



29 July 2022

Amanda Harvey
Executive Director, Metro East and South
Planning and Land Use Strategy
NSW Department of Planning and Environment
Parramatta NSW 2150

Attention: Laura Locke, Alexander Galea, Amy van den Nieuwenhof

Dear Amanda,

RE: Public Exhibition of Planning Proposal for 122-130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale

Inner West Council is writing in response to the NSW Department of Planning and Environment's (DPE's) public exhibition of the Planning Proposal for 122-130 Pyrmont Bridge Road and 206 Parramatta Road, Annandale.

Council provides the following comments in review of the Planning Proposal package dated 31 May 2022. The Planning Proposal seeks to amend the *Leichhardt Local Environmental Plan (LLEP) 2013* to:

- rezone the site from IN2 Light Industrial to B5 Business Development;
- apply a maximum height control of 35m;
- amend the floor space ratio control from 1:1 to 4:1;
- allow retail premises on the ground floor as an additional permitted use;
- deliver 75% of the floorspace as uses associated with health, education, research, technology and creative uses;
- prohibit tourist and visitor accommodation;
- provide active frontages to Mathieson Street, Parramatta Road and Pyrmont Bridge Road;
- not significantly increase the amount of traffic on the adjoining street network; and
- include end of journey facilities to support walking and cycling.

Through the above-mentioned amendments to the LLEP 2013, the Planning Proposal would facilitate a new eight storey development on the site associated with health, education, research, technology and creative uses.

Background

Council received the original Planning Proposal request for this site on 30 June 2021. Upon reviewing the proposal, Council officers identified potential strategic merit for redevelopment, but in doing so raised concerns with regards to land use, design, traffic, access, and public domain outcomes as well as the need to consider precinct-wide approach to planning. A revised Planning Proposal prepared by Council officers was reported to the Inner West Local Planning Panel (IWLPP) in September 2021. The IWLPP advised Council that the Planning Proposal should proceed to Gateway, in the form as recommended by Council officers, that ensured improved outcomes relating to land-use, urban design and public domain.

In October 2021, a rezoning review was lodged with the DPE where the proposal was supported by the Sydney Eastern City Planning Panel (SECPP) subject to changes to align it with Council's Planning Proposal dated September 2021.

On 22 December 2021, Inner West Council requested an extension to accepting the Planning Proposal Authority (PPA) role following the rezoning review. DPE subsequently requested the SECPP appoint itself the PPA as the 42-day timeframe had lapsed for Council to accept the role. On 12 May 2022, the DPE issued a Gateway Determination to proceed with public exhibition of the Planning Proposal subject to changes.

Council's role in the assessment of the Planning Proposal, including revised plans and reports has been significantly reduced as a result of the before-mentioned events and it is with great interest that Council seeks resolution of concerns relating to land-use, infrastructure, urban design, traffic and access, and public domain.

Key Matters for DPE's Consideration

The following points are raised in response to the Planning Proposal and public exhibition documents:

1. Land use matters:

1.1 Council-led Camperdown Structure Plan and future precinct-wide LEP Amendment

The site is located on the western periphery of the Tech Central precinct, within the Camperdown node and leverages off the technology driven bio-medical aspirations for the wider Tech Central precinct. The following maps identify the Tech Central precinct and the study area being investigated by Council as part of the Camperdown Structure Plan process.



Map 1. Tech Central Precinct



Map 2. Camperdown Structure Plan Study Area

Council is currently undertaking precinct-planning work for Camperdown to implement the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) and Tech Central's aspirations of a globally competitive health and education precinct. The scope of works includes investigation of new land-uses, built form, connections and public domain improvements to realise the precinct's potential as a health and education precinct.

Council in conjunction with the NSW Health, Sydney Local Health District, Greater Cities Commission (GCC) and City of Sydney has engaged consultants to prepare the Camperdown Structure Plan. This jointly commissioned project is expected to be completed in late 2022 and will provide recommendations for LEP/DCP controls for Camperdown which Council intends to take forward as Planning Proposal for Camperdown precinct (IWLEP Phase 2C).

The preliminary findings of the Camperdown Structure Plan as well as the work being undertaken in parallel by the GCC for the wider Tech Central validates the need to safeguard this precinct for health, education and biotechnology uses. The Camperdown industrial precinct is one of the few remaining precincts close to knowledge, skills and institutions that is capable of supporting sectors associated with the university and hospital.

The location of the site, and its positioning as the first redevelopment in defining the western gateway to the Tech Central precinct requires:

- assurance that the site will be redeveloped for health and education uses aligned with State and Local Government's Strategic aspirations;
- excellence in terms of architectural and urban design qualities to ensure the proposed built form is consistent with the desired future character of the locality; and
- delivery of high quality public domain and sustainability outcomes to support the future users.

1.2 Employment Zones Reform

DPE is undertaking the Employment Zones Reforms to translate existing Business Zones to Employment Zones through a self-repealing SEPP. These reforms were exhibited from 31 May 2022 to 12 July 2022 and are expected to be finalised by December 2022. The exhibited Inner West LEP translation excluded the area of Camperdown precinct from the application of these Reforms (refer to Attachment 1). The aim of excluding the Camperdown precinct area is to allow for the Camperdown Structure Plan to be completed which will nominate appropriate land uses for the precinct to transition to health, education and technology uses.

This Planning Proposal is ahead of the wider masterplan and consequently raises concerns regarding appropriate zoning control for this site and its implications on the remainder of the precinct. In accordance with DPE's Employment Zones Reform Implementation (2022), land currently zoned B5 Business Development will translate to E3 Productivity Support. Of concern is that the exhibited Planning Proposal does not appropriately consider the implications of this translation. Therefore, it remains unclear to Council and community whether the site will be rezoned to a B Zone or an E Zone. This matter should be resolved sensitively and take into consideration the possible need to re-exhibit any new uses and / or permitted / prohibited uses on the site.

Given that an exclusion applies to Camperdown precinct from the application of Employment Zones Reform under the self-repealing SEPP, it will not be practical to transition this one site in the precinct to B5 or E3 Zone whilst the remainder of the precinct continues to be IN2 Light Industrial until the completion of precinct plan. Council is also uncertain whether it would be legally permissible to rezone this site to B5 Business Development if Employment Zone Reforms are finalised prior to the finalisation of this LEP Amendment.

Compared to both the current IN2 Light Industrial zoning, and the proposed B5 Business Development zoning, the E3 Productivity Support zone provides increased flexibility, permits a wider range of retail uses, and enables a greater range of business and accommodation related uses. These uses are not consistent with Inner West Council's or Sydney Eastern City Planning Panel's aspirations for this site or the wider precinct, particularly noting the requirements to provide limited retail and prohibiting tourist/visitor (including hotel/motel) accommodation. In addition, the proposed objectives of E3 Productivity Zone are not aligned with aspirations of Camperdown precinct.

Given the locality of the site and the need to protect lands identified within the Camperdown Structure Plan for biomedical uses associated with the Tech Central precinct, it will be more appropriate and consistent to either refrain from proceeding with the Planning Proposal until the Camperdown Structure Plan is complete or retain the existing IN2 Light Industrial zone for this site with additional permitted uses under Schedule 1 to align with the proposed B5 Business Development uses alongside the proposed additional local provision.

