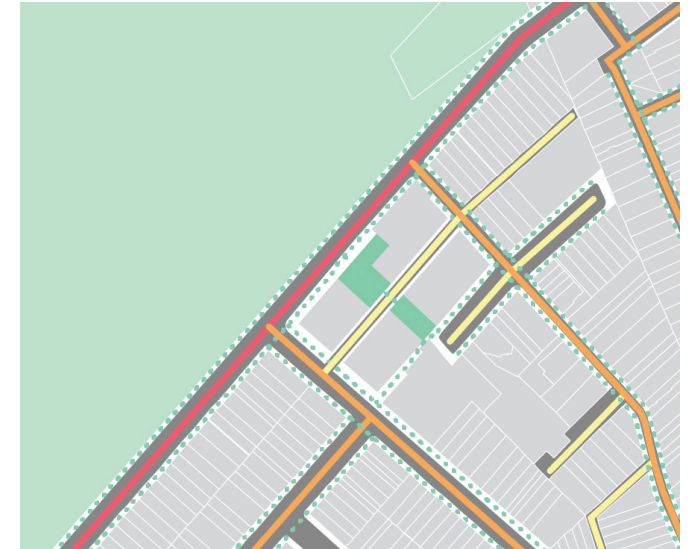


Figure 10: Preferred Urban Block Outcome

LEGEND

- Collector Road
- Local Street
- Secondary Access Street
- Pedestrian Movement
- Open Space
- Potential Road Links

2.2 Built Form

Existing Built Form

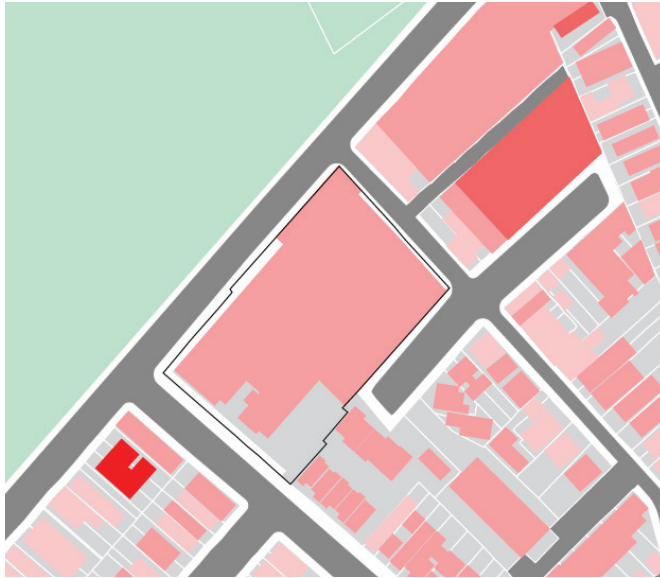


Figure 11: Existing Built Form

Proposed Built Form

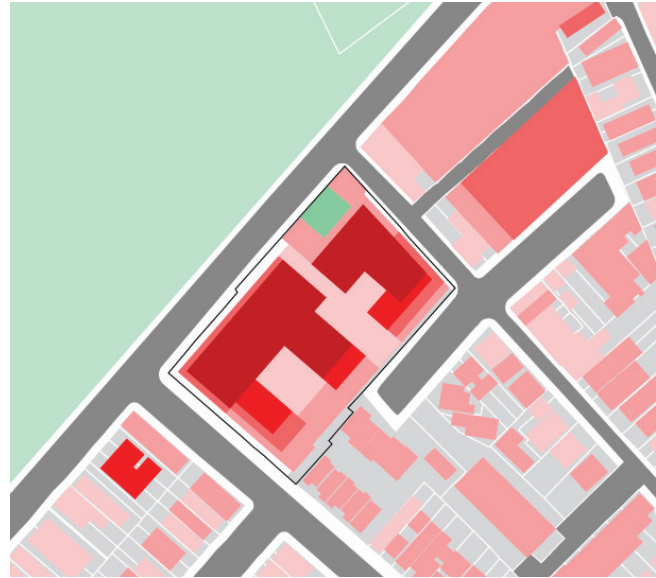


Figure 12: Proposed Built Form Concept
(adapted from Roberts Day UDR)

Desired Built Form

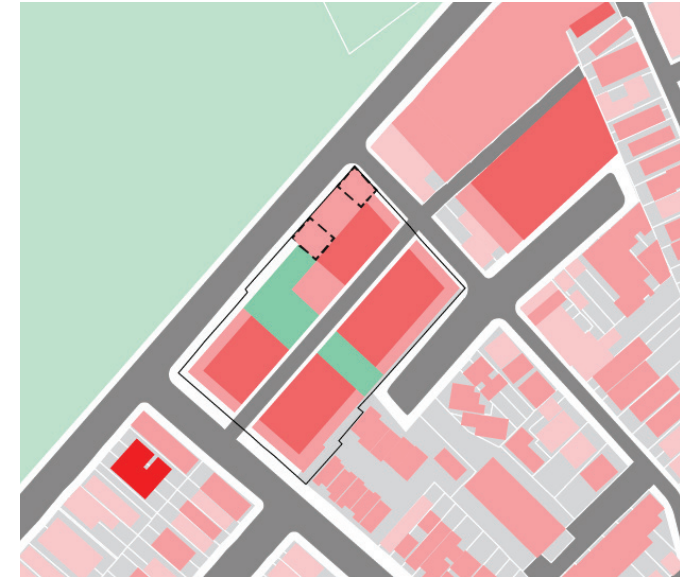


Figure 13: Preferred Built Form Outcome

LEGEND

	Site boundary
	Character buildings
	1 storey
	2 storeys
	3 storeys
	4 storeys
	6 storeys
	Open Space

The proposed scheme is not compatible with the existing built form of the locality as:

- it proposes a building footprint which is far too large for a mixed-use development;
- proposes a range of heights far higher than the existing height of buildings; and
- presents a chest of drawer building typology.

The preferred built form presents a better outcome for the site in terms of form, scale and compatibility with the existing neighbourhood character as it:

- provides an overall building height consistent with other buildings in the vicinity of the site;
- presents a two storey street wall height which is compatible with the existing streetscape;
- provides significant setbacks for the third storey ensuring it is not visible from the pedestrian perspective;
- provides open space along the ground plane ensuring it is easily accessible and of high amenity;
- improves the vehicular and pedestrian permeability of the locality; and
- retains the existing character buildings of the site.

2.4 Streetscape Compatibility

The height of the proposal has no consideration for the existing height of buildings surrounding the site.

Existing Streetscape

The existing Balmain Road streetscape is characteristic of:

- 1-2 storey residential and commercial buildings.
- Streetwall heights ranging from approximately 5-11m
- Mixture of flat and pitched roofs

Existing Balmain Road Streetscape

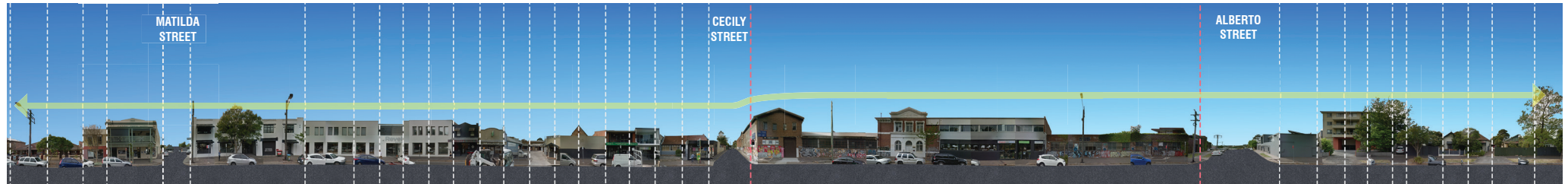


Figure 14: Existing Balmain Road Streetscape

Proposed Balmain Road Streetscape



Figure 15: Proposed Balmain Road Streetscape

Preferred Outcome Balmain Road Streetscape

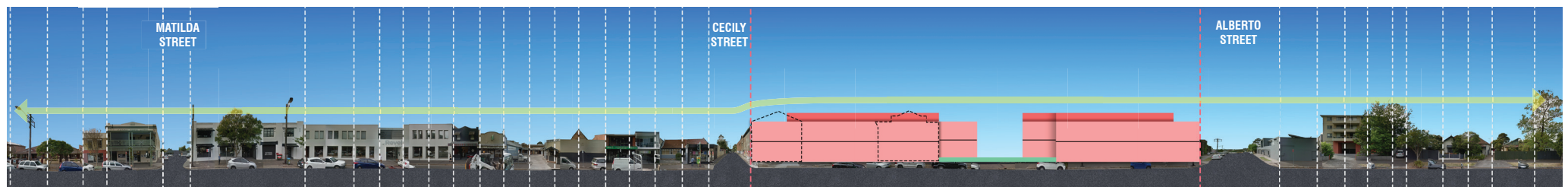


Figure 16: Preferred Outcome Balmain Road Streetscape

Proposed Streetscape

The proposed 6 storey building has a maximum height of 23m which is double the tallest existing buildings along Balmain Road. This height is completely out of character with the locality.

Under no circumstances would a streetwall height higher than the existing street wall height be acceptable. If additional levels are proposed they should be well setback as to not be visible from the pedestrian perspective.

Preferred Outcome

The preferred outcome shown in **Figure 13** presents a two storey streetwall along Balmain Road with a third storey well setback from the street. This presents a much better built form outcome which is compatible with the existing streetscape and local character.

Existing Streetscape

The existing Alberto Street streetscape is characteristic of:

- 1-2 storey terraces and free standing dwellings.
- Pitched roofs
- 2-3m front setbacks

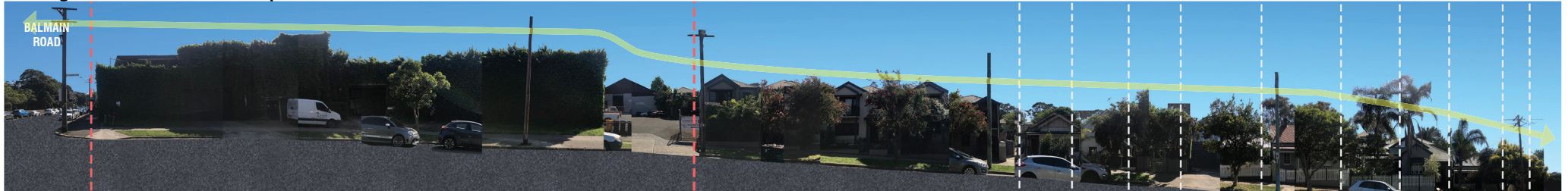
Proposed Streetscape

While the proposed two storey street wall height is supported, the upper levels will be visible from the pedestrian perspective presenting a built form that is completely out of character with the existing streetscape.

Further to this, the proposed stepping down of levels to the rear of the site presents an awkward serrated form creating a ziggurat appearance which is an undesirable built form according to the design guidance in Objective 3F-1 of the ADG which states that:

'Generally one step in the built form as the height increases due to building separations is desirable. Additional steps should be careful not to cause a 'ziggurat' appearance.'

Existing Alberto Street Streetscape



Proposed Alberto Street Streetscape

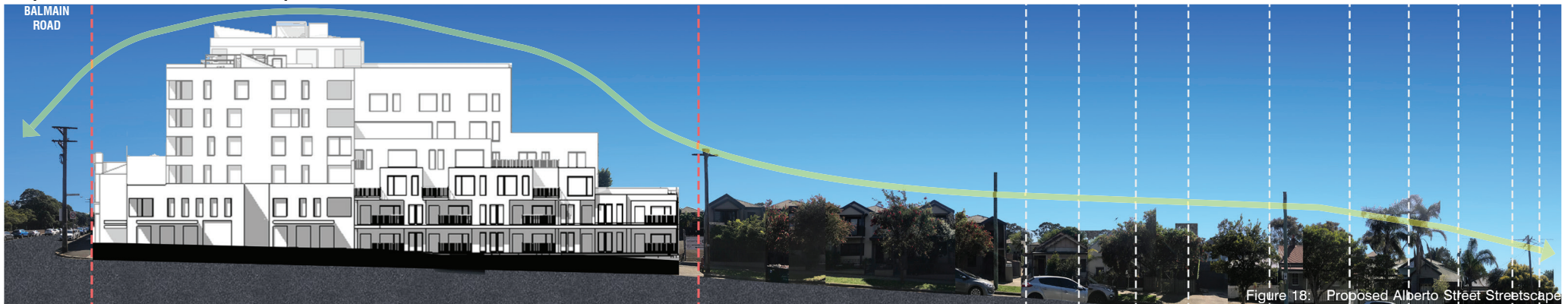


Figure 18: Proposed Alberto Street Streetscape

Preferred Outcome Alberto Street Streetscape

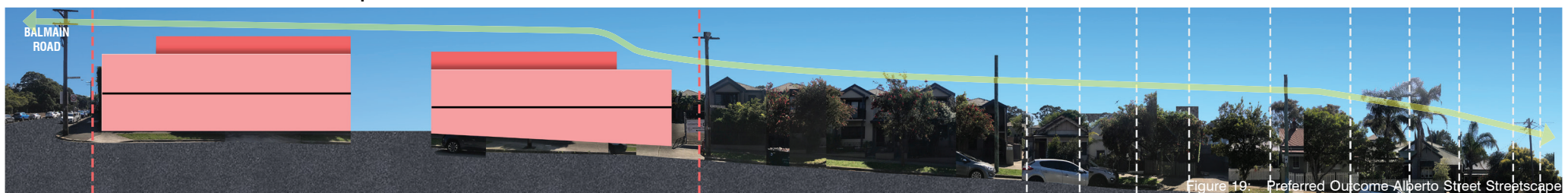


Figure 19: Preferred Outcome Alberto Street Streetscape

2.5 Open Space

The proposed location of communal open space presents several notable issues.

Amenity

The proposed communal courtyards (highlighted in red in **Figure 22**) will receive no direct sunlight at any time throughout the day (see solar analysis diagrams on the following page). This renders them non-compliant with Objective 3D-1 of the ADG which states that:

'Developments achieve a minimum of 50% direct sunlight to the principal open space for a minimum of 2 hours between 9am and 3pm.'

Privacy

The location of communal open space atop the roof of buildings will create significant privacy issues due to the potential for overlooking into the habitable rooms and private open space of neighbouring buildings.

Neighbourhood character

Open space of surrounding dwellings within the locality is predominately located at ground level within the front or rear of the site. The proposed communal open space atop the roof of buildings is inconsistent with the neighbourhood character and also contributes to the bulk and scale of the proposal.

Safety

The proposed public plaza fronting Balmain Road (**Figure 20**) is enclosed by three buildings presenting a significant safety issue as it only has one entrance and exit point.

Given the sites large area, open space should be provided along the ground plane consequentially creating a through site link and separating built forms as demonstrated in **Figure 23**.

Proposed Public Plaza



Figure 20: Proposed Plaza (source: Roberts Day UDR pg.41)

Proposed Communal Open Space

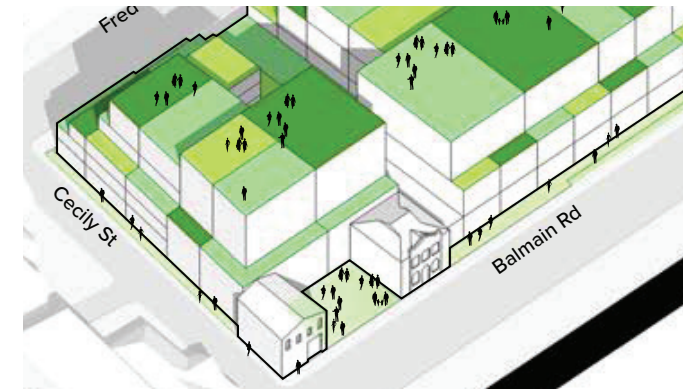


Figure 21: Proposed rooftop gardens and communal open space (source: Roberts Day UDR pg.41)

Proposed Open Space



Figure 22: Proposed communal open space areas (source: Roberts Day UDR pg.68)

Desired Open Space

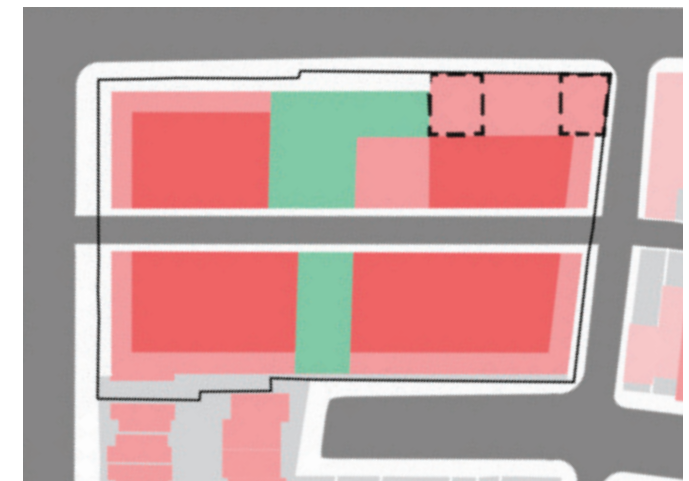


Figure 23: Preferred open space location

3.0 Solar Access & Overshadowing

3.1 Shadow Analysis

Solar analysis diagrams presented in the report indicate the proposal will have poor solar amenity and impact the existing amenity of neighbouring residential properties.

- The proposal will create significant overshadowing impacts to neighbouring properties along Alberto Street and Fred Street.
- The communal open space areas within the site will be of extremely poor amenity as they will receive no direct sunlight at any time throughout the day.
- The private open space of apartments overlooking Fred Street will be in shadow from 10am onwards.

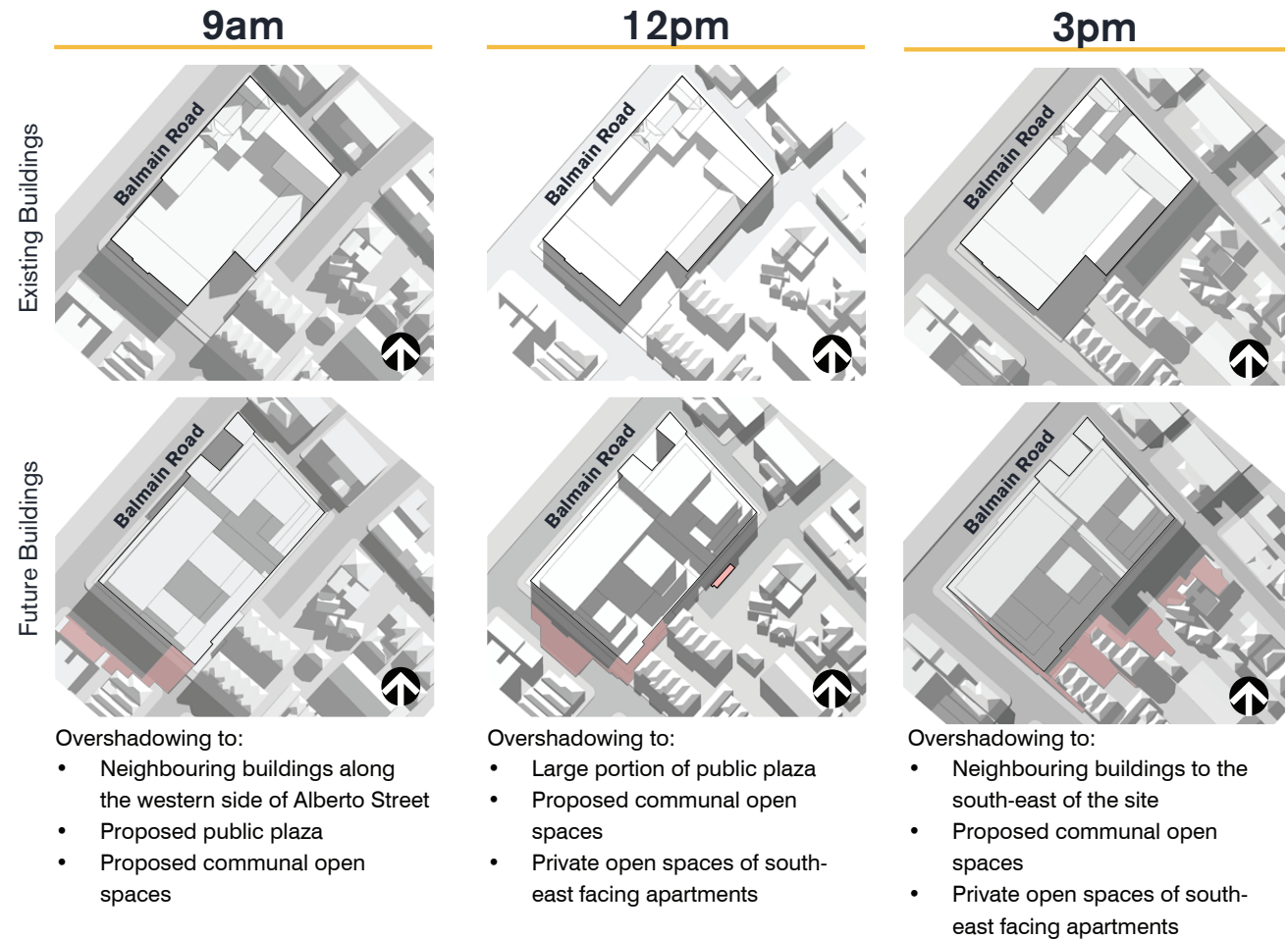
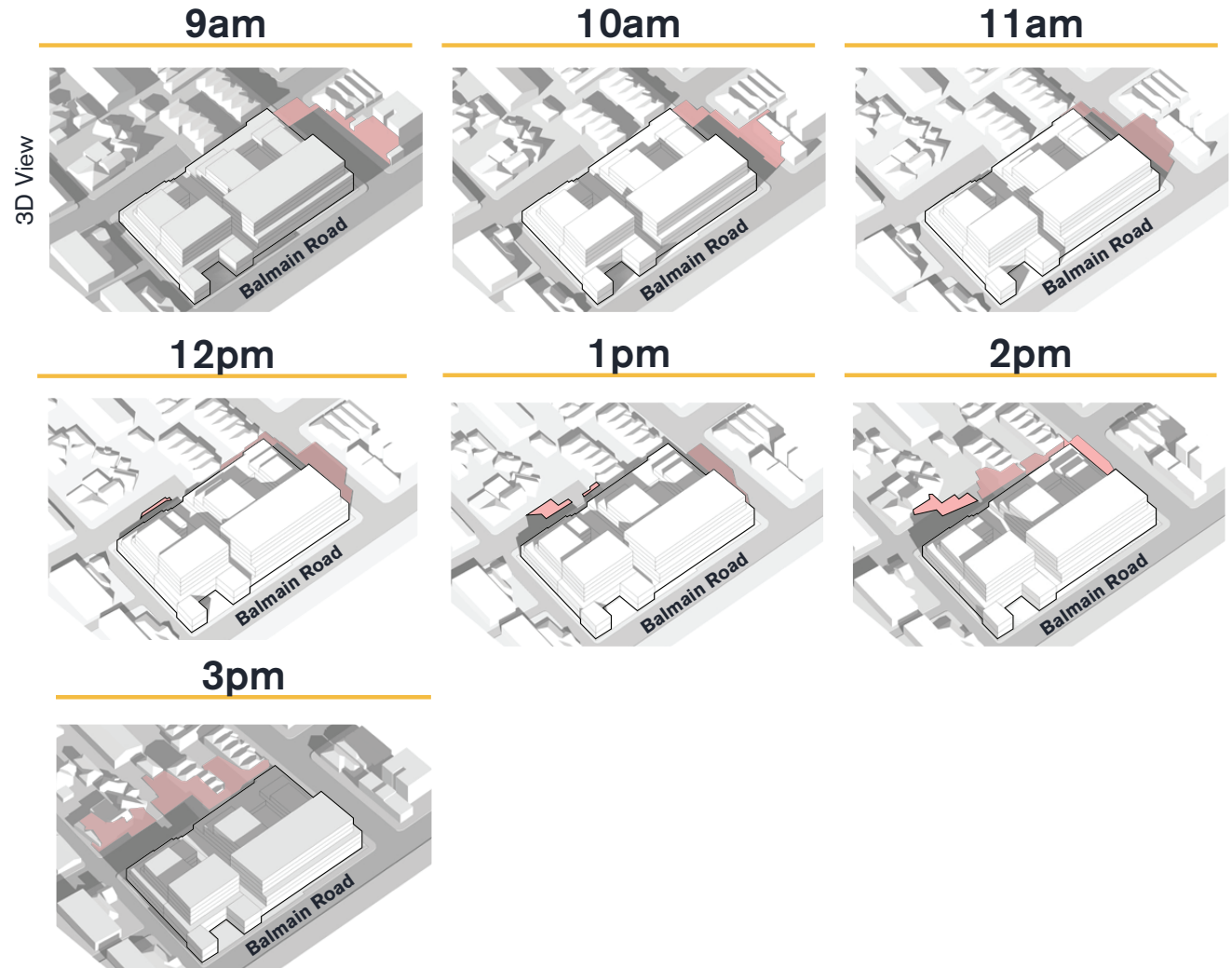


Figure 24: Solar analysis diagrams (source: Roberts Day UDR pg.79 & 79)

3.2 Inadequate Shadow Analysis

The solar access/shadow diagrams presented in the report are inadequate and do not properly demonstrate overshadowing to the site's surrounds or solar access to the proposed residential apartments and communal areas.

Views from the sun diagrams should be produced to better understand the shadow impacts of the proposal.



4.0 Proposed Controls

The proposed controls do not provide enough restriction to ensure that future development is not of a larger scale than the proposed massing illustrated in the report.

The proposed maximum building height across the site is 23 metres and the built form controls in the proposed Development Control Plan only propose 3m upper level setbacks and a 9.55m streetwall height along Fred Street.

- *The main building envelope fronting Balmain Road and Cecily Street shall be setback 3m min at the fourth storey.*
- *The building envelope fronting Alberto Street shall be setback 3m at the third storey.*
- *The building envelope fronting Fred Street shall be no taller than the existing building, being 9.55m.*
- *Individual buildings shall be designed as a series of vertical elements to create a fine-grain built form to contribute to the character of the area.*
- *New buildings fronting Balmain Road shall be designed with a ground floor with floor-to-ceiling height of 4.8m*

The lack of restriction proposed in these controls creates the potential for a building typology that is very different to the illustrated massing shown throughout the report.

Height of Building

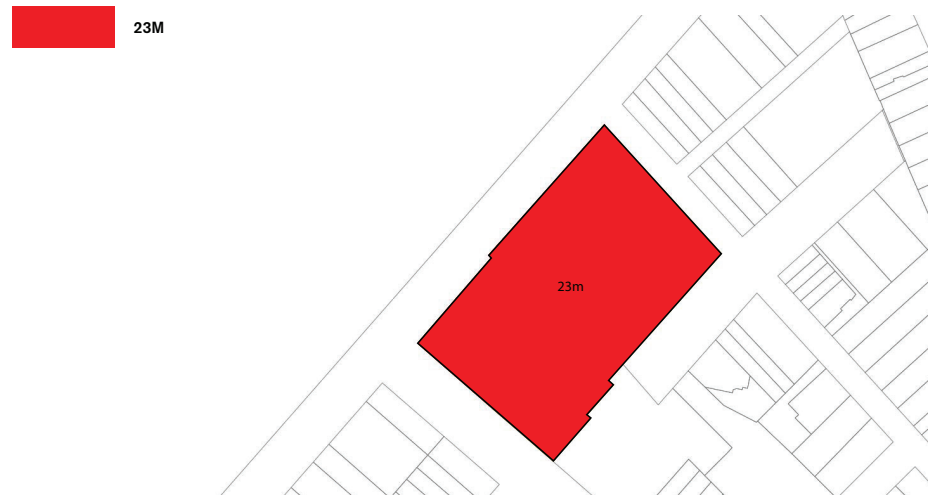


Figure 25: Proposed LEP height control (source: Roberts Day UDR pg.85)

Floor Space Ratio

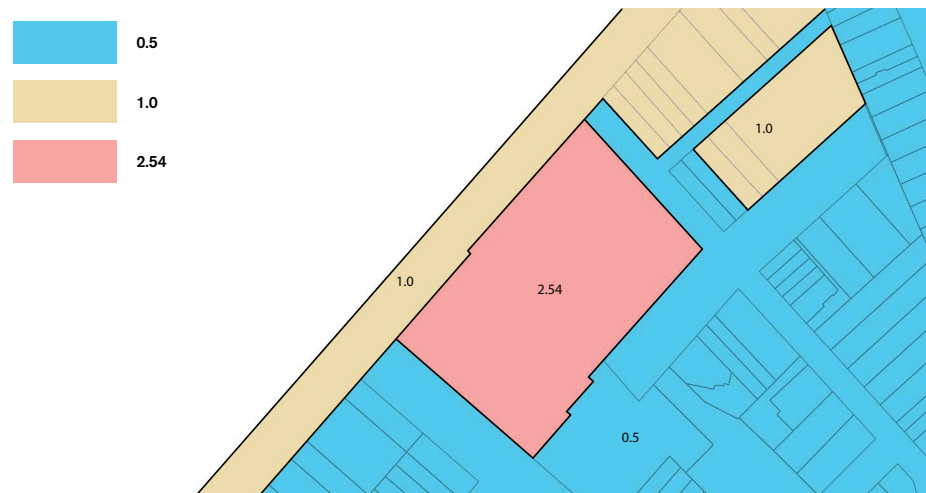


Figure 26: Proposed LEP floor space ratio control (source: Roberts Day UDR)

5.0 Conclusion

The proposal for a 6 storey building is a gross overdevelopment considering its location in an area characterised by 1-2 storey dwellings which unlikely to transition to higher densities in the future.

As demonstrated in this report the proposal will have an unreasonable impact on the streetscape, character and amenity neighbouring properties.

The proposal is not supported due to the following issues:

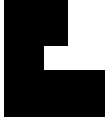
1. The context of the precedent examples used to support the proposal is very different to that of Lilyfield nullifying their relevance to the proposal.
2. The proposal presents a development scheme which:
 - is not compatible with the existing neighbourhood character;
 - is inconsistent with the existing streetscape;
 - is far too large in terms of its bulk, and scale;
 - does not improve the permeability of the locality;
 - provides poorly located open space with low amenity;
 - will impact the amenity of neighbouring buildings;
3. The proposed LEP controls do not provide enough built form restriction.
4. There is not enough information provided within the report to assess whether the proposed building typology will be able to provide apartments that are able to meet the design requirements stipulated in the ADG.
5. Approving a development of this bulk and scale will set a dangerous precedent which has the potential to transform the character of Balmain Road and Darling Street.

Accordingly, this Planning Proposal should be refused due to the aforementioned urban design issues.

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From:



Lilyfield (Objection)

Hi,

Please consider this an objection to the above mentioned development proposal. My concerns are listed below but I don't believe the available physical infrastructure around the site can support the increase in housing (proposed 142 apartments) in its current state.

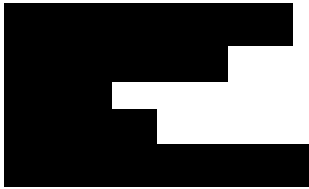
Proximity to transport – the site does not have good access to public transport as implied in the Planning Proposal Document. The site is serviced by a limited bus service (currently there is only a partial bus service to the CBD, L37 peak hours on weekdays). The 440 is mentioned in the document but wouldn't be the preferred service if travelling to the CBD and terminates at Rozelle in the opposite direction. The bus routes on Victoria Road are already at capacity, if not over capacity, during peak periods and not able to deal with additional strain. There is no current direct access to the Rozelle light rail, as mentioned in the document, and I think it unlikely that the majority of residents are going to walk to Lilyfield Light Rail. Therefore, I don't think the current infrastructure can support the increase. I disagree with the assessment by CBRK that the existing road network can adequately accommodate the additional traffic generation. I don't think this has accurately considered the impact of cars leaving the site on the flow of traffic on Balmain Road. The flow is constant during peak periods and it would be a challenge for cars to leave the building. Despite leaving on Alberto Street the traffic will likely turn into Balmain Road or travel through residential streets down to Lilyfield Road. The site is within a road network which is already struggling to cope with additional local traffic and additional works traffic generated by the site at Rozelle.

I'm concerned by the precedents used in the document and do not think these are comparable locations. The buildings at East Village in Sydney and Pyrmont Bridge Road are on 4 – 6 lane roads and bordered by much more industrial buildings (the Moore Park SupaCentre and Sydney Fish Markets as examples). The height proposed isn't in keeping with the local landscape and whilst the light impact is described as minimal, I feel surrounding homes would be dwarfed by this size structure.

Finally, there's no mention of the childcare centre located in the Gatehouse of Callan Park (Balmain Road at Cecily Street entrance) which would be within the 250 metre radius from the site location (as per map on page 15 of the document). I would have expected to see some impact assessment on this, especially in relation to site contamination.

Regards,





14 October 2019

NSW Government Planning Panel

Planning Proposal Number - PP_2017_IWEST_018_00
Panel Reference - 2017SCL068

Letter of Objection to the proposed development at 469-483 Balmain Road, Lilyfield

I have recently been made aware of the planned proposal to develop the light industrial site at 469-483 Balmain Road, Lilyfield. Whilst I have no objection to bringing new life into old buildings, the scale of this project is the cause of my concern.

Lilyfield is a low density dwelling area with very few multi level apartment buildings within the suburb and surrounding areas. The proposed development includes 142 apartments, bringing an estimated 250 new residents. In addition, the proposed development will provide a 6000 sqm non residential / employment space which is not in keeping with this area. There are a number of factors that I feel will damage the existing environment and local Lilyfield community and I have included my main objections below.

My first objection is the impact this residential development will have on the current educational facilities in the area, namely schools and childcare facilities. The local public primary schools are already close to or at capacity. This proposed development falls in the catchment of Orange Grove Public School, and the HillPDA consulting document referenced in 2016 states that Orange Grove Public is 164% over capacity. The catchment area for Rozelle Public School was reduced in 2018 resulting in an even wider catchment area for Orange Grove Public School. This HillPDA consulting report appears to reference data up to 2016 only and with young families making up a high percentage of the local community residents, more recent data must be used when planning for such large scale projects which will impact families in the area. I feel their estimate of an additional 18 primary school (Kindergarten to year 6) places is underestimated for this area. As stated in Table 17 of their Social Infrastructure Requirements. Not only would this have an impact on education services, but would also impact the availability of before and after school care services at local public schools. The list of After School care providers in the table 15: Child Care Facilities in Proximity to the site, 2016 is out of date, as the service at Jimmy Little Community Centre has not operated since mid 2017. Again, this shows that proposals are being developed on out of date and inaccurate data.

In addition to school education, early childhood education must also be considered when planning such a large development. Having had our own preschool age children use local child care facilities for the last five plus years, we know first hand that there are very few places available to new families in the area so the introduction of 142 apartments would put a further strain on these crucial services. Again, the data referenced is three years old and must be updated to accurately understand the need for child education services. My conclusion is that the data being used is 3 years out of date currently and by the time it will be completed the development would have a have a major impact on the community.

My second objection is the impact of additional motor vehicles on car parking and traffic congestion in the immediate vicinity of the proposed development. A majority of residents rely on on-street parking and the roads around Cecily Street, Fred Street, Alberto Street and Maida Street are already overcrowded with many residents required to park a long way from their front door. According to the most recent inner west census data, the number of cars per dwelling are 34.8%* for a single car and 36.2%* for two cars. Using this recent census data, it is reasonable to estimate that 142 new apartments would result in approximately 100 additional vehicles for these new residents being in the area. Based on the minimum car parking of 77 spaces allocated in the report by Colston Budd Rogers & Kafes, there is still likely to be an increase on demand for on-street parking which is already a problem for residents within the vicinity of the proposed development. The figures above do not factor in increased traffic and parking due to visitors to the new proposed site.

All of these vehicles would also access the parking by either Fred Street or Alberto street which will again create more traffic on these narrow roads as they will then need to exit on Balmain Road via Cecily Street.

The report by Colston Budd Rogers & Kafes states that the site would produce an estimated 130 working opportunities - of these only approximately 15 people would travel to the site by public transport meaning that the remaining estimated 115 people would be using their cars and would require parking. The report only makes allocation for under ground parking for a maximum of 40 cars and a minimum of 24 cars. This would mean at the very least an extra 75 cars would be looking to park on the existing roads. Also with the introduction of West Connex a large number of local parking areas have been removed around the area.

The proposal states that the addition of the new development would not have an impact on traffic congestion in the local area. Traffic congestion in the local area is increasing and has become particularly congested on weekends. Given the area is largely populated with young families, weekends are a key time for team based physical activities. The transportation of children is normally done by car as there is no convenient public transport system to get to fields and playing grounds. The Balmain District Football Club is one of the largest community based sporting clubs in Australia with over 3000 members and many of their facilities are located in Callan park and other sporting fields within 2km of the proposed development. Given games are played against other inner west clubs on both Saturdays and Sundays, this also adds to traffic congestion on weekends.

In addition, the area is also home to the popular markets located at Rozelle Public School and Orange Grove Public School. These markets are visited by people from all over Sydney and again add to the traffic congestion on weekends. The so called good existing public transport as stated in the proposal document does not provide convenient accessibility to cater for these destinations with buses getting caught up in the traffic jams on Balmain Road.

The proposal also states the light rail stations are close to the development. Having lived close to the proposed development site for over six years now, I can confidently say that the majority of people who live in the proximity of the proposed development do not use the light rail as a form of daily public transport. The nearest light rail station is a 1.2 km walk, and not 800m as stated in the document as they have made this as a direct straight line. This walk takes approximately 20 minutes. Most current residents take the shorter 10 minute walk to Victoria Street to take the bus into the city. Additional residents using these buses for their daily public transport will only add pressure to the already overcrowded bus services that run from the Rozelle interchange. As the Rozelle and Lilyfield area has grown in the last 10 years these services have got busier and busier and now during peak time locals often have to wait for 3 busses to pass before one stops that has space for a couple of people. Bus services from Lilyfield/Rozelle direct to the Balmain East ferry terminal recently ceased, meaning the ferry as alternative public transport option to Barangaroo and city has resulted in more residents using buses at the Rozelle interchange.

The traffic report provided by Colston Budd Rogers & Kafes states that currently 77% of people use their cars to get to their place of work. They have also concluded that somehow that 4% of residents use the train. Given the nearest station is either Stanmore or Town Hall again they would have to be using the local bus service first to get to Town Hall.

They have also suggested that an estimated 170 residents of the new development would travel from the site to a job. From this only 37 people they are proposing would use a bus and around 17 others on some other form of transport this still leaves 116 extra people using their cars everyday.

My final objection is around the proposed examples of previous developments to illustrate projects comparable to proposal on Balmain Road. All of developments referenced as comparable have been built in high density living areas such as London in the UK and Pyrmont and East Village in Sydney. These are not comparable developments as they have been built in high density areas, which is vastly different from the one and two storey dwellings of Lilyfield and surrounding suburbs. Developers are also facing the same issue with the proposed development that is planned for the Balmain Leagues club in Rozelle with the total number of dwelling planned putting too much pressure on the current environment and having a bad social impact on the area. Also as shown on the supplied letter to Mrs Karen Armstrong date 15 September 2017 the Inner West Council failed the Strategic Merit Test and the Council recommended that the panel rejects the proposal. The details on the letter are still exactly the same as the new submission.

The proposed high level development will also have an effect on the surrounding properties with the residential apartments looking directly down onto them. The shadowing issues for existing residents would mean they would only get a maximum of 3 hours of sunlight during the peak times during winter and would prevent these properties from using solar during winter months as a way to become more environmental friendly.

In conclusion:

- I feel that the sheer number of apartments, and resulting increase in new residents, would have a major impact on education services in local community, which are already struggling to keep up with demand. A more up to date impact on key services such as schools and child care should be done focussing on recent data rather than data from 2016 which is out of date.
- The proposed development will put additional strain car parking and traffic congestion in the area which is already an escalating problem and concern for residents.
- The height of the development should be reduced to fit with developments in the local area.

** https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/LGA14170?opendocument*

Regards





INNER WEST COUNCIL

Contact: Harjeet Atwal
Phone: 9335 2247

15 September 2017

[REDACTED]
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[REDACTED]

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RE: 469 – 483 BALMAIN ROAD, LILYFIELD – PLANNING PROPOSAL

I refer to your letter to Council dated 25 August, 2017 regarding the above Planning Proposal that seeks to amend Leichardt Local Environmental Plan 2013.

The Rezoning Review request submitted to the Department of Planning and Environment (the Department) includes a Rezoning Review Report dated August 2017. This document has not previously been submitted to Council. With the exception of the Rezoning Review Report dated August 2017, all other documents submitted to the Department are the same.

The Planning Proposal was submitted to Council on 16 December 2016. The amended proposal was submitted to Council on the 21 June 2017 and is the subject of the Rezoning Request with the Department. The two proposals differ significantly in terms of the zone and all of the proposed development standards as shown in the table below.

	Original Planning Proposal	Amended Planning Proposal (APP)
Zone	B4 Mixed Use	IN2 Light Industrial with residential accommodation as an additional permitted use
FSR	2.3:1	2.54:1
Height	Max 9 storeys - 31m/15m	Max 6 storeys
Employment Floor space	1,600 sqm	6,000 sqm
Residential Floor space GFA/units	14,042 sqm/ 170 units	12,935 sqm / 142 units

The retention of the IN2 Light industrial zone and provision of a minimum 6,000sqm of existing light industrial floor space should be sought as part of any Planning Proposal seeking to redevelop this site. The protection of industrial land for industrial uses is a long standing Council policy consistent with S.117 Ministerial Directions, the Draft Central District Plan precautionary principle for protecting employment land, and Council's position on two previous rezoning proposals for this site.

Customer Service Centres

Petersham | P (02) 9335 2222 | E council@marrickville.nsw.gov.au | 2-14 Fisher Street, Petersham NSW 2049

Leichhardt | P (02) 9367 9222 | E leichhardt@lmc.nsw.gov.au | 7-15 Wetherill Street Leichhardt NSW 2040

Ashfield | P (02) 9716 1800 | E info@ashfield.nsw.gov.au | 260 Liverpool Road Ashfield NSW 2131

The proponent has submitted the Rezoning Review request before Council had considered or agreed how the proposed design and operation of the development would integrate industrial and residential uses. Consequently as it stands the amended Planning Proposal submitted for the Rezoning Review would amend Leichhardt Local Environmental Plan 2013 controls that are less than 5 years old.

Under Planning Circular PS 16-004 the amended Planning Proposal can therefore only be considered if it meets the Strategic Merit Test.

The 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning which underpins the Draft Central District Plan identifies the Balmain Road precinct as one of the most successful small precincts in Greater Sydney.

