

Victoria Road Planning Proposal

Strategic Urban Design Review



Victoria Road Precinct 1943 Source: Six Maps

Roderick Simpson 23 October 2015

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1 Background

Roderick Simpson of simpson+wilson strategic urban design +architecture was asked by Marrickville Council to provide advice in relation to the Planning Proposal for the Victoria Road Precinct. The advice is intended to be wide ranging and to comment on the following aspects in particular.

1.1 Provide comment on all elements of the proposal with focus on Sections 4 & 5 (Design Principles & Master plan)

- (a) The scale and overall heights (in the immediate and broader landscape setting) of predominantly residential development proposed for the southern part of the precinct; and
- (b) The street wall proposed along Victoria Road.
- (c) The layout and arrangement of buildings relative to open space, paths, landscape and existing and proposed street networks
- (d) Any other general strategic urban design advice

1.2 Note any unresolved issues, missed opportunities or overlooked constraints.

2 Introduction.

Whilst urban design is primarily concerned with the design of the public domain; the networks of streets, parks and open space, it is also concerned with the scale and grain of buildings that define these spaces and contribute to the character of the place. Commenting on the physical aspects of a design without considering the future character and role of a place is almost meaningless.

Although there is no specific request to comment on the proposal to rezone part of the subject area from industrial to residential uses, this is a key issue, and addressing it is unavoidable, as it will affect building form, street layout and pedestrian and cycle linkages as well as the distribution of open space.

There is no current formal subregional strategy for the area. However there are clear statements contained in a number of reports, and in the Bankstown-Sydenham Urban Renewal Corridor Strategy that provide the basis for a 'vision' of the future role and character of the area. The Marrickville Strategic Community Plan sets out a number of priorities.

The Marrickville Employment Lands Study recommended that a Precinct Plan for the entire Marrickville-Sydenham Employment area be developed. This has not commenced.

The articulation of a vision, the role and character of the area, and the priorities for the wider LGA is important because the various actions and proposals can then be evaluated in relation to their consistency and contribution to the achievement of the vision, even in the absence of a specific precinct plan.

3 The future role and character of the area

3.1 The vision for the area

The vision for the area may be defined or 'synthesised' by reference to a number of statements contained in various documents.

Bankstown-Sydenham Urban Renewal Corridor Strategy, Sydenham Precinct:

"A more intensive and diverse business precinct taking advantage of its proximity to the city and inner west." p11

"Jobs: Increase the range of permissible business activities within the Sydenham enterprise area including creative industries and start-up businesses." p10

"Employment: It is anticipated that Sydenham, an area that has traditionally been dominated by industrial activities, will have more businesses with lighter industrial activities, such as food manufacturing and distribution. Additionally it is expected that more 'creative' sectors will occupy the business areas in Sydenham." P14

Marrickville Employment Lands Study.

The MELS recommends retention of the industrial zoning, but also recognizes the shift towards higher intensity and 'creative industries' as well as live music and specialised food and beverage manufacture.

"....the 2008 Employment Land Study which noted that while in general employment land should be preserved, declining manufacturing sectors and increasing advanced professional and service sector employment mean that provision should be made to allow a wider range of uses at sites where manufacturing land uses are minor to provide a smoother transition of older industrial stock". Piii

"It is evident that inner urban industrial land use is changing. Traditional industrial uses are moving away from inner urban areas, 'pulled' to undeveloped large vacant and unencumbered land. Urban manufacturers are visible in Marrickville. These are firms for whom innovation and creativity are at the core of their business. These firms benefit greatly from the agglomeration benefits presented. There is evidence of an informal economy in Marrickville's industrial areas – particularly within the Marrickville-Sydenham precinct. Businesses in the area are attracted by low rents, lack of neighbour complaints, short supply chains and relatively close proximity to the CBD. The mix of uses adds to the character of the area and makes for an interesting and fine-grained urban environment." Pvi

The MELS also recognises the desirability and potential for **some specific forms of residential** to support these changes by referring to the recent City of Sydney's Employment Lands Strategy – the Employment Lands and Associated Draft Development Control Plan Amendment (14 June 2014) which includes a potential way forward in negotiating this tension between the demand for jresidential and industrial uses:

"....through planning for affordable housing opportunities in the proposed B7 Business Park zone, coupled with an affordable housing contribution scheme. This will ensure that there is provision made for housing to suit 'key workers' that will be employed in the area. Importantly, this strategy sits alongside a commitment to maintaining a core industrial zone in the South West part of the City that will continue to accommodate 'traditional industrial' uses."

It should be noted that this **specific** objective; the provision of **affordable housing** related to, and **supporting the new and emerging activities** in the precinct, might be the basis and rationale for **allowing any residential** in areas subject to ANEF25 and more, and could be considered a '**strategy**' in the terms of the Ministerial direction.

3.2 Priorities for the LGA

The Marrickville Community Strategic Plan sets out a number of clear priorities. These are attached Section 8. Given the future role and directions for the precinct outlined above, those priorities most relevant for the Precinct are as follows, with possible responses and implications in brackets: (author's emphasis)

- Addressing the complex problem of **housing affordability** in our inner city area (affordable short-medium term (up to 5 years) housing for key workers and workers related to the local industrial and activities in the wider Marrickville-Sydenham precinct)
- Completing our major projects and providing our community with **essential facilities such as recreational facilities** (rationalisation and increase in in open space and provision of additional recreation facilities for workers and residents)
- **Renewing our ageing infrastructure** in a difficult financial environment (definition and establishment of framework for contributions, that may consider VPAs, tradable development rights, levies, incentives and bonuses)
- Nurturing our urban environment and dealing with the **challenges of climate change** (urban greening and innovation in parking management, travel demand and promotion of active travel)

4 Summary: vision statement and strategic priorities

The Victoria Road precinct will become a more intensive and diverse business precinct taking advantage of its proximity to the city and inner west. It is anticipated that Sydenham, an area that has traditionally been dominated by industrial activities, will have more businesses with lighter industrial activities, such as food manufacturing and distribution. Additionally it is expected that more 'creative' sectors will occupy the business areas in Sydenham.

The shift to the higher order and more intense activities will be supported and enabled by the creation of a finer-grain street and road network. Streets and lanes will be given distinct roles with some giving priority to the creation of a calm safe and attractive pedestrian environment, while others will be primarily for service functions. With the exception of major through routes (Victoria Road), all streets will be designed to calm traffic and lower speeds, some streets given distinct roles.

The development of fine grain buildings and the retention of a number of 'character' buildings that contribute to the interesting and diverse character of the area will be facilitated by a precinct wide approach to car parking provision in strategic and convenient locations.

The retention of the existing subdivision pattern as far as possible will be a key determinant of the future character.

Site amalgamations should be avoided, or where necessary for efficient delivery of services should have a 'legacy subdivision pattern' after the creation of new streets and lanes or redistributed open space that is finer grain than the existing.

The potential for short-medium term affordable rental accommodation to contribute to the vitality and diversity of the area and further strengthen the local economy will be recognised by a the provision of affordable housing. The housing will be low cost in construction, will not have car-parking and prospective tenants will be subject to eligibility criteria. The housing will be managed by a community housing provider or equivalent.

Extensive street planting combined with dedicated cycle lanes and redistribution of open space will create a network of green spaces more accessible and useable for adjoining residential areas and the existing public school.

Courtyards will be publicly accessible and activated by ground level shopfronts, commercial spaces and workspace/studios.

The area will recognise the potential a precinct wide approach may have in achieving a more sustainable performance in relation to water, CO2 and energy, waste, car parking and reduced car dependency. Innovative governance, management and infrastructure systems will be investigated, developed and adopted to achieve improved sustainability.

