



IRF25/925

Gateway determination report – PP-2023-1846

11-11A Edinburgh Road, Marrickville

May 25



Published by NSW Department of Planning, Housing and Infrastructure

dpie.nsw.gov.au

Title: Gateway determination report – PP-2023-1846

Subtitle: 11-11A Edinburgh Road, Marrickville

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Acknowledgment of Country

The Department of Planning, Housing and Infrastructure acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

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Table 1 Reports and plans supporting the proposal

Relevant reports and plans
Appendix A – Planning Proposal Report
Appendix B – Council Report and Resolution
Appendix C – Flood Assessment
Appendix D – IWLEP Key Site Maps
Appendix E – Economic Strategic Positioning Paper
Appendix F – Inner West Local Planning Panel Minutes
Appendix G – Acid Sulfate Soils Report
Appendix H – Geotechnical Report
Appendix I – Urban Design Report
Appendix J – Indicative Concept Architectural Plans
Appendix K – Transport Assessment

1 Planning proposal

1.1 Overview

Table 2 Planning proposal details

LGA	Inner West
PPA	Inner West Council
NAME	11 – 11A Edinburgh Road, Marrickville
NUMBER	PP-2023-1846
LEP TO BE AMENDED	Inner West Local Environment Plan 2022 (IWLEP 2022)
ADDRESS	11-11A Edinburgh Road, Marrickville
DESCRIPTION	Lot 69/DP4991 Lot 1/DP607677
RECEIVED	19/03/2025
FILE NO.	IRF25/925
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal

1.2 Objectives of planning proposal

The planning proposal (**Attachment A**) contains objectives and intended outcomes that adequately explain the intent of the proposal.

The objectives of this proposal seek to:

- Support the growth of the Inner West, Harbour CBD and Eastern Economic Corridor (EEC) through delivering additional floorspace for self-storage units.
- Improve and increase the supply of self-storage units within the Inner West Local Government Area.
- Preserve existing permitted land uses on site to support long term flexibility of employment land uses within Sydenham-Marrickville Industrial Area.

The objectives of this planning proposal are clear and adequate.

1.3 Explanation of provisions

The planning proposal (**Attachment A**) seeks to amend the IWLEP 2022 to:

- Identify Lot 1 DP607677 and Lot 67 DP4991 (11 – 11A Edinburgh Road, Marrickville) on the Key Sites Map.
- Enable an increased floorspace ratio (FSR) to be achieved by introducing a new site-specific clause for Lot 1 DP607677 and Lot 67 DP4991, as identified on the Key Sites Map under Part 6 of the IWLEP 2022 to enable future development:
 - To exceed the floor space ratio by an amount no greater than 2.25:1 if the building is used for self-storage units
 - To provide a minimum of 7.5% of the site area as deep soil landscaped area.
- Include a maximum building height of 30 metres (RL34.53) on the Height of Buildings Map.

The Department notes that Council resolved to make amendments to the above provisions in the planning proposal, which are not reflected in the document submitted to the Department.

The Local Planning Panel (LPP) recommended that a minimum of 7.5% of the total site must be retained for deep soil planting if the existing warehouse is largely retained. However, it also recommended that if any more than 25% of the existing warehouse is removed, then 15% of the total site should be provided as deep soil planting. This was supported by Council who resolved for it to be updated in the proposal, which has not occurred.

The variable deep soil landscaping requirements are not a typical control within an LEP provision and lacks clarity on what the requirements for the deep soil landscaped area should be. A Gateway condition has been included to clarify that the proposed local provision will require that only 7.5% of the site is used for deep soil landscaping.

A Gateway condition has been included requiring the planning proposal to be updated to remove the proposed 30 metre height of building control as per Council's recommendation.

A Gateway condition has also been included requiring all documentation to be updated to be consistent as currently there are minor discrepancies in the description of the proposal across the submitted documents.

1.4 Site description and surrounding area

The site is located at 11 – 11A Edinburgh Road Marrickville and is made up of two rectangular lots, located in an industrial area in Marrickville (**Figures 1 and 2**). Sitting on 7,127m² the site is currently occupied by two warehouse buildings, the primary land use is a self-storage facility as well as a vehicle repair workshop.

The site is zoned E4 – General Industrial and is generally flat. The site is identified within the Marrickville Flood Planning Area (Overland Flow) as noted in the Council report (**Appendix B**) and the submitted Flood Assessment (**Appendix C**). Parts of the site and surrounding area (primarily along Edinburgh Road) experience overland flooding during major rain events. The site is also likely to be impacted during a 1% Annual Exceedance Probability (AEP) event.