The amended Planning Proposal could create a development where the proposed industrial floor space cannot be used for this purpose because of inherent conflicts with the residential element. The amended Planning Proposal additional permitted uses would therefore as Productivity Priority 5 of the Draft Central District Plan puts it hinder the role and function of the industrial floor space. In addition Productivity Priority 5 requires any relevant Planning Proposal to demonstrate how this type of issue is taken into account. The amended Planning Proposal does not do this.

The current amended Planning Proposal therefore fails the Strategic Merit Test and Council recommends that the Panel rejects the Proposal. A more detailed assessment outlining Council's concerns is provided in Attachments 1 and 2 with supporting studies at Attachment 3 and 4 and a relevant Australian Research Council report on the importance of artistic creative manufacturing businesses in the Inner City titled Made in Marrickville at Attachment 5 (as a hyperlink).

Should you have any questions or require additional information, please contact Harjeet Atwal on 9335 2247 or Svetlana Kotevska on 9392 5232.

Yours sincerely

A handwritten signature in black ink, appearing to be 'HJ' with a stylized flourish at the end.

Harjeet Atwal

PLANNING OPERATIONS MANAGER

ATTACHMENT 1 – DETAILED COMMENTS

Amended Planning Proposal 469-483 Balmain Road, Lilyfield

POTENTIAL LAND USE CONFLICTS

The amended Planning Proposal urban design for additional permitted use for residential accommodation on this IN2 Light Industrial site would be incompatible with the existing and many other potential industrial activities. Conflicts are likely to arise over access arrangements between vehicles, pedestrians and residential/employment land uses, loading and operating hours as well location of land uses, noise, odour, dust and separation between uses.

The proposed built form does not demonstrate that land use conflicts in the proposed vertically integrated development can be minimised or avoided. The proponent's response to date on the issue of land use conflicts is limited with reference made to having flexibility for access and deliveries from all street frontages except Balmain Road, but the concept plans do not show separate access for the residential or industrial components. The proponent's Supplementary submission on urban design aspects refers to other measures that could be implemented to mitigate land use conflicts within the site that include:

- Separate street access to residential cores
- Smart technology to separate residential and employment access including parking (no details provided)
- Higher acoustic treatment for the slab separating employment and residential components.

Evidence and design solutions for these approaches are not provided.

A precautionary approach would be consistent with the Department's Gateway determination on 16 March 2016 regarding the Victoria Road Precinct, Marrickville that required review of the Residential zoning to retain the IN1 General Industrial Zone. The Gateway Assessment Report as prepared by Department officers indicates that residential development was not supported in part of the precinct given the direct interface with the core industrial lands and the likely land use conflict that would arise.

INCONSISTENCY WITH STRATEGIC PLANS

Council officers have assessed the Planning Proposal against the following State Government planning strategies and directions and Council policies:

- a. Directions for a Greater Sydney 2017 – 2056
- b. A Plan for Growing Sydney 2014, Towards our Greater Sydney 2056 draft amendment
- c. Draft Central District Plan 2016
- d. Section 117 Directions
- e. Leichhardt 2025+
- f. Leichhardt Community and Culture Plan 2011 – 2021
- g. Leichhardt Employment and Economic Development Plan 2013 – 2023
- h. Leichhardt 2014 Industrial Lands Study and Leichhardt Industrial Precinct Planning Report 2016
- i. Leichhardt Local Environmental Plan 2013
- j. Relevant SEPPs including SEPP 55; SEPP 65; SEPP 70
- k. Inner West Council Affordable Housing Strategy 2017
- l. Leichhardt Development Control Plan 2013
- m. Leichhardt Integrated Transport Plan 2013 - 2023

DIRECTIONS FOR A GREATER SYDNEY 2017 – 2056

The Planning Proposal does not address the new policy document titled *Directions for a Greater Sydney 2017 – 2056* and the 10 principles in its Justification.

A PLAN FOR GROWING SYDNEY 2014

A Plan for Growing Sydney 2014, amended by the draft Towards our Greater Sydney 2056, establishes the regional planning framework for new housing, jobs and the growth of strategic centres and gateways close to transport infrastructure. It has several relevant goals, directions and actions.

Goal 1 - A competitive economy with world class services and transport

- Direction 1.9 Support priority economic sectors
 - Action 1.9.2 Support Key Industrial Precincts with appropriate planning controls

The Plan for Growing Sydney, that was amended by the draft Towards our Greater Sydney 2056 released in November 2016, has a vision for Sydney as a metropolis of three cities that is shaped by three main priorities:

Productive Sydney

A growing city
A city with smart jobs
A 30-minute city

A Liveable Sydney

An equitable, polycentric city
A city of housing choice and diversity
A collaborative city

A Sustainable Sydney

A city in its landscape
An efficient city
A resilient city

Towards our Greater Sydney 2056 and Action 1.9.2 of a Plan for Growing Sydney aim to support key industrial precincts with appropriate planning controls. A productivity priority is the 30 minute city. The Plan for Growing Sydney's 2014 *Action 1.9.2 Support Key Industrial Precincts with Appropriate Planning Controls* referenced the Industrial Lands Strategic Assessment Checklist (page 49 Draft Metropolitan Strategy for Sydney to 2031) for the assessment of proposed rezonings of industrial lands and poses the following questions.

Is the proposed rezoning consistent with State and/or Council strategies on the future role of industrial lands?

The Proponent's Economic Impact Assessment states that the proposal is consistent with State strategies on the future role of industrial lands, adopted Council Policy and the SGS Industrial Land Study 2014 that recommends the retention of all industrial lands to meet increased demand from a growing population.

The EIA also states that "it is unlikely that a commercially viable redevelopment for currently permissible IN2 uses could be found and therefore the site would remain underutilised for IN2 uses without the rezoning to allow residential accommodation as an additional permitted use". This is incorrect as the site is fully occupied and utilised and therefore does not need to be transformed from industrial to flexible office/industrial space and commercial uses. The overall Balmain Road precinct has 23 businesses and is suitable for a broad range of employment uses. The SGS Peer Review (Attachment 4) of the proponent's original EIA noted that it did not provide sufficient detail of the businesses and employment on the site nor evidence that the site is underutilised.

The Proponent's EIA has not adequately addressed the potential impact of the proposed flexible employment office/retail floor space on existing businesses or other potential industrial tenants. The introduction of business or office uses, will change the character of the precinct, displace existing uses and change market perceptions of the site. This would in turn lead to higher rents for light industrial uses and displace these uses from the site. This is strongly inconsistent with Council's Employment and Economic Development Plan, Leichhardt

SGS Industrial lands study 2014, SGS Industrial Precinct Planning Final Report 2016. New commercial uses could also create potential land use conflicts with existing industrial uses.

Given the projected deficits of industrial land in the former Leichhardt LGA and the wider Inner West LGA, it is unlikely that there are alternative sites for these uses in the local area they serve. There is a supply and demand gap for industrial land in the Inner West and a need to increase the stock of industrial floor space. The existing uses are urban services for local population and businesses. They should be retained to support a diverse local community and economy.

Is the site: Near or within direct access to key economic infrastructure? Contributing to a significant industry cluster?

The Proponent's EIA states that the subject site is not contributing to a significant industry cluster. Council disputes this as the entire Balmain Road industrial precinct is currently functioning well with 23 businesses providing **urban services** for the area that encourage economic growth, business opportunities and employment.

Despite the amended Planning Proposal's claim about poor accessibility for industrial uses road and public transport accessibility is good. In addition, the West Connex Rozelle portal will be approximately 1km from the site so its subregional and regional accessibility to the north of the Harbour, the Airport and Port Botany will improve.

How would the proposed rezoning impact the industrial land stocks in the subregion or region and the ability to meet future demand for industrial land activity?

Former Leichhardt Council's Industrial Lands Study 2014 and the Leichhardt Industrial Precinct Planning Report 2016 recommended the protection and intensification of industrial floor space with retention of industrial sites because there is a shortage of industrial land at a subregional level.

The former Leichhardt LGA in particular has a small, dwindling stock of industrial land, which means its residual stock of lands must be protected.

The Leichhardt 2014 Industrial Land Study showed that even without any further rezonings at that point in time, the former Leichhardt LGA would have a shortfall of up to 54,965sqm of industrial floor space by 2036 and in the Balmain Road precinct alone, a shortfall of up to 3,297sqm.

Consequently, the approximately 6,000sqm of existing industrial floor space on the site must be retained without any limitations on its use for light industry.

In 2008 the former Leichhardt LGA had 108.9ha of industrial land, including the Rozelle Rail yards/Bays Precinct. Since then around 93ha of industrial land have been or due to be rezoned as follows:

- 4.9ha at George Street and Allen Street, Leichhardt and Terry Street, Rozelle
 - Camperdown and Tebbutt Street Parramatta Road Urban Transformation Strategy (PRUTS) – 12.2 ha
 - Bays Precinct (Rozelle Railyards) - 75.8 hectares
- Total projected loss - 93ha or 85% of the total 2008 Leichhardt LGA industrial land supply (with pre 2016 rezoned sites included).

In other words the zoned land supply will fall from 108.9 ha to 15.9ha in approximately 10 years. This makes it even more important to protect the existing industrial floor space on this site that is almost 40% of the Balmain Road industrial precinct. If it were rezoned, the pressure to rezone the rest of the precinct will be difficult to resist. The whole precinct is 1.8 ha and 12% of the residual industrial land supply of 15.9ha in the former Leichhardt LGA.

How would the proposed rezoning impact on the achievement of the subregion/region and LGA employment capacity targets and employment objectives?

The Balmain Road industrial precinct is currently functioning well with 23 businesses providing urban services for the area and light industrial employment. These businesses contribute to economic growth, business opportunities and employment with 26 mainstream jobs and 50 artists working on the site. Given the cumulative loss of industrial land in the former Leichhardt Local Government Area the capacity of the site to accommodate these jobs should be protected.

The amended Planning Proposal's suggested introduction of flexible employment floor space for offices/retail would potentially have a negative impact on the existing site's industrial floor space provision as well as the rest of the Balmain Road industrial precinct and erode its viability as a locally significant industrial precinct.

The attached SGS Peer Review notes that the proponents original Economic Impact Assessment (EIA) area overview fails to consider the negative impact of the Planning Proposal on adjacent industrial properties in the Balmain Road industrial precinct. SGS recommended that the adjacent sites should be considered in any overview of the area to gain a full understanding of the risk of fragmentation of the precinct.

The site is 6,823sqm and provides large floor plates for an existing furniture wholesaler, an aluminium door/window manufacturer, an import business as well as artist studios and a photography and jeweller business. The loss of the largest site in the precinct to non-industrial employment uses or another zone could damage the role and function of the Balmain Road industrial precinct, thereby setting an undesirable precedent for other industrial precincts that would have a negative impact on subregional employment objectives and targets.

Is there a compelling argument that the industrial land cannot be used for an industrial purpose now or in the foreseeable future and what opportunities may exist to redevelop the land to support new forms of industrial land uses such as high-tech or creative industries?

The Planning Proposal provides no compelling evidence that the site cannot be used for an industrial purpose. It can readily accommodate a wide range of traditional and new industrial land uses. Indeed the original EIA states:

“recent research from Colliers International suggests that there is a significant shortage of industrial properties for lease within the Inner West market...As a consequence, rents and capital values have been experiencing strong growth...some of the demand is being driven by tenant migration with many occupiers being pushed out by rezoning, conversion and infrastructure development. Compulsory land acquisition associated with the West Connex project and the proposed planning changes associated with Parramatta Road Urban Transformation Strategy will result in a decrease in industrial lands supply within the Inner West LGA which will need to be factored into future land use planning” (pg 25 Proponents EIA).

The site is fully tenanted and sufficient demand exists to attract new tenants and based on the shortage of sites in the area, the industrial floor space should be retained as pure industrial floor space unhindered by concepts of flexible business and commercial floor space.

Is the site critical to meeting the need for land for an alternative purpose identified in other NSW Government or endorsed council planning strategies?

The land is not critical to meeting the need for land for an alternative purpose.

The proposal is also inconsistent with the following Goals of the Plan for Growing Sydney.

Goal 2 - A city of housing choice, with homes that meet our needs and lifestyles

- Direction 2.1 Accelerate housing supply across Sydney
 - Action 2.1.1 Accelerate housing supply and local housing choices
- Direction 2.3 Improved housing choice to suit different needs and lifestyles
 - Action 2.3.3 Deliver more opportunities for affordable housing

The plan identifies the most suitable urban renewal areas as well connected to employment in centres and strategic centres, with frequent public transport. This site is not in an identified centre or strategic centre and is not identified for significant renewal.

Goal 3 – A great place to live with communities that are strong, healthy and well connected

- Direction 3.1 Revitalise existing suburbs
- Direction 3.3 Create healthy built environments
- Direction 3.4 Promote Sydney's heritage, arts and culture

Goal 4 – A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources

- Direction 4.3 Manage the impacts of development on the environment
 - Action 4.3.1 Apply urban green cover technical guidelines

The Planning Proposal does not adequately address Goals 3 and 4. The substantial reduction of art studio space from the existing approved 1,200m² to 400m² would adversely effect the existing community. The concept design plans provided so far do not demonstrate compliance with the Apartment Design Guide to ensure that the low density character of the local environment and nearby heritage items including Callan Park are not adversely impacted. Further details would be required to establish if the Proposal could adequately address Goal 4.

DRAFT CENTRAL DISTRICT PLAN 2016

The Greater Sydney Commission (GSC) Draft Central District Plan has productivity, liveability and sustainability priorities. With regard to the productivity priorities, the draft Central District Plan advocates a precautionary approach to the protection of industrial land for urban services and the addition of permitted uses, as Productivity Priority 5. In 2015, the Central subregion had 1,490 hectares of zoned employment and urban services land, as 11% of Greater Sydney's total stock. Only 4% of this land was undeveloped. That employment land stock should be protected. The Plan also confirms that smaller parcels of employment and urban services land are important to the District's economy and that rezonings for other non-industrial uses reduce potential long term growth and improvements in productivity.

The 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning and GSC District Plans, provides a health check for all 135 industrial precincts in Greater Sydney.

Each precinct was scored on job generation, function and output with an overall scale of 0 to 15. Only the largest and most successful precincts such as that around Sydney Airport scored over 11. The most successful small precincts scored between 9 and 10.5. They include this Balmain Road industrial precinct with a score of 9.5.

The 2015 Hill PDA Precinct Review also identified the important role such small precincts play in providing important local urban services. The Balmain Road precinct supports 23 businesses (refer Table 9) including:

Fred Street:

- glass and aluminium industry (domestic and commercial);
- Atom industries (lawn and garden manufacturer);
- coffee roasters;
- architect;
- Thirst for Life (importer, distributor and retailer of premium drinks) and
- art studios.

Balmain Road:

- crystal shop;
- Hanoi restaurant
- beauty centre;
- Balmain timber yard;
- framing shop;
- physiotherapist,
- offices (101 Capital investment services; 5 senses marketing & brand business and a stock broker),
- Revel systems (high tech company for ipad point of sales systems),
- computer support business

This same review also recognises the challenges of creating new employment lands in inner city areas and the following key review points, support the retention of industrial floor space on this site:

- there is strong price driven demand for small industrial spaces (under 500sqm) in the Central Subregion pg 81
- more creative types of uses (designers, food production and sale etc) are attracted to the Subregion pg 81
- small local industries (furniture storage and renovation, printeries, food production and creative industries) flourish in these locations (Leichhardt LGA is specifically mentioned), given nearby local demographics pg 83.
- in terms of industrial trends, there is a growing and evolving demand for industrial areas within inner city and middle ring suburbs of Sydney to serve the needs of the growing local population (i.e. panel beaters and household trades) pg 68-69
- growing demand for more intensive backroom data storage and archives close to inner city offices pg 68
- growing demand for urban support services as a result of forecast rate of residential and business population growth pg 68
- in the Bays Precinct, “the maritime-related industrial uses in the area are well supported. which will see kindred support industry encouraged to move to the area” pg 83. The subject site could accommodate uses to support these maritime industries.

This precinct is functioning well with an urban services light industrial character and some non-industrial commercial activity. Consequently, the Planning Proposal objective of retain light industrial floor space in the IN2 zone can be supported.

The Proposal's 5% affordable housing offer only meets the minimum liveability District Plan target of 5% to 10% affordable housing and improving housing choice and affordability. The Planning Proposal does not sufficiently explain how its proposed Development Control Plan (DCP) linked to a Voluntary Planning Agreement (VPA) will achieve District Plan sustainability priorities.

SECTION 117 MINISTERIAL DIRECTIONS

Question 6 of "A Guide to Preparing Planning Proposals (2016)" prepared by the Department of Planning and Environment, asks "Is the Planning Proposal consistent with applicable Ministerial Directions" (section 117 Directions).

Direction 1.1 Business and Industrial Zones, Clause 4(d) states that a Planning Proposal "should not reduce the total potential floor space area for industrial uses in industrial zones". To be consistent with this direction the Planning Proposal must retain the existing industrial floor space e.g. a minimum of 6,000sqm.

Council's policies, recent industrial lands studies and the 2015 Hill PDA Industrial Precinct Review prepared for the NSW Department of Planning to inform the GSC Draft Central District Plan do not support or justify any loss of industrial/employment land at Balmain Road. The precinct is suitable for and well positioned to retain and attract light manufacturing and creative industries.

Further evidence is required to clarify whether the Planning Proposal is consistent with Direction 2.3 Heritage Conservation given the heritage significant buildings on or close to the site including the State Heritage listed Callan Park. The proposal must include a report assessing its impacts on these heritage items.

LEICHHARDT 2025+ STRATEGIC PLAN

Leichhardt 2025+ is the strategic plan for the former Leichhardt LGA. It's six key service areas underpin Council planning for social, environmental, economic and civic leadership outcomes over a 10 year period.

The height, bulk and scale of the proposed development will have an impact on community wellbeing and the places where residents of the area live and work. Further architectural and urban design details are required to determine the Planning Proposal's consistency with the following objectives, key goals and strategies of the Plan:

- maintain and enhance the character of the urban environment
- "to promote thriving and diverse businesses that build on the demands and characteristics of the community"
- support and share innovation and creativity to develop the local economy
- promote affordable, accessible, adaptable and diverse housing types
- promote a high standard of urban design in the public and private domain

Retention of 6,000sqm of light industrial floorspace, would be consistent with the objectives of promoting diverse businesses, supporting creativity and developing the local economy as well as protecting economic assets and the supply of industrial land.

LEICHHARDT COMMUNITY AND CULTURE PLAN 2011 - 2021

The Leichhardt Community and Culture Plan is a 10 year strategic plan that addresses social and cultural aspirations, challenges and related issues. It underpins the Community Strategic Plan.

The first floor of the former bakery part of the site provides approximately 1,200sqm of studio space for 50 artists. The proposed 400m² of art studio space would be a significant reduction. Consequently, the Proposal is inconsistent with the following objectives and strategies of the Community and Culture Plan:

- foster strong clusters of creative and recreational activities (Strategy 2.1.3)
- enlivening the arts and cultural life (Objective 4)
- the Leichhardt Local Government Area is a place where arts and cultural practice is energised and connected (Outcome 4.3)
- support artists to access affordable work, rehearsal, exhibition and living spaces that are permanent or transitional (Strategy 4.3.2)

LEICHHARDT EMPLOYMENT AND ECONOMIC DEVELOPMENT PLAN (EEDP) 2013 SGS INDUSTRIAL LAND STUDY 2014 SGS INDUSTRIAL PRECINCT PLANNING 2016

The Balmain Road industrial precinct is recognised in the EEDP as one of the Leichhardt LGAs main industrial precincts. In 2011, 18% of LGAs jobs and 17% of the LGAs residential workforce (approx. 4,988) people were employed in light industry, logistics and wholesale trade and this grew at a rate of 6% between 2006 – 2011 or more than 1% per year (the 2016 Census employment figures are not available yet). The former Leichhardt LGA had a 3% industrial land vacancy rate in 2015 (% of undeveloped land) based on NSW DoPE Employment Lands Development Program 2011-2015.

The former Leichhardt Council commissioned SGS to undertake two industrial land studies in 2010 and 2014 and an industrial precinct study in 2016. The Planning Proposal has been assessed against these studies.

The Balmain Road precinct floor space is 18,072sqm comprised of:

• local light industry (services)	7,365sqm
• office	5,534sqm
• light manufacturing	<u>3,613sqm</u>
Total	<u>18,072sqm</u>

(SGS Leichhardt Industrial Precinct Planning Report April 2016 Table 6)

The Planning Proposal site is 6,824sqm or almost 40% of the precinct. The precinct is predominantly an urban services area with industrial trade supplies, small scale manufacturing, retail and wholesale functions supporting an array of light industrial uses. The Balmain Road precinct is projected to have a shortage of 3,297sqm of land by 2036 under SGS's medium supply scenario. It will be the third largest industrial precinct left in the former Leichhardt LGA after current rezonings, Bays Precinct and PRUTS are implemented.

SGS Leichhardt Industrial Precinct Planning Review April 2016 notes that "The precinct has large floorplates considering the relatively small size of the precinct and the clear vehicular access around three of the precinct's sides are an important attribute, especially as vehicles do not have to travel along many local roads to access the precinct" (pg. 54).

There is a shortage of industrial land for local urban services within the former Leichhardt LGA and the 2014 Industrial Lands Study shows a projected deficit of between 7,000sqm to 55,000sqm of industrial floor space by 2036.

Retention of all existing light industrial floor space on site (minimum of 6,000sqm) is consistent with key objectives of the EEDP. These include:

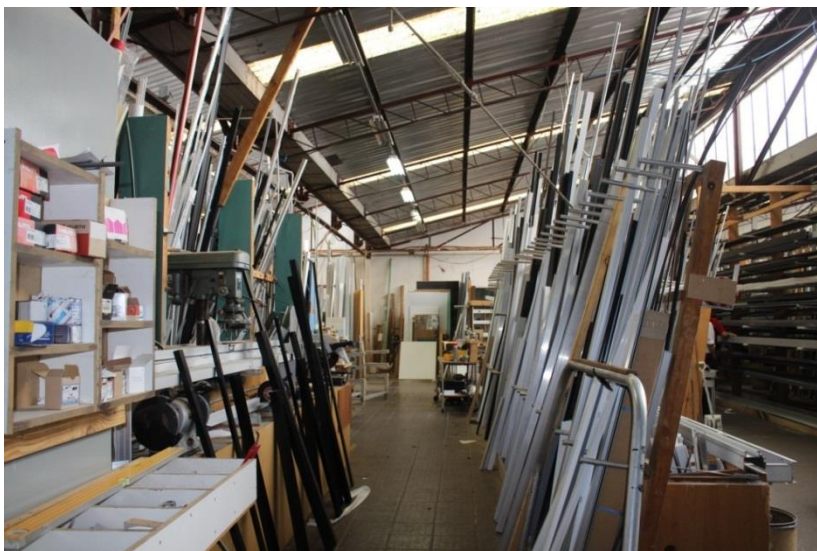
- to protect and leverage economic assets and enhance key employment lands (objective/strategy 4)
- encourage industries and services by location such as light industry, logistics, wholesale (printers, panel beaters, cabinet makers, timber supplies, auto repairs) in the Balmain Road area
- to retain enough industrial land to meet the current and future needs of the local area.

The creative industry sector is recognised as an important element of the New Economy. In 2006 creative industries employed 5% of the NSW workforce. Employment in the creative industries grew at twice the rate of other industries, increasing by 28%, against 13.5% for all industries in the 10 years to 2006. By 2011 the number of Leichhardt LGA residents working in creative industries had increased to 2,800 (9%). The planning proposal would reduce the 1,200m² of artist studio/creative space to 400m².

The 10 Year EEDP built on the SGS 2010 industrial site review methodology by setting out a more detailed analytical approach for the review of proposed rezonings of industrial land from the following three perspectives:

- quantitative (is there enough industrial land to meet current and forecast demand?)
- qualitative (does the industrial land have the attributes required by potential tenants?)
- economic viability (are industrial uses viable on the land?)

These perspectives are detailed in several EEDP criteria which are effectively synonymous with the Plan for Growing Sydney's 2014 Industrial Lands Strategic Assessment Checklist assessed above in this report.



Photos:
***Aluminium window and door
framer light industry***





***Photo:
Aluminium window and door
framer light industry***

ATTACHMENT 2 – BACKGROUND FOR DETAILED COMMENTS IN ATTACHMENT 1 and KEY PLANNING ISSUES

1 Zone and revised Economic Impact Assessment Retention of IN2 – Light Industrial Zone and existing industrial floor space The sites IN2 – Light Industrial zone should be retained for the following reasons: • The site currently accommodates an aluminium window manufacturer, warehouse/Sounds Like Home, an online auction business and creative industries/artist studios. • The industrial floor space supports valuable urban services for the local population and businesses • One of the LEP IN2 objectives is to support and protect industrial land, consistent with local and State Government policies including Council's industrial land studies and Economic and Employment Development Plan • The zone objectives seek to retain existing employment uses and foster a range of new industrial uses to meet the needs of the community. The objectives encourage employment opportunities whilst supporting the viability of centres by not introducing uses such as retail that would compete with centres. Neighbourhood shops and take away food and drink premises which do not detract from local centres are permissible. • The IN2 zone objectives aim to provide a wide range of light industrial, warehouse and related land uses. • Retention of this zone and 6,000sqm light industrial floor space in one of the few remaining light industrial land precincts in the former Leichhardt LGA, ensures no net loss of employment floor space from this site. • This zone will help sustain local light industrial employment opportunities in the inner west where industrial land is increasingly scarce and under extreme pressure from property speculation. It will maintain the existing supply of industrial land in the area, cater for future increased demand for urban services land and enable Council to meet its employment land targets. • Leichhardt LEP Clause 6.9 Business and office premises in the IN2 Light Industrial Zone, permits business and office premises associated with the creative sector such as media, advertising, fine arts and craft, design, film and television, music, publishing, performing arts and cultural heritage. The intent is to place a restriction on IN2 zone office or businesses that might otherwise locate in a town centre. • The existing employment floor space must be protected for light industrial uses in a future redevelopment. An LEP local provision can specify the minimum floor space area for light industry as 6,000sqm thereby ensuring no net loss of industrial floor space. This is consistent with the S.117 Direction 1.1 to not reduce the potential floor space area for industrial uses in industrial zones. <u>Other Business Zones</u> Council officers considered the proponents original Planning Proposal seeking a B4 – Mixed Use zoning and concluded that this could not be supported for the above reasons relating to protecting the IN2 zoned land and also because:- • Given the projected shortage of industrial land in the former Leichhardt LGA and loss of two of the former Leichhardt LGAs largest light industrial IN2 zones to Business zones in the Parramatta Road Urban Transformation Strategy (PRUTS), with B4 – Mixed Use at Taverners Hill and B5 – Business Development at Camperdown, there is no need or justification for rezoning this Balmain Road site to B4 land • Under Standard Instrument LEP provisions the B4 - Mixed Use Zone objectives include –“To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling”. The zone encourages retail development and

as the site is not part of the current B2 Local Centre at Rozelle this is not supported.

- The mandated permitted uses in B4 zones include commercial premises and shop top housing, which would allow inappropriate large retail uses on this site in addition to mainstream business and office premises having an adverse impact on the Rozelle/Balmain centres
- The LLEP 2013 B4 Zone also includes residential flat buildings as permitted with consent. If the site was zoned B4, there would be no mechanism for Council to require the retention of 6,000sqm light industrial employment as the zone would permit residential flat buildings without any employment uses.
- The LLEP 2013 B4 Zone prohibits Industries. This includes general industry, heavy industry and light industry and rezoning this site to B4 would result in a loss of light industrial employment uses/floor space.

No other business zone is appropriate for this site for the following reasons:

- The Zone B5 Business Development Standard Instrument Objective is a mix of business and warehouse uses, bulky goods premises that require a large floor area, in locations that are close to and support the viability of centres. This zone permits with consent the following uses: Bulky goods premises; Child care centres; Garden centres; Hardware and building supplies; Landscaping material supplies; Passenger transport facilities; Respite day care centres; Warehouse or distribution centres.

Leichhardt LEP 2013 does not have a B5 zone although this zone is proposed in the PRUTS area. PRUTS does not support residential accommodation in the proposed B5 zone.

- The Zone B6 Enterprise Corridor Standard Instrument Objective is to promote businesses along main roads (including business, office, retail and light industrial uses). This zone mandates the following uses as permitted with consent: Business premises; Community facilities; Garden centres; Hardware and building supplies; Hotel or motel accommodation; Landscaping material supplies; Light industries; Passenger transport facilities; Plant nurseries; Warehouse or distribution centres.

Leichhardt LEP 2013 does not have a B6 zone although it is proposed by PRUTS which would make residential a permitted use in the LLEP 2013. This would be inappropriate for Balmain Road which does not meet Enterprise Corridor criteria.

- The Zone B7 Business Park Standard Instrument objective is to provide a range of office and light industrial uses, to encourage employment opportunities and to enable other land uses that provide facilities or services to meet the day to day needs of workers.

The Leichhardt LEP 2013 B7 zone prohibits shop top housing and residential flat buildings. It does permit live/work units provided the dwellings accommodate offices or light industrial uses on the ground floor and the dwelling and ground floor premises are occupied by the same persons or persons. This zone would not enhance the level of industrial floor space in the precinct.

Comment on revised Economic Impact Assessment

It is noted that the Proponent's revised EIA does not address S.117 Directions. The Proponent's justification for the Planning Proposal is that the site has reached the end of its economic life. However, the site is fully occupied by an array of light industrial tenants and artists and generates rental income. This is reflected in the 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning and GSC District Plans, health check for each industrial precinct that scored the Balmain Road industrial precinct 9.5

within the category of the most successful small precincts scoring between 9 and 10.5.

The proponent's planning proposal provides conflicting statements. For example, it states that the redevelopment will maintain and enhance the uses in the IN2 Zone through the provision of modern flexible employment space. However, elsewhere it states that a renewed and modern more flexible built form will be attractive to a wider range of land uses compared to the declining industrial and manufacturing uses presently on the site (pg 13). The Economic Impact Assessment (EIA) also states it will not be viable to include light industrial uses in a redevelopment, as follows:

“it is also unlikely that there would be a commercially viable redevelopment option for the Subject Site for traditional light industrial uses given the constraints around accessibility, parking and the need for appropriate buffer zones on account of the surrounding residential uses”. pg 6

The Planning Proposal (pg 5) refers to the retention of existing uses of land but the supporting EIA contradicts this stating that there will be provision of 5,520sqm of flexible office/industrial space or office/retail floor space for employment. The EIA states that the non-residential uses would predominantly be office and retail uses (5,520sqm) as follows:

“Approximately 6,000sqm GFA of non-residential uses comprising:

- o 400sqm for a studio space for artists;*
- o 80sqm for a neighbourhood shop; and*
- o 5,520sqm for office suites and retail uses”*

Council is concerned that the proponent is making a superficial attempt and not genuinely seeking to retain industrial floor space for existing uses. A minimum 6,000sqm of light industrial floor space must be retained to ensure no net loss of industrial land. This should not be encroached into by other uses such as non-creative conventional offices as per Clause 6.9(3) of LLEP 2013.

Employment in a shrinking local light industry sector would also become more difficult to find in the IWC area. The sort of office and retail jobs that might materialise from conventional office uses on the site can be readily found in Inner West centres and in the Sydney CBD.

The EIA claim that the EEDP advocates transforming appropriate industrial land into affordable housing for key workers and students is erroneous. The analysis section of the EEDP dealing with generic Industrial Trends actually only states that transforming appropriate industrial land into affordable housing is a **policy option** for investigation by Council. In addition such a rezoning if found to have merit would have to be for a 100% affordable housing project.

2 Urban Design, Building Heights and Distinctive Neighbourhood Character

The proponent has not provided a full ADG compliance assessment of the Proposal's concept designs against SEPP 65. It is considered that the bulk and scale and the FSR of 2.54:1 is excessive and incompatible with the low density character of the area, adjacent Local and State Heritage Items and heritage significant buildings on site.

The design has negative amenity impacts including poor streetscape outcomes due to the height, bulk and scale, limited residential building setbacks, overshadowing of proposed common open space areas that are located to the south of the tallest residential buildings and overlooking of the front and rear yards of Fred and Alberto Street properties.

A detailed urban design report and site specific DCP, supported by concept design plans to demonstrate compliance with the SEPP 65 and Apartment Design Guide are required to determine appropriate heights that complement the character of the surrounding low density neighbourhood.

No sections or floor heights have been provided to allow accurate confirmation of the maximum building height (in metres). The industrial component requires greater floor to ceiling heights in recognition of the proposed industrial uses. This may have a further impact on total building height and its impact on the streetscape and neighbouring properties.

Building envelopes that demonstrate compliance with the ADG are required to determine an appropriate height. A maximum stepped building height of up to 4 residential storeys with plant/lift overruns above the ground floor employment floor space and limited to the Balmain Road frontage may be considered if an urban design can demonstrate unequivocally that is appropriate for the site and local context. This is important with existing heritage buildings adjacent to the site, two heritage character buildings on site and Callan Park opposite. It should be noted that the closest existing flat building on the corner of Balmain Road/Alberto Street is only 4 storeys.

The proposed residential component on the eastern side of the site should be appropriately setback to address the streetscape along Cecily Street. Significant residential setbacks would be required (a minimum 15m) towards the existing eastern industrial precinct with the majority of residential development located to the west of the site closest to Alberto Street.

Greater setbacks are required to the upper stories on Balmain Road to reflect proximity to Callan Park and align with the rear of the on site heritage buildings to be retained.

Appropriate setbacks should be provided to Alberto Street to respond to the low rise residential area on the western side of the development. Additional overshadowing of the properties on Alberto Street should be addressed through adequate setbacks.

The Proponent suggests the two buildings with heritage character on the north east corner of the site have potential to be adaptively reused depending on their structural integrity. Council's inspection found that the buildings are structurally sound and worthy of retention due to their heritage significance. This includes retaining part of the corner building on Balmain Road/Cecily Street and the rear section along Cecily Street where demolition is proposed. The proposal should also be setback further to minimise impact on its curtilage.

Further details to establish how the proposed development would address Leichhardt DCP controls for the Nanny Goat Hill Distinctive Neighbourhood (C1, C2, C5, C7 and C11) are needed. These controls seek to preserve the low-rise, low density character of the area, ensure consistent architectural styles, enhance heritage items and encourage the viability of existing industrial uses. Leichhardt LEP Clause 6.14 (4) requires a site specific DCP for sites of this size.

The Planning Proposal should also address the NSW Government adopted Better Placed policy released by the NSW Government Architects Office that champions good design and great places.

3 Floor Space Ratio/Density

The current Floor Space Ratios for this part of Lilyfield are:

R1 General Residential Zone - 0.5:1

IN2 Light Industrial Zone – 1:1

The proposed Floor Space Ratio is 2.54:1, that has an estimated yield of 142 units. The site area is 6,824m² and the proposed total gross floor area is 17,325m² made up of:

- 11,325m² of residential
- 6,000m² of employment

A reduction in density is required to keep integration with the low density character of the local area and reduce visual privacy impacts/overlooking of neighbouring properties plus overshadowing of open space areas.

Given that the surrounding context is a low density residential and industrial neighbourhood next to the Callan Park State Heritage Item and local heritage items, the proposed FSR of 2.54:1 is excessive. This FSR cannot be justified and is not supported by detailed concept design plans demonstrating compliance with the Apartment Design Guide. The proponent needs to reduce the FSR to ensure:

- higher quality urban design outcomes in keeping with the existing low density neighbourhood character
- minimal amenity impacts on existing properties
- better outcomes for the residents of the proposed development in respect of elements such as solar access and extent of landscaped area

The proposal must demonstrate consistency with the design quality principles of SEPP 65 especially Principle 3: Density. Generally where Council has supported rezoning of industrial land for residential flat buildings developments in similar low density areas an FSR of 1.5:1 has been shown to have more acceptable bulk and scale outcomes.

4 Solar Access, Overshadowing and Visual Privacy

Solar Access and Overshadowing

Insufficient details have been provided to determine whether:

- 70% of the apartments within the development receive 2 hours of sunlight and
- a minimum of **2 hours** direct sunlight to over 50% of the common open spaces, in compliance with the *Apartment Design Guide*

Leichhardt DCP 2013 Part C3.9 Clause C17 requires that new developments must ensure that solar access is retained for three hours between 9am and 3pm during the winter solstice to 50% of the total area of north facing private open spaces of neighbouring dwellings. The proposal appears to comply with this requirement, however detailed solar access diagrams should be submitted to clarify this.

Visual Privacy

Inadequate separation distances are proposed between buildings and are non compliant with the ADG, which would have a negative impact on visual privacy. The ADG requires that buildings 6 storeys in height have a minimum building separation of 18m whereas only 6m and 13.6m separation is provided. Also, between the 6 storey and 4 storey components 15m is required and 12m to 13.6m is provided.

The 3.5m to 3.8m setbacks between the 14-22 Alberto Street townhouses to the south of the Planning Proposal's 2 storey buildings, would be inadequate in privacy terms. The ADG requires that for buildings up to four storeys there is 6 metres separation to habitable rooms/balconies and 3 metres to non-habitable rooms and that this is increased by 3m when adjacent to a different zone that permits lower density residential development to provide for a transition in scale and increased landscaping. Consequently, a 6m to 9m (where there are habitable rooms) setback would be required to the townhouses to the south. The proposed development only has a 3.8m setback to the townhouses and it is occupied by a proposed public footpath right on the boundary which would further reduce the privacy of the immediately adjacent townhouses.

5 Amenity and open space

The ADG requires communal open space to be at least 25% of the site. The subject site area is 6,825sqm. A minimum of 1,706sqm of communal open space is required. Detail is required to be shown on the plans confirming the open space provided on site.

The ADG requires that at least 60% of apartments are naturally cross ventilated and details need to be submitted to confirm this.

The proposed Fred Street/Alberto Street pedestrian link is a narrow strip abutting the proposed buildings with no passive surveillance. In order to create integration with the local community and enhance pedestrian safety, there should be a through site link provided from Fred Street to Balmain Road. This link was an agreed upon principle set for the site following community consultation in 2007. This would create a buffer and separation between uses, plus an opportunity for ground floor businesses to have shop fronts to this laneway. Further, it could be designed to allow shared pedestrian access to Balmain Road and use by service and delivery vehicles. A vehicular cul-de-sac with bollards and other design measures could be used to prevent vehicles exiting onto Balmain Road. A through site path designed in accordance with the principles of Crime Prevention Through Environmental Design and Principle 7 – Safety of SEPP 65 will be safer and more socially inclusive.

The building footprint is to all site boundaries with minor exceptions and this limits the available deep soil zone for planting and landscaping. The ADG requires 7-15% of the site to provide deep soil planting. The Proponent's statement suggests that 820sqm (12% of the site) of deep soil planting will be provided, but this is not shown on any plans. The footpath widening would not be sufficient.

6 Affordable Housing

Council's Affordable Housing Policy requires 15% affordable housing in high density redevelopments on private land based upon a GFA of 1,700m² or more. This equates to 22 units in this proposed development. The proponents offer of 5% (7 units) represents a deficiency of 15 units. The proponent suggests that 400m² artist studio space, employment space, 11% of the site for footpath widening and a pedestrian link from Fred Street to Alberto Street will be public benefits in lieu of affordable housing.

Minimum public benefit benefiting the public interest is derived from footpath widening and the pedestrian link through to Alberto Street. This will benefit the future occupants of the development more so than the existing community and cannot be used as grounds to reduce the affordable housing provision. The proposed artist studio space is grossly deficient compared to the current artist studio space on the site.

The proponent fails to acknowledge that there is a disproportionate and growing number of local people in housing stress and a chronic shortage of affordable housing in the Inner West local government area (LGA). Council policy is to increase the supply of affordable housing for very low, low and moderate income households.

The Subregional Draft Central District Plan has a target of between 5% to 10% affordable rental housing to be applied in rezonings for residential development and the proponent is only aiming to achieve the lowest benchmark.

7 Traffic and Transport

The Proponent's Updated Transport Aspects Report of the revised Planning Proposal indicates that there will be little or no significant impact on the existing road network or intersections. In summary it suggests:

- that SIDRA capacity analysis indicated that with the additional development traffic:
 - the signalised intersection at Balmain Road and Cecily Street would have a good level of service A and B as would the Fred Street/Cecily Street intersection
 - unsignalised intersection of Balmain Road and Alberto Street would have a reasonable service level of B.
- a likely peak period traffic generation of 70 vehicles per hour, 2-way
- traffic increases on the four surrounding streets would be between 5 to 35 vehicles per hour two-way at peak times (+35 on Alberto and Fred Streets)
- parking and access details will be finalised as part of the development application process, however, the report states that *"Appropriate access will be provided to the development from Alberto Street, Fred Street and/or Cecily Street"*.

Between 115 and 185 on-site parking spaces will be provided depending upon the final residential unit mix. This huge range creates a substantial uncertainty about the traffic that would be generated by the development. While the study indicates traffic generation based on RMS guidelines, these guidelines are not specifically based on the provision of parking, which can have an impact on the ultimate traffic generation of a development.

In accordance with the Council's *Development Control Plan 2013*, the total required parking is a minimum of 174 and a maximum of 276 car spaces for the entire development including residential, commercial/industrial/shops and visitor parking. The proponents suggested minimum parking provision of 115 to 185 car spaces does not achieve this. The proponents suggested Draft DCP parking and access controls states that "subject to an agreed 'green travel' plan, parking rates may be discounted from existing rates to reflect proximity to public transport and other measures (e.g. car share).

In relation to potential increased loading on existing public transport services the Study provides mode share estimates. It does not provide current patronage rates for local bus services so the estimates of mode share do not allow any assessment of the impact of the development on overcrowding of bus services.

Council considers however that from a transport and traffic perspective the proposal is unlikely to have major impacts on local amenity, street network operation or the adjacent public transport system.

Concern is expressed, however, that without details of the access arrangements and number of movements through each point of access, safety considerations cannot fully be addressed. Additional details are required to accurately assess the proposal.

Council's Traffic Engineers have advised that the residential access driveway to the site should be via Fred Street as it has wider footpaths, and has less traffic and pedestrian movements. Given the industrial access will have to accommodate service vehicles it is recommended that this vehicular access should be via Alberto Street. This will distribute the traffic more evenly across the road network as Alberto Street is much wider than Cecily Street there would be improved manoeuvrability for larger vehicles associated with industrial land uses.

It is unclear where the residential traffic generation rates have been derived from. Further details should be provided regarding the rates used in the assessment.