The images below give an impression of the possible future character that could emerge if the existing subdivision pattern is retained or replicated. The images also show the dual use of courtyard spaces and lanes as shared spaces.

Figure 1 Urban Courtyards in Sydney, Marrickville, Brookvale and Berlin



Heckmannhofe Berlin [http://imagine.youropi.com/heckmannh-fe-berlijn-2\(p:activity.2473\)\(c:0\).jpg](http://imagine.youropi.com/heckmannh-fe-berlijn-2(p:activity.2473)(c:0).jpg)

http://berliner-hoefe.de/system/image/slideshows/images/000/000/045/large/IMG_8248.JPG



Precinct 75 Sydenham

http://imganuncios.mitula.net/kick_start_office_5890132423881820497.jpg, Simpson



Marrickville Ginger Factory
Source: Googlemaps

Source: Michael Zanardo



Brookvale Lifestyle Working
Source: Googlemaps

Source: Simpson

5 Urban design principles and priorities

The following urban design principles would help achieve the desired future character outlined above. It should be clear from the vision that a typical 'business park' or 'office park' similar to the models of Macquarie Park, Rhodes or Norwest, or the 'light industrial' strata developments that are typical of intensification of industrial areas, are not what is desired for the area because these **typical models do not fit well with the desired types of activities**- live-music, specialised food and beverage production, creative industries and so on that are envisaged. The principles are not concerned with style or detailed design. They should be seen as a simple 'code', the DNA of the city that is likely to produce the desired result. The street network, subdivision pattern and retention of quirky 'character buildings are key.

Achieving the vision of a special precinct that has a distinct character, unlike any other in Sydney will be facilitated by a precinct-wide approach to car parking and ways of sharing and distributing benefits and costs to landowners in the area for infrastructure improvements and the retention of character buildings.

5.1 Street grid and character

Issue: Whether the existing road and lane pattern is ideal for the changes in use and activities that are likely to be attracted to the area, and if not, whether there are some principles that are almost independent of the particular uses that would provide maximum flexibility and adaptability.

The historical continuous street grid surrounding the Victoria Road precinct was originally laid out as a primarily residential area that served as a 'dormitory' suburb for the industrial areas nearby. These were very long street blocks for the period that 'fed' the major connector roads: Addison and Sydenham Roads in particular. The street pattern and large lots in the subject area is typical of industrial areas in southern Sydney in the early 20th century. There are very few intersections and few connections to roads other than Victoria Road itself.

The shift to less intrusive activities, an expected reduction in heavy truck movements and the desire to improve the amenity of Victoria Road to be more of a 'enterprise boulevard' would be supported and facilitated by the introduction of new road connections, streets and lanes to serve the rear of premises fronting Victoria Road, and to create opportunities for active frontages. The character may be closer to the intensity of Surry Hills in the longer term. The following diagrams give an indication of the difference in grain between different areas.

Figure 2 The difference in street grain in Surry Hills, Brookvale, Artarmon and the Victoria Road Precinct



Figure 3 Analysis of relative connectivity by intersection type Victoria Road and Surry Hills

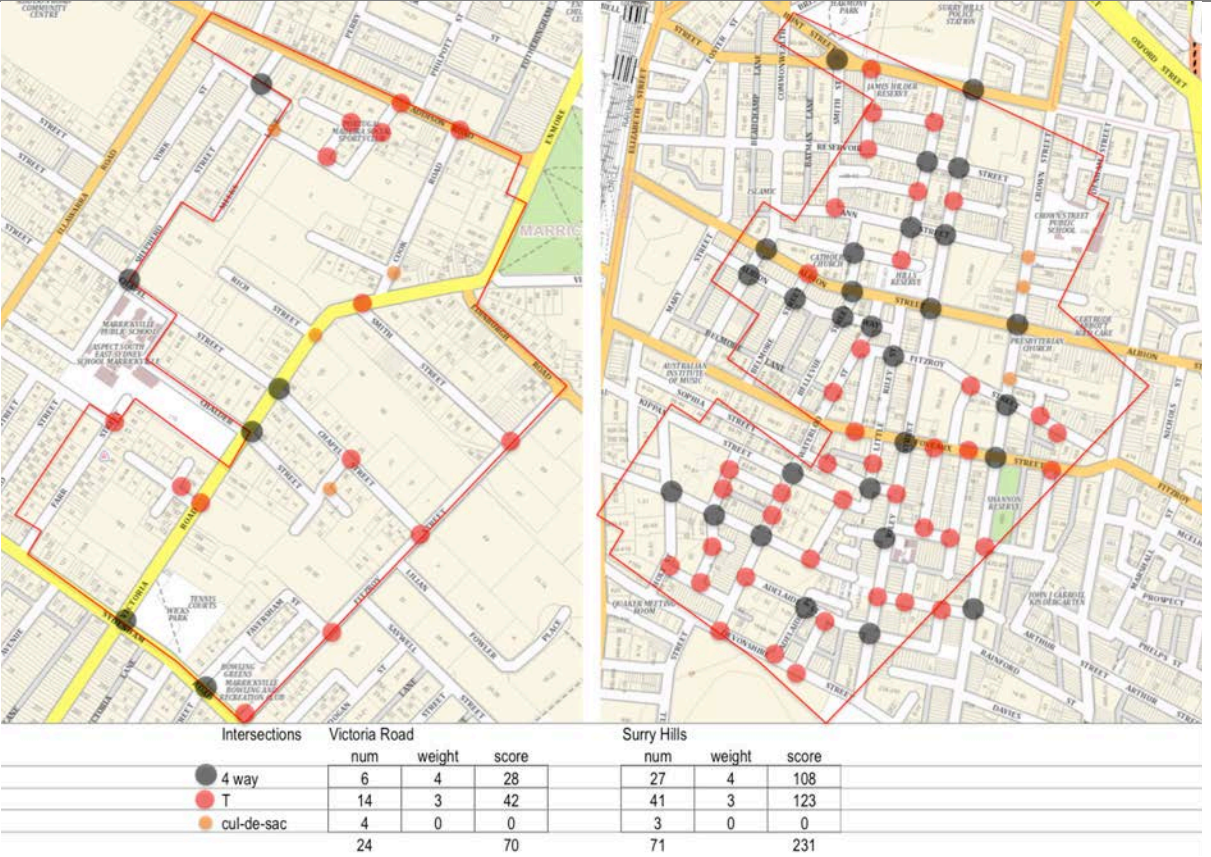


Figure 4 Analysis of current proposal and suggested street and lane network and alternative providing rear lanes and greater permeability



There should be a variety of street conditions related to their role and function and desired character, not simply the volume and type of traffic. Improving the permeability and pedestrian and cycle connections to the north west and south east right through to Sydenham station should be considered as part of the planning.

Relationship to Planning Proposal:

The proposal for additional streets and lanes that connect to the surrounding network should be strongly supported and commended.