The site sits within an industrial area with other industrial and commercial uses surrounding the site including a vehicle repair workshop, manufacturing and other industrial uses. The adjoining site to the east contains a vehicle repair workshop. In the wider context of the site there is a large retail shopping centre to the west of the site (Marrickville Metro), a primary school and residential dwellings houses to the north and east of the site.



Figure 1: Subject site (source: Planning Proposal, 2023)



Figure 2: Site context (source: Planning Proposal, 2023)

1.5 Mapping

Mapping showing the proposed changes to the Inner West LEP 2022 are included in **Appendix D** and shown in **Figure 3**, which are suitable for community consultation.



Figure 3: Proposed Inner West Key Site Map (site is highlighted in blue) (Source: Planning Proposal, 2024)

1.6 Background

- The planning proposal was initially submitted to Council in 2023. Council raised concerns about the original proposal regarding urban design, lack of deep soil planting, tree coverage and management of urban heat.
- The proposal was resubmitted to Council in November 2024.
- The planning proposal was considered at the IWLPP on 17 December 2024, which provided additional feedback on the proposal and recommended additional items that needed to be addressed prior to submission to the Department.
- The planning proposal was approved at the Inner West Council meeting in March 2025 (**Appendix B**) and was subsequently submitted to the Department.

2 Need for the planning proposal

Q1. Is the planning proposal a result of an assured local strategic planning statement, or Department approved local housing strategy, employment strategy or strategic study or report?

The planning proposal is not the result of a strategic study or report. The planning proposal is the result of a request made to Council by the landowner.

Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The intended outcomes of the proposal cannot be implemented without an amendment to IWLEP 2022.

The planning proposal seeks to introduce a site specific provision into the IWLEP 2022, to enable additional floor space for self-storage units. The introduction of a site-specific provision clause is considered the best means of achieving the objectives and intended outcomes of the proposal because it ensures that the additional floor space is used for self-storage units only.

An alternative approach to the site-specific clause is to amend existing controls including the mapped Height of Building and Floor Space Ratio controls. However, this would provide no guarantee that the additional floor space would be used for self-storage units.

3 Strategic assessment

3.1 Regional Plan

The planning proposal is consistent with The Greater Sydney Region Plan - A Metropolis of Three Cities (March 2018) (Region Plan). Under section 3.8 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) a planning proposal is to give effect to the relevant District Plan. By giving effect to the District Plan, the proposal is also consistent with the Region Plan. Consistency with the District Plan is assessed in Section 3.2 below.

3.2 District Plan

The site is within the Eastern District Plan, the Greater Sydney Commission released the Eastern City District Plan on 18 March 2018. The plan contains planning priorities and actions to guide the growth of the district while improving its social, economic and environmental assets.

The planning proposal is consistent with the priorities for infrastructure and collaboration, liveability, productivity, and sustainability in the plan as outlined below in **Table 4**.

The Department is satisfied the planning proposal gives to the District Plan in accordance with section 3.8 of the EP&A Act.

Table 3: District Plan Assessment

District Plan Priorities	Justification
Planning Priority E7: Growing a stronger and more competitive Harbour CBD.	The proposal seeks to allow for an increase in self-storage units to support the economic activity within the Harbour CBD and EEC and increased demand for these uses in proximity to residential growth. The site is currently zoned E4 – General Industrial and is located within proximity to major logistical hubs around Port Botany and the Sydney CBD. The proposal aligns with the planning priority.
Planning Priority E12: Retaining and managing industrial and urban services land.	<p>The proposed amendment seeks to deliver additional floor space for self-storage units within the Marrickville industrial area. Within the Greater Sydney Region Plan, managing and retaining industrial land close to centres and transport will ensure services are available to support business and residents. As the site is located within the EEC it provides a range of services for people and businesses. The proposal will ensure the site retains its industrial land zoning while also allowing an increase in floorspace for self-storage units.</p> <p>It is noted that self-storage units are not the highest employment generating land use. However, the site is already used for self-storage and the redevelopment and</p>

District Plan Priorities	Justification
	extension of the site capacity would benefit other business uses and provide additional self-storage space in the EEC. The Department notes that the use is permitted under the current zoning. The proposed local provision seeks to allow for additional floor space for the current permitted use, as the site is a highly utilised business in its location. Additional storage, as noted in Appendix E (Economic Strategic Positioning Paper), would benefit the other industrial and commercial uses surrounding the subject site.

3.3 Local Plans

The proposal states that it is consistent with the following local plans and endorsed strategies as stated in **Table 5**.