Recommendation 1:

Council seeks further collaboration with DPE to establish the most appropriate Employment Zone for this site. Attached is Council's recent submission to DPE regarding Employment Zone Reforms in the Camperdown precinct. The submission provides the rationale for retaining the IN2 Light Industrial zoning across the Camperdown precinct to allow for the completion of the Camperdown Structure Plan and to safeguard the growth of a globally significant biotechnology precinct. Given the key location of the site and the need to protect employment lands identified within the Camperdown

Structure Plan for biomedical uses associated with the Tech Central precinct, it may be considered more appropriate and consistent to either:

- a) defer the consideration of this Planning Proposal until Camperdown Structure Plan is complete, as this will inform the most appropriate and consistent land use zoning for the site and the wider Camperdown precinct; or
- b) retain the existing IN2 Light Industrial zone and allow additional permissible uses under Schedule 1 to align with the proposed B5 Business Development zone. This would be complemented by the proposed additional local provision with:
 - limited retail premises on the ground floor as an additional permitted use;
 - 75% of the floorspace as uses associated with health, education, research, technology and creative uses;
 - prohibit student accommodation, and tourist and visitor accommodation including hotel and motel accommodation.

Recommendation 2:

Subject to the resolution of the above land use zoning issue, Council strongly supports the proposed additional local provision as in the exhibited Planning Proposal.

It is also noted that given the flexibility allowed in the proposed additional local provision relating to providing not just health but also education, research, technology and creative uses, it is misleading to publicly exhibit the Planning Proposal as Camperdown Health Facility. There is no mechanism in the proposed LEP amendment to ensure that the proposed development will result in a standalone health facility as claimed in the exhibition package.

2. Draft Development Control Plan and Planning Agreement matters

As noted in the SECPP decision, it is critical that the Planning Proposal be accompanied with a site-specific DCP and Planning Agreement to deliver the built form and public domain outcomes envisaged in the Planning Proposal.

Council's Property and Legal team are in the initial stages of negotiating a Planning Agreement with the proponent in relation to the proposed development and dedication of parts of site to Council. These matters relate to:

- Provision of setbacks along Cahill Street, Mathieson Street and Pyrmont Bridge Road;
- Provision of new Shared zone along Mathieson Street to comply with the Parramatta Road Corridor Urban Transformation Strategy's (PRCUTS) requirement of providing walking and cycling connection along Mathieson Street towards Johnstons Creek;
- New public plaza(s) at the intersection of Mathieson Street, Parramatta Road and Pyrmont Bridge Road

It is noted that this matter is yet to be reported to Council, nor undergone public exhibition.

Similarly, Council is assessing the supporting site-specific DCP, and it is anticipated that outcomes of this public exhibition process being undertaken (and any community and / or stakeholder concerns) will assist in informing the drafting/ reporting of Council's site-specific DCP.

It is of high importance that the finalisation of the LEP for this Planning Proposal acknowledges these outstanding matters relating to Planning Agreement and site-specific DCP.

Recommendation 3:

Council strongly urges DPE as the Local Plan Making Authority to consider delaying the date when this LEP amendment comes into effect to allow sufficient time to address local infrastructure matters and include an LEP clause that prevents the determination of a development application on the site until a site-specific DCP is in place. This is critical to ensuring that this Gateway site in the Camperdown health and education precinct sets a good precedent for future developments with respect to built form and public domain outcomes.

3. Built form and urban design

Council considers that the potential redevelopment of the full block bound by Pyrmont Bridge Road, Water Street and Mathieson Street, rather than the current site arrangement has the potential to provide greater public benefits by resolving issues relating to vehicular access, connectivity and overshadowing. It also provides the opportunity to create larger floor plates for employment uses and better address bulk and scale and urban design impacts, particularly when there is interest from the adjoining and nearby sites to redevelop as part of the biomedical health precinct.

Whilst these are detailed matters for consideration as part of the future DCP, the proposed built form should consider:

- all recommendations as outlined in Design Inc's urban design peer review report dated September 2021;
- greater setbacks particularly on the upper levels to reduce overshadowing impacts;
- appropriate separation distances and building treatments to not preclude redevelopment potential of adjacent sites; and
- appropriate active ground floor interface along Pyrmont Bridge Road whilst being responsive to flooding issues.

Recommendation 4:

It is strongly recommended that the DPE include an LEP clause that prevents the determination of a development application on the site until a site-specific DCP is in place for Council to satisfactorily address the abovementioned detailed design matters. In addition, the LEP clause should outline the matters of consideration for the DCP such as bulk and scale, amenity, traffic, public domain, access, and environmental performance.

4. Public Domain

Council's assessment of the Planning Proposal in October 2021 identified the following opportunities for delivering community and public domain benefits:

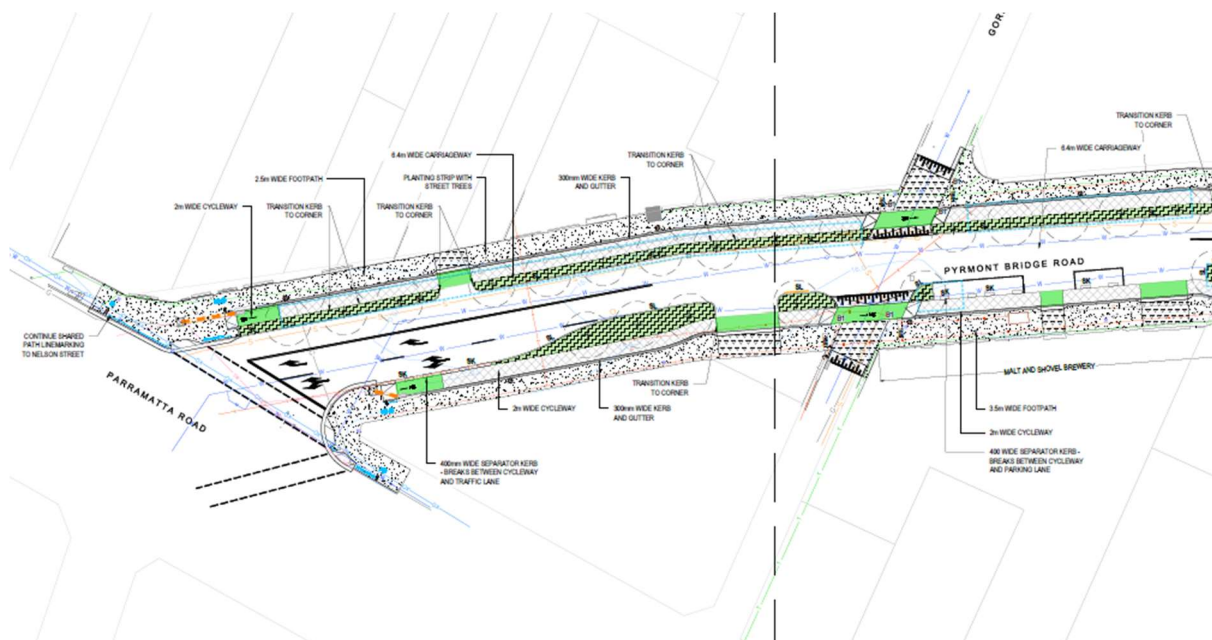
- an attractive built form and public domain which will deliver a gateway building aligned with the strategic objectives for the Camperdown precinct (see description of Council's Draft Structure Plan below)
- a new landscaped public plaza and "Shared Zone" along Mathieson Street which will link with Council's proposed Shared Zone along Cahill Street/Lane (see description of Council's works along Cahill Lane below)