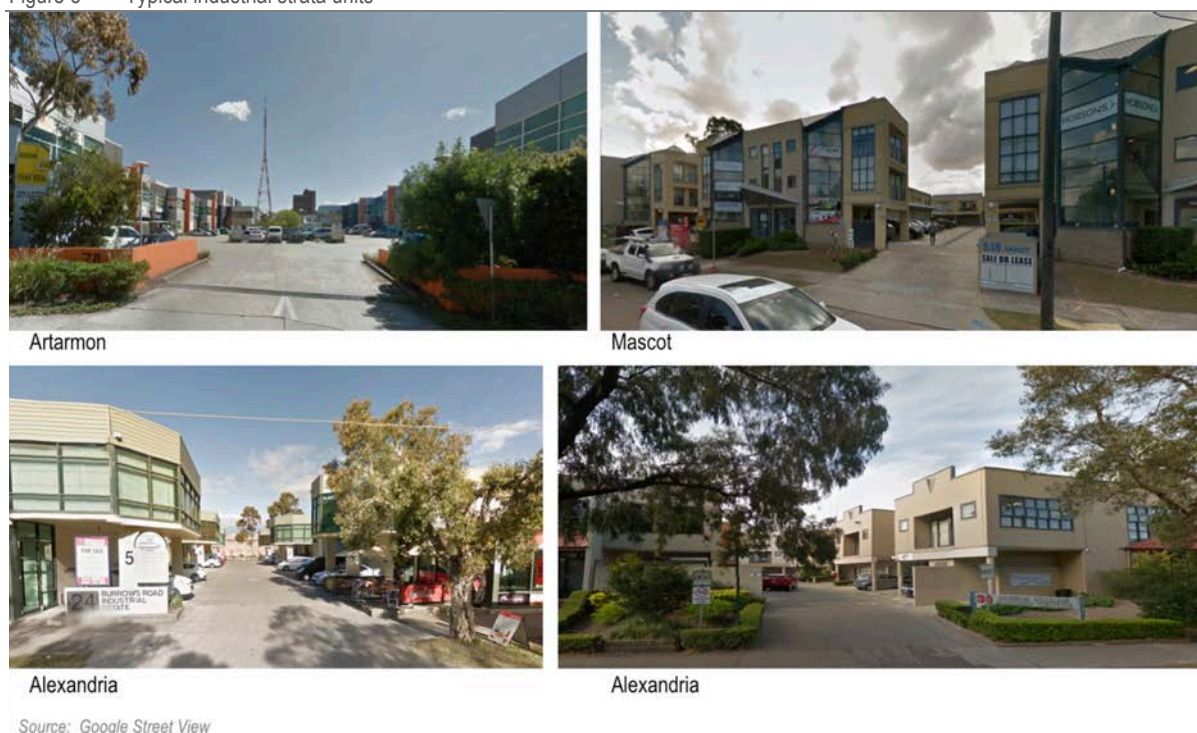
5.2 Subdivision pattern

Issue: Whether the existing subdivision pattern is ideal for the anticipated change in use, and whether the lot configurations can accommodate the future uses and intensification.

The diverse range of lot sizes is a characteristic of the area, with larger lots often having small frontages to roads with most of their area 'buried' in the middle of the street blocks behind finer grain smaller lots that take advantage of the road frontage. These large lots are typically used for the activities that are expected to relocate out of the area. For this reason new streets and lanes will be required to provide access to a finer grain subdivision pattern more appropriate to the types of activities that are anticipated.

The vision for the area should not be the typical 'strata industrial units' with a central road/loading/parking area that has emerged as the dominant form in other parts of the city where there has been a failure or disinclination to provide additional public streets.

Figure 5 Typical industrial strata units



The retention of the small lots and narrower frontages should be preserved.

There should be a significant increase in the number of lots in the area after the introduction of new streets and lanes. Site amalgamations and boundary adjustments will be necessary to facilitate the renewal and intensification, but the 'legacy' subdivision should be finer grain than exists as befits the new activities.

The finer grain subdivision will allow for a wider range of designs and allow many small to medium enterprises and developers to have an involvement in the development of the area rather than major property companies solely. This diversity is consistent with the existing character and future vision for the area; large floor plate commercial buildings are not. There is a plentiful supply of land for more corporate offices and warehousing in other parts of Sydney and the sub-region (district).

It is often suggested that small lots are an impediment to the 'efficient' layout of streets and the introduction of new infrastructure. The purported necessity for 'efficiency' is more often related to particular building typologies; large floor plate offices in commercial areas, efficient car parking layouts and separation distances for apartment buildings. None of these should or need to be a consideration in the Victoria Road precinct.

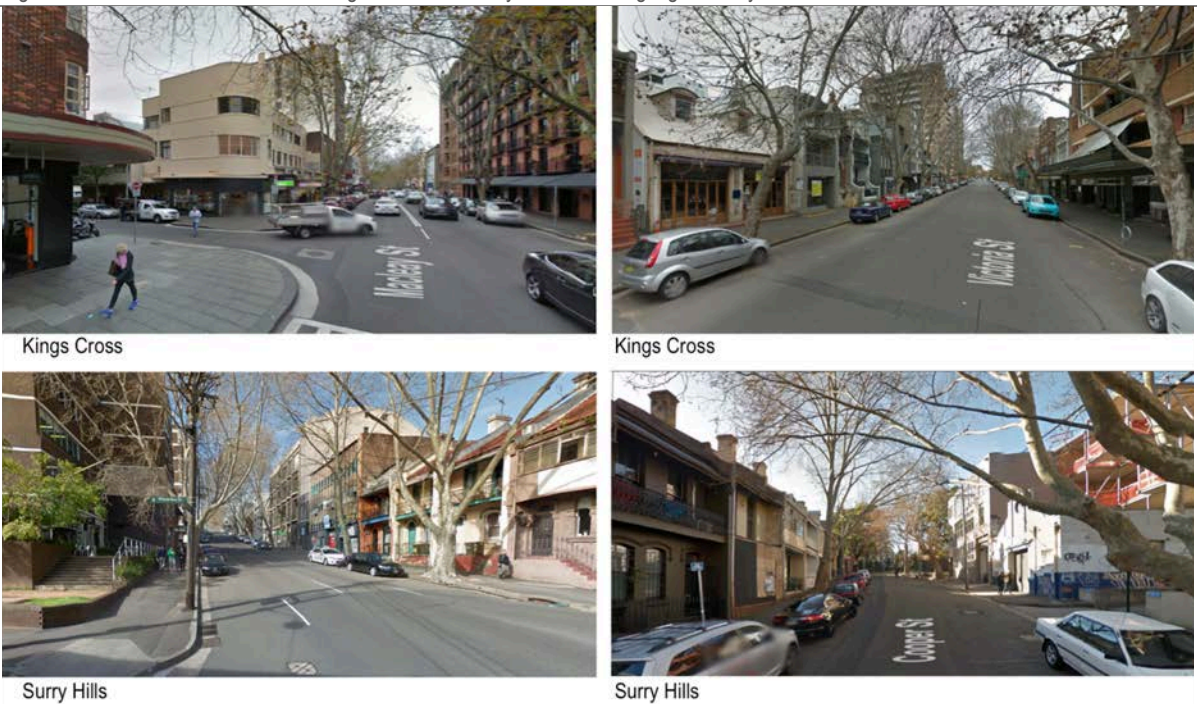
The densest urban areas in Australia outside the actual central business districts have fine grain streets and a wide variety of lot sizes and widths. Fine grain subdivision actually provides the opportunity for detailed responses to particular site conditions that can often achieve much higher densities in 5-6 storeys built boundary to boundary than towers or corporate office parks that are actually quite low density.

Figure 6 Variation in lot widths and sizes in Kings Cross/Potts Point



Source: CoS City East Urban Design Study Allen Jack + Cottier, Deena Ridenour

Figure 7 Variations in built form Kings Cross and Surry Hills achieving high density



Source: Google Street View

Relationship to Planning Proposal:

The illustrative master plan shows large footprint buildings that cross existing boundaries and infer many site amalgamations across the precinct.

5.3 Car parking

Issue: Whether conventional site by site provision of car parking is the best approach for the precinct.

