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Gunika Singh
Team Leader Strategic Planning – Inner West Council
PO Box 14
Petersham NSW 2049

Dear Gunika,

PPAP/2023/0001 – LOCAL PLANNING PANEL MEETING RESPONSE | 11-11A EDINBURGH ROAD, MARRICKVILLE

1. OVERVIEW

Thank you for your time and attendance at the Inner West Local Planning Panel (**IWLPP**) meeting on 17 December 2024 relating to the National Storage (**the Proponent**) Planning Proposal PPAP/2023/0001 (**the PP**) for the land at 11-11A Edinburgh Road, Marrickville (**the site**). We have reviewed the IWLPP meeting minutes from 17 December 2024 including the decision of the panel and reasons for the decision relating to the PP.

This letter seeks to outline the Proponent's position on the reasons for decision to help advance the PP to a Council meeting in early 2025.

2. NATIONAL STORAGE POSITION

At the request of Inner West Council's strategic planning staff, we have outlined the Proponent's rationale and response to the IWLPP decision.

2.1. DECISION OF THE PANEL

The decision outlined in the IWLPP meeting minutes have been addressed, adopting the same lettering used in the IWLPP meeting minutes.

The Inner West Local Planning Panel informs Council that Planning Proposal PPAP/2023/0001 dated November 2024 to amend the Inner West Local Environmental Plan 2022 for 11 & 11A Edinburgh Road, Marrickville,

- a) warrants conditional support as it has sufficient strategic and site-specific merit to be submitted to the Minister for Planning for a Gateway determination in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979, and***

National Storage response: National storage support and agree.

- b) is conditionally supported because it raises several issues which require further refinement of the Proposal. The Panel's conclusions, and its recommendations on the contents of any planning provisions, are explained in the attached reasons for the decision.***

National Storage response: National Storage supports and agrees to work with Council to address the issues identified in the IWLPP conclusions and recommendations.

2.2. REASONS FOR THE DECISION OF THE PANEL

Each of the reasons outlined in the IWLPP meeting minutes have been addressed, adopting the same numbering used in the IWLPP meeting minutes.

- 1. In reaching its conclusion the Panel considered both the immediate circumstances related to this site and its context, and the potential long-term position.***

National Storage response: Noted.

- 2. The Planning Proposal enables a significant increase in the development potential for the site. This is considered to be in the public interest because it promotes more efficient use of land in an area of high demand for services but without significant adverse consequences for the locality. Support for this proposal essentially enshrines this site for services related uses. It explicitly excludes any potential for residential development on this site.***

National Storage response: National storage support and agree.

- 3. Limiting the increase in development potential to one use, self-storage, is considered appropriate because this use has a low traffic generation rate, and flooding can be effectively managed.***

National Storage response: National storage support and agree.

- 4. Permitting a maximum floor space ratio of 3.2:1 as requested is considered appropriate provided the floor space above the current floor space limit of 0.95:1 is only used for self-storage. However, the Panel is concerned that once built, the development could be used for other industrial purposes via available approval mechanisms such as State Environmental Planning Policy (Exempt & Complying Development Codes) 2008. During the meeting of the Panel, the proponent stated that imposing restrictions on land uses other than self-storage for this site is not opposed. The Panel recommends that Council obtain specialist legal advice on how the planning provisions can be drafted to ensure that the additional floor space is only available or permitted for self-storage purposes, and only the base floor space ratio applies to other permitted uses. Consideration should also be given to excluding this site from the operations of clause 4.6 of the Inner West Local Environmental Plan 2022.***

National Storage response: Noted. As mentioned by Nicholas Crang (Head of Acquisition and Development, National Storage) in the Local Planning Panel meeting, the Proponent does not oppose restrictions being placed on the site that limits the proposed maximum floor space ratio of 3.2:1 to be used only for self-storage purposes. We welcome the opportunity to work with Council on the drafting of the planning provisions.

However, the Proponent does oppose an exclusion of the operations of clause 4.6 of the *Inner West Local Environmental Plan 2022* applying to the site. Detailed design of any future proposed development has not been undertaken. By excluding the operations of clause 4.6 it imposes unknown restrictions on future development of the site. It limits the ability to be flexible and provide innovative solutions to adapt to the unique conditions of the site and requirements for the development of a self-storage facility.

5. ***Imposing a building height development standard of 30 metres is considered unnecessary in the circumstances where there is no existing height limit. On the contrary, as well as reflecting the existing circumstances, not having a height limit allows greater flexibility for future development options for the site. The Panel recognises there is potential for a mismatch between the proposed building height limit and maximum floor space ratio (FSR). The community representative expressed concern that a building of the height proposed would dominate all of the surrounding properties, and perhaps provide a precedent for other developments in locations that are not appropriate.***

National Storage response: Noted. The Proponent does not oppose the recommendation of the Panel to remove the introduction of a height control across the site. While a height control is proposed as part of the PP, it is not a fundamental component, and the Proponent agreed to concede this aspect of the PP.

6. ***The Planning Proposal includes a development standard for deep soil planting of 7.5% of site area. The Panel considers that, having regard to the significant uplift in the development potential for the site, a more appropriate deep soil planting percentage should be imposed. The Panel supports the target of 15% set by the NSW Greener Neighbourhood Guide for industrial sites. A planning proposal such as this provides the best opportunity to achieve the public benefit of increasing deep soil planting and tree canopy cover, and the higher development standard is in the public interest.***

National Storage Response: Since lodging the PP with Inner West Council on 7 September 2023, the Proponent has worked closely with the Inner West Council Strategic Planning staff to identify a suitable balance of deep soil landscaping on the site. This engagement has included multiple in person meetings and preparation of a number of design options to determine the right balance of landscaping.

National Storage acknowledge the NSW Greener Neighbourhood Guide which targets 15% deep soil landscaping in Industrial Area, however notes that this is a target that needs to be balanced with the current character of the area. Inner West Council is a highly urbanised area, and the Marrickville-Sydenham Industrial Area is reflective of this with buildings being to street alignment and minimal landscaping area. The site itself currently does not have any landscaping on site, which is consistent with other industrial sites in the Marrickville-Sydenham Industrial area.

The Proponent has worked hard to identify where additional new deep soil landscaping can be accommodated on the site based on technical engineering requirements and limitations, while also being responsive to the character of the area.

The selected location provides a location where landscaping can be most accessible to the streetscape and planting has good access to sunlight and ground conditions which will support the growth of dense vegetation with large canopy coverage which can spill out beyond the site boundaries.

By requiring 15% deep soil landscaping on the site, it would result in the following development and environmental impacts:

- Increased flood management impacts.
- Existing site infrastructure including sewer.
- BCA upgrades of existing warehouse building.
- Ongoing operation of the Site.

Given the existing character of Marrickville, the current landscaping conditions of the site, and environmental impacts on the site and surrounding area if 15% deep soil landscaping is required, the Proponent maintains their position that a 7.5% deep soil landscaping requirement is suitable for the site and surrounding character. Also noting that any additional targets exceeding 7.5% as imposed also will affect the viability of the development as well as the Proponent's operational needs and requirements.

3. CONCLUSION

We would welcome the opportunity to meet again with Council to discuss Council's position on the Local Planning Panel's recommendations to help advance this Planning Proposal to a Council meeting in early 2025.

Should you have any further queries, please don't hesitate to contact Zachary Quintal (zquintal@urbis.com.au) or myself on the details below.

Yours sincerely,

A handwritten signature in black ink, appearing to read "D. Blakeley".

Danielle Blakeley
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