Table 4: Local Strategy Assessment

Local Strategies	Justification
Local Strategic Planning Statement	<p>The Our Place Inner West: Local Strategic Planning Statement (LSPS), adopted in March 2020; sets out the strategic planning vision for the Inner West in 2036. The LSPS contains a set of six priorities, objectives and actions that guide the vision.</p> <ul style="list-style-type: none"> Planning Priority 1: Adapt to climate change: <p>The proposed amendment seeks to include a deep soil area to help mitigate the impact of urban heat in the precinct. The proposal also identifies how the potential development concept can address flood mitigation within the proposed design. The proposal is consistent with Priority 1.</p> Planning Priority 9: A Thriving local economy: <p>The proposal will retain the E4 – General Industrial zoning. The proposal is facilitating increased FSR through a site-specific clause to allow for the redevelopment of the warehouse to provide additional self-storage units. There is a current demand for self-storage units as highlighted through the Economic Strategic Positioning Paper (Appendix E). The paper notes that the proposed self-storage use does not provide a high employment generating land use. However, the clause seeks to retain the existing zoning and provide parameters for self-storage units to ensure existing industrial and urban services can still be provided. The proposal is consistent with Priority 9.</p> <p>The proposal is consistent with the LSPS.</p>
Our Inner West 2036 (Community Strategic Plan) (CSP)	<p>Our Inner West 2036 is a Community Strategic Plan (CSP) which was adopted by Council in June 2022. The strategy provides a framework and vision, crafted through working with the community to better understand how and where they want to see change in the Inner West over a ten-year period, and direction with metrics on how to measure the progress towards the community's vision.</p> <p>Strategic Direction 3: Creative Community and a strong economy:</p> <p>The proposal aligns with Direction 3 as the amendment seeks to provide additional floor space for self-storage units within an industrial precinct. The proposed controls will allow for high quality industrial development within the existing industrial area. The proposed deep</p>

Local Strategies	Justification
	soil landscaping will provide better public domain and mitigation from urban heat. The additional storage will provide local businesses and residents the opportunity to store more items in a well-located self-storage units. The proposal is consistent with Strategic Direction 3.

3.4 Local planning panel (LPP) recommendation

The planning proposal was referred to the Inner West Local Planning Panel (IWLPP) as per the EP&A Act, on 17 December 2024. The LPP resolved (**Appendix F**) that the proposal is to be conditionally supported and recommends further refinement of the matters discussed in **Table 6**.

Table 5: Inner West Local Planning Panel Recommendation

IWLPP Recommendation	Council Report Response
Ensure that additional floor space is only available and or permitted for self-storage purposes and cannot be used for other purposes through the SEPP (Exempt & Complying Development Codes).	It is unlikely that the additional FSR will be used for uses other than self-storage via the Exempt and Complying Development Codes Pathway. SEPP (Exempt & Complying Development Codes) Part 1, Division 2 Exempt and Complying Development would not apply to the site as the site is affected by Acid Sulfate Soils Class 2.
Exclude the site from the application of Clause 4.6	As per Local Planning Direction 1.4A, the objective of this direction is to maintain flexibility. At the development application stage, it is highly unlikely that a clause 4.6 variation would be allowed as the site has been given adequate additional uplift through the planning proposal pathway.
Imposition of a building height standard is considered unnecessary	The Panel's concerns are understood regarding the potential mismatch of FSR and height control. It is recommended that the proposed height control therefore be removed from the proposal. This is consistent with the existing approach for industrial lands in the IWLEP where there are no height controls, and the built form is largely governed by the FSR control.
That the deep soil area should be increased to 15% in line with the NSW Greener Neighbourhood Guide	The planning proposal is recommended to be amended to provide 7.5% - 15% deep soil depending on the alterations proposed to the existing warehouse.

The Department notes that Inner West Council's response to the recommendations from the LPP are adequate.

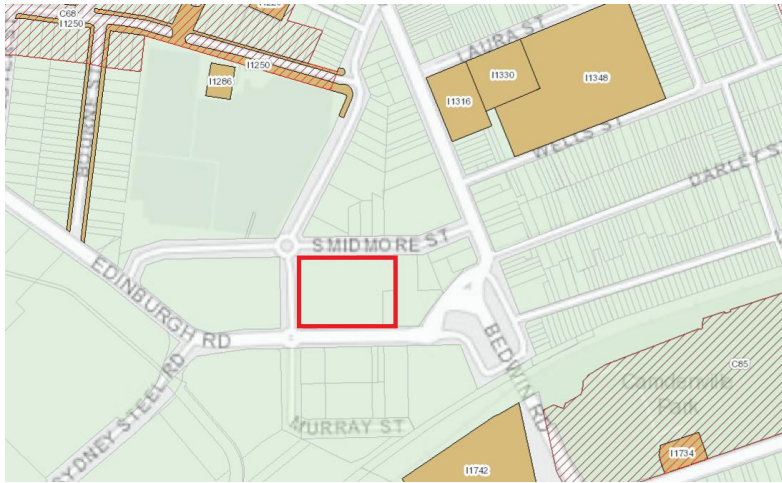
The Department notes and agrees that the introduction of a height of building control is not appropriate for this form of development. The existing Marrickville industrial area surrounding the site, as well as the subject site have no current height of building controls in place. The existing built form controls for the Marrickville industrial precinct are managed by FSR controls alone. The proposed FSR control will ensure development is within the Obstacle Limitation Surface limit of 51 metres. As noted in Section 1.3 Explanation of Provisions a gateway condition is proposed requiring the proposal to be updated to remove the proposed height of building provision aligned to Council's resolution.