- provision of walking and cycling connections along Mathieson Street between Cahill Street and Parramatta Road and enhance safety through creation of a “Shared Zone”
- footpath widening and associated land dedications along Cahill Street, Mathieson Street, Parramatta Road and Pyrmont Bridge Road to contribute to public domain improvements

The current design scheme as per the public exhibition of this Planning Proposal raises safety concerns regarding potential conflict between cyclists, pedestrians, and cars/service vehicles due to the proposed vehicular access via Pyrmont Bridge Road.

In implementation of PRCUTS Urban Amenity Improvement Plan (UAIP), Council has developed the Pyrmont Bridge Road Masterplan (80% Detailed Design) to provide a new cycling link along Pyrmont Bridge Road. The proposed access via Pyrmont Bridge Road should be restricted or adequately managed through limited access as it is envisaged to be a high street with high levels of pedestrian and cyclist traffic flow.

Figure 1: Pyrmont Bridge Road Detailed Design Works



The proposal requires further traffic and access modelling and redesign, to ascertain how vehicle access can be best accommodated for the site, in accordance with TfNSW requirements.

5. Cahill Street Masterplan

Council has secured funding for new shared zones and public spaces along Cahill Street and Cahill Lane as part of the NSW Government’s Public Spaces Legacy Program ([122-130 Pyrmont Bridge Road](#), [206 Parramatta Road, Annandale – Inner West Council \(nsw.gov.au\)](#) see Appendix 15.

This will intersect with the Mathieson Street Shared Zone which can be provided through this Planning Proposal. This proposal has the potential to contribute towards following public domain works:

- Provide a minimum of 6m setback and land dedication along the Mathieson Street frontage;

- Create a new "Shared zone" along Mathieson Street between Cahill Street and Parramatta Road to engender a sense of a larger and enhanced space for cyclists, pedestrians, and vehicles. This will link to Council's proposed Shared Zone along Cahill Street/Lane as well as provide part of the PRCUTS desired pedestrian and cycling link to the Johnstons Creek corridor;
- Provide at least 1.5m ground floor and first floor setback along Pyrmont Bridge Road to facilitate footpath widening and landscaping; and
- Refine the built form at the intersection of Mathieson Street, Parramatta Road and Pyrmont Bridge Road to allow a sufficient setback and sight lines for cyclists to round the corner to the Pyrmont Bridge Road cycleway safely.

The Planning Proposal and supporting DCP must incorporate the above-mentioned public domain works, to the satisfaction of both Council and Transport for NSW. In doing so, the following key outcomes to be achieved through this Planning Proposal include:

- To enhance and activate the public domain, including activating ground floor land uses on Pyrmont Bridge Road, Parramatta Road, and part of Mathieson Street.
- To enhance the public domain around the site, including upgraded landscaping, pedestrian access and cycleway to Pyrmont Bridge Road and Mathieson Street.
- To create a shared zone with improved public domain on Mathieson Street.
- To provide appropriate pedestrian and vehicular access and servicing arrangements to allow the efficient operation of the proposed development on the site.
- To encourage active transport and support public transport mode share.

Council will ensure the above requirements are incorporated into a Council site-specific DCP relating to this Planning Proposal, however it is then imperative that Council's site specific DCP is both reported to Council for consideration, publicly exhibited and adopted prior to development proceeding on the site as also noted in the above recommendations.

Council is committed to delivering local and State Government's aspirations in supporting Australia's innovation sectors and realising Camperdown's role in supporting surrounding health and education institutes. This Planning Proposal relates to a site which is in a key location of this future biomedical precinct, and therefore requires coordinated efforts at local and State level to ensure it complements the desired future character and contributes satisfactorily to land use and public domain outcomes despite being ahead of the wider masterplan process.

Council requests to meet with the DPE to clarify and further discuss the matters outlined in this letter. Please contact Gunika Singh, Acting Team Leader, Strategic Planning on gunika.singh@innerwest.nsw.gov.au to arrange for an appropriate time for this meeting.

Regards



Daniel East

Strategic Planning Manager

INNER WEST COUNCIL DRAFT SUBMISSION – EMPLOYMENT ZONE REFORMS

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TABLE 1. LAND USE TABLE TRANSLATION

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Topic	Current Zone	Proposed Zone	Council Comments
1	B1 Neighbourhood Centres B2 Local Centres	E1 Local Centre	<p>The E1 Local Centre zone merges the B1 Neighbourhood Centre and B2 Local Centre zones.</p> <p><u>Objectives</u></p> <p>The E1 Local Centre zone objectives in the Inner West Land Use Table Translation (IWLUTT) align with the objectives in the in the draft Inner West Local Environmental Plan 2022 (IWLEP 2022). However, the IWLUTT includes an objective referring to Ashfield Town Centre and should be deleted as the Ashfield Town Centre will be zoned E2 Commercial Centre and this objective is consequently not required. Also refer to E2 Commercial Centre Zone in this table.</p> <p><u>Land Uses</u></p> <p>The Inner West Employment and Retail Lands Strategy (ERLS) Inner West Employment and Retail Lands Strategy identified a centres hierarchy, and the draft IWLEP 2022 zoning generally reflects this hierarchy, with the higher order centres being zoned B2 Local Centres and the smaller remaining centres being B1 Neighbourhood Centre. Ashfield is the highest order centre in the Inner West and hence will be zoned E2 Commercial Centre.</p> <p>This differentiation between centres is lost with the E1 Local Centre Zone but can be retained, to some extent, through the prohibition of certain land uses that are not considered appropriate in the smaller centres and allowing them in the former B2 Local Centres. These uses includes advertising structures, registered clubs, restricted premises, sex services premises, tourist and visitor accommodation, vehicle and repair stations and vehicle sales or hire premises. The IWLUTT would then allow these uses through a Local Provision and Key Site Maps in the former B2 Local Centres.</p> <p>It also noted that the IWLUTT for E1 Local Centre prohibits residential accommodation other than shop top housing and seniors housing and is similar to the current B2 Local Centre zone. The current B1 Neighbourhood Centre zone, however, also allows dwelling houses, and these will be prohibited under the E1 Local Centre zone.</p>