There will need to be an increase in car parking for the increased intensity of activity. The vision is not a large floor-plate office park, there will not be extensive areas of residential and car parking would be more efficiently and cost effectively provided on a street block or sub precinct level, above ground in dedicated structures that may be 'sleeved' by active uses at the ground level, and designed to allow adaption to other uses over time.

This would make every site developable and would eliminate the need for excavation.

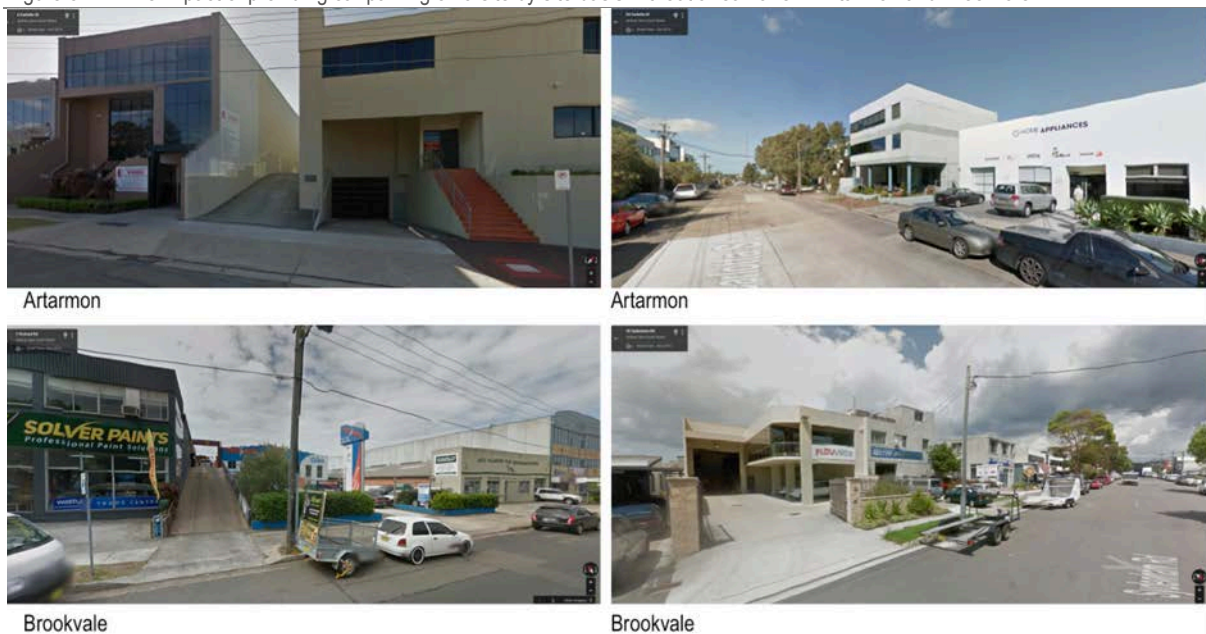
An additional benefit would be activation of the street instead of visitors and customers parking underground and moving only within the building and then leaving the area. Circulation on the street by pedestrians should be maximised.

A precinct wide approach is no different to the public car parking arrangements that apply in existing 'town' and 'village' centres with shopping strips where councils regularly provide car parking for shoppers and visitors to the area.

An additional advantage would be control over the amount and value of the car parking, by controlling the 'market' for parking. This would enable council to increase or decrease car parking in relation to policy-providing ample car parking to stimulate investment in early years and progressively reducing it in response to improved public transport or land value.

How car parking is provided will have a significant influence on the character and 'vibe' of the area. The vision is not the urban condition that has emerged in Brookvale or Artarmon where there is extensive parking at the front of premises and where there are wide ramps and many kerb cuts and vehicle movements that cut across pedestrian footpaths. This is due primarily to the original residential subdivision pattern that did not include rear lanes.

Figure 8 The impact of providing car parking on a site by site basis without a rear lane in Artarmon and Brookvale.



Source: Google Street View

Figure 9 The impact of car parking and entries in higher density areas when no rear lane has been provided.



Relationship to Planning Proposal:

Parking is assumed to be provided on a site by site basis.

5.4 Character buildings

Issue: The variety of building types and 'quirky buildings' that give the precinct its character are at risk with redevelopment and increased FSR.

There are a wide range of building types in the area reflecting the particular and diverse range of activities that have occurred. These range from anomalous residences, to corrugated iron sheds to derelict ambulance stations. None of these are formally scheduled as 'heritage' in the LEP, but are very important elements that contribute to the character of the area.

Most of the sites in the precinct are not developed to their existing full potential of FSR 0.95:1. As the value of land increases it can be expected that these buildings would be demolished, and the character of the precinct would be diminished.

Consideration should be given to the establishment of a 'Tradable Development Rights Scheme' that could apply to the precinct. This would operate in a similar way to the Heritage Floor Space Scheme in the City of Sydney where heritage buildings that have no development potential may trade their development rights (floor space) to other sites.

Given that many of the sites in the area are well below the current permissible 0.95:1, the definition of which sites this should or could apply to will need detailed consideration.

It is important to consider this in relation to the current Planning Proposal because the increases in FSR and consequently, land values, is one of the key changes that needs to be used harnessed to achieve the improvements needed in the precinct, including the preservation of 'character buildings'.

Figure 10 'Character' Buildings



Smith St Sydenham

Source: Near Map



Edinburgh Road Sydenham



Brompton Street Sydenham

Source: Simpson



Brompton Street Sydenham

Relationship to Planning Proposal:

The planning proposal makes no mention of the character of the area or contribution 'quirky' and typical industrial buildings make to it. The Planning Proposal proposes increase in FSR from 0.95:1 to 1.0:1 1.2:1, 2.0:1, 2.6:1, 3.0:1 and 3.5:1.