The planning proposal notes the importance of providing deep soil landscaping given the industrial area is impacted by urban heat due to the lack of tree canopy. Having a varying deep soil requirement lacks clarity and is not considered appropriate in an LEP provision. This type of provision would typically be included in a site specific Development Control Plan (DCP). A gateway condition is proposed requiring the planning proposal to be updated to remove the variable deep soil landscaping requirement of 7.5%-15%. It is to be reworded to include a 7.5% deep soil landscaping requirement in the proposed provision. The reference design identifies this could be accommodated along the Murray Street frontage and any additional deep soil landscaping could be considered at the development assessment stage.

3.5 Section 9.1 Ministerial Directions

The planning proposal's consistency with relevant section 9.1 Directions is discussed in **Table 7**.

Table 6: Ministerial Direction Assessment

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
3.2 Heritage Conservation	Consistent	<p>The site has no identified or known Aboriginal and or European heritage significance. There are several heritage items in the surrounding areas of the site as shown in Figure 4.</p> <p>The proposal is unlikely to impact any of the identified heritage items in the vicinity of the site given their distance from the site. The existing provisions in the Inner West LEP 2022 under Section 5.10 Heritage Conservation, provide further consideration and protection of heritage at the development application stage.</p> <p>The proposal is consistent with the Direction.</p>  <p>Figure 4: Heritage Items in the vicinity of site (Source: Spatial Viewer)</p>

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
4.1 Flooding	Inconsistent	<p>The site is located on flood prone land identified in the Marrickville DCP 2011 and Marrickville Valley Flood Study. The Marrickville Valley Flood Study identifies that:</p> <ul style="list-style-type: none"> • All streets surrounding the proposed development are overland flow paths with Murray Street and Edinburgh Road subjected to varying significant depths of flooding. • The 1% AEP flood levels at street entries to the site range from 5.25 metres AHD to 5.78 metres AHD. • The 1% AEP flood depth ranges from 0-1 metres in the surrounding streets. • The site experiences flooding between 0.2 metres – 0.4 metres in certain parts and 0.4 metres – 0.6 metres within the driveway of the site. • The 1% AEP maximum flood depth on the site is 0.4 - 0.6 metres, on a southern section of the site containing no existing structures. <p>The planning proposal is inconsistent with the direction as it permits an increase to development potential in the flood planning area.</p> <p>A Flood Assessment Report (Appendix C) accompanies the planning proposal to ensure the proposal has considered potential flood impacts both on and off the subject land. The flood assessment report identifies that:</p> <ul style="list-style-type: none"> • The proposed additional development permitted by the provision adheres to Council's Flood Risk Management Plan which identifies a Flood Planning Level (FPL) of 5.83m which is sufficiently above the 1% AEP. • The existing overland flow flooding generally occurs within the street catchments with most of the flooding on site being experienced in the entryway. • There is a slight increase in the 1% AEP flood levels on Murray Street as a result of the proposal, with the majority of the surrounding streets not being adversely affected by flooding (H1 and H2 hazard levels). <p>Existing conditions (Error! Reference source not found.) show flood depths around the site with the red areas being the highest at 0.8-1</p>

metres at the corner of Edinburgh and Murray Street, and along Edinburgh Street.