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			<p>It is considered that prohibiting dwelling houses will ensure the retention of retail, business and commercial uses that are required to support the local area. Residential development in the form of shop top housing will continue to be permitted.</p> <p>Council supports the use of Local Provisions and Key Site Maps to differentiate between centre types.</p> <p>The exhibited IWLUTT prohibited advertising structures, vehicle repair stations and vehicle sales or hire premises in the E1 Local Centre zone and included a new Local Provision to permit these uses in the B2 Local Centre zoned areas that would be implemented through a Key Site Map.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Deletion of objective from the E1 Local Centre zone referring to “<i>strengthening the viability and vitality of the Ashfield Town Centre</i>” as this objective is included in the E2 Commercial Centre zone. 2. The use of Local Provisions and Key Site Maps in the E1 Local Centre zone to differentiate between centre types is supported. <p>Also refer to Table 3 Local Provisions Recommendations 16 and 17.</p>
2	New Zone	E2 Commercial Centre	<p>The E2 Commercial Centre has no equivalent in the draft IWLEP 2022.</p> <p>The ERLS centres hierarchy identifies Ashfield as the highest order centre in the Inner West, comprising the largest mix of retail, commercial, administrative, entertainment and community facilities.</p> <p>It is proposed the Ashfield Town Centre be zoned E2 Commercial Centre to reflect this role.</p> <p><u>Objectives</u></p> <p>The objectives are supported.</p> <p><u>Land Uses</u></p> <p>The exhibited IWLUTT prohibits residential accommodation in the zone and only permits seniors housing. It has not included shop top housing as permitted with consent, even though the objectives include “<i>to enable residential development that is consistent with the Council’s</i></p>

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			<p><i>strategic planning for residential development in the area</i>". Shop top housing requires to be included as permitted with consent.</p> <p>The IWLUTT includes advertising structures and sex services premises as prohibited. These uses are permitted in the current B2 Local Centre and should therefore not be prohibited in the E2 Commercial Centre. Advertising structures and sex services premises should be deleted from prohibited and be considered as permitted with consent under the category of "any other development" (AOD).</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 3. Insert shop top housing as permitted with consent in the E2 Commercial Centre zone. 4. Delete advertising structures and sex services premises as being prohibited in the E2 Commercial Centre zone. These uses will be permitted with consent under the category of AOD.
3	B5 Business Development B6 Enterprise Corridor B7 Business Park	E3 Productivity Support	<p>This zone merges the B5 Business Development, B6 Enterprise Corridor and B7 Business Park zones to the E3 Productivity Support zone. The focus of each of the draft IWLEP 2022 zones is summarised below.</p> <ul style="list-style-type: none"> • B5 Business Development – focus being warehouse and business uses and specialised retail premises requiring large floor plates • B6 Enterprise Corridor – businesses along main roads with business, office, retail and light industrial uses, whilst limiting retail • B7 Business Park – a range of office and light industrial uses, allowing other land uses that service/meet the day to day needs of workers and creative industries. Through local provisions residential accommodation is allowed where certain gross floor area requirements for mixed use are met. <p><u>Objectives</u></p>

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			<p>The objectives largely align with the draft IWLEP 2022 objectives for the three zones of B5 Business Development, B6 Enterprise Corridor and B7 Business Park.</p> <p><u>Land Uses</u></p> <p>The merging of these zones to form the E3 Productivity Support zone results in the loss of the zone nuances, though there is some opportunity to use Local Provisions to achieve the strategic intent of the existing zones. These are dealt with in more detail later in Tables 2 and 3.</p> <p>Recommendation:</p> <p>5. That the nuances of each of the current zones (B5, B6 and B7) be implemented through Local Provisions with Key Site Maps.</p> <p>Refer to Recommendations 12, 13, 18 and 19 in Table 2 Local Provisions – Existing and Table 3 Local Provisions – New.</p>
4	IN1 General Industrial IN2 Light Industrial	E4 General Industrial	<p>This zone merges the IN1 General Industrial zone and the IN2 Light Industrial zone.</p> <p><u>Objectives</u></p> <p>The objectives largely align with the draft IWLEP 2022 for the two zones of IN1 General Industrial and IN2 Light Industrial.</p> <p><u>Land Uses</u></p> <p>The historical development of land in the Inner West has resulted in commercial, industrial and residential uses occurring in close proximity to each other. Many of the IN2 Light Industrial employment areas are small, often fine-grained in nature, fragmented and bounded by sensitive land uses (e.g., low density residential development).</p>

TABLE 1. LAND USE TABLE TRANSLATION

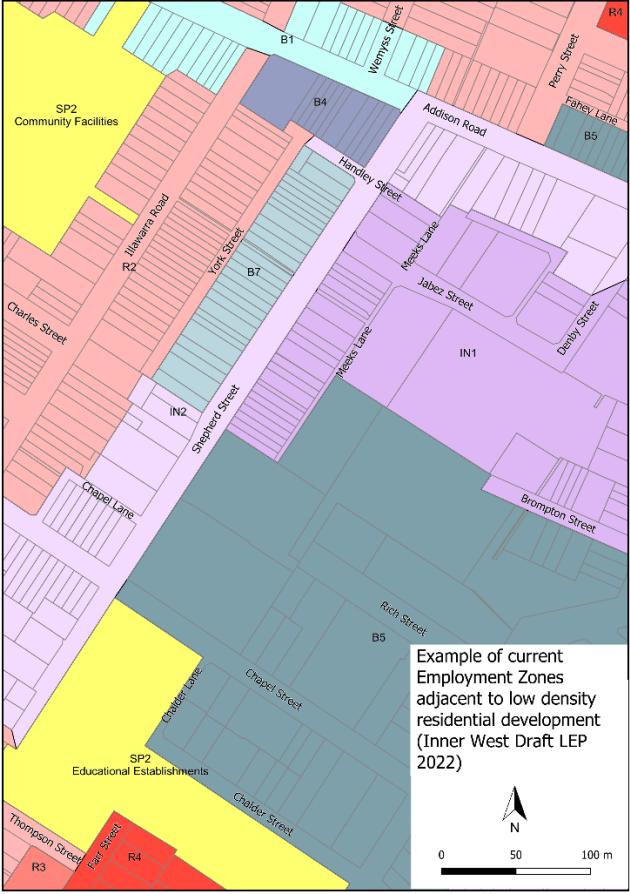
Topic	Current Zone	Proposed Zone	Council Comments
			 <p>Example of current Employment Zones adjacent to low density residential development (Inner West Draft LEP 2022)</p>

Figure 1. Low density residential areas adjacent to IN2 Light Industry zone at Addison Road/Shephard Street, Marrickville.