Figure 11 Areas proposed to have a significant increase in FSR

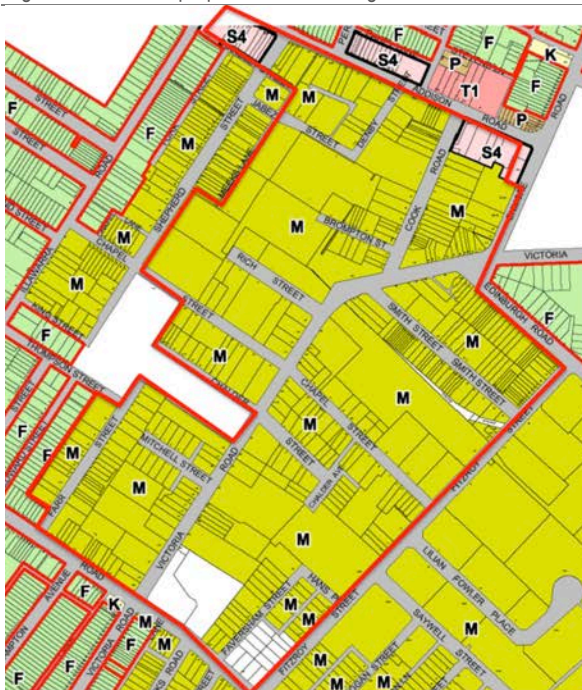


Figure 14 – Floor Space Ratio Map from MLEP 2011

M= FSR 0.95:1

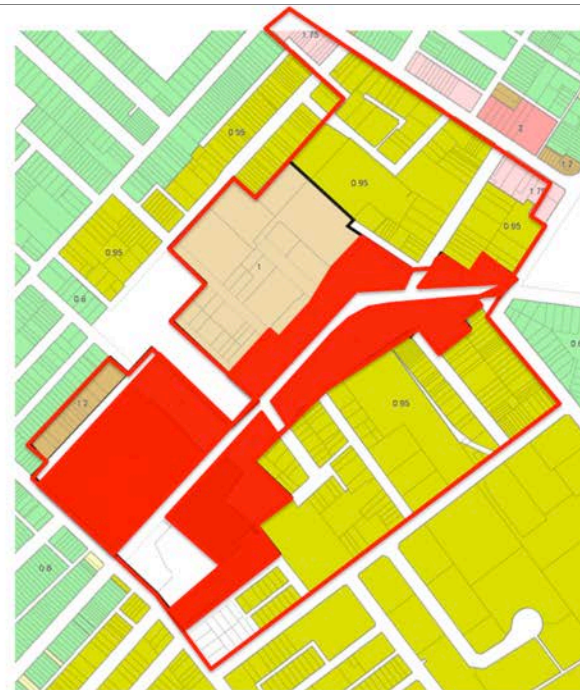


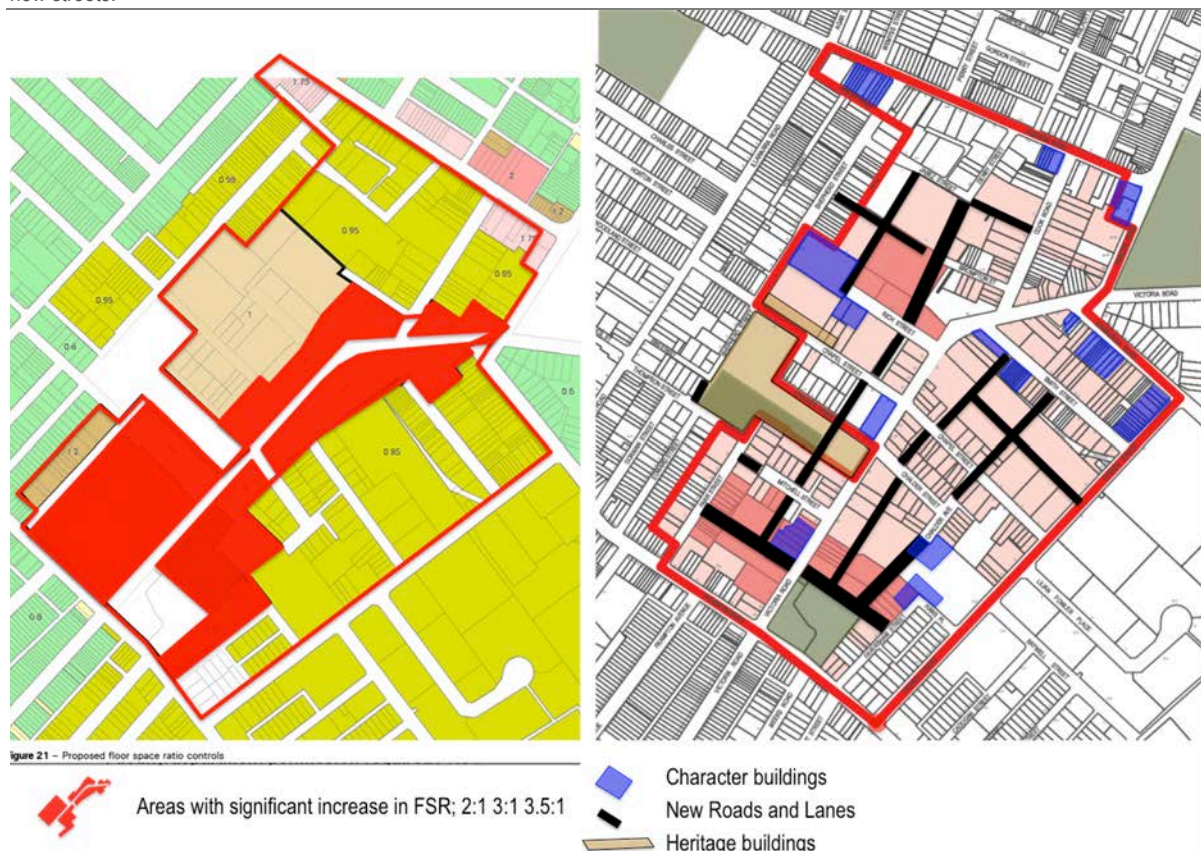
Figure 21 – Proposed floor space ratio controls



Areas with significant increase in FSR; 2:1 3:1 3.5:1

The areas proposed to have the greatest increase in FSR are in locations that are also likely to have the greatest increase in value. Therefore it is important to assess the quantum of floor space – (the demand) that these sites may need to purchase from “character sites”. The diagram below shows the areas that are proposed to have significant increases in FSR compared to the areas of the ‘character buildings’ and additional streets. It is also clear from the diagram that the even with a generous provision of new lanes and roads, the areas proposed to have an increase in FSR are significantly larger than the area suggested for new streets and lane, and the area of land occupied by ‘character buildings’. Therefore, it is conceivable that the uplift may be partially captured to fund the new streets.

Figure 12 Comparison of the areas that will have an increased floor space compared to the area of illustrative ‘character buildings’ and new streets.



Whether the capture is in the form of transferable development rights or more localised ‘land re-adjustment’ agreements is an open question. Such ‘land readjustment’ processes are regularly used in Japan, Turkey and Germany. Australia lags in innovative approaches to urban renewal, relying instead on large developers assembling sites, which is financially inefficient, and tends to obliterate the character of the renewal area.

5.5 Open space

Issue: Whether there is an opportunity to rationalise the amount and distribution of open space, including the open space associated with the school.

The location, type and quality of open space is a result of historical happenstance. The accessibility and useability is poor and the amenity of Wicks Park is compromised by traffic on two sides. The renewal of the area provides an opportunity to improve the location and configuration open space and the school grounds.

Given the overall intensification of the inner city and the difficulty and expense of increasing the amount of dedicated public open space, a multilayered approach needs to be adopted that considers:

- the accessibility of existing open space
- the quality of existing open space
- public access to ‘private courtyards’ or re-conceptualisation of courtyards as public spaces
- the role of streets as recreational spaces for walking and cycling not simply providing access

- the location and provision of indoor recreation spaces, gyms, futsal, indoor sports etc.
- the use of the rooftops of publicly owned buildings; car parks etc.

There is the potential to retain mature trees on Victoria Road and Sydenham Road and in Wicks Park but to also relocate and increase the amount of open space accessible to residential areas to the west.

Relationship to Planning Proposal:

The planning proposal makes no mention of the potential to change the amount or location of public open space or the school grounds. This is one of the main reasons a planning proposal should follow rather than precede or pre-empt wider precinct or strategic planning.

5.6 Building heights and interface conditions

Issue: Whether there are general principles about the compatibility of uses and interface conditions that can be taken into account at this early stage, irrespective of the final uses.

The height of buildings needs to be considered together with the spatial definition of streets and public spaces. The creation of a relatively continuous street wall, even if only 2 or 3 storeys can serve to 'screen' or 'mediate' the visual impact or prominence of taller buildings and towers.

Conversely, where there are existing dwellings adjoining the renewal area, or across the road the height should consider both existing and longer term potential heights.

Relationship to Planning Proposal:

The planning proposal shows heights of up to 48 metres. This may be acceptable along Victoria Road, but would be overwhelming if built as close to Sydenham Road as currently shown.

If the open space is reconfigured there should be some height allowed on the area currently occupied by Wicks Park, while still preserving the existing mature trees on Sydenham and Victoria Roads.