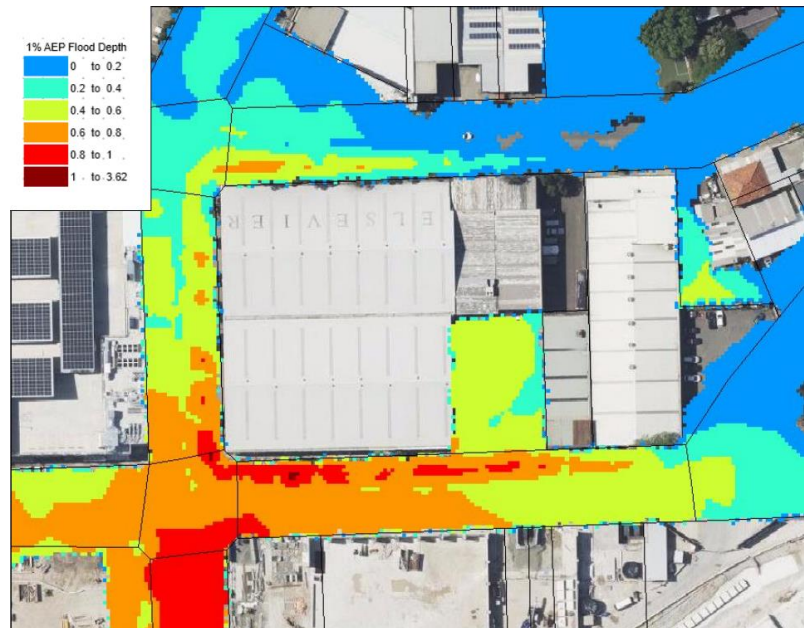


Figure 5 Existing conditions – 1% AEP Flood Depth (Source: Flood Assessment, 2024)

Developed conditions (**Figure 6**) show minor changes in the blue areas circled. There is an increase in 1% AEP flood levels on Murray Street, with majority of the area affected by less than 2 cm. This can be deemed as an insignificant impact.

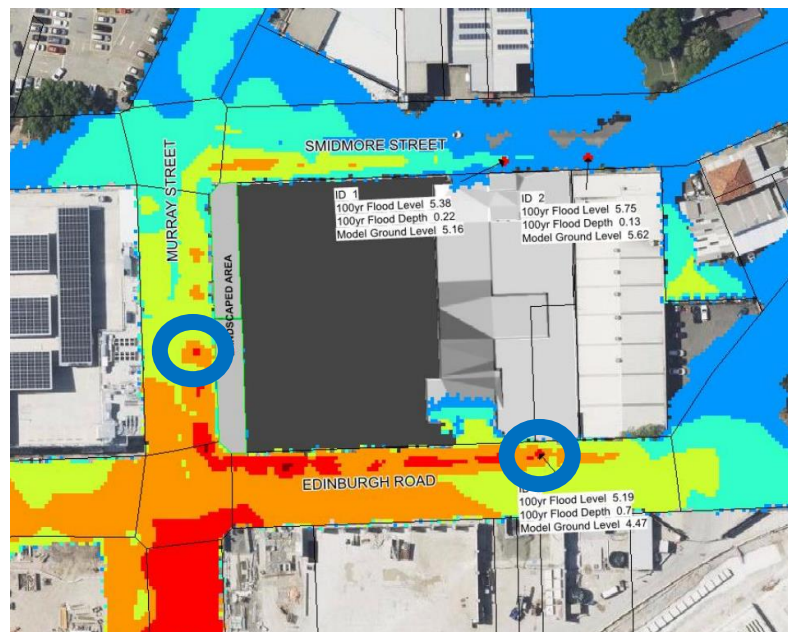


Figure 6: Developed conditions – 1% AEP Flood Depth (Source: Flood Assessment, 2024)

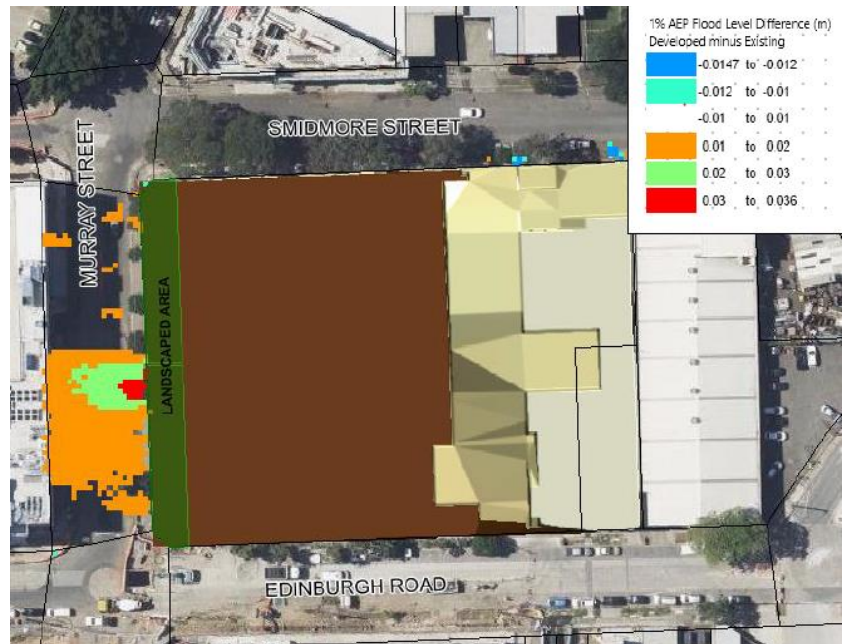


Figure 7: Impact of proposed development – 1% AEP Event
(Source: Flood Assessment, 2024)

Figure 7 shows the minor impact of the proposed development along Murray Street. The maximum difference in the 1% AEP flood level in metres increases from 0.03 to 0.036 metres (shown in red).