8 Contamination

Council has reviewed the Phase 1 Contamination Assessment site investigation report provided by the Proponent in respect of the *State Environmental Planning Policy No 55 Contaminated Land* (SEPP 55).

At this stage, Council is not satisfied that the site can be made suitable for the proposed residential development and use in accordance with SEPP 55. There are concerns relating to fill from unknown sources as a result of past activities (e.g. asbestos use and the presence of Underground Storage Tanks) on the site. The preliminary site investigation recommends that further investigation is warranted. Consequently, a Phase 2 / Detailed Site Investigation is required. If the Department issues a Gateway determination the following information is required prior to exhibition:

1. a Detailed Site Contamination Investigation by an independent appropriately qualified environmental consultant.
2. the investigation is to be carried out in accordance with Leichhardt's Local Environment Plan 2013 and relevant NSW EPA Guidelines for Contaminated Sites. Under SEPP 55 – Remediation of Land the report should assess the nature, extent and degree of land contamination.
3. if the Detailed Site Investigation Report does not find any contamination of land and groundwater, it must clearly conclude that 'the land is suitable for its intended land use' posing no immediate or long term risk to public health or the environment and is fit for occupation by persons, together with clear justification for this conclusion.
4. if the Detailed Site Investigation Report finds that the land is contaminated and requires remedial works to meet the relevant Health Based Investigation Level, a Remediation Action Plan (RAP) will be required so that Council can satisfy itself the site can be remediated before the site is used for residential development.
5. any RAP is to be prepared in accordance with the relevant Guidelines or approved by NSW Environmental Protection Authority, including the Guidelines for Consultants Reporting on Contaminated Sites. The RAP should include procedures for the following:
 - excavation of Hydrocarbon-contaminated soil;
 - site management planning;
 - validation sampling and analysis;
 - prevention of cross contamination and migration or release of contaminants;
 - groundwater remediation, dewatering, drainage, monitoring and validation; and
 - unexpected finds.
6. a Hazardous materials survey will be required prior to the commencement of any works.

9 Social Impact Assessment

The Proponent's Social Impact Assessment prepared by Hill PDA identifies construction disturbance as the only negative impact of this Planning Proposal. This disregards several other potential negative social impacts.

The SIA states that the social infrastructure requirements in table 16 show a negligible demand for certain social infrastructure. This is incorrect as 142 dwellings represents 2.8% of the Central District Plans 5 year 5,900 dwelling target for the IWC area. The SIA fails to consider the cumulative impacts of placing additional demand on existing infrastructure in respect of recently approved developments such as Allen Street, Leichhardt and future development earmarked for Balmain Leagues, Bays Precinct and general IWC population growth.

Creative Arts / Artists' Studios

The Greater Sydney Commission's Central District Plan (4.7.2) details the importance of arts and culture for connected communities and vibrant public places and states that; "Arts and cultural policy, investment and actions should be well integrated into urban development. This can be achieved through planning proposals for urban renewal areas and priority precincts...". A Plan for Growing Sydney, Direction 3.4 aims to 'Promote Sydney's heritage, arts and culture'. Similarly, Leichhardt Community and Cultural Plan aims to enliven the arts and cultural life by promoting and supporting local creative clusters and helping artists find affordable work, rehearsal, exhibition and living spaces that are permanent or transitional.

The proponents original economic impact assessment report states that 802m² is currently tenanted by approximately 50 artists in partitioned spaces. The days/hours of usage of the partitioned spaces varies for each artist. The reduction of artist studio space from the 1,200sqm approved to the 400sqm proposed in this development would be a significant loss of affordable local artist space and is inconsistent with local and state policies. Attachment 5 demonstrates the importance of such artistic clusters in Sydney's inner city.

The primary demand from the artistic segment of creative industries is for affordable spaces which are suitable for versatile activities, including large scale work such as sculpture. Cheap rent industrial warehouse-style spaces are critical for local artists. Newly built office spaces and shop are likely to be too expensive for most artists and occupied by more conventional commercial businesses that can afford higher rents. Larger affordable work spaces should be incorporated into the proposal to meet this need. The offer of artist studio space in the planning proposal has not detailed whether the artist studios will be dedicated to Council in perpetuity as part of a VPA. Affordable space is key for the existing 50 artists to continue their art and maintain their connection to the place and the arts community.

The assertion that the artist space is underutilised in terms of intensity of usage and that artists could use the space more efficiently by using areas for storage when not on site,

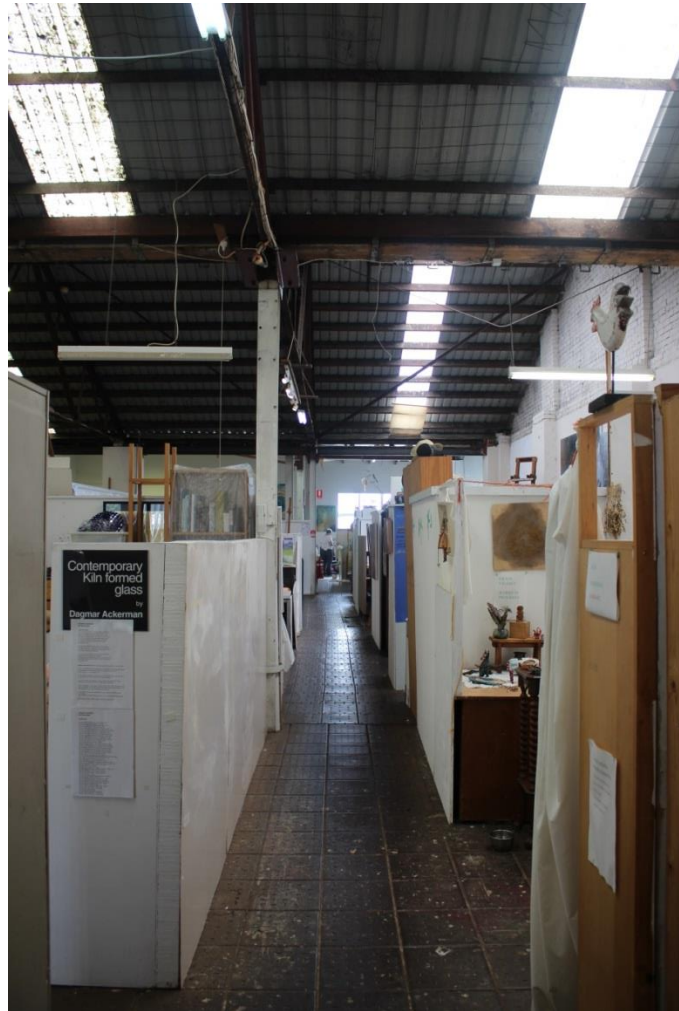


rather than requiring a permanent partitioned space is not supported. It fails to understand the creative process and the needs of artists. This inherently requires more space for working, displaying their pieces, drying paintings and inspirational collective areas for a variety of artists such as ceramists, glass artists and painters. Packing and unpacking their work would disrupt the continuity of the creative process and spaces for processes that are not traditional desk based activities.

The social and cultural aspirations of the local arts community will be diminished unless the Proposal replaces the existing studio space with a similar amount of floor space with favourable rents and terms.

Recreational Impacts

Balmain Road sporting ground is 56m from the site and is not identified in the open space and recreational facilities section of the SIA (Table 15). Council's recreational planners have advised that the Balmain Sports Ground is fully booked and intensively used by sports clubs for training Tuesday, Wednesday, Thursday and Friday evenings up to 9pm with associated flood lights and on weekends until sunset. The use of this sporting ground may result in conflicts with the proposed residential land use of the subject site particularly with night games, noise and flood lights. These recreational activities must not be curtailed as a result of the introduction of new residential development. Council's recreational planner advises that the Planning Proposal relies largely on existing Council and



State managed open space to meet its requirements to provide recreational facilities for new residents. The former Leichhardt Council's recreation needs study highlighted that Rozelle had an open space provision of 1.68 per 1,000 people. This figure is below the NSW benchmark figure of 2.83 ha per head of population. Under Councils S.94 Plans, it is likely that s94 levies payable would be circa \$2,738,186, part of which would be directed to improving existing open space facilities and enhancing access to these.

Out of School Hours and Child Care (OSHC) Services

There are 12 Local Child Care Centres within 2km of the site with 66% of centres almost at capacity according to the SIA (Table 14). A March 2017 Council survey of out of school hours care (OSHC) services in the Inner West LGA highlighted unmet demand for OSHC across the LGA. At nearby Rozelle Out of School Hours Care, the waiting list for after school care during this period was 60. OSHC services in Lilyfield also had waiting lists for after school care or were very close to capacity. The re-zoning proposal is likely to increase demand for OSHC services in an area already at capacity. This is not addressed in the SIA which only identifies capacity in Birchgrove and Leichhardt which

are remote from the site.

Education facilities – primary and high schools

The NSW Department of Education (DoE) has advised that the number of units proposed (originally 170), would generate 10-15 primary school aged students and only a couple of secondary school aged students (based on 2011 ABS data). The DoE advised that there is no current capacity at the existing 3 local primary schools, but future potential expansion of Orange Grove PS could address capacity issues. While all the local Sydney Secondary College's campuses are near capacity, the Planning Proposal demand is very minor (2 students) and can be accommodated. Further, the new inner Sydney high school to open in 2020 will create capacity at the local high schools.

Adaptable Dwellings: The SIA states that some of the dwellings will be adaptable with disabled access, however little detail has been provided.

SIA Methods

If this Proposal was to receive a favourable Gateway determination it is recommended that the SIA demographic analysis section 3 is updated before public exhibition to reflect the latest census statistics for 2016. Current information is needed to ensure accurate community profiling and understanding of potential impacts on the community and infrastructure.

The following omissions and errors in the SIA plus inconsistencies with the Planning Proposal have been identified:-

- it is suggested that the proposed 142 dwellings would accommodate 255 residents. This should be updated to reflect the 2016 census household occupancy rates.
- no consultation has been undertaken with existing tenants, the artists, neighbours or other stakeholders (e.g Friends of Callan Park). The SIA does not adequately address the needs of target social groups such as young people, Aboriginal or Torres Strait Islanders, culturally and linguistically diverse people)
- there is no draft Central District Plan section in the SIA under Planning Policy – section 2 State Planning Policies and Strategies and should address the following draft District Plan Liveability and Sustainability Actions and related outcomes:
 - Liveability Action 5: Increase in affordable rental housing
 - Liveability Action 6: Increase in affordable housing
 - Liveability Action 13: Conserve and enhance environmental heritage
 - Liveability Action 15 & Sustainability Actions 4 & 5: Increase in the provision of community facilities including open space and its utilisation
 - Sustainability Actions 8 and 9: Embed NSW Climate Change Policy framework into local planning and support initiatives for a low carbon future
 - Sustainability Action 11: Mitigate the urban heat island effect in renewal projects and reduce ambient temperatures
- the SIA refers to Leichhardt's residential development strategy and 2008 Inner West subregional dwelling target of 2000 by 2031. This policy and target is now superseded by the Draft Central District Plans 5 year and 20 year dwelling targets It is noted the Inner West Council is already on target to achieve the Draft Central Plans targets and the Liveability Priority 3: Implement the Affordable Rental Housing Target
- the Planning Proposal does not refer to retail uses in the development but on page 5 does state that small offices and work spaces will be provided to attract small businesses, whereas the SIA page 6 refers to retail uses in the new floor space
- SIA refers to flexible commercial/retail space and no definition of what this would be is provided (pg 9)

The Proponent's Planning Proposal request must be supported by a more

comprehensive, robust and updated SIA that addresses the concerns outlined in the assessment above.

10 Sustainability and Stormwater

The Planning Proposal must make a clear commitment to deliver the sustainability measures as illustrated in the proposed urban design in relation to water harvesting/management, solar panels, green roofs/green walls through a site specific draft DCP that also incorporates relevant Leichhardt *DCP 2013* controls.

This full site specific DCP should address water sensitive urban design fully, indoor air quality, transport, building materials and emissions to demonstrate innovation and best practice environmental sustainability. Such an approach is consistent with the objectives of the Council's Climate Change Plan which encourages adaptation to climate change via water sensitive urban design, energy efficiency, renewable energy use of sustainable building materials, connected, walkable neighbourhoods, active and public transport, greening and shading.

The proposal should demonstrate that it will achieve a Green Star Multi-Unit Residential v1 5 star rating as per the Proponents documents submitted and amended Urban Design Report. The former Leichhardt Council attained a very high standard of environmental sustainability performance for the rezoning of industrial land at Terry Street, Rozelle with the developer achieving a Green Star 5 star rating. The Leichhardt Council Environmental Sustainability Strategy encourages the use of Voluntary Planning Agreements as a mechanism to achieve development with environmental performance above NSW Government BASIX SEPP requirements.

Council's Stormwater Engineers noted that the development would exceed the capacity of the existing stormwater pit in Fred Street and that Councils stormwater infrastructure and drainage system would need to be extended by the developer to address this issue.

11 Heritage

Council's independent heritage assessment of the site by GML Heritage Pty Ltd confirms that two existing character buildings meet the historic and rarity, heritage significance criterion for listing (refer Attachment 3). The assessment concluded that:

- The 1907 and 1917 buildings demonstrate local heritage significance for historic and rarity values. The remainder of the site does not demonstrate sufficient heritage value to warrant retention.
- Council may wish to consider undertaking a planning agreement with the proponent which encourages the conservation and adaptive re-use of the 1907 and 1917 buildings as part of any future redevelopment of the site.
- Opportunities to conserve and adaptively re-use the 1907 building and 1917 administrative building should be explored by the developer in consultation with Council.
- Further investigation should be undertaken to determine the extent of original fabric which remains in situ and a strategy put in place that encourages maximum retention of original fabric where possible and the conservation of their rare industrial character. A heritage architect should provide input into the design.
- The history and significance of the retained buildings should be communicated to the public via interpretation and the restoration of significant components, for example the painted 'Pilchers Bakery' sign to Cecily Street, the internal features that relate back to the site's original use and early timber/masonry structural elements.

The ABBCO office building, Pilchers Bakery (2 storey brick building on the corner of Balmain Road and Cecily Street) and the connecting building between these two fronting Balmain Road (refer to Figure 1) are therefore worthy of heritage listing under Leichhardt LEP given their significant fabric and must be protected. The proposed concept design currently shows that a significant part of the Pilchers Bakery building would be demolished and must be amended to show its protection and retention. Council's Heritage Advisor site inspection established that the structural walls, floors and ceilings appear intact. The internal partitions and alterations such as false ceilings are reversible and the original floor plan is recoverable. The condition of these buildings do not warrant demolition.

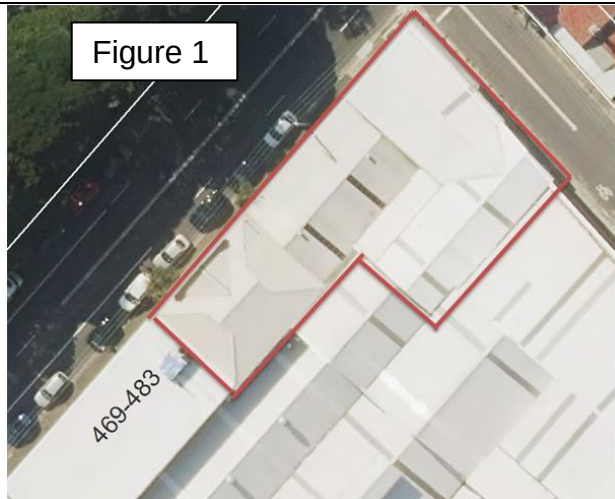


Figure 1

The Proponent's Heritage Assessment must be revised to assess the Proposals impact on Callan Park, a State Heritage Item opposite the site and on the local heritage item on Fred Street, as it currently fails to mention these items. The Heritage Assessment needs to be updated as part of the minimum requirements for a Planning Proposal that include a justification of the proposal under S.55 of the Act and against S.117 Directions with heritage conservation being a relevant Direction.

The Proponent's Heritage Impact Statement's (HIS) assessment of the physical fabric and heritage significance of the buildings is inadequate, particularly in respect of the ABBCO office building. Further assessment is required for the two buildings referenced as the 'character buildings'. The applicant should refer to the Heritage Office of NSW maintenance series of guideline documents (specifically those regarding timber and masonry structures), Australia ICOMOS *Conservation Guidelines for Building Surveyors* and *Engineering Heritage and Conservation Guidelines* published by the Institute of Engineers. The HIS must be updated to rank not only the heritage significant fabric but also the spaces that relate to each building. This will guide development of the site. For instance in large open spaces any infill should be designed to allow an understanding and appreciation of the original space and any exposed timber structures. An archival recording of all three buildings should also be undertaken.

This will underpin a revision of the Planning Proposal to propose the heritage listing of the ABBCO, Pilchers Bakery and connecting buildings shown in Figure 1.

A VPA could recognise heritage constraints that will be addressed in the required site specific DCP.



Photo: Automatic Bread Baking Company (ABBCO - Office Building) and Pilchers Bakery (corner with Balmain Road and Cecily Street)

12 Site Specific Local Provision Clause 6.1

Should the Department support the amended Planning Proposal in its current form and issue a Gateway Determination, Council requires an updated local provision to ensure that the future development will address the following matters:

Development consent may be granted to a single development application for development on land to which this clause applies that addresses the following:

- a. A proposal to develop the 469- 483 Balmain Road site in its entirety,*
- b. A proposal for the purpose of light-industry and residential development*
- c. Not less than 6,000 sqm of the total gross floor area of the development must be used for light industry as defined by permissible uses in LLEP 2013, in the land use table for Zone IN2 and Part 6.9.*

This local provision must also include elements for:

- d. Protection and conservation of the heritage significant buildings on the site as shown in Figure 1*
- e. A pedestrian through site link between Fred Street and Balmain Road*
- f. Minimum setbacks from the site boundaries to the residential component*
- g. The height of the development should be specified in metres and AHD with provision for greater floor to ceiling heights in the light industrial component. Specifically, the ground and first floor levels related to the non-residential and employment floor space must have a floor to ceiling height of 5.2m, with the ground floor of the development reserved exclusively for employment purposes as part of any redevelopment of the land.*

Conclusions and recommendations:

1. Any Planning Proposal for 469 – 483 Balmain Road, Lilyfield must retain the IN2 Light industrial zone and dedicate a minimum 6,000sqm of floor space for IN2 Light Industry permissible uses (including business and offices uses for creative purposes as defined in Clause 6.9(3) of Leichhardt Local Environmental Plan 2013).
2. The amended Planning Proposal has not demonstrated that residential accommodation as an additional permitted use in a vertically integrated development will not hinder the role and function of the industrial zone and the wider industrial precinct.
3. The amended planning proposal is inconsistent with A Plan for Growing Sydney; the draft Central District Plan; the Leichhardt Employment and Economic Development Plan 2013 – 2023, Leichhardt 2014 Industrial Lands Study and Leichhardt Industrial Precinct Planning Report 2016.
4. The amended planning proposal does not propose an adequate level of affordable housing and does not comply with the recommendations of the draft Central District Plan or the Inner West Council's Affordable Housing Policy.
5. The height, bulk, scale and form of the building envelopes sought are excessive and incompatible with the low density character of the neighbourhood and State Heritage listed Callan Park and local heritage items.
6. The planning proposal does not adequately respond to identified heritage impacts.

Should the Department support the Planning Proposal in its current form and issue a Gateway Determination, the following **additional information** should be provided prior to public exhibition:

- a. an urban design report and concept plans accompanied by a detailed site specific Development Control Plan that meets the requirements of State Environmental Planning Policy 65 – Residential Flat Design Code and the Apartment Design Guide (ADG) and achieves a 5 Green Star Rating. These are required to determine compatibility with the character of the area and whether the proposed development standards of height and FSR are acceptable.
- b. additional details of how land use conflicts between the industrial land uses/IN2 zone and existing businesses in the rest of the Balmain Road industrial precinct and new residential accommodation on the site could be avoided or mitigated. This must address building/floor space configuration, separation of uses, access arrangements that should be separate for the residential and employment components, servicing, loading and operating hours and provide research and evidence of successful examples of vertically integrated developments accommodating different land uses.
- c. Evidence of the existing number of businesses, employees and floor space areas.
- d. Provision of at least 15% affordable housing
- e. A Phase 2 / Detailed Site Contamination Investigation to demonstrate that the site is suitable for residential development in accordance with SEPP 55
- f. An updated local provision reflecting the concerns raised in this letter

Amended:

- g. Heritage impact assessment
- h. Economic impact assessment
- i. Social Impact assessment
- j. VPA offer reflecting the above

ATTACHMENT 3

Heritage Significance assessment prepared by GML Heritage Pty Ltd June 2017

ATTACHMENT 4

4a.SGS Peer Review of Economic Impact Assessment

4b. SGS letter of additional advice

ATTACHMENT 5

Made in Marrickville – Creative-Manufacturing Industries Report

(Click on the title/hyperlink to the report)

http://www.urbanculturalpolicy.com/wp-content/uploads/2017/08/Made_in_Marrickville_DP170104255-201702.pdf

Submitted on Tue, 29/10/2019 - 08:57

Submitted by: Anonymous

Submission file: [webform_submission:values:submission_file]

Submission: I am objecting to the proposed development on this sight. The 6 story structure is not in keeping with the surrounding area. Being triple the height of surrounding homes will dominate and overshadow the residential buildings. As well as the increased traffic congestion would be a huge concern. The infrastructure to cope, schools etc is already at maximum.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>



Dear Sir or Madam,

PLEASE NOTE: I do not want my name and address to be made public.

Thank you for the opportunity to respond to the planning proposal 2017CL068- Inner West-PP_2017_IWEST_018_00.

I strongly object to this proposal on several grounds as I will outline below.

[Redacted] and thus are immediately impacted by this proposal. I submit this response on behalf of us both.

We are not opposing the site being redeveloped, we do understand and agree that the site is in disrepair and appropriate for redevelopment. However, we do have concerns about the redevelopment proposed.

1. The sheer size and height of the proposed development is unacceptable. The area to date is a low rise, residential and mixed business/industry area. It is a leafy green area, and has a community 'village' feel to the neighbourhood - in fact this is one of the main reasons we bought in this area. The proposed development would be considerably higher and greatly out of proportion to the existing neighbourhood. The very large development would also dwarf the small and tightly existing homes and businesses in the area. The streets are narrow and the terrace style homes and businesses are too compact to then be overshadowed by such a large development. We also have great concern for the precedent this would create for further large medium and high density developments in the area.

As you will be well aware there has been great debate for many years about the redevelopment of the old Balmain Tigers site on Victoria Road, predominantly because of the community rejection of large high multi story developments in an area otherwise devoid of this type of development. This serves as further support that this is not the type of development desired within this area.

2. The images portrayed throughout the planning proposal and urban design report are misleading. None of the images of the proposed development (with comparisons to the current impressions) show a full and accurate visual depiction of the proposal. In all images the height and size of the buildings are cut out of the images to detract from their size, with the images instead focusing on the street or surrounding buildings. This depiction clearly has been provided to detract from their size so out of character with the surrounding area. These images should. Be a more accurate reflection of the changing landscape and should clearly demonstrate where building will occupy space which is currently open sky.

3. The small surrounding streets do not have the capacity to support such a large development. Contrary to the report which implies that the traffic generated can be accommodated with the existing road network, this is not correct. The immediate streets inclusive of Cecily and Fred Streets would have great difficulty accommodating the traffic that would occur from such a large number of residents, businesses, customers etc coming and going. The streets already have congestion & stoppages at busy periods with the current traffic. There is little off street parking in the area necessitating tightly congested street parking. This means that traffic is frequently reduced to one way flow with vehicles having to pull to the side and negotiate with oncoming traffic to determine who has right of way, and who will pass first. Again, with hundreds of new residents additional to the tight use of the streets, this will become increasingly difficultly to negotiate.

The traffic impact report indicates traffic flow of 50-70 vehicles per hour, two-way. However, this two-way flow is already not possible.

Of further concerns is of course the increased noise that would be generated for the existing residents from such a large increase in traffic flowing in and out of the currently quiet surrounding streets.

It would be essential for consideration to be given to how traffic could flow directly on/off Balmain Road rather than the smaller side streets to minimise the traffic, noise and congestion this would cause, although again, with such a large number of vehicles this would likely then impact the traffic flow on Balmain Road itself.

██████████ be impacted in the near future with more traffic flow due to the proposed cycle way development on Lilyfield road which will reduce the traffic flow on Lilyfield road thus pushing more vehicles up Cecily Street to exit at the traffic lights, as well as the impact of Westconnex as cars navigate this cut through to the traffic lights to avoid Westconnex and toll roads.

This is a very small set of traffic lights with an already tight turning circle which often sees vehicles have to reverse back if a large vehicle/truck is trying to turn into Cecily street at the traffic lights. When more than a couple of vehicles are at the lights waiting to turn out of Cecily street this becomes impossible and can create considerable delay as large vehicles attempt to navigate the tight corner. Again, this tight intersection will be compromised by increased traffic flow.

The traffic lights at Cecily street do not even have a pedestrian light, so pedestrians cross this road in front of vehicles at their own discretion/risk. With the large traffic increase proposed, there is much greater risk to pedestrians crossing Cecily street, many of whom are families with prams, kids on bikes and/or dogs.

5. Street parking in the immediate area is already a problem as the majority of properties do not have off street parking. There is not nearly enough space for the existing residents, business and their customers, delivery trucks etc. The proposal is intentionally vague about the parking that will be incorporated. However, it will certainly be insufficient for the number of units proposed as well as the businesses, delivery vehicles etc and this will overflow into street parking which simply does not exist. This will not only impact the new development, but will also have a significant negative impact on the existing residents and businesses.

6. Loading areas are described as being in the basement of the building. This will of course reduce the parking which will be available in the basement. However, this also does not address the issue that the vehicles using the loading facilities will still require entry and exit into the existing congested street network, which will further add challenges with large vehicles, small turning circles and the associated noise generated from such vehicles.

7. A large unit complex such as this one proposed will of course draw many more young families into the area. The proximate schools in the area (Orange Grove Public & Rozelle Public Schools) are already overly populated and have difficulty accommodating the children of the existing community. These schools (namely Orange Grove as the development is zoned to Orange Grove) will not have the capacity to absorb so many more children with their current infrastructure, again impacting not only the residents of the new unit complex, but negatively impact in the existing residents. The proposal has made an assumption that families will have to resort to paying to enrol their children in independent schools which is an inappropriate assumption as all should be entitled to public school education.

8. The solar analysis is misleading about the true impact this large scale development will have for existing residents. The analysis intentionally explores only 0900-1500hrs, which indicated that only minor overshadowing will occur. However, after 1500hrs but still within daylight hours there will be considerable overshadowing to residents that does not currently exist. Specifically, this overshadowing will occur in the late afternoon, early evening which is the time of day most often enjoyed for open space & solar exposure. Whilst 'legally' these homes may receive adequate solar exposure. The report does not fairly demonstrate the loss of solar exposure.

9. There has been no consideration given to privacy for existing residents, having large numbers of units looking directly down into their currently very private properties.

In summary, whilst this proposed redevelopment does have its merits, it is an incredibly large development aimed at making large profits for the owners and developers. It will have multiple negative impacts on the existing tight space and this the currently business users as well as the local residents. A smaller scale redevelopment should be considered, to be able to better assimilate with the current community, as well as being able to genuinely not impact the existing infrastructure.

Looking forward to hearing more about this development proposal.



Sent from my iPad



To whom it may Concern,

I wish to lodge my objection to the development proposal at 469-483 Balmain Road Lilyfield.

As a resident of Cecily St Lilyfield, residing close to the intersections of both Fred St and Cecily St, as well as Cecily St and Balmain Road, I strongly object to this development.

After examining all submitted documents the most concerning objection I have is the inadequate allocation of parking provided by the development. The Proposal states that 15 parking spaces will be allocated in the basement carpark, however, their traffic report has outlined that a minimum of 114 and a maximum of 182 car spaces are required for this development, due to the majority of “employees” servicing the businesses on the ground floor traveling to work by car.

This allocation of car spaces is grossly inadequate and quite frankly absurd.

This lack of car spacing will impact resident parking on Fred and Cecily St as it is UNMETERED parking. I foresee extreme parking difficulties for the residents of these streets as the majority of residences have NO OFF STREET PARKING.

I also object to the height of the development. It is extremely out of place with the present buildings on both Balmain road and Fred St.

And finally, I object to the development on the basis that it will significantly impact traffic at the intersection of Cecily St and Balmain road. This intersection is already busy with not only car traffic but also pedestrian traffic at peak hour and a development of this size will make this intersection unbearable for current residents.



[REDACTED]

To whom it may concern.

[REDACTED]

I support the proposal but conditionally. Could you please provide further details on the following:

My questions are in regard to the 'Urban Design Report (dated May 2019)'

Page 5:

It states that they proposal supports an FSR of 2.54:1 and a range of heights from one to six/seven storeys at a maximum height of 23m.

Could you please confirm if this is 6 or 7 stories?

Page 27:

It says 'Fred St will be subject to street improvements enhancing the pedestrian experience & creating a pedestrian link between Fred and Alberto Sts'.

Where exactly will this be coming into Alberto St?

Page 64:

Is there changed pedestrian means across Balmain Rd / Alberto St?

Currently there are blind spots if existing Alberto St.

Page 66: Alberto St

1) Where exactly in this proposal do the cars enter or exit the building? Is it currently where the disused car park is?

2) Is this an entry or exit point into the building?

3) How many entry / exit lanes is this into the building?

4) What will the impact be to the residents that are opposite this entry / exit point?

5) it says that pedestrian access will be better, & that the footpath will be widen, is this the case?

Also, I have attached the 'political donations disclosure statement' as required.

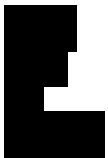
Thank you in advance and I look forward to your reply.

Yours sincerely,

[REDACTED]

0424 959 886

This email and any attachments may be confidential and contain privileged information. It is intended for the addressee only. If you are not the intended recipient you must not use, disclose, copy or distribute this communication. Confidentiality or privilege are not waived or lost by reason of the mistaken delivery to you. If you have received this message in error, please delete and notify the sender.



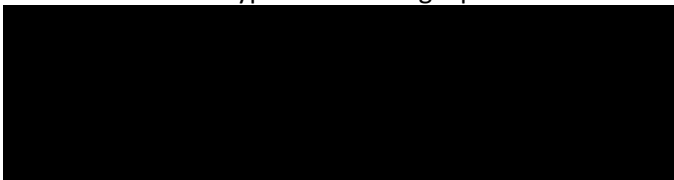
From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 12:51 PM
To: DPE PS ePlanning Mailbox <ePlanning@planning.nsw.gov.au>
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Fri, 25/10/2019 - 12:50

Submitted by: Anonymous

Submitted values are:

Submission Type: I am making a personal submission



Submission file: [webform_submission:values:submission_file]

Submission: I hereby lodge my objection to the proposed rezoning and overdevelopment of this site taking the following into consideration: The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity. The current transport and NBN infrastructure is not adequate to accommodate this increase in occupation.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

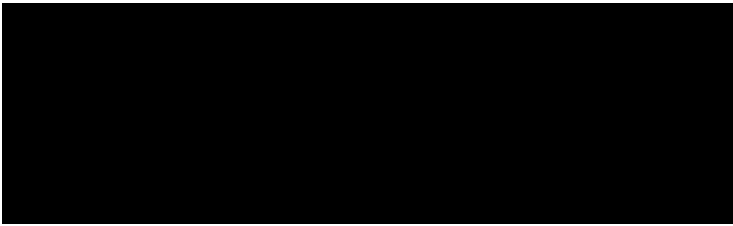
Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 12:51 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Fri, 25/10/2019 - 12:50

Submitted by: Anonymous

Submitted values are:



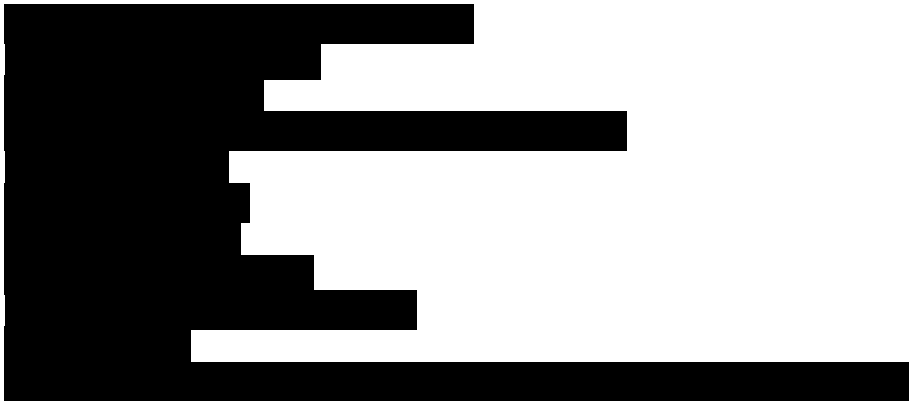
on_file]

Submission: I hearby lodge my objection to the proposed rezoning and overdevelopment of this site taking the following into consideration: The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity. The current transport and NBN infrastructure is not adequate to accommodate this increase in occupation.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 12:00 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



Submission: To whom it may concern, I am writing to you regarding the development of 469-483 Balmain Rd [REDACTED] you know this is a stone's throw from the proposed development. As a current resident of Cecily Street, and shortly moving house to 463 Balmain Road (four doors away from the proposed development) in 3 months time, we are very aware of the area, and the current benefits and challenges faced by residents, visitors and through traffic (both vehicular and pedestrian). We as a family agree that there will be some benefits to the area with an appropriate development of this nature, yet we think that there are aspects of this proposal that have not been fully considered and will have a detrimental effect to the area, the existing residents and the prospective residents and businesses to take occupation of this new development. *

HEIGHT ~ 6 storey structure would overwhelm the area which is of mainly 2 storey structures (with the exception of 465 Balmain Road, which is widely regarded in the area as an eyesore), and it would impact and shadow a large number of surrounding properties. * PARKING ~ The number of proposed apartments would overwhelm the surrounding infrastructure, (roads, schools, public transport) one road which is already is stressed, particularly Cecily street which is almost a single lane when there are cars parked as is often the case due to a lack of off-street parking. I refer to the traffic report (Appendix_B_-_Traffic_Report.pdf) and specifically points 2.14, 2.16 & 2.18, where it states in summary there will be a requirement for 229 car parking spaces (for residents and employees of the site) yet the proposal is to provide between 114 and 182 car parking spaces, potentially creating a shortfall of 115 cars requiring parking in this vicinity. Where are they going to park? Does the developers know of 115 secret parking spaces in the immediate vicinity??, because as a resident of over 3 years I can validate that there is not enough parking for the existing residents of most streets in the immediate area and this is going to be an obvious issue. Are there any proposed plans to have parking meters installed with a resident permit system? What is the plan regarding council rangers patrolling this area, and what additional resources are being put in place to enable them to do this (as with existing resources this simply becomes an additional strain on their time, so additional council rangers would need to be employed, is this factored into the planning stage)? * CONSTRUCTION PARKING ~ What arrangements are being made for the transport of site construction workers using carpool /private buses to and from the site / public transport during the site construction phase of this development? We have already seen the effects of the Westconnex site worker parking issues (promises for onsite parking and then reneged). *

COMMUNITY SPACE ~ What portion of the building area is being allocated to developing artists, community spaces, not-for-profit organisations? Are there any grants /incentives/requirements to apportion some of this new space back to the community and without making it a commercial arrangement for money (i.e. for little or no money to do so). Considering a portion of the existing buildings have been utilised by artists, etc. from the perspective of giving back to the community I would like to see some tangible efforts made regarding this. I do appreciate the opportunity to be a part of the consultation process and hope that the sentiments and opinions of those sought are truly valued, considered, and where appropriate that suitable action is taken from the community and

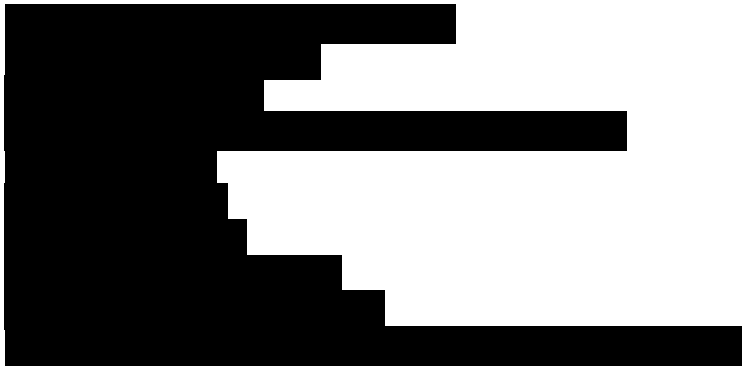
environmental perspective. I am happy should you wish to contact me further for additional comments, explanation

[REDACTED]

[REDACTED]

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Saturday, 26 October 2019 9:59 AM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

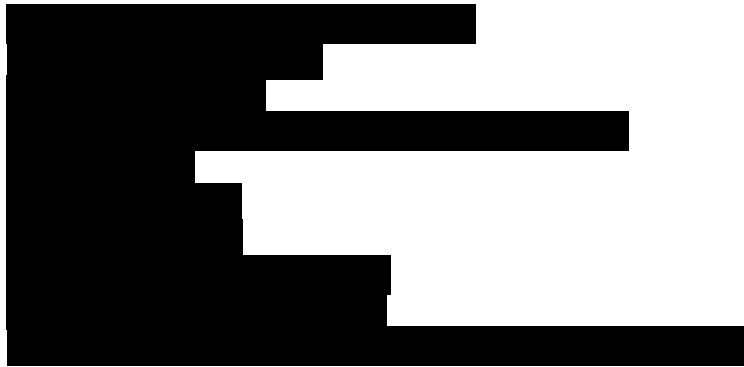


Submission: As a local business , I can confirm the loss of a huge amount of employment lands and industrial space in the area. My own business is to be evicted due to apartment development and we cannot find a building to relocate. Constant rezoning like this has let to developer speculation forcing up rents and land prices. These developers are willing to leave sites vacant to prove their point that the sites cannot be viable for light industry /bulky goods . But this is a lie. The area is crying out for these sites and the building of West Connex has only exasperated this issue , as they bought many industrial sites and demolished them. If you are to rezone as per the draft the ground floor ceiling heights must be 6m internally ! A business cannot work without this height. This relates to truck and container deliveries and efficient use of the space with pallet racking etc . It can also be mezzanined for offices above showrooms etc , and later returned to a clear space. This allows these spaces to be integrated rather on separate levels and not interfere with the residential amenity. It would also allow for a range floor plates for business. Successful local business need large floor plates , 500 to 1500m2 . And you must not allow use that don't employ people ! This means storage centres and church. These uses do not activate the area as they dont have staff and are closed for most of the time On the issue of the amount of apartments our area lacks facilities. our schools and daycare capacity are maxxied out as are our roads. The area does not have the capacity for this level of residents considering all the other development in the area

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 8:23 AM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

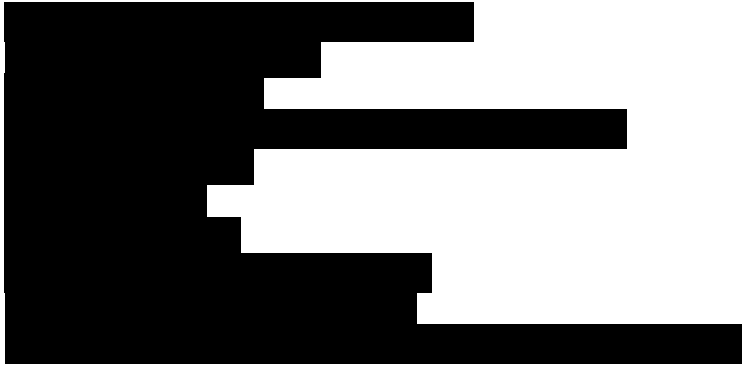


Submission: Dear Submission panel, I am writing to you in relation to the development of 469-483 Balmain Rd (Development). [REDACTED] block from the proposed development. Having lived in the area for a number of years, it is clear that a development of a suitable nature would be of a benefit. However, having reviewed the specifics of the Development, including the number of apartments proposed, height of the structure, (6 storey) and the number of additional parking spaces compared with the number of apartments which will be available to residents it is clear that insufficient planning and thought has gone into the proposal is both out of step with the area and insufficient so as to not to materially impact the surrounding residents and infrastructure. My and my families and my surrounding neighbours objections are as follows: - 6 storey structure would overwhelm the area which is of mainly 2 storey structures, it would impact and shadow a large number of surrounding properties. - The number of proposed apartments would overwhelm the surrounding infrastructure, (roads, schools, public transport) one road which is already is stressed, particularly Cecily street which is almost a single lane when there are cars parked as is often the case due to a lack of off street parking - Insufficient parking for the residents and their guests, already the surrounding streets do not have enough space to park cars on our own street with near by businesses and so additional density as proposed would worsen this situation. [REDACTED]

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 3:41 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



Submission: The Social Impact Assessment by Hill PDA states clearly that Orange Grove Primary School is at 164% capacity. Yet Orange Grove is the closest primary school that would have to accomodate extra 18 pupils. Last year OG primary school extended its capacity by placing mobile cabins on playgrounds, reducing outdoor and play areas. It has no indoor assembly facility either. It is massively overstretched. Orange Grove cannot absorb more children and the planning application for 469-483 Balmain Road, Lilyfield must be made subject to additional built classrooms, teaching staff and assembly space at Orange Grove or an additional new primary school in Lilyfield/Rozelle. Further, the Light Railway at Lilyfield is routinely at capacity and commuters have to wait several trains before boarding in the mornings. The intersection for car commuters at Lilyfield road with Mary Street is completely blocked during rush hours due to lack of options for widening. so, additionally to educational infrastructure, also the transport infrastructure is not able to cope with an above average increase of population at this point in Lilyfield - even if it was desirable to provide more housing stock. Infrastructure first, then densification. Regards

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 9:20 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

[REDACTED]

[REDACTED]

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Planning Proposal # : PP_2017_IWEST_018_00
Planning Refn : 2017SCL068

11 Oct 2019

RE: Planning Proposal: 469-483 Balmain Road Lilyfield

Dear Planning Panel,

I attach a submission regarding rezoning and redevelopment proposed at the Roche Site, 469-483 Balmain Road Lilyfield. The proposal has merit and the improved permeability (Fred St – to Alberto), improvement to the public domain interface and the retention of art and employment spaces are to be commended.