Consideration could be given to buildings up to 21 metres along Sydenham Road opposite existing 1 and 2 storey dwellings on the south side of the road. These properties which have rear lane access, may be rezoned for higher density and redeveloped over time with increased height. For this reason, and because of the amount of traffic on Sydenham Road, a four storey form with the upper two levels set back, may be appropriate on the north side in the subject area.

6 Comment on the proposal with focus on Sections 4 & 5 (Design Principles & Master plan)

6.1 The scale and overall heights (in the immediate and broader landscape setting) of predominantly residential development proposed for the southern part of the precinct; and

6.1.1 Lots on the western side of Farr Street should not be consolidated. The development potential will be just as great if individual blocks are developed as 3 /4storey /live work premises, built boundary to boundary without car parking. Car parking could be provided nearby.

6.1.2 Leaving aside the issue of whether residential should be permitted, there seems little reason to restrict the frontage along Sydenham Road to 3 storeys. The area on the south side of the road is commercial as far to the west as Frampton Lane. The residential lots to the west of Frampton Lane have a rear land and could be suitable for higher density in the future. Note the R4 development in Garners Road.

6.1.3 The built form on the east side of Farr Street could also be higher (up to 6+2) given the WNW orientation.

6.1.4 The rationale for the built form on Block X is not clear.

6.2 The street wall proposed along Victoria Road.

6.2.1 If the objective is to create a mixed use high density corridor along Victoria Road the proposed heights are appropriate. The creation of a rear lane as shown in Figure 12 is essential if Victoria Road is to develop the character of an urban boulevard. Precinct parking rather than site by site parking would serve to activate the streets. Loading, and deliveries would still be on site for bulky goods.

6.3 The layout and arrangement of buildings relative to open space, paths, landscape and existing and proposed street networks

6.3.1 The renewal of the area presents the opportunity to rearrange the open space including that associated with the school. Wicks Park fronts two busy roads and is bounded by light industrial at present. The 14 storey form shown would overshadow the park in the morning.

More importantly, all of the open space could be reconfigured to be more accessible and useable. If there is residential development in the area, preference should be given to a system of interconnected public open spaces rather than private courtyards.

In the same vein, the school site could have securable fenced 'core' with the other playground areas made available to the public as dual use. The current configuration of the school green is not ideal fronting Victoria Road. It may be preferable to have a land swap that consolidates the grounds to the west and south along Farr street, retaining a pocket park where there is the existing grove of mature trees on Victoria Road.

6.3.2 An alternative strategy may be to avoid the creation of any private courtyards or courtyards are that are the exclusive domain of adjoining buildings. A set of interconnected publicly accessible spaces that provide both calmed vehicular access and an attractive, shaded pedestrian places should be the aim. This type of environment is common in Paris, Berlin and Copenhagen, but also in groups of industrial buildings – e.g. precinct 75. Refer to images in Figure 1.

6.4 Any other general strategic urban design advice

6.4.1 The key objective should be to create a precinct that can intensify and develop over time and that encourages and allows diversity. If this is the key objective, then it is important to recognise the need for an ongoing 'stewardship' role. This is similar to the role local government plays in relation to shopping centres where there is continual re-investment in the public domain and in the provision of essential infrastructure including car parking.

7 Comment on Planning Proposal Design Principles

The following principles are set out in the Planning proposal. Not all are principles.

7.1 REGIONAL CONTEXT

The precincts close proximity to regional infrastructure such as railway lines and arterial roads makes it very suited to increased development densities. This is supported by existing public transport options that could be enhanced with increased patronage.

Comment: Agree in general: but desirability and necessity for heavy traffic in this area should be questioned. Impact of SydneyMetro and WestConnex could be significant.

Many of the surrounding areas have developed unique characters making them desirable places to live and work with a strong yet diverse community identity. The Master Plan needs to encourage a unique and authentic character to develop out of the precincts existing positive attributes that distinguishes it from both the established and renewing suburbs.

Comment: Agree: requires new thinking about how these mixed use precincts are 'managed'. Innovative mechanisms for value sharing and capture, and ongoing re-investment in the area need to be investigated.

7.2 LOCAL CONTEXT

The Master plan should allow existing viable businesses to remain as part of the employment diversity in the area, especially adjacent to industrial zones in adjacent precincts.

Comment: Agree: requires new thinking about how 'population serving industry' can be 'protected'. One mechanism worth exploring would be to 'lock-in' these activities but have a tradable development rights scheme to ensure equitable distribution of benefits flowing from uplift in the area.

There is an opportunity to make green connections between surrounding open space areas through the new network of roads and paths.

Comment: Agree: but should be in the context of a review of the types and amount of open space and avoidance of private open space to ensure maximum future flexibility and adaptability.

7.3 CURRENT ZONING

The uniform industrial zoning is redundant and rezoning should respond to both existing and desired future character.

New zoning should provide appropriate interfaces between different uses, both new and existing, and allow for a critical mass that promotes their viability and creates 'hubs' of like businesses

Comment: Agree: but zoning is a blunt instrument and cannot of itself produce a desired future character. Built form, street and subdivision patterns and well a consideration of how car parking are handled, and retention of 'character' buildings are much more important determinants of future character. It should also be recognised that the combined effect of the standard LEP template, ADG, and finance and legal arrangements and standardised

engineering approaches favour standardised building typologies that work against the creation of places with a distinct character and authenticity.

7.4 CURRENT MAXIMUM BUILDING HEIGHT

Heights around the edge of the precinct should respond to the adjacent context to provide a transition from the central area of the precinct.

Comment: Agree: The heights shown on the Proposed building heights map are appropriate. 23m on Victoria Road may be unnecessarily restrictive as higher floor to floor dimensions are proposed and plant protrudes above the bulk of the building.

There is an opportunity for higher buildings in the central area where increased density is desirable to create the intensity of different uses that supports their viability.

Comment: Disagree: it is not clear which uses would be supported by local residents, particularly if the dwelling are market housing. The area will be enlivened primarily by people visiting the area- it will be operating at a sub-regional level, with some activities (live music, craft breweries etc. operating at the metropolitan level)

Victoria Road as a commercial corridor, link between existing retail precincts, and public transport route is also an opportunity for building heights that define it as a significant urban road.

Comment: Agree: the vibrancy, amenity and character of the street will rely on rear lane access.

7.5 CURRENT FSR

The Floor Space Ratios will be a result of the desired building envelopes and so a range is anticipated specific to its adjacent context.

Comment: Disagree, there is no intrinsic relationship between FSR and built form.

An increase in development density provides the opportunity for an increase and diversity of employment opportunities, increased housing supply and subsequent improvements in provision of new streets, paths and public domain.

Comment: While these observations are true, overall I disagree, the existing FSR of 0.95:1 has not been used on many sites. There should be no increase in FSR without mechanisms for value capture as part of the planning proposal. This should not be on an ad-hoc basis in the form of VPAs but coordinated across the precinct. It has yet to be shown why there is any need for additional market housing in this area, particularly in areas greater than ANEF25. Precedents are not a basis for increasing housing in noise affected locations.

The value uplift that is likely to come from overall market trends: the relocation of manufacturing and demand for city centre support functions, combined with the Sydney Metro are likely to be major drivers of increased values and intensification of the area beyond 0.95:1.

The issue is one of timing and funding, and whether the amenity of the area (or lack of amenity) is an impediment to intensification.

The need for additional streets is a slightly different issue. There is no question that these will be needed but on the other hand, the creation of streets also adds value to large industrial sites and allows subdivision into smaller, higher value lots. It should be noted that the proposal identifies a number of additional roads and lanes that connect into the existing network. This is immeasurably preferable to typical cul-de-sac light industrial unit developments.