The proposed deep soil landscape area will help retain some of the water, helping to mitigate some of the flooding along Murray Street.

- Part of the site along Edinburgh Road will have a small section of H3 flood hazard level where the driveway is currently located (circled blue, **Figure 6**).
- As shown in **Figure 6** the preliminary flood study has modelled the developed condition of the overland flooding for the site. The modelled conditions illustrates that the development wouldn't increase the intensity of the flooding on site and in the surrounds. Given the hazard level illustrated in Figure 5 of the Flood Assessment (**Appendix C**), the continued land use being self-storage units is unlikely to create additional adverse risk on site and in the surrounding streetscapes. However, this will be further determined at the development application stage.
- The existing warehouse is located below the Inner West Council DCP FPL and is exposed to flood risk from the Edinburgh Road flooding. Under the proposed development, the floodwaters can still enter this building from the proposed driveway from Edinburgh Road. A flood gate is proposed at the entrance of the existing building to manage the flood risk.
- The proposal also notes the inclusion of additional flood storage to mitigate the sites flooding with further design details undertaken at development assessment stage.

A preliminary flood study has been prepared in accordance with the Marrickville Valley Floodplain Risk Management Plan and the NSW

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
		Floodplain Development Manual 2005. It is considered the proposal has adequately addressed the inconsistency with the Directions and the future development is likely to be capable of being commensurate with flood behaviour. The proposal notes that there will be further work conducted at the development application (DA) stage of the proposal to consider further floodproofing measures.
4.4 Remediation of Contaminated Land	Consistent	The planning proposal does not seek to change the E4 – General Industrial zoning. Based on a review of past land uses, there is no evidence to suggest that the site may potentially be contaminated. As the Acid Sulfate Soils Report (Appendix G) and the Geotechnical Report (Appendix H) note further investigations will be conducted during the DA stage of the proposal to confirm whether the land is likely to be contaminated. With no proposed change to zoning, and no evidence of contamination the proposal is considered to be consistent with the Direction.
4.5 Acid Sulfate Soil	Inconsistent	<p>The site is identified as having Class 2 Acid Sulfate Soils in the IWLEP 2022. The planning proposal seeks to intensify the use of the site and is therefore possibly inconsistent with the direction as soil disturbance impacts could occur.</p> <p>An acid sulfate soils study was prepared (Appendix G) and found that as the proposal does not seek to include a basement, will require minimal excavation to achieve design levels and excavation only for piercing - the work is considered a minor disturbance. The study concluded that there is no need for an acid sulfate soils management plan prior to development consent.</p> <p>The inconsistency with the Direction is considered acceptable given the acid sulfate soils study submitted with the proposal has identified future development and the proposed intensification of the land for self-storage units will likely be able to avoid significant adverse environmental impacts.</p>
5.1 Integrating Land use and Transport	Consistent	<p>The proposal is seeking to increase FSR for self-storage units in a highly accessible location close to multiple forms of public transport including heavy rail at Sydenham and St. Peters train stations. The site supports the 30-minute city and provides more local jobs in an accessible location.</p> <p>The proposal is consistent with the Direction.</p>
5.3 Development near Regulated Airports and Defence Airfield	Consistent	<p>The site is located within 2km of Sydney Airport, both the current and proposed land uses are compatible with the airport operations. Council noted early consultation with Civil Aviation Safety Authority who raised no objections to the proposal as the roof line of the building is under the Sydney Airport Obstacle Limitation Surface Level (OLS) of 51.8m.</p> <p>A Gateway condition has been included requiring consultation with Sydney Airport Corporation and the Civil Aviation Safety Authority</p>