I support the proposal *but conditionally* because:

- the traffic report is currently incorrect regarding Alberto Street / Balmain road intersection (and ease of exiting Alberto Street to turn East) (further detail below)
- the scale of the site in terms of height and ‘whole block’ redevelopment is very well suited to a strong ‘ESD’ / environmental design response but the proponent’s documentation (see Table 1) currently couches its sustainability commitment in the familiar language of ‘will be considered’, ‘is proposed’ and ‘is intended’, leaving space for subsequent dilution of design in terms of environmental performance.

Typical language in the planning proposal and the urban design report

P 30 “It is proposed to explore a number of sustainability measures through the development of the Site such as solar panels, green roofs and walls, water harvesting, urban agriculture, and the use of natural ventilation where possible”

“It is intended that the project will explore sustainability and amenity features during the DA stage such as green roofs, walls and water efficiency measures.”

Planning Panels should be strongly guided by the Greater Sydney Commission’s and Eastern District Plan’s emphasis on lifting the carbon (energy efficiency) and water conservation performance of new development. The wording in the draft DCP document is exceptionally weak in this regard. I urge the Panel to lock in clear environmental commitments and I provide information below regarding, specifically, the site’s potential for on-site renewable energy as well as other environmental design opportunities. Table 2 provides an opportunity for the proponent to be much more explicit about their commitment to sustainability in design. Knowing the local community values it is reasonable to expect residential investors in the development to be looking for sustainability features in the design.

Submission detail follows below covering design for environmental performance, site contamination,

1 Design for Environmental Performance / ESD

Planning proposals are commonly accompanied by ESD / environmental design type reports describing how proposed development will deliver environmental outcomes typically above minimum mandatory

standards due to the opportunity presented by precinct-scale or whole urban block redevelopment compared to more constrained single lot/smaller site development.

The fact there is no ESD report for this site *is not an issue* but the proponent moots proactivity in at least three aspects (renewable energy generation, rainwater harvesting and urban greening) that warrant securing via specific LEP and DCP clauses to ensure the proponent really does deliver good environmental design and strong post occupancy environmental performance. All the more so as the VPA does not currently address environmental performance which is actually a *public benefit* matter (e.g. in terms for example of stormwater discharge quality, water conservation, urban greening and greenhouse gas emission abatement).

Table 1 below identifies seven (7) references to design for sustainability in the Planning Proposal document, so the proponent apparently intends to 'deliver', but note that the language is often couched in phrases such as "will consider" "it is proposed", and "it is intended". This a classic method of enabling subsequent watering down of environmental performance post-approval and the Planning Panel, in keeping with all the recently adopted strategic positions on sustainability (Greater Sydney Plan, Eastern Sydney District Plan, Inner West Community Strategic Plan) , should act to ensure the site's clear opportunity for: renewable energy generation, stormwater harvesting and climate change resilience through increased canopy cover are captured by specific approval clauses.

Further with extensive demolition proposed the proponent must commit to meet or exceed waste to landfill targets for demolition materials and the demolition and construction waste management plan must specify which bulk materials will be recovered for recycling, or re-use on site.

References in the planning proposal to "urban agriculture" feel somewhat glib when not supported by any spatial commitment to, for example, community garden areas in readily accessible locations with good solar access. Thus the indicative roof top garden areas indicated on page 20 of the Urban Design report by Art Haus needs to be referenced in any scheme approval to ensure delivery for real. Further, is there proposed to be any more publicly accessible community garden space (i.e. not roof top) within the site area?

Reference in the Planning Proposal to "natural ventilation "where possible" is also somewhat meaningless as currently expressed. Development at this scale can readily have natural ventilation built into the design for residential, retail, art and commercial spaces, and it *should* be designed in – residents and tenants would expect nothing less. While air conditioning for some spaces is of course anticipated, this is no reason to decline opportunities for designing in natural ventilation (surely this is simply about having operable windows).

1.1 On Site renewable energy opportunity - what would 'good' look like?

The most obvious, cost effective and also highly marketable sustainability 'element' would be to install approx. 0.5 to 0.75 Kilowatt peak of solar power (i.e. a photovoltaic system) *per dwelling* (i.e 70 kWp to 110 kWp in total) on the development's roof tops .

P.v. installation will significantly improve the development's BASIX energy score Note that the Dept of Planning, via its [Urban Growth Strategy for Parramatta Road](#) (page 11 and other supporting documents) identifies that BASIX energy target of 40 is entirely appropriate for this scale of development proposed at Balmain Road. i.e. the Department has already endorsed the reasonableness of this target in its own published material

The power generated from such a system is best directed to apartment common area loads and any surplus directed to art studio space before surplus export to the grid. Page 20 of the Urban Design Report by Art

Haus indicates inclusion of solar energy systems in the design but without the Planning Panel locking in a per dwelling minima as part of the rezoning approval or the accompanying VPA *there is every chance that the final design will have only cosmetic (i.e. insignificant) on site renewable energy generation.*

1.2 Tightening ESD commitments

Table 2 provides advice on other cost effective environmental sustainability measures and is not at odds with the Design Report but seeks to express outcomes in clearer ways.

In lieu of requiring an ESD report the consent authority is strongly encouraged to seek proponent's responses to the good design measures described in column 2 by nominating their commitments in column 3.

The current wording regarding design for sustainability in the draft DCP (section 3.8 page 15) is currently very weak and needs tightening to ensure delivery of reasonable sustainability outcomes. By tightening here meaning specific reference to a numerical solar p.v capacity.

The Art Haus diagram on page 20 of the urban design report features a 'bio cleansing' tank which appears to be within the street /beneath public footpath rather than within the site boundary. Is council aware of this proposal and is the "bio-cleansing" feature actually just a GPT ? if so, a gilded lily is not required.

Table 1 – Proponent's specific references to delivering environmental sustainability outcomes on site

References to design for sustainability in the Planning Proposal	Proponent's commentary – note where italicised, proponent uses phrases that enable subsequent non delivery of sustainability outcomes on the site
P 18 "the Site is located in a high demand area with good access to social and physical infrastructure and as such represents a sustainable and economically efficient option ..."	
P 18 acknowledges <i>Greater Sydney Plan</i> (GSP)	..."directions, objectives and actions to achieve the 40-year vision which are focused around infrastructure and collaboration, liveability, productivity and sustainability"
P 19: In response to <i>GSP Direction 9</i> , Objective 34: Energy and water flows are captured, used and reused - This objective supports initiatives to increase renewable energy generation and energy and water efficiency	" <i>It is proposed</i> to explore a number of sustainability measures through the development of the Site including solar panels, water harvesting, urban agriculture, and the use of natural ventilation where possible."
P23: In response to <i>Our Inner West 2036 Community Strategic Plan</i> - Strategic Direction 1: An ecologically sustainable Inner West	"The Proposal supports this strategic direction by <i>identifying opportunities</i> for sustainability initiatives including solar panels, water harvesting, urban agriculture, and the use of natural ventilation <i>where possible</i> . The Proposal will also provide increased tree canopy cover and landscaping including additional street trees and landscaped communal courtyards"

P 26 overview of the PP, section 5.1 Urban design response	<i>"It is intended that the project will explore sustainability and amenity features during the DA stage such as green roofs, walls and water efficiency measures."</i>
P30 under "Analysis against previous design principles for the Site - Principle 9 – Ecologically sustainable development	<i>"It is proposed to explore a number of sustainability measures through the development of the Site such as solar panels, green roofs and walls, water harvesting, urban agriculture, and the use of natural ventilation where possible"</i>
P 55	<i>"The original proposal had a number of community benefits that have been retained in the Proposal, including a through site link and widened footpaths, retention of the character buildings facing Balmain Road and incorporation of sustainability features."</i>

2 Site contamination – Asbestos and Contaminated Soil management

Has site has full asbestos assessment yet and if not when?

Dust suppression during demolition is essential given diverse industrial history. While dust suppression will be a standard DA consent condition consent authorities and proponent must be aware of and respond appropriately not just to the extensive accumulated dust from industrial era (air borne pollutants from two nearby former power stations) and lead dust from previous era of leaded petrol as standard fuel for over half a century.

Even if building was not constructed or modified with asbestos building elements there will be abundant imported dust from past 60 years in cavities, eaves and roof spaces so effective dust control is essential during any demolition phase.

3 Traffic Management

Page 30 of the planning proposal notes that principle 6 of the previously established design principles states "Ingress and egress should be encouraged from Balmain Road or to be equitably distributed across the Site." *This does not seem to be reflected in the apparent main ingress/egress proposal (Alberto St) indicated on p 44 of the Planning Proposal document.* Further this exit point may generate excessive night time light annoyance (from vehicle headlights) to the residents living at the corner of Maida Street and Alberto Street as vehicles head up the exit ramp onto Alberto Street. Likewise Fred Street residences opposite that site driveway.

Page 14 item 2.4 of Colston Budd Traffic Study states that vehicles waiting to turn right from Alberto Street into Balmain Road are able to 'see through' vehicles parked on Balmain Road to facilitate safe turning onto the main road. ***This statement is not correct*** regarding the ease of turning east out of Alberto Street. Commonly commercial vehicles (vans, minibuses, trucks) parked in the parking lane just east of Alberto Street, being larger than parked cars, *do often obstruct visibility making turning toward Rozelle hazardous.*

A paring back of the allowed parking on the Balmain Road westbound carriageway by two spaces would significantly improve the view lines and should be a design measure implemented by Inner West Council in conjunction with the redevelopment. A rain garden combined with a car share space restricted to cars not vans could effectively improve sight lines and make traffic movements safer.

Summary:

I would hope that the Planning Panel and then the Inner West Council would show commitment to the GSC and Eastern District Plan objectives relating to sustainability and embed environmental performance requirements into development consent.

[REDACTED]

[REDACTED]

THE UNIVERSITY OF CHICAGO
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For more information



Office use only:

Date received: _____ Planning application no. _____

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application or a public submission to the Minister or the Director-General

Under section 147(3) of the *Environmental Planning and Assessment Act 1979* ('the Act') a person:

- (a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any person with a *financial interest* in the application, or
- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any associate of that person.

How and when do you make a disclosure?

The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

- (a) in, or in a statement accompanying, the *relevant planning application* or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the *relevant planning application* or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?

The information requirements of a disclosure or *reportable political donations* are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1987* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

gift means a gift within the meaning of Part 8 of the *Election Funding and Disclosures Act 1987*. Note: A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of the *Election Funding and Disclosures Act 1987* gift is defined as follows:

gift means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

- a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
- b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
- c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
- d) an application for development consent under Part 4 (or for the modification of a development consent), or
- e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a *relevant planning application*, but does not include:

- f) an application for (or for the modification of) a complying development certificate, or
- g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
- h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a *relevant planning application* or any development that would be authorised by the granting of the application.

reportable political donation means a *reportable political donation* within the meaning of Part 6 of the *Election Funding and Disclosures Act 1987* that is required to be disclosed under that Part. Note: *Reportable political donations* include those of or above \$1,000.

Note: Under section 86 of the *Election Funding and Disclosures Act 1987* *reportable political donation* is defined as follows:

86 Meaning of "reportable political donation"

(1) For the purposes of this Act, a *reportable political donation* is:

- (a) in the case of disclosures under this Part by a party, elected member, group or candidate—a political donation of or exceeding \$1,000 made to or for the benefit of the party, elected member, group or candidate, or
- (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding \$1,000:
 - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
 - (ii) made by the major political donor.
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a *reportable political donation* if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a *reportable political donation* under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a *reportable political donation* if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a *reportable political donation* under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
- (4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

a person has a financial interest in a *relevant planning application* if:

- a) the person is the applicant or the person on whose behalf the application is made, or
- b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it,
- c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if the application is authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- d) the person has any other interest, relating to the application, the site or the owner of the site that is prescribed by the regulations.

persons are associated with each other if:

- a) they carry on a business together in connection with the *relevant planning application* (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a *relevant planning application*), or
- b) they are related bodies corporate under the *Corporations Act 2003* of the Commonwealth, or
- c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- d) they have any other relationship prescribed by the regulations.

Table 2 PP_2017_IWEST_018_00 ESD Template for Building Design & Construction Proposal – 469-483 Balmain Road Lilyfield

<i>Aspect of Environmental Design</i>	<i>Examples of effective initiatives / design objectives</i>	<i>Proponent's response for this development • Reference numeric outcomes wherever possible; avoid using narrative text</i>
Greenhouse gas emissions abatement including energy efficiency initiatives	• BASIX scores above state mandated targets – BASIX Energy 40 for apartments of circa 6-7 storeys readily achievable • LED lighting as standard / dominant lighting type • Highly efficient HVAC equipment (high CoP / high star ratings) • Employment of heat pump and solar energy solutions • Building Management Control Systems for energy efficiency • Commitment to HVAC commissioning	• Typically will cross reference to BASIX Energy score - Indicate energy efficiency design measures proposed for inclusion for : • Lighting • HVAC • Appliances • Water Heating
Passive design for thermal comfort, ahead of reliance upon mechanical air conditioning solutions	• Effective shading for solar exposed glazing • High performance glass – Double glazing for most shaded apartments (sth west aspect) to retain heat in winter, • Additional insulation (R Value) for top floor apartments with roof directly above • Use of thermal stacking &/or cross-ventilation in design	• Typically will cross reference to BASIX Thermal Comfort settings • Explicitly state inclusions / design components that address passive design to deliver internal comfort before reliance on air conditioning
Renewable energy generation & energy storage initiatives	• Inclusion of photovoltaic (p.v.) system(s) – a system size equating 0.5 to 0.75 kWp per dwelling (70 to 110 kWp) is considered appropriate given roof space and accounting for communal area allocation indicated on p6 of Arch. Design Report, & roof plan • Must be <u>shown on plans at detailed design stage</u> • Solar or heat pump water heating	• State proposed kilowatt peak capacity of any photovoltaic system(s). Site can readily accommodate 0.5 to 0.75 kWp <i>per dwelling</i> without impinging on communal roof top space • State capacity and predicted energy uses of any battery storage proposed • State if solar or heat pump water heating is proposed for domestic hot water in place of gas
Design for climate resilience	• Design for extreme rainfall events; inclusion of ground level external shade structures for respite from extreme heat; materials selection cognisant of extreme heat; drought tolerant landscaping; design buildings/spaces to cope adequately under extended heatwave conditions	• CSIRO predictions for Sydney CBD: More frequent days over 35 degrees, more powerful storm events (stronger wind gusts, heavier rainfall), extended periods of drought, more frequent heatwave events. • Has this development proposal sought to address these known impacts of climate change?
Mains potable water savings / water efficiency initiatives	• BASIX Water score above state mandated targets. BASIX Water 45 considered appropriate • On-site rain/stormwater capture & storage • Sub-metering to enable effective water usage monitoring • Re-use of captured water for irrigation and ideally within buildings (toilet flushing)	• Typically will cross reference to BASIX Water commitments • Has water use been modelled for operational phase? Key end uses identified and efficiency measures designed-in for those uses? • Storage capacity (in kilolitres) of any on-site rain/stormwater retention tanks • Nominate end-uses for harvested water – toilet flushing & laundry uses appropriate as well as irrigation

	• Fire test water retention • High star-rated fixtures and appliances	•
Stormwater management: quality & quantity	• Stormwater harvesting solutions, with on-site re-use • Bio-filtration, swale and other WSUD solutions • Treatment methods designed to scale	• What is the actual intent the bio-cleansing icon in the Urban Design Report ? • Typically will cross reference to hydraulic engineers report & Council's DCP 2012 targets • Summarise on-site storage capacity, treatment trains
Demolition and Construction-phase resource recovery, materials re-use, recycling	• Any Innovation in materials recovery/re-use • Retention of existing materials for onsite reuse • Clear % targets for waste directed away from landfill • Environmentally certified timbers for structural timber elements - Forest Stewardship Council certification preferred	• Any innovation in construction materials - esp re: Concrete methods • Will project commit to certified timber for 95% of timber used? • Typically will cross reference to Waste Management Plan (WMP) • What proportion of demolition waste will be diverted from land fill?
Operational-phase waste reduction, resource recovery, recycling	• Provision of well-designed, accessible waste and recycling storage facilities that are adaptable to suit future changes in separation and collection regimes • Provision of on-site composting facilities	• Typically will cross reference to Waste Management Plan and DCP waste and recycling requirements
Biodiversity protection and/or enhancement, City greening	• Select native species endemic to the locale • Inclusion of adequate deep planting zones	• Typically will cross reference to Landscape Code, landscape plan, arborist report and/or fauna/flora impact assessment • Canopy cover (when mature) expressed as a percentage of total site area
End of Trip facilities and promotion of active and public transport	• On site bicycle parking provision – must be shown on plans – staff and visitor allocations • Provision of Travel Plan as per City website	• How many bicycle parking spaces are proposed • Summarise any End-of-Trip facilities for retail staff • Summarise proximity (distance in metres plus walk time) to train services
Planning & Rating Tools	proponents should confirm the BASIX score being targeted	
Residential apartments	• Subject site can readily achieve BASIX Water 45 and Energy 40 appropriate and readily achievable for development at the scale proposed for	• BASIX Energy score targeted: 40 or higher -achieved in part by renewable energy system • BASIX Water score targeted: 45 or higher • Note DA Plans at detailed DA stage MUST physically show/state BASIX commitments as per BASIX regulations in EPAA.

Kim Holt

Sent: [REDACTED]
To: [REDACTED]
Subject: Monday, 28 October 2019 9:15 PM
Plan Comment Mailbox
469-483 Balmain Rd

I would like to submit my total objection to the Over development proposed for 469-483 Balmain Rd, Lilyfield. It is completely out of character with the area and must not set a precedent. Over development with greed in mind as usual.

Please register my complete objection.

[REDACTED]
[REDACTED]

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 10:21 AM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Mon, 28/10/2019 - 10:20

Submitted by: Anonymous

Submitted values are:

Submission Type:I am making a personal submission

First Name: [REDACTED]

Last [REDACTED]

[REDACTED]submission_file]

Submission: A large development of this size is out of character for the area. The traffic in and around this site is terrible and the area simply cannot sustain a development of this scale. There is insufficient parking in the proposal and these extra cars will choke the streets even further. This will open the flood gates for developments throughout the suburb and it is not sustainable. The local schools are over capacity and this will increase the potential enrollments. Six storeys and that high number of residences is far to high and to many.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 6:00 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Mon, 28/10/2019 - 18:00

Submitted by: Anonymous

Submitted values are:



Submission file: [webform_submission:values:submission_file]

Submission: New proposal is for a 6 storey building covering whole site with 142 residential apartments (1-3 bedrooms) and light commercial businesses. This will have significant impact on Orange Grove Public School which is currently at 164% of capacity, as a residential site this large has the capacity to generate an additional 100 primary age children who would be zoned for Orange Grove School In addition there is no green space provision and reliance on Callan Park Significant overshadowing, overlooking on existing residences There is no provision for parking for the additional 488 cars that this building will create Significant impact on local traffic flow There is also significant impact on other amenities such as NBN and public transport. Significant social impact of high density 142 residences on site to local area - Very out of character.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 8:05 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Mon, 28/10/2019 - 20:05

Submitted by: Anonymous



Submission: I object to this development on the basis that it is not keeping with the local architecture and builds. The sheer bulk and scale of this should not become precedent for future builds. I believe with westconnex dominating at the moment our small suburb is going through enough

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>



NSW Government Planning Panels

By email: PlanComment@planningpanels.nsw.gov.au

28 October 2019

Planning Proposal #: PP_2017_IWEST_018_00
Planning Ref: 2017SCL068

RE: Planning Proposal: 469-483 Balmain Road Lilyfield

Dear Planning Panel,

Please find below a submission regarding rezoning and redevelopment proposed at the Roche Site, 469-483 Balmain Road Lilyfield. The proposal has merit and the improved permeability (Fred St – to Alberto), improvement to the public domain interface and the retention of art and employment spaces are commendable.

We support the proposal **but conditionally** for the following reasons:

1. Traffic Management:

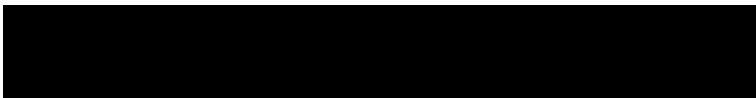
- As long-term residents we believe the traffic report is currently incorrect regarding Alberto Street / Balmain road intersection (and ease of exiting Alberto Street to turn East) (as below):
- Page 30 of the planning proposal notes that principle 6 of the previously established design principles states *"Ingress and egress should be encouraged from Balmain Road or to be equitably distributed across the Site."* This does not seem to be reflected in the Alberto Street ingress/egress proposal indicated on p 44 of the Planning Proposal document. Further this (single?) exit point may generate excessive night time light annoyance (from vehicle headlights) to the residents living at the corner of Maida Street and Alberto street as vehicles head up the exit ramp onto Alberto street.
- Page 14 item 2.4 of Colston Budd Traffic Study states that vehicles waiting to turn right from Alberto Street into Balmain Road are able to 'see through' vehicles parked on Balmain Road to facilitate safe turning onto the main road. This statement is not correct regarding the ease of turning east out of Alberto Street. Commonly commercial vehicles (vans, minibuses, trucks) parked in the parking lane just east of Alberto Street, being larger than parked cars, do often obstruct visibility making turning toward Rozelle hazardous.
- A paring back of the allowed parking on the Balmain Road westbound carriageway by two spaces would significantly improve the view lines and should be a design measure implemented by Inner West Council in conjunction with the redevelopment. A rain garden combined with a car share space restricted to cars not vans could effectively improve sight lines and make traffic movements safer.

- We seek greater consideration of one-way car park entry from Alberto St to reduce risk for flow of vehicles waiting to turn right onto Balmain Road towards Rozelle; with potential for safe exit from Fred/Cecily Streets where there is a set of traffic lights for the right-hand turn to Balmain Road.
2. Site contamination – Asbestos and Contaminated Soil management:
- Has site has full asbestos assessment yet and if not when?
 - Dust suppression during demolition is essential given diverse industrial history. While dust suppression will be a standard DA consent condition consent authorities and proponent must be aware of and respond appropriately not just to the extensive accumulated dust from industrial era (air borne pollutants from two nearby former power stations) and lead dust from previous era of leaded petrol as standard fuel for over half a century.
 - Even if building was not constructed or modified with asbestos building elements there will be abundant imported dust from past 60 years in cavities, eaves and roof spaces so effective dust control is essential during any demolition phase.

In summary:

We would hope that the Planning Panel and then the Inner West Council would show commitment to the GSC and Eastern District Plan objectives relating to sustainability and embed environmental performance requirements into development consent.

Yours sincerely

A solid black rectangular box used to redact the signature and name of the sender.

28th October 2019

Planning Panels Secretariat
GPO Box 39
Sydney NSW 2001

email: PlanComment@planningpanels.nsw.gov.au

Dear Committee members

PLANNING PROPOSAL SUBMISSION

NOTICE OF OBJECTION TO PLANNING PROPOSAL FOR 469-483 BALMAIN ROAD, LILYFIELD.

Reference 2017SCL068 - Inner West – PP_2017_IWEST_018_00

I strongly object to the above proposal on numerous grounds. I would be more than be happy to elaborate further if required.

1. DESIGN AND STREET SCAPE

The proposed development for a 6-storey light industrial and residential block directly adjoining my property is offensive in its sheer size and scale. Should permission be granted to the developer's proposal the impact upon my property will be immense and drastically affect my family's standard of living and value of my property.

Like many of the other residents in the surrounding area we chose to buy into this suburb for its unique historic character.

A proposal of this magnitude would be completely out of character for this area and in vast contradiction to the average 1-2 story freestanding homes, duplexes and terraces that surround it.

This proposal is neither in keeping with the local area streetscape or character of the neighbourhood. There are no buildings of a similar size or density in the local area, so this development would be a significant and unwelcome precedent to set.

To make things even worse the proposed development is situated at the top of the hill. This elevated location would mean that it would be highly visible from almost any direction, rather than a development which blends in seamlessly with the existing buildings.

The illustrations in the proposal are deceptive to say the least. They serve to significantly understate and mislead both the community and planning panel. It under-states the visual impact of the proposed development by excluding the upper stories from many of the illustrations..

Finally, there is a worrying absence of garden and open space within the proposal. It is essentially development that takes up the whole block.

2. IMPOSITION ON EXISTING NEIGHBOURS

The proposed development would:

- Significantly overshadow existing homes and gardens where no overshadowing exists today.
- Render a significant loss of privacy to the existing residents through significantly increasing the extent to which private spaces are overlooked.
- Result in a significant increase in noise in the immediate vicinity at all times of the day, from large air conditioning units operating constantly, frequent refuse collection, car ingress and egress, garage doors, communal outdoor spaces on rooftops or balconies. This increase is exacerbated by the extent of residential use proposed as the current light industrial use is primarily restricted to business hours.
- Impact traffic congestion, especially turning right out of Alberto Street in peak times.
- The residences on the higher floors will direct look into our living spaces. Some will have direct line of sight into the internal living areas of residents in Fred and Alberto St, reducing our current level of privacy. Most will overlook our back-yard area and this will become unusable. This is clearly unacceptable.

I would be happy to have the entire planning panel come to my house to view the impact the proposed development would cause.

The proposal omits this view from all of its documentation, and this perspective should be explicitly considered in the assessment of this proposal.

3. THE FOOTPATH

The proposal makes a virtue of a proposed footpath between the site and 14-22 Alberto Street. This footpath has the potential for unacceptable additional light, noise and foot-traffic alongside our properties, especially at night. I would recommend that this be reconsidered by providing access through the new development rather than alongside it.

4. ALIGNMENT WITH PREVIOUS PLANNING PRINCIPLES FOR THE SITE

The proposal includes an analysis against the previous planning principles for the site. I summarise their point of view in the table below, together with my perspective on the proposal. There are clearly many objectionable ways in which this proposal is inconsistent with these principles.

Principle	The proposal view	My perspective
Heritage conservation	The proposal retains heritage and is consistent	I do not object on this basis
Land use	The proposal increases employment for industrial purposes	I do not object on this basis
Local amenity	The proposal outlines significant impact on local amenity	I object to this significant deterioration in local amenity especially overshadowing, overlooking, noise and traffic impacts.
Built form	The building significantly changes the built form and dramatically increases the building envelope.	I object to this significant deviation from the previously determined planning principle for the site as described above.
Parking and vehicular access	Parking is sufficient and included in the basement levels	I object to the scale of residential use and the resultant parking and noise impacts arising. The impact of visitors, guests or temporary short term use of the residential apartments must also be considered.

Principle	The proposal view	My perspective
Traffic generation	Traffic impact is minimal.	I find this conclusion hard to understand given the local traffic congestion, the difficulty of access to Balmain Road from Cecily and Alberto Street. I believe that this should be re-examined, especially in peak hours and on Saturdays.
Site permeability	Public pedestrian connection should be provided through the site.	I object to the proposed footpath alongside the site rather than through the site, as outlined above.
Open space	The principle is met through development at podium/rooftop levels and footpaths	I object to the limited open space/garden within the development. It is essentially built form across the whole block.
Ecological sustainability	The development is intrinsically sustainable.	I object to the representation that this is intrinsically ecologically sustainable – any development of this density will lead to a significant use of power and air-conditioning. A reduction in density will likely improve ecological sustainability.

5. IMPACT OF THIS PROPOSAL NEEDS TO BE CONSIDERED IN CONTEXT WITH CURRENT AND UPCOMING DEVELOPMENTS

- There are major construction and building works already scheduled to occur in the surrounding area within a 650-meter radius of this proposed planning proposal. The impact of the current proposal needs to be considered as additional to the future level of impact caused by the current constructions and developments.
- The Westconnex has many factors to be considered in assessing the impacts of this proposal. Firstly the Westconnex tunnel will run directly beneath or directly adjacent to the proposed building site, limiting the depth to which the developers will be able to excavate and therefore limiting the number of parking spaces that can be created. Secondly, the level of noise and air pollution created by the Westconnex needs to be considered in respect to the noise and other pollution created by 142 high density residential apartments
- There are also two other large developments with ~190 residences (173 and 16 respectively) within 650 meters of this proposed development. These current developments will already significantly impact local amenities, public transport, traffic, parking, school capacity, noise and air pollution, NBN capacity, and social well-being of the community. The current proposal will be adding to this already inflated and over stretched capacity of the local amenities
- Impact traffic congestion, especially Alberto Street, Fred St, and Cecily St.

6. PARKING

- The proposal states it will PROVIDE A MAXIMUM OF 182 PARKING SPOTS for the 142 residences.

The proposal does not outline how it will cater for parking for the potential 488+ vehicles and 10+ trucks each day

Likely parking generated by development

142 residences with a conservative mean of 1.5 vehicles per residence 251 vehicles

Visitors/deliveries with a conservative mean of 0.5 vehicles per residence 71 vehicles

Employee vehicles for the light commercial businesses (the calculation in the traffic report states that of the 130 employees only 14 would take public transport) 116 cars

Customer vehicles for the light commercial businesses ~50 cars

Trucks and delivery vehicles requiring loading bay access for businesses ~10+

Total daily vehicles to gain access to the site and require parking 488+ cars 10+ trucks/vans

- The current street parking is at capacity. It is rare to be able to find on-street parking in this region of Lilyfield. The majority of houses currently rely on on-street parking as they do not have garage or off-street parking access on their properties.

Therefore, this significant increase in high-density residences will significantly impact the local residences, many of which will no longer be able to park near their homes.

- The traffic report submitted with the proposal appears to contain inaccuracies in the statements made around traffic and parking, which alters the potential impact of the proposal
 - The report states that additional parking will be created on Balmain road. This is inaccurate as currently parking occurs on the entirety of the Balmain Road frontage, including over the one small driveway that is close to Cecily street which is not currently used as a driveway access. Therefore, the proposal allows for no additional parking on Balmain road
 - The report states that access to the building will be provided on Cecily street. Currently Cecily street has onsite parking directly across from where the proposed entry will be. As Cecily street only allows for traffic flow in one direction at a time, this on-street parking would have to be removed to allow for the site entrance – resulting in the immediate reduction of 5 on-street parking spaces on Cecily street
 - The report also states that an entrance will be created in Fred st, allowing for additional car spaces. Fred St currently contains a very small driveway entrance to the factory building. If this driveway is extended to allow for the free -passage of the 400+ cars into the building site, then Fred st is likely to lose an additional 6-8 on-street car spaces as it is currently 90 degree parking there, which allows for larger numbers of car parks
 - The proposed removal of the two driveways in Alberto St will add 2 additional car spaces
- The ability of the proposal to create multi-storey underground car parks is also now going to be limited by the proposed Westconnex tunnels, which currently are planned to run underneath or adjacent to the proposed site

7. TRAFFIC

The submitted traffic report appears to have many inaccuracies and therefore may be misleading.

- The current traffic assessment DOES NOT take into account the imminent substantial increase in local traffic that will stem from the 173 residential apartments and retail sector which will be built soon on the corner of Darling St and Victoria Road, and the additional 16 apartments on Darling St, which are both within 650m from the proposed redevelopment (these apartments and retail will already be adding 200-300 additional cars to the local traffic flow problems in the near future).
- The additional traffic increase from the proposed development report appears to be grossly underestimated, and does not seem to account for the 116 employee cars that will be arriving at the site in morning peak hour, nor visitors, nor customers to the businesses
- Significant impact on traffic and Cecily St (a uni-directional road) and intersection at Balmain Rd

The report states that Cecily street is a two lane road with traffic flow in each direction.

However Cecily Street is a narrow street (with on-street parking both north AND south of Fred st) that only allows for traffic flow in one direction at a time, meaning cars need to be able to find a place to pull over and allow other cars through before continuing on their journey. Due to this, additional time needs to be considered in calculating traffic congestion for each car driving in Cecily street.

Even near the traffic lights in Cecily street (where the new proposed car entrance to the building is to be located) the lane is narrow and only allow for traffic flow in one direction at a time. Therefore the significant increase in the peak time load on this section of road will have much larger impacts than stated.

- 700% increase to traffic in Fred st

The report also states that the western end of Fred St (adjacent to the proposed building) has a flow of 20 cars in peak hour. This is grossly overestimated. Fred St is 53 meters in length and primarily caters for on-street parking for the locals in Fred St and the units in Sunnyside court. These cars do not move most days. The traffic flow in Fred st is less than 5 cars per hour at peak time, often there is no traffic flow in this street at all.

Therefore, the additional flow of 35 cars an hour represents a 700% increase to traffic in Fred st, and this is not taking into account the potential additional 116 employee cars that will access the site. This will have significant impact on the local area both in noise, pollution and safety of our children in the local streets

- Underestimated impact on weekend traffic on Balmain Rd/Darling St

The report sites an increase of 50-70 cars at peak times including Saturdays. On Saturday, the traffic on Balmain Road is constantly backed up for 500 meters from Victoria Road all the way to Cecily St. Negotiating this distance in a car usually takes up to 15 minutes on a Saturday. Increasing the traffic by an additional 70 cars at this time will have significant consequences on this already problematic traffic congestion.

- Alberto St – significant impact on turning right onto Balmain Rd

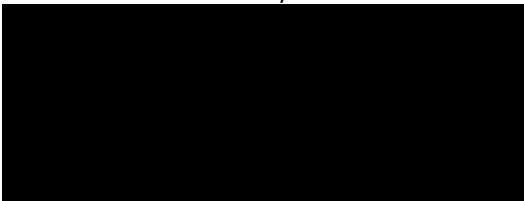
The report states that the visibility is good for entering onto Balmain Road from Alberto St. This is not correct. As Alberto St is slightly down hill from Balmain Road, and vehicles park all along Balmain road, it is very difficult to see traffic coming in either direction, and it is often needed to enter onto Balmain road a little to be able to clearly see the traffic. There are many near accidents at this intersection already, and additional traffic flow of 70+ cars an hour will only exacerbate this

8. OVERSHADOWING - BLOCKAGE OF THE MINIMUM 3 HOURS OF SOLAR ACCESS TO NEIGHBOURING RESIDENCES

- The townhouses directly adjacent to the current building on 469-483 Balmain Road, currently only JUST receive the minimum of 3 hours sunlight between the hours of 9am to 3pm in mid-winter, due to the current height of the building
- The development proposal admits there will be a direct effect on solar access to the nearby residences: stating there will be REDUCTION of 1-2 hours of sunlight between 9-3.
- Therefore, by the developers own admission, the proposed building will deny the mandatory sunlight allowance to the nearby residences

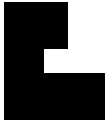
I will be happy to elaborate further at any time.

Yours Sincerely



Kim Holt

From:



Dear Sir/Madam,

I strongly object to the proposal to amend the floor space ratio controls, introduce a maximum building height & additional land use for the following reasons

- 1. Over development of site with an increase in FSR to 2.54:1, when existing is 1:1 & surrounding properties are 0.5:1 or 1:1. This is quite out of character to area & existing density.*
- 2. Substantial increase in number of workers & occupants.*
- 3. Significant increase in traffic & congestion, in already congested area.*
- 4. Massive increase in bulk, height & scale compared to smaller scale of immediate area & not in keeping with current planning & neighbourhood controls*

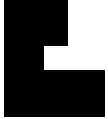
Regards



I have made no political donations.

Kim Holt

From:



Dear Sir/Madam,

I **object** to the current proposal on the basis that the amount of additional traffic generated by the proposal. The traffic report concludes at paragraph 2.42:

“The above analysis has assessed traffic generations of 70, 60 and 50 vehicles per hour two-way during weekday morning and afternoon and Saturday peak hours respectively, which is the traffic generation of both the residential and nonresidential/employment space components. However, the residential component, which is effectively the difference being sought in the planning proposal, would have a generation of 25 to 35 vehicles per hour two-way at peak times, which is a low generation.”

However I do not understand why in the above paragraph the non-residential / employment space vehicle generation was excluded in coming to the conclusion that it will be “low generation”. As a user of that intersection on weekends for sport at Callan Park, we already experience heavy traffic in that area on Saturday mornings and an additional 50-70 vehicles per hour will potentially bring this intersection to a standstill. To the extent that the additional traffic will use other routes:

- The report provides no reasonable evidence for this: and
- This adversely affect the current quiet back streets of Lilyfield and the neighbourhood.

In addition, roughly 40% of the proposal will be at a height significantly larger than surrounding spaces and architecture. It will stick out like a sore thumb. The scale of the development in its current proposed form is too large and needs to be scaled back.

Yours sincerely,



Kim Holt

From:



I wish to object to the planning proposal for the Old Bakery site at 469-483 Balmain Road Lilyfield on the following grounds:

object to the rezoning of this site, based on the fact there is little industrial land left in the inner west. You could refer to local council records in 2005 when the Roche family put forward a development on the site and the council unanimously passed a motion NOT to rezone the site.

object to the amount of apartments included in the development - 142 apartments mean another 142 cars on the streets!

Access to the site appears to be predominantly from Alberto Street. The positioning of the exit from this site, means the lights would shine directly into our bedroom window. This would have a significant impact on my health and wellbeing.

The buildings on Alberto Street are now set back from the road. I object to moving the footprint closer to Alberto Street.

I object there has not been any clear shadow diagrams provided to demonstrate the effect of the 'mass' on the houses closest to the proposed development.

I object the development does not have any consideration for car share facilities as this would be a perfect example of encouraging people to live without owning their own car.

I look forward to your response.



Kim Holt

From:



RE; Development proposal/change of planning regulations for 469-483 Balmain Road, Lilyfield, NSW 2040.

I live in Cecily Street, Lilyfield and have done for 23 years. I strongly oppose the building of 142 apartments in a 6 storey building where this historic warehouse currently stands. Have you seen Balmain Road/Darling Street every morning and on the weekends?? It is a car park!! We do not need 150-300 more cars clogging our area. Our schools are at capacity we are surrounded by development with West Connex, a new one way systems on Lilyfield Road about to be implemented and apartments being built at the nearby site where Essential Ingredient was (731-735 Darling street, Rozelle).

I did not move to Lilyfield to be surrounded by apartments, I could have moved to Pyrmont if I wanted to feel like I'm in Hong Kong. We already have high density living in HOUSES which is now the preferred way forward for the NSW Planning Commission so I am told. Lilyfield is an historic suburb of workers' cottages, warehouses that have been converted into 4 or 6 apartments or townhouses. Old theatres that have not increased their height but have tastefully converted to a few large apartments: not dogboxes! Stop these greedy developers putting 142 apartments at the top of our street!!!

I strongly object to the change in planning laws that would allow this development and I think that the letter sent to us regarding this was clandestine, unclear and downright SHONKY!! Someone is obviously on the take to aid this change to be approved.

STOP GREEDY DEVELOPERS PUTTING A 6 STOREY 142 APARTMENT BLOCK on 469-483 BALMAIN ROAD, LILYFIELD.



Kim Holt

From: Lisa Foley
Sent: Friday, 25 October 2019 3:40 PM
To: Kim Holt
Subject: FW: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 3:20 PM
To: DPE PS ePlanning Mailbox <ePlanning@planning.nsw.gov.au>
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Fri, 25/10/2019 - 15:19
Submitted by: Anonymous
Submitted values are:
Submission Type:I am making a personal submission

Submission: To: NSW Government Planning Panel Att: Planning Panels Secretariat This proposal represents a significant over-development in an area which has and is experiencing high levels of stress. Initially from the third runway with its main flight path directly overhead, then with the significant on going works and stress to home owners related to building of the M4-M5 Link and associated multi levelled tunnelling directly under our homes and now with this proposal which represents a significant precedent for over-development for the area and the site. While we do need to bring new life to old buildings in our community, it's time to consider the existing residents and the impact of the proposed scale of this development and the totally unacceptable level this will have on our community. • The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. • Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. • Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 3:20 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Fri, 25/10/2019 - 15:19

Submitted by: Anonymous

Submitted values are:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Secretariat This proposal represents a significant over-development in an area which has and is experiencing high levels of stress. Initially from the third runway with its main flight path directly overhead, then with the significant on going works and stress to home owners related to building of the M4-M5 Link and associated multi levelled tunnelling directly under our homes and now with this proposal which represents a significant precedent for over-development for the area and the site. While we do need to bring new life to old buildings in our community, it's time to consider the existing residents and the impact of the proposed scale of this development and the totally unacceptable level this will have on our community. • The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. • Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. • Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is [REDACTED]

[REDACTED]

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 7:07 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Mon, 28/10/2019 - 19:06

Submitted by: Anonymous

Submitted values are:

Submission Type:I am making a personal submission

First [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]:submission_file]

Submission: To whom it may concern, I would like to express my deep concern over the proposed development at 469-483 Balmain Rd Lilyfield. My concerns are as follows: • The proposed development is a 6-storey mixed use light industrial and residential block. As a local Fred St resident I am extremely concerned about overshadowing, and I do not wish to lose natural sunlight. My house is already quite dark and if I lost the small amount of natural light that we have, it would have a deep impact on my wellbeing • I am concerned about privacy and overlooking into private courtyards. It would have a significantly negative impact on the way that the courtyard is used in that it would no longer be able to be used • I am concerned about the number of new residents (possibly 350) and the impact that would have on parking, traffic and the increase in noise. The parking is already at capacity in the local area and increased numbers would place a significant strain on an already congested locale. • It will change the look and feel of the neighbourhood in a negative way. Such a big development is out of character with the local area and would be an eye sore. Any new development should be in keeping with the neighbourhood and sympathetic to the existing properties I hope you can understand the impact that such a large development would have on the existing neighbours. It would impact my wellbeing in terms of sunlight, congestion and loss of privacy. [REDACTED]
[REDACTED]

[REDACTED]

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 10:13 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Mon, 28/10/2019 - 22:13

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First

A large black rectangular redaction box covers the contact information, including the first name, last name, email address, and phone number.