Although the master plan is illustrative and has no status, it is important that the street and lane dimensions are adequate: 20m for streets and I would suggest 12 for 'small streets' or lanes to allow for tree planting.

There is also a relationship between FSR and the creation of streets and lanes that needs to be taken into account. The current proposal does not take into account the area required for these new streets, or for that matter new open space or how that will affect the FSR.

Generally in higher density areas road occupy 30-35% of the total urban area. It will be less on the subject sites but it is important to recognise that up to 10% of the site are could be roads. Consequently the FSR on the remaining site would be increased by 11%. Given that the FSR on the site that is being proposed is 3.0:1 this would increase to 3.3:1. A general rule of thumb would assume an FSR or about 0.3:1 per storey. This means the AVERAGE height of buildings is likely to be 10-11 storeys.

7.6 HERITAGE

Heritage items make the precinct diverse and distinctive.

Comment: Strongly Agree: but could be extended to contributory 'character buildings'.

Sims Metal Factory could be converted into a 'rain, hail & shine' venue (village markets, exhibitions, community events, functions) and become an important gathering place for the existing and new community.

Comment: Strongly Agree: but this needs the establishment of a tradable development rights system (equivalent to the City of Sydney Heritage Floor space system) to ensure an equitable distribution of benefit, and get 'buy-in'

7.7 PUBLIC PARKS/ OPEN SPACES

Parks, pocket parks, significant trees and street planting need to be incorporated into any future development. Establish an extensive green network that encourages access to the Victoria Road precinct and connects the significant green spaces within and around the precinct.

Comment: Strongly Agree: but rationalisation of existing open space and school grounds should be part of the proposal.

7.8 PUBLIC TRANSPORT

The precinct is close to public transport options, particularly at the southern end, which benefits increased densities.

Decrease current travel distances to public transport options with a more permeable block structure and pedestrian path network

Comment: Strongly Agree: but there is no mention of reduced car parking or ownership that can significantly reduce construction costs, running costs and hence both the cost of the dwelling and ongoing household expenditure on travel.

7.9 BIKE PATH NETWORK

Cycling is convenient and sustainable. Enhance the current bike network in the area by incorporating additional bicycle friendly streets throughout the precinct which connect the existing routes.

Comment: Strongly Agree: requires a wider precinct and locality plan

7.10 ANEF CONTOURS

Any residential development needs to be constructed to meet the internal noise level recommendations contained in AS2021.

Comment: Strongly Disagree: the proposal does not and cannot meet the objectives of Ministerial direction 3.5 because there is no provision for land being rezoned for residential above the ANEF 25 contour: that is, AS2021 is not applicable: as the whole site is subjected to greater than ANEF25

Ministerial Section 117 direction 3.5 has 3 objectives.

The first two are concerned with the safety or aerodrome operation and that development should not impede the operation of the aerodrome.

The third is to ensure that the residential amenity in areas between the ANEF 20 and 25 contours may be adequate by the incorporation of appropriate mitigation measures.

3.5 5 (a) states that a planning proposal must not re-zone land for residential purposes, nor increase residential densities where the ANEF exceeds 25.

The proposal is for rezoning to residential and will increase residential densities significantly.
The direction does not anticipate or specify the measures required for residential purposes within the ANEF 25 contour and above because these are not anticipated.

This assumption is made explicit in 3.5_ 6 (a) where it states that a planning proposal that rezones land for residential purposed in areas between ANEF20 and 25 – there is no mention of measures for areas exposed to greater than ANEF25.

Objectives (authors emphasis)

(1) The objectives of this direction are:

1. (a) to ensure the effective and safe operation of aerodromes, and
2. (b) to ensure that their operation is not compromised by development that constitutes an obstruction, hazard or potential hazard to aircraft flying in the vicinity, and
3. (c) to ensure development for residential purposes or human occupation, if situated on land within the Australian Noise Exposure Forecast (ANEF) contours of between 20 and 25, incorporates appropriate mitigation measures so that the development is not adversely affected by aircraft noise.

There is no mention of mitigating measures for residential in areas greater than 25ANEF.

4. (6) A planning proposal **that rezones** land:
 1. (a) for residential purposes or to increase residential densities in areas where the ANEF **is between 20 and 25**, or
 2. (b) for hotels, motels, **offices** or public buildings where the ANEF is between **25 and 30**, or
 3. (c) **for commercial or industrial** purposes where the ANEF is **above 30**,

must include a provision to ensure that development meets AS 2021 regarding interior noise levels.

(7) **A planning proposal may be inconsistent** with the terms of this direction **only if** the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are:

- (a) **justified by a strategy which:**
 - (i) gives consideration to the objectives of this direction, and
 - (ii) identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and
 - (iii) is approved by the Director-General of the Department of Planning, or
- (b) **justified by a study prepared in support of the planning proposal which gives consideration to the objective of this direction, or**

Comment: The proposal does not give consideration to the objectives, because the objective is that no residential should occur in areas above ANEF25)

- (c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or

Comment: As outlined above, although there is no adopted Sub Regional strategy, there is a consensus in other planning studies and strategies that the area should focus on the retention, diversification and intensification of light industrial and other commercial activities **irrespective** of any noise affectation

(a) of minor significance.”

Comment: Locating 1,300 dwellings in areas above ANEF is not of minor significance; (would a proposal to locate 1,300 dwelling in areas greater than ANEF25 in areas near the Second Sydney airport be supported?)

TABLE 2.1
BUILDING SITE ACCEPTABILITY BASED ON ANEF ZONES
(To be used in conjunction with Table 3.3)

Building type	ANEF zone of site		
	Acceptable	Conditionally acceptable	Unacceptable
House, home unit, flat, caravan park	Less than 20 ANEF (Note 1)	20 to 25 ANEF (Note 2)	Greater than 25 ANEF
Hotel, motel, hostel	Less than 25 ANEF	25 to 30 ANEF	Greater than 30 ANEF
School, university	Less than 20 ANEF (Note 1)	20 to 25 ANEF (Note 2)	Greater than 25 ANEF
Hospital, nursing home	Less than 20 ANEF (Note 1)	20 to 25 ANEF	Greater than 25 ANEF
Public building	Less than 20 ANEF (Note 1)	20 to 30 ANEF	Greater than 30 ANEF
Commercial building	Less than 25 ANEF	25 to 35 ANEF	Greater than 35 ANEF
Light industrial	Less than 30 ANEF	30 to 40 ANEF	Greater than 40 ANEF
Other industrial	Acceptable in all ANEF zones		

7.11 FLOOD PRONE LAND

Stormwater management should be considered precinct wide to benefit from an integrated and holistic approach. Stormwater runoff and peak discharges can be reduced with the reduction in hardstand areas and developments that incorporate stormwater retention for re-use, and detention for controlled discharge.

Comment: Strongly Agree.

7.12 ACID SULPHATE SOILS

Acid sulphate soils are regularly encountered in the Sydney metropolitan area and can be addressed with conventional construction practice. As such, acid sulphate soils are not a hindrance to development

Comment: Agree.

7.13 CADASTRAL PATTERN

The pattern of development within the surrounding area is generally fine grained and predominately residential in both scale and character. The proposed uses for the precinct should therefore respond to its surrounding context more appropriately so as to better integrate uses and avoid conflicts currently experienced.

Comment: Unclear; site amalgamations and erasure of fine grain subdivision pattern is indicated on the master plan drawings. Retention of the fine grain subdivision pattern and putting in place measures to allow this to occur should be a core principle.