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
		<p>given amendments to the proposal through gateway conditions which include removing the proposed maximum height of building from the provision.</p> <p>The proposal will not adversely affect the safe operation of the airport. The proposal is consistent with the Direction.</p>
7.1 Business and Industrial Zones	Consistent	<p>The submitted proposal does not seek to change the E4 – General Industrial zone provisions. The proposed amendment seeks to allow for site specific provisions that allow for an increase to the floor space ratio, which will facilitate the re-development of the site for self-storage units.</p> <p>The proposal will retain a zoning which permits self-storage units. Noting that self-storage units are not the highest employment generating land use compared to other employment uses within the precinct, the proposed local provision will provide parameters to limit the additional capacity permitted for self-storage units. The local provision will ensure the existing land zoning is retained to enable other employment generating uses to be provided on the site in the future. The subject site as highlighted through the Economic Strategic Positioning Paper (Appendix E), notes the site has a high utilisation rate demonstrating the need for additional self-storage units capacity.</p> <p>The proposal is consistent with the Direction.</p>

3.6 State environmental planning policies (SEPPs)

The below table discusses relevant SEPPs in **Table 8**.

Table 8 Assessment of planning proposal against relevant SEPPs

SEPPs	Requirement	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
SEPP Resilience and Hazard 2021	The Resilience and Hazards SEPP 2021 provides the planning framework for the management of contaminated parcels of lands throughout NSW.	Consistent	<p>The site is zoned E4 General Industrial and is within an established industrial precinct. Clause 4.6 of the Resilience and Hazards SEPP state that the consent authority must not consent to development unless it is satisfied that the land will be remediated before the land is used for that purpose.</p> <p>There are no changes to the zoning of the site. Further consideration of contamination will be undertaken at the DA stage.</p>

SEPPs	Requirement	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
SEPP Sustainable Building 2022	The Sustainable Building SEPP 2022 sets out sustainability standards for residential and non-residential developments and starts the process of measuring and reporting on the embodied emissions of materials used in development.	Consistent	<p>The Sustainable Building SEPP provides sustainability outcomes proposed development and delivery of sustainable buildings.</p> <p>The proposed provision is to include a requirement for 7.5% of the site area to be a deep soil landscaped area. The planning proposal notes further sustainable design elements methods will be considered at the DA stage. The proposal aligns with the considerations required for the Sustainable Building SEPP.</p>

4 Site-specific assessment

4.1 Environmental

Table 9 provides an assessment of the potential environmental impacts associated with the proposal.

Table 9 Environmental impact assessment

Environmental Impact	Assessment
Flooding	The site is identified in the Marrickville DCP 2011 as within a flood planning area. Flooding impacts are addressed in Table 7 .
Built form and scale	<p>An urban design report (Appendix I) and concept architectural plans (Appendix J) support the planning proposal.</p> <p>The urban design report notes the controls will allow for a proposed built form that will be of a similar bulk and scale to the surrounding development including to the west of the site and the Marrickville Metro shopping centre. Once developed the future scale and bulk of the site will align with proposed future development for the industrial precinct.</p>
Landscaping	The proposed provision will require 7.5% of the site to be reserved for deep soil planting. This provision is proposed to ensure established trees and other species of plants are incorporated into the site to help mitigate the urban heat island affect experienced in the Marrickville industrial precinct.
Solar access and Overshadowing	The urban design report (Appendix I) includes a solar access analysis to determine the overshadowing impact of the proposed built form. Given the location of the site in an industrial area it is not considered that overshadowing resulting from the proposal will have a significant adverse impact.

4.2 Social and economic

The following table provides an assessment of the potential social and economic impacts associated with the proposal.

Table 10 Social and economic impact assessment

Social and Economic Impact	Assessment																									
Self-storage space demand	<p>An economic strategic positioning paper (Appendix E) prepared by Urbis was submitted with the planning proposal to demonstrate the need for a self-storage facility in the locality. Appendix E demonstrates the demand that the site is has. With around a 95% occupancy, above the benchmark of 83% across Sydney.</p> <p>It also noted that the increase in FSR would allow for more residents and businesses within the vicinity of the site to be able to locally access storage solutions where there is a significant gap in available self-storage spaces in the surrounds as shown below.</p> <table><tr><th colspan="5">Self storage Demand Gap (sq.m)</th></tr><tr><th></th><th>2022</th><th>2027</th><th>2032</th><th>2037</th></tr><tr><td>Demand</td><td>150,000</td><td>170,000</td><td>195,000</td><td>225,000</td></tr><tr><td>Supply</td><td>117,438</td><td>133,809</td><td>133,809</td><td>133,809</td></tr><tr><td>Demand Gap</td><td>32,563</td><td>36,192</td><td>61,192</td><td>91,192</td></tr></table> <p>Figure 7: Self storage demand (Source: Economic Strategic Positioning Paper, 2023)</p>	Self storage Demand Gap (sq.m)						2022	2027	2032	2037	Demand	150,000	170,000	195,000	225,000	Supply	117,438	133,809	133,809	133,809	Demand Gap	32,563	36,192	61,192	91,192
Self storage Demand Gap (sq.m)																										
	2022	2027	2032	2037																						
Demand	150,000	170,000	195,000	225,000																						
Supply	117,438	133,809	133,809	133,809																						
Demand Gap	32,563	36,192	61,192	91,192																						

4.3 Infrastructure

Table 11 provides an assessment of the adequacy of infrastructure to service the site and the development resulting from the planning proposal and what infrastructure is proposed in support of the proposal.