Submission file: [webform_submission:values:submission_file]

Submission: I am a visual artist. I have a small home in Lilyfield. I have worked at Studio One + 2 on Balmain Road Rozelle/ Lilyfield for more than ten years. I would not be able to do my painting without these studios which I share with over 40 other artists. My home is too small for me to work there. The area is being taken over by freeways and developers, with no concern about existing shops, light industries, residents, parking and traffic in the area. On the opposite side of the road to Studio One +2 is Callan Park which the people of the Inner West have spent over two decades trying to preserve as a park for the people of the Inner City and Inner West of Sydney; with still no commitment of funding to preserve the heritage gardens and buildings on the site, by either State Governments or Federal governments. Other "commercial" ventures such as the Tigers club are sold and bought back at the cost of millions to the tax payer, the Barrangaroo public land sold for a casino, changes hands within less than 5 years. The State government insisted on mergers of Municipal councils which has meant that the councils are so overloaded with dealing with DA's and far less staff than previously, that the building regulations that protected neighbours and residents have been greatly weakened and developers can destroy the character of an established area, to maximize their monetary rewards and leave the destruction for the residents to live with.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: Lisa Foley
Sent: Friday, 25 October 2019 3:40 PM
To: Kim Holt
Subject: FW: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 12:59 PM
To: DPE PS ePlanning Mailbox <ePlanning@planning.nsw.gov.au>
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Fri, 25/10/2019 - 12:58

Submitted by: Anonymous

Submitted values are:

[REDACTED]

Submission: I am appalled that the Planning Proposal for 469-483 Balmain Rd Lilyfied might be accepted. The floor space is exceptionally large and, as u know, this area of Sydney brings many people to the area because it is historical and this proposal does not fit with surrounding buildings. There is also the on going problem with parking spaces which is becoming worse. Please think seriously before accepting another monumental mistake. There have been so many as u already understand.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 12:59 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Fri, 25/10/2019 - 12:58

Submitted by: Anonymous

Submitted values are:

[REDACTED]

[REDACTED] submission_file]

Submission: I am appalled that the Planning Proposal for 469-483 Balmain Rd Lilyfied might be accepted. The floor space is exceptionally large and, as u know, this area of Sydney brings many people to the area because it is historical and this proposal does not fit with surrounding buildings. There is also the on going problem with parking spaces which is becoming worse. Please think seriously before accepting another monumental mistake. There have been so many as u already understand.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 29 October 2019 11:14 AM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Tue, 29/10/2019 - 11:14

Submitted by: Anonymous

Submitted values are:

Submission Type:I am making a personal submission

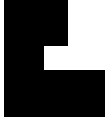
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] submission_file]

Submission: [REDACTED] the following grounds: The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Syd [REDACTED]
[REDACTED]

[REDACTED]

Kim Holt

From:



■ submission is for a rejection to the above development.

As an owner resident in Cecily st Lilyfield for the past almost 30 yrs I have experienced only growing congestion to our small suburb. We are unable to process the traffic congestion currently along Balmain rd at this junction and up to Rozelle. The addition on 142 apartments and the impact this will have on parking and congestion along Balmain rd , Cecily st as well as Fred St and Alfred st will be negative in all aspects.

Allowing this enormous 6 level structure changes the landscape of the village like suburb we have come to love, enjoy and raise our families. Allowing buildings such as this shows only a big money grab, whilst locals suffocate under the strain of west connex and increased development.

Once again the voices of the locals will be undoubtedly ignored, in the push to make the area sterile and faceless like Alexandria has become.

NO. On this day the 28th October I say NO just as my Greek ancestors said NO to the Axis of powers on this day in WWII.

This development should be rejected.



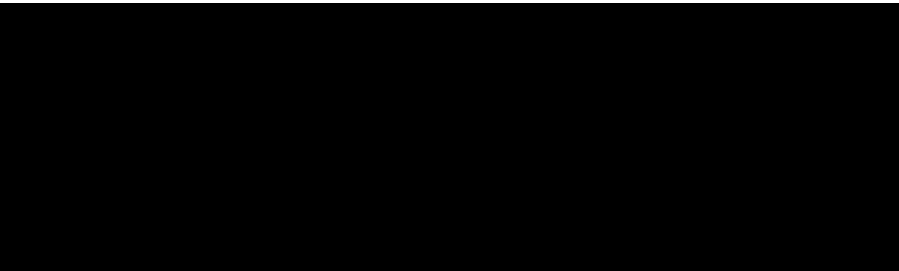
Sent from my iPhone

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 29 October 2019 4:42 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Tue, 29/10/2019 - 16:42

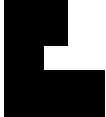
Submitted by: Anonymous



Submission: This Proposal will significantly reduce the amenity of existing residents. - Reduced Privacy & Solar Access. The proposed unit block on the ridge of Nanny Goat Hill will overlook & overshadow existing properties private open space and windows due natural typography and size/height of proposal. - Increased Traffic & Parking Problems. Darling Street is already at capacity during morning rush particular on Saturday morning. Parking will overflow into Callan Park area and thus reduce the ability of local residents to access park. Callan park will become a parking overflow area for this proposal. - 280+ residents will put additional pressure on local services and schools, which are already operating above capacity. This Proposal will negatively affect the character of the suburb. The proposed unit block not sympathetic to the existing character of the suburb nor the site's typography. As it is sited on the ridge it will dominate the local landscape and be seen from The Anzac and Harbour bridges as an ugly node defining the suburb. Existing Local unit development has been limited to 3-4 storeys. This proposal is doubled any existing precedent. This unit block will also dominate Callan Park. This proposal is an excessive overdevelopment of the site, which will be detrimental to the character of the suburb and the amenity of existing residents.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

From:



To the Planning Panels Secretariat

REF: Planning Proposal Submission: 469-483 Balmain Road Lilyfield

I absolutely **object** to the current proposal for the development of 469-483 Balmain Road Lilyfield.

The site is being **over developed**. 142 residential units is far too many apartments for such a small site. The current proposal is for a 6 storey tower. This will create over shadowing to existing properties on Fred Street and is out of character with other buildings in the area.

Traffic:

Traffic forecasts have not been done with weekend traffic conditions included. At present, trying to turn right on to Balmain Road from Cecily Street to cross over Victoria Road on a Saturday can take up to 20 minutes. Imagine the traffic congestion with an additional 150+ cars entering Balmain road from the flats if that number is approved.

Parking:

Fred Street is a quiet cul-de-sac which will not be able to cope with the increased traffic. Most houses in Fred Street, Cecily and O'Neil streets do not have off-street parking, so rely on street parking.

Equally, the road width on Cecily Street is also narrow and could also not cope with such a huge development.

Driveway movements from the apartment building will create bottle necks of traffic as the streets are so narrow.

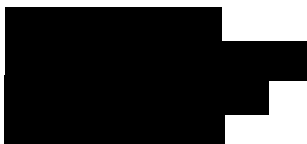
Equally, footpaths are narrow, so even foot traffic will be an issue - including a safety one with all the extra vehicular movements.

The Building Development itself:

Whilst I recognise the need for the site to be developed, a more sensible limit should be applied and I would hope that the building height would not be any more than 3 storeys to be in keeping with current building heights and ease congestion in the area.

The current design is well conceived, but the overall height and scale is way out of proportion to the site and the area. This needs to be urgently scaled back to a reasonable level.

Please do not allow greedy over development be part of the future of this special inner west community. Please be sensible in how this site is developed.



From:



Planning Proposal Balmain Road

We strongly object to this proposal

Our grounds for objection include,

- A) The likely significant increase traffic, causing increased congestion. (N.B. the misleading information given on traffic (both vehicle and walkers) plus the likely effect on connecting roads which are already congested, with limited and poor footpaths.
- B) The size of the development, it should be no more than three stories, and the effect it will have on our surrounding locality

Reference A)

- 1) Street parking in Cecily Street near the proposed development and Fred Street is already at a premium. Most houses in the part of Cecily Street (between Fred and O'Neil) have NO parking space other than the road. Parking is used by commuters catching busses to the city and local houses at night. Most days it is impossible to find a parking spot after 9.00 a.m.
 - 2) This part of Cecily Street is very narrow , so with parking it is impossible to support an increase two way traffic, as the report assumes. Even during off peak periods. The pavement is also VERY narrow and on BIN days impossible to use without stepping into the road. Banning parking in this part of Cecily Street would not be an effective solution. The traffic report simplifies the facts to make it seem that there are zero issues being a two lane two way road. This upper part of Cecily Street is VERY narrow.
 - 3) Turning into Balmain Street when diving from Drummoyne during peak hours (including weekends) can easily take more than three light changes.
 - 4)The traffic report only mentions weekdays. But some of our weekend days have the worst traffic jams, requiring even more light changes when driving across Victoria Road to Balmain. These must be considered properly and a solution found. We cannot increase traffic jams.
 - 5)The pavement is very narrow on Balmain Street, especially near the bus stop near the corner of Cecily and Balmain roads. It certainly is not suitable to carry more pedestrian traffic unless the bus stop is moved to outside the proposed development. The propsed plan will increase the danger of pedestrian accidents , so the design must change.
- Traffic issues need to be solved before further development is allowed in the area including parking ,public transport, road access and narrow paving within at least 500 meters of the proposal edges.
- 6) The building report and the traffic report seem unrelated quoting different numbers. The traffic report must be redone to include weekends and turning into Balmain Road from Victoria Street.

Reference B)

Only three stories high buildings should be allowed in this area.

The size of the proposed residential premises is out of keeping with surrounding residential properties. Some are single story , most are two story. Although the design is well conceived, it will create a precedence for other developments with inadequate supporting infrastructure. Lilyfield consists mainly of small houses, with a lot of green trees and surrounds. Off the main road the houses enjoy low noise (except for aircraft) and peaceful surrounds. The factory is large but has been almost dormant for many years, creating a real village feel around Fred and Cecily Streets. This proposal will change the situation now and forever, increasing dangers due to poor roads, narrow pavements and increased use of an infrastructure designed for workers cottages and small farms. Before

extending the city to this area we must improve the infrastructure. If West connect may help, then delay any approval until this is proven.

Clearly marked 'Planning Proposal Submission'.

Your submission must be lodged by close of business **29-Oct-2019** and must include:

- the planning proposal title clearly marked on the front page;
- a statement on whether you support or object to the proposal; and
- the reasons why you support or object to the proposal.

Persons lodging submissions must declare reportable political donations (including donations of \$1000 or more) made in the previous two years. For a copy of the disclosure form please [click here](#).

Your personal information is protected under the *Privacy and Personal Information Act 1998* (PPIP Act). When you make a submission to the Planning Panels we collect your:

- name (including title)
- address
- email (if provided) and
- any other personal information contained in a political donations disclosure statement (if provided)

Making a submission is entirely voluntary and you are under no obligation to provide us with any of your personal information, except as otherwise required by law.

EXHIBITION OF PLANNING PROPOSAL

Planning Proposal Balmain Road

Location: 469-483 Balmain Road Lilyfield

Planning Proposal Authority: The Sydney Eastern City Planning Panel Planning Panel has been appointed as the Relevant Planning Authority for this planning proposal

Local Government Area: Inner West Council



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By email to: PlanComment@planningpanels.nsw.gov.au

RE: DEVELOPMENT APPLICATION – 469-483 Balmain Road, Lilyfield

REFERENCE: 2017SCL068 – Inner West – PP_2017_IWEST_018_00

We are writing to object to the above proposal, which is still much too large a scale for the area and does not comply with Council planning controls for the site.

The new proposal of 6 storeys and 142 apartments will still loom over the existing buildings in the area and be an eyesore. Tall towers are not in line with current streetscape and will potentially pave the way for the disappearance of the Rozelle / Lilyfield community village atmosphere as we become yet another concrete skyscraper jungle.

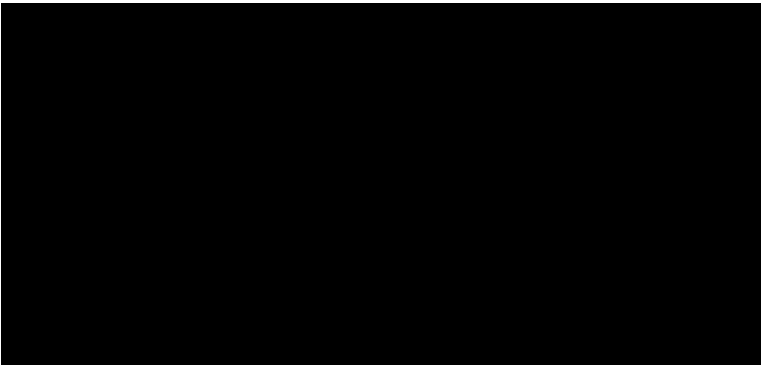
The proposed residential area is larger than allowed by the site planning controls. By reducing this back down to allowable size, the building height can be lowered.

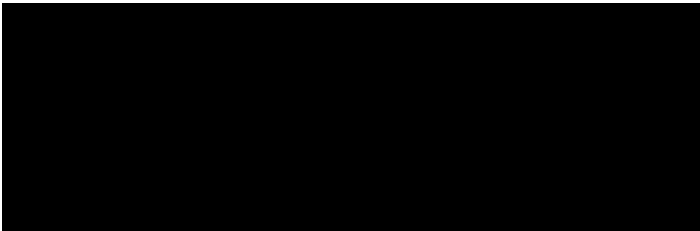
There will be additional foot traffic generated by the new site which will mean cyclists and pedestrians will both need more footpath space to co-exist.

The resulting additional parking and traffic problems of the 142 units in the local streets (Cecily, Maida, Alberto, Darling which are already congested) will negatively impact residents and visitors to the area. Many of the local streets are narrow, with only 1 car able to pass at a time. This, combined with Westconnex rat runs with people trying to avoid tolls, will mean that Darling Street and many other streets will be at a virtual standstill clogged at all times.

The construction period, coinciding with Westconnex construction / tunnelling, on top of the other unit developments in the near vicinity along Darling Street will mean traffic chaos for local residents with noise from construction machinery, trucks entering / leaving the site, traffic delays etc for years!

More than happy for you to contact either of us to discuss further.





NSW Government Planning Panel

Planning Proposal Number - PP_2017_IWEST_018_00 Panel Reference - 2017SCL068

Letter of Objection to the proposed development at 469-483 Balmain Road, Lilyfield

We have recently been made aware of the planned proposal to develop the light industrial site at 469-483 Balmain Road, Lilyfield. While we have no objection to bringing new life into old buildings, the scale of this project is the cause of our concern.

Lilyfield is a low density dwelling area with very few multi level apartment buildings within the suburb and surrounding areas. The proposed development includes 142 apartments, bringing an estimated 250 new residents. In addition, the proposed development will provide a 6000 sqm non-residential / employment space which is not in keeping with this area. There are a number of factors that I feel will damage the existing environment and local Lilyfield community and I have included my main objections below.

My first objection is the impact this residential development will have on the current educational facilities in the area, namely schools and childcare facilities. The local public primary schools are already close to or at capacity. This proposed development falls in the catchment of Orange Grove Public School, and the HillPDA consulting document referenced in 2016 states that Orange Grove Public is 164% over capacity. The catchment area for Rozelle Public School was reduced in 2018 resulting in an even wider catchment area for Orange Grove Public School. This HillPDA consulting report appears to reference data up to 2016 only and with young families making up a high percentage of the local community residents, more recent data must be used when planning for such large scale projects which will impact families in the area. I feel their estimate of an additional 18 primary school (Kindergarten to year 6) places is underestimated for this area. As stated in Table 17 of their Social Infrastructure Requirements. Not only would this have an impact on education services, but would also impact the availability of before and after school care services at local public schools. The list of After School care providers in the table 15: Child Care Facilities in Proximity to the site, 2016 is out of date, as the service at Jimmy Little Community Centre has not operated since mid 2017. Again, this shows that proposals are begin developed on out of date and inaccurate data.

In addition to school education, early childhood education must also be considered when planning such a large development. Having brought our children up in this area, we know first-hand that there are very few childcare places available to new

families in the wider neighbourhood, so the introduction of 142 apartments would put a further strain on these crucial services. Again, the data referenced is three years old and must be updated to accurately understand the need for childcare services. Our conclusion is that the data being used is 3 years out of date currently and by the time it will be completed the development would have a have a major impact on the community.

Our second objection is the impact of additional motor vehicles on car parking and traffic congestion in the immediate vicinity of the proposed development. The majority of residents rely on on-street parking, and the roads around Cecily Street, Fred Street, Alberto Street and Maida Street are already overcrowded with many residents required to park a long way from their front door. According to the most recent inner west census data, the number of cars per dwelling are 34.8%* for a single car and 36.2%* for two cars. Using this recent census data, it is reasonable to estimate that 142 new apartments would result in approximately 100 additional vehicles for these new residents being in the area. Based on the minimum car parking of 77 spaces allocated in the report by Colston Budd Rogers & Kafes, there is still likely to be an increase on demand for on-street parking which is already a problem for residents within the vicinity of the proposed development. The figures above do not factor in increased traffic and parking due to visitors to the new proposed site.

All of these vehicles would also access the parking by either Fred Street or Alberto street which will again create more traffic on these narrow roads as they will then need to exit on Balmain Road via Cecily Street.

The report by Colston Budd Rogers & Kafes states that the site would produce an estimated 130 working opportunities - of these only approximately 15 people would travel to the site by public transport meaning that the remaining estimated 115 people would be using their cars and would require parking. The report only makes allocation for underground parking for a maximum of 40 cars and a minimum of 24 cars. This would mean at the very least an extra 75 cars would be looking to park on the existing roads. Also, with the introduction of West Connex a large number of local parking areas have been removed around the area. Already there are a number of businesses whose employees park in Cecily St and the surrounding area during the day making it very difficult for residents who need to access their homes.

The proposal states that the addition of the new development would not have an impact on traffic congestion in the local area. Traffic congestion in the local area is increasing and has become particularly congested on weekends. Given the area is largely populated with young families, weekends are a key time for team based physical activities. The transportation of children is normally done by car as there is no convenient public transport system to get to fields and playing grounds. The Balmain District Football Club is one of the largest community-based sporting clubs in Australia with over 3000 members and many of their facilities are located in Callan park and other sporting fields within 2km of the proposed development. Given games are played against other inner west clubs on both Saturdays and Sundays, this also adds to traffic congestion on weekends.

In addition, the area is also home to the popular markets located at Rozelle Public School and Orange Grove Public School. These markets are visited by people from all over Sydney and again add to the traffic congestion on weekends. The so called good existing public transport as stated in the proposal document does not provide convenient accessibility to cater for these destinations with buses getting caught up in the traffic jams on Balmain Road.

The proposal also states the light rail stations are close to the development. Having lived close to the proposed development site for over 15 years now, I can confidently say that the majority of people who live in the proximity of the proposed development do not use the light rail as a form of daily public transport. The nearest light rail station is a 1.2 km walk, and not 800m as stated in the document as they have made this as a direct straight line. This walk takes approximately 20 minutes. Most current residents take the shorter 10 minute walk to Victoria Street to take the bus into the city. Additional residents using these buses for their daily public transport will only add pressure to the already overcrowded bus services that run from the Rozelle interchange. As the Rozelle and Lilyfield area has grown in the last 10 years these services have got busier and busier and now during peak time locals often have to wait for 3 busses to pass before one stops that has space for a couple of people. Bus services from Lilyfield/Rozelle direct to the Balmain East ferry terminal recently ceased, meaning the ferry as alternative public transport option to Barangaroo and city has resulted in more residents using buses at the Rozelle interchange.

The traffic report provided by Colston Budd Rogers & Kafes states that currently 77% of people use their cars to get to their place of work. They have also concluded that somehow that 4% of residents use the train. Given the nearest station is either Stanmore or Town Hall again they would have to be using the local bus service first to get to Town Hall.

They have also suggested that an estimated 170 residents of the new development would travel from the site to a job. From this only 37 people they are proposing would use a bus and around 17 others on some other form of transport this still leaves 116 extra people using their cars every day.

Our final objection is around the proposed examples of previous developments to illustrate projects comparable to proposal on Balmain Road. All of developments referenced as comparable have been built in high density living areas such as London in the UK and Pyrmont and East Village in Sydney. These are not comparable developments as they have been built in high density areas, which are vastly different from the one and two storey dwellings of Lilyfield and surrounding suburbs. Developers are also facing the same issue with the proposed development that is planned for the Balmain Leagues club in Rozelle with the total number of dwelling planned putting too much pressure on the current environment and having a bad social impact on the area.

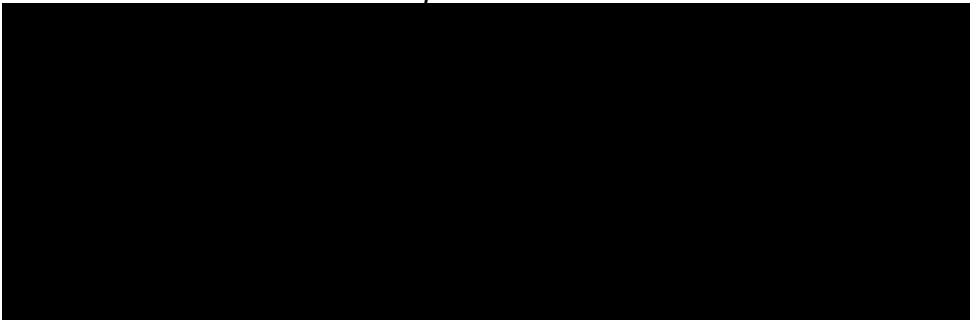
The proposed high level development will also have an effect on the surrounding properties with the residential apartments looking directly down onto them. The shadowing issues for existing residents would mean they would only get a maximum of 3 hours of sunlight during the peak times during winter and would prevent these

properties from using solar during winter months as a way to become more environmentally friendly.

In conclusion:

- We feel that the sheer number of apartments, and resulting increase in new residents, would have a major impact on education services in local community, which are already struggling to keep up with demand. A more up to date impact on key services such as schools and child care should be done focussing on recent data rather than data from 2016 which is out of date.
- The proposed development will put additional strain car parking and traffic congestion in the area which is already an escalating problem and concern for residents.
- The height of the development should be reduced to fit with developments in the local area.

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/LGA14170?opendocument



Kim Holt

[REDACTED]

[REDACTED]

[REDACTED] whom it may concern,

I am writing to advise of my objections in relation to the planning submission to the address 469 - 483 Balmain Road Lilyfield.

As a local resident in the area for close to 10 years I have become increasingly concerned at the increasing development in the Lilyfield area.

Since moving here the traffic in the area due to the dense population is of increasing concern.

In particular on Balmain Road on both week days and even more noticeable on weekends the traffic is almost at a complete stand still for significant time periods.

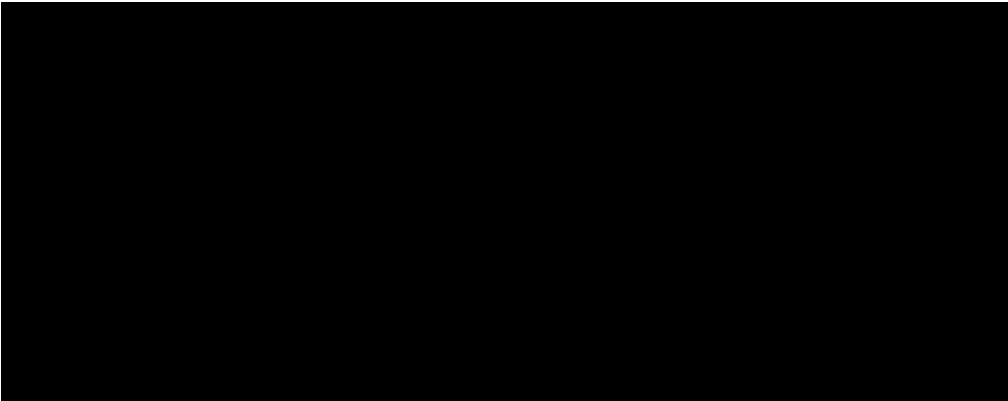
To avoid increasing this issues and disrupting the local area, and comfort and safety of the residents in this area I formally request this planning submission is not allowed.

Thanking you for your consideration.

[REDACTED]

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 12:38 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

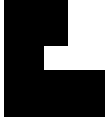


Submission: I live in Cecily Street Lilyfield and feel the development on the corner of Balmain Road and Cecily Street should not contain any apartment towers and should be kept to two storey dwellings. The traffic on Balmain Road in peak hours is already at a standstill and with all the development 


URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From:



I hereby submit a formal letter AGAINST the following:

Planning Proposal Balmain Road

Location: 469-483 Balmain Road Lilyfield

I object to this proposal.

I object because the proposed size and scale is completely out of character with local surrounds, isn't sympathetic to local buildings and the additional traffic caused by 142 additional apartments is completely unsustainable in an area that is already gridlocked.



28nd October 2019

Planning Panels Secretariat
GPO Box 39
Sydney NSW 2001

By email: PlanComment@planningpanels.nsw.gov.au

Dear Sir/Madam

PLANNING PROPOSAL SUBMISSION

NOTICE OF OBJECTION TO PLANNING PROPOSAL FOR 469-483 BALMAIN ROAD, LILYFIELD.

Reference 2017SCL068 - Inner West – PP_2017_IWEST_018_00

I write to object to the above proposal on a number of issues including those outlined below. I will be happy to elaborate further at any future opportunity including a public meeting.

IMPACT OF THIS PROPOSAL NEEDS TO BE CONSIDERED IN CONTEXT WITH CURRENT AND UPCOMING DEVELOPMENTS

- There are major construction and building works already scheduled to occur in the surrounding area within a 650-meter radius of this proposed planning proposal. The impact of the current proposal needs to be considered as additional to the future level of impact caused by the current constructions and developments.
- The Westconnex has many factors to be considered in assessing the impacts of this proposal. Firstly the Westconnex tunnel will run directly beneath or directly adjacent to the proposed building site, limiting the depth to which the developers will be able to excavate and therefore limiting the number of parking spaces that can be created. Secondly, the level of noise and air pollution created by the Westconnex needs to be considered in respect to the noise and other pollution created by 142 high density residential apartments
- There are also two other large developments with ~190 residences (173 and 16 respectively) within 650 meters of this proposed development. These current developments will already significantly impact local amenities, public transport, traffic, parking, school capacity, noise and air pollution, NBN capacity, and social well-being of the community. The current proposal will be adding to this already inflated and over stretched capacity of the local amenities

BUILT FORM AND THE LOCAL STREET SCAPE

- The proposed development is a 6-storey mixed use light industrial and residential block. **This represents a 300-600% increase in height in comparison to the majority of the buildings in Lilyfield, particularly those in the immediate vicinity**
- The vast majority of existing housing in the vicinity are freestanding homes, duplexes and terraces, and the predominant scale and size is single or double storey homes. Local industrial buildings (including the current buildings on the site) are of a similar scale.
- This proposal is neither in keeping with the local area streetscape nor the character of the neighbourhood. There are no buildings of a similar size or density in the local area, so this development would be a significant and unwelcome precedent to set.
- This is exacerbated by the site's elevated location which means it would be highly visible from almost any direction, rather than being a sympathetic development which blends in seamlessly with the existing buildings.
- The visual bulk of the proposal is unprecedented locally. I would also note that the illustrations in the proposal serve to significantly and misleadingly under-state the visual impact of the proposal by excluding upper storeys from many of the illustrations.

SOCIAL IMPACT AND ECOLOGICAL SUSTAINABILITY

- **An increase in high density apartments is not required in this area, i.e. 142 residential apartments and will likely be flooding the local Lilyfield property market. This is especially pertinent due to the 173 residential apartments that are to be built on the busy Victoria road and the 16 additional apartments on Darling St, all within 650m from the proposed development site. The already existing planned developments are going to put an increased strain on the local amenities and an additional development of near the same size will stretch the amenities beyond their capacity**

It would be better suited to the area to introduce a modest high-quality residential accommodation with maintenance of some of the light commercial business, similar to the current development at 731 Darling St. Link: <https://www.realestate.com.au/property-apartment-nsw-rozelle-132284478?pid=project-profile-ppp-600026522-to-pdp-132284478>

- The NBN in our area is currently not managing with the current load. At peak times, streaming is not possible due to poor speeds and overload on the current system. Increasing the NBN use by a further 142 residential apartments (possibly 350 residents) and 130 employees will affect have detrimental effects.
- Lilyfield is currently a quiet residential area. The concentrated addition of 300+ residences and ~130 employees in the one area will increase noise, pollution, reduce the safety of our children walking and riding in the nearby streets, and will have direct impact socially on the neighbourhood
- Our neighbourhood is currently services well with the existing shops in the local areas (i.e. cafes, supermarkets and light retail), especially with the recent opening of a new Woolworths store in Rozelle 850m from the proposed development. The local area does not require any additional retail or services, especially given the new retail and commercial development to occur on corner of Victoria road and Darling St, 650m up the road

LACKING IN GREEN SPACE

The proposal is reliant on the adjacent Callan park for provision of green space. There is no green space or garden/open space within the development – essentially this is a proposal with significant built form across the whole block.

INCREASED PRESSURE ON LOCAL EDUCATION SERVICES

This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity.

The planning report acknowledges this issue and states that this could be overcome by referral to Rozelle Public School, however Rozelle public is also significantly over 100% capacity. In fact, all schools in the surrounding area at exceeding 100% capacity; including Annandale, Leichhardt, Forest Lodge, Balmain and Nicolson St. These schools are not taking people from outside their boundaries, so this is not a solution to this significant problem

The proposal does not take into account the imminent impact of the 173 residential apartments (Victoria Road) and additional 16 apartments (Darling St) that will soon be built within 650m of the proposed development and the impact these apartments will already have on the local schools and amenities

IMPOSITION ON EXISTING NEIGHBOURS

The proposed development specifically omits the view of how it affects the surrounding neighbours from all of its documentation, and this perspective should be explicitly considered in the assessment of this proposal. The proposal would:

- Significantly overshadow existing homes and gardens where no overshadowing exists today.
- Render a significant loss of privacy to the existing residents through significantly increasing the extent to which private spaces are overlooked.
- Result in a significant increase in noise in the immediate vicinity at all times of the day, from large air conditioning units operating constantly, frequent refuse collection, car ingress and egress, garage doors, communal outdoor spaces on rooftops or balconies. This increase is exacerbated by the extent of residential use proposed as the current light industrial use is primarily restricted to business hours.
- Impact traffic congestion, especially Alberto Street, Fred St, and Cecily St.

PARKING

- The proposal states it will PROVIDE A MAXIMUM OF 182 PARKING SPOTS for the 142 residences.

The proposal does not outline how it will cater for parking for the potential 488+ vehicles and 10+ trucks each day

Likely parking generated by development	
142 residences with a conservative mean of 1.5 vehicles per residence	251 vehicles
Visitors/deliveries with a conservative mean of 0.5 vehicles per residence	71 vehicles
Employee vehicles for the light commercial businesses (the calculation in the traffic report states that of the 130 employees only 14 would take public transport)	116 cars
Customer vehicles for the light commercial businesses	~50 cars
Trucks and delivery vehicles requiring loading bay access for businesses	~10+
Total daily vehicles to gain access to the site and require parking	488+ cars 10+ trucks/vans

- The current street parking is at capacity. It is rare to be able to find on-street parking in this region of Lilyfield. The majority of houses currently rely on on-street parking as they do not have garage or off-street parking access on their properties.

Therefore, this significant increase in high-density residences will significantly impact the local residences, many of which will no longer be able to park near their homes.

- The traffic report submitted with the proposal appears to contain inaccuracies in the statements made around traffic and parking, which alters the potential impact of the proposal
 - The report states that additional parking will be created on Balmain road. This is inaccurate as currently parking occurs on the entirety of the Balmain Road frontage, including over the one small driveway that is close to Cecily street which is not currently used as a driveway access. Therefore, the proposal allows for no additional parking on Balmain road
 - The report states that access to the building will be provided on Cecily street. Currently Cecily street has onsite parking directly across from where the proposed entry will be. As Cecily street only allows for traffic flow in one direction at a time, this on-street parking would have to be removed to allow for the site entrance – **resulting in the immediate reduction of 5 on-street parking spaces on Cecily street**
 - The report also states that an entrance will be created in Fred st, allowing for additional car spaces. Fred St currently contains a very small driveway entrance to the factory building. If this driveway is extended to allow for the free -passage of the 400+ cars into the building site, then Fred st is likely to **lose an additional 6-8 on-street car spaces** as it is currently 90 degree parking there, which allows for larger numbers of car parks
 - The proposed removal of the two driveways in Alberto St will add **2 additional car spaces**
- The ability of the proposal to create multi-storey underground car parks is also now going to be limited by the proposed Westconnex tunnels, which currently are planned to run underneath or adjacent to the proposed site

TRAFFIC

The submitted traffic report appears to have many inaccuracies and therefore may be misleading.

- **The current traffic assessment DOES NOT take into account the imminent substantial increase in local traffic that will stem from the 173 residential apartments and retail sector which will be built soon on the corner of Darling St and Victoria Road, and the additional 16 apartments on Darling St, which are both within 650m from the proposed redevelopment (these apartments and retail will already be adding 200-300 additional cars to the local traffic flow problems in the near future).**
- The additional traffic increase from the proposed development report appears to be grossly underestimated, and does not seem to account for the 116 employee cars that will be arriving at the site in morning peak hour, nor visitors, nor customers to the businesses
- ***Significant impact on traffic and Cecily St (a uni-directional road) and intersection at Balmain Rd***

The report states that Cecily street is a two lane road with traffic flow in each direction.

However Cecily Street is a narrow street (with on-street parking both north AND south of Fred st) that only allows for traffic flow in one direction at a time, meaning cars need to be able to find a place to pull over and allow other cars through before continuing on their journey. Due to this, additional time needs to be considered in calculating traffic congestion for each car driving in Cecily street.

Even near the traffic lights in Cecily street (where the new proposed car entrance to the building is to be located) the lane is narrow and only allow for traffic flow in one direction at a time. Therefore the significant increase in the peak time load on this section of road will have much larger impacts than stated.

- ***700% increase to traffic in Fred st***

The report also states that the western end of Fred St (adjacent to the proposed building) has a flow of 20 cars in peak hour. This is grossly overestimated. Fred St is 53 meters in length and primarily caters for on-street parking for the locals in Fred St and the units in Sunnyside court. These cars do not move most days. The traffic flow in Fred st is less than 5 cars per hour at peak time, often there is no traffic flow in this street at all.

Therefore, the additional flow of 35 cars an hour represents a 700% increase to traffic in Fred st, and this is not taking into account the potential additional 116 employee cars that will access the site. This will have significant impact on the local area both in noise, pollution and safety of our children in the local streets

- ***Underestimated impact on weekend traffic on Balmain Rd/Darling St***

The report sites an increase of 50-70 cars at peak times including Saturdays. On Saturday, the traffic on Balmain Road is constantly backed up for 500 meters from Victoria Road all the way to Cecily St. Negotiating this distance in a car usually takes up to 15 minutes on a Saturday. Increasing the traffic by an additional 70 cars at this time will have significant consequences on this already problematic traffic congestion.

- ***Alberto St – significant impact on turning right onto Balmain Rd***

The report states that the visibility is good for entering onto Balmain Road from Alberto St. This is not correct. As Alberto St is slightly down hill from Balmain Road, and vehicles park all along Balmain road, it is very difficult to see traffic coming in either direction, and it is often needed to enter onto Balmain road a little to be able to clearly see the traffic. There are many near accidents at this intersection already, and additional traffic flow of 70+ cars an hour will only exacerbate this

OVERSHADOWING - BLOCKAGE OF THE MINIMUM 3 HOURS OF SOLAR ACCESS TO NEIGHBOURING RESIDENCES

- The townhouses directly adjacent to the current building on 469-483 Balmain Road, currently only JUST receive the minimum of 3 hours sunlight between the hours of 9am to 3pm in mid-winter, due to the current height of the building
- The development proposal admits there will be a direct effect on solar access to the nearby residences: stating there will be **REDUCTION** of 1-2 hours of sunlight between 9-3.

- Therefore, by the developers own admission, the proposed building will deny the mandatory sunlight allowance to the nearby residences

OVERLOOKING

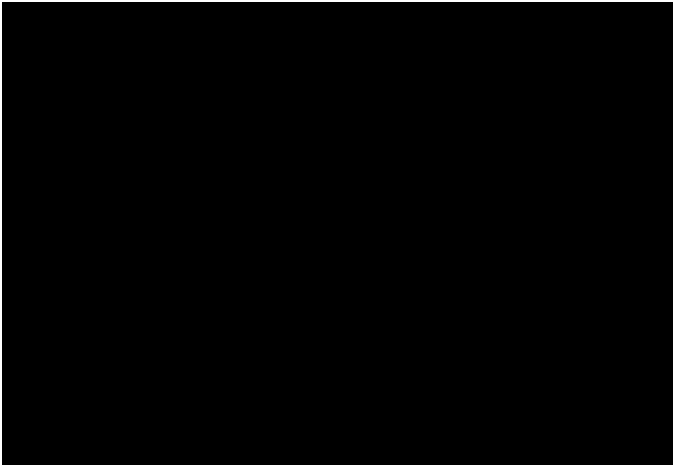
The residences on the higher floors will direct look into our living spaces. Some will have direct line of sight into the internal living areas of residents in Fred and Alberto St, reducing our current level of privacy. Most will overlook our back-yard area and this will become unusable

[REDACTED]

[REDACTED]

[REDACTED]

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 9:09 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



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Submission: PLANNING PROPOSAL SUBMISSION NOTICE OF OBJECTION TO PLANNING PROPOSAL FOR 469-483 BALMAIN ROAD, LILYFIELD. Reference 2017SCL068 - Inner West – PP_2017_IWEST_018_00 I write to object to the above proposal on a number of issues as outlined in the attached pdf document. The attached objection document covers issues related to: IMPACT OF THIS PROPOSAL NEEDS TO BE CONSIDERED IN CONTEXT WITH CURRENT AND UPCOMING DEVELOPMENTS • There are major construction and building works already scheduled to occur in the surrounding area within a 650-meter radius of this proposed planning proposal. The impact of the current proposal needs to be considered as additional to the future level of impact caused by the current constructions and developments. • The Westconnex has many factors to be considered in assessing the impacts of this proposal. Firstly the Westconnex tunnel will run directly beneath or directly adjacent to the proposed building site, limiting the depth to which the developers will be able to excavate and therefore limiting the number of parking spaces that can be created. Secondly, the level of noise and air pollution created by the Westconnex needs to be considered in respect to the noise and other pollution created by 142 high density residential apartments • There are also two other large developments with ~190 residences (173 and 16 respectively) within 650 meters of this proposed development. These current developments will already significantly impact local amenities, public transport, traffic, parking, school capacity, noise and air pollution, NBN capacity, and social well-being of the community. The current proposal will be adding to this already inflated and over stretched capacity of the local amenities BUILT FORM AND THE LOCAL STREET SCAPE • The proposed development is a 6-storey mixed use light industrial and residential block. This represents a 300-600% increase in height in comparison to the majority of the buildings in Lilyfield, particularly those in the immediate vicinity • The vast majority of existing housing in the vicinity are freestanding homes, duplexes and terraces, and the predominant scale and size is single or double storey homes. Local industrial buildings (including the current buildings on the site) are of a similar scale. • This proposal is neither in keeping with the local area streetscape nor the character of the neighbourhood. There are no buildings of a similar size or density in the local area, so this development would be a significant and unwelcome precedent to set. • This is exacerbated by the site's elevated location which means it would be highly visible from almost any direction, rather than being a sympathetic development which blends in seamlessly with the existing buildings. • The visual bulk of the proposal is unprecedented locally. I would also note that the illustrations in the proposal serve to significantly and misleadingly under-state the visual impact of the proposal by excluding upper storeys from many of the illustrations. SOCIAL IMPACT AND ECOLOGICAL SUSTAINABILITY • An increase in high density apartments is not required in this area, i.e. 142 residential apartments and will likely be flooding the local Lilyfield property market. This is especially pertinent due to the 173 residential apartments that are to be built on the busy Victoria road and the 16 additional apartments on Darling St, all within 650m from the proposed development site. The already existing planned developments are going to put an increased strain on the local amenities and an additional development of near the same size will stretch the amenities beyond their capacity It would be better suited to the area to introduce a