TABLE 1. LAND USE TABLE TRANSLATION

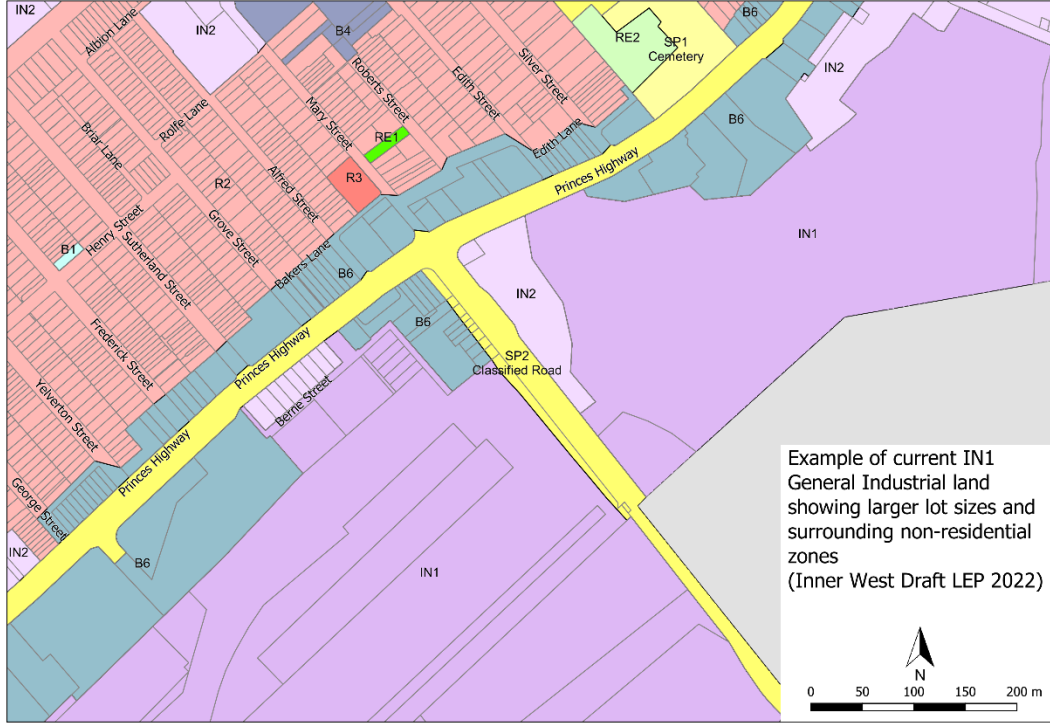
Topic	Current Zone	Proposed Zone	Council Comments
			<p>The IN1 General Industrial areas, by contrast, generally tend to have larger lot sizes, are contiguous and located away from residential development (e.g., areas close to Sydney Airport at St Peters and Tempe).</p>  <p>Example of current IN1 General Industrial land showing larger lot sizes and surrounding non-residential zones (Inner West Draft LEP 2022)</p>

Figure 2. IN1 General Industrial Zones and separation from low density residential zones at Canal Road/Princes Highway, St Peters.

The merging of the IN1 General Industrial and IN2 Light Industrial zones means that land uses which could have potential adverse impacts on amenity are now able to be located adjacent to more sensitive land uses, including locations adjacent to low density residential. For example,

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			<p>general industry is a mandated use in the IWLUTT, and unlike light industry, does not limit activity by virtue of adverse amenity impacts on a neighbourhood.</p> <p>DPE has advised it will not consider submission points in relation to mandated uses.</p> <p>Notwithstanding, it is considered appropriate for Council concerns to be placed on record in relation to this matter, namely general industry should not be a mandated use in the E4 General Industrial zone so as to ensure adverse amenity impacts are minimised in areas adjacent to low density housing zones and other sensitive uses.</p> <p>Uses that are not mandated and not considered appropriate to be located adjacent to sensitive land uses, such as low density residential uses, can be prohibited in the E4 General Industrial zone and then permitted through a Local Provision on the IN1 General Industrial land.</p> <p>The exhibited IWLUTT therefore prohibits vehicle body repair shops in the E4 General Industrial zone and includes a Local Provision to permit them in the existing IN1 General Industrial zone through a Key Site Map (refer to Table 3 Recommendation 20). This is supported.</p> <p>However, the IN2 Light Industrial zoned land at 4-10 Hill Street and 21-37 John Street, Leichhardt permits vehicle body repair shops in the draft IWLEP 2022. Therefore, it is recommended that the subject land should be included in the Key Site Map associated with the proposed Local Provision (Refer to Recommendation 21).</p> <p>Recommendation</p> <p>6. General industry should not be a mandated use in the E4 General Industry zone to ensure adverse amenity impacts are minimised in areas adjacent to low density housing zones. They should instead be permissible on IN1 General Industrial lands through a Local Provision and Key Site Map.</p>
5	B4 Mixed Use	MU1 Mixed Use	<p>The MU1 Mixed Use is the new proposed B4 Mixed Use zone.</p> <p><u>Objectives</u></p> <p>The objectives align with the draft IWLEP 2022 and are supported.</p>

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			<p><u>Land Uses</u></p> <p>The IWLUTT for the MU1 Mixed Use zone as exhibited is supported.</p> <p>Recommendation</p> <p>7. The MU1 Mixed Use zone is supported.</p>
6	New Zone	W4 Working Waterfront	<p>W4 Working Waterfront is a new zone with no comparison in the draft IWLEP 2022.</p> <p><u>Objectives</u></p> <p>The Objectives are supported.</p> <p><u>Land Uses</u></p> <p>A number of properties in Balmain East are currently zoned IN2 Light Industrial.</p> <p>Of these, two sites are active waterfront enterprises that rely on a direct relationship with the foreshore and include water leases. These sites are suited to being zoned W4 Working Waterfront. These two sites are located at 57 Campbell Street, Balmain and 7 Cooper Street, Balmain.</p> <p>Additional sites located in Duke Place and Duke Street are also zoned IN2 Light Industrial but are not used for that purpose, being dwelling houses. DPE have advised that these will require to be zoned W4 Working Waterfront as part of the Employment Zones Review IWLUTT, with any change requiring to be considered through a planning proposal.</p> <p>The exhibited IWLUTT for the W4 Working Waterfront is supported subject to advertising structures being inserted as prohibited given the importance of maintaining and protecting the visual qualities of Sydney Harbour. Note that business identifications signs would be permitted as AOD.</p> <p>Recommendation</p> <p>8. Insert advertising structures as Prohibited in the W4 Working Waterfront zone.</p>
7	Camperdown Precinct	Excluded Area	<p>The Camperdown Precinct is a mix of B2 Local Centre, B4 Mixed Use, B7 Business Park and IN2 Light Industrial zones under the draft IWLEP 2022.</p>

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			<p>The Camperdown Precinct forms part of Tech Central (previously called Camperdown Collaboration Area) and is an essential component of the Greater Sydney Region Plan's Eastern Harbour City Innovation Corridor.</p> <p>The vision for the Camperdown Precinct is for:</p> <p><i>"a globally significant biotechnology precinct which blends health, education and technological innovation in research and commercialisation activities. A mix of retail, design, creative and small-scale manufacturing enterprises complement the core biotech activities."</i> (Camperdown Land Use Study, SGS and Economics 2020).</p> <p>Under the Employment Zones Review these zones would be translated to E1 - Local Centre, MU1 – Mixed Use, E3 - Productivity Support and E4 – General Industry. These proposed zones, with their respective mandated uses, introduce additional land uses that are currently prohibited. Should they be taken up prior to holistic planning of Camperdown Precinct being completed, it could jeopardise the work currently underway and inhibit the realisation of its future potential as a health and education precinct.</p> <p>The Technical Review by Council Officers proposed this precinct be excluded from the Employment Zones self-repealing SEPP (State Environmental Planning Policy). This would allow for the completion of the Camperdown Structure Plan and future Planning Proposal for the precinct that would support the growth of a globally significant biotechnology precinct.</p>