7.14 STREET PATTERN

The large street block pattern reflects the site's current (larger lot) industrial usage and provides good flexibility for redevelopment. The precinct would benefit from the addition of a network of finer grain pedestrian connections and enhancement of local connectivity with the creation of small-scale linkages (e.g. share ways). Victoria Road is a key higher order road and provides an opportunity for more intense forms of development that reinforce its role as a major collector road through the precinct'.

Comment: Strongly Agree: the need for rear lane access for loading and servicing needs to be recognised.

7.15 CURRENT USE PATTERN

The Master Plan and future development controls should provide a framework that will enable more coordinated and orderly development.

Comment: Questionable: the disorderly, fragmented and 'organic' nature of the area is part of its attraction. Greening would work wonders: e.g. Danks Street.

7.16 ART STUDIOS, GALLERIES, CREATIVE WORKSHOPS

The creative businesses in and around the precinct contribute to the unique character of the area. Encourage existing creative businesses to remain and allow new creative businesses in appropriate locations through suitable zoning and potential diversity of building typologies.

Comment: Strongly Agree Refer to figure 1 for images of contemporary creative premises and 'urban courtyards where vehicular movement and pedestrian movement is managed through shared access. This is the general condition in strata industrial units as well.

7.17 OWNERSHIP STATUS & LOCAL SUPPORT

Facilitate the delivery of orderly and coordinated development by being aware of lot boundaries and enabling re-development to occur progressively with minimum cooperation between adjacent land owners required.

Comment: Agree.

The large lots and consolidated land holdings provide opportunities to address development constraints such as increasing vehicular and pedestrian permeability, creating street address for new development, reducing adjacent land use conflicts, reducing amenity impacts of increased density and taller building envelopes, and improved stormwater management.

Comment: Agree. The major landowner has the ability to introduce and number of critical linkages without involving other landowners. This should not be interpreted as an incentive for lot amalgamations.

8 Appendix: Marrickville Community Strategic Plan

8.1 Local objectives

The local objectives are set out in the Marrickville Community Strategic Plan. If there is to be a significant change to zoning, it is reasonable to expect a public benefit to result, and to use the objectives of the MCSP as the starting point for defining the public benefits.

In short, every rezoning should contribute to the outcomes outlined in the Strategic Plan.

The priorities set out in the Plan:

- Addressing the complex problem of housing affordability in our inner city area
- Completing our major projects and providing our community with essential facilities such as recreational facilities
- Renewing our ageing infrastructure in a difficult financial environment
- Nurturing our urban environment and dealing with the challenges of climate change
- Preparing for our ageing population as well as our 'baby boom' shown in the most recent 2011 Census
- Ensuring adequate health, transport and educational services provided by the Commonwealth and State Governments
- Increasing availability of quality childcare
- Supporting members of our community who need a hand.

8.2 Specific objectives in the community plan that the proposal should address.

Relevant outcomes in the Marrickville Community Strategic Plan

Key Result Area 1: A diverse community that is socially just, educated, safe and healthy

1.1 The community is active and healthy

1.1.1 Provide the community with access to diverse and affordable sporting and recreation opportunities

1.1.2 Provide sport and recreation facilities, programs and services that meet the present and future needs of the community

1.2 The community has improved access to a range of local services for all ages and abilities

1.2.1 Provide children's education and care services that are high quality, socially just and accessible

1.2.2 Deliver and improve a wide range of essential community services that produce better outcomes for people of all ages and abilities

1.3 The community has Increased opportunities for participation and engagement

1.3.4 There are safe places for people to meet and interact

1.4 The community feels safe, connected and has accessible infrastructure

1.4.1 Plan and advocate for improved accessibility including accessible transport options and well maintained and accessible pathways

1.5 Marrickville provides affordable housing options to meet the needs of the community

1.5.1 Advocate for and build partnerships to increase affordable, liveable housing

1.5.2 Support people living in residential care and boarding houses and ensure boarding houses provide clean and healthy living environments

1.5.3 Research and develop strategies to increase affordable housing supply

1.5.4 Pursue planning controls that support existing and new supplies of affordable housing

Key Result Area 2: A creative and cultural Marrickville

2.2 Marrickville is a leading independent arts centre that supports the creative industries

2.2.1 Strengthen Marrickville's role as a leading centre for the independent arts within greater Sydney

2.2.2 Support growth and employment in the creative industries, including media and design

Key Result Area 3: A vibrant economy and well planned, sustainable urban environment and infrastructure

3.1 The community is responding to climate change and is actively reducing greenhouse gas emissions

- 3.1.1 Support the uptake of energy efficiency and low carbon, renewable energy in homes, businesses, streets and public spaces and Council facilities and operations
- 3.1.2 Encourage new developments to adopt new low carbon, renewable energy technologies and be more energy efficient
- 3.1.3 Enhance Council's and the community's ability to adapt to a changing climate

3.2 The community is working towards zero waste

- 3.2.1 Support the community to reduce food waste and increase the recovery of organic food and garden waste
- 3.2.2 Provide effective and efficient domestic waste and recycling services to the community
- 3.2.3 Increase the recovery of problem waste (high volume or toxicity)
- 3.2.7 Build the capacity of the community to move toward zero waste

3.3 The community walks, rides bikes and uses public transport

- 3.3.1 Plan and provide accessible and well connected footpaths, cycle ways and associated facilities
- 3.3.2 Promote accessibility of railway stations and bus stops
- 3.3.3 Support and promote cycling, walking and use of public transport and other alternative transport modes to reduce car use

3.4 Marrickville's roads are safer and less congested

- 3.4.1 Ensure local and regional roads are safe and well constructed and maintained
- 3.4.2 Reduce the impact of traffic and improve pedestrian and cyclist safety, particularly around schools and urban centres
- 3.4.4 Ensure car parking is well managed
- 3.4.5 Develop options to reduce regional truck and car movements through the local area

3.5 Marrickville's streets, lanes and public spaces are sustainable, welcoming, accessible and clean

- 3.5.1 Ensure Council's streets, lanes and public spaces are clean, well maintained and planned in partnership with the community
- 3.5.2 Increase the urban tree canopy through sustainable new and replacement tree plantings & maintain street trees throughout the local area
- 3.5.3 Work with the community to improve the sustainability of streetscapes and reduce the urban heat island effect from hard surfaces

3.6 Marrickville's parks, grounds and open spaces provide diverse opportunities for recreation and enjoyment and are designed with community input

- 3.6.1 Ensure Council's parks are well maintained, accessible and visually appealing
- 3.6.2 Ensure Council's playgrounds are safe, accessible and offer a range of opportunities for creative play and exploration
- 3.6.3 Ensure Council's sporting facilities are sustainable, accessible and offer a diverse range of recreational opportunities

3.7 Marrickville is a water sensitive community that: supplies water from within its catchment; provides green infrastructure to support ecosystem services; and collaborates to make plans, designs and decisions that are water sensitive

- 3.7.1 Reduce the use of potable mains water in homes, businesses, Council facilities and public spaces
- 3.7.2 Manage the stormwater system and its impact on the urban environment
- 3.7.4 Implement sustainable urban water management

3.9 Marrickville's built environment demonstrates good urban design and the conservation of heritage, as well as social and environmental sustainability

- 3.9.1 Provide effective planning controls to ensure that the built environment reflects community expectations and changing needs, conserves heritage and is socially and environmentally sustainable

- 3.11 Marrickville's Economy supports local employment and provides business opportunities
- 3.11.4 Provide support to home-based businesses
- 3.12 Marrickville's Industrial areas remain an important and viable part of the local economy
- 3.12.1 Support existing industries so they remain an integral part of the local economy
- 3.12.2 Encourage the establishment of new enterprises in underutilised industrial areas