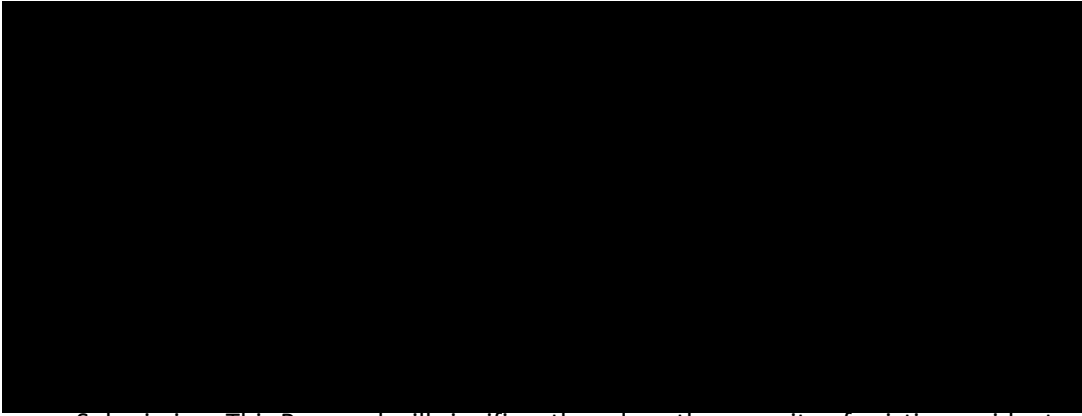
modest high-quality residential accommodation with maintenance of some of the light commercial business, similar to the current development at 731 Darling St. Link: <https://www.realestate.com.au/property-apartment-nsw-rozelle-132284478?pid=project-profile-ppp-600026522-to-pdp-132284478> • The NBN in our area is currently not managing with the current load. At peak times, streaming is not possible due to poor speeds and overload on the current system. Increasing the NBN use by a further 142 residential apartments (possibly 350 residents) and 130 employees will affect have detrimental effects. • Lilyfield is currently a quiet residential area. The concentrated addition of 300+ residences and ~130 employees in the one area will increase noise, pollution, reduce the safety of our children walking and riding in the nearby streets, and will have direct impact socially on the neighbourhood • Our neighbourhood is currently services well with the existing shops in the local areas (i.e. cafes, supermarkets and light retail), especially with the recent opening of a new Woolworths store in Rozelle 850m from the proposed development. The local area does not require any additional retail or services, especially given the new retail and commercial development to occur on corner of Victoria road and Darling St, 650m up the road LACKING IN GREEN SPACE The proposal is reliant on the adjacent Callan park for provision of green space. There is no green space or garden/open space within the development – essentially this is a proposal with significant built form across the whole block. INCREASED PRESSURE ON LOCAL EDUCATION SERVICES This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity. The planning report acknowledges this issue and states that this could be overcome by referral to Rozelle Public School, however Rozelle public is also significantly over 100% capacity. In fact, all schools in the surrounding area at exceeding 100% capacity; including Annandale, Leichhardt, Forest Lodge, Balmain and Nicolson St. These schools are not taking people from outside their boundaries, so this is not a solution to this significant problem The proposal does not take into account the imminent impact of the 173 residential apartments (Victoria Road) and additional 16 apartments (Darling St) that will soon be built within 650m of the proposed development and the impact these apartments will already have on the local schools and amenities IMPOSITION ON EXISTING NEIGHBOURS The proposed development specifically omits the view of how it affects the surrounding neighbours from all of its documentation, and this perspective should be explicitly considered in the assessment of this proposal. The proposal would: • Significantly overshadow existing homes and gardens where no overshadowing exists today. • Render a significant loss of privacy to the existing residents through significantly increasing the extent to which private spaces are overlooked. • Result in a significant increase in noise in the immediate vicinity at all times of the day, from large air conditioning units operating constantly, frequent refuse collection, car ingress and egress, garage doors, communal outdoor spaces on rooftops or balconies. This increase is exacerbated by the extent of residential use proposed as the current light industrial use is primarily restricted to business hours. • Impact traffic congestion, especially Alberto Street, Fred St, and Cecily St. PARKING • The proposal states it will PROVIDE A MAXIMUM OF 182 PARKING SPOTS for the 142 residences. The proposal does not outline how it will cater for parking for the potential 488+ vehicles and 10+ trucks each day Likely parking generated by development * 142 residences with a conservative mean of 1.5 vehicles per residence 251 vehicles * Visitors/deliveries with a conservative mean of 0.5 vehicles per residence 71 vehicles * Employee vehicles for the light commercial businesses (the calculation in the traffic report states that of the 130 employees only 14 would take public transport) 116 cars * Customer vehicles for the light commercial businesses ~50 cars * Trucks and delivery vehicles requiring loading bay access for businesses ~10+ * Total daily vehicles to gain access to the site and require parking 488+ cars and 10+ trucks/vans • The current street parking is at capacity. It is rare to be able to find on-street parking in this region of Lilyfield. The majority of houses currently rely on on-street parking as they do not have garage or off-street parking access on their properties. Therefore, this significant increase in high-density residences will significantly impact the local residences, many of which will no longer be able to park near their homes. • The traffic report submitted with the proposal appears to contain inaccuracies in the statements made around traffic and parking, which alters the potential impact of the proposal - The report states that additional parking will be created on Balmain road. This is inaccurate as currently parking occurs on the entirety of the Balmain Road frontage, including over the one small driveway that is close to Cecily street which is not currently used as a driveway access. Therefore, the proposal allows for no additional parking on Balmain road - The report states that access to the building will be provided on Cecily street. Currently Cecily street has onsite parking directly across from where the proposed entry will be. As Cecily street only allows for traffic flow in one direction at a time, this on-street parking would have to be removed to allow for the site entrance – resulting in the immediate reduction of 5 on-street parking spaces on Cecily street - The report also states that an entrance will be created in Fred st, allowing for additional car spaces. Fred St currently contains a very small driveway entrance to the factory building. If this driveway is extended to allow for the free - passage of the 400+ cars into the building site, then Fred st is likely to loose an additional 6-8 on-street car spaces as it is currently 90 degree parking there, which allows for larger numbers of car parks - The proposed removal of the two driveways in Alberto St will add 2 additional car spaces • The ability of the proposal to create multi-storey

underground car parks is also now going to be limited by the proposed Westconnex tunnels, which currently are planned to run underneath or adjacent to the proposed site TRAFFIC The submitted traffic report appears to have many inaccuracies and therefore may be misleading. • The current traffic assessment DOES NOT take into account the imminent substantial increase in local traffic that will stem from the 173 residential apartments and retail sector which will be built soon on the corner of Darling St and Victoria Road, and the additional 16 apartments on Darling St, which are both within 650m from the proposed redevelopment (these apartments and retail will already be adding 200-300 additional cars to the local traffic flow problems in the near future). • The additional traffic increase from the proposed development report appears to be grossly underestimated, and does not seem to account for the 116 employee cars that will be arriving at the site in morning peak hour, nor visitors, nor customers to the businesses • Significant impact on traffic and Cecily St (a uni-directional road) and intersection at Balmain Rd The report states that Cecily street is a two lane road with traffic flow in each direction. However Cecily Street is a narrow street (with on-street parking both north AND south of Fred st) that only allows for traffic flow in one direction at a time, meaning cars need to be able to find a place to pull over and allow other cars through before continuing on their journey. Due to this, additional time needs to be considered in calculating traffic congestion for each car driving in Cecily street. Even near the traffic lights in Cecily street (where the new proposed car entrance to the building is to be located) the lane is narrow and only allow for traffic flow in one direction at a time. Therefore the significant increase in the peak time load on this section of road will have much larger impacts than stated. • 700% increase to traffic in Fred st The report also states that the western end of Fred St (adjacent to the proposed building) has a flow of 20 cars in peak hour. This is grossly overestimated. Fred St is 53 meters in length and primarily caters for on-street parking for the locals in Fred St and the units in Sunnyside court. These cars do not move most days. The traffic flow in Fred st is less than 5 cars per hour at peak time, often there is no traffic flow in this street at all. Therefore, the additional flow of 35 cars an hour represents a 700% increase to traffic in Fred st, and this is not taking into account the potential additional 116 employee cars that will access the site. This will have significant impact on the local area both in noise, pollution and safety of our children in the local streets • Underestimated impact on weekend traffic on Balmain Rd/Darling St The report sites an increase of 50-70 cars at peak times including Saturdays. On Saturday, the traffic on Balmain Road is constantly backed up for 500 meters from Victoria Road all the way to Cecily St. Negotiating this distance in a car usually takes up to 15 minutes on a Saturday. Increasing the traffic by an additional 70 cars at this time will have significant consequences on this already problematic traffic congestion. • Alberto St – significant impact on turning right onto Balmain Rd The report states that the visibility is good for entering onto Balmain Road from Alberto St. This is not correct. As Alberto St is slightly down hill from Balmain Road, and vehicles park all along Balmain road, it is very difficult to see traffic coming in either direction, and it is often needed to enter onto Balmain road a little to be able to clearly see the traffic. There are many near accidents at this intersection already, and additional traffic flow of 70+ cars an hour will only exacerbate this OVERSHADOWING - BLOCKAGE OF THE MINIMUM 3 HOURS OF SOLAR ACCESS TO NEIGHBOURING RESIDENCES • The townhouses directly adjacent to the current building on 469-483 Balmain Road, currently only JUST receive the minimum of 3 hours sunlight between the hours of 9am to 3pm in mid-winter, due to the current height of the building • The development proposal admits there will be a direct effect on solar access to the nearby residences: stating there will be REDUCTION of 1-2 hours of sunlight between 9-3. • Therefore, by the developers own admission, the proposed building will deny the mandatory sunlight allowance to the nearby residences OVERLOOKING The residences on the higher floors will direct look into our living spaces. Some will have direct line of sight into the internal living areas of residents in Fred and Alberto St, reducing our current level of privacy. Most will overlook our back-yard area and this will become unusable

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 29 October 2019 4:17 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

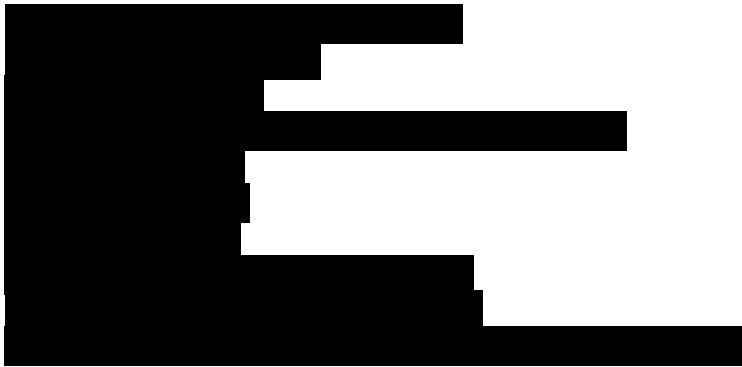


Submission: This Proposal will significantly reduce the amenity of existing residents. - Reduced Privacy & Solar Access. The proposed unit block on the ridge of Nanny Goat Hill will overlook & overshadow existing properties private open space and windows due natural typography and size/height of proposal. - Increased Traffic & Parking Problems. Darling Street is already at capacity during morning rush particular on Saturday morning. Parking will overflow into Callan Park area and thus reduce the ability of local residents to access park. Callan park will become a parking overflow area for this proposal. - 280+ residents will put additional pressure on local services and schools, which are already operating above capacity. This Proposal will negatively affect the character of the suburb. The proposed unit block not sympathetic to the existing character of the suburb nor the site's typography. As it is sited on the ridge it will dominate the local landscape and be seen from The Anzac and Harbour bridges as an ugly node defining the suburb. Existing Local unit development has been limited to 3-4 storeys. This proposal is doubled any existing precedent. This unit block will also dominate Callan Park. This proposal is an excessive overdevelopment of the site, which will be detrimental to the character of the suburb and the amenity of existing residents.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 29 October 2019 3:26 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

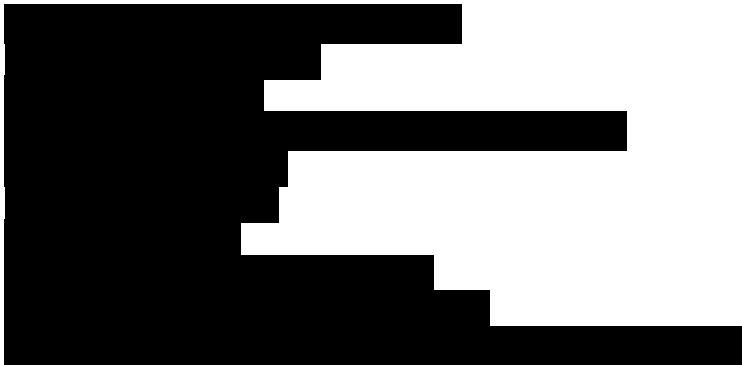


Submission: I am deeply concerned by this Proposal. It will significantly reduce the amenity of existing residents. - Reduced Privacy & Solar Access. The proposed unit block on the ridge of Nanny Goat Hill will overlook & overshadow existing properties private open space and windows due natural typography and size/height of proposal. - Increased Traffic & Parking Problems. Darling Street is already at capacity during morning rush particular on Saturday morning. Parking will overflow into Callan Park area and thus reduce the ability of local residents to access park. Callan park will become a parking overflow area for this proposal. - 280+ residents will put additional pressure on local services and schools, which are already operating above capacity. This Proposal will negatively affect the character of the suburb. The proposed unit block not sympathetic to the existing character of the suburb nor the site's typography. As it is sited on the ridge it will dominate the local landscape and be seen from The Anzac and Harbour bridges as an ugly node defining the suburb. Existing Local unit development has been limited to 3-4 storeys. This proposal is doubled any existing precedent. This unit block will also dominate Callan Park, which is one of the most used and loved green spaces in our community. This proposal is an excessive overdevelopment of the site, which will be detrimental to the character of the suburb and the amenity of existing residents.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Sunday, 27 October 2019 6:16 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

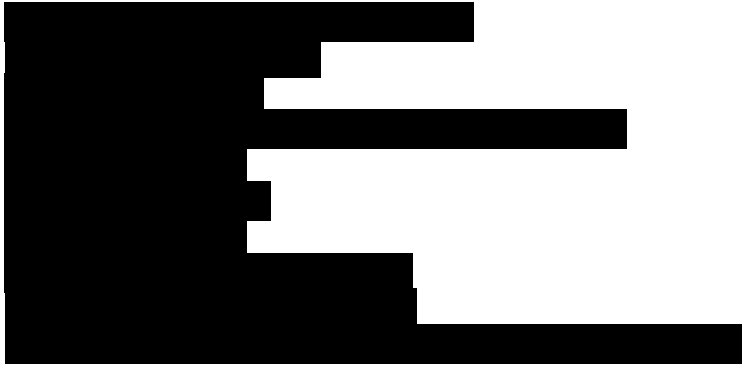


Submission: This proposal represents a significant over-development in an area which has and is experiencing high levels of stress. Initially from the third runway with its main flight path directly overhead, then with the significant on going works and stress to home owners related to building of the M4-M5 Link and associated multi levelled tunnelling directly under our homes and now with this proposal which represents a significant precedent for over-development for the area and the site. While we do need to bring new life to old buildings in our community, it's time to consider the existing residents and the impact of the proposed scale of this development and the totally unacceptable level this will have on our community. • The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. • Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. • Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity. My family and I trust you will take this submission into account. [REDACTED]

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 11:00 AM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



Submission: The bulk and scale of this development is out of step with local standards Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties. Proposal will increase parking stress and traffic congestion A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities. Increased pressure on local services This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: Emily McGrath <mcgrathem@optusnet.com.au>
Sent: Tuesday, 29 October 2019 6:40 PM
To: Plan Comment Mailbox
Subject: Submission - NOTICE OF OBJECTION TO PLANNED DEVELOPMENT 2017SCL068_Inner West-pp_2017_IWEST_018_00 469-483 Balmain Road Lilyfield

NOTICE OF OBJECTION TO
PLANNED DEVELOPMENT 2017SCL068_Inner West-pp_2017_IWEST_018_00
469-483 Balmain Road Lilyfield

Dear Sir or Madam,

I oppose the amendment of floor space ration controls, building height control and the introduction of land use to the IN2 Light industrial use for the following reasons;

In the report on behalf of Roche Group Pty Ltd the description of the current property, current area and potential value is misrepresentative. I have addressed some of the issues below with the references to the page in the report.

The current site may be 14 m on the Cecily Street side however this is only at the apex of the roof and the proposal suggests a building height of 24m, adding 10 m to the current apex and about 15 m to the overall building as it currently sits. There are no other buidings even close to this height in the area.

It also suggests that green walls and tree planting and other sustainability measures will be *considered* as a part of the planning process (p.30). I would like to see this as a guaranteed provision of any approvals.

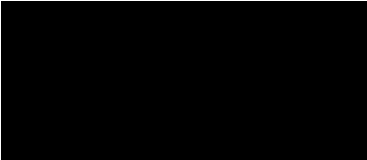
The locality descriptions (Local Context 2.2 p.14) are also not an accurate reflection of the current use in Lilyfield. Callan park will no longer be home to the University Arts faculty after 2020 and the public transport options are already overcrowded or inconvenient for anyone working in the city.

As far as the use of the development for artistic endeavour (p.31), studios or creative spaces, any development would make the space unaffordable to artists or arts organisations to use. And there will be very little community benefit to a commercial operator moving in and will do little to build a socially connected region (p.20). this will also do little to assist in employment in the area.

The traffic flow is already an issue in the area, particularly at peak times. The traffic turning onto darling street from Alberto and Cecily Street is already at capacity and another at least 77 cars (on the very conservative estimate of car use for the development) will have a significant impact on the amenity of the area.

The report prepared seems to base the considerations on out dated data or use and clearly has not considered the current issues for the area. Even the imaging such as the before and after photograph of Fred Street does not represent what is currently there. The spacing is over played and Cecily street is certainly not a wide two lane road as depicted (p.28). Again the modelling is based on fanciful representations of what is actually in the area.

Overall I am not against development in the area per se. It is the scale and resulting traffic issues that this development will bring, particularly when it will be by far the tallest development in the area.



file:///Users/emilymcgrath/Downloads/1._Balmain_Road_-_Planning_Proposal_Report.PDF

Kim Holt

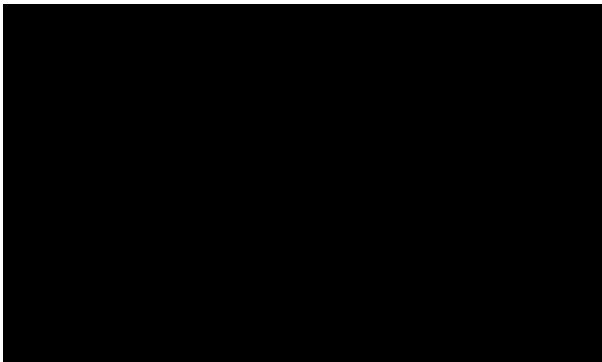
From: denise musto <mustodenise@yahoo.com.au>
Sent: Sunday, 27 October 2019 7:21 PM
To: Plan Comment Mailbox
Subject: PLANNING PROPOSAL 2017SCL068 - Inner West - PP_2017_IWEST_018_00

PLANNING PROPOSAL SUBMISSION

Submission to The Planning Panel, NSW Government

Regarding 469-483 Balmain Road, Lilyfield

RE: PLANNING PROPOSAL 2017SCL068 – Inner West – PP_2017_IWEST_018_00



To whom it may concern

I strongly object to the proposed redevelopment at 469-483 Balmain Road, Lilyfield in its current form.

The proposal is a gross overdevelopment in terms of its height and scale and is completely out of character with the surrounding area, with potentially deleterious effects on the amenity and safety of residents through increased traffic flows and inadequate parking provisions.

HEIGHT AND SCALE

There is no building within the proximity of Balmain Road Rozelle/Lilyfield standing six storeys tall. The tallest structure is two doors further west down Balmain Road and is 4 storeys. This proposed development would represent a jarring intrusion on what is currently a low-rise streetscape.

Clearly, the height of the development should be capped at a maximum of 4 storeys.

TRAFFIC PROBLEMS

I have lived in Maida Street for more than seven years. Even now I always avoid the right turn into Balmain Road from Alberto Street because of its dangers.

I do not understand how the traffic report (Appendix 2) can make this claim:

- 2.40 The number of vehicles turning right into Balmain Road from Alberto Street would remain low. The SIDRA analysis indicates that the intersection will readily cater for these low movements. Observations made during Site inspections indicate that pedestrian and cycle volumes along Balmain Road are low and sight lines are not unusually restricted. Vehicles waiting to turn right from Alberto Street are able to 'see through' vehicles parked on Balmain Road. There are also gaps in the Balmain Road traffic stream created by the traffic signals at Cecily Street. ^[1]_[SEP]

This is absurd. Sight lines are often obscured by vehicles parked on the southside of Balmain Road outside the proposed development, or to the west up Balmain Road. It is not possible to "see through" the vans, trucks and other vehicles often parked there. Cars are travelling at full speed as they approach Alberto Street on Balmain Road from both directions. Balmain Road is regularly used by bicycles. I advise anyone to avoid the right turn onto Balmain Road from Alberto Street.

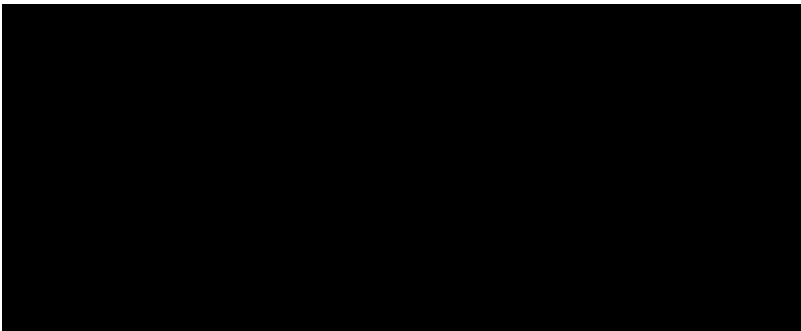
This statement claims: "The proposed development would have a traffic generation of some 70, 60 and 50 vehicles per hour two-way at peak times (being weekday morning, afternoon and Saturday respectively). These are modest traffic generations."

I question the plausibility of this forecast. The Traffic Report (Appendix 2) does not take into account the extra traffic and parking needs of the visitor traffic to the industrial use and the visitor parking to the 142 apartments.

I implore the panel to reject this proposal in its current form.

Thank you for considering these objections. I look forward to your response.

Yours faithfully



Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Monday, 28 October 2019 6:56 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



Submission: This building will have significant impact on Orange Grove Public School, which is currently at 164% of capacity. The school can't accommodate the amount of children that will reside in this building. The building will significantly overlook existing residences. This is quite out of character for the community. There is no provision for parking and the additional 400 cars that this building will create will have a tremendous impact on local traffic flow. Our public transport also cannot accomodate this increase in capita.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

25th October 2019

Planning Panel NSW
Via email

2017SCL068 - Inner West - PP_2017_IWEST_018_00
469-483 Balmain Rd Lilyfield

[REDACTED]

I write in support of the plan for the reasons below:

While the intention of the zoning is to provide industrial premises for local businesses and local employment, the reality is that:

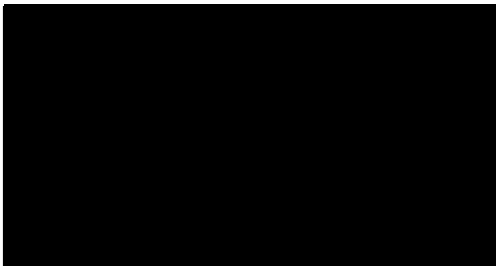
1. The existing properties in the zone are mainly used for residential, retail and commercial. Our property and the Fedwood property on Darling St seem to be the exceptions.
2. Building ages
 - a. All of the buildings in the zone are old (50-100 years). Those that have been recently renovated are used for retail, commercial and residential.
 - b. The low ceiling heights (both internal and overall) make the properties unsuitable for modern businesses (stacking of pallets is not possible due to low ceiling heights and proximity of fire sprinklers).
 - c. Any change of use or small scale DA application by an occupier will likely result in developmental conditions that are not feasible (for example fire audits and upgrades).
3. Parking:
 - a. The industrial properties used as residential properties and the residential properties all have one or two cars, the result being there is no car parking for staff or visitors of the industrial properties. This zone was developed when very few people had cars and trams were the main form of public transport.
 - b. Without parking availability and loading zones, all deliveries (including container trucks) are loaded/unloaded in the middle of the street.
 - c. The parking issues are compounded by the fact that this area is the nearest area to Victoria Rd with unrestricted parking. City commuters and workers from Darling St Rozelle will park in the surrounding streets and walk to Rozelle to work or to catch the bus into the city.

This proposal importantly has underground parking, which is absolutely necessary but undoubtedly only feasible on a larger scale project.

4. Due to a number of deaths in fires over the last few years, InnerWest Council are progressively going to all Industrial and multi-occupancy residential dwellings and ordering a Building Code of Australia (BCA) fire audit then ordering an upgrade of the property to the current standard. For many older buildings, such as the above and our property (50-100 year old properties), these BCA upgrades become either impractical to implement or too costly and the owners end up with no choice and are forced to tear them down and rebuild or sell for redevelopment. Development applications when your property borders multiple residential properties can be extremely difficult to navigate and require specialist skills which are too costly for small scale redevelopments.
5. Land tax has become a major issue for owners of industrial property. With very few industrial properties still left in Lilyfield, our property has been compared to property sales in Leichhardt and Marrickville, which have approved DAs with residential on top of industrial, such as in this application. This has resulted in our land tax assessment increasing dramatically year on year. If land tax continues to increase at similar rates it will soon become uneconomic to keep the property as an industrial one.

Summary

The old nature of the industrial premises in this zone make them unattractive to potential tenants. In order for Industrial property to make any financial sense in this precinct, redevelopment of existing properties to multiuse, multilevel development with a mixture of light industry, commercial and residential with underground parking, has become essential to making the property viable. Without that change, the old industrial properties in the area will remain under utilised and will continue to be used as quasi residential.



2017SCL068 - INNER WEST -PP_2017_IWEST_018_00 - Planning Proposal Balmain Road LOCATION: 469-483 Balmain Road Lilyfield

Dear Sir or Madam,

I strongly object to the proposal.

My reasons why I object to the proposal are as follows:

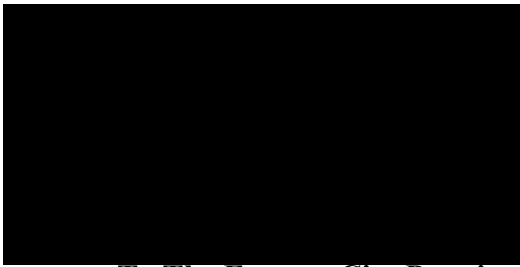
Firstly, the six storey heights in the proposal are too high for the area and not in character. There are no other buildings of comparable bulk and height in the area.

Secondly, the visual impact to the neighbouring residences has been totally ignored especially for the two residences on the adjacent corner, numbers 1 and 3 Fred Street. The five storey section proposed on the corner will be dominating, immense and overpowering because the proposal builds to the current setback and there is only a narrow footpath and Cecily Street separating the residences. The amenity will not be improved for the area; the proposed heights are no different from the current height and the setback will be the same as current. On looking at the proposal, numbers 1 and 3 Fred Street seem to be replaced by trees in the illustrations. This is either deliberately misleading in order to minimize the impact or an ignorant mistake.

Thirdly, to consider traffic flow out of Fred Street to Balmain Road will be dangerous to pedestrians and congest the existing traffic flow. The narrow footpath mentioned in my second reason does not allow two people to walk abreast or two people walking in opposite directions to remain on the footpath without stepping on the street. In addition, the footpath has three street sign poles obstructing passage and it's not possible to walk around them and remain on the footpath, you must at least step momentarily on the street. To consider directing peak traffic along Cecily towards Balmain Road will be dangerous for pedestrians walking this footpath. Plus, the intersection at the corner of Cecily and Balmain Road is currently hazardous with traffic coming in three directions – out of Callan Park and in two opposite directions along Balmain Road. In addition, there is a pedestrian crossing and lights directly to the side with no right turn arrow. This means the green man for pedestrians comes on at the same time the green light is on for traffic turning. To increase traffic along Cecily to the intersection of Balmain and Cecily Street will create a black spot for pedestrians. This is most definitely not adding to amenity in the area.

Fourthly, the proposal states there will be space for creative use in keeping with the current artist residences in the heritage part of the building. However, there is no mention of rent amounts. It is obvious that the artists currently are able to continue their work where they are now because of low rent in an undeveloped building. They will not be able to continue if rent is inflicted on them at a high rate and we will lose another of our creative hubs. It is essential that the plan addresses this obvious omission and it must offer rent and space on a comparative rate to existing, in order to keep the current amenity.

The intersection at the corner of Cecily and Balmain Road is currently hazardous with traffic coming in three directions – out of Callan Park and in two opposite directions along Balmain Road. Plus, there is a pedestrian crossing and lights directly to the side with no right turn arrow. This means the green man for pedestrians comes on at the same time the green light is on for traffic turning.



To The Eastern City Panning Panel

SCL068-Inner West-PP_2017_IWEST_018_00

Address: 469-483 Balmain Road Lilyfield 2040 **Lot/Section/DP:**2 /101583

Submission against the proposal

I object to the height and density of the development. Six stories are too high and will dominate the streetscape which is predominantly one and two stories. The height of the present building (old bakery) would be acceptable, that is, about three stories.

The 6 stories will over shadow nearby residences and block afternoon sun.

Parking in the area is already difficult for residents and the 142 units in this proposed development will not provide enough onsite parking spaces. Most couples nowadays have two cars, unfortunately, which over the past twenty years have impacted local streets with restricted parking and flow of traffic.

The proposed tunnels underneath this area could also impact the stability of the development.

People enjoying Callan Park would have a constant feeling of surveillance from residents in the building.

Lilyfield residents are already surrounded by tunnel excavation and the proposed Bays Project will bring many more people to the area.

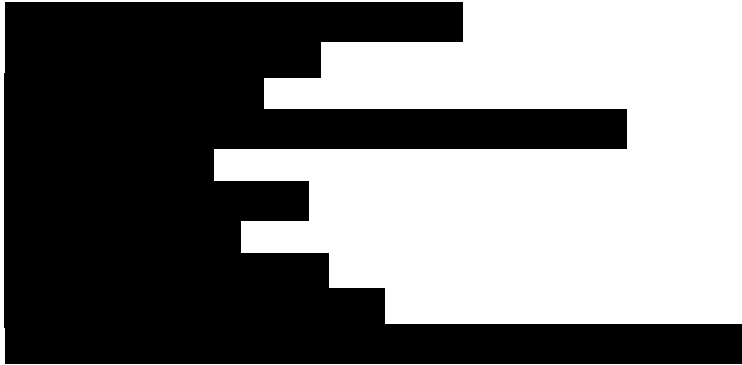
This development will provide 'the thin end of the wedge' for more buildings of this size in Rozelle and will destroy the integrity of the suburb. It is unfortunate that light industrial and other businesses are being forced out because of residential development. If the development or a modification goes ahead I hope artists will be included in the commercial spaces.

A diverse demograph is vital for a vibrant society and neighbourhood.



Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 29 October 2019 2:47 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



Submission: This Proposal will significantly reduce the amenity of existing residents. - Reduced Privacy & Solar Access. The proposed unit block on the ridge of Nanny Goat Hill will overlook & overshadow existing properties private open space and windows due natural typography and size/height of proposal. - Increased Traffic & Parking Problems. Darling Street is already at capacity during morning rush particular on Saturday morning. Parking will overflow into Callan Park area and thus reduce the ability of local residents to access park. Callan park will become a parking overflow area for this proposal. - 280+ residents will put additional pressure on local services and schools, which are already operating above capacity. This Proposal will negatively affect the character of the suburb. The proposed unit block not sympathetic to the existing character of the suburb nor the site's typography. As it is sited on the ridge it will dominate the local landscape and be seen from The Anzac and Harbour bridges as an ugly node defining the suburb. Existing Local unit development has been limited to 3-4 storeys. This proposal is doubled any existing precedent. This unit block will also dominate Callan Park. This proposal is an excessive overdevelopment of the site, which will be detrimental to the character of the suburb and the amenity of existing residents.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

Kim Holt

From: [REDACTED]

Dear Sirs,

RE: 2017SCL068 - Inner West-PP 2017 IWEST 018 00 - 469-483 Balmain Rd, Lilyfield

I am a resident of Lilyfield and wish to object to the above proposal on the following grounds:

1. The proposal will result in substantial development of the site. The change to floor space ratios and additional land use will greatly increase traffic in the area and shadowing over adjoining properties. The traffic on Balmain Rd is already at capacity and often at a stand still. As a minimum, traffic lights with pedestrian lights are urgently required on the corner of Balmain Rd and Alberto St. This corner is dangerous with cars from Alberto St trying to make a right hand turn into a busy Balmain Rd and children trying to cross Balmain Rd to catch school buses. This will only compound with future development of the site which is likely following this planning proposal.
2. Parking for local residents is already difficult particularly in Maida St and Alberto St with most houses not having garages and commuters parking in Maida St and Alberto St during the day to catch buses to work.
3. This site can be distinguished from the proposed Tigers development on Victoria Rd, Rozelle in that the Tigers development is on a main arterial road with prospects for managing traffic plus the future interchange and tunnel at Rozelle will take traffic off Victoria Rd. However, this development at Lilyfield is on **Balmain Rd which is a 2 lane road (one lane each way) with no prospects of being expanded.**

[REDACTED]

Message protected by MailGuard: e-mail anti-virus, anti-spam and content filtering.

<http://www.mailguard.com.au/mg>

PLANNING PROPOSAL SUBMISSION NOTICE OF OBJECTION TO PLANNING PROPOSAL FOR 469-483 BALMAIN ROAD, LILYFIELD. Reference 2017SCL068 - Inner West – PP_2017_IWEST_018_00

Dear Madam/Sir

I write to object to the above proposal based the issues outlined below.

Scale and Bulk

The proposed building bulk and scale are out of proportion with the existing streetscape

The dwellings characteristic of the surrounding dwellings are of medium density and one to two storey tall buildings.

This proposal with its planned 142 units would stand at 23 meters tall, sitting at the highest point of Balmain Road and quite literally overshadowing many of the surrounding properties (including my own backyard) throughout most of the day.

The solar analysis provided by the developer conveniently ends at 3 pm on a winter winter day which leaves only about two more hours of actual light, creating larger and larger shading during those hours.

In addition, I challenge the calculations made on page 51 of *Appendix_A_-Urban_Design_Report(Low-Res).PDF* made by the developer. The percentages listed in the table add up to more than 100% and reflect completely wrong numbers – Based on the footprints stated (given these are actually correct), 46.4% of the bulk is 4 storeys and over, 69.3% is 3 storeys and over (See my Appendix 1 - Building Heights).

On the same page of the above *Appendix_A_-Urban_Design_Report(Low-Res).PDF* it is stated that

- *Taller building elements are located towards Balmain Rd to take advantage of the Callan Park amenity and diversity of heights along Balmain Rd;*
- *Lower building elements are located towards Fred St to provide an appropriate transition towards existing houses;*

This is a complete misrepresentation of the actual building shape. 4, 5, and 6 storey elements spread far into the middle and lower end of the site towards Fred St. For reference also see pages 71 and 75 of said appendix; The cross section pictured is conveniently made at the most favourable part of the building while the two other towers in the middle and to the right bring their complete 5-6 storey height much closer to Fred St.

I strongly oppose the overall height and distribution of storeys of this proposal and would like to point to page 97 of the same *Appendix_A_-Urban_Design_Report(Low-Res).PDF*. It is clear that a floor space ratio of 2.54, which is more than 5 times that of most surrounding lots would be in crass violation of the character our neighbourhood.

Population, Parking and Traffic

The proposal will increase already high parking stress and traffic congestion in the area.

The entire street block between Balmain Road and O'Neill St, and between Cecily St. and Albert St. currently has around 40 units of mostly 2-4 BR buildings or units on the entire block, housing between 100-130 people at maximum.

The proposed development would add about double the amount of population on about 1/3 of the land of that area. This seems absurd given the current parking and traffic situation on those streets.

A majority of local residents and employees rely on local on-street parking in the surrounding streets. The proposed 90 underground parking spaces for 142 new proposed dwellings seems very low and would make it virtually impossible for anyone to find a parking spot at any time of the day.

The proposal also completely the impact of parking of the proposed commercial facilities. Fred St is currently already completely occupied by vehicles from people who work in the commercial buildings on Balmain Road between Alberto St and Foucart St during business hours. Doubling the residential population and adding dozens of potential employees of the business tenantry in the proposed development seems beyond realistic. The impact of those additional cars on the traffic patterns of the area would be equally catastrophic. Even a parking garage of the proposed size would have devastating effects on the traffic to and from Balmain Road,

both for Alberto St. and for Cecily Street. Given that the proposed garage isn't even going to be big enough, the impact of an even bigger garage would create an unimaginable amount of egress and likely cause massive backups on Balmain Road during peak hours.

Increased pressure on local services

The proposed development falls into the catchment of Orange Grove Public School, the school where both of my children are going. The school is already at over capacity at 164% utilisation as well as Sydney Secondary College which is at or near capacity.

Conclusion

I'd like to state that I actually welcome the principle idea of a development on the site. A development that's sensible in size, height and its impact on its surroundings could be a positive addition to the neighbourhood. But the proposal in its current state, as supported by all my points above, seems extremely out of scale and I propound that it would have to be drastically reduced in volume, height and scale.

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir/Madam,

I write to object to the proposed development on Balmain Road. I am a local resident of the area [REDACTED]

This development seeks to lift the building height to 6 storeys to accommodate 142 apartments. My objections are as follows:

1) Unacceptable height, bulk and scale including adverse impact on local heritage area and visual amenity:

At 6 storeys the building height is completely inconsistent with the surrounding area. Lilyfield is generally characterised by low rise heritage buildings of a maximum of 2-3 storeys. The scale of the proposed building is massive in comparison to the surrounding blocks and would not be consistent with the beautiful, heritage character of the area.

Rather than being a site on a major road (eg the taller buildings lining Victoria Road in Drummoyne), this building sits on a suburban street. Balmain Road is not a major artery, and this is a completely inconsistent development relative to many other spot rezonings which have often occurred on major roads or near rail.

2) Traffic impacts:

With 142 proposed residential apartments, the impacts on local traffic will be enormous. The road network in this area is already AT CAPACITY with significant congestion on an almost continual basis leading up to the intersection of Balmain Road and Victoria Road.

There is no current or proposed metro, rail or light rail public transport near this site. The residents have to rely on fairly poor bus connectivity which is further hampered by high traffic congestion.

3) Parking:

A building of this size will always generate significant amounts of street parking from both cars owned by residents and visitors. Street parking in this area is extremely challenging as is and there are many, many local residents who do not have (and are rarely permitted to) construct off-street parking on their premises. Where are they going to park their cars?

In summary, the proposal is TOTALLY INAPPROPRIATE for this area.

These decisions are irreversible and made without consideration of the impact on the local community. Heritage areas should be preserved for generations rather than making short-sighted decisions by people who don't have to live with the consequences.

Please contact me on the below email or phone if you wish to discuss.

[REDACTED]

[REDACTED]

[REDACTED]

Kim Holt

From:

OBJECTION to 2017SCL068 – Inner West – PP_2017_IWEST_018_00 **OBJECTION** to 2017SCL068 – Inner West – PP_2017_IWEST_018_00

Please find attached the objection to the current proposal from the [REDACTED] are a four bedroom residence, a married couple with one child, 3 ½ year old boy.

- We regularly cannot find a park in our street during the day as near all current residents do not have off street parking, traffic has quadrupled with the Westconnex development making our street a thoroughfare. This alone dispels the current traffic survey developer which has been submitted.
- We have great concern on schooling. Schools are breaking in the area. We have no choice to send our own child to Rozelle Primary now, primary reason we purchased in this area and zone now changed.... This type of development is only going to make matters worse, Orange Grove already over run by at least five extra demountables.

Photos attached taken between 8.30 & 9.30 am Monday 14th and Tuesday 15th October 2019. This is reflective of everyday in our street where industry / business vehicles come in and residents cannot find a park anywhere near our houses – common occurrence.

RE: **OBJECTION** to 2017SCL068 – Inner West – PP_2017_IWEST_018_00

[REDACTED] we strongly oppose the current development proposal for the following three points:

- Inaccuracies in the claims on the parking allocation – actual number of car parks allocated to the building.
- Size and Scale of development does not have precedence in the local community, hence comparisons drawn to developments kilometres away in very different built up inner city communities.
- Large number of Two and Three Bedroom apartments in this development will mean more children for schools that are stretched to capacity.

We will provide further detail on each point below:

- **The bulk and scale of this development is out of step with local standards**

Lilyfield is characterised by medium density one and two story dwellings but this proposal is for a six-storey, 23 metre tall block accommodating 142 new dwellings. This is triple the height of some surrounding structures. The height of this development would also restrict sunlight to surrounding properties.

- Size and Scale of development does not have precedence in the local community, hence comparisons drawn to developments kilometres away in very different built up inner city communities. Please have the developers draw comparisons in the local community or rationale nearby neighbourhoods.
- We are one of those properties that will be overshadowed. Happy to have the developers buy our property at above market price and pay for our stamp duty on a like located property if they want to destroy our street..

- **Proposal will increase parking stress and traffic congestion (photos on accompanying email)**

A majority of local residents rely on local on-street parking in surrounding roads which are already overcrowded. While the exact number of parking spaces hasn't been determined it could be as low as 90 underground parking spaces for 142 new proposed dwellings. The proposal also massively under-provides parking for the proposed commercial facilities.

A number of the apartments are two and three bedroom apartments, which will equate to two or even three vehicles for each apartment. Current parking allowance will not account for even 50% of residents cars.

- Current residences, some of which are 100 years old have been built with no off street parking. We rely on off street parking and this development (40 metres from our front door at 12 Cecily st, will most probably mean we will never be able to park at our front door...
- Our street has already turned into a main thoroughfare with cars cutting through from Vic Rd to Annandale etc. Trucks are even attempting to navigate the street since Westconnex has been initiated.
- **PROPOSAL:** If this development goes ahead we need 2 hr time patrolled parking 24/7 in our street. Existing residents supplied permits and all residents of this building not able to procure parking permits.

- **Increased pressure on local services**

This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is at or near capacity. Within the proposal itself there are inaccuracies a plenty and many hypotheticals that are very incorrect.

- School placings – our schools are over run by demountables!! If there are two & three bedrooms in this development there will be more school age children
- It has already been noted with Westconnex developments, traffic in Cecily Street has increased 5 fold – more worryingly workers utes travelling at speed in a street full of toddlers and primary aged children.... (BTW it would be nice to see some local protection against these hoons in our area – we are being slowly overtaken by these workers with attitudes)

These are just a few topline points. Additionally the precedence this type of development will set is going to ruin the community we bought into 4 + years ago. How can a 6-7 storey building be approved for Balmain road/Darling Street?

[REDACTED]

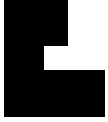
[REDACTED]

[REDACTED]

[REDACTED]

Kim Holt

From:



 Planning Panel,

Re: 469-483 Balmain Road, Lilyfield

I object to the proposal for the following reasons:

Traffic congestion

- 142 apartments, significantly more cars entering exiting at peak hours. Already extremely busy at peak hours.
- 130 employees, further traffic / congestion.
- Car service centre, further congestion as customers drop off & pick up their vehicles.

Parking

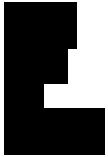
- Parking already a huge issue in recent weeks with WestConnex. Will not improve for a number of years. WestConnex are creating a Carpark for several hundred employees, note the site will have approx 1500 employees.

I have not provided my address, phone number or surname as I DO NOT want my personal details published. Please contact me via email should you need further clarity on my objection.

Regards.

Get [Outlook for Android](#)

Kim Holt



Hello

This email to object to the proposed development at 469-484 balmain road, lilyfield.

The proposal far exceeds the size and scale of the existing building and future developments should be in sync. The parking spaces are woefully inadequate for the number of apartments. If sydney averages 1.58 cars per household, the development should have at least 1 per unit. I am fully supportive of public transport but again, Sydney's transport system is insufficient and inadequate in almost all respects. I lived without a car for 7 years in London, however, bought one within 2 weeks of moving to Sydney - waiting an hour for a bus on Sunday's or taking 2 hours of public transport to get to the beach (for example) necessitates car usage. I agree that there is scope for high density housing in the area, residents can make good use of Callon Park, but this is out of character and excessive. It



Please withhold name

I have made zero political donations

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 25 October 2019 3:43 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content



Submission file: [webform_submission:values:submission_file]

Submission: Traffic report does not take in account changed traffic conditions affecting the area: - Rozelle Interchange, underground and surface works - Rozelle Rail Yard proposed changes with new facilities and changed traffic demand - White Bay Precinct with proposed new facilities and changed traffic demand - Proposed nearby development of Tiger's Club with major increase in retail, commercial and residential traffic These are significant changes to local conditions and could not be disregarded when amending LEP. In general, traffic report is based on wrong assumptions and its conclusions should not be relied on. Heritage report addresses significance of the existing "item" but is not addressing impact of proposed amendment to its heritage surrounding - change of use, bulk and scale will have significant impact on streetscape, Callan Park and overall character of Rozelle/Lilyfield 150 year old urban neighborhood. While the report might be acceptable for addressing the "item" it is not adequate for amendment of LEP. Local precedents as indicated in Urban Design Report do not relate to similar local locations of low/medium density areas but are related to high density Sydney areas. In that respect those can not be considered precedents. Urban design local context doesn't take in account proposed changes to Rozelle Yards, Rozelle Interchange, White Bay Precinct. As such this report is outdated and inadequate support for change of LEP. Location of taller building masses on northern side of the proposed lot represents extremely bad urban design proposal directly opposing recommended principle in SEPP65 - Apartment Design Guidelines - it prevents solar access to large portion of residences and to communal open space as indicated in solar access impact analysis. ADG solar access analysis and conclusions do not seem to correspond to shadow diagrams provided. Many apartments that don't seem to get 2 hour sun access are counted as compliant. Amenity of residential properties on the south of proposed development will be severely reduced by over-hanging from early afternoon hours and definitely in later parts of the day when kids are back from school. Extreme site coverage also contravenes recommendations for communal open space and deep soil planting - it might be adequate for industrial use but not residential. Balmain Road itself is very narrow with narrow footpath in that area and proposed building bulk is hugely inadequate from urban design point of view. Visual impact assessment includes only three photos and is absolutely inadequate for the purpose of assessing change of LEP. Acoustic impact of traffic on Balmain road on north facing apartments doesn't seem to have been analysed. It will have significant impact on amenity of living areas and balconies facing this very busy road. Natural cross ventilation of those apartments will be severely compromised and ADG requirements unlikely met. I don't think that proposed design that doesn't correspond to Government's SEPP can be used to justify change to LEP. Proposal doesn't seem to take in account changed location and extent of Rozelle Interchange in mutual impact these two will have on each other - zone of influence of two level underground basement on extensive underground tunnel system. In general, proposal and supporting documents don't adequately address impact that this development will have on current neighborhood and its future amenity and character. Development proposal itself doesn't seem to provide adequate amenity even for new residents. In many aspects proposed development is sub-standard and as such could not justify proposed amendments to LEP. Public benefit stated can be achieved equally (or better) without such significant change of urban morphology and quality of living in this neighbourhood.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>

From:



Planning Proposal Number: PP_IWEST_018_00

Please accept this notification of our objection to the abovementioned Planning Proposal at 469-483 Balmain Road, Lilyfield.