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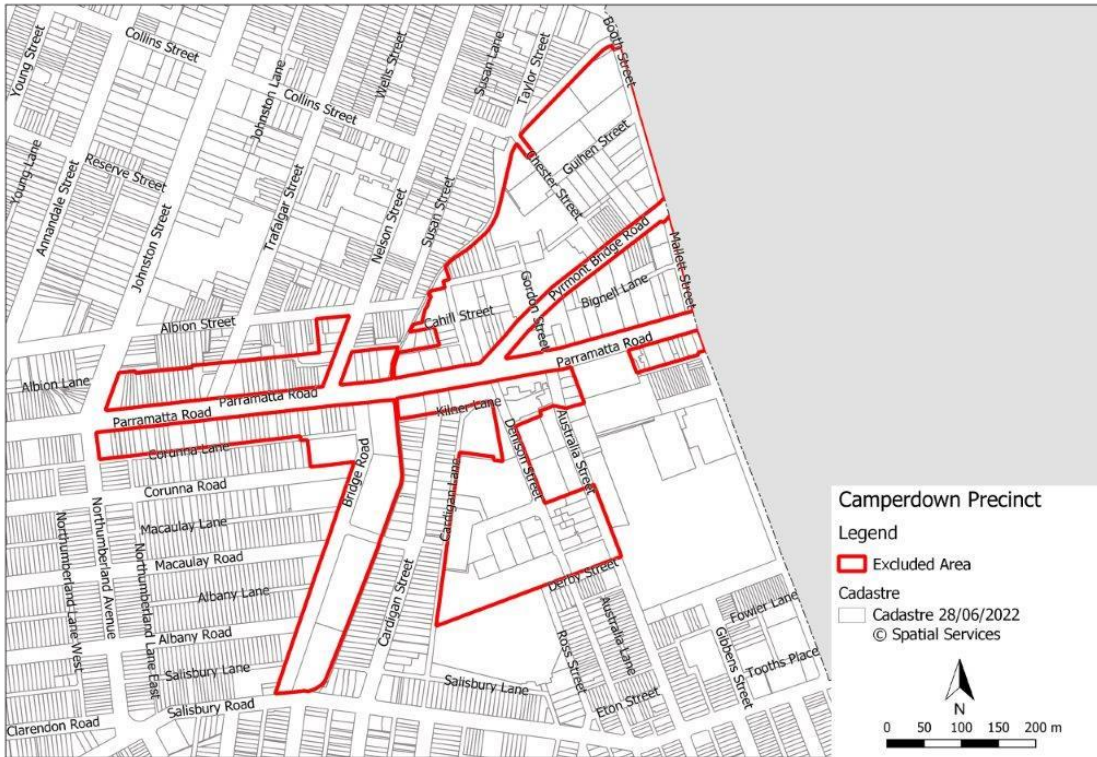
Topic	Current Zone	Proposed Zone	Council Comments
			 <p>Figure 3. Camperdown Precinct - Excluded Area</p> <p>DPE supported this approach, and the Camperdown Precinct was excluded from the Employment Zones Reform exhibition. This means the current employment zones (B2 Local Centre, B4 Mixed Use, B7 Business Park and IN2 Light Industrial) will continue to apply in this precinct.</p>

TABLE 1. LAND USE TABLE TRANSLATION			
Topic	Current Zone	Proposed Zone	Council Comments
			Recommendation 9. Council supports the Camperdown Precinct being an excluded area to allow for the completion of the Camperdown Structure Plan and future Planning Proposal for the precinct that would support the growth of a globally significant biotechnology precinct.
8	St Peters Triangle	Excluded Area	<p>The St Peters Triangle is a complex area comprising B5 – Business Development, B6 – Enterprise Corridor and B7 – Business Park zoned land. There are a number of Local Provisions, APUs and a Master Plan currently applying to the Precinct. The area is in transition to a mixed use precinct including residential accommodation, light industrial and business.</p> <p>The E3 – Productivity Support zone applied across the precinct would not allow for the nuanced land uses required to continue implementing the master plan and vision.</p> <p>Consequently, Council supports the St Peters Triangle precinct being excluded from the Employment Zones Reform exhibition. This means the current employment zones (B5 – Business Development, B6 – Enterprise Corridor and B7 – Business Park zones) will continue to apply to this precinct.</p> <p>DPE subsequently advised that St the St Peters Triangle may require to be translated to the new zones. Further work is now being undertaken to assess how this can be progressed.</p> Recommendation 10. Council supports the St Peters Triangle being an excluded area to allow for the continuing implementation of the masterplan and vision until further investigation is progressed.

TABLE 1. LAND USE TABLE TRANSLATION

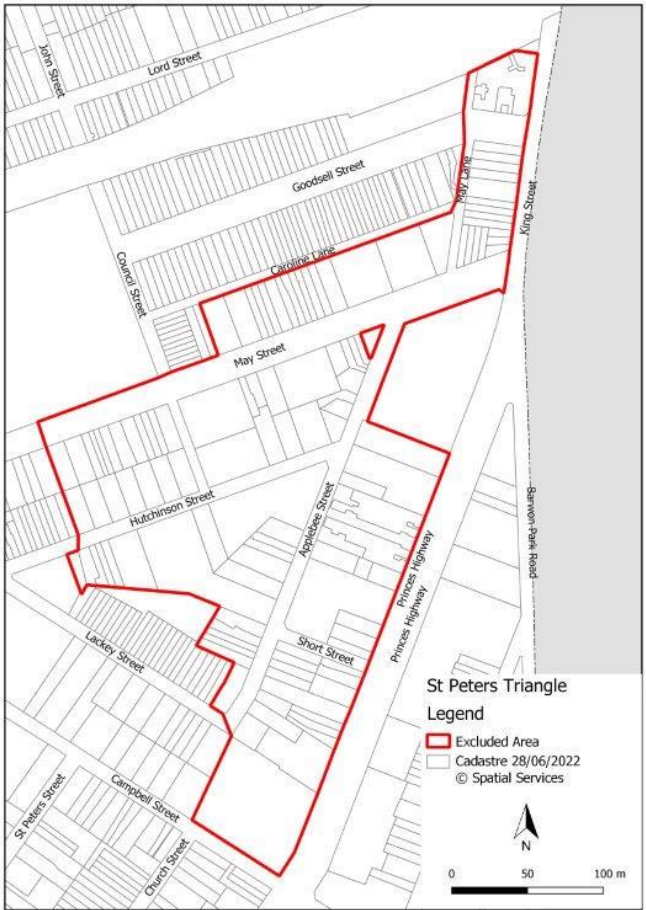
Topic	Current Zone	Proposed Zone	Council Comments
			 <p>St Peters Triangle Legend</p> <ul style="list-style-type: none"> Excluded Area Cadastre 28/06/2022 © Spatial Services <p>0 50 100 m</p>