Table 11 Infrastructure assessment

Infrastructure	Assessment
Traffic and Transport	<p>The site is serviced by a range of public transport services including:</p> <ul style="list-style-type: none"> • 3 bus stops within 400 meters walking distance. • Two train stations; St. Peter's and Sydenham Stations within a 10-minute walking distance. • Off and on road cycling paths. <p>The Transport Assessment (Appendix K), notes the Marrickville DCP 2011 does not list parking rates for self-storage units. As a result, the car parking provision was developed based off the Aurecon Self Storage Facility Traffic and Parking Study, 2009, which considered parking spaces calculated from the gross floor area of the site. As the site is over 9,000sqm, the document does not explicitly list a number of parking spaces.</p> <p>The Transport Assessment notes 16 car parking spots for the site would be sufficient to allow for workers and clients of the self-storage facility to be able to park on site. The report noted that the development would have a negligible impact on the surrounding road network.</p>
Utilities and services	<p>The planning proposal confirms the site is adequately serviced by public utilities and infrastructure, including electricity, telecommunications, water, sewerage and stormwater.</p>

5 Consultation

5.1 Community

Council proposes a community consultation period of 28 days.

The planning proposal is categorised as standard under the LEP Making Guidelines (August 2023). Accordingly, a community consultation period of 20 working days is recommended and this forms part of the conditions to the Gateway determination.

5.2 Agencies

It is recommended the following agencies be consulted on the planning proposal and given 30 working days to comment:

- Utilities providers (i.e Sydney Water, Ausgrid etc)
- Sydney Airport Corporation
- Civil Aviation Safety Authority
- Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts

6 Timeframe

The LEP Plan Making Guidelines (August 2023) establishes maximum benchmark timeframes for planning proposal by category. This planning proposal is categorised as standard.

The Department recommends an LEP completion date of 12 March 2026 in line with its commitment to reducing processing times. A condition to the above effect is recommended in the Gateway determination.

7 Local plan-making authority

Council has advised that it would like to exercise its functions as a local plan-making authority. Under Section 3.36 of the EP&A Act 1979 as Local Plan-Making Authority (LPMA).

8 Assessment summary

The planning proposal is supported to proceed with conditions for the following reasons:

- The planning proposal has adequately demonstrated the need for additional self-storage units within the context of Greater Sydney, through additional studies undertaken.
- The planning proposal gives effect to the District Plan and Local Strategic Planning Statement by enabling site specific controls.
- Inconsistency with Section 9.1 Directions: 4.1 Flooding and 4.5 Acid Sulfate Soils are minor and justified, with the support of the submitted reports.
- The proposal is consistent with other relevant Section 9.1 Directions.
- An amendment to the IWLEP 2022, is the best means of achieving the objectives and intended outcomes of the planning proposal.
- Further consultation will be required with listed agencies above in Section 5.2.
- Likely environmental, social and economic impacts have been identified and assessed accordingly.

9 Recommendation

It is recommended the delegate of the Secretary:

- Agree that any inconsistencies with the following section 9.1 Directions are minor and justified, as a result of supporting reports:
 - 4.1 Flooding
 - 4.5 Acid Sulfate Soils

It is recommended the delegate of the Minister determine that the planning proposal should proceed subject to conditions.

The following conditions are recommended to be included on the Gateway determination:

1. The planning proposal is to be updated prior to consultation to:
 - ensure all planning proposal documents and supporting documentation are consistent.
 - remove the proposed height of building control provision
 - ensure the proposed provision includes a requirement for 7.5% of the site to be provided as deep soil planting and remove the proposed 15% requirement
2. Consultation is required with the following public authorities
 - Utility providers (Sydney Water, Ausgrid etc)
 - Sydney Airport Corporation
 - Civil Aviation Safety Authority

- Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts.
3. The planning proposal should be made available for community consultation for a minimum of 20 working days

Given the nature of the planning proposal, it is recommended that the Gateway authorise council to be the local plan-making authority and that an LEP completion date 12 March 2026 be included on the Gateway.

20 May 2025

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2 June 2025

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