We would like the Planning Panels Secretariat and the Applicant to be aware of our displeasure in regard to the size and height of the proposed development. [REDACTED] which faces into Alberto Street, only 4 years ago primarily because of the privacy it enjoyed. Our objection is submitted with the aim of engaging both the Planning Panels Secretariat and the site owner to consider pertinent and material negative impacts which we believe the proposal in its current form will have on our property and our enjoyment of its amenity. We believe that amendments to the proposal can alleviate our concerns and we are happy to work collaboratively with all parties.

We submit the following in support of our objection.

HEIGHT: The Planning Proposal currently supports a range of heights from one to six/seven stories to a maximum height of 23 metres.

- The potential for seven stories is completely unacceptable to us. All illustrations suggest a maximum six stories. Please note our objection to the height as it would impact on all of the residents in Fred Street and many residents in Alberto Street. The proposed development will particularly impact our property as it will completely overshadow our property and rob us of morning sun, our lovely view of the cityscape and seriously impact our privacy. Our entire eastern wall is constructed with floor to ceiling glass walls upstairs, where our master bedroom and living/dining and kitchen look toward the proposed development and most proposed dwellings with windows to Alberto street will look directly down to our terrace and into our rooms.
- We note from The Urban Design Report that the buildings fronting Fred Street are reduced in height to be no taller than the existing buildings fronting the street.
- We would like the same consideration shown in Alberto Street. As the adjoining property to ours at 465 Balmain Rd is a four storied apartment block, in the spirit of compromise we seek an amendment to the proposed development such that the maximum height in Alberto Street be no more than four stories to match the existing building next to ours. This matches the design principle applied to the Fred Street frontage by applying an appropriate transition to existing houses and creates a human scale pedestrian experience at street level. This should also reduce some of the overshadowing to our building.

ENVIRONMENTAL IMPACT - VEGETATION: The Planning Report states

- (p21) "the Site currently contains no vegetation". Further, (p51) "*No significant vegetation removal is required as part of the Proposal*".

- Section 5 (Before & After) of the Urban Design Report states that *“blank walls are replaced with friendly facades”*
- These statements ignore the significant foliage on the western (Alberto Street) frontage, which currently provides a beneficial softening/greening effect for all residents, pedestrians and other users of Alberto Street close to Balmain Road. This foliage is clearly illustrated in the “before” renderings on pages 61, 62, 64, 65, 66 & 67 of the Urban Design Report.
- Explicit assurance is sought in relation to the number of additional street trees to be provided as per Objective 30 (p21) of the Planning Proposal Report.
- Explicit assurance is sought that the developer will do more than *“explore potential for green walls and rooves”* (sic) and instead commit that that green walls and roofs as illustrated in the Urban design Report will be delivered.

PRIVACY

Please note our earlier comments regarding privacy and our concerns about the proposed development overlooking our terrace.

- We propose that the development include fixed louvres, angled toward Callan Park, to all apartments which have balconies and windows facing into Alberto Street to stop the residents of looking into our properties and to safeguard our privacy.

PARKING. The Proposal reveals that parking provision is not specified.

- A development proposal for 142 dwellings plus commercial space requires more than an unspecified commitment to *“a minimum of 114 spaces and a maximum of 182 spaces.”*
- We seek a specific commitment to ensure that every residential dwelling in the proposed development has no less than one (1) car space to prevent excessive overflow onto local surrounding streets.

TRAFFIC. The Traffic Report indicates that the unsignalized intersection of Balmain Road with Alberto Street will operate with average delays for the highest delayed movement of less than 35 seconds during peak periods.

- Our experience living on the street has been that movement from Alberto Street to Balmain Road can often be longer than 35 seconds, particularly on busy weekends. Traffic on Balmain Road is already often adversely affected if multiple vehicles are turning onto Alberto Street.
- It is claimed that this represents a Level of Service C (a satisfactory level)
- It is claimed in the Traffic Report (p16) that “vehicles waiting to turn right from Alberto Street are able to “see through” vehicles parked on Balmain Road”. This is true only when those parked vehicles are small sedans. When a commercial vehicle (even a van, let alone a large truck) is parked on this corner it dangerously removes sight lines.
- Has an accident study been undertaken? Such a study would appear to be a requirement of the SIDRA process?

VEHICLE ACCESS. The Planning Proposal Report contains inconsistencies/ambiguity in this area:

- (p49) states *“appropriate vehicular access to the development is proposed to be provided from Alberto Street, Fred Street and/or Cecily Street”*. This suggests a minimum of two and maximum of three vehicle access points.
- By comparison, a diagrammatic representation on p18 of Appendix A – Urban Design Report shows access only from Alberto Street.
- The indicative floor plan on p76 of Annexure A – Urban Design Report shows access only from Alberto Street and Fred Street.

- The SEPP65 and ADG Compliance information on p83 of Annexure A – Urban Design Report states that “*vehicle access is flexible and includes all street frontages except Balmain Road*”.
- The absence of specificity illustrated by the above provides insufficient detail to support the conclusion that ingress and egress is equitably distributed across the site. As parking is very limited in Alberto Street (this issue becomes even more acute with proximity to Balmain Road) we propose further engagement and explicit clarity on vehicle access, including service vehicles for the site.
- Further, while separation of residential and commercial parking assess is considered, it does not appear to be guaranteed in the Proposal. Given the majority of the precedents drawn upon include separate residential and commercial access, and the potential for poor traffic outcomes, we propose that this separation be guaranteed.

We look forward to a considered response which addresses these concerns and will welcome any opportunity to discuss them in a transparent and collaborative manner with the Planning Panels Secretariat members, the developer or their representatives and any other impacted stakeholders. We similarly look forward to a detailed scope/timetable of proposed works.

[REDACTED]

[REDACTED]

Kim Holt

From:



CX

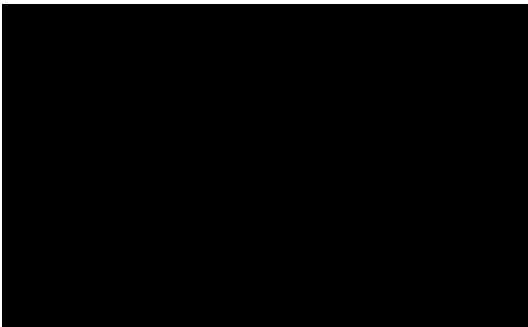
***** NOTE PLS SEE ATTACHMENT FOR FULL COMMENT and IMAGES**

RE: PLANNING PROPOSAL 2017SCL068 – Inner West – PP_2017_IWEST_018_00

PLANNING PROPOSAL SUBMISSION

Submission to The Planning Panel, NSW Government

Regarding 469-483 Balmain Road, Lilyfield



Dear Panel Members

I write to register my objections to the proposed redevelopment at 469-483 Balmain Road, Lilyfield.

The proposal in its current form represents a gross overdevelopment in terms of its height and scale that is absurdly out of character with the surrounding area, with potentially disastrous effects on the amenity and safety of residents through increased traffic flows and inadequate parking provisions.

Please note:

- * The proposal appears to attempt to disguise the height and scale of the development by omitting and obscuring important angles from the illustrations provided in Appendix 1.
- * It fails to accurately represent traffic and parking problems regarding residents, their visitors, commercial businesses and their clients.
- * It fails to consider the narrowness of the surrounding streets and footpaths on Balmain Road and Cecily Street in regard to pedestrian safety.

HEIGHT AND SCALE

This proposal offers no rationale for its size and scale. In the “Reasons for Decision” of the Rezoning Review (2017SCL049 – Inner West - PGR_2017_IWEST_002_00 at 469-483 Balmain Road Lilyfield (AS DESCRIBED IN SCHEDULE 1) a stipulation is made that the proponents: “Ensure a rationale for the height, floor space ratio, and building massing and modulation for the site is prepared and exhibited with the planning proposal.” No “rationale” for the height of this development has been attempted – only the attempts to minimize its visual impact.

I note this excerpt from that document: “While the majority of the Panel supported the proposed FSR of 2.5:1, Panel members Brian McDonald and Debra Laidlaw (that is 2 out of 5 panel members – author’s insertion) were of the opinion that the FSR and the height (approximately 23 metres) were too large to achieve desirable outcomes for both industrial and residential function and amenity.”

I strongly agree.

There is no building within the locale of this development standing six storeys tall. The tallest structure is one rather inelegant residential apartment building two doors further west down Balmain Road of 4 storeys (it is represented on the right-hand side of the Before and After Images presented on page 61 of Appendix 1). This proposed development would represent a jarring intrusion on the streetscape, visible for miles, as it stands on the crest of the Lilyfield ridge.

The Before and After images presented in Appendix 1 raise serious questions about the intentions of the developers to present a fair view of their proposal. In all cases except one, we are offered reverse views, looking up and down each street.

But not Balmain Road. The proposal, in presenting images of the potential visual impact, omits any Before and After view of the development looking west down Balmain Road. You are offered two comparative images, both only looking east.

Even in both of those cases, they appear to be calculated to deceive the eye. In the artist’s impression on page 61, the 4-storey block of flats mentioned earlier is depicted for scale in the foreground of the Before image, on the right-hand side, but is then cropped more tightly in the After image, so that the full comparative height of the new development is diminished (note how the roofline of the 4-storey block disappears out of the frame).

In the After image on page 62, presented from the parkland opposite, the development (in the distance) is almost comically obscured by the foliage of a tree.

Clearly the authors understand the out-of-scale visual impact of a six-storey development, completely out of keeping with the current profile of Balmain Road.

This is the image (below) that has been omitted from the proposal: the view west along Balmain Road. The streetscape comprises a mix of heritage shopfronts and facades, none higher than two storeys, until we get to the old bakery wall of the proposed development.

The proposed height of this development is almost double the height of the old bakery, the current building on the corner of Cecily and Balmain Road. It would be a massive intrusion on this appealing streetscape.

Above: View west down Balmain Road

Elsewhere in Appendix 1, on pages 11 to 16, local and global precedents are presented showing the merging of industrial and residential developments and how they can presumably enhance streetscapes. I ask the Panel to closely examine these. Of those that depict buildings over 4 storeys, All of them are surrounded by buildings of similar height, or heights exceeding them.

97-101 Pyrmont Bridge Road. Clearly a taller building looming over the site in the Before image.

Cnr Bourke and Short Street. Multi-storey high-rise next door.

287-289 O'Sullivan Road, Sydney. A decent, acceptable height of three stories.

East Village, Sydney. That area is peppered by high-rise residential towers.

Dace Road London. Surrounded by buildings of similar height.

Pancras Way London. Neatly blends into surrounding equal building heights.

Andrews Road London. Ditto.

Harbour Road, Canada. Two discreet, attractive storeys.

Iceland Wharf. Surrounded by high-rise developments.

In every case cited, no new development exceeds the height of the surrounding buildings. This proposal defeats the developers' own evidence.

SUMMARY: The height of the development should be capped at a maximum of 4 storeys.

PEDESTRIAN SAFETY

Capping the height of the development at 4 storeys will also have the effect of significantly reducing the number of apartments, thus reducing the risk of the potential disasters awaiting the influx of new traffic to busy Balmain Road and quiet Cecily and Alberto Streets (more on this next page).

Much is made in the proposal of the expansion of footpaths and the retention of heritage features in two areas. This proposal fails to address the issue of pedestrian safety – it is bad enough now, let alone with the addition of hundreds of more residents.

This is the footpath on Balmain Road directly outside the heritage facades:

Above: Looking west down Balmain Road.

Looking north up Cecily Street.

At present both these walkways do not allow the free flow of pedestrian traffic in opposing directions without one party stopping and turning sideways to negotiate, with busy vehicular traffic racing past. Note the placement of the power poles and street signs. There is NO proposal to improve the safety of these walkways – only a proposal to increase the traffic flow of both cars and pedestrians.

TRAFFIC PROBLEMS

Finally, the proposal states: "Traffic generation associated with the Proposal can be accommodated." It goes on to cite Appendix 2: Traffic Report, and makes a number of assertions about the limited impact of the proposal.

As someone who currently lives in Maida Street, and even now studiously avoids the right turn into Balmain Road from Alberto Street because of its dangers, I seriously question the validity of this statement:

- 2.40 The number of vehicles turning right into Balmain Road from Alberto Street would remain low. The SIDRA analysis indicates that the intersection will readily cater for these low movements. Observations made during Site inspections indicate that pedestrian and cycle volumes along Balmain Road are low and sight lines are not unusually restricted. Vehicles waiting to turn right from Alberto Street are able to 'see through' vehicles parked on Balmain Road. There are also gaps in the Balmain Road traffic stream created by the traffic signals at Cecily Street. ^[1]_{SEP}

The claim that a motorist can "see through" a van or a truck parked near the intersection is patently ridiculous – and dangerous. Sight lines are routinely obscured should any modestly sized vehicle be parked on the southside of Balmain Road outside the proposed development, or to the west up Balmain Road. Cars are travelling at full speed as

they approach Alberto Street on Balmain Road from both directions. Balmain Road is regularly used by bicycles – volumes might be low, but that doesn't make the risks any less! It is a perilous manoeuvre to turn right onto Balmain Road from Alberto Street. I routinely avoid it and advise all visitors to do the same.

I cannot overemphasise this. Please, inspect this corner for yourself. Then imagine the extra traffic load piled up behind you trying to get into this free-flowing stream of traffic from a difficult, obscured position.

This statement is also very hard to accept: "The proposed development would have a traffic generation of some 70, 60 and 50 vehicles per hour two-way at peak times (being weekday morning, afternoon and Saturday respectively). These are modest traffic generations." This statement is not supported by any kind of reference. It appears to claim that in a block of 149^[1]_{SEP} apartments, as few as 50 people go to work or drop off the kids in the morning.

This seems implausible. In point 2.38, we read: "The unsignalised intersection of Balmain Road with Alberto Street would operate with average delays for the highest delayed movement of less than 35 seconds during peak periods. This represents level of service C, a satisfactory level of service."

This is not my experience. I am a driver of over 40 years experience with a perfect driving record – and I studiously avoid this manoeuvre. Please investigate this claim fully.

Finally, **car parking**. I draw your attention to the fact that in the Traffic Report (Appendix 2) the words "visitor traffic" or "visitor parking" or "employee parking" and "client parking" do not appear. Zero consideration has been given to the extra traffic flows from the potential businesses residing in this development – it only appears to take into account the hundreds of residents.

This fact alone would appear to entirely discredit this traffic assessment. There is no plan to accommodate the parking needs of the 135 new workers in the commercial section. Nor of the clients of the businesses considered. Obviously they will spill onto the surrounding streets, causing friction with locals, who already contend with a daily influx of commuters. The Panel must ask the question: Why haven't these traffic movements been considered?

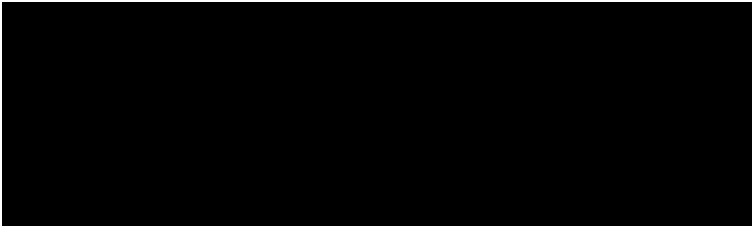
Please reject this proposal in its current form.

Its scale is completely out of keeping with this area. It is a potential blight on the district. It represents dangers to the community.

RE: PLANNING PROPOSAL 2017SCL068 – Inner West – PP_2017_IWEST_018_00

PLANNING PROPOSAL SUBMISSION

Submission to The Planning Panel, NSW Government



Dear Panel Members

I write to register my objections to the proposed redevelopment at 469-483 Balmain Road, Lilyfield.

The proposal in its current form represents a gross overdevelopment in terms of its height and scale that is absurdly out of character with the surrounding area, with potentially disastrous effects on the amenity and safety of residents through increased traffic flows and inadequate parking provisions.

Please note:

- * The proposal appears to attempt to disguise the height and scale of the development by omitting and obscuring important angles from the illustrations provided in Appendix 1.
- * It fails to accurately represent traffic and parking problems regarding residents, their visitors, commercial businesses and their clients.
- * It fails to consider the narrowness of the surrounding streets and footpaths on Balmain Road and Cecily Street in regard to pedestrian safety.
- *

HEIGHT AND SCALE

This proposal offers no rationale for its size and scale. In the “Reasons for Decision” of the Rezoning Review (2017SCL049 – Inner West - PGR_2017_IWEST_002_00 at 469-483 Balmain Road Lilyfield (AS DESCRIBED IN SCHEDULE 1) a stipulation is made that the proponents: “Ensure a rationale for the height, floor space ratio, and building massing and modulation for the site is prepared and exhibited with the planning proposal.” No “rationale” for the height of this development has been attempted – only the attempts to minimize its visual impact.

I note this excerpt from that document: “While the majority of the Panel supported the proposed FSR of 2.5:1, Panel members Brian McDonald and Debra Laidlaw (that is 2 out of 5 panel members – author’s insertion) were of the opinion that the FSR and the height (approximately 23 metres) were too large to achieve desirable outcomes for both industrial and residential function and amenity.”

I strongly agree.

There is no building within the locale of this development standing six storeys tall. The tallest structure is one rather inelegant residential apartment building two doors further west down Balmain Road of 4 storeys (it is represented on the right-hand side of the Before and After Images presented on page 61 of Appendix 1). This proposed development would represent a jarring intrusion on the streetscape, visible for miles, as it stands on the crest of the Lilyfield ridge.

The Before and After images presented in Appendix 1 raise serious questions about the intentions of the developers to present a fair view of their proposal. In all cases except one, we are offered reverse views, looking up and down each street.

But not Balmain Road. The proposal, in presenting images of the potential visual impact, omits

any Before and After view of the development looking west down Balmain Road. You are offered two comparative images, both only looking east.

Even in both of those cases, they appear to be calculated to deceive the eye. In the artist's impression on page 61, the 4-storey block of flats mentioned earlier is depicted for scale in the foreground of the Before image, on the right-hand side, but is then cropped more tightly in the After image, so that the full comparative height of the new development is diminished (note how the roofline of the 4-storey block disappears out of the frame).



In the After image on page 62, presented from the parkland opposite, the development (in the distance) is almost comically obscured by the foliage of a tree.



Clearly the authors understand the out-of-scale visual impact of a six-storey development, completely out of keeping with the current profile of Balmain Road.

This is the image (below) that has been omitted from the proposal: the view west along Balmain Road. The streetscape comprises a mix of heritage shopfronts and facades, none higher than two storeys, until we get to the old bakery wall of the proposed development.

The proposed height of this development is almost double the height of the old bakery, the current building on the corner of Cecily and Balmain Road. It would be a massive intrusion on this appealing streetscape.



Above: View west down Balmain Road

Elsewhere in Appendix 1, on pages 11 to 16, local and global precedents are presented showing the merging of industrial and residential developments and how they can presumably enhance streetscapes. I ask the Panel to closely examine these. Of those that depict buildings over 4 storeys, All of them are surrounded by buildings of similar height, or heights exceeding them.

97-101 Pyrmont Bridge Road. Clearly a taller building looming over the site in the Before image.

Cnr Bourke and Short Street. Multi-storey high-rise next door.

287-289 O'Sullivan Road, Sydney. A decent, acceptable height of three stories.

East Village, Sydney. That area is peppered by high-rise residential towers.

Dace Road London. Surrounded by buildings of similar height.

Pancras Way London. Neatly blends into surrounding equal building heights.

Andrews Road London. Ditto.

Harbour Road, Canada. Two discreet, attractive storeys.

Iceland Wharf. Surrounded by high-rise developments.

In every case cited, no new development exceeds the height of the surrounding buildings. This proposal defeats the developers' own evidence.

SUMMARY: The height of the development should be capped at a maximum of 4 storeys.

PEDESTRIAN SAFETY

Capping the height of the development at 4 storeys will also have the effect of significantly reducing the number of apartments, thus reducing the risk of the potential disasters awaiting the influx of new traffic to busy Balmain Road and quiet Cecily and Alberto Streets (more on this next page).

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cycle volumes along Balmain Road are low and sight lines are not unusually restricted. Vehicles waiting to turn right from Alberto Street are able to 'see through' vehicles parked on Balmain Road. There are also gaps in the Balmain Road traffic stream created by the traffic signals at Cecily Street. ^T_{SEP}

The claim that a motorist can "see through" a van or a truck parked near the intersection is patently ridiculous – and dangerous. Sight lines are routinely obscured should any modestly sized vehicle be parked on the southside of Balmain Road outside the proposed development, or to the west up Balmain Road. Cars are travelling at full speed as they approach Alberto Street on Balmain Road from both directions. Balmain Road is regularly used by bicycles – volumes might be low, but that doesn't make the risks any less! It is a perilous manoeuvre to turn right onto Balmain Road from Alberto Street. I routinely avoid it and advise all visitors to do the same.

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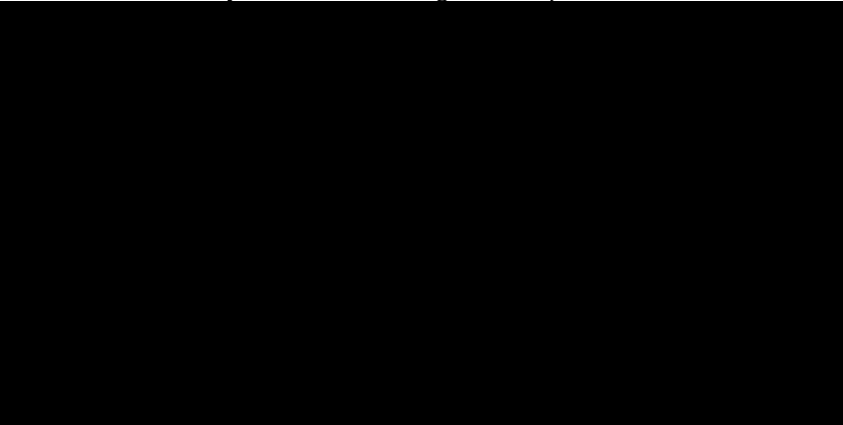
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Please reject this proposal in its current form.

Its scale is completely out of keeping with this area. It is a potential blight on the district. It represents dangers to the community.

Thank you for considering these objections. I look forward to your response.



Good morning I'm re-sending this email from my work email address as there seemed to be some formatting issues which may have made the version I sent from my home laptop yesterday evening difficult to read. The content below is the same.

Dear Sir or Madam,

RE: Planning Proposal Submission: 469-483 Balmain Road Lilyfield: OBJECTION

- Project Title: Planning Proposal Balmain Road
- Panel Reference: 2017SCL068
- Planning Proposal Number: PP_2017_IWEST_018_00

Please accept this notification of our objection to the above planned Planning Proposal.

Preamble

We wish the Planning Panels Secretariat and the Applicant to know that we support reasonable commercial and/or residential development on this site.

both the Planning Panels Secretariat and the site owner to consider pertinent and material negative impacts which we believe the proposal in its current form will have on our own property and our enjoyment of its amenity. We believe that amendments to the proposal can mitigate our concerns and are willing to work collaboratively with all parties to this end. References to pages or sections are to the Planning Proposal Report dated 4 June 2019 (**Planning Proposal Report**) unless otherwise specified.

We submit the following in support of our objection.

HEIGHT. The Planning Proposal Report currently supports a range of heights from one to six/seven storeys at a maximum height of 23m.

- o The potential for seven (7) stories is wholly unacceptable. All renderings/illustrations, etc., suggest a maximum six (6) stories. We note that even a six story building will be an outlier for the local area.
- o The Urban Design Report (Appendix A) notes that the buildings fronting Fred Street are reduced in height to be no taller than the existing buildings fronting the street.
- o As residents of Alberto Street, we seek the same consideration. In the spirit of pragmatic compromise, it is acknowledged that because the existing apartment structure at 465 Balmain Road (which adjoins our property to the west) is four (4) stories, hence we seek an amendment to the proposed development such that the maximum height at Alberto Street be no more than four (4) stories to match the existing building at 465 Balmain Road. This matches the design principle applied to the Fred Street frontage by applying an appropriate transition to existing houses and creates a human scale pedestrian experience at street level. This will also reduce overshadowing. See separate objection.

ENVIRONMENTAL IMPACT - VEGETATION. The Planning Proposal Report states:

- o (p21) "the Site currently contains no vegetation". Further, (p51) "*No significant vegetation removal is required as part of the Proposal*".
- o Section 5 (Before & After) of the Urban Design Report states that "*blank walls are replaced with friendly facades*"
- o These statements ignore the significant foliage on the western (Alberto Street) frontage, which currently provides a beneficial softening/greening effect for all residents, pedestrians and other users of Alberto

Street close to Balmain Road. This foliage is clearly illustrated in the “before” renderings on pages 61, 62, 64, 65, 66 & 67 of the Urban Design Report.

- o Explicit assurance is sought in relation to the number of additional street trees to be provided as per Objective 30 (p21) of the Planning Proposal Report.
- o Explicit assurance is sought that the developer will do more than “*explore potential for green walls and rooves*” (sic) and instead commit that that green walls and roofs as illustrated in the Urban design Report will be delivered.

OVERSHADOWING. Our property at 3/467 Balmain Road is acknowledged as being one which will “*receive some additional shadowing*”.

- o In our case the overshadowing effect is exacerbated because due to the high common walls around our property, our only existing solar access for our property is from the east.
- o Our property also has three (3) solar panels facing the proposed development, so the negative impact of shadowing is also likely to reduce the effectiveness and efficiency of our solar system and result in increased energy costs.
- o We seek a solution that acknowledges the above and submit that this can be achieved through the proposed height amendment canvassed earlier in this objection.

PRIVACY. It appears likely (based on the Urban Design Report renderings) that many dwellings in the proposed development will overlook the external terrace and floor-to-ceiling windows of our main bedroom, as well as the windows of a 2nd bedroom in our residence.

- o We propose that the development include fixed louvres, angled towards Callan Park, for any apartments which have a balcony which faces west to Alberto Street, to ameliorate the loss of privacy.

PARKING. The Proposal reveals that parking provision is not specified.

- o A development proposal for 142 dwellings plus commercial space requires more than an unspecified commitment to “*a minimum of 114 spaces and a maximum of 182 spaces.*”
- o We seek a specific commitment to ensure that every residential dwelling in the proposed development has no less than one (1) car space to prevent excessive overflow onto local surrounding streets.

TRAFFIC. The Traffic Report indicates that the unsignalized intersection of Balmain Road with Alberto Street will operate with average delays for the highest delayed movement of less than 35 seconds during peak periods.

- o Our experience living on the street has been that movement from Alberto to Balmain Road can often be longer than 35 seconds, particularly on busy weekends. Traffic on Balmain Road is already often adversely affected if multiple vehicles are turning onto Alberto Street.
- o It is claimed that this represents a Level of Service C (a satisfactory level)
- o It is claimed in the Traffic Report (p16) that “vehicles waiting to turn right from Alberto Street are able to “see through” vehicles parked on Balmain Road”. This is true only when those parked vehicles are small sedans. When a commercial vehicle (even a van, let alone a large truck) is parked on this corner it dangerously removes sight lines.
- o Has an accident study been undertaken? Such a study would appear to be a requirement of the SIDRA process?

VEHICLE ACCESS. The Planning Proposal Report contains inconsistencies/ambiguity in this area:

- o (p49) states “*appropriate vehicular access to the development is proposed to be provided from Alberto Street, Fred Street and/or Cecily Street*”. This suggests a minimum of two and maximum of three vehicle access points.
- o By comparison, a diagrammatic representation on p18 of Appendix A – Urban Design Report shows access only from Alberto Street.
- o The indicative floor plan on p76 of Annexure A – Urban Design Report shows access only from Alberto Street and Fred Street.
- o The SEPP65 and ADG Compliance information on p83 of Annexure A – Urban Design Report states that “*vehicle access is flexible and includes all street frontages except Balmain Road*”.
- o The absence of specificity illustrated by the above provides insufficient detail to support the conclusion that ingress and egress is equitably distributed across the site. As parking is very limited in Alberto Street

(this issue becomes even more acute with proximity to Balmain Road) we propose further engagement and explicit clarity on vehicle access, including service vehicles for the site.

- o Further, while separation of residential and commercial parking assess is considered, it does not appear to be guaranteed in the Proposal. Given the majority of the precedents drawn upon include separate residential and commercial access, and the potential for poor traffic outcomes, we propose that this separation be guaranteed.

We look forward to a considered response which addresses these concerns and will welcome any opportunity to discuss them in a transparent and collaborative fashion with the Planning Panels Secretariat members, the developer or their representatives and any other impacted stakeholders.

Yours sincerely,



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Planning Panels Secretariat

This development is an opportunity to maintain the uniqueness of our village suburbs for the benefit of residents, businesses, visitors and tourists.

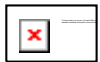
The development should be no higher than 2-4 storeys. The provision of 142 apartments is excessive for this site and outnumbers the existing number of approx 120 homes in the surrounding streets.

The development must include 5-10% affordable housing.

The development should have community space for resident engagement and relaxation, be low profile to prevent overshadowing of neighbours, and have cycle and pedestrian ease of access.

This site is an opportunity to make our suburb stand out as unique, linking our village heritage with interesting and sustainable new development. I have seen many cities overseas see the great benefit of original suburbs and spaces which attract visitors, tourists and businesses for their uniqueness, quietness and human scale.(eg Copenhagen)

Let's put the inner west on the map as an area of heritage with sustainable development, cycle and public transport ease, links to the unique parkland of Callan Park and a destination of great benefit to residents, businesses, visitors and tourists.



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29th October 2019



Planning Panels Secretariat
GPO Box 39
Sydney NSW 2001

By email: PlanComment@planningpanels.nsw.gov.au

Dear Sir/Madam

PLANNING PROPOSAL SUBMISSION

NOTICE OF OBJECTION TO PLANNING PROPOSAL FOR 469-483 BALMAIN ROAD, LILYFIELD.

Reference 2017SCL068 - Inner West – PP_2017_IWEST_018_00

I write to object to the above proposal on a number of issues including those outlined below. I will be happy to elaborate further at any future opportunity including a public meeting.

IMPACT OF THIS PROPOSAL NEEDS TO BE CONSIDERED IN CONTEXT WITH CURRENT AND UPCOMING DEVELOPMENTS

- There are major construction and building works already scheduled to occur in the surrounding area within a 650-meter radius of this proposed planning proposal. The impact of the current proposal needs to be considered as additional to the future level of impact caused by the current constructions and developments.
- There are also two other large developments with ~190 residences (173 and 16 respectively) within 650 meters of this proposed development. The Balmain Leagues Club development will impact significantly on traffic and amenity already. These current developments will significantly impact local amenities, public transport, traffic, parking, school capacity, noise and air pollution, NBN capacity, and social well-being of the community. The current proposal will be adding to this already inflated and over stretched capacity of the local amenities

BUILT FORM AND THE LOCAL STREET SCAPE

- The proposed development is a 6-storey mixed use light industrial and residential block. **This represents a 300-600% increase in height in comparison to the majority of the buildings in Lilyfield, particularly those in the immediate vicinity**
- The vast majority of existing housing in the vicinity are freestanding homes, duplexes and terraces, and the predominant scale and size is single or double storey homes. Local industrial buildings (including the current buildings on the site) are of a similar scale.
- This proposal is neither in keeping with the local area streetscape nor the character of the neighbourhood. There are no buildings of a similar size or density in the local area, so this development would be a significant and unwelcome precedent to set.

- This is exacerbated by the site's elevated location which means it would be highly visible from almost any direction, rather than being a sympathetic development which blends in seamlessly with the existing buildings.
- The visual bulk of the proposal is unprecedented locally. I would also note that the illustrations in the proposal serve to significantly and misleadingly under-state the visual impact of the proposal by excluding upper storeys from many of the illustrations.

SOCIAL IMPACT AND ECOLOGICAL SUSTAINABILITY

- **An increase in high density apartments is not required in this area, i.e. 142 residential apartments and will likely be flooding the local Lilyfield property market. This is especially pertinent due to the 173 residential apartments that are to be built on the busy Victoria road and the 16 additional apartments on Darling St, all within 650m from the proposed development site. The already existing planned developments are going to put an increased strain on the local amenities and an additional development of near the same size will stretch the amenities beyond their capacity**

It would be better suited to the area to introduce a modest high-quality residential accommodation with maintenance of some of the light commercial business, similar to the current development at 731 Darling St. Link: <https://www.realestate.com.au/property-apartment-nsw-rozelle-132284478?pid=project-profile-ppp-600026522-to-pdp-132284478>

- The NBN in our area is currently not managing with the current load. At peak times, streaming is not possible due to poor speeds and overload on the current system. Increasing the NBN use by a further 142 residential apartments (possibly 350 residents) and 130 employees will have detrimental effects.
- Lilyfield is currently a quiet residential area. The concentrated addition of 300+ residences and ~130 employees in the one area will increase noise, pollution, reduce the safety of our children walking and riding in the nearby streets, and will have direct impact socially on the neighbourhood
- Our neighbourhood is currently serviced well with the existing shops in the local areas (i.e. cafes, supermarkets and light retail), especially with the recent opening of a new Woolworths store in Rozelle 850m from the proposed development. The local area does not require any additional retail or services, especially given the new retail and commercial development to occur on corner of Victoria road and Darling St, 650m up the road

LACKING IN GREEN SPACE

The proposal is reliant on the adjacent Callan Park for provision of green space. There is no green space or garden/open space within the development – essentially this is a proposal with significant built form across the whole block.

INCREASED PRESSURE ON LOCAL EDUCATION SERVICES

This development falls into the catchment of Orange Grove Public School which is already at over capacity at 164% utilisation and Sydney Secondary College which is over capacity at oth Balamain and Leichhardt Campuses.

The planning report acknowledges this issue and states that this could be overcome by referral to Rozelle Public School, however Rozelle public is also significantly over 100% capacity. In fact, all schools in the surrounding area are exceeding 100% capacity; including Annandale, Leichhardt, Forest Lodge, Balmain and Nicolson St. These schools are not taking people from outside their boundaries, so this is not a solution to this significant problem

The proposal does not take into account the imminent impact of the 173 residential apartments (Victoria Road) and additional 16 apartments (Darling St) that will soon be built within 650m of the proposed development and the impact these apartments will already have on the local schools and amenities

IMPOSITION ON EXISTING NEIGHBOURS

The proposed development specifically omits the view of how it affects the surrounding neighbours from all of its documentation, and this perspective should be explicitly considered in the assessment of this proposal. The proposal would:

- Significantly overshadow existing homes and gardens where no overshadowing exists today.
- Render a significant loss of privacy to the existing residents through significantly increasing the extent to which private spaces are overlooked.
- Result in a significant increase in noise in the immediate vicinity at all times of the day, from large air conditioning units operating constantly, frequent refuse collection, car ingress and egress, garage doors, communal outdoor spaces on rooftops or balconies. This increase is exacerbated by the extent of residential use proposed as the current light industrial use is primarily restricted to business hours.
- Impact traffic congestion, especially Alberto Street, Fred St, and Cecily St.

PARKING

- The proposal states it will PROVIDE A MAXIMUM OF 182 PARKING SPOTS for the 142 residences.

The proposal does not outline how it will cater for parking for the potential 488+ vehicles and 10+ trucks each day

Likely parking generated by development	
142 residences with a conservative mean of 1.5 vehicles per residence	251 vehicles
Visitors/deliveries with a conservative mean of 0.5 vehicles per residence	71 vehicles
Employee vehicles for the light commercial businesses (the calculation in the traffic report states that of the 130 employees only 14 would take public transport)	116 cars
Customer vehicles for the light commercial businesses	~50 cars
Trucks and delivery vehicles requiring loading bay access for businesses	~10+
Total daily vehicles to gain access to the site and require parking	488+ cars 10+ trucks/vans

- The current street parking is at capacity. It is rare to be able to find on-street parking in this region of Lilyfield. The majority of houses currently rely on on-street parking as they do not have garage or off-street parking access on their properties.

Therefore, this significant increase in high-density residences will significantly impact the local residences, many of which will no longer be able to park near their homes.

- The traffic report submitted with the proposal appears to contain inaccuracies in the statements made around traffic and parking, which alters the potential impact of the proposal
 - The report states that additional parking will be created on Balmain Road. This is inaccurate as currently parking occurs on the entirety of the Balmain Road frontage, including over the one small driveway that is close to Cecily Street, which is not currently used as a driveway access. Therefore, the proposal allows for no additional parking on Balmain Road
 - The report states that access to the building will be provided on Cecily Street. Currently Cecily Street has onsite parking directly across from where the proposed entry will be. As Cecily street only allows for traffic flow in one direction at a time, this on-street parking would have to be removed to allow for the site entrance – **resulting in the immediate reduction of 5 on-street parking spaces on Cecily street**
 - The report also states that an entrance will be created in Fred St, allowing for additional car spaces. Fred St currently contains a very small driveway entrance to the factory building. If this driveway is

extended to allow for the free -passage of the 400+ cars into the building site, then Fred St is likely to **lose an additional 6-8 on-street car spaces** as it is currently 90 degree parking there, which allows for larger numbers of car parks

- The proposed removal of the two driveways in Alberto St will add **2 additional car spaces**
- The ability of the proposal to create multi-storey underground car parks is also now going to be limited by the proposed Westconnex tunnels, which currently are planned to run adjacent to the proposed site

TRAFFIC

The submitted traffic report appears to have many inaccuracies and therefore may be misleading.

- **The current traffic assessment DOES NOT take into account the imminent substantial increase in local traffic that will stem from the 173 residential apartments and retail sector which will be built soon on the corner of Darling St and Victoria Road, and the additional 16 apartments on Darling St, which are both within 650m from the proposed redevelopment (these apartments and retail will already be adding 200-300 additional cars to the local traffic flow problems in the near future).**
- The additional traffic increase from the proposed development report appears to be grossly underestimated, and does not seem to account for the 116 employee cars that will be arriving at the site in morning peak hour, nor visitors, nor customers to the businesses
- ***Significant impact on traffic and Cecily St (a uni-directional road) and intersection at Balmain Rd***

The report states that Cecily Street is a two lane road with traffic flow in each direction.

However Cecily Street is a narrow street (with on-street parking both north AND south of Fred St) that only allows for traffic flow in one direction at a time, meaning cars need to be able to find a place to pull over and allow other cars through before continuing on their journey. Due to this, additional time needs to be considered in calculating traffic congestion for each car driving in Cecily Street.

Even near the traffic lights in Cecily Street (where the new proposed car entrance to the building is to be located) the lane is narrow and only allow for traffic flow in one direction at a time. Therefore the significant increase in the peak time load on this section of road will have much larger impacts than stated.

- ***700% increase to traffic in Fred St***

The report also states that the western end of Fred St (adjacent to the proposed building) has a flow of 20 cars in peak hour. This is grossly overestimated. Fred St is 53 meters in length and primarily caters for on-street parking for the locals in Fred St and the units in Sunnyside court. These cars do not move most days. The traffic flow in Fred St is less than 5 cars per hour at peak time, often there is no traffic flow in this street at all.

Therefore, the additional flow of 35 cars an hour represents a 700% increase to traffic in Fred st, and this is not taking into account the potential additional 116 employee cars that will access the site. This will have significant impact on the local area in both noise, pollution and safety of our children in the local streets

- ***Underestimated impact on weekend traffic on Balmain Rd/Darling St***

The report cites an increase of 50-70 cars at peak times including Saturdays. On Saturday, the traffic on Balmain Road is constantly backed up for 500 meters from Victoria Road all the way to Cecily St. Negotiating this distance in a car usually takes up to 15 minutes on a Saturday. Increasing the traffic by an additional 70 cars at this time will have significant consequences on this already problematic traffic congestion.

- ***Alberto St – significant impact on turning right onto Balmain Rd***

The report states that the visibility is good for entering onto Balmain Road from Alberto St. This is not correct. As Alberto St is slightly down hill from Balmain Road, and vehicles park all along Balmain Road, it is very difficult to see traffic coming in either direction, and it is often needed to enter onto Balmain Road a little to be able to clearly see the traffic. There are many near accidents at this intersection already, and additional traffic flow of 70+ cars an hour will only exacerbate this

OVERSHADOWING - BLOCKAGE OF THE MINIMUM 3 HOURS OF SOLAR ACCESS TO NEIGHBOURING RESIDENCES

- The townhouses directly adjacent to the current building on 469-483 Balmain Road, currently only JUST receive the minimum of 3 hours sunlight between the hours of 9am to 3pm in mid-winter, due to the current height of the building
- The development proposal admits there will be a direct effect on solar access to the nearby residences: stating there will be **REDUCTION** of 1-2 hours of sunlight between 9-3.
- Therefore, by the developers own admission, the proposed building will deny the mandatory sunlight allowance to the nearby residences

OVERLOOKING

The residences on the higher floors will direct look into our living spaces. Some will have direct line of sight into the internal living areas of residents in Fred and Alberto St, reducing our current level of privacy. Most will overlook our back-yard area and this will become unusable



Dear Sir/ Madam,

Development 2017SCL068 - INNER WEST- PP_2017_IWEST_018_00 . 469-483 BALMAIN RD, LILYFIELD

I would like to voice my objection to the proposed height of this development and the development of 142 apartments because:

- It does not fit into the landscape and character of the area
- The increase in population of at least 350 people, will put immense pressure on the area, access and additional traffic stress in an area already at capacity. In addition to an additional 400 people proposed to be residing in the proposed development at Balmain Leagues Club (min 360 residents) and additional businesses there, the area simply does not have the infrastructure to cope with this many residences.
- Schools in the area are full to capacity.
- Bus transport to the city during peak hour is already full to capacity between 8am and 9.30am and in the evening from the city from 5pm to 6.30pm. If I manage to get on a bus it is standing room only. Vehicle access to the city is immensely delayed during peak times currently.
- The average height in the surrounding area is 2 stories and 23 metre Tower will be an eye-store on the landscape and simply does not fit in with the neighbourhood.
- Put stress on parking for local residents, which is already in short supply
- I do not agree the placing of a ventilation tunnel in Alberto st, from the WestConnex by the development
- Will still block airflow from the Bay and take sunlight for residents in Fred Street.
- Increases in population will increase noise pollution of a tranquil area.
- Traffic access to Cecily and Fred st will be under pressure
- Loss of parking in un-zoned areas in Fred street for residents who do not have in residence parking.