Figure 4. St Peters Triangle – Excluded Area

TABLE 2. LOCAL PROVISIONS - EXISTING

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Topic	Clause	Current Provision	Implication for Implementation	Council Comments
9	Cl.6.13	Permits residential accommodation in B1 Neighbourhood Centre, B2 Local Centre and B4 Mixed Use zones subject to meeting criteria relating to mixed use, active frontages and built form/function.	<p>This clause controls the location of residential accommodation in the draft IWLEP 2022 and applies to the following zones:</p> <ul style="list-style-type: none"> • B1 Neighbourhood Centre • B2 Local Centre • B4 Mixed Use <p>It requires mixed use development that includes residential accommodation to have an active street frontage and the building is compatible with the desired character of the area in relation to bulk, form, uses and scale.</p> <p>The new zones are E1 Local centre and MU1 Mixed Use zones.</p>	<p>The exhibited IWLUTT Local Provision section references the E1 Local Centre and MU1 Mixed Use zones. There is no reference to the E2 Commercial Centre zone. It is considered this Local Provision should apply to all mixed use development business zones that includes residential development to ensure an active street frontage and that building design is compatible with the desired character of the area in relation to bulk, form, uses and scale.</p> <p>Recommendation</p> <p>11. Cl 6.13 be retained and amended to refer to E1 Local Centre, E2 Commercial Centre and MU1 Mixed Use zones.</p>
10	Cl. 6.21	Permits office and business premises in the IN2 Light Industrial and B7 Business Park zones provided they are used for creative purpose such as media, advertising, fine arts and craft, design, film and television, music, publishing, performing arts, cultural heritage institutions or other related purposes.	Business and office premises are mandated in the E3 Productivity Support Zone (B5, B6 and B7 zones) but not in the E4 General Industrial zone (IN2 and IN1 zones).	<p>The exhibited IWLUTT Cl.6.21 recommended reference to B7 Business Park zone be deleted and is supported. It also proposed to continue to apply to the former IN2 zoned lands through a Local Provision and a Key Site Map that maps existing IN2 lands.</p> <p>Recommendation</p> <p>12. Amendment of Clause 6.21 by deleting reference to B7 (now E3) and applying clause to</p>

TABLE 2. LOCAL PROVISIONS - EXISTING				
Topic	Clause	Current Provision	Implication for Implementation	Council Comments
				former IN2 zoned land through a Key Sites Map is supported.
11	Cl.6.22	Permits dwellings or residential flat buildings (RFB) in Zone B7 Business Park in association with non-residential uses subject to meeting certain criteria.	Clause 6.22 permits dwellings or RFBs in Zone B7 Business Park in association with non-residential uses subject to meeting certain criteria.	<p>The B7 Business Park zone is now part of the E3 Productivity Support Zone, which is a merger of the B5, B6, and B7 zones. Therefore, for this to continue to apply to B7 Business Park zoned lands it requires to be implemented through a Key Sites Map which maps the B7 Business Park zone.</p> <p>The exhibited LUTT Local Provision clause 6.22 proposed retaining the provision and is supported.</p> <p>Recommendation</p> <p>13. Retain Clause 6.22 and apply to former B7 Business Park zoned land (now E3) through a Key Site Map.</p>
12	Cl. 6.23	Permits residential accommodation as part of mixed use development in certain business zones subject to meeting certain criteria.	Clause 6.23 permits limited residential accommodation on certain land zoned B5 and B6 as part of mixed use development subject to meeting certain criteria. The land to which this clause applies is identified as “Area 8”, “Area 9”, “Area 10”, “Area 11” and “Area 12” on the Key Sites Map of the Draft IWLEP 2022. All of these Areas are located in the St Peter Triangle Precinct and have been exhibited as being excluded from the Employment Zones Review.	<p>The Areas to which this clause apply are located in the St Peters Triangle which is an excluded area. Therefore, the clause should be retained with no change.</p> <p>However, this recommendation is reliant on the St Peters Triangle continuing to be an Excluded Area. If this changes then an alternative approach will be required.</p> <p>Recommendation</p> <p>14. Retain Cl.6.23 with no amendments as it applies to land located in the St Peters Triangle, an excluded area from the Employment Zone Review.</p>

TABLE 3. LOCAL PROVISIONS – NEW CLAUSES

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Topic		Intent of New Clause	Council Comments
13	New Clause	To allow for registered clubs, restricted premises and sex services premises in certain locations within the E1 Local Centre zone. The provision to be implemented through a Key Site Map.	<p>The E1 Local Centre results from the merging of the B1 Neighbourhood Centre and B2 Local Centre. The current B1 Neighbourhood Centres are for the provision of a range of small scale retail, business and community services for the local community. These centres are much smaller in size than the B2 Local Centres, often comprising just a few shops and in some instances just a single property.</p> <p>It is considered that registered clubs, restricted premises and sex services premises are inconsistent with the scale of the neighbourhood centres and the amenity of the surrounding low density residential areas. They would be more appropriately located within larger centres. Consequently, they are recommended as additional permitted uses within the B2 Local Centre zone through a Local Provision. To be implemented through a Key Sites Map. This is supported.</p> <p>Recommendation</p> <p>15. That a new Local Provision be inserted to allow registered clubs, restricted premises and sex services premises in the former B2 Local Centre zoned areas within the E1 Local Centre zone is supported.</p>
14	New Clause	<p>To allow for advertising structures, tourist and visitor accommodation, vehicle and repair stations and vehicle sales or hire premises in certain locations within the E1 Local Centre zone.</p> <p>The provision to be implemented through a Key Site Map.</p>	<p>As with the previous proposed provision, it is considered that advertising structures, tourist and visitor accommodation, vehicle and repair stations and vehicle sales or hire premises would be more appropriately located within larger centres. They are prohibited in the current B1 neighbourhood zone. Consequently, they are recommended as additional permitted uses within the B2 Local Centre zone through a Local Provision and Key Sites Map. This is supported.</p>

TABLE 3. LOCAL PROVISIONS – NEW CLAUSES			
Topic		Intent of New Clause	Council Comments
			<p>Recommendation</p> <p>16. That a new Local Provision be inserted to allow advertising structures, tourist and visitor accommodation, vehicle and repair stations and vehicle sales or hire premises in the former B2 Local Centre zoned areas within the E1 Local Centre zone is supported.</p> <p>17. That consideration be given to combining this clause with the previous clause (refer to Recommendation 15) allowing registered clubs, restricted premises and sex services premises as they both apply to the same mapped area through a Key Site Map.</p>
15	New Clause	<p>To allow for amusement centres, entertainment facilities and registered clubs in certain locations within the E3 Productivity Support zone</p> <p>The provision to be implemented through a Key Site Map.</p>	<p>The E3 Productivity Support zone merges the B5 Business Development, B6 Business Enterprise and the B7 Business Park zones. Each of these zones were applied to reflect the varied character and roles of each of the zones/precincts as noted below.</p> <ul style="list-style-type: none"> • B5 – focus on warehouse and business uses and specialised retail premises requiring large floor plates • B6 – businesses along main roads with business, office, retail and light industrial uses whilst limiting retail • B7 – a range of office and light industrial uses, allowing other land uses that service/meet the day to day needs of workers, creative industries and through Local Provisions, residential accommodation is allowed if meeting certain gross floor area requirements for mixed use.

TABLE 3. LOCAL PROVISIONS – NEW CLAUSES			
Topic		Intent of New Clause	Council Comments
			<p>Amusement centres, entertainment facilities and registered clubs are currently only permitted in the B5 – Business Development and B6 – Enterprise Corridor zoned areas.</p> <p>The intent of this Local Provision is therefore to continue to restrict amusement centres, entertainment facilities, registered clubs and restricted premises to the B5 and B6 zoned areas within the E3 Productivity Support zone to ensure the focus of the small B7 precincts is maintained. This is supported.</p> <p>Recommendation</p> <p>18. That a new Local Provision to allow amusement centres, entertainment facilities and registered clubs in the current B5 Business Development and B6 Enterprise Corridor within the E3 Productivity Support zone is supported.</p>
16	New Clause	<p>To allow for resource recovery and restricted premises in certain locations within the E3 Productivity Support zone</p> <p>The provision to be implemented through a Key Site Map.</p>	<p>The E3 Productivity Support zone merges the B5 Business Development, B6 Business Enterprise and the B7 Business Park zones. Resource recovery and restricted premises are only permitted in the B6 – Enterprise Corridor zone.</p> <p>As noted, the character and roles of the B5 Business Development, B6 Business Enterprise and the B7 Business Park zones are as follows:</p> <ul style="list-style-type: none"> • B5 – focus warehouse and business uses and specialised retail premises requiring large floor plates • B6 – businesses along main roads with business, office, retail and light industrial uses whilst limiting retail • B7 –a range of office and light industrial uses, allowing other land uses that service/meet the day to day needs of workers, creative industries and through Local Provisions, residential accommodation is allowed if meeting certain gross floor area requirements for mixed use.

TABLE 3. LOCAL PROVISIONS – NEW CLAUSES			
Topic		Intent of New Clause	Council Comments
			<p>Both the resource recovery and restricted premises uses are incompatible with the established and desired future character of the B5 Business Development and B7 Business Park areas within the E3 Productivity Support zone. There may also be unacceptable amenity impacts on more sensitive land uses as both the B5 Business Development and B7 Business Park have Local Provisions or APUs that permit residential accommodation on certain sites as part of a mixed use development.</p> <p>The intent of this provision is therefore to permit resource recovery and restricted premises only in B6 Enterprise Corridor zoned areas through a Local Provision and Key Site Map. This is supported.</p> <p>Recommendation</p> <p>19. That a new Local Provision to allow resource recovery and restricted premises on B6 zoned land within the E3 Productivity Support zone is supported.</p>
17	New Clause	<p>To allow for vehicle body repair in certain locations within the E4 General Industrial Zone.</p> <p>A new Local Provision to allow for vehicle body repair workshops as a permitted use on former IN1 land.</p> <p>The provision to be implemented through a Key Site Map.</p>	<p>Vehicle body repair shops are currently permitted with consent in the IN1 General Industrial Zone.</p> <p>The E4 General Industrial zone merges the IN1 General Industrial and IN2 Light Industrial Zones. The historical development of land in the Inner West has resulted in commercial, industrial and residential uses occurring in close proximity to each other. Many of the IN2 Light Industrial zoned areas are small, often fine-grained in nature, fragmented and bounded by sensitive land uses. The IN1 General Industrial areas by contrast generally tend to have larger lot sizes, are contiguous and located away from residential development.</p> <p>Vehicle body repair shops have the potential to have unacceptable amenity impacts on sensitive land uses.</p>

TABLE 3. LOCAL PROVISIONS – NEW CLAUSES			
Topic		Intent of New Clause	Council Comments
			<p>The exhibited IWLUTT prohibited vehicle body repair shops in the E4 General Industrial zone and included a Local Provision to allow the use in the IN1 General Industrial zone. This is supported.</p> <p>However, land at 4-10 Hill Street and 21-37 John Street Leichhardt also permits vehicle body repair shops under Schedule 1 Additional Permitted Use, Clause 16 (draft IWLEP 2022). It is considered that as the remainder of Clause 16 will no longer be relevant (refer to Table 4) 4-10 Hill Street and 21-37 John Street Leichhardt should be included in the Key Sites Map for this proposed new Clause.</p> <p>Recommendation</p> <p>20. That a new Local Provision to allow vehicle body repair shops in IN1 General Industrial zoned land within the E4 General Industrial zone is supported.</p> <p>21. That land at 4-10 Hill Street and 21-37 John Street Leichhardt be included in the Key Sites Map to implement Recommendation 20.</p>

TABLE 4. SCHEDULE 1 ADDITIONAL PERMITTED USES – DRAFT INNER WEST LEP 2022

TABLE 4. SCHEDULE 1 – ADDITIONAL PERMITTED USES				
Topic	Clause	Permits	Zoning	Council Comments
18	Cl. 16, use of certain lands at 4-10 Hill Street and 21-37 John Street Leichhardt	Cl. 16 of Schedule 1 permits development for freight transport facilities, general industries, resource recovery facilities, sewage treatment plants, timber yards and vehicle body repair workshops.	Under draft IWLEP 2022 this land is zoned IN2 Light Industrial and the APUs listed would otherwise be prohibited in this zone. The proposed E4 general Industrial zone permits freight transport facilities, general industries, resource recovery facilities, sewage treatment plants and timber yards with consent.	<p>The new E4 General Industry zone merges the IN2 Light Industrial and the IN1 General Industrial zones. With the exception of vehicle body repair workshops, these uses are now permitted with consent in the E4 General Industrial zone.</p> <p>Vehicle body repair shops are proposed to be prohibited in the E4 General Industrial zone and then permitted through a new Local Provision (refer Table 3, Recommendation 20) on former IN1 General Industrial zoned land. To continue to permit vehicle body repair shops at 4-10 Hill Street and 21-37 John Street, Leichhardt it will be necessary to include this land in the Key Sites Map and this land is included in Recommendation 21.</p> <p>Clause 16 of Schedule 1 is no longer relevant and should be deleted.</p> <p>Recommendation 22. Delete Clause 16 of Schedule 1.</p>
19	Cl. 37, use of certain land at 9-51 May Street and 58-132 May Street, St Peters.	Permits development for specialised retail premises and retail premises.	Under draft IWLEP 2022 this land is zoned a mix of B5 Business development and R1 General Residential. Specialised retail premises are a mandated use in the E3 Productivity Support zone.	<p>The land to which draft IWLEP 2022 Clause 37 applies is incorrectly described in the exhibited IWLUTT. The correct addresses are 9-51 May Street, 20- 56 May Street and 3 Applebee Street. However, the land subject to Clause 37 is also located in the St Peters Triangle and is an Excluded Area for the purpose of the Employment Zones Reform (Refer to Table 1, Recommendation 10 above). Consequently Cl. 37 should be retained with no amendment as it will continue to apply.</p> <p>Recommendation</p>

				23. Clause 37 of the draft IWLEP 2022 be retained, noting the correct addresses for the subject land, with no amendment as it continues to apply in the Excluded Area
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