I implore you to reconsider your proposal and amend. I would like to see a development alteration which is limited to 2-3 stories and in keeping with the local area.

Planning Proposal we initially support reasonable commercial and/or residential development on this site. [REDACTED], which is directly opposite the site on Alberto Street. As local residents for more than 5 years, we are aware of the scale and zoning that was previously proposed for this site that were submitted to the Council which was unacceptable and we had objected to.

This notification of our objection to **Planning Proposal Number: PP_2017_IWEST_018_00** sets out to both the Planning Panels Secretariat and the site owner, Roche Group, to consider the detrimental impacts which we believe the proposal in its current form will have on our property, our close neighbours and community. The issues raised concern our ability to continue to enjoy our immediate surrounding space without being overlooked, overshadowed and over congested. We believe that amendments to the proposal can allay our concerns and are willing to work collaboratively with all parties to this end. References to pages or sections are to the Planning Proposal Report dated 4 June 2019 (**Planning Proposal Report**) unless otherwise specified.

We submit the following in support of our objection.

HEIGHT. The Planning Proposal Report currently supports a range of heights from one to six/seven storeys at a maximum height of 23m.

- The potential for seven (7) stories is totally unacceptable. All renderings/illustrations, etc., suggest a maximum six (6) stories. We note that even a six story building is not in keeping with the local area.
- The Urban Design Report (Appendix A) notes that the buildings fronting Fred Street are reduced in height to be no taller than the existing buildings fronting the street.
- As residents of Alberto Street, we seek the same consideration as we are directly opposite where the renderings propose 6 stories and will be completely overlooked disturbing our privacy as our balcony faces Alberto Street. See separate privacy objection. In the spirit of pragmatic compromise, it is acknowledged that because the existing apartment structure at 465 Balmain Road (which adjoins our property to the west) is four (4) stories, hence we seek an amendment to the proposed development such that the maximum height at Alberto Street be no more than four (4) stories to match the existing building at 465 Balmain Road. This matches the design principle applied to the Fred Street frontage by applying an appropriate transition to existing houses and creates a human scale pedestrian experience at street level. This will also reduce overshadowing. See separate objection.

ENVIRONMENTAL IMPACT - VEGETATION. The Planning Proposal Report states:

- (p21) “the Site currently contains no vegetation”. Further, (p51) “No significant vegetation removal is required as part of the Proposal”.
- Section 5 (Before & After) of the Urban Design Report states that “blank walls are replaced with friendly facades”
- These statements ignore the significant foliage or green wall on the western front (Alberto Street), which currently provides a beneficial softening/greening effect for all residents, pedestrians and other users of Alberto Street close to Balmain Road. Photographers have also engaged with this green space to take model shots, wedding parties etc. This foliage is clearly illustrated in the “before” renderings on pages 61, 62, 64, 65, 66 & 67 of the Urban Design Report. We have also provided a current photo for your reference
- Explicit assurance is sought in relation to the number of additional street trees to be provided as per Objective 30 (p21) of the Planning Proposal Report.
- Explicit assurance is sought that the developer will do more than “explore potential for green walls and rooves” (sic) and instead commit that that green walls and roofs as illustrated in the Urban design Report will be delivered, with a deeper consideration to have a green wall on the Alberto frontage

OVERSHADOWING. [REDACTED] acknowledged as being one which will “receive some additional shadowing”.

- In our case the overshadowing effect is exacerbated because, our only existing outdoor space of our property will be overshadowed at 6 stories.
- We seek a solution that acknowledges the above and submit that this can be achieved through the proposed height amendment canvassed earlier in this objection.

PRIVACY. It appears likely (based on the Urban Design Report renderings) that many dwellings in the proposed development will overlook the balcony and floor-to-ceiling windows of our bedroom.

We propose that the development include the green wall (as mentioned under vegetation) plus fixed louvres, angled towards Callan Park, for any apartments which have a balcony which faces west to Alberto Street, to ameliorate the loss of privacy.

PARKING. The Proposal reveals that parking provision is not specified.

- A development proposal for 142 dwellings plus commercial space requires more than an unspecified commitment to “a minimum of 114 spaces and a maximum of 182 spaces.”
- We seek a specific commitment to ensure that every residential dwelling in the proposed development has no less than one (1) car space to prevent excessive overflow onto local surrounding streets.
- With Callan Park plus other local sporting and recreational amenities within close proximity, there are days where parking is already a significant problem. This proposal would only exacerbate the situation.

TRAFFIC. The Traffic Report indicates that the unsignalized intersection of Balmain Road with Alberto Street will operate with average delays for the highest delayed movement of less than 35 seconds during peak periods.

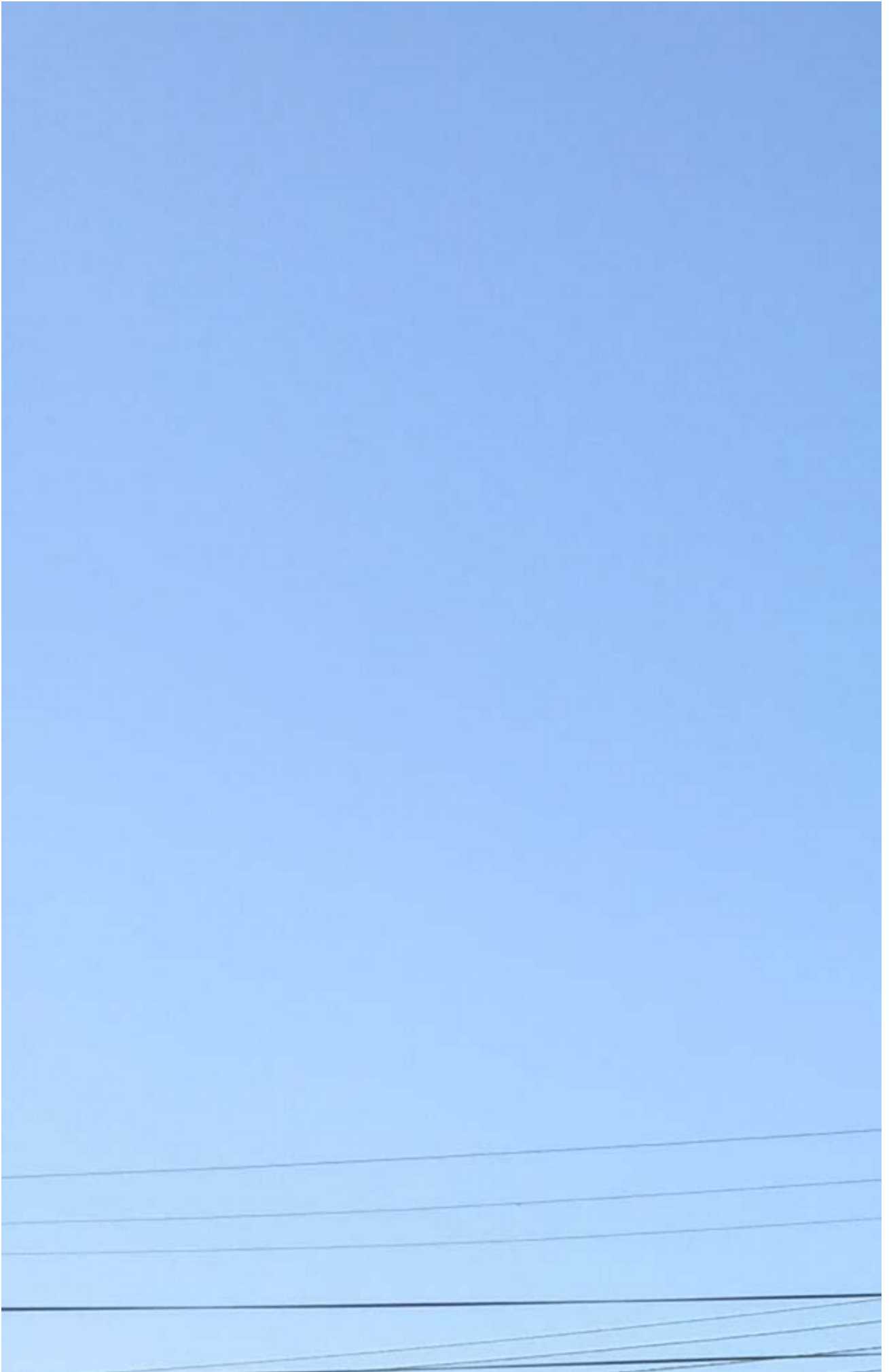
- Our experience living on the street has been that movement from Alberto Street to Balmain Road can often be longer than 35 seconds, particularly on busy weekends. Traffic on Balmain Road is already often adversely affected if multiple vehicles are turning onto Alberto Street, and quite frequently (i.e. a number of times a day) Alberto Street is used as a turn-around point for motorists, which causes confusion and chaos (as is).
- It is claimed that this represents a Level of Service C (a satisfactory level)
- It is claimed in the Traffic Report (p16) that “vehicles waiting to turn right from Alberto Street are able to “see through” vehicles parked on Balmain Road”. This is true only when those parked vehicles are small sedans. When a commercial vehicle (even a van, let alone a large truck) is parked on this corner it dangerously removes sight lines.

- Has an accident study been undertaken? Such a study would appear to be a requirement of the SIDRA process?

VEHICLE ACCESS. The Planning Proposal Report contains inconsistencies/ambiguity in this area:

- (p49) states “*appropriate vehicular access to the development is proposed to be provided from Alberto Street, Fred Street and/or Cecily Street*”. This suggests a minimum of two and maximum of three vehicle access points.
- By comparison, a diagrammatic representation on p18 of Appendix A – Urban Design Report shows access only from Alberto Street.
- The indicative floor plan on p76 of Annexure A – Urban Design Report shows access only from Alberto Street and Fred Street.
- The SEPP65 and ADG Compliance information on p83 of Annexure A – Urban Design Report states that “*vehicle access is flexible and includes all street frontages except Balmain Road*”.
- The absence of specificity illustrated by the above provides insufficient detail to support the conclusion that ingress and egress is equitably distributed across the site. As parking is very limited in Alberto Street (this issue becomes even more acute with proximity to Balmain Road) we propose further engagement and explicit clarity on vehicle access, including service vehicles for the site.
- Further, while separation of residential and commercial parking access is considered, it does not appear to be guaranteed in the Proposal. Given the majority of the precedents drawn upon include separate residential and commercial access, and the potential for poor traffic outcomes, we propose that this separation be guaranteed.

We look forward to a considered response which addresses these concerns and will welcome any opportunity to discuss them in a transparent and collaborative fashion with the Planning Panels Secretariat members, the developer or their representatives and any other impacted stakeholders. We similarly look forward to a detailed scope/timetable of proposed works.



28 October 2019

To whom it may concern,

RE: PLANNING PROPOSAL 2017SCL068 – INNER WEST – PP_IWEST_018_00

Please note the contents of this correspondence as my submission in relation to the above matter. Please also note that I **do not consent** to the publication of any details that could identify me personally as the author of this document, and will not hesitate to initiate legal action should any such publication, or unauthorized release of such information occur.

I have a number of concerns/objections regarding the proposed development of the site at 469-483 Balmain Road, Lilyfield (hereafter referred to as the site).

Please note the points of this submission as follows:

1. Noting the document "Rezoning Review – Appointment as RPA, Record of Decision", I consider the apparent lack of input into this matter by Inner West Council since at least 4 December 2017 most concerning. The precise reasons for this matter remaining with Sydney Eastern City Planning Panel as RPA rather than Inner West Council is not outlined in documents available in this matter. I consider this lack of involvement of the relevant local authority in decisions of such intrinsic importance to the local community tantamount to a denial of natural justice for local ratepayers. Allowing these important decisions to be made by an authority arguably with a far lesser connection to the local community affected is of significant concern.
2. I note the site is currently zoned as light industrial in accordance with Leichhardt Local Environment Plan (LEP) 2013. This currently does not allow for a residential component for the site without proposed changes to regulations. I am opposed to a change in zoning regulations that would allow for such a significant over-development of the site in the form of residential apartments.
3. Regarding the Development Control Plan 2019 for the site:
 - Though the document notes a preference for the taller building structures to be at the Balmain Road side of the site, it does not recognize that the sheer scale of the proposed development (ie 6 storeys at it's peak) is *significantly* out of scale in comparison to local surrounds. The document is quite contradictory in nature, at times paying homage to the unique style and character of the Nanny Goat Hill community, only to be supportive of placing a massive, modern apartment building right in the middle of the same neighbourhood. I believe this fact alone shows how out of step authorities are with local community expectations. Has no one taken notice of the opposition to the ongoing

proposed over-development of the former Balmain Leagues Club or the regular proposals for the same over-development of the Callan Park precinct?

- Under 3.4 Building Design, control measure C1 – “Buildings [sic] elements, including balconies, entries, roof features and screening are to contribute to the character of the streetscape and the quality of the building design” – what does this mean? This is an extremely subjective statement. How is this a measurable control for the developer to be required to adhere to such non-specific objectives? This control measure is meaningless without identifiable and enforceable specifics to which the developer must adhere.
- Under 3.6 Open space and landscape, control measure C2 – “Opportunities for green walls, green roofs and communal gardens with the Site are to be explored”. Similar to my last point, how can something so non-binding be put forward as a viable control measure? This measure places zero onus on the developer to consider the appearance of the structure from the outside through the use of green walls, other than to document the fact that “they thought about it”. In no way is this a meaningful control measure.
- Under 3.7 Access and parking – arguably the most important aspect of the plan for the local community given the undeniable impact on parking and traffic in the area – the plan has nothing of significance to note. Apart from a note to “encourage” the use of public and alternate forms of transport and some non-specifics regarding building access, the plan is silent on the critical issues of parking and traffic management. Very disappointing.

4. With reference to the Social Impact Assessment by Hill PDA Consulting – I note the document was prepared for Roche Group as the proposed developer of the site, so I must immediately question the impartiality and integrity of the document when the developer has paid for the preparation of this report. With the developer commissioning the preparation of documents on which decisions regarding the viability of the proposed development will be assessed, how likely is it that any of those reports will be critical or non-supportive of the proposed development? Any process that allows for such a clear conflict of interest to occur during the preparation of material critically used to assess the viability of a matter is a process that is fatally flawed from the outset.

- I note the report estimates the population of the site at a total of 250 persons (page 24), which I find likely to be very much on the conservative side when considering the mix of 1,2 and 3 bedroom apartments amongst the total proposed 142 apartments for the site. The methodology used in estimating age groupings likely within apartments at the site is fundamentally flawed, noting broader statistics regarding an aging population without any context suggesting the likely uptake of inner-city apartment living amongst older Australians. To the contrary, 2016 Australian Bureau of Statistics (ABS) data suggests that collectively, those aged 65 and over make up less than 10% of those Australians living in apartments. Statistically apartment living is significantly favoured by younger age groups.¹ The result of the analysis in the Social Impact Assessment is a somewhat self-serving conclusion that with fewer children likely moving into apartments at the site there will be

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<https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0~2016~Main%20Features~Apartment%20Living~20>

no drain on local services associated with young children. I find this conclusion unsustainable based on the analysis provided.

- On page 32 the report notes “the provision of medium and high density housing forms is likely to change the low density character of the area. This could result in the sense of a ‘busier’ locality overall”. Despite the obviously careful choice of words here, it is clear that the scale of the proposed development, significant increase in localized population, and inevitable issues associated with parking and local traffic, the clear intention here is to minimize outlining any potential negatives associated with the development.
- Despite all of the issues raised in this report, the glaring omission is the social impact from sitting in traffic on all street frontages to the site given the inevitable influx of traffic and parking-related issues associated with bringing well over 100 new cars into the area. I find it most concerning that traffic and parking does not rate even a token mention in a report concerning the social impact of a major development.

5. I note the Economic Impact Assessment, also prepared by Hill PDA Consulting at the request of the developer, is equally glowing in terms of the economic benefits the development will bring, with nary a mention of any negatives associated with the scale of the proposed development.

- Page 17 notes how the site is currently under-utilised, and is supportive of the development from the economic perspective of creating a more intensive industrial use of the site. No mention here that the clear economic driver for the development has little to do increasing the utility of industrial use of the site, rather than profiting from building 142 residential apartments on the site. I find this aspect of the report most disingenuous.
- Page 25 outlines some of the assumptions for employment created under the proposal. I question the science applied here that suggests the redevelopment will see an almost doubling of employment opportunities provided by businesses taking up the reprovisioned space. The figures include an allocation of “work at home” positions, linked to the residential component of the proposed development, which should not be included in a discussion of like-for-like analysis of the industrial component of the development. Likewise for the “economic benefits” the repurposed industrial space will provide. I would contend we cannot possibly predict the numbers of future employees for the site (and thus wage costs, etc) when we have absolutely no idea what type of business is likely to seek to utilize the space. I note the figures used here assess that the workers incoming to businesses under the proposal will be paid \$13,000-\$25,000 more per annum than those currently employed at the site –convenient assumptions that artificially inflate the economic benefits of the proposal. Will existing businesses be in a position to be preserved, or will they be lost when their rents are almost certainly increased? What are the demographics of the workers currently on site? Will they be likely to find alternative work or will this proposal condemn a significant number of existing workers to the unemployment lines? Where is the evidence for the claim that a redeveloped site “would result in a more intensive use of non-residential/employment space on the site”?
- On page 29 the report states “Redevelopment of the ageing building on the subject site is unviable under the current FSR and land use controls”. Perhaps it would be more transparent to note that by relaxing the current FSR any potential developer of the site

would profit better by over-subscription of residential apartments to the site. Is there any evidence to support the inference that developers see repurposing of the site under current planning instruments unviable?

6. With regard to the Detailed Site Investigation, also prepared by consultants on behalf of the developer, given the degree to which contaminants such as lead, tar and asbestos are present (or suspected to be present) the remediation process for any redevelopment of the site requires significant scrutiny, preferably at EPA level, to ensure works are completed to the required standard with no risks presented to the local community as a result.
7. Regarding the Traffic Report, in this instance prepared by Colston Budd Rogers and Kafes Pty Ltd on behalf of the developer, I have numerous issues:
 - Para 2.14 estimates the site will house “170 residents with a job”. Based on analysis of age demographics published in the Social Impact Statement, along with the realities of older Australians working later into life, I suspect significantly more than 170 residents will be working, meaning that a number greater than that suggested will require access to transport. Similar demands on transport will be required even for those not working, in the form of children being taken to school/day care. Suggesting that only 170 people will come onto the site as a result of the proposed development and require regular transport is a misrepresentation of the likely impact to transport as a result of the development.
 - Para 2.16 notes an estimated 130 employees travelling to the site. Though the context is not clear, I believe this figure relates to the estimated number of regular employees that would be working at the various businesses proposed to be tenants at the site post-development. The same paragraph estimates that of these 130 people, a maximum estimated 15 people would use public transport. Presumably then the remaining 115 people would either walk, cycle or drive. No estimates of the number of employees expected to drive to the site is offered.
 - Table 2.1 provides for between 24 and 40 parking spaces for industrial use. One would have to presume that the developer would be looking to lean as far towards the minimum required as possible. Even were 40 industrial spaces provided, this would likely fall far short of offering sufficient spaces for employees likely to drive to work. The result would be a significant increase to the already dire availability of street parking in the neighbourhood. This is unacceptable.
 - The same table makes provision for a minimum of 77 spaces for residents of the 142 proposed apartments, to a maximum of 124 spaces. At best this does not even allow for a parking space for each apartment. At worst only a little over half of all proposed apartments would have access to a single parking space. Whilst it is certain to be the case that the owner/tenant of each apartment would not necessarily own a motor vehicle, how many residents moving into these apartments are likely to have multiple vehicles? ABS data states that in 2016, 47% of Australian apartment households had one motor

vehicle, 16% had two, and 3.1% had three.² Using those figures as a basis, we could expect approximately 123.2 vehicles across the population at the site. This is a strong argument to enforce upon the developer the need for the maximum 124 spaces to be conditional upon any approval. With a projected population of 250 in the complex, which I believe is likely to be significantly underestimated, the report indicates a total of between 13-18 visitor spaces be allocated. In peak times, assuming that residents don't use those spaces inappropriately themselves, this will be woefully inadequate to provide sufficient visitor parking to such a large apartment building. I challenge every member of the assessment panel to visit the neighbourhood about 6.00pm on any given day, or over the weekend, and count the legally available street parking spaces in the block around the site. Stop for a moment to consider the effect on residents in the area, most of whom do not have access to off-street parking, of the scale of this proposed development and the massive under-subscription of parking spaces that would adequately service the significant number of vehicles the development would bring into the area. Parking in the area is a big issue, and this report (unwittingly) highlights just how much worse this development would make the situation.

- Para 2.24 notes removing existing driveways to the site will improve parking on relevant streets (presumably by returning 2-3 street parking spaces), but makes no mention of how many existing street parking spaces will subsequently be *lost* when alternate access points are determined.
- Para 2.29 talks of traffic generated by the proposed development having it's greatest effect during weekday peak periods. Clearly the author of the report has not spent any time in the area during weekends when weekend sport traffic in and out of Callan Park makes the intersection at Balmain Road and Cecily Street busy for most of the morning and part of the afternoon on Saturday and Sunday.
- Para 2.13 extrapolates estimated vehicle numbers generated by the proposed development based on the same understated vehicle/population numbers previously outlined. The claim that the figures provided are "modest traffic generations" is totally unsustainable. These numbers I believe are significantly understated and based on flawed assumptions. The likely real impact of traffic generated directly by the influx of so many vehicles into this small area will be significant for local streets.
- Data in Table 2.2 is of concern. The assumptions made to generate figures in this table are based on a number of over-simplified and unsubstantiated matters including the likely number of vehicles resident at the site, the location of access points, and number of employees driving to work. This table should not be used to estimate traffic impact in any way.
- Paragraphs 2.35-2.43 are based on the same flawed assumptions and logic as outlined above, and should not be relied upon in any way to present a likely accurate picture of the traffic impact of the proposed development. I believe the real number of vehicles likely to be utilizing the site daily will have a very significant impact on traffic on Balmain Road, Cecily Street and Alberto Street, as well as a number of local streets intersecting

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<https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0~2016~Main%20Features~Apartment%20Living~20>

those. With the only traffic lights servicing the area located at Balmain Road and Cecily Street, the delays in moving through the precinct will be made substantially worse during peak times, and noticeably worse at others. The fact that there are no left or right turn signals for traffic in any direction at these lights will be enormously problematic for local residents. I believe this development would like turn the Balmain Road/Cecily Street intersection into a substantial bottleneck that will further choke already heavy traffic on Balmain Road between Darling Street and Perry Street.

8. Regarding the Rezoning Review Record of Decision, I would argue that the proposed development fails to satisfy the following outlined conditions:

- “Include a provision that enables residential development to occur on the site subject to meeting objectives which include but are not limited to: a. retain the viability of industrial uses on the site; b. no detrimental impact on the uses (current or future) on the adjoining IN2 zoned land”. In my view there are numerous detrimental impacts on the surrounding area, including, but not limited to, a substantial impact on already strained street parking in the area, as well as a grossly understated impact on traffic flows through the area should the development proceed as planned. The size of the buildings proposed is an additional issue out of step with the tolerance for development in the area.
- “Ensure a rationale for the height, floor space ratio, and building massing and modulation for the site is prepared and exhibited with the planning proposal.” The advantages associated with the scale of the proposed development as articulated are flimsy at best. Positives noted include improving local housing affordability and increasing the stock of residential properties. In my view, the opportunities for unsustainable over-development in the local area will be significantly increased by the proposed changes to zoning regulations. The current zoning regulations should not be changed in any way. There is a lot of talk in supporting documentation about the objectives for the development being focused on the redevelopment/reprovisioning of the industrial segment of the site, but the real purpose of the development is to generate maximum ROI for the developer by over-subscription of residential apartments for the site.

9. Regarding the Planning Proposal Report, I similarly have a number of issues:

- Pages 7 and 8 outline the executive summary (reproduced below with *my comments*):

The Proposal will continue to support local employment whilst providing much needed additional housing and making a positive contribution to the Balmain Road streetscape. *The extent to which local employment will be supported is very much up for debate given the nature of assumptions made in the economic impact report. Similarly the streetscape improvement is far from guaranteed given no assurance the developer needs to do anything other than to “consider” issues such as green walls, etc.*

The Proposal will result in no net loss of industrial floor space, and the provision of an adaptable modern employment space will increase employment density and ensure the ongoing presence and viability of light industrial and creative uses on the Site. *As above –*

there is nothing to suggest with any certainty the proposal will increase employment density nor anything to even suggest the developer is required to produce "an adaptable modern employment space" (what does this even mean?).

The Proposal will retain a similar amount of creative floorspace. Similar? What does this mean? More? Less? Without anything in writing to specify there is no guarantee for the preservation of creative floorspace.

Market evidence (HillPDA) suggests that it is unlikely that there would be a commercially viable redevelopment option for the Site for a traditional, standalone light industrial development. As previously stated, this assertion is based on selective use of data and related analysis to generate figures that I do not believe stand up to any form of scrutiny. Even were this to be the case, there is no justification for the scale of residential component as proposed.

The Proposal is for a mix of 1, 2 and 3 bedroom apartments, which will add to the diversity of housing stock in the area increasing local affordability. I see no real evidence of meaningful analysis suggesting the creation of additional apartments as proposed will effect affordability in the area. A short-term addition of supply of apartments will likely not yield any observable longer-term trend of lower prices/greater affordability for apartments in the area.

The Proposal will increase permeability and improve the public domain and streetscape around the Site. As previously noted, I see nothing to hold the developer to account for this very subjective goal. "Improving the streetscape" can be interpreted to mean a lot of very different things.

The Proposal will result in a more intensive use of space and increase in employment in a locality with good access to transport and employment including a proposed Technology Park at White Bay. What does the (currently non-existent) proposed Technology Park have to with this proposal? The site is a couple of kilometres away from White Bay. The claim that the development will provide an increase in employment is untested and cannot be sustained in the context of this proposal.

Traffic generation associated with the Proposal can be accommodated within the existing road network. This claim is based on faulty assumptions and unsound analysis, and to be a frank, a total and complete disregard for the likely impact on residents in the area.

- Page 8 states "This proposal provides a catalyst for renewal of a key industrial landholding that would otherwise not be redeveloped and would remain underutilized". I object to the emotive and unsupported assertions in this statement. What makes this landholding a "key landholding"? What is the criteria for a landholding being defined as "key"? Where is the evidence that Roche is the only developer that would conceivably entertain the idea of developing the site? How is it assessed that the site is "underutilized"?
- Page 11 notes the highest point of the current structure on the site is 14m, with the proposed development seeking to increase the maximum height to 23m. This almost doubling of the height of the proposed structure is a significant over-development of the site that should not be permitted.
- Page 30, Principle 6 – Traffic Generation, states in part "... since traffic congestion is considered a significant issue in the locality, traffic associated with any redevelopment of the Site should have minimal impacts on the local road network. ... Traffic analysis shows

minimal impact on the surrounding area and redevelopment will likely result in improved amenity for surrounding residential uses." The first sentence shown here is 100% correct. The narrow streets and relative lack of off-street parking is a very significant issue in Lilyfield. The remainder of this claim is totally unsupported and should be disregarded. The assumptions made in the traffic analysis report are clearly understated so as to minimize the projected number of vehicles likely to require parking at the site and use local roads for access. There is absolutely no support for any claim that amenity will be improved for residents. This claim alone throws the credibility of the entire report into question.

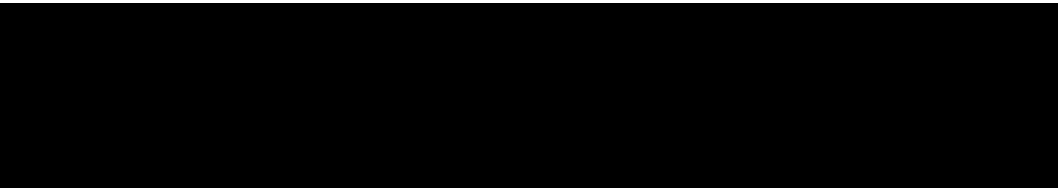
- Page 31 – I note despite outlining broader pursuits of affordable housing for the community, there is no commitment for the proposal to make any allowance for same. Part 6.5 Summary of benefits repeats the aforementioned unsupported assumptions in arriving at facts and figures showing a positive future for all should the development go ahead – most of these assumptions are clearly modelled on a "best case" scenario and cannot be relied upon.
- Perhaps unsurprisingly, there is no section in the report summarizing detriments.
- Section 11.3.2 points us to precedents presumably for us to consider as successful examples of similar developments. Examples given, including East Village and 97-101 Pyrmont Bridge Road, bear no similarity in context to the proposed redevelopment of the site.
- Page 48 Traffic Impact – just by repeating the same understated vehicle occupancy and flawed analysis of vehicle movements around the site doesn't make it true. The strain on existing road infrastructure immediately around the site is already over-stretched during peak periods – ask any local resident. The selective use of data and modelling to understate the impact of the development from a traffic perspective I believe warrants further scrutiny.

10. I daresay it has become apparent by now that I am strongly opposed to the development in its current form. The fact that so much of the material generated in support of the developer's contentions was paid for by the developer should create an immediate suspicion on the part of any body assessing the proposal that there is a significant lack of objectivity and integrity in the supporting material. The issues outlined in this correspondence should subject this matter to further scrutiny. The scale of the development is greatly out of step with community expectations, and I strongly suspect will result in protests from locals in a variety of forms, if not now then certainly as the matter progresses. Personally I would absolutely consider any available options to take legal action to prevent further progress of the matter in its current form.

11. Please note I am not opposed to any and all development within the local area. I accept the economic and social benefits of controlled, sustainable and consultative development generally. My opposition to this development comes with the sheer scale of the proposed residential component of the proposed development, and the overwhelming likelihood of a detrimental impact on the lifestyle of those residents already living in the area. I do not accept the impartiality and integrity of the various consultant reports facilitated by the developer as a true and accurate representation of the likely outcomes from this proposed development. I further do not accept

that the re-development of the industrial aspect of the site is the primary purpose behind the proposed development.

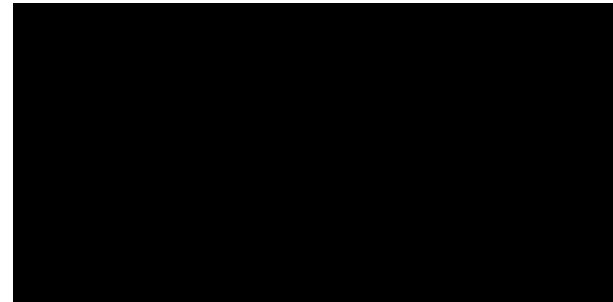




I oppose the current proposal for the following reasons;

- Increase in FSR to 2.54:1, when existing is 1:1 & surrounding properties are 0.5:1 or 1:1
- Increase in number of workers & occupants (1200 works & 142 dwellings)
- Significant increase in traffic & congestion, in already congested area.
- Bulk, height & scale compared to surrounding area

The proposed development will dwarf its surroundings and deliver a large increase to traffic in an already congested area.



Kim Holt

From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Tuesday, 29 October 2019 4:17 PM
To: DPE PS ePlanning Mailbox
Subject: Webform submission from: Amendments to Leichhardt Local Environment Plan 2013 > Content

Submitted on Tue, 29/10/2019 - 16:17

Submitted by: Anonymous

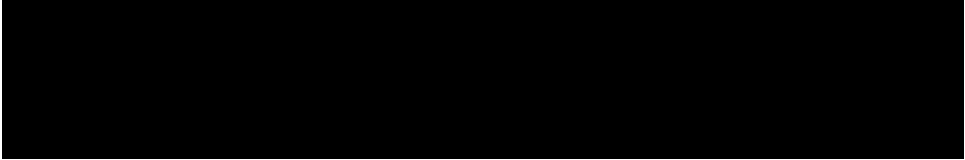
Submitted values are:

Submission Type:I am making a personal submission

Submission file: [webform_submission:values:submission_file]

Submission: This Proposal will significantly reduce the amenity of existing residents. - Reduced Privacy & Solar Access. The proposed unit block on the ridge of Nanny Goat Hill will overlook & overshadow existing properties private open space and windows due natural typography and size/height of proposal. - Increased Traffic & Parking Problems. Darling Street is already at capacity during morning rush particular on Saturday morning. Parking will overflow into Callan Park area and thus reduce the ability of local residents to access park. Callan park will become a parking overflow area for this proposal. - 280+ residents will put additional pressure on local services and schools, which are already operating above capacity. This Proposal will negatively affect the character of the suburb. The proposed unit block not sympathetic to the existing character of the suburb nor the site's typography. As it is sited on the ridge it will dominate the local landscape and be seen from The Anzac and Harbour bridges as an ugly node defining the suburb. Existing Local unit development has been limited to 3-4 storeys. This proposal is doubled any existing precedent. This unit block will also dominate Callan Park. This proposal is an excessive overdevelopment of the site, which will be detrimental to the character of the suburb and the amenity of existing residents.

URL: <https://pp.planningportal.nsw.gov.au/exhibition/amendments-leichhardt-local-environment-plan-2013>



I oppose the current proposal for the following reasons;

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21st October 2019

Planning Panels Secretariat
GPO Box 39
Sydney NSW 2001

By email: PlanComment@planningpanels.nsw.gov.au

Dear Sir/Madam

PLANNING PROPOSAL SUBMISSION

NOTICE OF OBJECTION TO PLANNING PROPOSAL FOR 469-483 BALMAIN ROAD, LILYFIELD.

Reference 2017SCL068 - Inner West – PP_2017_IWEST_018_00

I write to object to the above proposal on a number of issues including those outlined below. I will be happy to elaborate further at any future opportunity including a public meeting.

1. BUILT FORM AND THE LOCAL STREET SCAPE

The proposed development is a 6-storey mixed use light industrial and residential block.

The vast majority of existing housing in the vicinity are freestanding homes, duplexes and terraces, and the predominant scale and size is single or double storey homes. Local industrial buildings (including the current buildings on the site) are of a similar scale.

This proposal is neither in keeping with the local area streetscape nor the character of the neighbourhood. There are no buildings of a similar size or density in the local area, so this development would be a significant and unwelcome precedent to set.

This is exacerbated by the site's elevated location which means it would be highly visible from almost any direction, rather than being a sympathetic development which blends in seamlessly with the existing buildings.

The visual bulk of the proposal is unprecedented locally. I would also note that the illustrations in the proposal serve to significantly and misleadingly under-state the visual impact of the proposal by excluding upper storeys from many of the illustrations.

Finally, there is a worrying absence of garden space and open space within the development – essentially this is a proposal with significant built form across the whole block.

2. IMPOSITION ON EXISTING NEIGHBOURS

The proposed development would:

- Significantly overshadow existing homes and gardens where no overshadowing exists today.
- Render a significant loss of privacy to the existing residents through significantly increasing the extent to which private spaces are overlooked.

- Result in a significant increase in noise in the immediate vicinity at all times of the day, from large air conditioning units operating constantly, frequent refuse collection, car ingress and egress, garage doors, communal outdoor spaces on rooftops or balconies. This increase is exacerbated by the extent of residential use proposed as the current light industrial use is primarily restricted to business hours.
- Impact traffic congestion, especially turning right out of Alberto Street in peak times.

I include below a picture from our rear garden showing that it is currently minimally overlooked by the current buildings. I estimate that the proposal may lead to our garden being overlooked by up to 50 separate apartments. This is clearly unacceptable.



The proposal omits this view from all of its documentation, and this perspective should be explicitly considered in the assessment of this proposal.

3. THE FOOTPATH

The proposal makes a virtue of a proposed footpath between the site and 14-22 Alberto Street. This footpath has the potential for unacceptable additional light, noise and foot-traffic alongside our properties, especially at night. I would recommend that this be reconsidered by providing access through the new development rather than alongside it.

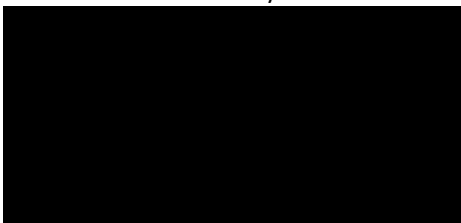
4. ALIGNMENT WITH PREVIOUS PLANNING PRINCIPLES FOR THE SITE

The proposal includes an analysis against the previous planning principles for the site. I summarise their point of view in the table below, together with my perspective on the proposal. There are clearly many objectionable ways in which this proposal is inconsistent with these principles.

Principle	The proposal view	My perspective
Heritage conservation	The proposal retains heritage and is consistent	I do not object on this basis
Land use	The proposal increases employment for industrial purposes	I do not object on this basis
Local amenity	The proposal outlines significant impact on local amenity	I object to this significant deterioration in local amenity especially overshadowing, overlooking, noise and traffic impacts.
Built form	The building significantly changes the built form and dramatically increases the building envelope.	I object to this significant deviation from the previously determined planning principle for the site as described above.
Parking and vehicular access	Parking is sufficient and included in the basement levels	I object to the scale of residential use and the resultant parking and noise impacts arising. The impact of visitors, guests or temporary short-term use of the residential apartments must also be considered.
Traffic generation	Traffic impact is minimal.	I find this conclusion hard to understand given the local traffic congestion, the difficulty of access to Balmain Road from Cecily and Alberto Street. I believe that this should be re-examined, especially in peak hours and on Saturdays.
Site permeability	Public pedestrian connection should be provided through the site.	I object to the proposed footpath alongside the site rather than through the site, as outlined above.
Open space	The principle is met through development at podium/rooftop levels and footpaths	I object to the limited open space/garden within the development. It is essentially built form across the whole block.
Ecological sustainability	The development is intrinsically sustainable.	I object to the representation that this is intrinsically ecologically sustainable – any development of this density will lead to a significant use of power and air-conditioning. A reduction in density will likely improve ecological sustainability.

I will be happy to elaborate further at any time.

Yours Sincerely



2017SCL068 - Inner West - PP_2017_IWEST_018_00 469-483 Balmain Road Lilyfield - Planning Proposal - Objection

To whom it may concern,

I am a resident residing at 14 Cecily St Lilyfield and **strongly object** to the **proposed development 469-483 Balmain Road, Lilyfield** on the grounds of:

1. This development is completely out of keeping with the neighbourhood. Our surrounds comprise of one and two storey houses, industrial buildings up to 2 stories and terraces. How is a 6 story building, 23 metres tall accommodating 142 dwellings in keeping with the area? This is triple the height of the surrounding buildings and houses. The height of this development would also restrict sunlight on neighbouring properties. I recently completed a residential renovation that required a DA approval and part of this was to ensure that my building was not overshadowing my neighbours. Could you please advise why Developers seem to be exempt from this rule? How can they get away with overshadowing multiple neighbouring properties. We all have the right to sunlight and privacy, and I see that this will be greatly impacted by allowing this scale of building to be erected.

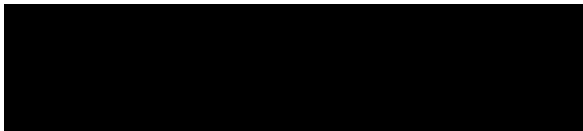
2. Reduced on street parking for existing residents. Referring to table 2.1 in Appendix B Traffic Report - it is not clear whether the max spaces will be provided or only the minimum? What about visitor parking? Will this be provided? Most existing residents park on the street as we don't have off street parking. I myself often park in Fred St because there is no parking in Cecily street (especially in the evenings). With 142 new dwellings in the area - which don't take into account visitors (?) this will mean I will need to park in neighbouring streets. This will be further impacted by the Westconnex project that will bring hundreds of workers and their cars into our area in 2020.

3. Inadequate public transport to support the additional population - Appendix B Traffic report has a rather vague study on transport. It mentioned "in the period 7am-9am on weekdays, there are some 25 to 30 bus services which stop adjacent to the Site." I am not sure which services it is referring to but would like to point out there is only one bus (440 - stop opp Sydney College of the Arts, Balmain Rd) that goes directly to the city. I catch this most days. The current timetable only has 15 buses during 7am-9am which is nowhere near the 25-30 stated in the appendix. I would also like to point out that these buses are often late and/or cancelled. The appendix also mentioned that there are buses on Victoria road to the city. These are crowded and again often late or cancelled. I often need to wait whilst a number of full buses go past until one comes along that I can actually get on. The light rail option to the city is also extremely crowded - I have given up using this option because I never get a seat. I realise that not everyone works in the city but thought I would provide this insight.

Lastly, I would like to mention that one of the reasons I moved into this area was because of the historical nature and character of buildings and houses. This is a beautiful community and we are very lucky to have Callan park nearby. The streets are lined with beautiful terraces and cottages which have been preserved by the local council's strict regulations to preserve the "streetscape". I understand that people need to be housed, but my understanding from council is that the inner west has more than met its housing quota? Why change the streetscape and create more congestion in a currently peaceful area? Why does every suburb need to become a mass of high rise residential buildings – which in recent times are poorly built and; most often "eyesores" and dated before even been completed (e.g. North Ryde development).

There are a few points that I have raised in this letter which may well be under the Inner West Council jurisdiction so I have also copied the Mayor, Clr Darcy Byrne. I would also like to say that I am very disappointed that this proposal was not dealt with at the council level.

Yours sincerely

A large black rectangular box redacting the signature of the sender.

22nd October 2019

Planning Panels Secretariat
GPO Box 39
Sydney NSW 2001

By email: PlanComment@planningpanels.nsw.gov.au

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